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NCBC GULFPORT  
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LETTER REGARDING THE SUMMARIZATION OF MEETING MINUTES 18 OCTOBER 1088  
REGARDING SITE CLOSURE NCBC GULFPORT MS  
10/27/1988  
NCBC GULFPORT

27 OCT 1988

MEMORANDUM FOR THE FILE

From: Code 470.2  
To: 5090/5A File  
Via: Code 470

Subj: MEETING WITH STATE OF MISSISSIPPI AND REGION IV EPA OFFICIALS TO  
DISCUSS SITE CLOSURE UNDER CERCLA PROGRAM

Encl: (1) List of attendees at State of Mississippi meeting  
(2) List of attendees at Region IV EPA meeting  
(3) Background paper for Herbicide Orange site presented to State  
and Region IV personnel

1. On 18 October 1988 at 0900, a meeting was held with the State of Mississippi officials and on 19 October 1988 at 0900, a meeting was held with Region IV EPA officials in Atlanta, GA. The subject of both meetings was the final disposition of the former Herbicide Orange storage area at CBC Gulfport. Enclosure (1) is a list of attendees at the State meeting, enclosure (2) is a list of attendees at the Region IV meeting and enclosure (3) was presented to both State and Region IV officials during the meeting.

2. The concept of addressing the site under the CERCLA program versus the RCRA program was discussed at each meeting. Discussion items included the drafting of a decision paper documenting the incinerator project and how the actions involved fit into the installation restoration (IR) process. The IR actions involved include:

- a. Preliminary assessment/site inspection
- b. Site characterization
- c. Remedial investigation/feasability study
- d. Remedial action taken

The State and Region IV were told that the decision document will summarize these steps and will show the former Herbicide Orange storage area is no longer a threat to the health, welfare and environment and can be returned to full and beneficial use by the Navy.

3. The State and Region IV both asked about future land use for the site. They were told the site was planned for heavy industrial uses such as warehouse or open storage but that no construction would take place until a clean bill of health was obtained on the site.

4. We asked for and received State and Region IV concurrence on addressing the site using the CERCLA program and procedures. EG&G will prepare an updated outline and POA&M for the project for submittal to the State and Region IV, with our review and approval of course.



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10/18/88

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ENCL (2)

NAVAL CONSTRUCTION BATTALION CENTER  
HERBICIDE ORANGE CONTAMINATED SITE  
REMEDIATION STRATEGY AND STATUS REPORT

Sponsored by

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

Presented to

US ENVIRONMENTAL PROTECTION AGENCY, REGION IV  
and  
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

October 19, 1988

ENCLOS(3)

## **NCBC HO CONTAMINATED SITE REMEDICATION STRATEGY AND STATUS REPORT**

### **Purpose**

This paper identifies the major activities associated with completion of the Naval Construction Battalion Center (NCBC) Herbicide Orange (HO) site remediation. The intent of this review is to ensure that concerned parties have a common awareness of these planned activities and future projected use of the remediated site such that project completion and land disposition can proceed in an orderly and environmentally acceptable manner.

### **Background**

Herbicide Orange, a defoliant used by the United States armed forces in southeast Asia during the Vietnam war, was stored at the NCBC in Gulfport, Mississippi until 1977. As a result of leaks and spills during storage, some of the soil at the site became contaminated with Herbicide Orange and 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD), an unwanted by-product found in HO.

In 1980, the Air Force Surgeon General proposed a research protocol to return HO contaminated sites to full and beneficial use. In 1978, the Air Force began characterizing the former HO storage site and investigating various methods to cost effectively remediate HO contaminated sites. In July 1985, the Navy formally placed the former HO storage area on the Naval Installation Restoration Program list of former hazardous waste disposal sites (site number 8).

Based on the results of laboratory tests and pilot scale studies at the former HO storage site, the Air Force decided to undertake a full scale demonstration program using high temperature incineration for treatment of HO contaminated soils. A rotary kiln incinerator was mobilized on site in the autumn of 1986 followed by two test burns, one in December 1986 and a trial burn in May, 1987 that demonstrated 99.9999% destruction and removal efficiency. A Research Development and Demonstration (RD&D) operating permit was granted by EPA Region IV on November 25, 1987. Routine operations began two days later and will be completed by late November, 1988.

### **Site Remediation Goal**

The NCBC site remediation meets the Air Force and Navy objectives of returning the HO contaminated site to full and beneficial use through the Installation Restoration Program. Towards that end, a clean-up standard of 1.0 ppb dioxin was selected for this site. This level is consistent with the Centers for Disease Control dioxin risk assessment that identified 1.0 ppb dioxin in soil as an action level for residential areas and is significantly more conservative than the EPA target clean-up level of 20 ppb for contaminated nonresidential sites in Missouri.

### **Success of Site Remediation**

All plots whose surface concentration exceeded 1.0 ppb of 2,3,7,8-TCDD will be excavated and processed in the incinerator. Each 20 ft by 20 ft plot will be excavated until sampling and analysis shows that the bottom of the hole is less than 1.0 ppb of 2,3,7,8 TCDD. To date 930 plots of the available 959 contaminated plots have been processed. The remaining contaminated plots will be processed by late November, 1988. The 1,335 uncontaminated plots (less than 1.0 ppb 2,3,7,8-TCDD) will not be excavated.

The ash residue resulting from incineration of soils is currently being stockpiled on site in accordance with the RD&D permit conditions. To date, monthly comprehensive analysis shows that all valid samples were free of 2,3,7,8-TCDD with detection limits in the low part per trillion range. A delisting petition has been written and will be submitted to the EPA Office of Solid Waste in early November, 1988. Based upon previous successful EPA delisting petitions and the cleanliness of the NCBC incinerator ash, we anticipate successful delisting.

### **Remaining Activities**

As a consequence of the Air Force efforts, all soil contaminated at IRP site #8 will be remediated. The Navy, with support from the Air Force, will proceed with IRP documentation of the investigation and remedial action taken to date. That documentation will be consistent with the National Contingency Plan.

Additionally, the Air Force and Navy will jointly write a decision document consistent with the Navy's Installation Restoration Program. That document will demonstrate site cleanliness and demonstrate that no additional remedial action at the former H0 storage site is necessary.

### **Proposed Future Land Use**

Upon agreement with a decision document which demonstrates that the area is no longer a threat to the public health and welfare or the environment, the Navy will proceed with a military construction project for construction of a warehouse and an open storage area for heavy equipment. Such use is consistent with the original objective of returning the site to full and beneficial use.