

# Stakeholder's Report

## RECORDS OF DECISION ON HOLD

### LUR ISSUE NEAR RESOLUTION

The sometimes contentious issue of Land Use Restrictions (LURS) is nearing resolution.

The issue first became contentious after states, like Florida and California, believed that they did not have any legal leverage over military (federal) installations that decided to change land use at a previously cleaned up site. This issue is this: while Base Realignment and Closure (BRAC) installations had deed restrictions as property was turned over to local communities, non-BRAC bases had no deed restrictions to control future land use and to protect human health and the environment.

The issue also includes varying levels of cleanup. In some cases, depending on land use, a less expensive cleanup alternative to meet industrial vice residential standards could be used. This would save the government, and taxpayers, millions of dollars, and still meet cleanup standards as specified by EPA and the states.

As a result, states like Florida and California decided they couldn't sign Records of Decision (RODs) with the confidence that there would be legal leverage over future land use. Consequently, ROD signings in these states remain on hold, some for longer

than a year.

"The State (Florida Department of Environmental Protection - FDEP) could not in good conscience approve a Record of Decision (ROD) for specific cleanup action without viable land use restrictions," said Jorge Caspary of FDEP. "We needed language that could be applied in the ROD which gave the Department (FDEP) the legal leverage to ensure military bases in Florida established and maintained LURS and had procedures that included the state in any plans to change LURS for specific sites."

While slow, progress has been made.

In California, military, state, and EPA officials have prepared a guidance document that will serve the same purpose as deed restrictions for closed bases.

In Florida, representatives from Commander, Naval Base, Jacksonville (COMNAVBASE JAX), Southern Division (SouthDiv), U.S. Environmental Protection Agency (EPA) Region IV, FDEP, and cleanup contractors, agreed to test a land use restriction initiative at three Florida naval installations - Naval Air Station Jacksonville, Naval Air Station Key West, and

(Continued on back page)



#### ➤ ENVIRONMENTAL CLEANUP

**EXHIBIT** — NAS Jacksonville will host an Environmental Cleanup Exhibit at the Holiday Inn Orange Park (US 17 and I-295) on Tuesday, August 19, from 7 to 9 p.m. The exhibit will explain the cleanup actions at Operable Unit (OU) 2 and at Buildings 106 and 780. A special information section on "natural attenuation" — the breakup or reduction of contamination caused by natural microscopic organisms in the soil (how microorganisms eat contamination) — will illustrate how this process is applied and what it means to cleanup actions at the air station. In addition to static displays, fact sheets and environmental personnel will be available to answer questions.

➤ **NEW SITES IDENTIFIED** — Two new Potential Source of Contamination (PSC) sites have been identified at NAS Jacksonville. PSC 50 is the site of the former east side wastewater treatment plant sludge disposal area. PSC 51 is the south antenna field fire fighting training area. The sites were identified through historical information, interviews, and testing. Both sites will undergo screening to determine the type(s) of possible contamination present. If necessary, these site will undergo a Remedial Investigation and Feasibility Study (RI/FS) to fully evaluate the areas for future cleanup.

➤ **OPERABLE UNIT (OU) ONE** — Final design for the cleanup of OU1 is complete. The design, reviewed by the U.S. Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP), is a cap-cover system that will cover the 40-acre area. The cleanup includes groundwater monitoring and the use of natural attenuation. OU1 includes PSC 26 (Old Landfill) and PSC 27 (Old Transformer Storage Area). Clearing of brush is scheduled to start in September. Cleanup work will begin when funding is received.



(top) NAS JAX Restoration Advisory Board (RAB) members tour the Site Characterization and Analysis Petronometer System (SCAPS) truck during their July meeting. (right) George Jeffen, Public Works Center SCAPS engineer, explains to Martha Berry, EPA Region IV, and Mark Reasoner, RAB community member, how SCAPS identifies/locates petroleum contamination in the soil. (Photos by Bill Dougherty)

