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NCBC GULFPORT
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LETTER FROM U S AIR FORCE REGARDING REQUEST TO BURY WASTE MATERIAL
FROM HERBICIDE ORANGE STORAGE SITE NCBC GULFPORT MS
8/1/1977
U S AIR FORCE

1 AUG 1977

LO /WALLBAUM/29 JUL 77/JW MI/MC 2506/FILE:

Landfill Disposal of Waste Material From Herbicide Storage Site

**Mr. Jerry Hlass, Manager
NSTL Station MS 39525**

1. In June 1977, the USAF successfully completed the removal of 843,000 gallons of surplus Herbicide Orange, a 50:50 mixture of 2,4-dichlorophenoxy-acetic acid (2,4-D) and 2,4,5-trichlorophenoxyacetic acid (2,4,5-T) from open storage at the Naval Construction Battalion Center (NCBC), Gulfport MS. Immediately after the removal of the herbicide, USAF and US Navy personnel began reclamation of the storage site. This action has resulted in the accumulation of about 320 cubic yards of waste materials generated during storage and removal operations. The bulk of this material (over 85%) is weathered wooden frames used for storage racks for the 15,350, 55-gallon drums of herbicide. The detailed composition of the waste material is as follows:

<u>CUBIC YARDS</u>	<u>DESCRIPTION</u>
290	Wooden support racks
14	Connex metal containers holding herbicide soiled clothing (3 CONNEX CONTAINERS)
13	Bentonite clay (oil sorb packed in 20 and 55-gallon metal snap-ring drums)
9	Petroleum-based sludge (heavy liquid in 55-gallon steel drums) (75 DRUMS)
6	Assorted metal scrap and rubber tubing
TOTAL	
332 +	

LANDFILL

2. All of the waste material may have been contaminated to varying degrees with the herbicide and the chemical 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD). Replicated analyses of the herbicide impregnated oil sorb and the petroleum-based sludge indicated concentration of TCDD of 50 and 62 parts per billion, respectively. This would equate roughly to a total of approximately one millionth of one gram of TCDD in the bentonite clay and sludge. Only 10% of the wooden storage racks have visible signs of herbicide stains. All of this wood had been treated previously with a wood preservative and analysis for TCDD was not possible.

3. Continued open storage of these waste materials at NCBC is not acceptable because of the high wind hazard along the Gulf Coast and the costs involved in preventing wind movement of this waste. Burning is not acceptable since herbicides (2,4-D and 2,4,5-T) will volatilize at open fire temperatures producing vapors that damage most garden crops (tomatoes, beans, etc.), as well as, ornamental shrubs and other broadleaf plants. Salvage or any form of reuse of these materials is not advisable due to the presence of TCDD, even though TCDD is present at a very low level. The only acceptable method of disposal is burial in an approved landfill.

4. Request your approval for the burial of approximately 332 cubic yards of waste material at the NSTL landfill. X

JACK W. WATERS
Brigadier General, USAF
DCS/Logistics Operations

1 Atch
EPA Region IV Ltr,
21 July 1977

COORDINATION

SYMBOL	NAME	DATE
LDSM	Wallace	29 July 77