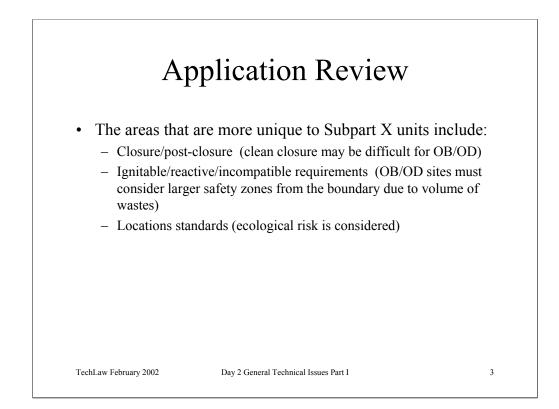


General Information includes:

ID Number/description	Notices
Waste analysis	Security
Inspections	Personnel training
Ignitable/reactive/incompatible requirements	
Locations standards	
Construction quality assurance	
Preparedness & prevention	
Contingency plan	Record keeping
Corrective action	Closure/post-closure
Financial assurance	Waste minimization

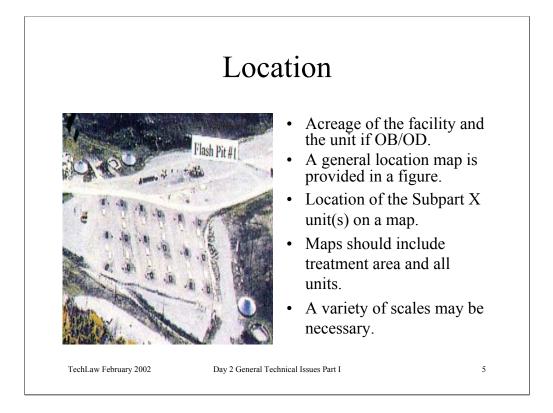


The following sections should be treated like any other treatment facility:

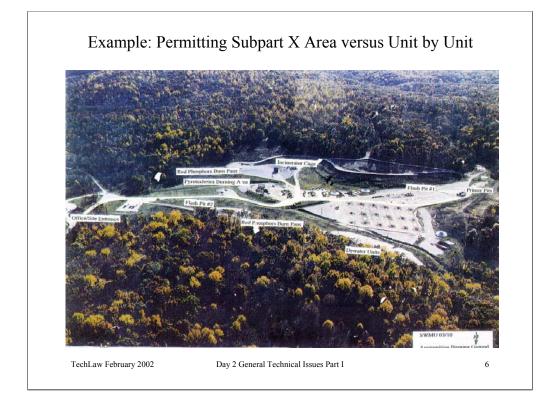
ID Number/description	
Notices	Security
Inspections	Personnel training
Financial assurance	
Construction quality assurance	
Preparedness & prevention	
Corrective action	
Contingency plan	
Record keeping	
Waste minimization	



The mission of the facility should describe the general operation of the facility in a manner that the general public will understand what is happening at the facility.

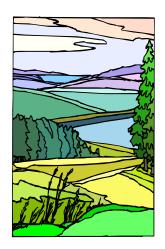


Because some facilities are extremely large, several maps at different scales may be necessary to show features of the facility. Even though the regulation requires a certain scale, the permit writer needs to be flexible requiring the detailed scale map of the unit versus the facility in these cases. Just make sure all the features required are shown on the maps.



This is an example of a facility that was permitted as an open burning area with several types of burning units within the area. (Site is Naval Surface Warfare Center, Crane, Indiana)

Land Use: Entire Facility Coverage is Necessary On-site and Off-site

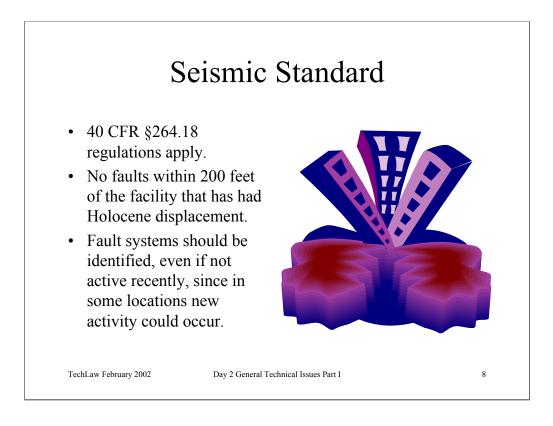


- Risk assessments will need detailed information on populations and ecology off-site, especially down wind and down gradient of the unit being permitted.
- Other geologic locational issues should be considered, including rock and mud slide areas, and wetland locations. Volcanic and karst areas are not preferred.

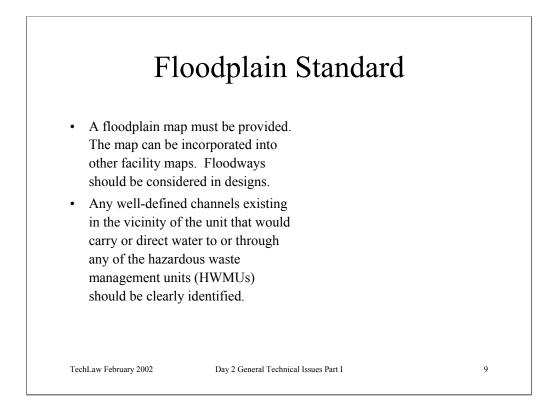
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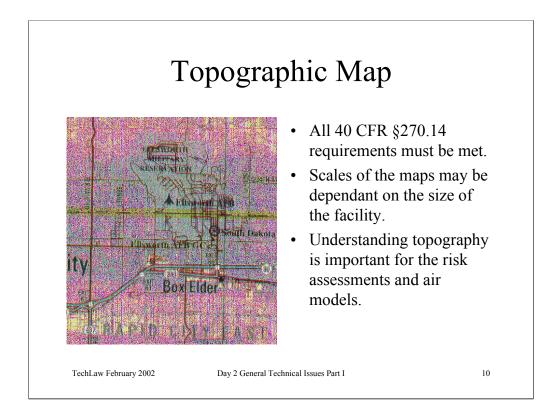
7



The United States Geological Survey is a source of information on earthquake activity in an area of the United States.



Floodplain and floodway locations can be checked through the local county surface water agency.



Precipitation for area.

Types of soils.

Run-on and run-off patterns.

Location of any well (monitoring, process, drinking, other uses).

