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PUBLIC NOTICE REGARDING PROPOSED PLAN SITE 5 NCBC GULFPORT MS
5/1/2008
NCBC GULFPORT

Proposed Plan for Site 5 – Heavy Equipment Training Area Landfill

Naval Construction Battalion Center Gulfport

Gulfport, Mississippi

May 2008

NAVY ANNOUNCES PROPOSED PLAN

This Proposed Plan presents the Navy's preliminary recommendation to address contaminants found in the soil and groundwater at Site 5, Heavy Equipment Training Area Landfill, at Naval Construction Battalion Center (NCBC) Gulfport. This Proposed Plan was developed by the Navy, as the lead agency, following United States Environmental Protection Agency (USEPA) and the Mississippi Department of Environmental Quality (MDEQ) policies and procedures.

This Proposed Plan provides environmental information about the site, summarizes the remedial alternatives that were evaluated, provides the rationale that supports the **Preferred Alternative** for cleaning up Site 5, and summarizes information found in greater detail in the **Remedial Investigation (RI)** and **Feasibility Study (FS)** at Site 5 – Heavy Equipment Training Area Landfill at Naval Construction Battalion Center.

The Navy is issuing this Proposed Plan as part of its public participation responsibilities under Section 117 (a) of the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, as amended, and Section 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The public is invited to comment on this Proposed Plan during the Public Comment Period beginning on May 13, 2008, and ending on June 13, 2008. The Proposed Plan and other site documents are available for review at the NCBC Gulfport Information Repository, which is located in the Gulfport Library (see box at right for more information). Public comments will be considered in the selection of the final remedy and will be addressed in the Decision Document for the site.

SITE BACKGROUND AND HISTORY

NCBC Gulfport is a Navy base located in the western part of Gulfport, Mississippi, in the southeastern part of Harrison County, about 1.2 miles north of the Gulf of Mexico (see Figure 1).



Site 5 has been used for heavy equipment training.



MARK YOUR CALENDAR

PUBLIC COMMENT PERIOD:
May 13, 2008 to June 13, 2008

The Navy will accept written comments on the Proposed Plan during the Public Comment Period.

PUBLIC MEETING:
May 13, 2008

The Navy will hold a public meeting to explain the Proposed Plan and all of the alternatives presented in the Feasibility Study. Written comments will also be accepted during the meeting, which will be held at the Crystal Inn at the intersection of I-10 and Canal Road in Gulfport, MS.

INFORMATION REPOSITORY

All the technical and public information publications prepared to date for the site are available at the following location:

Gulfport Library
47 Maples Drive #1
Gulfport, MS 39507
(228) 871-7171



For more information about this Plan, please call Mr. Gordon Crane, NCBC Gulfport at (228) 871-3118.



Figure 1 – Location of the Base

Site 5 is a former landfill located in the southwestern section of NCBC Gulfport. The landfill is approximately 6 acres in size and it is currently used for heavy equipment (bulldozer and forklift) training. It is located approximately 200 feet west of the intersection of 4th Street and Colby Avenue. The northwestern boundary is the Driving Range, and the western and southern boundaries are defined by a drainage ditch (Canal No. 1).

The site is flat with the exception of a large earthen mound near the middle of the site. This mound was used for the heavy equipment training at the site. An asphalt road at the site is used for truck driver training. The drainage ditch at Site 5 is approximately 30 feet wide, and the water in the canal is typically between 1 to 4 feet deep. The site is mostly free of vegetation but is surrounded by trees and various other types of vegetation on all but the northern edge. The base boundary is located about 40 feet to the west, and family housing is located approximately 50 feet to the south.

This landfill was operated from 1972 to 1976 and was the only operating landfill on the base during this time. Solid waste, such as solid dumpster waste, construction debris, and general refuse made up the bulk of the materials disposed of at Site 5, but an unknown volume of liquid wastes were also disposed of at the landfill. After landfilling activities were stopped, the site was covered with 4 to 6 feet of fine- to medium-grained sand and was used as a heavy equipment training area, including bulldozer and dump truck operation training.

