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NCBC GULFPORT
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LETTER REGARDING COORDINATION BETWEEN U S EPA AND U S AIR FORCE TO
EXEMPT PARTICULAR LISTED HAZARDOUS WASTES TREATED BY INCINERATION
NCBC GULFPORT MS
7/22/1991
DEPARTMENT OF THE AIR FORCE

39501-SITE 8 INCINERATION

19.01.08.0015

19.1.8.15



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC
20332-5000

Office of Solid Waste
OS-333
Attn: Mr. Robert Kayser
401 M. St. SW
Washington, D.C.

22 JUL 1991

Dear Mr. Kayser,

The purpose of this letter is to begin the necessary coordination between the Environmental Protection Agency and the Air Force, acting on its own behalf and on behalf of the Navy, to exempt the particular listed hazardous wastes; i.e., soils, treated by incineration at the Naval Construction Battalion Center (NCBC), Gulfport, Mississippi. At the conclusion of this coordination process, the Air Force intends to formally request that the Administrator again consider and issue a formal decision on the petition, to exempt ("delist") those particular wastes pursuant to the provisions of 40 CFR, 620.120 and 620.122. This letter follows the informal discussions you have had with Air Force representatives in June, 1991.

In November, 1988 the Air Force formally submitted the "delisting" petition which was supplemented by an addendum in April, 1989. SAIC, the EPA contractor who reviewed the petition, drafted a response letter in April, 1989. Since then, representatives from the Air Force, Navy, EPA Region IV and the State of Mississippi have met several times to discuss final site use and site closeout issues; each time, we discussed the progress of the delisting petition. Final disposition of the treated soil will determine site use and closure options.

As part of the site evaluation process, the Air Force and Navy will conduct additional sampling and analyses of both the untreated soil and underlying groundwater to ensure no hazardous substances remain. That sampling and analyses plan is now being reviewed by EPA IV and Mississippi. Once approved, we plan to start sampling in early FY 92. This data can also provide supporting information for "delisting".

The Navy desires to return the part of the NCBC which is both designated as a "site" and covered with the particular "ash" to beneficial use. Specifically, the Navy wishes to build a series of warehouses to store and protect heavy equipment which will be emplaced at NCBC. The Navy has requested the Air Force to seek resolution of the delisting issue. Exemption of the treated soil is the most cost-effective and expedient means for the Navy to regain use of the site.

We want to be sure the additional data is useful and sufficient for the EPA to make a final decision on the petition. Our earlier meetings indicated the following information would be helpful to evaluate the delisting petition:

- (1) Toxic characteristic leachate procedure (TCLP) analysis of the ash;
- (2) At least four analyses of groundwater taken over a 6-9 month period;
- (3) A sampling and analysis plan to achieve the above;
- (4) Address any other EPA questions about the delisting petition.

A meeting with your staff is now scheduled for 1:30 p.m. on July 25, 1991 to discuss specific requirements (analytical protocols, number of samples, etc.) to advance the delisting petition. Attachment 1 provides a proposed agenda for discussion. We plan to have a draft sampling and analysis plan for your review by August 30, 1991. Please contact Mr Short at (202) 767-0276 if you have any questions.

Curtis M. Bowling

CURTIS M. BOWLING, GM-15
Deputy Director of Env. Quality
Office of The Civil Engineer

1 Atch
Proposed approach

cc:
Commander, NCBC
NAVFAC, SouthDiv
HQ NAVFAC
HQ AFESC/RDV
Jim Cook, EG&G Idaho
Steve Schwartz, Versar

22 JUL 1991

MEMORANDUM FOR RECORD

Subj: Proposed Approach to Collect Supplemental Information to Revive Delisting Petition for the Treated Soil at the Naval Construction Battalion Center, Gulfport, Mississippi

1. BACKGROUND. This proposal is to provide sufficient additional information pursuant to Air Force actions to "delist" the treated soil at the Naval Construction Battalion Center (NCBC) from hazardous waste status. This soil was treated by incineration during the period November 1986 - November 1988 to remove contaminants associated with Herbicide Orange.

a. The treated soil is stored on site, above ground in hundreds of 15-20 cubic yard "piles". Also, one large (estimated at several hundred cubic yards) pile of treated soil is located centrally in the northernmost area (Area "A").

b. Access to the site is controlled by chain-link fence and Navy security patrols.

