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TRANSMITTAL LETTER FOR THE STATE OF NEW JERSEY DEPARTMENT OF  
ENVIRONMENTAL PROTECTION COMMENTS ON ISSUES RAISED 2 JUNE 1988 IN  
RELATION TO TRIAL BURN PLAN FOR DEMILITARIZATION FURNACE NWS EARLE NJ  
8/16/1988  
STATE OF NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Trenton, N.J. 08625-0028

Let's protect our earth



09/28/23  
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- Review  
- Pass to NAPEE for response  
- provide copy also to 20.  
(609)633-1408

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State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam  
Deputy Director  
Hazardous Waste Operations

John J. Trela, Ph.D., Director

Lance R. Miller  
Deputy Director  
Responsible Party Remedial Action

AUG 16 1988

E.P. Nicholson  
Captain, U.S. Navy  
Commanding Officer  
Department of The Navy  
Naval Weapons Station Earle  
Colts Neck, New Jersey 07722-5000

Dear Captain Nicholson:

RE: TRIAL BURN PLAN FOR DEMILITARIZATION FURNACE, NAVAL WEAPONS  
STATION EARLE, COLTS NECK, MONMOUTH COUNTY, EPA ID No.  
NJ 0170022172

The Bureau of Hazardous Waste Engineering acknowledges the receipt a letter dated June 2, 1988 in which Navy has requested additional information about trial burn plan discussed at a meeting between NWSE, EPA and NJDEP held on 5/3/88. After the review of the submittal by NJDEP, following are our comments on those issues raised in June 2, 1988 letter in order of appearance:

1. In accordance with Mr. Allan Edwards letter of March 14, 1978 to Mr. Hal Hawkins, GSA, in New York City, an air permit and certificate is not required if the equipment was installed prior to August 7, 1977. The design and operating specifications of the incinerator and the pollution control equipment as well as all the air contaminant emissions (before and after control equipment) shall be submitted as part of the hazardous waste permit. The air contaminant emissions should include at a minimum; particulates, sulfur oxides, nitrogen oxides, carbon monoxide, total hydrocarbons, heavy metals, hydrochloric acid, and any other specific air contaminants from the combustion of the wastes. The incinerator, at a minimum, must meet the requirements of N.J.A.C. 7:27-11 "Incinerators", a copy of which is attached. Also, EPA "Notice of Violation and Compliance Demand", Docket Number 11 RCRA 86-0104, dated March 31, 1986, requires that the incinerator comply with N.J.A.C. 7:26-11.5.
2. The Demilitarization Furnace is classified as an Incinerator in accordance with the definition in N.J.A.C. 7:27-11.

not attached

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3. Tests shall be conducted for HCL emissions on the basis that representative samples for the analysis of chlorine content may be difficult to obtain. Also, there is a wide variety of wastes that are incinerated. However, if the Navy can provide sufficient documentation, including calculations, which can convince us that, under worst case conditions, the HCL emissions would be minimal, we may consider not requiring HCL tests.
4. A final determination on the test methods for a trial burn cannot be made at this time. Until we receive information on what all the air contaminants are and the amounts, the specific test program cannot be specified.
5. The basic sampling train for heavy metals is Method 5, modified specifically for heavy metal collection. The analyses depends upon the specific heavy metals emitted. Upon receiving information on the type and amount of heavy metals emitted, the corresponding analytical procedure can then be specified.
6. Carbon Monoxide and oxygen monitors must meet the EPA Performance Specification Tests, Part 60, Appendix B of the Federal Register. We cannot recommend a vendor for these monitors. However, any questions relative to both the requirements and vendors should be directed to Mr. Edward Choromanski, Acting Chief, Bureau of Technical Services at 609-530-4066.
7. Without having any information on the normal operating level or range of CO, temperature and pressure, a determination of specific cut-off points for the waste feed for each of these parameters is not possible.
8. The regulations do not allow fugitive emissions for source operations. However, a variance from this requirements may be submitted to the Department for review and approval if it can be demonstrated that any such defined excursions are totally unavoidable. This will have to include the duration, frequency, and the type and amount of air contaminants emitted during the excursion.

In order to meet the November 1989 deadline for permit issuance, it is requested that response to March 15, 1988 letter (which was due on 7/1/88) be submitted to the department as soon as possible.

AUG 16 1988

If you have any questions, please contact Sunila Agrawal of my staff at (609) 292-9880.

Very truly yours,



Ernest J. Kuhlwein, Jr., Chief  
Bureau of Hazardous Waste Engineering

EP61/lm

cc: Barry Tornick, USEPA, Region II  
Frank Faranca-DHSM  
Vincent Krisak-CFO  
Milt Polakovic-DEQ  
Kevin Day-Commanding Officer  
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