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TRANSMITTAL LETTER FOR THE REVISED RESEARCH, DEVELOPMENT AND
DEMONSTRATION PERMIT UNDER THE RESOURCE CONSERVATION AND RECOVERY
ACT NCBC GULFPORT MS
11/23/1987
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
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Major Terry Lee Stoddart
HQ AFESC/RDVW
Tyndall AFB, Florida 32403

RE: Renewal and Revision of RCRA RD&D Permit
Naval Construction Battalion Center, Gulfport, Mississippi
EPA I.D. No. MS2 170 022 626

Dear Major Stoddart:

Enclosed is the revised Research, Development, and Demonstration (RD&D) permit under the Resource Conservation and Recovery Act (RCRA) for the above referenced facility. This permit was originally issued on July 2, 1986, for the purpose of conducting research activity at the Naval Construction Battalion Center (NCBC), Gulfport, Mississippi. Specifically, the technical efficiency and cost-effectiveness of using mobile incinerator technology for treatment of dioxin contaminated soil was to be demonstrated under this project.

The original permit is being revised to include new operating conditions for the incinerator and to include additional requirements for ambient air monitoring, operation of the thermal relief vent and additional analyses for the treated soil. The revised conditions are described below:

1. The operating conditions for the incinerator (Permit Condition III.E.) were based on data from an identical unit at El Dorado, Arkansas. EPA was informed in January 1987 that the data from the El Dorado, Arkansas unit was invalid. Therefore, on May 11-16, 1987, a RCRA dioxin trial burn was conducted at NCBC to determine the correct operating conditions. The results from the trial burn were submitted on July 23, 1987, with subsequent revisions dated August 18, 1987, and October 19, 1987, respectively. Permit Condition III.E. has been revised to reflect the new operating conditions based on the May 1987 trial burn results.
2. Permit Condition III.F. has been added concerning operation of the thermal relief vent (TRV). This permit condition specifies when the TRV can be used and also the operating conditions for the incinerator when the TRV is in use. Specifically, the TRV can only be opened for one of the following reasons:
 - a) Steam drum water level falls to 0%.
 - b) Exit temperature of waste heat boiler exceeds 600°F
 - c) Inlet temperature of packed tower exceeds 220°F

The minimum operating temperature of 2150°F must be maintained in the secondary combustion chamber whenever the TRV is open. If the TRV is opened for any other reason, then operation cannot resume without approval from EPA.

3. Permit Condition III.G. has been added concerning ambient air monitoring during soil excavation. The condition states that the Permittee shall follow the ambient air monitoring plan outlined in Attachment IX. Specifically, Condition III.G. and Attachment IX specifies the following:
 - a) Ambient air will be monitored on a 24-hour basis during the first thirty (30) days of excavation. (Please note that reference to "first (30) days of operation" has been changed to "first 30 days of excavation," pages 18, 19, 20, and 24, respectively of Attachment IX).
 - b) Ambient air monitors shall be placed as specified in Table 3-1 and Section 3.2 of Attachment IX.
 - c) Soil excavation must stop until appropriate dust suppression measures are taken if hourly mini-ram or 24-hour Hi-Vol readings exceed 3 times background for total suspended particulates. Background will be established on a daily basis at the upwind sampler (Sampler A in Table 3-1).
 - d) Soil excavation must stop if TCDD levels, as measured by the 24-hour PUF samplers, exceed 3 pg/m³. Excavation may not resume without approval from EPA.
 - e) Hi-vol and mini-ram readings shall be used to evaluate the need for dust suppression throughout excavation activities for the project.
4. Permit Condition III.H. has been added to specify due dates for the following reports:
 - a) Evaluation of waste feed rate versus auger rpm
 - b) Summary report for the first 30 days of excavation under the ambient air monitoring plan.
 - c) Comparison of soil moisture content as calculated with ASTM Method D 2216-80 and the infrared moisture analyzer.
 - d) Results from the comprehensive chemical analyses on treated ash residue.
5. Permit Condition II.I. and Attachment VIII have been revised to clarify the sampling procedure for treated ash residue. Permit Condition III.I. has also been revised to include comprehensive analysis on the treated soil every 30 days of operation.