

US EPA ARCHIVE DOCUMENT

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## ACRONYMS

CINCLANTFLT	Commander in Chief, U.S. Atlantic Fleet
CNO	Chief of Naval Operations
USACOE	U.S. Army Corps of Engineers
CWA	Clean Water Act
USEPA	U.S. Environmental Protection Agency
FDEP	Florida Department of Environmental Protection
MAYPORT	Naval Station Mayport
NAVFAC	Naval Facilities Engineering Command
NELP	Navy Environmental Leadership Program
QMB	Quality Management Board
RAB	Restoration Advisory Board

## I INTRODUCTION

**A. Description of Facility/Community/Geographic Area.** The Naval Station Mayport (MAYPORT) installation encompasses over 3,400 acres, can accommodate up to 34 ships, and is homeport for more than 14,000 Sailors and civilians making it the third largest fleet concentration in the United States. We serve more than 70 tenant commands, detachments and organizations, as well as nearly 50,000 family members and retirees who live locally. Major tenants include 3 battle group staffs, 21 ships and 5 helicopter squadrons. We provide complete aviation maintenance services, as well as full berthing/hotel services for ships. Other services include security, family services, housing, civil engineering, recreation, childcare, supply, religious support, information systems and fire and rescue response.

MAYPORT is one of Jacksonville, Florida's largest employers with an economic impact exceeding \$1.03 billion annually. The installation is situated on the northern end of a peninsula bounded by the Atlantic Ocean to the east, the St. Johns River to the north, and the Intracoastal Waterway to the west. Except for the small Town of Mayport to the west of the installation, the naval station occupies the entire peninsula (Appendix I). MAYPORT has nearly a full mile of beachfront, 4.5 miles of river shoreline, and almost half of the 3,400 acres is classified as wetlands, brackish marshlands, or beaches. Manatees, ospreys, sea turtles, Northern Right Whales, and other endangered or threatened species share the area with military personnel and operations.

Protecting and preserving this fragile environment entrusted to us while performing our military mission is a challenge that MAYPORT has met. To enhance the Navy's environmental stewardship philosophy, MAYPORT embraced the opportunity to serve as the east coast Navy Environmental Leadership Program (NELP) Base and be a testbed for new and innovative technology and focused management that addresses the full spectrum of environmental concerns Navywide.

MAYPORT remains active in the community by co-chairing a Restoration Advisory Board (RAB) and holding quarterly Environmental Luncheons that are attended by state and local regulators. These luncheons serve as an informal method of communicating MAYPORT's mission and provide an "up close and personal" view for the regulatory community to see the requirements of running a naval station. These activities serve as two-way communications and build an atmosphere of trust and partnership.

In recognition of our environmental leadership qualities, in 1997 the Chief of Naval Operations (CNO) presented us with an Honorable Mention Award in Pollution Prevention and in 1998 presented us with both Pollution Prevention and Environmental Quality Awards.

**ENVVEST Proposal Background.** The MAYPORT Turning Basin, where the ships are moored, is located south of the river with an entrance channel that enters the river immediately west of the south jetty (Appendix I). The basin is hydraulically linked to the river and ocean through the entrance channel. To maintain adequate depths for naval ships, maintenance dredging of the entrance channel and basin is performed on an 18-month cycle with approximately 600,000 cubic yards of silt and silty sand material removed each cycle. From the early 1970's until 1993 material removed during the dredging events was placed in upland holding areas located in the southwest portion of the base. Those areas reached capacity in 1993 and MAYPORT has been utilizing an offshore ocean disposal site for storage since that time.

In an effort to eliminate ocean disposal and the environmental concerns of water quality and impacts on marine animal habitats associated with this type of disposal, MAYPORT's ENVVEST project is based on beneficial re-use of dredged material. We plan to streamline the dredging permit process and demonstrate the feasibility of technologies

that will allow the environmentally conscientious re-use of material currently stored in the upland cells which in turn will provide for perpetual future use of these cells thereby eliminating the need for ocean disposal.

**B. Contact Information.** Additional information on the ENVVEST proposal can be obtained from the following point of contact:

Cheryl Mitchell  
Environmental Division Director, N4E  
Naval Station Mayport  
Mayport, FL 32228-0067

Phone: 904-270-6730 (x11), Fax 904-270-7398

Email: [cmitchell@nsmayport.spear.navy.mil](mailto:cmitchell@nsmayport.spear.navy.mil)

Our web page with additional information on MAYPORT and its environmental initiatives is:  
<http://www.mayportnelp.com/>.

