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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL  
QUALITY REGARDING REVIEW OF FOCUSED FEASIBILITY STUDY SITE 8 NCBC  
GULFPORT MS  
*2/22/2002*  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

22 February 2002

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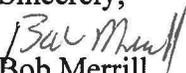
Re: Focused Feasibility Study, Site 8, Herbicide Orange Storage Area, Naval Construction Battalion Center, Gulfport, Mississippi, Final, December 2001.

The Mississippi Office of Pollution Control has reviewed the above referenced document. The document is adequate for the intended purpose, however the origin of the Remedial Goal Option (shown on Table 2-3) of 102 ppt for off base sediments in Area 3 is unclear as discussed below.

Table 2 (page 12) reports specific risks to off base receptors, although specific Remedial Goal Options (RGOs) for each risk category utilizing sediment concentrations observed in Area 3 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 the various risk levels among receptors to off base sediments in this specific area (Area 3) apparently have not been established using observed concentrations for this particular area. Nor does Table 3-14 of the Risk Assessment give RGO values for off base sediments.

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 in tabular form for off base sediment concentration values determined specifically for Area 3. This should follow the general format as the RGO Table 3-14 of the Risk Assessment. The proposed cleanup concentration for sediments in Area 3 should be a product of this evaluation.

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

Sincerely,  
  
Bob Merrill

cc. Elizabeth Wilde, USEPA