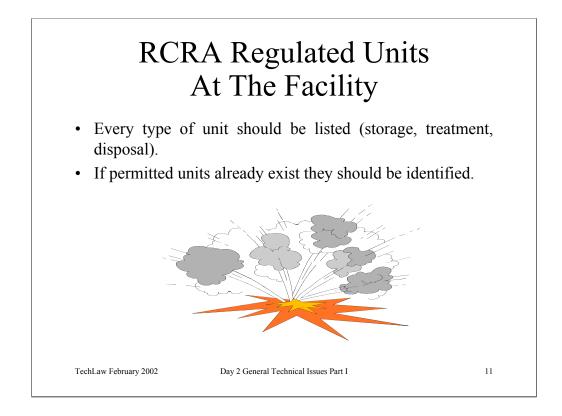
Location of any springs, karst zones.

Location of any headwaters or intermittent streams near the unit.

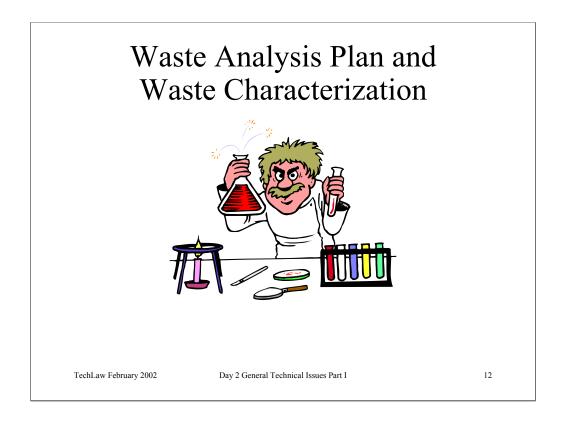
General drainage patterns at the unit, and the surrounding area, including gradients.

Location of any wetland vegetation.

Location of closest water bodies.



The application should describe what units already have operating or post-closure permits. The unit seeking a permit should have other regulatory permits identified, such as Clean Water Act or Clean Air Act permits.



The permittee may characterize its wastes either through analytical procedures or by generator knowledge.

Generator knowledge may be necessary for munitions that are reactive and no testing procedures may exist.

When generator knowledge is used, the permittee should document how those decisions were made for auditing purposes during an inspection. This information typically will relate back to the process of how the waste was generated.

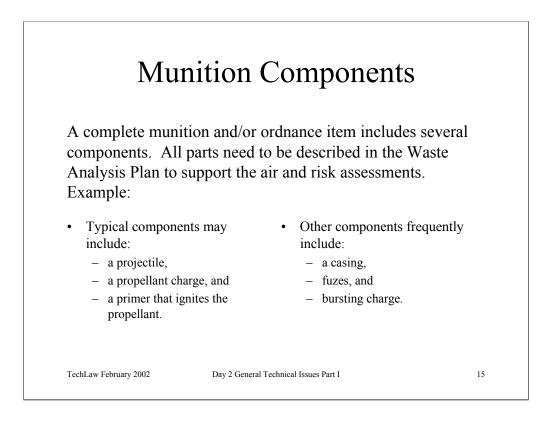


If wastes are only accepted from certain sources, such as other military bases or State emergency response units, then they should be identified, and the permit should limit these sources. Otherwise, the facility would be considered a commercial treatment facility and would be able to accept those permitted waste types from anyone.



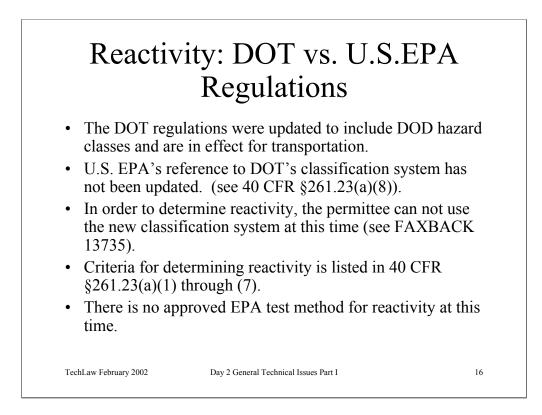
ATF P 5400.7 (09/00) Federal Explosives Law and Regulations – 2000 is available on the Bureau of Alcohol, Tobacco and Firearms website (www.atf.treas.gov).

§55.23 of this guidance provides a list of explosive materials.



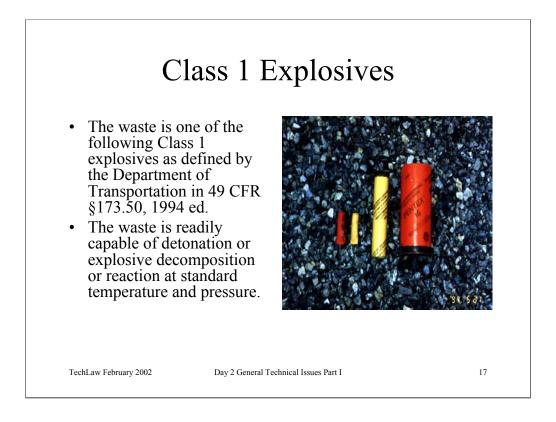
The permittee should supply as complete a listing as possible of all the components that go into a munition that may be treated in a unit. These "extra" parts may be drivers in the risk assessment.

An example would be for Naval Surface Warfare Center, located in Crane, Indiana. It was the metal casing components that emitted lead and manganese during open detonation that limited the operational treatment rates. Metals and not explosives were the key to ecological risk in that case.



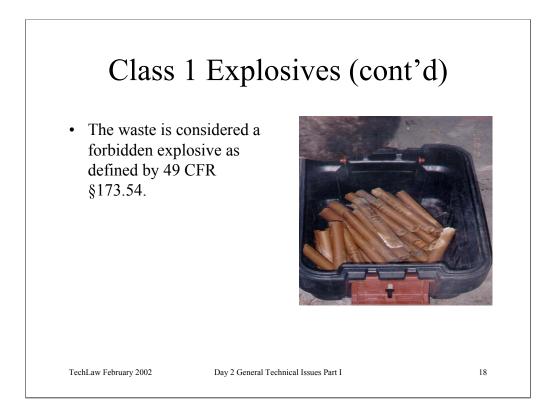
64 FR 27266 (May 16, 2001) explains that listed wastes which are solely listed for a characteristic are not listed if they do not exhibit the characteristic at the point of generation. This affects a number of listed wastes which were listed solely on the basis of reactivity, including:

- K044 Waste waste treatment sludges from explosives
- K045 Spent carbon from treating explosive waste waters
- K047 Pink/red water from TNT operations
- P081 Nitroglycerine
- P112 Tetranitromethane
- P009 Ammonium Picrate
- U096 Cumene hydroperoxide
- U189 Sulfur phosphide



