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LETTER FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY REGARDING  
ADDITIONAL DIOXIN CONTAMINATED INVESTIGATION AREAS NCBC GULFPORT MS  
7/12/2007  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
TRUDY D. FISHER, EXECUTIVE DIRECTOR

July 12, 2007

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

**RE: NCBC Dioxin investigations**

**Dear Mr. Conrad:**

**It has been brought to the attention of the Mississippi Department of Environmental Quality that additional areas have been identified that require additional investigation by the Navy for dioxin and other contaminants. First, information from a 1985 document, not on file at MDEQ, reported levels of dioxin contamination in the surface water pathways north of the base and in Turkey Creek that are of concern. Also, it is reported that dredged sediments from the area of Canal Road and Turkey Creek were placed on a number of residential properties. Therefore, based on this document and additional information provided to us by residents, the Navy is required to investigate the following areas of concern (AOC) and provide MDEQ with a work plan for conducting the investigations and removals (if required) within sixty (60) days of receipt of this letter:**

- 1) Area of Concern 1 (AOC 1) – A man employed at the base disposed of marked (as Herbicide Orange) drums at a non-permitted disposal site located between the old and new Gulfport rubbish landfills off Canal Road located at SW/4, NW/4, NW/4 Sec. 31, T 7 S, R 11W. According to the witness, an estimated 30 to 50 drums were buried at this site.**
- 2) Area of Concern 2 (AOC 2) - The 1985 report indicated dioxin concentrations of concern in Turkey Creek in the area of intersection with Canal Road (SW/4 Sec. 30, T. 7 N., R 11 W.). These areas were**

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**excavated and the soil placed not only along the south side of Turkey Creek but some of this dirt was placed on approximately four residential sites near the creek. All of the excavated soil piles and residential properties shall be sampled for dioxins and 25% of the samples shall also be analyzed for the (full suite) Target Compound List (TCL). Additionally, the two homes closest to Turkey Creek ( Mrs. Hansen's mother and uncle) have wells that shall be sampled for the full suite of contaminants as well as dioxin.**

- 3) Area of Concern 3 (AOC 3) – This occupies the area located between the old Gulfport Rubbish Landfill and Turkey Creek ( NW/4, NW/4 Sec. 31, T. 7 S., R. 11 W.). Apparently two trenches approximately 150 feet long and 20 to 25 feet deep were filled with contaminated soil from the base. The top ten feet (approximate) of landfill cover was apparently composed of the original soil from the excavation. A ditch was dug from the trenches that extend to Turkey Creek. This ditch (sediment and surface water if present) shall be sampled for dioxins and TCL.**
- 4) Area of Concern 4 (AOC 4) – Soil and sediment excavated from drainage ditches in the local area was reportedly disposed of in the southeast portion of the present Gulfport Rubbish Landfill located in the SW/4, NW/4 Sec. 31, T. 7 S., R. 11 W. This area is north of the natural drainage pathway and current restoration area associated with Outfall 3. These soils shall be located and sampled for dioxin contamination and TCL.**
- 5) Area of Concern 5 (AOC 5) – The 1985 report indicates dioxin concentrations of concern in sediments sampled along the segment of Turkey Creek (located in the NW/4 of Sec. 31, T. 7S, R 11 W) that extends alongside the property of Mr. Simmons and eastward along the segment of the pathway located near the property of Mrs. Marie Hansen's mother. Sediment and surface water samples along these drainage pathways has not been reported to date and will be required as part of this sampling investigation. The sampling shall include dioxin and TCL.**
- 6) The long term periodic sampling of Canal No. 1 and Turkey Creek will be required in order to monitor potential leachate contamination of Turkey Creek from landfills located along the pathway. This is necessary to assure that the landfill leachate into Canal No. 1 and thence to Turkey Creek does not pose a risk to human health or the environment. The sampling shall include both sediments and surface water with analyses for dioxin and TCL.**
- 7) Sediment and surface water sampling shall be conducted along the surface water pathway located adjacent to the active permitted rubbish**

**landfill and extending northeastward past (east of) the old landfill and dump site. This surface water pathway occupies portions of the NW/4, NW/4, Sec. 31, T. 7S, R 11 W. It was reported to us that this area had been sampled by the Navy to some degree but that data has not been made available to MDEQ. If the old data can be located and submitted to MDEQ, we will evaluate whether or not additional sampling is needed.**

- 8) The Navy shall provide a detailed work plan for providing MDEQ with documentation that all drainage pathways from the base that once potentially carried dioxin contamination off-site and have been excavated to improve drainage have been examined in detail (walked). Any obvious sediment excavation piles along these drainage pathways shall be identified, sampled (as discussed in item 2 above) and remediated (removed) as necessary.**

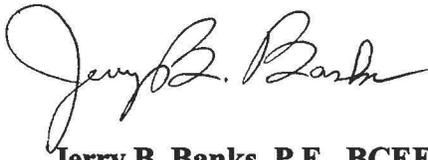
**All of the required investigations shall have formal work plan(s) submitted to MDEQ for review and approval prior to conducting the work. The work plans shall cover all aspects of the investigations (including sampling, number of samples, sampling methods, constituents to be sampled for, etc.). Subsequent Remedial Plan(s) addressing removal of contaminants (if necessary) and transport procedures will require approval by MDEQ prior to initiation of the remedial process. All excavated contaminated soils shall be transported in covered vehicles/trailers. Vehicles/trailers used to transport contaminated soil shall not be overfilled. Vehicles/trailers shall be lined and dust suppression methods will be required in order to prevent loss of contaminated soils during transport. Confirmatory sampling will be required for all areas of contaminant removal.**

**Additionally, I am greatly concerned about information that I have received concerning the closing of areas 8B and 8C on the base. These two areas continue to be of great concern to MDEQ and it is imperative that the closure of these two areas be accomplished in accordance with MDEQ approved closure plans to assure that there is no future migration of contaminants (dioxin contaminated soil) from these areas to other (on and off base) areas.**

**MDEQ has not approved a closure plan for areas 8B and 8C. Also, it is our opinion that it is premature for a closure plan for these areas when MDEQ is requiring additional investigations that may find additional contaminated soils that may have to be either disposed of off-site or returned to these areas for consolidation/stabilization. It was my understanding that these two areas would be closed with soil/sediment stabilization measures used at Site 8A. I am hearing information that a different closure method is being considered.**

**We must move forward to get these investigations accomplished in a timely manner. If you would like to meet to discuss this matter further please contact Phillip Weathersby or myself as soon as possible.**

**Sincerely,**

A handwritten signature in black ink, appearing to read "Jerry B. Banks". The signature is fluid and cursive, with the first name "Jerry" and last name "Banks" clearly legible.

**Jerry B. Banks, P.E., BCEE  
Chief, Groundwater Assessment & Remediation Division**

**cc: Gordon Crane**