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NCBC GULFPORT
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LETTER AND COMMENTS FROM MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL
QUALITY REGARDING FEASIBILITY STUDY SITE 5 NCBC GULFPORT MS
5/7/2008
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

7 May 2008

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

Re: Feasibility Study for Site 5 - Heavy Equipment Training Area, Naval Construction Battalion Center Gulfport, Mississippi, November 2007.

The Mississippi Office of Pollution Control has reviewed the above referenced document and offers the following comments.

1. Detailed analyses of remedial technologies were not provided for alternatives retained (Table 3-1) in the preliminary screening presented in Section 3.0 (beginning on page 3-1). The section entitled Assembly and Detailed Analysis of Remedial Alternatives (Section 4.0 beginning on page 4-1) contained definitions of the nine general evaluation criteria but only two alternatives were evaluated in the Detailed Analysis of Remedial Alternatives (Section 4.3, page 4-6). Cost analyses were not provided for any of the alternatives prior to or after retention of alternatives except for the chosen remedy. The screening process used for eliminating the alternatives retained (Table 3-1) for evaluation does not appear in the document.
2. The text (ex. page ES-3, paragraph 2, page 1-8, paragraph 3) refers to the primary remediation goal/TRG value (MCL) for arsenic as 50 ppb. The MCL for arsenic is 10.0 ppb. This became effective in 2006.
3. A plan view map should be supplied showing locations of wells and labeled lines of section for the stratigraphic cross sections given as figures 1-3 and 1-4.
4. The text (ex page 1-8, paragraph 5) tends to shy away from reporting actual concentrations (or percentages comprising the TEQ value) of 2,3,7,8 TCDD in soils and provides discussions indicating that observed concentrations fall below some minimal

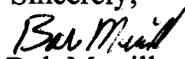
OFFICE OF POLLUTION CONTROL

amount or percentage of TCDD required for indication that Herbicide Orange (HO) is the contaminant.

No minimal amount, concentration or percentage of 2,3,7,8 TCDD has been established for fingerprinting Herbicide Orange. Any amount of TCDD detected in any media is adequate for establishing HO as a potential contaminant. These discussions should be removed and the concentration ranges of TCDD should be provided for each media as reported for the other contaminants addressed in the document.

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

Sincerely,


Bob Merrill

cc. Bart Reedy, USEPA