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BUDGET AND STATUS REPORT FOR SITE CLOSURE SITE 8 NCBC GULFPORT MS
11/10/1988
IDAHO NATIONAL ENGINEERING LABORATORY



FILE 509015A
SITE TUESDAY

490 file

November 10, 1988

Captain C. R. Howell
HQ USAF/LEEVO
Bolling Air Force Base
Washington, D.C. 20332

BUDGET AND STATUS REPORT FOR NCBC SITE CLOSURE - DJH-27-88

Ref: Undine Johnson (MDNR) ltr to J. B. Malone (NAVFAC, South Division),
Draft Final Verification Report, Naval Construction Battalion Center,
Gulfport, Mississippi, March 4, 1988

Dear Captain Howell:

Attached for your information is the budget and status report for the NCBC Site Closure project. This report covers the activities for September and October, 1988

If you have any questions, please feel free to call me at (208) 526-9959.

Very truly yours,


Daniel J. Haley
Sr. Programs Specialist
Environmental Programs Management

Attachment:
As Stated

cc: J. J. Short, USAF/AFESC
J. H. Cluff, NCBC
J. H. Nelson, EG&G Idaho (w/o Attach)
J. O. Zane, EG&G Idaho (w/o Attach)

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NCBC SITE CLOSURE PROJECT
BUDGET AND STATUS REPORT
OCTOBER 31, 1988

1. Summary Status

A "white paper" was transmitted to HQ/LEEVO, NCBC Environmental Coordinator and NAVFAC South Division on September 9, 1988. Comments were received and incorporated. The final document is attached for your files.

EG&G Idaho, Inc., coordinated meetings between EPA Region IV and the State of Mississippi, Department of Natural Resources (MDNR), to discuss the proposed strategy for project termination and site disposition. The aforementioned white paper was presented and well received.

The meeting with EPA Region IV on October 19, 1988, was very cordial. Region IV agreed in principle to the project termination and site disposition plan proposed in the white paper and stated that they would not have direct involvement in the ensuing project termination activities. They deferred any action on the decision document and the RI/FS document to the State of Mississippi. Region IV, would, however, review and "informally approve" the decision document.

The meeting with the Mississippi DNR on October 18, 1988, was also very cordial. The Mississippi DNR agreed in principle to the proposed project termination under the IRP guidelines. Mr. Russell requested that a risk assessment be performed that follows the general guidelines of the Superfund Public Health Evaluation Manual. We agreed to investigate the need and applicability of a risk assessment.

During the meetings with the MDNR, post project groundwater monitoring was not discussed. However, on October 26, conversations between Mr. D. J. Haley (EG&G Idaho) and Mr. Steven Spengler (MDNR) indicated that the state was interested in groundwater monitoring per the reference in the letter. (Note, however, the reference does not include the former H0 storage area.) D. J. Haley indicated that the need for groundwater monitoring was not well founded and that a risk assessment may demonstrate that groundwater monitoring was unnecessary; Mr. Spengler concurred.

Therefore, EG&G Idaho has obtained the necessary guidance manuals and are determining if a simplified risk assessment can be conducted which can demonstrate that groundwater monitoring is unnecessary.

The work on the risk assessment is an addition to the present scope of work. The impact on the budget and schedule are being assessed and will be reported in the next status report. Reductions in other workscope, such as sampling and analysis, may cover the cost of a risk analysis.

2. Significant Accomplishments

A draft "white paper" describing the proposed project termination and site disposition strategy was sent to the Air Force and Navy on September 9 and 19, 1988, respectively. Comments were incorporated and the final white paper was presented to MDNR and EPA Region IV on October 18 and 19, respectively. These activities were completed ahead of the Program Management Plan (PMP) schedule.

3. Milestone Report

The milestones listed on page 4 of the PMP are inconsistent with the Gantt chart presented in Attachment II of the PMP. The dates presented in the Gantt chart are more realistic. The first milestone, submission of the white paper to the regulating agencies, was met ahead of schedule.

The impact of the additional scope of work for the risk analysis is being assessed. The schedule and milestones will be adjusted and reported by November 30. The next milestone, per the PMP Gantt schedule (delivery of a draft decision document), is scheduled for December 15, 1988.

4. Cost and Schedule Status

Tables 1 through 5 show the comprehensive budget status and individual MIPR status as of October 31, 1988. The funds spent in September and October were used for Tasks 705 through 755 of the Program Management Plan (PMP) in addition to the development of a detailed PMP which was transmitted to HQ/LEEVO on September 9, 1988.

