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LETTER REGARDING SUMMARY OF MEETING WITH U S EPA REGARDING STATUS
REPORT AND BUDGET NCBC GULFPORT MS
12/4/1989
IDAHO NATIONAL ENGINEERING LABORATORY



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December 4, 1989

DEC 29 1989

Mr. J. J. Short
HQ AF/LEEVO
Bolling Air Force Base
Washington, D. C. 20332-5000

SUMMARY OF MEETING WITH EPA REGION IV AND BUDGET/STATUS REPORT -
DJH-29-89

Dear Mr. Short:

On November 9, representatives from AF/LEEVO, its subcontractors, NCBC, and Naval Facilities Southern Division met with the Mr. James Scarborough of EPA Region IV and his staff to discuss the disposition of the processed soil at NCBC. The attendance list is provided as Attachment 1.

During the meeting, Mr. Scarborough stated that EPA/OSW is forced to deny delisting of the processed soil. The reasons stated were that the positive TCDD equivalent detections were greater than the sample specific Practical Quantitation Limit (PQL). The delisting petition assumed a PQL of 15 ppt; anything detected below 15 ppt was assumed to be below the limits of practical quantitation and equivalent to a nondetectable result. Therefore, the extremely high resolution analytical results did not support the petition's contention that no TCDD equivalent was present in the processed soil.

As a result, EPA/OSW placed the burden of processed soil disposition in the hands of EPA Region IV. Additionally, EPA/OSW suggested that we withdraw the petition. After obvious, careful consideration, EPA Region IV suggested the following course of action:

- Withdraw the delisting petition.
- Revise the ground water model in the Decision Document to include the processed soil into the TCDD source term.
- Submit the revised Decision Document to Mississippi Department of Natural Resources (MDNR).

If the risk model shows a combined risk of less than 1×10^{-6} , MDNR has indicated that they would be very likely to approve closure of the site, which would then allow the Navy to build warehouses and equipment storage areas on the remediated site. Both the Air Force and the Navy tentatively agreed to this course of action pending concurrence with their respective chains of command.

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As you and I discussed last week, we should send a letter to EPA Region IV that paraphrases the course of action verbally agreed upon between EPA Region IV and the Air Force. A draft letter is provided as Attachment II. Per our discussion, the attached letter would also transmit a draft copy of the Full Scale Demonstration Project technical reports. Transmittal of those reports would fulfill one of the RCRA RD&D permit requirements. I must emphasize, however, that we are awaiting comments from AF/RDVW and thus the technical reports are still considered a draft.

On November 21, 1989, I called Mr. Sam Mabry of the Mississippi Department of Natural Resources (MDNR). I described the results of our meeting with EPA Region IV and asked if the previously described course of action would be amenable to the needs of the MDNR. He indicated that he would like to meet with us to clarify the needs of "clean closure" prior to making any commitments concerning closure. Therefore, I have set up a meeting with him on December 18, 1989 at 3:00 pm. A late meeting time should provide you ample time to fly from Washington to Jackson on the same day.

Finally, I have provided as Attachment III a recent budget and status report for the Site Closure and Delisting tasks of the Full Scale Demonstration Project. I am currently working on a revised budget and schedule which will incorporate the changes mandated by delisting denial. I will transmit a revised budget and schedule to you by January 15, 1989. Any schedule or budget prepared prior to that date would most likely change due to the regulatory and political dynamics of this task.

I hope this information is useful to you. If you have any questions, please call me at (208) 526-9959.

Very truly yours,



Daniel J. Haley
Sr. Programs Specialist
Waste Engineering Development

Attachments:
As Stated

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cc: L. P. Leach, EG&G Idaho
✓ T. R. Sarros, NCBC
Maj. M. Shelley USAF RDVW
J. O. Zane, EG&G Idaho (w/o Att.)

Attachment I
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List of Meeting Participants
November 9, 1989
EPA Region IV
Atlanta, GA

Jim Scarbrough	EPA Region IV	404-347-3016
Jason Darby	EPA Region IV	404-347-3433
Lissie Ketcham	EPA Region IV	404-347-3433
Jeff Short	HQ USAF/LEEVO	202-767-0276
Doug McCurry	EPA Region IV	404-347-3433
Darrell Derrington	Versar	703-642-6740
Daniel J. Haley	EG&G Idaho	208-526-9959
Tom Sarros	NCBC Gulfport	601-865-2484
Beverly Foster	EPA Region IV	404-347-3433
Joe McCauley	Navy Charleston	803-743-0583
Maj. Tom Lubozynski	HQ AFESC/RDVW	904-283-2097
Maj. Mike Shelley	HQ AFESC/RDVW	904-283-2097
Elmer Aiken	EPA Region IV	

