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NCBC GULFPORT
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMEDIAL
INVESTIGATION REPORT FOR SITE 1 NCBC GULFPORT MS
12/20/2010
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

20 December 2010

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

Re: Remedial Investigation Report for Site 1- Disaster Recovery Area, Naval Construction Battalion Center Gulfport, Mississippi, Draft, January 2010.

The Mississippi Office of Pollution Control (OPC) has reviewed the above referenced document (received by OPC on 22 April 2010) and comments (included with the document) submitted by the Navy. OPC concurs with all comments submitted by the Navy. The following additional concerns were noted during document review.

1. Comments submitted by the Navy (and OPC) will require expansion of existing (and addition of new) text discussions that will significantly change the disposition and scope of the report, which will necessitate development of an additional draft (draft final) version of the report for review prior to submittal of the final version. The review process would be expedited if future documents submitted to OPC were updated to include comments generated by the in-house review (by the Navy) process when comments are of a nature that will significantly change the presentation and scope of the document. The cover letter forwarded with this document indicates that the intent was to submit this document without such corrections in place. This extends document review time and creates costly redundancies in the review process. A response to comments should be submitted prior to the draft final version of this document to minimize such redundancies.
2. Many of the figures typically utilized for this type of reporting that contain cartography with superimposed labeling and other pertinent information have been shrunk down from the typical format that has been historically utilized (by the Navy) for these types of figures and plates to a much smaller 8.5" X 11" text page size and the small superimposed labeling and other lettering is difficult (if not impossible) to read.

The figures should be enlarged to the standard format(s) historically utilized (in typical remedial reports submitted by DOD) for presentation of plates that contain this type of cartographic, site- and sample-specific information. This includes (but is not necessarily limited to) Figures 1-3, 1-4, 2-1 through 2-7, 3-1 through 3-5 and 4-1 through 4-5.

3. The text (page 2-3, paragraph 2) references Appendix C for soil boring logs. Soil boring logs appear in Appendix D of the enclosed CD. Logs of monitor well and subsurface sample borings as well as monitor well construction logs should be included in the main body of the report in order to facilitate referencing.
4. Hydrogeologic cross sections should be included in groundwater investigation reports that show the names of aquifers and geologic units as well as lithologies encountered in borings and screened intervals of monitor wells in order to facilitate development and understanding of conceptual site model(s). The generalized lithologic section shown in Figure 3-3 (labeled "Geologic Cross Section") only provides condensed lithologic descriptions (ex. gravel, sand, silt, etc.) along a section line that intersects four (of the many available) borings, but does not identify aquifer names (which frequently bear the formation names comprising them) or screened intervals of nearby (to the line of section) monitor wells.

The identifications and descriptions of hydrogeologic units, including their vertical boundaries (formational boundaries and facies changes within the associated aquifers) and details of their respective lithologic variations should be addressed in the text and supported by visual presentation on hydrogeologic cross sections. Groundwater monitoring wells should be superimposed on the hydrogeologic cross section(s) to indicate the unit(s) within which they are screened to support text discussions. For example, lower permeability layers discussed (in the Conclusions Section) on page 8-3 (paragraph 3) that serve to restrict downward contaminant migration should be identified in text discussions (concerning hydrogeology) and identified on cross sections included in the report.

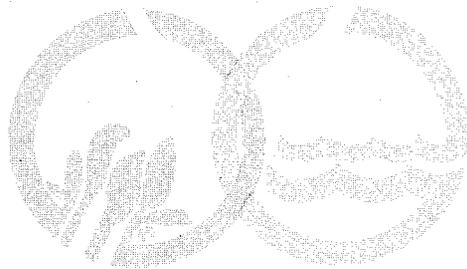
5. A separate text discussion of land use focusing on the restriction of groundwater for drinking or agricultural purposes should be included in the report.
6. It is noted that planned remedial activities include construction of a low permeability soil cover due to inadequate hydraulic properties of the current soil cover and that long term groundwater monitoring and maintenance of the soil cover will be required (page 8-7, last paragraph). OPC concurs with these recommendations.

7. The date on this (and future) document(s) should generally reflect the date submitted. For example, this document is dated January 2010 but was not received (by OPC) until 22 April 2010.

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

Regards,

Bob Merrill
Bob Merrill



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ENVIRONMENTAL QUALITY