Tasks 705 through 755 were budgeted as \$53,687. The actual cost for those tasks, which are now complete, is only \$28,182. The underrun was primarily due to efficiency of the performing engineers. Additionally, the work performed was not as complex as originally anticipated. The funds remaining from this variance will be applied towards the risk assessment.

Tasks 705 through 755 were completed on schedule. The remaining tasks, in addition to the risk analysis, are proceeding as scheduled.

Please note that the funds available in MIPR N8829 (Tyndall) as of August 31, 1988, were errantly reported in the previous budget report as \$124,990. The correct amount should have been \$106,779. The \$18K difference was used for site closure work performed prior to August 1988.

5. Problems/Recommendations

There are no significant problems to date. EG&G Idaho will revise the Program Management Plan schedule and work scope to include a risk analysis. The goal of that risk analysis will be to demonstrate that groundwater monitoring is unnecessary.

To assist EG&G Idaho in developing the decision document, we request that a copy of the draft RI/FS report for the NCBC Demo Projects managed by Oak Ridge National Laboratories (ORNL) be sent to us as soon as possible. A preliminary draft document would be sufficient for our use.

TABLE 1
 NCBC SITE CLOSURE PROJECT
 BUDGET REPORT
 REPORT DATE: 10-Nov-88

MIPR #	MIPR \$ AVAILABLE 8/31/88	SEPTEMBER CHARGES	FUNDS REMAINING FOR FY-89	OCTOBER CHARGES	FY-89 YTD CHARGES	FUNDS REMAINING TO COMPLETE
86112	\$10,678	\$10,678	\$0	\$0	\$0	\$0
86143	\$24,089	\$0	\$24,089	\$2,872	\$2,872	\$21,217
8776	\$44,696	\$0	\$44,696	\$894	\$894	\$43,802
N8829	\$106,779 *	\$3,979	\$102,800	\$5,321	\$5,321	\$97,479
TOTAL	\$186,242	\$14,657	\$171,585	\$9,087	\$9,087	\$162,498

* NOTE: MIPR funds available as of August 31, 1988 was errently reported in monthly report dated September 9, 1988. See text for additional details.

TABLE 2

MIPR DETAIL

MIPR #	CHARGE NUMBER	SEPTEMBER LABOR CHARGES	SEPT NON-LABOR CHARGES	OCT. LABOR CHARGES	OCT NON-LABOR CHARGES	TOTAL CHARGES
86112	823920000	\$12,600	(\$1,922)	\$0	\$0	\$10,678
TOTAL CHARGES		\$12,600	(\$1,922)	\$0	\$0	\$10,678
FUNDS AVAILABLE @ 8/31/88						\$10,678
FUNDS REMAINING IN MIPR 86112						\$0

TABLE 3

MIPR DETAIL

MIPR #	CHARGE NUMBER	SEPTEMBER LABOR CHARGES	SEPT NON-LABOR CHARGES	OCT. LABOR CHARGES	OCT NON-LABOR CHARGES	TOTAL CHARGES
86143	823920200	\$0	\$0	\$2,400	\$472	\$2,872
TOTAL CHARGES		\$0	\$0	\$2,400	\$472	\$2,872
FUNDS AVAILABLE @ 8/31/88						\$24,089
FUNDS REMAINING IN MIPR 86143						\$21,217

TABLE 4

MIPR DETAIL

MIPR #	CHARGE NUMBER	SEPTEMBER LABOR CHARGES	SEPT NON-LABOR CHARGES	OCT. LABOR CHARGES	OCT NON-LABOR CHARGES	TOTAL CHARGES
8774	823920600	\$0	\$0	\$0	\$894	\$894
	TOTAL CHARGES	\$0	\$0	\$0	\$894	\$894

FUNDS AVAILABLE @ 8/31/88 \$44,696

FUNDS REMAINING IN MIPR 8774 \$43,802

TABLE 5

MIPR DETAIL

MIPR #	CHARGE NUMBER	SEPTEMBER LABOR CHARGES	SEPT NON-LABOR CHARGES	OCT. LABOR CHARGES	OCT NON-LABOR CHARGES	TOTAL CHARGES
N8829	823921465	\$3,979	\$0	\$5,600	(\$279)	\$9,300
	TOTAL CHARGES	\$3,979	\$0	\$5,600	(\$279)	\$9,300

