



UPDATE ON OB/OD GUIDANCE DEVELOPMENT

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PRESENTATION

- Where We Are in the Process
- Protocol/POCs
- Update on the EPA/DoD Meeting in Washington DC
- New sampling method

WHERE WE ARE IN THE PROCESS

- Currently we are in the process of collecting more comments on the checklist
- Special points of contact for coordinating comments both from DoD and regulatory agencies were defined.



PROTOCOL AND POINTS OF CONTACT



- Comments received before are not adequate as the commenters were not the right people to coordinate the review.
- People attending Washington DC meeting are the right group (core group).
- DoD/EPA agreed to identify significant issues for discussion at the next core group meeting, June 27, 2007.

PROTOCOL AND POINTS OF CONTACT

- We all agreed to meet at the NDIA Demilitarization Conference, May 14 through 17, 2007 in Reno NV
- In separate agency breakout meetings.
- To compile significant issues



PROTOCOL AND POINTS OF CONTACT

- DoD point of contact is:

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

e-mail: randall.cramer@navy.mil

PROTOCOL AND POINTS OF CONTACT

EPA/regulatory agencies points of contact are:

TOSHIA KING
US EPA/OSW
Permits & State Program
Division
1200 Pennsylvania Ave.,
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Washington, DC 20460-
0001
Phone: 703/308-7033
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ANNASTACIA BRAYE
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e:-mail: braye.stacy@epa.gov

PROTOCOL AND POINTS OF CONTACT



If you have comments, please contact your appropriate Point of Contact before June 27, 2007.

PROTOCOL AND POINTS OF CONTACT

Special Issues

- The group agreed that specialized (subject matter expert) teams should be developed to craft different portions of the guidance for presentation to the “core” group attendees at the Washington DC meetings.



UPDATE ON EPA/DOD MEETING IN WASHINGTON DC

- Meeting held in Washington DC USEPA headquarters, March 14, 2007
- Opened with: GPRAs and the Subpart X universe.



Portion of the overall universe that is OB/OD and percent of units that need to be permitted (brought into control).

UPDATE ON EPA/DOD MEETING IN DC

Unit Universe

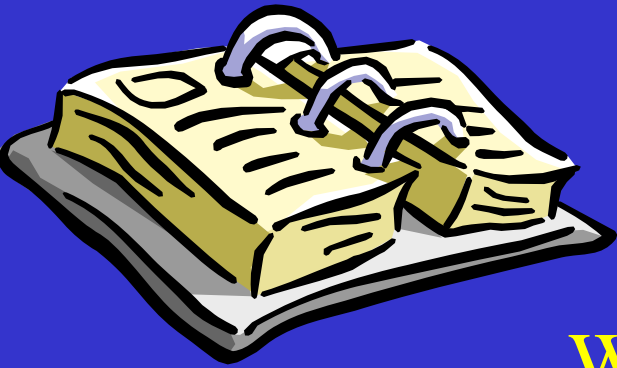


- DoD draft list of units showed status of the units they are aware of.
- EPA list and DoD list of units did not match.
- Agreed that the DoD list would be updated and submitted to EPA.
- EPA would cross check our list with theirs, and then
- Both EPA and DoD would have the same list.

UPDATE ON EPA/DOD MEETING IN DC

- Priorities of the permitting from the final list still need to be discussed.
- Requires agreement between DOD priorities and funding and EPA GPRA goals





UPDATE ON EPA/DOD MEETING IN DC

Virginia OB/OD Guidelines

Why are we making a new guidance document?

- We agreed that there were good parts in the VA guidelines*
- New guidance focuses on:
 - Nationally standardized steps and requirements for developing an application and
 - Guidance for regulators to permit these units more efficiently.

*we may borrow information for the new guidance;

UPDATE ON EPA/DOD MEETING IN DC

Virginia OB/OD Guidelines

- We, R9, agreed to review the VA guidelines and identify portions of the VA guidelines we may use in the new guidance



Including addressing those parts that were commented on in 2005.

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

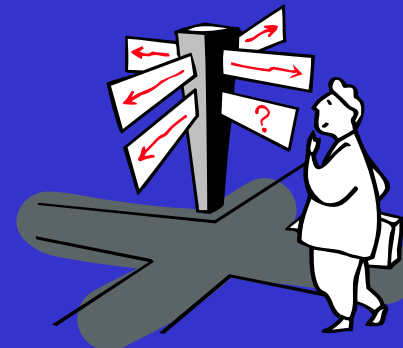


- Slide show on the checklist same as last presented in Las Vegas.
- Brought out many comments on the guidance and checklist.
- Guidance is not a rulemaking, but suggestions, things that should be considered, if applicable, to ensure a complete application.

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- All agreed that a national standardized guidance was needed
- Clarify for each state and facility what is needed to permit the OB/OD units.



UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- There are portions of the checklist that may be redundant with respect to a facility that is already permitted



But if the unit is in interim status, those portions in the checklist would only require referencing and not be redone

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- Regulatory authority EPA had in imposing noise and vibration requirements.
- Reduce the noise to be good neighbors,
- Sierra Army Depot order from California DTSC
- City ordinances limits

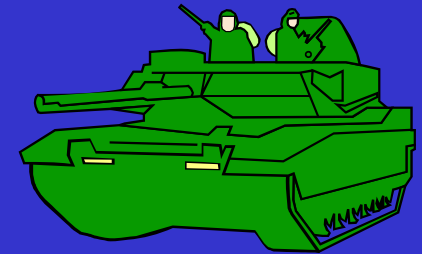


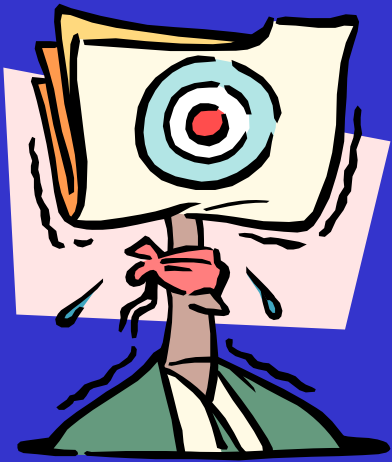
UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

Setting a Unit Boundary

- Using contamination concentrations to define boundary of a unit (especially non-detect)
- Unit in or adjacent to a range.
 - Ranges are not permitted
 - Units are managed under RCRA.
- We agreed to rethink the proposal for setting unit boundaries.





UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- Development of DQOs, SAPs and QAPPs.
- Applications are lacking in this area
- If a operation or an event is repeated regularly
 - One DQO, SAP and QAPP for many events (e.g. monitoring),
 - Be part of application
 - For review (e.g. COPCs, sampling pattern and data quality)

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation



- Should we include test development guidance for air emission factors?
- Concerned that OAQPS has not approved any of the air emission factors at this time
- A subject matter expert team should be work with AEC team to address air emission factors and coordinate with OAQPS

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

Test's DQOs, SAP and QAPP requirements should be established:

- To facilitate a more rapid AP-42 review form OAQPS and publication of these emission factors
- Everyone agrees with what should be submitted.



UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- Remediation
- Implies a unit's cleanup will be as broad in scope as used in CERCLA range requirements.

- Corrective Action
 - Cleanup
 - Characterization
 - Monitoring
- are RCRA actions



UPDATE ON EPA/DOD MEETING IN DC

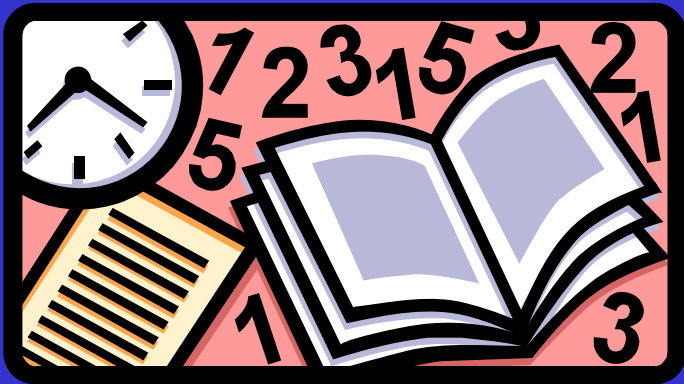
Guidance Overview Presentation

- SOPs developed by DoD for operations
- Two methods for incorporation of SOPs in to a permit:
 - by reference or
 - by inclusion in the application.
- Review of SOPs by the permit writer
 - To ensure there are adequate requirements for a RCRA permit.
 - Any additional requirements would be included in the permit, if needed.

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- No one disagreed with the “incorporation by reference” method
 - Concern about the copious number of permit modification that would ensue if the SOP were part of the permit.



UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation



- Establishing well location in a permit.
 - Prescription of monitoring
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- Each facility is unique
 - In some facilities well monitoring may not even be appropriate
 - Monitoring by be more or less frequent

UPDATE ON EPA/DOD MEETING IN DC

Guidance Overview Presentation

- Different methods for characterization
- DoD agreed a conceptual site model
 - Prior to application, to determine what is needed/applicable for a permit application,
 - Cost issues



CHARACTERIZATION

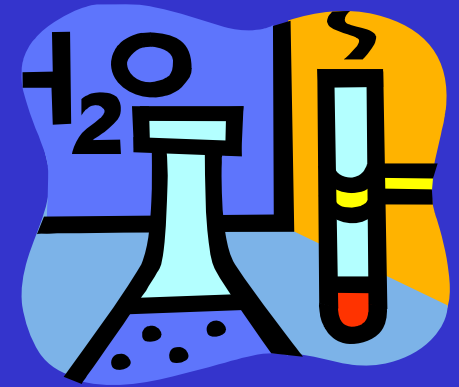
New method 8330B

- This new version B of SW-846-8330 can detect 18 different compounds that are included in manufacturing, impurities, and/or products of degradation with age.
- Includes a new sampling plan



CHARACTERIZATION

New method 8330B



- Uses HPLC
- The major change is that an appendix has been added that indicates the best sampling pattern
- Random dispersion

CHARACTERIZATION

New method 8330B APPENDIX



- Selecting sample collection,
- Handling, and

- Lab requirements
 - residues of secondary explosives and propellants
- DQOs, and.....,

CHARACTERIZATION

New method 8330B

- The sampling pattern
- sample points in a 10-meter by 10-meter area,
- North-South tight zigzag
- East-West tight zigzag pattern.





IN SUMMARY

- Comments are still being taken on checklist development and issues on permitting
- DoD comments through Randy Cramer or your service representative
- Regulator comments through Toshia King and Annastacia Braye
- Following this session, regulators have a breakout meeting at 1:00