

N60200.AR.009456  
NAS CECIL FIELD  
5090.3a

TRANSMITTAL FOR COPY OF LETTER SENT TO FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION ABOUT POTENTIAL WETLANDS IMPACT AT POTENTIAL  
SOURCE OF CONTAMINATION 39 (PSC 39) NAS CECIL FIELD FL  
6/26/2000  
TETRA TECH



**TETRA TECH NUS, INC.**

661 Andersen Drive ■ Pittsburgh, Pennsylvania 15220-2745  
(412) 921-7090 ■ FAX (412) 921-4040 ■ www.tetrattech.com

*Distort will let us know  
if they want.  
Since it is a "CERCLA" site,  
the administrative requirements  
will be less stringent.*

PITT-06-0-104

June 26, 2000

Project 0039

Commander  
Department of the Navy  
SOUTHNAVFACENGCOM  
Attn: Mr. Mark Davidson  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Reference: CLEAN Contract No. N62467-D-0888  
Contract Task Order 0078

Subject: Letter to FDEP about Wetlands at PSC 39  
Naval Air Station Cecil Field  
Jacksonville, Florida

Dear Mr. Davidson:

Please find attached one copy of a letter sent to FDEP about potential wetlands impact at PSC 39.

Copies have also been distributed to the Partnering Team Members as indicated below.

If you have any questions, please call Joe Logan at 412-921-7231 or me at 412-921-8916.

Sincerely,

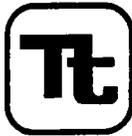
*Mark P. Speranza*  
Mark P. Speranza, P.E.  
Task Order Manager

MPS/kf

Enclosure

- cc: S. Glass, SOUTHDIV (1 copy)
- D. Vaughn-Wright, U.S. EPA (1 copy)
- M. Deliz, FDEP (1 copy)
- S. Ross, J.A. Jones (1 copy)
- D. Wroblewski (Cover Letter Only)
- Mark Perry/File

070-78



TETRA TECH NUS, INC.

910 Clopper Road, Suite 400, Gaithersburg, MD 20878-1399  
(301) 258-6000

June 5, 2000

Mr. Steve Sabia  
Florida Department of Environmental Protection  
7825 Baymeadows Way  
Suite 200B  
Jacksonville, Florida 32256

Subject: Wetland Impacts from Proposed Removal Action for PCB-  
Contaminated Sediment in Ditch at Site PSC 39, NAS Cecil Field

Dear Mr. Sabia:

Tetra Tech NUS is under contract to Southern Division, Naval Facilities Engineering Command to design a removal action addressing PCB-contaminated sediment in a man-made ditch on the air field at the Naval Air Station (NAS) Cecil Field. The ditch receives stormwater, originating from the airfield, that is discharged from a headwall located approximately 200 feet south of the east-west runway surface. The stormwater flows southward through the ditch into natural wetlands located more than 800 feet south of the runway. The proposed removal action involves excavating sediment from the bottom of a 300-foot segment of the ditch, beginning at the headwall. The grade and vegetation in the wetlands would be restored once the removal action was completed. Additional details are provided below.

NAS Cecil Field is on the National Priorities List (NPL) of sites identified by the U.S. Environmental Protection Agency (EPA) as requiring priority cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The proposed removal action addresses Site PSC 39, one of several sites identified by the Navy for cleanup under its Installation Restoration Program. The Navy believes that, despite temporary disturbance to wetland vegetation within the ditch, the removal action would in the long-term benefit ecological receptors in the ditch and in natural wetlands downstream of the ditch.

Delineation of Affected Wetlands: Wetlands, as defined by the U.S. Army Corps of Engineers (33 CFR 328) and EPA (40 CFR 230), occur at NAS Cecil Field Site PSC 39 only within ditch. The bottom width of the ditch averages approximately 15 feet. The dense vegetation in the center of the ditch is dominated by common cattail (*Typha latifolia*) with willows (*Salix* sp.) and other woody shrubs (Photo 1). This hydrophytic vegetation extends up each of the side slopes to the ditch to a point corresponding to

Mr. Steve Sabia  
Florida Department of Environmental Protection  
June 5, 2000  
Page 2

the ordinary high water mark defined by channel flow. The estimated average width of the wetlands (and other waters of the United States) in the ditch is 18 feet.

The side slopes of the ditch are very steep, exceeding 1H:2V at most points. In many places, the side slopes are covered with riprap-like concrete rubble and supports only sparse cover by ruderal vegetation. The uplands surrounding the ditch support upland grasses, forbs, and sedges such as broomsedge (*Andropogon virginicus*) (Photo 2) and have a history of routine mowing. Photo 3 shows an aerial view of Site PSC 39.