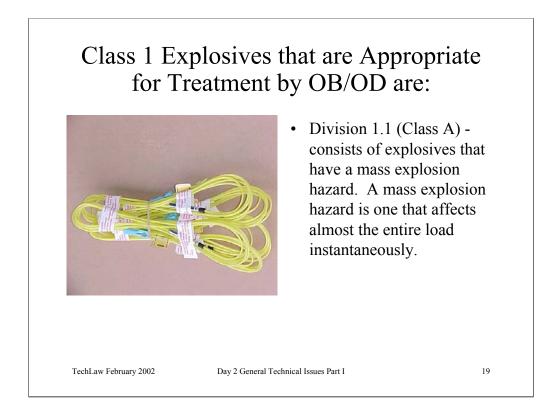
The following series of slides identifies DOT's classification of explosives. The EPA Classes A, B and C are shown in reference to the new DOT classification. The DOT rules are in effect and explosive handlers, including waste explosives, must comply with the new rules for transportation.

The slides give a pictorial view of what the explosives look like.

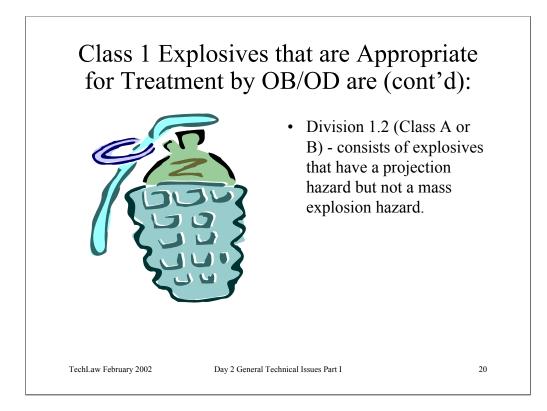


Link to the http://dot.gov web site for the list of forbidden explosives.

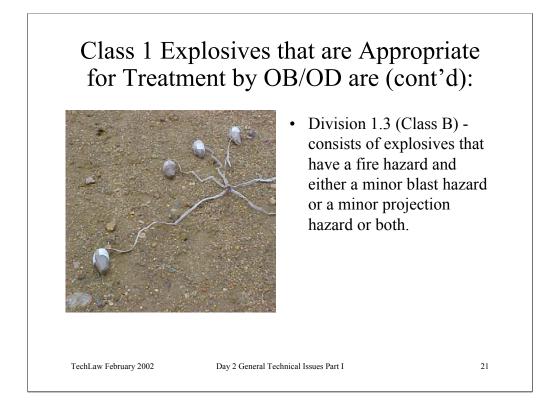
This list includes illegal fireworks such as M-80s.



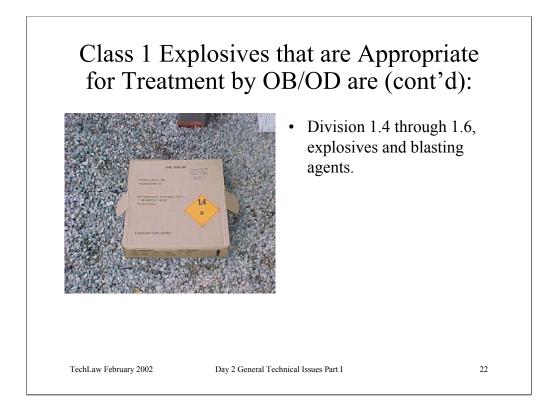
Examples: dynamite, detonator (cap) sensitive emulsions, slurries, water gels, cast boosters, mass detonating detonators.



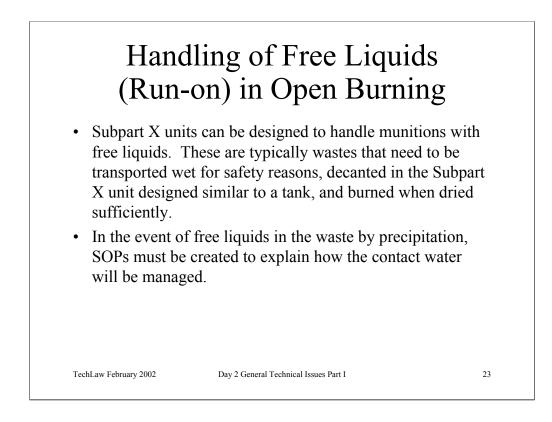
Examples: Certain types of ammunition, mines, grenades.



Examples: Certain types of fireworks, propellants, and pyrotechnics.



Examples: detonators, consumer fireworks.



Handling Precipitation:

Corrective action methods to resolve free liquids should be in an SOP.

Removal method must be described: siphoning, draining, decanting, solidification, etc.

Effect of precipitation on the treatment process and the waste needs to be described.

The liquid must be containerized in an approved liquid container (i.e., steel closedtop drum with threaded bung and special liner, or ABS, polyurethane, or similar inert plastic drum with threaded bung).

Management of Wastes with Free Liquids in Open Burning

• Sludges with free liquids that have to be transported for safety reasons in a semi-solid form need to be managed in a dewatering style of burn pan.

- Dewatering units must meet the secondary containment requirements of tanks.
- The units also must be able to withstand the effects of burning.
- Secondary containment would be required if liquid bearing wastes are allowed.
- Open burning of solvents is not preferred due to the creation of dioxins in the thermal process.

