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NCBC GULFPORT
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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING VERIFICATION SAMPLING AND ANALYSIS PLAN SITE 8 STORAGE
AREA AND OFF BASE NCBC GULFPORT MS
12/28/2004
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

28 December 2004

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

Re: Verification Sampling and Analysis Plan for Site 8 Herbicide Orange Storage Area and Off Base Area of Contamination, Naval Construction Battalion Center Gulfport, Mississippi, December 2004.

The Mississippi Office of Pollution Control (OPC) has reviewed the above referenced document. The draft version of this document was submitted in June 2003 when the facility was actively pursuing remediation and closure of the off base Area Of Concern (AOC) under the Brownfields Program (beginning 17 January 2003). The Navy subsequently reverted to CERCLA to proceed with active remediation as an interim action for this AOC beginning November 2004. This document was then utilized to fulfill requirements for a work plan for verification sampling of contaminated media in the off base AOC (previously referred to as the Brownfields AOC) under the CERCLA Program. Numerous comments submitted by regulatory agencies and Stakeholders as well as discussions held during meetings regarding the draft (June 2003) version of this document have resulted in numerous changes to the original version. OPC concurs with concerns submitted by all reviewers and offers the following additional comments.

1. The Navy has expressed (see attached correspondence dated 15 November 2004) a desire to eventually close certain off base properties under the Brownfields Program after cleanup under CERCLA only to "restricted values that would still require some remedial efforts". It is acknowledged that present remedial efforts are not being conducted under the Brownfields program. The above referenced correspondence (sentence 5 and last sentence) indicates a desire to revisit appropriate documentation (understood to be submittal of documents in appropriate format and content) and requirements of Brownfields in order to pursue closure under that program. Please note that this Work Plan does not satisfy guidance for a Brownfields Verification Sampling and Analysis Plan (VSAP), but is sufficient for CERCLA verification sampling for an interim source removal.

2. Sections 3.2.3 and 3.2.4 briefly describe in general a groundwater monitoring plan consisting of a one time sampling of 4 wells unless concentrations above regulatory values are detected. A separate detailed Long Term Monitoring Plan that will demonstrate the long term effectiveness of the planned remedial action should be submitted. A sediment monitoring plan should also be developed in order to demonstrate the absence of contaminated media migration after source removal has occurred.

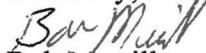
Please note that whether closure under Brownfields or CERCLA is desired, long term groundwater monitoring plan requirements and associated documents (plans, reports, sampling frequency, well distribution, etc.) should be completed in accordance with the appropriate guidance(s). OPC looks forward to receipt of the Long Term Monitoring Plan.

3. A maximum allowable hot spot concentration of 100 ppt is proposed on page 3-3 (paragraph 1). This value may require reconsideration pending the outcome of the Ecological Risk Assessment that is presently underway. Discussions during meetings and teleconferences concerning ecological risk values have indicated potential values well below 100 ppt for the most sensitive vertebrate (mink). The maximum allowable concentration of dioxin in any media of concern should reflect the lesser of the most conservative ecological RGO or a value determined to be protective of human health and the environment.

It is noted that further discussion of this will follow submittal (technical memorandum) of a brief overview of the development of preliminary ecological RGOs for the off base Area of Concern for review by Stakeholders and regulatory agencies involved with this facility.

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

Sincerely,


Bob Merrill

cc. Michelle Thornton, USEPA