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NCBC GULFPORT
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U S NAVY COMMENTS TO MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
COMMENTS TO REMEDIAL INVESTIGATION WORK PLAN SITE 3 NCBC GULFPORT MS

1/1/2007
U S NAVY

**Response to MDEQ Comments
Draft Site 3 Remedial Investigation Work Plan
NCBC Gulfport, Gulfport Mississippi**

General Comments During the time the *Draft Work Plan for Remedial Investigation at Site 3* was under preparation and following its submission to the State for review, Tetra Tech NUS (TtNUS) was completing initial investigation and delineation activities under the *Additional Investigation at Site 3-Northwest Landfill/Burning Pit* (SOW#1261, Rev.1, dated August 29, 2006). The consideration of on-base housing near Site 3 in the northwestern corner of the base was the primary driver for this initial investigation.

Data collected during the initial investigation was incorporated into the *Final RI Work Plan* which, in turn, allowed TtNUS to better locate media sampling locations to comprehensively identify and delineate COPCs, determine the best placement for permanent groundwater monitoring wells, and, ultimately, refine the Remedial Action Objectives and the Site Conceptual Model.

Specific Comments	Response
<p>Clarification is needed concerning surface and subsurface soil sampling strategies. The text (page 3-6, paragraph 1) describing the conceptual model for Site 3 indicates that subsurface soil (not surface soil) is the primary affected media. The text (page 5-2, last paragraph) states that surface soil (not subsurface soil) will be sampled at selected locations but neither surface or subsurface soil sampling is addressed in the sampling details given on pages 5-3 through 5-5.</p>	<p>Text has been modified to clarify soil sampling strategies.</p> <p>As discussed in the general comments, an initial phase of investigation has been completed to allow for a better understanding of site conditions.</p>
<p>Clarification is needed concerning the apparent reduction of allowable regulatory document review time. The section entitled Work Schedule (Section 10, pages not numbered) allows 21 working days for review of the draft final (present?) Work Plan. An initial drafty Work Plan has not been received. No time is allotted for review of a draft or final Work Plan. The standard document review time has historically been 45 days (barring unforeseen circumstances).</p>	<p>Beginning in calendar year 2007, schedules will provide 30 working days for small workplans and 45 working days for large workplans and reports.</p>
<p>A Health and Safety Plan should be provided (for review) with this Work Plan.</p>	<p>The POA for Site 3 (SOW #1261 dated May 1, 2007) states in <i>WBS Task 04 subsection 3.5.2 Work Plan</i> that only the <i>Final Work Plan</i> will contain the Health and Safety Plan (HASP) as an appendix.</p> <p>The HASP will be submitted with the <i>Final Work Plan</i>.</p>