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NCBC GULFPORT
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LETTER DISCUSSING MEETING ITINERARY DATED 31 JANUARY 1986 NCBC GULFPORT
MS
2/14/1986
TYNDALL AIR FORCE BASE



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE ENGINEERING AND SERVICES CENTER
TYNDALL AIR FORCE BASE, FL 32403

FEB 14 1986

REPLY TO
ATTN OF: RDW

SUBJECT: TDY Trip Report

TO: RDW *JW 1/16/86*
RDV *ES 2/18/86*
RD *BoBV-19* RD, *2/20/86*
IN-TURN

1. Itinerary: HQ USEPA, Waste Identification Branch, Washington DC, 31 Jan 86.
2. Purpose: Discuss the delisting of soil produced as a result of R&D activities at the Naval Construction Battalion Center (NCBC), Gulfport MS.
3. Persons Attending:

Matt Straus
Doreen Sterling
Miles Morse
Harry Williams
Judy Casanova
Mr Dietrich
Capt Stoddart

EPA/WIB
EPA/WIB
EPA/WIB
EG/G
EG/G
ENSCO
AFESC/RDVW

4. Background: Delisting related to the formal process by which a waste, listed as hazardous by the Resource Conservation and Recovery Act is considered to be no longer hazardous or less hazardous. The AF project at NCBC will produce approximately 9000 cubic yards of thermally-treated soil. Although decontaminated, the soil is still considered a hazardous waste until it is delisted. HQ AFESC/RDVW has submitted a petition to EPA to initiate the delisting of the soil to be produced by the AF project.

5. Discussion: Three scenarios for delisting were discussed and a summary follows:

a. Delist Soil in Advance of NCBC Test. This would require that EPA establish a delisting standard in advance of the research project start. The Delisting standard would be published in the Federal Register and subject to a formal public comment period. Following public comment the EPA would review comments and then issue a formal delisting action that would be contingent on AF demonstrating (at NCBC) that the treated soil did in-fact meet the delisting criteria. This scenario would minimize the "down-time" of equipment at NCBC as the formal process involved with delisting would be completed prior to project start.

b. The second scenario discussed is similar to the first with the exception that all the formal delisting actions are conducted after the AF has held a trial-burn to generate data (NCBC). These data would then form the basis for the EPA delisting action. This scenario requires that our

contractor equipment remain on site and inactive for up to 5 months at a cost of approximately \$500K. — Unacceptable for my part of USAF. BT

c. The third scenario discussed was that the AF would commence the full scale operation at NCBC and stock-pile the treated soil. The delisting action would be accomplished in parallel with the full-scale test. Should delisting not be approved the AF would have approximately 9000 cubic yards of "contaminated" soil that would need to be disposed by some other means. Although this option would allow the test to proceed without interruption there is a risk that the soil would not be delistable and thus require additional funds to provide a disposal alternative. Unacceptable.

During the meeting I and our contractors strongly pushed EPA to go with option A; i.e. least cost, least delay, and least risk. Agree.

6. Comment: The waste Identification Branch will consult with the EPA legal staff to determine the appropriate (legal) approach to our delisting petition.

Terry L Stoddart

TERRY L. STODDART, Capt, USAF, BSC
Project Officer

Tell us if you need RD (or higher) assistance in getting option A approved. BTUV.