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HERBICIDE ORANGE MEETING MINUTES 25 JULY 1991 WITH TRANSMITTAL NCBC
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Subj: HERBICIDE ORANGE MEETING HELD AT EPA HEADQUARTERS 25 JULY 1991

Encl: (1) Minutes of Subject Meeting

1. Enclosure (1) is forwarded for your information and use. The EPA appears to be more receptive to our delisting petition than they have been in the past. I forwarded our soil and groundwater sampling plans to EPA and MSDEQ last month and preliminary reports are that both agencies will review the plans and forward their comments back to us in 30 to 60 days. As stated in the minutes, another sampling plan will be generated by the AF to sample the ash. This plan should be completed near the end of August. Once all three sampling plans are approved, we can begin sampling. The AF will fund the sampling and SOUTHDIV's contractor will actually carry it out.

2. If you have any further questions or would like to discuss these issues, please call me at extension 2484.

TOM SARROS

HERBICIDE ORANGE MEETING
MINUTES OF 25 JULY 1991

The Herbicide Orange (HO) meeting opened with an introduction of all present. Mr. Jeff Short, from the Air Force Environmental Office, explained to the EPA representatives that the reason for the meeting was to answer any questions the EPA may have concerning the delisting petition and the clean up of the sites. Since these sites are not on the National Priorities List (NPL), he further explained why the Navy and the Air Force were "pushing" to get the sites back into productive use.

We discussed use of the sites and what would be done with the ash after it was delisted. I outlined the site characteristics and explained that all future use of the sites would be open storage or warehousing. The EPA representative asked what we would do with the ash if it was delisted. I explained that the plan was to place the ash back into the holes it came from and soil cement it in place. I further explained that warehouses at CBC Gulfport were built in slab above grade style. The void between the surface and the slab bottom is filled with soil. Any soil removed during construction of the warehouses would be used to help fill this void.

A general discussion then took place concerning the various testing methods and models used in the past and to be used in the future to determine if the ash could be delisted.

The EPA outlined a plan of action which they wanted to see concerning soil and groundwater sampling of all three sites and some additional sampling of the ash. This sampling will support the delisting petition as well as the closure of the sites. The plan is:

1. Draft a plan of action identifying what we intend to do at the site in support of the delisting petition, groundwater sampling, soil sampling, etc. The EPA will review this plan prior to work beginning.

2. The questions asked in their draft letter of 1990 need to be answered. This information would be considered a second addendum to the original delisting petition.

3. The EPA stated that they will consider closure of the sites and their future use during the delisting process. SOUTHDIV explained that the sites are a different issue than the ash. The sites are Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) sites and would be closed under the Navy's Installation Restoration Program, including site "A" where the ash is currently located. If the ash cannot be delisted, then the ash site might fall under the Resource Conservation and Recovery Act (RCRA) closure process and all other sites would become solid waste management units, but remediation is proceeding under the IRP.

4. Any constituents of concern which the EPA feels need to be sampled will be passed from EPA to the AF.

5. All testing wells used to sample groundwater must be constructed to RCRA well standards.

6. For all groundwater samples, use the PQL's from the new drinking water standards. Some sampling of the groundwater and the soil will have to occur to identify other constituents, such as heavy metals, and to insure there are no unknown materials in the ash. The sampling will support the delisting petition. Approximately 30 such samples will have to be taken and at least five of these should include testing for total dioxin. If the second set of samples meets the standards for dioxin safe limits, the results would "carry a lot of weight" towards delisting the ash.

7. The EPA stated that if we did not detect a specific material in the original sampling, we could be reasonably assured that this material is not present in the ash now. Therefore, sample for only those materials which were a concern in the original sampling, except as noted in paragraph 6 above.

8. We must do TCLP analysis for heavy metals to prove there are none present.

9. The EPA requested that we submit the sampling plan for the ash to them no later than the end of August or right after Labor Day. EPA stated they will need at least 30 days to review the plan and forward their comments back to the AF/Navy.

The EPA stated that after they receive all of the additional information requested, i.e., the second addendum report, it could take up to two years for them to make a decision on the delisting petition.

The meeting was adjourned.

The AF, SOUTHDIV and I feel that the EPA is receptive to delisting the ash if the additional sampling supports the delisting petition and no other constituents are found which were not in the original sampling. These additional constituents are the ones we will be sampling for in the soil, not the ash.