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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FOCUSED FEASIBILITY STUDY ADDENDUM SITE 1  
PENSACOLA FL  
7/28/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of  
**Environmental Protection**

**Memorandum**

**TO:** John Mitchell, Remedial Project Manager,  
Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section

**FROM:** Greg Brown, P.E., Professional Engineer II, Technical  
Review Section

**DATE:** July 28, 1997

**SUBJECT:** Focused FS Addendum, Site 1; NAS Pensacola, Florida.

JR For TB  
YTB

I reviewed the subject engineering document dated June 26, 1997 (received June 27, 1997). I have the following minor comments:

1. The Alternatives are inspired by the violation of a surface water standard by a single chemical stressor (i.e., iron). The ERA summary in the subject document did not report any actual or potential ecological effects or any assessment endpoints describing the ecological entities and values threatened by the stressor. It may be useful to quantify the ecological effects of the observed stressor via field observations and bioassays. Alternatives could be chosen in the context of explicit ecological assessment endpoints.
2. Alternative 2 will modify the functions of Wetland 3 for wastewater treatment of landfill leachate. Construction and operations would destroy other wetland values such as wildlife habitat. The alternative proposes off-site mitigation using wetland preservation to compensate for these losses. Wetland preservation, however, is not typically used for mitigation except in special circumstances. Preservation may be desirable when the preserved wetland offers unique values and is threatened by development. Preservation may also be acceptable if the preserved wetland helps to achieve goals of a watershed management plan if one exists. The Navy should therefore consider other forms of compensatory mitigation such as on-site restoration or enhancement. Discussions with the Mobile District ACOE and NW District FDEP may help refine the options.
3. If site conditions permit, site grading and hydroperiod control using an outlet structure at the culvert may achieve the same results as the proposed dike system describe in Alternative 2. The wetland geometry and flow regime could be modified to enhance iron retention in Wetland 3 while enhancing other wetland functions. Consultation with a competent wetland scientist may be useful.

WETLAND BANKING

If you have questions, please call me at (904) 488-3935.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FOCUSED FS ADDENDUM, SITE 1, NAS PENSACOLA, FLORIDA**

(Comments from Greg Brown, P.E. dated July 28, 1997)

**COMMENT:**

1. The Alternatives are inspired by the violation of a surface water standard by a single chemical stressor (i.e., iron). The ERA summary in the subject document did not report any actual or potential ecological effects or any assessment endpoints describing the ecological entities and values threatened by the stressor. It may be useful to quantify the ecological effects of the observed stressor via field observations and bioassays. Alternatives could be chosen in the context of explicit ecological assessment endpoints.

**RESPONSE:**

The Florida Department of Environmental Protection representative to the Tier I partnering team has indicated that any exceedance of a state surface water quality standard for iron will require action. The addendum now reflects the use of interceptor trenches to capture groundwater exceeding iron surface water quality standards before it can enter Wetland 3 and treat it prior to discharge.

**COMMENT:**

2. Alternative 2 will modify the functions of Wetland 3 for wastewater treatment of landfill leachate. Construction and operations would destroy other wetland values such as wildlife habitat. The alternative proposes off-site mitigation using wetland preservation to compensate for these losses. Wetland preservation, however, is not typically used for mitigation except in special circumstances. Preservation may be desirable when the preserved wetland offers unique values and is threatened by development. Preservation may also be acceptable if the preserved wetland helps to achieve goals of a watershed management plan if one exists. The Navy should therefore consider other forms of compensatory mitigation such as on-site restoration or enhancement. Discussions with the Mobile District ACOE and NW District FDEP may help refine the options.

**RESPONSE:**

The Tier I partnering team has agreed that mitigation is a negotiated penalty that has no relation to the decision process for the FFS and it will therefore be removed from discussion

in the Site 1 FFS Addendum. Since mitigation is being removed from the Addendum the comment on the form of mitigation is no longer applicable.

**COMMENT:**

3. If site conditions permit, site grading and hydroperiod control using an outlet structure at the culvert may achieve the same results as the proposed dike system describe in Alternative 2. The wetland geometry and flow regime could be modified to enhance iron retention in Wetland 3 while enhancing other wetland functions. Consultation with a competent wetland scientist may be useful.

**RESPONSE:**

Comment noted. The design of any wetland modification will be refined during the remedial design phase of the project if Alternative 2 is the selected Alternative in the ROD.

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