

**BEFORE THE ENVIRONMENTAL QUALITY COMMISSION  
OF THE STATE OF OREGON**

In the Matter of	)	Final Order Allowing
Umatilla Chemical Demilitarization	)	Offsite Shipment of
Facility Hazardous Waste	)	Agent-Contaminated Waste
Permit No. ORQ 000 009 431-01	)	to a Commercial Treatment, Storage and Disposal Facility

1. This matter came before the Environmental Quality Commission on Oct. 25, 2012.
2. In an Order dated Feb. 7, 1997, EQC required the Oregon Department of Environmental Quality to place conditions II.B.2 and II.B.3 in the original hazardous waste permit (Permit No. ORQ 000 009 431) for the Umatilla Chemical Demilitarization Facility (UMCDF) that restricted UMCDF from sending any material or waste off site that has detectable amounts of GB, VX, or HD and to process all chemical agent contaminated materials at the Umatilla Chemical Depot.
3. At the time the 1997 Order was issued, no safe levels for chemical agents had been determined, and EQC found, pursuant to ORS 466.055(5) and 466.150(8), that permit conditions II.B.2 and II.B.3 were necessary to ensure that the proposed facility would not have any major adverse effect on public health and safety, or on the environment of adjacent land.
4. Since the time the 1997 Order was issued, the Centers for Disease Control has established by regulation standards for GB, VX, and HD for workplace exposure. They established these standards at the direction of Congress.
5. Since the time the 1997 Order was issued, the National Research Council has recommended that chemical demilitarization facilities pursue the off-site treatment of secondary wastes at commercially available incinerators when the transportation of these wastes can be performed safely.

6. On April 12, 2012, UMCDF submitted a permit modification request to allow the off-site shipment of agent contaminated secondary wastes. This request proposed changes to permit conditions II.B.2 and II.B.3.
7. In the permit modification request, UMCDF provided two site specific risk assessments performed for UMCDF by the Confederated Tribes of the Umatilla Indian Reservation. These risk assessments showed that nonporous secondary wastes and agent contaminated spent carbon generated at UMCDF can be shipped to a commercial incineration facility with low risk to human health and the environment.
8. An initial public comment period on the permit modification request occurred from April 12, 2012, until June 11, 2012. Based on comments received, DEQ requested additional information from UMCDF.
9. On July 31, 2012, UMCDF submitted an addendum to the permit modification request containing the information requested by DEQ, including an additional site specific risk assessment for multi-agent contaminated spent carbon. Based on the public comments and the additional information from UMCDF, DEQ made significant changes to the new section of the Waste Analysis Plan proposed in the permit modification request to ensure off-site shipping occurred within the parameters used for the site specific risk assessments.
10. DEQ issued a tentative final decision on Aug. 6, 2012. A public comment period was open from Aug. 6, 2012 until Sept. 20, 2012, and a public hearing was held in Hermiston on Sept. 5, 2012. DEQ also issued a response to comments received during the initial comment period.
11. DEQ made minor changes to the permit language and prepared a response to the comments received during the last comment period, as shown in DEQ's staff report dated Oct. 18, 2012.

The Oregon Environmental Quality Commission therefore finds:

1. Modifying permit conditions II.B.2 and II.B.3, as stated in DEQ's staff report, agenda item B, dated Oct. 18, 2012, will not have any major adverse effect on public health and safety, or on the environment of adjacent land.
2. Conditions II.B.2 and II.B.3 of the hazardous waste permit ORQ 000 009 431-01 may be modified to read as follows:

- II.B.2. Any chemical agent-related material and/or demilitarization waste being transferred to an off-site RCRA Subtitle C permitted hazardous waste treatment or disposal facility (or RCRA Subtitle C permitted smelting facility in the case of munition casings) must comply with Attachment 2 of this permit and all applicable State and Federal regulations.
  - II.B.3. Except when shipped off-site in accordance with Permit Condition II.B.2., the permittee shall process, in accordance with this permit, all chemical agents, and chemical agent-contaminated materials currently stored or otherwise located at the Umatilla Chemical Depot.
3. The hazardous waste permit ORQ 000 009 431-01 may be modified as described in the Oct. 18, 2012, staff report to support the modifications to these permit conditions.

Dated this \_\_\_\_ day of October, 2012.

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William Blosser, Chair  
Oregon Environmental Quality Commission  
On behalf of the  
Oregon Environmental Quality Commission

agent or munitions containing chemical agents shall be limited to those identified as being within the UMCD stockpile as of February 12, 1997. [OAR 340-105-0041]

II.B.2. Any chemical agent-related material and/or demilitarization waste being transferred to an off-site RCRA Subtitle C permitted hazardous waste treatment or disposal facility (or RCRA Subtitle C permitted smelting facility in the case of munition casings) must comply with meet the agent-free criteria in Attachment 2 of this permit and all applicable State and Federal regulations.

II.B.3. Except when shipped off-site in accordance with Permit Condition II.B.2, the permittee shall process, in accordance with this permit, all chemical agents, and chemical agent-contaminated materials currently stored or otherwise located at the Umatilla Chemical Depot.

II.B.4. Except when shipped offsite in accordance with Permit Condition II.B.5, the permittees shall process all UMCD pollution abatement system brines generated from the treatment of chemical agent, or chemical agent-contaminated materials, in the Brine Reduction Area in accordance with Module V of this permit.

II.B.S. The permittee may ship pollution abatement system brines to an off-site RCRA Subtitle C permitted hazardous waste management facility when:

- i. The pollution abatement system brines have been determined to meet the agent-free criteria as defined in the Waste Analysis Plan (Attachment 2), and
- ii. If brines are transferred directly from the pollution abatement system to an off-site shipment tanker truck or any other means of off-site shipment, it shall be done inside the UMCD double fence, sampled in accordance with the Waste Analysis Plan (Attachment 2), and verified agent free before exiting the UMCD double fence.

II.C. **GENERAL WASTE ANALYSIS**

II.C.1. The permittee shall comply with all requirements in accordance with 40 CFR §264.13 and shall follow the Waste Analysis Plan procedures and methods-(Attachment 2 to this permit).



## 12. Off-site Shipping Criteria

In accordance with Permit Condition II.B.2., secondary waste containers meeting the Headspace Monitoring Criteria (HMC) may be shipped off-site. Wastes shipped off-site must be sent for incineration at a facility permitted pursuant to subpart O of RCRA subtitle C when the wastes meet all of the criteria of this section.

Matrix Type	Waste Streams	GB HMC <sup>1</sup> mg/m <sup>3</sup> (VSL)	VX HMC <sup>1</sup> mg/m <sup>3</sup> (VSL)	HD HMC <sup>1</sup> mg/m <sup>3</sup> (VSL)
Secondary wastes	All non-liquid non-porous secondary wastes	0.05 (500)	N/A <sup>2</sup>	0.35 (117)
Secondary wastes	Spent carbon <sup>3</sup>	0.039 (390)	0.00033 (33)	0.35 (117)

Footnotes:

- 1 Values in this column reflect the maximum allowable concentration of agent inside of each the container.
- 2 Non-liquid secondary wastes (except spent carbon) exposed to VX are not included in the provisions of this section.
- 3 Headspace analysis will not be used to characterize spent carbon. Characterization of spent carbon will require extractive analysis using SOP UM-0000-M-559.

Headspace monitoring will be performed in accordance with UMCDF SOP UM-0000-M-095, and UMCDF SOP UM-0000-M-600, "ACAMS Operations", UM-0000-M-556, "DAAMS GC/FPD Analysis" or UM-0000-M-557, "DAAMS GC-MSD/FPD Analysis."

The provisions of this section do not apply to wastes that contain occluded spaces or free liquids.

Prior to each shipment made under the provisions of this section, the permittees will submit a report, subject to permit condition I.X., that arrangements are in place to ensure:

- There will be two drivers per vehicle and both drivers will be trained in hazardous waste operations and emergency response with agent-specific training;
- All vehicles used to ship wastes will utilize climate controlled cargo enclosures to maintain temperature at or below 70°F for the duration of transportation;
- The shipment will employ a multiple vehicle caravan;
- Emergency response teams are established along the transportation route;
- Cargo enclosures will be monitored for agents prior to opening; and
- Waste drums will be fed unopened and immediately directly to the incinerator upon receipt.

The amount of spent carbon on one transport vehicle will be limited to:

Waste Stream	GB (grams)	VX (grams)	HD (grams)
Total agent on transport vehicle	0.41	15	87

The provisions of this section do not apply to wastes that have met the agent-free criteria in Section 8. of this Waste Analysis Plan.

**UMATILLA CHEMICAL AGENT DISPOSAL FACILITY  
(UMCDF)**

**STANDING OPERATING PROCEDURE FOR:  
  
WASTE MANAGEMENT HEADSPACE MONITORING**

**SOP NO: UM-0000-M-095**

Revision 0, Draft

Change 0, Draft

Biennial Review Due:
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**OPERATION: WASTE MANAGEMENT  
ORGANIZATION: WDC (OPS SUPPORT)**

**QA Class I**

**Authority:** DAAA09-97-C-0025

**Date:** 02/10/1997

## INDEX OF OPERATIONS

1	PRE-OPERATIONAL SETUP.....	5
2	HEADSPACE MONITORING .....	6
	APPENDIX A – WASTE MANAGEMENT HEADSPACE MONITORING RECORD .....	A-1
	APPENDIX B – OFFSITE SHIPPING CRITERIA .....	B-1

## REMARKS:

The purpose of this Standing Operating Procedure (SOP) is to outline the necessary air monitoring steps to determine the agent quantity on secondary hazardous waste for the purpose of offsite disposal in accordance with the Bounding Transportation Risk Assessment and Waste Analysis Plan (WAP). This procedure is not to be used to perform any Unventilated Monitoring Tests (UMT).

All records generated by this procedure will be handled IAW UM-DC-004, Records Management and will be incorporated into waste container packages that will be retained in 2-hour fire-rated file cabinets by Operations Waste Management (OWM). Upon waste disposal, the record package will be transmitted to the Data Control Center (DCC) per UM-OS-007 and IAW UM-DC-004. The following is a record:

APPENDIX and FORM NAME	FORM #	PAGE #
Appendix A – Waste Management Headspace Monitoring Record	F-SOP-M-095.01	A-1

## RECORD OF REVISIONS

Change/Rev No.	Affected Pages	Date	Description
Rev 0	All		Initial Issue: Created to add procedure to Hazardous Waste Permit IAW PMR-12-010-WAST(3) Shipment of Agent Contaminated Waste

## REFERENCES:

- 29 Code of Federal Regulations (CFR) 1910, Occupational Safety and Health Standards
- 40 CFR 260 – 280, Resource Conservation and Recovery Act (RCRA)
- Army Regulation (AR) 200-1, Environmental Protection and Enhancement
- AR 385-10, Army Safety Program
- AR 385-61, Army Chemical Agent Safety Program
- Department of the Army Pamphlet (DA PAM) 385-10, Army Safety Program
- ORQ 000 009 431-01, UMCDF Permit for the Storage and Treatment of Hazardous Waste, Attachment 2, Waste Analysis Plan
- UM-0000-M-038, Life Support System
- UM-0000-M-048, MDB Heating, Ventilation, and Cooling
- UM-0000-M-061, DPE Support Area (DSA) Operations
- UM-0000-M-062, DPE Entry

- UM-0000-M-092, MDB Secondary Hazardous Waste and Material Management
- UM-0000-M-113, MDB Entry
- UM-0000-M-125, Protective Clothing & Equipment Operations
- UM-0000-M-600, ACAMS Operations
- UM-CC-008, Standing Operating Procedures Development and Control (Contract Data Requirements List [CDRL] A051)
- UM-DC-004, Records Management
- UM-EC-021, Hazardous Waste/Materials Management Procedures (CDRL A045)
- UM-IH-011, Toxic Chemical Agent Safety Program
- UM-OS-002, Waste Management
- UM-OS-007, UMCDF Permitted Storage
- UM-OS-009, Operations Waste Management Hazardous Waste Shipping Procedures
- UM-PA-002, Loss, Damage, or Destruction (LDD), of Government Property
- UM-PL-019, Environmental Compliance Plan (CDRL A015)
- UM-PL-022, Participant Quality Assurance Plan (PQAP) (CDRL A022)
- UM-PL-108, Decommissioning Plan (CDRL A028A)
- UM-PL-114, Facility Disposition Plan
- UM-SA-006, Pre-Job Safety Planning
- UM-SA-012, Personal Protection
- UM-SA-017, Electrical Safety
- UMCDF Facility Assessment

## DRAWINGS

None

SOP TITLE: Waste Management Headspace Monitoring

Operation  
Number/Title: **OPERATION 1 PRE-OPERATIONAL SETUP**

Location: CON, MDB

Explosive Limits: Units: N/A Explosive Lbs.: N/A

Personnel Limits: Operators: N/A Transients: N/A

### **NOTES**

- This procedure is not to be used to perform any unventilated monitoring tests.
- This procedure is for monitoring non-porous items only.

### **SPECIFIC INSTRUCTIONS**

1. **CONFIRM** with supervision that the following systems are available to perform this SOP:
  - UM-0000-M-038, Life Support System
  - UM-0000-M-048, MDB Heating, Ventilation, and Cooling
  - UM-0000-M-061, DPE Support Area (DSA) Operations
  - UM-0000-M-062, DPE Entry

### **SPECIAL REQUIREMENTS:**

- 1) Toxic Area Entry Permit or DPE Toxic Area Entry Permit required for entry during this SOP.

### **EQUIPMENT, TOOLS, GAUGES, AND SUPPLIES:**

ITEM

QUANTITY REQUIRED

None

SOP TITLE: Waste Management Headspace Monitoring

Operation  
Number/Title: **OPERATION 2 HEADSPACE MONITORING**

Location: CON, MDB

Explosive Limits: Units: N/A Explosive Lbs.: N/A

Personnel Limits: Operators: N/A Transients: N/A

## WARNING

### HAZARDOUS MATERIAL – POTENTIAL AGENT EXPOSURE:

- **BASED ON AGENT AREA MONITORING AND REAL TIME CONDITIONS, PERSONNEL SHALL FOLLOW REQUIREMENTS OF THE TOXIC AREA ENTRY PERMIT IAW UM-0000-M-113, MDB ENTRY, OR FOR DPE ENTRIES, REFER TO UM-0000-M-062, DPE ENTRY.**

## SPECIFIC INSTRUCTIONS

1. IF performing headspace monitoring on non-porous materials to meet the agent free criteria in the WAP, THEN **PERFORM** headspace monitoring and **EVALUATE** the results IAW UM-0000-M-092.
2. **VERIFY** the waste in the container is non-porous or spent carbon.

## NOTE

**Tents used for headspace monitoring may not exceed 20m<sup>3</sup> (approx. 23' x 10' x 3') in size.**

3. **TENT** open waste containers to be headspace monitored.
4. **INSERT** temperature device inside the tented space.

## NOTES

- **If initial temperature is less than 70 °F, use of supplemental heating may be installed to achieve desired temperature.**
- **Tented spaces will be held for a minimum of 4 hours prior to monitoring.**

5. **RECORD** 4-hour aeration start and stop time.
6. PRIOR to performing air monitoring, **CONFIRM** temperature is greater than 70 °F.
7. **DOCUMENT** the interior temperature of tent on Appendix A – Waste Management Headspace Monitoring Record.



### **NOTE**

**All waste to be headspace monitored for offsite shipment shall be monitored for GB, VX, and HD.**

8. **PERFORM** flow check of ACAMS wand before monitoring after hold time has been met.
9. **PERFORM** ACAMS monitoring after hold time has been met.
  - 9.1. **INSERT** GB, VX, and HD monitoring wand into tent directly over waste or container opening.
10. **DOCUMENT** ACAMS results on Appendix A – Waste Management Headspace Monitoring Record.
11. IF readings exceed 390 VSL for GB, 50 VSL for VX, or 117 VSL for HD, **THEN CONTACT** OWM Supervisor for further direction.
12. IF readings are greater than agent free criteria outlined in the WAP **AND** below 390 VSL for GB, 50 VSL for VX, and 117 VSL for HD, **THEN REMOVE** tent and **SECURE** container lids.
13. **MONITOR** outside of containers IAW Step 15, Operation 5, of UM-0000-M-092 and **PREPARE** the container for offsite shipment IAW Appendix B – Offsite Shipping Criteria.
14. **COMPLETE** signatures on Appendix A – Waste Management Headspace Monitoring Record, and **PLACE** completed form in container file.

### **SPECIAL REQUIREMENTS:**

- 1) See the Remarks section on page 3 for disposition of records completed during this operation.
- 2) Toxic Area Entry Permit or DPE Toxic Area Entry Permit required for entry during this operation.

### **EQUIPMENT, TOOLS, GAUGES, AND SUPPLIES:**

<u>ITEM</u>	<u>QUANTITY REQUIRED</u>
Toxic Area Entry Permit	1
PPE	As required by Toxic Area Entry Permit
Certification of Headspace Monitoring (F-PL-116.01)	As required
Shipping containers	As required

## APPENDIX A – WASTE MANAGEMENT HEADSPACE MONITORING RECORD

HEADSPACE MONITORING DATA RECORD			
Package Identification Number: _____			
Tents must be held for a minimum of 4-hours prior to monitoring - record hold times below:			
Aeration Start Time: _____	Aeration End Time: _____		
Interior temperature of tent must be greater than 70 °F prior to monitoring:			
Verified by: _____			
<i>If the temperature becomes less than 70 °F, pause. Once temperature is above 70 °F start test over again.</i>			
ACAM # GB _____	ACAM # VX _____	ACAM # HD _____	
ACAM verified On-Line: <input type="checkbox"/> YES <input type="checkbox"/> NO		<b><i>If no, do not attempt monitoring until verified as On-Line.</i></b>	
ACAM reading after required hold period:	GB: _____ VSL	VX: _____ VSL	HD: _____ VSL
Initials of person completing monitoring: _____		Date: _____	
Comments/Notes:			

ACAM Operator:

Print name	Signature	Date
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OWM Supervisor or Delegate:

Print name	Signature	Date
------------	-----------	------

## APPENDIX B – OFFSITE SHIPPING CRITERIA

In accordance with Permit Condition II.B.2., secondary waste containers meeting the Headspace Monitoring Criteria (HMC) may be shipped off-site for incineration at a facility permitted pursuant to subpart O of RCRA subtitle C when the wastes meet all of the criteria of this section.

Matrix Type	Waste Streams	GB HMC <sup>1</sup> mg/m <sup>3</sup> (VSL)	VX HMC <sup>1</sup> mg/m <sup>3</sup> (VSL)	HD HMC <sup>1</sup> mg/m <sup>3</sup> (VSL)
Secondary Wastes	All non-liquid secondary wastes (except spent carbon)	0.05 (500)	N/A <sup>2</sup>	0.35 (117)
Secondary Wastes	Spent carbon <sup>3</sup>	0.039 (390)	0.0005 (50)	0.35 (117)

Footnotes:

1. Values in this column reflect the concentration of agent inside of the container.
2. Non-liquid secondary wastes (except spent carbon) exposed to VX are not included in the provisions of this section.
3. Concentration of agent is determined by extractive analysis.

Headspace monitoring will be performed in accordance with UMCDF SOP UM-0000-M-095, and UMCDF SOP UM-0000-M-556, "DAAMS GC/FPD Analysis" or UM-0000-M-557, "DAAMS GC-MSD/FPD Analysis."

The provisions of this section do not apply to wastes that contain occluded spaces or free liquids.

Prior to each shipment made under the provisions of this section, the permittees will submit a report, subject to permit condition I.X., that arrangements are in place to ensure:

- There will be two drivers per vehicle and both drivers will be trained in hazardous waste operations and emergency response with agent-specific training;
- All vehicles used to ship wastes will utilize climate controlled cargo enclosures;
- The shipment will employ a multiple vehicle caravan;
- Emergency response teams are established along the transportation route;
- Cargo enclosures will be monitored for agents prior to opening; and
- Waste drums will be fed unopened and directly to the incinerator upon receipt.

The amount of spent carbon on one transport vehicle will be limited to:

Waste Stream	GB (grams)	VX (grams)	HD (grams)
Total agent on transport vehicle	0.41	15	87

## AUTHORIZATION AND ISSUE

Title	Signature	Date
<u>Technical Authority</u>	<u></u>	<u></u>
<u>Operations Support Manager</u>	<u></u>	<u></u>
<u>Operations Manager</u>	<u></u>	<u></u>
<u>Systems Engineering Manager</u>	<u></u>	<u></u>
<u>Environmental Manager</u>	<u></u>	<u></u>
<u>QA/QC Manager</u>	<u></u>	<u></u>
<u>Safety Manager</u>	<u></u>	<u></u>
<u>Plant Manager</u>	<u></u>	<u></u>

**TABLE 3-3 MAXIMUM ALLOWABLE SECONDARY WASTES IN THE MDB**

Waste	MDB Area <sup>a, b</sup>		
	Maximum Allowable Secondary Waste Storage		
	TMA "A/B" Decon Area <sup>c</sup>	TMA "A" Area	TMA "C" Area <sup>d</sup>
Secondary Waste	440 gal	660 gal	1,980 gal

Footnotes:

<sup>a</sup> Exact locations for permitted secondary waste storage is clearly marked to differentiate permitted storage from 90-day storage.

<sup>b</sup> ~~RESERVED~~

<sup>c</sup> ~~Permitted storage limited to containers being staged for loading of their contents into waste incineration containers.~~

<sup>d</sup> ~~Permitted storage limited to containers being transferred from J-Block back to the UMCDF.~~

Abbreviations:

MDB Munitions Demilitarization Building  
TMA Toxic Maintenance Area

# Response to Comments



State of Oregon  
Department of  
Environmental  
Quality

## Land Quality Division

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## Umatilla Chemical Agent Disposal Facility Class 3 Permit Modification Request, Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage and Disposal Facility

**WHAT WAS DECIDED?** On Aug. 6, 2012, the Oregon Department of Environmental Quality issued a tentative decision on the above-referenced permit modification request.

**PUBLIC COMMENTS:** The initial public comment period for this permit modification request was open from April 12, 2012, to June 11, 2012. DEQ received four sets of comments during the public comment period. This “Response to Comments” has been prepared in accordance with the requirements of the Resource Conservation and Recovery Act regulations (40 CFR 124.17, as adopted by OAR 340-100-0002).

### List of Commenters

Environmental Protection Agency, Region 10 (EPA)

Confederated Tribes of the Umatilla Indian Reservation (CTUIR)

Umatilla County (Umat Cty)

Kelly Hodney (Hodney)

**WHERE CAN I GET MORE INFORMATION?** A copy of this Response to Comments has been provided to each party who provided comment during the public comment period. A copy of the current chance to comment document with links to the current proposed revisions to the permit is located at the following link:  
[http://www.deq.state.or.us/news/publicnotices/uploaded/120806\\_1941\\_SecWastePubNot.pdf](http://www.deq.state.or.us/news/publicnotices/uploaded/120806_1941_SecWastePubNot.pdf)

**ACCESSIBILITY INFORMATION:** DEQ is committed to accommodating people with disabilities. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille, or another format. To make these arrangements, contact DEQ Communications & Outreach at (503) 229-5696 or toll-free in Oregon at (800) 452-4011; fax to (503) 229-6762; or email to [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us). People with hearing impairments may call 711.

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## RESPONSE TO COMMENTS

Related to

Umatilla Chemical Agent Disposal Facility Class 3 Permit Modification Request, Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage and Disposal Facility

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
RTC-1	<p>The permit modification must clearly require the Permittee to treat the agent-contaminated waste in a RCRA permitted incinerator. Other disposal options, such as land disposal, are not consistent with the Center for Disease Control's (CDC's) recommendations. (EPA)</p> <p>Appendix K, Proposed permit language, condition II.B.2. This revision must state that agent-contaminated material, if shipped off-site, will be treated in a RCRA permitted TSDF incinerator. (EPA)</p> <p>(10) Appendix L, Proposed changes to the WAP, additional text added under item 12, page 28 of 68. The first paragraph must clearly state that the agent-contaminated material going off-site must go to a RCRA permitted TSDF incinerator....(EPA)</p> <p>(16) Appendix L, proposed changes to the WAP, sixth paragraph, page 29 of 68. This statement must clarify that the agent-contaminated waste must go to a RCRA permitted TSDF incinerator for treatment, not to a Subtitle C facility for disposal. (EPA)</p> <p>PMR Appendix L, WAP Change Pages, Section 12, 1<sup>st</sup> and 7<sup>th</sup> paragraphs. As written, this paragraph implies, and paragraph explicitly states, agent-contaminated wastes may be shipped to a RCRA Subtitle C disposal facility. This is not supported by the NRC, CDC, nor the TRAs. Please revise to specify a RCRA Subtitle C incinerator treatment facility. (Hodney)</p>	<p>DEQ agrees with these comments. Section 12 of the WAP has been modified to clearly state that the waste shipped off-site must go to a RCRA TSDF permitted as an incinerator.</p>



Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
RTC-2	<p>Item 5(a) requires head space monitoring at a specific temperature and duration. The standard operating procedure (SOP) for the headspace monitoring must be included and provided to CDC for review and acceptance. The size and arrangement of containers must be included and consistent with the assumptions used in BTRA. (EPA)</p> <p>Appendix L, proposed changes to the WAP, seventh paragraph, page 29 of 68. The SOP for collecting a headspace sample must be included in the permit modification. (EPA)</p> <p>Please add a tested and proven headspace monitoring procedure to this PMR for the public to review. (CTUIR)</p> <p>What sampling/analytical method and sampling frequency will be used for the verification of agent concentrations with each waste container? Provide further clarification regarding verification of agent concentrations within waste containers allowed to be shipped off-site. (Umat Cty)</p> <p>This PMR is still incomplete and deficient in that the UMCDF has not incorporated the specific headspace sampling requirements/procedures into the permit. (Hodney)</p> <p>In accordance with OAR 340-100-0021, Please require the UMCDF to provide the new sampling method-the headspace sampling procedure- for DEQ and public review. Please also provide the CDC's review and evaluation of the adequacy of the proposed headspace sampling procedure as required by the Permit Condition II.E.5 Independent Oversight Program. (Hodney)</p>	<p>DEQ agrees. In the supplemental information, DEQ received a standard operating procedure for headspace monitoring of each individual container before shipment. The use of this SOP is included in the requirements of Section 12.</p>
RTC-3	<p>The permit modification request does not address all aspects of the 2008 memorandum from the U.S. Army's Chemical Materials Agency's (CMA's) former director, Conrad Whyne, included as appendix C to the permit modification request. (EPA)</p>	<p>The Bounding Transportation Risk Assessment prepared by the Chemical Materials Agency, based on recommendations from the National Research Council, to provide a framework for safely shipping agent-contaminated wastes to a commercial hazardous waste treatment facility without the necessity of performing site specific risk assessments based on specific</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	<p>Item 2 of the 2008 memorandum states that shipment of waste from a CMA facility to a RCRA permitted TSDF incinerator must be done in accordance with the seven documents referenced in item 1 of the memorandum. The permit modification must be revised to include the references in item 1 and identify how the referenced requirements will be met. (EPA)</p> <p>The PMR is still incomplete. As noted in the DEQ's draft NOD on PMR 11-002, the CDC's review of the Bounding TRA predates the version of the Bounding TRA submitted in this PMR. (Hodney)</p> <p>The PMR is still incomplete. The CDC review of the carbon addendum still was not provided. (Hodney)</p> <p>The Army CMA has determined that additional conditions beyond those described in the BTRA and carbon addendum are necessary prior to shipping greater than 1 VSL agent-contaminated waste when using the BTRA in lieu of a site-specific TRA, which is what PMR 12-010 proposes. (Hodney)</p> <p>The UMCDF has acknowledged and accepted the validity of the CTUIR's TRA's in this PMR. The CTUIR conditioned its TRA on certain requirements being met for each shipment and containers. (Hodney)</p> <p>The NRC's recommendations were conditioned on following the ABCDF and ANCDF restrictions. Please require the UMCDF to revise the WAP to include all the NRC/ABCDF/ANCDF off-facility shipping requirements. (Hodney)</p>	<p>waste profiles.</p> <p>In this permit modification request, UMCDF has presented site specific risk assessments for specific wastes that show low risk to human health and the environment when performed within the parameters and restrictions used in developing these assessments.</p> <p>The parameters and restriction from the site specific risk assessments have been incorporated into the requirements of Section 12 of the Waste Analysis Plan based on the omnibus permitting authority that allows the Department to add permit conditions that it can demonstrate are necessary to protect human health and the environment.</p> <p>DEQ cannot make the demonstration of necessity required by the omnibus authority for additional conditions and requirements from the Bounding Transportation Risk Assessment and National Research Council since the site specific risk assessments indicated that the proposed shipments present low risk without them.</p>
RTC-4	<p>Because this is the first "stockpile" site in the US proposing to ship this volume of agent-contaminated waste with concentrations at these high levels (0.5 immediately dangerous to life and health (IDLH) and greater than 500 VSL), it is critical that emergency response systems, all of</p>	<p>UMCDF is not the first "stockpile" site to propose off-site shipment of agent-contaminated waste.</p> <p>DEQ agrees that UMCDF must perform the necessary activities to maintain</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	the safeguards identified by the CDC, and protective permit conditions with appropriate procedures are in place at the receiving RCRA treatment, storage and disposal facility (TSDF) before DEQ allows the waste to be shipped. (EPA)	low risk to human health and the environment.
RTC-5	<p>The specific permit modification language provided in Appendices J, K, and L of the modification request is incomplete, unclear, and/or unsupported. (EPA)</p> <p>Appendix J, item 4. Agent-contaminated material, if shipped off-site must go to a RCRA permitted TSDF incinerator. Revise the proposed permit condition. (EPA)</p> <p>Appendix L, proposed changes to the WAP, first paragraph, page 29 of 68. It is unclear what is meant by this paragraph, beginning “samples will be considered compliant if they are below the..”. Revise or remove this paragraph. (EPA)</p> <p>Appendix L, proposed changes to the WAP, second paragraph, page 29 of 68. It is not clear how extractive analysis will be conducted. A specific reference to the sampling method and analysis must be included. It is not clear how process knowledge can be used to demonstrate a specific analytical level. Please explain. What is the basis for these proposed concentrations? The concentrations do not appear to be protective. Revise this section of the WAP. (EPA) (Hodney)</p> <p>Appendix L, proposed changes to the WAP, third paragraph, page 29 of 68. The containers that waste will be shipped in should be specified as well as the total time the headspace monitoring will be conducted. It is not clear how these headspace concentrations compare to the 0.5 IDLH headspace limit. (EPA) (Hodney)</p> <p>Appendix L, proposed changes to the WAP, fourth paragraph, page 29 of 68. The paragraph beginning, “After agent decontamination, sampling..” appears to be out of</p>	<p>DEQ agrees that Section 12, as proposed, was not as clear as it should be and contained some conditions better suited for Section 8.</p> <p>Section 12 has been reworked to include specific compliance points for agent-contaminated wastes to be shipped off-site, including separate standards for non-porous wastes and spent carbon.</p> <p>Conditions have also been added to reflect the parameters and restrictions used in developing the site specific risk assessments that demonstrate the wastes can be shipped at low risk.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	<p>place. Remove or provide additional clarification. (EPA) (Hodney)</p> <p>Appendix L, proposed changes to the WAP, fifth paragraph, page 29 of 68. It is unclear what is meant by the statement concerning maintaining the furnace at a temperature of at least 1000 degrees F for a minimum of 15 minutes after the last waste feed. (EPA)</p> <p>Appendix J, page J-2, change item 6: "New text has been added to the WAP to instill primary requirements of the bounding TRA and the carbon addendum." Please provide a rationale for each new item added to Section 12 of the WAP (CTUIR)</p> <p>Appendix L, Proposed Change Pages for Permit, WAP, Section 12, page 28 of 68. Please remove the language "Regardless of requirements elsewhere in this document, as allowed by Permit Condition II.B.2." (CTUIR) (Hodney)</p> <p>Appendix L, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, test stating: "Samples will be considered compliant if they are below the extractive analysis or headspace monitoring criteria identified in this section." Please specify what compliance requirement is being referred to. (CTUIR)</p> <p>Appendix L, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, test stating: "Process knowledge or generator knowledge (e.g. no exposure in an agent environment, maintaining the furnace at a temperature of at least 1000° F for a minimum of 15 minutes after the last waste feed) allow for an agent free determination without analysis being preformed." Please provide the procedural logic that shows how process/generator knowledge will be used to make agent-free determinations. (CTUIR) (Hodney)</p> <p>Appendix L, Proposed Change Pages for Permit, WAP,</p>	

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	<p>Section 12, page 29 of 68, test stating: “All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for disposal to a RCRA Subpart C disposal facility.” Please eliminate the statement, or, reword it to unambiguously to indicate that agent contaminated waste (not just “waste”) may be shipped off-site only if it meets the bounding TRA/carbon addendum <i>and any other</i> permitted requirements for the shipment of waste. (CTUIR) (Hodney)</p> <p>Appendix L, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating: “After agent decontamination, sampling is complete and determined to meet the agent free criteria for the respective furnace/unit. At that time, agent free determination is not required prior to shipment of samples to an approved offsite laboratory.” Please either remove the above quoted text or add language that clearly explains its purpose. (CTUIR) (Hodney)</p> <p>PMR Appendix J, Item 6, WAP Section 12. The PMR is still incomplete. The new requirements proposed for addition to WAP Section 12 are still not described or identified and no rationale is provided to identify the basis for or to otherwise support the various new requirements, or lack thereof. (Hodney)</p> <p>The DEQ has historically required the UMCDF to specify the requirements within the permit itself rather than referring to an Army document. Please require the UMCDF to add the specific requirements for off-facility shipment of agent-contaminated wastes to the WAP instead of referencing the Army’s TRAs. (Hodney)</p> <p>PMR Appendix L, WAP Change Pages, Section 12, 8<sup>th</sup> paragraph. This was copied from Section 8. However, soil is no longer a good example of a matrix that is not specifically identified in SOP 559. (Hodney)</p>	

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
RTC-6	<p>Permit modification Request, page 3. This section states that the waste transporter and the RCRA TSDF are required to provide seamless emergency response from the facility to the RCRA TSDF. The permit modification states: “Should an incident occur during transport, the TSDF and the transport companies are required to fulfill all state and federal emergency response requirements including stabilization, reporting and remediation.” Pursuant to 40 CFR 264.71(c), whenever a shipment of hazardous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements of 40 CFR 262.40. 40 CFR 262.10(h). (EPA)</p> <p>Please clarify that UMCDF is responsible for emergency response. Managing safe transportation of the waste to the destination is the Army’s responsibility. (EPA)</p>	<p>Under RCRA’s “cradle-to grave” concept, UMCDF can never relinquish responsibility for the wastes that they generate.</p> <p>Although DEQ does not have jurisdiction to regulate these wastes once they leave Oregon, requirements have been added to Section 12 of the WAP to require the permittee to report that certain criteria have been met or plans are in place prior to each shipment of waste which includes emergency response teams being established along the transportation corridor.</p> <p>DEQ also notes that 40 CFR 263.30(a) and 263.31 places the primary responsibility for emergency response and the cleanup of transportation related releases on the transporter.</p>
RTC-7	<p>It is unclear in the permit modification request which TSDF is being referred to. (EPA)</p>	<p>DEQ regards all TSDFs permitted pursuant to RCRA Subtitle C to be suitable for the management of hazardous waste. UMCDF can use any TSDF that they can certify meets the management requirements contained in the WAP Section 12.</p>
RTC-8	<p>The permit modification must include a revised contingency plan and clear permit requirements for management of the agent-contaminated waste to the destination facility. (EPA)</p>	<p>The facility contingency plan, like the hazardous waste permit itself, is specific to management activities taking place on-site. Wastes, once shipped off-site, are not subject to the permitting requirements of 40 CFR 264 and 270 until they reach the receiving TSDF. The Department’s omnibus permitting authority does not extend to activities that are not subject to permitting standards.</p> <p>The intrastate and interstate transportation of hazardous materials, of which hazardous waste is a subset, is predominantly regulated by the Department of Transportation.</p>
RTC-9	<p>Provisions and requirements for emergency response along the transportation route must be identified prior to shipment. (EPA)</p>	<p>UMCDF is required to certify that emergency response provisions are in place prior to each shipment of waste made under the provisions of WAP Section 12.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
RTC-10	CDC has identified additional safeguards in the March 2, 2012, "White Paper on Shipment of Agent Contaminated Carbon from the Umatilla Chemical Agent Disposal Facility", which must be included in the permit modification and are described below. (EPA)	DEQ's review of this document did not identify any additional safeguards to the Bounding Transportation Risk Assessment identified by the CDC. The Bounding Transportation Risk Assessment was not used to develop permit requirements (See RTC-3).
RTC-11	<p>In addition, if multiple agents are in an individual drum or on an individual trailer, additional analysis and appropriate mitigation measures must be developed and reviewed by CDC and incorporated into the permit. (EPA)</p> <p>This Appendix does not state whether multiple agents will be shipped in one truck or if this scenario is addressed in the BTRA. (EPA)</p> <p>Either indicate that multi-agent contaminated waste <i>will not</i> be shipped off-site, or, include a transportation risk assessment for multi-agent contaminated waste with this PMR for public review. This transportation risk assessment should include the concentration limits for mixtures of GB, VX, and HD that ensure the risk for shipment of such waste remains in the "Low" category. (CTUIR)</p> <p>The UMCDF's PMR proposes the off-facility transport of multiagent-contaminated wastes and shipments based solely on the Army's own evaluation as to whether the risk is acceptable, but this is not addressed in WAP Section 12. (Hodney)</p>	In the supplemental information provided for this request, UMCDF included an additional site specific risk assessment for the shipment of multiagent-contaminated waste.
RTC-12	All these provisions must be included in the DEQ permit as well as the receiving facility's permit. (EPA)	<p>The issue relevant to UMCDF is whether the receiving facility can process the waste in accordance with the provisions of Section 12. UMCDF is required to certify that the facility can meet these requirements prior to each shipment of waste.</p> <p>Whether or not these provisions require modification to the receiving facility's permit is an issue between that facility and their regulatory agency. It is outside of DEQ's jurisdiction.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
RTC-13	Item 5(b) describes the calibration requirements for the instrument used to do the head space sampling. Revise the quality assurance/quality control requirements in the SOP. (EPA)	The calibration requirements are contained in the SOPs referenced in Section 12.
RTC-14	Item 5(c) outlines records that are required to support generator knowledge if this is being used instead of direct headspace readings. Revise the waste analysis plan (WAP) to include the specific records required by Item 5(c) that will support generator knowledge if it is used. (EPA)  Will generator knowledge in lieu of headspace monitoring be deemed sufficient for any particular waste streams and if so under what situations and/or conditions? (Umat Cty)  Process knowledge- see other comments regarding the unprotectiveness of the UMCDF's proposed limitless use of process knowledge in lieu of sampling. (Hodney)	The CDC requirement that the 0.5 IDLH be used as a maximum value, which was used to develop the site specific risk assessments, precludes the use of process knowledge in meeting the requirements of Section 12.
RTC-15	Revise the permit modification, including Appendix F, to describe how secondary waste will be evaluated for occluded spaces or free liquids. (EPA)	The concept of free liquids is clearly defined under RCRA, and is based on an EPA standard method for hazardous waste (i.e. Paint Filter Test).  Occluded spaces is not a term defined by RCRA, and is unique to the chemical demilitarization program. There are no test methods available to analytically determine the presence, or absence, of occluded spaces. By their nature, the presence of occluded spaces can only be determined through visual examination and knowledge of the waste characteristics.
RTC-16	The permit modification request does not include the specific procedures that are proposed for conducting the vapor screening/head space monitoring or agent monitoring of the truck during transport or while unloading. (EPA)  While Appendix F states that the trailers will be monitored for agent it is not clear what instrument will be used, how many monitors will be in the truck, and who will be responsible for assessing the data before opening the truck. Revise Appendix F to clearly state the instruments to be	The monitoring of the transport vehicle prior to opening is a worker health and safety issue under the Occupational Safety and Health Administration in general, and the CDC in particular as it relates to agent monitoring.  DEQ does not have the jurisdiction to regulate these wastes once they leave Oregon.



Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	used, provide SOPs for the monitoring including the calibration of the instruments, the number of monitors to used in the truck, and the person responsible for assessing the data before opening the truck. (EPA)	
RTC-17	DEQ must ensure that UMCDF's permit require that they verify that the receiving facility's permit includes provisions to conduct the near real time monitoring described in Item 5(f) during unloading as well as other waste handling requirements for the receiving facility. (EPA)	UMCDF is required to certify that provisions are in place at the receiving facility in support of the criteria used in the site specific risk assessments. Whether these provisions are part of the receiving facility's permit, or need to be, is an issue between the receiving facility and their regulatory agency.
RTC-18	Finally, include the requirement for the RCRA permitted TSDF incinerator to develop and implement, after agency approval, a plan to mitigate any concentrations measured above 1 VSL in the trailer upon receipt at the RCRA permitted TSDF incinerator. (EPA)  In addition, before the permit modification is approved the RCRA permitted TSDF must have adequate permit provisions in place to ensure the waste is managed in accordance with all of the CMA requirements. (EPA)	The monitoring of the transport vehicle prior to opening is a worker health and safety issue under the Occupational Safety and Health Administration in general, and the CDC in particular as it relates to agent monitoring.  UMCDF is required to certify that provisions are in place at the receiving facility in support of the criteria used in the site specific risk assessments. Whether these provisions are part of the receiving facility's permit, or need to be, is an issue between the receiving facility and their regulatory agency.
RTC-19	Item 5(h) of the CMA memorandum states that the maximum temperature of the trailer cannot exceed 70 degrees F. Include this restriction in Appendix F and describe how this requirement will be met. (EPA)	UMCDF is required to certify, prior to each shipment, that the cargo areas will be maintained at 70° F through the use of climate controlled cargo areas.
RTC-20	The DEQ and/or CDC must be included in the approval of any deviations from the permit requirements. (EPA)	A deviation from a permit requirement is noncompliance and is subject to enforcement by DEQ. Neither DEQ nor CDC has the authority to approve deviations from permit requirements.
RTC-21	Due to the acute toxicity of the agent contaminants and the fact that the agent is designated as a state-only waste and may not be a RCRA regulated waste once it is transported out of state, it is necessary to have a comprehensive contingency plan in place before the permit modification is approved. This contingency plan must address potential	DEQ is not aware of any regulatory authority that allows the inclusion of a transportation contingency plan into a treatment, storage and disposal permit.

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	responses to an incident, should one occur during transportation to the RCRA permitted TSDF incinerator. (EPA)	
RTC-22	<p>Appendix D includes a letter dated August 27, 2008 that summarizes the review of the BTRA by CDC. The CDC review states that the risk analysis used the average concentration in the headspace and, in consultation with the CMA, selected the maximum headspace concentration of 0.5 IDLH for each drum to allow personnel in the area of a drum that is visibly leaking to safely exit the area. Given that the BTRA used the average headspace concentration, proposing an upper limit of 0.5 IDLH for the average of all the drums is not consistent with the BTRA. The maximum value for any drum should be 0.5 IDLH. (EPA)</p> <p>Please revise the language in the PMR to indicate that a vapor headspace ceiling of ½ the IDLH will be applied to <i>each</i> secondary waste shipping container so that the PMR is consistent with the Army's official adoption of the CDC recommendation. (CTUIR)</p> <p>Page 4 of the PMR acknowledges the CDC's condition of acceptance of the Army's BTRA; however, the UMCDF did not include the condition of acceptance in the WAP. The Army's BTRA limits the concentration of the vapor in the headspace in the waste containers to an <u>average for each shipment</u> of no higher than 0.5 of the level considered immediately dangerous to life and health (IDLH); whereas the CDC stated the limit should be 0.5 IDLH for <u>each</u> container. (Hodney)</p>	The 0.5 IDLH maximum for each container recommended by the CDC has been incorporated into the language in Section 12 based on its use in the site specific risk assessments.
RTC-23	<p>Appendix J, item 3. The purpose of this modification is not clear. Provide an explanation justifying the need for this modification. (EPA)</p> <p>Appendix K, Table 3-3. It is not clear why changes to this table are proposed. Provide an explanation justifying the</p>	<p>The removal of the footnotes to Table 3-3 of the permit allows UMCDF to utilize the Toxic Maintenance Area for headspace monitoring and staging for off-site shipment.</p> <p>Section 12 contains a prohibition for using the provisions of that section for</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	<p>need for this modification. (EPA)</p> <p>Please add a footnote to Table3-3 indicating that liquid waste will be shipped off-site <i>only</i> if it is agent-free, and, provide evidence that the intended shipment waste from the MDB will meet <i>all</i> the permitted requirements for off-site shipment of liquid waste. (CTUIR)</p>	<p>wastes containing free liquids.</p>
RTC-24	<p>Appendix L, Proposed changes to the WAP, additional text added under item 12, page 28 of 68. The first paragraph, as proposed, references the BTRA for the level that can be shipped off-site, the specific concentration for each agent for each media must be identified in the permit modification. In addition, the methods to monitor/assess these concentrations must be included in the WAP. (EPA)</p>	<p>The allowable headspace concentrations for each agent and the sampling methods are included in Section 12.</p>
RTC-25	<p>There is no indication that Appendix M of UMCDF 11-002-WAST(3) has been removed. Please require that the UMCDF re-submit the <i>full</i> text of this PMR for public review <i>only</i> after the final UMCDF closure plan has been approved. (CTUIR)</p> <p>Because so many of my comments are the result of the UMCDF's failure to address the deficiencies identified by the DEQ's in its draft notice of deficiency on PMR UMCDF-11-000-MISC(3), a copy of which is not available via the DEQ's Chemical Demilitarization web page. (Hodney)</p>	<p>UMCDF withdrew PMR UMCDF 11-002-WAST(3) by letter on Feb. 21, 2012.</p> <p>The only permit modifications currently under consideration are those presented in the PMR UMCDF 12-010-WAST(3).</p>
RTC-26	<p>Please measure and report the extractive analysis limit corresponding to ½ IDLH for each type of porous material considered for off-site shipping. Alternatively, indicate that the extractive analysis limits 13.4, 0.4, and 77.7 ppm for VX, GB, and HD, respectively, will only be applied to carbon, and that compliance with the ½ IDLH criterion will be assessed for all other porous materials using shipping container headspace monitoring. (CTUIR)</p> <p>Due to their nature, porous wastes should always require</p>	<p>The provisions of Section 12 apply to non-porous wastes and spent carbon. No other porous wastes are authorized to use headspace monitoring for off-site shipping.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	<p>extractive analysis unless the UMCDF has documentation to demonstrate the waste has never been exposed to agent. In such a case, the definitions of the WAP already allow the UMCDF to declare this waste to be agent free without sampling and would be shipped off-facility in accordance with Section 8, not Section 12. Therefore, please require the UMCDF to revise this section to always require extractive analysis for porous agent-contaminated wastes. (Hodney)</p> <p>Provide the basis for the extractive analysis off-facility shipment criteria proposed for porous wastes, and what data is available documenting these levels are appropriate for all porous wastes, including, but not limited to, carbon. It does not seem likely that the different levels of contamination allowed for carbon, due to its propensity to entrap and retain the agent, would be appropriate for other porous wastes that would release the agent more readily. (Hodney)</p>	
RTC-27	Is the concentration level Immediately Dangerous to Life and Health (IDLH) for multi-agent contaminated wastes and/or carbon cumulative? Provide further clarification regarding the IDLH for multi-agent contaminated waste and/or carbon (Umat Cty)	<p>Since GB and VX are both nerve agents it is likely that their effects are cumulative. This does not affect the non-porous waste standard, as VX contaminated non-porous waste is not authorized for shipment under Section 12.</p> <p>For spent carbon, the VX standard has been lowered to maintain the 0.5 IDLH level.</p> <p>Because HD impacts different areas than nerve agents, HD exposure is not considered to be cumulative.</p> <p>The multi-agent risk assessment performed by CTUIR indicated that spent carbon can be shipped at low risk at these levels.</p>
RTC-28	Define management strategies for particular waste streams.	The provisions of Section 12. apply to non-porous wastes and spent carbon.

