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NCBC GULFPORT
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MINUTES FROM 1 NOVEMBER 1990 HERBICIDE ORANGE MEETING NCBC GULFPORT
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NCBC GULFPORT

HERBICIDE ORANGE MEETING
NAVAL CONSTRUCTION BATTALION CENTER

GULFPORT, MS

1 NOVEMBER 1990

A meeting was held at the Naval Construction Battalion Center (CBC), Gulfport, on 1 November 1990 concerning the herbicide orange (HO) site closure. A list of attendees is included as Attachment I. Various items were discussed during the meeting concerning the disposition of the HO area, the ash located on sub-site "A" and the closure of all three sub-sites (A, B, and C) independent of the ash.

In previous meetings held with the Environmental Protection Agency (EPA) Region IV and the Mississippi Department of Environmental Quality (MSDEQ), both organizations gave the impression that the closure of the HO area could only be accomplished through the full Resource Conservation and Recovery Act (RCRA) process which requires a post closure permit, delisting the ash and then enveloping the rest of the Center under RCRA solid waste management unit corrective action requirements. The EPA had stated in earlier meetings that a health based risk assessment could be carried out which would allow closure under the "no action" alternatives. However, the MSDEQ would have to approve the actions. When presented with this, the MSDEQ stated they could see no way out of the full RCRA implementation process, and a post closure permit would be required before work on the site could proceed. At this point, the closure process was put on hold until an understanding could be reached which would satisfy the regulations, the EPA and the MSDEQ. Because of the confusion concerning these issues, it was agreed that a meeting at CBC Gulfport would be held to determine the correct methodology to use to close the HO area. The meeting was held 1 November 1990. Captain Hilderbrand opened the meeting by welcoming the EPA and MSDEQ to the Center and stating that the purpose of the meeting was to work out the problems we all seemed to have concerning the closure of the HO area. He further stated that the need for returning the sites to beneficial use was becoming acute because CBC Gulfport's storage requirements are increasing significantly, and the HO area needed for construction of new warehouses.

Following a discussion of the delisting petition and various cleanup options, Ms. Beverly Foster of EPA Region IV stated that we should look at the ash piles separate from HO sub-sites "B" and "C". She further stated that sub-sites "B" and "C" could be closed out under the Navy's IR program and their closure did not concern the ash on sub-site "A". Ms. Foster handed out a point paper which outlined the method which EPA Region IV felt would be the best method to use to close the sites (Attachment II).

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Ms Foster also stated that sub-site "A" could be covered under the risk assessment, along with sub-sites "B" and "C", until such time as the ash was confirmed as hazardous or not. If the ash is determined to be nonhazardous, then the closure of all three sub-sites could be carried out at the same time using the Installation Restoration (IR) program process. If for some reason the ash is determined to be hazardous, the "B" and "C" sites could be closed out independent of sub-site "A". A determination of what to do with sub-site "A" and the ash would then have to be made. This would give the Navy the use of sub-sites "B" and "C" regardless of the outcome of the ash investigation.

Mr. Steve Spangler of the MSDEQ stated that the State was in agreement with the EPA on the ash and the closure of the HO area. The diagram included as Attachment III displays the methodology to be used to complete the closure plan for the HO area. The EPA agreed to prepare a letter outlining the cleanup plan as shown in Attachment III.



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Note: CBC Gulfport Autovon prefix is 363



RCRA Closure Requirements for Ash Pile at
Naval Construction Battalion Center (NCBC), Gulfport, MS

PURPOSE: The purpose of this document is to clearly specify the requirements that apply to the closure of the ash pile from the incineration of Agent Orange-contaminated soil excavated from Site #8 at NCBC, as they apply under the Resource Conservation and Recovery Act (RCRA). Note that only the ash is considered to be hazardous waste under RCRA, therefore, all activities outlined below should be associated with the ash pile independent of the surrounding unexcavated soil from Site #8.

CLOSURE REQUIREMENTS:

