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NCBC GULFPORT  
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LETTER AND COMMENTS FROM U S EPA REGARDING DRAFT FINAL SITE CLOSURE  
REPORT SITE 8 AREAS B AND C NCBC GULFPORT MS  
8/4/2003  
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

August 4, 2003

Art Conrad  
Remedial Project Manager  
Southern Division, Naval Facilities Engineering Command  
2155 Eagle Drive, Post Office Box 190010  
Charleston, South Carolina 29419-9010

SUBJ: EPA Comments on the Draft Final Site Closure Report  
Site 8 Areas, B and C  
Naval Construction Battalion Center  
Gulfport, Mississippi

Dear Mr Conrad:

Please find enclosed EPA's comments on the above referenced document. EPA is providing these comments to the Navy as part of the consultation provisions of CERCLA. If you have any questions about these comments or any other issue, please feel free to call me at (404)562-8506.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert H. Pope".

Robert H. Pope  
Federal Facilities Branch  
Waste Management Division

cc: Bob Merrill, MDEQ

**EPA's Comments on the Draft Final Site Closure Report  
Site 8 Areas, B and C  
Naval Construction Battalion Center  
Gulfport, Mississippi**

**GENERAL COMMENTS**

None.

**SPECIFIC COMMENTS**

1. **Section 2.0, page 2-2.** Please explain the specific information from the various Site 8 investigations and the provisions of the NCP that led the Navy and Air Force to the decision that a time-critical removal action was appropriate for Areas B and C at Site 8.
2. **Section 2.0, page 2-2.** The text of the final paragraph in this section is somewhat confusing. Please provide a further description of the installation of the sediment traps in the ditches that convey surface water from Site 8. For example, were there any reports generated describing the sediment traps and their subsequent installation? Also, explain whether the installation of these sediment traps was undertaken under the Time Critical Removal Action.
1. **Section 3.0, page 3-2.** Please provide a definition for the description of "hot spot" discussed in the third paragraph on this page.
2. **Section 5.0, page 5-2.** The first full sentence on this page indicates that results reported by the laboratory as non-detects were assigned a value of zero for the purpose of calculating the TEQs. TEQs were then used to calculate 95% UCLs. According to EPA guidance (EPA, 2002), assigning a value of zero to non-detects for use in the calculation of the 95% UCL is inappropriate unless specific justification is provided. Typically, non-detects are assigned a value of ½ the detection limit. Please provide specific rationale for assigning a value of zero to non-detects or assign a value of ½ the detection limit and recalculate TEQs and UCLs as necessary.

EPA, 2002 "Calculating Upper Confidence Limits for Exposure Point Concentrations at  
Hazardous Waste Sites", OSWER 9285.6-10, December 2002.