

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

AUG 2 8 2013

Ms. Maureen Sullivan, Director
Environmental Management
Office of the Assistant Deputy Under Secretary of Defense for Installations and Environment, Acquisition, Technology, and Logistics
U.S. Department of Defense
3400 Defense Pentagon, Room 5C646
Washington, DC 20301-3400

Mr. Hershell E. Wolfe
Deputy Assistant Secretary
for Environment, Safety and Occupational Health
Department of the Army
110 Army Pentagon, Room 3D453
Washington, DC 20301-0110

Dear Ms. Sullivan and Mr. Wolfe:

The purpose of this letter is to request the Department of Defense (DoD) reconsider the level and extent of participation in conducting response actions that are necessary to address explosive materials currently stored at Camp Minden, Louisiana. The explosive materials at the camp derive from the receipt, storage, handling, and demilitarizing and disposal of DoD propelling charges under contracts with the DoD.

On October 15, 2012, a magazine exploded at Camp Minden, which prompted an evacuation of Doyline, Louisiana, by the Louisiana State Police (LSP). EPA and LSP investigations conducted at the facility found over 10 million pounds of explosive materials in open areas around the property that created an imminent and substantial endangerment to public health, welfare, and the environment. Under the direction and oversight of the LSP, the improperly stored explosive materials were moved into on-site storage magazines. A total of 98 magazines at Camp Minden are filled to capacity with approximately 18 million pounds of propellant and other explosive materials. Three million pounds of propellant were also transported to another storage facility located in Arkansas.

Over the past eight months, EPA and the Louisiana National Guard have requested participation from DoD with the explosives at Camp Minden. Most recently, on August 14, 2013, EPA sent a copy of a draft Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) administrative order on consent and draft scope of work to the Army. To date, DoD has provided technical advice on how to manage this critical situation. Specifically, DoD has

sent a team from DoD's Explosive Safety Board to conduct two assessments of the potential short and long term hazards associated with the explosive materials stored at Camp Minden. Those assessments confirm the exigent circumstances requiring immediate response actions at the site.

We understand that the DoD's explosive safety experts identified materials that were immediate explosive threats and observed several deviations from standard DoD explosive safety practices. The DoD explosives safety experts indicated that the propellant stability is in question and may degrade to the point where further explosions will occur. Discussions with the DoD explosives safety experts advised treating the materials stored within the magazines within 2 years due to the current risk of explosion. Since treating the materials may take a year or longer to sufficiently address this substantial quantity of explosive material, there is an immediate need to begin response.

As stated at EPA's meeting with DoD on August 1, 2013, we believe that the Department has a cleanup responsibility. Due to the exigent nature of these unstable explosive materials, we request full reconsideration of DoD's level of engagement to immediately begin work with EPA and the State to bring the necessary capacity and expertise to safely clean up the site, and enter into an administrative order on consent.

If you have questions, please contact Reggie Cheatham at (703) 603-9089 or have your staff contact Doug Maddox at (703) 603-0087.

Sincerely,

Reggie Cheatham, Director

Federal Facilities Restoration and Reuse Office Office of Solid Waste and Emergency Response

David J. Kling, Director

Federal Facilities Enforcement Office

Office of Enforcement and Compliance Assurance

cc: Charlotte Bertrand, EPA FFRRO
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¹ Department of Army Report of Explosives Safety Assistance Visit to Louisiana National Guard's Camp Minden, 13 June 2013

Pam Philips, EPA Region 6 Susan Webster, EPA Region 6 Ragan Broyles, EPA Region 6 Paige Delgado, EPA Region 6 JC King, Army John Tesner, Army