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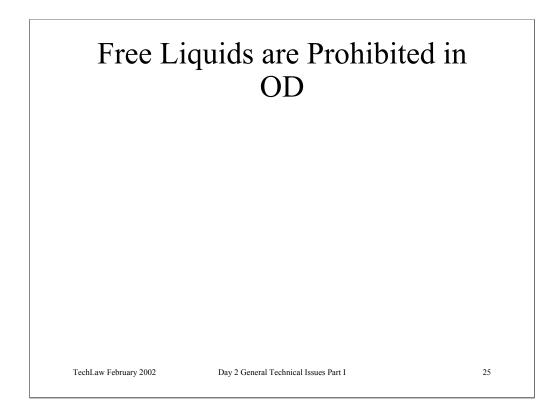
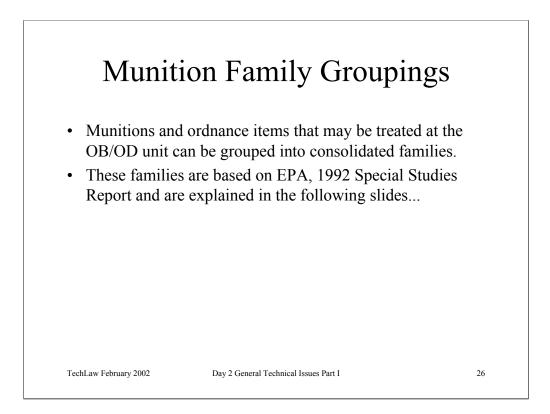
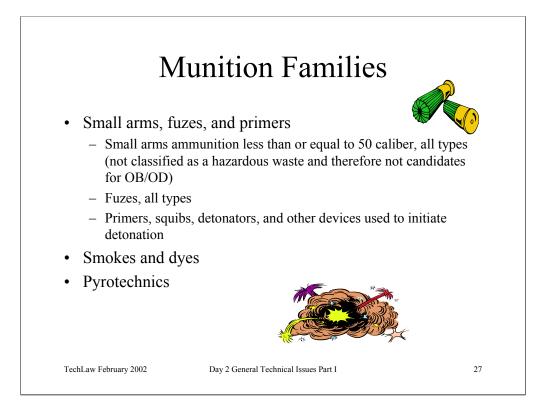
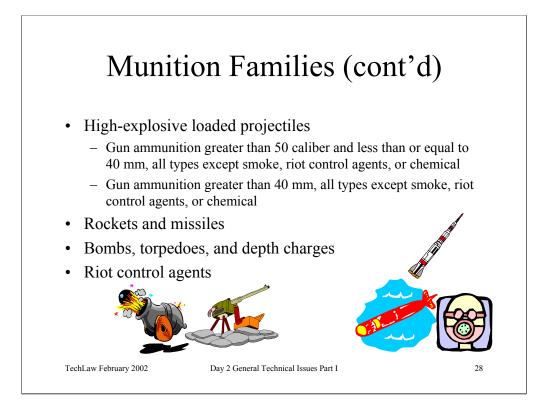


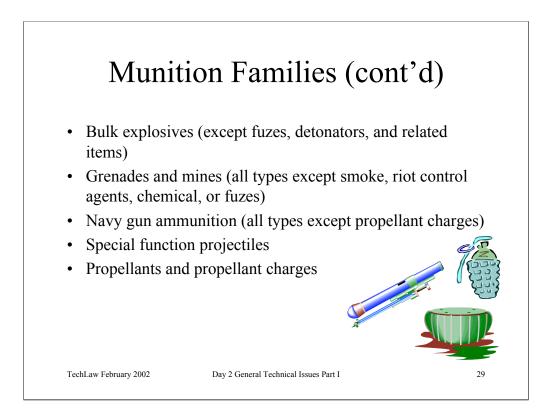
Photo of the surface of the Open Detonation range at Jefferson Proving Grounds, located in Indiana.

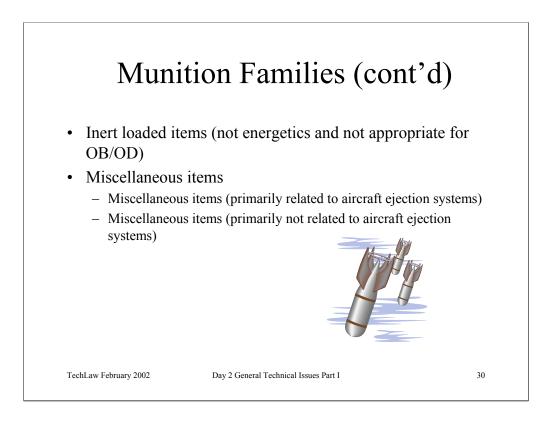


If the permittee wants to develop its waste analysis plan (WAP) based on munition family groupings, you still need to have identification of the components related to that family.

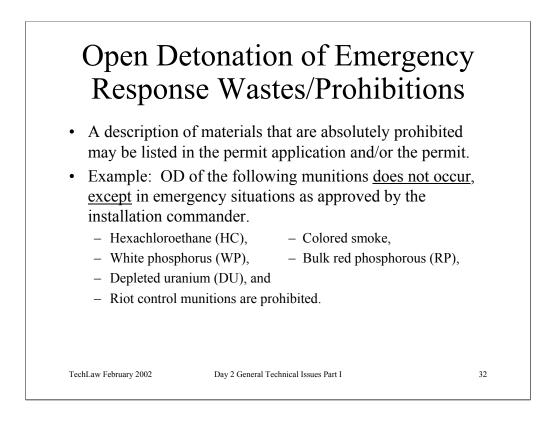






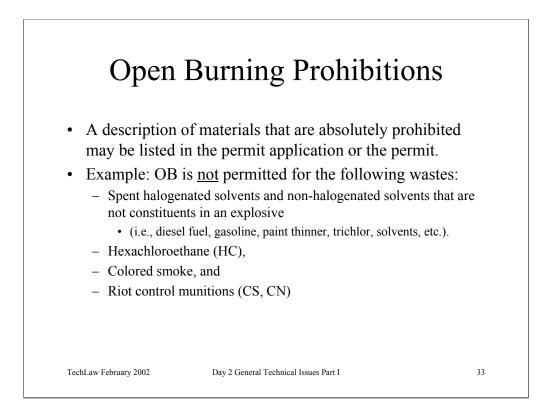






If the permit writer decides, based on the risk assessment or other information, that certain wastes need to be prohibited, the permit writer can list these prohibitions in the permit.

An example would be a permittee requesting to treat explosive contaminated solvents. The permit writer could justify not allowing treatment of this waste based on the potential dioxin creation that could not be controlled and would add significant risk to the unit.



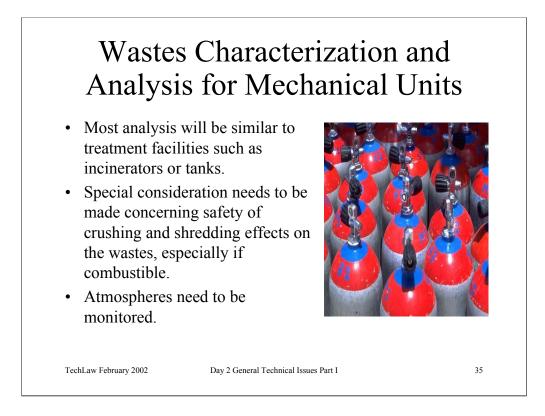
Open Burning Emergency Response Waste/Prohibitions

- If emergency response treatment occurs at the facility these materials must be incorporated into the permit application. This includes use of a range by law enforcement or other agencies under RCRA exemptions or emergency permits.
- Example: OB of the following munitions <u>will be allowed</u> only for emergency destruction purposes and by authorization of the installation commander.
 - White Phosphorus (WP),
 - Red Phosphorus (RP),
 - Class 1.4g Consumer Fireworks

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Waste analysis needs to address what goes in and what comes out.

