

Email from Col. Stuckey to Dialogue on 2/27/15

CLASSIFICATION: UNCLASSIFIED

Mickey,

We have provided M6 Propellant in another instance to support a vendors conceptual plan to dispose of this material, so it can be done but is a pretty lengthy process. I will attempt to summarize the process:

Step 1 - The initial request will need to come from the Dialogue Committee. This helps keep it separate from our contracting process.

Step 2 - The vendor will need to inform LMD in writing how much they need and for what purpose.

Step 3 - We will then seek EPA approval, since they have oversight for this material. EPA will be required to provide written approval.

Step 4 - The vendor will need to acquire an ATF and LSP explosive license.

Step 5 - The vendor will need to provide a Safety plan that will require EPA approval. The plan needs to include as a minimum

- How the material will be handled, packaged, transported and tested.
- How they will insure the safety of any and all personnel who are handling

the material during the study.

Step 6 - LDEQ requirements for 33:V.105.D.6. Treatability studies

- Vendor or test facility notifies LDEQ no less than 45 days before study commences. LDEQ may be able to expedite this.
- Vendor or test facility will need to acquire an EPA ID number.
- EPA ID number is limited to no more than 1000 kg of non-acute hazardous waste

- Copy of study must be provided to LDEQ

- Vendor must provide copy of all paperwork/shipping papers associated with the transportation of the sample materials.

- See LAC 33:V.105.D.6.g for other records that need to be maintained.
- Final disposition of any residues and unused samples

Step 7 - LMD requirements

- Transfer of ownership from LMD to vendor
- Hold harmless agreement
- Proof of liability insurance
- Copy of test results
- Certificate of destruction

And lastly, if the material has to be shipped over public roads, a stability test must be conducted and the vendor must have a U.S. DOT approved competent authority.