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NCBC GULFPORT
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LETTER FROM U S AIR FORCE REGARDING TRANSMITTAL OF DOCUMENTS
PERTAINING TO DISPOSAL OF HERBICIDE ORANGE CONTAINED WASTE NCBC
GULFPORT MS
6/24/1985
U S AIR FORCE



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

24 June 85

Reply to attn of: RDVW

subj: Herbicide Orange Waste Disposal; Letter of Transmittal

TO: Commanding Officer
Naval Construction Battalion Center
Gulfport, MS 39501
code 470

1. Please find attached copies of documents pertaining to the disposal of Herbicide Orange contaminated wastes that resulted from HQ AFESC/RDVW research projects at the Naval Construction Battalion Center(NCBC). Tab #1 is the TOSCA notification submitted to the Environmental Protection Agency. Tab #2 is the Environmental Protection Agency letter authorizing the Air Force to dispose of the described waste.
2. The exact number of drums scheduled for disposal will be determined on the last day of packing. The total number of drums will be less than that stated in the permit application. The reduced number of drums resulted from waste compaction that reduced the total volume to be disposed. The description of the waste is accurate. the only variation is that the soltrol solvent described will be shipped as a solidified material. the solidification step was a requirement stipulated by Rollins inc.
3. The generation of the described waste material is a one time only action related to our research at NCBC. No additional disposal requirement is projected.
4. Should you have questions please contact me at (601)-864-0056.

A handwritten signature in cursive script that reads "Terry L Stoddart".

Terry L Stoddart, Capt, USAF, BSC
Project Manager

attch
tab #1 TOSCA letter
tab #2 EPA authorization



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

APR 25 1985

REPLY TO
ATTN OF: RDVW

SUBJECT: Notification of Disposal of TCDD (Dioxin) Contaminated Waste from Air Force
Environmental Restoration Activities

TO:
Mr. Jack McGraw
Acting Assistant Administrator for
Pesticides and Toxic Substances
U.S. Environmental Protection Agency
Waterside Mall
401 "M" Street, S.W.
Washington D.C. 20460

1. The U.S. Air Force Installation Restoration Program is involved with two major research activities at former Herbicide Orange storage sites. The purpose of this application/notification is to provide for the disposal of dioxin contaminated personnel protection and sampling equipment generated during various phases of our two programs. Presently, surface and subsurface sampling is being conducted at the Naval Construction Battalion Center (NCBC), Gulfport MS and Eglin AFB (EAFB), Fort Walton Beach FL, to determine the profile and extent of contamination. Follow on phases involve testing soil decontamination technologies at NCBC.

2. Application for approval is made for disposal of TCDD contaminated waste under provisions of 40CFR, Part 775, 190(b). Disposal will be accomplished prior to 15 Jul 85.

a. Name and address of firm: HQ Air Force Engineering & Services Center
Engineering and Services Laboratory
(HQ AFESC/RD)
Tyndall AFB FL 32403 6001
ID No. FL 1570024124

b. Site 1: Naval Construction Battalion Center, Gulfport MS, ID #MS2170022626.

Site 2: Eglin AFB, Fort Walton Beach FL, ID# FL572024366.

c. Point of Contact: Capt Terry L. Stoddart
HQ AFESC/RDVW
Tyndall AFB FL 32403
(904) 283-2942

d. A review of current analytical data indicates the maximum levels of 2,3,7,8 TCDD contamination in soils from NCBC and EAFB is 300 ppb. The average concentration in these soils ranges from 20-30 ppb. Based on these data we anticipate that the drummed waste will contain substantially lower concentrations of 2,3,7,8 TCDD. The soil is also contaminated with varying concentrations of 2,4,D and 2,4,5T, ID Nos. D016 and D077, respectively.

