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STATEMENT OF WORK AT SITE CLOSURE AREA SITE 8 NCBC GULFPORT MS
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IDAHO NATIONAL ENGINEERING LABORATORY



STATEMENT OF WORK

NCBC SITE CLOSURE

Submitted to the

**Department of Defense
USAF/HQ-LEEVO**

by the

**IDAHO NATIONAL ENGINEERING LABORATORY
EG&G IDAHO, INC.**

May 1990



STATEMENT OF WORK FOR
NCBC SITE CLOSURE

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NCBC SITE CLOSURE STATEMENT OF WORK

1. WORKSCOPE

1.1 Purpose and Background

Herbicide Orange (HO), a defoliant used by the Department of Defense prior to 1970, was stored at the Naval Construction Battalion Center (NCBC), Gulfport, Mississippi, at an open air site during various periods from 1965 to 1977. All remaining drums of HO were incinerated at sea with the cooperation of the US Environmental Protection Agency. During storage, many of the drums leaked and contaminated the underlying cement stabilized soil.

In 1979 the U.S. Air Force, Office of the Assistant Secretary made a commitment to the United States Navy to return the former HO storage site to full and beneficial use. As a result, several research development and demonstration projects were undertaken to characterize the former herbicide storage area and to determine the cost effectiveness and capabilities of various technologies for soil decontamination. In 1984, the former HO storage area was initially characterized and a detailed data report was published. In 1986, additional contamination was discovered; although the new areas were characterized, the data were not published.

Also in 1986, testing of a full scale rotary kiln incinerator began and continued until late 1988. At the completion of that demonstration, all contaminated soil was processed and one of the AF goals, namely to demonstrate reliable decontamination technologies, was achieved.

In order to achieve the second AF goal of returning the site to full and beneficial use, the site must undergo a technical and EPA regulatory process called site closure. As part of that process, documents are prepared that: a) demonstrate the cleanliness of the site and, b) provide subsequent detailed plans for additional monitoring or remedial action, if required.

The NCBC Site Closure project is being conducted as an extension of the "USAF Sampling and Analysis Program" (Statement of work EG&G/SOW-04-84 USAF Sampling and Analysis Program, May 25, 1984). NCBC site closure is a logical extension of the work described in the original SOW in that site closure requires several of the same elements as the original SOW. For example, the soil sampling activities, soil analytical results, and the hydrogeologic data reported in the original SOW are an integral part of site closure.



1.2 Objectives

The objectives of this project are to plan, document, and submit a petition to the US Environmental Protection Agency and the Mississippi Department of Natural Resources, which requests that the site be considered closed and allows the site to be returned to beneficial and nonresidential use by the United States Navy.

The site closure project will include the following tasks as a means to achieving the stated goals.

- 1.2.1 Define the closure requirements and other applicable requirements for the former HO storage site. Review the published regulatory requirements, guidance manuals, and any available similar closure plans and determine their applicability to the NCBC closure task.
- 1.2.2 Define a strategy, scope of work, and schedule for effecting the NCBC site closure. Once USAF and USN approves this statement of work, submit the SOW to the regulatory agencies for review and approval of the general closure strategy.
- 1.2.3 Through discussions with the regulatory agencies and their review of the SOW previously described, determine the need and extent of additional sampling and analysis required to support site closure. Also determine what statistical analyses, if any, are required for data presentation. Develop appropriate sampling and analysis plans for both soil and groundwater. The sampling and analysis plans should have approval of both the EPA and the Mississippi Department of Natural Resources before starting the sampling and analysis program.
- 1.2.4 Obtain samples from both remediated and unremediated soil plots, as well as water samples from several groundwater monitoring wells situated near the NCBC Demonstration Project site. The RCRA criteria pertaining to the number of wells required will be used for technical guidance only. The number of samples will be statistically determined prior to commencement of any field activities.

Initially, all samples will be analyzed for metals and herbicides. If herbicides in the samples are non-detectable or less than regulatory requirements, it is assumed that no additional analysis will be required. If analysis shows the presence of herbicides, the samples will be further analyzed for Polynuclear Aromatic Hydrocarbons, Dioxins/Furans, and potential degradation products. Attachment 1 contains a list of the analytes to be considered for both the soil and groundwater samples. CLP protocols, or other protocols specifically approved by the regulating agencies, shall be employed and analytical data shall be reviewed and validated as necessary. The data shall be statistically analyzed as necessary and reported to the U. S. Navy and the appropriate regulating agencies.



- 1.2.5 Collate all pertinent closure and delisting data and associated statistical analyses for incorporation into a Risk Assessment and subsequent Decision Document.
- 1.2.6 If necessary, plan and coordinate a public hearing in which the USAF will discuss the record of decision with the general public. The time and location of this hearing will be determined by the regulatory agencies.
- 1.2.7 Assist the USAF in responding to the written comments submitted by the regulatory agencies and written public opinion comments. Incorporate the resulting comment resolutions into the decision document and resubmit to the USAF, USN, and the regulatory agencies for final approval.
- 1.3 Specifically Excluded Scope

This scope of work does not cover the writing and submission of a delisting petition for the MWP-2000 process ash. However, close coordination between the delisting task and this task is necessary and will be in effect.

Although the INEL will manage and/or conduct the above activities, the INEL will not itself take a direct role in regulator and public interactions.



2. COST AND SCHEDULE FOR SUBSECTION 1.2.3

2.1 Cost of Plans from 1.2.3

2.1.1	Prepare Soil Sampling and Analysis and Groundwater Monitoring Plans	\$40.0K
2.1.2	Review Plans and Transmit to USAF	<u>6.0K</u>
	Total Plans Cost	\$46.0K

2.2 Schedule for Plans from 1.2.3

2.2.1	Preparation of Draft Plans	30 days after approval to proceed
2.2.2	Internal Review of Plans by EG&G Idaho	2 weeks
2.2.3	Finalize Plans	2 weeks

Costs and Schedules for other sub sections of this SOW will be developed as requirements are finalized.