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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY ASSESSMENT SAMPLING VISIT REPORT FOR GROUPS 1 AND 2 AND GROUP 4  
SOLID WASTE MANAGEMENT UNITS NS MAYPORT FL  
6/7/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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Governor

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Virginia B. Wetherell  
Secretary

June 7, 1995

Mr. David Driggers  
Code 1852  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Re: Naval Station Mayport, Duval County, Jacksonville, Florida

1. Draft Resource Conservation and Recovery Act Facility Assessment Sampling Visit Report Groups I and II, April, 1995
2. Draft Resource Conservation and Recovery Act Facility Assessment Sampling Visit Report Groups IV, May, 1995

Dear Mr. Driggers:

We have reviewed the above referenced documents and provide the following comments.

RFA Sampling Visit Groups I and II

1. Table 3-4 (CPCs in Surface Water Samples at SWMU 49), p. 3-11, screens constituents to Ambient Water Quality Criteria (AWQC), Florida Surface Water Quality Standards (FSWQS), and background (BG). Where was the background sample location? All background sampling locations for all media should be included in the text and on figures.
2. Section 3.5.2 (Recommendations), p. 3-33, discusses what possible action should be taken at SWMU 49; either no further action (NFA) or a monitoring program. The fact that SWMU 49 is a retention pond which receives stormwater runoff from various areas of the base presents an issue of any stormwater discharge problems.

Stormwater discharge areas tend to collect many hazardous substances from many various sources and can provide ecological and human health risks, as well as

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toxicity to biota. Retention basins may often become wetland environments which begin to provide habitat for aquatic species and foraging habitat for terrestrial species (e.g., wading birds).

To eliminate or reduce these risks based upon the exceedences of surface water standards and criteria, and sediment guidance values, we recommend dredging and disposal of the current sediment and future maintenance dredging based upon monitoring (semi-annual) results of the surface water and sediment. We also recommend locating all stormwater discharge areas which do not have some form of retention prior to discharge into a wetland or surface water body. Those which do not have a retention basin should be evaluated for possible retention basin construction to eliminate or reduce potential risks to the environment.

3. Figure 4-1 (1992 sediment and Surface Water Sampling Locations at SWMU 50), p. 4-9, should include the location of groundwater monitoring wells if any were established. Also, the surface water outfalls for these basins should be included in the figure.
4. Section 4.4 (Preliminary Risk Evaluation)
  - a. Under the subsection for surface water the document indicates on p. 4-20 that the FSWQS for arsenic is 36  $\mu\text{g}/\text{l}$ , and on p. 4-22 that there is no FSWQS for zinc. The FSWQS for total arsenic is 50  $\mu\text{g}/\text{L}$  and for zinc is 86  $\mu/\text{L}$ .
  - b. Under the subsection for sediment p. 4-22 - 4-25) many of the constituents are evaluated based upon the FDEP sediment quality assessment guidelines (SQAGs) no observed effects level (NOEL) (MacDonald, 1993). The contaminants include benzo(a)anthracene, chrysene, fluoranthene, pyrene, antimony, cadmium, lead, and silver. These values have been updated and a copy of the new SQAGs is attached. We also recommend screening based upon the threatened effects level (TEL) rather than the NOEL value. The TEL is more equivalent to the NOAA effects range low (ER-L) values.

In addition to the constituents already evaluated, benzo(a)pyrene, arsenic, and copper

should be included in the evaluations. the TEL was exceeded for benzo(a)pyrene at sampling station SD05, and for arsenic and copper at SD02.

Also, on p. 4-25 the document indicates a sampling station in the St. Johns River (SJR) was used as background. We question the SJR station, as being appropriate as this is a contiguous open water system entirely different then SWMU 50.

#### RFA Sampling Visit Groups IV

1. The Executive Summary (p. iii) indicates the oil water separators will be evaluated under by the Underground Storage Tank (UST) Program and in accordance with the states underground petroleum rule (Chapter 62-770, F.A.C.). This may be appropriate, however, solvents and waste oils were often discharge into oil/water separators. Should contamination be discovered which is not petroleum based then that specific location should be returned to the Installation Restoration (IR) program.
2. Figure 2-1 (SWMU 47, Oily Waste Collection System), p. 2-3, should show the location of other SWMUs (i.e., SWMU 9) within the vicinity. Also, a smaller scale map should be made which better defines the site. This map should include the location of the lift stations and riser joints, along with near vicinity SWMUs. Delineating which portions of the line are gravity flow and forced flow should be shown.
3. A figure showing the approximate sampling locations for all media should be included.
4. Figure 2-2 (SWMU 53, Sanitary Sewers in Industrialized Area), p. 2-11, should show the location of other SWMUs (i.e., SWMU 9) within the vicinity. Also, a smaller scale map should be made which better defines the site. All the sanitary sewer lines should also be shown on the map along with the portions of the line which are gravity flow and forced flow.
5. Figure 2-4 (SWMU 55, Storm Sewers in Industrialized Areas), p. 2-23, only shows the 17 outfalls at the turning basin. Any other outfalls which may lead into retention basins, wetlands, the SJR

and other surface water bodies should be shown, and sampling stations established at these locations. Also, other SWMUs in the vicinity of the storm sewers should be delineated.

Also, on p. 2-24, the document states that "an inventory of the storm sewer system was completed in 1994." The storm sewer system should be included in this figure.

6. Section 2.4.1 (Exploration Program Summary - SWMU 55), p. 2-24, indicates sediment samples will be taken from the unlined drainage ditches which lead to 17 outfalls. As previously stated in comment #5, these outfalls are all in the Turning Basin. Any other outfalls should also be located and sampled.

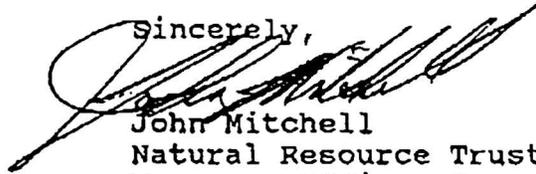
7. Section 2.4.2 (Sampling and Analytical Program - SWMU 55), p. 2-25, again mentions only the 17 outfalls in the turning basin. Refer to comments #5 and #6.

Also, the last paragraph of this section that ecological toxicity testing may be required if contamination is discovered. This should indicate what parameters will be used to make this decision (i.e., SQAGs, ER-Ls, FSWQS, etc.) or make referral to the preliminary risk characterization section of the document.

8. Section 4.0 (Preliminary Risk Characterization), p. 4-2, recommends using the NOEL and PEL values of the SQAGs for sediment risk characterization analysis. Instead of using the NOEL values, we recommend using the TEL values.

We appreciate the opportunity to be involved with the remedial plans and actions at Mayport Naval Station. Should you wish to discuss this further, please contact me at (904)487-2231.

Sincerely,



John Mitchell  
Natural Resource Trustee Project  
Manager, Office of  
Intergovernmental Programs

June 7, 1995  
Naval Station Mayport  
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cc: Pat Kingcade, FDEP  
Eric Nuzie, FDEP  
Brian Cheary, FDEP  
Region IV ERC, NOAA  
Jim Lee, DOI  
Jay Bassett, EPA  
Cheryl Mitchell, USN

Reference

MacDonald, D.D.. 1994. *Approach to the Assessment of Sediment Quality in Florida Coastal Waters, Volume 1 - Development and Evaluation of Sediment Quality Guidelines*. Florida Department of Environmental Regulation, Tallahassee, FL. 126pp.