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NCBC GULFPORT
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RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMIT FOR HAZARDOUS WASTE
TREATMENT PERMIT MS2 170 002 626 NCBC GULFPORT MS
7/29/1988
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMIT
FOR HAZARDOUS WASTE TREATMENT

NCBC Gulfport Administrative Record
Document Index Number

39501-SITE 8 INCINERATION

09.02.08.0011

Permittees: U.S. Navy
U.S. Air Force Permit Number: MS2 170 022 626
Facility: Naval Construction Battalion Center

This permit is issued by the United States Environmental Protection Agency (EPA) under authority of the Resource Conservation and Recovery Act Subtitle C, 42 U.S.C. §§6921-6931 (1976, Supp. IV 1980 and Hazardous and Solid Waste Amendments of 1984) (RCRA) and EPA regulations to the United States Air Force and the United States Navy (hereafter called the Permittees), to operate a hazardous waste research, development and demonstration facility located in Gulfport, Mississippi at the Naval Construction Battalion Center (NCBC) at latitude 30° 18' and longitude 89° 12'. The project will test incineration and chemical treatment as a waste treatment process to decontaminate soils that are contaminated with dioxin from Herbicide Orange.

The Permittees must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in the attachments) and the Regulations specifically contained in this permit.

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated January 29, 1986, as modified by subsequent amendments dated April 2, 1986, and May 9, 1986 (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 C.F.R. §270.41, §270.42 and §270.43) and potential enforcement action (42 U.S.C. §6925(g)). The Permittees must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

A modification to this permit, as public noticed on June 8, 1988, changed permit condition III.C. from 11,000 cubic yards to 14,000 cubic yards.

This permit is effective as of August 4, 1987, and shall remain in effect until August 4, 1989, and shall not exceed 250 operating days after commencement of experimental treatment. This permit may be revoked and reissued, or terminated in accordance with 40 C.F.R. §270.41, §270.43 or §270.65.

July 29, 1988
Date

Patrick M. Tobin

Signature
Patrick M. Tobin, Director
Waste Management Division

9.2.8.11

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PART I - STANDARD CONDITIONS

A. EFFECT OF PERMIT

This permit authorizes only the research on hazardous waste treatment expressly described in this permit and does not authorize any other management of hazardous waste. EPA will consider compliance with the terms of this permit to be compliance with requirements of RCRA Subtitle C and EPA regulations concerning the management of hazardous waste listed or described in this permit. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 or RCRA, Section 106(a), 104, or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 C.F.R. §270.41, §270.42, §270.43, §270.65 and 42 U.S.C. Section 6925(g). The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittees does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

The Regional Administrator may order an immediate termination of all operations under this permit at any time he determines that termination is necessary to protect human health and the environment (42 U.S.C. §6925(g)).

E. DEFINITIONS

For the purpose of this permit, terms used herein shall have the same meaning as those in Title 40 of the Code of Federal Regulations (40 C.F.R. Parts 260 through 264 and 270), unless this permit specifically states otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. "Regional Administrator" is the Regional Administrator of the United States Environmental Protection Agency for Region IV.

F. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE REGIONAL ADMINISTRATOR

All reports, notifications or other submissions which are required by this permit to be sent or given to the Regional Administrator should be sent certified mail or given to:

U.S. Environmental Protection Agency
Director, Waste Management Division
345 Courtland Street, N.E.
Atlanta, GA 30365
(404)347-3454

G. SIGNATORY REQUIREMENTS

All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 C.F.R. §270.11.

H. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

The Permittees shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

1. Research plan as specified in this permit Attachment I.
2. Personnel training documents and records required by applicable portions of 40 C.F.R. §264.16 and this permit.
3. Emergency response plan required by this permit.
4. Closure plan required by applicable portions of 40 C.F.R. §264.112 and this permit.
5. Operating record required by applicable portions of 40 C.F.R. §264.73 and this permit.
6. Inspection schedules and logs required by applicable portions of 40 CFR §264.73 and this permit.

I. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittees shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any other permit noncompliance constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittees in an enforcement action to argue that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. CFR §264.15 and this permit.
3. Duty to Mitigate. In the event of noncompliance with this permit, the Permittees shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.
4. Proper Operation and Maintenance. The Permittees shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittees to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems to maintain compliance with the conditions of the permit.
5. Property Rights. The permit does not convey any property rights of any sort, or any exclusive privilege.
6. Duty to Provide Information. The Permittees shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittees shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
7. Inspection and Entry. The Permittees shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

- d. Sample or monitor, at reasonable times for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

8. Monitoring and Records.

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity in accordance with Attachment I.
- b. The Permittees shall retain the final project report and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report, or application. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- c. Records of monitoring information shall specify:
 - (1) The dates, exact place, and times of sampling or measurements;
 - (2) The individuals who performed the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The individuals who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
- d. The sampling protocol for the treated soil residues must be submitted to EPA for review and approval prior to sampling.

9. Reporting Planned Changes. The Permittees shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility. This notice must include a description of all incidents of noncompliance reasonably expected to result from the proposed changes.

10. Certification of Construction or Modification. The Permittees may not commence incineration or chemical treatment of hazardous waste at the facility until:

- a. The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
- b. The Regional Administrator has either waived the inspection or has not within 72 hours notified the Permittees of his intent to inspect.

11. Anticipated Noncompliance. The Permittees shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
12. Twenty-Four Hour Reporting. The Permittees shall report to the Regional Administrator any noncompliance which may endanger health or the environment. Information shall be provided orally within twenty-four (24) hours from the time the Permittees become aware of the circumstances. This report shall include the following:
 - a. Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - b. Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste research, development, and demonstration facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided to the Regional Administrator within five (5) days of the time the Permittees become aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The Permittees need not comply with the five (5) day written notice requirement if the Regional Administrator waives that requirement and the Permittees submit a written report within fifteen (15) days of the time the Permittees become aware of the circumstances.

13. Other Noncompliance. The Permittees shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports are submitted. The reports shall contain the information listed in permit condition I.12.
14. Other Information. Whenever the Permittees become aware that they have failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittees shall promptly submit such facts or information to the Regional Administrator.
15. Transfer of Permit. This permit may not be transferred to a new owner or operator.

J. COMPLIANCE SCHEDULE

The following information shall be submitted to the Regional Administrator before incineration of hazardous waste.

1. The Spill Prevention Control and Countermeasures Plan (SPCC) for the facility. The SPCC shall address but not be limited to the following:
 - a. Spill prevention from hazardous waste staging and processing, solid residuals staging, and scrubber effluent staging.
 - b. Spill containment from waste staging and processing units, effluent staging units, the MWP-2000 unit.
 - c. Spill clean-up and rainwater disposition.
 - d. Recordkeeping and Reporting.
2. The Statement of Work for Sampling and Analysis.
3. The Standard Operation Procedures specified on page 5-2 of Attachment I.
4. Telephone numbers and names of the emergency coordinators as described in Attachment IV.

PART II - GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY

The Permittees shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. RESEARCH PLAN

The Permittees shall follow the procedures described in the attached research plan, Attachment I.

C. GENERAL INSPECTION REQUIREMENTS

The Permittees shall follow the inspection plan set out in the inspection schedule, Attachment II. The Permittees shall remedy any deterioration or malfunction discovered by an inspection as required by 40 C.F.R. §264.15(c). Records of inspections shall be kept as required by permit condition G.I.c.

D. PERSONNEL QUALIFICATIONS

The Permittees shall ensure that personnel are qualified to manage hazardous waste as provided in Attachment III. This training program shall follow the attached outline, Attachment III. All personnel involved with activities under this permit shall receive this training prior to initiation of activities under this permit as described in the attached outline, Attachment III.

E. PREPAREDNESS AND PREVENTION

1. Required Equipment. At a minimum, the Permittees shall equip the facility with the equipment set forth in the emergency response plan, Attachment IV.
2. Testing and Maintenance of Equipment. The Permittees shall test and maintain the equipment specified in the previous permit condition and in Attachment IV as necessary to assure its proper operation in time of emergency.
3. Arrangements With Local Authorities. The Permittees shall maintain arrangements with State and local authorities as required by 40 C.F.R. §264.37. If State or local officials refuse to enter into or renew existing preparedness and prevention arrangements with the Permittees, the Permittees must document this refusal in the operating record.

