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SUPERFUND DIV.
DIRECTOR'S OFC.

EXPLO
SYSTEMS, INC.

June 24, 2013

Ms. Cynthia Brown
Removal Enforcement Coordinator
Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202

Re: Explo Systems, Inc.
CERCLA 104(e) Information Request, dated May 10, 2013
SSID No. A6GH

Dear Ms. Brown:

This letter provides the response of Explo Systems, Inc. to the CERCLA 104(e) Information Request, dated May 10, 2013. The responses are attached and made a part hereof.

Explo has made a good faith effort to fully and completely respond, even if it had general or specific objections to the request. If you find any response lacking or need additional information, please contact us immediately and Explo will work with you to provide the necessary information.

I trust this is sufficient for your needs at this time. If you have any questions, concerns, or comments, or need additional information, please contact me.

Sincerely,

Explo Systems, Inc.

By: _____
David Fincher, President

1099588.1

1600 Java Road, Minden, LA. 71055 Phone (318) 382-8700 Fax (318) 382-8434

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RESPONSE OF EXPLO SYSTEMS, INC. TO EPA, REGION 6'S CERCLA 104(e) INFORMATION REQUEST

Explo Systems, Inc. (Explo) received a CERCLA 104(e) Information Request, dated May 10, 2013 (Information Request), from the Environmental Protection Agency, Region 6, on or about May 13, 2013. The Information Request consisted of three 'enclosures,' one of which, Enclosure 3, contained twelve Questions requiring a response within thirty days of receipt. Several of the Questions required the production of documents.

By letter dated May 14, 2013, Explo requested an extension to respond to the Information Request. The extension requested was granted on May 15, 2013, requiring a response on or before June 28, 2013. Therefore, this response is timely.

Explo operates at Line S at Camp Minden. It began its operations at Line S after August, 2006. However, on May 20, 2013, the Louisiana State Police (LSP) physically seized Explo's licenses and its magazine keys. The keys were turned over to the Louisiana National Guard.

GENERAL RESPONSE AND OBJECTIONS

1. Camp Minden (also known as the Louisiana Army Ammunition Plant) has been in existence since World War II and has been extensively used by the United States government for the manufacturing and storage of munitions. As can be expected, its use by the United States has caused contamination in soil, sub-surface soil, and groundwater throughout Camp Minden. In fact, the Louisiana Army Ammunition Plant was a Superfund site.

Line S was heavily contaminated by the United States' operations. The contamination at Line S has been documented in at least two major studies, both of which were completed prior to the time Explo began its operations at Line S. See *Site Investigation Report for the Preliminary Groundwater Site Investigations at Eight Load/Assemble/Pack Lines and Three Test Areas*, Final Report, August, 1999 (SI Report). See also, *Follow-On Remedial Investigation for Soils and The Site-Wide Ground Water Operable Unit*, Vol. I, September, 2005 (RI Report).

Line S was constructed in 1944 and was in operation until May, 1996. SI Report, p. 2-17. During these years, RDX, Composition A-5, TNT, Composition B, and Propellant M-10 were used or present at Line S. *Id.*, p. 2-18. Between 1988 and August, 1999, over 3,500 gallons of red water was documented to have been spilled at Line S. *Id.*

The soil and subsurface soil at Line S are heavily contaminated, and were prior to 2006. Explosives, such as RDX and TNT, VOCs, SVCs, and metals, such as lead, were documented. RI Report, pp. 67 – 71. The groundwater is also heavily contaminated. Explosives and metals have been detected. RI Report, pp. 188 – 193.

2. Explo's main process operations at Line S occurred indoors, under roof, and over concrete. There have been no substantial releases of any materials, including any hazardous

substances, during Explo's operations at Line S. To the extent any releases or spills did occur, they were, at worst, *de minimis* and very minor.

Further, there is no current threat of release. No materials are stored outside. In fact, at the time the Information Request was sent (May 10, 2013), no materials were stored outside. All such materials were gone by January, 2013. Any past threat of a release (the existence of which is denied) has been removed. Further, Explo's analysis of the spilt samples taken in April, 2013 by EPA (only metals were analyzed by Explo) establishes that metal results see to be below the LDEQ's RECAP screening standards for industrial uses. See Exhibit A. It should be noted that the RI Report documents that lead was detected in all 46 surface soil samples and all 61 subsurface soil samples taken at Line S during prior investigations. RI Report, p. 70.

