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LETTER AND RESPONSE TO COMMENTS FROM U S NAVY REGARDING SUPPLEMENTAL
OFF SITE RESPONSE LETTER 2 DECEMBER 2008 NCBC GULFPORT MS
4/29/2009
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

April 29, 2009

Mr. Robert Darby, P.E.
Head, Environmental Restoration Branch
Department of the Navy
Naval Facilities Engineering Command Southeast
Jacksonville, Florida 32212-0030

RE: NCBC Gulfport Supplemental Off-Site Response Letter of December 2, 2008

Dear Mr. Darby:

Mississippi Department of Environmental Quality (MDEQ) staff has expended a great deal of time and effort discussing and evaluating the Navy's response to MDEQ's letter addressed to Mr. Art Conrad and dated August 29, 2008. The following are our comments and concerns:

1. Navy Response to Comments 1, 2, 4(AOC-2), 5(AOC-3), 6(AOC-4), 7(AOC-5), 8(AOC-1), and 10 –

The staff agrees with your response.

2. Navy Response to Comment 3, AOC-1 - Investigate buried drums.

The staff does not agree with your response and will elevate the question of further investigation of the alleged buried drums to upper management for resolution.

3. Navy Response to Comment 9 – Long Term Monitoring on Canal 1 and Turkey Creek

MDEQ's request for long term monitoring of Canal 1 and Turkey Creek has nothing to do with "private landfill monitoring". This request is in regard to assuring that we do not have migration of contaminants from Area C and other IRP sites where investigations are ongoing and contaminants may have been missed during previous investigations. While we believe that the investigations to date have been

thorough, there is no way to be certain that we have not missed something or that contaminants are migrating from existing IRP sites that are currently under investigation. As previously stated, the Navy may monitor under the IRP program while sites are active and MDEQ expects long term monitoring to be a part of final site closure.

4. Navy Response to Comment – Filtering samples

We understand the Navy's response. We are simply suggesting that running both a filtered and an unfiltered sample could provide the Navy with valuable information on whether the dioxin in the groundwater sample is dissolved or suspended in the groundwater.

5. Navy Response to Comment – Sample Mr. Simmons and Mrs. Hansen's mothers wells.

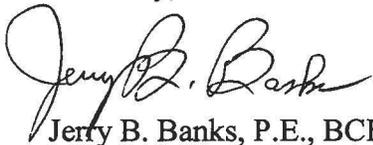
We concur and will provide assistance as needed.

6. Navy Response to Comment - Analysis of constituents other than dioxins.

We concur. We will need to coordinate with the Navy and get sample containers for the sampling event so please give MDEQ advance notice.

MDEQ will continue to work with the Navy to resolve issues that arise related to the storage of the agent orange and IRP sites that have been investigated at the base in order to assure the continued protection of public health and the environment. If you have further questions please feel free to call me at 601-961-5221 or Phillip Weathersby at 601-961-5302.

Sincerely,



Jerry B. Banks, P.E., BCEE

Chief, Groundwater Assessment & Remediation Division

cc: Gordon Crane