### SCAPS IMPRESSES NAS JAX RAB



# OPERABLE UNIT (OU) TWO REMEDIAL INVESTIGATION UNDERWAY

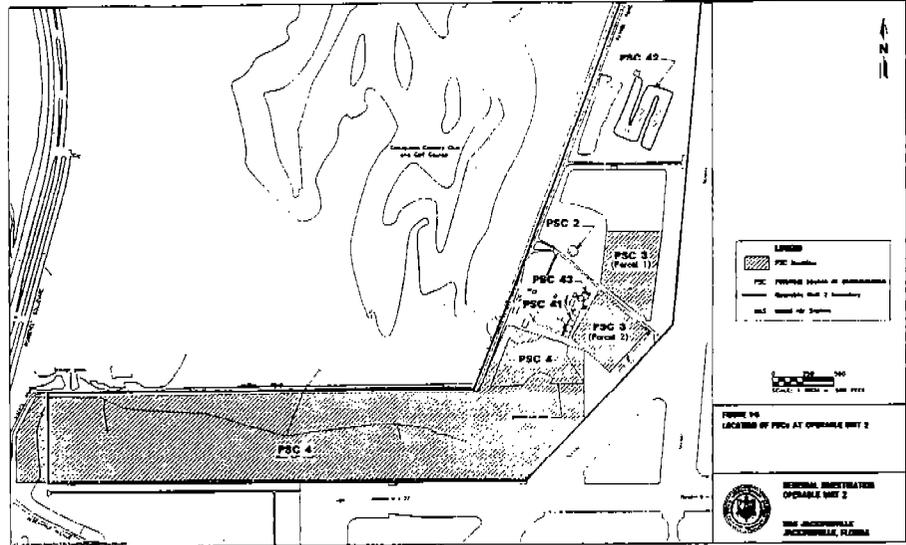
Interim cleanups at sites within Operable Unit (OU) 2 have the overall cleanup near completion. Aggressive efforts by the NAS Jacksonville partnering team (includes the Navy, U.S. Environmental Protection Agency (EPA), Florida Department of Environmental Protection (FDEP), and environmental cleanup contractors) to target interim cleanups has put the air station in position to submit the final Remedial Investigation Report by October 1997.

There are six PSC's in OU2. They include:

- PSC 2 Former fire fighting training area
- PSC 3 Wastewater treatment plant ex-sludge disposal area
- PSC 4 Pine tree planting area
- PSC 41 Domestic waste sludge drying beds
- PSC 42 Polishing pond
- PSC 43 Industrial waste sludge drying beds

PSC 2 was transferred into the air station's petroleum program, which means it will be cleaned through other means. PSC's 3 and 4 were investigated and a small area of contamination was consolidated with the PSC 42 polishing pond cleanup and treated. Results of the testing will be included in the OU2 Remedial Investigation Report due out in October 1997.

PSC's 41's and 43's contaminated soils were also consolidated into PSC 42. The



cleanup at PSC 42 was completed in March.

The polishing pond underwent "in its place" stabilization, which involved mixing a cement mixture with the sediment and groundwater in the pond to form a large, solid block about two to four feet below the surface of the soil cover. The area, which was backfilled and hydroseeded, is now a large green field on the northeast corner of the air station.

PSC's 41, 42, and 43 will be closed per the Resource Conservation and Recovery Act — RCRA. The final Closure Reports for PSC's 41 and 43 — establishing the sites as clean — are under review by EPA and FDEP, and will be released in August 1997, while the final Closure Report on PSC 42

will be submitted to EPA and FDEP in December 1997. As part of the closure process, PSC's 41, 42, and 43 will undergo groundwater monitoring which is expected to start in Fiscal Year 1998.

With so much work already completed by cleanup contractors, the partnering team determined that a Feasibility Study would not be required. After completion of the Remedial Investigation, the air station expects to develop a proposed plan and move quickly to Record of Decision (ROD). While the remedial investigation will be complete in October, no firm time line has been set to issue the proposed plan and ROD. Watch for updates in future editions of the *Stakeholder's Report*.

**BE A PART OF THE PROCESS**

## NAS Jacksonville Environmental Cleanup Exhibit

NAS Jacksonville is hosting an exhibit to convey progress regarding its environmental cleanup program.

The public is invited to attend.

**7:00 P.M. TUESDAY, AUGUST 19, 1997 AT THE  
HOLIDAY INN, ORANGE PARK  
150 PARK AVENUE (I-295 AT US 17)**

For details about the exhibit or environmental cleanup activities at NAS Jacksonville, please call Bill Dougherty, Installation Restoration Public Affairs Officer, at (904) 542-4032.