Additionally, due to the heavy contamination at Line S from the United States' activities, any possible contamination from an alleged recent release or spill (which is denied) cannot be distinguished from the previously existing contamination caused by the United States.

In particular, the area east of Building 1617 was extensively sampled in 1996 and 1999 and, consistent with Line S as a whole, extensive contamination was found. Explosives, SVOCs, and arsenic were found in surface soils. VOCs and arsenic were found in subsurface soils. RI Report, pp. 67 – 71 and Figures 3.12-2 - 3.12-8. Further, similar results were found in the area of Buildings 1612 and 1613. Finally, the area around Building 1619, which included the steam hoods and both melting processes, was also extensively sampled. Explosives, VOCs, SVOCs, and arsenic were found in surface and subsurface soils. RI Report, pp. 67 – 71 and Figures 3.12-2 - 3.12-8.

3. The Background Information section of the Information Request suggests that Explo has on-site Red or Pink Water, 700 pounds of 'plastic/tar/TNT waste' and 'Tritonal (and/or TNT mixture),' which is also described as the 'Tritonal/TNT mixture.' While these materials are described as 'hazardous materials,' there is also the insinuation that they are also 'waste.'

Explo does have some material (about 57 five-gallon buckets) which, to the best of Explo's information and belief, is not red or pink water. The material was never discarded as it was always processed into explosive material by being added to other TNT-based materials in Bay 5 of Building 1619. Explo has always regarded this material a Wetted TNT, with a shipping classification of UN0209. The 57 buckets are all that is left.

By definition, Tritonal is typically 80% TNT and 20% aluminum. Tritonal was removed from M-117 bombs between 2007 and 2011. Tritonal was sold as a product, as is, or was further processed in Building 1619 into its component parts (TNT and aluminum). The TNT and aluminum were sold as separate products. Around 2009, Explo began the "Crusher Unit" Building 1617 to reduce the size of some of the aluminum into small pieces. In turn, the processed aluminum was sold as a product. At no time was TNT added to Tritonal or is there a 'Tritonal/TNT mixture.' There is some TNT in the aluminum and the material is sometimes referenced as 'aluminized TNT.' However, it is not, and never has been, a waste. It is a valuable commodity, was always treated as such, and has been sold either as produced from the Building 1619 melt process or the Building 1617 crusher process.

The 'asphalt/wax/TNT' mixture is a non-hazardous solid waste. It was generated by the use of steam during the processing of the M-117 and M-84 bombs. The inside of the bombs contain asphalt and paraffin wax. After the explosives are removed, the bomb pieces are steamed to soften the asphalt and wax, which is scrapped off so that the bomb pieces may be certified as 3X scrap. This means that there is no visible sign of explosives.

The asphalt/wax mixture has been characterized by Explo. See 40 CFR 262.11. Due to the method of its generation, it is not listed. The only potentially applicable characteristic is reactivity. However, Explo and its consultant, C-K Associates, Inc., reviewed each of the reactivity criteria and concluded that the material did not display that characteristic. See Exhibit B. As a result, the material has been disposed of in the Webster Parish Landfill, an industrial solid waste landfill which, to the best of Expo's knowledge, information, and belief, meets the requirements as a Subtitle D landfill.

4. Explo may not have all of the documents or records that are responsive to the Information Request requiring the production of documents. Prior to August, 2006, Explo operated at Line E. However, due to a fire that consumed the entirety of Line E, all records and documents were lost. Thus, there are no documents from 2001 to 2006. Additionally, the Louisiana State Police and the Department of Defense seized computers and documents at Line S in 2012 and/or 2013. A list of such documents is attached as Exhibit C. Explo does not have possession of these documents.

SPECIFIC RESPONSE AND OBJECTIONS

Subject to the General Response and Objections noted above, Explo provides the following responses to the twelve questions in Enclosure 3 to the Information Request:

1. Please provide a customer list including company names, addresses and contact person of anyone you have done business with since the company began in 2001.

