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NCBC GULFPORT
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LETTER AND COMMENTS FROM U S EPA TO DRAFT SITE CHARACTERIZATION REPORT
OFF BASE AREA OF CONTAMINATION SITE 8 NCBC GULFPORT MS
7/14/2003
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 14, 2003

Art Conrad
Remedial Project Manager
Southern Division, Naval Facilities Engineering Command
2155 Eagle Drive, Post Office Box 190010
Charleston, South Carolina 29419-9010

SUBJ: EPA Comments on the Draft Site Characterization Report for NCBC Gulfport
Offbase Area of Contamination
Naval Construction Battalion Center
Gulfport, Mississippi

Dear Mr Conrad:

Please find enclosed EPA's comments on the above referenced document. EPA is providing these comments to the Navy as part of the consultation provisions of CERCLA. If you have any questions about these comments or any other issue, please feel free to call me at (404)562-8506.

Sincerely,

A handwritten signature in black ink, appearing to read "R. H. Pope".

Robert H. Pope
Federal Facilities Branch
Waste Management Division

cc: Bob Merrill, MDEQ

**EPA COMMENTS ON THE DRAFT SITE CHARACTERIZATION REPORT
FOR NCBC GULFPORT OFFBASE AREA OF CONTAMINATION
NAVAL CONSTRUCTION BATTALION CENTER
GULFPORT, MISSISSIPPI**

GENERAL COMMENTS

1. This document summarizes the characterization, risk evaluations and remedial decisions for the offsite Brownfields properties located downgradient from Site 8. However, the document in its current form contains a number of deficiencies that should be addressed before the conclusions presented in this document can be determined to be correct. These deficiencies are presented in detail in the following comments.
2. The ecological risk assessment performed for this area has not been adequately summarized in this document. A table similar to the human health risk assessment summary table presented on page 7-3 and showing the HIs obtained for each receptor should be included in this report.
3. This report fails to adequately document the biota of this area. While it repeatedly emphasizes that fish, mink, great blue herons and kingfishers are not observed on this site, no list of the biota that may be present on this site has been included. It would seem that habitat of the size and quality described in this document would support significant populations of other wildlife such as night-herons, green herons, egrets, crayfish, small mammals, and amphibians. A list of ecological receptors found at this site should be included with this document.
4. It would not seem that the foodchain evaluation of risks from fish to mink, great blue herons and kingfisher from ingestion of fish from a pond located on Site 8 would have any bearing on potential ecological risks at the Brownfields property. As noted repeatedly in the text, the Brownfields property does not contain habitat which supports fish. It is not clear why some other prey animal, such as crayfish, was not collected for tissue analyses. Also, risks to more appropriate higher trophic-level receptors, such as racoons or night-herons, were not calculated in this ERA. The absence of these data appear to constitute a major data gap. Therefore, conclusions presented on the absence of actionable risks to ecological receptors cannot be considered to be valid based on the information presented.
5. The Remedial Goal (RG) concentration selected for dioxin should be clarified. Section 9.2.1 indicates that the RG value is the technology based limit of 15 ng/Kg for sediments while Figure 2 and other text in Section 9 indicate that the value is selected as 38 ng/kg.

6. This document appears to recommend sediment removal to achieve a reduction in risks to human health. It is not clear that the proposed sediment removal will not result in significant wetland destruction. This area is characterized as a forested cypress/black gum wetland on a flood plain. It is not clear if the forest is to be cut during this removal. Given that the risks to a lifetime resident do not exceed $1E-4$, it should be carefully considered whether the risks warrant the wetland land impacts likely to occur from the proposed action. This document does not provide sufficient detail to address these issues. The proposed actions cannot be considered protective of the environment unless more details are presented regarding sediment removal methods, and plans for minimization or mitigation wetland impacts, as well as, plans for habitat restoration.
7. Section 8.0. The text of this section discusses quality assurance issues in terms of the collection of future samples for various analytical parameters. Since this is a Site Characterization Report, the quality assurance section of this document should discuss specific quality assurance issues that may have been encountered when evaluating the data for samples that have already been collected. The text of this section seems to mimic the typical text in a Sampling and Analysis Plan. This Chapter should be revised to provide the Quality assurance results, not the plan to assure quality in the samples.
8. This report is intended to be a site characterization report for dioxins found on the Brownfields property. However, the actual sample data have not been included in this report. Please include all data collected for dioxin samples at this site, as presented graphically, though illegibly, on Figure 2. In addition, summary data such as frequency of detection, maximum concentration and minimum concentration, etc., are usually presented in a site characterization report. Please develop summary tables for the dioxin results in each medium.

SPECIFIC COMMENTS

1. **Section 1.0, page 1-3.** This section discusses that no rare or endangered species or habitats were observed on this property. Please confirm that coordination with state and federal natural resource agencies occurred and that the agencies concurred with this finding.
2. **Section 3.1, page 3-1.** This section indicates that Site 8 can be seen on Figure 1. This statement does not appear to be accurate. An overview figure showing the spatial relationship between Site 8 and the Brownfields Property should be included in this report. Please add this figure to future versions of this document.
3. **Section 4.4, page 4-3.** This section discusses three “terraces” found at this site. The information presented in the text could be shown much more effectively on a figure. Since this information has direct bearing on the areas proposed for remediation, a figure should be developed that delineates the extent of the three terraces. Please add this figure to future versions of this document.

4. **Section 4.9, page 4-5.** As discussed in the general comments, this summary of the ecological assessment is not complete. This section should be expanded to include the quantitative ecological risk results for each receptor evaluated and include a summary of biota identified in the three-day field survey.
5. **Section 7.2, page 7-3.** The first full paragraph on this page includes the statement, "None of the biological samples exceeded screening level concentrations." Please indicate if these biological samples refer to the human health risk assessment or the ecological risk assessment.
6. **Section 8.2.1.2, page 8-3.** The third full paragraph in this section references Table 3-1. There is no Table 3-1 submitted with this document. Please include Table 3-1 or eliminate the reference.
7. **Section 8.2, page 8-2.** The text of this section references a QAPP that was developed for the samples reported in this Site Characterization Report. Please provide a date and document title for this QAPP in the References section of this document.
8. **Section 9.1.3, page 9-2.** The last sentence in the first paragraph of this section should indicate that the risks for the trespassers and excavation workers were lower than 10^{-6} . Given the uncertainties associated with human health risk assessments in general, the statement that the risks were "much" lower than 10^{-6} is inappropriate.
9. **Section 9.2.2, page 9-3.** Please reference the document that contains the results of the triplicate study analysis for reproducibility of the lowest concentrations of dioxin using method 8290.
10. **Section 9.2.2, page 9-4.** Please provide rationale for the inferring that the turbid groundwater samples from the installed wells are of limited use in risk assessment and do not represent actual contaminant levels dissolved in or capable of migrating with the groundwater. Measured concentrations in groundwater are typically used in human health risk assessments, unless significant quality control issues with the analysis of the samples is encountered.
11. **All Sections.** Please perform a general QC review of the document to review typographical errors. Many spelling errors and incorrect words were found throughout the document.
12. **Figure 2.** The concentration and sample number data shown on this figure are illegible. The quality of this figure must be enhanced so that the area proposed for remediation can be confirmed.

13. **Figure 2.** Based on the information in Section 9.2.1, the RG for dioxins is 15 ppt. Please adjust the line of delineation to correspond with this value rather than the 38 ppt value currently indicated.