

**GENERAL DYNAMICS**  
Ordnance and Tactical Systems

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SUPERFUND DIV.  
DIRECTOR'S OFC.

June 6, 2013

Via Federal Express

Ms. Cynthia Brown, Removal Enforcement Coordinator  
Superfund Enforcement Assessment Section (6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Re: Explo Site, Minden, Louisiana

Dear Ms. Brown:

Enclosed is the Response of General Dynamics Ordnance and Tactical Systems, Inc. ("GD-OTS") to the CERCLA 104(e) Information Request (dated May 10, 2013) related to the above-referenced site.

Please contact me at 727.465.6868 with any questions.

Sincerely,



 Elaine B. Mills  
Associate General Counsel  
Admitted in Michigan and California only

11399 16<sup>th</sup> Court North, Suite 200  
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**General Dynamics Ordnance and Tactical Systems, Inc. "GD-OTS"**

**Explo Systems, Inc., Minden, Louisiana**

**PARTIAL RESPONSE to CERCLA 104(e) Information Request  
(dated May 10, 2013)**

**June 6, 2013**

**General Dynamics Ordnance and Tactical Systems, Inc. (“GD-OTS”)**

**CERCLA 104(e) Response**

**Explo Systems, Inc., Minden, Louisiana (“Explo Site”)**

**BACKGROUND**

The United States Environmental Protection Agency (“EPA”) directed a Request for Information pursuant to Section 104(e) of CERCLA (the “Request”) dated May 10, 2013 to General Dynamics Ordnance and Tactical Systems, Inc. related to the Explo Site that apparently operated from approximately November 2006 to October 2012. EPA agreed to an extension to June 7, 2013 to respond to this Request.

GD-OTS desires to provide EPA with the information it has requested. At EPA’s request, GD-OTS previously provided a Partial Response dated May 23, 2013. This response is in addition to the Partial Response.

**GENERAL OBJECTIONS AND COMMENTS**

GD-OTS makes the following general objections and comments to the Request. GD-OTS’s investigation into this matter is continuing and GD-OTS reserves the right to supplement this response if additional or correcting information or documents become available. GD-OTS also reserves all rights to contest the appropriateness of EPA’s Request and the specific information sought in any particular question of the Request. GD-OTS specifically reserves its rights to object to the Request on the basis that portions of it are unduly burdensome, overboard, vague, and unreasonable in the light of the waste-related data sought. GD-OTS objects to this Request to the extent it seeks information beyond the 2006 to 2012 time period. GD-OTS also objects to this information request to the extent it seeks information beyond any matters related to the Explo Site. In addition, GD-OTS objects to the production of confidential information. Such information is limited to specific confidential business information (as may be indicated in the responses below or documents provided), is kept confidential by GD-OTS and its contractors/subcontractors, and disclosure of such confidential information would result in harm to GD-OTS’s business. GD-OTS requests that such confidential information remain permanently confidential. Nothing in these responses should be considered to be an admission of liability by GD-OTS for any matter addressed in the Request; and, in addition, GD-OTS believes

that another entity has responsibility for potential responsibility that GD-OTS may have related to this site.

These responses were prepared with the assistance of:

**Tamara Johnson, Manager  
General Dynamics Ordnance and Tactical Systems, Inc.  
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**Steve Howard, Contracts Manager  
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**Dan Maloney, Supply Chain Operations Manager  
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**William Matthews, Principal Engineer  
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**Wilfried Meyer, Director of Business Development  
General Dynamics Ordnance and Tactical Systems, Inc.  
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**John Adams, Principal Engineer  
General Dynamics Ordnance and Tactical Systems, Inc.  
11399 16<sup>th</sup> Court North, Suite 200  
St. Petersburg, FL 33716**

## **RESPONSES**

EPA's Questions are stated below in bold. Responses to the questions are in non-bold type. Referenced documents are listed and begin with the designation "GD-OTS-EPA." Referenced

documents (GD-OTS-EPA1 to GD-OTS-EPA611) were previously provided with GD-OTS's Partial Response; only documents not previously produced are included herewith.

- 1. What materials did General Dynamics send to Explo Systems, Inc.? Did any of those materials contain ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal or any Tritonal mixture?**

Response:

As noted in Response No. 4 below, GD-OTS had two contracts that involved Explo Systems, Inc.: Army Contract W52P1J-05-C-0075 (*GD-OTS-EPA1 - GD-OTS-EPA328*), related to Explo Purchase Order No. 11799 (*GD-OTS-EPA457 - GD-OTS-EPA522*); and Army Contract W52P1J-11-C-0027 (*GD-OTS-EPA329 - GD-OTS-EPA456*), related to Explo Purchase Order No. 20384 (*GD-OTS-EPA523 - GD-OTS-EPA581*).

*W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):*

As described in Response No.12 below, GD-OTS did not send any materials to Explo Systems, Inc. pursuant to Army Contract W52P1J-05-C-0075, related to Explo Purchase Order No. 11799. Under this contract, the Army, not GD-OTS, sent 30,144 M117 bombs (also referred to as F114 bombs) and 3,028 F127 bombs (also referred to as MK84 bombs) to Explo Systems, Inc. for demilitarization (demil). See Response No. 5 below regarding constituents of these bombs.

*W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):*

With regard to Army Contract W52P1J-11-C-0027, related to Explo Purchase Order No. 20384, 217,973 lbs. of M30 propellant was sent to Explo Systems, Inc. for recycling. M30 propellant contained, nominally, 28% nitrocellulose. See also Response No. 5 below regarding constituents.

- 2. What was the recycling, treatment or disposal process for these materials once Explo Systems Inc. accepted the shipments? Provide information and documentation describing the recycling, treatment, or disposal process regarding materials containing ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal or any Tritonal mixture?**

Response:

*W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):*

With regard to Army Contract W52P1J-05-C-0075 and Explo Purchase Order No. 11799, 30,144 M117 bombs (also referred to as F114 bombs) and 3,028 F127 bombs (also referred to as MK84 bombs) were sent to Explo Systems, Inc. for demilitarization pursuant to the Ammunition Demilitarization and Disposal Plan For 750 lb M117A2 and

2000lb MK84 Bombs (“ADDP for Bombs”) (GD-OTS-EPA612 to GD-OTS-EPA645) and the Statement of Work (SOW) (Attachment C to Purchase Order No. 11799 (GD-OTS-EPA447 to GD-OTS-EPA522). See also attached documents GD-OTS-EPA693-GD-OTS-EPA697. GD-OTS is not aware of the specific processes used by Explo Systems, Inc. Explo Systems, Inc. provided GD-OTS with Certificates of Destruction (see Response No. 7 below) that indicated completion of the demilitarization process for these bombs. Additionally, see the close out documentation (GD-OTS-EPA609 to GD-OTS-EPA610) indicating that all bombs were “successfully processed according to Explo’s ADDP and GD’s SOW” and that “as of 31 December 2011, all energetic and components for this contract have been disposed of and shipped off site” by Explo Systems, Inc. Also enclosed is a May 8, 2013 letter from Explo indicating that “Explo complied with all laws and regulations related to its services” under Purchase Order No. 11799 (GD-OTS-EPA646 to GD-OTS-EPA647).

