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NCBC GULFPORT
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LETTER OF TRANSMITTAL AND BACKGROUND PAPER ON THE HERBICIDE ORANGE
STORAGE SITE NCBC GULFPORT MS
6/3/1993
DEPARTMENT OF THE AIR FORCE



DEPARTMENT OF THE AIR FORCE
AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE (AFCEE)
ATLANTA, GEORGIA

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FROM: AFCEE/CCR-A
77 Forsyth Street, S.W.
Suite 295
Atlanta GA 30335-6801

3 Jun 93

SUBJ: Update for Ash Delisting Petition No. 0759

TO: Mr Narendra Chaudhari
U.S. Environmental Protection Agency
Office of Solid Waste Characterization
and Assessment Division (OS-330)
401 M Street, S.W.
Washington DC 20460

1. In response to our conversation of 25 May 93, I have enclosed a background information paper and copy of a proposed project schedule for sampling and analysis of groundwater at the former Air Force Herbicide Orange Storage Site at the Naval Construction Battalion Center (NCBC) in Gulfport, MS.
2. The Air Force provided \$850,000 in FY-93 funding for the Southern Division of the Naval Facility Engineering Command to provide contract management services to develop a site groundwater monitoring plan, install shallow monitoring wells, collect and analyze quarterly groundwater samples for one year. Contractor tasking is expected in Jun 93.
3. A follow-up meeting will be held on or about Apr 94 to review the analytical values of the first quarter groundwater samples. These initial laboratory results will help to finalize the Air Force decision on whether to continue or withdraw the current ash delisting petition. A final groundwater report from the Air Force should be available after Dec 94.
4. I look forward to meeting with you to discuss our delisting petition. Should you have any questions, please do not hesitate to give me a call at (404) 331-6935.

JOHN M. GORDON, P.E.
Remedial Program Manager

2 Atch
1. Background Paper
2. Proposed Schedule

cc: Mr Gordon Crane, NCBC-Gulfport
Mr Dan Owens (Code 18210), South-NAVFACENCOM
✓ Mr Ken Barnes (Code 1665), South-NAVFACENCOM
Mr Jim Hardage, MS DEQ
Mr Jerry Banks, MS DEQ
Mr Arthur Linton, EPA Region IV

BACKGROUND PAPER

FORMER USAF HERBICIDE ORANGE (HO) STORAGE SITE NAVAL CONSTRUCTION BATTALION CENTER (NCBC) GULFPORT, MISSISSIPPI

1. 1968-1977: Herbicide Orange (2,4,5-Trichlorophenoxyacetic acid) was staged at NCBC, Gulfport from 1968 to 1977 until the use of Herbicide Orange (HO) was suspended by DOD. After removal of approximately 850,000 gallons from NCBC with final disposal by high temperature incineration at sea in 1977, the USAF instituted a site monitoring program at NCBC to determine the extent and magnitude of dioxin contamination.

2. 1977-1980: Remedial characterization of the former HO storage site at NCBC was conducted by the USAF Occupational and Environmental Health Laboratory (OEHL) during 1977-1979, followed by the Air Force Engineering and Services Center (AFESC) Engineering & Services Laboratory (ESL) after 1980. These initial soil monitoring programs led to a comprehensive soil characterization study in 1984-1986 by EG&G Idaho under contract to ESL. A number of cursory investigations were conducted by USAF OEHL in off-site areas of NCBC to determine the TCDD concentration in surface water, sediment, and biological samples. In addition, a literature study characterized the probable hydrogeological impact of a dioxin release to groundwater quality. Groundwater samples were collected on a one-time basis from two of the three NCBC wells to measure the dioxin concentration in the drinking water supply.

3. 1984-1987: The USAF, with the assistance of EG&G Idaho, solicited proposals in 1984 from hazardous waste remediation contractors to demonstrate technologies to destroy or otherwise remove dioxin from soil. The first verification testing of an ENSCO Corporation Mobile Waste Processor (MWP-2000) was conducted in December 1986 to provide preliminary effectiveness data to EPA Region IV. A trial burn to establish thermal destruction and removal efficiency (DRE) of the unit was performed in May 1987 followed by EPA Region IV issuance of a RCRA RD&D permit to conduct full-scale treatment of the contaminated soil.

4. 1987-1988: During remediation from November 1987 to November 1988, about 15,000 cubic yards of contaminated soil excavated from Areas A, B and C was incinerated based on a cleanup criteria of 1.0 part per billion (ppb). Even though the site is nonresidential, the Air force remediated to a level of 1.0 ppb in the soil because (1) there was no precedence for the cleanup criteria to be higher than 1.0 ppb (although, a cleanup level of 20 ppb was proposed for Times Beach, Mo.), and (2) the land-ban restrictions prohibited disposal of wastes which have a dioxin concentration greater than 1.0 ppb.

