

N62604.AR.001808  
NCBC GULFPORT  
5090.3a

LETTER REGARDING RESOLUTION OF PERMIT REQUIREMENTS FOR TREATMENT OF  
ASH PILES AT THE HERBICIDE ORANGE SITE NCBC GULFPORT MS  
12/10/1992  
NCBC GULFPORT

39501-SITE 8 INCINERATION  
19.02.08.0004

DEPARTMENT OF THE NAVY  
NAVAL CONSTRUCTION BATTALION CENTER  
GULFPORT, MISSISSIPPI 39501-5000

IN REPLY REFER TO

5090/5/0032T  
Ser 470.2/2225  
1 0 DEC 1992

From: Commanding Officer, Naval Construction Battalion Center, Gulfport  
To: Chief of Naval Operations (Code N-45)  
Via: Commander, Naval Facilities Engineering Command (FAC 18)

Subj: HERBICIDE ORANGE SITE, AREA A, AT CBC GULFPORT

Ref: (a) SOUTHNAVFACENCOM Charleston SC 301300Z Jan 92

Encl: (1) HO Site, CBC Gulfport

1. The Herbicide Orange (HO) site at this command is currently out of compliance with the requirements of the initial permit for treatment and places us at risk for both civil and criminal penalties. We request your assistance towards earliest resolution of this matter.
2. The ash, which is F028 listed hazardous waste until and unless delisted, is piled on area A in waste piles that do not meet all of the requirements mandated in 40 CFR 264. Dioxin contaminated soils on sites A, B and C have not been remediated to the satisfaction of the U.S. Environmental Protection Agency (USEPA) Region IV and Mississippi Department of Environmental Quality (MSDEQ). The latter expressed serious concern with the lack of progress on sampling and monitoring the ash and groundwater on the sites during a meeting at CBC Gulfport on 10 September 1992. Enclosure (1) provides a brief history of the site along with possible options.
3. Since the current situation resulted from Air Force storage of HO at the site during the 1960s and 70s, we consider it imperative that they retain an active interest in its resolution. Towards that end, we request your assistance in pursuing one of two options. Option one is to request that the Air Force take a more active role in pursuing the delisting petition and site closure. The alternative, option two, is to reach agreement with the Air Force to allow the Navy to pursue the delisting efforts utilizing Air Force provided funds.
4. Our goal is to resolve this matter at the earliest practicable date so that the site can be returned to beneficial use. We request your support towards persuading the Air Force to assist us in actively pursuing delisting and remediation through one of the above arrangements. For questions or clarification, contact CDR Bill Dos Santos at DSN 868-2241 or commercial (601) 871-2241.

  
J. A. LEHMAN

Copy to:  
COMNAVFACENCOM (FAC 065, FAC 18E1)  
SOUTHNAVFACENCOM (Code 18210)



"Home of the Atlantic Fleet Seabees"

HERBICIDE ORANGE (HO) SITE, CBC GULFPORT

1. Site A was used for long-term storage of HO between 1970 and 1977. In addition, areas B and C were used for short-term storage of HO during the 1960s. The stored drums leaked and contaminated soil in all three areas. The contaminated soil from the three areas was excavated and thermally treated by the Air Force using a mobile incinerator. The treated soil (ash), F028, was placed in approximately 200 piles in area A.
2. A petition to delist the waste was prepared by the Air Force's contractor based on analyses of the ash exiting the incinerator. The petition was presented to USEPA headquarters by the Air Force in 1988 with an addendum presented in 1989. In 1989, USEPA 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.
3. Per a USEPA request, the Air Force prepared a work plan to perform additional random ash sampling and groundwater sampling to provide support for the delisting effort. The USEPA responded with comments on the work plan. As a result of these comments and the lack of action by the Air Force, SOUTHNAVFACENCOM prepared reference (a) requesting a time frame for revising the work plan for resubmittal to the USEPA. The Air Force did not respond to reference (a).
4. SOUTHNAVFACENCOM then arranged a meeting with the Air Force and CBC Gulfport on 7 April 1992 to discuss the status of the work plans. 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 Gulfport.
5. Attachment (1) shows the current waste management situation at the subject site. The current situation is that the ash, a listed hazardous waste, is stored in waste piles in area A 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 MSDEQ or USEPA 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 a RCRA Part B Post-Closure Permit. Clean Closure would require the ash, and potentially the contaminated soil on areas A, B and C, be transported to a permitted disposal facility. The groundwater would also have to be tested to prove it is not contaminated as a result of the 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 a RCRA Part B Post-Closure/HSWA Permit. This option will require that a landfill be constructed on-site to contain the waste, a groundwater monitoring system be installed and monitored for thirty years and that all solid waste management units 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.

Encl (1)





Attachment (1) - 1 of 2 (SITE A)



HERBICIDE ORANGE (HO) SITE, CBC GULFPORT

1. Site A was used for long-term storage of HO between 1970 and 1977. In addition, areas B and C were used for short-term storage of HO during the 1960s. The stored drums leaked and contaminated soil in all three areas. The contaminated soil from the three areas was excavated and thermally treated by the Air Force using a mobile incinerator. The treated soil (ash), F028, was placed in approximately 200 piles in area A.