Response:

Objection. This request is overbroad and beyond the authority and/or scope of CERCLA §104(e). Explo's customers (that is, persons to whom materials were shipped) are not 'covered persons' or 'potentially responsible parties' pursuant to CERCLA §107(a) as they have no relationship to any facility owned or operated by Explo at which 'disposal' may have taken place. There are no records prior to August 2006.

Subject to the objection, the following is a list of most of Explo's customers:
The United States Department of Defense
    Address
    Contact person
General Dynamics
Accurate
Dyno-Nobel
Alliant/ATK

CCI Speer
Green Tree
Universal Tech Group
ISL
Spurlock
Austin Sales
Austin Powder
Boren Explosives
Brakefield Equipment
Phoenix Mining
Kentucky Powder
Jack's Powder Keg
JB Ag.
Bailey Bark
Recycling Services
Republic Industries
Orica
See also later responses for additional customers that may have inadvertently been left off this list.

2. What did your customers ship to Explo Systems, Inc.? Provide documentation for type of materials, material identification (i.e. product names), manifests, volumes, dates of transport and origination of shipments.

Response:

Objection: The records relating to incoming shipments are voluminous, all of which are not in Explo's possession. Responsive information is being provided in a 'thumb drive.'

Subject to the objection, the following is a list of incoming materials:
155 mm howitzer shells: The United States Department of Defense
M-117 bombs (750 pounds): The United States Department of Defense
M-84 bombs (2,000 pounds): The United States Department of Defense
H-6: Accurate
Composition B: Dyno-Nobel
HLX 107: General Dynamics
LX14 (HMX): General Dynamics
PBX-9: General Dynamics
Smokeless powder: Alliant, CCI Speer
Nitro-cellulose: Green Tree
Ammonium picrate: Universal Tech Group
Tritonal: ISL
Torpex: ISL
Hexatonal: ISL
A5: Explosia
CBU: General Atomics

3. What was the specific procedure for processing the materials received from your customers once Explo Systems Inc. accepted the shipments?

Response:

Explo's Standard Operating Procedures, Nos. 1 – 66, are attached in two discs. The movement of material on-site is tracked using documents which Explo has named 'Travelers.' These records are voluminous. EPA already has in its possession a representative sample of these documents.

If EPA needs additional detail on these processes after reviewing these responses, Explo can provide additional detail. Generally, however, the procedure for each incoming material is set forth below:

155 mm howitzer shells: The United States Department of Defense

contained M6

The deliverable to Explo was the propellant charge that was used in 155 mm howitzer shells. The actual shells were not received at Explo.

Incoming shipping canisters containing the propellant charges were placed into magazines, then moved, when needed, to Building 1607 for preparation, which consisted mainly of opening the shipping canisters containing the propellant bags. The canisters were moved to Building 1608, where the propellant charge was removed from the canister. The propellant charge is a rayon/cotton bag containing various components, which were separated by hand.

The disposition of the components was as follows:

Propellant Charge Components	Disposition
Shipping canister (PA37A)	Crushed, then to special dumpster, for recycling as scrap metal
M6 Propellant	Removed to bunker for later sale
Black Powder (small bag)	Removed to bunker for later sale
CBI/Igniter (small bag)	Removed to bunker for later sale
Potassium sulfate (small bag)	To optical sorter in Building 1607: The potassium sulfate was placed into bulk sacks for sale. The small bag also contained a lead lining and was handled similarly to the leaded portion of the rayon bag.
½ rayon bag (No lead)*	Into dumpster for disposal at Webster Landfill
½ rayon bag (With lead)*	Buildings 1607 and 1610 for re-sale/lead reclamation. Later, the bags were placed in Buildings 1608 and 1601.
Miscellaneous: -Wood pallet/spacers -Cardboard -Metal strips -Misc. scrap metal	 -On flat bed, recycled -Bailed, recycled -Special dumpster, recycled as scrap metal -Special dumpster, recycled as scrap metal

*The rayon bags which contained the full propellant charge contained a thin paper-like lead sheet that covered one half of the bag. The bag was cut into two pieces. The half

without the lead was sent to a dumpster for disposal. The half with the lead was to be recycled.