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	<p>At a minimum, identify waste streams to be specifically excluded from off-site treatment. (Umat Cty)</p> <p>In addition, please require the UMCDF to further revise this section to specify which agent-contaminated wastes are excluded from off-facility shipment per the NRC's recommendation. (Hodney)</p>	<p>DEQ has not identified any waste stream in this subset of secondary waste that is precluded from off-site shipment when they meet the criteria in Section 12.</p>
RTC-29	<p>PMR, Justification for Modification, 6<sup>th</sup> paragraph, pg 3. In this paragraph, the PMR states "There are also benefits for the environment on and adjacent to the Umatilla Chemical Depot if this change is made." While this is true for the local/regional area, this change basically just moves the risk from emissions elsewhere. (Umat Cty)</p> <p>Identify and provide further detail regarding the risks associated with the Treatment Storage and Disposal Facility (TSDF). What is the impact to that local area and are there any liability issues associated for the Depot with respect to the actual processing location? (Umat Cty)</p>	<p>The receiving facility is a commercial incinerator that runs 24 hours per day, seven days per week, and will do so regardless of whether it accepts UMCDF wastes.</p> <p>UMCDF will discontinue use of their incinerators when all wastes have been treated. Treating wastes that can be shipped at low risk at off-site treatment facilities will allow the UMCDF incinerators to be shut down earlier than if they had to continue treating these waste on-site.</p>
RTC-30	<p>PMR, Justification for Modification, 4<sup>th</sup> paragraph, pg 5. In this paragraph, the PMR states "It is possible that when the UMCDF receives sample results for a waste, the UMCDF may choose to decontaminate the waste, sample it again and then package and ship it." Define the protocol for the repackaging of waste containers. (Umat Cty)</p>	<p>Repackaging of wastes is not considered to be waste treatment and is not subject to permitting requirements.</p>
RTC-31	<p>There may be a need in the future for a site to ship individual waste drums above 0.5 IDLH or exceed the negligible risk category for average drum. Explain how this type of situation will be addressed if it is encountered. (Umat Cty)</p>	<p>There is no provision in Section 12 for shipping any container in which the headspace concentration is greater than 0.5 IDLH.</p>
RTC-32	<p>The Environmental Quality Commission (EQC) is required to determine the best available technology (BAT) for treatment of hazardous wastes. The DEQ and EQC recently reevaluated the BATs for agent-contaminated secondary</p>	<p>Best available technology determinations, required by Oregon Administrative Rules 340-120-0010(2)(c), applies only to treatment that occurs under a permit issued by DEQ. Off-site shipment is not treatment, and is not subject to a BAT determination.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	wastes and carbon, and determined the BAT for both was on-site treatment in the UMCDF's incinerators. In order to have complete information available to the public for review of this PMR, please provide a copy of the DEQ and EQC's new determination that offsite shipment of agent-contaminated wastes is the BAT. (Hodney)	
RTC-33	The Permittees still have not provided a copy of the EIS required under the National Environmental Policy Act (NEPA) to address the off-facility shipment of agent-contaminated wastes (DEQ draft NOD item #10). Please require the UMCDF to prepare an EIS for the off-facility shipment of UMCDF agent-contaminated wastes and provide a copy to the public and DEQ for review as part of this PMR. (Hodney)	<p>The National Environmental Policy Act is administered by the Council on Environmental Quality under the Executive Office of the President.</p> <p>Whether an environmental impact statement was done, or needs to be done, is outside of DEQ's jurisdiction.</p> <p>The requirements of NEPA are not a prerequisite that must be met prior to the issuance or modification of a hazardous waste permit.</p>
RTC-34	PMR Appendix H, Items 1 and 2, Condition II.B.2 and II.B.3 changes. The rationale provided for these changes is incorrect. The National Research Council (NRC) was contracted and paid by the U.S. Army to conduct studies to support shipping agent-contaminated wastes offsite instead of treating them onsite (Contract No. W911-NF-06-C-0067). The NRC's report supported the Army's desire to ship agent-contaminated wastes off facility to a commercial incinerator under certain conditions, but did not recommend changes to the UMCDF's permit. Please require the UMCDF to provide a factually correct basis for these changes. (Hodney)	Comment noted.
TC-35	In addition, Section 12 does not identify what the sampling requirements will be for agent-contaminated wastes that will be shipped off facility. Section 2 and Table 2 has sampling requirements for wastes destined for off-facility shipment, but: 1) Section 12 does not indicated if these are the sampling requirements for agent-contaminated wastes,	<p>This request did not propose any new wastes streams for inclusion into the WAP, so no new wastes streams are included in Section 2.</p> <p>Section 12. has been developed to allow wastes from Table 1, and wastes from Table 2 that do not meet the agent-free criteria of Section 8., to be treated at an alternative incineration facility when the wastes can be shipped</p>

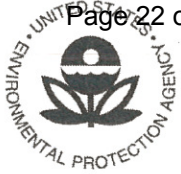
Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	<p>2) Except for wood, which allows air samples, the Table 2 sampling requirements are limited to extractive sampling and do not include any headspace sampling requirements,</p> <p>3) Section 2 and Table 2 do not include all the waste streams the UMCDF now intends to ship off-facility, and</p> <p>4) Except for spent carbon that will not be treated onsite, which was recently updated, the existing WAP sampling requirements are inadequate for the offsite shipment of highly-contaminated wastes. The existing Table 2 sampling requirements are primarily applicable to HD ton container campaign and/or wastes with low levels of agent exposure. This PMR did not update the WAP to include initial and conformational sampling requirements for the wastes with high levels of contamination that were previously required to be treated onsite, but are now proposed for off-facility shipment. This is a significant change in the types of wastes being shipped off-facility and the waste management process, and the waste characterization sampling requirements should have been identified and revised accordingly. (Hodney)</p>	<p>at low risk. UMCDF is not required to use the provisions of Section 12 for any other waste stream.</p> <p>Adding initial and confirmation sampling is designed for wastes that will be treated at UMCDF. Sampling requirements for wastes treated at other facilities are controlled by the permits issued for those facilities.</p>
RTC-36	Provide the basis for the proposed headspace sampling analytical criteria, and what data is available documenting these levels are appropriate for all nonporous wastes (Hodney)	This information was presented in the permit modification submittal.
RTC-37	The proposed language does not incorporate all of the sampling requirements currently required in Section 8. For the off-facility shipment of agent-free wastes. For example, the deletion of the following requirements: ..analytical results will be recorded as concentrations in units of parts per billion (ppb). Analytical results below the PCC, but greater than 0.5 PCC, will be flagged as estimates. All analytical results will be recorded with decimal places truncated; rounding will not occur.” Please require the UMCDF, at a minimum, to establish appropriate data	<p>The purpose of the WAP is to establish standards for compliance. Flagging of results as estimates does not contribute to determining compliance with any standard.</p> <p>Improved analytical practices have significantly lowered the method detection limits, so flagging results between 0.5 PCC and PCC as estimates is no longer accurate.</p> <p>Data recording requirements are contained in SOP UM-0000-M-095.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	recording and reporting requirements and to add the same requirements as they are currently required to meet for off-facility shipment of agent-free wastes (modified for the different off-facility shipment criteria), or to provide a basis for the omission of these requirements from Section 12. (Hodney)	
RTC-38	Because of the definitions in the permit, as the UMCDF has written Section 12, the UMCDF will only be allowed to ship agent-contaminated wastes elsewhere on the Depot-not to Port Arthur, Texas, as intended. For consistency, please require the UMCDF to revise Section 12 to allow the “ <b>off-facility</b> ” shipment of wastes or revise the WAP and all other instances in the permit to redefine offsite and off-facility shipment. (Hodney)	The definitions section of module I of the permit contains the following language: “Site,” as used in this permit, shall be synonymous with “Umatilla Chemical Agent Disposal Facility (UMCDF) and/or “facility.” “UMCDF” and “facility,” as used in this permit shall include this definition of “site.” The terms “site” and “facility”, as they are used in the permit, are synonymous.
RTC-39	Please require the UMCDF to revise this new Section 12 to be consistent with the rest of the WAP e.g., “All off-facility wastes must be sampled in accordance with Table 2. The waste will be considered to have met the off-facility shipment requirements if the analytical results of the samples meet the acceptance criteria of this section.” (Hodney)  Please also require the UMCDF to revise Section 2 and Table 2 to specify the initial and confirmation waste sampling requirements (type and frequency), for both extractive and headspace sampling, as applicable, for agent-contaminated wastes destined for off-facility shipment. (Hodney)	Table 2 applies to wastes that are being sent off-site under the agent-free provisions of Section 8. Table 2 does not apply to wastes managed under Section 12.
RTC-40	In addition, existing deficiencies in the WAP need to be remedied. Some of the waste streams have no post-stockpile treatment operations agent confirmation sampling requirements. For example, currently the only MPF ash sampling agent confirmation sampling requirements are for HD ton containers-the WAP has not been updated with the	The activities suggested in this comment are beyond the scope of this permit modification request.  The WAP contains confirmation sampling requirements for MPF ash aside from HD ton containers.



Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	agent-confirmation requirements for nonstockpile waste treatment wastes currently being treated in the MPF; i.e., the UMCDF is not currently required to sample the MPF ash to verify the dismantled equipment and wastes exiting the MPF are agent free before sending them off facility. (Hodney)	
RTC-41	Provide the basis for the selection of DAAMS monitors only, and not also the use of co-located ACAMS which would identify if the wastes being sampled exceeded the acceptance criteria at any point during the sampling period possibly due to shifting or settling of the waste, etc. which could indicate an occluded space in which agent has been trapped. (Hodney)  If ACAMS monitoring is added, please require the UMCDF to include the ACAMS analytical SOP. (Hodney)	DAAMS monitoring has been used for compliance determinations since the beginning of agent operations, and is consistently used to verify the accuracy of ACAMS monitors.  UMCDF has the option to add ACAMS monitors to the headspace monitoring SOP if they choose to do so. If they do, the ACAMS analytical SOP will also be added.
RTC-42	Please require the UMCDF to provide the basis for the use of VSL instead of a CDC promulgated airborne exposure limit as the pass criteria. VSL was not promulgated by the CDC, but is an Army-specific air exposure limit that is independent of time. The CDC has also previously requested the Army to provide public-health based justification for VSL as pass criteria. (Hodney)	Vapor Screening Limit is a concept established by the CDC to ensure compliance with the short term exposure limit and is defined in the permit.  In Section 12, the headspace limits are expressed as both the standard units (ex. mg/m <sup>3</sup> ) and VSL.
RTC-43	Please have the UMCDF specify that it must comply with the carbon addendum Table 2 requirements (not just Table 1). (Hodney)	The requirements of Table 2 of the carbon addendum, as they were used in the site specific risk assessments, have been incorporated into the requirements of Section 12.
RTC-44	Due to the deficiencies in the carbon treatability study (CTS), the DEQ did not accept the UMCDF's assertion that CTS results answered the NRC's recommendation to segregate mercury-contaminated carbon from other carbon and to evaluate and select appropriate methods for the treatment and disposal of mercury-contaminated carbon. Please require the UMCDF to provide the information requested in this NOD item to resolve the NRC's	The NRC's recommendation to segregate mercury-contaminated carbon from other carbon is outside the scope of this permit modification request.  There is no mercury contaminated spent carbon remaining at UMCDF.

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text)	DEQ RESPONSE
	Recommendation 3-5. (Hodney)	
RTC-45	Since the methods for agent-free sampling of carbon had to be revised before the DEQ approved them in 2011, the UMCDF did not have a valid method for the 2007 carbon studies to have made the determination the carbon was agent free. Please direct the UMCDF to provide valid data to support their conclusions. (Hodney)	This comment relates to compliance with existing permit requirements in the WAP, Section 8. It is outside the scope of the permit modification under consideration.
RTC-46	Provide data and information supporting the off-facility shipment of DPE suits since the drums will contain occluded spaces. (Hodney)	<p>Section 12 does not require, or prohibit, the management of any particular waste stream under the provisions of that section.</p> <p>Section 12 does not apply to wastes that contain occluded spaces.</p>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
AIR, WASTE AND TOXICS

JUN - 6 2012

Lissa Druback  
Oregon Department of Environmental Quality  
Columbia George Community College  
400 E. Scenic Drive; Suite 307  
The Dalles, OR 97058

**Re: Comments on the Class 3 Permit Modification Request Dated April 2012 for the Umatilla Chemical Agent Disposal Facility (UMCDF) to Ship Agent Contaminated Waste Off-Site, Tracking Number UMCDF-12-010-WASTE(3)  
ORQ 000 009 431-01**

Dear Ms. Druback:

The U.S. Environmental Protection Agency, Region 10 (EPA) has completed its review of the April 2012 proposed class 3 permit modification request (cited above) to allow the Army to ship agent contaminated waste offsite, an activity currently prohibited by the permit.

If you have any questions, regarding these comments please contact me by phone at (206)553-6636 or by email at [meyer.linda@epa.gov](mailto:meyer.linda@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Linda Meyer".

Linda Meyer  
RCRA Corrective Action and Permits Team  
Office of Air, Waste and Toxics

Enclosure

cc: Rich Duval, DEQ Pendleton Office

Comments on the UMCDF Permit Modification Request, UMCDF-12-010-WAST(3)  
Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage  
and Disposal Facility

General Comments

Before DEQ can approve this permit modification a number of issues must be resolved.

- (1) The permit modification must clearly require the Permittee to treat the agent-contaminated waste in a RCRA permitted incinerator. Other disposal options, such as land disposal, are not consistent with the Center for Disease Control's (CDC's) recommendations.
- (2) The permit modification request does not address all aspects of the 2008 memorandum from the U.S. Army's Chemical Materials Agency's (CMA's) former director, Conrad Whyne, included as appendix C to the permit modification request.
- (3) The permit modification request does not include the specific procedures that are proposed for conducting the vapor screening/head space monitoring or agent monitoring of the truck during transport and while unloading. Because this is the first "stockpile" site in the US proposing to ship this volume of agent-contaminated waste with concentrations at these high levels (0.5 immediately dangerous to life and health (IDLH), and greater than 500 VSL), it is critical that emergency response systems, all of the safeguards identified by the CDC, and protective permit conditions with appropriate procedures are in place at the receiving RCRA treatment, storage and disposal facility (TSDF) before DEQ allows the waste to be shipped.
- (4) The specific permit modification language provided in Appendices J, K and L of the modification request is incomplete, unclear, and/or unsupported.

Specific comments are included below.

Specific Comments

- (1) Permit Modification Request, page 3. This section states that the waste transporter and the RCRA TSDF are required to provide seamless emergency response from the facility to the RCRA TSDF. The permit modification states: "Should an incident occur during transport, the TSDF and the transport companies are required to fulfill all state and federal emergency response requirements including stabilization, reporting, and remediation." Pursuant to 40 CFR 264.71(c), whenever a shipment of hazardous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements of part 40 CFR 262. 40. CFR 262.10(h). It is unclear in the permit modification request which TSDF is being referred to. Please clarify that UMCDF is responsible for emergency response. Managing the safe transportation of the waste to the destination is the Army's responsibility. The permit modification must include a revised contingency plan and clear permit requirements for management of the agent-



contaminated waste to the destination facility. Provisions and requirements for emergency response along the transportation route must be identified prior to shipment. CDC has identified additional safeguards in the March 2, 2012 "White Paper on Shipment of Agent Contaminated Carbon from the Umatilla Chemical Agent Disposal Facility", which must be included in the permit modification and are described below. In addition, if multiple agents are in an individual drum or on an individual trailer, additional analysis and appropriate mitigation measures must be developed and reviewed by CDC and incorporated into the permit. All these provisions must be included in the DEQ permit as well as the receiving facility's permit.

(2) Appendix C contains the 2008 memorandum from Conrad Whyne regarding requirements for CMA sites shipping waste with a vapor screening level (VSL) of greater than one (1.0) to a RCRA permitted TSDF incinerator. The following items from this memorandum are not addressed in the permit modification request. Revise Appendix F to include the following:

a) Item 2 of the 2008 memorandum states that shipment of waste from a CMA facility to a RCRA permitted TSDF incinerator must be done in accordance with the seven documents referenced in item 1 of the memorandum. The permit modification must be revised to include the references in item 1 and identify how the referenced requirements will be met. In addition, the permit modification must specify that the waste will go to a RCRA permitted TSDF incinerator.

b) Item 5 requires that implementation of items a through j be met when the Bounding Transportation Risk Assessment (BTRA) is used to ship wastes greater than 1 VSL. The permit modification request must include these requirements.

- Item 5 (a) requires head space monitoring at a specific temperature and duration. The standard operating procedure (SOP) for the headspace monitoring must be included and provided to CDC for review and acceptance. The size and arrangement of containers must be included and consistent with the assumptions used in the BTRA.
- Item 5(b) describes the calibration requirements for the instrument used to do the head space sampling. Revise the quality assurance/quality control requirements for the instruments used to meet item 5 (a) and include these requirements in the SOP.
- Item 5 (c) outlines records that are required to support generator knowledge if this is being used instead of direct headspace readings. Revise the waste analysis plan (WAP) to include the specific records required by Item 5(c) that will support generator knowledge if it is used.
- Item 5(d) states that all solid porous and non-porous materials, except carbon filters, will have no occluded spaces or free liquids and shall be dismantled. As currently drafted, Appendix F of the permit modification simply states that

UMCDF is planning to institute controls and measures to not allow occluded spaces or free liquids. Page 3 of the permit modification request implies that shipping waste off-site will minimize worker exposure since the waste is taken from storage and loaded directly to a transport truck. It is not clear how or where the stored secondary waste will be evaluated for occluded spaces or free liquids in order to meet this CMA recommendation. Revise the permit modification, including Appendix F, to describe how secondary waste will be evaluated for occluded spaces or free liquids to meet CMA recommendation Item 5(d).

- Item 5(e) identifies the DOT packaging requirements. Most of these requirements are repeated in Appendix F, however, this Appendix does not state whether multiple agents will be shipped in one truck or if this scenario is addressed in the BTRA. Revise Appendix F to address this issue directly.
- Item 5(f) requires near real time monitoring of the trailers. While Appendix F states that the trailers will be monitored for agent it is not clear what instrument will be used, how many monitors will be in the truck, and who will be responsible for assessing the data before opening the truck. Revise Appendix F to clearly state the instruments to be used, provide SOPs for the monitoring including the calibration of the instruments, the number of monitors to be used in the truck, and the person responsible for assessing the data before opening the truck. DEQ must ensure that UMCDF's permit require that they verify that the receiving facility's permit includes provisions to conduct the near real time monitoring described in Item 5(f) during unloading as well as all other waste handling requirements for the receiving facility. Finally, include the requirement for the RCRA permitted TSDF incinerator to develop and implement, after agency approval, a plan to mitigate any concentrations measured above 1 VSL in the trailer upon receipt at the RCRA permitted TSDF incinerator.
- Item 5(h) of the CMA memorandum states that the maximum temperature of the trailer cannot exceed 70 degrees F. Include this restriction in Appendix F and describe how this requirement will be met.
- Item 5(j) requires that documents are prepared based on guidance in reference 1(c). These reference documents must be included as part of the permit modification request.

c) Item 8 of the CMA memorandum states that all efforts shall be made to ensure that the requirements of the CMA memorandum are coordinated with the CMA Secondary Waste and Closure Team. A contact for this team must be included in the permit modification request and evidence of the team's concurrence with this permit modification should be requested by DEQ. This requirement states that any deviations from the CMA memorandum must be approved by the CMA Secondary Waste and Closure Team and the CMA Risk Management Directors. The DEQ and/or CDC must be included in the approval of any deviations from the permit requirements. Appendix F must be revised to include this requirement.



(3) Page 4 of the permit modification states that if an incident occurs during transport, the RCRA TSDF and the transport companies are required to fulfill all state and federal emergency response requirements including stabilization, reporting, and remediation. Due to the acute toxicity of the agent contaminants and the fact that the agent is designated as a state-only waste and may not be a RCRA regulated waste once it is transported out of state, it is necessary to have a comprehensive contingency plan in place before the permit modification is approved. This contingency plan must address potential responses to an incident, should one occur during transportation to the RCRA permitted TSDF incinerator. In addition, before the permit modification is approved the RCRA permitted TSDF must have adequate permit provisions in place to ensure the waste is managed in accordance with all of the CMA requirements.

(5) Appendix D includes a letter dated August 27, 2008 that summarizes the review of the BTRA by CDC. The CDC review states that the risk analysis used the average concentration in the headspace and, in consultation with the CMA, selected the maximum headspace concentration of 0.5 of the IDLH for each drum to allow personnel in the area of a drum that is visibly leaking to safely exit the area. Given that the BTRA used the average headspace concentration, proposing an upper limit of 0.5 IDLH for the average of all the drums is not consistent with the BTRA. The maximum value for any one drum should be 0.5 IDLH.

(6) Appendix J, item 3. The purpose of this modification is not clear. Provide an explanation justifying the need for this modification.

(7) Appendix J, item 4. Agent-contaminated material, if shipped off-site must go to a RCRA permitted TSDF incinerator. Revise the proposed permit condition.

(8) Appendix K, Proposed permit language, condition II.B.2. This revision must state that agent-contaminated material, if shipped off-site, will be treated in a RCRA permitted RCRA permitted TSDF incinerator.

(9) Appendix K, Table 3-3. It is not clear why changes to this table are proposed. Provide an explanation justifying the need for this modification.

(10) Appendix L, Proposed changes to the WAP, additional text added under item 12, page 28 of 68. The first paragraph must clearly state that the agent-contaminated material going off-site must go to a RCRA permitted TSDF incinerator. The first paragraph, as proposed, references the BTRA for the level that can be shipped off-site, the specific concentration for each agent for each media must be identified in the permit modification. In addition, the methods to monitor/assess these concentrations must be included in the WAP.

(11) Appendix L, proposed changes to the WAP, first paragraph, page 29 of 68. It is unclear what is meant by this paragraph, beginning, "samples will be considered compliant if they are below the..". Revise or remove this paragraph.

(12) Appendix L, proposed changes to the WAP, second paragraph, page 29 of 68. It is not clear how extractive analysis will be conducted. A specific reference to the sampling method and analysis must be included. It is not clear how process knowledge can be used to demonstrate a specific analytical level. Please explain. What is the basis for these proposed concentrations? The concentrations do not appear to be protective. Revise this section of the WAP.

(13) Appendix L, proposed changes to the WAP, third paragraph, page 29 of 68. The containers that waste will be shipped in should be specified as well as the total time the headspace monitoring will be conducted. The specific temperature at which the monitoring will be done must be included. It is not clear how these headspace concentrations compare to the 0.5 IDLH headspace limit. Please provide an explanation and include the calculations used to justify your explanation.

(14) Appendix L, proposed changes to the WAP, fourth paragraph, page 29 of 68. The paragraph beginning, "After agent decontamination, sampling..", appears to be out of place. Remove or provide additional clarification.

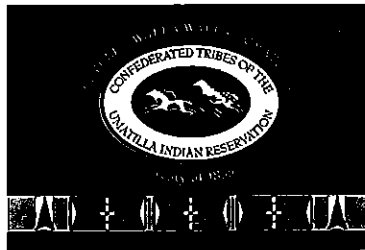
(15) Appendix L, proposed changes to the WAP, fifth paragraph, page 29 of 68. It is unclear what is meant by the statement concerning maintaining the furnace at a temperature of at least 1000 degrees F for a minimum of 15 minutes after the last waste feed. The EPA incinerator closure guidance recommends decontamination of incinerators for a minimum of 4 hours at the permitted operating temperature to destroy all of the hazardous byproducts and constituents formed during treatment. If this is the proposed decontamination method for the incinerator the WAP must be revised to be consistent with the closure requirements.

(16) Appendix L, proposed changes to the WAP, sixth paragraph, page 29 of 68. This statement must clarify that the agent-contaminated waste must go to a RCRA permitted TSDF incinerator for treatment, not to a Subtitle C facility for disposal.

(17) Appendix L, proposed changes to the WAP, seventh paragraph, page 29 of 68. The SOP for collecting a headspace sample must be included in the permit modification request.



Attachment C  
 Oct. 25-26, 2012, EQC meeting  
**Confederated Tribes of the  
 Umatilla Indian Reservation**  
 Department of Science & Engineering



46411 Timine Way • Pendleton, OR 97801  
 PHONE / FAX 541-429-7040  
 info@ctuir.com • www.umatilla.nsn.us

11 June 2012

Mr. Daniel Duso  
 Department of Environmental Quality  
 Eastern Region Pendleton Office  
 700 SE Emigrant, #330  
 Pendleton, OR 97801

Re: CTUIR comments on PMR UMCDF-12-010-WAST(3) – *Shipment of Agent Contaminated Waste to a Commercial Treatment, Storage, and Disposal Facility*

Dear Mr. Duso:

On behalf of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Science and Engineering (DOSE), I am submitting the following comments to PMR UMCDF-12-010-WAST(3) - *Shipment of Agent Contaminated Waste to a Commercial Treatment, Storage, and Disposal Facility*.

As indicated in these comments, the CTUIR finds this PMR to be unsuitable for approval. If you have any questions concerning this matter please feel free to contact me at (541) 429-7420.

Sincerely,

Rodney S. Skeen, Ph.D, P.E.  
 Manager, CTUIR-EMP/DOSE

Cc:  
 Stuart Harris, Director, CTUIR DOSE  
 File

Enclosure

RECEIVED  
 JUN 12 2012

State of Oregon  
 Dept. of Environmental Quality  
 Eastern Region - Pendleton

**CTUIR Comments on PMR UMCDF-12-010-WAST(3)**  
***Shipment of Agent Contaminated Waste to a Commercial Treatment, Storage,  
and Disposal Facility***

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**General Comment:** Review of comments submitted by the CTUIR (DEQ item # 12-0083), by former DEQ personnel (DEQ item # 12-0184), and by the EPA (DEQ item # 12-0075) on UMCDF-11-002-WAST(3) indicates that a host of deficiencies have not been addressed. These deficiencies include but are not limited to:

- This PMR proposes changes to the waste analysis and disposal segments of a closure plan that does not yet exist.
- The retention of language allowing for shipment of waste containers with agent headspace concentrations exceeding  $\frac{1}{2}$  the IDLH even though the September 2008 directive issued by CMA Director Conrad Whyne clearly states that "*The CDC recommendation to establish a 0.5 IDLH ceiling is accepted and shall be implemented.*" Thus, any language suggesting that waste drums with agent headspace concentrations exceeding  $\frac{1}{2}$  the IDLH is in contradiction with official U.S. Army policy.
- Agent concentrations are still not consistently stated in terms of units relevant to public safety, e.g. fraction of the IDLH.
- A detailed procedure for monitoring headspace agent concentrations in waste drums is still absent.
- A statement that liquid waste will not be shipped off-site *unless* it is agent-free is still absent.
- No indication that Appendix M of UMCDF-11-002-WAST(3), which inappropriately proposed changes to the UMCDF closure plan (see next comment), has been removed.
- Language describing how agent contaminated process equipment will be properly reduced and containerized for shipment as secondary waste has not been added.
- No description of how process and/or generator knowledge will actually be used to make an agent-free determination even though the use of process and/or generator knowledge to make an agent-free determination is reserved.

UMCDF 11-002-WAST(3) was withdrawn without formal response to the comments submitted by the EPA, DEQ, and CTUIR. Since UMCDF-12-010-WAST(3) is essentially the same as UMCDF 11-002-WAST(3), the vast majority of DEQ, EPA, and CTUIR concerns remain unaddressed.

**Requested Action:** Please reject this PMR, as the concerns of the DEQ, EPA, and CTUIR expressed in comments submitted during the public review period for UMCDF 11-002-WAST(3) have not been addressed. Please require that the UMCDF re-submit the *full* text of this PMR for public review *only* after the final UMCDF closure plan has been approved.

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R E C E I V E D  
JUN 12 2012

**UMCDF 11-002-WAST(3), Appendix M. Proposed Change Pages for Closure Plan, Section 3.9, Area of UMCDF Stack Air Dispersion, page 27, text stating:** *"In accordance with RCRA Permit Condition II.J.1, a comparison of post operational the surrounding soil concentrations where air dispersion modeling indicates deposition potentially resulting in levels of hazardous constituents above background will be sampled in accordance with as defined and provided in this Closure Plan."*

**Comment:** Proposed changes to the language describing sampling and analysis of the UMCDF stack air dispersion area are indicated above. This PMR is an inappropriate place for proposing changes to the language describing sampling and analysis of the UMCDF air dispersion area, as the off-site shipment of agent contaminated waste has no bearing on how the UMCDF air dispersion area will be assessed. In addition, no rationale for this proposed change is provided in UMCDF 11-002-WAST(3).

The change to Section 3.9, *Area of UMCDF Stack Air Dispersion*, proposed here eliminates any reference to air dispersion modeling as a guide for determining the area potentially impacted by UMCDF emissions. The proposed change conflicts with the plan for soil sampling in the UMCDF air dispersion area agreed upon by the Army, ODEQ, and the CTUIR in 2011.

This issue was originally raised in the CTUIR's comments to UMCDF 11-002-WAST(3), but the *Table of Changes* (Appendix J), *Proposed Change Pages for WAP* (Appendix L), and *Proposed Change Pages for Permit* (Appendix K) of the PMR currently under review do not indicate that Appendix M of UMCDF 11-002-WAST(3) has been removed. As such, this reviewer can only assume that Appendix M of UMCDF 11-002-WAST(3) is still a part of the PMR under review.

This PMR is an inappropriate place for proposing *any* changes to the UMCDF closure plan, especially since the UMCDF closure plan does not yet exist.

**Requested Action:** Please reject this PMR, as there is no indication that Appendix M of UMCDF 11-002-WAST(3) has been removed. Please require that the UMCDF re-submit the *full* text of this PMR for public review *only* after the final UMCDF closure plan has been approved.

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**Page 4, last paragraph text stating:** *"The Bounding TRA and the addendum determined, as long as the concentration of the vapor headspace was on average for the shipment no higher than half of the level considered immediately dangerous to life and health (IDLH) [and depending on the number of shipments and the distance to the TSDF], the risk posed by transporting the waste to the TSDF was low."*

**Comment:** One CDC requirement for acceptance of the BTRA is that the agent vapor limit should be ½ the IDLH for *each* shipping container. As indicated in the first comment above, the Army has accepted the ½ IDLH ceiling for *each* waste container as required by the CDC.

**Requested Action:** Please revise the language in the PMR to indicate that a vapor headspace ceiling of ½ the IDLH will be applied to *each* secondary waste shipping container so that the PMR is consistent with the Army's official adoption of the CDC recommendation.

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**Page 5, second paragraph, text stating:** *“Section 2.3 of the Bounding TRA states that drums containing more than one agent type may be acceptable for shipment, but will be addressed on a site specific basis. To maintain compliance with the bounding TRA, UMCDF has discussed this with CMA and has been directed that plans for the shipment of any multi-agent waste or shipments containing more than one agent type would be submitted to the CMA risk assessors. Risk, on a shipment-by-shipment basis, would be assessed to assure it remains within the low risk category.”*

**Comment:** The shipment of multi-agent contaminated waste has not been addressed in any transportation risk assessment. Assessment of the shipment of multi-agent contaminated waste on a shipment-by-shipment basis is not acceptable because it eliminates public scrutiny. A transportation risk assessment for multi-agent contaminated waste must be performed and included with this PMR for public review if there is intent to ship multi-agent contaminated waste.

**Requested Action:** Either indicate that multi-agent contaminated waste *will not* be shipped off-site, or, include a transportation risk assessment for multi-agent contaminated waste with this PMR for public review. This transportation risk assessment should include the concentration limits for mixtures of GB, VX, and HD that ensure the risk for shipment of such waste remains in the “Low” category.

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**Appendix J, page J-1, change item 3; and Appendix L, indicating changes to Table 3-3 Maximum Allowable Secondary Wastes in the MDB**

**Comment:** The physical units indicated in Table 3-3 are “gal”; as such, it is assumed that Table 3-3 refers to liquid waste. Since the rationale given for this change (“*If this PMR is approved, waste in these areas may be shipped off-site.*”) indicates the intent to ship liquid waste off-site, a footnote that clearly indicates liquid waste will be shipped *only if it is agent-free* needs to be added to Table 3-3.

In addition, the shipment of MDB stored liquid wastes needs to conform to all permitted requirements for the off-site shipment of liquid waste. As such, language needs to be added to this PMR demonstrating that *all* the permitted requirements for off-site shipment of liquid waste from the MDB will be met.

**Requested Action:** Please add a footnote to Table 3-3 indicating that liquid waste will be shipped off-site *only* if it is agent-free, and, provide evidence that the intended shipment of liquid waste from the MDB will meet *all* the permitted requirements for off-site shipment of liquid waste.

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**Appendix J, page J-2, change item 6:** *"New text has been added to the WAP to instill primary requirements of the bounding TRA and the carbon addendum."*

**Comment:** This item encompasses eight individual additions to Section 12 of the WAP. The rationale given for this change ("See Item 4.") is not adequate because it does not address each addition to the WAP individually.

**Requested Action:** Please provide a rationale for each new item added to Section 12 of the WAP.

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 28 of 68, text stating:** *"Regardless of requirements elsewhere in this document, as allowed by Permit Condition II.B.2, any material which complies with the Bounding Transportation Risk Assessment for > 1 Vapor Screening Level (VSL) Waste (CMA 2008) [the bounding TRA] or the Addendum to the Bounding TRA: Assessment of Risk from Offsite Shipment of Spent Carbon (CMA 2009) [the carbon addendum] may be shipped for off-site disposal at a RCRA Subtitle C TSDF. The criteria in this section apply to all waste streams destined for offsite disposal at a RCRA Subtitle C TSDF."*

**Comment:** The language "Regardless of requirements elsewhere in this document, as allowed by Permit Condition II.B.2..." potentially allows the UMCDF to disregard other permitted requirements applicable to off-site shipment of secondary waste.

**Requested Action:** Please remove the language "Regardless of requirements elsewhere in this document, as allowed by Permit Condition II.B.2".

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating:** *"Samples will be considered compliant if they are below the extractive analysis or headspace monitoring criteria identified in this section."*

**Comment:** What is the meaning of "compliant"? Compliant with what? Is this referring to compliance with the less than ½ IDLH condition for off-site shipping required by the CDC?

**Requested Action:** Please specify what compliance requirement is being referred to.

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating:** *"Porous materials (for example carbon or wood) require extractive analysis or process knowledge that the waste complies with extractive analysis limits. Extractive analysis results will be considered compliant if they are below 13.4 ppm for VX, 0.4 ppm for GB, and 77.7 for HD by weight."*

**Comment:** The pertinent criterion for safe shipping of agent contaminated waste is that shipping container agent headspace concentrations remain below ½ IDLH. The values 13.4 ppm (VX), 0.4 ppm (GB), and 77.7 ppm (HD) by weight are the maximum allowable agent concentrations on *carbon* to maintain agent headspace concentrations below ½ the IDLH. These values apply to carbon only; they are not the applicable extractive analysis limits corresponding to the less than ½ IDLH criterion for other types of porous waste. This is a physical reality that cannot be avoided.

Each type of porous waste will have a different extractive analysis limit that corresponds to agent headspace concentrations at ½ IDLH. If the UMCDF is going to resort to extractive analysis for porous materials other than carbon in order to assess compliance with the less than ½ IDLH criterion, the extractive analysis limit *for each type of porous waste* needs to be determined and provided for review.

**Requested Action:** Please measure and report the extractive analysis limit corresponding to ½ IDLH for each type of porous material considered for off-site shipping. Alternatively, indicate that the extractive analysis limits 13.4, 0.4, and 77.7 ppm for VX, GB, and HD, respectively, will only be applied to carbon, and that compliance with the ½ IDLH criterion will be assessed for all other porous materials using shipping container headspace monitoring.

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating:** *"Other materials may be checked using headspace monitoring or process knowledge that the waste complies with headspace monitoring limits. Headspace monitoring results will be obtained by placing the waste in an enclosure of appropriate volume (e.g. container) for a sufficient period of time to ensure a representative sample is obtained."*

**Comment:** A tested and proven headspace monitoring procedure is absent from this PMR. This PMR is not sufficiently protective of human health in the absence of such a procedure.

**Requested Action:** Please add a tested and proven headspace monitoring procedure to this PMR for the public to review.

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating:** *“Process knowledge or generator knowledge (e.g., no exposure in an agent environment, maintaining the furnace at a temperature of at least 1000° F for a minimum of 15 minutes after the last waste feed) allow for an agent free determination without analysis being preformed.”*

**Comment:** No information is provided indicating how process/generator knowledge will be applied to make an agent-free determination. A statement of the intent to use process/generator knowledge without any supporting information is not adequate.

Also, the word “preformed” should be “performed”.

**Requested Action:** Please provide the procedural logic that shows how process/generator knowledge will be used to make agent-free determinations.

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating:** *“All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for disposal to a RCRA Subpart C disposal facility.”*

**Comment:** The wording of this statement is ambiguous, as it can be interpreted to suggest that *all* UMCDF waste may be shipped if it meets the bounding TRA or carbon addendum criteria even if other permitting requirements for shipment of waste are not met.

**Requested Action:** Please eliminate this statement, or, reword it to unambiguously to indicate that agent contaminated waste (not just “waste”) may be shipped off-site only if it meets the bounding TRA/carbon addendum *and any other* permitted requirements for the shipment of waste.

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**Appendix K, Proposed Change Pages for Permit, WAP, Section 12, page 29 of 68, text stating:** *“After agent decontamination, sampling is complete and determined to meet the agent free criteria for the respective furnace/unit. At that time, agent free determination is not required prior to shipment of samples to an approved offsite laboratory.”*

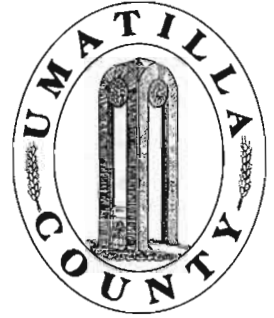
**Comment:** There is no clear purpose to the above quoted text.

**Requested Action:** Please either remove the above quoted text or add language that clearly explains its purpose.

# Umatilla County

## Department of Land Use Planning

Website: [www.umatillacounty.net/planning](http://www.umatillacounty.net/planning) • Email: [planning@umatillacounty.net](mailto:planning@umatillacounty.net)



DIRECTOR  
TAMRA  
MABBOTT

07 June 2012

LAND USE  
PLANNING,  
ZONING AND  
PERMITTING

Ms. Elizabeth Druback

CODE  
ENFORCEMENT

Eastern Region Solid and Hazardous Waste Manager  
OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY  
400 E. Scenic Drive, Suite 307

SOLID WASTE  
COMMITTEE

Pendleton, Oregon 97801

SMOKE  
MANAGEMENT

SUBJECT: TECHNICAL REPORT ON PERMIT MODIFICATION REQUEST  
UMCDF-12-010-WAST(3) TO THE UMATILLA CHEMICAL AGENT DISPOSAL  
FACILITY

GIS AND  
MAPPING

RURAL  
ADDRESSING

LIAISON,  
NATURAL  
RESOURCES &  
ENVIRONMENT

Dear Ms. Druback:

Umatilla County is submitting these public comments on Permit Modification Request (PMR) UMCDF-12-010-WAST(3) prepared by Umatilla Chemical Agent Disposal Facility (UMCDF). These comments were prepared by Tetra Tech as technical representatives of Umatilla County.

I trust that you will find this report useful and informative. Please contact me at (541) 278-6246 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tamra J. Mabbott", is written over a light blue horizontal line.

Tamra J. Mabbott, Planning Director  
Umatilla County

Enclosure

cc: Shauna Pettey, Tetra Tech



**UMATILLA CHEMICAL AGENT DISPOSAL SYSTEM  
TECHNICAL REVIEW COMMENTS ON  
PERMIT MODIFICATION REQUEST UMCDF-12-010-WAST(3)**

**UMATILLA COUNTY TECHNICAL ASSISTANCE**

**Prepared for**  
**Umatilla County**  
County Courthouse  
216 SE Fourth Street  
Pendleton, OR 97801

Contract No.	:	135-12007-11001
Date Prepared	:	June 4, 2012
Morrow County Project Officer	:	Tamra Mabbott, Planning Director
Telephone No.	:	(541) 278-6246
Tetra Tech Project Manager	:	Mike Baker
Telephone No.	:	(509) 942-6060

## 1.0 INTRODUCTION

Tetra Tech prepared this report presenting comments of its review of permit modification request (PMR) UMCDF-12-010-WAST(3), prepared by the Washington Demilitarization Company (WDC) for the U.S. Army Chemical Materials Agency Umatilla Chemical Agent Disposal Facility (UMCDF) Field Office and submitted to the Oregon Department of Environmental Quality.

## 2.0 GENERAL COMMENTS

### 1. Deficiency:

What sampling/analytical method and sampling frequency will be used for the verification of agent concentrations within each waste container?

#### Recommendation:

Provide further clarification regarding verification of agent concentrations within waste containers allowed to be shipped off-site.

### 2. Deficiency:

Is the concentration level Immediately Dangerous to Life and Health (IDLH) for multi-agent contaminated wastes and/or carbon cumulative?

#### Recommendation:

Provide further clarification regarding the IDHL for multi-agent contaminated waste and/or carbon.

### 3. Deficiency:

“At no time in this PMR is any particular waste stream called out for management specifically on-site or off-site.”

#### Recommendation:

Define management strategies for particular waste streams. At a minimum, identify waste streams to be specifically excluded from off-site treatment.

## 3.0 SPECIFIC COMMENTS

1. PMR, Justification for Modification, 6<sup>th</sup> paragraph, pg 3.

#### Deficiency:

In this paragraph, the PMR states “There are also benefits for the environment on and adjacent to the Umatilla Chemical Depot if this change is made.” While this is true for the local/regional area, this change basically just moves the risk from emissions elsewhere.

**Recommendation:**

Explain why moving the risk from one location to another without reducing the net risk, is an appropriate reason to approve this PMR.

2. PMR, Justification for Modification, 4<sup>th</sup> paragraph, pg 5.

**Deficiency:**

In this paragraph, the PMR states “It is possible that when the UMCDF receives sample results for a waste, the UMCDF may choose to decontaminate the waste, sample it again, and then package and ship it.”

**Recommendation:**

Define the protocol for the repackaging of waste containers.

3. PMR, Environmental Impact of Modification, Last paragraph, pg 5.

**Deficiency:**

The PMR states “The proposed changes transfer risk from processing and emissions to packaging and transport.” Further on the PMR states “Another immediate effect of this change is to reduce the impact of UMCDF emissions in northeast Oregon.” While this change has an obvious benefit for Umatilla and surrounding northeast Oregon, it just changes the locale where the risks take place while not really removing the risks themselves.

**Recommendation:**

Identify and provide further detail regarding the risks associated with the Treatment Storage and Disposal Facility (TSDF). What is the impact to that local area and are there any liability issues associated for the Depot with respect to the actual processing location?

4. PMR, Appendix C, Bounding Transportation Risk Analysis (BTRA), Memorandum, 5. c., pg 3.

**Deficiency:**

5. c. It is envisioned that in the majority of shipments, it may be possible to use generator knowledge in lieu of headspace monitoring for characterization of routine waste streams.

**Recommendation:**

Will generator knowledge in lieu of headspace monitoring be deemed sufficient for any particular waste streams and if so under what situations and/or conditions?

5. PMR, Appendix C, Bounding Transportation Risk Analysis (BTRA), Memorandum, 7. , pg 4.

**Deficiency:**

7. There may be a need in the future for a site to ship individual waste drums above 0.5 IDHL or exceed the negligible risk category for average drums.

**Recommendation:**

Explain how this type of situation will be addressed if it is encountered.

#### **4.0 CONCLUSIONS AND RECOMMENDATIONS**

It is recommended the PMR be revised to address the comments provided above.

In general, we support the reduction in worker safety risk, by reducing the workers' handling of waste for on-site processing through the Metal Parts Furnace.

June 4, 2012

Department of Environmental Quality  
Eastern Region Pendleton Office  
700 S. E. Emigrant Avenue, Suite 330  
Pendleton, OR 97801

Subject: Umatilla Chemical Agent Disposal Facility (UMCDF)  
Permit Modification Request UMCDF-12-010-WAST(3) (PMR 12-010)  
Proposing the Deletion of the EQC's Permit Requirement to Treat all  
UMCDF Agent-Contaminated Wastes Onsite

To whom it may concern:

Enclosed for your consideration are my public comments on the subject permit modification request. Please direct my comments to the appropriate person since the point of contact listed in the public notice for the subject PMR is no longer employed by the Department of Environmental Quality (DEQ).

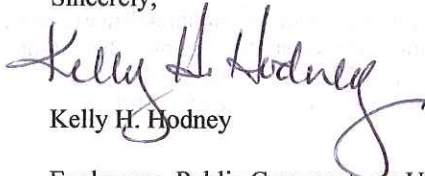
PMR 12-010 is a revision and resubmittal of the UMCDF's PMR UMCDF-11-002-WAST(3), which was withdrawn by the permittees as a result of Confederated Tribes of the Umatilla Indian Reservation and U.S. Environmental Protection Agency (EPA) comments and in lieu of the Department of Environmental Quality (DEQ) issuing a notice of deficiency (NOD). The draft NOD is documented in the DEQ's review report on PMR 11-002 (DEQ Item No. 12-0184), a copy of which was provided to the UMCDF so that the permittees would resolve the DEQ's comments in this resubmittal (i.e., PMR 12-010). However, many of the DEQ's comments and concerns are not addressed or resolved in PMR 12-010, the result of which is an incomplete permit modification request and retained deficiencies that make this PMR unapprovable as submitted.

In addition, the U.S. Environmental Protection Agency (EPA), Region 10 Office, reviewed the DEQ's draft NOD preparatory to issuance and made additional comments (DEQ Item No. 12-0139). The EPA's comments were provided to the UMCDF so the permittees would also resolve these additional issues, but PMR 12-010 ignores or does not adequately address the EPA's comments.

Based on the previous DEQ and EPA identified deficiencies and comments, PMR 12-010 is not adequately protective of human health and the environment.

The information in PMR 12-001 remains incomplete and still does not meet the 40 CFR 270.42(c)(1) requirements. Inasmuch as 40 CFR 124.3 and 124.6 require the DEQ to have a complete application before making a tentative decision and issuing a draft permit, I request that the DEQ require the UMCDF to 1) revise PMR 12-010 to resolve the outstanding DEQ draft NOD and EPA deficiencies and 2) provide the missing information and revised (i.e., complete) PMR for public review and comment before making a tentative decision to approve PMR 12-010 and/or issuing a draft permit. In addition, since the DEQ has removed the repositories and the Hermiston office is being closed, I would appreciate being notified by email ([hodney@cotnet.net](mailto:hodney@cotnet.net)) when the DEQ receives additional submittals on this PMR and when this information is available via the DEQ's CDP web page.

Sincerely,



Kelly H. Hodney

Enclosure: Public Comments on UMCDF PMR 12-010

cf: Linda Meyer, EPA Region 10  
Environmental Quality Commission

Rod Skeen, Ph.D., CTUIR  
Umatilla County

RECEIVED  
JUN - 6 2012

Dept. of Environmental Quality  
Eastern Region - Pendleton  
Item B 000060

**Comments on UMCDF PMR UMCDF-12-010-MISC(3)  
Proposing the Deletion of the EQC's Requirement to Treat all Agent-Contaminated Wastes Onsite and the  
Offsite Shipment of Agent-Contaminated Wastes**

#	Reference	Comment
1.	General Comment	Permit Modification Request (PMR) UMCDF-12-010-MISC(3) is the UMCDF's second attempt to revise its hazardous waste permit to delete the EQC-ordered permit condition that requires the UMCDF to treat all agent-contaminated wastes onsite and to only ship agent-free wastes. Because so many of my comments are the result of the UMCDF's failure to address the deficiencies identified by the DEQ's in its draft notice of deficiency (NOD) on PMR UMCDF-11-000-MISC(3), a copy of which is not available via the DEQ's Chemical Demilitarization web page, I am attaching a copy for the benefit of the letter copy recipients.
2.	General Comment – PMR Contradicts the EQC's Best Available Technology (BAT) Determination	<p>The Environmental Quality Commission (EQC) is required to determine the best available technology (BAT) for treatment of hazardous wastes. The DEQ and EQC recently reevaluated the BATs for agent-contaminated secondary wastes and carbon, and determined the BAT for both was on-site treatment in the UMCDF's incinerators. At the time of the DEQ's reevaluation, the Army had submitted its bounding TRA and carbon addendum to the DEQ in support off-facility shipment. Nevertheless, the DEQ and EQC found – in two separate evaluations – that the BAT to be onsite incineration for all agent-contaminated secondary wastes. Off-facility shipment was one of the options evaluated in the BATs, but the DEQ recommended, and the EQC decided, that on-site incineration is the BAT for all UMCDF agent-contaminated secondary wastes – not off-facility shipment.</p> <p>Why then, is the UMCDF proposing in this PMR the off-facility shipment of agent-contaminated wastes in contradiction of the DEQ and EQC's BAT determinations? Why is the DEQ even considering this PMR before it has evaluated, and presented to the public and EQC, a new BAT recommendation that reverses its previous findings and is now in favor of off-facility shipment of agent-contaminated wastes? There is no explanation for a change in the BAT, especially since the Army's TRAs were included in the DEQ/EQC's BAT reevaluations (e.g., DEQ Item #10-0106), and the DEQ/EQC still found that onsite treatment was the BAT.</p> <p>It appears the UMCDF and DEQ have the cart before the horse, so to speak. If the DEQ is now considering switching its position and supporting the Army's original desire to ship its wastes instead of treating them onsite as required by the EQC in Permit Condition II.B.2, then the DEQ and EQC should first determine whether off-facility shipment is now the BAT instead of onsite incineration. Then, if the BAT is changed, the UMCDF's PMR 12-010 could be evaluated for consistency with the revised BAT limitations and whether it is adequately protective of human health and the environment.</p> <p>In order to have complete information available to the public for review of this PMR, please provide a copy of the DEQ and EQC's new determination that offsite shipment of agent-contaminated wastes is the BAT. The options considered, the types of wastes, the limitations, etc. in the BAT are essential to a complete review of the changes proposed in this PMR. If the EQC has not made a new BAT determination for the treatment of agent-contaminated secondary wastes, then I request that the DEQ delay any tentative or final decision to approve this PMR until after the DEQ's staff report recommending a new BAT has been issued and made available to the public and the EQC has made a final decision. The DEQ and public cannot adequately review this PMR without this information.</p>
3.	General Comment – No Environmental Impact Statement (EIS)  DEQ Draft NOD Item 10	<p>The Permittees still have not provided a copy of the EIS required under the National Environmental Policy Act (NEPA) to address the off-facility shipment of agent-contaminated wastes (DEQ draft NOD Item #10). This is a carryover deficiency from PMR 11-002. Please require the UMCDF to prepare an EIS for the off-facility shipment of UMCDF agent-contaminated wastes and provide a copy to the public and DEQ for review as part of this PMR.</p> <p><u>Note:</u> A copy of the DEQ's draft NOD is attached for reference.</p>
4.	PMR Appendix D, CDC review of the bounding TRA  DEQ draft NOD Item 14	The PMR is still incomplete. As noted in the DEQ's draft NOD on PMR 11-002, the CDC's review of the Bounding TRA predates the version of the Bounding TRA submitted in this PMR. As stated in the draft NOD, please require the UMCDF to submit a complete PMR: "Provide a copy of the BTRA that the CDC reviewed, or provide an acceptable explanation as to why the CDC letter predated the BTRA contained in this PMR. If the BTRA was updated after the CDC review, provide a copy of that BTRA and the CDC's evaluation of that final version of the BTRA."