F. EMERGENCY RESPONSE PLAN

1. Implementation of Plan. The Permittees shall immediately carry out the provisions of the emergency response plan, Attachment IV, and follow the applicable emergency procedures described by 40 C.F.R. §264.56 whenever there is an imminent or actual fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittees shall comply with the requirements of 40 C.F.R. §264.53.
3. Amendments to Plan. The Permittees shall review and immediately amend, if necessary, the emergency response plan, as required by 40 C.F.R. §264.54.
4. Emergency Coordinator. The Permittees shall comply with the requirement of 40 C.F.R. §264.55.

G. RECORDKEEPING AND REPORTING

1. The Permittees shall maintain a written operating record at the facility in accordance with 40 C.F.R. §264.73(a). The operating record must be maintained until closure of the facility and shall include the following
 - a. The location of each hazardous waste within the facility and the quantity at each location.
 - b. Records and results of waste analyses performed as specified in Attachment I and the statement of work to be submitted under permit condition I.J.2.
 - c. Records and results of inspections required by permit condition II.C.
 - d. Monitoring, testing, or analytical data as specified in Attachment V.
 - e. The documentation required under permit condition II.E.3 if applicable.

H. CLOSURE

1. Performance Standard. The Permittees shall close the facility in accordance with the closure plan, Attachment VI. In addition, the incinerator shall be operated on natural gas at the operating conditions specified in permit condition III.E. for two (2) days (48 hours) during closure to ensure contaminated soil is not left in the system.
2. Amendment to Closure Plan. The Permittees shall amend the closure plan in accordance with 40 C.F.R. §264.112(b) whenever necessary.

3. Notification of Closure. The Permittees shall notify the Regional Administrator at least 15 days prior to the date he expects to begin closure.
4. Time Allowed for Closure. After treating the final volume of hazardous waste, the Permittees shall treat or remove from site all hazardous waste and shall complete closure activities within 180 days of notification of closure in accordance with the closure plan, Attachment VI.
5. Disposal or Decontamination of Equipment. The Permittees shall decontaminate and/or dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, Attachment VI.
6. Certification of Closure. The Permittees shall certify that the facility has been closed in accordance with the specifications in the closure plan, Attachment VI, as required by 40 CFR §264.115.

I. EXPERIMENTAL PROCEDURES

1. The Permittees shall follow the experimental procedures set forth in Attachment I.
2. The Permittees shall handle all scrubber waters from the incinerator as described in Attachment VII.
3. The Permittees shall handle all treated soil from the incinerator as specified in Attachment VIII.
 - a. Soil samples shall be obtained as specified in Appendix B of Attachment VIII.
 - b. Within one (1) week of operation, a 24-hour composite sample of treated soil shall be analyzed for the parameters outlined in Attachment 4-A of Attachment XI. The analysis in Attachment 4-A shall be repeated each 30 days following the initial analysis. Sample procedures shall be those specified in Appendix B of Attachment VIII. Footnote "e" of Attachment 4-A shall be complied with by following the analytical methods specified in Attachment 4-B, (Attachment 4-B is in Attachment XI).

PART III - INCINERATION TREATMENT

I.A. CONSTRUCTION

The Permittees shall construct and maintain the incinerator in accordance with the attached plans and specifications, Attachment I.

III.B. PERFORMANCE STANDARD

The Permittees shall construct and maintain the incinerator so that, when operated in accordance with the operating requirements specified in this permit, it will meet the following performance standards.

1. The incinerator must achieve a destruction removal efficiency (DRE) of 99.9999% for 2,3,7,8 tetrachlorodibenzo-p-dioxin (TCDD) and dibenzofuran.
2. The Permittees must control hydrogen chloride (HCl) emissions, such that the rate of emissions is no greater than the larger of either 1.8 kg/hr or 1% of the HCl in the stack gas prior to entering any pollution control equipment.
3. The incinerator must not emit particulate matter in excess of 180 milligrams per dry standard cubic meter when corrected for the amount of oxygen in the stack gas in accordance with the formula specified in 40 CFR §264.343(c).
4. Compliance with the operating conditions specified in this permit will be regarded as compliance with the above performance standards. However, evidence that compliance with such permit conditions is insufficient to ensure compliance with the above performance standards may be "information" justifying modification, revocation or reissuance of the permit pursuant to 40 CFR §270.41.

