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NCBC GULFPORT
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LETTER AND COMMENTS REGARDING DRAFT LANDFILL COVER ASSESSMENT SITE 3
NCBC GULFPORT MS
4/14/2009
TETRA TECH NUS



DEPARTMENT OF THE NAVY
Naval Facilities Engineering Command Southeast
Jacksonville, FL 32212-0030

April 14, 2009

Yarissa Martinez
Task Order Manager
Tetra Tech NUS
Tallahassee, FL 32308

RE: Draft Landfill Cover Assessment for Site 3, NCBC Gulfport, MS

I have reviewed the report and have the following comments.

1. Rationale for Assessment. The Presumptive Remedy Guidance states that, "in the absence of Federal Closure Guidelines, State Subtitle D closure requirements have generally applied..." MDEQ has noted that a vertical hydraulic conductivity cover of 1 E -5 cm/sec is the minimum acceptable cover for unregulated landfills with unknown liners.
2. Rationale for Assessment. Please note that the cover performs two functions: (1) to prevent direct contact with landfill contents, and (2) to minimize infiltration/leaching of potential contaminants to groundwater. Please also note that the contents (disposal cells) are repeatedly below groundwater during the frequent wet periods. Therefore, lowering the vertical hydraulic conductivity of the cover will not significantly alter the generation or movement of leachate/contaminants in the shallow aquifer and could result in the unwanted capture and movement of landfill gases. I recommend that surface soil amendments or fill material not greatly exceed state requirements.
3. General Comment. Please add a brief section on "Data Sources/Field Methods." Please also include the soil descriptions from a representative number of borings across the site conducted during the RI. Ten to fifteen locations would give a better picture of the vertical and horizontal extent of the existing cover.
4. Existing Cover Assessment. Discuss the current cover in terms of thickness and extent using boring data from the RI. As stated above, 10 to 15 locations would be enough. Discuss the depth to the disposal cells and their relation to seasonal groundwater fluctuations.
5. Existing Cover Assessment. Please add descriptive boring locations to site figure.

6. Conclusions and Recommendations. Please note that the current cover already meets one of the presumptive remedy cover requirements: preventing direct exposure to landfill contents.
7. Conclusions and Recommendations. Add a recommendation for identifying and testing a source material in the remedial design process to ensure acceptance of the final cover.

Sincerely,

A handwritten signature in black ink, appearing to read "RFisher". The signature is written in a cursive, flowing style.

Robert Fisher, P.G.
Task Order Manager

cc. Bob Merrill
Helen Lockard
Gordon Crane