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NCBC GULFPORT
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LETTER REGARDING PROPOSED OUTLINE FOR HERBICIDE ORANGE SITE
DISPOSITION DECISION DOCUMENT NCBC GULFPORT MS
11/22/1988
IDAHO NATIONAL ENGINEERING LABORATORY



5090/5A
CLOSURE 11-F0

November 22, 1988

Captain C. R. Howell
HQ USAF/LEEVO
Bolling Air Force Base
Washington, DC 20332-5000

PROPOSED OUTLINE FOR NCBC HO SITE DISPOSITION DECISION DOCUMENT -
DJH-32-88

Reference: Superfund Public Health Evaluation Manual, Environmental
Protection Agency, Office of Emergency and Remedial Response,
EPA/540/1-86/060, Washington, D.C., October 1986

Dear Captain Howell:

Attached for your review and approval is a proposed outline for the NCBC HO site decision document. This outline includes a section that will summarize the risk assessment that the State of Mississippi DNR requested in the meeting on October 18, 1988. Please review the attached outline and return your comments to me. We began writing the decision document and will continue under the proposed outline until directed otherwise.

Currently, we are also working on a risk assessment that uses the guidelines presented in the reference above. Although that manual covers all potential exposure pathways, we intend to concentrate our efforts on the groundwater pathway. The other pathways, such as dermal and air, can be rationally dismissed using other EPA documentation and NCBC operational data.

As part of the risk analysis, the EG&G Idaho Environmental Science and Engineering Group has performed some simplified groundwater modeling. By using very conservative assumptions and existing data from the remediated site, their preliminary analysis shows that the predicted groundwater concentration is substantially below EPA's level of concern. We therefore believe that we can make substantive arguments for not performing additional groundwater monitoring.

This additional work for the risk analysis and associated groundwater monitoring is anticipated to cost approximately \$9600 (approximately 160 man-hours). The additional cost can easily be covered under the existing budget because we anticipate that additional analytical costs (tasks 800 through 825) will not be required.

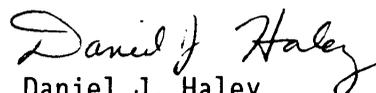
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It is unlikely that we will be able to transmit a draft decision document to you by December 15 as projected in the program management plan. We currently anticipate that the draft document can be transmitted to you by January 9, 1989. This schedule slip will be offset by shortening tasks 765, 795, 830, and 840 by a total of three weeks. The effect to the overall schedule will be minimal.

For your information, the delisting petition was formally submitted to EPA Office of Solid Waste on November 9, 1988. To date, we have received no comments. I will contact the reviewers after the Thanksgiving holiday to determine the status of the review.

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

Very truly yours



Daniel J. Haley
Senior Program Specialist
Environmental Program Management Group

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Attachments:
As Stated

cc: J. H. Cluff, NCBC
G. Horman, NCBC
J. Malone, NAVFAC SouthDiv
J. H. Nelson, EG&G Idaho (w/o Attach)
J. O. Zane, EG&G Idaho (w/o Attach)

OUTLINE

FINAL DECISION DOCUMENT FOR THE REMEDICATION OF SITE #8, FORMER HERBICIDE ORANGE STORAGE AREA AT THE NAVAL CONSTRUCTION BATTALION CENTER GULFPORT, MISSISSIPPI

I. Introduction

A. Background

Here we will use much of the same background statements and information that we have used in so many of our other documents.

B. Site History

As above we will use much of the same material used in many previous reports with an emphasis towards the IRP process. For example we will state that the site was placed on the Navy IR program as site number 8. We will also describe why the Air Force and Navy chose to remediate the site and the rationale for various commitments made by the Air Force and the Navy.

C. Scope of Remediation Needed.

This section would briefly describe the size of the site, the typical depth of contamination (hence the total volume of soil remediated), and the principle contaminants of concern.

II. Community Relations and Environmental Assessment

This section will describe the various meetings that we had with the local populace, the media, and government officials.