## **II PROJECT DESCRIPTION**

**A. Summary or Overview of Project.** MAYPORT's existing U.S. Army Corps of Engineers (USACOE) permit for ocean disposal requires modification every three years. This permitting process takes about one year and, as stipulated by Section 103 of the Marine Protection and Research and Sanctuaries Act (MPRSA), requires extensive and costly chemical, biological, and physical analyses of sediment samples from the MAYPORT turning basin. USACOE reviews the studies and the history of operations in the basin as part of the permit but the U.S. Environmental Protection Agency (USEPA) must approve the data prior to maintenance dredging.<sup>1</sup> Current approval for ocean disposal expires January 2001. USEPA concurrency for this permit has been granted and expires in January 2002. The other dredge maintenance permits and their schedules are: 1) Florida Department of Environmental Protection (FDEP) permit 161862189, expiration date 21 October 2001; and 2) USACOE permit 199004179 (IP-RP), expiration date 25 September 2001. As part of our ENVVEST proposal, we propose to demonstrate that due to the superior pollution prevention programs we currently have in place, we can extend and streamline this permitting process by staging all permits to begin/renew at seven and fourteen year intervals. Please refer to Section B below on the specific elements.

Another part of the ENVVEST proposal is the pursuit of future elimination of the ocean disposal requirement. MAYPORT will investigate and demonstrate two methods of beneficial re-use of dredge material during FY99 that will focus primarily on emptying the existing two upland storage cells which are at capacity thus providing space for future dredging events. These two methods of re-use will utilize state-of-the-art technology that processes the dredge material and other solidification materials into construction building blocks and artificial reef material. The requirement for mixing

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<sup>1</sup> Ocean disposal became necessary only recently, as upland disposal sites at MAYPORT reached capacity. However, basin material was analyzed in 1985 when an emergency dredging cycle made it necessary to use the off shore site. The report *Ecological Evaluation of Proposed Oceanic Discharge of Dredged Material from Mayport Harbor, Florida*, dated July 1985, indicated that the material was ecologically acceptable as judged by the toxicity and bioaccumulation criteria employed by the evaluation. The latest report dated December 15, 1993, *Final Report for Obtaining and Analyzing Sediment Samples, Water Samples, and Elutriate Samples From Mayport Harbor, Florida* showed similar results. These findings allowed USEPA and USACOE to approve the 1996 and 1999 dredge cycle for ocean disposal.

with other materials offers us the opportunity to seek out a partnership with the Jacksonville Electric Authority (JEA), who operates the City of Jacksonville's electrical generating plant, in an effort to utilize the excess fly ash produced by their coal-fired generating plant in lieu of landfilling on their own property.

## **B. Specific Elements.**

**Streamline Permit Process.** Currently there are three permits with three different timelines, which makes for a confusing process during the renewal and public comment period. MAYPORT's proposal is to extend the permit timeline to the maximum extent allowed. The ocean disposal permit, if still required, would be extended to seven years and the other permits for dredging would be extended on an equivalent timeframe to fourteen years. MAYPORT and the USACOE would still validate on a three-year interval that no substantial changes to operations occurred and no environmental impacts from operations occurred. As part of this environmental review MAYPORT would document the pollution prevention initiatives implemented during that time and provide metrics reports on the process improvements.

**Re-use of Dredge Material.** The two upland material holding cells are at capacity which necessitates ocean disposal and the associated analytical testing required for that permit. MAYPORT's proposal involves utilizing innovative technologies that re-use dredge materials to create construction building blocks and artificial reef material. As part of this effort we will create a partnership with JEA for use of the electrical plant's fly ash which can be used in the solidification process for both the blocks and the reef material. Another partnership will be forged with a local community stakeholder, the Mayport Partnership Council, by providing the building blocks for their new community center, which is the cornerstone of an on-going initiative to enhance the visibility of their historical, quaint fishing village.