M-117 bombs (750 pounds): The United States Department of Defense

Contained Tritinal

These bombs were received as such under two separate contracts: Alliant from 2007 - 2008 and General Dynamic from 2009 - 2011.

Alliant - 2007 – 2008:

Incoming shipments were placed into magazines, then moved, when needed, to Building 1629 for receiving and then to Building 1624 for preparation. The preparation primarily consisted of removing the 'butt-plate' cover and the nose plug. The bomb was then moved to Building 1625 where a lathe was used to cut two grooves around the bomb. A press then opened the bomb. The Trintonal was removed from the center portion of the bomb. The Tritonal, along with the bomb pieces, was moved to Building 1619.

The bomb pieces were placed into steam hoods to soften the asphalt/wax that coated the inside of the bomb. The asphalt/was scrapped off by hand and placed into boxes for disposal. Condensate would be created in a drum under the steam hoods. Generally, the water would evaporate or be evaporated using a steam coil.

Tritinal

The Tritonal was sent to the upstairs of Building 1619 and melted into TNT and aluminum. The TNT was returned to DOD. The aluminum was placed in bunkers.

The disposition of the components was as follows:

Bomb Components	Disposition
Tail/center/fin pieces	Special dumpster, recycle as scrap metal
Butt plate guard	Special dumpster, recycle as scrap metal
Nose plate (plastic)	Dumpster
Tritonal	To Building 1619 Upstairs Melt
Asphalt/wax	See above description
Steam condensate in drum	Steam coil evaporation; residue back to process
Miscellaneous	As above

General Dynamics – 2009 – 2011:

The process was the same as described above, with two notable differences. As to the condensate created during the steam process, it was placed into a carbon filter drum. The water was re-used in the process. The carbon filter is still at Line S and may still be used. As to the Tritonal, some of the Tritonal was sold as is.

For both contracts, aluminum from the Tritonal was produced from the Building 1619 melt process. Some of the aluminum, which was in the form of bricks, was sold as is. However, some customers sought a smaller sized product. Explo installed a 'crusher unit' in Building 1617 which reduced the size of the aluminum to thumb-sized pieces.

M-84 bombs (2000 pounds): The United States Department of Defense
Contained H-6

The process for these bombs was similar to the M-117.

Incoming shipments were placed into magazines, then moved, when needed, to Building 1629 for receiving and then to Building 1624 for preparation. A measuring device was used on these bombs to determine the shell thickness. The bombs contained H-6, which could not be processed in the Building 1619 upstairs melt. Explo installed a melt process in Bay 5 of Building 1619. The H-6 was solid as is or melted and sold.

The disposition of the components was as follows:

Bomb Components	Disposition
Tail/centers (2)/fin pieces	Same as M-117
Butt plate guard	Same as M-117
Nose plate (plastic)	Same as M-117
H6	Sold as lump, or 1619 Bay 5 melter
Asphalt/wax	Same as M-117
Steam condensate in drum	Same as M-117 (steam coils only)
Miscellaneous	As above

H-6: Accurate
H-6 from Accurate Energetics was received and melted in the Bay 5 melter in Building 1619. After processing, it was sent back to Accurate.

Composition B: Dyno-Nobel
Composition B from Dyno-Nobel was received and melted in the Bay 5 melter in Building 1619. After processing, it was sent back to Dyno-Nobel.

HLX 107, LX14 (HMX)
Smokeless powder: Alliant, CCI Speer
Torpex: ISL
These materials were received, stored in magazines, and sold. No processing occurred.

PBX-9: General Dynamics
PBX- 9 was a total of 130 pounds (one drum). The material was blended with Torpex through Bay 5 and was sold to Austin Powder Company.

Nitro-cellulose: Green Tree
This material was received and stored in magazines. No processing occurred. Years ago, some of the material was burned pursuant to LDEQ approval.

Ammonium picrate: Universal Tech Group
A small amount of this material (135 pounds) was purchased from Universal Tech Group as a product to mix with water for testing in the Super-Critical Water Unit. The test was sanctioned by LDEQ.