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

With regard to Army Contract W52P1J-11-C-0027 and Explo Purchase Order No. 20384, M30 propellant was sent to Explo Systems, Inc. for recycling pursuant to the Ammunition Demilitarization and Disposal Plan for Depleted Uranium Ammunition Demil Line 105mm Depleted Uranium Cartridges (“ADDP for DU Cartridges”) (GD-OTS-EPA648 to GD-OTS-EPA680) and the Statement of Work (SOW) (Attachment to Purchase Order No. 20384, GD-OTS-EPA580 to GD-OTS-EPA581). Note that the ADDP for DU Cartridges relates to the complete demilitarization and disposal process, which is a series of steps that includes sending the propellant (resulting from the demil process) to a recycler (such as Explo Systems, Inc.) for recycling. Page 9 of the ADDP for DU Cartridges (GD-OTS-EPA658) is a flow chart that lists the various steps in the complete demilitarization and disposal process. (Explo’s recycling role relates to the two steps in the flow chart listed under “Package Propellant for Shipment to Recycler.”) GD-OTS is not aware of the specific processes used by Explo Systems, Inc. In addition, Explo Systems, Inc. provided GD-OTS with End Use Certificates (see Response No. 7 below) regarding disposition of material related to this Purchase Order. Also enclosed is a May 8, 2013 letter from Explo indicating that “Explo complied with all laws and regulations related to its services” under Purchase Order No. 20384 (GD-OTS-EPA646-GD-OTS-EPA647).

- 3. What use was made of the materials once they were accepted by Explo Systems, Inc? Provide information and documentation concerning the planned use, demilitarization, and disposal of any conventional weapons or materials received by Explo Systems from General Dynamics. Please provide copies of all contracts, sub-contracts and agreements you have with Explo Systems, Inc. that include activities**

**pertaining to containing ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal, Tritonal mixtures, and M6 Propellant.**

Response:

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):

With regard to Army Contract W52P1J-05-C-0075 and Explo Purchase Order No. 11799, 30,144 M117 bombs (also referred to as F114 bombs) and 3,028 F127 bombs (also referred to as MK84 bombs) were sent to Explo Systems, Inc. for demilitarization pursuant to the ADDP for Bombs (GD-OTS-EPA612 to GD-OTS-EPA645) and the Statement of Work (SOW) (Attachment C to Purchase Order No. 11799, GD-OTS-EPA447 to GD-OTS-EPA522). See also attached documents GD-OTS-EPA693 to GD-OTS-EPA697. GD-OTS is not aware of the specific use made of the materials by Explo Systems, Inc. See also Response No. 2 above regarding completion of the Purchase Order and Response No. 4 below regarding contracts.

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

With regard to Army Contract W52P1J-11-C-0027 and Explo Purchase Order No. 20384, M30 propellant was sent to Explo Systems, Inc. for recycling pursuant to the ADDP for DU Cartridges (GD-OTS-EPA648 to GD-OTS-EPA680) and the Statement of Work (SOW) (Attachment to Purchase Order No. 20384, GD-OTS-EPA580 to GD-OTS-EPA581). GD-OTS is not aware of the specific use made of the materials by Explo Systems, Inc. See also Response No. 2 above regarding completion of the Purchase Order and Response No. 4 below regarding contracts.

4. **Please provide copies of all contracts, sub-contracts, or agreements you have with the Department of Defense-Army that include activities pertaining to ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal, Tritonal mixtures, and M6 Propellant.**

Response: GD-OTS objects to this question to the extent it seeks information beyond any matters related to the Explo Site. See the following enclosed documents related to:

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799) -

Army Contract W52P1J-05-C-0075 (GD-OTS-EPA1 - GD-OTS-EPA328)  
Explo Purchase Order No. 11799 (GD-OTS-EPA457 - GD-OTS-EPA522)

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384) -

Army Contract W52P1J-11-C-0027 (GD-OTS-EPA329 - GD-OTS-EPA456)  
Explo Purchase Order No. 20384 (GD-OTS-EPA523 - GD-OTS-EPA581 and GD-OTS-EPA681- GD-OTS-EPA687). Please note that Attachments E and F to Purchase Order

No. 20384 were not previously provided and are enclosed with these Responses (*GD-OTS-EPA681 to GD-OTS-EPA687*).

5. **Provide an explanation as to the source of the ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal and/or Tritonal mixtures, such as type of munitions or equipment that contained the materials, that General Dynamics sent or caused to be sent to Explo Systems.**

Response:

*W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):*

See Response Nos. 11 and 12 below; GD-OTS did not send materials to Explo Systems, Inc. With regard to Army Contract W52P1J-05-C-0075 and Explo Purchase Order No. 11799, as noted in Response No. 2 above, 30,144 M117 bombs (also referred to as F114 bombs) and 3,028 F127 bombs (also referred to as MK84 bombs) were handled by Explo Systems, Inc.

- The M117 bombs: The M117 (or F114) bombs contained Tritonal, which is typically a mixture of 80% TNT and 20% aluminum powder. The source of the Tritonal is the bombs; the Tritonal is down-loaded from the bombs during the demilitarization process.
- The F127 bombs (also referred to as MK84 bombs): The F127 (or MK84) bombs do not contain any of the substances listed in Question No. 5. (The F127 (or MK84) bombs have the explosive filler, Composition H6. The source of the Composition H6 is the bombs; the Composition H6 is down-loaded from the bombs during the demilitarization process.)

*W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):*

With regard to Army Contract W52P1J-11-C-0027 and Explo Purchase Order No. 20384, as noted in Response No. 2 above, 217,973 lbs. of M30 propellant was handled by Explo Systems, Inc. The M30 propellant (that contained, nominally, 28% nitrocellulose) came from GD-OTS's Marion, Illinois facility. As part of a demilitarization operation at the Marion, Illinois facility, M30 propellant was down-loaded from 105mm APFSDS-T M774 cartridges P/N 9329513 (DODIC C523). Only the M30 propellant from this process went to Explo Systems, Inc. (for recycling).

