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LETTER AND COMMENTS FROM U S EPA REGARDING DRAFT VERIFICATION SAMPLING AND ANALYSIS PLAN SITE 8 NCBC GULFPORT MS
7/23/2003
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 23, 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 Verification Sampling and Analysis Plan
for Site 8-Herbicide Orange Storage Area and Off–Base 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,

Robert H. Pope
Federal Facilities Branch
Waste Management Division

cc: Bob Merrill, MDEQ

EPA COMMENTS ON THE DRAFT VERIFICATION SAMPLING AND ANALYSIS PLAN FOR SITE 8-HERBICIDE ORANGE STORAGE AREA AND THE OFF-BASE AREA OF CONTAMINATION NAVAL CONSTRUCTION BATTALION CENTER GULFPORT, MISSISSIPPI

VSAP - GENERAL COMMENTS

1. There is no indication of the turnaround time that will be requested from the laboratory for the verification sampling results. It is recommended that expedited turnaround time be considered to facilitate review of the verification data prior to the placement of the cap on the consolidated material being landfilled at Site 8A.

VSAP - SPECIFIC COMMENTS

1. **Section 3.2.1, Page 3-2.** The last sentence on this page (continuing on page 3-3) reads: " 'Hot spot' areas will be delineated using half the distance from a 'dirty' sample to the closest clean sample." Please clearly define "dirty" and "clean." It is assumed that a "dirty" sample is one above the PRG and one that is "clean" is below the PRG. The proposal to excavate to a point halfway between the clean and dirty samples is not sufficiently conservative. It is recommended that the excavation extend to the location of the clean sample or, at least to a location where it would be estimated that sediment levels would drop below the PRG. Note that Page 21 of Appendix A (Michigan DEQ Guidance Document on Verification of Soil Remediation) recommends that the radius of excavation around the contaminated sample point should be equal to the grid interval (i.e. 30 feet).

2. **Section 3.2.1, Page 3-3.** The second complete sentence on this page states: "Afterwards, field personnel will resample the original sample location, and the new sample result will replace the original result in the UCL calculation." Thus, only one verification sample is proposed for each hot spot to be excavated. Page 7 of Appendix A (Michigan DEQ Guidance Document on Verification of Soil Remediation) recommends a number of excavation floor samples based on the excavation floor area. According to the proposed excavation method, 900 square feet (i.e. 30 feet X 30 feet) will be excavated to 6 inches at each hotspot. For this area, Appendix A recommends 3 verification samples. Please modify the proposed sampling scheme to conform to the recommendations in Appendix A or provide justification for deviating from the guidance.

3. **Section 3.2.3, page 3-4.** This section discuss the proposed long-term monitoring program for Site 8 groundwater. If there are no PRG exceedances after the first year of quarterly monitoring, the plan proposes annual monitoring for Years 2

through 5. Please describe how annual monitoring will be done in a manner that will incorporate any temporal or seasonal impacts on the groundwater.

4. **Section 3.2.5, Page 3-5** The proposal to excavate to a point halfway between the clean and dirty samples does not seem to be conservative. It is recommended that the excavation extend to the location of the clean sample or, at least to a location where it would be estimated that sediment levels would drop below the TRG.

5. **Section 3.2.5, Page 3-5**. The second sentence of the second paragraph in this section states: "If the 95 UCL of the mean TEQ concentration is greater than 4.3 ng/kg, 'hot spot' excavations will be performed until the PRG is achieved." First, should the text read "TRG' as opposed to "PRG"? Also, does the Navy intend to excavate each hot spot until a value below the TRG is obtained, as this sentence implies, or is the intention to excavate until the 95% UCL of the mean of all samples is below the TRG, as is stated later in the paragraph? Please clarify the text.

6. **Section 4.4, pages 4-2 and 4-3.** This section describes the soil and sediment sampling approach. It is recommended that sediment sampling be performed in a manner that will prevent disturbance and possible cross-contamination of downstream sediments. For example, sediments could be collected starting downstream and working upstream. This is recommended especially if there is flowing water present in the drainage channels. Please provide more detail regarding the approach to sediment sampling that will be used to minimize possible cross-contamination.

7. **Section 6.2, page 6-1.** This section briefly describes the data validation to be performed for this project. This section references an outdated version of the National Functional Guidelines for Organic Data Review (June 1991). The most recent version of EPA guidance should be used for data validation. In addition, the National Functional Guidelines for Organic Data Review (EPA, 1999a) does not address dioxin/furan data specifically. EPA issued National Functional Guidelines for Chlorinated Dioxin/Furan Data Review in August 2002. (EPA, 2002) This guidance should also be utilized during validation of the data for this project. EPA Region 4 also has data validation procedures which should be considered during validation of the data for this project. (EPA, 1999b) Data validation is also discussed in Sections 11.2.2 and 12.5 of the Quality Assurance Project Plan (Appendix C of this VSAP). Any changes made to Section 6.2 should be incorporated into the appropriate sections of the QAPP as well.

References:

EPA, 1999a. USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, EPA540/R-99/008, October 1999.

EPA, 1999b. Data Validation Standard Operating Procedures for Contract Laboratory

Program Routine Analytical Services, USEPA Region IV, Revision 2.1, July 1999.

EPA, 2002. USEPA Analytical Operations/Data Quality Center (AOC) National Functional Guidelines for Dioxin/Furan Data Review, EPA540-R-02-003, August 2002.

QAPP - GENERAL COMMENTS

None.

QAPP - SPECIFIC COMMENTS

1. **Section 5.0, page 5-1.** This section of the QAPP references several other documents that address the sampling procedures to be utilized for the verification sampling. Probably due to the size of these documents, they are not included as part of the VSAP document. At a minimum, this section should include a project-specific table which provides the sample volume to be collected for each media, sample container and preservation requirements and holding times.