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POINT PAPER ON THE HERBICIDE ORANGE CONTAMINATED SITE NCBC GULFPORT MS
10/30/1990
DEPARTMENT OF THE AIR FORCE

Point Paper
on
Herbicide Orange (HO) Contaminated Site
Naval Construction Battalion Center
Gulfport, MS.

PURPOSE

- To provide background information and status of the Air Force efforts to close out the Herbicide Orange Site at Gulfport MS.

DISCUSSION

- There are two basic issues remaining in the efforts to finish the cleanup of the Herbicide Orange Site (HO) at Gulfport MS.
 1. Conclude the "delisting" of the incinerated soil from hazardous waste status and allow the soil (ash) to remain on-site.
 2. Complete the IRP documentation of the HO site through additional sampling of the bottoms of the excavated plots and the groundwater. In addition, a CERCLA-based risk assessment posed by the remediated site will be prepared.
- With regard to the characteristics of the incinerated soil (ash), the Air Force treated approximately 15,000 cu. yds of soil excavated from a grid of plots with dioxin contamination of at least 1 part per billion (ppb). Total costs to date approx. \$20M.
 - Incineration was conducted under a RCRA Research, Development and Demonstration (RD&D) permit with EPA Region IV.
 - Full-scale incineration operations were concluded in November 1988 with the incinerator disassembled and transported off-site in February 1989.
- Under RCRA EPA considers any incinerated residue of this type to continue to be hazardous waste. The best option available to allow for the treated soil to remain on-site is to formally "delist" the treated soil.
 - A "delisting" petition was submitted to HQ EPA in November 1988.
 - EPA IV and State of Mississippi appeared to concur with our petition.
 - EPA Headquarters, however, reviewed the petition and have indicated informally that it will not grant the delisting.

- This is due in part by EPA's revision of the waste transport simulation model which set the maximum allowable concentration of dioxin at 0.499 parts per trillion (ppt).
- Of the 36 samples submitted in support of the delisting petition, none showed any measurable TCDD equivalent higher than 15 ppt, the practical quantitation limits (PQLs) published in the Federal Register. Based on superior analytical capability of the AF contract laboratories, HQ EPA stringently applied lower PQLs which means that about one-third of the samples would fail the delisting criteria.
- EPA has not acted formally on the delisting petition. No written determination has been made by either EPA HQ or EPA IV.
- EPA IV has indicated at meetings and conference calls that the Air Force should withdraw its petition. If we withdraw, they would consider the handling of the incinerated soil through the use of a risk assessment, if amenable to the State of Mississippi. They indicated if the ash and the site as a whole posed a total risk to health of less than 1 in a million, the ash could be left on-site. This has not been substantiated in writing by EPA IV.
- However, both the state and EPA IV have threatened to envelope the rest of the base (NCBC) under RCRA solid waste management unit corrective action requirements because they saw no way to allow for clean closure of the site as long as the ash was still a hazardous waste. This is the dilemma caused by the RCRA process.
- The Air Force position, based on the strength of the technical efforts in remediating the soil and on advice from our legal staff, is that we will not withdraw the petition. It's our trump card, preventing EPA and the state from imposing additional costly RCRA requirements.
- The Second issue - close out of the site under the IRP program.
 - EPA IV commented on the draft decision document for the HO site, requesting that additional sampling be conducted on the remediated plots on-site and that the groundwater be sampled for existence of any dioxin leachate.
 - In March 1990 AF/LEEV advised EPA IV of what additional work would be done at the site as part of the Navy's IRP activities at NCBC. We also noted that corrections would be made in the draft decision document for the site.

- Response to the questions concerning the risk assessment are complete
- Navy agreed to accept any future work at the site as part of their IRP. Air Force would provide technical assistance to the Navy as necessary. The scope of the efforts and a draft sampling and analysis plan will be available for regulatory review and comment in September.
- A draft scope of work for the investigation of the soil and groundwater has been prepared.
- Work on-site is expected to commence in early FY-91.

RECOMMENDATION

- HQ EPA should furnish the AF with a formal response to the delisting petition.
- Site closeout should proceed after completion of the additional sampling requested by EPA IV and Mississippi.
- Air Force will provide funds and technical expertise to finalize site disposition activities

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