



2007 Global Demilitarization Symposium & Exhibition

RCRA Subpart X OB/OD Facilities Permitting Initiative

Wednesday, May 16, 2007

Randall J. Cramer, PhD
Ordnance Environmental Support Office
Naval Ordnance Safety and Security
Activity
Indian Head, MD



Storyline

- Government Performance and Results Act
- RCRA Subpart X Baseline Universe
- JOCG OB/OD Optimization Study
- Joint DoD/EPA OB/OD Initiative
- The Prestige
- Next Steps



Government Performance and Results Act

- 1993 Government Performance and Results Act (GPRA) holds federal agencies accountable for achieving program results.
 - develop strategic plans
 - set long term goals and objectives
 - quantitatively measure how well they are doing
 - consult with affected parties
 - provide annual reports
 - annually communicate performance back to Congress



EPA GPRA Goals

EPA has set specific goals for hazardous waste management facilities.

- **By the end of 2008**, prevent releases from RCRA hazardous waste management facilities by increasing the number of facilities with permits or other approved controls... **to 95 percent.**
- **By 2011**, prevent releases from RCRA hazardous waste management facilities by increasing the number of facilities with permits or other approved controls... **to 98 percent.**



EPA GPRA Goals

Subpart X are the bulk of remaining GPRA operating facilities with the need of “having approved controls in place.”

- 40 CFR Part 264, Subpart X: Miscellaneous Units
 - thermal treatment units other than incinerators, boilers, or industrial furnaces
 - open burning / open detonation (OB/OD)
 - detonation chamber
 - chemical, physical, biological treatment units
 - “catch all” for innovative technologies and units

Jeff Gaines, RCRA Permits Branch
January 16, 2002
gaines.jeff@epa.gov



EPA GPRA Goals

What does “having approved controls in place” mean?

- Approved controls in place:
 - operating under final approved permit
 - closed with approved post-closure plan
 - unit is being handled by a cleanup program
 - unit has achieved clean closure
 - unit has no waste threat
 - case-by-case verification (for non-operating facilities)

<http://www.epa.gov/epaoswer/hazwaste/permit/gprabkgr.htm>



EPA GPRA Goals

- A draft list of 'Federal Facilities with Permitting Obligations' had 185 units: 28 units not under control.
 - List includes operating permit baseline plus post-closure permit baseline.
 - EPA wants to update and validate list.
 - Baseline Universe will be used to measure GPRA performance.

If EPA GPRA goal is taken for face value, all but ten of the these units must have approved controls in place by the end of next year.



JOCG OB/OD Optimization Study

Mission	Total DoD Units	Number with Interim Status
Demilitarization	12	8
Manufacturing	6	6
RDT&E	16	11
Self-generating	21	14
Total	55	39

Report to Joint Ordnance Commanders Group: "Optimization of Department of Defense Open Burning/Open Detonation Units," Munitions Demilitarization/Disposal Subgroup And Environmental Subgroup March 2000



Questions

- How are these RCRA hazardous waste facilities tracked?
- What is EPA using for their GPRA accounting?
- What is EPA's national approach to a final permitting strategy for "having approved controls in place"?
- What is EPA's national approach to performance standards and permitting guidelines?
- How can we ensure that we (DoD and EPA) are working from the same list?



Operational and Environmental Executive Steering Committee for Munitions



Munitions Action Plan (November 2001)

Maintaining Readiness through Environmental Stewardship and Enhancement of Explosives Safety in the Life Cycle Management of Munitions





OEESCM Stockpile Management Subcommittee

Mission

Manage the conventional ammunition stockpile to support operational requirements while enhancing explosives safety and reducing the potential for adverse effects to the environment.

