Responses to Public Feedback on the Draft Camp Minden Baseline QASP

EPA developed an air and soil baseline Quality Assurance Sampling Plan (QASP) to capture pre-operational (before the implementation of the destruction technology) conditions at Camp Minden. These results will be used to compare against operational (during the implementation of the destruction technology) and post-operational (after the completion of destruction activities) values to evaluate if there has been any measureable impact. On April 15, 2015, EPA conducted an environmental monitoring/sampling workshop to discuss various environmental measurement equipment and the draft air and soil baseline QASP which was posted on-line on April 9, 2015. During the workshop, EPA requested feedback from the participants by April 20, 2015. Below is a summary of the feedback EPA received.

Comment: Several commenters raised a concern over the current sample locations being too far away during the operational phase of the destruction method.

Response: Thank you for your input. This QASP is for baseline air sampling and monitoring. The intent of the proposed locations is to show air quality parameters in the local communities around Camp Minden before any activities to address/destroy the M6 and CBI begins. The data collected during this baseline sampling and monitoring will provide information to determine if the activities at Camp Minden are potentially impacting the community. Once Louisiana Military Department selects a contractor and technology, it will prepare QASPs for the operational and post operational phases. Specifics of those plans will be based on the technology and location(s) of the technology and any handling or storage areas outside of the bunkers. In addition, EPA will prepare a QASP to oversee and verify LMD's data and to make sure the public is protected. Specifics of this operational and post operational QASPs will be made public prior to implementation of the action.

Additional sampling locations were suggested during the feedback period and were evaluated by EPA. In general, EPA prefers to select sampling locations for baseline sampling and monitoring on public property rather than private or commercial to minimize any disruptions to private or commercial landowners caused by the sampling activities and to ensure that results can be widely published. Additional baseline locations maybe added based on the location of the new LMD remedy.

Comment: A recommendation was made about the need to include pH and RCRA Heavy Metals in our baseline soil analysis. The commenter stated that since some of the alternative destruction technologies involved the use of acids, bases and RCRA heavy metals, therefore, pH and RCRA Heavy Metals should be added to the baseline soil analysis.

Response: Based on these points, EPA agrees and has added these constituents to the baseline soil sample analysis.

Comment: Several individuals suggested that EPA also conduct baseline sampling of surface water and groundwater.

Response: EPA will ensure a baseline surface water and groundwater QASP is prepared and implemented prior to operations.

Comment: Several analytes, specifically the SVOC's and dioxin/furan compounds are bio-accumulated, residual and weakly metabolized within organisms, both flora, fauna, and human. Therefore, bio-monitoring should be considered.

Response: Environmental sampling and monitoring will be conducted prior, during and post destruction of the material at Camp Minden to ensure that the operations meet applicable environmental regulatory standards and to ensure that the operations do not impact environmental conditions at Camp Minden and the surrounding area.

In 1992, a comprehensive human health and ecological risk assessment were conducted as part of the Superfund Remedial Investigation at the Louisiana Army Ammunition Plant (LAAP). The investigation included sampling of fish, macroinvertebrates and algae in Boone and Caney Creeks. The risk assessment concluded that dioxins were not a contaminant of potential concern at LAAP.

Comment: Analytes that are scheduled to be monitored during the baseline include NOx, SOx, CO, CO2, and PM2.5 and PM10. Concern remains as to why ground-level O3 is not addressed in either the sampling or monitoring protocols.

Response: There is an existing ozone monitoring network in northern Louisiana and east Texas that is sufficient to evaluate ozone in these areas.

Comment: Why is CO_2 listed as an analyte to be monitored? Concern remains that having CO_2 monitoring protocols implies a highly-emissive thermal or incineration technique may still be under potential consideration.

Response: CO_2 will be produced by any treatment technology, this does not signal a type of treatment.

Comment: Neither reference notes any NIOSH, EPA, or OSHA toxicity levels for any of the non-criteria pollutants. Concern remains that workers, employees, and the general public are not adequately informed regarding this data.

Response: This baseline QASP is designed to capture the environmental conditions around Camp Minden prior to initiating any destruction technology. Worker safety will be addressed in the site's Health and Safety Plans which will include the appropriate OSHA requirements.