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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL DRAFT REMEDIAL INVESTIGATION AND FEASIBILITY  
STUDY FOR POTENTIAL SOURCES OF CONTAMINATION 3 AND 42 (PSC3) (PSC42)  
OPERABLE UNIT 2 (OU2) NAS JACKSONVILLE FL  
10/3/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Lawton Chiles  
Governor

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

Virginia B. Wetherell  
Secretary

October 3, 1994

Mr. Dana Gaskins  
Code 1857  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Re: Final Draft Remedial Investigation and Feasibility Study,  
Potential Sources of Contamination (PSCs) 3 and 42 at  
Operable Unit 2, NAS Jacksonville, September, 1994

Dear Mr. Gaskins

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

#### Section 4.0 (Focused Risk Evaluation)

No ecological risk assessment (ERA) was performed related to the surface water and sediment at PSC 42 (WTP Polishing Pond). The sediment guideline Effects Range Medium levels were exceeded for Antimony, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Silver, and Zinc. This level of contamination is likely providing injurious impacts to any organisms in the surface water and sediment, and to any biota which forage at this site. Wading birds have been observed in the polishing pond, and some of the detected metals bio-magnify up the food chain. A quantitative ERA should be performed for the surface water and sediment at this site.

#### Table 5-1 (Synopsis of Federal and State Location Specific ARARs for PSC 42)

The table states that "the polishing pond and the area surrounding the pond does not conform to the definition of a wetland as outlined in 40 CFR Part 6." However, it appears to meet the definition of a wetland as defined in Florida Statute (FS) 373.019 (17). This determination can be made

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by the department's NE District, the St. Johns Water Management District, and local government. The site should not be excluded as wetland until a determination is made.

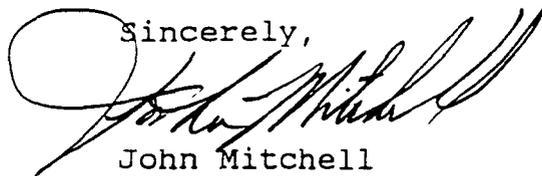
Section 7.0 (Detailed Analyses of Alternatives)

Each of the alternatives present a possible contingency plan which leaves a portion of the pond as a potentially functioning wetland system. We recommend this not be a "contingency," but be part of whichever alternative is chosen. If the pond is determined to be a wetland, mitigation will also be needed.

In addition, whether or not the pond is a designated wetland, the polishing pond has provided a likely source of injury to any biota which inhabited or foraged within it. Due to this probable injury, the creation of a clean viable wetland/pond habitat would partially compensate for the injury. As co-natural resource trustees under CERCLA, this compensation for injury needs to be considered. If the polishing pond is designated a wetland, then compensation is needed above and beyond the determined mitigation.

We appreciate our involvement in the remedial process at NAS Jacksonville. Should you have any questions, please contact me at (904) 487-2231.

Sincerely,



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

cc: Eric Nuzie, FDEP  
Pat Kingcade, FDEP  
Waynon Johnson, NOAA  
Jim Lee, DOI  
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