The purpose of this section is to demonstrate that we did not work in a vacuum and that we had strong support from everyone in the area. It will also demonstrate that we seriously considered other potential impacts to the environment.

III. Pre-Remediated Site Characterization

A. Contaminant of Concern

1. 2,3,7,8 TCDD
2. description and references of its alleged hazards

B. Size of Site

C. Soil Characterization Efforts and Data

1. soil characterization maps
2. the rationale for the small plot size
3. Briefly describe the sampling and analytical techniques with references to the complete, amended soil characterization report

IV. Description of Selected Remedial Action

Note: Each section in this chapter would include the rationale for choosing the particular method or technology for this remediation. The purpose is to demonstrate that the remedial action was well planned, organized and implemented.

A. Excavation Strategy

In this section, we would describe the rationale for excavating only plots in excess of 1.0 ppb. We would also describe the two excavation techniques, the dust abatement techniques, and the ambient air monitoring plan.

The purpose of this section is to demonstrate that we used modern equipment and did not spread the contamination to non-contaminated areas.

B. Incinerator Process Description

This section would briefly describe the rotary kiln incinerator and the operating conditions. Because most readers would already be knowledgeable about rotary kiln incineration, I recommend that we not go into much detail here. We can reference much of the details to other published or otherwise available documents.

C. Process Ash Disposition

This section would describe the ash handling, sampling, and disposal. We would summarize the delisting process and conclusions of the delisting petition.

V. Remediated Site Characteristics

Note: The purpose of this section is to demonstrate that the site is clean.

A. Process Ash

All remediated plots were treated to low parts per trillion levels. We would briefly describe the sampling and analytical techniques used; the analytical data and specific sampling techniques used can be referenced from the delisting petition or placed in an appendix.

B. Bottom-of-holes

Provide a listing showing that every excavated plot was left at 1.0 ppb or lower. We will also describe the analytical techniques used, the sampling techniques, data validation, and any statistical analyses used.

C. Non-remediated Plots

This section would describe the rationale for not remediating the plots whose 2378 TCDD concentration was less than 1.0 ppb. We will provide a listing and a map of the non-remediated plots. We would briefly describe the analytical and sampling methodologies used but refer the reader to the site characterization report for specific details.

D. Incinerator, Equipment, and Miscellaneous Debris

This section would be a short paragraph stating that the incinerator, all ancillary devices, excavation equipment, and miscellaneous debris was disposed, decontaminated, or re-used in accordance with applicable regulations.

VI. Remediated Site Risks

Note: This chapter will summarize the conclusions of the risk analysis that we are performing. The risk analysis will be issued as a separate report but could be an appendix to this document.

A. Groundwater

B. Air

C. Dermal and/or Direct Ingestion

D. Plant uptake

E. Surface Water

F. Comparison of NCBC risks with the risks of other, similar sites.

VII Conclusions and Recommendations

A. Conclusions

1. The site has been fully remediated.
2. There are no significant or measurable health risks to the public or to Navy personnel and lower 2378 TCDD levels are not technically or economically justified.
3. There is no technology currently available (or apparent in the near term future) that could remediate the site to lower 2378 TCDD levels.
4. All debris and equipment resulting from incineration (with the exception of process ash) has been removed from the site and no hazard exists from those materials.
5. Process ash is non-hazardous via delisting
6. NO FURTHER REMEDIATION IS NECESSARY

B. Recommendations

The site be returned to the Navy for non-residential use. The site may be used for equipment storage and/or construction of warehouses with no protective measures taken.

IV. Declaration and signatory

A. This section would be a brief declaration statement that states the the Navy and Air Force jointly agree that:

1. the site is remediated
2. no further remediation is necessary
3. the land may be returned to non-residential use
4. to the best knowlege of the signatories the data reported herin is true and accurate., i.e., a statement similar to the one normally required by 40 CFR 270.11(d)

B. Signatory of Air Force and Navy responsible officers