



# Army Orders Reduced Open Burning, As NAS Eyes Alternative Methods

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The Army's installations and environment office has ordered the service's commands to immediately seek to reduce the open-burning of explosives waste in the face of ongoing pressure from citizens groups to end the practice just as the National Academy of Sciences (NAS) is slated to suggest demilitarization alternatives to open burning/open detonation (OB/OD) of munitions.

The limits on OB/OD that the Army is pushing also come as the Defense Department's inspector general (DOD IG) is conducting a probe, at a congressional request, of the Defense Department's (DOD) compliance with environmental laws and policy at sites where OB/OD occurs.

In a Nov. 1 memo, Army Acting Deputy Assistant Secretary for Environment, Safety & Occupational Health John Tesner tells Army commands to immediately "[m]ake a concerted effort to reduce reliance on OB for the disposal of explosives-contaminated waste and explosives waste."

He notes an Army programming recommendation that bars OB by the end of 2024. "Even though commands have until the end of Fiscal Year 2024 to procure closed-disposal technology, which will support the command's operational requirements, doing so as soon as possible is encouraged." He adds that many closed-disposal treatment technologies will require environmental permits.

The Army memo also orders commands to terminate the open-burning of waste, such as building debris, that could not possibly harbor residues containing explosives in sufficient amounts to pose an explosive hazard.

The action comes as the NAS is slated to release a report in early December on replacement destruction technologies to OB/OD and the challenges that may accompany those alternatives.

A national coalition of 60 environmental, citizens and environmental justice groups has been pushing a campaign to end OB/OD of military munitions, urging EPA to require the use of alternative destruction technologies after seeing success in getting the agency to allow alternative methods at a Louisiana site.

The campaign -- dubbed the Cease Fire Campaign -- argues that EPA should end reliance on a 1980 regulatory exclusion that allows for OB/OD of explosives waste, which is defined as waste that could detonate or military propellants that cannot safely be disposed of through other treatment methods.

The coalition says that the exclusion for munitions lacks relevancy, as a number of technologies other than OB/OD have been certified by the DOD's Explosives Safety Board for safely destroying explosives that are hazardous waste.

EPA more than two years ago signaled it was examining the issue, including the resulting contamination and difficulties in cleanup of OB/OD of explosives, but has not publicly announced any change in policy.

In a Nov. 26 press release anticipating the release of the NAS report, a Wisconsin citizens group and other members of Cease Fire point out that the munitions industry remains the only industry still allowed to burn hazardous waste to the open air, a practice it says Congress banned in the 1980s.

EPA “has allowed the practice to continue for decades, despite the long-standing federal mandate,” the groups say. They note air pollutants released by OB/OD, including Royal Demolition Explosive (RDX) and 2,4,6-trinitrotoluene (TNT) -- listed by EPA as probable human carcinogens -- lead, arsenic and mercury, as well as endocrine disruptors such as dioxins.

## NAS Study

An NAS study committee is set to release a report next week on alternatives for demilitarizing conventional munitions, discussing key findings and recommendations on a Dec. 6 webinar.

The study was required by legislation spearheaded by Sen. Tammy Baldwin (D-WI), calling in part for an analysis of disposal, treatment and reuse technologies, including comparing cost, throughput capacity, personnel safety and environmental impacts, according to the legislation. The study will include a look at challenges to implementing alternative destruction technologies.

Meanwhile, the DOD IG is in the midst of evaluating the department's compliance with environmental laws in its OB/OD of munitions. The Cease Fire groups say the IG's report is expected in April and that the IG office has already conducted site visits at 14 Army, Navy and Air Force facilities.

In an Aug. 10 memo, the IG's office says its “objective is to evaluate DoD compliance with relevant environmental and related laws, inter-agency and municipal agreements, and policy at sites where DoD conducts or conducted open burning of excess conventional ammunition and explosives at locations in the United States and its Territories.” The probe will also look at DOD oversight of contractors performing open burning.

The IG's investigation is being conducted at certain active DOD ammunition plants or other OB/OD locations, it says. The examination also includes collecting data about inactive sites where OB/OD took place, it says.

The Cease Fire coalition says alternative destruction technologies that have been deployed in the past include supercritical water oxidation, use of a controlled detonation chamber and a static detonation chamber, detonation in a vacuum assisted chamber, hydrolysis, gas phase chemical reduction and use of a contained burn chamber.

-- Suzanne Yohannan (syohannan@iwpnews.com)