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NCBC GULFPORT  
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LETTER REGARDING U S EPA REGION IV RESPONSE TO U S NAVY REQUESTS FOR  
LATER PERMIT EXPIRATION, INCREASE IN NUMBER OF OPERATIONAL DAYS AND  
INCREASE IN PERMIT CONDITION NCBC GULFPORT MS

5/26/1988

U S EPA REGION IV

File 7 Inc 88



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
MAY 26 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

4WD-RCRA

Mr. James R. Van Orman  
Deputy Director, Engineering  
and Services Laboratory  
Department of the Air Force  
Headquarters Air Force Engineering  
& Services Center  
Tyndall Air Force Base, Florida 32403-6001

RE: Permit Extension and Modification Request  
Naval Construction Battalion Center, Gulfport, Mississippi  
EPA I.D. No. MS2 170 022 626

Dear Mr. Van Orman: *BOSV (3) Jun*

This is in response to your request for extension and modification of the above referenced permit. Specifically, you have requested the following:

1. Extension of the expiration date of the permit from August 4, 1988, to August 4, 1989.
2. An increase in the number of operational days from 150 to 250.
3. An increase in permit condition III.C from 11,000 cubic yards to 14,000 cubic yards.

Justification for each request is listed below:

1. Extension of the permit expiration date is needed since the first 30 days of operation achieved only 55 percent of estimated soil throughput. Particulate fouling problems limited soil throughput to significantly less than the 5.3 tons/hr authorized in the permit. The recent replacement of the screw auger and development of more efficient methods for cleaning the SCC have improved the incinerator's operation.
2. One hundred (100) additional operating days are needed based on observed soil throughput during the first 90 days of operation. Included in this request are 44 additional days for contingencies, debris reduction, increased soil moisture, etc.

Also, because of waste-feed operational problems, data has not been collected at the maximum waste-feed rate. The lack of operational data at the maximum feed rate detracts from the quality of the study and raises questions about the validity of the cost versus throughput analysis. Now that most of the system problems have been resolved, the requested 100 additional operational days will allow a complete evaluation of this promising technology.

3. The request for an increase in the total soil quantity from 11,000 to 14,000 cubic yards is being made as a contingency. There appears to be 20-25 percent uncertainty of the final soil volume. Variability in soil bulk density (essentially the moisture content) and the ability to successfully clean (excavate) a given area are the primary factors responsible for inherent errors in soil quantity assessment. Currently, the project is experiencing a 30 percent re-excavation rate as compared to the 10 percent rate originally predicted.

Based on the above, the permit expiration date and operational days are hereby extended as requested according to the provisions of 40 CFR §270.65(d). The request for additional soil capacity, which is a major permit modification under 40 CFR §270.41, will be public noticed under the provisions of 40 CFR Part 124. During the comment period, only the condition subject to modification will be re-opened.

The revised permit cover sheet for extension of the expiration date from August 4, 1988, to August 4, 1989, and increase of operational days from 150 to 250 days is enclosed. Listed below is the target project decision schedule for modification of the permit.

- |                                      |                    |
|--------------------------------------|--------------------|
| 1. Draft Permit Prepared             | May 25, 1988       |
| 2. Public Notice Period Begins       | June 8, 1988       |
| 3. Public Notice Period Ends         | July 25, 1988      |
| 4. Tentative Public Hearing          | August 2, 1988     |
| 5. EPA Response to Comments Prepared | August 16, 1988    |
| 6. Final Permit Issued or Denied     | August 18, 1988    |
| 7. Permit Effective                  | September 18, 1988 |

The schedule listed above is based on comments being received during the public comment period. In the case of no comments, the target decision schedule will be as follows:

- |                                |               |
|--------------------------------|---------------|
| 1. Draft Permit Prepared       | May 25, 1988  |
| 2. Public Notice Period Begins | June 8, 1988  |
| 3. Public Notice Period Ends   | July 25, 1988 |
| 4. Final Permit Issued         | July 28, 1988 |
| 5. Permit Effective            | July 28, 1988 |

If there are questions concerning any of the above, please contact Ms. Caron Falconer at (404)347-3433.

Sincerely yours,

A handwritten signature in black ink that reads "Patrick M. Tobin". The signature is written in a cursive style with a large initial 'P'.

Patrick M. Tobin  
Director  
Waste Management Division

Enclosure

cc: Sam Mabry, Mississippi Department of Natural Resources  
Major Terry Stoddart, NCBC  
Commanding Officer, NCBC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMIT  
FOR HAZARDOUS WASTE TREATMENT

Permittees: U.S. Navy Permit Number: MS2 170 022 626  
U.S. Air Force  
Facility: Naval Construction Battalion Center

This permit is issued by the United States Environmental Protection Agency (EPA) under authority of the Resource Conservation and Recovery Act Subtitle C, 42 U.S.C. §§6921-6931 (1976, Supp. IV 1980 and Hazardous and Solid Waste Amendments of 1984) (RCRA) and EPA regulations to the United States Air Force and the United States Navy (hereafter called the Permittees), to operate a hazardous waste research, development and demonstration facility located in Gulfport, Mississippi at the Naval Construction Battalion Center (NCBC) at latitude 30° 18' and longitude 89° 12'. The project will test incineration and chemical treatment as a waste treatment process to decontaminate soils that are contaminated with dioxin from Herbicide Orange.

The Permittees must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in the attachments) and the Regulations specifically contained in this permit.

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated January 29, 1986, as modified by subsequent amendments dated April 2, 1986 and May 9, 1986 (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 C.F.R. §270.41, §270.42 and §270.43) and potential enforcement action (42 U.S.C. §6925(g)). The Permittees must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of August 4, 1987, and shall remain in effect until August 4, 1989, and shall not exceed 250 operating days after commencement of experimental treatment. This permit may be revoked and reissued, or terminated in accordance with 40 C.F.R. §270.41, §270.43 or §270.65.

May 26, 1988  
Date

Patrick M. Tobin

Signature

Patrick M. Tobin, Director  
Waste Management Division