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NCBC GULFPORT
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING REVIEW OF
STATEMENT OF WORK FOR DECONTAMINATION OF EQUIPMENT VEHICLES AND
MISCELLANEOUS MATERIAL NCBC GULFPORT MS

5/6/1986

U S EPA REGION IV

CY: FILE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

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MAY 6 1986

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Major Ronald A. Vogel
Chief, Protection and Assessments
Department of the Air Force
Headquarters Air Force Engineering
& Services Center
Tyndall Air Force Base, Florida 32403

Re: Comments on Statement of Work for Decontamination of Equipment,
Vehicles, and Miscellaneous Material at Naval Construction Battalion
Center, Gulfport, Mississippi

Dear Major Vogel:

This is in reference to the decontamination of equipment, vehicles, and miscellaneous material at the Naval Construction Battalion Center (NCBC), Gulfport, Mississippi. As discussed with Captain Foth, the rinsate/filtrate generated during clean-up is F027 listed waste for purposes of the Resource Conservation and Recovery Act (RCRA). However, the liquid waste is not subject to RCRA regulation if: (1) discharged through a sewer to a publicly owned treatment works (POTW) (§261.4(a)(1)(ii)), or (2) discharged under an NPDES permit, (§261.4(a)(2)), or (3) shipped to a POTW (§270.60(c)); shipments to a POTW must be manifested according to the requirements in 40 CFR Parts 262 and 263. Please specify which option will be used. If one of the above is not employed then the rinsate/filtrate must be handled as RCRA listed waste subject to all applicable portions of 40 CFR Parts 260, 261, 264 and 270.

The following comments concern the statement of work (SOW) covering the decontamination:

- 1) Storage of the carbon filter material is subject to Part 262 (for less than 90 days storage in containers or tanks) or Part 264 and 270 (permitting requirements). Please note that if a RCRA storage permit is needed, the permit must be effective before construction of the storage facility since this would be a "new" facility.

- 2) The narrative in Sections 3.10 and 3.20(c) of the SOW must be changed since the filtrate is RCRA listed waste and as such cannot be disposed of on the land without interim status or a RCRA disposal permit. Please revise the SOW accordingly.
- 3) Long-Term non-decontaminated storage (Sections 3.9 and 3.2(b) of the SOW) must be in accordance with Part 262 or Parts 264 and 270 as discussed in (1) above. It is our understanding that this material will be incinerated as part of the RD&D project. The SOW should be revised to reflect this.
- 4) Please explain the statement concerning "other possible hazardous chemicals" in Section 3.23 of the SOW. If this is hazardous waste as defined in Part 261 of RCRA, then it must be handled as RCRA hazardous waste subject to all applicable portions of 40 CFR Parts 260, 261, 264 and 270.
- 5) Please note that since the rinsate/filtrate is F027 listed waste, any spills or run-off must be contained and disposed of as RCRA listed waste in accordance with all applicable requirements in Parts 260, 261, 262, 264 and 270 (Sections 3.11 and 3.20(c)).

If there are questions, please contact Ms. Caron Falconer of the Waste Engineering Section at (404) 347-3067.

Sincerely yours,

Craig S. Braun

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

cc: Jack McMillan, Mississippi Department of Natural Resources