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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL  
QUALITY REGARDING SURFACE WATER AND SEDIMENT DIOXIN DELINEATION REPORT  
NCBC GULFPORT MS  
5/19/1999  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

19 May 1999

Art Conrad  
Naval Facilities Engineering Command  
Southern Division  
2155 Eagle Drive  
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North Charleston, South Carolina 29419-9010

Re: Surface Water and Sediment Dioxin Delineation Report, Naval Construction Battalion Center, Gulfport, Mississippi, January 1999.

The Mississippi Office of Pollution Control (OPC) has reviewed the above referenced document and offers the following comments and suggestions.

1. Drainage area boundaries given in Figure 1-4 are not clearly defined and labeled. The text (page 1-8, paragraph 4) refers to this figure to illustrate off base drainage.
2. The text on page 2-2 (paragraph 8) refers to Appendix B for sediment concentrations in samples that do not appear in Appendix B (sample locations D004 and D005 are not included), however the Phase I One Sampling Report included as Appendix A of the report refers to Attachment B of Appendix A for similar information. Perhaps Appendix B as stated in the text should read Attachment B of Appendix A, this is unclear.
3. The text (page 2-2, paragraph 8) states that sample EEN2U contained the highest dioxin sediment concentration in Drainage Area 1, however this location is not shown on the concentration map for Drainage Area 1 (Figure 2-1).
4. The text (page 2-4, paragraph 2) should note that the dioxin concentration at sample location D1010, Sample D1P1, was 114.7 ppt. (taken in April of 1997 as given on page 1-C of Appendix A, Attachment B) in order to illustrate source/concentration trends. The lower concentration of 82.8 ppt was reported on page 2-4 (paragraph 2) and on page 3 (paragraph 9) of Appendix A from a different sample (D1P3) taken at that location (D1010) in June of 1997 (Appendix A, Attachment B, page 1D).

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5. The text (page 2-16, paragraph 5) refers to sampling location L80025 and references Figure 2-3. This location does not appear on Figure 2-3. Perhaps L8825 should read L8025, this needs clarification.
6. Concentrations reported in paragraph 4 of page 2-17 are not given for those sites on the concentration map shown as Figure 2-9. Sampling location TC004 (highest reported concentration of 11.3 ppt) does not appear on the map, and only the sediment results for location TC006 (surface water concentration of 0.5 ppq reported in the text) is shown.
7. The location of Bernard Bayou with respect to the base is unclear in Figure 2-11.
8. The text (page 3-13, paragraph 5) reported a dioxin concentration in the Outfall 3 Swamp of 204 ppt with a TCDD ratio of 85% in sample location W021, although a much higher concentration of 418 ppt with a TCDD ratio of 91% occurred in a sample (WL020) collected about 400 feet to the south as shown in Figure 3-6.
9. The text discussion in paragraph 5 of page 7-1 discusses a proposed sediment removal in Brickyard Bayou, where dioxin sediment concentrations were 28.1 ppt and 29.5 ppt in the two samples collected during the Phase II event (Figure 3-5). Clarification is needed as to whether this is intended to include portions of Bernard Bayou, since dioxin sediment concentrations there were higher (generally 28 ppt to 61 ppt) with similar (2 to 5 percent) TCDD ratios in the five samples taken during the Phase II sampling event (Figure 3-4). Maximum concentrations were also higher in samples collected from Bernard Bayou during phase I (54.3 ppt in Sample BB005) than Brickyard Bayou (19.0 ppt in Sample BC003) as shown in figures 2-11 and 2-10, respectively.

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

Sincerely,  
  
Bob Merrill

cc. James Barksdale, USEPA