On this day, May 28 *, 2020,*
the U.S. Environmental Protection Agency Determines that the

12.5-acre Facility Property at the Fairfax Street Wood Treaters Superfund Site Is Ready for Unrestricted Use

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This Ready for Reuse (RfR) Determination is for the 12.5-acre facility property of the Fairfax St. Wood Treaters Superfund Site ("Site") located in the city of Jacksonville, Duval County, Florida. This RfR Determination provides that the EPA and the Florida Department of Environmental Protection (FDEP) have made a technical determination that the 12.5-acre facility property cleaned up pursuant to the 2017 Record of Decision is ready for unrestricted use and the completed remedy will remain protective of human health and the environment. These conclusions are summarized in the attached Ready for Reuse Determination report for the Fairfax St. Wood Treaters Superfund site, _____, 2020. This RfR Determination remains valid unless new information becomes available to suggest that conditions at the Site are no longer protective of human health and the environment.

EPA's 2020 Final Close-Out Report confirms the successful remediation of all site surface soils to residential cleanup levels at the Fairfax St. Wood Treaters Superfund Site and removal of all contaminated facility debris from former operations. Because all hazardous wastes were remediated to meet cleanup standards, there are no operation and maintenance requirements, or limitations on reuse of the Site. The types of uses identified as protective in this RfR Determination remain subject to (i) applicable federal, state, and local regulation, including, but not limited to, zoning ordinances and building codes, and to (ii) title documents, including, but not limited to, easements, restrictions, and institutional controls.

This Ready for Reuse Determination is an environmental status report and does not have any legally binding effect, nor does it expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits of any party. EPA assumes no responsibility for reuse activities and/or any potential harm that might result from reuse activities. EPA retains any and all rights and authorities it has, including but not limited to legal, equitable, or administrative rights. EPA specifically retains any and all rights and authorities it has to conduct, direct, oversee, and/or require environmental response actions in connection with the Site, including but not limited to instances when new or additional information has been discovered regarding the contamination or conditions at the Site that indicate that the response and/or the conditions at the Site are no longer protective of human health or the environment for the uses identified in the Ready for Reuse Determination.

Ready for Reuse (RfR) Determination
Fairfax St. Wood Treaters Superfund Site

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I. Executive Summary

This Ready for Reuse (RfR) Determination is for a portion of the Fairfax St. Wood Treaters Superfund Site (the Site). The Site is located in Jacksonville, Duval County, Florida. The Site consists of a 12.5-acre property parcel (Real Estate # 046670-0000) and several off-site properties. These properties included a shared playground at two elementary schools and 51 residential parcels. The off-site properties were impacted by contamination that migrated via stormwater-contaminated soils. They were cleaned up as part of the Site's remedial action. They are not included in this RfR Determination since a change in use is not anticipated for these areas. This RfR Determination is for the 12.5-acre Site property where the wood-treating facility operated. The City of Jacksonville acquired the 12.5-acre property involuntarily in 2018 and remains the current owner.

The EPA and the Florida Department of Environmental Protection (FDEP) have made a technical determination that the 12.5-acre facility property has achieved the criteria for unlimited use and unrestricted exposure (UU/UE) and that the cleanup completed at the Site is protective of human health and the environment. Because Site surface soil has been remediated to residential cleanup levels, there are no operation and maintenance (O&M) requirements or limitations on the reuse of the Site. This RfR Determination remains valid unless new information about Site conditions arises that affects the appropriateness of the Site's UU/UE cleanup status.

The conditions summarized in this RfR Determination come from EPA decision documents for the Site, including the 2017 Record of Decision (ROD) and the 2020 Final Close-Out Report. The remedial actions have been performed in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP).[1]

Prior to cleanup by the EPA, the Site posed unacceptable human health risks for non-residential and residential exposures to chemicals of concern in surface soil such as arsenic, copper, chromium and polycyclic aromatic hydrocarbons (PAHs) on the Site. The EPA's selected remedy is protective of human health and the environment while allowing for UU/UE and, as documented in the 2020 Final Close-Out Report, the remedial action has achieved the cleanup levels based on residential use. The EPA has remediated all Site soils to residential cleanup levels. Any unacceptable risks to current and future workers and residents have been eliminated. The cleanup implemented at the Site is expected to remain protective of human health and the environment over the long term. No ongoing maintenance or institutional controls to limit exposure are required.

Documents pertaining to the Site and the RfR Determination are part of the Administrative Record file for the Site, which is available for public review at:

- Dallas Graham Branch Library, 2304 North Myrtle Avenue, Jacksonville, Florida 32209.
- The Site Documents & Data Section of EPA's site profile page at www.epa.gov/superfund/fairfax-st-wood-treaters.

Additional information can be obtained from Leigh Lattimore, the Remedial Project Manager for the Site, who can be reached at (404) 562-8768 or by email at lattimore.leigh@epa.gov.

[1] CERCLA cleanup requirements are specified in Title 42 of the United States Code, beginning with section 9601 (42 U.S.C. § 9601 et seq.). NCP requirements are stated in Title 40 of the Code of Federal Regulations Part 300 (40 CFR Part 300).

The types of uses identified as protective for the Site in this RfR Determination are subject to state and local regulation, including, but not limited to, zoning ordinances and building codes. Additional provisions regarding this RfR Determination are provided on Page 12.

EPA Region 4 and the FDEP issued this RfR Determination, effective May 28, 2020.

