

## NAS backs alternatives to munitions OB/OD

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A National Academies of Sciences (NAS) panel is urging the Defense Department (DOD) to develop a plan to shift from open burning/open detonation (OB/OD) of conventional munitions to cleaner alternatives, but the panel also notes that EPA and state regulators have not adopted policies signaling a preference for such alternative technologies.

The NAS committee, in a Dec. 6 report, also cautions that such a shift by the military will be "impossible" unless the Army has a clear directive for making the change and Congress provides sufficient, stable funding.

"Complicating any push to fund replacement of [OB/OD] with alternative technologies is the fact that EPA and the states maintain that permitted operations are safe for human health and the environment," the committee's chair, Todd Kimmell, notes in a Dec. 6 press release.

Specifically, the report, "Alternatives for the Demilitarization of Conventional Munitions," says, "While regulators' perceptions of OB/OD and alternative technologies appear to be evolving, there are no federal written policies or [Resource Conservation & Recovery Act (RCRA)] regulations stating such a preference."

In addition, OB/OD continues to be permitted under RCRA.

A coalition of environmental and citizen groups has been pushing for an end to OB/OD of military munitions, arguing 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 by other methods.

EPA more than two years ago indicated 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.

But NAS says it was briefed on a recently initiated EPA project, which "apparently will assess technologies and streamlining procedures and permitting." The project "will document the existence of alternative technologies and provide information on feasibility, cost, and cost-effectiveness of these alternatives." the report says.

And the Army in early November signaled **some movement** on shifting from OB/OD to alternatives, with its installations and environment office ordering 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.

In the report, NAS generally finds that most alternatives to OB/OD for disposing of conventional munitions are "mature," many are permitted, and all of those assessed have lower environmental releases than OB/OD.

The congressionally-mandated report came at the conclusion of an 18-month study examining DOD's conventional munitions demilitarization program.

Alternative destruction methods mainly consist of contained burning (CB) or contained detonation (CD).

The military has an inventory of about 400,000 tons of excess, obsolete, or unserviceable conventional munitions set for demilitarization, with the services adding about 60,000 tons per year to the stockpile, according to the panel. These include projectiles, bombs, rockets, landmines and missions, it says.

"The primary downside of most of the available CB/CD technologies is cost and throughput," the report says. It also notes that due to additional handling, risks to workers are greater for alternatives, as compared to OB/OD. In addition, OB/OD would continue to be needed for disposing of unstable munitions.

"It definitely costs more" to use alternative technologies, Douglas Medville, vice chair of the committee that produced the report, said during a Dec. 6 NAS webcast reviewing the panel's findings. He said the cost is higher due to the complexity of munitions. The cost to use alternative destruction methods is three to five times higher, he said. These are due to greater capital and operating costs, although alternatives do have lower closure costs.

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