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NCBC GULFPORT
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LETTER DISCUSSING U S EPA REGION IV IS CONSIDERING CONDUCTING A THIRD
BURN TEST NCBC GULFPORT MS
11/4/1987
TYNDALL AIR FORCE BASE



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS AIR FORCE ENGINEERING AND SERVICES CENTER
TYNDALL AIR FORCE BASE FL 32403-6001

4 NOVEMBER, 1987

Reply to attn of: RDVW (Maj Stoddart)

Subj: NCBC Sampling and Analysis of Soil and Process Ash

To: Mr Patrick Tobin
EPA, Region IV
345 Courtland St
Atlanta, Georgia 30365

1. Reference our telephone conversation, same subject, on 2 November, 1987.
2. Although our current permit (appendix A, ppgs A1 to A3) only called for comprehensive analyses on treated soil resulting from our December, 1986 Verification test burn, I believe there is a need to analyze additional samples to enhance the research value of the project. In fact, our current plans call for a comprehensive analysis of a monthly composite sample of thermally treated soil. The parameters to be analyzed will be similar to those included in the Verification Test Burn Report submitted to Region IV in March, 1987. The referenced report presents the results of comprehensive laboratory tests that documents the capability of the ENSCO, MWP-2000 incinerator to thermally treat NCBC soil contaminated with Herbicide Orange.
3. During routine operations daily composite samples of treated soil will be analyzed for the 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) isomer to determine if the treated soil meets the 1 part per billion objective stated in the R&D permit. Additionally, composite samples will be collected from each 20x20 foot excavation area and analyzed for TCDD to determine if the concentration is below 1 part per billion as stated in the permit. Approximately 1500 soil samples will be submitted to the contract laboratory.
4. The results of the comprehensive analyses stated above will be available from the contract laboratory approximately 30 days from the date that the sample is submitted. Results for routine TCDD analyses will be available 5 to 7 days after the sample is received by the contract laboratory.

5. Recent conversations with the Region IV staff have indicated that Region IV is considering a new requirement that would necessitate conduct of a third test burn to demonstrate the capability of the NCBC incinerator to produce treated soil of a predetermined quality. I hope that this is not the situation. The Verification Test Burn, previously discussed, provided a substantial amount of data to describe the quality of treated soil. These data have been used to prepare the draft delisting petition. In my opinion conduct of a new series of tests would duplicate existing data, substantially increase the cost, and further delay the project without providing any benefit to the environment.

5. Should you wish to discuss this issue or any other issue related to commencement of this project, please contact me at the NCBC, Field office: tele 601-864-4139.

Terry L Stoddart

Terry L Stoddart, Maj, USAF, BSC
CH, Environmental Restoration R&D