Compatibility during the treatment process needs to be considered, especially if residues remain in the unit during different treatment events.

Watch for build up of gases during the treatment process.

Watch process rates so that waste does not build up to cause an unusual reaction.

Waste Characterization for Other Subpart X Units

- On any type of unit, the incoming waste needs to be defined for its constituents. Treatment residues also need to be defined. Especially if treatment is rendering the material non-hazardous.
- Special consideration for vitrification needs to be made since sampling of the vitrified material might have problems showing the treatment is effective, due to the analysis process. CERCLA projects should be referred to for waste analysis plan details.

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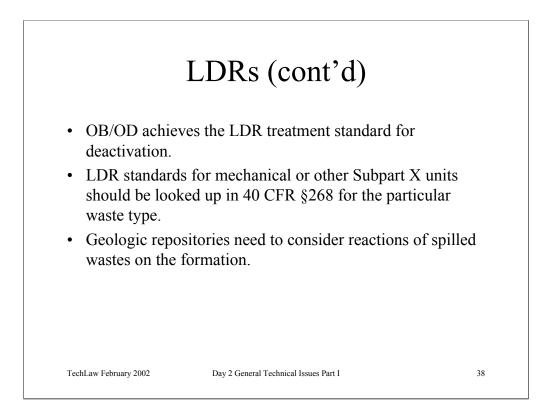
Land Disposal Restrictions (LDRs)

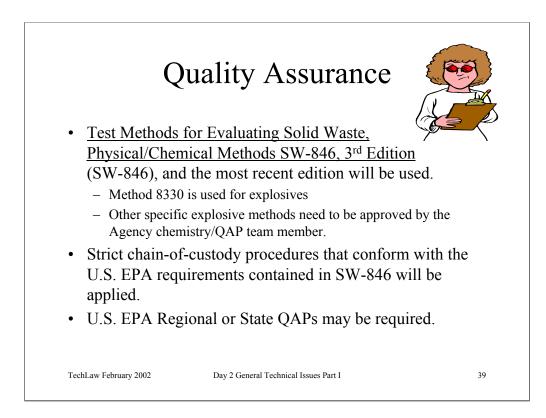
- Munitions treated at OB/OD will tend to have the characteristics of reactivity, or ignitability and possibly toxicity characteristic for lead. The Land Disposal Restrictions (LDR) treatment requirements listed in 40 CFR §268.40 for explosives subcategory D003 wastes is deactivation and attainment of the treatment standards listed in 40 CFR §268.48.
- Underlying hazardous constituents that may be present in the wastes treated are listed in 40 CFR §268.48.

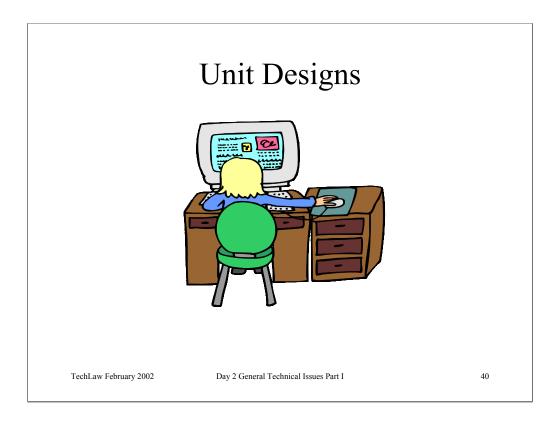
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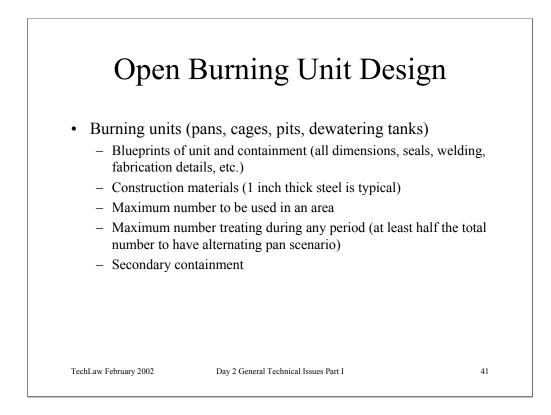
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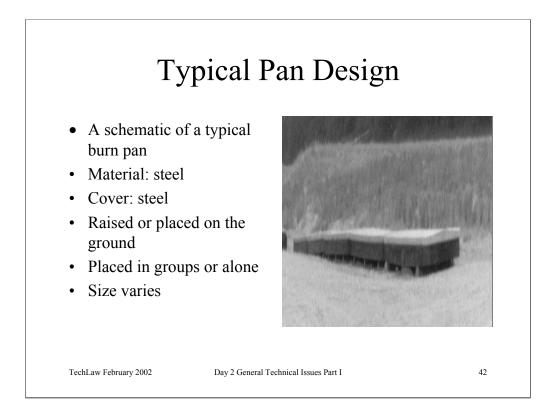
37







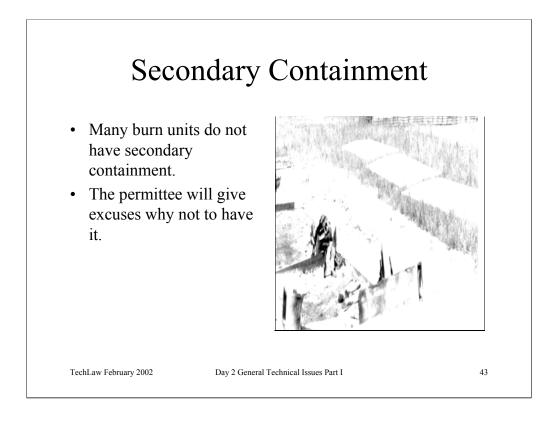




In the photo: each pan is elevated approximately 1 foot. The position of the legs of the structure allows for easy inspection of the bottom of the pan and the surface of the ground beneath it.

In the photo: the burn pan is situated above ground on two I-beams to allow visual inspection for leaks.

