PA Permitting Perspectives - OBOD at Letterkenny Army Depot

The National Academies of Science, Engineering, and Medicine
Committee on Alternatives for the Demilitarization of Conventional Munitions

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Southcentral Regional Office - Waste Management Program
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Tom Wolf, Governor
Patrick McDonnell, Secretary
- Develop regulations
- Technical Guidance
- Program Oversight (6 regional offices)
Bureau of Waste Management

- Hazardous Waste
- Municipal Waste
- Residual Waste
- Waste Min & Planning (Recycling)
- Reporting & Fee Collection
6 Regional Offices

Permit & Inspect Regulated Facilities

- Waste Management Program
- Air Quality Program
- Clean Water Program
- Safe Drinking Water Program
- Radiation Protection
LEAD Site Location
http://www.depgis.state.pa.us/emappa/
Pennsylvania Solid Waste Management Act comprehensively regulates solid wastes – 35 P.S. §§6018.101 – 6018.1003

- Hazardous wastes
- Residual wastes
- Municipal wastes

SWMA established in 1980

SWMA requires permits for processing, treating or disposing of wastes
1988 - Municipal Waste Regulations
1992 - Residual Waste Regulations
1999 - Hazardous Waste Regulations
  - Incorporation of Federal RCRA regulations by reference
  - Subpart X
March 4, 1996 - RCRA Part B Permit (CSAs)

2001 – LEAD Prepares to Submit amendment for OBOD

Nov 2001 – Pre-Application Public Meeting

- Apx 25 concerned citizens attended
- Many letters of concern
- Citizens Environmental Committee
Concerns:

- Physical effects of OB/OD
- Population ↑
  - 1950 – 75,927
- Proposed increase of OD limits - 500# NEW/detonation to 1500# NEW
Dust, contaminants
LEAD not responding to phone calls
LEAD not being a good steward

August 5, 2008 – OBOD Permit issued
NEW reduced back to 500# for OD
Burn Cages – flashing of items contaminated by propellant residues, explosives residues, pyrotechnic residues

Burn Pans – flashing of items contaminated by propellant residues, explosives residues, pyrotechnic residues

Thermal Battery Activation
Burn Pans – for propellants and incendiary materials. Each pan may be used no more than once/day. Each pan shall not exceed NEW of 1,000 pounds/burn

Rocket Motor Static Firing Tubes – static firing of rocket motors. Each rocket motor shall not exceed NEW 375 pounds/firing

Thermal Battery Activation
LEAD Open Detonation Long Field

- Demil high explosives, pyrotechnics, incendiaries, bombs, grenades, fuzes, conventional warheads, mines, rocket motors, rockets, demolition material and other military munitions by detonation
- Each detonation shall not exceed 500 pounds NEW/detonation
- Limited to no more than 28 detonations/day
LEAD Open Detonation Long Field
LEAD - OD Long Field
LEAD – OD Short Field
2011 – First prelim meetings held re: LEAD’s proposed Ammonium Perchlorate Rocket Motor Destruction Facility (ARMD)

Proposed confined burn chamber with emissions control to treat solid propellant rocket motors currently treated at Open Burning grounds (10 year mission to demil MLRS rocket motors/others)
ARMD Facility Permitting Timeline

- February 4, 2014 – Pre-Application Public Meeting (lightly attended)
- February 27, 2014 – LEAD submits Class 3 Permit Mod for ARMD
- December 8, 2014 – Permit issued
- November 14, 2016 - Construction Certification Submitted
- January 2017 – first firings MLRS
ARMD Facility Permit Limits

- Approved to treat solid-propellant rocket motors
- Based on largest motors to be treated, max daily amount of propellant (NEW) treated shall not exceed 32,100 pounds/day
- Maximum number of firings – no > 60/day
ARMD Facility Components

- Prep Building
- Segmentation Building (when required)
- RAMSLIC (Remote Automated Motor Sealing, Loading and Ignition Completion) Shelter
- Thermal Treatment System Chamber
- Pollution Abatement System (PAS)
- Effluent Handling System
ARMD Facility
ARMD Facility
ARMD Facility
Thermal treatment of items containing small quantities of propellants, explosives and pyrotechnics (PEP) materials such as:

- Small caliber ammunition (up to 30-mm)
- Fuzes
- Mortars
- Grenades
- Missile components (PEP)

Recycle remaining metal
LEAD Flash Furnace

- Up to 425 tons/year (< 2 tons/day)
July 25, 2017 - Pre-Application Public Meeting

July 26, 2017 – Application Received

August 7, 2017 – Admin Incomplete
  - September 8 & 21 – additional info provided

October 3, 2017 – Admin Complete & under Technical Review
LEAD – OB 1 Flash Furnace
1. Compliance Record re: Permit limits – exceedances of quantity amounts (OBOD & Alternative Tech)?

2. Does the State have any policies that support streamlined permitting processes for destruction technologies that may reduce the use of OB/OD units at Letterkenny?

3. Public Opposition to OBOD operations? Permitting of ARMD?
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