Message

From: Kuziomko, Joseph [kuziomko.joseph@epa.gov]
Sent: 8/1/2017 5:14:10 PM
To: Pena-Molina, Ana [pena-molina.ana@epa.gov]; Shuster, Kenneth [Shuster.Kenneth@epa.gov]
Subject: FW: ORCR Project Regarding OB/OD Sites

Best,
Joseph Kuziomko
Intern, US EPA Office of Resource Conservation and Recovery (ORCR)
Potomac Yard South
(703)-347-8168

From: Robert Thomas [mailto:Robert.Thomas@LA.GOV]
Sent: Tuesday, August 1, 2017 10:09 AM
To: Kuziomko, Joseph <kuziomko.joseph@epa.gov>
Cc: estuardo.silva@la.gov; Jodie Kimball <Jodie.Kimball@la.gov>
Subject: FW: ORCR Project Regarding OB/OD Sites

Mr. Kuziomko,

Please find a response to your request below.

Thank you,

Robert Thomas
Louisiana Department of Environmental Quality
225-219-3604

From: Kuziomko, Joseph [mailto:kuziomko.joseph@epa.gov]
Sent: Monday, July 17, 2017 10:46 AM
To: Donelson Caffery; Will Steele; Mia Townsel; Lina Saale
Cc: Shuster, Kenneth; Pena-Molina, Ana; Kohler, Amanda
Subject: ORCR Project Regarding OB/OD Sites

I am writing to seek information on the closure status of the Open Burn/Open Detonation (OB/OD) units listed below to assist ORCR in a new project to assess closure of OB/OD units. With this information, EPA will be able to identify, evaluate, and document procedures, techniques, and criteria to assess, clean up, and close OB/OD units/sites in a standardized manner.

EPA has been documenting soil and ground water contamination from OB/OD units and the costs to clean them up. Given the inordinate extent of contamination and costs of clean-up that have been reported, we are now seeking to learn more about the monitoring, clean-up procedures, successes, and costs of these efforts. There is currently no

national guidance on procedures to assess, monitor, and clean up OB/OD sites, nor metrics to achieve clean closure of OB/OD units. We are requesting information on the clean closure (CC) of OB/OD sites to assist us.

Please first verify the following codes for your facilities in Louisiana.

Louisiana							
FACILITY_ID	FACILITY_NAME	UNIT_NAME	UNITs	UNIT_DETAIL_SEQ	legal status	operating status	EFFECTIVE_DATE
LA9571924050	BARKSDALE AIR FORCE BASE	OB/OD	3	3	PI	CC	19990621
LAD981055791	CLEAN HARBORS COLFAX	OLD BURN PAD	2	4	PI	CC	19970818
LAD981055791	CLEAN HARBORS COLFAX	OLD BURNPAD/TROUGH *(20 magazines)*	7	2	PI	CC	19970818
LA0213820533	LA ARMY AMMUNITION PLANT	OPEN BURNING	7	2	IT	SF	19960930

Questions:
We have a number of questions we hope you can answer regarding your clean closed/closing sites. The operating status of the facilities will determine which sets of questions are to be answered. We understand that some of this data may be difficult to find but we would really appreciate if you could dig it up for us as it will help us move forward with this project and eventually help EPA update OB/OD closing procedures.

Clean Closed (CC) Facilities' questions: (Clean Harbor's Colfax OB/OD)

1. Did these sites complete clean closure or are they still in the process of seeking to clean close? Yes, Clean closure

2. Did the state officially certify/approve the unit(s) Clean Closed (CC)? Yes

3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation? Based on a review of the file, the Old Burn Pad / Trough unit(s) disposed of approximately 3000 lbs/ day & 1.182 tons / year and operated from 1988 – 1995 (7 years).

4. Was it OB or OD or both? Both OB & OD

5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring). Information exists in our Electronic Data Management System (EDMS).

6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)? Information exists in our Electronic Data Management System (EDMS).

   See;

   Old Burn Unit Closure Plan and RFI submitted 7/1/1994 http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=673394&ob=yes&child=yes EDMS Doc no 673394
   Old Burn Unit Closure Activities and soil sampling http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=673511&ob=yes&child=yes EDMS Doc No. 673511

7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?)? Information exists in our Electronic Data Management System (EDMS).