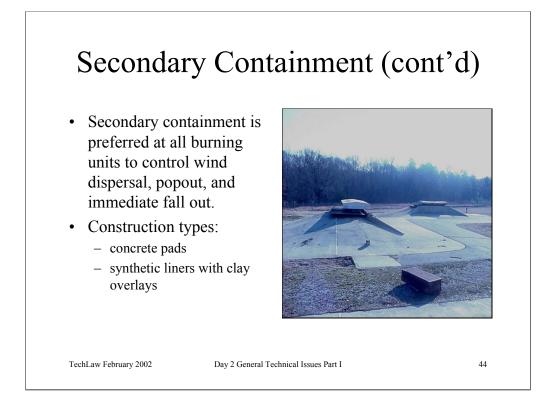
Not all pans are raised.



Examples of excuses:

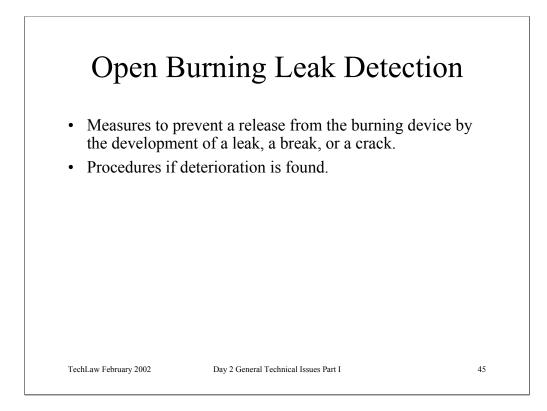
There is no need to construct secondary containment in the OB area to be fully protective of the environment.

Any ejecta is collected during the post-burn inspection and is reburned the same day.



Secondary containment at dewatering burn units must meet the tank standards.

Secondary containment can be enforced if soil sampling shows that explosives are entering the soil. Continued deposition can cause a risk. Since explosives are not naturally occurring, an impact from the unit is clear. It will pose a human or ecological risk based on the concentration. The unit must be designed and operated to provide protection to the environment, concentration is not a key factor (see 40 CFR §264.601).



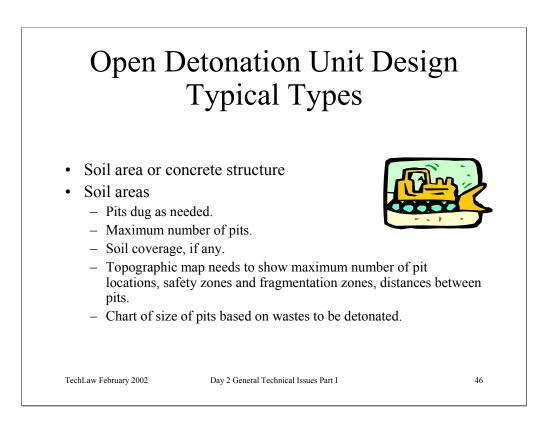
Release prevention:

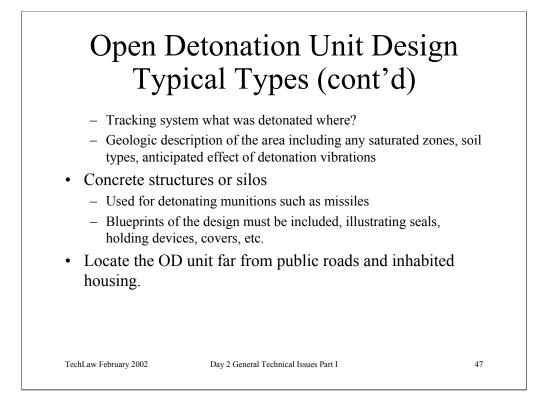
Performance of a pre-burn and post-burn integrity inspection.

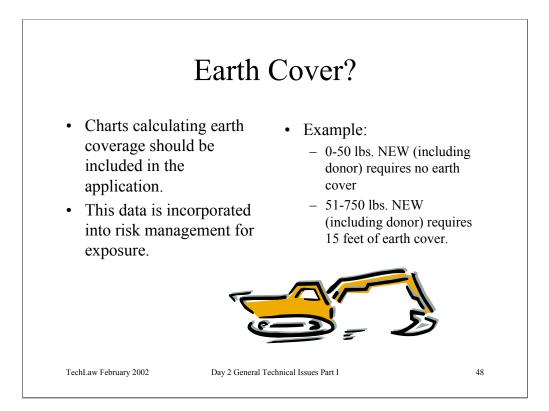
Placement of the pans above ground on two I-beams to allow visual inspection for leaks.

Performance of structural integrity tests of steel pans or other burning containment devices. Tests results should be submitted or available for review.

Deterioration: The burning device is removed from use. Damaged burning devices are repaired prior to being returned to use.







detonations to	ces from abov unprotected p	0	
Material to detonate	Blast distance	Fragment/ debris	
Non-frag explosive material	D = 328 W**1/3	1,250 feet	
Bombs and projectile with a diameter less than 5 inches	$D = 328W^{**1/3}$	2,500 feet	
Bombs and projectiles with a diameter of 5 inches or more	$D = 328W^{**1/3}$	4,000 feet	
All other ammunition	$D = 328W^{**1/3}$	2,500 feet	

This table is an example from a Utah permit application.

			(con	it'd))			
Table. Required blast overpressure protectiondistances to nonessential personnel									
NEW									
in lbs.	lbs. Distance in feet for various burial depth								
	0 FT	1 FT	2 FT	3 FT	4 FT	5 FT	7 FT	10 FT	15 FT
	COL A	COL B	COL C	COL D	COL E	COL F	COL G	COL H	COL
1	328	79	16	16	16	16	16	16	16
5	561	261	104	41	28	28	28	28	28
10	707	398	191	92	44	35	35	35	35
20	890	464	326	182	102	57	45	45	45
30	1019	566	368	260	157	94	51	51	51
40	1122	650	439	329	208	131	62	56	56
50	1208	721	501	349	255	166	71	60	60
100	1522	984	737	553	414	326	165	76	76
150	1743	1171	911	708	550	428	256	105	87

This example is from a Utah permit application.

This table addresses the required blast overpressure protection distances to nonessential personnel from ranges used for detonating ammunition for the purposes of demilitarization, demonstration, or explosives ordinance disposal.