6. **Provide copies of all manifests, shipping/transportation information showing the volume of explosives, materials, and/or munitions delivered to Explo Systems, and the date they were delivered to Explo Systems.**

Response:

*W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):*

GD-OTS has no manifest or shipping/transportation documentation related to Army Contract W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799). All such shipping was handled by the Army. See also Response Nos. 11 and 12 below.

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

Straight Bills of Lading numbered *GD-OTS-EPA582 - GD-OTS-EPA587* related to Army Contract W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384). These Straight Bills of Lading indicate shipment of 217,973 lbs. of M30 propellant. See also Responses Nos. 11 and 12 below.

**7. Provide copies, and/or documentation of all certificates of destruction or certification concerning the sale, reuse or recycling of materials, conventional weapons, and munitions received from the U.S. Army under the 2005 contract between the Army and General Dynamics.**

Response: GD-OTS objects to this question to the extent it seeks information beyond any matters related to the Explo Site. GD-OTS also assumes that U.S. Army 2005 contract refers to Contract W52P1J-05-C-0075. The following response is provided:

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):

- Purchase Order No. 11799 reflects a total of 30,143 M117 bombs and 3,028 F127 High Range bombs awarded to Explo under Contract W52P1J-05-C-0075:
  - Please see the Excel Spreadsheet *GD-OTS-EPA604 - GD-OTS-EPA608* for the list of Certificates of Destructions related to all items related to Purchase Order No. 11799.
  - Note that the Excel Spreadsheet shows that 30,144 bombs were demilitarized. The government gave GD-OTS one additional bomb that Explo also demilitarized pursuant to Explo Purchase Order No. 11799.
  - Copies of all of the Certificates of Destruction related to Purchase Order No. 11799 are attached (see documents on CD that is numbered *GD-OTS-EPA611*).
  - Documents reflecting the close out of Explo's Purchase Order No. 11799 are enclosed (*GD-OTS-EPA609- GD-OTS-EPA610*)
  - See also See also document May 8, 2013 letter from Explo Systems, Inc. (*GD-OTS-EPA646 to GD-OTS-EPA647*)

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

In addition, although not related to the 2005 Contract (Contract W52P1J-05-C-0075), we are providing information with regard to Contract W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384). Enclosed are End User Certificates ("EUC and End User Certificates of Receipt ("EUCR") (*GD-OTS-EPA588 - GD-OTS-EPA603*) that indicate:

- Purchase Order No. 20384 reflects a total 217,973 lbs. of M30 propellant awarded to Explo under Contact W52P1J-11-C-0027:
  - EUCR 10 reflects 26,161 lbs. of M30 propellant received and dispositioned by Explo on their EUC # ES001

- EUCR 20 reflects 36,466 lbs. of M30 propellant received and dispositioned by Explo on their EUC # ES002
- EUCR 21 reflects 36,461 lbs. of M30 propellant received and dispositioned by Explo on their EUC # ES003
- EUCR 39 reflects 36,117 lbs. of M30 propellant received and dispositioned by Explo on their EUC # ES004
- EUCR 47 reflects 36,224 lbs. of M30 propellant received and dispositioned by Explo on their EUC # ES005 – the de minimis amount of the three pounds difference in Explo EUC # ES005 and EUCR 47 is likely the result of using different sized drums with slightly different tare weights. The production line does not stop and reset the weight with each new drum; instead, they use a common weight for each drum. This likely easily caused the 3 lb. variance.
- EUCR 60 reflects 36,544 lbs. of M30 propellant received and dispositioned by Explo on their EUC # ES006
- The total amount of M30 propellant that was shipped to Explo pursuant to Purchase Order No. 20384 matches the total amount of M30 propellant that Explo confirmed it dispositioned; 217,973 lbs.
- See also document May 8, 2013 letter from Explo Systems, Inc. (GD-OTS-EPA646 to GD-OTS-EPA647)

**8. Provide documentation of all insurance policies which General Dynamics has/had which would cover environmental liability concerning activities and/or work required under the 2005 contract with the Army.**

Response: GD-OTS assumes that the 2005 contract with the Army refers to Contract W52P1J-05-C-0075.

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):

GD-OTS is not aware any insurance which would potentially cover environmental liability concerning activities and/or work under this contract.

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

In addition, although not related to the 2005 Contract (Contract W52P1J-05-C-0075), we are providing information with regard to Contract W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384). Please see Section 13.h of the Terms and Conditions attached to Purchase Order No. 20384 (GD-OTS-EPA530). GD-OTS is not aware any other insurance which would potentially cover environmental liability concerning activities and/or work under this contract

**9. Provide information and documentation describing the composition of any of the conventional weapons per the 2005 contract with the Army, which contained or generated the ammonium picrate, M30 propellant, other propellants, potassium**

**nitrate, nitrocellulose, Tritonal and/or Tritonal mixtures that General Dynamics sent to the Explo Site.**

Response: GD-OTS assumes that the 2005 contract with the Army refers to Contract W52P1J-05-C-0075. GD-OTS objects to this question as GD-OTS did not send any materials to the Explo Site under Contract W52P1J-05-C-0075. The following response is provided:

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):

With regard to Army Contract W52P1J-05-C-0075 and Explo Purchase Order No. 11799, as noted in Response No. 2 above, 30,144 M117 bombs (also referred to as F114 bombs) and 3,028 F127 bombs (also referred to as MK84 bombs) were sent by the Army and handled by Explo Systems, Inc.

The M117 bombs: The M117 bombs (also referred to as F114 bombs) contained Tritonal, which is typically a mixture of 80% TNT and 20% aluminum powder. The source of the Tritonal is the bombs; the Tritonal is down-loaded from the bombs during the demilitarization process. See ADDP for Bombs (GD-OTS-EPA612 to GD-OTS-EPA645); page 5 of the ADDP for Bombs discusses bomb components.

The F127 bombs (also referred to as MK84 bombs): The F127 (or MK84) bombs do not contain any of the substances listed in Question No. 9. See also Response No. 5 above.

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

In addition, although not related to the 2005 Contract (Contract W52P1J-05-C-0075), we are providing information with regard to Contract W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384). As noted in Response No. 2 above, 217,973 lbs. of M30 propellant was handled by Explo Systems, Inc. The M30 propellant (that contained, nominally, 28% nitrocellulose) came from GD-OTS's Marion, Illinois facility. As part of a demilitarization operation at the Marion, Illinois facility, M30 propellant was down-loaded from 105mm APFSDS-T M774 cartridges P/N 9329513 (DODIC C523). Only the M30 propellant from this process went to Explo Systems, Inc. See ADDP for DU Cartridges (GD-OTS-EPA648 to GD-OTS-EPA680); page 5 of the ADDP for DU Cartridges discusses components.