#	Reference	Comment
5.	PMR Appendix E, Carbon Addendum  DEQ draft NOD Item 15	<p>The PMR is still incomplete. The CDC review of the carbon addendum still was not provided. This deficiency was identified in PMR 11-002 in the DEQ's draft NOD Item #15.</p> <p>Please require the UMCDF to submit a complete PMR for DEQ and public review that includes the CDC's review and evaluation of the Army's carbon addendum to the Bounding TRA.</p>
6.	PMR Appendix J, Items 1 and 2, Condition II.B.2 and II.B.3 changes	<p>The rationale provided for these changes is incorrect. The National Research Council (NRC) was contracted and paid by the U.S. Army to conduct studies to support shipping agent-contaminated wastes offsite instead of treating them onsite (Contract No. W911-NF-06-C-0067). The NRC's report supported the Army's desire to ship agent-contaminated wastes off facility to a commercial incinerator under certain conditions, but did not recommend changes to the UMCDF's permit.</p> <p>Please require the UMCDF to provide a factually correct basis for these changes.</p>
7.	PMR Appendix J, Item 6, WAP Section 12  DEQ draft NOD Item 58	<p>The PMR is still incomplete. The new requirements proposed for addition to WAP Section 12 are still not described or identified and no rationale is provided to identify the basis for or to otherwise support the various new requirements, or lack thereof. This is a carryover deficiency from PMR 11-002, which was identified by the DEQ in the draft NOD on PMR 11-002 (DEQ Item No. 12-0184) in Item No. 58. As stated previously by the DEQ:</p> <p><i>"However, none of these changes were delineated in the table of changes, and only three summary statements . . . were provided to justify all of the most significant changes in the PMR. The table of changes does not provide the information necessary for the DEQ to determine whether the proposed changes are protective of human health and the environment, are based on defensible data, etc. Not identifying the individual changes to Section 8 [now Section 12] and not providing a rationale to provide a basis to support an approval does not meet the 40 CFR 270.42(c)(1) permitting requirements."</i></p> <p>Please require the UMCDF to meet the 40 CFR 270.42(c)(1) requirements by submitting a complete PMR that identifies each new requirement in Section 12 and how each is protective of human health and the environment, is adequate for accurate characterization of the waste, is based on defensible data, etc.</p>
8.	PMR Appendix L, WAP Change Pages, Section 12, 1 <sup>st</sup> and 7 <sup>th</sup> paragraphs  DEQ draft NOD Item #s 2 and 7	<p>"Regardless of requirements elsewhere in this document, as allowed by Permit Condition II.B.2, any material which complies with the <i>Bounding Transportation Risk Assessment for &gt; 1 Vapor Screening Level (VSL) Waste (CMA, 2008)</i> [the bounding TRA] or the <i>Addendum to the Bounding TRA Assessment of Risk from Offsite Shipment of Spent Carbon (CMA 2009)</i> [the carbon addendum] may be shipped for off-site disposal at a RCRA Subtitle C TSDF. The criteria in this section apply to all waste streams destined for offsite disposal at a RCRA Subtitle C TSDF."</p> <ul style="list-style-type: none"><li>• Please strike the "Regardless of requirements elsewhere in this document, as allowed by Permit Condition II.B.2..." This open-ended language would allow the UMCDF to disregard the sampling and analysis requirements and any other existing permit requirements that are also applicable to agent-contaminated wastes that may be shipped off facility.</li><li>• The DEQ has historically required the UMCDF to specify the requirements within the permit itself rather than referring to an Army document. Please require the UMCDF to add the specific requirements for off-facility shipment of agent-contaminated wastes to the WAP instead of referencing the Army's TRAs.</li><li>• If, instead, the DEQ is going to depart from its established UMCDF permitting practices and cross-reference an Army document that is outside of the DEQ's control:<ul style="list-style-type: none"><li>○ Please revise the cross-references to specify the full date of issuance for each document (e.g., September 2008) so that a different version than what was presented in this PMR is not used (just like a different version was apparently provided to the CDC for its review than what was submitted in the PMR – see comment #4).</li><li>○ Since many of the assumptions upon which the TRAs are based and calculated, as well as other requirements for shipment of agent-contaminated wastes, are contained within the appendices to the TRAs, please revise this paragraph to specify that the cross-referenced requirements include all appendices and attachments to the TRAs.</li></ul></li><li>• As written, this paragraph implies, and paragraph 7 explicitly states, agent-contaminated wastes may be shipped to a RCRA Subtitle C disposal facility. This is not supported by the NRC, CDC, nor the TRAs. Please revise to specify a RCRA Subtitle C incinerator treatment facility.</li></ul>

#	Reference	Comment
9.	PMR Appendix L, WAP Change Pages, Section 12 – Omitted Requirement  DEQ draft NOD Items 3 and 11,	<p>Page 4 of the PMR acknowledges the CDC's condition of acceptance of the Army's BTRA; however, the UMCDF did not include the condition of acceptance in the WAP. The Army's BTRA limits the concentration of the vapor in the headspace in the waste containers to an <u>average for each shipment</u> of no higher than 0.5 of the level considered immediately dangerous to life and health (IDLH); whereas the CDC stated the limit should be 0.5 IDLH for <u>each</u> waste container.</p> <p>The validity of the CDC's limitation was acknowledged by the Army in a September 15, 2008, letter from Mr. Conrad F. Whyne, Director, U.S. Army Chemical Materials Agency (CMA). From the DEQ's PMR 11-002 review report (DEQ Item No. 12-0184):</p> <p style="padding-left: 40px;">"In addition to the shipping requirements listed above, Mr. Whyne also stated that the CDC recommended a ceiling value of 0.5 IDLH for any individual drum even though the BTRA may allow for higher concentrations in individual drums with negligible shipping risk. He then stated:</p> <p style="padding-left: 80px;"><i>The CDC recommendation to establish a 0.5 IDLH ceiling is accepted and shall be implemented . . . "</i></p> <p>Please require the UMCDF to revise the WAP to comply with the CDC's and CMA's limitation of 0.5 IDLH for <u>each</u> waste container.</p>
10.	PMR Appendix L, WAP Change Pages, Section 12 – Omitted Requirement  DEQ draft NOD Items 3 and 11,	<p>The Army CMA has determined that additional conditions beyond those described in the BTRA and carbon addendum are necessary prior to shipping greater than 1 VSL agent-contaminated waste when using the BTRA in lieu of a site-specific TRA, which is what PMR 12-010 proposes. These are outlined in the September 15, 2008, letter from Mr. Conrad F. Whyne, Director, U.S. Army CMA. These additional requirements were evaluated by the DEQ in its review of PMR 11-002 (DEQ Item No. 12-0184, pages 8 through 10). However, the UMCDF has not included the CMA's requirements in the WAP as enforceable requirements.</p> <p>Please require the UMCDF to revise the WAP to:</p> <ol style="list-style-type: none"> <li>1. Include the CMA's (Mr. Whyne's) additional shipment requirements, except those noted by the DEQ as contradicting the NRC's, CDC's, and BTRA (e.g., Items a and e from the table on pages 8 through 10 of the review report), which should be modified to conform with the applicable source document; and</li> <li>2. Incorporate the DEQ's clarifications and requirements as outlined in DEQ Item No. 12-0184.</li> </ol>
11.	PMR Appendix L, WAP Change Pages, Section 12, 2 <sup>nd</sup> paragraph  DEQ draft NOD Item 64	<p>"Samples will be considered compliant if they are below the extractive analysis or headspace monitoring acceptance criteria identified in this section."</p> <p>This proposed requirement is unclear. What samples? Compliant with what and why are only the samples considered compliant?</p> <p>In addition, Section 12 does not identify what the sampling requirements will be for agent-contaminated wastes that will be shipped off facility. Section 2 and Table 2 has sampling requirements for wastes destined for off-facility shipment, but:</p> <ol style="list-style-type: none"> <li>1) Section 12 does not indicate if these are the sampling requirements for agent-contaminated wastes,</li> <li>2) Except for wood, which allows air samples, the Table 2 sampling requirements are limited to extractive sampling and do not include any headspace sampling requirements,</li> <li>3) Section 2 and Table 2 do not include all the waste streams the UMCDF now intends to ship off-facility, and</li> <li>4) Except for spent carbon that will not be treated onsite, which was recently updated, the existing WAP sampling requirements are inadequate for the offsite shipment of highly-contaminated wastes. The existing Table 2 sampling requirements are primarily applicable to the HD ton container campaign and/or wastes with low levels of agent exposure. This PMR did not update the WAP to include initial and confirmational sampling requirements for the wastes with high levels of contamination that were previously required to be treated onsite, but are now proposed for off-facility shipment. This is a significant change in the types of wastes being shipped off-facility and the waste management process, and the waste characterization sampling requirements should have been identified and revised accordingly.</li> </ol> <p>PMR 11-002 proposed the addition of the new sampling requirements to Table 2 for wastes that will be eligible for off-facility shipment under Section 12 (i.e., that are currently required to be treated on site and, therefore, have no established sampling or analysis requirements for off-facility</p>



#	Reference	Comment
		<p>wastes (modified for the different off-facility shipment criteria), or to provide a basis for the omission of these requirements from Section 12.</p> <ul style="list-style-type: none"> <li>Due to their nature, porous wastes should always require extractive analysis unless the UMCDF has documentation to demonstrate the waste has never been exposed to agent. In such a case, the definitions of the WAP already allow the UMCDF to declare this waste to be agent free without sampling and would be shipped off-facility in accordance with Section 8, not Section 12. Therefore, please require the UMCDF to revise this section to always require extractive analysis for porous agent-contaminated wastes. (DEQ NOD Item #68)</li> </ul>
13.	<p>PMR Appendix L, WAP Change Pages, Section 12, 4<sup>th</sup> paragraph</p> <p>DEQ draft NOD Items 7, 11, 12, 20, 60, 61, 66, 67, 68, 69</p>	<p>"Other materials may be checked using headspace monitoring or process knowledge that the waste complies with headspace monitoring limits. Headspace monitoring results will be obtained by placing the waste in an enclosure of appropriate volume (e.g., container) for a sufficient period of time to ensure a representative sample is obtained. Samples will be considered compliant if they are less than 500 VSL for GB and 117 VSL for HD are obtained through monitoring by DAAMS. VX contaminated <i>[sic]</i> waste, other than carbon, will not be shipped offsite<del>[sic]</del>."</p> <ul style="list-style-type: none"> <li>"Compliant" – See comment #11 about the need to clarify this requirement.</li> <li>"Other materials" – The purpose of the WAP is to characterize wastes, not "materials." For clarification and consistency with the rest of the WAP, please request the UMCDF to change this to "nonporous wastes." All other uses of "materials" in the proposed new Section 12 should also be corrected to "wastes."</li> <li>In addition, please require the UMCDF to further revise this section to specify which agent-contaminated wastes are excluded from off-facility shipment per the NRC's recommendation and the DEQ's draft NOD Item #s 7, 11, 12, and 67.</li> <li>"Other materials may be checked . . ." The wastes are not being "checked" but are being characterized by means of headspace sampling. Please require the UMCDF to revise the requirement for accuracy and clarity.</li> <li>Provide the basis for the proposed headspace sampling analytical criteria, and what data is available documenting these levels are appropriate for all nonporous wastes.</li> <li>The proposed language does not address DEQ draft NOD Item #69 inasmuch as it still does not incorporate all of the sampling requirements currently required in Section 8 for the off-facility shipment of agent-free wastes. For example, the deletion of the following requirements:</li> </ul> <p>... analytical results will be recorded as concentration in units of parts per billion (ppb). Analytical results below the PCC, but greater than 0.5 PCC, will be flagged as estimates. All analytical results will be recorded with decimal places truncated; rounding will not occur."</p> <p>Please require the UMCDF, at a minimum, to establish appropriate data recording and reporting requirements and to add the same requirements as they are currently required to meet for off-facility shipment of agent-free wastes (modified for the different off-facility shipment criteria), or to provide a basis for the omission of these requirements from Section 12.</p> <ul style="list-style-type: none"> <li>Because of the definitions in the permit, as the UMCDF has written Section 12, the UMCDF will only be allowed to ship agent-contaminated wastes elsewhere on the Depot – not to Port Arthur, Texas, as intended. This is a carryover deficiency from PMR 11-002. For consistency, please require the UMCDF to revise Section 12 to allow the "<b>off-facility</b>" shipment of wastes or revise the WAP and all other instances in the permit to redefine offsite and off-facility shipment. See DEQ draft NOD Item #20.</li> <li>This PMR is still incomplete and deficient in that the UMCDF has not incorporated the specific headspace sampling requirements/procedure into the permit. This is a carryover deficiency from PMR 11-002 – see DEQ draft NOD Item #s 7 and 66. Submitting this PMR without the headspace sampling procedure, which is a new sampling method<sup>1</sup>, for DEQ and public review makes the PMR incomplete and does not meet the OARs 340-100-0021 and 340-102-0011</li> </ul>

#	Reference	Comment
		<p>shipment). However, PMR 12-010 did not add these waste streams to Table 2, nor did the UMCDf add sampling requirements for the shipment of &gt;1 VSL-contaminated wastes.</p> <p>Please require the UMCDf to revise this new Section 12 to be consistent with the rest of the WAP, e.g., "All off-facility wastes must be sampled in accordance with Table 2. The waste will be considered to have met the off-facility shipment requirements if the analytical results of the samples meet the acceptance criteria in this section."</p> <p>Please also require the UMCDf to revise Section 2 and Table 2 to specify the initial and confirmation waste sampling requirements (type and frequency), for both extractive and headspace sampling, as applicable, for agent-contaminated wastes destined for off-facility shipment. The existing characterization sampling requirements were for munitions treatment operations and assumed agent-contaminated wastes would be treated in the UMCDf's incinerators and have a fairly consistent post-incineration composition. However, since the UMCDf is proposing shipping highly contaminated wastes off facility and will not first be treating them onsite, the as-found condition of these wastes are likely to widely differ. Therefore, the existing WAP waste characterization sampling requirements are not applicable or adequate for this new waste management strategy. Some of the existing requirements would allow the UMCDf to not have to sample and confirm the agent concentrations in some of the waste streams for up to a year.</p> <p>In addition, existing deficiencies in the WAP need to be remedied. Some of the waste streams have no post-stockpile treatment operations agent confirmation sampling requirements. For example, currently the only MPF ash sampling agent confirmation sampling requirements are for HD ton containers – the WAP has not been updated with the agent-confirmation requirements for the nonstockpile waste treatment wastes currently being treated in the MPF; i.e., the UMCDf is not currently required to sample the MPF ash to verify the dismantled equipment and wastes exiting the MPF are agent free before sending them off facility.</p>
12.	<p>PMR Appendix L, WAP Change Pages, Section 12, 3<sup>rd</sup> paragraph</p> <p>DEQ draft NOD Items 68, 69</p>	<p>"Porous materials (for example <i>[sic]</i> carbon or wood) require extractive analysis or process knowledge that the waste complies with extractive analysis limits. Extractive analysis results will be considered compliant if they are below 13.4 ppm for VX, 0.4 ppm for GB, and 77.7 ppm for HD by weight. Extractive analytical results will be recorded as concentration in units of parts per billion (ppb). All analytical results will be recorded with decimal places truncated; rounding will not occur."</p> <ul style="list-style-type: none"> <li>As written, this would create a conflict within the WAP. Section 2.2.7 allows the use of air sampling to characterize wood pallets under certain conditions. Suggest requiring the UMCDf to rephrase this to read: "Except as allowed by Section 2.2.7, porous material wastes (for example, carbon or wood), require extractive analysis or process knowledge that the waste complies with extractive analysis limits."</li> <li>"Compliant" – See previous comment #11 about the need to clarify this requirement.</li> <li>Provide the basis for the extractive analysis off-facility shipment criteria proposed for porous wastes, and what data is available documenting these levels are appropriate for all porous wastes, including, but not limited to, carbon. It does not seem likely that the different levels of contamination allowed for carbon, due to its propensity to entrap and retain the agent, would be appropriate for other porous wastes that would release the agent more readily.</li> <li>The proposed language does not address DEQ draft NOD Item #69 inasmuch as it still does not incorporate all of the sampling requirements currently required in Section 8 for the off-facility shipment of agent-free wastes. For example, the following was copied from Section 8, but the highlighted sentence was deleted (corresponds with the last two sentences of the proposed paragraph above): <p>Extractive analytical results will be recorded as concentration in units of parts per billion (ppb). <b>Analytical results below the PCC, but greater than 0.5 PCC, will be flagged as estimates.</b> All analytical results will be recorded with decimal places truncated; rounding will not occur."</p> </li> </ul> <p>Please require the UMCDf to establish and justify appropriate data reporting requirements for the extractive analytical results and to add and comply with, at a minimum, the same requirements as they are currently required to meet for off-facility shipment of agent-free</p>

#	Reference	Comment
		<p>requirements for DEQ review and approval of non-EPA methods.</p> <p>From OAR 340-102-0011:</p> <p>“(A) Testing the waste according to the methods set forth in <b>Subpart C of 40 CFR 261</b>, or according to an equivalent method approved by the Department under OAR 340-100-0021.</p> <p><b>NOTE: In most instances, the Department will not consider approving a test method until it has been approved by EPA.</b>” [emphasis added]</p> <p>The headspace monitoring procedure should include the NRC’s specific test condition requirements such as maintenance of a minimum temperature of 70°F, tenting requirements, minimum period of time for the waste to vent into the tented area before sampling, the minimum sampling period, the type of agent air monitor(s) to be used, etc. These are sampling requirements that are not part of the analytical methods cross-referenced in the last paragraph of Section 12 (see Comment #17). The UMCDf’s statements that it “is planning” follow these NRC recommendations as outlined in PMR Appendix F are not enforceable and noticeably absent from the proposed WAP requirements. The UMCDf presents the controls listed in Appendix F as part of what will make transportation an acceptable risk. To be protective of human health and the environment, this new sampling method, if approved, should be enforceable and included in the permit so that it cannot be changed without DEQ approval via a permit modification request.</p> <p>In accordance with OAR 340-100-0021, Please require the UMCDf to provide the new sampling method – the headspace sampling procedure - for DEQ and public review. Please also provide the CDC’s review and evaluation of the adequacy of the proposed headspace sampling procedure as required by the Permit Condition II.E.5 Independent Oversight Program (see DEQ’s draft NOD Item #66).</p> <ul style="list-style-type: none"> <li>• Provide the basis for the selection of DAAMS monitors only, and not also the use of co-located ACAMS which would identify if the waste being sampled exceeded the acceptance criteria at any point during the sampling period possibly due to shifting or settling of the waste, etc. which could indicate an occluded space in which agent has been trapped.</li> <li>• Please require the UMCDf to provide the basis for the use of VSL instead of a CDC promulgated airborne exposure limit as the pass criteria. This is a carryover deficiency from PMR 11-002 - see DEQ draft NOD Item #61. VSL was not promulgated by the CDC, but is an Army-specific air exposure limit that is independent of time (see Permit Table 1-1). The CDC has also previously requested the Army to provide public-health based justification for VSL as pass criteria (e.g., DEQ Item Nos. 10-1125, 11-0233).</li> <li>• Process knowledge – see other comments regarding the unprotectiveness of the UMCDf’s proposed limitless use of process knowledge in lieu of sampling. This is a failure to address DEQ draft NOD Item # 68. The UMCDf still has not provided “any data or other information to support this change. This is contradictory to the NRC’s recommendations. Also, as written, this does not provide a measurable compliance point, would create an unenforceable permit requirement, and would supersede (negate) the existing WAP sampling and analysis requirements.” Please require the UMCDf to provide the data or other information to support the use of process knowledge to send agent-contaminated wastes off facility despite the NRC’s recommendation not to do so (see DEQ Item No. 12-0184). Also, please require the UMCDf to either 1) define the specific conditions under which the existing DEQ-required minimum agent sampling requirements may be discarded in favor of process knowledge or 2) to limit the use of process knowledge to “as specifically allowed elsewhere in this WAP” (i.e., the use of process knowledge already accepted by the DEQ as protective because an upstream waste has already been sampled and found to meet the off-facility shipment criteria).</li> </ul> <p><sup>1</sup> From the EPA’s website (<a href="http://www.epa.gov/osa/fem/methcollectns.htm">http://www.epa.gov/osa/fem/methcollectns.htm</a>): “Test methods are approved procedures for measuring the presence and concentration of physical and chemical pollutants; evaluating properties, such as toxic properties, of chemical substances; or measuring the effects of substances under various conditions.”</p>

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14.	PMR Appendix L, WAP Change Pages, Section 12, 5 <sup>th</sup> paragraph	<p>"After agent decontamination, sampling is completed and determined to meet the agent free <i>[sic]</i> criteria for the respective furnace/unit. At that time, agent free <i>[sic]</i> determination is not required prior to shipment of samples to an approved offsite laboratory."</p> <p>Please have the UMCDF delete this paragraph. It is out of place, it pertains to more than just off-facility shipment activities, and should be addressed in the UMCDF's closure plan PMR (UMCDF-09-006-CLOS[3]), not this PMR.</p>
15.	PMR Appendix L, WAP Change Pages, Section 12, 6 <sup>th</sup> paragraph  DEQ draft NOD Item 68	<p>"Process knowledge or generator knowledge (e.g., no exposure in an agent environment, maintaining the furnace at a temperature of at least 1,000°F for a minimum of 15 minutes after the last waste feed) allow for an agent free <i>[sic]</i> determination without analysis being preformed <i>[sic]</i>."</p> <p>No rationale is provided for the use of 1,000°F for 15 minutes as a basis to omit the WAP-required waste sampling requirements for any or all UMCDF wastes. This criteria has only been approved for the refractory brick within the furnaces themselves, not agent-contaminated wastes fed to the furnaces nor other furnace components which have been demonstrated at the UMCDF to have occluded spaces in which agent has been trapped. During the secondary waste trial burn the UMCDF demonstrated that all secondary wastes require far longer than a 15-minute residence time to achieve agent free – up to 3 hours 17 minutes. Linked with this, the ACAMS monitoring in the Metal Parts Furnace discharge airlock is not adequate to ensure decontamination has been achieved after only a 15-minute residence time. During the HD ton container campaign there were a number of ton containers that did not trigger a 0.2 VSL alarm in the DAL, but were sampled and found to exceed the agent-free criteria (or would have if the laboratory had not changed the DEQ-approved SOPs and/or inappropriately manually integrated the data in order to get agent-free results). Further, there have been ton containers that had to be sent back to Zone 3 of the furnace because of ACAMS alarms in the DAL. Some of these alarms were refuted by DAAMS analysis while the ton containers were still in Zone 3, but when the ton containers were released from Zone 3 back into the DAL, the ACAMS alarmed again and were subsequently confirmed by DAAMS. So, DAL monitoring in lieu of extractive sampling is not a reliable or representative means of sampling the wastes.</p> <p>More to the point, as worded, this paragraph is applicable to the WAP Section 8 agent-free waste requirements and should be deleted from Section 12. If the waste is agent free it can be shipped off facility in accordance with Section 8.</p> <p>PMR 12-010 still does not address DEQ draft NOD Item 68 regarding the proposed unrestricted use of generator or process knowledge for the off-facility shipment of agent-contaminated wastes. Providing a list of examples does not limit or otherwise specify when process knowledge may be used. The DEQ has historically required the UMCDF to specifically identify the criteria and under what specific circumstances process knowledge may be used for the off-facility shipment of agent-free wastes (e.g., conditioned on wastes sampled upstream to first meet the shipment criteria). To allow the unrestricted use of process knowledge now for off-facility shipment of agent-contaminated wastes would not be protective of human health and the environment.</p> <p>Please require the UMCDF to resolve the deficiencies identified by the DEQ (DEQ draft NOD Item #68) by deleting this paragraph and all other instances of the use of process knowledge in lieu of extractive or headspace sampling and analysis, or revise Section 12 and Table 2 "to limit the use of process knowledge to 'as specifically allowed elsewhere in the WAP.'" (DEQ draft NOD Item #68)</p>



#	Reference	Comment
16.	PMR Appendix L, WAP Change Pages, Section 12, 7 <sup>th</sup> paragraph  DEQ draft NOD Item 1	<p>"All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for disposal to a RCRA Subpart C disposal facility."</p> <ul style="list-style-type: none"> <li>The Army's carbon TRA is based on assumptions made in the bounding TRA. Therefore, please require the UMCDF to revise this sentence to state, "All waste meeting the bounding TRA or <b>and</b> the carbon addendum criteria . . ." in order to be protective of human health and the environment.</li> <li>Please have the UMCDF specify that it must comply with the carbon addendum Table 2 requirements (not just Table 1).</li> <li>The UMCDF has acknowledged and accepted the validity of the CTUIR's TRAs both in PMR 11-002 and this PMR. The CTUIR conditioned its TRAs on certain requirements (see CTUIR letter dated April 4, 2012) being met for each shipment and containers. In order to ensure the protection of human health and the environment; as well as to meet the Environmental Quality Commission's original intent to address the public and CTUIR's concerns regarding the transport of agent-contaminated wastes over state and tribal lands when it originally added the permit condition that prohibited the off-facility shipment of agent-contaminated wastes (see DEQ draft NOD Item #1), please require the UMCDF to either provide a comparison of the Army's TRA bounding conditions with the CTUIR's requirements to verify they are all included in the Army's TRAs, or revise Section 8 to require not only the Army's TRA requirements to be met, but also the CTUIR's TRA requirements.</li> <li>To comply with the NRC, CDC, and TRAs, please require the UMCDF to revise this sentence to state that the wastes may be shipped off facility to be treated in a RCRA Subpart C incineration treatment facility.</li> <li>See other comments regarding the replacement of the incorrect term "offsite" with the correct term (as defined in the WAP) "off facility."</li> </ul>
17.	PMR Appendix L, WAP Change Pages, Section 12, 8 <sup>th</sup> paragraph  DEQ draft NOD Items 7, 65, and 66	<p>"The sample matrix determination will be made in accordance with UMCDF standing operating procedure (SOP) UM-000-M-559, "Agent Extraction &amp; Analyses." If the process stream is not listed, the matrix the sample most resembles will be used (e.g., soils fall under the water-insoluble solid matrix). Sample extractive analysis will be performed in accordance with UM-000-M-559, "Agent Extraction &amp; Analyses." Headspace monitoring analysis will be performed in accordance with UMCDF SOP UM-0000-M-556, "DAAMS GC/FPD Analysis" and UM-0000-M-557, "DAAMS GC-MSD/FPD Analysis."</p> <p>This information was added in response to DEQ draft NOD Item # 65.</p> <ul style="list-style-type: none"> <li>This was copied from Section 8. However, soil is no longer a good example of a matrix that is not specifically identified in SOP 559, because SOP 559 now contains a specific HD technique sheet for sand, which is the composition of the area soils. Please require the UMCDF to provide an appropriate example. Section 8 of the WAP should be corrected too.</li> <li>If ACAMS monitoring is added (see Comment #13), please require the UMCDF to include the ACAMS analytical SOP.</li> <li>The analytical SOPs listed are the DEQ-approved non SW-846 analytical methods. However, the UMCDF acknowledges these are only the analytical procedures. The headspace sampling procedure, which is a new sampling method, needs to be submitted as part of this PMR for both DEQ and public review, should include all of the NRC's recommendations, and should be added to the permit (see Comment #13). When the UMCDF elects to not use the standard EPA methods in SW-846, which cannot be changed except by the EPA, the DEQ has always added the site-specific laboratory procedures and plans to the permit so that the methods and requirements cannot be changed without DEQ approval via a PMR. This ensures the continued protection of human health and the environment. Please require the UMCDF to add the headspace sampling procedure to the permit like all the other site-specific non-SW-846 methods.</li> </ul>
18.	PMR Appendix L, WAP Change Pages, Section 12, Omitted Requirement  DEQ draft NOD Item 11	<p>The UMCDF's PMR proposes the off-facility transport of multiagent-contaminated wastes and shipments based solely on the Army's own evaluation as to whether the risk is acceptable, but this is not addressed in WAP Section 12. Page 5 of the PMR states that the BTRA allows for shipment of drums containing multiagent-contaminated wastes:</p> <p><i>"... <b>may</b> [emphasis added] be acceptable for shipment, but will be addressed on a site-specific basis. To maintain compliance with the bounding TRA, UMCDF has discussed this with CMA and been directed that plans for the shipment of any multi-agent [sic] wastes or shipments containing more than one agent type would be submitted to the</i></p>

#	Reference	Comment
		<p><i>CMA risk assessors. Risk, on a shipment-by-shipment basis, would be assessed to assure it remains within the low risk category."</i></p> <p>As previously identified, (DEQ's draft NOD Item 11):</p> <p><i>"The objectives of the BTRA were to evaluate the conditions under which the waste could be shipped with acceptable risk and to provide a detailed assessment of the public risk associated with an accident during transport to a TSDF. If a site wanted to ship waste that was outside the bounds of the TRA (e.g., higher level of agent contamination or greater number of shipments), then the BTRA risk assessment would no longer be applicable."</i></p> <p>One of the bounding conditions of the BTRA is that <i>"Only one agent type will be present in each drum and on each shipment..."</i> (DEQ Item 12-0184, page 11).</p> <p>Therefore, since the BTRA's bounding condition is to single-agent contaminated wastes and shipments (i.e., it does not assess the risk of transport of multiagent-contaminated wastes or shipments), the UMCDF could not ship multiagent-contaminated wastes and comply with the BTRA. The UMCDF would be violating the BTRA bounding conditions with which it proposes to comply (WAP Section 12) if it sends multiagent-contaminated wastes and/or shipments off facility.</p> <p>Because the UMCDF did not include the single-agent shipment limitation in the WAP but states in the PMR that it intends to ship multiagent-contaminated wastes based solely on an self-evaluation, the UMCDF could possibly ship the maximum amount of agent allowed for each of the three chemical agents in one shipment – instead of in separate shipments, which is how the risk has been assessed by the Army, CDC, and CTUIR. None of the assessments have evaluated the cumulative/additive risk of multiagent-contaminated waste shipments, and the UMCDF did not provide any information or data to support DEQ preapproval of multiagent-contaminated waste shipments despite the DEQ's request that they do so.</p> <p>The UMCDF did not resolve the PMR 11-002 draft NOD Item #11, which directed the UMCDF, if it wished to pursue the shipment of multiagent-contaminated wastes, to <i>"... provide the information regarding the circumstances that would necessitate such an occurrence and how many shipments the UMCDF anticipates. Further, since this type of shipment is not covered under the BTRA, revise the WAP to require the UMCDF to prepare a shipment-specific TRA and to require, on a shipment-by-shipment basis, written Department concurrence for shipping more than one agent type per shipment."</i> This information was not provided, and the proposed WAP Section 12 did not include the DEQ approval requirement.</p> <p>The DEQ previously identified in its NOD on PMR 11-002 that shipments outside of the TRAs' bounding conditions (e.g., above &gt;0.5 IDLH), without CDC and DEQ review and approval are unacceptable (see DEQ draft NOD Item #1), and require development of a site-specific TRA. Shipment of multiagent-contaminated wastes is also outside the bounding conditions; and should also be unacceptable.</p> <p>The Army is requesting the DEQ to approve multiagent-contaminated shipments without first evaluating the protectiveness to human health and the environment. This is unacceptable. To approve multiagent-contaminated shipments without first evaluating the risk to human health and the environment, the DEQ would be abandoning its responsibility to issue a permit that protects the state of Oregon residents and environment. Any agent-contaminated shipment outside of the WAP requirements should require a PMR so that the public may review and comment on the proposal. The UMCDF chose to ignore the DEQ's deficiency comment and did not identify the conditions and limitations of multiagent-contaminated shipments; therefore, multiagent-contaminated waste shipments should be prohibited until the UMCDF submits a PMR for DEQ and public review.</p> <p>Please require the UMCDF to revise the WAP to limit off-facility shipments to only one agent type in each drum and on each shipment consistent with Section 2.3 of the BTRA.</p>
19.	General Comment – PMR 11-002 draft NOD comments not resolved in PMR 12-010	<p>The UMCDF withdrew PMR 11-002 (predecessor to this PMR 12-010) with the intent to revise and resubmit it. The DEQ provided the permittees copies of the DEQ's review report and draft NOD as well as the EPA's comments on the DEQ's draft NOD on PMR 11-002. These documents were provided so that the UMCDF would resolve the identified deficiencies in its resubmittal (i.e., PMR 12-010). The UMCDF should be commended for addressing the DEQ's comments denying</p>

#	Reference	Comment
		<p>revisions to the permit that were outside the scope of off-facility shipment of agent-contaminated wastes. However, it appears the UMCDF has not addressed the majority of the NOD items, nor the EPA's comments, germane to off-facility shipment.</p> <p>Please require the UMCDF to revise and resubmit this PMR to resolve the EPA's comments and the DEQ's draft NOD Item Nos. (a brief synopsis of each unresolved NOD item follows):</p> <ul style="list-style-type: none"> <li>• 2 – Add the commitments made by the UMCDF in Appendix F for off-facility transportation; i.e., "The UMCDF is planning to institute...", to the WAP as measurable requirements.</li> <li>• 3 – Incorporate the CDC's 0.5 IDLH per container limit, and add the total mass per truckload limitations to the WAP as an enforceable condition.</li> <li>• 5 – Due to the deficiencies in the carbon treatability study (CTS), the DEQ did not accept the UMCDF's assertion that CTS results answered the NRC's recommendation to segregate mercury-contaminated carbon from other carbon and to evaluate and select appropriate methods for the treatment and disposal of mercury-contaminated carbon. Please require the UMCDF to provide the information requested in this NOD item to resolve the NRC's Recommendation 3-5.</li> <li>• 6 – Since the methods for agent-free sampling of carbon had to be revised before the DEQ approved them in 2011, the UMCDF did not have a valid method for the 2007 carbon studies to have made the determination the carbon was agent free. As noted in the PMR 09-012 conditions of approval: "Data gathered to date are not applicable and cannot be used to support agent-free determinations." Please direct the UMCDF to provide valid data to support their conclusions.</li> <li>• 7 – The NRC's recommendations were conditioned on following the ABCDF and ANCDF restrictions. Please require the UMCDF to revise the WAP to include all the NRC/ABCDF/ANCDF off-facility shipping requirements.</li> <li>• 8 – Provide data and information supporting the off-facility shipment of DPE suits since the drums will contain occluded spaces.</li> <li>• 9 – Provide the emergency response plan per the NRC's Recommendation 6-4.</li> <li>• 10 – Provide the EIS required under NEPA.</li> <li>• 11 – Incorporate the CMA's requirements for off-facility shipment, that are in addition to the bounding TRA and carbon addendum, to the WAP as enforceable requirements.</li> <li>• 13 – Provide the site-specific health and safety approach describing mitigation measures during transport.</li> <li>• 14 – The CDC's review is of a different (older) version of the BTRA than what was provided in the PMR. Please require the UMCDF to have the CDC review and provide their evaluation of the BTRA submitted in this PMR.</li> <li>• 15 – The UMCDF did not provide the CDC's review of the carbon addendum. Please require the UMCDF to provide this evaluation.</li> <li>• 16 – The UMCDF presents the controls listed in Appendix F as part of what will make transportation an acceptable risk. Please require the UMCDF to revise the WAP to add these controls as enforceable requirements.</li> <li>• 20 – Use the correct terminology from the permit definitions throughout the WAP - off-facility shipment is for transport of wastes off the Depot, whereas offsite shipment limits shipment to within the Depot (i.e., J-Block).</li> <li>• 58, 59, 60, 61, 64, 66, 67, 68, 69, and 70 – Deficient proposed WAP revisions.</li> </ul>





## RESPONSE TO COMMENTS

Related to

### Permit Modification Request UMCDF 12-010-WAST(3)

Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage and Disposal Facility

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text) (Name of Commenter in Parentheses)	DEQ RESPONSE
RTC-1	This PMR is suitable for approval once the UMCDF has adequately addressed any concerns that might arise during the forthcoming CDC review of the standard operating procedure for waste drum headspace monitoring. (CTUIR)	The CDC is currently reviewing SOP UM-0000-M-095. Final approval of this request will not occur prior to the completion of the CDC review so that any requested changes by CDC can be incorporated into the SOP.
RTC-2	RTC-22, Please add the per-container 0.5 IDLH limitation/requirement to the WAP per the CDC's recommendation. (Hodney)	In order to be as explicit as possible, Footnote 1 to the headspace monitoring criteria table has been amended to read "Values in this column reflect the maximum allowable concentration of agent inside of each container."
RTC-3	RTC-25, The DEQ's summary of the comments related to this issue, and the DEQ's response to RTC-25 failed to include the crux of the comments, which is that the UMCDF's PMR 12-010 contained most of the same deficiencies as those previously identified by the DEQ in PMR 11-003. Therefore, the PMR was incomplete and the UMCDF should have been required to address the deficiencies identified by the DEQ in its review report of PMR 11-003. (Hodney)	<p>In reviewing Permit Modification Request UMCDF 11-002-WAST(3), DEQ identified a number of changes in that were request that were more related to closure and not to the off-site shipment of waste. As a result, DEQ asked that UMCDF- 11-002-WAST(3) be withdrawn and that the PMR be resubmitted only addressing those changes necessary to allow off-site shipment of waste. UMCDF – 11-002-WAST(3) was withdrawn Feb. 22, 2012. UMCDF- 12-010-WAST(3) is the re submitted permit modification request and has been significantly change to focus only on off-site shipment of waste. As a result not all deficiencies identified by DEQ in its review report of Permit Modification Request UMCDF 11-002-WAST(3) are applicable to this request.</p> <p>DEQ's review of the permit modification request under consideration here, UMCDF-12-010-WAST(3), was sufficient to meet the requirements of 40 CFR 270.42(c)(1).</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text) (Name of Commenter in Parentheses)	DEQ RESPONSE
RTC-4	RTC-26 and 28, For consistency throughout this section, for completeness, and for clarification, please add to Section 12 a statement that the requirements of Section 12 are not applicable to porous wastes. (Hodney)	The permittees have adequately demonstrated that spent carbon, a porous waste, can be shipped at low risk. A statement that Section 12 is not applicable to porous waste would not be consistent with this demonstration.
RTC-5	<p>RTC-32, The DEQ's response does not address the entire OAR, which states, "...highest and best practicable treatment <b>and or/control</b> as determined by the Department to protect public health and safety and the environment." [emphasis added] (Hodney)</p> <p>RTC-32, The DEQ and EQC have already established a precedent that the proposed off-facility shipment of agent-contaminated wastes falls under the OAR 340-120-0010(2)(c) BAT requirement when it was previously considered, and rejected, by the DEQ and EQC as the BAT for the treatment of the UMCDF's agent-contaminated secondary wastes. (Hodney)</p>	<p>Best available technology determinations, required by Oregon Administrative Rules (OAR) 340-120-0010(2)(c), apply only to treatment that occurs under a permit issued by DEQ. Off-site shipment is not treatment, and is not subject to a BAT determination.</p> <p>The offsite shipment alternative was offered to EQC as a non-BAT option to consider instead of incineration for secondary waste. See RTC-7.</p>
RTC-6	RTC-32, The EQC determined before it issued the permit to the Army for the UMCDF that an additional control was necessary to adequately protect Oregon's public health and safety and environment. It added requirements to the permit prohibiting the off-facility shipment of agent-contaminated hazardous wastes because of the unquantified potential risk. To protect Oregon's public health and safety and its environment, the permit will have to be revised to add a control allowing the off-facility transport and treatment of agent-contaminated wastes under specific conditions – i.e. within the parameters identified as being as acceptable risk to Oregon public health and safety and environment. (Hodney)	<p>The prohibition for off-site shipment of agent-contaminated wastes was adopted by EQC under the omnibus permitting authority contained in Oregon Revised Statute (ORS) 466.150(8) (see Section IV.C in Appendix 3 to the EQC's February 7, 1997 Order).</p> <p>The purpose of this modification request is to revise the permit to include an allowance for offsite shipment of agent contaminated waste when certain criteria are met.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text) (Name of Commenter in Parentheses)	DEQ RESPONSE
RTC-7	<p>RTC-32, I repeat my comment that this PMR is premature, and that before the DEQ makes a final decision that it should first obtain the EQC's consideration of and limitations on off-facility shipment and treatment as BAT for the treatment of the UMCDF's secondary wastes. At a minimum, the EQC's BAT determination should be obtained before the UMCDF is allowed to ship wastes off-facility under the new Section 12 requirements. (Hodney)</p> <p>RTC-32, Please obtain the EQC's approval of the off-facility shipment of the UMCDF's agent-contaminated wastes as BAT and/or provide a responsive response to this comment. (Hodney)</p>	<p>This proposed permit modification seeks changes to Conditions II.B.2 and II.B3, which were added to the permit by EQC. DEQ agrees that changes to these conditions require an action by EQC before final approval. This permit modification is scheduled to go to EQC for a decision on Oct. 25, 2012.</p> <p>The EQC action will be a consideration under the omnibus permitting authority of ORS 466.150(8) not under Best Available Technology.</p>
RTC-8	<p>RTC-35, Essentially, the DEQ's response is that no sampling requirements are required. This contradicts the DEQ's other responses to comments regarding the sampling requirements for this PMR, including RTC-14, which acknowledges the use of process knowledge in lieu of sampling is not acceptable to meet the requirements of Section 12. In this case, sampling requirements are necessary and should be required for off-facility shipment of wastes in order to determine compliance with the parameters and conditions determined necessary to transport these wastes at a low (acceptable) risk to Oregon's public health and safety and its environment. The DEQ has not established representative sampling requirements. The DEQ has not established measurable sampling requirements to determine compliance with the off-facility shipment of agent-contaminated wastes up to 0.5 IDLH. (Hodney)</p>	<p>All wastes streams generated at the facility are subject to the sampling and analysis requirements contained in Section 2 of the WAP. The request does not propose any changes to Section 2, so wastes managed under Section 12 will also be sampled in accordance with Section 2.</p> <p>In addition, wastes managed under Section 12, which have already been sampled under the requirements of Section 2, will be subject to headspace monitoring in each container.</p>
RTC-9	<p>Waste Analysis Plan (WAP), page 1, Why was page 1 of the WAP included in the fact sheet? The DEQ's fact sheet identified that no changes were made to page 1 of the WAP and no changes were identified to the public for its review. (Hodney)</p>	<p>Page 1 of the WAP was included to assist interested parties who may not have a familiarity with the structure of the permit in understanding that changes to Section 8 and Section 12 are being proposed in the WAP.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text) (Name of Commenter in Parentheses)	DEQ RESPONSE
RTC-10	SOP 095, Operation 2, Steps 1 and 2, Revise the SOP to be consistent with the requirement of Section 12 so that SOP 095 is not only limited to use on nonporous wastes, but also cannot be used on carbon or wastes with occluded spaces. (Hodney)	DEQ agrees that the standard operating procedure UM-0000-M-095 should be consistent with Section 12. Spent carbon has been added to the verification of Step 2 in Operation 2.  Step 1 of Operation 2 is a reminder to the user that a separate procedure applies to headspace monitoring for closure activities and is correct as proposed.
RTC-11	SOP 095, Operation 2, Step 3, Step 3 allows for more than one container within each tented area. This sampling is not consistent with the CDC's limitation and the DEQ's responses to RTC-22, which requires that <u>each</u> container must meet the 0.5 IDLH, not the average of multiple containers. Please revise the SOP to require sampling of each container. (Hodney) (Oliver)	The plurality on the word "containers" has been removed in Step 3 of Operation 2 and it is now clear that Step 3 of Operation 2 has to be provided for each container.
RTC-12	SOP 095, Appendix B, The DEQ appears to have copied this information into Section 12 of the WAP. Please make the same modifications to SOP 095 Appendix B as requested to Section 12 of the WAP. (Hodney)	When the SOP UM-0000-M-095 is finalized, it will contain the correct wording from Section 12.
RTC-13	The certification requirement that waste drums will be fed unopened and directly to the incinerator upon receipt is not strong enough. I would like to see "immediately" to be added to or replace "directly" to ensure that no interim storage occurs at the receiving facility. (Oliver)	The word "directly" has been changed to immediately.
RTC-14	The Permittees request that UMCDF procedure UM-0000-M-600, ACAMS Operations, be identified in Section 12 of the WAP as an acceptable method to determine the concentration of agent in the headspace. (UMCDF)	UM-0000-M-600 has been added to Section 12.

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text) (Name of Commenter in Parentheses)	DEQ RESPONSE
RTC-15	Section 12 should state that “in accordance with condition II.b.2, secondary waste containers meeting the head space monitoring criteria may be shipped...”, the “may” should be a must. (EPA)	The first paragraph in Section 12 was changed to address this concern. The paragraph has been turned into two separate sentences. One sentence retains the “may” to avoid establishing the Section 12 requirements as the primary option for wastes requiring treatment. The second sentence requires that wastes shipped off-site must be sent to an incineration facility.
RTC-16	Notwithstanding its own response, DEQ tentatively approved the PMR to allow for off-site shipment and <u>disposal</u> but did not modify the PMR to require off-site treatment.(EPA)	See response to comments RTC-15. The changes made to the first paragraph of Section 12 clarify that wastes shipped offsite must go to an incinerator.
RTC-17	UMCDF Waste Analysis Plan must be revised as follows: The end of the paragraph beginning “Regardless of requirements elsewhere in this document” must be revised to “May be shipped for off-site <b>incineration</b> at a RCRA Subtitle C <b>permitted incinerator and disposal facility and may be disposed of at such facility after completion of incineration.</b> The criteria in this section apply to all waste streams destined for off-site <b>incineration and disposal</b> at a RCRA Subtitle C TSDF. <b>Agent-contaminated carbon which is also contaminated with mercury must be segregated at all times from other wastes until such mercury-contaminated waste has been successfully treated by incineration at the permitted TSDF.</b> ” (EPA)	<p>There is no paragraph in the tentative decision that begins with “Regardless of requirements elsewhere in this document.” That phrase, and the paragraph it was contained in, was removed from the original permit modification request after the initial public comment period.</p> <p>DEQ believes the middle comment has been adequately addressed. (See RTC 15 and 16 above)</p> <p>DEQ disagrees with the sentence at the end. The segregation of mercury contaminated spent carbon has little to do with the criteria for off-site shipments and is outside the scope of this permit modification request. DEQ has also been unable to determine any requirements in 40 CFR 264 that allow it to insert this condition into the permit, and none was provided with the comment.</p>

Response to Comment (RTC) No.	COMMENT (Complete/Summarized text) (Name of Commenter in Parentheses)	DEQ RESPONSE
RTC-18	<p>UMCDF Waste Analysis Plan must be revised as follows: the paragraph “All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for disposal to a RCRA Subpart C disposal facility” is revised to “All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for <b>incineration and</b> disposal to a RCRA Subpart C <b>permitted incineration and</b> disposal facility <b>and may be disposal of at such facility after completion of incineration. Agent-contaminated carbon which is also contaminated with mercury must be segregated at all times from other wastes until such mercury-contaminated waste has been successfully treated by incineration at the permitted TSDF.</b>” (EPA)</p>	<p>The referenced paragraph was not part of the tentative decision issued for public comment.</p> <p>As to the remaining issues, see RTC-17.</p>



17 September 2012

Ms. Lissa Druback  
Department of Environmental Quality  
400 East Scenic Drive, Suite 307  
The Dalles, OR 97058

Re: UMCDF-12-010-WAST(3) "Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment Storage and Disposal Facility"

Dear Ms. Druback,

The Umatilla Indian Reservation (CTUIR) Department of Science and Engineering (DOSE) has completed its review of UMCDF-12-010-WAST(3) "Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment Storage and Disposal Facility". This PMR is suitable for approval once the UMCDF has adequately addressed any concerns that might arise during the forthcoming CDC review of the standard operating procedure for waste drum headspace monitoring.

If you have any questions concerning this matter please feel free to contact me at (541) 429-7420.

Sincerely,

Rodney S. Skeen, Ph.D, P.E.  
Division Leader, CTUIR-EMP/DOSE

Cc:  
Stuart Harris, Director, CTUIR DOSE  
File

September 17, 2012

Elizabeth Druback, Manager  
Eastern Region Hazardous Waste Program  
Department of Environmental Quality  
400 East Scenic Drive, Suite 307  
The Dalles, OR 97058  
[Druback.lissa@deq.state.or.us](mailto:Druback.lissa@deq.state.or.us)

Subject: Umatilla Chemical Agent Disposal Facility (UMCDF)  
Draft Permit for Permit Modification Request  
UMCDF-12-010-WAST(3) (PMR 12-010)  
Proposing the Deletion of the EQC's Permit  
Requirement to Treat all UMCDF Agent-Contaminated  
Wastes Onsite

Dear Ms. Druback:

Enclosed for your consideration are my public comments on the subject draft permit.