Low levels of contaminants were measured in 1987 as part of an Initial Assessment Study. Additional samples were collected in 1997 as part of a **surface water, groundwater, and sediment** investigation. During that investigation, **dioxins** were detected in samples of groundwater collected from beneath the site.

In order to fully define the nature and extent of contamination at the site, an **RI** was conducted in 2001 and 2002 with a followup surface soil study in March 2006. The **RI** consisted of a geophysical survey as well as surface soil, subsurface soil, groundwater, **surface water**, and **sediment** sampling. Refer to the **RI** report for a more detailed discussion

The **Remedial Investigation** Report (2007) concluded that the conditions at Site 5 were similar to a typical municipal landfill and that a **presumptive remedy** approach would be applied at this site to expedite the cleanup. (See highlight box on page 3 for more information about **presumptive remedies**.)

SITE CHARACTERISTICS

As part of the **Remedial Investigation** soil, groundwater, **surface water**, and **sediment** samples were collected and analyzed to evaluate the nature and extent of contamination at the site. A summary of the findings follow:

Surface Soil

- Arsenic was detected in all surface soil samples at concentrations greater than the MDEQ regulatory level for unrestricted use (generally residential use) of 0.43 parts per million (ppm) but less than the MDEQ regulatory level for restricted use (generally industrial use) of 3.82 ppm.
- **Dioxins** and **furans** were reported at very low levels in each surface soil sample. The reported levels ranged from 1.2 parts per trillion (ppt) to 8.69 ppt. The average level was 5.04 ppt, which is greater than the MDEQ regulatory level for unrestricted use of 4.26 ppt, but less than the MDEQ regulatory level for restricted use of 38 ppt.

Presumptive Remedy for Military Landfills

In the early 1990s, the USEPA began looking at various ways to streamline environmental restoration. One approach was to use standardized, proven technologies to clean up similar sites, such as municipal landfills. These standardized technologies for specific categories of sites are called "presumptive remedies." These presumptive remedies have been shown to ensure consistency in remedy selection and reduce the cost and time required for investigations and remediation of similar types of sites.

The USEPA has published guidance documents that specifically encourage source containment for military landfills with characteristics similar to municipal landfills. The application of containment as the presumptive remedy most often requires the design and installation of some form of landfill surface cover designed to meet the following three goals:

- Minimize infiltration of water that could dissolve contaminants in the landfill.
- Prevent direct contact with the landfill wastes and prevent movement of the waste by wind or water.
- Prevent exposure to landfill gas.

Site 5 has the characteristics and the low levels of contaminants mentioned in the USEPA guidance. According to this guidance and based on the characteristics of the site, containment using a final cover that minimizes the passage of water was considered to be the best alternative.

Subsurface Soil

- Some arsenic concentrations in the subsurface soil were greater than the MDEQ regulatory level for unrestricted use, but all were less than the MDEQ regulatory level for restricted use.
- **Dioxins** were detected site-wide in subsurface soil, but concentrations greater than the MDEQ regulatory level for unrestricted use were limited to three locations, and all were less than the MDEQ regulatory level for restricted use.

Groundwater

- Benzo(a)anthracene (BaA) was detected at a concentration greater than its MDEQ regulatory level in one on-site monitoring well.
- The total concentration of **dioxins** and **furans** was above the MDEQ regulatory level.
- No groundwater contamination extending from the site was identified. Information gathered during the sampling events suggests that all contaminants on site are beneath the footprint of the disposal area.

Surface Water and Sediment

- No contaminants were detected in the surface water at concentrations greater than the MDEQ regulatory levels.
- Arsenic was detected in all **sediment** samples at concentrations greater than the MDEQ regulatory level for unrestricted use but greater than the MDEQ regulatory level for restricted use only in the most upstream sample.
- **Dioxins** were detected in all **sediment** samples, but the concentration was greater than the MDEQ regulatory level for unrestricted use in only one sample, but was less than the MDEQ regulatory level for restricted use.