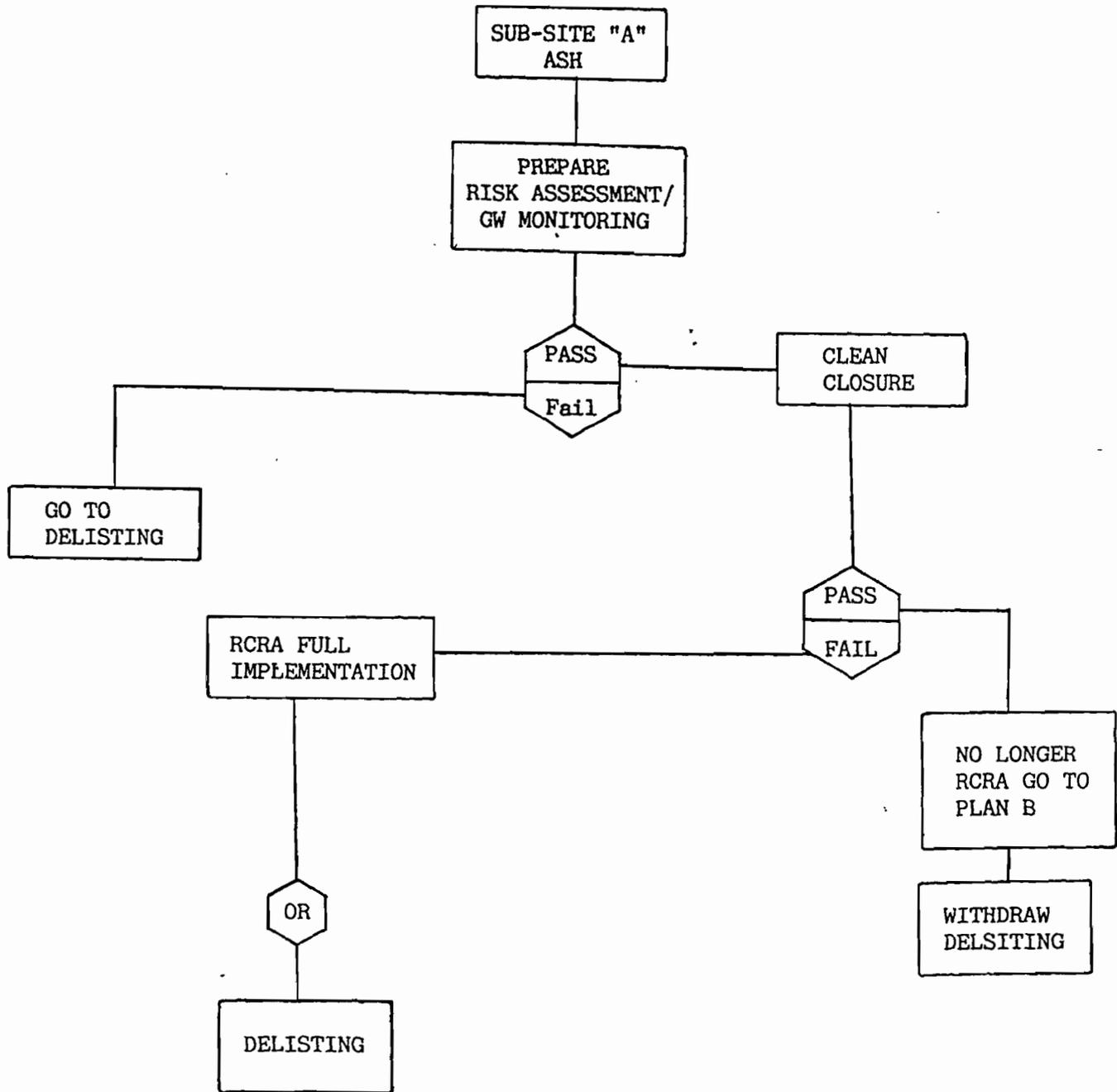
Submit a closure plan which meets the substantive requirements of 40 CFR 265 Subpart G for risk-based closure. Keep in mind that the objective of this plan will be to demonstrate that any waste left on the site is not present at levels that would adversely affect human health or the environment through implementation of the "no action" alternative.

In the case of NCBC, these requirements should address, at a minimum, the following:

- ° Response to EPA comments, dated December 7, 1989, regarding the site-specific risk assessment from the "Decision Document for the Remediation of Site #8 Former Herbicide Orange Storage Area at the Naval Construction Battalion Center, Gulfport, Mississippi," dated April, 1989;
- ° Installation of a groundwater monitoring system capable of detecting release of hazardous constituents from Site #8, since verification of clean groundwater is a RCRA requirement for risk-based closure of land-based units;
- ° Contingent closure/post-closure plan, to address ash disposition in the case justification of the "no action" alternative cannot be achieved.

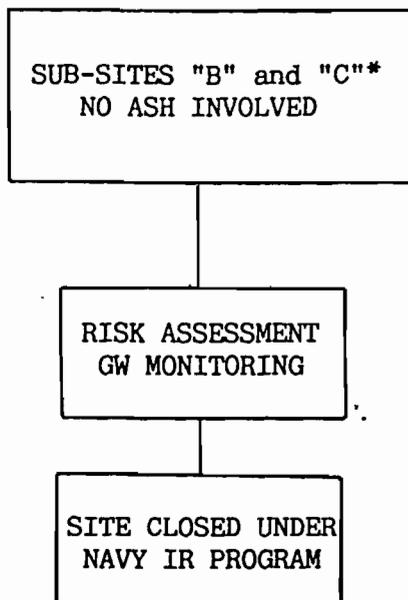


SITE CLOSURE PLAN A





SITE CLOSURE PLAN B



*IF THE ASH IS DETERMINED NON-HAZARD THEN SUB-SITE "A" WILL BE INCLUDED IN THE PLAN B ASSESSMENT.