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NCBC GULFPORT
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LETTER REGARDING U S EPA REGION IV RESPONSE TO PETITION TO DELIST
INCINERATOR ASH STORED AT THE HERBICIDE ORANGE SITE NCBC GULFPORT MS
5/1/1992
U S EPA

39501-SITE 8 INCINERATION

19.01.08.0017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Colonel Peter Walsh
Department of the Air Force
Headquarters United States Air Force
Washington D.C. 20332-5000

May 1, 1992

Dear Colonel Walsh:

I am writing in regard to your petition (#0759) to delist incinerator ash stored at the Naval Construction Battalion Center's (NCBC) Gulfport, Mississippi facility, presently listed as EPA Hazardous Waste No. F028 (residues resulting from thermal treatment of soil contaminated with 2,4,5-T). On February 28, 1992 you submitted a draft sampling and analysis plan for the ash and ground water to supplement data presented in your delisting petition. Our comments on your draft sampling and analysis plan are provided below.

Ash Sampling

We believe that the additional sampling and analyses proposed for the ash is warranted to verify the original ash data presented in your delisting petition and to help resolve some inadequacies that were identified with that data. While the overall analytical plan is acceptable, we believe that reallocating the sampling efforts will better characterize the incineration residuals. Therefore, we recommend the following changes with respect to your proposed sampling methodology, list of constituents to be analyzed, number of total constituent analysis, number of TCLP extract analysis, and quality assurance/quality control analysis:

- o To the extent possible, the core samples should comprise a full-depth profile of the sampled waste piles. We do not understand why the top 6 inches of waste should not be included in the collected sample. The core sample should reach close to the bottom of the pile, if practical. The removal of 1/4" material prior to transfer to sample bottles is acceptable.

19.1.8.17



- o As noted below, we believe 10 composite ash samples will be sufficient to supplement the existing data. Because the site to be sampled appears to consist of hundreds of discrete piles (rather than a contiguous landfill or pile), we suggest that you attempt to collect subsamples from approximately 10% of the piles (including at least several subsamples from the one large ash pile on the site), and composite 5-10 of the subsamples accordingly to produce 10 composite samples. Your proposal to divide the area containing the ash into 100 subareas would be acceptable, provided all discrete piles within each of the 10 randomly chosen subareas are sampled in order to generate a representative composite of 5-10 subsamples.
- o Ten (instead of five) composite ash samples should be analyzed for total levels of all of the organics you suggested, including dioxins/furans (with the hepta- and octa- isomers), polycyclic aromatic hydrocarbons (PAHs), herbicides, polychlorinated biphenyls (PCBs)/pesticides, and other semivolatile and volatile organic compounds (VOCs). To provide a complete set of total constituent analyses on these 10 samples, we also suggest that total levels of metals be determined.
- o TCLP extracts of the 10 composite ash samples should be analyzed for dioxins/furans (including the hepta- and octa- isomers), PAHs, and metals. As you proposed, other organic constituents need only be determined in the TCLP extracts if the compounds are found in the totals analyses. Note, however, that VOCs require a special TCLP extraction and short holding times before analysis.

In general, all sampling and analyses must be accompanied by the appropriate QA/QC information and should adhere to all preservation and sample holding times set out in SW-846. You should follow the practical quantification limits (PQLs) identified in SW-846 for all extract and waste samples. If a PQL is not available for a specific constituent, then laboratory detection limits should be as close to established drinking water standards as possible, if a standard has been established. Our specific comments/recommendations on the proposed QA/QC procedures in your draft plan are as follows:

- o The PQLs presented in Tables 2-1 and 2-2 are adequate.
- o Sample duplicates proposed in Table 2-2 are not required. Matrix spike/matrix spike duplicate analyses will provide adequate precision data.
- o The holding times listed in Table 2-5 should commence from the date of collection (as opposed to the date of receipt).



Please provide an accurate estimate of the current maximum volume of the waste. Your statement that the waste is in "several hundred piles of 15- to 20-cubic yards each" is difficult to reconcile with your estimate of 30,000 cubic yards of soil being incinerated. Such a volume would seem to require thousands, rather than hundreds, of storage piles of 15-20 cubic yards. An accurate estimate of waste volume is important in our evaluation of the waste, and may be critical if the residuals are moved for final disposal.

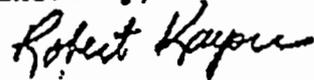
Ground-Water Sampling

Your proposed ground-water monitoring plan, developed under DOD's Installation Restoration Program (IRP), will provide ground-water data for several Areas. We are most interested in the ground-water data for Area A (location of the petitioned ash). It appears from the proposed locations of four monitoring wells along Greenwood Avenue in Figure 3-1 of your draft plan (and assuming ground-water flow direction is correct), that you may be able to provide ground-water data to determine the impact of the petitioned ash on ground-water quality. However, whether the monitoring system can truly distinguish any impact of the petitioned waste from any contamination possibly caused by untreated soils remains to be seen.

In general, ground-water monitoring systems approved by EPA Regions or a State will provide the data necessary for petition evaluation. Ground water samples should be analyzed for all the constituents that may be present in the ash. At a minimum, we recommend that the samples be analyzed for dioxins/furans, PAHs, and any constituents detected in the original analyses of the ash. Any analyses for metals should include total analyses, rather than dissolved metal analyses, unless determined otherwise by the EPA Region or State. For additional details regarding ground-water monitoring information requirements, please refer to the Federal Register notice on the Agency's use of ground-water data in delisting decisions (54 FR 41930, October 12, 1989). Typically, the minimum of four rounds of samples are collected over the course of 12 rather than 6 months in order to fully account for possible seasonal variations. However, this (and other details of any ground-water monitoring plan) depends on the requirements of the State or EPA Region IV.

Should you have any questions regarding this letter or any other aspect of your petition, please contact Narendra Chaudhari of my staff at (202) 260-4787 or our technical consultant, Gwen de Poix of SAIC, at (703) 827-8177.

Sincerely,



Robert Kayser, Chief
Delisting Section

cc: Narendra Chaudhari
Jim Kent, EPA HQ
Doug McCurry, EPA Region IV
James Scarbrough, EPA Region IV
Jeff Short, Department of the Air Force
Gwen de Poix, SAIC
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