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NCBC GULFPORT
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MINUTES FROM 6 JANUARY 1995 TELECONFERENCE ON THE DELISTING OF THE
HERBICIDE ORANGE SITE NCBC GULFPORT MS
1/6/1995
NAVFAC SOUTHERN DIVISION

39501-SITE 8 INCINERATION
19.01.08.0023

MEMORANDUM

TO: Baker Mordecai

COPIES: Philip Stapleton, Gordon Crane,
Kate Kelly, Marland Dulaney

FROM: Penny Baxter

DATE: January 6, 1995

SUBJECT: Teleconference on 1-6-95

PROJECT: Gulfport Herbicide Orange delisting

19.1.8.23

A teleconference was held at 10 am on January 6, 1995 to discuss plans for the delisting effort for Site 8. Much of the discussion centered around the November 30, 1994 letter sent by Philip about deleting use of the CML model and utilizing the EPA input-output table. Listed below are some thoughts coming out of the discussion.

- SouthDiv wants the Gulfport team to be proactive in pursuing the delisting of the ash. To that end, the Addendum report should include a health-based standard for EPA's consideration. We will do this even though the EPA is currently advancing more stringent levels than previously. The team will request a meeting with Narendra Chaudri, or the appropriate person at Headquarters, to discuss the report data. It was Philip's belief that the petition may still take a considerable amount of time for action to be taken.
- The input-output table can be used instead of the CML in the addendum report to provide the dilution-attenuation factor. The approach will be to use the table and assume a volume of ash at 1/20 of the actual volume. EPA will still do their own characterization. For the CML the EPA assumes 500 ft downgradient to be the compliance point. The only site specific data EPA utilizes is waste volume and leachate concentration.
- The question of air and storm water runoff is still unanswered. There is currently no control. We do not know if EPA will bring up these pathways or not.
- It was agreed that if the report includes a proposal for the ultimate fate of the ash, EPA will have more incentive to delist. However, it is uncertain if EPA can be persuaded to accelerate a decision. The process may still take EPA two years to render a determination.

- It was not felt that EPA would impose more stringent requirements for public participation. Some discussion will probably take place with the RAB on the activities associated with the ash.
- The hazardous waste ID rule may (eventually) provide levels for listed waste and may be an alternate to delisting for some cases.
- John Gordon has 1-2 sites that contain dioxin and may have thoughts on how to handle our data. Philip will bring any dioxin site information he can find to the meeting on January 19 in Tallahassee.