### ACRONYM ALLEY

- CERCLA - Comprehensive Environmental Response, Compensation and Liability Act
- EPA - Environmental Protection Agency
- FDEP - Florida Department of Environmental Protection
- LUR - Land Use Restrictions
- NAS - Naval Air Station
- OU - Operable Unit
- PSC - Potential Source of Contamination
- RAB - Restoration Advisory Board
- RCRA - Resource Conservation and Recovery Act
- RI/FS - Remedial Investigation/Feasibility Study
- SCAPS - Site Characterization and Analysis Petronometer System

# C.A.P. CORNER

(CONCERN, ACTION, PROGRESS)

**Question:** *We've heard of CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) and RCRA (Resource Conservation and Recovery Act), but what's the difference between the two programs and how do these laws affect NAS Jacksonville?*

CERCLA — also known as “Superfund” — was enacted by Congress in 1980 to ensure that old hazardous waste disposal sites were identified, studied and cleaned. Fifty-one sites are currently identified as Potential Sources of Contamination (PSCs) at NAS Jacksonville. RCRA was enacted by Congress in 1976 and amended in 1984, and is designed with “cradle to grave” controls over the generation and transportation of hazardous wastes, including the operation, treatment, storage and disposal facilities. Basically, CERCLA cleans up old sites, whereas RCRA cleans up current operations. Where these two laws cross paths is when a cleanup is required at a RCRA permitted site. An example was the former In-

dustrial Wastewater Treatment Plant sludge drying beds and polishing pond at Potential Source of Contamination (PSC) 42. The polishing pond and sludge drying beds were permitted by RCRA. The sludges from the plant contained metals from electroplating operations and the polishing pond was designed to settle out the metal contamination not handled through the sludge. Water from the plant moved through the polishing pond and contaminants in the water settled into the pond's sediment. The waste from the treatment plant was identified as hazardous waste. This site was cleaned per CERCLA and RCRA regulations, meeting both federal and state requirements for hazardous waste cleanup. It takes a concerted effort by members of the NAS Jacksonville partnering team, which includes the Navy, U.S. Environmental Protection Agency, Florida Department of Environmental Protection, and cleanup contractors, to understand these laws and ensure NAS Jacksonville cleans its sites while meeting the requirements of these laws.

## NAS JAN RAB TAKES TOUR OF CLEANUP SITES

The NAS Jacksonville Restoration Advisory Board took a site tour on May 20. (left) Jerry Young, City of Jacksonville, inspects a PVC pipe to be used for air sparging -- blowing air into groundwater and vacuuming bubbles containing contamination -- at Bldg. 106, while John Stone and Trent Rogers, engineers for Bechtel Environmental, Inc. hold on. (below) RAB members also toured the mobile low temperature thermal desorption system. The system heats petroleum-contaminated soil, like a clothes dryer, evaporating petroleum products and cleaning the dirt for future use. Other sites visited by the RAB included Building 780 and 880 where soil vapor extraction -- vacuuming vapors from the soil -- will be used, and PSC 30, which involved the paving over of a grass storage yard and the building of a detention pond and training structures.



*Photos by  
Bill Dougherty*

# RAB RAP

UPDATE

FROM THE  
NAS

JACKSONVILLE

RESTORATION

ADVISORY BOARD



➤ **MEETING NOTES** — During recent Restoration Advisory Board (RAB) meetings, Diane Lancaster provided briefings on the station's 11 petroleum-contaminated sites and the status of work the work plan for a study of possible contamination at Casa Linda Lake.

The petroleum sites discussed included the 103rd Street pipeline leak (from 1989), tank 201B, a tank in the Auto Hobby Shop, Building 127E, a former tank site at Building 3900 in Westside Regional Park, the Navy Exchange Gas Station, Flying Club, Gas Hill, Hangar 115, the old Gas Station, and site 119.

Casa Linda Lake is under study to determine the extent of possible contamination in the water and sediments as a result of historical information and previous testing. The previous testing showed signs of pesticides and PCB's. The cleanup contractor will sample the soil, water, and fish. Updated information will be provided to the RAB during regular meetings.

➤ **NEW MEMBERS** — NAS Jacksonville's RAB is looking for new members. Members serve vital roles as direct liaisons from their communities to NAS Jacksonville and have the opportunity to input and affect decisions regarding cleanup activities on the installation. Commitment to the RAB requires attending monthly RAB meetings, an interest in the cleanup activities on base, and a desire to be the communications link between your local community and the Navy. Call 542-4032 for more details.

