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LETTER FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY REGARDING PHASE 2 OFF BASE GROUNDWATER REPORT FOR OFF BASE AREAS OF CONCERN
NCBC GULFPORT MS
6/19/2009
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

19 June 2009

Robert Fisher
NAVFAC SE (OPG6)
PO Box 30, Bldg 903
NAS Jacksonville, FL 32212-0030

Re: Phase II Off Base Groundwater Investigation Report for the Off Base Area of Concern (Arndt - Bennett Properties), Naval Construction Battalion Center Gulfport, Mississippi, Draft, June 2009.

The Mississippi Office of Pollution Control (OPC) has reviewed the above referenced document. The following concerns were noted during document review.

1. It is noted that dioxin concentrations detected in the new (permanent) groundwater monitoring wells were lower than those reported from the Phase I (March 2008) Direct Push sampling event. OPC concurs that elevated TCDD dioxin concentrations detected during the Phase I event can probably be attributed to soil particulates introduced into the groundwater sample during the DPT sampling process. It is also noted that three dioxin congeners (other than TCDD) were reported at concentrations above regulatory levels.

2. Four metals (lead, beryllium, aluminum and iron) were detected above regulatory screening levels. The text (page 5, paragraph 2) states that "these concentrations probably represent naturally occurring levels of these metals". Coastal Plain strata of Mississippi do not contain geologic units that contain deposits of lead or beryllium that would support dissolved phase groundwater concentrations that exceed MCLs. Although these occurrences may be attributable to other sources of contamination, these concentrations do not reflect "natural" or in situ mineral assemblage (parent material) dissolution. If another source of contamination is proposed then that source should be identified. Aluminum and iron do not have primary MCLs but secondary screening levels were exceeded for those metals also, potentially exceeding ecological screening levels.

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

Sincerely,

Bob Merrill

cc. Bart Reedy, USEPA