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NCBC GULFPORT
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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING WORK PLAN FOR PILOT SCALE SOIL/SEDIMENT TREATABILITY
STUDY SITE 8 NCBC GULFPORT MS
10/4/2001
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

4 October 2001

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

Re: Work Plan for the Pilot-Scale Soil/Sediment Treatability Study, Site 8 Herbicide Orange Study Area, Naval Construction Battalion Center, Gulfport, MS, July 2001.

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

1. Page 1-5, paragraph 2: the statement in the text regarding the "agreed upon soil/sediment remedial goal of 50 nanograms per kilogram dioxin" (parts per trillion or ppt) is incorrect and should be removed, as the soil/sediment cleanup goal has not been finalized for individual properties and exposure scenarios on and off base.
2. Page 1-10 bullet 7, page 2-2 paragraph 3, appendix B page 1-2, paragraph 6: the text describes a process of removal of all contaminated sediment from the Edwards property (located off base in a swampy area) followed by confirmatory sampling for dioxin in order to screen against "the agreed-upon cleanup criterion of 50 nanograms per kilogram" (parts per trillion or ppt). This cleanup goal is not acceptable, as present cleanup standards require removal of soil/sediment with confirmatory sampling to insure compliance with residential risk standards (1E-6 cancer risk). The 50 ppt remedial goal option given in the report greatly exceeds this cleanup standard.

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

Sincerely,

Bob Merrill

cc. Elizabeth Wilde, USEPA