III.C. MAXIMUM WASTE TO BE TREATED

The Permittees may treat up to 14,000 cubic yards of material identified in permit condition III.D.

III.D. LIMITATION ON WASTES

The Permittees shall treat with incineration the following hazardous wastes:

<u>Waste Code Number</u>	<u>Description</u>	<u>Feed Rate</u>
F027	Soil contaminated with Herbicide Orange	0-5.3 tons/hr

Miscellaneous combustible (wooden pallets) and noncombustible (concrete/drum) refuse present on the storage area. Residues and equipment resulting from chemical treatment described in Attachment I.

III.E. OPERATING CONDITIONS

The Permittees shall feed the waste described in Condition III.D. to the incinerator only under the following conditions:

1. The rotary kiln temperature, as measured by the outlet gas thermocouple (TE-121), shall be maintained above 1450°F.
2. The secondary combustion chamber temperature, as measured by the outlet gas thermocouple (TE-223), shall be maintained above 2150°F.
3. The secondary combustion chamber residence time, calculated from Equation 16 in Attachment X, shall be maintained above 1.65 seconds.
 - a. The soil feed rate in lbs/hr shall be calculated and input to the Data Acquisition System (D.A.S.) each 8-hour shift.
 - b. The soil moisture content shall be measured with the infrared analyzer, as described in Attachment X. If the infrared device fails, then moisture content shall be calculated and input to the D.A.S. each 8-hour shift using ASTM Method D2216-80.
4. Maximum stack gas carbon monoxide (CO) concentration, measured as specified in Attachment I, shall not exceed 50 ppm for more than six (6) minutes accumulative every clock hour, or 500 ppm maximum at any time.
5. Maximum auger speed, measured at the auger hydraulic motor gear (SE-137), shall not exceed 5.8 rpm.
6. Packed tower scrubber water recirculation flowrate, measured at the distribution headers (FE-415) shall be maintained above 132 gallons/minute.
7. Ejector scrubber water recirculation flowrate, measured at the ejector scrubber inlet (FE-422), shall be maintained above 35 gallons/minute.

8. Kiln pressure, as measured at the exit of the kiln (PT-124) shall not exceed -0.05 inches of water for more than 15 seconds.
9. The Permittees shall operate the incinerator to immediately cut off hazardous waste feed when any of the following occur:
- a) Kiln temperature, as measured in Condition III.E.1. falls below 1450°F.
 - b) Secondary combustion temperature as measured in Condition III.E.2. falls below 2150°F.
 - c) Residence time, as calculated in Condition III.E.3. falls below 1.65 seconds.
 - d) Stack gas carbon monoxide (CO) level, as measured in Condition III.E.4. exceeds 50 ppm for more than 6 minutes accumulative every clock hour, or 500 ppm maximum at any time.
 - e) Maximum auger speed, as measured in Condition III.E.5., exceeds 5.8 rpm.
 - f) Packed tower scrubber water recirculation flowrate, measured in Condition III.E.6., falls below 132 gallons/minute.
 - g) Ejector scrubber water recirculation flowrate measured in Condition III.E.7., falls below 32 gallons/minute.
 - h) Kiln pressure, measured in Condition III.E.8. exceeds -0.05 inches of water for more than 15 seconds.
 - i) The Data Acquisition System (D.A.S.) fails and cannot calculate residence time.
 - j) The following incinerator monitoring equipment fails:
 - 1. Thermocouple TE-121
 - 2. Thermocouple TE-223
 - 3. O₂ analyzer
 - 4. CO analyzer
 - 5. Kiln natural gas flow meter
 - 6. Secondary combustion chamber natural gas meter
 - k) The solids feed weigh hopper fails and cannot be fixed within 15 minutes.

10. During start-up and shut-down of the incinerator, hazardous waste must not be introduced into the incinerator unless the incinerator is operating within the conditions specified in Conditions III.E.1. through 8.
11. The Permittees shall monitor the facility, as specified in Attachment I.
12. In the event of loss of flame in the secondary combustion chamber, the Permittees must restore flame within three (3) minutes. Temperature in the SCC must be maintained at 2150°F until all* solids exit the kiln.
13. The CO and O₂ continuous emission monitors shall be calibrated daily with zero and span gases. Zero gas shall be 0 to 10% of full scale and span gas shall be 80 to 100% of full scale.

