

N62604.AR.000278
NCBC GULFPORT
5090.3a

LETTER FROM U S EPA REGION IC REGARDING REQUEST FOR TRIAL BURN PLAN FOR
REVIEW NCBC GULFPORT MS
3/4/1987
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4WD-RM

MAR 04 1987

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

Dear Captain Maskell:

We have reviewed the data from ENSCO's trial burn in March 1986 provided in the "Application for Certification to Incinerate Hazardous Wastes F020 through F028" dated January 30, 1987 and, "Analysis of Data from the March 1986, tests of the MWP-2000" dated December 19, 1986. ENSCO clearly states that they did not meet the 99.9999% DRE standard for dioxin wastes on the POHCs (Principal Organic Hazardous Constituents) they had specified in their RCRA trial burn plan. We did note that ENSCO achieved seven and eight nines DRE on PCBs. Since they only analyzed for total PCBs and not for specific PCB isomers in the waste feeds and stack gas samples, the PCB data can not be used for dioxin certification (see the Federal Register of January 14, 1985/Vol. 50, No. 9/pages 1978-2006). Therefore we have determined that the ENSCO incinerator does not meet the RCRA dioxin standards of 40 CFR §265.352 and §264.343.

As you know, the concept presented to EPA all through the RD and D application process was that ENSCO had already proven in March 1986 at El Dorado that their incinerator met the technical standards, and the RD and D permit was issued on the basis that the data would be submitted to Region IV as soon as it was available. Since the data does not show compliance with the RCRA dioxin standards, you cannot incinerate the dioxin contaminated soils at the Naval Construction Battalion Center at Gulfport, MS until we have reviewed data which demonstrates six nines DRE from a RCRA trial burn conducted with POHCs more difficult to destroy than dioxins in a soil matrix.

Therefore the Air Force must provide a trial burn plan for our review for a trial burn to be conducted on the incinerator at Gulfport or ENSCO's same design mobile incinerator at EL Dorado. We would recommend that you consider using hexachlorobenzene mixed with clean soils at Gulfport for the trial burn or repeat the Phase II RCRA trial burn at El Dorado.

If we can be of any assistance to you please give us a call.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "P. M. Tobin".

Patrick M. Tobin, Director
Waste Management Division

cc: Sam Mabry, MS DNR
Art Linton, Federal Facilities Coordinator

