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NCBC GULFPORT
5090.3a

LETTER REGARDING HERBICIDE ORANGE SITE CLOSURE AND CLOSURE HISTORY
SITE 8 NCBC GULFPORT MS
3/1/1991
U S NAVY



DEPARTMENT OF THE NAVY

NAVAL CONSTRUCTION BATTALION CENTER

GULFPORT, MISSISSIPPI 39501-5000

IN REPLY REFER TO

5090

Ser 470.2/2524

1 March 1991

From: Commanding Officer, Naval Construction Battalion Center, Gulfport
To: Deputy Director, Directorate of Engineering and Services, HQ/USAF,
Bolling Air Force Base, Washington, DC 20332-5000
Via: Commander, Naval Facilities Engineering Command

Subj: HERBICIDE ORANGE SITE CLOSURE

1. During the Vietnam War, approximately 15,000 55-gallon drums of herbicide orange were stored on three adjoining sites, totalling 11 acres, at Naval Construction Battalion Center, Gulfport. Many of these drums leaked and contaminated the underlying cement stabilized soil. In 1979, the U.S. Air Force, Office of the Assistant Secretary, made a commitment to the Navy to return the former herbicide orange storage area to full and beneficial use. These sites are the best available locations for three warehouses planned for construction in the FY95 Military Construction Program.

2. The cleanup of these sites began in 1986 using an Air Force research and development project designed to demonstrate the reliability of rotary kiln incineration in removing dioxin from soil. Approximately 30,000 cubic yards of soil were removed from the sites and incinerated. The Air Force obtained a permit under the Resource Conservation and Recovery Act (RCRA) to carry out this operation. The incineration of the soil was completed in 1988 and the ash from the incineration was placed on Site "A", a 9-acre portion of the total area. Because the ash is considered a hazardous waste, the Environmental Protection Agency (EPA) required the Air Force to submit a delisting petition in accordance with RCRA, which would provide scientific evidence that the ash had been cleaned of all hazardous constituents. The delisting of the ash would allow it to remain on site and the entire area could be returned to beneficial use.

3. In 1989, the Air Force forwarded the delisting petition to EPA Region IV in Atlanta, EPA Headquarters in Washington, D.C., and the Mississippi Department of Environmental Quality (MSDEQ) for review and approval. The EPA provided a draft letter to your staff stating the delisting petition would be denied as it did not prove the ash is clean. Your staff is currently reviewing this letter. Over the past eighteen months, the Air Force; Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM); CBC Gulfport; the EPA and MSDEQ have been working to find a way to close Site "A". Both the EPA and MSDEQ have been patient with the Air Force and the Navy on this issue, but are now pushing us to complete this closure. The EPA and MSDEQ have stated that if the ash cannot be delisted, then we would be in violation of RCRA and could receive a Notice of Violation.

4. I request your immediate assistance in determining whether the delisting petition is viable. If the ash cannot be delisted, we ask that you support

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SOUTHNAVFACENGCOM in their efforts to achieve closure of site "A". In this era of increasing environmental concern and sensitivity, we are clearly interested in avoiding the receipt of a Notice of Violation for this area. My point of contact for additional information and discussion is Mr. Tom Sarros at AUTOVON 363-2484 or commercial (601) 865-2484. I may be reached at AUTOVON 363-2201 or commercial (601) 865-2201.



W. C. HILDERBRAND

Copy to:
COMNAVFACENGCOM (FAC 0653, FAC 018)
SOUTHNAVFACENGCOM (Code 1812)