2. PURPOSE: To "revive" the delisting petition, submitted in Nov 88 and addended in Apr 89. The Air Force intends to further supplement the existing petition to "delist" the waste by following established procedures to conduct sampling and analysis of the treated soil to ensure no hazardous by-products remain nor are transported thereby endangering the environment or adversely affecting the health and safety of people.

3. APPROACH: The following approach is proposed as acceptable based on information contained in recent proposals to regulate:

a. Disposal of sludge from paper mills (56 FR 21802, May 10, 1991); and,

b. Synthetic organic and inorganic chemicals in primary and secondary drinking water (55 FR 30370, July 25, 1990).

4. METHODOLOGY: The Air Force will prepare a "delisting" sampling and analysis plan for the HQ EPA review by 30 Aug 91. The plan will be prepared as a supplement to the existing untreated soil and groundwater sampling plan prepared by Versar, Inc. and undergoing review by EPA IV and Mississippi. The plan will describe procedures to collect ash and groundwater samples at NCBC.

a. Thirty additional samples of ash will be collected from the piles of treated soil at NCBC. Twenty five samples will be taken randomly from the small piles and five samples taken randomly around the perimeter of the large pile.

b. One sample will be composed of four composite "scoops" of ash taken at 3-6 inches from the surface separated by at least three feet.

c. The ash material will be sifted to remove large chunks, and placed in containers, labelled and shipped to the Navy contractor's analytic laboratory. The analytic laboratory will analyze the ash samples according to the current protocols for Toxic Characteristic Leachate Procedure (TCLP) for the constituents of concern (Atch 1). Practical quantitation limits (PQLs) must be less than or equal to 10 ppt for 2,3,7,8 TCDD using high resolution GC/MS analytical procedures. PQLs for other organics/inorganics must be less than or equal to those prescribed in reference 3b above or 10 times the achievable method detection limit (MDL), whichever appropriate.

d. The groundwater samples taken to support the final site closeout decisions will also be analyzed for selected, possible contaminants to support the delisting petition. Four such samples will be collected over a six month period, i.e., one every 45 days. Practical quantitation limits must be less than or equal to 0.05 ppt for 2,3,7,8 TCDD using high resolution GC/MS analytical procedures. PQLs for other organics/inorganics must be less than or equal to those prescribed in reference 3b above or 10 times the achievable method detection limit (MDL), whichever appropriate.

5. REPORTING: Final results will be sent as a further supplement to the delisting petition and will be referred to in the formal letter to the EPA Administrator to support the decision to "delist" the treated soil at NCBC.

Jeffrey J. Short

JEFFREY J. SHORT, DAF
Project Officer

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Analytic protocols

Attachment 1. ANALYTICAL PROTOCOLS FOR CONSTITUENTS OF CONCERN

CLASS Analyte	ANALYTICAL METHOD	DETECTION LIMIT (ppt)
POLYNUCLEAR AROMATIC HYDROCARBONS	1311 (TCLP)	
Fluoranthene	8310	*
Benzo(a)anthracene	8310	0.02
Chrysene	8310	0.02
Benzo(b)fluoranthene	8310	0.02
Dibenzo (a,h) anthracene	8310	0.03
Indeno (123-c,d) pyrene	8310	0.04
DIOXINS/FURANS	1311 (TCLP)	
Total Tetrachlorodibenzo-p-dioxin	8290	*
2,3,7,8-Tetrachlorodibenzo-p-dioxin	8290	0.00001
Total Tetrachlorodibenzofurans	8290	*
2,3,7,8-Tetrachlorodibenzofuran	8290	*

* See Text