The spatial extent of wetlands and waters of the State of Florida, as defined in Chapter 62-340 F.A.C., at Site PSC 39 correspond to the extent of federally regulated wetlands and waters of the United States.

Because the wetland boundaries are sharply defined by side slopes to the ditch, and because the ditch is readily resolved on aerial photographs (Photo 3), the Navy did not consider it necessary to mark the wetland boundaries in the field for land survey. The top portion of Drawing 1 is a sketch showing a typical cross section of the ditch illustrating the horizontal extent of wetlands. Note that wetlands, as demarcated by hydrophytic vegetation and by the ordinary high water mark of channel flow in the ditch, extend only to an elevation just past the toe of each side slope.

Description of Proposed Removal Action: The proposed removal action is being designed to excavate sediment from the ditch to attain a PCB concentration in sediment no higher than 1 part per million (ppm). Drawing 2 illustrates that PCB concentrations exceeding 1 ppm were found in sediment samples collected as far as 200 feet south (downstream) from the headwall.

The area of wetland (and waters of U.S./Florida) subject to disturbance by the removal action is very small. Assuming that no more than 300 feet of the ditch would be subject to excavation and an average wetland width of 15 feet, no more than 5,400 square feet (0.12 acre) of wetland (waters of the U.S./Florida) would be disturbed. Assuming an average excavation depth of 2 feet, the volume of excavated sediment would be no more than 400 cubic yards.

Mr. Steve Sabia  
Florida Department of Environmental Protection  
June 5, 2000  
Page 3

Equipment used to perform the excavation would be staged on uplands no more than 100 feet east or west from the centerline of the ditch. The equipment would generally operate from the uplands adjoining the ditch, although some equipment could have to descend to the bottom of the ditch to efficiently accomplish the excavation. The side slopes of the ditch would not generally be disturbed, but it could be necessary to grade a single access roadway descending tangentially down one of the side slopes to allow equipment to reach the bottom of the ditch.

Proposed Mitigation Measures: To minimize sedimentation of surface water in the ditch and in downstream wetlands, surface flow through the ditch would be temporarily diverted into a pipe for the duration of excavation activities. The pipe would be laid over the surface at the bottom of the ditch and would be removed as soon as the excavation activities are completed.

Standard erosion and sedimentation control practices would be employed throughout the removal action. Disturbance of surface soils and existing vegetation, especially on the side slopes to the ditch, would be minimized to that necessary to efficiently accomplish the removal action. Super silt fence would be installed between the wetlands and areas of soil on the side slopes that are disturbed by the removal action. Areas of surface soil on the side slopes that are disturbed by the removal action would be temporarily stabilized using hay and annual grass seed if permanent stabilization is not possible within two weeks. Such areas would be permanently stabilized using perennial grass seed within one week following the completion of the removal action. Additional erosion and sedimentation control measures required under state and local regulations would be utilized.

The approximate original grade would be restored to the wetlands using topsoil following completion of the removal action. Any topsoil placed in the ditch would not be obtained from areas infested with *Phragmites* or other invasive plant species. Indigenous wetland grasses, sedges, and other plants would be restored to the ditch bottom through seeding or planting. The ditch would be monitored until indigenous vegetation, planted or volunteer, had established natural cover over the restored wetlands.

Mr. Steve Sabia  
Florida Department of Environmental Protection  
June 5, 2000  
Page 4

The Navy requests that the FDEP review the wetland impacts necessary to accomplish the proposed removal action and indicate whether any further authorizations are required. The Navy hopes that because the proposed removal action will be performed in the context of CERCLA, and because the FDEP will have reviewed the wetland impacts as part of its overall review of the removal action, that formal application for permits required under Section 404 of the Clean Water Act and under state and local regulations.

Please call me at (301) 258-8798 if you have any questions regarding wetlands issues or Joe Logan at (412) 921-7090 if you have any general questions about the project.

Sincerely,

A handwritten signature in cursive script that reads "J. Peyton Doub".