By: CAROL MONELL Digitally signed by CAROL MONELL Date: 2020.05.29 10:09:09 -04'00'

Carol J. Monell, Director
Superfund & Emergency Management Division
U.S. Environmental Protection Agency, Region 4

By: Tim J. Bahr Digitally signed by Tim J. Bahr Date: 2020.05.29 17:07:13 -04'00'

Tim J. Bahr, Director
Division of Waste Management
Florida Department of Environmental Protection

II. Site and Parcel Location

The Site is located at 2610 Fairfax Street in Jacksonville, Duval County, Florida (Figure 1). The Site consists of a 12.5-acre property parcel and several off-site properties. These properties included a shared playground at two elementary schools and 51 residential parcels. This RfR Determination addresses the 12.5-acre facility property, which consists of a single property parcel (Real Estate # 046670-0000), acquired involuntarily by the city of Jacksonville in 2018. The Site is located about 1.5 miles northwest of downtown Jacksonville, between West 16th Street and West 17th Street, in a predominantly residential area of Jacksonville.

The facility parcel is bordered to the north by St. Johns/CSX railroad tracks, to the east by Fairfax Street and residential properties beyond, to the south by West 14th Street and residential properties beyond, and the west by Susie E. Tolbert and R.V. Daniels elementary schools and by Pullman Court. Residential properties include single-family and multi-unit homes. Moncrief Creek is located about 1,000 feet west of the Site property. Overflow from the former retention pond on-site flowed into Moncrief Creek via a drainage pipe.

The Site is located above the Floridian Aquifer, which is an important source of drinking water for the state of Florida. The Floridian Aquifer underlies all of Duval County and is the most important source of fresh water in the area. The majority of residents located within a four-mile radius of the Site obtain drinking water from the city of Jacksonville's municipal water supply system.

III. Site Summary

Site and Contaminant History

A wood-treating facility operated by Wood Treaters, LLC, and its corporate predecessor, Wood Treaters, Inc. (Wood Treaters) operated on site. From 1980 to 2010, Wood Treaters operated a wood-treating facility that pressure-treated utility poles, pilings, heavy timber and plywood lumber products using the wood-treating preservative chromated copper arsenate (CCA). CCA is characterized by a bright green color and is composed of waterborne oxides, or salts, of chromium, copper, and arsenic. The copper serves as a fungicide, the arsenic serves as an insecticide, and the chromium binds the copper and arsenic to the wood. Based on the knowledge of the process and the contaminants at the Site, some of the CCA preservatives dripped onto the ground, which resulted in soil and sediment contamination. According to available records, Wood Treaters did not treat wood products with creosote or pentachlorophenol.

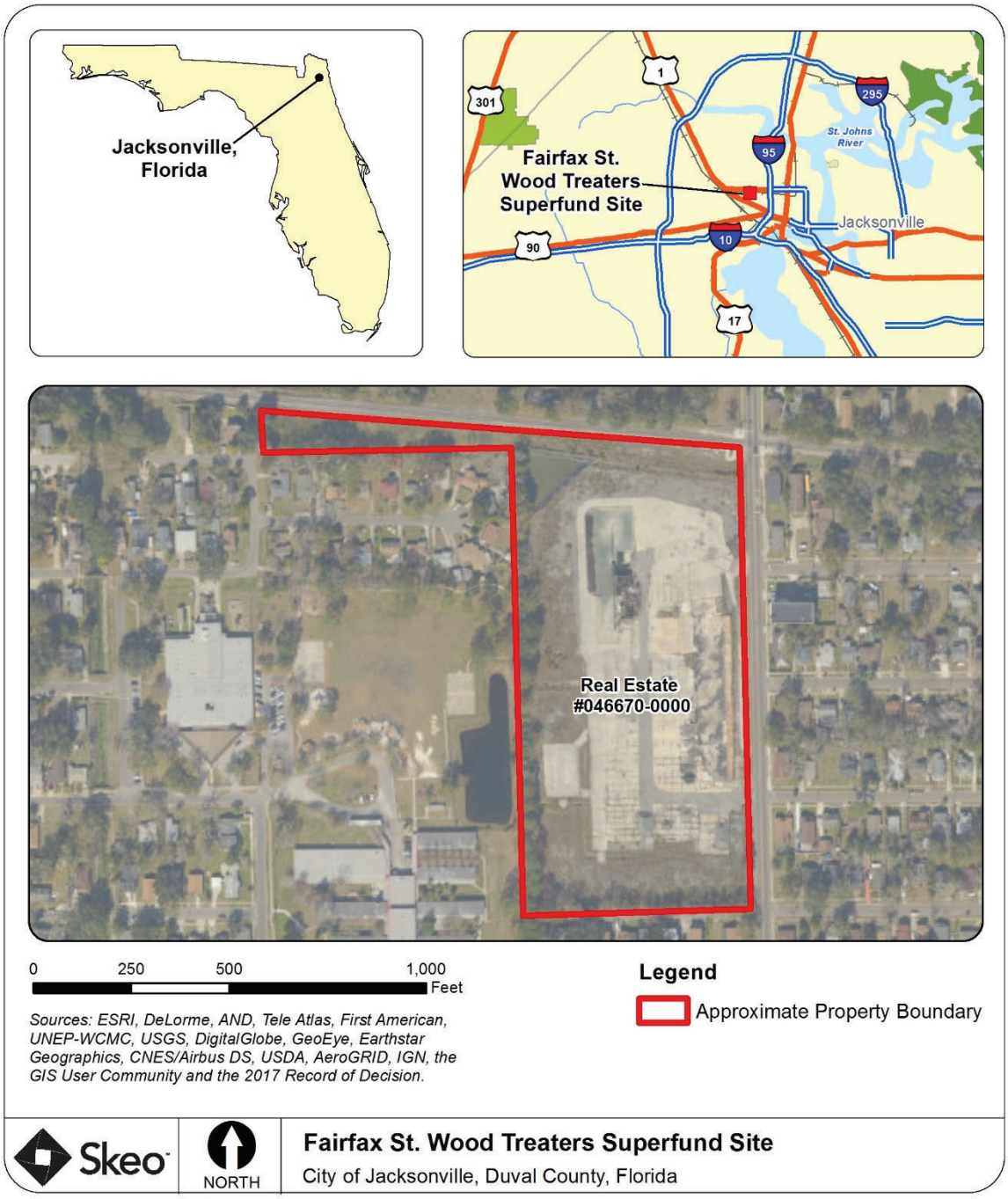
The primary contaminants of concern (COCs) at the Site are CCA constituents chromium, copper, and arsenic. Site investigations also identified PAHs from an unknown historical source beneath the Old Feed Building. PAH constituents including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene and indeno(l,2,3-cd)pyrene were identified in Site soils. Additionally, some soil contamination was considered as listed hazardous waste under the Resource Conservation and Recovery Act (RCRA).[2]

