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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL  
QUALITY REGARDING DRAFT OFF BASE COMMUNITY SAMPLING REPORT SITE 8 NCBC  
GULFPORT MS  
6/20/2003  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

20 June 2003

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

Re: Draft Off Base Community Sampling Report, Naval Construction Battalion Center Gulfport, Mississippi, May 2003.

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

1. The report references 15.0 ppt as the "MDEQ cleanup goal for dioxin" and apparently utilizes this value as a screening level (for example, page 4-1, paragraphs 1 and 3). **This statement is incorrect as stated repeatedly in previous communications (verbally and written) concerning screening/reporting concentrations for dioxin in previous reports and meetings** (for example, the public presentation of this study and the Draft Site Characterization Report, April 2003).

The MDEQ Tier 1 TRG Tables should be utilized for appropriate screening values. **A formal "Cleanup Goal" of 15 ppt for dioxin has not been established by MDEQ. Also, "cleanup goals" (remedial goal options or RGOs) and screening/reporting concentrations are entirely different value systems** as described in appropriate EPA Guidance Documents.

It has been stated in previous reports submitted by the base (regarding dioxin concentration delineation studies submitted by the base) and discussed informally among DEQ and base staff that 15.0 ppt may be the lowest concentration that can be accurately reproduced (with the highest degree of certainty) in a laboratory. The 15 ppt screening concentration was utilized during certain sampling phases for dioxin sediment concentration delineation over large sampling areas, however this has not been formally established as the MDEQ RGO and, again, is certainly not the MDEQ screening or

reporting concentration for dioxin.

The screening values for all contaminants (including dioxin congeners) are listed on the TRG Table which is located on the DEQ website. The text of this report should be changed to accurately reflect dioxin concentrations in excess of the human health screening level for sediments/soils (TEQ of 4.26 ppt).

**If screening/reporting levels change, those changes will be reflected on the TRG Tables published on the DEQ web page.**

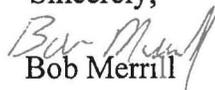
2. The text (page 4-1, paragraph 3) states that TCDD was reported as an estimated (EMPC) concentration for a sample with a TEQ of 35.54 ppt. As stated in previous communications, reporting the concentration of a sample utilizing the EMPC is inappropriate especially when the estimated congener is 2,3,7,8 TCDD since that is a primary constituent of concern (COC) utilized by the base for "foot printing" of dioxin related to Herbicide Orange.

The text states (same paragraph) that a two samples from this group exceeded screening values. The second sample was not discussed.

3. The text (page 4-2, paragraph 2) states that results from sample CS016DP1 showed no MDEQ exceedances, although the concentration of 12.69 ppt is reported on Table A-1 and on the location map (Appendix A). The sample is incorrectly labeled as CS016GP1 on the location map (should read CS016DP1).
4. The text does not discuss all three samples that exceeded MDEQ screening levels for dioxin. Soil samples 6DP1, 13DP2 and 16DP1 are reported at concentrations of 35.54 ppt, 5.68 ppt and 12.68 ppt, respectively (Table A1 and soil sample maps provided in Appendix A). The samples should be evaluated referencing appropriate screening levels (see comment 1) and text should be changed accordingly.

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

Sincerely,

  
Bob Merrill

cc. Rob Pope, USEPA