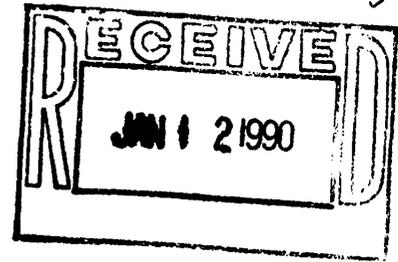


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MEETING MINUTES BETWEEN MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
AND U S AIR FORCE REGARDING DELISTING REQUEST 18 DECEMBER 1989 SITE 8
NCBC GULFPORT MS
1/8/1990
IDAHO NATIONAL ENGINEERING LABORATORY



January 8, 1990



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MINUTES OF MEETING WITH MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES - DJH-01-90

On December 18, 1989, representatives of the U. S. Air Force (LEEVO), Naval Construction Battalion Center (NCBC), and Naval Facilities Southern Division met with the Mr. Sam Mabry from the Mississippi Department of Natural Resources (MDNR) and his staff at their offices in Jackson, Mississippi.

J. J. Short opened the meeting with a brief description of why the Environmental Protection Agency (EPA) Office of Solid waste will deny delisting of the process ash remaining at NCBC. A discussion of the actions proposed by EPA Region IV ensued. It quickly became evident that MDNR is not in complete agreement with EPA Region IV. EPA Region IV had proposed a CERCLA type clean closure; however, MDNR does not believe that a clean closure is possible as long as a RCRA F028 waste (i.e., the processed soil) remains on the site. Therefore, MDNR believes that a RCRA post closure permit may be required for Area A, the portion of the former Herbicide Orange (HO) site that contains the processed soil. Carl Kneeling indicated that this may then open the door for MDNR to carefully examine all other Solid Waste Management Units (SMU) at NCBC. Currently, NCBC is considered a ninety-day generator so it does not have any solid waste management units.

MDNR wants to complete the site disposition but does not see a way through the regulatory maze to avoid a post closure permit. They suggested a meeting or conference call with EPA Region IV in mid-January 1990. The Air Force and Navy supported this suggestion.

MDNR then suggested that the Air Force or Navy carefully look at the regulations to see if we could find a way to keep the HO site disposition within the CERCLA regulatory realm. Hopefully, by remaining within CERCLA, we could avoid writing a post closure permit. As discussed in the meeting, one strong point for staying within CERCLA would be that the Defense Environmental Restoration Agency (DERA) has funds to work on CERCLA type projects. Whereas, if RCRA applied, the Air Force or Navy would have to request the money from a different source which would take approximately five years to receive funding and commence action.

Another discussion followed concerning ground water monitoring. Regardless of the course of action, it is obvious that groundwater monitoring will be required. MDNR was quite insistent about this



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point. The Air Force representatives had previously recognized this data weakness and agreed to the additional monitoring. I indicated that prior to monitoring, we would develop and submit a very specific work plan for MDNR approval. The monitoring plan should attempt to validate the input parameters of the groundwater model.

As part of the groundwater monitoring discussion, MDNR expressed concern about constituents other than 2,3,7,8-TCDD that might be remaining at the site. (Although not discussed in the meeting, I feel that additional sampling of bottom of the hole samples and unremediated plots with subsequent analysis for herbicides is inevitable.)

The meeting adjourned with an agreement to meet again in mid-January, 1990. Sam Mabry will arrange the meeting time and place with EPA Region IV.

Following the meeting with MDNR, the Air Force and Navy representatives remained to discuss further strategy. No solutions were readily apparent; however, AF/LEEVO agreed to contact their environmental legal staff for guidance in an effort to keep the site disposition strictly in the CERCLA realm. It was mutually decided that Tom Sarros, NCBC, should be the lead point of contact between the regulatory agencies and the project. This point had previously been discussed with MDNR. AF/LEEVO agreed to provide technical and legal support as necessary to NCBC for site disposition. Gregg Benjock (Naval Facility Southern Division) agreed to determine if the required groundwater monitoring for the HO site could be included into the overall groundwater monitoring plan for the entire NCBC base.



D. J. Haley
Sr. Program Specialist

dl

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G. J. Benjock, Nav-Fac South-Div
C. Kneeling, AF/LEEVO
✓ T. R. Sarros, NCBC
J. J. Short, AF/LEEVO

cc: J. O. Zane, EG&G Idaho