➤ **UPCOMING MEETINGS** — Mark your calendars for upcoming RAB meetings, all open to the public: September 16, October 21 and November 18, 1997. Meetings are held at the Timucuan Elementary School, 5429 110th Street, Jacksonville. Contact Bill Dougherty, Installation Restoration Public Affairs Officer, 542-4032, for further information.

## LAND USE RESTRICTIONS (CONT.)

Naval Station Mayport.

The Florida approach uses a Navy instruction - a directive - which requires installations to coordinate and execute a Memorandum of Agreement (MOA) with EPA and FDEP. SouthDiv and the installation would jointly draft an MOA for coordination and negotiation with EPA and FDEP. Once the general terms and conditions of the MOA are agreed to, the site specifics (e.g., land uses and site boundaries) can be added as appendices to the MOA.

The local MOA's would be supported and reinforced through RODs and closure permit restrictions (permit required to close a cleanup site under the Resource Conservation and Recovery Act).

Any changes to LURS would have to be approved by the base commanding officer with agreement from EPA, and FDEP. Another control tool for LUR's would be base master plans, which outline future operational and construction plans for the installation.

"There is a requirement for any construction project to be cleared environmentally," said Diane Lancaster, NAS Jacksonville's IRPM. "In the past, we (environmental program managers) were left out of the process. Now, more attention is given to the environmental aspects, especially when construction takes place on or near a cleanup site."

A benefit to EPA and FDEP is that installations are required to forward an annual certification of retention of the specific LUR category for each affected cleanup site. If there is a requested change to an LUR for a cleanup site, it is the responsibility of the base or the construction project contractor

to pay for any additional cleanup that may be required to meet the standards for the new land use.

"It's a positive step," said Martha Berry, of EPA Region IV, who monitors cleanup progress at bases, including NAS Jacksonville and Naval Station Mayport. "A few years ago, this type of discussion would have never taken place. Now there is an opportunity to satisfy the needs of the Navy, EPA and FDEP."

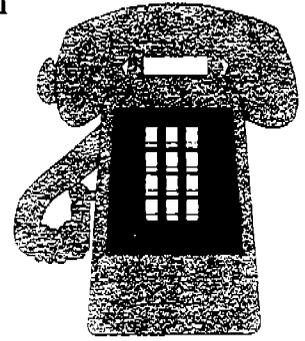
"There's an opportunity for installations to accomplish cleanup goals and at the same time save tens to hun of millions of dollars in cleanup costs," said Jerry Walmeyer, Regional Environmental Director for COMNAVBASE JAX. "With the maintenance of appropriate land uses, installations can apply less expensive cleanup alternatives to meet that land use and still accomplish their cleanup goals. We can do it cheaper and quicker, and still ensure the protection of human health and the environment."

At NAS Jacksonville, the ROD for the cleanup of Operable Unit One (OU1) has been on hold since August 1996. The remedial design for this cleanup is complete and the money has been funded for the actual cleanup. OU1 includes Potential Source of Contamination (PSC) 26 - the old Child Street Landfill, and PSC 27 - the old Transformer Storage Area. Once the LUR issue is resolved, the ROD can be signed, and work can proceed to clean up these two PSCs.

"We are continuing to get things done in our cleanup program," said Lancaster. "Resolving the LUR issue will allow us to complete cleanup work and achieve our goals."

## Who To Call

➤ For general questions or comments relating to NAS Jacksonville's Installation Restoration Program, contact Bill Dougherty, Installation Restoration Public Affairs Officer, NAS Jacksonville, 542-4032.



➤ For specific technical questions relating to the project and cleanup operations, contact Diane Lancaster, Installation Restoration Manager, NAS Jacksonville, 542-2717, ext. 119.

➤ For information about wells or to make a request that your drinking water well be tested, contact Grazna Pawlowicz, Duval Public Health Unit, City of Jacksonville, 630-3272.

➤ An information repository containing documents related to the Installation Restoration activities at NAS Jacksonville is available at the Webb Wesconnett Branch Library. Documents include work plans, summary of applicable laws, remedial investigation and cleanup reports, and other site-related documents. They are available at:

Webb Wesconnett Branch Library  
6887 103rd Street  
Jacksonville, FL 32210  
(904) 778-7305

Public Affairs Office  
P.O. Box 102  
Naval Air Station  
Jacksonville, FL 32212-0102

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