## **III PROJECT CRITERIA**

### **A. SUPERIOR ENVIRONMENTAL PERFORMANCE**

#### **Tier 1: Baseline Environmental Performance without invest**

MAYPORT, as the CNO designated Navy Environmental Leadership Program's (NELP) East Coast activity, is charged with leading the Navy into the 21<sup>st</sup> century by developing innovative technologies and state-of-the-art management practices to protect the environment and natural resources. Under this progressive program we have implemented or are planning implementation of several pollution prevention initiatives that are demonstrated to substantially improve the environmental performance of our operations. A few of these are: Computer Based Training (CBT), an oil spill prevention tool utilizing CD-ROM training techniques for shipboard fueling evolutions which has attributed to the zero spill rate for ships that utilize it; procurement/utilization of a natural gas, mobile fire trainer that has eliminated air emissions and potential groundwater contamination of open-pit fuel fire training; high vacuum, low pressure (HVLP) paint spray recovery system for both aircraft and ship applications; non-destructive depainting and recovery system for both aircraft and ship applications; oily rag recycling program for both aircraft and shipboard processes to cut our number one waste stream in half; design/installation of in-line contaminant sensors for the sanitary and oily waste collection systems; and the conversion of main boiler plants to natural gas to reduce air emissions and remove the requirement for a Title V permit.

## **Tier 2: Superior Environmental Performance With Envvest**

The superior performance achieved under the ENVVEST project implementation is the future elimination of ocean disposal and the associated water quality issue as well as potential impact to an endangered species issues - the Northern Right Whale; both of these are priorities identified by local community stakeholders. The number one issue/concern identified in recent community relations interviews of these same stakeholders was water quality of the surrounding bodies of water – the St. Johns River and the Atlantic Ocean. Implementation of our project would demonstrate the Navy's and regulatory community's understanding and pro-active approach to respond to community concerns by minimizing the water quality issues and implementing additional measures to protect the Northern Right Whale habitat. The creation of an offshore reef habitat will be an added benefit for the local recreational fishing community who already utilizes MAYPORT's surrounding waters for pleasure and business. Protection and improvement of these natural resources and associated fisheries in the area was the number two issue/concern identified during the community interviews.

Another benefit in this project implementation is the reduction in material that will have to be landfilled by the City of Jacksonville's generating plant. Since we propose to utilize the fly ash in the solidification process for both the building blocks and reef material we will be able to demonstrate a reduction in the amount and cost of disposal of this material.

### **Comparison Of Tier 1 And Tier 2 And Measures Of Success**

MAYPORT's baseline environmental performance (Appendix II) is already superior in many ways due to implementation of NELP initiatives. Our pollution prevention initiatives some listed previously provide a level of achievement and environmental protection not currently demonstrated at other naval installations. These measures achieve beneficial results in the areas of water and sediment quality in the turning basin, reduction of air emissions and associated permit costs, and reduction in hazardous and non-hazardous waste streams. In publishing our initiatives and the positive results obtained from their implementation, we have built a trust with the community and local stakeholders that is based on our mutual concern and protection of the natural resources we share. In order to nurture that trusting relationship MAYPORT continues to identify stakeholder concerns and take action to demonstrate the value we place on that relationship.

Once the ENVVEST project is approved, bench scale projects are performed and an execution plan developed, MAYPORT in conjunction with the appropriate stakeholders will establish a monitoring program to chart marine development and recreational utilization of the artificial reef habitat. Data on fly ash usage and the resultant decrease in landfill disposal and associated costs will be collected. Dispersion modeling and evaluations will be conducted on the existing ocean disposal site and associated benefits demonstrated from reduction in disposal material will be captured and reported. Viability determination of the offshore reef will be made in partnership with the appropriate agencies including community groups that utilize the area. Data on spills, operations and maintenance activities conducted

in/around the basin, currently collected and reviewed as part of the permit renewal, will continue every three years to ensure pollution prevention initiatives are achieving desired results in water quality improvement and waste stream reduction. Confirmatory sediment sampling will be conducted at regular intervals, as agreed upon by all parties, to confirm pollution prevention results.



