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NCBC GULFPORT
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LETTER TRANSMITTING U S EPA REGION IV COMMENTS ON LETTERS DATED 9 JUNE
1987 AND 18 AUGUST 1987 REGARDING TRIAL BURN REPORT NCBC GULFPORT MS
9/23/1987
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 23 1987

4WD-RCRA

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

RE: Response to EPA Letters Dated June 9, 1987, and August 18, 1987
Naval Construction Battalion Center, Gulfport, Mississippi
EPA I.D. No. MS2 170 022 626

Dear Major Stoddart:

Per our telephone conversation of September 18, 1987, the following changes must be made to your response concerning the above referenced letters.

1. The theoretical calculations for the maximum volume the auger will deliver at given rpms must be corrected. This is in response to question 7 of EPA's letter dated August 18, 1987. The calculations submitted show 4.36 tons/hr at 5.8 rpms. However, the actual value observed during the trial burn was 5.3 tons/hr at 5.8 rpms. As discussed, the calculations for theoretical volume and/or bulk density should be checked.
2. An explanation or correction for the number of spikes done under Section 12.2.5A of the QAP must be provided. This is in response to question 3 of EPA's August 18, 1987, letter. The QAP lists four (4) spikes, however, we could only find two (2) in your response. Please explain or correct this discrepancy.
3. The data from the June 29-30 TRV event simulation showing the change in SCC temperature versus time must be provided. This is in response to question 2 of EPA's June 9, 1987, letter.
4. Your response to question 2 of EPA's letter dated June 9, 1987, must be changed to state that the SCC flame and temperature will be maintained during a TRV event until all solids exit the kiln.
5. The retention time for kiln solids at 4.5 rpms must be provided. The retention time will determine how long flame must be maintained in the SCC during a TRV event. (Question 2, EPA's June 9, 1987, letter).
6. The time needed for the diesel generator to restore power during a power failure must be provided. Also, the length of time that the incinerator can operate with the diesel generator and confirmation that full operation can be maintained must be provided. (Question 2, EPA's June 9, 1987, letter).

7. The correct moisture content for solids to the kiln must be provided in the combustion gas velocity calculation. Also, the correct heat capacity value and the contribution from combustion of kiln solids and/or organics must be added to the calculation. (Question 4, EPA's June 9, 1987, letter).

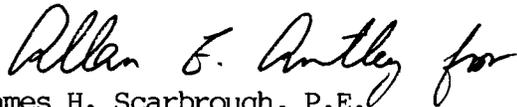
As discussed, the following permit conditions will be added for opening of the TRV:

1. Steam drum water level falls to 0%
2. Exit temperature of waste heat boiler exceeds 600°F
3. Inlet temperature of packed tower exceeds 220°F

The TRV can only be opened for one of the above reasons and temperature must be maintained in the SCC until all solids exit the kiln. If the TRV is opened for any other reason, then operation cannot resume until EPA is notified.

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

Sincerely yours,



James H. Scarbrough, P.E.
Chief, RCRA Branch
Waste Management Division

cc: Sam Mabry, Mississippi Department of Natural Resources
Daniel Haley, EG&G