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NAS JACKSONVILLE  
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LETTER ENUMERATING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
CONCERNS WITH DRAFT SAMPLING EVEN REPORT NUMBER 17 ELECTROFISHING  
FISHERIES NAS JACKSONVILLE FL  
7/20/1993  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

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

Virginia B. Wetherell  
Secretary

July 20, 1993

Mr. Joel G. Murphy  
Code 18213  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 10068  
Charleston, South Carolina 29411-0068

Re: Draft *Sampling Event Report Number 17, Electrofishing Fisheries Investigation at Selected Water Bodies, NAS Jacksonville*

Dear Mr. Murphy,

We appreciate the opportunity to be involved in the remediation plans for Naval Air Station Jacksonville. Following are our comments for the above referenced document.

We only have a few specific issues to address:

1. Section 4.1.2 (Surface Water Physical Parameters)  
Water hardness should be one of the defined parameters.
2. Section 4.2 (Sediment Assessment)  
Grain size should have been described.
2. Table 4-6 (Summary Analytical Results for Biota Samples at Lake Casa Linda)  
Analytical results for mercury and potassium are missing from the table. This limits our ability to comment fully on the results.
3. Appendix A - Sampling and Analysis Plan (Section 2.8 - Surface Water and Sediment Sampling)

The plan does not define the sampling methodology for either surface water or sediments. This needs to be clarified. Were the surface water samples taken near the top, middle, or bottom of the water column; a combination of top, middle, and

bottom; or all three? Were the sediment samples taken with a ponar grab and the grab sample mixed; or was a core sample taken and a portion of the core sampled?

Overall, the results of the document show pollution of the surface water and sediments at concentrations above Federal Ambient Water Quality Criteria (AWQC), Florida Surface Water Quality Standards (FSWQS) - Class III, and National Oceanic and Atmospheric Administration (NOAA) Sediment Guidelines for multiple contaminants (pesticides, PCBs, and inorganics). The biota tissue analysis shows uptake of the same contaminants in the fish sampled.

Many of these contaminants will bio-accumulate up the food chain. Although there were few aquatic avifauna observed at the time of sampling, this does not mean that birds and terrestrial species do not forage in these water bodies. As stated in the document, the noise from the outboard motor and the generator would likely have chased many species away during the time of the sampling event. Also the time of day may have an impact, as many species forage during early morning hours or later in the evening; some species are nocturnal.

Although fish were not discovered in the Polishing Pond, some aquatic avifauna and terrestrial species were observed. A data gap which exists is a macro-invertebrate and benthic analysis. Further sampling is needed to determine the number, type, and diversity of benthic organisms in these water bodies. An analysis of the tissue for all of the parameters analyzed in this study also should be performed on the benthic organisms. Also, the drainage pathway from Lake Casa Linda and Lake Scotlis, all the way to the St. Johns River, needs to be sampled and analyzed for surface water and sediments. The area of the outfall from the Polishing Pond into the river needs to be sampled and analyzed as well.

It appears from this study, that some form of natural resource injury is likely occurring within these water bodies, and potentially up the food chain. Some form of remediation is needed for the sediments and surface water for protection of biota and human health.

In the future, only one copy of all documentation and correspondence needs to be sent to the state natural resource trustees. We can be contacted at:

Florida Department of Environmental Protection  
Marjorie Stoneman Douglas Building  
3900 Commonwealth Boulevard, M.S. 46  
Tallahassee, Florida 32399-3000

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We appreciate the ability to review the plans for N.A.S. Jacksonville. Should you have any problems or concerns with our comments and requests, please contact me at (904) 488-0784.

Sincerely,



John Mitchell  
Project Manager, Office of  
Intergovernmental Programs

cc: Eric Nuzie, FDEP  
Pat Kingcade, FDEP  
Waynon Johnson, NOAA  
Jim Lee, DOI  
Kevin Gartland, USN  
Doyle Brittain, EPA