



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MEMORANDUM

Subject: The Use of a Dialogue Committee at Camp Minden and its Uniqueness

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To: Camp Minden File

This is a memorandum to the Camp Minden File to outline the use of the Dialogue Committee at Camp Minden and why it is unique to this site.

Issue:

The Dialogue Committee was a unique concept for an exceptional situation and should not be applied to other time critical or emergency response actions.

Background:

On October 28, 2014, an administrative order on consent (AOC) was signed by the Army, LDEQ, Louisiana National Guard (LNG), and EPA. This AOC outlined that controlled open burning was the technology that should be used to destroy the M6 and CBI material at Camp Minden. On January 14, 2015, LDEQ and LNG sent a letter to EPA stating that the State of Louisiana was not given options for disposal technologies, nor was it a part to the EPA selection process. So on January 15, 2015, EPA immediately suspended compliance deadlines in the AOC by 90 days to provide LDEQ and LNG the time necessary to review alternatives and include local elected officials and the community in the process. The concept of a Dialogue Committee was the result of a suggestion from one of the local citizens. EPA assisted with the development of this Committee to assist the State with its efforts to investigate alternatives to controlled open burning with public engagement.

Discussion:

The Dialogue Committee served its purpose in this unique situation by assisting the State with its evaluation of various technology alternatives. The circumstances that make this an exceptional situation include the following:

- The size and the immediacy of the threat. 16 million pounds of unstable and degrading M6 and clean burning igniter pose an imminent and substantial risk of self-ignition.

- Both the State of Louisiana and the Federal Government (Army) were responsible parties.
- Funding for the cleanup had to be procured through the US Department of Treasury.

Conclusion:

The Dialogue Committee process was a benefit to the State in this situation to assist in a short timeframe in the evaluation of alternative technologies for disposal of the M6 and CBI. This process took a large amount of public and private resources to accomplish the task on schedule. However, in situations without the peculiarities of this site, there are other mechanisms and different timing for public engagement. 40 CFR 300.415(n) outlines the community relations for removal actions. Therefore, this Dialogue Committee framework is not appropriate for other responses actions.