5. 1988-1992: EPA Region IV deferred to HQ/EPA the approval for final disposal of the incinerated ash. In November 1988, the Air Force submitted a petition to HQ/EPA for delisting of the ash as a RCRA hazardous waste. Draft sampling and analysis plans for the ash and groundwater (developed by Versar under Air Force contract) were submitted to HQ/EPA in February 1992 to supplement operational data which was presented in the original delisting petition. Upon review, HQ/EPA stated in May 1992 that the Air Force delisting petition was incomplete and the Versar supplemental plans were inadequate.

HQ/EPA also stated that the Air Force must provide additional sampling of the incinerated ash stored at Area A to measure the accuracy of previous dioxin analyses, and install a groundwater monitoring system for the storage site (Areas A, B, and C) to determine the existence of dioxin contamination in the groundwater aquifer. This new analytical data must be submitted to HQ/EPA before a decision will be finalized on the delisting petition.

6. September 1992: On 10 September 1992, a meeting held in Gulfport, MS between the Naval Construction Battalion Center (NCBC), South Division Naval Facility Engineering Command (SOUTHNAVFACENGCOM), Mississippi Department of Environmental Quality (MSDEQ), and Environmental Protection Agency (EPA) Region IV discussed the current status of the Air Force's ash delisting petition and impact on the Navy's IRP program. This meeting was not attended by the Air Force due to an organizational shift in project management from AF/CEVR to AFCEE, (AF/CEVR letter of 2 September 1992).

7. February 1993: A Summary List of Active Delisting Petitions for EPA Region IV, dated 25 February 1993, listed petition number 0759 as active, and stated that the Air Force had not responded to EPA letter of 1 May 1992.

8. April 1993: AFCEE/CCR-A sponsored a meeting between the Air Force, NCBC, SOUTHNAVFACENGCOM, MSDEQ, and EPA Region IV in Atlanta, GA on 5 April 1993. Agreement was reached by the represented agencies on the following conclusions and actions:

a. EPA Region IV and MSDEQ agreed that the three areas (Area A, B, and C) of the former H0 storage site could be closed as a single regulated unit under RCRA.

b. EPA Region IV and MSDEQ agreed that Area A is a RCRA regulated unit on the basis of the ash storage and that the best approach for this site is to place a RCRA cap over the treated ash; instead of ash removal to a landfill or continuing with the delisting petition. However, information on groundwater quality must be determined first before approval is given on the disposition of the ash or development of a closure plan for the site.

c. MSDEQ will be the lead agency for groundwater and RCRA permitting, with review by EPA Region IV.

d. Air Force will provide funding and project management oversight, and SOUTHNAVFACENGCOM will provide contract management services for site work. The estimated expense for FY-93 is \$850,000. No funding is expected for FY-94 for this project; however, additional funding will be required in FY-95 for closure of the site.

e. The SOUTHNAVFACENGCOM contractor will develop a site groundwater monitoring plan, install shallow monitoring wells, collect quarterly groundwater sampling for one (1) year, and perform laboratory analyses on the complete RCRA Appendix IX list of parameters, to include dioxins and furans.

f. A followup meeting will be held in about one year (April 1994) to review the initial analytical results from the first quarter samples, and to finalize a decision on whether the Air Force should continue to pursue the ash delisting petition, or to withdraw the petition and proceed with site closure.

Mr. Gordon/CCR-A/404-331-5369/12 Apr 93

FORMER AIR FORCE HERBICIDE ORANGE STORAGE SITE
 AT
 NAVAL CONSTRUCTION BATTALION CENTER
 GULFPORT, MISSISSIPPI

PROPOSED PROJECT SCHEDULE
 5 April 1993

ACTIVITY OR TASK	INTERVAL(DAYS)	PROPOSED DATE
NAVFACENCOM-Contractor Tasking	60	7 JUN 93
Draft GWM Workplan Submittal to NAVFACENCOM/AFCEE	30	9 JUL 93
NAVFACENCOM/AFCEE Comments to Contractor	14	23 JUL 93
Final Draft GWM Workplan Submittal to MSDEQ	14	6 AUG 93
MSDEQ/EPA Region IV Regulatory Review	45	17 SEP 93
Response to Regulatory Comments/Final Plan Submittal	30	15 OCT 93
Field Work: Install and Complete GWM Wells	45	1 DEC 93
Development and Stabilization of Wells	30	1 JAN 94
Well Sampling, 1st-Quarter		1 JAN 94
Data Interpretation and 1st-Qtr Report Submittal (*)	60	1 MAR 94
Well Sampling, 2nd-Quarter		1 APR 94
Data Interpretation and 2nd-Qtr Report Submittal	60	1 JUN 94
Well Sampling, 3rd Quarter		1 JUL 94
Data Interpretation and 3rd-Qtr Report Submittal	60	1 SEP 94
Well Sampling, 4th Quarter		1 OCT 94
Data Interpretation and 4th-Qtr Report Submittal	60	1 DEC 94
Submittal of Final GW Report to MSDEQ/EPA Region IV	30	31 DEC 94

* Final decision to continue with the Delisting Petition will be indicated by the analytical values determined from the first quarter groundwater samples.