



2015 JOCG Environmental Subgroup Update Global Demil Symposium

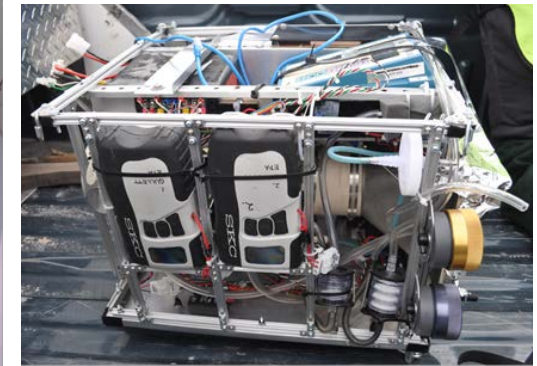
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JOCG Environmental Subgroup 2015 Activities/Accomplishments



- Provided technical support and review of the revised and new Open Burning and Open Detonation (OB/OD) emissions factors development as EPA progresses to new Web-based emissions factor inventory system.



EPA designed state-of-the-art analytical sampling package used on the Flyer

JOCG Environmental Subgroup 2015 Activities/Accomplishments



- Supported Director for Munitions and Chemical Matters HQDA, ODASA(ESOH) concerning open burning of M6 propellant.

- ❑ No heavy metals (Pb)
- ❑ No HCl, HCN, or NH₃ emissions
- ❑ VOCs total for burning all 15 M lb propellant, 200 lb (Note: Definition of Major Source is 10 tons)
- ❑ Main emissions CO₂, CO, NO and NO₂; all well below national standards

JOCG Environmental Subgroup 2015 Activities/Accomplishments



- Open burning received severe criticism inflamed by citizen protest and success in stopping OB of M6 waste at Camp Minden.
- Explosive Service International and their Contained Burn method of disposal be utilized for the disposal.



JOCG Environmental Subgroup 2015 Activities/Accomplishments



- LMD decision backlash echoing through permitted explosive hazardous waste facilities:
 - !! Notice of Deficiencies (NODs) in RCRA OB/OD permit renewals requesting justification of open burning in lieu of alternative demil technologies.
 - !! Use of universal DoD emissions factors questioned with States requesting site-specific air monitoring.
 - !! Future of open burning driven towards contained burn with no clear substantiated environmental benefit.

JOCG Environmental Subgroup 2015 Activities/Accomplishments



- Action Taken:
 - ✓ Briefed the JOCG EXCOM on these developing issues.
 - ✓ JOCG EXCOM Tasked the JOCG Environmental Subgroup with support of the JOCG Demil Subgroup to develop strategy to assess DoD open burning requirements and substantiate risks to human health and the environment.
 - ✓ Update the JOCG EXCOM during the next meeting in March.

JOCG Environmental Subgroup 2015 Activities/Accomplishments



- Meeting held with over 20 participating stakeholders.
 - ✓ Agreement that technical arguments fall flat on emotional concerned citizen groups.
 - ✓ Agreement that a overarching Risk Communication Strategy is needed.
 - ✓ Agreement that a DoD working group needs to be established, travel funds and approvals available, and meeting coordinated to normalize emissions factors, establish open burning needs, and share permitting templates for the status of alternative technologies.

JOCG Environmental Subgroup

Current 2016 Plans



- Answer the JOCG EXCOM call and inform them of other developments.
- Continue to formulate a risk communication strategy
- Continue to substantiate the real environmental impacts of open burning.
- Support installations in responding to permit NODs.
- Continue conferencing with a JOCG Environmental Subgroup meeting in January.