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HERBICIDE ORANGE MEETING MINUTES 27 JUNE 1991 WITH TRANSMITTAL SITE 8  
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23 JUL 1991

From: Commanding Officer, Naval Construction Battalion Center, Gulfport  
To: Headquarters, U.S. Air Force, Bolling Air Force Base, Washington, DC  
20332-5000

Subj: HERBICIDE ORANGE MEETING OF 27 JUN 91

Encl: (1) Minutes of Subject Mtg

1. Enclosure (1) is forwarded for your information and review. If you have any questions or would like to discuss the minutes, please contact Mr. Tom Sarros at AUTOVON 868-2484.

Copy to:  
COMNAVFACENGCOM (FAC 065)  
SOUTHNAVFACENGCOM (Code 1812)

ccs  
7/12

## HERBICIDE ORANGE MEETING

27 JUNE 1991

Captain Hilderbrand welcomed everyone to the meeting and a general discussion was held concerning closure of the Herbicide Orange (HO) site.

The Air Force (AF) representatives stated that the AF had reviewed the petition and, in their opinion, it is valid both from the technical and from the legal aspect. An addendum report must be included which addresses the 1989 comments from the Environmental Protection Agency (EPA) and Mississippi Department of Environmental Quality (MSDEQ). The AF recommended that they, the Navy and Naval Construction Battalion Center (CBC), Gulfport, should pursue the petition. It is felt that the additional technical studies requested by both EPA and MSDEQ would add strength to the original delisting petition.

Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), stated that their Comprehensive Long-term Environmental Action, Navy (CLEAN) contractor had also reviewed the petition and the work plans and felt that both were good studies and should be pursued. SOUTHNAVFACENGCOM's contractor made several recommendations to strengthen the petition.

According to the AF and SOUTHNAVFACENGCOM, most of the work has been completed and only the additional studies are needed. Once these studies are carried out and the data provided to EPA and MSDEQ, it is felt the petition may be approved barring any unforeseen study results.

The AF representatives stated that they had been discussing the delisting petition with EPA headquarters and they were receptive. The problem has been with EPA Region IV in Atlanta. Region IV has been reluctant to act on the petition. However, EPA headquarters is more comfortable with the delisting petition process (having reviewed several since ours was submitted) and is willing to review the petition with the additional data to be provided by the soil and ground water studies.

It was decided to submit the soil and ground water sampling work plans in July 1991. Once these plans are approved by EPA and MSDEQ, the sampling work can be completed and the results forwarded to the regulators. It is estimated that the approval of the work plans and the completion of the sampling will take from six to twelve months. However, this depends on how long it takes the EPA to complete review of the work plans. It was also suggested that the Commanding Officer or the Executive Officer and the Environmental Specialist from CBC Gulfport visit both EPA and MSDEQ during the work plan review. It is felt that this visit may encourage the EPA and MSDEQ to proceed with the review faster.

Encl (1)



The plan of action agreed upon by all present is:

1. AF will forward completed work plans to CBC Gulfport (completed).
2. CBC Gulfport will forward them to EPA and MSDEQ July/August time frame (completed).
3. CO/XO may visit EPA/MSDEQ to "show flag" and try to speed up review of work plans.

NOTE: Per PHONCON T. Sarros (CBC Gulfport)/J. Hardage (MSDEQ) of 11 July 1991, DEQ should be able to review work plans in 30 to 60 days.

4. Once the work plans are approved, the work will be carried out by SOUTHNAVFACENCOM's CLEAN contractor; AF will fund work.
5. The AF agreed to prepare a letter to the EPA to define the steps that will be taken to finalize the delisting petition. This letter will include an estimated time frame for accomplishment of each step.
6. The priority of the work agreed upon at the meeting is:
  - a. Complete soil and ground water studies for B and C sites first. Included in this work will be data collection on site A.
  - b. Use the data to support the delisting petition. If petition passes, site A will be remediated under the CERCLA program.
  - c. If the petition fails, regroup and rethink the situation.

The meeting was adjourned.