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NCBC GULFPORT
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LETTER REGARDING SECOND DRAFT PUBLIC HEALTH ASSESSMENT NCBC GULFPORT
MS
9/10/2004
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

10 September 2004

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

Re: Public Health Assessment for U.S. Naval Construction Battalion Center Gulfport, Mississippi, Agency for Toxic Substances and Disease Registry, Second Draft, July 21, 2004.

This document appears to adequately address primary health concerns and to describe the position and findings of ATSDR concerning dioxin contamination associated with NCBC Gulfport. The primary discrepancy appears to be in the description of health based screening levels, action levels utilized by EPA and ATSDR and the cleanup standards presently being utilized by the base.

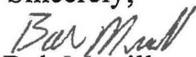
1. The text description given on page 18 (last sentence) and page 19 (first paragraph) concerning health based screening and action levels is very nebulous. The text states that ATSDR utilizes a human health based soil screening level of 50 ppt and a cleanup/action level of 1 ppb. The text (page 19, paragraph 1) subsequently disregards the 50 ppt screening level and describes the 1 ppb concentration as a trigger for a need for public health actions, implying that 1 ppb is a human health based screening/cleanup value.

The screening/cleanup level of 1 ppb is utilized by EPA but not endorsed as a human health based value, so clarification is needed as to the use of this value by ATSDR as a human health action level. The text should be reworded and clarified to accurately describe the difference between action levels, screening levels and human health based cleanup levels. The incorrect implication that 1 ppb is a human health based action level is repeated throughout the text.

2. The document fails to acknowledge that the state of Mississippi utilizes a health based residential screening and cleanup concentration of 4.26 ppt and 38.0 ppt for industrial applications for soils and sediments. The text also fails to report that NCBC Gulfport is in the process of cleaning up to these values.

These concerns were noted in comment letters submitted by DOD for the first draft of this document, although the wording was not significantly changed for this draft.

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

Sincerely,

Bob Merrill

cc. Michelle Thornton, USEPA