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NCBC GULFPORT
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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING REMEDIAL INVESTIGATION AND FEASIBILITY STUDY SITE 10
NCBC GULFPORT MS
11/30/2006
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

30 November 2006

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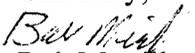
Re: Remedial Investigation and Feasibility Study for Site 10 (Parade Field Ditch), Naval Construction Battalion Center Gulfport, Mississippi, Draft, June 2005.

The Mississippi Office of Pollution Control has reviewed the above referenced document. The document provides a thorough presentation of all sampling events conducted at the site and a complete evaluation of contaminant extent as well as fate and transport mechanisms. The accompanying Feasibility Study evaluates several remedial alternatives that appear (conceptually) to be protective of human health and the environment. The report is adequate for the intent and should be issued as final after the following concerns are addressed.

1. Section 6.4, page 6-7; the Ecological Evaluation references the (MDEQ Ecological Checklist" and evaluates the site using criteria specified in that guidance. This guidance addresses only sites that belong in the Brownfields Program, and is not intended to supersede EPA Guidance for Installation Restoration Program sites that follow EPA protocol for ecological risk evaluation. Please refer to (and reference) EPA Ecological Risk Assessment Guidance for initial ecological screening (phases 1 and 2) at this site. If further ecological risk evaluation is appropriate, EPA guidance should continue to be followed.
2. The feasibility Study would be easier to follow if the document format was consistent with the remedial technology screening process. The initial portion of the Feasibility Study presented in Sections 8 and 9 (beginning on page 8-1) does not clearly evaluate individual remedial technologies utilizing each of the 9 criteria specified in EPA (1988) feasibility study guidance. The text (page 9-1, last paragraph) states that three evaluation criteria (effectiveness, implementability and cost) were retained for evaluation of remedial alternatives, without first presenting the evaluations and reasons for eliminating

the other 6 criteria. Remedial technologies and evaluation criteria are discussed in subsequent portions of the document (pages 10-1 through 10-23). The detailed evaluations should be presented first, then refined through retention of pertinent evaluation criteria and screening of remedial technologies.

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

Sincerely,

Bob Merrill

cc. Julie Corkran, USEPA