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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING REVIEW OF PROPOSED PLAN SITE 8 NCBC GULFPORT MS
2/21/2002
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

21 February 2002

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

Re: Proposed Plan for Site 8, Former Herbicide Orange Storage Area and Associated Areas,
Naval Construction Battalion Center, Gulfport, Mississippi, February 2002.

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

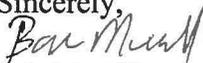
1. Page 13, Remedial Action Objectives Table: the RGO number (102 ppt) for off-site sediments needs to be revisited to evaluate how this number was determined. This number, in relation to the others (15 ppt and 38 ppt for other off base sediments), may raise concerns about its origin.

Table 2 (page 12) reports specific risks to off base receptors, although specific Remedial Goal Options (RGOs) for each risk category are not given in the Proposed Plan or in the Feasibility Study. A table showing the 102 ppt cleanup number (RGO) was given for the $1E-6$ cancer risk category in the Risk Assessment (March 2001, Table 3-14, page 3-44) for Occupational Workers exposed to on base sediment. Off base sediment concentrations were averaged for purposes of the Risk Assessment, resulting in very low risk values. RGO values for receptors to off base sediments in this specific area (Area 3) apparently have not been established.

RGOs for the various risk categories (ie. cancer risk values of $1E-4$, $1E-5$ and $1E-6$) for the area identified as Area 3 (Figure 1B) should be evaluated and presented in tabular form. The final cleanup concentration for sediments in Area 3 should be reflected in this evaluation.

2. Page 16, Short Term Effectiveness Section : the last sentence states that Alternative 4 would attain cleanup in one year. This may give the public the wrong perception of how long this would actually take to accomplish and may be interpreted by the public to say that: if Alternative 4 were approved then the site would be cleaned up next year. Please clarify throughout the document.
3. Page 16, Reduce Toxicity, Mobility or Volume Section: the last two sentences read as if incineration would take place on site. Either these sentences need to be deleted or careful clarification should be given in the text.

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

Sincerely,

Bob Merrill

cc. Elizabeth Wilde, USEPA
Jerry Banks, MDEQ