FUNDS AVAILABLE @ 8/31/88 \$106,779

FUNDS REMAINING IN MIPR N8829 \$97,479

NAVAL CONSTRUCTION BATTALION CENTER

HERBICIDE ORANGE CONTAMINATED SITE
REMEDICATION STRATEGY AND STATUS REPORT

Sponsored by

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

Presented to

US ENVIRONMENTAL PROTECTION AGENCY, REGION IV
and
MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

October 19, 1988

NCBC HO CONTAMINATED SITE REMEDIATION STRATEGY AND STATUS REPORT

Purpose

This paper identifies the major activities associated with completion of the Naval Construction Battalion Center (NCBC) Herbicide Orange (HO) site remediation. The intent of this review is to ensure that concerned parties have a common awareness of these planned activities and future projected use of the remediated site such that project completion and land disposition can proceed in an orderly and environmentally acceptable manner.

Background

Herbicide Orange, a defoliant used by the United States armed forces in southeast Asia during the Vietnam war, was stored at the NCBC in Gulfport, Mississippi until 1977. As a result of leaks and spills during storage, some of the soil at the site became contaminated with Herbicide Orange and 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD), an unwanted by-product found in HO.

In 1980, the Air Force Surgeon General proposed a research protocol to return HO contaminated sites to full and beneficial use. In 1978, the Air Force began characterizing the former HO storage site and investigating various methods to cost effectively remediate HO contaminated sites. In July 1985, the Navy formally placed the former HO storage area on the Naval Installation Restoration Program list of former hazardous waste disposal sites (site number 8).

Based on the results of laboratory tests and pilot scale studies at the former HO storage site, the Air Force decided to undertake a full scale demonstration program using high temperature incineration for treatment of HO contaminated soils. A rotary kiln incinerator was mobilized on site in the autumn of 1986 followed by two test burns, one in December 1986 and a trial burn in May, 1987 that demonstrated 99.9999% destruction and removal efficiency. A Research Development and Demonstration (RD&D) operating permit was granted by EPA Region IV on November 25, 1987. Routine operations began two days later and will be completed by late November, 1988.

Site Remediation Goal

The NCBC site remediation meets the Air Force and Navy objectives of returning the HO contaminated site to full and beneficial use through the Installation Restoration Program. Towards that end, a clean-up standard of 1.0 ppb dioxin was selected for this site. This level is consistent with the Centers for Disease Control dioxin risk assessment that identified 1.0 ppb dioxin in soil as an action level for residential areas and is significantly more conservative than the EPA target clean-up level of 20 ppb for contaminated nonresidential sites in Missouri.

Success of Site Remediation

All plots whose surface concentration exceeded 1.0 ppb of 2,3,7,8-TCDD will be excavated and processed in the incinerator. Each 20 ft by 20 ft plot will be excavated until sampling and analysis shows that the bottom of the hole is less than 1.0 ppb of 2,3,7,8 TCDD. To date 930 plots of the available 959 contaminated plots have been processed. The remaining contaminated plots will be processed by late November, 1988. The 1,335 uncontaminated plots (less than 1.0 ppb 2,3,7,8-TCDD) will not be excavated.

The ash residue resulting from incineration of soils is currently being stockpiled on site in accordance with the RD&D permit conditions. To date, monthly comprehensive analysis shows that all valid samples were free of 2,3,7,8-TCDD with detection limits in the low part per trillion range. A delisting petition has been written and will be submitted to the EPA Office of Solid Waste in early November, 1988. Based upon previous successful EPA delisting petitions and the cleanliness of the NCBC incinerator ash, we anticipate successful delisting.

Remaining Activities

As a consequence of the Air Force efforts, all soil contaminated at IRP site #8 will be remediated. The Navy, with support from the Air Force, will proceed with IRP documentation of the investigation and remedial action taken to date. That documentation will be consistent with the National Contingency Plan.

Additionally, the Air Force and Navy will jointly write a decision document consistent with the Navy's Installation Restoration Program. That document will demonstrate site cleanliness and demonstrate that no additional remedial action at the former H0 storage site is necessary.

Proposed Future Land Use

Upon agreement with a decision document which demonstrates that the area is no longer a threat to the public health and welfare or the environment, the Navy will proceed with a military construction project for construction of a warehouse and an open storage area for heavy equipment. Such use is consistent with the original objective of returning the site to full and beneficial use.