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NCBC GULFPORT
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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING DRAFT TIER 1 RISK EVALUATION STEPS 1 THROUGH 3 FOR OFF
BASE AREA OF CONTAMINATION SITE 8 NCBC GULFPORT MS

7/30/2004

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



STATE OF MISSISSIPPI
HALEY BARBOUR
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

30 July 2004

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

Re: Draft Tier 3 Risk Evaluation, Steps 1 Through 3 for Off-base Area of Contamination Associated with Site 8 Herbicide Orange Storage Area, Naval Construction Battalion Center Gulfport, Mississippi, June 2004.

The Mississippi Office of Pollution Control (OPC) has reviewed the above referenced document. Comments submitted by other reviewers for EPA and the Stakeholders (U.S. Fish and Wildlife, National Oceanographic and Aeronautic Administration) have been reviewed in conjunction with this document. OPC concurs with all comments submitted and offers the following comments in addition to those submitted by other reviewers. OPC requests that the document be re-submitted in draft form to afford another review by all concerned parties before the document is submitted in final form. The document will be considered to be adequate for the intent when all comments submitted by the various reviewers have been adequately addressed. A scientific management decision point (SMDP) may then be addressed (in accordance with EPA guidance) to determine the future disposition of the Tier 3 Ecological Risk Evaluation.

1. A Screening Level Risk Assessment (SLRA) has not been submitted for the area. The SLRA submitted (2001) for off base areas specifically excluded the Outfall 3 Swamp area occupied by this (Brownfields) site. The present Draft Tier 3 Risk Evaluation does not contain screening level elements that would qualify it as a stand alone document that addresses steps 1 through 3 of a Risk Assessment.
2. Clarification is needed concerning the number and location of site specific full suite (Target Compound List) samples collected from the various media in order to demonstrate how the screening process for contaminants of concern evolved. Demonstration that dioxin is the only contaminant of concern is apparently lacking for this site. It is noted that delineation samples were collected in areas both upgradient and

down gradient of the site, however site specific full suite samples are apparently lacking.

3. Clarification is needed concerning the number and location of zero concentration samples collected from sediment and soil to demonstrate the lateral (and vertical) extent of contamination at this site.
4. Clarification is needed concerning the evaluation of the surface water medium. The chemical disposition of this medium should be demonstrated by site specific sampling and screening. This medium is apparently disregarded in this document.
5. A drainage map should be included to show drainage source areas occupied by sites 8A, 8B and 8C and the spatial relationship with the various off base areas (especially the Outfall 3 Swamp area comprising the Brownfields Site).
6. Clarification is needed concerning the use of rat exposure and toxicity data to estimate that of the mink (page 3-12, paragraph 2). Research concerning the availability of data to specifically address the mink should be conducted and, if available, should be used in place of rat data.

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

Sincerely,

Bob Merrill

cc. Michelle Thornton, USEPA