Sincerely,

Kelly H. Hodney

Enclosure: Public Comments on the Draft Permit for UMCDF PMR 12-010

cf: Linda Meyer, EPA Region 10  
Rod Skeen, Ph.D., CTUIR  
Umatilla County



**Comments on the Responses to Comments and Draft Permit for UMCDF PMR UMCDF-12-010-MISC(3)  
 Proposing the Deletion of the EQC's Requirement to Treat all Agent-Contaminated Wastes Onsite and the  
 Offsite Shipment of Agent-Contaminated Wastes**

#	Reference	Comment
1.	Response to Comments (RTC)-22	<p>The U.S. Centers for Disease Control (CDC) stipulated that in order for the shipment of up to 0.5 of the immediately dangerous to life and health (IDLH) agent-contaminated wastes to be an acceptable risk, that the 0.5 IDLH limitation must be met for each container – not an average for each batch or shipment of multiple containers. The DEQ states in its RTC-22 that this per-container requirement was incorporated in Section 12 of the WAP. However, it appears this requirement still has not been added to Section 12.</p> <p>Please add the per-container 0.5 IDLH limitation/requirement to the WAP per the CDC's recommendation.</p>
2.	RTC-25	<p>The DEQ's summary of the comments related to this issue, and the DEQ's response to RTC-25 failed to include the crux of the comments, which is that the UMCDF's PMR 12-010 contained most of the same deficiencies as those previously identified by the DEQ in PMR 11-003. Therefore, the PMR was incomplete and the UMCDF should have been required to address the deficiencies identified by the DEQ in its review report of PMR 11-003.</p>
3.	RTC-26 and RTC-28	<p>For consistency throughout this section, for completeness, and for clarification, please add to Section 12 a statement that the requirements of Section 12 are not applicable to porous wastes.</p> <p>"The provisions of this section do not apply to wastes that contain occluded spaces <u>as defined in SOP _____</u>, <del>or</del> free liquids, <u>or porous wastes such as concrete and wood.</u></p>
4.	RTC-32	<p>The DEQ's response does not address the entire OAR, which states, "...highest and best practicable treatment <b>and/or control</b> as determined by the Department to protect public health and safety and the environment." <i>[emphasis added]</i></p> <p>The EQC determined before it issued the permit to the Army for the UMCDF that an additional control was necessary to adequately protect Oregon's public health and safety and environment. It added requirements to the permit prohibiting the off-facility shipment of agent-contaminated hazardous wastes because of the unquantified potential risk. To protect Oregon's public health and safety and its environment, the permit will have to be revised to add a control allowing the off-facility transport and treatment of agent-contaminated wastes under specific conditions – i.e., within the parameters identified as being an acceptable risk to Oregon public health and safety and environment.</p> <p>The DEQ and EQC have already established a precedent that the proposed off-facility shipment of agent-contaminated wastes falls under the OAR 340-120-0010(2)(c) BAT requirement when it was previously considered, and rejected, by the DEQ and EQC as the BAT for the treatment of the UMCDF's agent-contaminated secondary wastes.</p> <p>I repeat my comment that this PMR is premature, and that before the DEQ makes a final decision that it should first obtain the EQC's consideration of and limitations on off-facility shipment and treatment as BAT for the treatment of the UMCDF's secondary wastes. At a minimum, the EQC's BAT determination should be obtained before the UMCDF is allowed to ship wastes off-facility under the new Section 12 requirements.</p> <p>Please obtain the EQC's approval of the off-facility shipment of the UMCDF's agent-contaminated wastes as BAT and/or provide a responsive response to this comment.</p>

#	Reference	Comment
5.	RTC-35	<p>"Adding initial and confirmation sampling is designed for wastes that will be treated at UMCDF. Sampling requirements for wastes treated at other facilities are controlled by the permits issued for those facilities."</p> <p>Essentially, the DEQ's response is that no sampling requirements are required. This contradicts the DEQ's other responses to comments regarding the sampling requirements for this PMR, including RTC-14, which acknowledges the use of process knowledge in lieu of sampling is not acceptable to meet the requirements of Section 12.</p> <p>In this case, sampling requirements are necessary and should be required for off-facility shipment of wastes in order to determine compliance with the parameters and conditions determined necessary to transport these wastes at a low (acceptable) risk to Oregon's public health and safety and its environment. The DEQ has not established representative sampling requirements. The DEQ has not established measurable sampling requirements to determine compliance with the off-facility shipment of agent-contaminated wastes up to 0.5 IDLH.</p> <p>Further, the CDC has established that each container of waste must comply with the &lt;0.5 IDLH limitation in order to be an acceptable risk. The CDC specifically stated each container must meet the criteria; not an average of multiple containers' contents. Therefore, each container must be individually sampled.</p> <p>Please add to Section 12 of the WAP the requirement to individually sample each container before shipment consistent with the CDC's recommendation that each container must individually meet the 0.5 IDLH limitation in order to be an acceptable transportation risk.</p>
6.	Waste Analysis Plan (WAP), page 1	Why was page 1 of the WAP included in the fact sheet? The DEQ's fact sheet identified that no changes were made to page 1 of the WAP and no changes were identified to the public for its review.
7.	SOP 095, Operation 2, Steps 1 and 2	Revise the SOP to be consistent with the requirement of Section 12 so that SOP 095 is not only limited to use on nonporous wastes, but also cannot be used on carbon or wastes with occluded spaces.
8.	SOP 095, Operation 2, Step 3	Step 3 allows for more than one container within each tented area. This sampling is not consistent with the CDC's limitation and the DEQ's responses to RTC-22, which requires that <u>each</u> container must meet the 0.5 IDLH, not the average of multiple containers. Please revise the SOP to require sampling of each container.
9.	SOP 095, Appendix B	The DEQ appears to have copied this information into Section 12 of the WAP. Please make the same modifications to SOP 095 Appendix B as requested to Section 12 of the WAP.



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
US ARMY CHEMICAL MATERIALS AGENCY  
UMATILLA CHEMICAL AGENT DISPOSAL FACILITY  
78072 ORDNANCE ROAD  
HERMISTON, OREGON 97838

**AUG 30 2012**

Scanned

12-0444

**FILE**

US Army Chemical Materials Agency  
UMCDF Field Office

ENV-12-0113

SUBJECT: Umatilla Chemical Agent Disposal Facility (UMCDF) Hazardous Waste Permit (ORQ 000 009 431-01) – Public Comment on Proposed Modification of Hazardous Waste Permit in Response to Permit Modification Request (PMR) UMCDF-12-010-WAST(3), “Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage and Disposal Facility”

Elizabeth Druback, Eastern Region Manager  
Solid and Hazardous Waste Programs  
Oregon Department of Environmental Quality  
400 East Scenic Drive, Suite 307  
The Dalles, Oregon 97058

**RECEIVED**  
AUG 31 2012

State of Oregon  
Dept. of Environmental Quality  
Eastern Region - The Dalles

Dear Ms. Druback:

Reference Notice, Oregon Department of Environmental Quality, dated August 6, 2012, subject: Public Notice: Request for Comments and Notice of September 5, 2012 Public Hearing, DEQ Proposes to approve a Class 3 Permit Modification for the Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage and Disposal Facility.

As a result of reviewing the proposed change pages for the modification of the hazardous waste permit in response to PMR UMCDF-12-010-WAST(3), “Shipment of Agent-Contaminated Secondary Waste to a Commercial Treatment, Storage and Disposal Facility,” the Permittees’ believe the proposed language for Section 12 of the Waste Analysis Plan (WAP) identifying use of the depot area air monitoring system (DAAMS) needs some expansion. Depending on the expected concentration in the headspace, it may be more appropriate for the UMCDF to use the automatic continuous air monitoring system (ACAMS). A DAAMS or an ACAMS may be utilized for headspace monitoring, depending on the expected concentration.

The Permittees request that UMCDF procedure UM-0000-M-600, ACAMS Operations, be identified in Section 12 of the WAP as an acceptable method to determine the concentration of agent in the headspace. Procedure UM-0000-M-600 is contained in Appendix C of the WAP.

We recommend the paragraph proposed in Section 12 of the WAP right after the first table be modified as follows:

Headspace monitoring will be performed in accordance with UMCDF SOP UM-0000-M-095, and UMCDF SOP UM-0000-M-556, "DAAMS GC/FPD Analysis", ~~or~~ UM-0000-M-557, "DAAMS GC-MSD/FPD Analysis," or UM-0000-M-600, "ACAMS Operations."

If you have any questions, please call our technical point of contact, Mr. Pat Mohondro, 541-564-7393.

Sincerely,



Date of Signature: 30 Aug 12

for Gary M. Anderson  
UMCDF Site Project Manager

\*CERTIFICATION STATEMENT

29 AUG 12

Date of Signature: 29 Aug 12

Steven D. Warren  
Washington Demilitarization Company, LLC  
Project General Manager

\*CERTIFICATION STATEMENT

\*I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION ACCORDING TO A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

**From:** Linda Meyer [<mailto:Meyer.Linda@epamail.epa.gov>]  
**Sent:** Tuesday, September 18, 2012 9:05 PM  
**To:** DRUBACK Lissa; DUVAL Rich  
**Cc:** Mike Slater; Lisa McArthur; Rick Albright; Janis Hastings; Christy Brown  
**Subject:** Fw: UMCDF PMR UMCDF-12-010-WAST(3) comment on Proposed WAP, Criteria for shipping

Lissa; I have not had a chance to touch base with Rich about this yet but left him a voice mail hoping to catch him Monday then missed him today. Below is my concern regarding the off-site shipment agent mod. If you have any suggestions for resolving this outside of 271. please let me know. I am in The Dalles all day tomorrow and will not be checking my email until the evening. My cell is 206.369.7132 if you want to give me a ring to discuss. Thanks.

I reviewed the DEQ tentative decision on August 6, 2012, to approve the above referenced PMR which proposed changes to the UMCDF Permit and WAP to allow for off-site shipment and disposal of agent-contaminated waste at a RCRA Subtitle C TSDF. EPA and others commented this PMR as documented by DEQ in the Response to Comments (RTC) published with DEQ's tentative decision of August 6, 2012. DEQ is accepting comment on the tentative decision to approve the above referenced PMR until 5pm September 20, 2012.

During the initial public comment period, EPA and others commented on the need to treat, rather than merely dispose of agent-contaminated waste shipped off-site. DEQ summarized the comments on this point in RTC-1 as follows:

*The permit modification must clearly require the Permittee to treat the agent-contaminated waste in a RCRA permitted incinerator. Other disposal options, such as land disposal, are not consistent with the Center for Disease Control's (CDC's) recommendations. (EPA); Appendix K, Proposed permit language, condition II.B.2. This revision must state that agent-contaminated material, if shipped off-site, will be treated in a RCRA permitted TSDF incinerator. (EPA); (10) Appendix L, Proposed changes to the WAP, additional text added under item 12, page 28 of 68. The first paragraph must clearly state that the agent-contaminated material going off-site must go to a RCRA permitted TSDF incinerator....(EPA); (16) Appendix L, proposed changes to the WAP, sixth paragraph, page 29 of 68. This statement must clarify that the agent-contaminated waste must go to a RCRA permitted TSDF incinerator for treatment, not to a Subtitle C facility for disposal. (EPA); PMR Appendix L, WAP Change Pages, Section 12, 1<sup>st</sup> and 7<sup>th</sup> paragraphs. As written, this paragraph implies, and paragraph explicitly states, agent-contaminated wastes may be shipped to a RCRA Subtitle C disposal facility. This is not supported by the NRC, CDC, nor the TRAs. Please revise to specify a RCRA Subtitle C incinerator treatment facility. (Hodney).*

DEQ's response to the comments on the need for treatment rather than disposal was:  
*DEQ agrees with these comments. Section 12 of the WAP has been modified to clearly state that the waste shipped off-site must go to a RCRA TSDF permitted as an incinerator.*

Notwithstanding its own response, DEQ tentatively approved the PMR to allow for off-

site shipment and disposal but did not modify the PMR to require off-site treatment. DEQ offers no explanation as to why treatment is not required. EPA's earlier comments have not been fully addressed. It is EPA's position, consistent with CDC recommendations, that the agent-contaminated wastes be treated in a RCRA Subtitle C incinerator if shipped off-site, not merely shipped and disposed of at such a facility. Of particular concern is agent-contaminated carbon. Also of concern is the treatment and disposal of mercury-contaminated carbon which the Chemical Materials Agency states should not be intermingled with other carbons during storage so as to presumably allow for specific treatment prior to disposal.

We are in the process of drafting a letter:

*EPA comments, in accordance with 40 CFR 271.19, are that the proposed change to page 28, section 12. Criteria for Shipping, in Attachment 2 to UMCDF Permit Number ORQ-000-0090431-01, UMCDF Waste Analysis Plan, must be revised as follows:*

- 1. The end of the paragraph beginning "Regardless of requirements elsewhere in this document" must be revised to "may be shipped for off-site **incineration** at a RCRA Subtitle C **permitted incinerator and disposal facility and may be disposed of at such facility after completion of incineration.** The criteria in this section apply to all waste streams destined for offsite **incineration and disposal** at a RCRA Subtitle C TSDf. **Agent-contaminated carbon which is also contaminated with mercury must be segregated at all times from other wastes until such mercury-contaminated waste has been successfully treated by incineration at the permitted TSDf.** "*
- 2. The paragraph "All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for disposal to a RCRA Subpart C disposal facility" is revised to "All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for **incineration and disposal** to a RCRA Subpart C **permitted incineration and disposal facility and may be disposed of at such facility after completion of incineration.** **Agent-contaminated carbon which is also contaminated with mercury must be segregated at all times from other wastes until such mercury-contaminated waste has been successfully treated by incineration at the permitted TSDf.**"*



Rich - I apologize for the delay - I just received this email, our system has been down today. I have looked at the info that Lissa provided. I still have a concern with the change to II.B.2 - allows for transfer to treatment or disposal and later in the paragraph refers to attachment 2. I am not sure what attachment 2 is. Further, section 12 should state that "in accordance with condition II.b.2, secondary waste containers meeting the head space monitoring criteria may be shipped..", this "may" should be must.

Finally, I want to double check that this info that Lissa provided is on the link we have access to to ensure that it was available for public review.

Thanks.

Linda Meyer  
U.S. EPA Region 10  
1200 Sixth Avenue, Suite 900, AWT-121  
Seattle, WA 98101-3140  
phone (206)553-6636  
fax (206)553-8509

▼ DUVAL Rich ---09/21/2012 09:03:27 AM---I'm in the process of finalizing the response to comments for this permit modification. Do you want

From: DUVAL Rich <[DUVAL\\_Rich@deq.state.or.us](mailto:DUVAL_Rich@deq.state.or.us)>  
To: Linda Meyer/R10/USEPA/US@EPA  
Date: 09/21/2012 09:03 AM  
Subject: RE: UMCDF PMR UMCDF-12-010-WAST(3) comment on Proposed WAP, Criteria for shipping

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I'm in the process of finalizing the response to comments for this permit modification. Do you want these comments included?

**From:** Linda Meyer [<mailto:Meyer.Linda@epamail.epa.gov>]  
**Sent:** Tuesday, September 18, 2012 9:05 PM  
**To:** DRUBACK Lissa; DUVAL Rich  
**Cc:** Mike Slater; Lisa McArthur; Rick Albright; Janis Hastings; Christy Brown  
**Subject:** Fw: UMCDF PMR UMCDF-12-010-WAST(3) comment on Proposed WAP, Criteria for shipping

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I reviewed the DEQ tentative decision on August 6, 2012, to approve the above referenced PMR which proposed changes to the UMCDF Permit and WAP to allow for off-site shipment and disposal of agent-contaminated waste at a RCRA Subtitle C TSDF. EPA and others commented this PMR as documented by DEQ in the Response to Comments (RTC) published with DEQ's tentative decision of August 6, 2012. DEQ is accepting comment on the tentative decision to approve the above referenced PMR until 5pm September 20, 2012.

During the initial public comment period, EPA and others commented on the need to treat, rather than merely dispose of agent-contaminated waste shipped off-site. DEQ summarized the comments on this point in RTC-1 as follows:

*The permit modification must clearly require the Permittee to treat the agent-contaminated waste in a RCRA permitted incinerator. Other disposal options, such as land disposal, are not consistent with the Center for Disease Control's (CDC's) recommendations. (EPA); Appendix K, Proposed permit language, condition II.B.2. This revision must state that agent-contaminated material, if shipped off-site, will be treated in a RCRA permitted TSDF incinerator. (EPA); (10) Appendix L, Proposed changes to the WAP, additional text added under item 12, page 28 of 68. The first paragraph must clearly state that the agent-contaminated material going off-site must go to a RCRA permitted TSDF incinerator....(EPA); (16) Appendix L, proposed changes to the WAP, sixth paragraph, page 29 of 68. This statement must clarify that the agent-contaminated waste must go to a RCRA permitted TSDF incinerator for treatment, not to a Subtitle C facility for disposal. (EPA); PMR Appendix L, WAP Change Pages, Section 12, 1<sup>st</sup> and 7<sup>th</sup> paragraphs. As written, this paragraph implies, and paragraph explicitly states, agent-contaminated wastes may be shipped to a RCRA Subtitle C disposal facility. This is not supported by the NRC, CDC, nor the TRAs. Please revise to specify a RCRA Subtitle C incinerator treatment facility. (Hodney).*

DEQ's response to the comments on the need for treatment rather than disposal was:  
*DEQ agrees with these comments. Section 12 of the WAP has been modified to clearly state that the waste shipped off-site must go to a RCRA TSDF permitted as an incinerator.*

Notwithstanding its own response, DEQ tentatively approved the PMR to allow for off-site shipment and disposal but did not modify the PMR to require off-site treatment. DEQ offers no explanation as to why treatment is not required. EPA's earlier comments have not been fully addressed. It is EPA's position, consistent with CDC recommendations, that the agent-contaminated wastes be treated in a RCRA Subtitle C incinerator if shipped off-site, not merely shipped and disposed of at such a facility. Of particular concern is agent-contaminated carbon. Also of concern is the treatment and disposal of mercury-contaminated carbon which the Chemical Materials Agency states should not be intermingled with other carbons during storage so as to presumably allow for specific treatment prior to disposal.

We are in the process of drafting a letter:

*EPA comments, in accordance with 40 CFR 271.19, are that the proposed change to page 28, section 12. Criteria for Shipping, in Attachment 2 to UMCDF Permit Number ORQ-000-0090431-01, UMCDF Waste Analysis Plan, must be revised as follows:*

*1. The end of the paragraph beginning "Regardless of requirements elsewhere in this document" must be revised to "may be shipped for off-site **incineration** at a RCRA Subtitle C **permitted incinerator and disposal facility and may be disposed of at***



***such facility after completion of incineration. The criteria in this section apply to all waste streams destined for offsite incineration and disposal at a RCRA Subtitle C TSDF. Agent-contaminated carbon which is also contaminated with mercury must be segregated at all times from other wastes until such mercury-contaminated waste has been successfully treated by incineration at the permitted TSDF. "***

2. The paragraph "All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for disposal to a RCRA Subpart C disposal facility" is revised to "All waste meeting the bounding TRA or the carbon addendum criteria may be shipped offsite for ***incineration and disposal to a RCRA Subpart C permitted incineration and disposal facility and may be disposed of at such facility after completion of incineration. Agent-contaminated carbon which is also contaminated with mercury must be segregated at all times from other wastes until such mercury-contaminated waste has been successfully treated by incineration at the permitted TSDF.***"

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION  
OF THE STATE OF OREGON

In the Matter of the Application of )  
the United States Army for a Permit ) FINDINGS AND CONCLUSIONS  
to Construct and Operate a Chemical ) OF THE COMMISSION  
Weapons Demilitarization Facility at ) AND ORDER  
the Umatilla Chemical Depot. )

General Background Findings

1. This is a proceeding in which the United States Army  
(the Army) seeks a hazardous waste treatment permit for  
construction and operation of incinerator facilities to destroy  
chemical weapons stored at the Umatilla Chemical Depot. The  
Commission has jurisdiction pursuant to ORS 466.005 *et seq.*

2. The Umatilla Chemical Depot is a facility owned and  
operated by the Department of the Army. The identification  
number of this facility is OR6 213 820 917.

3. The Umatilla Chemical Depot encompasses approximately  
20,000 acres in Morrow and Umatilla counties.

4. In September 1994, the Umatilla Chemical Depot finished  
destruction or removal of all conventional munitions from  
storage, leaving only chemical agent in storage.

5. The Umatilla Chemical Depot is currently listed for  
base realignment and closure following the completion of its  
current mission to destroy the chemical agent stockpile.

6. From 1962 to 1969 the Umatilla Chemical Depot received  
chemical warfare munitions for storage that included the nerve  
agents GB (also known as Sarin) and VX, and the blister agent HD  
(also known as mustard).

1           7.     From 1969 to the present, the Umatilla Chemical Depot  
2 has continued to store chemical agent munitions termed  
3 "stockpile" munitions.

4           8.     The Department of Defense Authorization Act of 1986  
5 (Public Law 99-145) directed the Secretary of Defense to develop  
6 a program for the disposal of all stockpile chemical agent  
7 munitions. The law required that the stockpile be destroyed by  
8 September 30, 1994. The Army subsequently proceeded with a pilot  
9 agent incineration program at the mid-Pacific Johnston Atoll.

10          9.     In response to Public Law 99-145 the Army established  
11 the Office of the Program Manager for Chemical Demilitarization  
12 with the responsibility to destroy the stockpile.

13          10.    Public Law 99-145 also required that the Secretary of  
14 the Army compare and contrast the advantages and disadvantages of  
15 disposing of the chemical agents and munitions at stockpile  
16 storage locations, regional disposal centers, or a national  
17 disposal center, either inside or outside the continental United  
18 States. The Chemical Stockpile Disposal Program (CSDP) is the  
19 name of the program to address stockpile destruction.

20          11.    The CSDP program was subjected to review under the  
21 National Environmental Policy Act (NEPA) of 1969 (Public Law 91-  
22 190, as amended). The Army proceeded with the NEPA process by  
23 first addressing stockpile destruction on a national level (e.g.,  
24 whether to proceed with regional or onsite treatment) and then  
25 with site specific review. Analysis of risks of treatment  
26 ///

1 alternatives and risks of storage were included as part of the  
2 Army's programmatic NEPA review.

3 12. The Army issued a FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT  
4 STATEMENT in January 1988. In February 1988, the Army promulgated  
5 its Record of Decision (53 Fed Reg 5816-5817) identifying on-site  
6 incineration at the continental stockpile sites as the preferred  
7 alternative for disposal of the nation's chemical weapons  
8 stockpile.

9 13. In September 1988, Congress passed Public Law 100-456  
10 which ordered an evaluation period known as "Operation  
11 Verification Testing" (OVT) at the Johnston Atoll Chemical Agent  
12 Disposal System (JACADS) incineration facility to demonstrate  
13 safety and effectiveness before testing at continental stockpile  
14 sites. This law also extended the deadline for the elimination  
15 of the stockpile to April 30, 1997.

16 14. In February 1990, the Army completed the final PHASE 1  
17 ENVIRONMENTAL REPORT FOR DISPOSAL OF CHEMICAL AGENTS AND MUNITIONS STORED AT  
18 UMATILLA DEPOT ACTIVITY, HERMISTON, OREGON. This report was pursuant to  
19 NEPA and was for site specific review of onsite treatment at  
20 Umatilla. The PHASE I ENVIRONMENTAL REPORT concurred that onsite  
21 treatment was appropriate for the Umatilla Chemical Depot and  
22 recommended proceeding with an Environmental Impact Statement for  
23 onsite incineration. Since this report was issued, the Army has  
24 proceeded with onsite review and has issued additional  
25 Environmental Impact Analyses. A final Environmental Impact  
26 ///

1 Statement was issued May 1996 and a "Revised Final Environmental  
2 Impact Statement" was issued November 1996.

3 15. In December 1991, Congress passed Public Law 102-190  
4 which extended the stockpile destruction date to July 31, 1999.

5 16. In October 1992, Congress passed Public Law 102-484  
6 which extended the stockpile destruction deadline to December 31,  
7 2004; directed the Army to submit a report to Congress on  
8 potential alternatives to incineration; established citizen  
9 advisory commissions in Kentucky, Indiana, and Maryland; and  
10 allowed for establishment of citizen commissions at other  
11 stockpile sites if requested by the Governor of that State. (The  
12 Governor of Oregon appointed a Citizens Demilitarization Advisory  
13 Committee for the Umatilla Chemical Depot on August 6, 1993.)

14 17. The Army, since 1966, has requested independent review  
15 from the National Academy of Sciences of various issues regarding  
16 chemical agent demilitarization. The National Academy of  
17 Sciences, acting on a request by the Army in 1987, formed a  
18 standing committee from its National Research Council (NRC) to  
19 review technical issues on chemical demilitarization. In March  
20 1991, the NRC committee recommended to the Army review of  
21 alternative technologies for the chemical stockpile disposal and  
22 formulation of recommendations. The Army concurred. This NRC  
23 review culminated in a 1994 NRC report, RECOMMENDATIONS FOR THE  
24 DISPOSAL OF CHEMICAL AGENTS AND MUNITIONS, that recommended the Army's  
25 baseline incineration program be continued without delay (but  
26 with neutralization study for the two low-volume bulk sites at

1 Aberdeen, Maryland and Newport, Indiana). The report also  
2 recommended adding carbon filters to the proposed incinerators'  
3 pollution abatement systems. The Army concurred with the NRC's  
4 recommendation to add the carbon filters. In 1994 the Army  
5 submitted to Congress the agent destruction alternatives report,  
6 U.S. ARMY'S ALTERNATIVE DEMILITARIZATION TECHNOLOGY REPORT TO CONGRESS,  
7 required by Public Law 102-484 which included an analysis of  
8 information from the NRC report.

9 18. The 1994 NRC report also recommended that site-specific  
10 risk analyses of storage be conducted to confirm the conclusions  
11 of the "Final Programmatic Environmental Impact Statement" and  
12 confirm the wisdom in proceeding promptly with stockpile  
13 disposal. In response to this recommendation, the Army directed  
14 that a quantitative risk assessment be developed for the Umatilla  
15 Chemical Depot. The Army issued a report entitled, UMATILLA  
16 CHEMICAL AGENT DISPOSAL FACILITY PHASE 1 QUANTITATIVE RISK ASSESSMENT, in  
17 September 1996. The report concluded that the risk of disposal  
18 processing is significantly less than the risk of continued  
19 storage.

20 19. The Army has continued analysis of the issue of  
21 examining alternative technologies for the two low-level bulk  
22 agent sites. The Army solicited alternative technology proposals  
23 for the two low-volume bulk sites in August 1995, and requested  
24 the NRC to re-review and evaluate the status of a limited number  
25 of maturing alternative technologies. The NRC issued its report  
26 entitled REVIEW AND EVALUATION OF ALTERNATIVE CHEMICAL DISPOSAL TECHNOLOGIES

1 in October 1996. The NRC report recommended neutralization for  
2 the bulk sites located at Aberdeen, Maryland and Newport,  
3 Indiana. This report reviewed treatment for bulk liquid agents  
4 and metal containers and did not review possible alternative  
5 technologies for energetic (i.e., explosive) materials or  
6 munition casings such as those at Umatilla.

7 20. Congress passed Public Law 104-201 (Defense  
8 Authorization Act for Fiscal Year 1997) containing a requirement  
9 that a report be submitted by the Army to Congress that reviews  
10 alternative technologies for the disposal of assembled chemical  
11 munitions. This report must be submitted by December 31, 1997.  
12 The Army has informed the Governor of Oregon that because the  
13 risk of continued storage of agent at Umatilla is substantially  
14 greater than risks from incineration, and because incineration at  
15 this time is the only mature technology available, it desires to  
16 pursue the hazardous waste treatment permit for baseline  
17 incineration at Umatilla.

18 21. The U.S. and 130 other nations signed what is called  
19 the Chemical Weapons Convention in January 1993. The Senate,  
20 however, has not ratified this treaty. The treaty would mandate  
21 an international timetable to completely destroy chemical agent  
22 stockpiles, and would require irreversible destruction.

23 **General Findings Pertaining to Permit Development**

24 22. Anticipating the need to destroy the agent stockpile in  
25 accordance with Public Law 99-145, in September 1986 the Army  
26 submitted its first permit application to the Oregon Department

1 of Environmental Quality (Department) for a hazardous waste  
2 treatment permit for the construction and operation of a new  
3 hazardous waste incineration facility at the Umatilla Chemical  
4 Depot pursuant to 40 CFR § 270.10(a), adopted by OAR 340-100-002,  
5 and pursuant to ORS § 466.055, *et seq.*

6 23. In February 1987, the Department issued to the Army a  
7 first notice of deficiency (NOD) on the Umatilla hazardous waste  
8 treatment permit application. The NOD was issued pursuant to 40  
9 CFR § 124.3 which is adopted by Oregon rule OAR 340-100-002. The  
10 NOD listed 57 issues to be addressed before the application could  
11 be considered complete.

12 24. In March 1987, the Army submitted its first Air  
13 Contaminant Discharge Permit application to the Department in  
14 accordance with OAR 340-28-1720. Pursuant to OAR 340-28-1900 the  
15 Army may not build and operate the facility until an Air  
16 Contaminant Discharge Permit is issued by the Department.

17 25. The Army responded in June 1987 to the Department's  
18 first NOD by updating the permit application.

19 26. During 1987 and 1988, the Department issued to the Army  
20 a second NOD for the Umatilla hazardous waste treatment permit  
21 application. The NOD listed 96 issues to be addressed by the  
22 applicant in order for the application to be considered complete.

23 27. In October 1990, the Army responded to the Department's  
24 second NOD for the Umatilla hazardous waste treatment permit  
25 application.

26 ///



1        28. In May 1991, the Army re-submitted the application to  
2 the Department for an air contaminant discharge permit for the  
3 Umatilla Chemical Depot.

4        29. In January 1992, the Department issued to the Army a  
5 third NOD on the Umatilla hazardous waste treatment permit  
6 application. The third NOD listed 60 issues to be addressed.

7        30. In November 1992, the Army responded to the  
8 Department's third NOD on the hazardous waste treatment permit  
9 application.

10       31. In April 1993, the Department issued to the Army a  
11 fourth NOD on the hazardous waste treatment permit application.  
12 The fourth NOD listed 19 issues to be addressed.

13       32.. In June 1993, the Army responded to the Department's  
14 fourth NOD.

15       33. In July 1993, the Department and the Army entered into  
16 an Intergovernmental Cooperative Agreement for the continued  
17 review and processing of the hazardous waste treatment permit  
18 application.

19       34. In March 1994, the Department issued to the Army a  
20 fifth NOD on the Umatilla hazardous waste treatment permit  
21 application. The fifth NOD listed 19 issues to be addressed.

22       35. In April 1994, the Department opened a regional field  
23 office in Hermiston, Oregon staffed by a DEQ employee designated  
24 as the Umatilla permits coordinator. This position has had the  
25 primary duty of providing the public with information regarding  
26 ///

1 the processing of the hazardous waste and air quality permit  
2 decisions.

3 36. On March 6, 1995, the Army responded to the  
4 Department's fifth NOD with an updated hazardous waste treatment  
5 permit application dated February 1995.

6 37. In August 1995, the Army submitted an updated  
7 application to the Department for an air contaminant discharge  
8 permit for the Umatilla Chemical Depot.

9 38. The Department requested from the Army further  
10 information in accordance with 40 CFR 124.3 (adopted by OAR  
11 § 340-100-002) on March 6, 1996. In accordance with 40 CFR  
12 § 124.3, the Army responded to the information request on  
13 March 21, 1996 with updated pages for the hazardous waste  
14 treatment permit application.

15  
16 **General Findings Pertaining to  
Risk Assessment Conducted by the Department**

17 39. During the Department's technical review of the  
18 hazardous waste treatment permit application, the U.S.  
19 Environmental Protection Agency (EPA) issued the DRAFT NATIONAL  
20 HAZARDOUS WASTE COMBUSTION STRATEGY (COMBUSTION STRATEGY) in May 1993. The  
21 COMBUSTION STRATEGY adopted a national policy requiring a risk  
22 assessment on the potential emissions from a hazardous waste  
23 incinerator before issuance of a draft hazardous waste treatment  
24 permit for public comment. The COMBUSTION STRATEGY also stated a  
25 preference for the regulatory agency issuing the permit (i.e.,  
26 EPA or the State review agency) to conduct the risk assessment.

40. In March 1994, the Department stated in its fifth NOD that the Department would be conducting a risk assessment in accordance with the COMBUSTION STRATEGY.

41. In April 1994, EPA issued guidance on how to conduct a risk assessment for hazardous waste incinerators.

42. In October 1994, the Department began work with its contractor, Ecology and Environment, Inc., to conduct a risk assessment in accordance with the national combustion strategy following the guidance issued by EPA.

43. On April 5, 1996, the Department issued a draft hazardous waste treatment permit and a DRAFT PRE-TRIAL BURN RISK ASSESSMENT FOR THE PROPOSED UMATILLA CHEMICAL DEMILITARIZATION FACILITY. The risk assessment concluded that there would be no adverse effects on either public health or the environment from the operations of the Umatilla incinerator facility.

**General Findings Pertaining to  
Draft Permit and Public Participation**

44. Pursuant to 40 CFR 124.10 (adopted by OAR § 340-100-002), the Department issued for public comment a draft hazardous waste treatment permit for the Umatilla Chemical Depot on April 5, 1966. In accordance with 40 CFR 124.8 (adopted by OAR § 340-100-002), the Department also issued a Fact Sheet which summarized the draft hazardous waste treatment permit. In accordance with 40 CFR 124.10 (adopted by OAR § 340-100-002), the Department sent out to the Umatilla Chemical Depot mailing list a  
///

1 Public Notice soliciting comments on the draft hazardous waste  
2 treatment permit.

3 45. In accordance with OAR 340-28-1900, the Department  
4 issued a draft air contaminant discharge permit for public  
5 comment on April 5, 1996. The Department also developed an AIR  
6 CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT, in accordance with  
7 Department policy, which summarizes the Department's review of  
8 the air application and rationale for setting draft air quality  
9 permit conditions. In accordance with OAR 340-28-1710, the  
10 Department issued a Public Notice to the Umatilla Chemical Depot  
11 mailing list soliciting comments on the draft air contaminant  
12 discharge permit.

13 46. In addition to soliciting comments for the draft  
14 hazardous waste treatment permit and air contaminant discharge  
15 permits, the Department issued for public notice on April 5,  
16 1996, an INVITATION TO COMMENT ON FINDINGS (ORS 466.055 & ORS 466.060) AND  
17 RISK ASSESSMENT and mailed the notice to the Umatilla Chemical  
18 Depot mailing list. The notice requested comments on the  
19 Department's Pre-Trial Burn Risk Assessment, and on the ORS §§  
20 466.055 and 466.060 criteria (ORS Criteria) under which the  
21 Commission must make findings before a hazardous waste treatment  
22 permit can be issued. The Department issued this INVITATION TO  
23 COMMENT to encourage public participation.

24 47. The initial comment period on the draft environmental  
25 permits, risk assessment and ORS 466 criteria was to end at  
26 5:00 p.m. on June 17, 1996 which allowed for a 73-day public

1 comment period. The 73-day comment period exceeds the minimum  
2 length of 45 days set forth in 40 CFR 124.10(b) (adopted by OAR  
3 § 340-100-002) for the draft hazardous waste treatment permit and  
4 the minimum length of 30 days set forth in OAR 340-28-1710 for  
5 the draft air contaminant discharge permit.

6 48. In accordance with 40 CFR 124.10 (adopted by OAR § 340-  
7 100-002) for the draft hazardous waste draft treatment permit,  
8 and OAR 340-28-1710 for the draft air contaminant discharge  
9 permit, four hearings were held to accept public comment. These  
10 four hearings were held as follows:

- 11 • On May 13, 1996 in Pendleton, Oregon at 7:00 p.m. at the  
12 Pendleton Convention Center.
- 13 • On May 14, 1996 in Kennewick, Washington at 7:00 p.m. at  
14 Kennewick High School.
- 15 • On May 29, 1996 in Portland, Oregon at 7:00 p.m. at the  
16 World Trade Center.
- 17 • On June 10, 1996 in Hermiston, Oregon at 7:00 p.m. at the  
18 Hermiston Community Center.

19 49. On June 17, 1996 the Department extended the comment  
20 period for the draft environmental permits, risk assessment and  
21 the ORS Criteria to November 15, 1996 at 5:00 p.m. This  
22 extension added an additional 151 days for a total public comment  
23 period of 224 days. Extension of the comment period for the  
24 draft hazardous waste treatment permit was in accordance with 40  
25 CFR 124.13 (adopted by OAR § 340-100-002) and a public notice of  
26 the comment period extension was mailed to the Umatilla mailing  
list in accordance with 40 CFR 124.13 (adopted by OAR § 340-100-  
002).

1           50. Based on a request from a member of the public at the  
2 November 15, 1996 Commission meeting, the public comment period  
3 was extended to 8:00 a.m. on November 16, 1996.

4           51. A number of submittals containing comments were  
5 received by the Department at the close of the comment period.  
6 The Commission was provided complete copies of all comments  
7 received including written transcripts of public testimony  
8 accepted during public hearings. A summary of the comments  
9 received was tabulated by the Department and provided to the  
10 Commission at its November 22, 1996 meeting. Public comment and  
11 submittals were placed in the administrative record.

12                           **General Findings Pertaining to**  
13                           **Development of Criteria Findings Required**  
14                           **by ORS 466.055, 466.060 and OAR 340, Division 120**

15           52. Oregon law requires that the Commission make findings  
16 on specific criteria before a final hazardous waste treatment  
17 permit can be issued. ORS 466.055, 466.060 and OAR 340, Division  
18 120.

19           53. On January, 11, 1996, the Commission held a first work  
20 session on the proposed Umatilla permit in Portland, Oregon and  
21 was briefed on the proposed permit for incineration of chemical  
22 weapons at the Umatilla Chemical Depot. Presenters included DEQ  
23 staff and other interested parties.

24           54. On April 12, 1996, the Commission held a second work  
25 session and was briefed by DEQ staff on the proposed Umatilla  
26 permits and the Commission findings, and received limited public  
comment.

1           55. On May 10, 1996, the Commission and the Department  
2 Director traveled to Utah to tour the Tooele chemical  
3 demilitarization facility.

4           56. On May 16, 1996, the Commission conducted a third work  
5 session in Portland, Oregon. DEQ staff presented information  
6 about the air permit and the Pre-Trial Burn Risk Assessment, and  
7 counsel from the Oregon Department of Justice described the legal  
8 requirements and findings necessary to issue a hazardous waste  
9 treatment permit. A panel discussion was presented on  
10 alternatives to incineration. Presenters included the Army,  
11 vendors of three alternative technologies and Greenpeace.

12           57. On May 17, 1996, the Commission received a briefing  
13 from Oregon Emergency Management and Morrow County Emergency  
14 Management concerning the Chemical Stockpile Emergency  
15 Preparedness Program (CSEPP). Mick Harrison of Greenlaw and Dr.  
16 Mary O'Brien made presentations to the Commission on risk  
17 assessment. Public testimony was received, including testimony  
18 from representatives of local government, the Citizens Advisory  
19 Commission, Greenpeace and the Confederated Tribes of the  
20 Umatilla Indian Reservation.

21           58. On July 11, 1996, the Commission held a fourth work  
22 session in Portland, Oregon, and received a presentation from  
23 Department staff and the Department's risk assessment contractor,  
24 Ecology and Environment, Inc., responding to risk assessment  
25 issues. Army representatives responded to questions concerning  
26 safety and alternative permitting scenarios.

1           59. On August 22, 1996, the Commission conducted a fifth  
2 work session in Hermiston, Oregon. The session included a tour  
3 of the Umatilla Chemical Depot. A question-and-answer work  
4 session discussing various Umatilla subjects was held at the  
5 Hermiston Community Center. Discussion included proposed federal  
6 legislation, alternative technologies and stockpile storage  
7 risks. Professor Lisa of the Chemical Engineering Department of  
8 Oregon State University, under contract to the Department,  
9 provided verbal testimony on expected dioxin emissions from the  
10 proposed Umatilla incinerators. During an evening session the  
11 Commission heard oral public testimony on the proposed  
12 environmental permits.

13           60. On August 23, 1996, the Commission received a  
14 presentation from Department staff concerning the finding of  
15 "best available technology" that must be made before a new  
16 hazardous waste treatment permit can be issued by the Commission.  
17 The Commission adopted a list of evaluation criteria to be  
18 considered for evaluation of the best available technology.

19           61. On September 27, 1996, the Commission held a sixth work  
20 session in Portland, Oregon and heard public testimony from the  
21 Oregon Environmental Council, Greenpeace and the Oregon Center  
22 for Environmental Health. Department staff presented a draft  
23 staff report concerning Commission findings that must be made  
24 before issuance of a hazardous waste treatment permit for the  
25 incineration of nerve agents at Umatilla Chemical Depot. The  
26 Department also presented to the Commission a staff report.



1 listing draft hazardous waste treatment permit conditions to  
2 address specific concerns raised by the Commission at previous  
3 work sessions.

4 62. On November 14, 1996, the Commission, during a regular  
5 meeting held in Portland, Oregon, heard a presentation from the  
6 Confederated Tribes of the Umatilla Indian Reservation which  
7 proposed a moratorium pending appointment of a Governor's task  
8 force to further evaluate alternatives to incineration of the  
9 Umatilla Chemical Depot stockpile, and construction of a munition  
10 reverse assembly facility.

11 63. On November 15, 1996, the Commission held a seventh  
12 work session in Portland, Oregon, reviewing the revised FINDINGS  
13 staff report and the draft BEST AVAILABLE TECHNOLOGY REPORT from the  
14 Department. Also at the meeting Professor Iisa of Oregon State  
15 University provided additional testimony to the Commission based  
16 on her October 29, 1996 written report concerning potential  
17 dioxin emissions from incineration.

18 64. The Commission, before its November 22, 1996 meeting,  
19 received and had the opportunity to review all public comment  
20 previously reviewed regarding the hazardous waste treatment  
21 permit including written transcripts of all scheduled public  
22 hearings.

23 65. On November 22, 1996, the Commission met in Pendleton,  
24 Oregon. The Commission heard final briefings from the Army and  
25 Department staff. At this meeting the Commission deliberated the  
26 issues, discussed public concerns as reflected in public

1 testimony and comment and came to a consensus that incineration,  
2 as proposed in the Army's hazardous waste treatment permit  
3 application, is the best available technology. The Commission  
4 determined that the remaining statutory findings could be made  
5 and directed Department staff to prepare a final hazardous waste  
6 treatment permit with additional and modified conditions and  
7 technical corrections.

8 66. An Administrative Record has been compiled and is  
9 maintained at the Department's Eastern Region office in Bend. An  
10 index to the Administrative Record is attached to this document  
11 as Appendix 1.

12 Findings and Conclusions Required by Statute and Regulation

13 67. ORS 466.055, ORS 466.060 and OAR 340, Division 120  
14 require that certain specific affirmative findings be made by the  
15 Commission before a hazardous waste treatment facility permit for  
16 a new hazardous waste treatment facility may be issued in Oregon.

17 68. The Army's proposed chemical weapons demilitarization  
18 incinerator is a proposal for a new treatment facility subject to  
19 certain of these findings.

20 69. Pursuant to ORS 466.020 the Commission has previously  
21 adopted rules at OAR 340, Division 120 which implement, in part,  
22 ORS 466.055 and ORS 466.060. These rules distinguish between new  
23 off-site disposal and treatment facilities and on-site  
24 facilities. New on-site facilities are exempted from certain of  
25 the statutory findings enumerated in ORS 466.055.

26 70. The proposed Umatilla incinerator is a proposal for a

1 new on-site treatment facility.

2 71. OAR 340-120-001(4) provides:

3 (4) New hazardous waste and PCB treatment and disposal  
4 facilities, other than land disposal facilities,  
5 located on the site of waste generation (on-site), are  
6 only subject to these parts of Division 120:

- 7 (a) 340-120-010(2)(c) - Technology and Design;
- 8 (b) 340-120-010(2)(e) - Property Line Setback;
- 9 (c) 340-120-010(2)(g) - Owner and Operator  
10 Capability;
- 11 (d) 340-120-010(2)(h) - Compliance History;
- 12 (e) 340-120-020 - Community Participation;
- 13 (f) 340-120-030 - Permit Application Fee.

14 72. OAR 340-120-010(2)(c) requires:

- 15 (c) *Technology and Design.* The facility shall  
16 use the best available technology as  
17 determined by the [Commission] for treatment  
18 and disposal of hazardous waste and PCB. The  
19 facility shall use the highest and best  
20 practicable treatment and/or control as  
21 determined by the [Commission] to protect  
22 public health and safety and the environment.

23 73. The Commission has broad discretion in determining the  
24 parameters for a BAT determination under OAR 340-120-010(2)(c).

25 In the absence of statutory or regulatory criteria, it is  
26 appropriate for the Commission to select specific criteria for  
evaluating best available technology on a case-specific basis.

74. Appropriate criteria for evaluating best available  
technology in this matter include the following:

- 22 A. Types, quantities and toxicity of discharges to  
23 the environment by operation of the proposed  
24 facility compared to the alternative technologies.
- 25 B. Risks of discharge from a catastrophic event or  
26 mechanical breakdown in operation of the proposed  
facility compared to the alternative technologies.
- C. Safety of the operations of the proposed facility  
compared to the alternative technologies.

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2 D. The rapidity with which each of the technologies  
3 can destroy the stockpile.

4 E. Impacts that each of the technologies have on  
5 consumption of natural resources.

6 F. Time required to test the technology and have it  
7 fully operational; impacts of time on overall risk  
8 of stockpile storage.

9 75. Applying the BAT criteria adopted by the Commission and  
10 based on the administrative record the Army's proposed  
11 incineration technology satisfies the requirements for use of  
12 best available technology for destruction of agent at Umatilla.  
13 With the inclusion of carbon filters the proposed incineration  
14 technology will also employ the highest and best practicable  
15 emission control technology. The Commission's rationale for this  
16 finding includes the following considerations which are supported  
17 in detail by the record:

18 A. The proposed incineration technology is designed to  
19 have only minimal emissions of pollutants to the environment and  
20 will achieve an extremely high agent destruction removal  
21 efficiency (so-called six "9s" efficiency). The incineration  
22 technology may result in extremely minute air emissions including  
23 agent, metals, dioxins or similar chlorinated compounds.

24 However, in addition to being extremely small, these emissions  
25 will be temporary and well within allowable regulatory limits.

26 B. The proposed incineration technology is designed with a  
high level of redundancy to minimize risk of discharge from a  
catastrophic event or mechanical breakdown in operation. Each

1 alternative technology reviewed would involve at least similar  
2 and potentially greater operational risks, each alternative has  
3 significant technical uncertainties, and none has been subjected  
4 to the kind of actual testing and operation the baseline  
5 technology has undergone.

6 C. The proposed incineration technology has been designed  
7 and tested for safety in operations at other facilities. Actual  
8 experience with internal system release detection and containment  
9 exists. Alternative technologies reviewed pose technical safety  
10 issues and there is no experience with operations.

11 D. The proposed incineration technology is currently  
12 available and will result in the most rapid destruction of the  
13 agent stored at Umatilla, a factor that must be juxtaposed to the  
14 risk of continued storage.

15 E. Alternative technologies reviewed, with the exception  
16 of neutralization, are years away from actual operational  
17 availability.

18 F. Neutralization technology for HD, while currently  
19 undergoing laboratory bench-scale study, would entail lengthy  
20 delay at Umatilla due, among other constraints, to the need for  
21 staging of construction to allow energetics destruction by  
22 incineration prior to construction and operation of  
23 neutralization facilities.

24 G. With the exception of neutralization, technologies  
25 reviewed appear to involve little impact on natural resource  
26 consumption. Neutralization of HD could, however, have

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2 significant implications for water consumption and disposal, and  
3 would need substantial ecological impact analyses.

4 H. Alternative technologies reviewed face testing and  
5 operational hurdles which would add years of delay to the agent  
6 destruction program at Umatilla.

7 I. Comparative costs of alternative technologies is  
8 considered a factor only with respect to neutralization of HD  
9 which would add significantly to costs of agent destruction at  
10 Umatilla by necessitating construction of a neutralization  
11 facility in addition to the proposed incinerators.

12 In making the above findings with respect to best available  
13 technology, the Commission is particularly persuaded by the  
14 analysis of alternative technologies in BEST AVAILABLE TECHNOLOGY  
15 FINDINGS REPORT UMATILLA CHEMICAL DEPOT, November 1996, prepared for the  
16 Department by Ecology and Environment, Inc.; the REPORT ON DIOXINS,  
17 by Kristina Iisa, Oregon State University, October 1996 and  
18 testimony of Dr. Iisa before the Commission; testimony of Army  
19 Assistant Secretary Decker and staff provided on November 22,  
20 1996 concerning extensive delays associated with alternative  
21 technologies and potential natural resource impacts of bulk agent  
22 neutralization technology.