Other Findings

- A geophysical survey and surface soil, subsurface soil, groundwater, **surface water**, and **sediment** sampling were conducted to address concerns about potential burial of drums containing **Herbicide Orange (HO)** at the site. Neither the results of the sampling nor the geophysical survey found evidence of buried drums.
- The **dioxins** and **furans** found at the site are not related to **Herbicide Orange** found at Site 8. **Octachlorodibenzo-p-dioxin (OCDD)** and **heptachlorodibenzo-p-dioxin (HpCDD)** were the particular **dioxins** that were found most often. (Refer to the "Contaminants of Concern at Site 5" highlight box on page 8 for more information). These **dioxins** are typically found as a result of common industrial activities such as vehicle exhausts, combustion, and incineration, rather than the disposal of **Herbicide Orange**.

SCOPE AND ROLE OF THE ACTION

The environmental concerns at NCBC Gulfport are complex. As part of the Navy's Installation Restoration program, an Initial Assessment Study of the base was performed in the 1980s, and nine sites were identified for further investigation. None of the sites nor the base have been placed on the CERCLA National Priorities List. Investigations and cleanup activities are being performed following CERCLA regulations. A Decision Document has been completed for one site, and cleanup is being performed or has been completed at four sites. Four other sites are in the RI/FS stage.

The remedy described in this Proposed Plan is intended to be the only remedial action at Site 5 and addresses risks to workers and trespassers exposed to soil, surface water, and sediment. The potential risk from the use of shallow groundwater is also addressed. No other remedial actions have been performed at the site.

SUMMARY OF SITE RISKS

Human Health Risk Assessment: The **Human Health Risk Assessment** for Site 5 evaluated potential risks for site workers and trespassers assumed to be exposed to soil, **surface water**, and **sediment** and determined that the potential risks were less than or within USEPA benchmarks but greater than MDEQ benchmarks. Although a residential use is unlikely, the potential risk for residential use of the site was also evaluated and it was concluded that the groundwater would not be suitable as drinking water. Contaminants that have the highest potential risk are arsenic, **dioxins/furans**, and benzo(a)anthracene.

Ecological Risk Assessment: Concentrations of a number of contaminants were greater than levels that have been determined to pose a potential risk to the environment. However, when factors that affect habitat, such as quality and size of the habitat and actual use of the site, the overall level of ecological risk of the site was determined to be minimal.

In summary, exposure to soil and groundwater at Site 5 poses an unacceptable risk only in a residential scenario. It is the Navy's current judgment that the **Preferred Alternative** identified in this Proposed Plan is necessary to protect public health or welfare or the environment from actual or threatened releases of pollutants, contaminants, or hazardous substances from this site, which may present an imminent and substantial endangerment to public health or welfare.

REMEDIAL ACTION OBJECTIVES

To prevent unacceptable human health risk, the following **Remedial Action Objectives** for Site 5 were identified:

Remedial Action Objective # 1: Prevent direct exposure to contaminated soil and waste disposed at Site 5, therefore eliminating unacceptable human exposure to those contents.

Remedial Action Objective # 2: Reduce the migration of contaminants to groundwater.

Remedial Action Objective # 3: Prevent residential exposure to and consumption of groundwater.

Remedial Action Objective # 4: Comply with federal and state legal requirements and guidelines, referred to as **Applicable or Relevant and Appropriate Requirements** and To Be Considered guidelines (See "What are ARARs?" highlight box on page 6).

Because a **presumptive remedy** is proposed for this site, the evaluation of alternatives is streamlined.

SUMMARY OF REMEDIAL ALTERNATIVES

The following section summarizes the remedial alternatives developed for Site 5:

Alternative 1: No Action

A "no action" alternative is always used as a baseline for comparison. This alternative assumes that no changes would be made to the existing conditions at the site.