**10. Provide information and documentation describing the composition of any of the conventional weapons per the 2005 contract with the Army, which contained or generated the ammonium picrate, M30 propellant, other propellants, potassium**

**nitrate, nitrocellulose, Tritonal and/or Tritonal mixtures that was sent to a General Dynamics facility.**

Response: GD-OTS assumes that the 2005 contract with the Army refers to Contract W52P1J-05-C-0075. Additionally, GD-OTS objects to this question to the extent it seeks information beyond any matters related to the Explo Site. Without waiving any objections, GD-OTS responds that, under Army Contract W52P1J-05-C-0075, Improved Conventional Munitions (ICMs) and 105mm Illuminating Cartridges were sent by the Army to GD-OTS's Joplin, Missouri facility for incineration. The propellant contained in the ICMs and Illuminating Cartridges was fully disposed of by incineration at GD-OTS's Joplin, Missouri facility. The Explo Site never received and was not involved with these ICMs or Illuminating Cartridges.

**11. Provide information and documentation describing the transport, demilitarization, and/or disposal of conventional weapons which contained or generated ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal that General Dynamics sent to the Explo facility.**

Response:

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):

With regard to Army Contract W52P1J-05-C-0075 and Explo Purchase Order No. 11799, GD-OTS was not involved with the transport of materials to Explo Systems, Inc. and no materials were sent by GD-OTS to the Explo facility. The Army was responsible for the shipments to Explo Systems, Inc., and Section 14.3 of Contract W52P1J-05-C-0075, Government Furnished Material (GFM), provides that: "Ammunition shipped to a contractors site(s) will be shipped at Government expense by the most economical means possible. The method of transportation will be determined by the Government, which may include motor vehicle and/or rail transportation for shipments within the continental United States (CONUS)." GD-OTS has no transportation records for this contract. See also Response Nos. 2 and 7 regarding demilitarization and/or disposal.

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

With regard to Army Contract W52P1J-11-C-0027, related to Explo Purchase Order No. 20384, the M30 propellant was generated in a demilitarization process by GD-OTS at a GD-OTS Marion, Illinois facility. The ADDP for DU Cartridges (GD-OTS-EPA648 to GD-OTS-EPA680) describes the process by which the M30 propellant was generated at the GD-OTS facility. Only the generated M30 propellant (see Response Nos. 1 and 9 above) was sent from GD-OTS' Marion, Illinois facility to Explo Systems, Inc. for recycling. The Straight Bills of Lading (see Response No. 6 above) relate to the transport of this M30 propellant to Explo Systems, Inc. See also Response Nos. 2 and 7 regarding demilitarization and/or disposal.

**12. Who was responsible for transporting and selecting the site for demilitarization and disposal of the ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal and/or Tritonal mixtures. Provide supporting documentation. Who transported the materials, and who paid for the transportation? Provide supporting documentation.**

Response:

W52P1J-05-C-0075 (related to Explo Purchase Order No. 11799):

With regard to Army Contract W52P1J-05-C-0075 and Explo Purchase Order No. 11799, GD-OTS was not involved with the transport of materials to Explo Systems, Inc. The Army was responsible for the shipments to Explo Systems, Inc., and Section 14.3 of Contract W52P1J-05-C-0075, Government Furnished Material (GFM), provides that: "Ammunition shipped to a contractors site(s) will be shipped at Government expense by the most economical means possible. The method of transportation will be determined by the Government, which may include motor vehicle and/or rail transportation for shipments within the continental United States (CONUS)." GD-OTS has no transportation records for this contract.

Explo Systems, Inc. was selected by GD-OTS to perform bomb demilitarization for Contract W52P1J-05-C-0075. The Site Plan for Explo Systems, Inc. was approved for performance under Prime Contract W52P1J-05-C-0075 by the Army. See Army letters dated August 11, 2008 and October 4, 2010 (GD-OTS-EPA688 to GD-OTS-EPA689) and GD-OTS letter dated October 1, 2010 (GD-OTS-EPA690 to GD-OTS-EPA692). See also attached documents GD-OTS-EPA693 to GD-OTS-EPA697.

W52P1J-11-C-0027 (related to Explo Purchase Order No. 20384):

With regard to Army Contract W52P1J-11-C-0027 and Explo Purchase Order No. 20384, Explo Systems, Inc. was responsible for arranging and paying for freight of M30 propellant from the GD-OTS facility in Marion, Illinois to the Explo Systems, Inc. See Attachment E to Purchase Order No. 20384 (GD-OTS-EPA681 to GD-OTSEPA684) that provides that "Explo Systems (the subcontractor) will arrange and pay the freight charge for each shipment." Straight Bills of Lading (numbered *GD-OTS-EPA582 - GD-OTS-EPA587*) indicate shipment of 217,973 lbs. of M30 propellant to Explo Systems, Inc. for recycling. See also Response No. 6.

Explo Systems, Inc. was selected by GD-OTS to recycle the M30 propellant.



REPLY TO  
ATTENTION OF:

## UNCLASSIFIED

DEPARTMENT OF THE ARMY  
ARMY CONTRACTING COMMAND - ROCK ISLAND  
1 ROCK ISLAND ARSENAL  
ROCK ISLAND, IL 61299-8000

CCRC-AM

April 18, 2011

General Dynamics  
Ordnance and Tactical Systems  
11399 16<sup>th</sup> Court N. Suite 200  
St. Petersburg, FL 33716

Ms. Jagr,

Reference the Ammunition Demilitarization and Disposal Plan for the 750 lb and 2000 lb Bombs Revision 2 submissions for contract W52PlJ-05-C-0075 for the Demilitarization of Conventional Ammunition. GDOTS reference number JAG-11-034.

The Government has reviewed the 750 and the 2000 lb bombs Demil Plan revisions and has found them to be acceptable and in accordance with the contract.

Point of contact: Ann Hamerlinck, phone (309) 782-3946, email [ann.hamerlinck@us.army.mil](mailto:ann.hamerlinck@us.army.mil) or Christine Carson, phone (309) 782-4301, email [christine.carson@us.army.mil](mailto:christine.carson@us.army.mil).

