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NCBC GULFPORT
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LETTER AND COMMENTS FROM U S EPA REGARDING REVIEW OF ONE-HUNDRED
PERCENT REMEDIAL DESIGN SITE B STORAGE AREA AND OFF BASE AREA OF
CONTAMINATION SITE 8 NCBC GULFPORT MS

11/18/2004

U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

November 18, 2004

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

RE: 100% Remedial Design for Site 8-Herbicide Orange Storage Area and Off-base Contamination
Naval Construction Battalion Center, Gulfport, Mississippi

Dear Mr. Conrad:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the above-mentioned document. While, the EPA understands that the document is meant to be a brief report which summarizes the design basis for the remedial alternative selected in the Focused Feasibility Study for Site 8, additional clarification is needed to ensure that the document is not misleading to a new reader. Specifically, it should be made clear in the text that the 2004 Tier 3 Ecological Risk Evaluation did not address ecological risks on base--only off-base areas of contamination were addressed.

Specific comments:

1. The ecological risk assessment is discussed on pages 2-11 thru-2-12. One sentence is provided at the beginning of the section mentioning the 2001 screening level ecological risk assessment (SLERA). Additional information should be provided explaining that this SLERA did not include the off-base AOC and therefore was not applicable to this investigation. Additional sampling has been or will be performed to fulfill requirements in Steps 1 and 2 of the ERA process and to supplement the Tier 3 Ecological Risk Evaluation performed in 2004.
2. It is important that the risk assessment include the latest key decisions and information from our Tier 1 meetings and phone calls. For example, the team has agreed on several items: (1) additional sampling for comparison with screening values; (2) the entire AOC

area will be delineated as a wetland; and (3) while risks to mammalian and avian wildlife are not exceptionally elevated, risks are there.

If you have any questions, please feel free to contact me via e-mail or thornton.michelle@epa.gov or via phone at (404) 562-8526.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle P. Thornton", with a long horizontal flourish extending to the right.

Michelle P. Thornton
Remedial Project Manager
U.S. EPA, Region 4

cc: Bob Merrill, MDEQ