See;

Old Burn Unit Closure Plan and RFI submitted
7/1/1994 http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=673394&ob=yes&child=yes EDMS Doc no 673394

A Revised Work plan for Risk based Corrective Action Evaluation for the old Burn Area was submitted on 9/3/1997
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=673462&ob=yes&child=yes EDMS doc No 673462

Old burn Area groundwater samples taken
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=8365402&ob=yes&child=yes

8. What data was recorded and metrics used to evaluate the extent and levels of contamination?)? Information exists in our Electronic Data Management System (EDMS). See;

Old Burn Unit Closure Plan and RFI submitted
7/1/1994 http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=673394&ob=yes&child=yes EDMS Doc no 673394

A Revised Work plan for Risk based Corrective Action Evaluation for the old Burn Area was submitted on 9/3/1997
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Old burn Area groundwater samples taken
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=8365402&ob=yes&child=yes

9. What criteria was used to certify clean closure (e.g., EPA action levels)?)? Information exists in our Electronic Data Management System (EDMS).

Remedial standards were developed using Risk Evaluation/Corrective Action Program (RECAP) Screening Option Standards. No constituent concentrations exceeded the applicable screening standards. Soil, sediment and groundwater sampling has confirmed that the constituents of concern concentrations do not exceed the established site specific remediation standards so no remedial action was required. http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=8927041&ob=yes&child=yes

Please see the following documents in EDMS for reference:
EDMS Document 673394 July 1994 Closure Plan
EDMS Document 673493 May 1995 Closure Plan for old Thermal Treatment unit Revised
EDMS Document 837315 July 20, 1995 Approval of Contingent RFI Work Plan for the old burn units
EDMS Document 7395398 Closure Permit for Old Burn units effective Nov. 15, 1995
EDMS Document 673511 Oct. 11, 1996 Report of Closure Activities
EDMS Document 842185 Sept 3, 1997 Closure Certification
EDMS Document 5067098 Sept 10, 1997 Approval of the Report of Closure Activities
EDMS Document 5902583 Operating Renewal Permit Oct. 26, 2007
EDMS Document 8366793 Jan. 6, 2012 RECAP Work Plan Approval with Stipulations
EDMS Document 8363558 April 27, 2012 Old Burn Area Confirmatory GW Sampling Work Plan
EDMS Document 8757082 June 13, 2012 Old Burn Area Confirmatory GW Sampling Work Plan
EDMS Document 8643639 Dec. 14, 2012 RECAP Screening Option Report for Old Burn Area
EDMS Document 8754514 March 5, 2013 Conveyance Notice

10. What was the total cost to achieve Clean Closed (CC) status? Estimated cost of closure in 1995 was $78,804 revised to $80,459. The amount of Financial Assurance for the site for closure and post-closure was $308,083.00 in 1995 Schedule A for the Trust Agreement. See EDMS link;

http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9450802&ob=yes&child=yes

Clean Closed (CC) Facilities' questions: Barksdale AFB

1. Did these sites complete clean closure or are they still in the process of seeking to clean close? All waste was removed and no further action required but the facility would like to use the area as a military training exercise under the Military Munitions Rule.

2. Did the state officially certify/approve the unit(s) Clean Closed (CC)? All waste was removed and no further action required, but the facility would like to use the area as a military training exercise under the Military Munitions Rule. See Verification of Closure http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=874798&ob=yes&child=yes No Further Action required at the OB/OD in 1999 http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=874800&ob=yes&child=yes

3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation? 350 pounds of net explosives per year under multiple Emergency Permits. According to our records the unit began operations in the 1950s http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=872773&ob=yes&child=yes and operated until Closure in 1998.

4. Was it OB or OD or both? Both OB & OD

5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring) Remedial activities, groundwater testing, decontamination procedures, soil sampling, borings, temporary groundwater monitoring wells were used / utilized. All information can be found in the LDEQ EDMS (see revised closure plan and multiple Addendums to the Closure, RFI, Groundwater monitoring, boring logs and certification of closure activities document)

   Revised Closure Plan
   http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696094&ob=yes&child=yes

   RFI http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696094&ob=yes&child=yes

   Groundwater Monitoring http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=697745&ob=yes&child=yes

   Certification of Closure Activities Document; http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696321&ob=yes&child=yes

6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)? Yes, Information exists in our Electronic Data Management System (EDMS). See Certification of Closure Activities Document; http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696321&ob=yes&child=yes

7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)? Information exists in our Electronic Data Management System (EDMS). See Certification of Closure Activities Document; http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696321&ob=yes&child=yes

   Revised Closure Plan http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696094&ob=yes&child=yes

   RFI http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696094&ob=yes&child=yes