[2] Under 40 CFR §261.31, F035, listed hazardous waste is defined as "Wastewater (except those that have not come into contact with process contaminants), process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium."

In a typical pressure-treatment process, wood is placed into horizontal cylinders or tanks. Wood was pressure treated in the tanks for about six hours before being transferred to drying racks to drip dry, where the water evaporates, leaving only the salts. The salts react with the wood surface, rendering the wood insoluble. After drip drying in the process area, the treated wood was stored on the gravel areas along the northern, southern, and western portions of the property. Features of the facility included a wood-treating area, a pressure chamber, office building, parking lot, drip pad, former tank farm, storage building (also referred to as the Old Feed Building), storage yard, and retention pond. The facility building at the Site, which stored wood-treating product, was destroyed in a fire in January 2017. The City of Jacksonville acquired the contaminated property involuntarily in 2018.

Between 1980 and 1990, there was no stormwater management system at the facility. The topography of the Site property and the surrounding area are generally flat; therefore, stormwater was directed to the Susie E. Tolbert Elementary School retention pond or it flowed overland across the Site property. Uncontrolled stormwater contaminated with CCA from the wood-treating process is believed to have overflowed onto neighboring properties and Moncrief Creek during this time, resulting in CCA-contaminated soil and sediment. Site operators installed a stormwater collection and retention system in 1990. However, it is believed that stormwater continued to be released from the facility, carrying contamination onto neighboring properties.

Figure 1: Site Location Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding the EPA's response actions at the Site and is not intended for any other purpose.

Description of Risks Before Cleanup

Before EPA cleanup activities, the primary sources of contamination at the Site were wood-treating chemicals released from process areas as well as PAHs from an unknown historical source beneath the Old Feed Building. Unacceptable risks were estimated for non-residential and residential exposures to arsenic, copper, chromium, and PAHs on-site in soil. Further, residual waste material from drains and pipes below the process area posed an unacceptable risk due to the extremely high concentrations of metals. These wastes are classified as RCRA hazardous waste.[3]

On-site, eight different receptors were evaluated:

1. Future industrial/commercial workers
2. Future construction workers
3. Future utility workers
4. Current and future adolescent and adult trespassers
5. Future child recreationists
6. Future adolescent recreationists
7. Future adult recreationists
8. Future residents

Based on reasonably anticipated land uses (both current and future), people who might be exposed to the contaminated soil are future workers or residents. Future on-site residents, as well as on-site child recreationists, are likely to be exposed to surface and subsurface soil. The sum of cancer risks posed by COCs to future residents, future child recreationists, and future commercial/industrial workers exceeded the upper bound of EPA's Superfund program's acceptable risk range of 1.0×10^{-4} (1 in 10,000), the upper level of acceptable risk for carcinogens. Non-cancer risks to these same groups exceeded a hazard index of 1. The EPA considers any non-cancer risk greater than one to be unacceptable. Human health risk evaluations are summarized in Table 1.

[3] RCRA listed hazardous wastes included Listed Waste F035 and Toxicity Characteristic Waste D004 and/or D007.

Table 1. Possible Exposure Pathways Evaluated by the Human Health Risk Assessment

Medium	Exposure Pathway	Contaminants Posing Unacceptable Risks
Soil	Incidental ingestion, dermal contact with and inhalation of particulates from surface and subsurface soil.	Arsenic and PAH constituents, including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene and indeno(l,2,3-cd)pyrene
Groundwater	Incidental ingestion and dermal contact with groundwater (if present) at less than 10 feet below land surface (bls).	None
Surface Water and Sediment	Incidental ingestion and dermal contact with sediment and surface water in the on-site retention pond.	None*
* Surface water and sediment at the Site did not pose unacceptable risks to human health. However, the EPA performed cleanup actions based on unacceptable ecological risk factors. The screening-level ecological risk assessment indicated that concentrations of several constituents, primarily metals, in sediments in the on-site retention pond and Moncrief Creek exceeded ecological screening values for certain wildlife receptors.		

