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MINUTES FROM THE 1 MARCH 1995 HERBICIDE ORANGE SITE A PROJECT MEETING  
NCBC GULFPORT MS  
3/1/1995  
NCBC GULFPORT

Meeting Minutes  
March 1, 1995  
Herbicide Orange Site A  
NCBC, Gulfport, MS

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A meeting was held at the offices of MDEQ on March 1, 1995 in Jackson, Mississippi to present data related to the groundwater monitoring and ash sampling programs for Herbicide Orange (HO) Site A and to discuss options of delisting or not delisting the ash. Specific issues, questions, discussion, and comments made during the meeting include the following:

- Site History. Baker Mordecai opened the meeting with an overview of the site history. The use of Herbicide Orange (HO) ceased in 1977 and a preliminary site investigation began at the former HO storage area in 1984. Following a successful trial burn, soils which were contaminated with 1 part per billion (ppb) or more of 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) were excavated and incinerated. Ash from the incineration process was placed at the former HO storage area on Site A. A delisting petition was submitted to the EPA in 1988; however, in 1992, the USEPA advised the Air Force to withdraw the petition. It was decided in April, 1993 that a groundwater monitoring plan and ash sampling plan should be implemented and presented as an addendum to the delisting petition. The USEPA has recently given delisting authority to MDEQ.
- Ash Data. Kate Kelly presented the analytical data from the ash sampling. Eleven composite ash samples, including one duplicate sample, were collected from ten randomly selected 50' by 50' grids. Each sample was collected from each ash pile at the surface, at depths of 1/3 and 2/3 the height of the pile, and at the ash/soil interface. For the original sampling event in April 1994, the dioxin and furan analytical data was rejected because of deviations from USEPA method 8290. Samples were recollected in August 1994 and

analyzed at laboratory cost. The maximum detected concentration of dioxin in the ash had a toxicity equivalency of 6.934 ppt. No dioxin was detected in the leachate from the toxicity characteristic leaching procedure (TCLP) analyses. Two analytes, benzene and barium, were detected from TCLP analyses; however, both analytes were detected at levels below TCLP limits.

- Groundwater Data. Four monitoring wells, one upgradient and three downgradient, were installed at the former HO storage area. The first of four quarterly sampling events occurred in May 1994. Groundwater results from the first two sampling events did not detect any substantial TCDD equivalents. However, the third groundwater sampling event detected a maximum toxicity equivalency of 22.6 ppq (the MCL is 30 ppq). The difference is believed due to a change in analytical laboratories and the difference in extraction methods utilized by those labs. The original laboratory, Canviro, decanted the samples eliminating any suspended particulate material in the groundwater sample. The new lab, Quanterra, followed the 8290 extraction protocol which combines the extract of the suspended particulate and the groundwater. The combined extract yielded higher levels of TCDD equivalents.

Results for dioxins and furans from the second groundwater sampling event were qualified as estimated because of missed holding times. Dioxins and furans are extremely stable compounds; it is highly unlikely that exceeding the holding times affected the results.

- Risk Considerations. Marland Dulaney stated that 3.4 ppt was calculated as the  $1 \times 10^{-6}$  cancer risk for soil. This value was calculated using standard EPA methodology and assuming that concrete ash is similar to surface soil, that residents live on the site, and that exposure only occurs on the land. The highest detected value for the ash was 6.93 ppt which corresponds to  $2 \times 10^{-6}$  lifetime cancer risk.
- Delisting Options. Marland Dulaney discussed several possible scenarios for the ash being delisted and for the ash not being delisted. If the ash is delisted, the site can be capped and (deed restricted) may be used for open storage by the Navy or the City of Gulfport. If the ash is not delisted, the ash can be stabilized, sent to a Subtitle C landfill, or left in place. Leaving the ash in place could require that the base obtain a Part B permit and undergo RFI/CMS processes under RCRA.

Onsite management of the delisted ash would allow for the site to remain under CERCLA, characterized as part of an IROD process, and

possibly capped. By capping the site, the dioxin will be made safer which, with the aid of the Restoration Advisory Board (RAB), may improve public relations.

- General Discussion. Jerry Banks explained that the state had only received delisting authority from the USEPA recently and that they did not have a complete record of previous events and correspondence. An action item was made to forward copies of correspondence and relevant information to the state.
- Basewide Surface Water and Sediment Data. Penny Baxter presented the dioxin and furan results from the basewide surface water and sediment sampling event. Dioxins and furans were detected in a sediment sample collected in the drainage area adjacent to 11th Street at a value of 150 ppt. One of the streams feeding into this surface drainage was traced back to the former HO storage area. This is a separate issue from the delisting of the ash; however, it may become a public concern because the dioxins and furans may be going off site. A road project is planned for this area and could begin in the very near future. Confirmatory sampling is planned for March 2 or 3, 1994.