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LETTER FROM U S EPA REGARDING TRIAL BURN REPORT NCBC GULFPORT MS  
8/18/1987  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

248 COURTLAND STREET  
ATLANTA, GEORGIA 30333

AUG 18 1987

Major Terry L. Stoddart  
Department of the Air Force  
HQ AFESC/RDVW  
Tyndall Air Force Base, Florida 32403-6001

RE: Trial Burn Report  
Naval Construction Battalion Center, Gulfport, Mississippi  
EPA I.D. Number MS2 170 022 626

Dear Major Stoddart:

We have completed our review of the trial burn report submitted July 23, 1987. Based on this review, we have determined that the report is incomplete and additional information is needed. Please submit the following:

1. More complete information from the analytical laboratory. Specifically, raw data (e.g., weights, dilutions, day-to-day operations), laboratory chain-of-custody procedures, GC/MS logs, and summary reports of QAH or QCC inspections are needed.
2. Because DRE calculations and other reported results were based on nondetect levels found in the various sample matrices, the assumptions and calculations performed in determining the minimum detection limits must be presented.
3. Section 12.2.5A of the QAP specifies that at least two clean XADs and at least two clean filters should be spiked with the POCs to determine percent recovery. Accuracy values for these spiked samples were not found in the data packet summary tables.
4. Sections 12.2.1A of the QAP specifies the analysis of at least one performance sample to assess the accuracy of the instrumental procedure. It is unclear whether this QC check was performed.
5. Section 12(B).4 of the QAP specifies that control charts be generated from check standards run every 8 hours; the analytical report from ITC indicates that a continuing calibration standard was analyzed every 12 hours. Please clarify this discrepancy.
6. In the trial burn report, Table 1 (page v) lists the Modified Method 5 train's analytical detection limit as 0.01 ug/dscf. This claim is misleading, since a sampling train's detection limit is estimated typically as a mass value (e.g., 1 ug, etc.). As noted in the comment above, further discussion of detection limits is needed.



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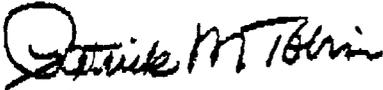
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7. Theoretical calculations of the maximum volume the auger will deliver at given rpms. The data should also be plotted on a graph (volume vs. rpms) for the 5-6 rpm range using only the number of decimal places consistent with the accuracy of the auger speed controller. Also, please submit the density of the trial burn sand and the native soil.
8. The data used to develop the graphs and the averages listed in the tables. When you compare the sand feed rate averages on pages 21 and the graphs on page 26, they do not appear to agree. Several other parameters also do not seem to closely correlate. The information submitted may influence some of the numbers recommended for permit conditions.
9. The DAS formula for calculating the SCC residence time.
10. The DAS data on the ejector scrubber nozzle control parameters (raw data and graphs), i.e. steam pressure, draft and recirculation flow rate.
11. The CO strip charts and DAS data for the December verification soil tests.
12. The graphs for the soil feed rates and auger rpms re-done using the same time increments so that the data can be compared.

In addition to the above, the issues outlined in our June 6, 1987 letter must be resolved. If there are questions, please contact Ms. Caron Falconer or Ms. Betty Willis of my staff at (404) 347-3433.

Sincerely yours,



Patrick M. Tobin, Director  
Waste Management Division

cc: Sam Mabry, Mississippi Department of Natural Resources  
John Loughhead, E3&G  
Dan Haley, E3&G

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