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WORK PLAN ADDENDUM FOR USDA ANIMAL AND PLANT HEALTH INSPECTION
SERVICE NCBC GULFPORT MS
10/26/2007
TETRA TECH NUS

TtNUS/TAL-07-127/0293-4.1

October 26, 2007

Commander, Southern Division
Naval Facilities Engineering Command
Attn: Harold McGill (Code ES32)
Remedial Project Manager
2155 Eagle Drive
North Charleston, SC 29419-9010

Reference: CLEAN Contract No. N62467-04-D-0055
Contract Task Order No. 0012

Subject: Work Plan Addendum Letter
USDA APHIS Expanded Site Investigation

Dear Mr. McGill,

Introduction

Tetra Tech NUS (TtNUS), under contract to the U. S. Department of the Navy, Southern Division, Naval Facilities Command (NAVFAC EFD SOUTH), has prepared this Work Plan Addendum for the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) in Gulfport, Mississippi. This work plan was prepared under the comprehensive Long-term Environmental Action Navy (CLEAN) IV, Contract No. N62467-04-D-0055. This work plan is an update to the USDA APHIS PA/SI Work Plan (TtNUS, February 2004).

The objective of this Work Plan Addendum is to complete the characterization of dichloro-diphenyl-trichloroethane (DDT) and dieldrin detected in the subsurface soil on the western side of the facility (TtNUS, January 2007). This document describes the field activities, laboratory analyses, and data management that will be performed to complete the study.

Site Background and History

The USDA APHIS facility, located in Gulfport, Mississippi is a 4.6 acre facility dedicated to protecting animal and plant resources from exotic, invasive pests and diseases, and it also monitors and manages agricultural pests and diseases already existing in the United States. In this capacity, the facility maintains a full service on-site analytical laboratory. A detailed description of the site background is included in the PA Report (TtNUS, 2003).

Operations at the facility include analytical chemistry; organic synthesis research for control of fire ants; and other soil-inhabiting insects, and trace residue analysis. A wide variety of pesticides, solvents, and other chemicals have been used and stored at the facility since it began operation. While the current practice of storing chemicals is primarily done in clean and well-organized buildings, waste handling operations prior to 1980 are unknown or not well documented. Available information about past material handling and waste disposal practices indicated the possibility of underground waste disposal and surface disposal of chemicals.

Evaluation of data collected during the 2006 ESI identified the presence of DDT and dieldrin in the subsurface soil. These levels exceeded Mississippi Department of Environmental Quality (MDEQ) Tier I Unrestricted Target Remediation Goal (TRG) screening levels. One subsurface soil sample collected at 32-36 feet bls (ESI-04), reported a DDT concentration of 8.4 mg/kg (uTRG of 1.88 mg/kg) and a dieldrin concentration of 0.68 mg/kg (uTRG of .0399 mg/kg). TtNUS recommended further evaluation of the surface soil immediately above ESI-04 to determine the extent of contamination.

Field Activities

Field activities conducted during this event will include soil sampling only. Field activities will be conducted in accordance with the site specific Health and Safety Plan (HASP) and the ESI Work Plan (TtNUS, 2006). Detailed descriptions of field procedures are located in the ESI Work Plan (TtNUS, 2006).

Twelve soil samples will be collected via hand auger. Two soil samples will be collected from five discrete locations; one sample at 0-0.5 feet bls and a second sample at 2.5-3 feet bls. One sample will be collected in triplicate per the USDA's request. Figure 1 illustrates the

proposed locations of the soil samples. No investigation derived waste (IDW) will be generated during field activities. Sample locations will be marked via global positioning system (GPS) but will not be surveyed by a State licensed surveyor.

Laboratory Analysis

Samples will be sent to an off-site laboratory for SW-846 8081A analysis only. One duplicate sample will be collected during field activities for laboratory Quality Assurance (QA).

Data Management

The FOL and/or sample coordinator will be responsible for entering the data into the database in the field. The following data will be entered into the project database:

- Sample information (i.e. identification, matrix, sample depth, collection time, analyses)
- Location information
- Chain of custody information
- Shipping data
- Field descriptions
- Photographic logs

If you have any questions regarding the information presented in this document, please contact me by phone at (850) 385-9899 or via e-mail at robert.fisher@ttnus.com

Sincerely,



Robert Fisher, P.G.
Task Order Manager
Date: October 26, 2007

Enclosures

c: USDA (2 copies)
 Phillip Weathersby
 Debbie Humbert (1 copy)
 Mark Perry (1 copy)

Mr. Harold McGill
Naval Facilities Engineering Command
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