## B. COST SAVINGS, PAPERWORK REDUCTION, ECONOMIC BENEFITS

### TABLE 1

#### ENVVEST COST SAVINGS

	(1)	(2)	(3)
FISCAL YEAR	EXISTING COST \$K	ENVVEST PROPOSAL COST \$K	SAVINGS REINVESTED \$K
1999	300	0	300
2001	305	305	0
2004	310	0	310
2007	315	0	315
2008	0	315	---
2010	320	0	320
2013	325	0	325
2015	0	325	---
<b>TOTAL:</b>	<b>\$1,875,000</b>	<b>\$ 945,000</b>	<b>\$1,570,000</b>

**Column 1:** Under current requirements: ocean disposal permit and concurrency renewal is required in 1999, 2001 (maintenance renewal also), 2004, and 2011 (maintenance renewal also) with bioassay sampling performed every three years.

**Column 2:** Under the ENVVEST proposal: a fourteen-year maintenance dredging permit would be issued and bioassay testing would be performed for the ocean disposal permit (if required) at seven-year intervals. A review of spill and maintenance activities within the basin would be performed prior to each dredge cycle.

**Column 3:** The investment savings realized would be reinvested in development and demonstration of beneficial re-use technologies for manufacture of building blocks and artificial reef material.

#### **Other cost savings**

Potential paperwork reduction comes from the use of existing data, and the longer period between permit renewal, i.e. every fourteen years versus every ten years. The frequency requirement for bioassay reports is reduced from every three years to every seven years. Even greater paperwork savings can be realized given the high transferability of this project.

There is a secondary savings, incalculable at this time, that would be realized from the transferability of this project to other ports – Navy and public sector.

The duration of this program is indefinite but contingent upon its continuing efficacy as determined by the proposal's monitoring and auditing provisions. For simplicity, this proposal evaluates implementation over a sixteen-year period.



## C. STAKEHOLDER INVOLVEMENT

Formal contact with stakeholders in regard to MAYPORT's ENVVEST proposal has not been made pending its approval. However, broad support is anticipated given the project's potential to improve environmental performance at MAYPORT and the close ties we have established with our neighbors. "The Navy and the community have a very positive relationship. The Navy is seen as upfront and honest in their dealings with the community and most people interviewed felt that the Navy promotes a good working relationship with the communities by inviting the public on-base for different activities and by attending community functions."<sup>2</sup>

One of the areas of concern identified in community interviews conducted during our Installation Restoration program involved water quality because of the beaches and fishing habitats prevalent in the area. Another community concern is the Northern Right Whale whose calving grounds are located offshore from MAYPORT from May to December. Because the ENVVEST project will have a positive impact on water quality, elimination of the need for offshore disposal, it in turn will also remove the requirement to traverse the Northern Right Whales' migration path.

MAYPORT has had excellent support from the regulatory community and the public. Through the Commanding Officer's environmental quarterly luncheons/meetings with local environmental leaders, Restoration Advisory Board (RAB) meetings and participation on several community forums and boards, we have established a rapport with the community that is founded on trust and open and honest communication. Whereas no formal contact with stakeholders regarding this proposal has been made, upon USEPA approval we will proceed with plans to attract additional stakeholders through established community relations' procedures such as newspaper advertisements, public radio announcements, and fact sheets. Surveys of existing mailing list personnel—which includes local environmental groups, schools, churches, local government—will be conducted to determine their interest in this program. Major signatories and stakeholders currently identified include:

- ⇒ Commanding Officer, MAYPORT
- ⇒ City of Jacksonville Port Authority
- ⇒ City of Jacksonville, Regulatory and Environmental Service Department
- ⇒ Jacksonville Electric Authority (JEA)
- ⇒ USACOE, Jacksonville District
- ⇒ FDEP Northeast District
- ⇒ USEPA Region IV
- ⇒ St. Johns River Water Management District
- ⇒ Beaches Communities
- ⇒ Town of Mayport – Mayport Partnership Council

Once interested participants are identified we will provide the ENVVEST proposal package and hold a kickoff meeting with the participants and signatories within ninety days of project approval. A charter will be developed during the initial meeting and a MAYPORT ENVVEST Implementation Team (EIT) established, which at a minimum will consist of representatives from USEPA, FDEP, USACOE, the City of Jacksonville, RAB and/or other community members and the Navy. The EIT will begin the process of systematic meetings to coordinate dredging issues and develop and

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<sup>2</sup> Excerpt from the *Community Relations Plan for Naval Station Mayport*, dated June 1997.

implement a Plan of Action and Milestones (POAM) to coordinate MAYPORT's next routine dredging cycle for offshore disposal in FY01 and implementation of ENVVEST technologies. The EIT will provide regular status reports during the process and use the previously established community relations framework to disseminate information and status of ENVVEST progress.

