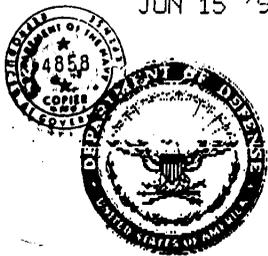


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LETTER REGARDING INCINERATOR ASH AND HERBICIDE ORANGE SITE 8 NCBC  
GULFPORT MS  
3/27/1990  
U S AIR FORCE



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS UNITED STATES AIR FORCE  
WASHINGTON, D.C. 20332-5000

27 MAR 1990

Mr James H. Scarborough  
Chief, RCRA Branch  
Waste Management Division  
U.S. EPA, Region IV  
345 Courtland St., NE  
Atlanta, GA 30365

1. This is in response to your 19 January 1990 letter to Lt Col Thomas Lubozynski, Tyndall AFB, FL regarding the incinerator ash and Herbicide Orange (HO) site at NCBC Gulfport, MS. We continue to believe that prompt action on our previously submitted RCRA delisting petition is the most appropriate solution for all parties. However, we have arranged for the preparation of a CERCLA-based risk assessment and expect to be able to forward it to you in April.
2. Minor inconsistencies and typographical errors noted in the draft decision document for NCBC site #8 will be corrected. The Risk Assessment does not incorporate your (faxed) comments on the degradation rate of tetrachlorodibenzo-dioxin (TCDD) in either soil or groundwater. Incorporation of the degradation rate of TCDD into the Risk Assessment would be complicated by the fact that all plots with TCDD levels higher than 1 part per billion were incinerated. Any additional sampling to check on TCDD degradation on untreated plots would be inconclusive due to the relatively high method detection limits of the original site survey.
3. We also met with the Navy to coordinate the Installation Restoration Program (IRP) activities at NCBC, specifically for the HO site. All additional work required on the HO site will be performed by the Navy as part of the Navy's IRP. This includes the investigation and characterization of any HO residuals in the soil and groundwater and all work required to complete the risk assessment of the site. A draft scope of work for review and coordination by all parties (MSDEQ, EPA IV, Navy, and Air Force) is expected this May.



The draft scope of work will include:

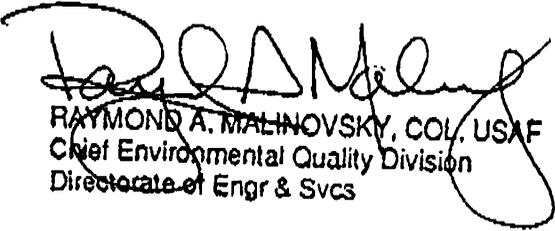
(1) Develop a list of constituents that could result from HO storage, degradation or incineration for inclusion in the groundwater sampling plan;

(2) Develop a sampling strategy for the presence of characteristic dioxins, furans, herbicides and their degradation products in the excavated and unexcavated plots at NCBC;

(3) Conduct the site investigation;

(4) Prepare an evaluation of the sampling results and incorporate into a Risk Assessment document for IRP Site #8, NCBC, Gulfport, MS.

4. The point of contact for the site work is Mr Tom Sarros of NCBC, Gulfport MS, (601) 865-2484. The points of contact for the planned efforts involving the incinerator ash are Mr Jeff Short at (202) 767-0276 or Mr Karl Kneeling and (202) 767-4151 of this office.

  
RAYMOND A. MALINOVSKY, COL, USAF  
Chief Environmental Quality Division  
Directorate of Engr & Svcs

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