



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202 - 2733

Office of the Regional Administrator

January 13, 2015

The Honorable David Vitter
United States Senate
Washington, D.C. 20510

Dear Senator Vitter:

Thank you for your letter dated January 12, 2015, and the delegation's continued support to address the deteriorating M-6 propellant stored at the Camp Minden site in Webster Parish. Enclosed are the EPA's responses to the questions you posed to the EPA and LDEQ Secretary Peggy Hatch. Secretary Hatch will respond under a separate cover letter and is copied on my response.

The EPA takes the community concerns seriously and are working to address them as quickly as possible. We continue to make information publicly available at www.epa.gov/region6 and at the local Minden library. We will continue to keep the website and local repository updated.

Last Friday, in response to local concerns about controlled open burning in metal burn trays, we reiterated the federal requirement to conduct a trial burn and committed to making the data public prior to the full-scale operations to dispose of the M-6 propellant at the site. EPA will coordinate closely with the Louisiana Military Department (LMD), the Louisiana State Police (LSP), and the Louisiana Department of Environmental Quality (LDEQ) to develop the necessary steps and requirements for the trial burn to ensure the protection of public health and the environment and to monitor the impact on the air, water and soil.

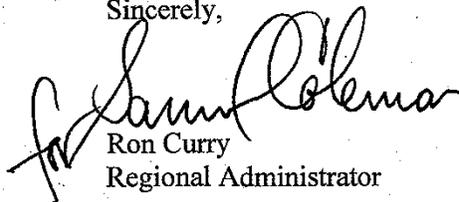
We recognize the importance of coordination between the EPA, LDEQ, LMD, LSP, and local state officials and the opportunities to make improvements. Yesterday, we renewed our commitment by conducting a coordination call between LMD, LSP, LDEQ and the EPA to better align communications and review our upcoming work. We also agreed to another community meeting in Shreveport with invited guests from the U.S. Department of Army with first-hand experience in controlled open burning in metal trays at other locations in the United States. We will alert your offices to the meeting logistics as soon as they are confirmed.

Today, each of the response agencies are sending representatives to a meeting with local state officials in Shreveport. As you requested, we are committed to continuing this coordination as we move forward. The EPA, LDEQ, LMD, and LSP remain confident that the controlled open burning in metal burn trays is the most protective, efficient and effective remedy for the 15 million pounds of deteriorating M-6 propellant at the Camp Minden site in Webster Parish. We are working expeditiously to ensure public safety as advised by the Army Explosive Safety Board and continue to anticipate operation to be well underway before August 2015.

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Again, thank you for your continued support in addressing the public health threat posed by the M-6 propellant stored at Camp Minden. We remain committed to working closely with you in addressing constituent concerns and answering questions. Please feel free to contact me at (214) 665-2100, or your staff may contact Ms. Lawanda Thomas, Congressional Liaison, at (214) 665-7466.

Sincerely,



Ron Curry
Regional Administrator

Enclosure

cc: Ms. Peggy Hatch
Secretary, Louisiana Department of Environmental Quality

Identical letters sent to: The Honorable Bill Cassidy
United States Senate

The Honorable John Fleming
House of Representatives

The Honorable Ralph Abraham
House of Representatives

Region 6 Response to Senator Vitter's January 6, 2015 Letter

1. **Question:** The EPA previously completed a bench-scale burn of the materials to evaluate the physical and chemical properties as well as determine air monitoring requirements before any large scale activity. Will the EPA provide the data it has collected on the methods examined? Will the EPA share with my office its comparison of potential health hazards to verify that the open burn is the safest way?

Response: The Louisiana State Police and the Louisiana Military Department completed a bench-scale burn of the materials in December. EPA conducted monitoring to help evaluate the physical and chemical properties of as well as determine air monitoring requirements. EPA provided monitoring results to the public at its public meeting held on December 16 in Minden. A copy of monitoring information is attached.

EPA is also providing copies of information collected on the methods examined to destroy materials at the Camp Minden site, including information regarding the potential environmental and public health hazards. EPA believes that the proposed approach is the most effective and efficient remedy available.

Attached to this letter is a complete copy of the administrative record which contains the basis for EPA's decisions at Camp Minden and provides the requested information. A complete copy of the administrative record is available to the public at the Minden library and information is also available on our public website at www.epa.gov/region6.

The Army's Explosive Safety Board advised EPA in 2013 that the M-6 could begin to rapidly deteriorate and present an increased risk of auto detonation in as little as two years. EPA assessed alternatives for their safety, environmental impact and potential to remove the explosion risk quickly. Based on its review, EPA, with input from the Army and other agency programs, selected controlled open burning using burn trays.

The potential environmental impact of this approach is summarized below:

AIR POLLUTION: Emission studies of M-6 propellant open burning conducted by the Army, the USEPA and the Canadian EPA show the following total emissions expected from burning the M-6 propellant.