23 76. OAR 340-120-010(2)(e) requires:

24 (e) *Property Line Setback:*

25 (A) Hazardous waste and PCB treatment and  
26 disposal facilities, other than land disposal  
facilities, on the site of waste generation shall have  
at least a 250 foot separation between active waste  
management areas and facilities, and property

boundaries.

77. The proposed facility meets the requirement of a 250 foot setback from the property line. The proposed facility would be significantly more than 250 feet (nearly one mile) from the nearest Umatilla Chemical Depot boundary.

78. OAR 340-120-010(2)(g) requires:

(g) *Owner and Operator Capability.* The owner, any parent company of the owner and the operator must demonstrate adequate financial and technical capability to properly construct and operate the facility. As evidence of financial capability, the following shall be submitted:

(A) Financial statements of the owner, any parent company of the owner, and the operator audited by an independent certified public accountant for three years immediately prior to the application;

(b) The estimated costs of construction and a plan detailing how the construction will be funded; and

(c) A three year projection, from the date the facility is scheduled to begin operating, of revenues and expenditures related to operating the facility. The projection should have sufficient detail to determine the financial capability of the owner, any parent company of the owner and the operator to properly operate the facility.

79. The Army will be the owner and principally responsible operator of the proposed facility. The Army has the legal responsibility to conduct the chemical weapons demilitarization program. The Army is currently managing operation of several agent incineration facilities. Although operations at the existing facilities have not been entirely without problems, the evidence is that the Army has adequately demonstrated the capability to properly construct and operate the facility.

The Army, as a department of the federal government, is exempt from hazardous waste law financial responsibility

1 requirements. However, private contractors, when selected, must  
2 demonstrate required financial responsibility as well as  
3 technical capability.

4 The Army has the capability to construct and operate the  
5 proposed facility. When a contractor is selected, a hazardous  
6 waste treatment permit modification will be required to make that  
7 contractor a co-permittee, and the contractor will then be  
8 required to demonstrate technical and financial capability as  
9 well.

10 80. OAR 340-120-010(2)(h) requires:

11 (h) *Compliance History.*

12 (a) The compliance history in owning and  
13 operating other similar facilities, if any, must  
14 indicate that the owner, any parent company of the  
15 owner and the operator have an ability and willingness  
16 to operate the proposed facility in compliance with the  
17 provisions of ORS 466 and any permit conditions that  
18 may be issued by the Department or Commission. As  
19 evidence of ability and willingness, the following  
20 shall be submitted:

21 (i) A listing of all responses to past actual  
22 violations identified by EPA or the appropriate state  
23 regulatory agency within the five years immediately  
24 preceding the filing of the requests for an  
25 Authorization to Proceed at any similar facility owned  
26 or operated by the applicant, owner, any parent company  
of the owner or operator during the period when the  
actions causing the violations occurred; and

(ii) Any written correspondence from EPA and the  
appropriate state regulatory agency which discusses the  
present compliance status of any similar facility owned  
or operated by the applicant, owner, any parent company  
of the owner or operator.

(B) Upon request of the Department, the applicant  
shall also provide responses to the past violations  
identified prior to the five years preceding the filing  
of an Authorization to Proceed and the specific  
compliance history for a particular facility owned or  
operated by the applicant, any parent company of the  
owner or operator.

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2 81. The Department staff report of November 1996 outlines  
3 in some detail the Army's compliance history at Johnston Atoll  
4 Chemical Agent Disposal (JACADs) facility and the Tooele Chemical  
5 Disposal facility, both considered relevant to the Commission's  
6 evaluation of the Army's compliance history for purposes of the  
7 pending permit application. While instances of non-compliance by  
8 the Army have been documented, most have been deemed relatively  
9 minor in nature and appropriate corrective actions have been  
10 taken by the Army to address the few more serious violations.  
11 The Department has had no unresolvable enforcement problems with  
12 respect to existing hazardous waste activities at the Umatilla  
13 Chemical Depot.

14 82. The regulations pertaining to the management of  
15 hazardous waste are voluminous and complex; nevertheless, strict  
16 enforcement is warranted. However, it is not unusual for a  
17 hazardous waste facility undergoing a compliance inspection to  
18 have violations, especially in the area of recordkeeping. The  
19 permit applicant has often self-reported permit violations at  
20 other facilities. The Army as owner and operator of the proposed  
21 Umatilla facility has demonstrated sufficient ability and  
22 willingness to operate the proposed facility in compliance with  
23 statutory and regulatory provisions.

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1 ///

2 83. OAR 340-120-020 requires:

3 **Community Participation**

4 340-120-020 (1) The Commission finds that local  
5 community participation is important in the siting and  
6 in reviewing the design, construction and operation of  
7 hazardous waste and PCB treatment and disposal  
8 facilities.

9 ...

10 (3) The Director may appoint a committee [citizen  
11 committee] to review a proposed facility described in  
12 rule 340-120-001(4).

13 84. In view of the existing Governor's Advisory Committee,  
14 the Director has not appointed an additional citizens committee  
15 pursuant to OAR 340-120-020(3).

16 The Department and the Commission have engaged in an  
17 extensive effort to encourage both local and non-local citizen  
18 involvement in this permit application process. The extent of  
19 these efforts is reflected in the Commission's General Background  
20 Findings and in the administrative record. There has been  
21 opportunity for public input on all aspects of the permit  
22 application process including the health and ecological risk  
23 assessments and the legally required Commission findings. The  
24 public involvement has greatly assisted the Commission in its  
25 decisions.

26 85. ORS 466.055(5) requires a Commission finding that:

27 (5) The proposed hazardous waste or PCB treatment  
28 or disposal facility has no major adverse effect on  
29 either:

- 30 (a) Public health and safety; or  
31 (b) Environment of adjacent lands.

32 The detailed human health and ecological risk assessments

1 conducted by the Army and by the Department did not show that the  
2 proposed facility will have major adverse effects on either human  
3 health and safety or the environment. The proposed facility uses  
4 engineering process controls and state of the art pollution  
5 abatement systems which will undergo extensive testing before  
6 operations commence. Revised permit conditions incorporate  
7 additional safeguards as specifically directed by the Commission  
8 at its meeting in Pendleton, Oregon on November 22, 1996. The  
9 proposed facility, if operated as designed and in accordance with  
10 the permit, will not have any major adverse effect on public  
11 health and safety, or to the environment of adjacent lands.

12 In making the above finding regarding no adverse effects,  
13 the Commission is particularly persuaded by the REPORT ON DIOXINS by  
14 Kristina Iisa, Oregon State University, October 1996, and Dr.  
15 Iisa's testimony before the Commission; the DRAFT PRE-TRIAL RISK  
16 ASSESSMENT PROPOSED UMATILLA CHEMICAL DEMILITARIZATION FACILITY, HERMISTON,  
17 OREGON, Vols. I and II prepared by Ecology and Environment, Inc.,  
18 April 1996; PERSPECTIVES ON THE UMATILLA QUANTITATIVE RISK ASSESSMENT  
19 RESULTS prepared by SAIC, September 1996 and testimony of Gary  
20 Boyd, SAIC, before the Commission November 22, 1996; and DEQ AND  
21 ECOLOGY & ENVIRONMENT RESPONSE TO RISK ASSESSMENT ISSUES, July 11, 1996

22 86. ORS 466.055(4) (a) requires a Commission finding that:

23 (4) The need for the facility is demonstrated by:

24 (a) Lack of adequate current treatment or  
25 disposal capacity in Oregon, Washington, Idaho, and  
26 Alaska to handle hazardous waste or PCB generated by  
Oregon Companies;

(b) A finding that operation of the proposed  
facility would result in a higher level of protection  
of the public health and safety or environment; or

(c) Significantly lower treatment or disposal costs to Oregon Companies.

The proposed facility is a non-commercial, sole purpose on-site treatment facility. The requirements of ORS 466.055(4) are directed at commercial facilities. Nevertheless, the Commission finds that the operation of the proposed facility will reduce, and eventually eliminate, the risk to surrounding communities from continued storage of the chemical agents and munitions for which there is presently no disposal option. The need for the facility is demonstrated because operation of the proposed facility will result in a higher level of protection for public health and safety and for the environment.

Now, therefore, IT IS ORDERED that:

1. These findings, conclusions and order shall constitute the Commission's final permit decision and response to public input.

2. Nothing contained herein shall be deemed to waive or restrict any authority of the Commission or any other entity of the State of Oregon to take such action as may be deemed necessary within the scope of their respective authorities to prevent or abate an imminent hazard to public health or the environment.

3. These findings, conclusions and order are based upon representation of the permittee and evidence in the administrative record. Upon evidence of any material misrepresentation or material change in facts, the Commission reserves the right, in its discretion, to reopen these

1 proceedings.

2 4. The Commission shall issue the hazardous waste  
3 treatment permit to the United States Army containing the terms  
4 and conditions agreed upon by the Commission as of the date of  
5 this Order, including those additional permit conditions  
6 specifically ordered by the Commission as reflected in Attachment  
7 A to Appendix 3 which is incorporated herein.

8 5. This Order shall be an Order In Other Than A Contested  
9 Case, and no administrative appeal of the permit shall be  
10 provided to the applicant or third parties.

11 DATED this 10<sup>th</sup> day of February, 1997.

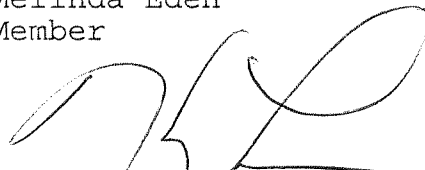
12  
13 Henry Lorenzen  
14 Chair

15 Carol A. Whipple  
16 Vice-Chair

17 Linda A. McMahan  
18 Member

19 Tony Van Vliet  
20 Member

21 Melinda Eden  
22 Member

23   
24 Henry Lorenzen, Chair  
25 For the Environmental Quality Commission

26 LE:kt/LHE0336B.PLE

Index of Administrative File  
Appendix 1

Item #	Heading #	Heading	Document	Type
15	1	Part A	RCRA Permit Application	3 6 95 Letter
1	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
2	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
3	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
4	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
5	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
6	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
7	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
8	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
9	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
10	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
11	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
12	1	Part B	RCRA HW Permit Application for Dept of the Arm	2 0 95 Applctn
13	1	Part B	RCRA Application NOD Response	2 0 95 Applctn
14	1	Part B	RCRA Application Change Page Summaries	2 0 95 Applctn
16	1	Part A	Draft Part A: RI/FS Work Plan	1 0 90 WrkPlan
2271	2	Part B	UMCDF RCRA & Air Final Response/Change Pages	3 21 96 ChngePages
2017	3	Environ. Permits	Draft Hazardous Waste Permit	4 5 96 Permit
2117	4	Part B Support	Does Toole Data Demonstrate Compliance?	10 8 96 Memo
1844	4	Part B Support	Example of On-site Container Drawing Specific	10 4 96 Dwing/Memo
1669	4	Part B Support	Utah Federal Court Decision	8 13 96 Legal Doc
1831	4	Part B Support	Reports Regarding Steve Jones Allegations	5 22 96 Reports
1832	4	Part B Support	JACADs Weekly Feed/Incident Reports	5 13 96 Reports
2118	4	Part B Support	Table 6-16 Left Out of HW Permit	5 10 96 Memo
1464	4	Part B Support	Add'l Items to Address as a Rslt of Chnge Page	4 5 96 Letter
1462	4	Part B Support	Add'l Items to Address as a Rslt of Chnge Page	4 5 96 Letter
1463	4	Part B Support	Notification of Complete Application	4 4 96 Letter
1256	4	Part B Support	Comments on the RCRA & CAA Permits for UMCDF	4 3 96 Letter
1460	4	Part B Support	UMCDF Permit Application Comments	3 28 96 Fax
1369	4	Part B Support	Follow-up to 7/17/95 Alabama Meeting	3 26 96 Fax
1461	4	Part B Support	Comments on Draft HW Permit from Region 10	3 25 96 Comments
1843	4	Part B Support	Submitting RCRA Part B Application Change Page	3 21 96 Letter
1368	4	Part B Support	Follow Up To Request of:ANCDF HRA	3 15 96 Letter
1628	4	Part B Support	BDAT Minimum Technology Standard: RCRA	3 15 96 Memo
1798	4	Part B Support	1995 Annual Report of RCRA Noncompliance JACAD	3 15 96 Report
1367	4	Part B Support	Requested Info. on 3 Issues on 2-1-96	2 20 96 Letter
1046	4	Part B Support	RCRA Permit Quality Protocol	2 1 96 Memo/Chklst
1045	4	Part B Support	Umatilla Army Incinerators Permitting	1 29 96 Memo
1459	4	Part B Support	UMCDF Preliminary RCRA Draft Permit General	1 24 96 Comments
1044	4	Part B Support	Draft Umatilla Army Incin. Permitting Proc.	1 8 96 Memo
965	4	Part B Support	Permit Issuance Authority	7 13 95 Memo
1670	4	Part B Support	DataChem Lab Nitroglycerin/PETN Method	7 10 95 Report
17	4	Part B Support	Revisions of Draft Protocol RCRA Part B	7 29 94 Memo

Item B 000117

Index of Administrative File  
Appendix 1

1023	4	Part B Support	RCRA Permit Application Update	6	1	93	Report
1024	4	Part B Support	RCRA Permit Application Update	6	1	93	Report
1506	4	Part B Support	Liability of Federal Government Question	12	13	90	Memo
21	4	Part B Support	RCRA Part B Checklist	4	23	90	Report
24	4	Part B Support	RCRA Part B Application Completeness Technical	8	0	89	Chklist
1739	4	Part B Support	Request for Written Opinion on Applicability	4	28	88	Memo
25	4	Part B Support	RCRA Part B Application Checklist Enclosure 3	2	12	88	Chklist
67	4	Part B Support	Contractors Liability	2	4	88	Memo
26	4	Part B Support	CBI For RCRA HW Permit Application-May 1987	5	0	87	Rqst
22	4	Part B Support	Completeness/Technical Evaluation Checklist	10	22	86	Chklist
27	4	Part B Support	UMDA RCRA Application	10	16	86	Spdltr
28	4	Part B Support	Request for Extension, CBI For RCRA HW Prmt	9	0	86	Rqst
29	4	Part B Support	Proprietary Data of Trane Thermal-Blueprints	9	0	86	Rqst
30	4	Part B Support	Request for 40 CFR 264.340 Exemption (RCRA)	4	0	84	Report
31	4	Part B Support	RCRA Part B Permit Application Checklist	0	0	0	Chklist
32	4	Part B Support	Contingency Plan, Annex C Plan, Offsite Evactn	0	0	0	Notes
33	4	Part B Support	DOD Compliance History	0	0	0	Report
1025	4	Part B Support	Anniston Carbon Filter Design Package Specfctn	0	0	0	Report
1153	4	Part B Support	Process for Contested Case Hearings	0	0	0	Notes
34	5	NODs	NOD No. 5, Attachment A Included	3	15	94	Report
1026	5	NODs	NOD Review Comments RCRA Permit Application	6	0	93	Report
35	5	NODs	Notice of Permit Application NOD	4	21	93	Report
36	5	NODs	NOD Review Comments RCRA Permit Application	11	4	92	Table
1027	5	NODs	NOD Review Comments Umatilla Supplement A	11	4	92	Report
1028	5	NODs	NOD Review Comments Umatilla Supplement B	11	4	92	Report
1029	5	NODs	NOD Review Comments Umatilla Supplement C	11	4	92	Report
1030	5	NODs	NOD Review Comments Umatilla	11	4	92	Report
1659	5	NODs	NOD Review Comments - Clean Change Pages	11	4	92	NODs
20	5	NODs	Issues/Comments on UMDA	11	4	92	Report
37	5	NODs	NOD Review Comments for Anniston Air & RCRA	8	30	92	Report
39	5	NODs	NOD, Deficiencies Not Addressed	1	21	92	Letter
41	5	NODs	NOD Draft, 9-30-91, UMDA-CSDP	12	5	91	Memo/Fax
2035	5	NODs	NOD, Adequacy of Explosives Handling	10	1	90	Report
42	5	NODs	NOD for CSDP, Summary of Responses	8	6	90	Report
44	5	NODs	Compliance Order HW-ER-89-67	1	5	90	Letter
45	5	NODs	Certfctn Required by Violtn & Compliance Ord	1	3	89	Letter
48	5	NODs	Final NOD Review, Review of Safety Procedures	1	3	89	Letter
2325	5	NODs	Request for Exemption Denied Based on Findings	2	10	88	Letter
2326	5	NODs	Meeting to Specify What is Needed for NOD Rspn	2	3	88	Fax/Memo
2327	5	NODs	On-Site Inspection Observations From 8/3/87	1	22	88	Letter
2328	5	NODs	Comments on the Revised Part B	1	0	88	Comments
49	5	NODs	Prog. Mngr for Chem. Munitns	9	24	87	Report
50	5	NODs	Tech. Evaluatn NOD & Checklist	8	28	87	Report
52	5	NODs	NOD and Warning Letter, Provides Recommendation	2	17	87	Letter
57	5	NODs	Matrix of NODs on CAD Incinerators	0	0	0	Charts
1370	6	Response to NODs	UMCDF RCRA Part B Change Pages Request	3	6	96	Letter

Index of Administrative File  
Appendix 1

60	6	Response to NODs	RCRA HW Permit Application for Anniston CSDP	10	0	94	Report
62	6	Response to NODs	Education of Citizens	9	14	94	Letter
63	6	Response to NODs	11/3/89 Letter Response	11	22	89	Letter
64	6	Response to NODs	Unatilla Army Depot Incinerator Project	3	8	89	Letter
2331	6	Response to NODs	Preliminary Design Review	11	18	88	Letter
65	6	Response to NODs	Comments on Summary of Army Responses	11	17	88	Letter
66	6	Response to NODs	Response to Letter, Applicability of HSWA Stat	11	14	88	Letter
68	6	Response to NODs	Operational Contractor May Not Be Liable	2	12	88	Letter
72	6	Response to NODs	EPA Response to Final EIS	2	9	88	Letter
73	6	Response to NODs	Comments: CSDP; Final Programmatic EIS	2	5	88	Letter
69	6	Response to NODs	Request for Additional Docs and Information	4	8	87	Letter
70	6	Response to NODs	Response to Request, Compiled Summary Events	4	2	87	Letter
71	6	Response to NODs	Meeting on Health Aspects of Emergency Respons	3	20	87	Letter
2251	7	Official Comments	Public Comments	11	19	96	Memo
2252	7	Official Comments	Public Comments	11	18	96	Memo
2219	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	16	96	Letter
2249	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	16	96	Letter
2195	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2215	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2217	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2223	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2222	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2225	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2224	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2228	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2230	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2229	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2227	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2226	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2246	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Report
2267	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Rpt/Lttr
2266	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Rpt/Lttr
2212	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Rpt/Lttr
2231	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2194	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2218	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2197	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2220	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2221	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2234	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2241	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2250	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2248	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2260	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2216	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2193	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter

Item B 000119



Index of Administrative File  
Appendix 1

2237	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	13	96	Letter
2238	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	13	96	Letter
2192	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	12	96	Letter
2243	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	12	96	Letter
2244	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	12	96	Letter
2190	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	9	96	Letter
2191	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	9	96	Letter
2188	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	11	4	96	Letter
2185	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	31	96	Letter
2187	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	30	96	Letter
2186	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	30	96	Letter
2184	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	28	96	Letter
2182	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	22	96	Letter
2183	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	21	96	Letter
2180	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	10	17	96	Letter
2177	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	9	24	96	Letter
2178	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	9	24	96	Letter
2181	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	9	23	96	Letter
2189	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	9	1	96	Letter
2171	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	23	96	Letter
2167	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	22	96	Letter
2168	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	22	96	Letter
2169	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	22	96	Letter
2170	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	22	96	Letter
2172	7	Official Comments	Public Comments		8	22	96	Testimony
2165	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	13	96	Letter
2179	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	11	96	Letter
2175	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	8	1	96	Letter
2174	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	7	10	96	Letter
2214	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	14	96	Letter
1786	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	13	96	Letter
1787	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	13	96	Letter
2164	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	13	96	Letter
2176	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	12	96	Letter
1791	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	12	96	Letter
2256	7	Official Comments	Public Comments From Hermiston Public Hearing		6	10	96	Transcript
1785	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	10	96	Letter
2173	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	10	96	Letter
2211	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	10	96	Letter
2210	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	10	96	Letter
2209	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	10	96	Letter
2213	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	10	96	Letter
2205	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	9	96	Letter
2255	7	Official Comments	Public Comments From Pendleton Public Hearing		6	7	96	Transcript
2204	7	Official Comments	Public Comments Received	4/5/96 to 11/15/96	6	6	96	Letter
2254	7	Official Comments	Public Comments from Kennewick Public Hearing		6	5	96	Transcript

Index of Administrative File  
Appendix 1

2206	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	2	96	Letter
1784	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	30	96	Letter
1790	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	30	96	Letter
2200	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Letter
2201	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Letter
2202	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Letter
2232	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Statemnt
2253	7 Official Comments	Public Comments Received From PDX Pblc Hearing	5	29	96	Testimony
2203	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	28	96	Letter
1788	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	15	96	Letter
1783	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	29	96	Letter
1789	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	26	96	Letter
2198	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	26	96	Letter
1782	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	25	96	Letter
1781	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	19	96	Letter
1780	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	15	96	Letter
1779	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	12	96	Letter
1692	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	12	96	Report
1778	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	11	96	Letter
1777	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	9	96	Letter
1776	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	7	96	Letter
1773	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	5	96	Letter
1771	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	3	29	96	Letter
1770	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	3	20	96	Letter
2196	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	27	95	Letter
2208	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	22	95	Letter
2199	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	22	95	Letter
2247	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	86	Report
2166	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Report
2245	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2242	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2240	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2239	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2233	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2236	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2235	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2232	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2207	7 Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Drawings
2264	8 Public Notices	UAD Public Comments By CTUIR	11	15	96	Comments
22265	8 Public Notices	UAD Public Comments By Karyn Jones	11	15	96	Comments
1729	8 Public Notices	"Your Opinion Counts!"-for 8/22-23/96 EQC Mtg	8	20	96	NewsAdv
1683	8 Public Notices	"Your Opinion Counts!"-Info Meeting Notice	8	17	96	NewsArt
1675	8 Public Notices	"Your Opinion Counts!"-Info Meeting Notice	8	3	96	NewsArt
2263	8 Public Notices	UAD Public Comments 6/17/96-11/15/96	6	17	96	Comments
1565	8 Public Notices	Chance to Comment on Extension, Comment Period	6	17	96	ChnceCommnt
1566	8 Public Notices	Chance to Comment on Extension, Comment Period	6	17	96	NewsArt

Item B 000121

Index of Administrative File  
Appendix 1

2158	8	Public Notices	Umatilla Public Hearing, Tape 1, Hermiston	6	10	96	Cassette
2159	8	Public Notices	Umatilla Public Hearing, Tape 2, Hermiston	6	10	96	Cassette
2160	8	Public Notices	Umatilla Demilitarization Public Hearing Tape	5	29	96	Cassette
2161	8	Public Notices	Umatilla Demilitarization Public Hearing Tape	5	29	96	Cassette
2162	8	Public Notices	Umatilla Army Depot Public Hearing, Pendleton	5	13	96	Cassette
2262	8	Public Notices	UAD Public Comments 5/13/96-6/17/96	5	13	96	Comments
1447	8	Public Notices	Chance to Comments	4	5	96	NewsArt
1562	8	Public Notices	Chance to Comment on Findings and Risk Asses.	4	5	96	ChnceCommnt
1563	8	Public Notices	Chance to Comment on Proposed Haz Waste Permit	4	5	96	ChnceCommnt
1564	8	Public Notices	Chance to Comment on Proposed Air Quality Prmt	4	5	96	ChnceCommnt
1841	8	Public Notices	Fact Sheet for Draft HW Trtmt & Storage Prmt	4	5	96	Fact Sheet
886	8	Public Notices	Treatment/Storage&Disposal Fac	0	0	0	MagArt
887	8	Public Notices	Closing of Fort McLellan	0	0	0	NewsArt
1966	9	Governor Corres.	Response to letter from JChien	11	8	96	Letter
1967	9	Governor Corres.	GDecker Response to Governors Letter 10/7/96	11	7	96	Letter
1968	9	Governor Corres.	Application Modification and Withdrawal	10	14	96	Letter
2095	9	Governor Corres.	Comments Regarding Chemical Depot	9	4	96	Letter
2110	9	Governor Corres.	Effectiveness of DEQ Staff	7	15	96	Letter
1964	9	Governor Corres.	Regarding Letter of Concerns Regarding Permits	6	28	96	Letter
1962	9	Governor Corres.	Regarding Letter of Concerns on Best Avail Tec	6	20	96	Letter
1963	9	Governor Corres.	Regarding Letter of Concerns on Best Avail Tec	6	20	96	Letter
1531	9	Governor Corres.	Rpt on Status of Umatilla Permitting Decisions	5	31	96	Memo
1792	9	Governor Corres.	Comments Regarding Public Hearing Process	5	30	96	Letter
1961	9	Governor Corres.	CTUIR Letter of 4/26/96 Regarding Proposed Umt	5	15	96	Letter
1960	9	Governor Corres.	Regarding Letter of Concerns for Health & Env.	5	2	96	Letter
1954	9	Governor Corres.	Concerns Regarding Releases by UCD	4	26	96	Letter
1955	9	Governor Corres.	Regarding Letter of Concerns on UCD for Alt Te	4	26	96	Letter
1956	9	Governor Corres.	Regarding Letter of Concerns of Accdntl Contam	4	26	96	Letter
1957	9	Governor Corres.	Regarding Letter for Opinions on Incineration	4	26	96	Letter
1958	9	Governor Corres.	Regarding Phone Call on Burning Toxic Chemical	4	26	96	Letter
1959	9	Governor Corres.	Regarding Letter of Concerns on Incineration	4	26	96	Letter
1851	9	Governor Corres.	5/21 Mtg of Umatilla CAC & Tour of Depot	4	24	96	Memo
1953	9	Governor Corres.	Storage of Nerve Agent Undesirable, Alt Needed	4	3	96	Letter
1952	9	Governor Corres.	Regarding Letter of Concerns for a Delay	3	25	96	Letter
1377	9	Governor Corres.	Regarding Letter Requesting Moratorium on App.	3	19	96	Letter
1378	9	Governor Corres.	Regarding Letter Regarding Delay for Permit Ap	3	19	96	Letter
1379	9	Governor Corres.	Regarding Letter of Concerns for Health & Env.	3	19	96	Letter
1380	9	Governor Corres.	Regarding Letter of Concerns for Health & Env.	3	19	96	Letter
1090	9	Governor Corres.	Move Forward with Incineration	3	13	96	Letter
1371	9	Governor Corres.	Comments to Not Delay the Permit Process	2	21	96	Letter
1951	9	Governor Corres.	Concerns for Enforcement of Env. Standards	1	22	96	Letter
83	9	Governor Corres.	Draft RCRA Munitions Rule	6	20	95	Letter
1950	9	Governor Corres.	Chemical Weapons Incineration at Umatilla	3	19	95	Memo
61	9	Governor Corres.	Responding to Letter on M-55 Rocket Stability	9	14	94	Letter
149	9	Governor Corres.	Prelim Rslit -Risk Reassessment Studies	8	19	94	Letter
227	9	Governor Corres.	Contract from Jeff Blackman	9	8	93	Request

Index of Administrative File  
Appendix 1

228	9 Governor Corres.	Concerns About Proposed Incineration of Chem.	9	6	93	Letter
229	9 Governor Corres.	CDCAC Executive Order No. EO-93-10	8	6	93	Order
241	9 Governor Corres.	May 12 Public Forum	6	10	93	Letter
254	9 Governor Corres.	Contract from Victor Barnett	1	5	93	Request
291	9 Governor Corres.	Proposed Executive Order	4	8	91	Memo
447	9 Governor Corres.	Concern Safety of E. Oregon Communities	0	0	91	Letter
335	9 Governor Corres.	Tour JACADs	11	1	89	Letter
345	9 Governor Corres.	Cleanup of Contamination	7	28	89	Letter
374	9 Governor Corres.	DRAFT: Participants on ICCB	9	22	88	Letter
392	9 Governor Corres.	Concerns on Specific Environmental Assessment	3	2	88	Letter
399	9 Governor Corres.	Concerns on the Proposed Nerve Agent Demil.	12	18	87	Letter
403	9 Governor Corres.	Contractor Liability During Demil.	11	7	87	Letter
464	9 Governor Corres.	Regarding Letter of Concerns	6	3	86	Letter
2261	10 Correspondence	Public Comment Received Ater 11/15/96	11	18	96	Letter
2096	10 Correspondence	Transmittal of Public Comments	11	18	96	Memo
1976	10 Correspondence	Thank you to Professor Lisa For Dioxin Report	11	8	96	Letter
1971	10 Correspondence	Participant Info Request	11	8	96	Letter
2097	10 Correspondence	Agenda Item, ORS 466.055, and Agenda 11/14-15/	10	31	96	Fax
2098	10 Correspondence	Review of Meeting on 10-18	10	30	96	Letter
2099	10 Correspondence	Letter of Appreciation for DEQ Staff	10	24	96	Letter
1972	10 Correspondence	Transmittal of Documents	10	16	96	Memo
1973	10 Correspondence	Questions re: Separation of M55 Rockets	10	14	96	Fax
1838	10 Correspondence	NAC Permission to Photocopy 7 NRC Reports	10	9	96	Letter
1940	10 Correspondence	Request for Permission to Make 7 Copies NRC Rp	10	9	96	Fax/Memo
1845	10 Correspondence	Final UMCDF Phase 1 Quantitative Risk Assessm	10	1	96	Memo
1846	10 Correspondence	Thank You To National Academy Press	10	1	96	Fax/Memo
1974	10 Correspondence	Permission to Make 15 Copies of NRC Report	10	1	96	Fax
1975	10 Correspondence	Request Permission to Make 15 Copies of NRC Rp	10	1	96	Fax/Memo
2100	10 Correspondence	Request for Information	9	23	96	Memo
1847	10 Correspondence	Response Letter to Wendell Ford	9	14	96	Letter
1760	10 Correspondence	Thank You For Your Comments Letter	9	11	96	Letter
1709	10 Correspondence	Request to Review NRC Report on BAT for UMCDF	9	6	96	Letter
1710	10 Correspondence	Request for PAS Carbon Design Opinion for UMCDF	9	6	96	Letter
1759	10 Correspondence	Invitation to The 2nd Env.Forum ChemWeapons...	8	28	96	Letter
1708	10 Correspondence	PMCD Memo Re: EQC Meeting 8/22/96	8	27	96	Memo
1796	10 Correspondence	Denver Dialogue, 7-10-96	8	26	96	Letter
1686	10 Correspondence	Permit Changes to CMassimino	8	21	96	Memo
1795	10 Correspondence	Transmittal of Umatilla Permit Information	8	12	96	Memo
1848	10 Correspondence	Secondary Chamber Feed for HD LIC Trial Burn	8	7	96	Letter
1794	10 Correspondence	Disposal of Chemical Agents & Munitions Stored	8	5	96	Letter
1632	10 Correspondence	Request for Attendance & Travel Cncrning UCD	8	2	96	Letter
1630	10 Correspondence	Request for Attendance & Travel Cncrning UCD	7	30	96	Letter
1631	10 Correspondence	Request for Attendance & Travel Cncrning UCD	7	30	96	Letter
1800	10 Correspondence	Disposal of ChemAgents at Umailia Depot Fnl EI	7	19	96	Letter
1707	10 Correspondence	Ford-Brown Chem Weapons Demil Amendment	7	17	96	Letter
1799	10 Correspondence	Thank You Letter to E&E	7	16	96	Letter

Item B 000123

Index of Administrative File  
Appendix 1

1671	10 Correspondence	Responding to Statements By Army Official	7	15	96 Letter
1797	10 Correspondence	Response letter for request from JHaley	6	28	96 Letter
1610	10 Correspondence	Thank you for Info on CSEPP Plan	6	26	96 Letter
1793	10 Correspondence	Transcript Review Consistent with Mtg. Notes	6	26	96 Letter
1609	10 Correspondence	Response to Comments Regarding Incineration	6	21	96 Letter
2101	10 Correspondence	Resume for Larry Baxter	6	20	96 Fax
1561	10 Correspondence	Transmittal of EQC Alt. Tech. Video	6	17	96 Memo
1608	10 Correspondence	Request for Complete Copy of Part A HW Appl	6	17	96 Letter
1560	10 Correspondence	Provision within AQ Rules Pertaining To Permit	6	14	96 Letter
1607	10 Correspondence	Comments in Response to 6/12/69 Editorial	6	14	96 Letter
1559	10 Correspondence	Response to DTWeten's 6-6-1996 Letter	6	13	96 Letter
1558	10 Correspondence	Conversation w/Jim Long-Oregonian Reporter	6	4	96 Memo
1532	10 Correspondence	Transmittal of Cassettes Pub. Hearing 5/29/96	6	3	96 Memo
1849	10 Correspondence	Summary of Concerns Voiced at 5/29/96 Hearing	6	3	96 Memo
1530	10 Correspondence	Transmittal of UAD Air Dispersion Computr File	5	23	96 Memo
1529	10 Correspondence	Air Dispersion Modeling Files	5	22	96 Letter
1850	10 Correspondence	Request for Pre-Trial Burn RA Air Modeling Fil	5	20	96 Fax
1526	10 Correspondence	Umatilla Incineration Air Modeling Data Access	5	16	96 Memo
1527	10 Correspondence	Increase of Funds Available for Army Research	5	16	96 Memo
1528	10 Correspondence	Misinterpretation of MFurse Statement	5	16	96 Memo
1509	10 Correspondence	Transmittal of Umatilla Diskettes	5	8	96 Memo
1508	10 Correspondence	Transmittal of Requested Copies	5	6	96 Memo
1077	10 Correspondence	Responding to Letter of Concerns of Incineratn	5	6	96 Letter
1507	10 Correspondence	Transmittal of Umatilla Diskettes	4	26	96 Memo
1693	10 Correspondence	Responding to Letter of Concerns	4	24	96 Letter
1473	10 Correspondence	Fax Transmittal of North Carolina Study	4	23	96 Fax
1474	10 Correspondence	Agenda for Portland Mtg. 5/16/96	4	23	96 Fax
1472	10 Correspondence	Transmittal of Umatilla Diskettes	4	19	96 Memo
1471	10 Correspondence	UMCDF Part B Request for Additional Info	4	17	96 Letter
1470	10 Correspondence	JACADS Class 1 Permit Modification Denial	4	5	96 Letter
1469	10 Correspondence	Comments on Chance to Comments Sheets	4	4	96 Comments
1382	10 Correspondence	JACADS Class 2 Permit Modification Approval	3	27	96 Letter
1376	10 Correspondence	Permit Condition Modifications	3	19	96 Fax/Memo
1375	10 Correspondence	Opposition to UMCDF	3	16	96 Letter
1468	10 Correspondence	Comments on Revised EIS from Greenlaw	3	15	96 Comments
1373	10 Correspondence	Revised Draft EIS Comments	3	14	96 Letter
1374	10 Correspondence	EPA Involvement in UMCDF Permitting Decision	3	14	96 Letter
1381	10 Correspondence	EPA Involvement in UMCDF Permitting Decision	3	14	96 Letter
1211	10 Correspondence	JACADS Class 2 Permit Modification Approval	3	12	96 Letter
1209	10 Correspondence	Transmittal of Diskette w/Draft UMCDF Permit	3	11	96 Memo
1210	10 Correspondence	Transmittal of Diskette	3	11	96 Memo
1208	10 Correspondence	Transmittal of Umatilla Draft Permit w/Notes	3	8	96 Memo
1467	10 Correspondence	Sumps Classified As Non-RCRA TOCDF	2	29	96 Letter
1372	10 Correspondence	Dedication for Army Outreach Office	2	28	96 Letter
1155	10 Correspondence	Response to Request for One-Year Moratorium	2	23	96 Letter
1204	10 Correspondence	Request to Review WAP	2	14	96 Fax

Index of Administrative File  
Appendix 1

1053	10 Correspondence	Request for Information	1	27	96	Letter
1188	10 Correspondence	Re: Change in ODEQ Haz Waste Program	1	22	96	Letter
1050	10 Correspondence	JACADS Class One Modification Notices	1	11	96	Letter
1051	10 Correspondence	JACADS RD&D Permit Application	1	11	96	Letter
1048	10 Correspondence	JACADS Class One Modification Notice	1	10	96	Letter
1049	10 Correspondence	JACADS Class One Modification Approval	1	10	96	Letter
1052	10 Correspondence	JACADS Class One Modification Approval	1	10	96	Letter
1186	10 Correspondence	Transmittal of Risk Assessment Documents	1	1	96	Memo
1036	10 Correspondence	Letter Sent with Preliminary Draft Permit	12	29	95	Letter
1035	10 Correspondence	Transmittal of Draft Umatilla Chem Demil Prmt	12	27	95	Memo
74	10 Correspondence	JACADS Class 1 Permit Modification Rejection	12	14	95	Letter
1203	10 Correspondence	JACADS Class 2 Permit Modification Request	11	27	95	Letter
1156	10 Correspondence	Response to Risk Assess. Storage Biggest Risk	11	2	95	Letter
1466	10 Correspondence	Problems Discovered During LIC & DFS Trl Brns	10	31	95	Letter
1201	10 Correspondence	JACADS 14 Class 2 Permit Modification Proposal	10	26	95	Letter
1202	10 Correspondence	JACADS Class 1 Permit Modification Submittals	10	16	95	Letter
75	10 Correspondence	Letter Sent to Morrow County Re: Mtg. Arrngmnt	8	28	95	Memo/Fax
76	10 Correspondence	Revised Scope From Contractors	8	25	95	Memo
1465	10 Correspondence	Information From Agent Monitoring Meeting	8	25	95	Memo
77	10 Correspondence	CTUIR Comments on Draft Pre-Trial Burn RA	8	22	95	Letter
1157	10 Correspondence	JACADS Class 1 Permit Mod. Submittals	8	17	95	Letter
78	10 Correspondence	Qualitative Risk Assessment Contacts	8	11	95	Fax
79	10 Correspondence	Umatilla Project Activities at Hermiston Office	8	8	95	Memo
80	10 Correspondence	JACADS-Army Application for a New Permit	8	1	95	Letter
81	10 Correspondence	JACADS Permit Application Review	7	19	95	Memo
82	10 Correspondence	Pre-Proposed Munitions' Rule	6	21	95	Letter
84	10 Correspondence	Use of STEL or TLV-TWA or Ceiling Limits	6	19	95	Letter
85	10 Correspondence	Performance Evaluation Report	5	24	95	Memo/Fax
86	10 Correspondence	E&E Access to Depot	5	24	95	Letter
87	10 Correspondence	Conforth Ranch as Game Reserve	5	15	95	Memo/Fax
88	10 Correspondence	TOCDF Medical Forms	5	12	95	Memo/Fax
89	10 Correspondence	Closing of Ft. McClellan	5	9	95	Letter
90	10 Correspondence	OR/US Army Cooperative Agreement	5	1	95	Letter
91	10 Correspondence	CSEPP Reentry Restrtn Matrl	4	28	95	Memo
92	10 Correspondence	Inspection of Tooele Depot	4	17	95	Letter
93	10 Correspondence	RCRA Permit Application	4	14	95	Letter
94	10 Correspondence	Chem Agent Stockpile Incin.	3	24	95	Letter
95	10 Correspondence	GAO Letter, Budget Estimates Weapons Dest.	3	17	95	Letter
96	10 Correspondence	Incineration of Stockpile	3	8	95	Letter
97	10 Correspondence	Permit Application, 5X,3X	3	8	95	Memo/Fax
98	10 Correspondence	Class 2 Permit Modification	3	6	95	Letter
99	10 Correspondence	Meteorological Monitoring Plan	2	28	95	Letter
100	10 Correspondence	Class 2 Permt Modifictn, JACADS	2	28	95	Letter
101	10 Correspondence	Proposal Being Postponed	2	27	95	Letter
102	10 Correspondence	Meeting at Umtilla Co. Emer.	2	24	95	Letter

Index of Administrative File  
Appendix 1

448	10 Correspondence	Comments on Applctn by Army for Permit Mod	2	23	95 Letter
103	10 Correspondence	Check Acc., Commission Mtgs.	2	22	95 Memo
104	10 Correspondence	Mtg. at Lutheran Church	2	20	95 Letter
1034	10 Correspondence	Narrative Postn Descriptns Demil Project	2	8	95 Memo
1637	10 Correspondence	UMDA Meteorological Station Systems Audit	2	1	95 Letter
105	10 Correspondence	Extension Granted to Army-NOD	1	24	95 Letter
106	10 Correspondence	GAO Report on Chemical Weapons	1	13	95 Memo/Rpt
107	10 Correspondence	Approval Resp. Extension NOD#5	12	22	94 Letter
108	10 Correspondence	FEMA Agreement EMS-94-K-0327	12	22	94 Letter
109	10 Correspondence	Update on Workplan	12	16	94 Memo/Fax
110	10 Correspondence	Solicit Input Army's Criteria	11	23	94 Letter
111	10 Correspondence	Permit Review	11	22	94 Letter
112	10 Correspondence	HW Compliance Inspection	11	21	94 Letter
113	10 Correspondence	Update on Response to NOD	11	20	94 Letter
114	10 Correspondence	Meeting Notice for Open House	11	16	94 Notice
115	10 Correspondence	Meteorological Monitoring Plan	11	15	94 Letter
116	10 Correspondence	PAS Air Filter System	11	14	94 Letter
117	10 Correspondence	Site Visit @ MD, UT, & OR	11	4	94 Letter
118	10 Correspondence	Transmittal of Documents	11	4	94 Memo
119	10 Correspondence	Met Station Information Update	11	1	94 Memo
120	10 Correspondence	Upcoming DEQ Open House	11	1	94 Letter
121	10 Correspondence	Risk Assumptions Proposal	10	31	94 Fax/Memo
122	10 Correspondence	Address as Follow	10	26	94 Fax
123	10 Correspondence	Nov Emergency Board Letter	10	26	94 Fax
124	10 Correspondence	Weapons Destrctn Prog. Report	10	21	94 Letter
125	10 Correspondence	WkGrp Rev-Eval of Method 0010	10	17	94 Letter
126	10 Correspondence	DEQ Open House in Hermiston	10	17	94 Memo
127	10 Correspondence	EPA - US ARMY Meeting Outline	10	11	94 Outline
128	10 Correspondence	UT-DEQ Risk Assessment Status	10	11	94 Letter
129	10 Correspondence	Demil Cit Adv Comm Period Extn	10	11	94 Letter
130	10 Correspondence	DOA Concerns Chem Demil Prmt	10	11	94 Memo
131	10 Correspondence	On-Site Meteorological Station	10	10	94 Fax/Memo
132	10 Correspondence	Bullet Summary of Fed FY 95	10	5	94 Fax/Memo
133	10 Correspondence	Site Visits, Questions, Pine Bluff	10	5	94 Letter
134	10 Correspondence	Supplemental RI Study Sites	10	4	94 Letter
135	10 Correspondence	Comment-60% Remedial Design	9	28	94 Memo
136	10 Correspondence	Two Regulations Attached	9	21	94 Fax/Memo
137	10 Correspondence	Technical Conference	9	20	94 Flyer
138	10 Correspondence	Draft Notes Meeting on ANCDF	9	20	94 Memo
139	10 Correspondence	Interview with Steve Jones	9	20	94 Stment
140	10 Correspondence	Recent Study of M-55 Rocket	9	14	94 Letter
141	10 Correspondence	Response to Info Request Lettr	9	14	94 Letter
142	10 Correspondence	Request for Ext to Resp to NOD	9	9	94 Letter
143	10 Correspondence	Request for Ext to Resp to NOD	9	9	94 Letter
144	10 Correspondence	Follow-up / Subcommittee Wkgrp	9	8	94 Letter

Index of Administrative File  
Appendix 1

145	10 Correspondence	Draft Risk Assessment-Anniston	8	30	94	Letter
146	10 Correspondence	Remedial Design Reports	8	29	94	Letter
147	10 Correspondence	Draft Cooperative Agreement	8	24	94	Letter
148	10 Correspondence	Mailing List for Umatilla	8	22	94	Letter
150	10 Correspondence	What if the DEQ & EPA issue a Final Permit?	8	12	94	Fax
151	10 Correspondence	Fact Sheets	8	9	94	Letter
152	10 Correspondence	Ext to Submit Resp to NOD #5	8	8	94	Letter
153	10 Correspondence	Response to USACMDA-HW Permit	8	8	94	Letter
154	10 Correspondence	Activity Summary	8	4	94	Letter
155	10 Correspondence	Validation Testing by RADIATION	8	3	94	Fax
156	10 Correspondence	RCRA Comments on Umatilla RODs	8	3	94	Memo
157	10 Correspondence	ADA Operable Unit Workplan	8	1	94	WkPlan
158	10 Correspondence	Carbon Filter System Summary	7	29	94	Letter
160	10 Correspondence	Items for Review/Files	7	29	94	Memo
159	10 Correspondence	Affitional Comments from Peer Review	7	28	94	Fax
160	10 Correspondence	Phone Conv - Risk Analysis	7	28	94	Memo
161	10 Correspondence	Records fo Decisions- Signed	7	27	94	Letter
162	10 Correspondence	Preliminary Rslt-RADIATION's Test	7	26	94	Fax
163	10 Correspondence	Task Order No. 64-93-10	7	25	94	Letter
164	10 Correspondence	Technical Conference	7	25	94	Letter
165	10 Correspondence	Public Assessment Survey/draft	7	6	94	Fax
166	10 Correspondence	Notification to Update Permit	7	5	94	Letter
167	10 Correspondence	2 Proposed Records of Decision	6	30	94	Memo
168	10 Correspondence	Testimony Before Senate Interim	6	29	94	Testimony
169	10 Correspondence	Ext Request Resp NOD #5 Delay	6	28	94	Memo
170	10 Correspondence	Systemization Process - Tooele	6	24	94	Letter
171	10 Correspondence	"Permitting Fact Sheet Draft 2	6	23	94	E-Mail
172	10 Correspondence	Miscellaneous Umatilla Issues	6	23	94	E-Mail
173	10 Correspondence	Risk Assessment Meeting	6	21	94	Notes
174	10 Correspondence	Meeting Notes-Advisory Comm	6	21	94	E-Mail
175	10 Correspondence	Risk Assessment Meeting	6	17	94	Fax/Agnda
176	10 Correspondence	Comments on Draft Fact Sheet#2	6	10	94	Memo
177	10 Correspondence	Selection of CDCAC Chairperson	6	9	94	Letter
178	10 Correspondence	GB Rocket Fire Incident Report	6	8	94	Letter
179	10 Correspondence	RCRA & Air Emissions Issues	6	7	94	Letter
181	10 Correspondence	Indirect HRA for TOCDF	5	26	94	Letter
182	10 Correspondence	Agency Reorganization	5	26	94	Letter
183	10 Correspondence	NOD Cover Letter	5	19	94	Memo
184	10 Correspondence	HW Permitting Status	5	13	94	Memo
185	10 Correspondence	Chem Demil Mtg/ Draft Comments	5	11	94	Memo
186	10 Correspondence	Chem Demil Mtg/ Draft Comments	5	6	94	Memo
187	10 Correspondence	Activity Summary	5	3	94	Letter
188	10 Correspondence	Cooperative Agreement/draft	4	29	94	Letter
189	10 Correspondence	List of References	4	28	94	Memo
190	10 Correspondence	Demil Permit Processing Mtg	4	20	94	Outline
191	10 Correspondence	Carbon Filter Sys Perf Rpt-Rev	4	19	94	Letter