The Remedial Action addressed unacceptable risk from contamination in various media (e.g., soil) with completed exposure pathways. The exposure pathways evaluated were for future workers and residential use of the Site. The EPA and the FDEP expected that the selected remedy would be protective of human health and the environment while allowing for UU/UE.

Summary of Cleanup Activities

Table 2 provides a chronology of facility operations and EPA cleanup activities at the Site.

Table 2: Site Chronology

Event	Date
Wood Treaters, LLC began wood-treating operations at the Site.	1980
Wood Treaters, LLC installed a stormwater collection and retention system at the Site.	1990
Wood Treaters, LLC ceased operations at the Site and filed for bankruptcy.	July 2010
The EPA conducted an emergency response action at the Site.	August 2010
The EPA conducted time-critical removal activities at the Site and the adjacent Susie E. Tolbert and R.V. Daniels elementary schools' shared playground as well as at three residential properties.	March to October 2011
The Federal bankruptcy court approved a settlement agreement between the Site's Chapter 7 Trustee and the EPA, regarding Wood Treaters, LLC's bankruptcy.	2012
The EPA began a remedial investigation and feasibility study (RI/FS) for the Site.	January 2012
The EPA proposed the Site for listing on the Superfund program's National Priorities List (NPL).	March 2012
The EPA finalized the Site's listing on the NPL.	September 2012
The EPA completed the Site's RI.	2013
The EPA completed the Site's FS.	2017
The EPA released the Proposed Plan for public comment.	2017
Fire destroyed the wood-treating building on site.	January 2017
The EPA selected the Site's final long-term remedy in the ROD.	August 2017
The EPA initiated the Site's remedial action.	March 2019
The EPA completed the Site's remedial action.	October 2019

Emergency Response and Removal Activities

In July 2010, Wood Treaters' creditors forced the company into bankruptcy liquidation and the company abandoned operations at the Site. In August 2010, the EPA conducted an emergency response and a time-critical removal action at the Site, including investigation and removal of arsenic, copper and chromium contamination, at the request of the FDEP. Activities included pumping water out of the secondary containment area and retention pond, removing product in tanks, and collecting soil, surface water, sediment and waste samples.

A pre-remedial investigation (RI) at the Site in 2011, confirmed elevated levels of CCA in soil on site. Between March and October 2011, the EPA conducted removal activities at the Site, including excavation of areas not covered with concrete along the northern, western and southern portions of the 12.5-acre facility property. Contaminated fine materials from the gravel were disposed of as non-hazardous waste off-site. The EPA power washed and spread gravel back on top of the excavation surface to control dust and limit exposure to the soil. The on-site retention pond water was drained, the water was treated and disposed of, and pond sediments were partially excavated and disposed of. About 150,000 gallons of CCA-contaminated water was transported for reuse by a wood-treating facility in Savannah, Georgia. Remaining contaminated water was treated and neutralized on-site with titanium dioxide and disposed of in the City of Jacksonville sewer system with concurrence from the Jacksonville Electric Authority.

Remedial Activities

To protect human health and the environment, the EPA proposed listing the Site on the National Priorities List (NPL) on March 15, 2012. The EPA finalized the Site's listing on the NPL on September 18, 2012, making it eligible for additional study and cleanup resources under the EPA's Superfund program. In 2012, a federal bankruptcy court in Jacksonville, Florida, approved a settlement agreement between the Site's Chapter 7 Trustee and the EPA regarding the bankruptcy of Wood Treaters, LLC. The EPA has led site investigation and cleanup activities in cooperation with the FDEP and the Florida Department of Health.

From 2011 to 2013, the EPA conducted an extensive RI to define the nature and extent of the contamination at the facility property and nearby residential properties. Groundwater sample results collected during the RI were compared with EPA Safe Drinking Water Act maximum contaminant levels (MCLs). Soil samples were analyzed and the results were compared with EPA's residential soil regional screening levels (RSLs), the FDEP's soil cleanup target levels (SCTLs), and site-specific background levels for each of the contaminants detected.[4] Surface water and sediment samples were collected from the Site retention pond and Moncrief Creek. The sediment and surface water samples were analyzed, and the results were compared with the 2003 FDEP sediment quality assessment guidelines for Florida inland waters, threshold effect concentrations, and Florida ambient water quality criteria. Also, a human health risk assessment was conducted to define the risks posed by the contamination and to identify the areas that required cleanup. The EPA completed the Site's feasibility study (FS) in 2017. The FS developed remedial alternatives for evaluation using the NCP criteria. The EPA issued a Proposed Plan and sought community input on the recommended remedial alternative for the Site.

The EPA selected the Site's final remedy in a ROD signed on August 22, 2017. The cleanup focused on addressing the source material remaining on-site (residual material in pipes and drains), building debris, retention pond sediments, and contaminated soils on the facility property, as well as at the adjacent impacted properties surrounding the facility property. Site cleanup levels for contaminated media listed in the ROD are based on the FDEP SCTLs for residential direct exposure except for arsenic, which is based on a background concentration. These cleanup levels are protective of human health and the environment and address the unacceptable risks identified in the human health risk assessment and the screening-level ecological risk assessment. The EPA and the FDEP expected the selected remedy to be protective of human health and the environment and to allow for UU/UE.

