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NCBC GULFPORT
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON OFFSITE AND
ONSITE DELINEATION WORK PLAN FOR SITE 8 NCBC GULFPORT MS
6/17/1996
MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

June 17, 1996

CERTIFIED MAIL NO. Z 732 424 528

Department of the Navy
Naval Construction Battalion Center
5200 CBC 2nd Street
Gulfport, Mississippi 39501-5001
Attn: F. P. DiGeorge, III
Captain, Civil Engineer Corps

Re: Offsite Delineation Workplan
Site 8, Former Herbicide Orange
Storage Areas
Onsite Delineation Workplan
Site 8, Former Herbicide Orange
Storage Areas
Interim Corrective Measures
Workplan Site 8, Former Herbicide
Orange Storage Areas

Dear Captain DiGeorge,

The Department of Environmental Quality has completed its intinal review of the above referenced documents. Please review the following lists of comments generated by this agency and submit revised workplans that include additional information, clarification, and revisions as required.

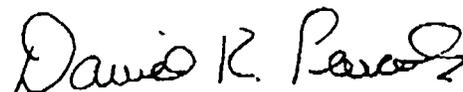
Comment 1: In Chapter 1 of the workplans reference is made to the Toxicity Equivalency Quotients (TEQs) for dioxin and furan congeners. Please clarify the procedure used to calculate the TEQs, with particular attention to current EPA protocol.

Comment 2: Chapter 2 of the Onsite and Offsite Delineation Workplans describes how Total Organic Carbon (TOC) will be used as an indicator for likely areas of dioxin deposition. Please include a procedure which will provide verification of the assumption, e.g. a certain number of low TOC samples should be analyzed for dioxin.

- Comment 3: It is this agency's opinion that the Onsite and Offsite Delineation Workplans do not adequately address potential contamination on the southern perimeter of the base. Please add sampling activities to the workplans to fully address any potential pathways on the south side of the base.
- Comment 4: It is not clear that the samples to be collected at the locations shown in Figure 3-1 of the Offsite Delineation Workplan will fully address the possible mechanisms of dioxin deposition at each sample location. Will samples be collected from different points (base, sidewall, overflow or floodplain) at each sample location? Please clarify.
- Comment 5: Section 4.1.1 of the Interim Corrective Measures Workplan discusses widening of the drainage ditches upstream of the SRT. Please discuss the quantity and handling procedures for the material generated by the widening project.
- Comment 6: Section 4.1.1 of the Interim Corrective Measures Workplan discusses monitoring of the SRT network. Please provide additional details that include a schedule for inspecting the SRT's and the disposition of any sediment recovered from the traps.
- Comment 7: Section 4.2 of the Interim Corrective Measures Workplan discusses the potential capping of the ash piles. Will it be necessary to move ash outside the boundary of the present ash pile(s) in order to construct the cover? What procedures would be followed to minimize dust emissions during construction activities?

If you have any questions regarding the above comments, we will be available for meetings or telephone consultation as needed. Please submit a written response to the comments on the workplans along with any additions or revisions to the workplans within sixty (60) days of receipt of this letter.

Sincerely,



David K. Peacock
Hazardous Waste Division