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NCBC GULFPORT  
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MINUTES FROM THE 19 JANUARY 1995 HERBICIDE ORANGE SITE A PROJECT MEETING  
NCBC GULFPORT MS  
1/19/1995  
NCBC GULFPORT

39501-SITE 8 INCINERATION  
21.02.08.0013

Meeting Minutes  
January 19, 1995  
Herbicide Orange Site A  
ABB-ES, Tallahassee, FLA

Name	Company	Telephone
Baker Mordecai	SouthDiv	(803) 743-0690
Art Conrad	SouthDiv	(803) 743-0520
Gordon Crane	NCBC Gulfport	(601) 871-2485
John Gordon	USAF	(404) 331-6935
Phil Stapleton	Glover-Stapleton Assoc	(203) 426-9163
Penny Baxter	ABB-ES	(615) 531-1922
Kate Kelly	ABB-ES	(615) 531-1922
Marland Dulaney	ABB-ES	(904) 656-1293

The meeting was opened by Baker Mordecai who announced that the EPA is planning to turn over the delisting decision to the State of Mississippi. During a telephone conversation with Baker, Narendra Chaudhari (EPA Headquarters) had informed him that a letter was being drafted to identify the State of Mississippi as the lead agency.

Specific issues, question raised, discussion, and comments made during the meeting include the following:

- Current status. The chronology of events at Site 8 have led to NCBC being out of compliance with RCRA standards. F028 waste was left on an unpermitted site. No fines have been levied on the site because of the pending delisting petition and the good working relationship with the regulators. Baker stressed the importance of maintaining a good relationship and the importance of delivering documents in a timely manner.

The HO site is considered prime real estate and returning the site to use is crucial to the mission of the Base. The Base needs to use Areas A, B, and C (approximately 31 acres) for open storage.

- Ash Data. Kate Kelly presented the analytical data from the ash sampling. The maximum detected concentration of dioxin in the ash had a toxicity equivalency of 6.76 ppt. No dioxin was detected in the leachate from the TCLP analyses.

Risk Evaluation. Marland Dulaney stated that the 6.76 ppt was above the  $10^{-6}$  cancer risk of 3.91 ppt (as calculated by using standard EPA methodology) but well below the  $10^{-5}$  cancer risk. The method used takes indirect pathways into consideration. Marland further discussed the suspected non-cancer risks of dioxins. Dioxins have been linked to feminization of male offspring and to a decline of the immune system. The concentrations for these risks

have not yet been set but are expected to be lower concentrations than for cancer risk. Dioxins can take almost any pathway into the body including direct absorption through the skin. In order to convince the State to delist the ash, possible dioxin exposure may need to be eliminated and the risk reduced or minimized.

- Groundwater Data. Groundwater results from the first two sampling events did not detect any substantial TCDD equivalents. However, the third groundwater sampling event detected a maximum toxicity equivalency of 22.6 ppq (the MCL is 30 ppq). The difference is believed due to a change in analytical laboratories and the difference in extraction methods utilized by those labs. The original laboratory, Canviro, decanted the samples eliminating any suspended particulate material in the groundwater sample. The new lab, Quanterra, followed the 8290 extraction protocol which combines the extract of the suspended particulate and the groundwater. The combined extract yielded higher levels of TCDD.
- Future Strategy for the Site/Ash. A discussion was held concerning regulatory and remedial actions that may be taken at the site. P. Stapleton gave the group a handout outlining other sites which were successfully delisted. One reason the original delisting petition may have failed was that no plans were included for the disposition of the ash once delisting was granted. B. Mordecai stated that it was important to delist the ash before any other agreements were made with the State.

The incorporation of RCRA/CERCLA was addressed. M. Dulaney suggested that once the ash was delisted, a focused feasibility study be undertaken with a resulting Interim Record of Decision. The team agreed that a cost/benefit analysis would suggest leaving the ash on site as the most cost effective solution. The possibility of using the ash in paving material was discussed with the paving material covering the 30+ acres.

- Community Relations. G. Crane discussed the importance of community relations as it applies to the Herbicide Orange sites. He stated that the implementation of the RAB had started. The first public notification was to be included in the Sunday paper that week. The first meeting may be within 30 days.
- Meeting with Regulatory Agency. B. Mordecai suggested that a meeting with the State was needed. The group discussed setting up an informal meeting in Jackson to present findings of analytical data and to suggest possible remedial alternatives to the RCRA and CERCLA regulators. The target date for this meeting is the week of February 27. G. Crane will make arrangements for the meeting.