Sincerely,

*Christine Carson* 2011.04.18  
14:35:29-05'00'

Christine Carson  
Procuring Contracting Officer

UNCLASSIFIED

# **GENERAL DYNAMICS**

## **Ordnance and Tactical Systems**

### **Ammunition Demilitarization and Disposal Plan For 750 lb M117A2 and 2000 lb MK-84 Bombs DODIC F114 – F127 – F272**

**Document No.: ADDP-Bomb-0001  
Revision 2**

**March 18, 2011**

Submitted to: Department of the Army  
Headquarters, U.S. Army Sustainment Command  
1 Rock Island Arsenal  
Rock Island, IL

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# TARGET SHEET

**SITE NAME:** EXPLO SYSTEMS INCORPORATED

**CERCLIS I.D.:** LAR000072223

**TITLE OF DOC.:** [GENERAL DYNAMICS ORDNANCE AND  
TACTICAL SYSTEMS INC PARTIAL RESPONSE TO  
104(E) REQUEST FOR INFORMATION]

**DATE OF DOC.:** 06/06/2013

**NO. OF PGS. THIS TARGET SHEET REPLACES:** 32

**SDMS #:** 9421083 **ORIGINAL DOC ID:** 9419690

**SENSITIVE ?**  **MISSING PAGES ?**

**ALTERN. MEDIA ?**  **CROSS REFERENCE ?**

**LAB DOCUMENT ?**  **LAB NAME:** \_\_\_\_\_

**ASC./BOX #:**

**CASE #:** \_\_\_\_\_ **SDG #:** \_\_\_\_\_

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NUMBERS 001891 THROUGH 001922. THIS DOCUMENT  
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9419690 IS LOCATED IN THE U.S. EPA REGION 6

**COMMENTS :** SUPERFUND RECORDS CENTER.



1600 Java Rd  
Minden, LA. 71055  
8 May 2013

General Dynamics  
Ordnance and Tactical Systems  
11399 16<sup>th</sup> Court N. Suite 200  
St. Petersburg, FL. 33716

Subject: Response to Disposition of material on W52P1J-05-C-0075 and W52P1J-11-C-0027

Attention: Dan P. Maloney

Dear Dan,

Explo Systems, Inc. official response to your request for information regarding the letter you received from the Department of the Army titled "Disposition of material on W52P1J-05-C-0075 and W52P1J-11-C-0027 is as follows.

Explo has complied with all laws and regulations related to its services under Purchase Orders No. 11799 and 20384. There has been no breach of our contractual obligations. Explo Systems has met all contractual obligations according to GD's SOW and submitted all required documentation to GD as required by contract. Further note that GD's Demil Team did its official Close-Out tour/Inspection and concluded its documentation for the close of Purchase Order No. 11799.

Explo Systems is an explosive recycle company. All of the materials identified in the DPM-13-035 are consider by Explo as components for commercial products. All of these products have been or will be removed from Explo's S Line production Facility by the determined date established by the present governing authorities.

Explo Systems did have M30 Propellant on its shipping dock that was observed by the Government Inspectors. This material had been recently removed from its original (properly) stored facility and was in process of being repacked properly for shipping to Explo's commercial customer. This material required proper repacking because of the inefficient packing condition it was received in from GD's Marion Demil Facility. Please note there is sufficient documentation to support these statements.

Explo Systems currently has 109,200 lbs. of M30 stored properly at its facility that has never been improperly stored.

Again, all material identified in the DPM-13-035 are products related to other Explo Commercial Projects.

Best Regards,

A handwritten signature in black ink, appearing to read "Ken Lampkin", followed by a long horizontal flourish.

Ken Lampkin  
Project Manager  
Explo Systems, Inc.

Cc. David Fincher  
David Smith  
Terry Wright

UNCLASSIFIED



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
ARMY CONTRACTING COMMAND – ROCK ISLAND  
1 ROCK ISLAND ARSENAL  
ROCK ISLAND, IL 61299-8000

CCRC-AM

May 01, 2012

Ms. Kelly Jagr  
General Dynamics  
Ordnance and Tactical Systems  
11399 16<sup>th</sup> Court N. Suite 200  
St. Petersburg, FL 33716

Dear Ms. Jagr,

Reference the Ammunition Demilitarization and Disposal Plan (ADDP) Rev 5 for CLIN 0001 DU Cartridges for contract W52P1J-11-C-0027 for the Demilitarization and Disposal of Conventional Ammunition, GDOTS reference number JAG-12-059.

The Government has reviewed the (ADDP) Rev 5 for CLIN 0001, DU, and has found it to be acceptable. The Demilitarization and Disposal Plan is approved for use on contract W52P1J-11-C-0027. Any deviations from this plan shall first be submitted to the PCO for review.

Point of contact: Ann Hamerlinck, phone (309) 782-3946, email [ann.hamerlinck@us.army.mil](mailto:ann.hamerlinck@us.army.mil) or Christine Carson, phone (309) 782-4301, email [christine.carson@us.army.mil](mailto:christine.carson@us.army.mil).

Sincerely,

Christine Carson  
Procuring Contracting Officer

# TARGET SHEET

**SITE NAME:** EXPLO SYSTEMS INCORPORATED

**CERCLIS I.D.:** LAR000072223

**TITLE OF DOC.:** [GENERAL DYNAMICS ORDNANCE AND  
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**DATE OF DOC.:** 06/06/2013

**NO. OF PGS. THIS TARGET SHEET REPLACES:** 36

**SDMS #:** 9421083 **ORIGINAL DOC ID:** 9419690

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**ALTERN. MEDIA ?**  **CROSS REFERENCE ?**

**LAB DOCUMENT ?**  **LAB NAME:** \_\_\_\_\_

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**COMMENTS :** SUPERFUND RECORDS CENTER.