Index of Administrative File  
Appendix 1

192	10 Correspondence	Comments on 5X Test Plan	4	15	94 Letter
193	10 Correspondence	Assessment of Alt. Tech. Rprt	4	12	94 Letter
194	10 Correspondence	ADA at Umatilla Depot	4	12	94 E-Mail
195	10 Correspondence	UAD Budget Meeting	3	29	94 E-Mail
196	10 Correspondence	GB Release from the Common Stack	3	23	94 Report
197	10 Correspondence	NOD #5	3	15	94 Letter
198	10 Correspondence	Response to US Army's Plan to Incinerate	3	14	94 Letter
199	10 Correspondence	DEQ's Comments for the USACMDA	3	11	94 Memo
200	10 Correspondence	Follow-up Phone Convrsn w/ TMiller	3	3	94 Letter
201	10 Correspondence	Proposed Cleanup Plans Mtg	3	2	94 Agenda
202	10 Correspondence	Annual HW Generation Report	2	23	94 Letter
203	10 Correspondence	Chem Demil Cit Adv Comm Mtg	2	13	94 Fax/Agenda
204	10 Correspondence	EPA's Response to the NRC Report	2	9	94 E-Mail
205	10 Correspondence	Comments on the Exec Summary	2	9	94 Notes
206	10 Correspondence	NRC Report, review, comments	2	9	94 E-Mail
207	10 Correspondence	CEPPO Risk Mgmt Planning	2	7	94 Message
208	10 Correspondence	Chem Demil Cit Adv Comm Mtg	2	5	94 Fax/Agenda
209	10 Correspondence	Rev Com CSDP Air Filter Design	2	3	94 Memo
210	10 Correspondence	Permit Appl Review-3rd NOD	1	25	94 Letter
211	10 Correspondence	UAD Committee Follow-up	1	22	94 E-Mail
212	10 Correspondence	Umatilla Funding	1	21	94 E-Mail
213	10 Correspondence	UAD Citizens Advisory Comm	1	12	94 E-Mail
214	10 Correspondence	Chem Demil Cit Adv Comm/Roster	12	16	93 List
215	10 Correspondence	Notes from Umatilla Meeting	12	10	93 E-Mail
216	10 Correspondence	Overview of the COMDEP Model	12	9	93 Notes
217	10 Correspondence	Facility Proj Management Plan	12	1	93 Memo
218	10 Correspondence	RCRA & Air Permit Applications	11	10	93 Letter
219	10 Correspondence	Chem Demil Wrkgrp Conf Call	11	9	93 E-Mail
220	10 Correspondence	Advisory Committee	11	9	93 E-Mail
221	10 Correspondence	CSEPP Fact Sheet	10	25	93 Memo
222	10 Correspondence	1992 TSDF Billing	10	13	93 E-Mail
223	10 Correspondence	Umatilla Conference Call	10	6	93 E-Mail
224	10 Correspondence	Public Info. Materials Requested	9	30	93 Letter
225	10 Correspondence	Current Stockpiles Deteriorating	9	23	93 Letter
226	10 Correspondence	Current Stockpiles Deteriorating	9	23	93 Letter
227	10 Correspondence	Statute Trmtnt Strge Disposal	8	13	93 Letter
228	10 Correspondence	Dioxin Emission Limits	8	11	93 Memo
229	10 Correspondence	EPA in Surrogate Trial Burn	8	9	93 Letter
230	10 Correspondence	Cost Pricing Proposals	8	5	93 Letter
231	10 Correspondence	Original Cooperative Agreement	7	22	93 Letter
232	10 Correspondence	Destroy Stockpile of Obsolete Chemicals	7	7	93 Letter
233	10 Correspondence	UAD - Cit Adv Comm	6	30	93 Memo
234	10 Correspondence	Notice of Permit App Defcncy	6	29	93 Letter
235	10 Correspondence	UMCDF Second NODs	6	22	93 Memo
236	10 Correspondence	Concerned Citizen, Nerve Gas	6	17	93 Letter
237	10 Correspondence	Destroy Stockpile	6	10	93 Letter

Index of Administrative File  
Appendix 1

242	10 Correspondence	Chronology of the Project	6	4	93 Letter
243	10 Correspondence	Chem Weap Demil&Dis:GB&VX Camp	5	12	93 Overview
244	10 Correspondence	Request for Info.on Demil	5	5	93 Letter
245	10 Correspondence	NOD	4	21	93 Letter
246	10 Correspondence	Umatilla NOD Transmittal	4	11	93 Fax/Memo
247	10 Correspondence	Incinerator Project Status	3	29	93 Report
248	10 Correspondence	RCRA Deact Furnce Waste Drums	3	5	93 Mmo/Fax
249	10 Correspondence	Governor Authorization of CAC	2	22	93 Memo
250	10 Correspondence	Chronology of Project	1	22	93 Letter
251	10 Correspondence	List of Hazardous Substances	1	13	93 Letter
252	10 Correspondence	CSEPP	1	13	93 Letter
253	10 Correspondence	OVT at the JACADS	1	13	93 Memo
255	10 Correspondence	Project Status & Issue Report	1	3	93 Report
256	10 Correspondence	Finding Funds 4 Tribe Involvmnt	11	30	92 E-Mail
257	10 Correspondence	Met Station	11	20	92 E-Mail
258	10 Correspondence	Open Burning/Open Detonatn Pit	11	20	92 E-Mail
446	10 Correspondence	Chem Stockpl Disp Sys	11	4	92 Review
259	10 Correspondence	Sumbittal of Clsre Pln, Phone	10	2	92 Summary
1031	10 Correspondence	RCRA Trial Burn for Liquid Incin.	10	1	92 Letter
260	10 Correspondence	NOD	9	10	92 Letter
261	10 Correspondence	Fee Adjustment	8	25	92 Letter
262	10 Correspondence	Review & Comments Review	8	22	92 Letter
263	10 Correspondence	Wipe Testing for Furnace	7	21	92 Chart
264	10 Correspondence	Clean-up/Closure	7	20	92 E-Mail
265	10 Correspondence	June 1992 RCRA Closure Plan	7	7	92 Memo
266	10 Correspondence	Cleanup of Popping Furnace	7	7	92 E-Mail
267	10 Correspondence	Revised Schedule for Clsre Doc.	5	8	92 Letter
268	10 Correspondence	Meteorological Monitoring Station Setting	4	1	92 Report
269	10 Correspondence	Public Meeting	3	18	92 E-Mail
270	10 Correspondence	Postpone Clsre Pln, Phone Use	3	3	92 Summary
271	10 Correspondence	Correction of Address	2	11	92 Letter
272	10 Correspondence	IRZAPAZ Population	2	6	92 Memo
273	10 Correspondence	Nerve Agent Incin. Questions	1	30	92 Letter
274	10 Correspondence	Incineration Project	1	21	92 E-Mail
275	10 Correspondence	Dept. Position on Cndctng brn	1	10	92 Letter
276	10 Correspondence	Agencies Final Comments on Part B Permit	1	2	92 Memo
277	10 Correspondence	Comments on Draft NOD	12	5	91 Memo
278	10 Correspondence	Changing Furnace Burnout Proc	11	22	91 Letter
279	10 Correspondence	Burnout Rationale	11	13	91 Fax/Letter
280	10 Correspondence	Air Contaminant Dschrg Prmt	10	22	91 Letter
281	10 Correspondence	Amendment to Closure Plan	10	22	91 Letter
282	10 Correspondence	Burnout & Removal of Furnace	9	30	91 Memo
283	10 Correspondence	EMSL TA for XRF	8	5	91 Letter
284	10 Correspondence	Land Use Compatibility Statmnt	7	31	91 Trnsmttl
285	10 Correspondence	Ancillary Support Projects	6	5	91 Letter
286	10 Correspondence	Ancillary Support Construction	5	27	91 Letter

Index of Administrative File  
Appendix 1

287	10 Correspondence	Air Contaminant Discharge	5	23	91 Letter
288	10 Correspondence	JACADS Trl Brn POHCs Dcn Soltm	5	9	91 Memo
289	10 Correspondence	Air Containment, Air Pollutn	5	6	91 Letter
290	10 Correspondence	NON, installation of Tank	4	16	91 Letter
292	10 Correspondence	JACADS Liquid Injection	3	4	91 Memo
293	10 Correspondence	Part B HW, Offer of Installtn	2	21	91 Letter
294	10 Correspondence	Signatories on RCRA Permit	1	28	91 Letter
295	10 Correspondence	Libility Fed Gov Question	12	13	90 Memo
296	10 Correspondence	Fed gov Lblty, Umatilla	12	4	90 Letter
297	10 Correspondence	Umatilla Depot Incinerator	11	19	90 Memo
298	10 Correspondence	Part B Application Change	11	5	90 Letter
299	10 Correspondence	Umtla Dpt Incin., Pblic Prtctn	10	29	90 Letter
300	10 Correspondence	Changes to RCRA Part B Permit	10	17	90 Letter
301	10 Correspondence	RCRA Prmt App CSDP	10	9	90 Letter
302	10 Correspondence	Permit App UMDA	10	5	90 Letter
303	10 Correspondence	Sampling Plan UAD Closure Plan	9	26	90 Summary
304	10 Correspondence	Approval of UAD Closure Plan	9	18	90 Summary
305	10 Correspondence	RCRA Permit Appl Enclosed	8	27	90 Letter
306	10 Correspondence	Visit to JACADS	8	23	90 Transmittl
307	10 Correspondence	Request of OR Emerg. Mngmt	8	21	90 E-Mail
308	10 Correspondence	Amendment to Closure Plan	7	26	90 Letter
309	10 Correspondence	Revisions to Closure Plan	7	26	90 Letter
310	10 Correspondence	Addendum to UMDA Furnace Clsre	6	29	90 Letter
311	10 Correspondence	RCRA/\$fund Overlap	6	27	90 Memo
312	10 Correspondence	Issues to be Solved in Closure	6	11	90 Letter
313	10 Correspondence	US - Soviet Weapons Reduction	6	6	90 Memo
314	10 Correspondence	Popping Furnace Closure Schdl	5	22	90 Memo
315	10 Correspondence	Followup Info. from Phone Conversation	5	15	90 Letter
316	10 Correspondence	4/10/90 National ICCB Meeting	5	9	90 Transmittal
317	10 Correspondence	Conference call Chem Warfare Agent	4	20	90 Memo
318	10 Correspondence	UAD Popping Furnace ClosurePin	4	18	90 Letter
319	10 Correspondence	Revised CSDP Schedules	4	17	90 Memo
320	10 Correspondence	National ICCB Meeting	4	10	90 Memo
321	10 Correspondence	ICCB Meeting attendance	3	28	90 Transmittal
322	10 Correspondence	JACADS RCRA Permit	3	15	90 Memo
323	10 Correspondence	Revised Closure Plan for Deactvtn Furnance	3	9	90 Letter
324	10 Correspondence	Tank Integrity Assessment	3	6	90 Letter
397	10 Correspondence	DEQ included in Committee	3	6	90 Letter
325	10 Correspondence	RCRA Permit Document Request	2	12	90 Letter
326	10 Correspondence	RCRA Part B App. changes Requested	2	9	90 Letter
327	10 Correspondence	Phone Use Rpt, Info Closure Plan	1	17	90 Summary
328	10 Correspondence	Compliance Order HW-ER-89-67	1	5	90 Letter
329	10 Correspondence	Small-arms Firing Range	12	18	89 Letter
330	10 Correspondence	Deactivation Furnace Closure	12	1	89 Letter
331	10 Correspondence	UST Leak Testing Certification	11	17	89 Letter
332	10 Correspondence	Telephone/Fax #'s for POCs	11	14	89 Memo/Fax

Index of Administrative File  
Appendix 1

333	10 Correspondence	Certifications & Tank Integrity	11	3	89	Letter
334	10 Correspondence	Deny RCRA Permit	11	1	89	Letter
336	10 Correspondence	Notice of Final Determination	11	1	89	Agremnt
337	10 Correspondence	Tooele Pmt Word Disks	10	19	89	Memo
338	10 Correspondence	Permits/AQ, HW & RCRA Part B	10	4	89	Memo
339	10 Correspondence	Deadline Extension-Thank You	9	28	89	Letter
340	10 Correspondence	Interagency Agremnt for UAD	9	19	89	Memo
341	10 Correspondence	Interagency Agreement	9	19	89	Letter
342	10 Correspondence	Deadline Extension-Granted	9	14	89	Letter
343	10 Correspondence	Approval of Schedule for Tank	9	8	89	Letter
344	10 Correspondence	Proposed RCRA Permit Denial	8	30	89	Letter
346	10 Correspondence	Deactivation Furnace	7	7	89	Fax
347	10 Correspondence	APE 1236 Deactivation Furnace	5	25	89	Letter
348	10 Correspondence	Umatilla IAG	5	25	89	Letter
349	10 Correspondence	Remdl Invest. of Explsv Wshout	5	11	89	Letter
350	10 Correspondence	Add'l Requirements for Incin.	4	21	89	Letter
351	10 Correspondence	Nrve Agnt Incin. HW Facility	4	17	89	Intrmemo
352	10 Correspondence	Mailing List for HW Incin Prmts	3	15	89	Letter
353	10 Correspondence	Incenerator Project	3	8	89	Letter
354	10 Correspondence	RCRA Part B Completion	3	8	89	Letter
355	10 Correspondence	Conference Call on 03-06-89	2	28	89	Memo
356	10 Correspondence	Incin. Final Operating Permits	2	27	89	Letter
357	10 Correspondence	Notice of Deficiency Warning	2	12	89	Report
358	10 Correspondence	Cooperating Agencies Meeting	2	10	89	Letter
359	10 Correspondence	Review of DOD's Instruction	2	2	89	Letter
360	10 Correspondence	Public Scoping Meeting	2	2	89	Letter
361	10 Correspondence	RCRA Part B - OB/OD UMMA	1	23	89	Memo
362	10 Correspondence	USTs at Umatilla	1	17	89	E-Mail
363	10 Correspondence	OB/OD Completeness	1	9	89	Letter
364	10 Correspondence	OB/OD Completeness Check, Phone	1	6	89	Summary
365	10 Correspondence	Permitting Info. & Nonprmtting	1	3	89	Memo
366	10 Correspondence	Tooele Part B Review Sprrt Doc	12	29	88	Memo
367	10 Correspondence	Completeness Review (Part B)	12	29	88	Letter
368	10 Correspondence	Popping Furnace Deadline Appl	12	20	88	Memo
369	10 Correspondence	Revw of RCRA Permit App.	12	20	88	Memo
370	10 Correspondence	Popping Furnace & OB/OD Act	12	2	88	Letter
371	10 Correspondence	CSDR Team EPA/State Review	11	28	88	Notes
372	10 Correspondence	CSDP Tentative RCRA review	11	3	88	Schedule
373	10 Correspondence	Incomplete Applications	9	30	88	Letter
375	10 Correspondence	Proposed Nerve Agent Inc Wkgrp	9	16	88	Letter
376	10 Correspondence	Proposed Nerve Agent Inc Wkgrp	9	16	88	Letter
377	10 Correspondence	Funding Request-Director's Ltr	9	15	88	Memo
378	10 Correspondence	Thank You Letter to Fhanson	8	26	88	Letter
379	10 Correspondence	Deactivation Furnace Upgrade	8	24	88	Fax
380	10 Correspondence	OAR for Aquatic Toxicity Test	8	19	88	Letter
381	10 Correspondence	Appoint two Representatives	8	18	88	Letter

Index of Administrative File  
Appendix 1

382	10	Correspondence	Local Intergov't Consultation Board	8	12	88	Memoltr
383	10	Correspondence	Inspection Visit	7	6	88	Memo
384	10	Correspondence	Full-Time Person Needed	6	30	88	Letter
385	10	Correspondence	Disposal of Nerve Agents	6	30	88	Letter
386	10	Correspondence	Final Minutes to 2-18-88 mtg	6	17	88	Memo
387	10	Correspondence	Installation Restoration Program Plan	6	10	88	Letter
388	10	Correspondence	Invite to Inspection	5	16	88	Memo
389	10	Correspondence	Conference Call and Info.	5	9	88	Memo
390	10	Correspondence	Permitting of Popping Furnace	4	11	88	Memo
391	10	Correspondence	Review Comments from -	3	24	88	Letter
393	10	Correspondence	Army ROD & Permit Schedules	3	2	88	Memo
394	10	Correspondence	Emergency Response Concept Plan	2	24	88	Letter
395	10	Correspondence	Disposal of Chemical Munitions	2	17	88	Letter
396	10	Correspondence	EPA Review of CDC Proposal	2	1	88	Letter
398	10	Correspondence	Nonrequirement of Permit	12	30	87	Letter
400	10	Correspondence	Incinerability of Impurities	12	16	87	Memo
401	10	Correspondence	Emissions Test Report for CAMDs	12	14	87	Report
402	10	Correspondence	Pasadena, CA CAD Workgroup Mtg	11	12	87	Notes
404	10	Correspondence	Protecting Public Health	11	6	87	Notes
405	10	Correspondence	Demil of Nerve Agent Concerns	10	28	87	Memo
406	10	Correspondence	Meeting w/Army, 11/12-13/87	10	16	87	Memo
407	10	Correspondence	Materials on Perceived Rsk	10	8	87	Letter
408	10	Correspondence	Tooele Report & NOD Comparison	10	6	87	Letter
409	10	Correspondence	Released Reports on Incidents CAMD	10	5	87	Memo
410	10	Correspondence	Interim Safety Report	10	2	87	Letter
411	10	Correspondence	Mailing List Addition	9	23	87	Letter
412	10	Correspondence	Nerve Agent Incidents Reports	9	22	87	Memo
413	10	Correspondence	Protecting Public Health	9	16	87	Notes
414	10	Correspondence	Chem Incid. JACADs, CAMDs Toole	9	10	87	Memo
415	10	Correspondence	Final RCRA Fac. Investigation	7	27	87	Report
416	10	Correspondence	Emission & Exposure Levels	7	23	87	Memo
417	10	Correspondence	Schedule for Mtg. Aug. 5	7	21	87	Letter
418	10	Correspondence	Nerve Gas Demilitarization Note	7	8	87	Notes
419	10	Correspondence	Mailing List	6	30	87	Memo
420	10	Correspondence	Barry J Davis, Hearing	6	4	87	Tstmy
421	10	Correspondence	UAD Events Schedule Nrv Incin	6	0	87	Schdle
422	10	Correspondence	Workgroup for EIS	5	13	87	Letter
423	10	Correspondence	SWMU Investigation Meeting Sum	5	11	87	Transmittal
424	10	Correspondence	Igloo Monitoring	5	8	87	Letter
425	10	Correspondence	Procossing Fee HW Incin App	4	24	87	TransAdv
426	10	Correspondence	Incinerator Prmt Act Schedule	4	15	87	Memo
427	10	Correspondence	CDC Mtg, Safe Expsre Levels	4	9	87	Letter
428	10	Correspondence	Health Aspects of Emerg. Rspnse	4	8	87	Letter
429	10	Correspondence	Register Community Position	4	7	87	Letter
430	10	Correspondence	Response to House of Rep Lttr	3	31	87	Letter
431	10	Correspondence	Invstgtn Prpsl Unacctbl	3	23	87	Letter

Index of Administrative File  
Appendix 1

432	10 Correspondence	Chem. Weapons disposal, mtg	3	23	87 Letter
433	10 Correspondence	Wkgrp Cnfrnce Call, Trail Burn	3	23	87 Letter
434	10 Correspondence	Participation in Pblc Hearing	3	18	87 Letter
435	10 Correspondence	Add'l Info to Hearing	3	16	87 Letter
436	10 Correspondence	3/25-27 Mtg. RCRA Pmnts Demil	3	10	87 Memo
437	10 Correspondence	Confidentlty Claim Convsntn	3	6	87 Letter
438	10 Correspondence	Analysis of Database	3	6	87 Memos
439	10 Correspondence	Investigation Report Chem Incident	3	4	87 Report
440	10 Correspondence	Disposal of Lethal Chem Agents	2	4	87 Letter
441	10 Correspondence	Briefing Concerning GB Release	2	4	87 Memo
442	10 Correspondence	DOD Draft Instruction Comments	1	14	87 Memo
443	10 Correspondence	Response to October 2, 1986	1	12	87 Letter
444	10 Correspondence	Review of Attachment D-2	1	5	87 Memo
445	10 Correspondence	NOD Toeole South CSD	1	5	87 Letter
449	10 Correspondence	Groundwater Monitoring	12	11	86 Letter
450	10 Correspondence	Revised "Model" NOD	12	10	86 Memo
451	10 Correspondence	CDC Exposure Limit/draft	12	8	86 Letter
452	10 Correspondence	Notes from Phone Conversation	12	2	86 Notes
453	10 Correspondence	HW Print Fee	11	17	86 Memo
454	10 Correspondence	Conf Call on NOD for Demil Inc	11	14	86 Memo
455	10 Correspondence	"Model" NOD	11	7	86 Memo
456	10 Correspondence	Fed. Facilities Compliance	9	23	86 Letter
457	10 Correspondence	Draft Programtc Env. Impct	9	23	86 Letter
458	10 Correspondence	RCRA Part B Permit	9	18	86 Letter
459	10 Correspondence	Secrecy Agreement	8	29	86 Agreeemnt
460	10 Correspondence	HW Inventory of Sites	8	5	86 Letter
461	10 Correspondence	Federal Fac Compliance Issues	7	9	86 Memo
462	10 Correspondence	Proposed Chem Agent Inc Meeting	6	12	86 Letter
463	10 Correspondence	Formation of Prmt Wrtr Wkgrp	6	6	86 Memo
465	10 Correspondence	Storage/Trtmnt/Disp - GB, VX, HD	4	18	86 Memo
466	10 Correspondence	Mandating Disposal Stockpile	3	28	86 Letter
467	10 Correspondence	Army Concept Plan Briefing	3	24	86 Letter
468	10 Correspondence	"Environmental Significance"	11	13	85 Memo
469	10 Correspondence	NOV Response	10	29	85 Letter
470	10 Correspondence	DOD RCRA Incineration Issues	10	25	85 Memo
471	10 Correspondence	Requirements for Inspectors	10	17	85 Letter
472	10 Correspondence	What to do w/HW at the Depot	10	17	85 Memo
473	10 Correspondence	Quarterly Rprt of HW Storage	10	17	85 Memo
474	10 Correspondence	Information Sheet	10	10	85 Letter
475	10 Correspondence	Response to NOV	9	23	85 Letter
476	10 Correspondence	Request Furnsh Delvry Status	8	15	85 Letter
477	10 Correspondence	Attachment 2, Part B Checklist	7	22	85 Checklist
478	10 Correspondence	Signatories to DOD Prmt Appl	7	3	85 Letter
479	10 Correspondence	Consent Agreement & Final Order	6	24	85 Letter
480	10 Correspondence	Consent Agreement & Fnl Order	6	10	85 Letter
481	10 Correspondence	Prog Implementation Gudnc Syst	2	11	85 Memo

Index of Administrative File  
Appendix 1

482	10	Correspondence	M55 Chemical Rockets Storage	2	4	85	Letter
483	10	Correspondence	Notes of RCRA Methods & QA Act	2	1	85	Memo
484	10	Correspondence	Last 6 mo Summary on GB & VX	12	14	84	Letter
485	10	Correspondence	Disposal of M55 Rockets	6	18	84	Letter
486	10	Correspondence	Proposed Annual License Fee	3	11	83	Letter
487	10	Correspondence	Rescinding Permit Action	4	10	81	Letter
488	10	Correspondence	Proposed Meteorological Data	0	0	0	Fax
489	10	Correspondence	Nerve Agnt Incin. Proj. Status	0	0	0	Report
1655	12	Other State Docs	Public request for comments from ADEM	11	8	96	PubNotice
1654	12	Other State Docs	ADEM Completeness letter	11	7	96	Letter
1425	12	Other State Docs	TOCDF Compliance	11	1	96	Letter
1423	12	Other State Docs	Requesting written opinion of TOCDF compliance	10	17	96	Letter
1422	12	Other State Docs	JACADS-GB Crystalization	9	27	96	Letter
1421	12	Other State Docs	JACADS-GB Crystalization	9	9	96	Letter
1420	12	Other State Docs	JACADS-GB Crystalization	9	6	96	Letter
1803	12	Other State Docs	EPA HQ Rev. of Armys proposal of HCL acute Tox.	9	4	96	Letter
1852	12	Other State Docs	JACADS Class 2 Permit Mod Approval	5	28	96	Letter
1534	12	Other State Docs	JACADS HVC Filter Change-Out Tests	5	23	96	Letter
1535	12	Other State Docs	Waste Analysis Plan/Notice of Deficiency	5	15	96	Letter
1475	12	Other State Docs	MPF Surrogate Trial Burn	4	18	96	Memo
1533	12	Other State Docs	Notice of Violation - TOCDF	4	15	96	Letter
1942	12	Other State Docs	JACADS request for additional information	9	6	95	Letter
1802	12	Other State Docs	Pollution Abatement Filter System (PFS) Mod Re	7	20	95	Letter
1383	12	Other State Docs	JACADS - Determination of Violation	3	13	95	Report
1941	12	Other State Docs	JACADS GB Release Notification to EPA R7	4	4	94	Letter
1981	15	CTUIR	Responses to CTUIR comments on Final EIS	11	8	96	Report
1977	15	CTUIR	AQ dispersion and deposition review and eval	11	5	96	Report
1978	15	CTUIR	Eval of combustion by-products Task 6	11	5	96	Report
1979	15	CTUIR	Eval of Monitoring Locations Task 8.2 & 9	11	5	96	Report
1980	15	CTUIR	Interim final eval of chem fate to transport	11	5	96	Report
1229	15	CTUIR	MOA between Army and CTUIR	10	17	96	MOA
1804	15	CTUIR	CTUIR's EIS Comments	7	24	96	Letter
1594	15	CTUIR	Response to 6/7/96 letter to LMarsh	6	24	96	Letter
1593	15	CTUIR	Support for Sen. Ford Amendment to Defense	6	18	96	Letter
1592	15	CTUIR	Extension of public comment period...	6	7	96	Letter
1629	15	CTUIR	Response to 4/26/96 letter	5	26	96	Letter
1536	15	CTUIR	EPA/Tribes Scope of work	4	26	96	Outline
1567	15	CTUIR	CTUIR/SSRP Follow-up on DEQ Briefing to EQC	4	26	96	Letter
1853	15	CTUIR	Transmittal of draft permit diskettes	4	15	96	Memo
1854	15	CTUIR	Unable to attend EQC Briefing on 4/12/96	4	12	96	Letter
1478	15	CTUIR	Response to moratorium request	4	1	96	Letter
1388	15	CTUIR	Response to Feb 15, 1996 letter from DSampson	3	19	96	Letter
1387	15	CTUIR	CTUIR/SSRP Rev. Draft EIS Comments	3	14	96	Letter
1236	15	CTUIR	Comment on CTUIR Feb 15, 96 Letter	2	23	96	Letter
11237	15	CTUIR	Objection to Umatilla Indians' Petition	2	23	96	Letter
1235	15	CTUIR	Comments by the Tribes - Incinerator	2	21	96	Letter

Index of Administrative File  
Appendix 1

1234	15	CTUIR	Mayors Response to Moratorium Request	2	16	96	Letter
1161	15	CTUIR	Request for Assistance in Estab. Moratorium	2	15	96	Letter
1162	15	CTUIR	Proposal for Coord effort to rectify Defic.	2	15	96	Letter
1163	15	CTUIR	Statement of Armand Minthorn	2	15	96	Statement
1164	15	CTUIR	News Release	2	15	96	NewsRelease
1165	15	CTUIR	Statement of Donald Sampson	2	15	96	Statement
1386	15	CTUIR	News Release Material From CTUIR	2	15	96	NewsRls
1066	15	CTUIR	Response to 1-19-96 letter	2	6	96	Letter
1477	15	CTUIR	Quarterly Leaker Reports For UAD	1	23	96	Letter
1054	15	CTUIR	Follow up to 1-11-96 EQC re Issues	1	19	96	Letter
1476	15	CTUIR	CTUIR/SSRP Comments on EPA Military Munitions	1	8	96	Letter
1055	15	CTUIR	Invitation to meet	1	3	96	Letter
1056	15	CTUIR	Corrective action authorization	12	8	95	Letter
490	15	CTUIR	Final Rule HW Prog. Revision	11	28	95	FederlReg
491	15	CTUIR	Working Relationship w/ CTUIR	11	14	95	Letter
1037	15	CTUIR	Columbia Basin Salmon Policy	11	9	95	Policy
492	15	CTUIR	HW Management Program Revisions	11	8	95	Letter
1385	15	CTUIR	Minutes from meeting with CTUIR	11	1	95	Letter
493	15	CTUIR	Explain Chem Weapons Incin.	10	26	95	Article
494	15	CTUIR	Nerve & Blister Agents	10	17	95	Memo
1384	15	CTUIR	Triabal Advisory Committee Outreach	9	29	95	Letter
1205	15	CTUIR	Comments on Draft Pre-trial Burn Work Plan	8	22	95	Letter
495	15	CTUIR	Demil Risk Assessment	8	21	95	Letter
496	15	CTUIR	Info. Request at 5/30/95 Meeting; Followup	8	14	95	Memo
497	15	CTUIR	Risk Asses. Prpsd Incnrtm Cmplx	5	12	95	Letter
1160	15	CTUIR	Proposed Agenda Items for May 30, 1995 Mtg	5	12	95	Letter
1159	15	CTUIR	Response to Draft Risk Assessment Work Plan	4	24	95	Letter
498	15	CTUIR	CTUIR Paper on Risk Asses.	3	30	95	Report
1158	15	CTUIR	Columbia Basin Salmon Policy	3	8	95	Report
1233	15	CTUIR	Umatilla Tribes contact	12	28	92	Email
1232	15	CTUIR	Comments on CRCS and DEIS	11	9	92	Letter
499	15	CTUIR	Prmnt Rules to Spill Rules	4	0	87	Memo
1231	15	CTUIR	Treaty w/Walla Walla, Cayuse, and Umatilla Tribe	0	0	0	Report
1479	20	State Permits	ANCDF Draft Permits	11	3	95	Letter
500	20	State Permits	CSDP	7	18	95	Air Prmt
1672	20	State Permits	Major Issues for review of ANAD Subpart B	3	20	95	Report
501	20	State Permits	ANCDF RCRA Application Sec D-9	6	1	94	ApplSec
502	20	State Permits	Tooele Depot S. Final Permit	7	18	89	Memo
508	20	State Permits	Tooele Permit/final 7/89	7	1	89	Permit
509	20	State Permits	Tooele Permit/draft 4/89	4	7	89	Permit
503	20	State Permits	Demil Interim Draft Permit	3	2	89	Memo
511	20	State Permits	Tooele Permit/attachments 1-3	2	17	89	Attach
512	20	State Permits	Tooele Permit/attachments 4-8	2	17	89	Attach
513	20	State Permits	Tooele Permit/attachment 9	2	17	89	Attach
514	20	State Permits	Tooele Permit/attachments 9-10	2	17	89	Attach
515	20	State Permits	Tooele Permit/attachments 11-13	2	17	89	Attach

Item B 000135



Index of Administrative File  
Appendix 1

504	20	State Permits	Tooele Army Depot/draft	2	14	89	Permit
510	20	State Permits	Tooele Permit 8/89	2	0	89	Permit
	20	State Permits	RCRA & HW Permit Application	9	1	88	Applictn
505	20	State Permits	JACADS Permit Modification	5	27	88	Permit
506	20	State Permits	Major Operating Condtns Deactvtn Furnance	0	0	0	Table
507	20	State Permits	JACADS Permit	0	0	0	Permit
516	20	State Permits	Tooele Permit/attachments14-21	0	0	0	Attach
1987	21	Other State NODs	Pine Bluff Arsenal response to NODs	8	12	96	NODs
1855	21	Other State NODs	PBCDF NOD for Part B Application	6	7	96	Letter
1480	21	Other State NODs	Fourth NOD Comments ANCDF RCRA/Air App.	3	7	96	Letter
1505	21	Other State NODs	ANCDF Draft RCRA Change Pages	6	19	95	Report
517	21	Other State NODs	Attached FYI, Fnl Sub X Comments, Notes, etc	10	12	94	Rvw Cmntnts
518	21	Other State NODs	Preliminary Design Review	11	18	88	Report
519	21	Other State NODs	Documents w/second NODs	11	18	87	Memo w/L
520	21	Other State NODs	Anniston Army Depot	11	3	87	Letter
2329	21	Other State NODs	NOD for Tooele CSDF, Summary of Responses	10	15	87	Report
521	21	Other State NODs	CSDS Onsite Alternative	10	15	87	Letter
522	21	Other State NODs	Tooele NOD Summary of Response	8	27	87	Report
523	21	Other State NODs	Matrix of NODs Lxngtn,Nwprt,Tle	3	18	87	Memo
524	21	Other State NODs	DOD Chem. Agent Munitions Pzmt	1	21	87	Letter
525	21	Other State NODs	Utah NOD Comments for Dept Army	11	15	86	Report
1829	30	Army Reports	Exec.Summary-Alternative Technology Eval. Rpt	9	9	96	Report
1830	30	Army Reports	UMCDF Phase 1 Quantitative Risk Assess.	9	0	96	Report
1983	30	Army Reports	Probabilistic seismic hazard assessment UMCDF	9	0	96	Report
1828	30	Army Reports	Tooele HVAC Agent Leak Report	8	28	96	Report
1982	30	Army Reports	Seismic Fragilities of Structures & Equip.	8	0	96	Report
1856	30	Army Reports	Interim Status Assessment for Chem Demil	4	15	96	Report
1827	30	Army Reports	Draft-UMCDF Phase 1 Quantitative Risk Assess.	4	0	96	Report
1510	30	Army Reports	JACADS RCRA Wkly Feed/Incident Rpt 1/21-27/96	2	14	96	Report
1833	30	Army Reports	Surrogate Trial Burn Report for LIC1	11	29	95	Report
1834	30	Army Reports	Surrogate Trial Burn Report for LIC1-Appendx A-	11	27	95	Report
1835	30	Army Reports	Surrogate Trial Burn Report for LIC1-Appendx I-	11	27	95	Report
1390	30	Army Reports	Ton Container Survey Analysis of HD @ APG	10	0	95	Report
528	30	Army Reports	Off-Site Meteorolgccl Data Set	4	3	95	Report
1409	30	Army Reports	RCRA trial burn reports-JACADS-Agent GB	3	0	95	Report
726	30	Army Reports	M55 Rocket Storage Life Eval	1	23	95	Report
530	30	Army Reports	M55 Rocket Storage Life Eval	12	0	94	Report
1268	30	Army Reports	Rpt of 11-19-94 ECR "B" Incident	12	0	94	Report
1166	30	Army Reports	Estimated Control Limits... - Final Draft	11	0	94	Report
1167	30	Army Reports	Appendix H: UAD Activity Site Report	11	0	94	Report
727	30	Army Reports	Health Risk Assessment	9	12	94	Report
531	30	Army Reports	60% Cntmntd Soil Ammntn Dmltn	9	0	94	Report
532	30	Army Reports	60% Cntmntd Soil Ammntn Dmltn	9	0	94	Report
533	30	Army Reports	Meteorological Monitoring Plan	7	15	94	Report
534	30	Army Reports	Summary Cryofracture Process	5	1	94	Report
1428	30	Army Reports	Alternative Demil Tech Report	4	11	94	Report

Index of Administrative File  
Appendix 1

1427	30 Army Reports	Alternative Demil Tech Report - Executive Summ	4	11	94	Report
529	30 Army Reports	1993 Annual Report of RCRA NON	3	5	94	Report
1267	30 Army Reports	Liquid Incinerator Slag Mngmnt System Report	1	21	94	Report
535	30 Army Reports	Future Uses of the CAMDS:	12	1	93	Report
1265	30 Army Reports	Site Monitoring Concept Study	9	15	93	Report
536	30 Army Reports	Ass of Carbon Fltr System Perf	9	1	93	Report
1266	30 Army Reports	Assessment of Carbon Filter System Performance	9	0	93	Report
537	30 Army Reports	Data Ass Carbon Fltr Sys Perf	8	1	93	Report
1263	30 Army Reports	Health Risk Assessment No. 42-21-MIX6-93	7	8	93	Report
538	30 Army Reports	Physical & Chemical Integrity	7	1	93	Report
539	30 Army Reports	Eval HD Projectile:JACADS OVT	5	1	93	Report
1826	30 Army Reports	Summary Evaluation-JACADS Ops Verification Tes	5	0	93	Report
541	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
542	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
543	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
544	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
545	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
546	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
547	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
548	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
549	30 Army Reports	Brn w/ HD Feed Liqd Incin	4	6	93	Report
1262	30 Army Reports	Health Risk Assessment No. 42-21-MIBE-93	4	6	93	Report
540	30 Army Reports	Eval HD Ton Cntnr:JACADS OVT	4	0	93	Report
	30 Army Reports	Health Risk Assess. Inhalation, Combustion	4	0	93	
550	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
551	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
552	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
553	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
554	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
555	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
556	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
557	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
558	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
559	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
560	30 Army Reports	Demo Burn Metal Parts Furnance w/ HD	3	1	93	Report
561	30 Army Reports	Results Trl Brn Metal Parts Furnance w/ HD	3	1	93	Report
562	30 Army Reports	Extraction Labs Ntbk/Bench Nt	3	1	93	Report
563	30 Army Reports	Trl Burn Rprt HD-MPF JACADS	3	1	93	Report
1389	30 Army Reports	Dmstratn Tst Brn Thrml Dstrctn	2	0	93	Report
564	30 Army Reports	RCRA Trial Burn Report for JACADS - HD	12	16	92	Report
565	30 Army Reports	Evaluation of VX Rocket Test:	11	0	92	Report
566	30 Army Reports	Trl Brn w/ VX Feed Liqd Incin JACADS	10	6	92	Report
567	30 Army Reports	Trl Brn w/ VX Feed Liqd Incin JACADS	10	6	92	Report
568	30 Army Reports	Trl Brn w/ VX Feed Liqd Incin JACADS	10	6	92	Report
569	30 Army Reports	Trl Brn w/ VX Feed Liqd Incin JACADS	10	6	92	Report
570	30 Army Reports	Trl Brn w/ VX Feed Liqd Incin JACADS	10	6	92	Report

Item B 000137

Index of Administrative File  
Appendix 1

571	30	Army Reports	Trl Brn w/ VX Feed Liq Incin JACADS	10	6	92	Report
572	30	Army Reports	Trl Brn w/ VX Feed Liq Incin JACADS	10	6	92	Report
573	30	Army Reports	Trl Brn w/ VX Feed Liq Incin JACADS	10	6	92	Report
574	30	Army Reports	Trl Brn w/ VX Feed Liq Incin JACADS	10	6	92	Report
575	30	Army Reports	Trl Brn w/ VX Feed Liq Incin JACADS	10	6	92	Report
576	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
577	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
578	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
579	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
580	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
581	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
582	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
583	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
584	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
585	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
586	30	Army Reports	Trl Brn & TSCA Demo DFS w/ M55 VX Rckts	10	6	92	Report
1261	30	Army Reports	Disposal of Chemical Agents & Munitions	10	0	91	Report
587	30	Army Reports	Draft DOD on Env Response Closing Miltry Bse	9	23	91	Rpt/Memo
	30	Army Reports	Health Risk Asses. Inhalation Risk, Incin.	9	0	91	
588	30	Army Reports	Evaluation /GB Rocket Campaign	7	25	91	Rpt/Memo
589	30	Army Reports	Trl Burn Rslt-JACADS-LIC,GB	6	17	91	Report
590	30	Army Reports	Eval GB Rckt Cmpn:JACADS OVT	6	1	91	Report
591	30	Army Reports	Monitoring Concept Plan	4	5	91	Report
593	30	Army Reports	Rslt Trl Brn Liquid Incin	12	10	90	Report
592	30	Army Reports	Rslt Trl Brn Liquid Incin	12	5	90	Report
1260	30	Army Reports	Chemical Stockpile Disposal Program	10	0	90	Report
594	30	Army Reports	OVT Plan for the JACADS Vol.1	2	9	90	Report
595	30	Army Reports	OVT Plan for the JACADS Vol.2	2	9	90	Report
1259	30	Army Reports	Disposal of Chemical Agents & Munitions	2	0	90	Report
526	30	Army Reports	Requirement of Report of HW Managemnt Actvts	1	4	90	Letter
527	30	Army Reports	ST Demil During 1st Quarter FY90	1	2	90	Memo
596	30	Army Reports	OVT Directive for the JACADS	3	1	89	Report
597	30	Army Reports	CAMDS Filter Design Panel	4	0	88	Report
598	30	Army Reports	CSDP/Implementaion Plan	3	15	88	Report
599	30	Army Reports	Elmts Procss Dsgn Criteria CSDP	11	13	87	Report
600	30	Army Reports	Eval CAMDS DFS M55 Rckt Incin	10	1	87	Report
601	30	Army Reports	Eval CAMDS DFS M55 Rckt Incin	10	1	87	Report
602	30	Army Reports	Eval CAMDS DFS M55 Rckt Incin	10	1	87	Report
603	30	Army Reports	Poll. Abtmnt Sys Ass CAMDS LIC	8	1	87	Report
604	30	Army Reports	Rsk Analysis Continued Strge of Chem Muntns	8	0	87	Report
605	30	Army Reports	Rsk Analysis Onsite Dspsl of Chem Muntns	8	0	87	Report
606	30	Army Reports	Rsk Analysis Chem Muntns Regnl or Natl Sites	8	0	87	Report
607	30	Army Reports	CAMDS Follow-up Ass. Panel	7	24	87	Report
608	30	Army Reports	Air Pollution Control Syst Ass	6	1	87	Report
609	30	Army Reports	Technical Investigation Board	3	30	87	Report
610	30	Army Reports	CSDP Supplement	3	1	87	Report

Index of Administrative File  
Appendix 1

611	30 Army Reports	Tech. Ass. Determination Chem	1	1	87 Report
612	30 Army Reports	Nerve Agent Demil Project	10	28	86 Report
613	30 Army Reports	5X Thermal Task Report	9	3	86 Report
614	30 Army Reports	Chem Stockpile Displ Cncpt Pln	3	15	86 Report
615	30 Army Reports	Chem Stockpile Displ Cncpt Pln	3	15	86 Report
616	30 Army Reports	M55 Rocket Disposal Program Study	11	22	85 Report
617	30 Army Reports	Independent Evalua/Assessment	10	0	85 Report
618	30 Army Reports	Disposal of Chemical Munitions	12	0	84 Report
619	30 Army Reports	Thermal Decomp. of GB, VX & HD	9	28	84 Report
620	30 Army Reports	Military Explosives	9	20	84 Report
621	30 Army Reports	Effects of Subacute Exposures	6	0	83 Report
622	30 Army Reports	Air Monitoring System Tech Ass	4	1	83 Report
627	30 Army Reports	Final Demilitarization Plan	0	0	83 Report
623	30 Army Reports	Ana Decontaminated Packing -	12	7	81 Report
624	30 Army Reports	Revision of Lmts Human Expos.	12	0	79 Report
625	30 Army Reports	Prfrmce Evaluation Gas Filtrs	10	0	78 Report
626	30 Army Reports	Report for GB Challenge Testng	2	28	77 Report
628	30 Army Reports	Executive Summary	0	0	0 Summary
2321	31 EIS Reports	Revised Final EIS	11	0	96 Report
1668	31 EIS Reports	Disposal of Chem Agents & Munitions-Final EIS	5	0	96 Report
1673	31 EIS Reports	Comments on Draft EIS	1	10	96 Letter
629	31 EIS Reports	Disposal of Chem. Agents & Munitions Stored	12	0	95 Report
637	31 EIS Reports	Review of Monitoring Activities	6	13	94 Report
638	31 EIS Reports	Evltng JACADS Operational Verification Tstng	6	13	94 Report
1269	31 EIS Reports	Eval of the JACADS Operational Verification	0	0	94 Report
1270	31 EIS Reports	Review of Monitoring Activities	0	0	94 Report
1271	31 EIS Reports	Convention-Prohibition of Dev, Production etc	0	0	93 Report
1666	31 EIS Reports	Disposal of Chem Agents & Munitions-Prelim EIS	5	0	92 Report
630	31 EIS Reports	Proposed Burn of Chem Weapons	1	17	92 Letter
640	31 EIS Reports	Disposal Chemical Agents/draft	10	0	91 Report
	31 EIS Reports	Final EIS	8	1	91 Report
641	31 EIS Reports	Final/Base Realignment&Closure	8	0	91 Report
642	31 EIS Reports	JACADS/final 2nd Supplemental-	6	0	90 Report
643	31 EIS Reports	JACADS/final 2nd Supplemental-	6	0	90 Report
631	31 EIS Reports	EIS CSDP	1	11	89 Letter
644	31 EIS Reports	JACADS/final	12	0	88 Report
645	31 EIS Reports	Chemical Stockpile Dpspl/final	1	0	88 Report
646	31 EIS Reports	Chemical Stockpile Dpspl/final	1	0	88 Report
1168	31 EIS Reports	Chemical Stockpile Disposal/Final	1	0	88 Report
647	31 EIS Reports	Evaluation of Draft Programmatic EIS	9	30	87 Report
648	31 EIS Reports	JACADS/draft Supplemental EIS	8	17	87 Report
633	31 EIS Reports	CSDP Drft Programtc Env. Impct	9	19	86 Letter
634	31 EIS Reports	CSDP-DPEIS	8	27	86 Letter
635	31 EIS Reports	Disposal of Nerve Agents	8	12	86 Letter
650	31 EIS Reports	Notice for Public Hearing	7	30	86 Letter
649	31 EIS Reports	Chemical Stockpile Dpspl/draft	7	1	86 Report

Index of Administrative File  
Appendix 1

636	31	EIS Reports	Draft EIS for UAD	0	0	0	Spdltr
1986	32	Other Reports	Dioxin Report	10	29	96	Report
1984	32	Other Reports	Remarks from Dr. RMcGee before the CDCAC	10	7	96	Report
1985	32	Other Reports	Public Involvement and the ChemDisposal Prog	10	0	96	Report
1943	32	Other Reports	Notes from 8/22/96 EQC Meeting	8	27	96	Notes
1859	32	Other Reports	Tech.wrkshp of WTI Incinerator R.A. issues	5	0	96	Report
1570	32	Other Reports	The Incineration of HD Agent at JACADS	3	17	96	Report
1391	32	Other Reports	Revised Draft EIS Comments	3	14	96	Letter
1057	32	Other Reports	Chemical Weapons Stockpile Info Declassified	1	22	96	Report
1537	32	Other Reports	The Oregon Experiment: A Grassroots Approach	1	0	96	Report
1538	32	Other Reports	Evaluation of Army's Draft Assess Criteria...	1	0	96	Report
651	32	Other Reports	HW Incineration Study	5	12	95	Memo
1058	32	Other Reports	List of GAO Reports	5	5	95	Report
652	32	Other Reports	Trial Burn Plan 4 LIC1	4	24	95	Report
653	32	Other Reports	Test Results & Operations	1	12	95	Ltr/Memo
1858	32	Other Reports	Stability of the US Stockpile	12	0	94	Report
	32	Other Reports	Analytical Methods for Env Sampling	9	20	94	Book
1548	32	Other Reports	US Chem Weapons Destruction Program	9	0	94	Report
654	32	Other Reports	Community Assessment Survey	8	0	94	Report
	32	Other Reports	Review of Monitoring Activities	6	13	94	Report
	32	Other Reports	Evaluation of JACADS OVT Part2	6	13	94	Report
	32	Other Reports	Review of Monitoring Activities	6	13	94	Report
	32	Other Reports	Evaluation of JACADS OVT Part2	6	13	94	Report
655	32	Other Reports	Installation Restoration Prgm	4	12	94	Report
656	32	Other Reports	Columbia Rvr Pathway Dosimetry	4	0	94	Report
657	32	Other Reports	Atmosphrc Pathway Dosimetry	4	0	94	Report
2330	32	Other Reports	Recommendations for Disposal	3	17	94	Report
658	32	Other Reports	Validation of HEDR Models	1	0	94	Report
659	32	Other Reports	Radionclide Relse To Atmosph.	1	0	94	Report
660	32	Other Reports	Radionclide Concentratns Columbia R. Frm Hanfrd	1	0	94	Report
661	32	Other Reports	Commercl Milk Distrbntn	12	0	93	Report
662	32	Other Reports	Comprehnsve Pln Exctve Summry	10	0	93	Report
663	32	Other Reports	Comprehensive Plan Summary	10	0	93	Report
664	32	Other Reports	Technical Report	10	0	93	Report
665	32	Other Reports	Alternative Technologies	8	2	93	Report
1569	32	Other Reports	Chemical Weapons Demil.and Disposal	5	12	93	Report
666	32	Other Reports	List of Hazardous Substances	1	13	93	Report
667	32	Other Reports	1990 Fee Adjustment	8	25	92	Letter
1206	32	Other Reports	Citizens' Environmental Protection Committee	7	0	92	Report
1857	32	Other Reports	Disposal of Chemical Weapons-Alt.Tech.	6	0	92	Paper
668	32	Other Reports	Chemical Demil POHC Evaluation	2	10	92	Letter
1568	32	Other Reports	All Fired Up	1	1	92	Report
669	32	Other Reports	Final Report- POHC Evaluation	11	12	91	Report
670	32	Other Reports	"Playing With Fire HW Incin"	10	5	91	Report
671	32	Other Reports	Engr Anlsis Chem Agnt Plnt	1	0	91	Report
673	32	Other Reports	Cryofracture/Tech. Assessment	0	0	91	Manual

