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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL  
QUALITY REGARDING FINAL GROUNDWATER MONITORING WORK PLAN NCBC  
GULFPORT MS  
8/11/1997  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



**STATE OF MISSISSIPPI**

DEPARTMENT OF ENVIRONMENTAL QUALITY

**JAMES I. PALMER, JR.**  
EXECUTIVE DIRECTOR

**11 August 1997**

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

RE: Groundwater Monitoring Workplan, Final, June 1997

The Mississippi Office of Pollution Control has reviewed the above referenced document and offers the following comments and concerns.

Comments 1, 2 and 4 of the concerns communicated in the 19 March comment letter have not been properly addressed, and remain applicable to the project. Inconsistencies remain in the text of the final (June 1997) version that occurred in the final draft (December 1996) version. The following comments are submitted as examples:

1) The paragraph occupying the bottom of page 1-1 and the top of page 1-2 states that Cone Penetrometer (CPT) testing will be performed at sites 1, 2, 3 and 7 because there is no evidence to suggest that a CPT study is warranted.

2) The total analyte list is not provided in subsection 3.3.3 as stated in the last sentence of Section 3.2.2.1. Please provide a table showing analyses that will be performed on samples at each of the various sites. All groundwater analyses should be conducted as described in paragraph 2 of Section 4.1.1 and include analytes and compounds given in the RCRA Appendix IX list in addition to dioxins and furans.

3) The text of Section 2.2 (page 2-5) states that the intention is to stay narrowly focused on Herbicide Orange (HO) and HO related dioxin while considering other chemicals only as they might impact fate, transport and extent of HO contamination. This contradicts the text discussion of

groundwater analyses given on paragraph 3 of page 2-7, and soil and groundwater analyses given in Paragraph 2 of Section 4.1.1 page 4-1.

- 4) The statement in Section 1.4 of page 1-7 describing dioxin detected in sediment samples during the 1995 investigation fails to include occurrences along the southern perimeter of the base.
- 5) The last paragraph of Section 2-2 states the importance of understanding all surface water migration pathways in order to properly design future engineering controls that will isolate groundwater contamination from surface water contamination. OPC does concur with the need to understand migration pathways in detail as stated in several previous comment letters and voiced at several meetings, although surface water pathways in southern and southwestern areas of the base are not shown in any of the figures included in this or previous reports. Reported surface water pathways and areas of contamination have focused on northern areas of the base and northward flowing drainages occupying northern and western portions of the base. The association between Site 8 and the central area of the base between Site 8 and the elevated concentrations reported along the southern base boundary and eastward toward and including Outfall 2 have not been described in reports received by OPC. Surface water drainage in the central area of the base between Site 8 and the southern perimeter of the base as well as drainage along and south of the southern base boundary remain to be accurately described in report form.

An opportunity for review of Phase 1 sampling results at all sites (sites 1 through 8) should precede Phase II activities. OPC would like to participate in final decisions concerning location and number of wells at each site included in both phases of the investigative/well installation process.

Please respond to these comments in writing within 30 days and feel free to contact me at 601 961 5049 if you have any questions or comments.

Sincerely,  
  
Bob Merrill

cc: James Barksdale, USEPA