# **GENERAL DYNAMICS**

## **Ordnance and Tactical Systems**

[Sent Certified Mail]

AG12-072

December 20, 2012

Explo Systems, Inc  
1600 Java Road  
Minden, LA 71055

Attention: Mr. Ken Lampkin, Program Manager

Subject: Partial Termination for Cause Notification: Purchase Order #20384

Reference:

- A. GD-OTS Letter AG12-063 dated October 18, 2012: "Explosion at Minden, LA Facility and Future Performance under PO #20384"
- B. Explo Letter Reply dated October 29, 2012: "Incident at Explo Systems, Inc. 15 October 2012"
- C. GD-OTS Letter DPM-12-056 dated November 29, 2012: "Show Cause Letter for Continued Performance under PO #20384"
- D. Email from Ken Lampkin, dated December 3, 2012: "Re: GD-OTS Letter DPM-12-056: Show Cause Letter for Continued Performance under PO#20384"
- E. General Dynamics Ordnance and Tactical Systems Standard Terms and Conditions Fixed-Price Supplies and Services Non-Commercial items, dated June 15, 2010 ["Attachment A" of Purchase Order #20384]

Mr. Lampkin-

Over the past several weeks, General Dynamics Ordnance and Tactical Systems (GD-OTS) has attempted to obtain information and assurances from Explo Systems, Inc. (Explo) regarding the storage of explosive material in accordance with applicable laws and regulations. Based on Explo's responses (Ref: B & D) to GD-OTS cure notice (Ref A) and GD-OTS Show Cause Letter (Ref C), Explo has failed to provide adequate assurances of the following:

- Written and unequivocal assurances that GD-OTS M30 Propellant was not involved in the inappropriate storage findings by Louisiana State Police and the Webster Parish Sheriff as stated in the article (and provide evidence, including photographs, explaining where the cited propellant originated, which GD-OTS can verify)
  - Although Explo sent GD-OTS a short email stating that our propellant was not involved, there was no information regarding the storage of propellant we delivered or whether it was being kept in accordance with applicable laws and regulations.
- Written and unequivocal assurance that GD-OTS M30 Propellant is currently being properly stored in accordance with applicable laws and regulations
  - We have received no response at all to this request, and based on the information we have, we are unable to assume that laws are being followed.
- Written, unequivocal and unconditional assurance that Explo will comply with the law and accept shipments from GD-OTS in accordance with agreed to schedules
  - Explo is currently unable to take shipments with no recovery plan
- Written, unequivocal and unconditional assurance that the issues identified in the published news articles will not result in Explo's inability to perform in accordance with the requirements of PO#20384 due to periodic, temporary, or permanent shut down of operations by government authority, accident, or otherwise;

11399 16<sup>th</sup> Court North, Suite 200  
St. Petersburg, FL 33716  
Tel: 727 578 8100  
www.gd-ots.com

PO #20384-0001  
"Attachment F"

GD-OTS-EPA685

- Explo has provided no response and is currently unable to take shipments and Explo has not provided GD-OTS with a recovery plan
- Certification and documented evidence that Explo is and has been following all applicable laws and regulations in the performance of PO#20384 with GD-OTS as stated in your Reference B. response letter.
  - Explo could have provided GD-OTS with a detailed explanation and photos of the storage of propellant delivered by GD-OTS, but elected not to do so.

As a result, Explo has left GD-OTS with no other option but to terminate, in part, the remaining items listed under Subcontract Purchase Order #20384. The terminated Clin's and Imn's are as follows:

- Clin 001 Imn 001, Propellant Recycle for 500,000 pounds (lbs) of M30 propellant
  - Note: To date Explo has accepted 217,970 lbs of propellant. This leaves a quantity of 282,030 lbs that GD-OTS being terminated from this order as a part of this partial termination.

In accordance with Reference E, Terms and Conditions, GD-OTS reserves the right to terminate the performance of work per Section 11 Compliance with Laws (page 3 of 20), Section 13 (h) Indemnification and Insurance (page 4 of 20) and Section 19b (a), Termination for Cause (page 6 of 20). Each clause states the following:

**11. Compliance with Laws**

*(a) General. Seller agrees to comply with all applicable laws, orders, rules, regulations and ordinances of government entities, whether or not such provisions are referenced elsewhere in this Purchase Order. Such compliance is agreed to be a material element of the performance of this contract.*

**13. Indemnification and Insurance**

*(h) Seller agrees that, upon delivery of materials by Buyer or as cause by Buyer as required under this Purchase Order, Seller shall take ownership of such materials and shall assume any and all responsibility for: (2) Complying with all laws and regulations applicable to proper handling, transportation, disposal and/or treatment of materials...*

**19b. Termination for Cause**

*(a) (1) "Buyer may... terminate this Purchase Order in whole or in part if Seller fails to (iii) Perform any of the other provisions of this Purchase Order.*

*(a) (2) "Buyer's right to terminate this Purchase Order under subdivision (1)(iii) of this clause, may be exercised if Seller does not cure such failure within ten (10) days after receipt of the notice from Buyer's representative specifying the failure"*

Should Explo provide the requested written and unequivocal assurances with documented evidence to support its claims, GD-OTS will agree to re-enter negotiations with Explo to the extent it is in a position to work with more than one supplier, with the following conditions:

1. Pricing as submitted by Explo in FFP Proposal #EXGD0011 Rev 2 dated 26 March 2012 shall be applicable to any future quantity of truckloads, although each truck/shipment will be limited to 36,000 lbs per shipment.
2. Explo's schedule capability must match GD-OTS' requirements.
3. Explo will provide GD-OTS the right of entry to inspect propellant and storage conditions after delivery, and/or provide documented evidence that all laws are being followed.
4. Explo shall provide GD-OTS with End User Name and Location as well as the intended use.

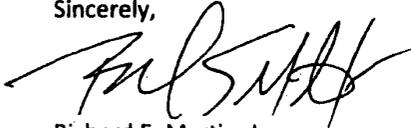
11399 16<sup>th</sup> Court North, Suite 200  
 St. Petersburg, FL 33716  
 Tel: 727 578 8100  
 www.gd-ots.com

PO #20384-0001  
 "Attachment F"  
 GD-OTS-EPA686

The partial termination of this subcontract is effective immediately. Explo is requested to provide acknowledgement of this partial termination within forty-eight (48) hours of receipt of this letter. GD-OTS reserves the right to any available remedy under the Purchase Order, to include without limitation re-procurement of Goods and/or Services from third parties and seeking the additional costs of re-procurement from Explo.

GD-OTS has enjoyed the working relationship with Explo and looks forward to working with Explo in the future.

Sincerely,



Richard E. Martin, Jr.  
Senior Director, Supply Chain Management

Cc: Amy Gimblet  
Tamara Johnson  
Dan Maloney  
Kevin McDonald  
Bryan Van Brunt



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U.S. ARMY SUSTAINMENT COMMAND  
1 ROCK ISLAND ARSENAL  
ROCK ISLAND, IL 61299-6500

ATTENTION OF:

REPLY TO

Conventional Ammunition Demil & FMS Contracting Team

AMSAS-ACA-R

11 August 2008

Mr. Bill Koepf  
Contract Administrator  
General Dynamics Ordnance and Tactical Systems  
11399 16<sup>th</sup> Ct North, Ste 200  
Saint Petersburg, FL 33716-2328

Dear Mr. Koepf:

References:

- a. Contract No. W52P1J-05-C-0075 for the Demilitarization of Conventional Ammunition
- b. GD-OTS Letter WTK08-180, dated 4 August 2008, Subject: Site Plan Submission for Explo Systems Inc., Minden, LA.
- c. AMSAS-ACA-R (Pat Lootens), dated 26 Jun 2007, Subject: Trinitrotoluene (TNT), Type III, Reclaimed Addendum - Explo Systems Safety Site Plan.