- OEESCM Stockpile Management Subcommittee Issues
 - storage, transportation, demilitarization of excess and obsolete munitions
 - resource recovery and recycling of munitions
 - treatment and disposal of waste munitions

Note: The Demilitarization Subcommittee now integrated with the Stockpile Management Subcommittee



OEESCM Stockpile Management Subcommittee Members

- **OSD**
 - Vic Wieszek, OSD-ATL

- **Army**
 - Tony Livingston, JMC
 - Tim Alexander, AEC
 - J.C. King, DASA
 - Aaron Williams, DAC
 - Ty Nordquist, DAC

- **Air Force**
 - Dave Kumar, HQAF
 - Jorge Sanchez, AFCEE

- **Navy**
 - Randy Cramer, NOSSA
 - Deb Morefield, ASN

- **Marine Corps**
 - Jennifer Simmons, USMC



EPA Subpart X Workgroup

Toshia King, Office of Solid Waste	703/308-7033
Stacy Braye, Region 9	415/972-3345
Tab Tesnau, Office of Solid Waste	703/605-0636
Vern Myers, Office of Solid Waste	703/308-8660
Michael Galbraith, Office of Solid Waste	703/605-0567
Michael Kaufman, Office of Solid Waste	703/308-0436
Eric Reynolds, Site Remediation and Technology Innovation	703/603-9928



Joint DoD/EPA OB/OD Initiative

Short Term

- Joint DoD/EPA meeting held at Crystal City EPA Headquarters March 14, 2007.
- We agreed to consolidate our respective lists for use as the Baseline Universe and GPRAs performance metric.
- DoD will update and refine list of OB/OD facilities.
- We agreed to identify barriers to permitting or for having controls in place (DoD internally—EPA with states).

Longer Term

- Get accurate accounting of the RCRA status of DoD facilities.
- Determine obstacles to permitting and work with EPA on National guidance.
- Evaluate assets and establish permitting/closure priorities.



Joint DoD/EPA OB/OD Initiative

Need to speak the same language.

Service	EPA ID Code	Sequence # (RCRIS Number)	Permit Status (Legal Status)	Operating Status Code	Process Code
---------	-------------	------------------------------	------------------------------------	--------------------------	--------------

- **EPA ID Code:** issued by the Federal or State RCRA regulatory authority to facilities conducting hazardous waste activities.
- **Sequence Number:** used to track each unit or unit group (assigned in the RCRIS database. Taken from Part A permit application).
- **Permit Status (Legal Status):** describes the legal status of the unit or unit group (permitted (PI); interim status (IS); etc.).
- **Operating Status:** describes the unit in its operating lifecycle (operating (OP); clean closed (CC); etc.).
- **Process (or process code):** specifies unit type (disposal type (XO1 = OB/OD; X99 Other Subpart X).



The Prestige

- Spreadsheet Results as of April:
 - 52 units Operational Status Code (OP)
 - 20 units Legal Status Code Permitted (PI)
 - 30 units Legal Status Code Interim Status (IS)
 - 2 units Legal Status Code Interim Status Terminated (IT)
- Not all the Operational Units are OB/OD (molten salt, det chamber, other treatment)

Again, if EPA GPRA goal is taken for face value, all but three of the these units must have approved controls in place by the end of next year.



Achieving GPRA Goals

- Mechanisms
 - Issue Permits
 - Close Facilities
- Issues and Impacts to DoD
 - Environmental Requirements
 - Permits: Spent millions \$\$\$ on applications
 - Awaiting review
 - Unlike other RCRA permits (Use performance standards)
 - Closure:
 - Triggers stringent regulatory deadlines
 - Most closure plans are inadequate
 - Financial requirements not certain/not budgeted



Next Steps

- Complete the OB/OD spreadsheet and provide EPA a final list by June 1, 2007. Spreadsheet now includes codes that EPA can directly reference.
- Work with EPA in consolidating lists to establish a good GPRA Baseline Universe.
- Identify significant installation specific issues and permitting barriers.
- Meet again with EPA in Crystal City June 27, 2007



NDIA Contact Information

Randall J. Cramer, PhD
Ordnance Environmental Support Office
Navy Safety and Security Activity
4234 Steves Way, Suite 121
Indian Head, MD 20640-5058
phone: (301) 744-5641
fax: (301) 744-6749
cell: (703) 568-0560