III.F. THERMAL RELIEF VENT

The thermal relief vent shall only be used in emergency situations which could endanger downstream pollution control equipment and only after all waste feeds have been cut off. The following failure modes are emergency situations where the Permittees may use the thermal relief vent:

1. Steam drum water level on the waste heat boiler falls to zero (0) percent.
2. Exit temperature of the waste heat boiler, as measured by thermocouple TE 409, exceeds 600°F.
3. Inlet temperature of the packed tower, as measured by thermocouple TE 321, exceeds 220°F.

The Permittees shall minimize emissions during a TRV event by maintaining temperature in the secondary combustion chamber at 2150°F until all* solids exit the kiln. Within 24 hours after an event in which the thermal relief vent is opened, the Permittees shall be required to verbally report the incident to the Regional Administrator. A written report will be required within fifteen (15) days to explain the reason for the incident and actions being taken to prevent the situation from recurring. If the TRV is opened for any reason other than the three (3) failure modes listed above, the Permittees shall not be allowed to resume feeding hazardous waste to the incinerator until approval is received from the Regional Administrator.

*The requirement for all solids to exit the kiln shall be considered met if kiln rotation is maintained at or above 4.5 rpm for twenty (20) minutes.

III.G. AMBIENT AIR MONITORING PLAN

1. The Permittees shall follow the ambient air monitoring plan outlined in Attachment IX.
2. The Permittees must immediately stop excavation if PUF Sampler C exceeds the 2,3,7,8-TCDD action level of 3 pg/m³ as described on page 18 of Attachment IX. The Permittees may not resume excavation until approval is received from the Regional Administrator if the action level is exceeded.

III.H. SUBMITTAL OF INTERIM REPORTS

1. The Permittees shall evaluate bulk average waste feed rate (as measured by the weigh hopper) versus auger rpm for the first fourteen (14) days of operation. This data shall be submitted to the Regional Administrator within ten (10) days of compliance. The data will be used to evaluate the accuracy of auger rpm as the indicator of waste feed rate (Condition III.E.5.).
2. The Permittees shall continue ambient air monitoring with the PUF samplers as described in Section 3.3.2 of Attachment IX until the Regional Administrator approves the summary report and revised sampling plan described on page 24 of Attachment IX.
3. The Permittees shall submit the waste feed moisture analysis comparison data described in Attachment X within five (5) days.
4. The Permittees shall submit results from the treated soil analyses under Condition II.I.3.b. within fourteen (14) days of the analysis.

PART IV - CHEMICAL TREATMENT

A. CONSTRUCTION AND MAINTENANCE

The Permittees shall construct and maintain the chemical treatment units in accordance with the attached design plans and specifications, Attachment I.

B. MAXIMUM WASTE TO BE TREATED

The Permittees shall not chemically treat more than 12 cubic yards of soil which has been contaminated with dioxin from Herbicide Orange from NCBC, Gulfport, Mississippi during the term of this permit.

C. OPERATING CONDITIONS

1. The Permittees shall conduct the chemical treatment in accordance with the test procedures outlined in Attachment I.
2. Test 1. Slurry Process shall take place in Zone 1 and/or Zone 2 of the regulated area described in Attachment I.

D. CLOSURE AND WASTE DISPOSAL

The Permittees shall dispose of all residues and equipment resulting from chemical treatment in the incinerator. During disposal, the incinerator shall be operated as specified in permit Condition III.E.

PART V - TEST DATA SUBMISSION

The Permittees shall submit a copy of all preliminary data collected during the tests to the Regional Administrator upon completion of the tests. The Permittees shall submit the draft and final reports for the incinerator and chemical treatment research projects as soon as such reports become available, but not later than one (1) year from the expiration date of this permit. If the reports are not completed at this time, the Permittees shall report monthly thereafter on the status of the reports. All submissions must be certified in accordance with 40 CFR §270.11. The Permittees shall make the raw data available to EPA upon written request.