J. Peyton Doub, CEP, PWS  
Professional Wetland Scientist #358

**NAS CECIL FIELD SITE PSC 39  
PHOTOGRAPHS**

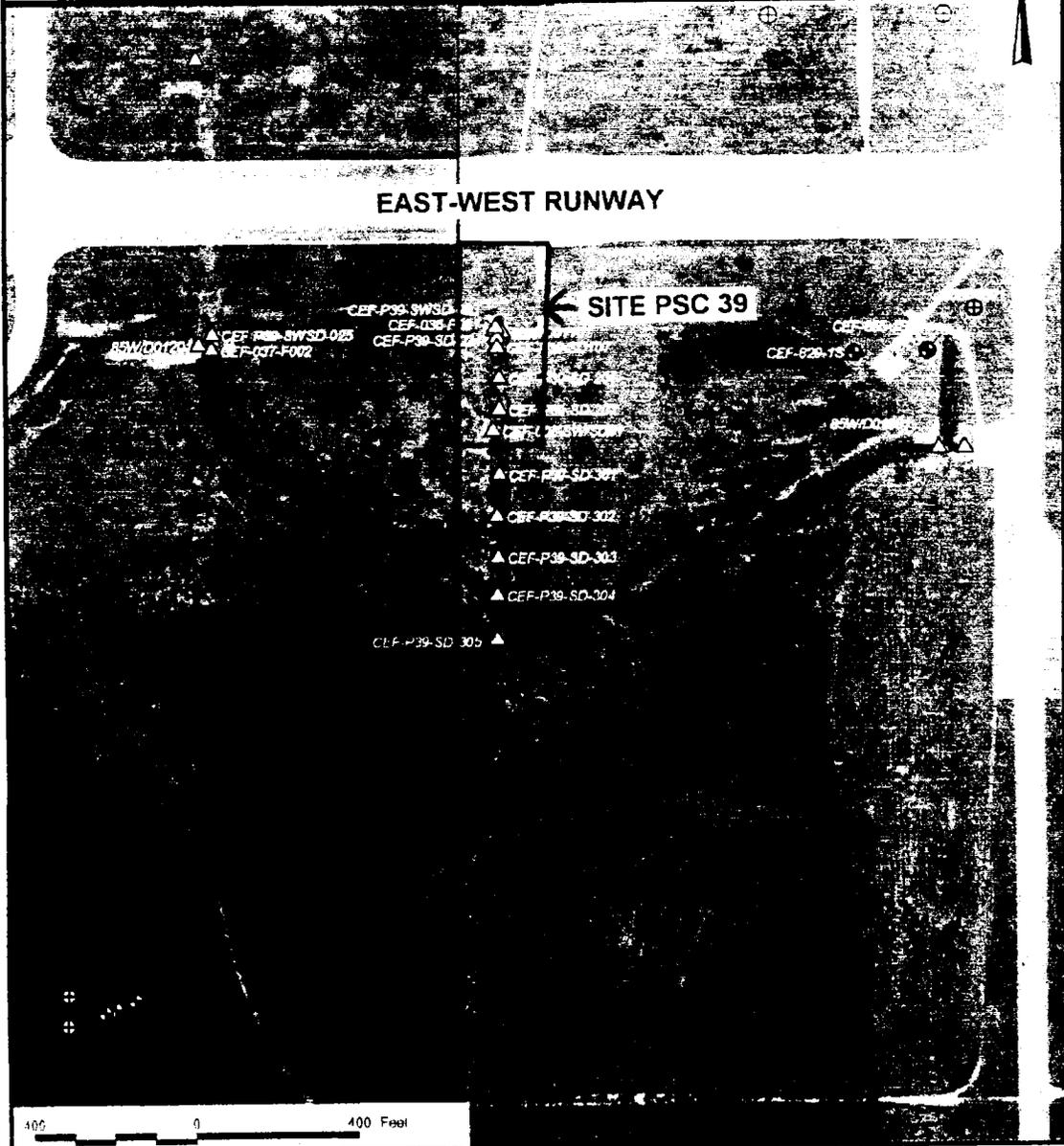


**Photo 1: NAS Cecil Field Site PSC 39, Ditch looking southward (downstream) from headwall. Dominant vegetation in ditch bottom is common cattail.**



**Photo 2: Overview of upper end of ditch, NAS Cecil Field Site PSC 39, showing headwall and side slopes with concrete fragments and ruderal upland vegetation.**

PHOTO 3  
AERIAL PHOTOGRAPH SHOWING NAS CECIL FIELD SITE PSC 39



DRAWN BY _____	DATE _____		OUTFALL 11 SAMPLE LOCATION PSC 39, MB 18 FLIGHTLINE OUTFALLS NAVAL AIR STATION CECIL FIELD JACKSONVILLE, FLORIDA	CONTRACT NUMBER 0039	
CHECKED BY _____	DATE _____			APPROVED BY _____	DATE _____
COST/SCHEDULE AREA				APPROVED BY _____	DATE _____
SCALE AS NOTED				DRAWING NO. _____	FIGURE _____
				REV 0	