Remedial design activities ended in 2018. The EPA led cleanup activities to address soil and sediment contamination from March through October 2019. Remedial work at the 12.5-acre facility property included building demolition, removal of underground storage tanks, piping, and drains, and removal of pavement and concrete covering areas requiring excavation (Figure B-1). Demolition debris included remnants of the facility building, concrete footers and paving, a large steel pressure vessel, seven underground storage tanks, and the subsurface drains and piping running through the Site. All demolition materials, as well as residual waste material found in drain lines, were characterized to determine appropriate means of disposal or reclamation through recycling. All existing monitoring well abandonments on site were completed in compliance with the FDEP's well abandonment regulations.

Approximately 49,200 cubic yards of soil were excavated from 287 grids on-site and backfilled with an estimated 34,352 cubic yards of clean common fill. About 2,100 cubic yards of clean topsoil was

[4] SCTLs are defined in in Table II of Florida Administrative Code (FAC) Chapter 62-777.

imported to finish excavated areas. The topsoil was fertile, friable, natural soil typical of topsoil from the area. Confirmation samples verified the achievement of cleanup goals for soil across the Site. Figures B-3a through B-3d show the locations of the confirmatory samples.

Redevelopment/Reuse History

Following two years of removal actions and investigations at the Site, the EPA sponsored a reuse planning process to gather community input, inform cleanup decisions, and identify Site stewardship options. The process brought together elected officials and staff from the City of Jacksonville, residents of the mid-Westside neighborhood, and local community development corporations to develop a reuse framework for the Site. The framework will help guide the Agency's evaluation of cleanup options and local redevelopment efforts.

The 2013 reuse framework found that the 12.5-acre facility property may be suitable for mixed-use redevelopment. Based on analysis of surrounding land uses, site suitability and stakeholder input received to date, reasonably anticipated future land uses for the facility property are likely to include mixed uses with a residential component and open space. The EPA is sponsoring an update to the reuse framework in 2020, following completion of cleanup activities in October 2019. The EPA anticipates completing the updated reuse framework in June 2020. The facility property is not currently in use.

IV. EPA's Basis for the RfR Determination

The EPA based the RfR Determination for the 12.5-acre facility property on documents produced during remedial activities at the Site. These documents provide evidence that the Site is ready for UU/UE and that the Site's remedy will remain protective of human health and the environment over the long term. The EPA's RfR Determination is based primarily on the 2020 Final Close-Out Report, which verifies that Site conditions comply with the 2017 ROD findings and design specifications and that cleanup activities performed at the Site are sufficient to achieve protection of human health and the environment. The remedial action achieved the cleanup levels based on residential use, which will allow UU/UE of the property. Site reports can be found in the Site's Administrative Record, which is available for review at Dallas Graham Branch Library, located at 2304 North Myrtle Avenue, Jacksonville, Florida 32209, and on the Site Documents & Data Section of the EPA's site profile page at www.epa.gov/superfund/fairfax-st-wood-treaters.

The risks associated with direct contact with soils and sediments have been eliminated. All contaminated site surface soils exceeding the cleanup levels were removed (excavated) and groundwater monitoring confirms that a response action is not necessary since concentrations of contaminants are below drinking water standards. Site surface soil has been remediated to residential cleanup levels, which will allow for UU/UE.

V. Ongoing Limitations and Responsibilities Established by the EPA

Institutional Controls

The remedial action achieved the cleanup levels based on residential use that will allow UU/UE at the Site property. Therefore, institutional controls or land use controls are not needed. Additionally, land use controls and five-year reviews are not necessary.

Operation and Maintenance (O&M) Requirements

Since the cleanup achieved UU/UE levels, there is no need for O&M activities.
However, the owner of the property, currently the City of Jacksonville, should employ good housekeeping practices to ensure proper drainage of stormwater from the Site.
Such activities are expected to include routine Site maintenance, including Site mowing, inspecting, and potentially clearing on-site drainage features, including ditches and the retention pond, inspecting for evidence of positive drainage and possible erosion, and maintaining the placed sod and vegetation.

VI. Provisos

This RfR Determination is an environmental status report. It does not have any legally binding effect and does not expressly or implicitly create, expand or limit any legal rights, obligations, responsibilities, expectations or benefits of any party. The EPA assumes no responsibility for reuse activities and/or for any potential harm that might result from reuse activities. The EPA retains any and all rights and authorities it has, including, but not limited to, legal, equitable or administrative rights. The EPA specifically retains any and all rights and authorities it has to conduct, direct, oversee and/or require environmental response actions in connection with the Site, including, but not limited to, instances when new or additional information has been discovered regarding the contamination or conditions at the Site that indicate that the response and/or the conditions at the Site are no longer protective of human health or the environment for the types of uses identified in the RfR Determination.

The types of uses as identified as protective in this RfR Determination remain subject to (i) applicable federal, state and local regulations, and to (ii) title documents, including, but not limited to, easements, restrictions and institutional controls.