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**TOTAL POUNDS OF EMISSIONS
FROM BURNING 15 MILLION POUNDS OF M-6***

GAS	POUNDS EMITTED
NON-METHANE HYDROCARBONS:	
• Diphenylamine	0.004
• 2,4 & 2,6 dinitrotolulene	0.017
• Aromatic hydrocarbons	26.650
• Other hydrocarbons	<u>221.000</u>
Subtotal, Non-methane HC	<250.000
OTHER GASSES	
• Methane	690
• Carbon Monoxide	1,425
• Nitrogen Oxide	36,000
• Nitrogen Dioxide	78,000
• Carbon Dioxide	<u>15,900,000</u>
Subtotal, Other Gasses	16,016,115

* Emission Factors contained in DPG Document No. DPG-TR-96-008b, April 1998, Open Burn/Open Detonation Dispersion Model (OBODM) User's Guide, Volume II. Technical Description

Less than 250 pounds of non-methane hydrocarbons are expected to be emitted from the burning of the M-6 propellant even though the unburned M-6 contains roughly 10% of dinitrotolulene. Because of the high rate of combustion and M-6 propellant does not contain toxic metals or chlorinated compounds, which if present could produce dioxins, emissions will not pose a toxic air pollution risk to the community outside the worker safety zone.

The quantities of carbon monoxide, nitrogen dioxide and carbon dioxide will not pose a toxic air pollution risk outside the worker safety zone. The contractor selected for the disposal will be required to conduct sampling. EPA and LDEQ will conduct independent sampling to ensure the environment and public health are protected.

The December 2014 bench-scale burn of M-6 propellant was conducted to determine the physical and chemical properties of the material and help determine air monitoring requirements before any large scale activity. A test burn will be also conducted to verify the air modeling results and air quality emissions.

SOIL CONTAMINATION; The controlled open burning using burn trays will burn thin layers of M-6 on metal burn trays over impermeable pads which eliminates contact with soils. These burn trays and impermeable pads will be specifically designed and constructed to prevent the release of contaminants to the soil and groundwater. The analytical protocol requires confirmatory sampling of soils and residue to ensure that soils are not contaminated.

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WATER POLLUTION: Controlled open burning on metal burn trays over impermeable pads is designed to greatly reduce any water pollution. If any water runoff is created by this process it will be contained, analyzed, and if necessary treated before determining safe disposal.

OTHER CONSIDERATIONS: Controlled open burning on metal burn trays is proven disposal approach in the Open Burn/Open Detonation guideline. [It can be implemented in a relatively short period of time and does not require new research.]

2. **Question:** Has an Environmental Impact Study (EIS) been conducted? Has the EPA granted an exemption to an EIS to the US Army, LMD, or other involved parties?

Response. NEPA does not require an Environmental Impact Statement for CERCLA time-critical response actions. EPA has not granted any exemptions to NEPA, this clean up action is being conducted under a CERCLA Administrative Order and Settlement Agreement.

3. **Question:** According to official documents, on June 5, 2014, the LSP, in coordination with the LMD, conducted a training exercise which consumed the 128 lbs. of black powder previously owned by Explo Systems and listed on the inventory provided by the ESB. Was this instance the "bench scale burn" completed for evaluation purposes and, if so, was the test burn announced prior to the trial burn?

Response. The June 5, 2014, training exercise involved black powder, not M6 and therefore is not part of any M6 analysis. We requested that the Louisiana State Police make any information they have in regards to this activity available to the public.

4. **Question:** The EPA's publicly available documents which reference the disposal process state that "should the open burning response action generate hazardous waste residues requiring off-site disposal..." Does the EPA have data or estimated prediction on the likelihood of this outcome? What is the public health hazard associated with it?

Response. There will be a small amount of residue from the burn left in the burn tray. To ensure that the waste is treated appropriately, it will be sampled and properly disposed of based on the sampling results. In addition to the M-6 propellant, there are pallets, boxes, drums, charge bags, strapping, etc. located at the site. This material will also be profiled for recycling, reuse, or disposal.

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5. **Question:** On page 14 of the EPA's "Request for Approval of a Time-Critical Removal at the Explo Systems" it states that previous materials disposed of through onsite open burning was analyzed and will be disposed of at an appropriately permitted facility and a that final report of the operations is pending. Is this final report now available? Does that report contain health hazard information? If so, please provide a copy for my office to review.

Response. These activities were conducted outside of the CERCLA Administrative Order and Settlement Agreement. LSP and LMD conducted these activities and is developing the final report. EPA has notified Louisiana Military Department of your request for a copy of the report and information.

6. **Question:** Lastly, can you confirm that both EPA and the Louisiana Department of Environmental Quality will continue to check air quality and potential groundwater contamination during the burning process as previously stated? Will that take place as an EIS, risk assessment or air modeling study?

Response. EPA and the LDEQ are committed to keeping the public informed and assuring that all work at Camp Minden is conducted safely and without adverse impacts. EPA and LDEQ will provide environmental oversight of the cleanup of M-6 propellant at Camp Minden as described above. The authority for this oversight is a Settlement Agreement between EPA, LMD, the U.S. Army and LDEQ, and approved by DOJ, pursuant to Sections 104, 106 (a), 107, and 122 of the Comprehensive Environmental Response Compensation and Liability Act of 1980, 42 U.S.C. §§ 9604, 9606 (a), 9607 and 9622. CERCLA time critical response actions are not required to conduct EIS under NEPA Assessments of risks and alternatives were part of the basis for the Settlement Agreement and are contained in the Administrative Record.

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