d. Quantity of Waste: The first phase of soil sampling at NCBC resulted in the generation of 27 drums of contaminated clothing. The subsurface sampling scheduled for NCBC in early May will generate another 22 drums. Similar activities at EAFB are anticipated to generate 22 drums of contaminated clothing. The follow on phase of the project, which involves testing of soil decontamination technologies, scheduled for Jun 85, will generate approximately 54 drums of contaminated clothing. Currently, no technology demonstrations are scheduled for Eglin AFB FL. One of the technologies scheduled for demonstration at NCBC will produce 75 gallons of dioxin-contaminated solvent. The solvent, Solitrol®, is a petroleum product manufactured by Phillips. The solvent has a flashpoint of 185°F, pH 7, and a copper strip corrosion of 1.0. It is anticipated that the dioxin contamination in the solvent will be less than 100 ppb. A total of 127 drums are scheduled for disposal. The waste to be disposed consists of 125 drums of contaminated chemical protective equipment and two drums of contaminated solvents.

e. All waste will be packaged, labeled, and transported in accordance with existing EPA, DOT, and state regulations. Wastes will be disposed by incineration at Rollins Environmental Services, Inc., Deer Park TX, EPA ID No. TXD0551141378.

f. Status of Waste: The 27 fiber drums of contaminated wastes are stored in a open-sided metal storage shed at NCBC. The shed has a concrete floor. It is surrounded by a 6 foot high chain link fence topped with barbed wire. The drums are stacked one high on wood pallets and covered with 6-mil plastic sheeting. This storage facility is located inside the contaminated area, which is surrounded by a fence and posted as a restricted area. Waste presently generated will be stored in a similar manner until pickup for transportation to Rollins Environmental Services, Inc., which is scheduled for the last week of Jun 85.

3. Your time and effort for consideration of this approval request is appreciated. If questions should arise, please contact Capt Terry Stoddart, Headquarters Air Force Engineering and Services Center, Engineering and Services Laboratory (HQ AFESC/RDV), Tyndall AFB FL 32403-6001; (904) 283-2942.

James R. Van Orman

JAMES R. VAN ORMAN
Deputy Director of
Engineering & Services Laboratory

cc: EG&G Idaho (Mr. Williams)
U.S. EPA, Region 4
Mr. DesRosien, EPA/ORD
Mr. Kleveno, EPA/HRSD
Mr. Cummins, EPA/OSWER
325CES/DEEV
AD/DEV
NCBC/Code 470

Int cc AFESC/DEV

MAY 31 1985

Mr. James R. Van Orman
Deputy Director of
Engineering & Services Laboratory
Department of the Air Force
Headquarters Air Force Engineering and Services Center
Tyndall Air Force Base, FL 32403

Dear Mr. Van Orman:

We have reviewed your letter of April 25, 1985, informing the Environmental Protection Agency (EPA) of your intent to dispose of waste materials contaminated with 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD). We understand that you have about 125 drums of 2,3,7,8-TCDD-contaminated clothing and two drums of 2,3,7,8-TCDD-contaminated solvent. We also understand that you wish to dispose of this waste by incineration at Rollins Environmental Services, Deer Park, Texas.

The Agency's Dioxin Disposal Advisory Group (DDAG) has no objections to your planned disposal. We recommend that the incinerator be operated under the conditions that have demonstrated a destruction and removal efficiency (DRE) of 99.9999 percent for PCBs.

If you are unable to proceed with the planned disposal or if you choose an alternative method, please be advised that you are required to submit a new notification prior to disposing of 2,3,7,8-TCDD-contaminated waste materials. It should be noted that, after July 15, 1985, the effective date of the RCRA listing regulation (50 FR 1978-2006; January 14, 1985), which designates certain 2,3,7,8-TCDD-contaminated wastes as hazardous, you will be subject to the provisions of that rule. If you have any questions, please feel free to contact Dr. Howard Fribush, Office of Solid Waste, on (202) 475-6726.

Sincerely,


Jack W. McGraw
Acting Assistant Administrator