APPENDIX A: Acronym List

CCA	Chromated Copper Arsenate
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Contaminant of Concern
EPA	United States Environmental Protection Agency
FDEP	Florida Department of Environmental Protection
MCL	Maximum Contaminant Level
mg/kg	Milligrams per Kilogram
NCP	National Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
PAH	Polycyclic Aromatic Hydrocarbons
RCRA	Resource Conservation and Recovery Act
RfR	Ready for Reuse
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RSL	Regional Screening Level
SCTL	Soil Cleanup Target Level
UU/UE	Unlimited Use and Unrestricted Exposure

APPENDIX B: Figures from the Site's Final Close-Out Report

Figure B-1: Map of Site Layout Prior to Remediation

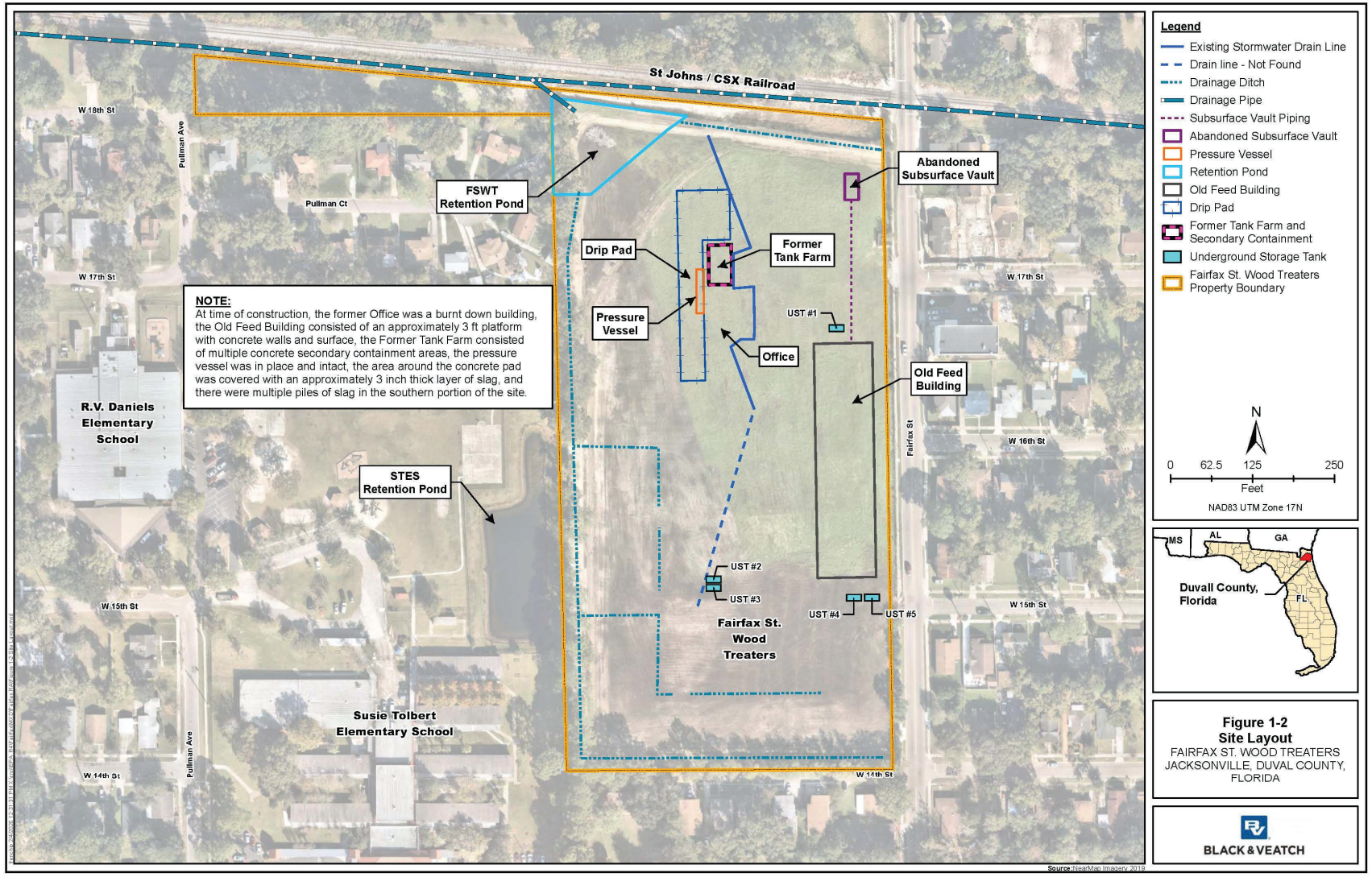


Figure B-2: Remedial Action Overview Map, Including Off-Site Residential Property Cleanups

