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NCBC GULFPORT
5090.3a

LETTER AND COMMENTS FROM U S NAVY REGARDING REVIEW OF DRAFT ASH AND
GROUNDWATER SAMPLING AND ANALYSIS PLAN DELISTING PETITION SUPPORT NCBC
GULFPORT MS
12/27/1991
U S NAVY



DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2155 EAGLE DR., P. O. BOX 10068
CHARLESTON, S. C. 29411-0068

400 ~~600~~
409
470 ~~110~~
470 ~~22~~

PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER.
REFER TO:

5090 / SA
Code / 181210

27 DEC 1991

From: Commanding Officer, Southern Division, Naval Facilities
Engineering Command
To: Headquarters United States Air Force, Attn: Mr. Jeff Short
Subj: REVIEW OF DRAFT "ASH AND GROUND-WATER SAMPLING AND
ANALYSIS PLAN DELISTING PETITION SUPPORT, NAVAL
CONSTRUCTION BATTALION CENTER (NCBC), GULFPORT,
MISSISSIPPI"

Ref: (a) Headquarters United States Air Force ltr. dated 18 Nov
1991

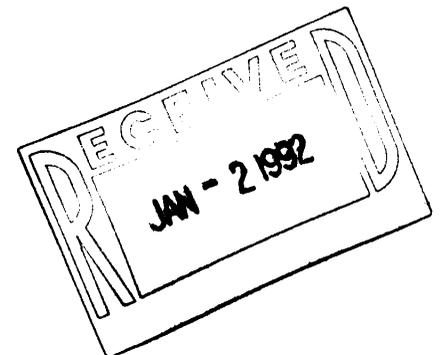
Encl: (1) SOUTHNAVFACENGCOM and ABB Environmental Services
comments on subject plan

1. As requested by reference (a), enclosure (1) is forwarded for
your consideration.

2. If you have any questions, please contact Mr. Dan Owens, Code
181210 at (803) 743-0331 or A/V 563-0331.

E. M. MORRISON
By Direction

Copy to:
CBC Gulfport



SOUTHNAVFACENCOM AND ABB ENVIRONMENTAL SERVICES
COMMENTS ON DRAFT "ASH AND GROUND-WATER SAMPLING
AND ANALYSIS PLAN DELISTING PETITION SUPPORT,
NAVAL CONSTRUCTION BATTALION CENTER (NCBC),
GULFPORT, MISSISSIPPI"

GENERAL COMMENTS

A recent federal appeals court ruling in the case of Shell Oil Co. v. EPA has stated that the EPA improperly promulgated the "derived-from" and "mixture" rules, but the decision is not final until the court issues an official mandate to the EPA. If the "derived-from" rule is set aside the incinerator ash will no longer be classified as a listed waste and will only have to pass the Toxicity Characteristic Leaching Procedure test to be classified as a non-hazardous waste. We may be able to drop the delisting petition and construct warehouses on Site A with no further studies if this ruling is finalized.

SPECIFIC COMMENTS

Page 7, Section 2.2 Specify what type of personal protective equipment will be used, must be in full face respirator if any dust hazard exists.

Page 7, Section 2.2 Specify that VOCs can be lost during size reduction and mixing and provide better process detail to avoid/limit loss.

Page 8, Section 2.3 Specify the process to be used for selecting the five random ash samples.

Page 25, Section 2.4 Define "laboratory pure water".

Page 25, Section 2.4 In the first paragraph, modify second sentence to read, "One of each of these samples...".

Page 25, Section 2.4 In the fourth paragraph, modify to require that equipment blank sample containers be filled directly vice collecting water in one container then transferring to sample bottles.

Page 29, Section 3.1 Who will make the decision as to which four monitoring wells will be sampled? What will the decision be based on? Please specify.

Page 29, Section 3.2 Field personnel should approach the wells in an adequate level of protection and reduce the level of protection only if test results allow.

Page 29, Section 3.2 Please reference the document that details the level of personal protective equipment required for the different concentration limits of total hydrocarbons. What if the total hydrocarbons exceed 20-ppm?

Page 31, Section 3.2, Paragraph 3 Specify that the disposal point into the wastewater treatment facility will be coordinated with the CBC Environmental Coordinator (Mr. Gordon Crane).

Page 31, Section 3.2 How will the marker be decontaminated and who will provide the 55-gallon drums?

Page 38, Section 3.3 Include a table defining limits for classifying data as hazardous.

Page 41, Section 3.4, Paragraph 4 Same comment as on page 25, paragraph four.

Page 43, Section 4.1 Delete the word "Versar" in paragraph 1. Paragraph 2 suggests more than one laboratory will be used. Recommend a single laboratory be used and the word "each" be changed to "the".

Page 43, Section 4.2 Are these procedures adequate for samples that may contain dioxins?

Page 46, Section 4.2 Modify the second paragraph to include a chain-of-custody form in each ice chest for the specific content of the ice chest.

Page 49, Section 5.0 Modify the first paragraph to read, "...depends upon field and laboratory procedures which are conducted..."

Page 53, Section 6.0 Specify that the HASP is Appendix A to the Soil Sampling and Groundwater Sampling Programs plans. You can delete all other references to health and safety in sections 2.2 and 3.2. You can delete all references to health and safety in Sections 2.2 and 3.2.