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NCBC GULFPORT
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MINUTES FROM 5 APRIL 1993 HERBICIDE ORANGE STORAGE SITE PROJECT
DEVELOPMENT MEETING NCBC GULFPORT MS
4/5/1993
NCBC GULFPORT

Meeting Minutes
Herbicide Orange Storage Site
NCBC Gulfport, MS
Project Development Meeting
5 April 93

Attendees:

<u>Name</u>	<u>Telephone No.</u>	<u>Organization</u>
John M. Gordon	(404) 331-6935	AFCEE/CCR-A
Arthur G. Linton	(404) 347-3776	EAP-OPM-FAB
Thomas D. Sims	(404) 331-6771	AFCEE/CCR-A
David F. Holroyd	(404) 347-3776	EPA-OPM-FAB
Elizabeth Bartlett	(404) 347-3433	EPA-RIV-RCRA
Frank Cater	(615) 531-1922	ABB-ES
Marland Dulaney	(904) 656-1293	ABB-ES Tallahassee, FL
William A. Dos Santos	(601) 871-2241	NCBC Gulfport, MS
Gordon Crane	(601) 871-2485	NCBC Gulfport, MS
Daniel Owens	(803) 743-0331	SOUTHNAVFACENCOM
Kenneth G. Barnes	(803) 743-0669	SOUTHNAVFACENCOM
Jerry B. Banks	(601) 961-5221	MSDEQ, HW Division
Jim Hardage	(601) 961-5065	MSDEQ, HW Division
Wayne Mathis	(404) 347-3776	USEPA IV OPM-FAB
Michael Cunningham	(404) 331-0049	AFLSA/JACE-ER
David C. Stewart	(404) 331-5312	AFLSA/JACE-ER
Beverly Williams	(404) 347-3433	EPA IV RCRA Permitting
Penny M. Baxter	(615) 531-1922	ABB-ES
Gena Townsend	(404) 347-3016	EPA IV-FED Fac. (NPL)

A meeting was held among the above attendees at the AFCEE offices in Atlanta, GA on 5 April 1993. John Gordon/AFEC opened the meeting with a round of introductions. Personnel from the Air Force, NCBC Gulfport, MSDEQ, USEPA Region IV, SouthDiv, and ABB-ES were present. A brief review of the site background was presented by Dos Santos/NCBC. The following bulleted items represent discussed topics:

- Status of the site. The USEPA-IV and MSDEQ were clear in considering the Site A to be a RCRA waste pile. Sites B and C are not at this time considered RCRA sites. Delisting efforts for the ash, described below, have not been accepted by EPA Headquarters.
- Delisting petition. The Air Force and Navy have forwarded a delisting petition to USEPA Headquarters but no conclusion has been reached on the status of the ash, pending further site investigation support. The petition is for delisting the ash only. The point was made that the Base needed to move the ash to fulfil the building plans of the Base. Per Linton/EPA the information on future use is very important. Bartlett/EPA stated the site is a RCRA waste pile and that groundwater monitoring will be required. A decision point will be reached if the groundwater is found to be contaminated. A

determination will be made whether to continue to pursue delisting or pursue a RCRA closure.

• Groundwater investigation. The question was asked that if the ash was containerized, would groundwater monitoring still be required. The answer was yes. Bartlett/EPA made the point that as the site now sits it cannot physically be separated from the ash. The treated ash is still hazardous waste (F028). At least one year of quarterly sampling of groundwater monitoring wells will be required in a RCRA scenario groundwater monitoring network and protocol (QA/QC) per Mathis/EPA. Only the shallow aquifer need be monitored at this time. Per Bartlett/EPA RCRA regulations require uppermost aquifer only and perimeter monitoring as a first stage. Linton/EPA made the statement that a total plan for groundwater investigation for the facility was needed but only implemented as necessary.

• Closure of the site. Per Bartlett/EPA if the site is does not go to clean closure, there will be a 30 year post closure groundwater monitoring period. If groundwater contamination is not found, the post closure monitoring period will be abbreviated. A dirty closure will likely include a RCRA cap with the required monitoring and groundwater treatment. Construction may be allowed on closed SWMUs. Per Linton/EPA a dirty closure is a known process that will take approximately 3 years for regulatory decision.

• HRS II score and NPL. Townsend/EPA stated that she had done the HRS II score on the site and did not look at dioxin. NCBC is not on the NPL and in her scoring did not see a threat to the aquifer. There had been no "observed" release to surface water and, therefore, there was no threat to the food chain. For a threat to be considered a link of source to affected area (biota) must be shown. Canal 1 is a persistent, constantly flowing, natural surface water body. There was some discussion of the group on possible dioxins found in crawfish at some distance from the site. EPA's concern, per Mathis, is that if there is an observed release the base will be re-ranked and possibly go on the NPL.

• Responsibilities of regulators. Dos Santos/NCBC made the comment that there was some confusion regarding which regulatory body was directly responsible for this site. The bottom line is that the Base answers to the Mississippi regulations/regulators for the groundwater monitoring program. Per Bartlett/EPA Region IV will lend technical support by document/work plan review but that EPA comments to the MSDEQ, not directly to NCBC. USEPA HQ will have the lead for work associated with the delisting petition support.