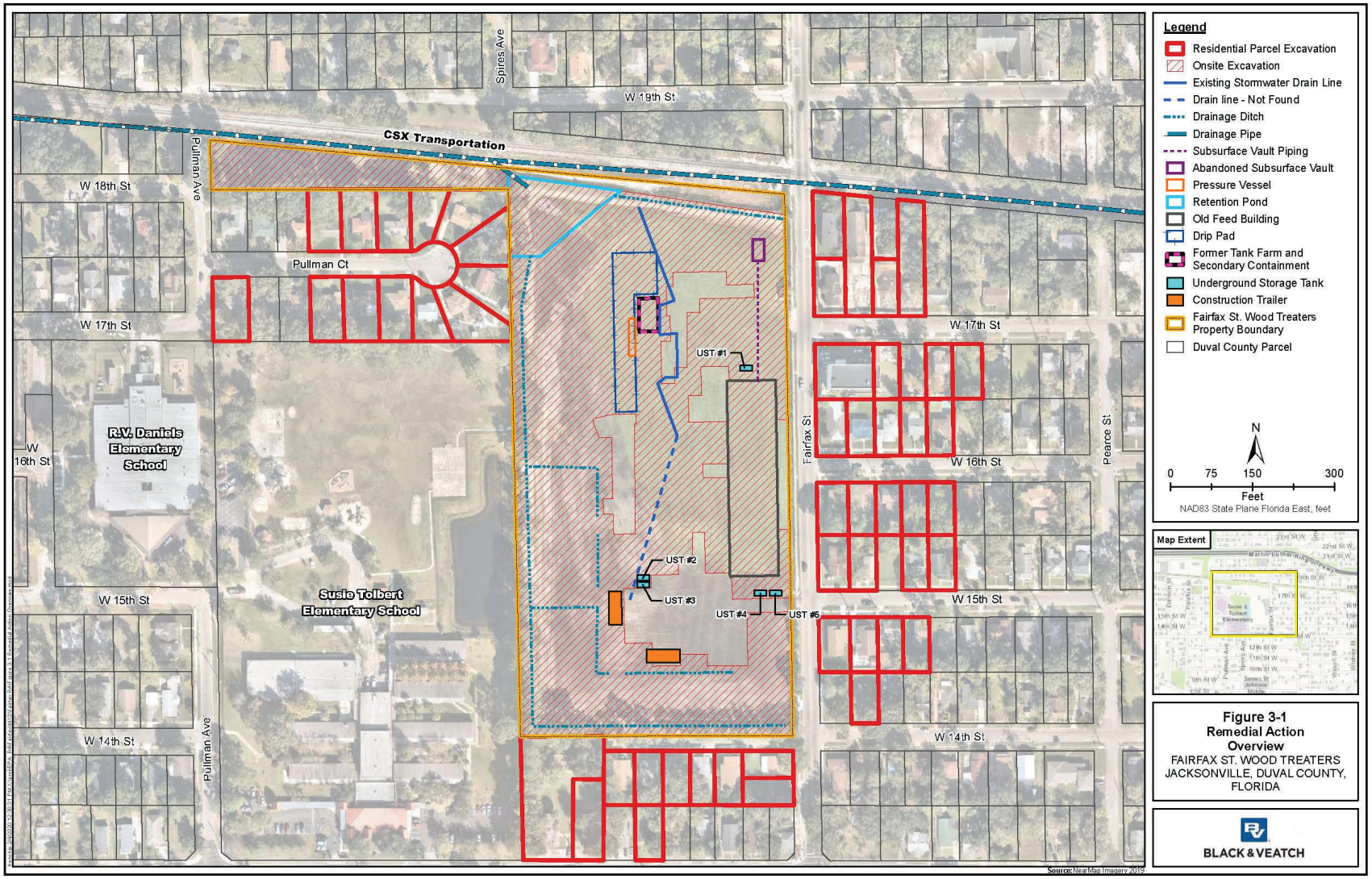


Figure B-3a: First of Four Maps Showing Locations of Remedial Confirmation Sampling

