Email from Col. Stuckey to Dialogue on 2/27/15

## CLASSIFICATION: UNCLASSIFIED

Mickey,

We have provided M6 Propellant in another instance to support a vendors conceptual plan to dispose of this material, so it can be done but is a pretty lengthy process. I will attempt to summarize the process:

Step 1 - The initial request will need to come from the Dialogue Committee. This helps keep it separate from our contracting process.

Step 2 - The vendor will need to inform LMD in writing how much they need and for what purpose.

Step 3 - We will then seek EPA approval, since they have oversight for this material. EPA will be required to provide written approval.

Step 4 - The vendor will need to acquire an ATF and LSP explosive license. Step 5 - The vendor will need to provide a Safety plan that will require EPA approval. The plan needs to include as a minimum

- How the material will be handled, packaged, transported and tested.

- How they will insure the safety of any and all personnel who are handling the material during the study.

Step 6 - LDEQ requirements for 33:V.105.D.6. Treatability studies

- Vendor or test facility notifies LDEQ no less than 45 days before study commences. LDEQ may be able to expedite this.

- Vendor or test facility will need to acquire an EPA ID number.

- EPA ID number is limited to no more than 1000 kg of non-acute hazardous waste

- Copy of study must be provided to LDEQ

- Vendor must provide copy of all paperwork/shipping papers associated with the transportation of the sample materials.

- See LAC 33:V.105.D.6.g for other records that need to be maintained.

- Final disposition of any residues and unused samples

Step 7 - LMD requirements

- Transfer of ownership from LMD to vendor

- Hold harmless agreement
- Proof of liability insurance
- Copy of test results
- Certificate of destruction

And lastly, if the material has to be shipped over public roads, a stability test must be conducted and the vendor must have a U.S. DOT approved competent authority.

The Minden dialogue committee is made up of a group of individual volunteer citizens, community leaders, local and statewide organizations, scientists, elected officials and state representatives that are coming together to look at alternatives to address materials at Camp Minden in Webster Parish, Louisiana. This group, along with the public, will have the opportunity to provide individual input. The group is not convened under the Federal Advisory Committee Act (FACA) and questions should directed to Suzanne Murray, Office of Regional Counsel (214) 665-2110.