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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY REGARDING REVIEW OF WORK PLAN FOR DRUM REMOVAL SITES 1, 4 AND 5
NCBC GULFPORT MS
7/2/1996
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

2 July 1996

Art Conrad
Naval Facilities Engineering Command
Southern Division
2155 Eagle Drive
P.O. Box 190010
North Charleston, S.C.
29419-9010

RE: Work Plan for Drum Removal at sites 1, 4 and 5, Naval C.B.C., Gulfport.

The CERCLA Section of the Mississippi Office of Pollution Control has reviewed the above referenced document and offers the attached comments. We will be available to assist in any questions you may have regarding remedial and sampling activities at the base. Please feel free to contact Phillip Weathersby or myself at 601-961-5171.

Sincerely,

Bob Merrill

Attachment
cc: James Barksdale, USEPA
Gordon Crane

COMMENTS

1) Ground water depths given on Table 1 of the Work Plan were measured from the top of the riser pipe. Corrected depths are given in the following table. Page 2 of Section 1.2 states that sandy material extends to a depth of about 20 feet and is underlain by a clay layer, and target zones extend from 1 to 15 feet (Section 1.3, pg.2). Page 12 of Section 4.0 and page 4 of Section 02210 (Appendix F) state that no excavations will extend below the water table. Water table elevations in this perched aquifer will probably be lower (during summer periods of less rainfall) than those measured in March of 1987 during field work for the Verification Report (Harding-Lawson Associates, 11 November 1987). The following table gives water table depths at planned excavation sites (1,4 and 5) as reported in that study.

SITE	MONITOR WELL #	DEPTH TO GROUNDWATER (FEET) FROM TOP OF CASING	HEIGHT OF RISER PIPE	DEPTH TO GROUNDWATER (FEET)
1-Disaster Recovery Landfill	Gpt 1-1	4.5	2.5	2.0
1-Disaster Recovery Landfill	Gpt 1-2	5.0	2.6	2.4
1-Disaster Recovery Landfill	Gpt 1-3	3.6	2.3	1.3
4-Golf Course Landfill	Gpt 4-1	2.6	2.5	0.1
4-Golf Course Landfill	Gpt 4-2	4.9	2.5	2.4
4-Golf Course Landfill	Gpt 4-3	10.0	2.6	7.4
5-Heavy Equipment Training Landfill	Gpt 5-1	7.3	2.5	4.8
5-Heavy Equipment Training Landfill	Gpt 5-2	5.4	2.5	2.9
5-Heavy Equipment Training Landfill	Gpt 5-3	8.9	2.5	6.4

Limiting excavation depths to those above the water table would limit the scope of study to between 0 (near GPT 4-1) to 7.4 feet of depth (near GPT 4-3) or less than half of the anticipated target depth of 15 feet if the aquifer has received significant recharge. If not, lowermost target intervals would still be eliminated. Therefore, exploratory excavations should continue below the water table in areas where buried drummed waste is suspected.

2) The lateral extent of the scope of study is limited to individual small areas within high anomaly zones shown as Area A on figures 9-11 on pages 33-35. Many areas of high anomalies are omitted (A3 at Site 1, A2 at Site 4, A2-A4 and A6-A11 at site 5), as well as all areas exhibiting secondary or lower anomalies (shown as Area B on figures 9-11). The basis for omitting these areas of high anamoly is not understood.

Material encountered within small areas of high anomaly zones (Zone A) may not be representative of the entire A zone. Drums may also be buried in secondary anomaly areas (Zone B, shown on figures 9-11), although the work plan does not address exploratory excavation in secondary anomaly zones. Linear trenches extending across primary and secondary (A and B) anomaly zones at each site could provide more representative sampling\observation of buried waste.

The text (pages 12 and 14 of Section 4 and page 2, Section 02210 of Appendix F) states that the extent of planned excavation (shown on figures 9 through 11) will be modified depending on the quantity of buried drums encountered in primary anomaly areas. Planned excavation areas within high anomaly (A) zones should not be abandoned (as discussed on page 2 of Appendix F) because buried drums are not encountered at a particular location within the A zone. If an excavation reveals objects other than hazardous waste drums that cause high anamolies, the objects should be removed and the absence of the anomaly should be confirmed using appropriate geophysical methods.

3) Although not pointed out in the text, disposal analyses for pesticides (soil and drum contents) are planned only for site 5 (Table C-3 on page 40 of Appendix C). Pesticide analyses should be conducted for these mediums at each of the sites due to unknown waste streams and the lack of accurate records of disposal activities conducted during times of operation (between 1942 and 1976) at these landfills.

4) Page 41 of Section C; Site 2 should read Site 5 for decontamination water. If comment 3 is employed then Site 2 should read sites 1, 4 and 5.

5) No soil analyses for dioxin are planned. Interviews with base personnel indicated that damaged drums containing Herbicide Orange were removed from the Site 8 storage area and placed into landfills 4 and 5 (Onsite Delineation Workplan, Site 8, April 1986, page 2-1). Dioxin analyses should be conducted for soil samples excavated in association with hazardous waste drums. Otherwise, dioxin contaminated soil could be transported off base and accidentally disposed of at an unauthorized disposal facility.

6) The Waste Management Plan (Appendix D) does not adequately address management and disposal of non-hazardous waste. The work plan addresses handling and disposal of non-hazardous inert waste in the forms of soil, debris and decontaminated drums in a general way on pages 14 and 16 of Section 4. All types of excavated non-hazardous waste (including typical household garbage) should be handled and disposed of according to state and federal

regulations. No waste should be returned to these non-permitted landfills.

7) The Waste Management Plan (Section 3.2 of Appendix D, page D-3) states that soils will be either used as backfill or disposed of based on visual contamination (visually contaminated soil will be disposed of at an approved facility and remaining soil will be used as backfill material). The disposal criteria given on page 14 of section 4 and pages 12 and 48 of Appendix C indicate that this decision will be based on sample analyses (Target Compound List) at an off-site laboratory. This paragraph needs to be reworded to read in accordance with pre-disposal soil analyses as described on page 14 of Section 4 and pages 12 and 48 of Appendix C.