

N62604.AR.001800
NCBC GULFPORT
5090.3a

LETTER REGARDING THE ENGINEERING SERVICE REQUEST TO DEVELOP
RECOMMENDATIONS TO SECURE THE INCINERATION ASH LOCATED AT HERBICIDE
ORANGE STORAGE AREA A NCBC GULFPORT MS
8/31/1994
NAVFAC SOUTHERN DIVISION



DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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NCBC Gulfport Administrative Record
Document Index Number

39501-SITE 8 INCINERATION
19.01.08.0022

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

5090/9-1
Code 1821
31 Aug 1994

From: Commanding Officer, Southern Division, Naval Facilities
Engineering Command
To: Commanding Officer, Naval Construction Battalion Center,
Gulfport, MS
Subj: CBC GULFPORT ENGINEERING SERVICE REQUEST (ESR) 04-94, SECURE
ASH
Ref: (a) Meeting btwn Mr. B. Mordecai and Mr. D. Owens,
SOUTHNAVFACENGC/COM/Mr. G. Crane, CBC Gulfport/Ms. P.
Baxter, ABB on 11 Aug 1994

1. The subject ESR requests assistance in developing recommendations necessary to secure the incineration ash located on Area A in the event of heavy winds or other destabilizing forces. The current situation is that the ash, a F028 listed hazardous waste until and unless delisted, is piled on Area A in waste piles that do not meet all the requirements for permitted waste piles specified in 40 CFR 264. In addition to inadequate controls to prevent wind dispersal, the facility does not meet requirements for leachate and storm water runoff control. This improper management could result in enforcement action by the Mississippi Department of Environmental Quality or EPA Region IV.

2. As you are aware, a sampling and analyses plan is currently being executed to support the delisting of this ash as a RCRA hazardous waste. This plan was approved by both EPA Headquarters and the Mississippi Department of Environmental Quality (MSDEQ). As discussed during reference (a), securing the ash piles in a manner which disturbs the surface may invalidate the terms of the delisting petition. Regulatory input and approval is essential prior to taking any action to secure the ash piles.

3. The initial ash and groundwater sampling results for Area A are due by October 1994. At that time, with the risks properly identified, a meeting will be scheduled with the appropriate EPA and MSDEQ officials to determine whether to continue to pursue the delisting of the ash. If delisting remains viable, the need to secure the ash and to what extent will be discussed with the regulators. We will be prepared to present any feasible options to secure the ash during the meeting. If delisting is not possible, significant RCRA closure actions, including possible removal and disposal of the ash piles as a hazardous waste, would be needed.

4. After the sampling results are known, we will attempt to schedule the meeting with the regulators at the earliest possible date. This letter serves as a response to the subject ESR. Should you have any questions, please do not hesitate to contact Mr. Baker Mordecai at DSN 563-0690 or Mr. Dan Owens at DSN 563-0331.

E. M. Morrison

E. M. MORRISON
By direction