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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FEASIBILITY  
STUDY FOR SITE 3 NCBC GULFPORT MS  
9/3/2010  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY



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

3 September 2010

Robert Fisher  
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PO Box 30, Bldg 903  
NAS Jacksonville, FL 32212-0030

Re: feasibility Study for Site 3 - Northwest Landfill, Naval Construction Battalion Center  
Gulfport, Mississippi, Draft, June 2010.

The Mississippi Office of Pollution Control (OPC) has reviewed the above referenced document. The following concerns were noted during document review.

1. The text (page 1-13, paragraph 4) reports an "arsenic plume" that was detected in nine groundwater monitoring wells in the southern part of the site but dismisses the occurrences as not related to waste disposal activities. Elevated arsenic concentrations also occurred in surface and subsurface soil samples as reported on page 1-12 (paragraph 4) and in down gradient surface water and sediment samples (page 1-14, paragraph 2). OPC does not necessarily concur that arsenic occurrences in soil and groundwater at Site 3 are not attributable to the site since subsurface soil, surface soil, groundwater and surface water occurrences were reported at concentrations above screening levels. If arsenic is not attributed to Site 3 then the alternate source of the "arsenic plume" (described on page 1-13, paragraph 4) should be identified. Surface water and sediments that were not retained as mediums of concern but had contaminants occurring at concentrations exceeding screening levels should either be retained or evaluated and remediated separately as discussed in comment 13 of the comment letter for the Remedial Investigation dated 26 August 2010.
2. The response to comments for the cover material thickness study is included in the document. Apparently the point concerning the maximum allowable vertical hydraulic conductivity ( $1 \text{ E } -5 \text{ cm/sec}$ ) for the aquitard cover material has not been affirmed, except to say that it should not be "greatly exceeded" (Appendix C, Navy comment response 2). Again, the vertical hydraulic conductivity should not exceed (by any amount)  $1 \text{ E } -5 \text{ cm/sec}$ . In order to achieve this it will be necessary to have a target range of  $1 \text{ to } 9 \text{ E } -6 \text{ cm/sec}$ .

3. A detailed Long Term Groundwater Monitoring Plan that will complement the brief discussion presented on pages 4-11 (last paragraph) and 4-12 should be submitted as a separate document.

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

Sincerely,

*Bob Merrill*

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