PART 2: INTRODUCTION TO THE SITE

2.1 Site Name, Location, and Brief Description

This Record of Decision (ROD) is for the Brown's Dump Site. Brown's Dump is located in the City of Jacksonville and consists of land where ash was deposited from City of Jacksonville municipal incinerators, including the former Mary McLeod Bethune Elementary School, an electrical substation of the Jacksonville Electric Authority (JEA), surrounding single family homes and multiple family complexes (e.g., apartments). The Site's coordinates are latitude 30° 21' 57" N and longitude 81° 41' 06" W. The United States Environmental Protection Agency's (EPA) Site Identification Number is FLD 980 847 016. The lead agency for this Site is the EPA.

In 1999, the EPA identified the City of Jacksonville, the Duval County School Board and JEA as Potentially Responsible Parties (PRPs). In September 1999, the City of Jacksonville voluntarily entered into an Administrative Order by Consent (AOC) with the EPA for the performance of a Remedial Investigation (RI) and Feasibility Study (FS). Therefore, this Site was never listed on the National Priorities List (NPL); rather, it is a Superfund Alternative Site (SAS) which, pursuant to the 1999 AOC, followed the National Contingency Plan (NCP) for the required investigation/study. Site remediation is to be funded by the City of Jacksonville.

The Site is approximately 80 acres in size. From the late 1940's until the mid-1950's, the Site was an operating landfill used to deposit ash from City of Jacksonville municipal incinerators. Investigations have indicated that the contaminated soil (and ash) is present within the Site at depths varying from the surface to greater than 20 feet below land surface (bls).[1] After closure of the landfill in1953, the property was obtained by the Duval County School Board in 1955, through condemnation procedures, for construction of a school. At approximately the same time and later, land surrounding the original landfill began to undergo development of residential homes and apartment complexes.

The original location of the deposition is centered on the northern portion of the former Mary McLeod Bethune Elementary School (See Photographs 1 and 2). School year 2000/2001 was the last year the school was open.

Regarding the reason for school closure, in a letter from the City to the School Board (dated December 8, 2000), the City made the following recommendation:

> "[t]he present schedule would require remediation efforts to start this summer, with no guarantees that work would or could be completed before the start of the school year. Accordingly, it is my

[1] Except for those homes located along Moncrief Creek and near the northern school property, most of the contamination above the RGs in residential areas is approximately 2 feet (or less) in thickness. The deepest contamination above the RGs is found on the northern school property.

recommendation that the school not be opened for the 2001-2002 school year."

In an EPA Fact Sheet dated February 2001, EPA stated that the decision to close the school was made by the local officials. The Fact Sheet also stated that "EPA did not make any suggestions or decisions to close the school."

The City's recommendation to the School Board was apparently based on the perceived impact remediation might have if cleanup occurred during the school year. There were also other, equal if not more important, reasons the School Board used in deciding to close the school. For example, it was reported that school facilities were severely out of date (e.g., could not link to the internet) and in dire need of general updating.

2.2 Site History and Enforcement Activities (i.e., activities that lead to current problem)

From the late 1940's until the mid-1950's, the Site was an operating landfill used to deposit ash from City of Jacksonville municipal incinerators. Subsequent sampling of the ash and soil contaminated with ash indicated that the main contaminant of concern (COC) in soil is lead, but other inorganic contaminants of concern also exist (e.g., arsenic). Burning and incineration processes can produce dioxin constituents, and dioxins have been identified as a COC in the Baseline Human Health Risk Assessment (BHHRA). Combustion of organic materials and other wastes in a municipal incinerator may also generate other contaminants that may be present at elevated levels. For instance, carcinogenic polyaromatic hydrocarbons (PAHs) have been identified as a COC in the BHHRA.

2.3. Previous Investigations

What ultimately became the Brown's Dump Site has been investigated numerous times over the years. The following is a summary of EPA's involvement and the involvement of the State of Florida.

2.3.1 Preliminary Assessment (PA), 1985

In 1985, EPA conducted a PA which concluded that the Site should be prioritized for possible federal cleanup as a low-priority. Subsequently, in November 1985, the EPA Environmental Services Division conducted a Site Screening Investigation (SSI), during which the following samples were collected:

- Three surface and subsurface soil samples
- Three sediment samples
- Three groundwater samples
- Two surface water samples

The results of these samples indicated high levels of lead in surface and subsurface soil samples. Additionally, lead was detected in sediment samples collected from Moncrief

Brown's Dump Record of Decision - Figure 1