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NCBC GULFPORT
5090.3a

LETTER AND COMMENTS FROM U S AIR FORCE REGARDING REVIEW OF SOIL
SAMPLING AND ANALYSIS, GROUNDWATER MONITORING, AND HEALTH AND SAFETY
PLANS NCBC GULFPORT MS
5/8/1991
U S AIR FORCE



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC
20330-5000

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F11 08 MAY 1991

5090/5A

Ms Josephina Castellanos
Versar, Inc
6850 Versar Center
P.O.B. 1549
Springfield, VA 22151

Subject: Review of Soil Sampling and Analysis Plan (SSAP),
Groundwater Monitoring Program Plan, Health and Safety Plan, and
Soil Sampling and Groundwater Sampling Analytical Program for the
Naval Construction Battalion Center (NCBC), Gulfport, MS.

1. Our office (Mr. Kneeling and Mr. Short), the Navy (SouthDiv
NAVFACENGCOM and NCBC) and EG&G Idaho have reviewed the subject
plans. The following general concerns and comments are provided
for incorporation into the final documents:

a. The soil at NCBC was extensively characterized according
to the vertical and horizontal distribution of the contaminant
tetrachlorodibenzo-p-dioxin (TCDD). However, only sketchy data
exist for other contaminants in herbicide Orange such as 2,4-D or
2,4,5-T or their possible breakdown products. The dimensions of
the grids used for the early work at NCBC reflect one approach to
delineate the distribution of TCDD and also presupposed the need
to excavate individual plots. Subsequent sampling plans need not
use the 20 x 20 foot plot dimensions unless there is an underlying
need to relate back to the original site grid to verify removal of
contaminants (from the previous excavation effort) without
requiring extensive resampling. Also, the original grid marks at
NCBC were lost during the excavation for the incinerator
demonstration; new grids must be set up anyway.

(1) The SSAP plots should be revised according to Atch
1, paragraph 1. Sufficient soil should be collected for the grab
samples to allow for split samples to be maintained for future
reference. Notations should be made as to the excavation status
of the plot including the percent excavated and depth of
excavation. Any backfill must be excluded from the samples.

(2) Samples from Area A will be collected randomly
depending on availability of unencumbered (no stored ash/no
backfill) plots. Most unexcavated plots were covered with ash
pending delisting actions. The same sampling technique will apply
as for Areas B and C; i.e., four grab samples per 50 x 50 foot
grid.

(3) Atch 1, paragraphs 5-8 should be addressed.

b. The final document will be sent to Navy, EPA IV and the
State of Mississippi for their review.

2. In addition, we request support from VERSAR in carrying out a technical assessment of all information submitted to EPA pertaining to the delisting of the soil incinerated at NCBC regarding its completeness. This includes the (1) delisting petition, (2) the addendum, (3) questions posed in a draft HQ EPA response letter, (4) EPA IV questions raised concerning a draft decision document for site closure, and (5) contractor response to item (4). This review is critical to our evaluation to determine the alternatives concerning delisting.

3. Please contact Mr Jeff Short, (202) 767-0276, to discuss your capabilities to support the technical assessment of the delisting documentation. Our target dates for both the revised sampling and analysis plan and the technical assessment are 3 Jun 91.

Curtis M. Bowling

CURTIS M. BOWLING, GM-15
Deputy Director of Env. Quality
Office of The Civil Engineer

1 Atch

Navy Contractor Comments

cc: Mr. Jim Cook, EG&G
NAVFACENCOM, SouthDiv
Commander, NCBC



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

2155 EAGLE DR., P. O. BOX 10068

CHARLESTON, S. C. 29411-0068

PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER.

REFER TO:

5090

Code 18215

03 MAY 1991

Mr. J. J. Short
HQ AF/LEEVO
Bolling Air Force Base
Washington, DC 20332-5000

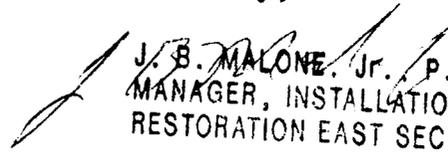
Subj: REVIEW COMMENTS FOR SAMPLING AND ANALYSIS PLAN AT CBC GULFPORT,
GULFPORT, MS.

Dear Mr. Short:

Subject comments are forwarded for your consideration.

If you have any questions, please contact Mr. Jim Reed, Code 18215, at A/V
563-0572 or Mr. Dan Owens, code 181210, at A/V 563-0331.

Sincerely,


J. B. MALONE, Jr., P.E.
MANAGER, INSTALLATION
RESTORATION EAST SECTION

Encl:

(1) Copy of Comments by ABB on Versar Work Plan



7503-13

DATE: March 8, 1991

Commanding Officer
ATTN: Mr. Jim Reed, Code 18215
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston, SC 29411-0068

SUBJECT: Review of Soil Sampling and Analysis Plan, Ground-Water
Monitoring Program Plan, and Health and Safety Plan,
Naval Construction Battalion Center (NCBC), Gulfport, MS

Dear Jim:

ABB Environmental Services (ABB-ES) has reviewed the above referenced documents prepared by VERSAR, Inc.. The following comments are a results of this review.

SAMPLING PLANS

1. Page 10, paragraph 2, twenty five (25) 20'X20' grids will comprise a plot (100'X100') at each of the Hazardous Storage Areas (HSAs). The Sampling and Analysis Plan (SAP) indicates that samples from each grid will be composited to form a composite plot sample. The SAP does not state the locations and depth of the grab sample from each grid in a sampling plot. It is assumed that one sample will be collected from each grid. It is recommended that atleast 4 grab samples should be collected to form a composite sample for each grid. As this procedure involves an extremely large number of samples, it is recommended that the grid size be increased to 50'X50'. The plot size may still be maintained at 100'X100'. This procedure will result in a more representative sample from each plot, and thus help in characterizing the contamination area more clearly. These changes will also result in the modification of Figures 1, 2, and 3.
2. Page 11, section 2.0, It is unclear if action levels established in the SAP have considered the dilution of the grid samples. It is recommended that action levels should be based on the number of grab samples comprising a composite sample.
3. Page 19, section 4.2, The SAP states that samples from HSA-A will be collected in a random manner. But it is unclear if any bias will be provided for visibly contaminated areas, or if certain locations will be targeted more than the others, etc. No specifics have been included in the SAP.
4. Page 26, Equipment blank samples should be collected from compositing bowls and not from the disposable scoops.

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GENERAL

- 5. The plans do not discuss the zoning (exclusion, decontamination and clean) areas and their locations.
- 6. Confidence levels for statistical analysis are not provided in the SAP. These levels should be decided before the field program begins to eliminated any bias.
- 7. The level of protection for the monitoring well installation and soil and groundwater sampling should be stated in the SAP.
- 8. Specific models for modeling the aquifer characteristics have not been identified.

If you have any questions, please call me at 904-656-1293.

Very truly yours,

ABB ENVIRONMENTAL SERVICES INC.

Rao V.R. Angara
Rao V.R. Angara
Task Order Manager