General Dynamics Ordnance and Tactical Systems' request for approval of the reference b. Explo Systems Inc. Site Plan, along with the reference c. supporting documentation has been reviewed by the Joint Munitions Command Safety Directorate and is hereby approved.

GD-OTS and Explo must comply with all existing safety requirements, including limits, controls and siting. Any increase in explosive limits/hazards or major modifications to this process or facility will require submission of a new site plan, in compliance with the contractual safety document, DoD 4145.26-M. This recommendation applies only to performance under the current demil contract.

Point of contact for this action is Mr. Brett Luchsinger at (309) 782-3869 or email [brett.luchsinger@us.army.mil](mailto:brett.luchsinger@us.army.mil).

Sincerely,

Kim M. Jones  
Procuring Contracting Officer

CF:  
Diane Wheeler, DCMA Springfield



REPLY TO  
ATTENTION OF:

**UNCLASSIFIED**

DEPARTMENT OF THE ARMY  
ROCK ISLAND CONTRACTING CENTER  
1 ROCK ISLAND ARSENAL  
ROCK ISLAND, IL 61299-8000

CCRC-AM

October 04, 2010

General Dynamics  
Ordnance and Tactical Systems  
11399 16<sup>th</sup> Court N. Suite 200  
St. Petersburg, FL 33716

Ms. Jagr,

Reference the 2000 lb Demil Explosive Site Safety Plan for Explo systems for contract W52P1J-05-C-0075. Reference JAG-10-096 for the Demilitarization of Conventional Ammunition.

The Government has reviewed and accepts the proposed change to the previously approved explosive safety site plan. The Government has found that this change does not impact on the previously approved and contractor controlled net explosive weight allowances for the 2000 lb. bomb processing at the EXPLO facility IAW DOD 4145.26-M/DOD 6055.09-STD.

Intraline distance protection (both barricaded and unbarricaded) does not provide the same level of personnel protection as Inhabited Building Distance in the event of an accidental explosion. Those permitted within Intraline distance of explosive operations/operating buildings will be exposed to what may be significant blast and overpressure hazards should an accidental detonation occur. These additional hazards as well as personnel restrictions are clearly identified in noted references. Contractors must assure only those personnel with a direct operational association to the project are permitted.

Point of contact: Ann Hamerlinck, phone (309) 782-3946, email [ann.hamerlinck@us.army.mil](mailto:ann.hamerlinck@us.army.mil) or Christine Carson, phone (309) 782-4301, email [christine.carson@us.army.mil](mailto:christine.carson@us.army.mil).

Sincerely,

*Christine Carson* 2010.10.04  
10:21:18 -05'00'

Christine Carson  
Procuring Contracting Officer

**UNCLASSIFIED**

GD-OTS-EPA689

# TARGET SHEET

**SITE NAME:** EXPLO SYSTEMS INCORPORATED

**CERCLIS I.D.:** LAR000072223

**TITLE OF DOC.:** [GENERAL DYNAMICS ORDNANCE AND  
TACTICAL SYSTEMS INC PARTIAL RESPONSE TO  
104(E) REQUEST FOR INFORMATION]

**DATE OF DOC.:** 06/06/2013

**NO. OF PGS. THIS TARGET SHEET REPLACES:** 3

**SDMS #:** 9421083 **ORIGINAL DOC ID:** 9419690

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**LAB DOCUMENT ?**  **LAB NAME:** \_\_\_\_\_

**ASC./BOX #:**

**CASE #:** \_\_\_\_\_ **SDG #:** \_\_\_\_\_

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**COMMENTS :** SUPERFUND RECORDS CENTER.

# **GENERAL DYNAMICS**

## Ordnance and Tactical Systems

August 1, 2008

Attachment: Consideration for Safety Site Plan for Explo Systems

Subject: Safety Site Plan for Explo Systems at Camp Minden  
(formally Louisiana Army Ammunition Plant)

Ref: DOD 4145.26M DOD Contractor's Safety Manual for Ammunition &  
Explosives, September 1997

General Dynamics Ordnance and tactical Systems (GD-OTS) is in the process of evaluating and approving Explo Systems, Inc., Minden, LA as a 2<sup>nd</sup> Source for contract WP52P1J-05-C-0075 for demilitarization of ammunition to include cutting 750 lb F114 Aircraft Bombs and removal of the bulk explosive material.

A description of the demilitarization process is as follows:

1. Bombs are received by truck at Building 1625 and off loaded by lift truck to Bay 2 in units of two per pallet and transported to cutting operation as needed.
2. Two pallets are in process in Building 1625 Bay 3. A bomb is loaded by a one ton pneumatic hoist into the cutting lathe and indexed. A previously cut bomb is loaded by pneumatic hoist into a guillotine press and a middle section of a bomb is loaded into a vertical press. Workers exit the building and retreat to Building 1633. This building is a steel reinforced concrete earthen covered bomb proof remotely located control room at 350 feet away. Controls are activated and each machine cycles. The lathe cuts two grooves approximately 18 inches apart into a bomb cutting to a depth approximately 0.062 inches from the explosive and stops. The lathe is programmed with auto sensors to not exceed a programmed cutting depth. The guillotine press cuts the remaining thickness of metal on a previously cut bomb and pulls the nose and base apart from the center section. The vertical press pushes the bulk explosive from the center section of a bomb into a container.
3. Workers return to the process and remove the bomb from the cutting machine and index to the guillotine, remove the sections from the guillotine and index the center section to the vertical press. The nose section and the base section are loaded onto a pallet for transfer to Building 1619. Approximately 25 bombs are cut per shift. The nose section and the base section are loaded into a steam (5psi) cabinet and steam heats the outer base sections to release the explosive cast. The cast explosive separates from the metal case and drop into a container. The wax base plug and excess tar are removed from the cast explosive by hand with a non sparking putty knife and are disposed of.

# **GENERAL DYNAMICS**

## Ordnance and Tactical Systems

4. Accumulated salvaged cast explosive will be transferred to the second floor of building 1619 by elevator and manually loaded into a saturated steam (5psi) heated melt grid. Liquid explosive will be gravity fed to one of two 150 gal. Jacketed kettles heated with hot water, no agitation and subsequently gravity fed to a commercial flaking unit. Flaked TNT will be boxed and stored or shipped.