Alternative 2: Cap, Ditch Lining, Land Use Controls, and Monitoring

This alternative consists of the following components: (1) waste containment, (2) excavation, (3) **surface water** and **sediment** control, (4) **land use controls**, (5) landfill gas management, and (6) monitoring. The covered site would be available for recreational uses.



Aerial View of Site 5

Waste containment would be accomplished using a surface cover consistent with MDEQ regulations. Prior to installing the final cover, the site will be regraded to promote runoff from the site.

This final cover would prevent direct contact with contaminated surface soil, minimize rainfall passing through the soil that could carry contaminants to groundwater, and prevent transport of contaminants from the landfill site to the ditch due to erosion. The top layer of the final cover would be topsoil that is planted with grass.

EVALUATION OF ALTERNATIVES

The remedial alternatives were compared to each other using the nine criteria established by the **NCP** (See highlight box on page 6). Please consult the Site 5 **Feasibility Study (FS)** report for more detailed information. The following is a summary of these comparisons.

Overall Protection of Human Health and the Environment

Alternative 1 would not be protective of human health and the environment because there would be nothing to prevent exposure to contaminants in soil and groundwater. Also, the waste disposed in the landfill could be exposed and transported to **surface water** through erosion.

Alternative 2 would be protective of human health and the environment. A final cover would be installed over the area of contamination to ensure that recreational site users would be protected from exposure to unacceptable levels of contaminants. The use of **land use controls** would restrict residential and commercial/industrial uses of the site and prevent potential exposure to unacceptable levels of contaminants in the soil and groundwater that would remain under the capped area. All of the **Remedial Action Objectives** would be met under this alternative.

Compliance with ARARs and To Be Considered (TBCs) guidelines

ARARs and **TBCs** establish the regulatory constraints of the cleanup. See the “What are ARARs?” highlight box on page 6 for more information about **ARARs**.

Chemical-Specific Requirements: Alternative 2 would comply with chemical-specific **ARARs** because exposure to soil with contaminant concentrations greater than the regulatory criteria would be prevented. Alternative 1 would not comply with chemical-specific **ARARs** because unacceptable levels of contaminants would remain at the site and exposure to the contaminants would not be controlled.

Action-Specific Requirements: Alternative 2 complies with action-specific requirements. Alternative 1 was not evaluated for action-specific requirements because no action would be conducted for that alternative.



Alternative 2 would implement the presumptive remedy for military landfills, which includes containment, surface water and sediment controls, landfill gas management, and land use controls.

Sediment and soil would be excavated from the bottoms and landfill-sides of the ditches on the western and southern sides of the site so that the ditch can be lined with grouted rock. The excavated **sediment** and soil would be disposed on site at Site 5 during initial regrading and prior to final cover installation. The sides and bottoms of the ditches would be lined with grouted riprap extending to the top of the banks to prevent erosion of soil and waste and to reduce the flow of groundwater from the site into the **surface water** of the ditches.

Land use controls would be developed and implemented to prevent residential development, digging, and groundwater use at Site 5. Periodic inspections would be conducted to ensure that the cover has not been damaged and to determine whether maintenance of the surface protection features is required because the site would be available for recreational uses.

Periodic groundwater monitoring would consist of collecting groundwater samples from selected existing and new wells and analyzing these samples for arsenic, **dioxins/furans**, and benzo(a)anthracene. Additionally, **soil gas** monitoring wells installed on the perimeter of the site would be sampled quarterly for methane.

What are ARARs?

ARAR stands for “Applicable or Relevant and Appropriate Requirement.” Three types of legal requirements are addressed in a cleanup action:

Chemical-specific ARARs address concentrations of contaminants that must be cleaned up. The MDEQ Target Cleanup Goals are chemical-specific **ARARs** for Site 5.

Action-specific ARARs regulate how a cleanup remedy is implemented. Regulations define where and how contaminants are managed.

Location-specific ARARs address legal issues for special locations such as wetlands and tribal lands. There are no location-specific **ARARs** for Site 5.