Tritonal: ISL – This material was processed if necessary or sold sold to Dyno-Nobel, Austin, and/or Orica.
Hexatonal: ISL – Sold to Dyno-Nobel, Austin, and/or Orica.
A5: Explosia: – Sold to Dyno-Nobel, Austin, and/or Orica.

Cluster Bomb Unit (CBU): General Atomics
The CBU was separated into its 92 sub-units and each sub-unit was placed into nitrogen to freeze. Then, the sub-units were placed into a press to pulverize the unit. We then took the units and burned the entire unit to include the canister, detonators, and explosive material (Cyclotol).

4. What was the final disposition of the materials once they were accepted by Explo Systems, Inc.?

Response:

See additional information, above.

	Disposition	Customer
Propellant Charge Components		
Shipping canister (PA37A)	Crushed, then to special dumpster, for recycling as scrap metal	Spurlock
M6 Propellant	Removed daily to bunker for later sale	Austin Sales Austin Powder Boren Explosives Brakefield Equipment Phoenix Mining Kentucky Powder
Black Powder (small bag)	Removed daily to bunker for later sale	Jack's Powder Keg
CBI/Igniter (small bag)	Removed daily to bunker for later sale	Jack's Powder Keg
Potassium sulfate (small bag)	To optical sorter in Building 1607: The potassium sulfate was placed into bulk sacks for sale.	JB Ag/International Ag
½ rayon bag (No lead)	Into dumpster for disposal at Webster Landfill	Webster Parish Landfill
½ rayon bag (With lead)	Buildings 1607 and 1610 for re-sale/lead reclamation. Later, the bags were placed in Buildings 1608 and 1601.	Buildings 1608 and 1601
Miscellaneous: -Wood pallet/spacers -Cardboard -Metal strips -Misc. scrap metal	 -On flat bed, recycled -Bailed, recycled -Special dumpster, recycled as scrap metal -Special dumpster, recycled as scrap metal	 -Bailey Bark -Recycling Services -Spurlock -Spurlock
M-117 Components		
Tail/center/fin pieces	Special dumpster, recycle as scrap metal	Spurlock
Butt plate guard	Special dumpster, recycle as scrap metal	Spurlock
Nose plate (plastic)	Dumpster	Webster Parish Landfill
Tritonal	To Building 1619 Upstairs Melt	TNT – DOD, Orica, Dyno-

		Nobel Aluminum – Orica, Dyno-Nobel Metal – Spurlock
Asphalt/wax		Webster Parish Landfill
Steam condensate in drum	Steam coil evaporation; residue back to process	Residue back to process Carbon filter remains
Miscellaneous	As above	
M-84 Components		
Tail/centers (2)/fin pieces	Same as M-117	As above
Butt plate guard	Same as M-117	As above
Nose plate (plastic)	Same as M-117	As above
H6	Sold as lump, or 1619 Bay 5 melter	Austin Accurate
Asphalt/wax	Same as M-117	As above
Steam condensate in drum	Same as M-117 (steam coils only)	As above
Miscellaneous	As above	As above

H-6 (from Accurate): See above.
Composition B: See above.
HLX 107: Sold to Explosive Services International
LX14 (HMX): Sold to Explosive Services International
PBX-9: Sold to Austin Powder
Tritonal (from ISL): Sold to Dyno-Nobel, Austin, and/or Orica.
Hexatonal (from ISL): Sold to Dyno-Nobel, Austin, and/or Orica.
A5: Sold to Dyno-Nobel, Austin, and/or Orica.
Smokeless powder: Sold to Kentucky Powder, Austin Powder
Torpex: Sold to Dyno-Nobel
Nitro-cellulose: This material is in magazines at Camp Minden.
Ammonium picrate: The ammonium picrate should have been destroyed during the test. Clean(er) water is being held in tanks at Line S.

5. Please provide copies of all contracts or sub-contracts you have with your customers, including the contracts or other agreements with the Department of Defense and General Dynamics that included activities pertaining to materials including but not limited to ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal/TNT mixtures and M6 Propellant.

Response:

See Exhibit D.

6. Provide an explanation as to the source of the materials including but not limited to ammonium picrate, M30 propellant, other propellants, potassium nitrate, nitrocellulose, Tritonal/TNT mixtures, such as type of munitions or equipment that contained the materials.

Response: