

N62604.AR.001790
NCBC GULFPORT
5090.3a

THREE SCENARIOS FOR REGAINING BENEFICIAL USE OF DIOXIN SITE A NCBC
GULFPORT MS
12/1/1990
NCBC GULFPORT

THREE SCENARIOS FOR REGAINING BENEFICIAL USE OF DIOXIN SITE A

Under the first two scenarios, it is assumed that sites B and C will be characterized and remediated under the CERCLA program. Under the third scenario, sites B and C will be declared SWMUs and be investigated under RCRA.

A. FIRST SCENARIO - DELISTING PETITION

1. A delisting petition for the ash pile on site A has been submitted to the EPA
2. If delisting petition was successful, ash would be declared non-hazardous and use of property would be allowed pending groundwater investigation for other hazardous constituents
3. Draft comments on the delisting petition have been received
 - a. Can the comments be effectively responded to in view of technical considerations and the informal promise to deny the delisting petition?
4. Estimated costs and manpower requirements of delisting petition
 - a. Administrative costs and manpower associated with pursuing the delisting petition compared to the other two scenarios are minimal. The Air Force has provided the bulk of the work in preparing the petition and if accepted will require no further action other than groundwater investigations
 - b. Groundwater investigation could exceed \$200,000. No additional manpower should be required by the activity
5. Estimated time frame
 - a. The time frame to regain usefulness of Site A under this scenario will depend on the responsiveness of the EPA to the delisting petition and the groundwater investigation
 - b. Groundwater investigations are currently scheduled and budgeted for fourth quarter of FY-91

B. SECOND SCENARIO - RCRA RISK BASED CLEAN CLOSURE

1. If the delisting petition is denied or withdrawn, RCRA risk based clean closure is an alternate scenario

2. RCRA risk based clean closure would not require a RCRA closure permit. It would, however, require that the ash be removed from the site and disposed of as a hazardous waste

3. If attainable, clean closure would avoid RCRA Part B/HSWA permitting requirements

4. Based on current agreements with the EPA, RCRA groundwater investigations are acceptable for CERCLA

5. Clean closure would require groundwater and soil testing to prove that there is no risk to human health or the environment

6. Estimated costs and manpower requirements for RCRA risk based clean closure

a. Costs for transporting and disposing of the ash could exceed \$20,000,000, but would not require any additional manpower at the activity level

b. Costs for conducting groundwater testing could exceed \$500,000, but would not require any additional manpower at the activity level

7. Estimated time frame for RCRA risk based clean closure

a. Site could be returned to use in two to three years dependent upon the receptiveness of EPA/MSDEQ in reviewing submittals

C. THIRD SCENARIO - RCRA PART B POST-CLOSURE/HSWA PERMIT

1. If delisting is denied or withdrawn and clean closure is unattainable, Post-Closure/HSWA Permit is the final scenario

2. Would require the preparation of a Part B permit application

3. Would require that a RCRA Facility Assessment (RFA) be conducted by the EPA which could identify hundreds of Solid Waste Management Units (SWMUs). Characterization and remediation of these SWMUs could require several years of studies under both RCRA and CERCLA

4. Would require construction of a RCRA landfill on site to store the ash forever, but this would limit potential use of the site. Site use would have to be negotiated with MSDEQ

5. Estimated costs and manpower requirements for RCRA Part B Post-Closure/HSWA Permit

a. Costs of constructing a RCRA landfill and storing the ash on site could exceed \$5,000,000

b. Costs for conducting studies on SWMUs after EPA conducts the RFA could exceed \$2,000,000, and could require additional station manpower and/or funds for monitoring and permit submittals

c. Costs for long term monitoring could exceed \$15,000,000

6. Estimated time frame

a. Under the Post-Closure/HSWA Permit scenario, the site has the potential to never be returned to beneficial use

START

* FIGHT DELISTING PETITION *

PASS

* SITE A IS NO LONGER A *
* RCRA SITE *

FAIL

* ASH IS A HAZARDOUS WASTE. PREPARE A *
* CLOSURE PLAN AND TRY FOR RCRA RISK- *
* BASED CLOSURE *

FAIL

PASS

* CERTIFICATION OF CLEAN CLOSURE *

DENIED

GRANTED

* SITE A IS NO LONGER A RCRA SITE *

* OBTAIN RCRA PART B *
* POST-CLOSURE/HSWA *
* PERMIT *