Location-Specific Requirements: There are no location-specific **ARARs** for either alternative.

Long-Term Effectiveness and Permanence

Alternative 1 would not have long-term effectiveness or permanence. Alternative 2 would be long-term effective and permanent. Under this alternative, contaminated soil would be capped.

Reduction of Toxicity, Mobility, or Volume through Treatment

Alternative 1 would not achieve any reduction of toxicity, mobility, or volume of contaminated media through treatment.

There is no treatment in Alternative 2 but the movement of contaminants in soil would be reduced by minimizing the infiltration of water into the landfill.

Short-Term Effectiveness

Implementation of Alternative 1 would not result in risks to site workers or adversely impact the surrounding community or environment because no remedial activities would be performed.

Implementation of Alternative 2 would result in the possibility of exposing construction workers to contamination during remedial activities. However, the risk of exposure would be effectively controlled by the implementation of engineering controls (e.g., dust suppression) and compliance with applicable regulations and proper site-specific health and safety procedures.

NINE EVALUATION CRITERIA FOR CLEANUP ALTERNATIVES

Threshold Criteria (The selected remedy must satisfy these criteria):

Overall Protectiveness of Human Health and the Environment determines whether an alternative eliminates, reduces, or controls threats to public health and the environment through **land use controls** or treatment.

Compliance with ARARs evaluates whether the alternative meets federal and state environmental statutes, regulations, and other requirements that pertain to the site, or whether a waiver is justified.

Balancing Criteria (These criteria are used to weigh the relative merits of the alternatives):

Long-Term Effectiveness and Permanence considers the ability of an alternative to maintain protection of human health and the environment over time.

Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment evaluates an alternative’s use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

Short-Term Effectiveness considers the length of time needed to implement an alternative and the risk the alternative poses to workers, residents, and the environment during implementation.

Implementability considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.

Cost includes estimated capital and annual operation and maintenance costs, as well as present worth cost. Present worth cost is the total cost of an alternative over time in terms of today’s dollar value. Cost estimates are expected to be accurate within a range of +50 to -30 percent.

Modifying Criteria (These criteria are also considered during remedy selection):

State/Support Agency Acceptance considers whether the state agrees with the Navy’s analyses and recommendations, as detailed in the **RI, FS**, and Proposed Plan.

Community Acceptance considers whether the local community agrees with the Navy’s analyses and **Preferred Alternative**. Comments received on the Proposed Plan are an important indicator of community acceptance.