OB On The Ground Surface Where Unit Incorporates Soil As Part Of Unit

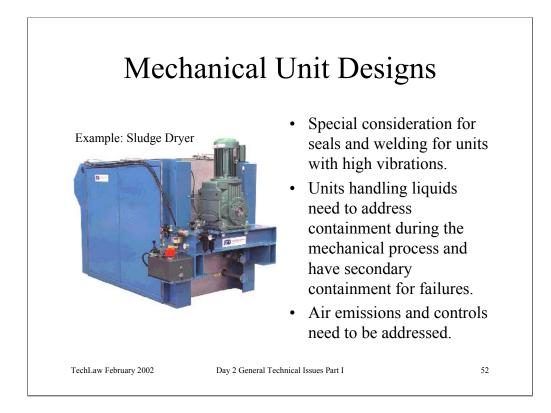


• U.S.EPA does not approve of this method. (EPA 1997 Guidance)

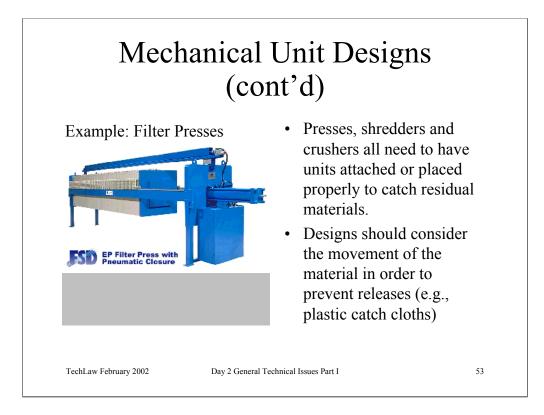
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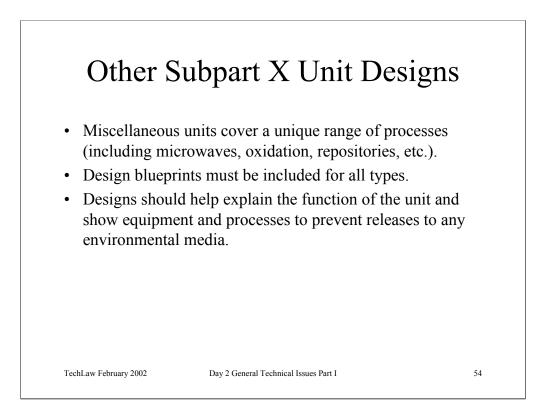
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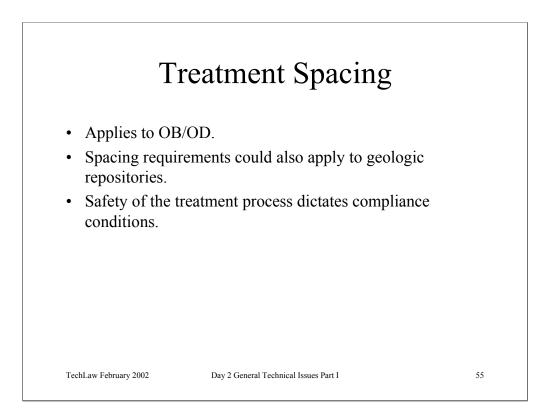
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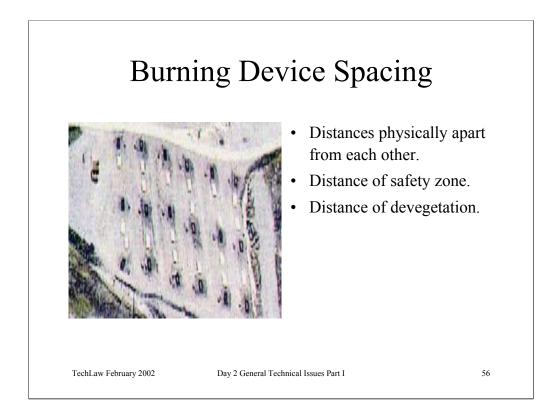


Detailed blueprints must be included in the permit application.





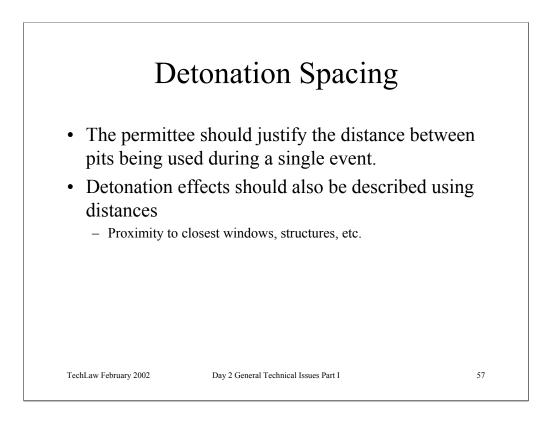


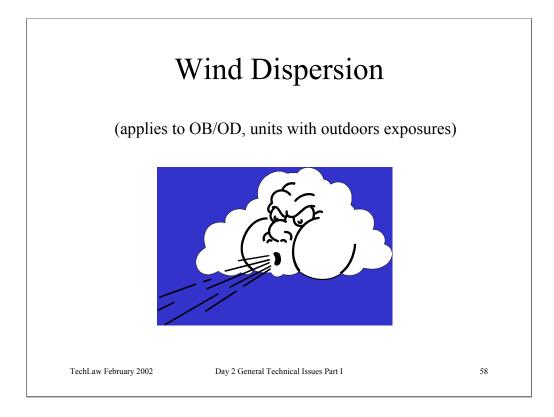


Treatment spacing also needs to be described.

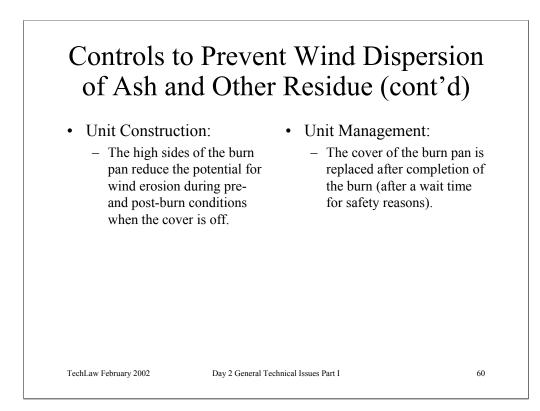
Pans are arranged so that the propellants burn in the opposite direction from which the prominent wind direction is blowing.

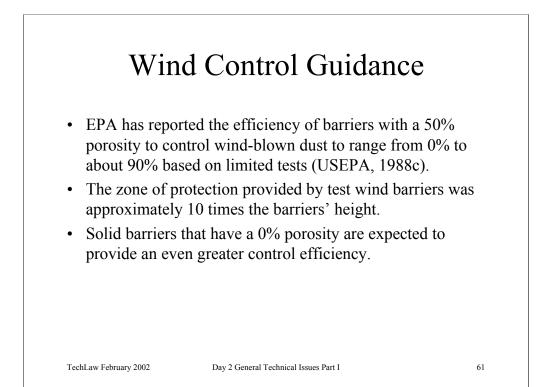
Example: pans are approximately 60 feet apart.