Attachment II
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DRAFT LETTER FOR PLAN CONCURRENCE

Date

Reply to the Attention of: AF HQ/LEEVO

Subject: SUMMARY OF PROPOSED NCBC SITE DISPOSITION ACTION

To Mr. James Scarborough
EPA Region IV
345 Cortland Street, NE
Atlanta, GA 30365

1. Thank you for meeting with us on November 9, 1989 to discuss the potential options for disposition of the processed soil remaining at the former Herbicide Orange storage site, NCBC Gulfport, Mississippi.
2. Per your suggestions, the Air Force will perform the following actions in an effort to return the site to beneficial use by the Navy.
 - Withdraw the delisting petition.
 - Revise the ground water model in the Decision Document to include the processed soil into the TCDD source term.
 - Revise the Decision Document to reflect EPA Region IV comments and to include other information concerning the processed soil.
 - Submit the revised Decision Document to Mississippi Department of Natural Resources (MDNR) for approval.
 - Submit the revised Decision Document to EPA Region IV for concurrence.
3. If you disagree with this course of action or have any additional requests please submit your requests to me as soon as possible.

Sincerely,

J. J. Short Title

Attachment III
DJH-29-89
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NCBC SITE CLOSURE PROJECT
BUDGET AND STATUS REPORT
November 18, 1989

1. Summary Status

The interim draft Decision Document was transmitted to AF/LEEVO on April 25, 1989. That document was also transmitted to the Mississippi Department of Natural Resources on May 4, 1989. Subsequently, representatives of EG&G Idaho, AF/LEEVO and NCBC visited MDNR in Jackson, MS to discuss the document. They were receptive to the overall approach but had not given the document careful review. Following that meeting, the same representatives visited EPA Region IV in Atlanta, GA. We again received favorable responses concerning the site disposition approach.

Between those meetings and November 9, we waited to hear from EPA/OSW concerning the delisting petition. On November 9, representatives from EG&G, Versar, AF/LEEVO, NCBC and NavFac/South Div met with EPA Region IV to confirm that OSW intended to deny delisting and to determine our future site disposition options. Those options are documented in the cover letter to this status report.

The statistical analysis for final site characterization of areas B and C in addition to the analysis of bottom of the hole data for Areas A, B, and C was completed on September 11, 1989. The final report which will incorporate those analyses will be written and submitted at a date to be determined.

2. Significant Accomplishments

The Interim Draft Decision document was transmitted to AF/LEEVO, EPA Region IV, and the State of Mississippi Department of Natural Resources for review.

3. Milestone Report

Submission of the draft Decision Document in April, 1989 was late due to the additional scope of risk analysis modeling.

Delivery of the Area B and C addendum report is past due.

Remaining milestones are highly uncertain due to the regulatory and political dynamics of this task.

Attachment III
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4. Cost and Schedule Status

Table 1 shows the expenditures under each MIPR for the reporting period. The total costs to date for those tasks is \$79,948. Approximately \$79,701 remains in the budget for the remainder of the tasks; the source for the majority of the remaining funds (\$61,582) is Tyndall AFB.

5. Problems/Recommendations

Delisting has been denied by EPA/OSW. The meeting between the Air Force and EPA Region IV on November 9 indicated that "clean closure" was a possibility. Specific methods for accomplishing clean closure will be negotiated with the Mississippi Department of Natural Resources. A meeting is currently scheduled for December 18, 1989 at 3:00 pm to discuss this issue.

Attachment III, DJH-29-89

NCBC Site Closure Task
Budget Report through November 18, 1989

FUNDING SOURCE	MIPR #	CHARGE #	Funds Available for FY-89	Total \$ Expended in FY-89	Remaining \$ @ close of FY-89	Expenses FY-90 to 11/18/89	Remaining FY-90 Funds @ 11/18/89
BOLLING	86112		\$0	\$0	\$0	\$0	\$0
BOLLING	86143	823920210		\$24,098		\$0	
MIPR TOTAL			\$24,098	\$24,098	\$0	\$0	\$0
BOLLING	8774	823920600		\$1,198		\$0	
		823920605		\$25,379		\$0	
MIPR TOTAL			\$44,696	\$26,577	\$18,119	\$0	\$18,119
TYNDALL	N8829	823921465		\$126		\$0	
		823921441		\$27,381		\$0	
		823920964		\$0		\$0	
TYNDALL	N8921	823922341		\$13,464		\$247	
MIPR TOTAL			\$102,800	\$40,971	\$61,829	\$247	\$61,582
Totals:			\$171,594	\$105,111	\$79,948		\$79,701

Note: All of the funds remaining in MIPR N8829 were transferred to MIPR N8921 in June, 1989.