#### **D. INNOVATION OR POLLUTION PREVENTION**

The proposed ENVVEST initiatives will serve as demonstrations of both: (1) innovative technologies that are currently in existence but only minimally used, and (2) pollution prevention initiatives to reduce water quality impacts. The proposal to streamline the permitting process will also serve to improve the management process for dredging and disposal actions.

The ENVVEST project will demonstrate beneficial re-use of existing dredge material contained in our holding cells with the end goal of establishing a program to allow dredging into one cell while removing material from the other and thus eliminating the need for ocean disposal. MAYPORT's proposal for this beneficial re-use will set a local precedent by establishing two joint partnerships: one with the City of Jacksonville's electric generating plant, JEA, to use the fly ash generated by that process as stabilization material for the blocks and reef material; and the second with the Mayport Partnership Council by providing them with the environmentally friendly blocks for use in their rehabilitation/tourism projects for the adjacent Town of Mayport.

The pollution prevention portion of our project will be demonstrated through the minimization and/or elimination of ocean disposal requirements. The need for ocean disposal only arose in the last few years when both holding cells reached capacity – an event that took twenty years. By establishing a procedure and a cycle for utilization of one cell for re-use projects and the other cell for dredging events it is anticipated that this will allow an indefinite timeframe during which the cells can be used in perpetuity without reaching capacity.

The existing permit process is a series of confusing and out of sync timelines involving multiple agencies. By developing a template for streamlining this process it will make it easier to understand not only for the permittees but the regulatory agencies and stakeholders as well.

#### **E. TRANSFERABILITY**

Dredge material disposal is a Navywide and nationwide issue and therefore our proposal has a high degree of transferability and further savings beyond just the Navy. The alternatives presented in this proposal are transferable to any location with similar conditions and circumstances. As stated previously, we believe that other Navy ports in the continental U.S. would benefit from this alternative to ocean disposal. While elimination of ocean disposal may not be possible at all locations there is a transferable potential for a decrease in frequency. There are sixteen Navy ports in the continental U.S. and all require some form of maintenance dredging—some on an even more frequent basis than MAYPORT. If the costs of dredging and permits for other Navy ports are evaluated over a similar period, the savings realized just within the Navy would be more than \$25 million.

## **F. FEASIBILITY**

The MAYPORT ENVVEST proposal is both technically and administratively feasible. CINCLANTFLT, MAYPORT's major claimant, and CNO have both endorsed this ENVVEST proposal and strongly believe that it fits squarely into the Navy's program to seek out better ways of managing our processes. The proposed community forum for building the ENVVEST Implementation Team, the RAB, has previously agreed to support environmental initiatives where MAYPORT requires their involvement and communication support. Technical expertise in support of this program will be provided by the USACOE, base personnel and regulatory agencies, as required. The money used for dredging and permit requirements are special project facility funds and are funded through the operation and maintenance program and programmed five years in advance, currently through FY03. The analytical requirements in support of the permit are environmental projects funded through our environmental compliance budget program and are programmed two years in advance, currently through FY02.

## **G. EVALUATION, MONITORING AND ACCOUNTABILITY**

MAYPORT has two objectives in pursuing this project: (1) Reduce the cost of our operation related to dredging material management; and (2) implement procedures to minimize and/or remove potential for harm to the environment. These objectives are not new to us. We continually work to achieve them in other areas of our mission by establishing specific teams to investigate and recommend solutions to operational and environmental issues. We have a proven track record under the NELP of accomplishing many initiatives that are similar to this project and this will be yet another area for demonstration of Navywide benefit where we will serve as a test bed.

Our participation in the ENVVEST program is voluntary in nature and the modification to the existing permit schedule is within the legal purview of the reviewers of this document. The enforceable portion of this project is to be contained in the existing permit structure and also the Final Project Agreement.

