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NCBC GULFPORT
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LETTER REGARDING AMENDMENT TO THE FINAL ENVIRONMENTAL STATEMENT
CONCERNING THE DISPOSITION OF ORANGE HERBICIDE NCBC GULFPORT MS
3/22/1977
U S AIR FORCE

DEPARTMENT OF THE AIR FORCE
WASHINGTON 20330

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OFFICE OF THE ASSISTANT SECRETARY

March 22, 1977

Dear Capt Taylor

On October 12, 1976, the Air Force filed an Amendment to the Final Environmental Statement (FES) concerning the disposition of Orange Herbicide. In that Amendment we proposed to reprocess the herbicide via charcoal adsorption to remove the dioxin contaminant so that the herbicide would meet registration and use requirements of the Environmental Protection Agency (EPA). The Amendment further indicated that, should this reprocessing not be feasible, the herbicide would be destroyed by incineration as proposed in our FES of November 1974. Both our own studies and the comments we received on the Amendment FES make it clear that, based on present knowledge, reprocessing is not an acceptable solution.

From a demonstrated chemical engineering point of view, charcoal adsorption can remove the dioxin from Orange Herbicide to the required levels. However, the residue of that process, dioxin-laden charcoal, presents a disposal problem at least as difficult as the Orange Herbicide itself. Earlier expectations of short term charcoal storage and readily available charcoal disposal techniques turned out to have been optimistic. In fact, demonstrated charcoal destruction technology does not exist for this particular waste and the cost and time frame for developing it are speculative at best.

We appreciate the comments on the amended FES. The 1974 Final EIS on ocean incineration remains valid. Since we have concluded not to adopt this reprocessing proposal and the discussion in the 1974 FES is still valid, no additional amendments to our FES are needed.

On March 9, 1977, the EPA was requested to convene a final public meeting on our ocean incineration permit application. A Federal Register notice is expected by next week to give the time and place of this meeting to be held in Washington, D.C. Should the permit be granted, we hope to contract for the immediate use of the M/V Vulcanus and complete the herbicide's incineration by early fall.

A handwritten signature in black ink, appearing to read "L. K. Mosemann II", is located below the main body of text.

L. K. MOSEMANN II
Deputy Assistant Secretary
(Logistics)

Capt James Taylor, Cmdr, NCBC
Code 12.1, Gulfport, MS 39501