

Questions and Answers - Community Meeting April 2014

1. May we, realistically, close our local Open Burning Ground (OBG)? In 5 years? 20?

a. Open burning and open detonation are primarily performed for safety reasons under strict control and policy of the Army and AMC regulations.

2. What percent of the tons of waste burned most days at the arsenal is placed on the pile at the OBG as opposed to burned in the one incinerator currently operated by BAE for that purpose? What GOCO partnership built this incinerator? When?

a. The Army has 35 permitted OBG sites. Open burning or detonation of reactive and/or explosive hazardous waste is allowable and governed either under exception or permit as land treatment or "miscellaneous treatment" under EPA and State Resource Conservation and Recovery Act and Clean Air Act regulations. Open burning and open detonation are primarily performed for safety reasons under strict control and policy of the Army and AMC regulations.

3. How many open burning grounds (for hazardous munitions waste) remain open the US military today? Where are they? Is closing the OBGs a thing that the US Military, including Radford, ultimately would like to do and is there only a "handful left", as we were told at a recent public meeting?

a. We have two incinerators that operate together. The incinerators were built in the 1980s with Hercules as the operating contractor.

4. Do the US Military and BAE currently have a plan in place to reduce open burning of hazardous waste at the RAAP by a certain percent, by a certain date, by either buying/building more incinerators, or culling more of the nonhazardous stuff out of the hazardous waste stream?

a. We have integrated management plans for all materials at RFAAP, not just waste. Our Environmental Management System is certified under the International Standards Organization (ISO) 14001 standard. That system includes goals and objectives to reduce waste through better product yields, reuse, recycling and reduction.

5. Taking into account that Picatinny is for R&D and Radford for the production of arms, why is New Jersey so much cleaner than Virginia? Are we bound by the same federal EPA regulation and do we face the same difficulty with grinding when it comes to placing hazardous munitions waste in an incinerator?

a. Whether New Jersey is cleaner than Virginia is an open question. EPA tracks 110 clean-up sites in Virginia and 229 in New Jersey. New Jersey has 1 clean-up site for every 38 square miles. Virginia has one for every 220 square miles. Yes we are bound by the same federal regulations. Yes, grinding potentially explosive material presents difficult challenges to ensure the safety of our workers and the community. Materials that cannot be ground safely cannot be introduced into the incinerators. R&D usually deals in smaller quantities of propellants and the production of new propellants is limited in size because of the very nature of research.

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6. Why is BAE Systems continuing the process of igniting wastes at the Open Burning Ground using 12.5 gallons of diesel fuel per pallet, known as "skid burns," despite being warned in 2005 that they are more toxic than the hazardous waste incinerators because they spew Dioxin & Furans in our air with every burn?

a. Our procedures were reviewed by the VA DEQ and determined to be protective of human health and the environment.

7. Why are there no warning signs posted on the New River at Bisset Park for floaters, fishers or boaters about the potential need to "evacuate the river, we are about to begin explosives burning" as required in the permit for the Open Burning Ground?

a. Our procedures have extensive safety requirements listed in them including red flashing lights and a warning speaker system to notify people on the river that a burn is going to occur.

8. Why are there no fish warning signs about the PCB (polychlorinated biphenyls) contamination of fish tissues posted on the New River at and downstream of RAAP?

a. During 2009 and 2010 an extensive study of the New River for PCB contamination was conducted by the VA DEQ and Virginia Department of Health (VDH). The results showed that RFAAP was not a source of the PCB contamination in the New River. Maintenance of the signs is not RFAAP's responsibility.

9. Why has BAE Systems failed to agree to pay for air quality monitors in the areas identified in the CH2MHill Health Assessment of 2005 as the receptor points for the hours-to-days-long fall-out of Particulate Matter (PM) after each Open Burn?

a. The document in question was reviewed during the permitting process for our existing permits. It was determined that the method mentioned in the report was not proven or as protective of human health and the environment as the emissions factors and waste limits that are used currently.

10. Does BAE plan to request a permit modification for the OBG that would allow open burns with higher chromium content per pound, as proposed in 2013?

a. Unknown at this time