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LETTER FROM U S AIR FORCE REGARDING HERBICIDE ORANGE INCINERATOR
PROJECT UPDATE NCBC GULFPORT MS
12/9/1987
U S AIR FORCE HEADQUARTERS



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC 20332-5000

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REPLY TO
ATTN OF: LEEV

SUBJECT: Herbicide Orange Incinerator Project Update

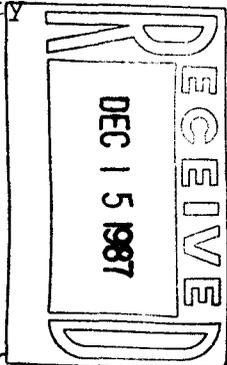
TO: Capt Q. E. D. Lewis
Commanding Officer
Naval Construction Battalion Center
Gulfport MS 39501-5000

1. The Air Force is currently conducting a full-scale field trial of a rotary-kiln incinerator at the Naval Construction Battalion Center, Gulfport MS. While this effort is classified as a research and development project, the ultimate goal is to complete site closure and return it to the Navy. The purpose of this letter is to update you on the status of this project and to make you aware of several Air Force concerns.

2. After experiencing almost ten months of delays from EPA in obtaining a final permit to burn, the incinerator was finally put into operation on 25 Nov 87. This was a historical moment for those contractor and Air Force personnel who worked so hard to make this moment happen. Now underway, it is our goal to operate the incinerator 24 hrs a day until all known soil contaminated above 1 ppb has been treated.

3. At present we still do not know the exact amount of soil that has been contaminated. The soil mapping project to determine the extent of contamination is still underway and our preliminary calculations indicate that we are going to exceed the 11,000 cu yds of soil as identified in our permit. EPA has verbally said that they would be willing to extend the quantity and time provisions of the permit to allow us to treat all of the contaminated soil. Extensions to the permit will require another public comment period. As soon as final numbers are known, EPA will be contacted with our request. We presently expect to burn approximately 15,000 cu yds of soil and to operate for some 300 days.

4. During a recent site visit to your installation, Capt Howell of my Environmental Operations office, had the opportunity to discuss the proposed siting of your new Hazardous Materials Storage Facility with Mr Jim Cluff of your environmental staff. We fully concur with your decision to relocate the facility away from the dioxin site. The old facility site was in an area that is still being evaluated for dioxin contamination. Continued sampling of this area has confirmed our previous concerns about scattered contamination, some of which fell within the construction limits of your proposed facility. Any construction in close proximity to a contaminated area could present significant problems to both our cleanup efforts and your proposed construction.



5. Official site closure is another issue that we have been addressing. Contact with state officials has indicated they are unsure of what requirements they will ask for in site closure. We intend to bring a contractor on board to work with both the state and EPA to develop a mutually acceptable package that will meet their requirements. As part of the closure plan the state will require a land management plan outlining the Navy's proposed use of the site. The state probably will limit the types of facilities that can be put in this area. We estimate that final approval of the site closure plan could take as long as 2 years to complete.

6. The Air Force is just as anxious to complete this project as you are; however, this is a very complicated process on the leading edge of technology with close monitoring by both the state and EPA. We are proceeding as fast as possible while still meeting regulatory requirements and our own R&D documentation. This effort is expected to exceed 20 million dollars before the Air Force can cleanup and close the site.

7. We need you and your staff's continued support to help us coordinate this complex effort with the regulators and complete this project as quickly as possible. If I can be of any assistance to you on this matter please call me at AUTOVON 297-4178.

FOR THE CHIEF OF STAFF



DONALD A. KANE, COL, USAF, BSC
Chief, Environmental Division
Directorate of Engr & Svcs

cc: HQ AFESC/RDV
HQ USAF/SGPA
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