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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING WORK PLAN FOR THE REMEDIAL INVESTIGATION SITE 5 NCBC
GULFPORT MS
5/11/2001
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

11 May 2001

Art Conrad
Naval Facilities Engineering Command
Southern Division
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Re: Work Plan for the Remedial Investigation At the Naval Construction Battalion Center,
Gulfport, MS, March 2001.

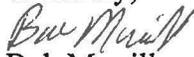
The Mississippi Office of Pollution Control has reviewed the above referenced document and offers the following comments and suggestions.

1. The title should indicate that the Remedial Investigation (RI) will be conducted at Site 5 (Site 5 is not indicated in the title of the document..)
2. The discussion concerning Site Background and History beginning on page 2-1 should include historical groundwater detections in monitor wells at Site 5 to support the text discussion concerning historical occurrences of dioxin in groundwater, especially those exceeding the MCL.
3. Page 4-1, paragraph 3: the text states that a survey will be conducted to identify the extent of dioxin contaminated groundwater in the southwest corner of the site. Although it is clear from the remainder of the document that the investigation will extend throughout Site 5, this portion of the document needs clarification.
4. Pages 5-4 and 5-5: area(s) within Site 5 planned for investigation utilizing Ground Penetrating Radar (GPR) should be shown in map view, or it should be stated in the text that the investigation will extend to the site boundary shown on Figure 2-3.

5. Page 5-6, paragraph 1 and Figure 5-1: locations of the 20 sampling locations planned for the investigation described in Section 5 of the text exclude relatively large areas in northwestern and southeastern areas of Site 5. Additional sampling locations should be planned for these areas for complete coverage, because the results of these direct push samples define areas of concern for groundwater and soil sampling.
6. The extent of dioxin contamination at site 5 has not been fully characterized, therefore limiting "the area of dioxin contamination" for groundwater to that underlying the southwestern portion of Site 5 is premature. The text discussion (page 5-6, paragraph 2) states that "approximately four subsurface soil samples will be collected from within the area of dioxin contamination for analysis of dioxin and VOCs", inferring that the groundwater plume is primarily limited to this area of the site. Later text discussions refer to sampling of areas within and outside of "the area of dioxin contamination". Such references and assumptions regarding the extent of the plume should be removed from the inferred conceptual model until the plume has been fully characterized.
7. Page 5-6, paragraph 2: clarification is needed concerning whether the 6 subsurface soil samples collected from "outside the area of dioxin contamination" will be analyzed for dioxin and furans, and why parameters for the four samples collected from within the "area of dioxin contamination" do not include the full analytical suite as proposed for the other 6 (paragraph 2, sentences 2 and 3). All soil samples selected for laboratory analysis (10 samples from 20 borings are proposed, see comment 5) during the direct push sampling phase should be analyzed for the full analytical suite (including dioxin and furans) shown on Table 5-2 referenced (paragraph 2, last sentence) for samples collected outside the "area of dioxin contamination".
8. Page 5-8, paragraph 3: the number of co-located surface water/sediment samples proposed for analysis should be specified. The text states that "approximately four" will be collected. An additional sampling locality should be considered about 100 feet north (downstream) of those shown on Figure 5-2 in order to capture any groundwater to surface water contribution from northern portions of the landfill resulting from the west-southwest groundwater flow direction illustrated on Figure 2-3.
9. Clarification is needed in the text discussion given on page 5-11 (paragraph 3) concerning the number of borings from which the eleven subsurface soil samples will be collected. The preceding text discussion (paragraph 2) refers to installation of six new monitoring wells with proposed locations shown on Figure 5-3, followed by the statement that the eleven subsurface samples will be collected based on the results of the previous direct push sampling and associated geophysical survey. Clarification is needed in the text discussion as to whether these are the same borings.

10. Page 5-14, paragraph 4: the text describes sampling of six new and five existing monitoring wells, referencing figures 2-3 and 5-3 for the locations. All wells should be shown on one figure for clarity. Comparison of existing well locations shown on Figure 2-3 with proposed locations for new wells shown on Figure 5-3 results in an apparent data gap for downgradient wells along the western site boundary about 100 feet north of the southernmost existing well shown on Figure 2-3. An additional well should be considered for this area since it is hydraulically downgradient of central portions of the landfilled area.
11. Clarification is needed concerning location and status of existing wells. The text (page 5-14, paragraph 4) describes sampling of five existing monitor wells at Site 5, although nine existing wells are shown on Figure 2-3. Clarification is needed concerning which existing wells will be sampled, and why some are apparently being eliminated.
12. Page 8-1: the text states that draft and final versions of the Risk Assessment (RA) reports will be incorporated into the Remedial Investigation (RI). The plan describes sampling of the stream that parallels the western boundary of Site 5 about 100 feet to the west. Clarification is needed concerning whether the data collected during sediment and surface water sampling planned for the RI at Site 5 will be the utilized in the base wide ecological risk assessment or if a separate (site specific) evaluation is planned.

Please feel free to contact me if I can be of further assistance.

Sincerely,

Bob Merrill

cc. Elizabeth Wilde, USEPA