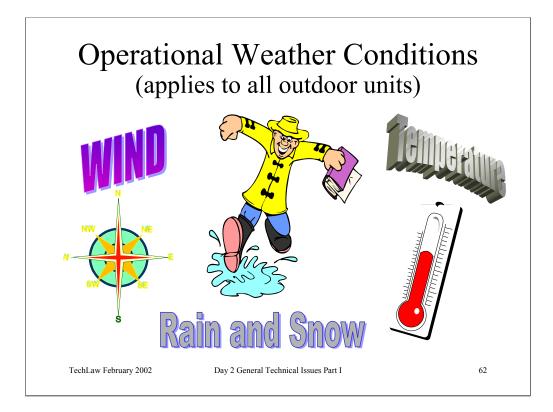


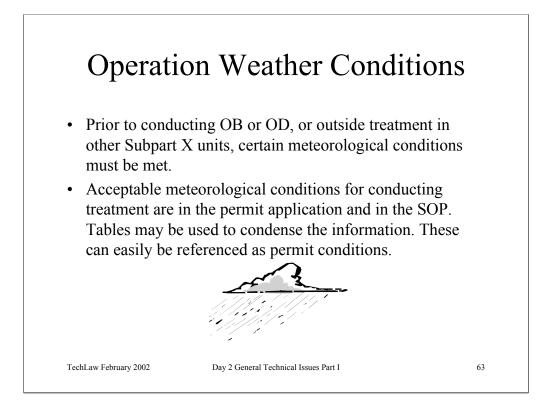


Controls to Prevent Wind Dispersion of Ash and Other Residue • Operational Weather • Waste Type: Limits - Wind dispersion of these energetic wastes is not a problem, due to their physical form. - Propellants are generally in the form of pellets, - Other energetic materials are contained in casings. TechLaw February 2002 Day 2 General Technical Issues Part I 59



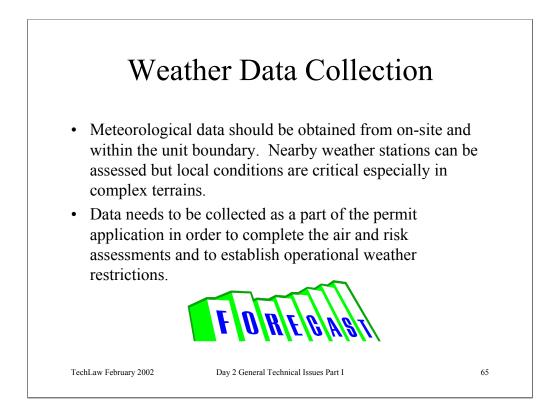






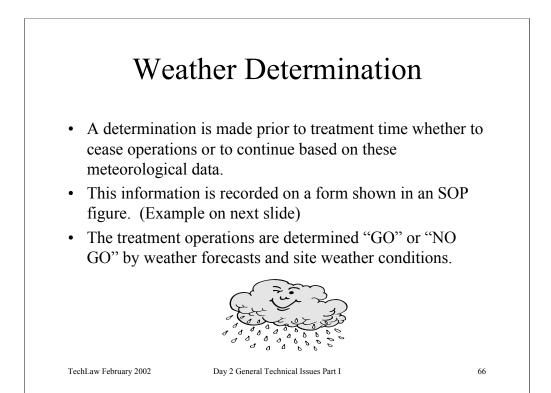
	meters
Parameters	XXX Requirement
Wind speed for propellant burn	3-20 mph/gusts to 30 mph
Wind speed for detonation	3-15 mph/gusts to 30 mph
Cloud cover (see note)	<80%
Ceiling	>2,000 ft.
Precipitation	<75% chance
Snow	
Thunderstorm/electrical storm	<50% chance
Clearing index	>500
Visibility	1 mile
Operations shall not be carried out with a cloud ceiling is less than 2,000 to	s are in conjunction with each other. when the cloud cover is greater than 80 ft. te:
	Parameters for Triple X Facility

This is an example from a Utah permit application.

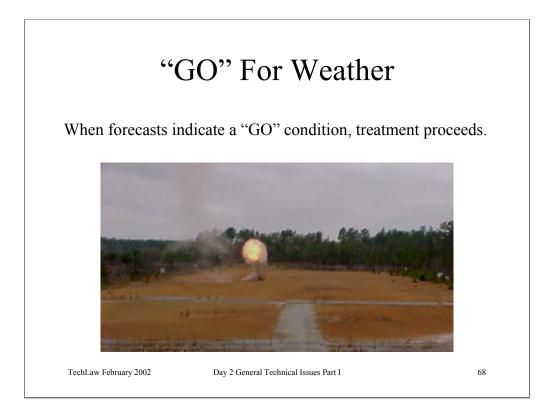


A weather station should be placed at the unit, and located in an area to address any complex terrains.

Weather conditions such as wind direction and speed, air temperature, humidity, precipitation, cloud coverage, ceiling, and visibility need to be collected to determine a "go" or "no go" for treatment. These parameters are fairly uniform between sites but are also based on site-specific conditions of the type and amount of treatment allowed. Some sites may have tighter weather provisions if there are noise concerns.



Form								
	Forecast for Today		Today's Actual Conditions at:					
Area for	Loc.	Loc.	Loc.	Loc.	Loc.	Loc.	Loc.	
	NWS/OBT	NWS/OBT	NWS/OBT	NWS/OBT	NWS/OBT	NWS/OBT	NWS/OBT	
Information received from								
Projected time of detonation	Time:	Time:	Time:	Time:	Time:	Time:	Time:	
Wind speed								
Wind direction surface								
Wind direction 10,000 ft.								
Cloud cover								
Ceiling								
Temperature								
Inversion height								
Clearing index								
Visibility								
Precipitation problem								
Thunder problem								
General Forecast:								
Forecaster:	8	ources						
Demil, Planner	Go		No G	0				



"NO GO" for Weather

- If the weather conditions deteriorate a determination is made whether to continue the treatment operation; with the munitions already in the pan or to leave the munitions in the pan and burn it the following day, or if there are munitions already in the detonation range.
- If the wastes are held over until the next day, the Environmental Management Division should be notified so that it can brief the state permitting and inspection personnel about why the munitions were left untreated.
- Under no circumstances is propellant placed in open burning or open detonation after weather conditions have deteriorated.

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