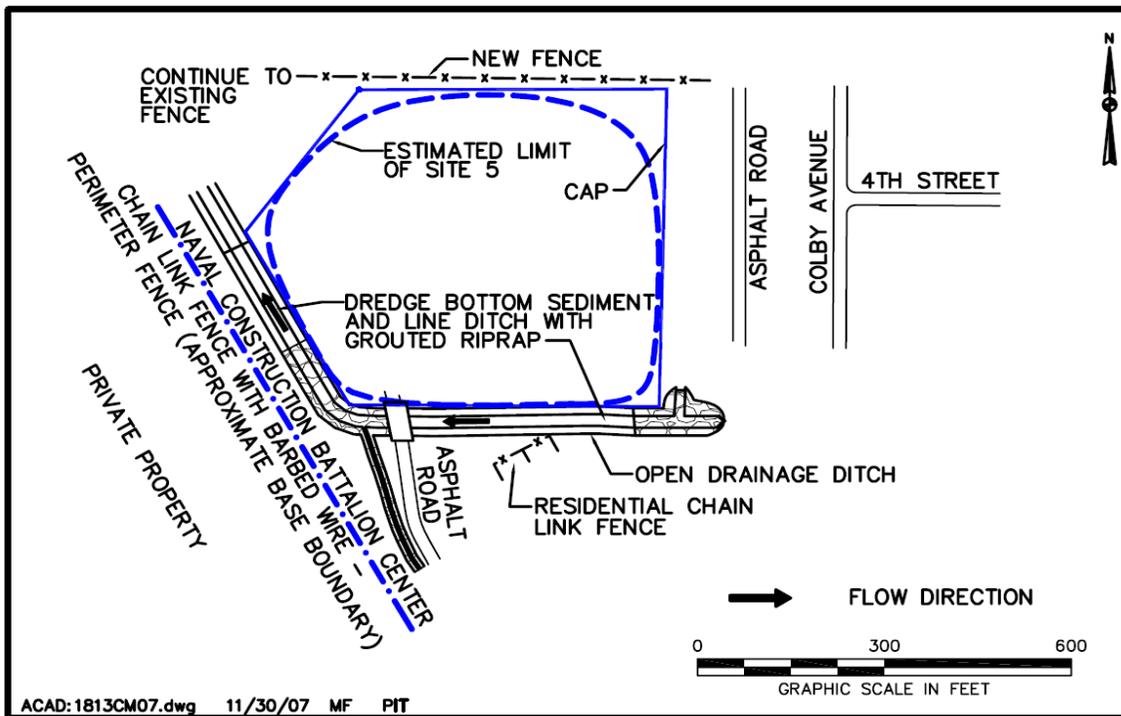


Figure 2 - The presumptive remedy for Site 5 includes covering the landfill and lining the ditches.

PREFERRED ALTERNATIVE

The Preferred Alternative for cleaning up Site 5 is Alternative 2: Cap, Ditch Lining, Land Use Controls, and Monitoring. This alternative is a USEPA presumptive remedy for a landfill. After the remedy is implemented, the site will be available for recreational uses. Based on the information currently available, the Navy

believes that the Preferred Alternative meets the threshold criteria and provides for the best balance of tradeoffs with respect to the balancing and modifying criteria (See the “Nine Evaluation Criteria” highlight box on page 6). The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA Section 121(b): (1) be protective of human health and the environment; (2) comply with ARARs; (3) be cost effective; and (4) utilize permanent solutions to the maximum extent practical. However, because the waste is left in place and covered under the presumptive remedy, the preference for treatment as a principal element is not satisfied.

Note that the Navy, in conjunction with the USEPA and MDEQ, will not select a final alternative until public comments have been considered.

Alternative 2 would be expected to achieve Remedial Action Objectives immediately upon completion of all remedial actions.

Implementability

Alternative 1 would be extremely simple to implement because no action would occur.

Alternative 2 would be somewhat harder to implement although resources, equipment, and materials are readily available to perform the excavation, covering, groundwater monitoring, landfill gas management, and transportation activities. Land use controls would be developed by the Navy with concurrence by MDEQ and USEPA.

Cost

The capital and operation and maintenance costs and net present worth of the remedial alternatives were estimated as shown on the table at right.

The costs have been rounded to the nearest \$1,000 to reflect the preliminary nature of these estimates.

Alternative	Capital Cost	Net Present Worth with Long-Term Monitoring
1	\$0	\$0
2	\$3,722,000	\$4,487,000

COMMUNITY PARTICIPATION

The public is encouraged to participate in the decision-making process for the cleanup of Site 5 by reviewing and commenting on this Proposed Plan during the Public Comment Period.

Additional information on this site can be found in the **Remedial Investigation and Feasibility Study** at Site 5 – Heavy Equipment Training Area Landfill at Naval

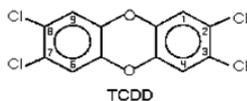
Construction Battalion Center and other Site 5 documents. These documents are available at the NCBC Gulfport Information Repository.

The date, location, and time of the public meeting, as well as the dates for the Public Comment Period and the location of the Administrative Record files, are provided on the first page of this Proposed Plan.