   Groundwater Monitoring http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=697745&ob=yes&child=yes

8. What data was recorded and metrics used to evaluate the extent and levels of contamination? Information exists in our Electronic Data Management System (EDMS). See Certification of Closure Activities Document; http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696321&ob=yes&child=yes Revised Closure Plan http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696094&ob=yes&child=yes RFI http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696094&ob=yes&child=yes Groundwater Monitoring http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=697745&ob=yes&child=yes

9. What criteria was used to certify clean closure (e.g., EPA action levels)? Information exists in our Electronic Data Management System (EDMS). See Certification of Closure Activities Document; http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=696321&ob=yes&child=yes Verification of Closure http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=874798&ob=yes&child=yes

   No Further Action required at the OB/OD in 1999 http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=874800&ob=yes&child=yes

10. **What was the total cost to achieve Clean Closed (CC) status? This was a Federal Facility and not required to provide Financial Assurance, total cost was not recorded.**

Inactive/Closing, but Not Yet RCRA Closed (IN) and Corrective Action and Superfund (CA, SF) Facilities' questions: LA ARMY AMMUNITION PLANT

1. Are these units seeking to clean close? No, clean closure could not be achieved. Long term monitoring is required; See http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6610101&ob=yes&child=yes

2. If so, what criteria is being used to attempt clean closure (e.g., EPA action levels)? NA

3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation? OB was operated during WWII (1941) until 1983 and the OD operated from the 1940's until 1994 (approx. 43 years of operations at the OB and OD). Our records do not contain the amount of waste disposed and the frequency of burn was noted to be weekly for this time period. See pages 3-4 through 3-8 for a description of the units, use, size, operations and waste disposed; http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=8172240&ob=yes&child=yes and http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6610101&ob=yes&child=yes and http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6125142&ob=yes&child=yes

4. Was it OB or OD or both? OB and separate OD area

5. What sampling procedures are being used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)? Visual and magnetometer surface sweeps and digital geophysical mapping were used to identify buried mutations and munition debris; Extensive remedial Investigations, risk assessments, ecological risk assessments, Public Health assessments and 5 year Reviews of the Area with continued monitoring of the groundwater was conducted and/or continues. All documents can be reviewed via EDMS. See Fact sheet for LAAP at http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6119961&ob=yes&child=yes and http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6119982&ob=yes&child=yes; and Final Type II Work Plan for Munition Sites http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6125142&ob=yes&child=yes ; all of this Information exists in our Electronic Data Management System (EDMS).

6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)? The incinerator and burn units removed but the pad was left onsite.

7. What clean-up procedures and techniques are being used to clean up the contaminants (e.g., excavation, soil sifting)? Remedial Investigation, Risk Assessment in 1992, Continued GW monitoring, Health Risk Assessment and Ecological Risk Assessment in 1998, and the incineration of contaminated soils were conducted at the site. For a list of the documents and dates, as well as more Information on procedures, techniques and contamination, see our Electronic Data Management System (EDMS); See Fact sheet for LAAP at http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6119961&ob=yes&child=yes and http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6119982&ob=yes&child=yes and Final Type II Work Plan for Munition Sites http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6125142&ob=yes&child=yes

8. What data is being recorded and metrics being used to evaluate the extent and levels of contamination? Continuous groundwater monitoring and reporting Information exists in our Electronic Data Management System (EDMS). Previous remedial action plans, risk assessments, ecological risk assessments, and Public Health assessments can be found in our Electronic Data Management System (EDMS). See Fact Sheet for LAAP at http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6119961&ob=yes&child=yes and http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=6119982&ob=yes&child=yes for a list of these documents.

9. What is the total cost to date to remediate the site? It is a Federal site which is not required to provide financial assurance and is a Superfund site with continued GW monitoring. Therefore, we do not have a total cost for the remediation of the site.

We plan to have a contractor gather this information on a select number of sites from the states. The purpose of this current effort is to gather information on the status of cleanup at these sites to help us identify which sites have the best information for our contractor to follow up with. Thus, for this effort, we seek answers to questions 1-4 and the last question in each set, and for the remaining questions we seek whether or not good information exists to answer these questions. We hope to receive this information by **July 31st**. Thank you for taking time to assist us with this project. If you have any questions, please feel free to reach out to us. Any information that you may be able to provide will be helpful in our project.

Sincerely,
Joseph Kuziomko
703-347-8168

U.S. EPA Headquarters
Two Potomac Yard

2777S. Crystal Drive
Arlington, VA 22202-3553