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



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

8 August 2003

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

Re: Off Base Community Sampling Report, Naval Construction Battalion Center Gulfport, Mississippi, Draft (Revision 1), July 2003.

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

The report (eg. page 4-1, paragraph 2) references 15.0 ppt as "the MDEQ cleanup goal" for dioxin contaminated soils. As stated in comment number one of the comment letter (dated 20 June 2003) concerning the previous version of this report (dated May 2003), a cleanup goal of 15.0 ppt for dioxin has not been established by MDEQ. All language referencing a cleanup goal, screening level, or any other regulatory level of 15.0 ppt should be removed from the report. Please consult the TRG Table located at the MDEQ website for appropriate screening levels.

Comment number one of the 20 June 2003 letter (concerning the previous version of this report) is reproduced below for clarity concerning regulatory threshold values for dioxin utilized by MDEQ.

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.**

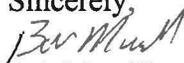
**Also, "cleanup goals" (remedial goal options or RGOs) and screening/reporting concentrations are entirely different value systems as described in appropriate EPA Guidance Documents.**

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.**

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

Sincerely,  
  
Bob Merrill

cc. Rob Pope, USEPA