Chemicals of Concern at Site 5

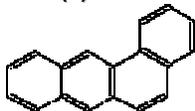
The **chemicals of concern** are the contaminants at a site that are present in concentrations determined by the human health and/or ecological risk assessment to require further study and/or cleanup. For Site 5, **chemicals of concern** include:

Dioxins



“**Dioxins**” is a term used to describe a single chemical or group of chemicals known as polychlorinated dibenzodioxins. One of these compounds, 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD), is the **dioxin** found in **HO**. Known to be a human carcinogen, **dioxins** are formed as an unintentional by-product of many industrial processes involving chlorine, such as waste incineration, chemical and pesticide manufacturing, and pulp and paper bleaching. Other **dioxin** compounds, such as **octachlorodibenzo-p-dioxin (OCDD)** and **heptachlorodibenzo-p-dioxin (HpCDD)**, have also been detected at the site but are not associated with **HO**.

Benzo(a)anthracene



Benzo(a)anthracene is a high-molecular-weight, four-ring polycyclic aromatic hydrocarbon (PAH), a USEPA Priority Pollutant and a probable human carcinogen. Because it is formed when gasoline, garbage, or any animal or plant material burns, it is usually found in smoke and soot. This chemical combines with dust particles in the air and is carried into water and soil.

Arsenic

Arsenic is a naturally occurring element widely distributed in the earth’s crust. The Department of Health and Human Services (DHHS) and USEPA have determined that inorganic arsenic is a known human carcinogen.

Glossary

Applicable or Relevant and Appropriate Requirements (ARARs): The federal, state, and local environmental rules, regulations, and criteria that must be met by the selected remedy under **CERCLA**.

Chemical of Concern: A substance detected at a concentration and/or in a location where it could have an adverse effect on human health and the environment.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A federal law also known as “Superfund”. This law was passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. This law created a special tax that goes into a trust und to investigate and cleanup abandoned or uncontrolled hazardous waste sites.

Dioxin: A class of organic compounds composed of two benzene rings connected by two oxygen atoms, typically with one or more chlorine atoms attached to each benzene ring.

Ecological Risk Assessment: A study that evaluates the potential risk to ecological receptors (various types of plants and animals) from contaminants at a site.

Feasibility Study: A report that presents the development, analysis, and comparison of cleanup alternatives.

Furan: A class of organic compounds containing a ring of four carbon atoms and one oxygen atom.

Heptachlorodibenzo-p-dioxin (HpCDD): A dioxin compound.

Herbicide Orange (HO): An herbicide blend of 2,4-dichlorophenoxyacetic acid (2,4-D) and 2,4,5-trichlorophenoxyacetic acid (2,4,5-T) used by the U.S. military in Vietnam.

Human Health Risk Assessment: A study that evaluates the potential risk to human receptors (such as site workers and residents) from contaminants at a site.

Land use controls: Engineered and non-engineered measures formulated and enforced to regulate current

and future land use options. Engineered measures include fencing and posting. Non-engineered measures typically consist of administrative deed restrictions that prohibit residential development and/or groundwater use.

Net Present Worth: A costing technique that expresses the total of initial capital cost and long-term operation and maintenance costs in terms of present day dollars

Octachlorodibenzo-p-dioxin (OCDD): A dioxin compound.

Operation and Maintenance: Activities conducted after a site action is completed to ensure that the action is effective.

Preferred Alternative: The remedy recommended by the Navy for cleaning up a site. The remedy may be modified or changed based on comments received during the Public Comment Period.

Presumptive remedy: A standardized, proven technology to clean up a type of site, such as a municipal landfill. Presumptive remedies have been shown to ensure consistency in remedy selection and reduce the cost and time required for investigations and remediation of similar types of sites.

Remedial Action Objectives: A cleanup objective agreed upon by the Navy, USEPA, and MDEQ. One or more Remedial Action Objectives are typically formulated for each environmental site.

Remedial Investigation (RI): A report that describes the site, documents the type and distribution of environmental contaminants detected, and presents the results of the risk assessment.

Sediment: Soil deposited in **surface water** bodies such as ditches, streams, or lakes.

Soil gas: Air that is present in the void spaces of the soil above the groundwater table.

Surface water: Water bodies that are on land surface such as lakes, river, streams, and ditches.

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