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LETTER TRANSMITTING EPA REGION IV RESPONSES TO U S NAVY REQUEST FOR
REVISION TO AMBIENT AT MONITORING PLAN NCBC GULFPORT MS
3/3/1988
U S EPA REGION IV



MAR 03 1988

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4WD-RCRA

Terry L. Stoddart, Major
USAF, BSC
Department of the Air Force
HQ AFESC/RDVW
Tyndall AFB, Florida 32403

RE: Ambient Air Monitoring Plan Revision Request
Naval Construction Battalion Center, Gulfport, Mississippi
EPA I.D. NO. MS2 170 022 626

Dear Major Stoddart:

This is in response to your February 16, 1988, request for revision to the ambient air monitoring plan for the above referenced facility. Specifically, you have requested the following:

1. Discontinue the use of the "B" station samplers. No useful data has been gained from this station nor is any anticipated. It is also the most difficult to keep in position due to its close proximity to the excavation area. Relocation often requires suitup in tyvex and equipment decontamination because the location is on contaminated soil.
2. Operate the samplers only during the excavation periods. The sample would then include as many as four excavation periods to make up the desired 24-hour sampling period. The present operation includes approximately 16 hours of data collection during non excavation periods to achieve the 24-hour throughput required to assure an adequate sample. This change will assure that a positive detection of 2,3,7,8 TCDD occurred during a period of excavation and would remove the dilution that currently occurs during non excavation periods.
3. Discontinue the use of HV samplers as they do not contribute to the control of the excavation operation in real time. No correlation of 2,3,7,8 TCDD migration and HV data is possible.
4. Change the analysis frequency of the "E" (QA) sampler to 10% of the "C" sampler. The current frequency is stated at two times a week which is excessive during weeks when excavation periods occur only two or three times a week.

Our response is as follows:

1. As explained in the revised monitoring plan, the "B" station sampler was discontinued during the initial 30-day excavation period because of close proximity to the excavation equipment which resulted in

overload of the sampler with diesel particulate. The sampler could not be analyzed for TCDD because of interference from the particulate. For this reason, the "B" samplers may be deleted as requested.

2. Continuous sampling was conducted during the first 30 days of excavation to determine baseline TCDD migration levels. Monitoring results indicate no migration above the recommended action level of 3 pg/m³, therefore, the sampling frequency may be changed as requested.
3. The HV samplers were used in the original plan to determine if there is correlation between particulate level and TCDD migration. Monitoring results indicate no migration of TCDD above the recommended level, therefore correlation of TCDD and particulate level is inconclusive. The HV samplers may be discontinued as requested.
4. The analysis frequency of the QA sampler may be changed to 10% of the "C" sampler as requested.

In addition, pages 17 and 19 of the revised plan should be changed to state that excavation will stop and EPA notified if sampler "C" exceeds the recommended action level. This procedure is correctly identified on page 27 of the revised plan. The plan should also be revised to indicate that EPA will be notified immediately when analytical detection levels are not low enough to verify compliance with the action level for TCDD concentration.

Finally, as discussed with Dan Haley on March 2, 1988, the discrepancy in the number of samples from the QA sampler should be explained. The summary states that 2 samples/week were taken. Approximately 4 weeks of sampling were conducted, however, only 4 samples were reported.

If there are questions concerning any of the above, please contact Ms. Caron Falconer of my staff at (404)347-3433.

Sincerely yours,



Patrick M. Tobin
Director
Waste Management Division

cc: Sam Mabry, Mississippi Department of Natural Resources