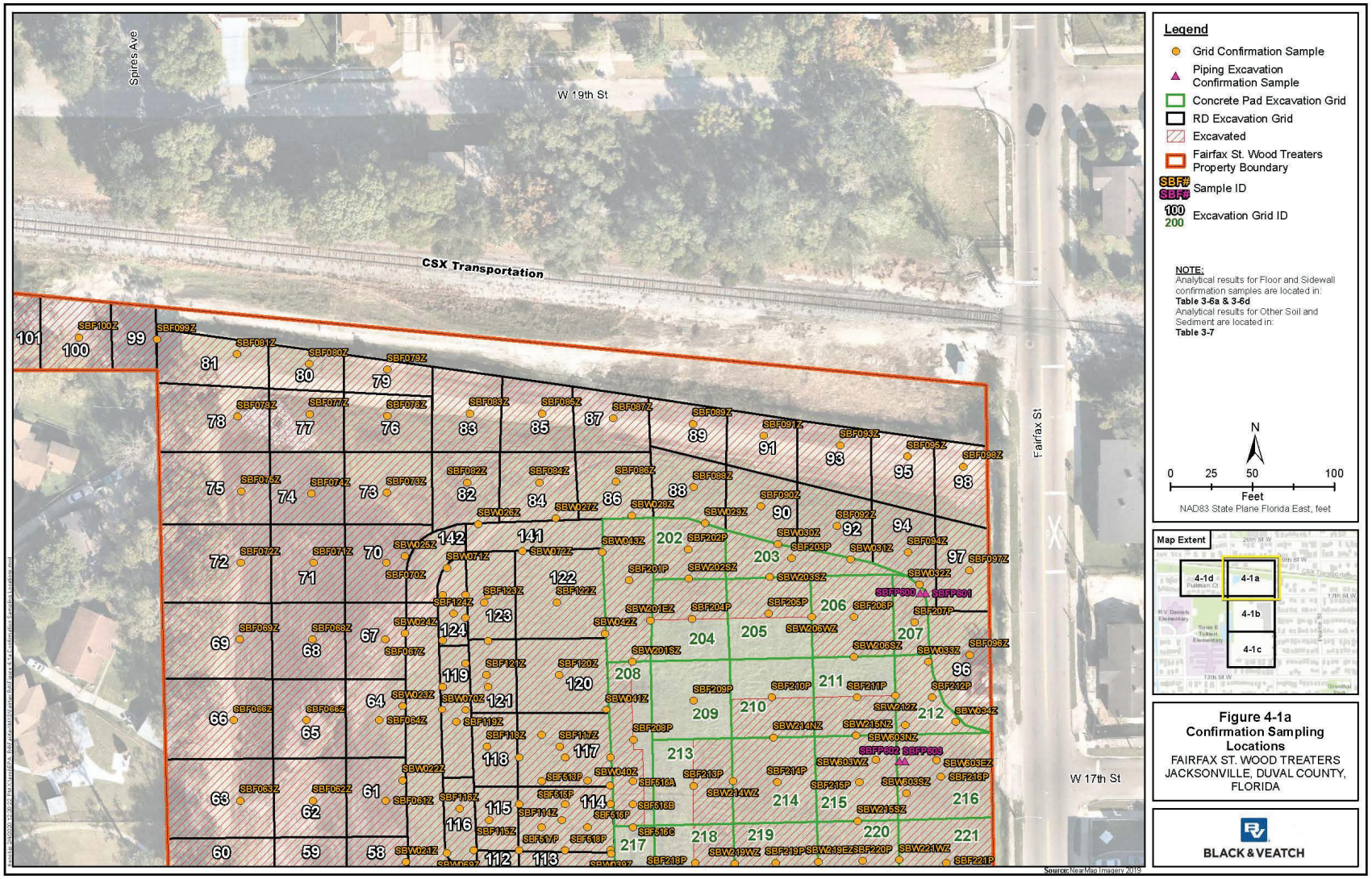


Figure B-3b: Second of Four Maps Showing Locations of Remedial Confirmation Sampling

Figure B-3c: Third of Four Maps Showing Locations of Remedial Confirmation Sampling

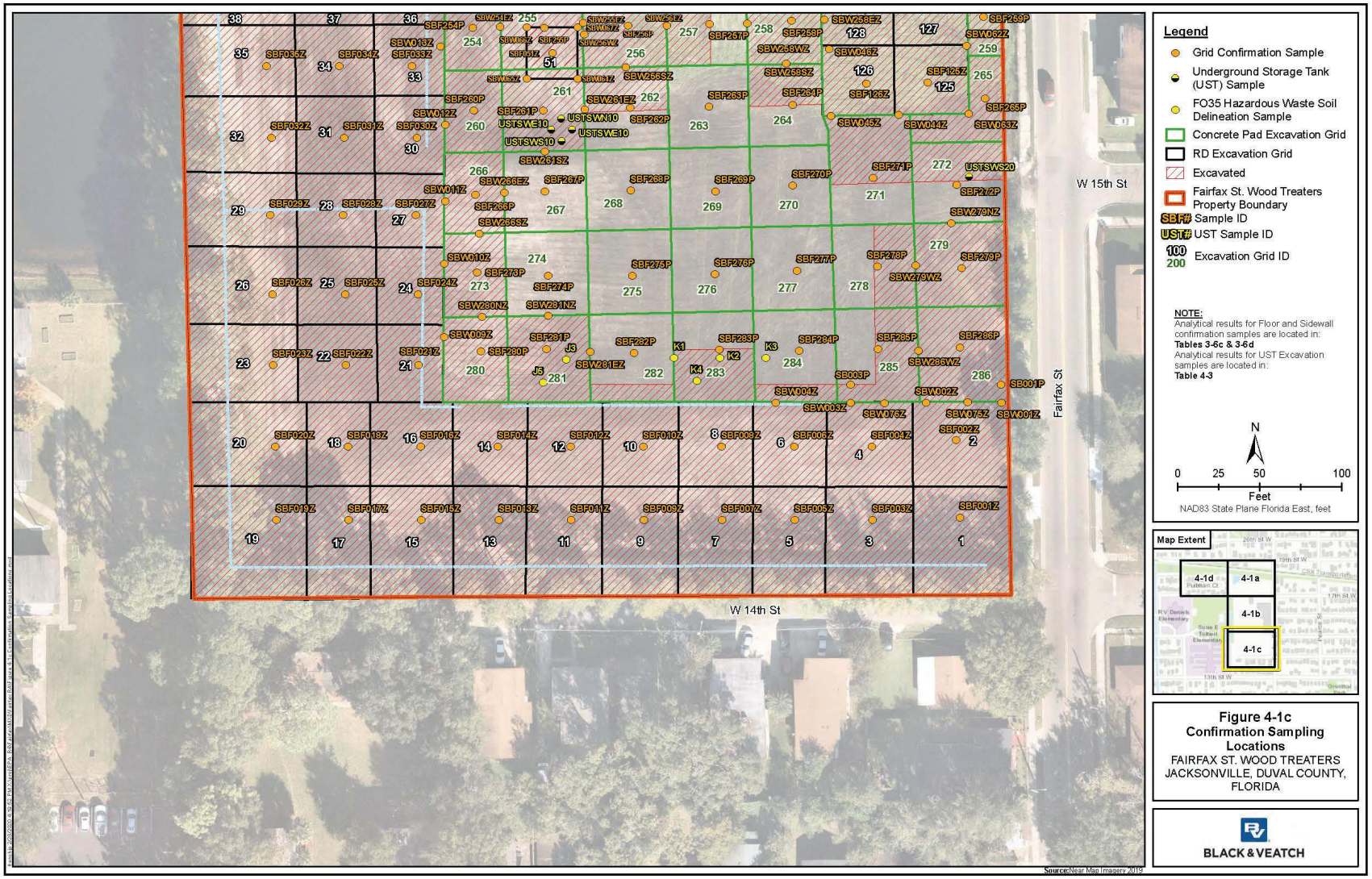


Figure B-3d: Fourth of Four Maps Showing Locations of Remedial Confirmation Sampling