Index of Administrative File  
Appendix 1

672	32	Other Reports	Stockpile Distrctn Delay Army Prototype Dpsel	7	0	90	Report
674	32	Other Reports	Nevada Draft DOD/IRP Agreement	5	17	90	Memo
675	32	Other Reports	Obstacles to Pln 2 Destry Stck	5	0	90	Report
676	32	Other Reports	Comments Draft Plan Test	12	22	89	Letter
677	32	Other Reports	Comments on Report by RWeston	6	21	89	Letter
678	32	Other Reports	Proposal for EPP & Systm for Chem Demil	3	1	89	Report
679	32	Other Reports	EPA Contract; Army CADF	12	22	88	Letter
680	32	Other Reports	Primary Combstn Chmbr	11	14	88	Report
681	32	Other Reports	Briefing EPA & State of Utah	4	28	88	Report
682	32	Other Reports	UMDA CAIRA Plan, Rvsns Rcmnded	4	21	88	Letter
683	32	Other Reports	GAO Report, Contrctr Indemnfcctn	3	28	88	Rules
684	32	Other Reports	Proposed Revisions to Annex C	2	26	88	Rvsns
685	32	Other Reports	2nd HW Inventory	2	10	88	Letter
686	32	Other Reports	Installatn Restrtn Prog Plan	2	0	88	Report
687	32	Other Reports	Request Doc Oprtn of DATs	10	27	87	Letter
688	32	Other Reports	Army Reports on Nerve Agent Incid. Tooele	9	22	87	Memo
689	32	Other Reports	Army Rprt Toole JACADs Nrv Agt	9	22	87	Memo
690	32	Other Reports	App for ACDP Reviewed By AQ Div	9	8	87	Letter
1410	32	Other Reports	Archeological Overview for UAD	9	0	87	Report
691	32	Other Reports	Sets of Text for RCRA HW Prmt	8	12	87	Letter
692	32	Other Reports	Data Bases for Chem Agents to be Destroyed	6	26	87	Letter
693	32	Other Reports	Downwind Hazard Plts Enclosed	6	11	87	Letter
694	32	Other Reports	Final Interim RCRA Facility Assessment	6	0	87	Report
695	32	Other Reports	Document and Needed Information	4	29	87	Memo
696	32	Other Reports	Houk's Statement of 3/26/87	3	26	87	Sttment
697	32	Other Reports	Liquid Incinerator Facility	3	20	87	Report
698	32	Other Reports	Health Aspects Emergency Respns	3	10	87	Report
699	32	Other Reports	PCB Update	3	3	87	Report
700	32	Other Reports	Army Doc Nerve Agent Exposure	12	22	86	Memo
701	32	Other Reports	Request of Technical Reports	11	12	86	Letter
702	32	Other Reports	Submittal of Additional Comments	10	21	86	Letter
703	32	Other Reports	When does a Waste Become a Waste?	10	20	86	Memo
1611	32	Other Reports	M55 Rocket Separation Study	11	22	85	Report
704	32	Other Reports	Rsk Asses. Rsk Mngmnt Toxic Sub	4	0	85	Report
705	32	Other Reports	Report of Chem Compositions	10	20	83	Report
706	32	Other Reports	Annex M OR State Emerg Oprtns Plan UCERP	1	0	80	Report
707	32	Other Reports	Phase I Lessons Learned	0	0	0	Report
708	40	Army Manuals	Contract TOCDF	7	20	93	Letter
711	40	Army Manuals	P-MOP Operator Certification Concurrence Sht	7	17	93	Report
709	40	Army Manuals	P-MOP Operator Certification Concurrence Sht	6	23	93	Report
710	40	Army Manuals	P-MOP Operator Certification Concurrence Sht	6	22	93	Report
712	40	Army Manuals	Reentry Planning	4	1	90	Report
713	40	Army Manuals	Evaluating Protctve Actns Chem Agent Emerg.	4	1	90	Report
714	40	Army Manuals	Oil & Hzdous Substnce ISCP	4	0	85	Report
715	40	Army Manuals	Oprtn DATs at Designated Military Installtns	6	0	83	Report
716	40	Army Manuals	Oprtn DATs at Designated Military Installtns	6	0	63	Report

Item B 000141

Index of Administrative File  
Appendix 1

717	40	Army Manuals	Engineering Design Handbook	12	15	78	Report
1418	50	Plans & Maps	On-site container O&M manual	11	30	95	Manual
718	50	Plans & Maps	Tooele RCRA Permit Drawings	2	24	89	Plans
2273	50	Plans & Maps	Figure 3-13, Unitized Total Deposition Rates	0	0	0	Map
2274	50	Plans & Maps	Figure 3-12, Unitized Air Prcolte Concentratio	0	0	0	Map
2275	50	Plans & Maps	Figure 3-11, Unitized Air Prcolte Cncntrtn	0	0	0	Map
2276	50	Plans & Maps	Figure 5-3, Wildlife Areas of Interest	0	0	0	Map
2277	50	Plans & Maps	Figure 3-10, Umatilla Watershed	0	0	0	Map
2278	50	Plans & Maps	Figure 3-9, Study Area Watershed	0	0	0	Map
2279	50	Plans & Maps	Figure 3-8, Selected Receptors	0	0	0	Map
2280	50	Plans & Maps	Figure 3-7, Polar, Boundary, & Discrete Recptr	0	0	0	Map
719	50	Plans & Maps	Sheet 1 of 3	0	0	0	Plans
720	50	Plans & Maps	Sheet 2 of 3	0	0	0	Plans
721	50	Plans & Maps	Sheet 3 of 3	0	0	0	Plans
722	50	Plans & Maps	Projectile/Mortar Processing	0	0	0	Plans
723	50	Plans & Maps	Provost Marshal - Regional Map	0	0	0	Map
724	50	Plans & Maps	Fig B-2-1 Topographic Map	0	0	0	Map
1033	50	Plans & Maps	Rmdl Actn Wrkpln	0	0	0	Map
1674	50	Plans & Maps	Munitions Processing Schematics	0	0	0	Plans
2320	55	Alt. Technologies	Explore M4, Chem Demil News	11	0	96	News
1988	55	Alternative Tech	Promise of Alternative Technologies	10	30	96	Report
1945	55	Alternative Tech	Thank you letter to Wendell Ford	9	14	96	Letter
1863	55	Alternative Tech	Alt Tech Program Evaluation report - DRAFT	9	9	96	Report
2270	55	Alternative Tech	Review & Evaluation of Alt Chem Dpsl Tech	9	0	96	Report
1862	55	Alternative Tech	Tech & Econ Analysis Comp Alt.Tech.to Baseline	7	0	96	Report
1634	55	Alternative Tech	ECO Logic Press Release	6	10	96	PressRls
1571	55	Alternative Tech	Plasma ARC & Quantum Tech, Houston	5	1	96	Report
1633	55	Alternative Tech	Exec.Summary Prelim RA of Alt Tech for Chem...	5	0	96	Report
1667	55	Alternative Tech	Prelim. R.A. of Alt Tech for Chem Demil	5	0	96	Report
1861	55	Alternative Tech	Pyro-Plasma Alternative Tech. requesting info	4	29	96	Letter
1860	55	Alternative Tech	Molten Metal Federal Register Information	4	8	96	FedReg
1595	55	Alternative Tech	Pyro-Plasma Process	3	21	96	Report
1596	55	Alternative Tech	Molten Metal Documents	2	27	96	Reports
1458	55	Alternative Tech	Supercritical H2O Oxidation Information	2	26	96	Report
1457	55	Alternative Tech	Molten Metal News Release	1	17	96	NewsRls
1456	55	Alternative Tech	Various Army Alt Tech. Outreach Material	12	0	95	Articles
1454	55	Alternative Tech	CDC Brochure Demil of Chemical Weapons	10	0	95	Brochure
1455	55	Alternative Tech	Ecologic Steam Processing	10	0	95	Report
1228	55	Alternative Tech	Advances in Altern Demil Tech - Wkshp	9	25	95	Report
1453	55	Alternative Tech	Application of the Silver(II) Process	9	25	95	Report
1059	55	Alternative Tech	Supercritical Water Oxidation Lit.	5	19	95	Brochure
1452	55	Alternative Tech	Chemical Reactions for Neutralising Chem...	5	1	95	MagArt
728	55	Alternative Tech	Supercritical Water Oxidation	6	29	94	Article
729	55	Alternative Tech	Destructive Desrptn Adsrptn Tech	6	13	94	FactSht
730	55	Alternative Tech	Chem Weap WorkGroup Conference	3	17	94	Memo
1426	55	Alternative Tech	Recommendations for Disposal	3	7	94	Report

Index of Administrative File  
Appendix 1

731	55	Alternative Tech	HyMelt Demonstration Project	2	18	94	Handout
639	55	Alternative Tech	Alt Tech Destruction of Chem Agents & Munition	8	2	93	Report
732	55	Alternative Tech	Mult. Alter. Studied Disposal	6	10	93	Release
733	55	Alternative Tech	Resource Recovery & Poll Prev	6	4	92	Handout
734	55	Alternative Tech	Destruction of Chemical Warfare Agents	6	4	92	Present
735	55	Alternative Tech	Chem Neutralization/Hydrolysis	0	0	0	Article
736	55	Alternative Tech	Prac Advantages Biodegradation	0	0	0	Handout
1948	60	Coop Agreement	Typo changes in FY97 Coop Agreement letter	10	16	96	Letter
1946	60	Coop Agreement	Funding Request FFY97	10	11	96	Letter
1947	60	Coop Agreement	Fax cover sheet for FY97 request	10	11	96	FaxCover
1711	60	Coop Agreement	Comments for 2nd and 3rd FFY Quarters	8	30	96	Figures
1865	60	Coop Agreement	Additional Funding Request-FY96	5	15	96	Letter
1864	60	Coop Agreement	Funding Info Req-FY95, Prelim Funding Req-FY96	5	5	96	Letter
1392	60	Coop Agreement	UAD FY96 Reports	3	19	96	Fax
737	60	Coop Agreement	Agreement Funding Request	9	8	95	Letter
738	60	Coop Agreement	Agreement Funding Request - FY95	3	30	95	Letter
739	60	Coop Agreement	Agreement Funding Request - FY95	2	28	95	Letter
740	60	Coop Agreement	Federal Fiscal Year 1995	0	0	95	Agreement
1169	60	Coop Agreement	FY95 Projected Expenditures Report	10	21	94	Report
741	60	Coop Agreement	Federal Fiscal Year 1994-3rd Q	7	20	94	Agreement
742	60	Coop Agreement	CDCAC Members Names & Addresses	12	16	93	List
743	60	Coop Agreement	Environmental Permitting Act.	6	23	93	Letter
744	60	Coop Agreement	HW Permitting Chem. Demil Facil.	10	9	92	Agreement
745	60	Coop Agreement	Construction Permit & Licenses	6	1	92	Letter
1540	61	Quarterly Reports	Activity Summary 1st Quarter FFY96	4	25	96	Report
1207	61	Quarterly Reports	Activity Rpt, 4th Quarter FFY 1995	11	7	95	Report
746	61	Quarterly Reports	4th Qtr 1994, Activity Rpt	2	28	95	Letter
1713	65	Facts & Studies	Chart of number of leakers at various ChemStoc	9	11	96	Memo
1868	65	Facts & Studies	Leaker Figures - All Sites	8	22	96	Memo
1949	65	Facts & Studies	Review of waste incineration research program	8	15	96	Letter
1869	65	Facts & Studies	Overheads of Quantitative Risk Assessment	8	6	96	Overheads
1712	65	Facts & Studies	Lower Columbia River Bi-State WQ Program	6	0	96	Report
1636	65	Facts & Studies	Chem Reactions for Neutralising Chemical...	5	1	96	Report
1574	65	Facts & Studies	Incinerator Air Emissions	12	0	95	Article
747	65	Facts & Studies	Expanding RFD Concept	10	0	95	Newslettr
1992	65	Facts & Studies	Pursian Gulf Review	8	0	95	Flyer
1870	65	Facts & Studies	Leaker Report from Army	7	10	95	Figures
1572	65	Facts & Studies	A Case Study of Municipal Waste incineration	7	0	95	Report
1967	65	Facts & Studies	Chemical Agent Testing Labs	5	24	95	List
1991	65	Facts & Studies	Agent Orange Review - Volume 11, No.2	5	0	95	Flyer
725	65	Facts & Studies	Risk Assessment Supporting Chem Demil	1	23	95	Handout
1638	65	Facts & Studies	Review Comments on PAS Air Filter System	11	14	94	Letter
1573	65	Facts & Studies	Health Assessment Studies	8	0	94	Report
748	65	Facts & Studies	Proposed Cleanup Plans	2	0	94	FactSheet
749	65	Facts & Studies	Explosive Washout Lagoons GW	2	0	94	FactSheet
750	65	Facts & Studies	Explosive Washout Plant	2	0	94	FactSheet



Index of Administrative File  
Appendix 1

751	65	Facts & Studies	Miscellaneous Sites Operable	2	0	94	FactSheet
752	65	Facts & Studies	SRI Study Sites & PCB Transfrm	2	0	94	FactSheet
753	65	Facts & Studies	Ammunition Demolition Activity	2	0	94	FactSheet
1635	65	Facts & Studies	Effect of Sulfur on Formation of PCDD/PCDF...	5	3	93	Report
1761	65	Facts & Studies	Incineration of Haz.Waste:A critical review...	1	0	93	Report
1575	65	Facts & Studies	Waste Wars:The Army opens new front	4	29	92	Article
1866	65	Facts & Studies	Dioxin Toxicity	6	0	90	Report
754	65	Facts & Studies	Intent to Deny HW Permit	8	30	89	FctSheet
755	65	Facts & Studies	Attached ORD Recommendations	12	7	87	Memo
756	65	Facts & Studies	Arsenic, Toxic Substances	6	0	87	FctSheet
757	65	Facts & Studies	Pentachlorophenol, Toxic Sub.	6	0	87	FctSheet
758	65	Facts & Studies	Triclopyr, Toxic Substances	6	0	87	FctSheet
759	65	Facts & Studies	PCB Cntmntd M55 Rockt Incin.	3	3	87	FctSheet
760	65	Facts & Studies	Agent Mustard	12	26	86	Info.Sht
761	65	Facts & Studies	Carcinogens in Drnk H2O Stndrds	8	21	86	Report
762	65	Facts & Studies	Bubbler Adsorption System	3	24	86	FactSheet
763	65	Facts & Studies	Liquid Incinerator Agnt Incinertn Tsts	2	0	86	Results
764	65	Facts & Studies	Lt Review of Thrml Decompostn Studies of Agnt	8	24	84	Rvw
2120	65	Facts & Studies	OR Dept of Veterans Affairs, Agent Orange	5	0	84	Guide
765	65	Facts & Studies	Nerve Agents Hndout #2	0	0	0	Hndout
766	65	Facts & Studies	HW Management Facility Permit	0	0	0	FactSheet
1990	65	Facts & Studies	Eval. & treatment of Post-traumatic stress...	0	0	0	Flyer
2163	70	News Articles	Kuma, EQC-pm	11	22	96	NewsArt
2018	70	News Articles	"Burn weapons at Umatilla"	11	21	96	NewsArt
2019	70	News Articles	"Weapons incineration - Burning questions"	11	21	96	NewsArt
2020	70	News Articles	"DeFazio opposes weapons incinerator"	11	21	96	NewsArt
2021	70	News Articles	"DeFazio opposes weapons burning"	11	21	96	NewsArt
2015	70	News Articles	"State may not approve Army's plan to incin..."	11	17	96	NewsArt
2016	70	News Articles	"State considers neutralization of mustard gas	11	17	96	NewsArt
2013	70	News Articles	"Details may delay permits for incinerator"	11	16	96	NewsArt
2014	70	News Articles	"State may bar burning of mustard gas supply"	11	16	96	NewsArt
2011	70	News Articles	"Tribes endorse draining rockets"	11	14	96	NewsArt
2012	70	News Articles	"Panel tabs stress as factor in many gulf..."	11	14	96	NewsArt
2010	70	News Articles	"Tribal testimony expected on chem weapons..."	11	12	96	NewsArt
2009	70	News Articles	"Schools fault CSEPP communication"	11	5	96	NewsArt
1994	70	News Articles	"Final hearings on disposal of nerve,mustard..	11	4	96	NewsArt
2008	70	News Articles	"Destroy the us chemical weapons stockpile"	11	1	96	WWWArt
2006	70	News Articles	"Hermiston wants US money to deal with..."	10	25	96	NewsArt
2007	70	News Articles	"Umatilla tribes, US Army pain to confer..."	10	25	96	NewsArt
2003	70	News Articles	"Umatilla Chem Depot to dedicate treatment..."	10	24	96	NewsArt
2004	70	News Articles	"Storing chemical weapons risky"	10	24	96	NewsArt
2005	70	News Articles	"Study: Disposal of chemicals safer"	10	24	96	NewsArt
2002	70	News Articles	"Study: Disposal safest choice"	10	23	96	NewsArt
2001	70	News Articles	"Agreement ensures Tribes and Army will keep..	10	18	96	NewsArt
2000	70	News Articles	"Army official outlines CSEPP changes"	10	17	96	NewsArt
1999	70	News Articles	"No 'leakers' found last quarter at Army Depot	10	14	96	NewsArt

Index of Administrative File  
Appendix 1

2134	70 News Articles	Video Tape: Nervous Alternatives	10	13	96	Video
1998	70 News Articles	"NRC favors incineration of stockpile"	10	8	96	NewsArt
1871	70 News Articles	"Utah town grows despite chem weapons plant"	10	6	96	NewsArt
1997	70 News Articles	"Safety remains key in Depot's plans"	10	0	96	NewsArt
1872	70 News Articles	"Study suggests destroying chem weapons with.."	9	25	96	NewsArt
1873	70 News Articles	"DOE says waste fr. Tennessee will go to Idaho"	9	24	96	NewsArt
1874	70 News Articles	"Clinton orders disposal assessment"	9	20	96	NewsArt
1875	70 News Articles	"Way clearing for emergency center"	9	20	96	NewsArt
1806	70 News Articles	"Politics bog treaty to ban chemical arms"	9	13	96	NewsArt
1995	70 News Articles	"Bayh says Army should consider options..."	9	12	96	NewsArt
1758	70 News Articles	"In Hermiston, all eyes are on Utah"	9	5	96	NewsArt
1805	70 News Articles	"Chem Weapons: Army Resumes Incineration at..."	9	3	96	PressRls
1996	70 News Articles	"Taking out the trash, Chemical Weapon Style"	9	0	96	NewsArt
1756	70 News Articles	"Other methods could sidestep incineration"	8	31	96	NewsArt
1757	70 News Articles	"Senator criticizes proposal to ship..."	8	31	96	NewsArt
1750	70 News Articles	"Investigation team dispatched to Tooele"	8	27	96	NewsArt
1751	70 News Articles	"Large crowd voices support for Army's..."	8	27	96	NewsArt
1752	70 News Articles	"The paper farmer"	8	27	96	NewsArt
1756	70 News Articles	"Leak halts incineration at Tooele, Utah"	8	27	96	NewsArt
1754	70 News Articles	"Incinerator leak under study"	8	27	96	NewsArt
1747	70 News Articles	"Leak detected at Tooele burner"	8	26	96	NewsArt
1748	70 News Articles	"Leak halts weapons incineration"	8	26	96	NewsArt
1749	70 News Articles	"Gas leak halts chemical weapons incineration"	8	26	96	NewsArt
1746	70 News Articles	"Umatilla's Deadly Dilemma"	8	25	96	NewsArt
1744	70 News Articles	"Chemical burn ground-rules aired"	8	24	96	NewsArt
1745	70 News Articles	"Commission works toward permit decision"	8	24	96	NewsArt
1738	70 News Articles	"Most at hearing endorse incineration"	8	23	96	NewsArt
1740	70 News Articles	"Chemicals: State will assess burner's..."	8	23	96	NewsArt
1741	70 News Articles	"Burning begins at Tooele"	8	23	96	NewsArt
1742	70 News Articles	"Oregon officials visit Umatilla Depot"	8	23	96	NewsArt
1743	70 News Articles	"Army burns chemical weapons"	8	23	96	NewsArt
1714	70 News Articles	"New Gulf War chemical report issued"	8	22	96	NewsArt
1733	70 News Articles	"Incineration begins on stockpile"	8	22	96	NewsArt
1734	70 News Articles	"Incineration of chemical weapons starts"	8	22	96	NewsArt
1735	70 News Articles	"Hearing tonight for depot burn plan"	8	22	96	NewsArt
1736	70 News Articles	"Chemical weapons set for burning"	8	22	96	NewsArt
1737	70 News Articles	"The EQC will meet..."	8	22	96	NewsArt
1685	70 News Articles	"Army site in Utah will start burning chem..."	8	21	96	NewsArt
1731	70 News Articles	"Army set to fire up Utah incinerator"	8	21	96	NewsArt
1732	70 News Articles	"Utah incinerator set to start burning..."	8	21	96	NewsArt
1684	70 News Articles	"Commission needs straight answers..."	8	20	96	NewsArt
1726	70 News Articles	"Surveys: Most people confident of incineration"	8	20	96	NewsArt
1727	70 News Articles	"Public comment sought on incineration"	8	20	96	NewsArt
1728	70 News Articles	"Public has chance to weigh in on Army's..."	8	20	96	NewsArt
1730	70 News Articles	"Judge refuses to block start up of Utah incin"	8	20	96	NewsArt
1725	70 News Articles	"Army to answer depot questions"	8	19	96	NewsArt

Item B 000145

Index of Administrative File  
Appendix 1

1682	70 News Articles	"Earlier Polls Were Better" - Stuart Dick	8	17	96 NewsArt
1723	70 News Articles	"Judge allows weapons incineration"	8	15	96 NewsArt
1724	70 News Articles	"Utah allowed to burn weapons"	8	15	96 NewsArt
1680	70 News Articles	"Judge rejects incineration hold"	8	14	96 NewsArt
1721	70 News Articles	"Judge won't halt weapons incinerator"	8	14	96 NewsArt
1678	70 News Articles	"Sealed Tight-DEQ say nerve gas incin.risk..."	8	13	96 NewsArt
1679	70 News Articles	"Army to answer Depot questions"	8	13	96 NewsArt
1677	70 News Articles	"Poll gives new take on Depot attitudes"	8	10	96 NewsArt
1719	70 News Articles	"Tri-Citians have fewer fears of depot plans"	8	10	96 NewsArt
1676	70 News Articles	"Weapons Diposal Guidelines Outlined"	8	6	96 NewsArt
1717	70 News Articles	"Depot information effort has fallen short"	8	1	96 NewsArt
1718	70 News Articles	"DEQ sets meetings on incineration"	8	1	96 NewsArt
1648	70 News Articles	"Public Wary of Army plans"	7	30	96 NewsArt
1715	70 News Articles	"Debate over chemical leaks heats up"	7	27	96 NewsArt
1716	70 News Articles	"More detailed picture of 'leakers' emerges"	7	27	96 NewsArt
1647	70 News Articles	"Weapons incineration report risk data rlsd..."	7	24	96 NewsArt
1646	70 News Articles	"Whistleblower testifies in Army incinerator..."	7	23	96 NewsArt
1640	70 News Articles	"Army: Burning best for nerve gas"	7	12	96 NewsArt
1641	70 News Articles	"Unfiltered testimony-public deserves..."	7	12	96 NewsArt
1642	70 News Articles	"US Army emphatically endorses incineration"	7	12	96 NewsArt
1643	70 News Articles	"Burning best for nerve gas, Army says"	7	12	96 NewsArt
1644	70 News Articles	"Depot burn backers light up meeting w/facts"	7	12	96 NewsArt
1622	70 News Articles	"Concern over depot emergency preparations..."	7	6	96 NewsArt
1621	70 News Articles	"Stay put if nerve gas accident occurs..."	7	5	96 NewsArt
1618	70 News Articles	"Officials advise staying put in a release..."	7	4	96 NewsArt
1619	70 News Articles	"Kitzhaber questions depot safety"	7	4	96 NewsArt
1620	70 News Articles	"Gov.Kitzhaber questions weapons depot..."	7	4	96 NewsArt
1876	70 News Articles	"Weapons depot raises fears"	7	4	96 NewsArt
1616	70 News Articles	"Judge throws out 7 counts in Tooele..."	7	2	96 NewsArt
1617	70 News Articles	"Incinerator Lawsuit"	7	2	96 NewsArt
1615	70 News Articles	"More plutonium may have escaped Hanford"	7	1	96 NewsArt
1614	70 News Articles	"Shelter in place'touted as best reaction..."	6	29	96 NewsArt
1613	70 News Articles	"Utah approves chemical incineration"	6	27	96 NewsArt
1612	70 News Articles	"Army aboveboard"	6	25	96 NewsArt
1591	70 News Articles	"Objectivity depends on your distance..."	6	20	96 NewsArt
1877	70 News Articles	"County officials return w/confidence in..."	6	18	96 NewsArt
1590	70 News Articles	"Army releases impact statement"	6	15	96 NewsArt
2128	70 News Articles	Weapons Incinerator Comment Period Extended	6	15	96 NewsArticle
1589	70 News Articles	"Questions remained unanswered"	6	12	96 NewsArt
1588	70 News Articles	"Incineration plan concerns voiced"	6	11	96 NewsArt
1587	70 News Articles	"Living with uncertainty in Army Depot's..."	6	10	96 NewsArt
1586	70 News Articles	"Hermiston incineration hearing scheduled"	6	8	96 NewsArt
1545	70 News Articles	"Kitzhaber Delays permits on depot's burning..."	6	5	96 NewsArt
1543	70 News Articles	"Around the Northwest"	5	29	96 Cable Brief
1544	70 News Articles	"Chemical Weapons Controversy"	5	29	96 NewsArt
1541	70 News Articles	"New Members join chemical advisory group"	5	27	96 NewsArt

Index of Administrative File  
Appendix 1

1542	70 News Articles	"Oregon becomes hot spot of tourist industry"	5	27	96 NewsArt
1539	70 News Articles	"Examine Alternatives"	5	24	96 NewsArt
1878	70 News Articles	"DEQ assessment right on" - Jack Blackwell	5	21	96 NewsArt
1525	70 News Articles	"Depot disposal plan attacked"	5	18	96 NewsArt
1524	70 News Articles	"Incineration Alternatives discussed"	5	17	96 NewsArt
1879	70 News Articles	Cartoon of chemical demilitarization issue	5	16	96 NewsArt
1523	70 News Articles	"Incineration foes, friends, speak minds..."	5	14	96 NewsArt
1522	70 News Articles	"Comment sought on Depot Plan"	5	11	96 NewsArt
1521	70 News Articles	"If disaster struck Umatilla Depot"	5	10	96 NewsArt
1520	70 News Articles	"Army Study: Chem weapons stable"	5	4	96 NewsArt
1519	70 News Articles	"Incineration office to open"	5	1	96 NewsArt
1881	70 News Articles	"Don't delay nerve gas disposal"	4	28	96 NewsArt
1518	70 News Articles	"Incineration friends and foes"	4	27	96 NewsArt
1517	70 News Articles	"Army gets ready to burn cache of chemical..."	4	19	96 NewsArt
1516	70 News Articles	"EPA Proposing changes to screen cancer..."	4	16	96 NewsArt
1485	70 News Articles	"Commission plans tour of Tooele incinerator"	4	13	96 NewsArt
1515	70 News Articles	"Treatment Storage of Chemicals Weapons..."	4	12	96 MagArt
1484	70 News Articles	"Dueling Studies add to the controversy"	4	10	96 NewsArt
1514	70 News Articles	"Chemical weapons battle off to court"	4	10	96 NewsArt
1483	70 News Articles	"State study: Incineration poses no risks"	4	9	96 NewsArt
1482	70 News Articles	"Researcher says incineration increases risk"	4	8	96 NewsArt
1450	70 News Articles	"Time to move on Depot"	4	6	96 NewsArt
1451	70 News Articles	"Burning gas risky, Umatilla study says"	4	6	96 NewsArt
1446	70 News Articles	"Reservation not a depot disaster evac. zone"	4	5	96 NewsArt
1448	70 News Articles	"Consider Army's record"	4	5	96 NewsArt
1449	70 News Articles	"Express your opinions about chemical..."	4	5	96 NewsArt
1445	70 News Articles	"Governor, Tribes talk incineration"	4	4	96 NewsArt
1444	70 News Articles	"Don't rush gas disposal"	4	1	96 NewsArt
1443	70 News Articles	"Testimony in whistleblower hearing..."	3	30	96 NewsArt
1442	70 News Articles	"Tribes astonished by gas burning plan"	3	29	96 NewsArt
1441	70 News Articles	"Tribes blast Army evacuation plan"	3	28	96 NewsArt
1438	70 News Articles	"Tooele Safety attitudes attacked"	3	27	96 NewsArt
1439	70 News Articles	"NRC Reviews Tooele incinerator"	3	27	96 NewsArt
1440	70 News Articles	"Make deliberate decision regarding..."	3	27	96 NewsArt
1401	70 News Articles	"Kitzhaber may slow papers for Army..."	3	26	96 NewsArt
1437	70 News Articles	"Gov. would consider some burner delay"	3	26	96 NewsArt
1481	70 News Articles	"Terrifying cache faces destruction"	3	26	96 NewsArt
1436	70 News Articles	"Army hopes to fire up chemical weapons..."	3	25	96 NewsArt
1435	70 News Articles	"Incinerator complaints to be aired"	3	25	96 NewsArt
1396	70 News Articles	"Community's silence deafening on Army's..."	3	25	96 NewsArt
1397	70 News Articles	"AG quashes incinerator moratorium"	3	19	96 NewsArt
1398	70 News Articles	"Morrow Co. residents file for commission..."	3	19	96 NewsArt
1399	70 News Articles	"Army outreach office benefits for both..."	3	19	96 NewsArt
1400	70 News Articles	"Army opens outreach office"	3	19	96 NewsArt
1395	70 News Articles	"Umatilla Army Depot staff hunts leakers"	3	16	96 NewsArt
1434	70 News Articles	"N-waste conversion into glass begins"	3	13	96 NewsArt

Item B 000147

Index of Administrative File  
Appendix 1

1252	70 News Articles	"Burn that poison gas"	3	11	96 NewsArt
1251	70 News Articles	"State, county discuss dispute over CSEPP"	3	9	96 NewsArt
1433	70 News Articles	"There's no need for haste on nerve gas..."	3	9	96 NewsArt
1250	70 News Articles	"Kitzhaber may not have power to delay..."	3	4	96 NewsArt
1394	70 News Articles	"Tooole Looses Support"	3	4	96 Mag Art
1199	70 News Articles	"Stop stalling, burn the stuff"	3	1	96 NewsArt
1200	70 News Articles	"State won't make quick decision..."	3	1	96 NewsArt
1249	70 News Articles	"Destroy Umatilla weapons"	3	1	96 NewsArt
1170	70 News Articles	"Ore+D2126 congressman asks Governor to halt w	2	26	96 NewsArt
1197	70 News Articles	"War of Words"	2	24	96 NewsArt
1198	70 News Articles	"No More Hermiston"	2	24	96 NewsArt
1193	70 News Articles	"Weapons burning spurs concern"	2	23	96 NewsArt
1194	70 News Articles	"Governor asked to delay weapons-burning plans	2	23	96 NewsArt
1195	70 News Articles	"Governor asked to delay weapons burning"	2	23	96 NewsArt
1196	70 News Articles	"DeFazio adds his voice to request..."	2	23	96 NewsArt
1248	70 News Articles	"Nerve gas burning plan fuels debate"	2	23	96 NewsArt
1192	70 News Articles	"Mayors Call for Incinerator Action"	2	22	96 NewsArt
1247	70 News Articles	"Mayors rally around depot weapons burn"	2	22	96 NewsArt
1246	70 News Articles	"Delay warranted for incinerator at UAD"	2	21	96 NewsArt
1243	70 News Articles	"Cynicism enhanced"	2	20	96 NewsArt
1244	70 News Articles	"Mayor eyes support for burning weapons"	2	20	96 NewsArt
1245	70 News Articles	"Time Out': Tribes seek halt to incin.plan..."	2	20	96 NewsArt
1242	70 News Articles	"DEQ forges ahead on incinerator review"	2	17	96 NewsArt
1241	70 News Articles	"Tribes seek incinerator moratorium"	2	15	96 NewsArt
1240	70 News Articles	"Incineration Debate filled w/misinformation"	2	13	96 NewsArt
1171	70 News Articles	"Chemical Time Bombs"	2	12	96 NewsArt
1172	70 News Articles	See Various Highlighted Articles	2	9	96 MagArt
1393	70 News Articles	"The Military's Mess - Johnston Atoll..."	2	0	96 Mag Art
1065	70 News Articles	"Binary Weapons"	1	25	96 NewsArt
1064	70 News Articles	"DEQ briefed on weapons incineration"	1	12	96 NewsArt
1060	70 News Articles	"Chemical agent leaks at Umatilla"	1	10	96 NewsArt
1063	70 News Articles	"Army Analyzing Cost,benefits of using enzymes	1	8	96 MagArt
1040	70 News Articles	"Tooole whistleblower turns attention to UAD"	1	1	96 NewsArt
1062	70 News Articles	"Whistle-blower paints deadly scenario"	12	31	95 NewsArt
1061	70 News Articles	"State Begins Assessment of Incinerator Risks"	12	28	95 NewsArt
1189	70 News Articles	"Chem weapons whistleblower sched for court..."	12	27	95 MagArt
1257	70 News Articles	"Indian Tribe Rejects Navy offer for..."	12	27	95 MagArt
767	70 News Articles	"Utah officials question start up date..."	12	5	95 MagArt
1432	70 News Articles	"Lets not rush when our health is on the line"	12	5	95 NewsArt
1431	70 News Articles	"Nerve gas incinerator const. contract near"	11	30	95 NewsArt
1038	70 News Articles	"Residents agree toxins must go,disagree..."	11	29	95 NewsArt
1430	70 News Articles	"We need dose of truth" - 'Dutch' Meyers	11	29	95 NewsArt
1585	70 News Articles	"Nerve gas incinerator plans studied again"	11	16	95 NewsArt
768	70 News Articles	"Army looks at new ways to destroy nerve gas"	11	15	95 NewsArt
1258	70 News Articles	"US-Russian Chem Weapons Incineration..."	11	15	95 MagArt

Index of Administrative File  
Appendix 1

1191	70 News Articles	"Exhuming the Cold War's Deadly Crypts"	11	12	95 NewsArt
769	70 News Articles	"Army chem incinerator faces two hurdles"	11	5	95 NewsArt
770	70 News Articles	"Greatest risk is waiting" - Frank Harkenrider	11	4	95 NewsArt
771	70 News Articles	"Opponents challenge nerve gas incineration"	11	4	95 NewsArt
772	70 News Articles	"Incinerator must pass 2 environmental reviews"	11	3	95 NewsArt
1039	70 News Articles	"Army pursues bioremediation on explosives..."	11	0	95 MagArt
773	70 News Articles	"DEQ calls hearings on plan for incinerator..."	10	26	95 NewsArt
774	70 News Articles	"Jones to attend environment conference"	10	16	95 NewsArt
775	70 News Articles	"Law group to file suit over planned army..."	10	4	95 MagArt
776	70 News Articles	"The nerve gas incineration merry-go-round"	7	21	95 NewsArt
1880	70 News Articles	"Lt.Col.Marie Baldo takes over"	7	20	95 NewsArt
1403	70 News Articles	"Funding approved for Army incinerator"	6	20	95 NewsArt
777	70 News Articles	"It'd be quicker & safer to reconfigure M-55s"	5	15	95 NewsArt
778	70 News Articles	"Hot water, sludge may be answer to mustard gas"	5	9	95 NewsArt
1402	70 News Articles	"New process tested for destroying mustard..."	5	8	95 NewsArt
779	70 News Articles	"Weapons vapor leaks found"	3	29	95 NewsArt
780	70 News Articles	"Incineration said unsafe at any speed"	3	28	95 NewsArt
781	70 News Articles	"EPA fines Army over nerve gas safety error"	3	17	95 NewsArt
782	70 News Articles	"Nerve gas release nets fine"	3	16	95 NewsArt
783	70 News Articles	"Army responds to EPA citation"	3	14	95 PressRls
784	70 News Articles	"GAO faults Army on nerve gas plans"	3	2	95 NewsArt
785	70 News Articles	"Ore-group defends storage of nerve gas"	2	22	95 NewsArt
786	70 News Articles	"Stop Incineration" - Stuart Dick	2	4	95 NewsArt
787	70 News Articles	"Depot workers face renewed layoff threat"	2	3	95 NewsArt
788	70 News Articles	"Weapons threat exists either way"	1	31	95 NewsArt
1639	70 News Articles	"Army Releases Report on M55 rocket storage..."	1	23	95 NewsRls
789	70 News Articles	"Omatilla Depot Plan Risky, GAO says"	1	17	95 NewsArt
790	70 News Articles	"Gas Pains"	11	16	94 NewsArt
791	70 News Articles	"If You Hear the Alarm..."	10	31	94 MagArt
792	70 News Articles	"Speedy St Prmt Eludes Army Inc"	10	25	94 NewsArt
793	70 News Articles	"Army Wants Hastened Inc Appl"	10	19	94 NewsArt
794	70 News Articles	"Inc Go Despite Lack of Permit"	10	18	94 NewsArt
795	70 News Articles	"Cold War Cleanup Frustrating"	10	16	94 NewsArt
796	70 News Articles	"Army Hopes to Speed Work Inc"	10	13	94 NewsArt
797	70 News Articles	"House to Investigate Utah..."	9	27	94 NewsArt
798	70 News Articles	"Army Invest Conditions @Tooele"	9	24	94 NewsArt
799	70 News Articles	"Challenging Incineration"	9	22	94 NewsArt
800	70 News Articles	"Turning Closure to Opportunity"	9	22	94 NewsArt
801	70 News Articles	"Incinerator Success Argued"	9	21	94 NewsArt
802	70 News Articles	"Incinerator Funding Delayed"	9	21	94 NewsArt
2132	70 News Articles	"M-55 Rocket Cause for Concern"	9	21	94 NewsArt
803	70 News Articles	"UT Incinerator Ready to Burn"	9	20	94 NewsArt
804	70 News Articles	"Tooele, UT Strikingly Similar"	9	20	94 NewsArt
2133	70 News Articles	"Incinerator will Bring Good Jobs to Area"	9	20	94 NewsArt
805	70 News Articles	"Evidence Shows Clear..."	9	12	94 NewsArt
806	70 News Articles	"Army Data was a Surprise"	9	10	94 NewsArt

Index of Administrative File  
Appendix 1

807	70 News Articles	"Tiny Leaks Found..."	9	7	94 NewsArt
808	70 News Articles	"Nerve Gas Leaks in Bunker"	9	7	94 NewsArt
809	70 News Articles	"Playing Chicken w/Chem Weap"	9	1	94 NewsArt
810	70 News Articles	"Army Owes Us Answers"	8	17	94 NewsArt
811	70 News Articles	"Risk of Weapons Lowered"	8	11	94 NewsArt
812	70 News Articles	"Weap Incineration Permitting"	7	1	94 MagArt
813	70 News Articles	"Alternatives To Burning"	6	30	94 NewsArt
814	70 News Articles	"1995 Too Optimistic"	6	29	94 NewsArt
815	70 News Articles	"...Recognize Danger of Delay?"	6	8	94 NewsArt
816	70 News Articles	"Incin Eff Not Like Russia's"	5	25	94 NewsArt
817	70 News Articles	"Incinerator Delays-Big Risk"	5	24	94 NewsArt
818	70 News Articles	"In Disposing of Posion Gas"	5	22	94 NewsArt
819	70 News Articles	Mustard-gas tab: \$1 billion	5	22	94 NewsArt
820	70 News Articles	State May Decide Fate	5	18	94 MagArt
821	70 News Articles	"Inc Study Skips Crucial Data"	5	11	94 NewsArt
822	70 News Articles	"DEQ Opens Hermiston Office"	5	6	94 NewsArt
823	70 News Articles	"DEQ Opens Office -Depot Proj"	5	6	94 NewsArt
824	70 News Articles	"The Env: A Growth Industry"	5	1	94 MagArt
825	70 News Articles	"Incinerator Seems to be OK..."	4	26	94 NewsArt
826	70 News Articles	"Inc Should Proceed Nerve Gas"	4	26	94 NewsArt
828	70 News Articles	"Plan- Burn Chem Divides Herm"	4	14	94 NewsArt
829	70 News Articles	"Incineration Support Tabled"	3	31	94 NewsArt
830	70 News Articles	"Critique of Incin Proposal"	3	18	94 MagArt
831	70 News Articles	"Mock Army Depot Disaster Test"	3	10	94 NewsArt
832	70 News Articles	Risk Assessment Methods	2	4	94 MagArt
833	70 News Articles	Inc Permits Demand New Tactics	2	1	94 MagArt
834	70 News Articles	"A Burning Question"	12	12	93 NewsArt
835	70 News Articles	"Tips on Fleeing Home"	12	12	93 NewsArt
836	70 News Articles	Affidavit of Publication	12	28	92 Affidavit
837	70 News Articles	Affidavit of Publication	12	15	92 Affidavit
838	70 News Articles	Cntmnte Crops, Hrt Economy	11	17	92 NewsArt
839	70 News Articles	Zapping Old Chem Weapons More Than a Burning Q	7	8	92 NewsArt
840	70 News Articles	Incinerators Spark Fears	6	9	92 NewsArt
841	70 News Articles	Weapons Burning Discussed Tonight	3	17	92 NewsArt
844	70 News Articles	Storing Aging Chemicals	10	31	91 NewsArt
845	70 News Articles	Chem Weapons Disposal Prog in Doubt	5	31	91 NewsArt
846	70 News Articles	US Plan to Burn Chem Weapons Strs Pblic Fear	5	2	91 NewsArt
847	70 News Articles	Altnv Evactn Hazmat Emerg.	12	0	90 NewsArt
848	70 News Articles	Weapons Destruction Expensive	11	18	90 NewsArt
849	70 News Articles	Johnston Atoll	11	12	90 NewsArt
850	70 News Articles	US Hlping Svlets Destroy Poiso	6	8	90 NewsArt
851	70 News Articles	Nuclear Weapons Reduction	6	2	90 NewsArt
852	70 News Articles	Cleanup for Depot Soil	12	27	89 NewsArt
853	70 News Articles	Public Health Protection	10	0	89 NewsArt
854	70 News Articles	Incineration Rouses Opposition	9	26	89 NewsArt
855	70 News Articles	Beyond Waste: Assurance Plan	9	0	89 NewsArt

Index of Administrative File  
Appendix 1

856	70 News Articles	Court Rules States May Not Recover Penalties	2	28	89	Litigatn
857	70 News Articles	Weapons Incinerator Public Use	2	20	89	NewsArt
858	70 News Articles	Incinerator for Nerve Gas Only	2	17	89	NewsArt
859	70 News Articles	Stringent Optn Assured Disposl of Chem Agnts	2	17	89	NewsArt
860	70 News Articles	Incin Plan Brings Criticism	2	16	89	NewsArt
861	70 News Articles	Loss of Civilian Jobs	12	30	88	NewsArt
1238	70 News Articles	"Army Cautious on Shipping Aberdeen Toxins"	11	30	88	NewsArt
862	70 News Articles	Defense Firms win Major Legal Victory	6	28	88	NewsArt
863	70 News Articles	Chemical Weapons up in Smoke	6	0	88	NewsArt
864	70 News Articles	State Fears Losing Role in Cleanup at Hanfrd	4	7	88	NewsArt
865	70 News Articles	Extend Chem. Arms Deadline	3	18	88	NewsArt
866	70 News Articles	Quandary at Aberdeen	3	15	88	NewsArt
867	70 News Articles	Army to Burn Chem Agnts Aberdn	2	24	88	NewsArt
868	70 News Articles	Delay in Plans to Burn Arms	2	1	88	NewsArt
869	70 News Articles	Lugar is 'Against Nerve Gas Pln	1	26	88	NewsArt
870	70 News Articles	Nerve Gas Burner Coming?	1	8	88	NewsArt
873	70 News Articles	Incinerate On-Site	5	26	87	NewsArt
874	70 News Articles	Witnesses Fght Pln Brn Chem Arm	3	4	87	NewsArt
891	70 News Articles	Report to EPA on Johnston Islnd Strge Incndnt	3	2	87	NewsArt
875	70 News Articles	Nerve Gas Inspection Lagging	2	5	87	NewsArt
876	70 News Articles	Disposal of Chemical Munitions	7	0	85	NewsArt
878	70 News Articles	Nerve Gas Poisoning in Sheep	4	15	70	NewsArt
879	70 News Articles	Dugway Accident, Sheep Kill	12	27	68	NewsArt
880	70 News Articles	"America's Toxic Messes"	10	5	0	NewsArt
881	70 News Articles	Depot Checks Weapons Weekly	0	0	0	NewsArt
882	70 News Articles	Incinerate Poison Gas	0	0	0	NewsArt
883	70 News Articles	Long-Term Strge Increses Danger	0	0	0	NewsArt
884	70 News Articles	Incin. Safe, Pivotal Year	0	0	0	NewsArt
885	70 News Articles	Army on Hot Seat for Hazardous Waste Plan	0	0	0	NewsArt
888	70 News Articles	Closing of Fort McClellan	0	0	0	NewsArt
889	70 News Articles	Military HW Escape Rules	0	0	0	NewsArt
890	70 News Articles	Browder to Fight Weapons Disposal	0	0	0	NewsArt
1889	75 Public Outreach	Pres.executive order forces army's hand...	9	18	96	NewsRls
1722	75 Public Outreach	"The EQC will host 2 days of meetings..."	8	15	96	RadioNews
1681	75 Public Outreach	"Utah chemical arms destruction to start..."	8	14	96	NewsRls
1720	75 Public Outreach	"Torch it."	8	12	96	RadioNews
1888	75 Public Outreach	Chem Weap:New Army info shows leaks not increa	7	31	96	PressRls
1645	75 Public Outreach	"State officials admit to supressing..."	7	23	96	NewsRls
1887	75 Public Outreach	Bayh says army should consider options...	7	12	96	PressRls
1807	75 Public Outreach	Stop Chem Weapons incineration in Oregon	7	5	96	Flyer
1549	75 Public Outreach	Greenlaw Injunction at Tooele	6	12	96	Memo
1766	75 Public Outreach	Governor supports more public comment on...	6	4	96	PrsRelease
1546	75 Public Outreach	Greenpeace Documents	6	3	96	Documents
2036	75 Public Outreach	Chemical Weapons Controversy-News release	5	29	96	NewsRls
1576	75 Public Outreach	New report debunks myth on state incineration	5	22	96	Article
1886	75 Public Outreach	Action Alert	5	16	96	Flyer

Item B 000151



Index of Administrative File  
Appendix 1

1239	75	Public Outreach	"US-Russian activists issue statement on ..."	10	25	95	MagArt
1762	75	Public Outreach	Open Forum-Hermiston Community Center-11/2/95	10	12	95	MtgNotice
1764	75	Public Outreach	ChemDemil, Reviewing Alt Tech of Chem.Weapons	10	0	95	Flyer
892	75	Public Outreach	Chem. Agent Stockpile Incinerat	5	26	95	Letter
893	75	Public Outreach	CDCAC Meeting Notice	3	2	95	Notice
1763	75	Public Outreach	Medical Prep.for areas near chem.weapons sites	0	0	95	Flyer
1067	75	Public Outreach	Community Surveys by Army	11	1	94	Report
1895	75	Public Outreach	Demilitarization on Chemical Weapons	5	0	94	Brochure
1765	75	Public Outreach	Demilitarization of Chemical Weapons	8	0	93	Flyer
894	75	Public Outreach	A Chance to Comment On:D2135 Closure	1	22	93	Flyer
895	75	Public Outreach	A Chance to Comment On: Closure	12	27	91	Flyer
896	75	Public Outreach	A Chance to Comment On: Clsire	9	7	90	Flyer
897	75	Public Outreach	Intent to Jointly Deny Permit	8	30	89	Notice
898	75	Public Outreach	Public Info Needs Assessment	10	9	87	Report
899	75	Public Outreach	Radio Deny HW Treatmnt Permit	0	0	0	Announcemnt
913	75	Public Outreach	US Chem Warfare Stockpiles	0	0	0	Flyer
1882	75	Public Outreach	Monitoring Chemical Agents	0	0	0	Flyer
1893	75	Public Outreach	Chemical Weapons Incinerators	0	0	0	Flyer
1884	75	Public Outreach	Alt Methods of Disposing of stockpiled...	0	0	0	Flyer
2038	76	Pub Outreach/Army	Public notice of public comment period closure	11	12	96	Notice
2037	76	Pub Outreach/Army	Tooele Bi-Weekly update #2	11	7	96	PressRls
1890	76	Pub Outreach/Army	Updates and Happenings at UAD	10	3	96	Letter
1809	76	Pub Outreach/Army	Alt. Tech. program evaluation report	9	11	96	Report
2039	76	Pub Outreach/Army	"Continental Chemical Weapons Disposal begins"	9	0	96	Newsltr
1755	76	Pub Outreach/Army	"Disposal operations to resume at the Tooele..	8	30	96	PressRls
1842	76	Pub Outreach/Army	News Release re: Tooele release	8	25	96	NewsRls
1892	76	Pub Outreach/Army	Chemical Event at Anniston Army Depot	8	11	96	Media Advis
1649	76	Pub Outreach/Army	Alternative Tech. Outreach Materials	7	11	96	Brochures
1623	76	Pub Outreach/Army	Press release-Utah approves disposal permit	6	26	96	Pressrls
1808	76	Pub Outreach/Army	Umatilla Area Baseline Survey	4	0	96	Report
1212	76	Pub Outreach/Army	"Army Destroys Agent-Filled Bombs..."	3	1	96	NewRls
1404	76	Pub Outreach/Army	Chem Demil Update Volume 4, Issue 1	3	0	96	Publication
1068	76	Pub Outreach/Army	Chemical Weapons Stockpile Declassified	1	22	96	Report
900	76	Pub Outreach/Army	Chem Demil Update:Army Wrkshop	11	0	95	Flyer
901	76	Pub Outreach/Army	Chem Demil Update:JACADS M-55	9	0	95	Flyer
1174	76	Pub Outreach/Army	Chemical Event at Anniston Army Depot	8	1	95	Notice
902	76	Pub Outreach/Army	Chem Demil Update:Commnty Voice	7	0	95	Flyer
903	76	Pub Outreach/Army	Chem Agent Detected	5	9	95	Advzry
904	76	Pub Outreach/Army	Chem. Demiltrzn Update	5	1	95	Flyer
905	76	Pub Outreach/Army	CSEPP Exercise	4	10	95	Exrcse
906	76	Pub Outreach/Army	Chem Demiltrzn Remedtn Actvty	3	2	95	Handout
908	76	Pub Outreach/Army	Detects Trace Amt of Chem Agnt	2	2	95	NewsRels
907	76	Pub Outreach/Army	Chem Demilitrization Update	2	0	95	Handout
909	76	Pub Outreach/Army	Quick Facts	10	25	94	Fax
910	76	Pub Outreach/Army	Demil Prog Under Singl Command	10	1	94	Flyer
911	76	Pub Outreach/Army	Release Rprt on Alter Techn	4	1	94	Flyer

