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NCBC GULFPORT
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LETTER REGARDING U S AIR FORCE REQUEST FOR RISK ASSESSMENT FOR THE
INCINERATOR ASH FOR SITE 8 NCBC GULFPORT MS
2/21/1990
DEPARTMENT OF THE AIR FORCE



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

Subject: Request for Risk Assessment for Naval Construction
Batallion Center (NCBC)

1. Following our Dec 89 meeting with the Mississippi Department of Environmental Quality (MS DEQ), we examined your 19 Jan 90 letter regarding the Herbicide Orange (HO) site at NCBC Gulfport, MS including your faxed comments on the risk assessment (RA) proposed in the draft Decision Document for site #8. As you requested, the Air Force will submit the RA for the incinerator ash independent of the effects of the untreated part of the site. We expect to provide your office and the Mississippi Department of Environmental Quality (MS DEQ) with a certified risk assessment document by 1 Apr 90.

a. Minor inconsistencies and typographical errors noted in the figures and decision document text will be corrected. The RA will follow the guidance in the Superfund Exposure Assessment Manual to determine exposure pathways and assumptions.

b. The RA 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 RA 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.

2. We also met with the Navy to coordinate the Installation Restoration Program (IRP) activities at NCBC, specifically for the HO site. We agree that more information is needed on the possible HO residuals in the soil and groundwater to support final IRP site documents.



a. Additional data are needed to finalize the risk assessment at the site. Currently, only data concerning the levels of TCDD in the fauna downstream of the site is available. Additional site samples will be collected and analyzed to characterize the actual herbicide (2,4-D and 2,4,5-T) and TCDD levels remaining in the untreated soil. Also, sampling of the groundwater will be conducted.

b. The draft scope of work should be available for review and coordination by MS DEQ, EPA Region IV, the Navy and the Air Force by 1 May 90. We have directed our contractor to prepare the scope of work to:

(1) Construct 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.

3. Please contact either Mr Jeff Short at (202) 767-0276 or Mr Karl Kneeling at (202) 767-4616 if you have any questions.

cc: HQ AFESC/RDV
NCBC, Gulfport, Code 470.2
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MS DEQ (Mr Mabry)
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