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NCBC GULFPORT
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LETTER REGARDING STATUS OF PETITION TO DELIST THE INCINERATOR ASH AT THE
HERBICIDE ORANGE SITE NCBC GULFPORT MS
9/10/1992
NAVFAC SOUTHERN DIVISION



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

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NCBC Gulfport Administrative Record
Document Index Number

39501-SITE 8 INCINERATION

19.01.08.0016

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Code 18210

From: Commanding Officer, Southern Division, Naval Facilities Engineering Command
To: Chief of Naval Operations (N-45)
Via: Commander, Naval Facilities Engineering Command
Subj: HERBICIDE ORANGE SITE, AREA A, NAVAL CONSTRUCTION BATTALION CENTER (NCBC) GULFPORT
Ref: (a) Message 301300Z Jan 92
Encl: (1) Photographs of Subject Site

1. NCBC Gulfport is currently out of compliance at the subject site because the Air Force has not actively pursued the petition to delist the incinerator ash at the site. The ash, FO28 listed hazardous waste until and unless delisted, is piled on Area A in waste piles that do not meet all of the requirements for permitted waste piles specified in 40 CFR 264. In addition NCBC is unable to use 13 acres of real estate because the Air Force has not remediated the dioxin contaminated soil on sites A, B, and C to the satisfaction of EPA Region IV and the Mississippi Department of Environmental Quality (MSDEQ). MSDEQ expressed concern with the lack of progress on sampling and monitoring the ash and groundwater on the sites during a meeting at NCBC on 10 September, 1992. We request that you pursue one of two options. Option one is to persuade the Air Force to take an active lead to accomplish the delisting petition/site closure efforts to return the site to beneficial use. Option two is to reach an agreement with the Air Force to allow the Navy to pursue the delisting/site closure efforts using Air Force funding. This process should be conducted in a timely manner to prevent enforcement action by MSDEQ or EPA Region IV. A brief discussion of the history of the site and possible options for the site follow.

2. The subject site was used for long-term storage of herbicide orange between 1970 and 1977. In addition, Areas B and C were used for short-term storage of herbicide orange during the 1960's. The drums used for storage leaked and contaminated much of the soil on all three areas. The contaminated soil from all three areas was excavated and thermally treated by the Air Force in Area A using a mobile incinerator. The treated soil (ash), designated as RCRA FO28 listed hazardous waste, was placed in approximately 200 piles in Area A. A petition to delist the waste

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was prepared by the Air Force's contractor based on analyses of the ash exiting the incinerator. The petition was presented to EPA headquarters by the Air Force in 1988 with an addendum presented in 1989. In 1989 EPA headquarters prepared a draft denial letter to the Air Force in response to the delisting petition based on disputes of the analysis of several ash samples. Per an EPA request the Air Force prepared a work plan to perform additional random ash sampling and ground-water sampling to provide support for the delisting effort. The EPA responded with comments on the work plan. As a result of these comments and the lack of a action by the Air Force, SOUTHDIV prepared Ref (a) requesting a timeframe for revising the workplan for resubmittal to EPA. The Air Force did not respond to Ref (a). SOUTHDIV then arranged a meeting with the Air Force and CBC Gulfport on 7 April, 1992 to discuss the status of the workplans. During this meeting the Air Force indicated that due to staffing and contractual limitations they were not able to continue supporting the effort to delist the ash at CBC.

3. Enclosure (1) shows the current waste management situation at the subject site. The current situation is that the ash, FO28 listed hazardous waste until and unless delisted, is piled on Area A in waste piles that do not meet all of the requirements for permitted waste piles specified in 40 CFR 264. This improper management of the waste could result in enforcement action by the Mississippi Department of Environmental Quality (MSDEQ) or EPA Region IV. The potential fines for the improper management of this waste are in excess of \$50 million, and the site would still require RCRA closure. RCRA closure could be obtained through either Clean Closure or by RCRA Part B Post-Closure Permit. Clean Closure would require that the ash, and potentially the contaminated soil on Areas A, B, and C, be transported to a permitted disposal facility. The ground-water would also have to be tested to prove that it is not contaminated as a result of operation of the unit. It is estimated that Clean Closure could cost in excess of \$20 million. If Clean Closure is not obtainable then the only remaining option is RCRA Part B Post-Closure/HSWA Permit. This option will require that a landfill be constructed on-site to contain the waste, that a ground-water monitoring system be installed and monitored for thirty years, and that all Solid Waste Management Units (SWMUs) throughout the base be identified and remediated as necessary. This option could cost in excess of \$10 million, and the site may never be returned to beneficial use.

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4. We request your support towards reaching agreement with the Air Force so that we may actively pursue resolution of this matter. Point of contact is Mr. Dan Owens at DSN 563-0331 or commercial (803) 743-0331.

Copy to:
CBC Gulfport

Gordon,
Give me a call and lets discuss.

Dan

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 4 3
To Gordon Crane	From Dan Owens	
Co. CBC Gulfport	Co. SODIV	
Dept.	Phone # AV 563-0331	
Fax # AV 868-2691	Fax # AV 563-0465	