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NCBC GULFPORT
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LETTER DISCUSSING ENVIRONMENTAL; RESTORATION TECHNOLOGY RESEARCH AND
TEST EVALUATION REPORT AND REQUESTED RESEARCH WAIVER NCBC GULFPORT

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4/25/1985

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TOSCA Waiver NCBC

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

APR 25 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Colonel Robert Boyer
HQ AFESC/RD
Tyndall Air Force Base, FL 32403

Dear Colonel Boyer:

We have reviewed your document entitled "Environmental Restoration Technology--Research and Test Evaluation," informing the Environmental Protection Agency (EPA) of your intent to treat soils contaminated with 2,3,7,8-tetra-chlorodibenzo-p-dioxin (2,3,7,8-TCDD). We understand that you wish to conduct a series of research tests on less than 3,700 pounds of soil (less than two tons, or two cubic yards) contaminated with approximately 200 ppb of 2,3,7,8-TCDD. The 2,3,7,8-TCDD-contaminated soil is located at the Naval Construction Battalion Center (NCBC), Gulfport, MS, the site of the research tests. We also understand that you plan to destroy the 2,3,7,8-TCDD in the soil by testing two treatment units for approximately three to five weeks. The two units are: 1) thermal pyrolysis using the Advanced Electric Reactor developed by the J. M. Huber Company, and 2) thermal desorption followed by ultraviolet light destruction, developed by the IT Corporation. Because the destruction tests are being conducted for research purposes, you have requested a waiver from notification under 40 CFR Part 775.

On March 21, 1985, the Dioxin Disposal Advisory Group (DDAG) met with the U.S. Air Force to discuss the details of the planned research and evaluation studies. As a result, the DDAG determined that the proposal involves potentially feasible technologies, that the technical, safety, and environmental factors have been adequately addressed, and that the research activities will provide useful information in the destruction of 2,3,7,8-TCDD-contaminated soils. Thus, a research waiver from the notification requirements under 40 CFR Part 775 is hereby granted to the U.S. Air Force (HQ AFESC) to conduct the research tests. The waiver is being granted since the quantity of soil is small, the equipment being used for the research is pilot scale, and the tests to be conducted are of short duration. If testing should continue beyond July 15, 1985, the effective date of the RCRA dioxin regulation (50 FR 1978-2006; January 14, 1985), the activities will be subject to the provisions of that rule.

Your research at Johnston Island, however, will occur after July 15, 1985. As such, it will be subject to the RCRA dioxin listing. As discussed with members of your staff, EPA is proceeding with the preparation of a research development and demonstration permit. If you have any questions, please feel free to contact Dr. Howard Fribush, Office of Solid Waste, on (202) 475-6678.

Sincerely yours,

13/ Jack W. McGraw

Jack W. McGraw
Acting Assistant Administrator

cc: Captain Terry Stoddart
HQ AFESC/RDVW
Tyndall Air Force Base