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NCBC GULFPORT
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON PERFORMANCE
SPECIFICATION AT SITE 6 NCBC GULFPORT MS
1/30/1995
MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

39501-IRP
18.01.06.0006



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

January 30, 1995

Mr. Gordon Crane, Code 17
Environmental Coordinator
Naval Construction Battalion Center
5200 CBC 2nd St.
Gulfport, Ms. 39501

RE: Performance Specification Site 6, Fire-Fighting Training Area

Dear Mr Crane:

The Mississippi Office of Pollution Control has reviewed the reference document and approves the design method for the removal of Free Phase Product. However, there are several points of concern that this office feels should be identified for the record.

- 1.) The groundwater model (Flowpath) utilized in the design for product removal was executed with the assumption that the "clay" bed forms the base of the surficial aquifer. The assumption of a thin unconfined surficial aquifer results in increased drawdown with a given pumping rate as compared to a hydraulically connected thick sequence of sands that may actually be more representative of the sediments below the site. Has any consideration been given to this possibility and how it may effect the efficiency of the system?
- 2.) This model predicts groundwater flow characteristics, not those of the more viscous product under consideration. Have the flow characteristics of the free product been considered in the model and how they might effect the rate of product removal?

The above concerns are irrelevant to the general plan, because the success of the project will be based on observed rather than predicted or assumed conditions. However, the decreased flow rate combined with overestimated drawdown could result in unanticipated

problems once pumping begins, such as larger volumes of groundwater for disposal and less free product recovery per given time. Flow rates could be slower than predicted by the model, and the predicted hydraulic gradient may be more difficult to maintain under equilibrium conditions if aquifer thickness greatly exceeds the modeled thickness of about 35 feet.

It is the understanding of the MS OPC that all available monitor wells and piezometers will be utilized to monitor water levels, product levels, and product thickness, and that decisions regarding system effectiveness will be discussed with MS DEQ.

Sincerely,

A handwritten signature in cursive script that reads "Phillip Weathersby".

Phillip Weathersby
CERCLA Section