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LETTER FROM U S EPA REGARDING RESEARCH DEMONSTRATION AND  
DEVELOPMENT APPLICATION NCBC GULFPORT MS  
3/3/1986  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

MAR 3 1986

4WD-RM

Captain C. M. Maskell  
CEC, U.S. Navy  
Commanding Officer  
Naval Construction Battalion Center (NCBC)  
Gulfport, Mississippi 39501

Re: Research Demonstration and Development (RD&D) Application  
Naval Construction Battalion Center (NCBC), Gulfport, Mississippi

Dear Captain Maskell:

The Environmental Protection Agency (EPA) has reviewed your RD&D application submitted January 29, 1986. Based on this review we have determined that the application is incomplete and additional data and information will be required. The deficiencies are described in the attached comments. Please note that our comments are contingent upon submittal of the trial burn data from the Ensco mobile incinerator at Region 6. Additional information will be needed if the Region 6 data is incomplete.

Please submit five (5) copies of your response to:

U.S. Environmental Protection Agency  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365  
Attention: James H. Scarbrough

As discussed in the meeting on January 29, 1986, the following schedule for permit issuance is projected.

<u>Day</u>	<u>Activity</u>
1	Acceptable Trial Burn Results from Region 6 and Acceptable Response to EPA Comments submitted.
30	Draft Permit Prepared
45	Draft Permit Public Noticed
75	Public hearing on draft permit
90	Public comment period closes

105 Response to Comments Completed  
105 Permit Issued  
135 Permit Effective

Also discussed at the meeting were questions concerning construction of the unit at the site and delisting of treated soil and scrubber effluent. EPA Headquarters is considering options for expediting the delisting process including establishment of delisting criteria for delisting the wastes as generated. The Office of General Counsel citing Section 3005(a) of RCRA as amended, has determined that pre-fabrication and transport to the site can be done prior to permit issuance. Site preparation, grading, pouring of foundations, hook-up to power units, etc. cannot begin until the permit is effective.

If there are further questions, please contact Ms. Caron Falconer of my staff at 404/347-3067.

Sincerely yours,



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

Enclosure

cc: Jack M. McMillan, Mississippi Department of Natural Resources

RD&D Application Comments NCBC, Gulfport, Mississippi

1. Please provide data concerning proposed waste feed rates to the incinerator.
2. Please provide information concerning start-up shakedown of the unit.
3. Please provide procedures for introduction of contaminated soil to the unit during normal operation. Procedures should include that contaminated soil is not introduced during start-up.
4. The RD&D permit will provide for storage of hazardous waste associated with the RD&D project. We have determined that the contaminated soil into the unit is F027 listed waste and that the treated soil and scrubber effluent is F028 listed waste. On page 5-20 you state that F028 treated soil will be stored in containers on a "clean soil pile." Please verify which storage method will be used. Also please provide more information concerning storage of the F027 contaminated soil prior to incineration.
5. On page 8-3 of the closure plan, you state that water and solids removed from the ash receiving bin, secondary combustion, sumps in the air pollution control train and other points in the system will be land applied or transferred to the site. The solids and water are listed wastes for purposes of RCRA and as such cannot be disposed of in this manner under the RD&D permit unless delisted before hand.
6. Please verify if the application distinguishes between "ash" and "treated soil."
7. The Contingency Plan should contain procedures for fires and explosives.
8. Section 2.8 concerning the test plan is missing from the application. Please submit this document.