2. A petition to delist the waste was prepared by the Air Force's contractor based on analyses of the ash exiting the incinerator. The petition was presented to USEPA headquarters by the Air Force in 1988 with an addendum presented in 1989. In 1989, USEPA 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.

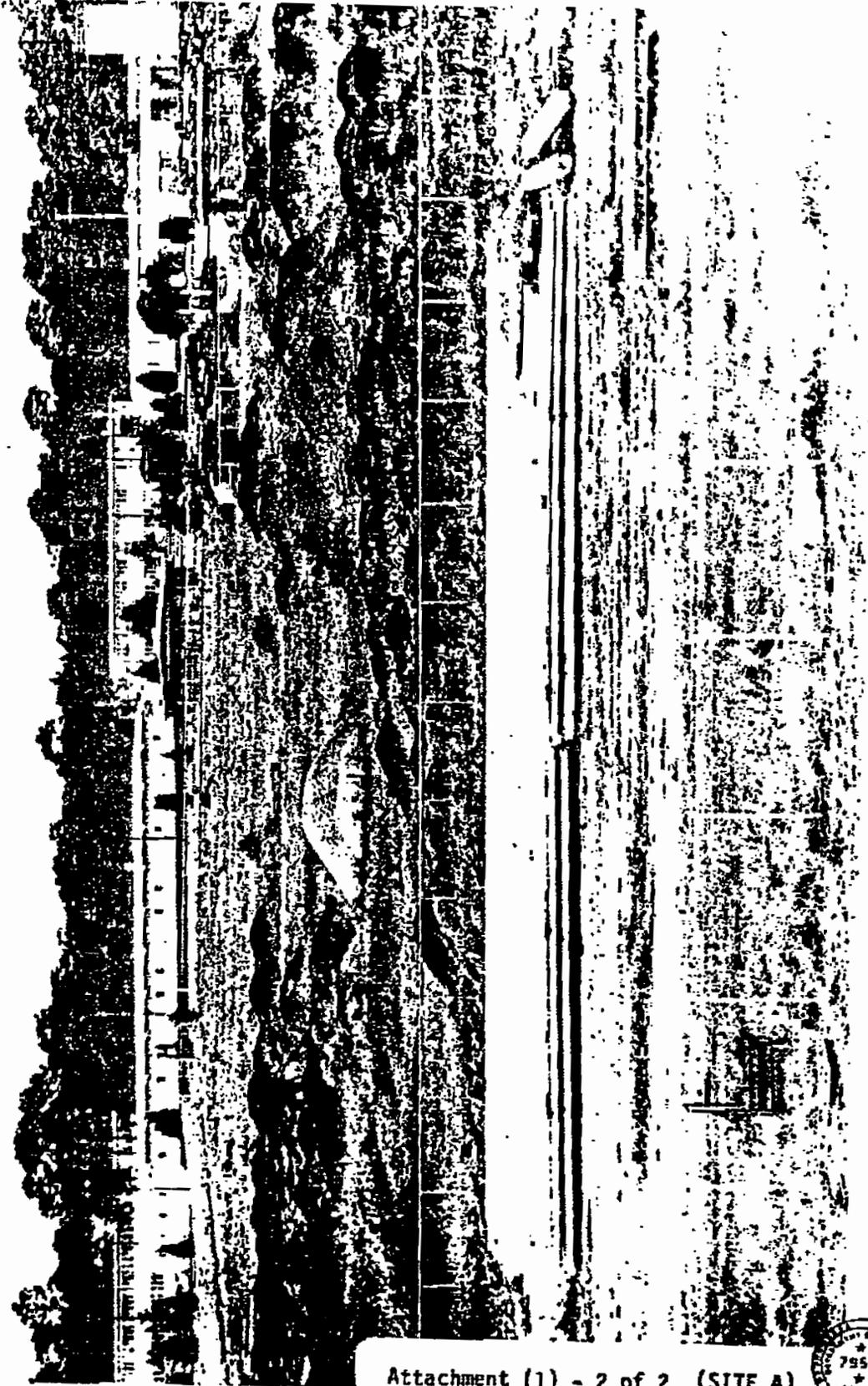
3. Per a USEPA request, the Air Force prepared a work plan to perform additional random ash sampling and groundwater sampling to provide support for the delisting effort. The USEPA responded with comments on the work plan. As a result of these comments and the lack of action by the Air Force, SOUTHNAVFACENCOM prepared reference (a) requesting a time frame for revising the work plan for resubmittal to the USEPA. The Air Force did not respond to reference (a).

4. SOUTHNAVFACENCOM then arranged a meeting with the Air Force and CBC Gulfport on 7 April 1992 to discuss the status of the work plans. 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 Gulfport.

5. Attachment (1) shows the current waste management situation at the subject site. The current situation is that the ash, a listed hazardous waste, is stored in waste piles in area A 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 MSDEQ or USEPA 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 a RCRA Part B Post-Closure Permit. Clean Closure would require the ash, and potentially the contaminated soil on areas A, B and C, be transported to a permitted disposal facility. The groundwater would also have to be tested to prove it is not contaminated as a result of the 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 a RCRA Part B Post-Closure/HSWA Permit. This option will require that a landfill be constructed on-site to contain the waste, a groundwater monitoring system be installed and monitored for thirty years and that all solid waste management units 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.

Encl (1)





Attachment (1) - 2 of 2 (SITE A)