### **Explosive Siting Considerations:**

The combined explosive load limit for Buildings 1625 and 1619 is 19,000 lb of Class 1.1D. The interline distance from Building 1625 to 1619 is 450 ft barricaded. (see drawing 1699 QD). Explosive receiving in Building 1625 will be by truck and a maximum of 16 bombs will be received at one time. Building 1625 has two steel reinforced concrete blast walls separating the building into three bays. The blast walls are designed to TM 5-1300 standards.

### **Distance between the facility to be constructed or modified and other installation facilities; the installation boundaries; public traffic routes; power transmission and utility lines:**

There are no other facilities within inhabited building distance of this facility. There are no public traffic routes or public utilities within traffic route or utility distance of this facility. The nearest public utility a 2.5 inch buried gas line is located 1800 feet west of this facility. The nearest installation boundary is 3500 feet to the south of Area S (see drawing 5099 sheet 1 of 1).

### **Identification and brief description of the mission of all facilities within inhabited building distance of the facility to be constructed or modified.**

There are no facilities within inhabited building distance of this facility. The nearest inhabited building is Building 1607 and 1608 located 1450 ft. barricaded from the facilities to be used. Building 1607 and 1608 are leased to Center point Energy. Building 1607 is being used as a warehouse and administrative mobile offices are located adjacent to 1608.

### **Identification and brief description of the mission of other facilities whose inhabited building distance arcs include the facilities to be constructed or modified.**

The adjacent Area E is the nearest facility to the Explo System facility. Area E was destroyed by a fire in August 2006. Area E cannot be reutilized without major construction.

### **Anticipated personnel limits for the facility.**

a. Personnel limits for the proposed facility are 4 operators and 2 casual during operations for Building 1625. This is a remote operation and operators will be withdrawn to Building 1633 when machines are activated. Building 1633 is a hardened steel reinforced concrete bomb proof building

# **GENERAL DYNAMICS**

## Ordnance and Tactical Systems

b. 1619 personnel limits are 4 operators and 3 casuals.

**Explosive limits and hazard classification of ammunition, explosives, or other hazardous materials in facilities within inhabited building of the facility to be modified or constructed and facilities whose inhabited building distance arcs include the facilities to be modified.**

There are no facilities within inhabited building distance of this facility. There are no facilities whose explosive arcs overlap this facility.

**Construction details, types, arrangement, and test data pertaining to walls, roofs, shields barricades, window, exits, floors, explosives operating equipment, fire protection systems, lightning protection and static electricity grounding systems, electrical installation, ventilation systems, and equipment, hazardous waste disposal systems, auxiliary support structures, chemical agent monitoring, and general materials and construction.**

The buildings were constructed in 1953 and are post and beam construction on concrete floors, roofs are corrugated tin, and outer walls are wood frame covered with gypsum board. Windows are clear plastic composition or glass with wire mesh, exists are double door. Explosive operating machines are German design and are class rated for explosive operations. Electrical installation is class rated for explosive. Lightning protection is a mast system with 0 gage down connectors connected to a buried counterpoise. All equipment is bonded and grounded to the lightning protection system. Building 1633 is a hardened steel reinforced concrete earthen covered structure used as a control room for the operations conducted in building 1625 and is located 350 ft to the west (see drawing 1699 QD). Building 1625 has two steel reinforced concrete blast walls designed to TM 5-1300 standards for 5000 lb of explosive.

**Topographic map with appropriate contours when terrain features are considered to constitute, natural barricading.**

Terrain features are not a factor for this submission.

**Explanation and rational or justification for any deviations from the requirements, of regulations, standards or policy including information pertinent to approval or in process waivers and exemptions that affect the project.**

No known deviations.

**Test results and other substantiating documentation supporting in process hazard classifications.**

None

# **GENERAL DYNAMICS**

## Ordnance and Tactical Systems

**Test results and other substantiating documentation supporting conveyor spacing distances, operational shield designs and proposed protective construction if not in accordance with paragraph 5-6 of this regulation and TB 5-1300.**

None

**A hazard analysis of the facility has been performed in accordance with AMCR 385-3 and meets the criteria therein.**

Due to the nature of the operations it has been determined that the process be conducted by remote control. A hazard analysis has been completed by the manufacturer of the process equipment.

**A copy of the restricted or controlled air space request, submitted in accordance with AR 95-50, must be enclosed on all demolition and firing and test ranges where the maximum ordinate of fire will exceed 45 meters above ground level.**

Not required.

Note: This consideration of the plant operation is subject to change with process improvement.

# GENERAL DYNAMICS

## Ordnance and Tactical Systems

August 4, 2008  
WTK08-180

DCMA Munitions and Support Systems  
Florida Team DCMAG-MSMF  
9549 Koger Boulevard  
Gadsden Building, Suite 200  
St. Petersburg, Florida 33702-2455

Attention: Mrs. Diane Wheeler  
Administrative Contracting Officer

Subject: Site Plan Submission for Explo Systems Inc., Minden, LA

Reference: Contract W52P1J-05-C-0075 Demilitarization of Conventional Ammunition

Dear Mrs. Wheeler,

General Dynamics Ordnance and Tactical Systems (GD-OTS) is in the process of approving Explo Systems, Inc., Minden, LA as a second source for our Demilitarization Contract WP52P1J-05-C-0075 for the demilitarization of the 750 lb F114 Aircraft Bombs and removal of the bulk explosive material. GD-OTS respectfully asks to have the Explosive Site Safety Plan for the Explo Systems operation approved by the PCO.

Attached is a narrative describing the process of demilitarizing these 750 lb Bombs for the above referenced contract. Mr. Ralph Knape, Safety Specialist, U.S. Army, Rock Island and Mr. Doug White, DCMA Safety Manager have copies of the site plan and drawings. At their request we were asked to not send any more copies of the Explosive Site Safety Plan. Please forward to Mr. White the attached narrative for review and submission to Mr. Knape and the PCO for approval.

For any technical questions contact Mr. Worth Hall at 727-578-8270; e-mail: worth.hall@gd-ots.com and for any contractual questions or comments, please contact the undersigned.

Attachment: Consideration for Safety Site Plan for Explo Systems

Best Regards,



Bill Koepp  
Contracts Administrator  
727 578 8342  
e-mail wtkoepp@gd-ots.com.

11399 16<sup>th</sup> Court N., Suite 200  
St. Petersburg, FL 33716  
Tel: 727 578 8100  
Fax: 727 578 8726  
www.gd-ots.com