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NCBC GULFPORT
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SITE CLOSURE MEETING MINUTES 24 JUNE 1988 SITE 8 NCBC GULFPORT MS
7/6/1988
IDAHO NATIONAL ENGINEERING LABORATORY



July 6, 1988

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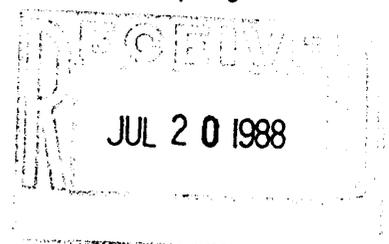
MINUTES OF INITIAL NCBC SITE CLOSURE MEETING - DJH-19-88

On June 24, 1988, a meeting was held at NCBC between representatives of the Navy, AFLEEVO, and EG&G Idaho to discuss plans and strategy for the submission of a site closure plan for the former Herbicide Orange storage area. This letter documents some of the important issues and decisions that were made. In attendance at the meeting were Mr. K. Kneeling (AFLEEVO), Mr. G. Benjock and Mr. J. H. Cluff (Naval Facilities, Southern Division), and C. E. Friedrich and myself of EG&G Idaho.

After much discussion it was apparent that the most prudent approach to site closure would be to use a CERCLA approach rather than a RCRA approach. The reasoning was that the former HO storage area was probably not classified as a solid waste management unit under RCRA and that the AF had been following its own Installation and Restoration Program (IRP) guidelines throughout the history of the project. Mr. Kneeling demonstrated that the IRP was the defense department's equivalent to CERCLA and thus we would have a strong case for a CERCLA-type closure. We discussed, but did not clearly resolve, whether to follow the Navy or the Air Force IRP guidelines for submission of a closure document; this remains an open item but needs no immediate resolution.

Early in the meeting, it was pointed out that closure was actually two distinct tasks. One task would be to satisfy all of the conditions specified in the RCRA RD&D permit, i.e., demobilization and permit closure. The other task would be formal site closure that, hopefully, would return site use to the Navy.

After additional discussion, we collectively laid out a strategy plan which is graphically described in the attachment. The ultimate goal of the site closure plan is to write a formal decision document that explains the rationale for each aspect of the project. The decision document would explain what prompted the Air Force to begin site investigation and their desire to obtain a remedial action data base that could be applied to other HO contaminated sites. The decision document would lead the reader through the historical aspects of the project and ultimately state that the site is clean and no additional work needs to be conducted to protect human health or the environment. The document would demonstrate the parallels between the military's IRP program and the EPA's CERCLA program.



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As part of the development of the decision document, EG&G will determine if any significant IRP or CERCLA steps were omitted during the course of the project and develop a general plan to fulfill the requirements of any omitted steps. After these two steps are completed, we agreed that we should then begin formal negotiations with EPA Region IV and state of Mississippi personnel to solicit their concurrence on the site closure plan. We further agreed that those negotiations should begin by late August so that some resolution concerning the site cleanup criteria could be determined before demobilization of the incinerator.

If you have any questions or suggestions concerning the site closure task, please call me at (208) 526-9959.



D. J. Haley
Sr. Programs Specialist
Hazardous Waste Projects

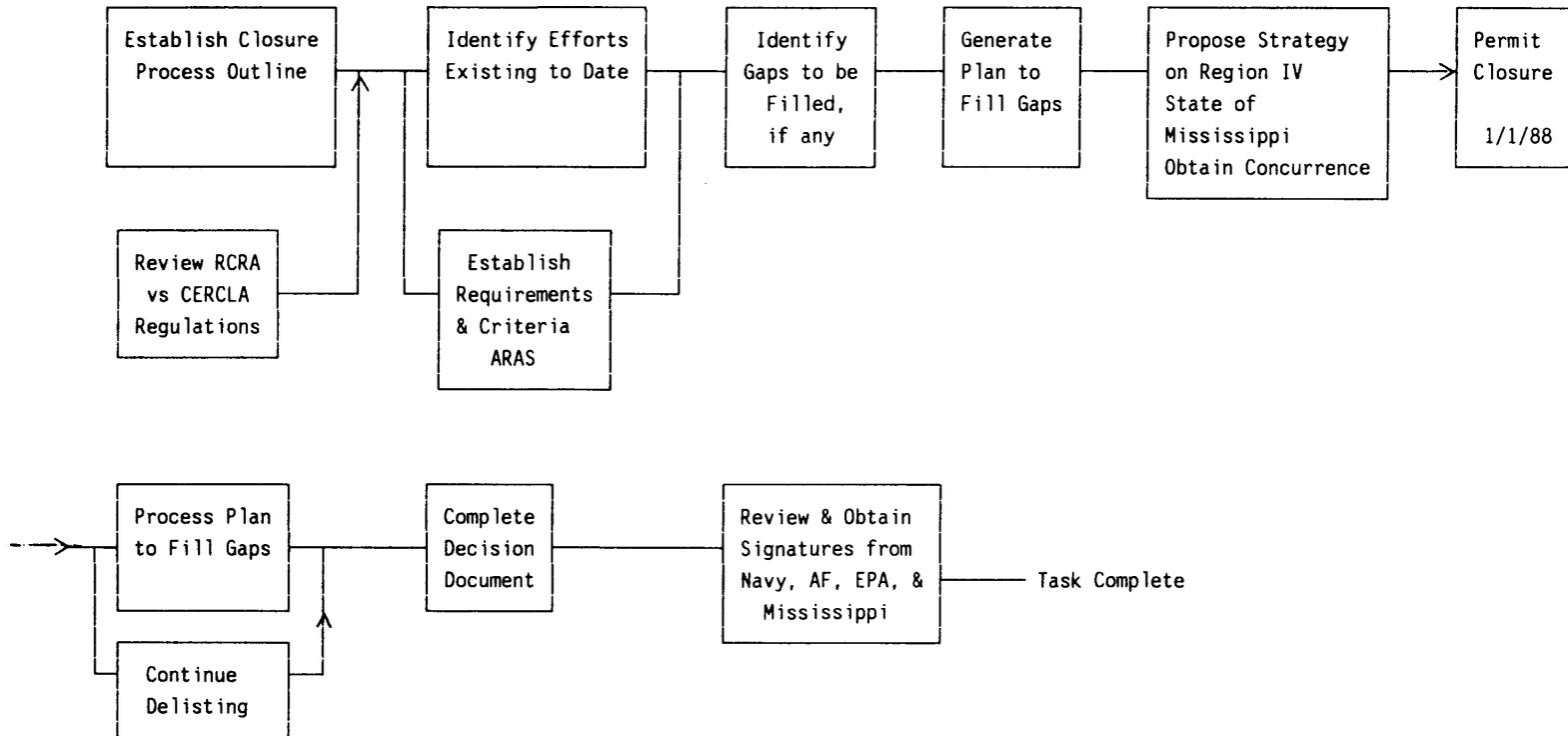
Attachment
As Stated

Distribution

G. Benjock, USN S. Div
J. H. Cluff, USN CDC
Maj. T. L. Stoddart, AFESC
K. Kneiling, HQ USAF LEEVO

cc: J. H. Nelson, EG&G Idaho
J. O. Zane, EG&G Idaho (w/o Attach)

NCBC SITE CLOSURE STRATEGY FLOW DIAGRAM



Task needed by late August 88

Bottom of hole sampling justification

S&A Plans

Statistical justification for 5 point composite & bottom of hole samples

* 1.0 ppb Criteria rational and justification

Missouri closure plans for examples

Final Draft Delisting Petition