Methods for monitoring and reporting on the ENVVEST project will be determined and accomplished by the previously discussed EIT. Potential key components for evaluation of the success of this project, referenced earlier in the SEP section, will be developed by the participants in the EIT and, at a minimum, will focus on benchmarking and tracking the managerial and cost improvements in the permitting process, beneficial re-uses of previously unused "disposal" material, cost avoidance of disposal of dredge material and solidification material (fly ash), recreational improvements and benefits, and transferability of this project to other ports. Reporting on the progress of the project can be documented under the existing NELP communication vehicles including an annual stakeholder's report, fact sheets, periodical articles and on our web site <http://www.mayportnelc.com/>. MAYPORT routinely exports this type of information on lessons learned and successes achieved during technology demonstrations to an established mailing list of over 3,500 people in the DoD, regulatory, and public community. An added benefit of utilizing the web

page is that it can be used as a two-way forum for information sharing during our ENVVEST project in that we can receive suggestions/comments from visitors to the site and incorporate them as necessary.

## H. SHIFTING OF RISK BURDEN

### Environmental Justice

No portion of this ENVVEST proposal has the potential to create “disproportionately high and adverse human health or environmental effects on minority and low-income populations,” and is therefore compliant with Executive Order 12898. During community interviews related to the public’s perception of the environmental program at MAYPORT, we were sensitive to environmental justice concerns and ensured that underrepresented groups were given the opportunity to participate in that process. Because the ENVVEST project will involve water quality concerns, there is tremendous potential for a positive impact on the beaches, river shoreline and fishing habitat surrounding the installation that are enjoyed on a daily basis by all communities within the area.

## *IV REQUESTED FLEXIBILITY*

The intent of MAYPORT’s ENVVEST proposal is to minimize costs associated with dredging the entrance channel and turning basin. This would be accomplished by synchronizing and extending the frequency of permit renewals to the maximum extent allowed by law and reducing the extent and number of associated testing activities. The proposed alternative permitting and testing requirements identified previously will continue to provide a high level of environmental safeguarding. This safeguarding will be further validated by the demonstration of other innovative initiatives MAYPORT is demonstrating under NELP. A few of these initiatives were identified previously in the SEP section. We routinely publish successes achieved and lessons learned under this program and those that serve to demonstrate our superior environmental program will be provided as documentation on our environmental dedication to this project.

## *V COMPLIANCE AND ENFORCEMENT PROFILE*

Numerous permits (Appendix III) and management plans (Appendix IV) will remain operative during ENVVEST implementation and are designed to reduce waste streams and prevent pollution from entering the waters of Florida. The plans are reviewed and updated on an annual basis and changes are made as required. In addition, MAYPORT works proactively to protect the environment by providing oversight of all spill and discharge investigations and by monitoring all cleanups. Routine spill drills and tabletop training are performed in accordance with OPA 90 requirements and have been extremely successful in coordinating all players involved in spill response. We anticipate the completion and implementation of the CBT on the final three classes of ships at MAYPORT in the summer of 1999 and fully expect to validate previous studies on another class of ship which documented zero spills under this traini

MAYPORT has two outstanding compliance issues related to Clean Water Act that were identified by the St. Johns River Water Management District. One violation requires submittal of signed/sealed drawings for the construction of a weir on our manmade lake that is serving to re-establish the lake as a freshwater body to allow use of the water for irrigation of our golf course. Completion and closeout of this violation is anticipated to be July 1999. The other violation requires construction of a water retention pond for a wharf area. The pond was constructed as originally designed but is not draining properly and we expect to institute the recommended modifications to the design and close



out this violation by October 1999. There are no other enforcement actions or outstanding compliance issues associated with operations at MAYPORT.

## ***VI SCHEDULE INFORMATION***

The proposed duration of our ENVVEST proposal is sixteen years with demonstration/implementation of the innovative technology for re-use of dredge material beginning in calendar year 1999. Dredging and ocean disposal is commencing in Spring 1999 and will not be included in this proposal other than to provide baseline documentation. Solicitation of community involvement as identified previously in the Stakeholder section would begin upon approval of the proposal, anticipated to be calendar year 1999. Beginning in calendar year 2001 the permit cycle would be streamlined and synchronized. The modifications to the permit cycles are not anticipated to require any amendments to state and/or federal regulations or legislative involvement that would require anything more than a public review/comment peri

*Appendix I*  
*Location Maps*

*Appendix II*  
*MAYPORT's Environmental Baseline*

*Appendix III*  
*Permit List*

*Appendix IV*  
*List of Management Reports and Plans*