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NS MAYPORT
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING ECOLOGICAL RISK ASSESSMENT METHODOLOGY IN DRAFT
RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION GENERAL
INFORMATION REPORT VOLUMES 1 AND 2 NS MAYPORT FL
5/16/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0091

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 16, 1995

Mr. David Driggers
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC. 29419-9010

file: gir_eco.doc

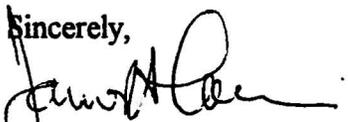
RE: Comments on Ecological Risk Assessment Methodology in Draft RFI General Information Report, Volumes I and II, NAVSTA Mayport

Dear David:

Ms. Jane Fugler has completed her review of the Ecological Risk Assessment Methodology portion of the Draft General Information Report dated February 1995 (received February 8, 1995). I have attached her memorandum in this regard. Her comments, along with those in my letter of April 24, 1995 complete our comments on the report.

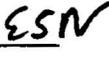
Thank you for the opportunity to review these documents. If you have questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,


James H. Cason
Remedial Project Manager

Attachments (1)

cc: Cheryl Mitchell, NAVSTA Mayport
Jay Bassett, EPA Region IV, Atlanta
John Mitchell, FDEP Natural Resource Trustee
Peggy Layne, P.E., ABB-ES, Tallahassee

TB ³ JJC  ESN 

**Florida Department of
Environmental Protection****Memorandum**

TO: James Cason, DOD Facilities Technical Review

THROUGH: Jim Crane, Bureau of Waste Cleanup *JJC*

FROM: Jane Fugler, Hazardous Waste Sites Technical Review *JF*

DATE: May 2, 1995

SUBJECT: Review of Ecological Risk Assessment Methodology for Mayport Naval Station

I have reviewed the ecological risk assessment methodology portion of the February, 1995 'RCRA RFI, General Information Report for Mayport Naval Station'. In general the proposed approach is fine. However, in future assessments the recent EPA draft guidance "Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessment", issued September 26, 1994, should be considered. Also, a few items in this section are not clearly discussed. These concerns are discussed below.

1. Page 2-49, during the identification of receptors, state and federal threatened and endangered species should be identified. Also, a list of species expected in this region should be included, as well as a list of the final selection of represented species and the reasoning for the selection.
2. Page 2-51, ¶1 discusses the elimination of analytes detected in <5% of the samples analyzed. This is acceptable, as long as the possibility of hot spots is eliminated.
3. Page 2-59, ¶1: all ECPCs in all media should be considered for each representative wildlife and aquatic species.
4. Page 2-60, ¶2: FDEP sediment guidance concentrations should also be considered.

/jf