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NCBC GULFPORT
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MINUTES FROM 19 OCTOBER 1995 HERBICIDE ORANGE SITE A MEETING NCBC
GULFPORT MS
10/19/1995
ABB ENVIRONMENTAL

Meeting Minutes
 October 19, 1995
 Herbicide Orange Site A
 MSDEQ, Jackson, MS

Name	Company	Telephone
Jerry Banks	MSDEQ	601-961-5221
David Peacock	MSDEQ	601-961-5226
Philip Weathersby	MSDEQ	601-961-5302
Gordon Crane	NCBC Gulfport	601-871-2485
Dan Owens	SouthDiv	803-743-0331
Art Conrad	SouthDiv	803-743-0520
Luis A. Vazquez	SouthDiv	803-743-0613
Penny Baxter	ABB-ES	423-531-1922
Marland Dulaney	ABB-ES	904-656-1293
Robert Fisher	ABB-ES	423-531-1922

Date	12/4	# of pages	5
Post-it® Fax Note	7671	From	Jerry Banks
To	Gordon Crane	Co.	
Co./Dept.		Phone #	
		Phone #	
		Fax #	

NCBC Gulfport met with MSDEQ to discuss the current state of conditions at Site 8, former Herbicide Orange Storage Area, and to discuss the regulatory status of the site. Jerry Banks opened the meeting and introductory remarks were made by Dan Owens.

Bob Fisher presented the groundwater data from monitoring rounds 5 and 6. Data from round 5 suggested that dioxin was present in the unfiltered groundwater. Sampling round 6 showed little to no dioxins present. Unusually low water levels were present at the site during sampling round 6, suggesting that the dioxins were associated with the more near surface soils and not with the groundwater.

MSDEQ stated that the higher levels of dioxin in the groundwater, around 60 parts per quadrillion, were sufficient to deny delisting of the ash. Further, the fact that the ash is not currently leaching dioxin is not pertinent to the present status of the site. If the ash was considered to have contributed to dioxin in the groundwater at any time, then delisting is not viable. However, MSDEQ suggested that NCBC attempt to demonstrate that the ash had not impacted the groundwater. Recommendations to accomplish this task included analyzing the old soil sampling grids, assembling and comparing cleaned-up soil to ash data, comparison of water levels for various sampling rounds, and statistical analysis of upgradient and downgradient groundwater data. The advantages of installing another well upgradient was discussed and discarded because data from that well would not help to distinguish the contribution of dioxin-contaminated soil vs ash.

MSDEQ stated that EPA had turned all responsibility for delisting over to the State and that the State would be making the decision based on regulatory constraints and supplied data. MSDEQ stated that the area of delisting did not always present black and white choices. NCBC needs to prove that the ash never contributed to contamination at the site.

A discussion was held about the current state of the ash. Mr. Crane suggested that something should be done to stabilize the ash such as hydromulching. MSDEQ

did not find this solution acceptable and suggested consolidation and covering. The group recognized that offsite disposal was not a economically viable option and discussed the potential of capping the site. MSDEQ suggested that the risk of both options be considered and presented. MSDEQ stated that contaminated sediment in the ditches could be returned to Site 8.

The suggestion was made to MSDEQ that an agreement could be made between MSDEQ and NCBC to delist with conditional actions. That is, if the ash was delisted the Base would agree to cap the site and contain the ash. MSDEQ rejected this suggestion because of concerns about post closure maintenance. Mr. Peacock did state that MSDEQ would be willing to look at a plan of this nature. Similarly, MSDEQ rejected the idea of utilizing a brownfield-to-greenfield concept for Site 8 because of ongoing liability issues for the property.

MSDEQ expressed their intent to gather independent samples from the 28th Street offsite areas. These areas will include the Canal No. 1 for 200-300 feet north of the Base and the 28th Street swamp area. Approximately 10-20 samples will be collected for dioxin analyses. No biota samples are planned. Results of the samples are expected during the first of the year. It was suggested that a public meeting will be held by MSDEQ to discuss the findings with the community. The group discussed the possibility of Bob Fisher participating in the collection of the samples and possibly collecting sample splits at that time.

MSDEQ stated the intent to issue a draft consent order to NCBC Gulfport. Gordon Crane inquired about the status of Site 8, Areas B and C. Areas B and C will become Solid Waste Management Units (SWMUs) if the ash is not delisted. As SWMUs these areas will require an investigation prior to capping. A formal Corrective Measures Study will be required. The draft order will include both onsite and offsite areas of concern, groundwater monitoring, long term onsite and offsite sediment monitoring, and intakes of dioxin versus health assessment. The whole base is covered in the order.

David Peacock stated that the delisting decision would be finalized in the near future. He was interested in seeing Technical Memorandum No. 6; his intent was then to issue a letter denying the delisting petition and explaining options on how to proceed. Jerry Banks stated that NCBC needed to propose how they intended to proceed with the sites. This proposal could include transporting contaminated sediment back to the site. NCBC will need to pay special attention to HSWA directions per EPA Region IV regulations.

Gordon Crane asked for a walk through of the RCRA process. For a Part B permit, the facility has 180 days to respond with the application; the review process then takes 180 days. Notice of deficiencies are issued and responded to until the Part B permit no longer has NODs and is complete with closure and post closure plans. At that time a public notice is issued followed by a 45 day response period. Upon completion of the public review, the permit is approved. The draft order to be issued will be negotiated with the Base and an "agreed order" will be issued. The agreed order will be sent to both NCBC and the Air Force. If the Air Force does not respond, it will be issued an exparte order. MSDEQ expected to issue the draft order in November and to finalize negotiations in the new year.