Index of Administrative File  
Appendix 1

912	76	Pub Outreach/Army	What's Stored at Umatilla	0	0	0	0	Flyer
1173	76	Pub Outreach/Army	JACADS - Johnston Atoll Chemical Agent Disp.	0	0	0	0	Brochure
2041	77	Pub Outreach/DEQ	UAD Community Assessment Tracking Survey"	7	0	0	96	Report
1488	77	Pub Outreach/DEQ	Meeting Notice Open House 4-27-96	4	22	96	96	Notice
1891	77	Pub Outreach/DEQ	Pub comment opens on proposed UAD incinerator	4	3	96	96	NewRise
1405	77	Pub Outreach/DEQ	EQC UAD Briefings for chem weapon facility	3	26	96	96	Notice
2307	77	Pub Outreach/DEQ	Open Forum-Risk Assessment	11	2	95	95	Cassette
2308	77	Pub Outreach/DEQ	Open Forum-Risk Assessment	11	2	95	95	Cassette
914	77	Pub Outreach/DEQ	Meeting Notice Open Forum	10	12	95	95	Flyer
915	77	Pub Outreach/DEQ	Fact Sht #4 Risk Assess. Basics	8	10	95	95	Flyer
916	77	Pub Outreach/DEQ	Mtg. Notice CDCAC	8	2	95	95	Flyer
917	77	Pub Outreach/DEQ	Topics at Umatilla Pub Out	7	25	95	95	Handout
919	77	Pub Outreach/DEQ	Meeting Notice CDCAC	4	5	95	95	Notice
1486	77	Pub Outreach/DEQ	DEQ to hold open house on proposed UMCDF	11	10	94	94	Newsrls
1185	77	Pub Outreach/DEQ	UADC Fact Sheet #2 - Environmental Permits	8	0	94	94	Flyer
918	77	Pub Outreach/DEQ	Hrmstn Progress Report & To Do	5	23	94	94	Report
920	77	Pub Outreach/DEQ	UADC Weapons Destruction Fact Sheet #1	0	0	0	0	FctSheet
921	77	Pub Outreach/DEQ	Spanish Fact Sheet	0	0	0	0	FactSheet
922	77	Pub Outreach/DEQ	DEQ Permits and the Public Process	0	0	0	0	Handout
1577	78	Pub Outreach/EPA	Revised Technical Standards for HW Combust.	5	20	96	96	Memo
1893	78	Pub Outreach/EPA	Strategy Update:HW minimization & combustion	3	0	96	96	NewsLetter
1187	78	Pub Outreach/EPA	Response to KHarris Letter	2	6	96	96	Letter
923	78	Pub Outreach/EPA	Waste Minimization	9	1	94	94	Flyer
2305	78	Pub Outreach/EPA	EPA Admin Announces New HW Rdctn & Cmbstn Stra	5	18	93	93	Report
924	78	Pub Outreach/EPA	National Priorities List Sites	9	1	91	91	Flyer
925	78	Pub Outreach/EPA	Design & Constr of RCRA/CERCLA	5	1	91	91	Fax
1069	78	Pub Outreach/EPA	Understanding Env. Health Risks...	9	0	90	90	Pamphlet
2083	80	CSEPP	Comments to be entertained by EQC	11	13	96	96	Letter
2075	80	CSEPP	November 5-6, 1996 Agenda Proposal	10	14	96	96	Memo
1894	80	CSEPP	Draft UMCDF compliance requirements & schedule	10	2	96	96	List
1895	80	CSEPP	CAIR plan synchronization time period H(sync 1)	10	1	96	96	Report
1896	80	CSEPP	Response to G&D Nelson 4/11/96 letter	9	23	96	96	Letter
1698	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	96	Letter
1599	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	96	Letter
1700	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	96	Letter
1701	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	96	Letter
1702	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	96	Letter
1697	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	15	96	96	Letter
1810	80	CSEPP	Governor's CSEPP concerns for FEMA and Army	7	1	96	96	Letter
2081	80	CSEPP	Permit Conditions II.H.4.b and II.H.4.c	6	20	96	96	Letter
2082	80	CSEPP	Sufficient level of Preparedness now exists	6	17	96	96	Letter
1624	80	CSEPP	CSEPP National Conference - 5/21-24/96	5	29	96	96	Memo
1696	80	CSEPP	Emergency Medical Preparedness Plan	5	29	96	96	Letter
1511	80	CSEPP	CSEPP Hazard Specific Annex to the state EOP	5	15	96	96	Letter
1898	80	CSEPP	CSEPP Exercise 5/9/95 report	5	14	96	96	Memo
1695	80	CSEPP	CSEPP Hazard Specific Annex to State EOP	5	13	96	96	Memo

Item B 000153

Index of Administrative File  
Appendix 1

1899	80	CSEPP	Personal Protective Equipment	5	5	96	Memo
1578	80	CSEPP	CSEPP Exercise, May 1, 1996	5	2	96	Memo
1547	80	CSEPP	Chemical Accident/Incident Response Assist...	4	30	96	Report
1897	80	CSEPP	Letter regarding emergency response	4	17	96	Letter
1487	80	CSEPP	April 5, 96 Meeting Report	4	12	96	Report
1694	80	CSEPP	IRZ/PAZ Census Data	2	21	96	Memo
1213	80	CSEPP	Comments on "Appendix M" draft	2	12	96	Letter
1175	80	CSEPP	Reply to January 23-25 CSEPP Mtg	1	30	96	Letter
1043	80	CSEPP	Appendix M to CSEPP Planning Guidance	1	9	96	Letter
1070	80	CSEPP	Response to request for permit denial	1	9	96	Letter
926	80	CSEPP	Director Opposes Incineration	10	1	95	Article
927	80	CSEPP	Response to Recent Inquires	9	26	95	Memo
928	80	CSEPP	Emergency Public Info. Instrctn	9	25	95	Booklet
929	80	CSEPP	Warning you in an Emergency	9	25	95	Flyer
930	80	CSEPP	Status Update on UADA Progress	9	19	95	Letter
931	80	CSEPP	UMDA Mitigation Program	8	26	95	Memo
932	80	CSEPP	CAIRA Plan Support Requirement	8	16	95	Memo
1691	80	CSEPP	Recovery Presentation/Pendleton	7	12	95	Report
933	80	CSEPP	Reentry/Restoration Symposium	5	25	95	Letter
934	80	CSEPP	Reentry/Restoration Symposium	4	24	95	Letter
1214	80	CSEPP	Chemical Accident/Incident response...	4	24	95	Report
935	80	CSEPP	Issue of PPE	4	10	95	Letter
936	80	CSEPP	Symposium on Recovery Issues	4	5	95	Report
937	80	CSEPP	CDCAC Mtg Handouts	4	5	95	Handouts
938	80	CSEPP	Arrangements for Meeting	2	24	95	Letter
939	80	CSEPP	FY 95 Funds	2	23	95	Letter
940	80	CSEPP	Clarification of a Misunderstnd	2	9	95	Letter
941	80	CSEPP	Briefing on issues of Concern	2	7	95	Letter
1689	80	CSEPP	Emergency Response Concept Plan for CSEPP	1	27	95	Report
1688	80	CSEPP	Planning Guidelines for Recov.Phase Act.-CSEPP	11	22	94	Report
	80	CSEPP	CSEPP Library Materials	7	1	94	Biblio
1687	80	CSEPP	Re-entry/Restoration Plan Workbook	6	0	94	Wrkbk
942	80	CSEPP	Updated Schedules	10	18	93	Rise/Fax
	80	CSEPP	Env Monitoring Chem. Welfare Agents	10	11	93	Memo
1658	80	CSEPP	Public Opinion Research	10	0	93	Report
943	80	CSEPP	The Facts	6	7	93	Fctsht/Memo
944	80	CSEPP	The Facts	6	1	93	Fctsht
945	80	CSEPP	The Facts	4	2	93	Fctsht
946	80	CSEPP	The Facts	3	10	93	Fctsht
947	80	CSEPP	Calendar, Emerg. Public Info	0	0	93	Calendar
952	80	CSEPP	Emergency Operations Plan CSEPP Appendices	10	23	90	Report
948	80	CSEPP	Technical Orientation Wrkshop	8	24	90	Agenda
949	80	CSEPP	FY 1990 CSEPP CCA Funding	4	17	90	Tables
953	80	CSEPP	Draft Management Plan for Emerg. Response	7	0	89	Report
954	80	CSEPP	Implementing Procedures for Chem Accdnts	4	0	88	Report
955	80	CSEPP	Implementing Procedures for Chem Accdnts	4	0	88	Report

Index of Administrative File  
Appendix 1

950	80	CSEPP	Record of Decision	2	23	88	Release
956	80	CSEPP	Emergency Response Concept Plan	7	0	87	Report
951	80	CSEPP	Emerg. Prog. Funding Studies	0	0	0	Report
957	80	CSEPP	CSEPP Information Folder	0	0	0	Folder
2077	81	CAIRA Plan & Update	Change 1 to UMCD CAIRA Plan, dated 4/96	7	31	96	Memo
2076	82	CSDP	N. Carolina Protocol for Indirect Exposure RA	8	0	96	Report
958	82	CSDP	CSDP What is it?	1	8	90	Handout
959	82	CSDP	Update, Response Activities	9	18	89	Memo
960	82	CSDP	RCRA Meeting, CSD, Tooele	11	29	88	Agenda
961	82	CSDP	RCRA Part B App. Tooele Depot	11	3	88	Memo
962	82	CSDP	Implementation Plan	3	15	88	Report
963	82	CSDP	Tech Advisory Comite, Membrship	6	5	87	Letter
964	82	CSDP	Chem Stockpile Disposal Study	5	27	87	Letter
965	82	CSDP	CSD Plan Supplement	3	27	87	Letter
1660	82	CSDP	CSDP Draft Programmatic EIS	7	1	86	Report
966	82	CSDP	Umatilla Depot Activity Status	0	0	0	Report
967	82	CSDP	Program Overview	0	0	0	Report
968	82	CSDP	The US Chem Stockpile Dispsl Prog	0	0	0	Handout
2103	85	CDCAC	CDCAC Meetings listed as function for DEQ Rqmn	11	13	96	Letter
2104	85	CDCAC	Clarification of CDCAC Mtg listing for DEQ Rqmn	11	13	96	Letter
2105	85	CDCAC	Meeting Notice, 11/12/96 in Hermiston	11	12	96	Notice
2106	85	CDCAC	Regarding 10 Min. Prsntatn by Karyn Jones	10	24	96	Memo
2107	85	CDCAC	Orientation for New Executives/Brd/Commssn Me	10	10	96	Memo
2108	85	CDCAC	Transmittal of Review & Eval of Alt Tech Rpt	10	10	96	Memo
1905	85	CDCAC	Oct 7, 1996 CDCAC Meeting Notice	10	7	96	Notice
2129	85	CDCAC	Remarks of Dr. R Magee Before CDCAC 10/7/96	10	7	96	Remarks
1904	85	CDCAC	Transmittal of NRC "Review & Eval of Alt Tech"	9	26	96	Memo
2109	85	CDCAC	Memorandum of Understanding	9	23	96	Memo
1811	85	CDCAC	Response to RDaniels letter	8	15	96	Letter
1812	85	CDCAC	Additional response to 6/23/96 JStengle letter	8	8	96	Letter
1801	85	CDCAC	Response to JStengle 6/23/96 letter	7	25	96	Letter
1650	85	CDCAC	Memorandum of Understanding	7	19	96	MOU
1902	85	CDCAC	July 18, 1996 CDCAC Meeting Notice	7	18	96	Notice
1903	85	CDCAC	Alternative Tech Handouts from 7/18/96 meeting	7	18	96	Handouts
1901	85	CDCAC	Transmittal of requested material	7	15	96	Memo
2111	85	CDCAC	Effectiveness of DEQ Staff	7	15	96	Letter
1900	85	CDCAC	Congrats to KJones for re-election as Chair	7	5	96	Letter
1597	85	CDCAC	Letter from JStengle	6	23	95	Letter
1489	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1490	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1491	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1492	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1493	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1494	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1495	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter
1496	85	CDCAC	May 21, 96 meeting notice and agenda	4	19	96	Letter

Index of Administrative File  
Appendix 1

1406	85	CDCAC	CDCAC Roster	3	22	96	Roster
1072	85	CDCAC	FY96 Application for FEMA Funding	2	9	96	Application
969	85	CDCAC	Intent of EQC Meeting	12	21	95	Letter
970	85	CDCAC	EQC Meeting Agenda	12	18	95	Letter/Fax
1041	85	CDCAC	Future Oregon CAC Meetings	12	8	95	Letter
1071	85	CDCAC	Overheads: Overview of Chem Demil Program	11	29	95	Overview
1215	85	CDCAC	Meeting Notice - 11-29-95	11	10	95	Notice
971	85	CDCAC	Ag Impact Assessment Workshop	11	1	95	Letter
972	85	CDCAC	Meeting Notice	9	20	95	Notice
973	85	CDCAC	Storage Issues	8	9	95	Memo
974	85	CDCAC	Meeting Notice CDCAC Good Shepard Community	4	5	95	Notice
975	85	CDCAC	Meeting Notice CDCAC State Office Building	1	23	95	Notice
976	85	CDCAC	Meeting Notice CDCAC Yellowhawk Center	12	14	94	Notice
977	85	CDCAC	Meeting Notice CDCAC Good Shepard Community	10	12	94	Notice
978	85	CDCAC	Meeting Notice CDCAC Good Shepard Community	6	29	94	Notice
979	85	CDCAC	Asses. Final Alt. Tech. Report	4	12	94	Letter
980	85	CDCAC	CDCAC Appointed By Broberts Under Fed Law	8	6	93	Cntrct
981	85	CDCAC	Invite to 1st CSEPP Meeting	8	22	90	Letter
982	85	CDCAC	Automation Workshops	8	22	90	Memo
983	85	CDCAC	Invite to Hearing on Dispostn Chem Agent	3	16	87	Letter
2102	86	FEMA/CDCAC	Cooperative Agreement with LMarsh Sig.	9	26	96	Agreement
1814	86	FEMA/CDCAC	Req. to extend coop agreement performance period	9	19	96	Letter
1813	86	FEMA/CDCAC	Transcription Invoice for CDCAC	7	2	96	Letter
1579	86	FEMA/CDCAC	EMS-96-CA-0037 FY 1996 Cooperative Agreement	5	6	96	Letter
1906	86	FEMA/CDCAC	Cooperative Agreement - FY94	3	29	96	Letter
1074	86	FEMA/CDCAC	Cooperative Agreement Close-out FY94	2	2	96	Letter
1075	86	FEMA/CDCAC	Itemized Expenses Incurred by CDCAC	2	2	96	Report
1176	86	FEMA/CDCAC	Financial Statement Ending 12/31/95	1	20	96	Reports
1907	86	FEMA/CDCAC	Funding for CDCAC	4	10	95	Letter
1254	86	FEMA/CDCAC	Financial Assistance Application	6	3	94	Application
1253	86	FEMA/CDCAC	Invitation to apply for financial assistance	5	13	94	Letter
1073	86	FEMA/CDCAC	Memorandum of Understanding - CDCAC/DEQ	2	16	94	Memo
1917	87	Combustion Risk	JACADS Risk Related Issues	10	2	96	Memo
2085	87	Combustion Risk	Ag Impact Assess Plan for Baseline Study Toel	10	2	96	Report
1916	87	Combustion Risk	Transmittal of Draft Pre-Trial Burn R.A.-UMCDF	9	24	96	Memo
2086	87	Combustion Risk	Greenlaw Preliminary Risk Analysis Incin Prog	9	0	96	Report
1767	87	Combustion Risk	Information from RTI	8	28	96	Report
1603	87	Combustion Risk	Breastmilk Pathway of Concern Pre-Trial Burn R	8	7	96	Memo
2087	87	Combustion Risk	RA Protocol Chem Agent Disposal Facility	7	30	96	Letter
1703	87	Combustion Risk	Met info from Pat Hanrahan	7	11	96	Email
1915	87	Combustion Risk	Transmittal of "US Chem Destr.Program:Views...	7	3	96	Memo
1604	87	Combustion Risk	Comparisons between quan.R.A. & Comp.R.A.	6	26	96	Letter
1605	87	Combustion Risk	Public Participation Record for Screening R.A.	6	20	96	Report
1598	87	Combustion Risk	JACADS Risk Assessment	5	28	96	Report
1914	87	Combustion Risk	Agri. Risk Assessmnt: material & transcript	5	15	96	Report
1913	87	Combustion Risk	Risk Assessment questions - Kalama Chemical in	5	3	96	Memo

Index of Administrative File  
Appendix 1

1498	87	Combustion Risk	Utah DEQ Risk Assessment Overhead	4	15	96	Overheads
1580	87	Combustion Risk	Notice of Intent to Sue (TOCDF)	4	8	96	
1912	87	Combustion Risk	Various comments on Utah Risk Assessment	4	1	96	Comments
2269	87	Combustion Risk	Draft Pre-Trial RA Proposed at Umatilla Chem.	4	0	96	Report
2268	87	Combustion Risk	Draft Pre-Trial RA Proposed at Umatilla Chem.	4	0	96	Report
1651	87	Combustion Risk	Suppl. Risk Assess. Guidance for Superfund-Draft	3	27	96	Report
1497	87	Combustion Risk	Comparative Risk Assessment Option	3	0	96	Report
1911	87	Combustion Risk	Risk Assessment protocol for JACADS	2	28	96	Report
1550	87	Combustion Risk	Review of the ANCDF SRA	2	26	96	Report
827	87	Combustion Risk	Review Draft Pre-Risk Assessment	2	22	96	Report
1179	87	Combustion Risk	Re: Letter dated 11/22/95	2	12	96	Letter
1178	87	Combustion Risk	Parameters Concerning UMAD Pre-trial R.A.	2	9	96	Memo
1412	87	Combustion Risk	Tooele Chem Demil Screening Risk Assessment	2	0	96	Report
1085	87	Combustion Risk	Various ltrs. desc., agendas re crop assessmnt	1	23	96	Letters
1086	87	Combustion Risk	Air-to-leaf Transfer...	1	23	96	Memo
1084	87	Combustion Risk	Notes on "Dec.95 Implementation Guidance"	1	18	96	Notes
1083	87	Combustion Risk	Insertion of Dioxin & Bromoform	1	15	96	Spreadsheet
1081	87	Combustion Risk	Ervosivity and Evapotranspiration Doc.	1	14	96	Memo
1082	87	Combustion Risk	Surface water flows	1	14	96	Memo
1255	87	Combustion Risk	Clarification of Erosivity	1	12	96	FAX
1079	87	Combustion Risk	Watersheds	1	11	96	Email
1080	87	Combustion Risk	WTI Risk Assessment Peer Review Meeting	1	11	96	Notes
1078	87	Combustion Risk	Response to Risk Assessment Wkplan comments	1	9	96	Letter
1411	87	Combustion Risk	Crop Health Risk Assessment	12	12	95	Report
984	87	Combustion Risk	WTI Workshop	11	30	95	FederlReg
1413	87	Combustion Risk	Final Screening Risk Assessment - Anniston,AL	11	30	95	Report
1414	87	Combustion Risk	Final Screening Risk Assessment - Anniston,AL	11	30	95	Report
1415	87	Combustion Risk	Final Screening Risk Assessment - Anniston,AL	11	30	95	Report
1416	87	Combustion Risk	Final Screening Risk Assessment - Anniston,AL	11	30	95	Report
1417	87	Combustion Risk	Final Screening Risk Assessment - Anniston,AL	11	30	95	Report
1177	87	Combustion Risk	Comment on Pre-Trial Burn Risk Work Plan	11	27	95	Letter
1076	87	Combustion Risk	Comments on Risk Assessment Workplan	11	22	95	Comments
986	87	Combustion Risk	Meeting Notice Open Forum	11	2	95	Notice
2088	87	Combustion Risk	Request for Columbia Basin GIS Data	11	1	95	Letter
1606	87	Combustion Risk	Risk Ass. for Waste Tech Ind. HazWaste Facilit	11	0	95	Report
985	87	Combustion Risk	JACADS meeting W/ Public	10	30	95	Memo
1154	87	Combustion Risk	UMDA Meteorological Data Comparison	5	3	95	Letter
1910	87	Combustion Risk	Study to determine if off-site meteorological.	4	3	95	Report
1047	87	Combustion Risk	Revised Meteorological Monitoring Plan	2	28	95	Ltr/Rpt
1840	87	Combustion Risk	Health Risk Assessment Protocol for ANCDF	1	19	95	Report
872	87	Combustion Risk	Determination of Acute Toxicity Exp Lvlis	1	0	95	Report
1909	87	Combustion Risk	Suppl. guidance for Ecologic Risk Assessments	10	14	94	Report
2089	87	Combustion Risk	Representative Hanford Radiation Dose Estimate	5	21	94	Pamphlet
2306	87	Combustion Risk	Exposure Assessment Guidance for RCRA HW	4	0	94	Report
1908	87	Combustion Risk	Guidance for upset conditions, Appendix E-1	8	0	90	Report
2323	87	Combustion Risk	Methodology for Assessing Health Risks	1	0	90	Report

Index of Administrative File  
Appendix 1

88	Various Dioxin Info	Note: Indvdl Docs Do Not have Admin #	11	5	91	Graph
1002	90 Old Part B	Furnace Scope of Work	11	5	91	Graph
1003	90 Old Part B	Burnout and Removal of Deactivatn Furnance	9	30	91	Memo
1004	90 Old Part B	Progress Update Interim Remediatn Actn	7	26	91	Memo
987	90 Old Part B	RCRA Application	8	0	90	Applictn
988	90 Old Part B	RCRA Application	8	0	90	Applictn
989	90 Old Part B	RCRA Application	8	0	90	Applictn
990	90 Old Part B	RCRA Application	8	0	90	Applictn
991	90 Old Part B	RCRA Application	8	0	90	Applictn
992	90 Old Part B	RCRA Application	8	0	90	Applictn
993	90 Old Part B	RCRA Application	8	0	90	Applictn
994	90 Old Part B	RCRA Application	8	0	90	Applictn
995	90 Old Part B	RCRA Application	8	0	90	Applictn
996	90 Old Part B	RCRA Application	8	0	90	Applictn
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998	90 Old Part B	RCRA Application	8	0	90	Applictn
999	90 Old Part B	RCRA Application	8	0	90	Applictn
1000	90 Old Part B	RCRA Application	8	0	90	Applictn
1001	90 Old Part B	RCRA Application	8	0	90	Applictn
1005	90 Old Part B	Response to Phone conversation	7	26	90	Fax
1006	90 Old Part B	Deactivatn Furnace, Closure Plan	11	15	89	Letter
1007	90 Old Part B	Installation Spill Contingency Plan	5	18	89	Rvsd Pages
1008	90 Old Part B	OE/OD Brning, Brn Trays, Land	2	22	89	Letter
1009	90 Old Part B	CSD, Subseqnt Cmmts to Dec.8 88	12	14	88	Letter
1010	90 Old Part B	RCRA Part B App For Tooele CSDS Comments	12	8	88	Letter
1017	90 Old Part B	RCRA Support Documents	9	0	87	Report
1011	90 Old Part B	CSDP	7	24	87	Table
1018	90 Old Part B	RCRA HW Permit Application	5	29	87	Report
1661	90 Old Part B	RCRA Hazardous Waste Permit Application	5	0	87	Report
1662	90 Old Part B	RCRA Hazardous Waste Permit Application	5	0	87	Report
1663	90 Old Part B	RCRA Hazardous Waste Permit Application	5	0	87	Report
1664	90 Old Part B	RCRA Hazardous Waste Permit Application	5	0	87	Report
1665	90 Old Part B	RCRA Hazardous Waste Permit Application	5	0	87	Report
1012	90 Old Part B	RCRA Part B Permit Review	11	6	86	Memo
1013	90 Old Part B	Review of Documents on Chemical Agents	11	6	86	Memo
1014	90 Old Part B	Supplement to RCRA Part B App	10	20	86	Letter
1019	90 Old Part B	RCRA HW Permit Application	9	15	86	Report
1020	90 Old Part B	RCRA HW Permit Application	9	15	86	Report
1021	90 Old Part B	RCRA HW Permit Application	9	15	86	Report
1022	90 Old Part B	RCRA HW Permit Application	9	15	86	Report
1656	90 Old Part B	RCRA Hazardous Waste Permit Application	9	0	86	Report
1657	90 Old Part B	RCRA Hazardous Waste Permit Application	9	0	86	Report
1015	90 Old Part B	Inspection, Closure, Contingency Plan	0	0	0	Memo
1016	90 Old Part B	Part B App. Nerve Agent Incinerator	0	0	0	Letter
2257	92 EQC Documents	Tape 1, Sides 1 & 4, EQC in Pendleton	11	22	96	Cassette
2258	92 EQC Documents	Tape 2, Side 6,2, and 5, EQC in Pendleton	11	22	96	Cassette

Index of Administrative File  
Appendix 1

2259	92	EQC Documents	Tape 3, Side 3, EQC in Pendleton	11	22	96	Cassette
2044	92	EQC Documents	DEQ Directors Recommendations to EQC on BAT	11	22	96	Fax
2045	92	EQC Documents	Proposed Prmt Conditions from Commission Mtgs	11	22	96	Attach B
2046	92	EQC Documents	Dept. Recommended Permit Cndtns from Commn Mt	11	22	96	Cndtn
2047	92	EQC Documents	Qstns about proposed UMCDF	11	21	96	Memo
2050	92	EQC Documents	Transmittal of Public Comments	11	18	96	Memo
2048	92	EQC Documents	Concerns regarding Emergency Preparedness Issu	11	15	96	Letter
2146	92	EQC Documents	Tape 1, Side 1 and Side 3	11	15	96	Cassette
2147	92	EQC Documents	Tape 2, Side 2 and Side 4	11	15	96	Cassette
2148	92	EQC Documents	Tape 3,	11	15	96	Cassette
2049	92	EQC Documents	Response to Umatilla Documents for 11/15/96	11	14	96	Memo
2051	92	EQC Documents	EQC Meeting 11/14-15/96 in Portland	11	14	96	Agenda
2149	92	EQC Documents	Tape 3	11	14	96	Cassette
2150	92	EQC Documents	Tape 2, Side 2 and Side 4	11	14	96	Cassette
2151	92	EQC Documents	Tape 1, Side 1 and Side 3	11	14	96	Cassette
2055	92	EQC Documents	Transmittal of Umatilla Doc in Prep for 11/15/	11	6	96	Cassette
2056	92	EQC Documents	Best Available Technology Finding	11	5	96	Memo
2057	92	EQC Documents	Notice to Persons Interested in Proposed Incin	11	0	96	Notice
2072	92	EQC Documents	Copy of OSU Dioxin Paper	10	31	96	Memo
2058	92	EQC Documents	Rpt to Questions on Dioxin Formation at UMCDF	10	29	96	Report
2062	92	EQC Documents	EQC Work Session 9-27-96	10	27	96	Minutes
2053	92	EQC Documents	EQC Meeting 11/22/96 in Pendleton	10	24	96	Agenda
2052	92	EQC Documents	EQC Meeting 11/22/96 in Pendleton	10	23	96	Agenda
2054	92	EQC Documents	EQC Meeting 11/14-15/96 in Portland	10	23	96	Agenda
2059	92	EQC Documents	EQC Minutes 10/11/96 Regular Meeting	10	11	96	Minutes
2060	92	EQC Documents	Handout for 10-11-96 EQC Meeting	10	11	96	Handout
2157	92	EQC Documents	EQC Meeting, Umatilla Portion	10	11	96	Cassette
1825	92	EQC Documents	EQC Meeting Agenda for 10/10-11/1996	10	10	96	Agenda
2061	92	EQC Documents	EQC Work Session 10-10-96	10	10	96	Minutes
2137	92	EQC Documents	Side 6 and Side 8	9	27	96	Cassette
2138	92	EQC Documents	Side 5 and Side 7	9	27	96	Cassette
1822	92	EQC Documents	EQC Meeting Agenda for 9/27/96	9	27	96	Agenda
1823	92	EQC Documents	Discussion of proposed permit condition-UMCDF	9	27	96	Report
1824	92	EQC Documents	Discussion of ORS466.055 Findings	9	27	96	Report
2063	92	EQC Documents	Discussion of ORS 466.055b Findings	9	27	96	Memo
2071	92	EQC Documents	Executive Summary from the NRC report on AltTe	9	25	96	Memo
1821	92	EQC Documents	Response to Hlorenzen's 9/5/96 letter	9	17	96	Letter
2064	92	EQC Documents	EQC 9-27-96 Meeting in Portland	9	13	96	Agenda
2070	92	EQC Documents	November EQC Meeting	9	13	96	Memo
1820	92	EQC Documents	EQC Worksession 9/27/96 list of goals	9	12	96	Memo
1775	92	EQC Documents	Leak incident at Tooele, Utah	9	10	96	Report
1774	92	EQC Documents	Public survey and public info activities	8	31	96	Memo
1769	92	EQC Documents	Agenda Item H, EQC Meeting 8/23/96 BAT	8	28	96	Letter
1768	92	EQC Documents	UMCDF OEM Presentation to EQC	8	27	96	Letter
1819	92	EQC Documents	EQC Meeting notes from 8/22/96	8	27	96	Notes
21139	92	EQC Documents	Tape 1, EQC Meeting	8	23	96	Cassette

Item B 000159



Index of Administrative File  
Appendix 1

2140	92	EQC Documents	Tape 2, EQC Meeting	8	23	96	Cassette
2141	92	EQC Documents	Tape 3, EQC Meeting	8	23	96	Cassette
1706	92	EQC Documents	EQC Meeting Agenda for 8/22-23/96	8	22	96	Notice
1930	92	EQC Documents	Written Testimony from KJones 8/22/96	8	22	96	Reports
1931	92	EQC Documents	Letter from Rep.Chuck Norris	8	22	96	Letter
2144	92	EQC Documents	Tape 1, EQC Meeting, Afternoon Session	8	22	96	Cassette
2145	92	EQC Documents	Tape 2, EQC Meeting, Afternoon Session	8	22	96	Cassette
2142	92	EQC Documents	Tape 1, EQC Meeting, Evening Session	8	22	96	Cassette
2143	92	EQC Documents	Tape 2, EQC Meeting, Evening Session	8	22	96	Cassette
1929	92	EQC Documents	DWysocki unable to attend August EQC meeting	8	13	96	Letter
1772	92	EQC Documents	Request for attendance to 8/22/96 EQC Mtg	8	8	96	Letter
1928	92	EQC Documents	UAD items for 8/22-23/96 EQC Meeting	8	8	96	Memo
1704	92	EQC Documents	Transmittal of additional info on UMCDF	8	7	96	Memo
1705	92	EQC Documents	Transmittal of info for EQC Meeting 8/22-23/96	8	7	96	Fax
1817	92	EQC Documents	EQC 7/11/96 worksession R.A.response issues	7	11	96	Report
1818	92	EQC Documents	Chemical Demil Program presentation: for 7/11/9	7	11	96	Report
1927	92	EQC Documents	Transmittal of "US Chem Destr.Program:Views...	7	3	96	Memo
1802	92	EQC Documents	Transmittal of Documents to EQC	7	2	96	Memo
1801	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1800	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1599	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1815	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1826	92	EQC Documents	EQC Meeting Agenda for 6/11-12/96	6	27	96	Agenda
1852	92	EQC Documents	Interagency Agreement - DEQ & OSU	6	25	96	Agreement
1825	92	EQC Documents	Response to James Quigley 5/30/96 letter	6	24	96	Letter
1551	92	EQC Documents	Ltr to JHaley w/MHarrison Testimony to EQC	5	31	96	Letter
1552	92	EQC Documents	Ltr to JGorrell requesting additional info	5	31	96	Letter
1553	92	EQC Documents	May 17 Umatilla Discussion list of speakers	5	17	96	Memo
1926	92	EQC Documents	Karyn Jones' Written Testimony for 5/17/96 EQC	5	17	96	Reports
2065	92	EQC Documents	Status of Emergency Response	5	17	96	Prsntation
2066	92	EQC Documents	Material Submitted by Karyn Jones	5	17	96	Report
2067	92	EQC Documents	Comments of Destruction of Chem Weapons at UAD	5	17	96	Cmnts
1513	92	EQC Documents	EQC Worksession Agenda 5/16/96	5	16	96	Agenda
1583	92	EQC Documents	EQC Meeting Agenda for 5/16-17/96	5	16	96	Agenda
1584	92	EQC Documents	Air Quality Permit Overview for 5/16/96 EQC	5	16	96	Overheads
1925	92	EQC Documents	EQC Worksession air presentation 5/16/96	5	16	96	Overheads
2135	92	EQC Documents	EQC Work Session Potential Alt. to Incin	5	16	96	Video
2136	92	EQC Documents	EQC Work Session Potential Alt. to Incin	5	16	96	Video
2152	92	EQC Documents	EQC Work Session, Tape 1	5	16	96	Cassette
2153	92	EQC Documents	EQC Work Session, Tape 2	5	16	96	Cassette
2154	92	EQC Documents	EQC Work Session, Tape 3	5	16	96	Cassette
2155	92	EQC Documents	EQC Work Session, Tape 4	5	16	96	Cassette
2156	92	EQC Documents	EQC Work Session, Tape 5	5	16	96	Cassette
2068	92	EQC Documents	Umatilla Chemical Weapons Destruction Permits	5	7	96	Letter
1924	92	EQC Documents	Transmittal of Alternative Technologies Info	5	3	96	Memo
2264	92	EQC Documents	Handout to EQC from Brett McKnight, DEQ	5	0	96	Binder

Index of Administrative File  
Appendix 1

2069	92	EQC Documents	Delay Granting of the Army's Permit	4	30	96	Letter
1919	92	EQC Documents	Minutes for 4/12/96 EQC Meeting	4	22	96	Minutes
1512	92	EQC Documents	Letter to Mick Harrison	4	19	96	Letter
1592	92	EQC Documents	Response to OEC ltr dated 4/9/96 by JCharles	4	18	96	Memo
1920	92	EQC Documents	Emergency Update for 5/17/96 EQC Meeting	4	18	96	Letter
1921	92	EQC Documents	Emergency Update for 5/17/96 EQC Meeting	4	18	96	Letter
1922	92	EQC Documents	Emergency Update for 5/17/96 EQC Meeting	4	18	96	Letter
1923	92	EQC Documents	Participation in Alts to Incin. discussion	4	18	96	Letter
1302	92	EQC Documents	HW Permit Presentation - Overheads	4	12	96	Overheads
1501	92	EQC Documents	Confirmation of Attendance to May 16 mtg	4	10	96	Letter
1500	92	EQC Documents	Letter from John Charles re: EQC Decisions	4	9	96	Letter
1918	92	EQC Documents	Unatilla Chemical Weapons Incinerators	3	15	96	Memo
1581	92	EQC Documents	Minutes of the 250th Meeting	2	23	96	Minutes
1216	92	EQC Documents	Presentation to the EQC	2	9	96	Letter
1217	92	EQC Documents	Presentation to the EQC	2	6	96	Letter
1042	92	EQC Documents	Provide Comments; Video	12	26	95	Letter
1032	92	EQC Documents	Adoption of Rules Chapter 340	4	25	86	Memo
2114	94	Meeting Notes	Natl Chem Agent Demil Wrkgrp Mtg	11	14	96	Memo
2112	94	Meeting Notes	Next Scheduled Teleconference 10/17/96	10	9	96	Fax
1937	94	Meeting Notes	Papers from Env.Forum II-Salt Lake, UT 10/3/96	10	3	96	Papers
1936	94	Meeting Notes	Agenda-Workgroup Teleconference 10/7/96	9	24	96	Fax
1935	94	Meeting Notes	Exec summary of Env.Forum Denver, CO 7/10/96	9	23	96	Transcripts
2113	94	Meeting Notes	Chem Agent Demil Wrkgrp Conference Call Summar	8	13	96	Summary
1837	94	Meeting Notes	Chem Demil Forum - Denver 7/10/96	7	10	96	Notes
1836	94	Meeting Notes	Chem.Demil.Wkgrp - Conf.Call Summary - 6/11/96	6	11	96	Summary
1554	94	Meeting Notes	Chem Demil Conf. Call agenda for 6/11/96	6	5	96	Agenda
1934	94	Meeting Notes	Agenda-munitions rule conf call/mtg 5/29/96	5	20	96	Agenda
1503	94	Meeting Notes	Dioxin and Health Truth or Consequences	4	13	96	Flyer
1933	94	Meeting Notes	Dioxin Conference - 4/13/96	4	13	96	Papers
1504	94	Meeting Notes	Chem Demil Workgroup Conference Call	4	8	96	Memo
1226	94	Meeting Notes	Teleconference w/Army re:Various Issues	3	6	96	Agenda
1225	94	Meeting Notes	Notice for March 8,96 Teleconference	3	4	96	Notice
1224	94	Meeting Notes	Sequester Risk Assessment Mtg, Feb 27-29,96	2	27	96	Agenda
1223	94	Meeting Notes	Summary Feb 13,96 Teleconference	2	21	96	Summary
1190	94	Meeting Notes	Perimeter Monitoring Conference Call	2	15	96	Agenda
1222	94	Meeting Notes	Agenda Feb 15,96 Teleconference	2	15	96	Agenda
1555	94	Meeting Notes	Chem Demil 2/13/96 Conf call summary	2	13	96	Notes
1089	94	Meeting Notes	Unatilla status Teleconference	2	8	96	Agenda
2318	94	Meeting Notes	12/12/95 CAD Conference Call Summary	1	24	96	Memo
1086	94	Meeting Notes	Army Quarterly Meeting	12	13	95	Agenda
1272	94	Meeting Notes	EQC Meeting at Headquarters	12	13	95	Agenda
1221	94	Meeting Notes	Summary Dec 12,95 Teleconference	12	12	95	Summary
1220	94	Meeting Notes	Notes Nov 7,95 Pentagon Mtg	11	21	95	Summary
1219	94	Meeting Notes	Summary Aug 15-16,95 Quarterly Mtg Army/DEQ	11	15	95	Summary
1218	94	Meeting Notes	Summary Oct 25,95 Teleconference	11	13	95	Letter
1273	94	Meeting Notes	Teleconferences, Risk Assess.	11	8	95	Agendas

Item B 000161

Index of Administrative File  
Appendix 1

1407	94 Meeting Notes	Minutes from CTUIR meeting Nov.1,1995	11	1	95 Minutes
1274	94 Meeting Notes	Meeting Notes	10	25	95 Memo
2281	94 Meeting Notes	Briefing Book	10	25	95 Binder
1275	94 Meeting Notes	Witness Testimony Open Statmnt	10	12	95 Statmnt
1181	94 Meeting Notes	Agenda - DEQ/Army Quarterly Mtg 8/15-16/95	8	15	95 Agenda
1690	94 Meeting Notes	Meeting with DOH-5/26/95	5	26	95 Notes
1276	94 Meeting Notes	DEQ/Army Quarterly Meeting Minutes 5/24/95	5	24	95 Minutes
1277	94 Meeting Notes	Conference Call, ANCDF Permit App	4	21	95 Summary
1408	94 Meeting Notes	Comments on Draft Meeting Notes of 2/28/95	4	11	95 Notes
1087	94 Meeting Notes	Meeting Minutes - CSEPP/DEQ	3	28	95 Minutes
1932	94 Meeting Notes	Minutes-DEQ/Emerg.Management Meeting 3/28/95	3	28	95 Minutes
1180	94 Meeting Notes	Quarterly Mtg with Army/EPA/DEQ 3/21-22/95	3	22	95 Minutes
1278	94 Meeting Notes	Meteorological Data	3	21	95 Hndout
	94 Meeting Notes	Meeting Notice	1	23	95 Notice
	94 Meeting Notes	Meeting Notice	12	14	94 Notice
1279	94 Meeting Notes	Open House-Meeting Notice	11	16	94 Notice
1280	94 Meeting Notes	UMCDF Air Permit Application	11	2	94 Notes
1152	94 Meeting Notes	Quarterly Mtg Notes/Aug2-3,1994/Final	10	20	94 Notes
1151	94 Meeting Notes	EPA-US ARMY Meeting in DC	10	18	94 List/Nts
	94 Meeting Notes	CDCAC Meeting Notice	10	12	94 Notice
1150	94 Meeting Notes	Quarterly Mtg Notes/Aug2-3,1994/Draft	9	23	94 Notes
1149	94 Meeting Notes	ANAD Chem Demil Meeting	8	17	94 List/Nts
1146	94 Meeting Notes	Risk Assessment Roster	8	16	94 List
1147	94 Meeting Notes	Review Comments on ANAD Chem Demil Draft R.A.	8	5	94 Notes
1145	94 Meeting Notes	USACMDA Chem Demil Mtg Notice	7	26	94 Notice
1144	94 Meeting Notes	Chem Demil Mtg Summary Draft - 4/12-13/94	7	18	94 Notes
1143	94 Meeting Notes	Risk Assessmnt Mtg Summary Draft - 6/21-23/94	7	18	94 Notes
1142	94 Meeting Notes	CDCAC Meeting Notice	6	29	94 Notice
	94 Meeting Notes	CDCAC Meeting Notice	6	1	94 Notice
	94 Meeting Notes	CDCAC Meeting Notice	5	17	94 Notice
	94 Meeting Notes	Hearing on Alternative Technologies	5	3	94 Memo
1141	94 Meeting Notes	UMDA Denver Demil Meeting	4	12	94 Handouts
2115	94 Meeting Notes	Public Information Materials for CSDP Requeste	9	30	93 Letter
1140	94 Meeting Notes	Alternative Technologies Forum Draft Agenda	6	30	93 Agenda
1139	94 Meeting Notes	Final Meeting Notes from 12/9-11/92 Meeting	4	13	93 Minutes
1138	94 Meeting Notes	Draft Meeting Notes from 12/9-11/92 Meeting	1	15	93 Minutes
1137	94 Meeting Notes	Chem Demil Conference Call 10/21/92	10	21	92 Attachments
1136	94 Meeting Notes	USACMDA & Nerve Agent Wkgrp list	9	29	92 List
1135	94 Meeting Notes	Agenda Chem Demil Conference Call- 10/21/92	9	24	92 Agenda
1134	94 Meeting Notes	Tech Orientation Wkshp Attendance Roster	9	5	90 List
1133	94 Meeting Notes	Notes from Cathy Massimino 6/8/90	6	8	90 Notes
1132	94 Meeting Notes	Agenda-Intergovern.consultation & coordination	4	10	90 Agenda
1131	94 Meeting Notes	Umatilla Sign in Sheet 10/18-19/89	10	18	89 List
1130	94 Meeting Notes	ICCB Meeting - 8/17/87	8	18	89 Notes
1129	94 Meeting Notes	IAG Meeting 6/6/89 Portland - Roster	6	6	89 List
1127	94 Meeting Notes	Agenda - for IAG meeting 5/18/89	5	18	89 Notes

Index of Administrative File  
Appendix 1

1128	94 Meeting Notes	DEQ/EPA/Army IAG Meeting Roster - 5/18/89	5	18	89 Agenda
1126	94 Meeting Notes	RCRA Corrective Action Order Wkshp - 2/22-23/8	2	22	89 Agenda
1125	94 Meeting Notes	Proposed schedule site specific NEPA Documents	1	3	89 Schedule
1123	94 Meeting Notes	Tooele Incinerator Project meeting - 11/28/88	11	28	88 Notes
1122	94 Meeting Notes	Results of Steering Committee Meeting-10/26/88	11	16	88 Memo
1124	94 Meeting Notes	Intergov Consultation & Coordination Board	11	15	88 List
1120	94 Meeting Notes	Emerg Response Steering Committee Mtg Attendee	11	3	88 List
1121	94 Meeting Notes	Review Team Members Roster	11	3	88 List
1117	94 Meeting Notes	Chem Demil Meeting Minutes 2/88	5	5	88 Minutes
1119	94 Meeting Notes	Minutes from meeting in Pasadena 11/12-13/87	1	21	88 Minutes
1116	94 Meeting Notes	On-Site Inspectors for monitoring compliance	12	15	87 Memo
1118	94 Meeting Notes	Notes from UAD Conference Call - 12/87	12	0	87 Notes
1115	94 Meeting Notes	24hr On-Site Inspection/Computer Link-Up	11	18	87 Letter
1114	94 Meeting Notes	Highlights from 11/12-13/87 RCRA/Army Mtg	11	0	87 Summary
1113	94 Meeting Notes	Meeting w/Army 11/12-13-97	10	16	87 Memo
1111	94 Meeting Notes	Interim report based on plant visit/RCRA Revie	9	25	87 Report
1110	94 Meeting Notes	Notice re: Mtg.on Long-Term Low-Dose Exposure	9	3	87 FedReg
1112	94 Meeting Notes	Briefing outlines submitted to Army 9/1/87	9	2	87 Letter
1109	94 Meeting Notes	UAD RCRA facility investigation-draft workplan	5	19	87 Letter
1108	94 Meeting Notes	Minutes from 3/87 meetings with Army	5	6	87 Minutes
1107	94 Meeting Notes	Attendees at Mtg W/EPA SWMU at Umatilla 5/5/87	5	5	87 List
1106	94 Meeting Notes	Draft Minutes of 3/87 meetings in Aberdeen	4	14	87 Memo
1104	94 Meeting Notes	Meeting notes from 5/25/87 - Chem Demil wrkgrp	3	25	87 Notes
1105	94 Meeting Notes	Attendees at 3/25/87 EPA State Meeting	3	25	87 List
1103	94 Meeting Notes	Conference call agenda for 2/5/87	2	5	87 Memo
1102	94 Meeting Notes	UAD Conference Call Notes	0	0	87 Notes
1101	94 Meeting Notes	Agenda, Chem Demil RCRA App. Mtg 9/25-26/86	9	9	86 Memo
1100	94 Meeting Notes	Attendees for 8/29/86 Chem Demil Mtg	8	29	86 List
1099	94 Meeting Notes	Agenda, Chem Demil RCRA App Mtg 8/29/86	8	18	86 Memo
1098	94 Meeting Notes	Notes from 5/13-14/86 DOA-EPA Mtg	7	17	86 Notes
1097	94 Meeting Notes	Schedule of conference calls - Chem Demil wkgr	7	11	86 Memo
1096	94 Meeting Notes	Installation Points of Contact for Chem Demil	5	29	86 Memo
1095	94 Meeting Notes	Report on 5/13-14/86 EPA/DA Meeting	5	13	86 Report
1094	94 Meeting Notes	National Meeting EPA/DOD Task Force 5/13-14/86	5	6	86 Memo
1091	94 Meeting Notes	Directions to Aberdeen Proving Grounds	0	0	0 Map
1092	94 Meeting Notes	Meeting Attendees Fed & State	0	0	0 List
1093	94 Meeting Notes	Notes	0	0	0 Notes
1499	95 Guidance Documents	Guidance for Total Organics	3	1	96 Report
1227	95 Guidance Documents	EPA Region 10-Suppl.Risk Assess.Superfund	2	0	96 Document
1230	95 Guidance Documents	Guidance for Total Organics - Final Draft Rpt	1	26	96 Report
2272	95 Guidance Documents	User's Guide for the Industrial Source Complex	7	19	95 Binder
	95 Guidance Documents	Pre-Proposed Munitions Rule	6	21	95 Lette
1557	95 Guidance Documents	Wkshp on Assessing Risks from...	3	22	95 Workbook
	95 Guidance Documents	Civil Admin. Enforcment Action	3	13	95 Action
429	95 Guidance Documents	Draft Protocol-Anniston	2	6	95 Report
1292	95 Guidance Documents	Tooele Safety Issues	1	17	95 Report

Item B 000163

Index of Administrative File  
Appendix 1

1291	95	Guidance Documents	CMA/EPA BIF Wrkshop	1	0	95	Trnsript
	95	Guidance Documents	4068.Mgmt Standards for HW	11	14	94	Rule
1290	95	Guidance Documents	Meteorological Monitoring Plan	7	29	94	Report
	95	Guidance Documents	Alternative Technologies /Army	4	1	94	Flyer
1653	95	Guidance Documents	Addendum to Methodology for Assessing Health R	11	10	93	Report
	95	Guidance Documents	Federal Register/Proposed Rule	10	25	93	Fed Reg
	95	Guidance Documents	Federal Register/Proposed Rule	10	20	93	Fed Reg
	95	Guidance Documents	Public Opinion Survey	10	1	93	Report
1289	95	Guidance Documents	Hightst Best Trtmnt Required	9	24	93	Rules
	95	Guidance Documents	Proposed Nerve Agent Inc Proc	10	6	92	Report
	95	Guidance Documents	Fed Fac Compliance Act	0	0	92	Regs.
	95	Guidance Documents	Chemical Weapons Disposal	11	10	91	Report
	95	Guidance Documents	HW Incinerator Proposed Contrl	3	1	90	Report
	95	Guidance Documents	HW Incinerator Proposed Contrl	3	1	90	Report
1289	95	Guidance Documents	Wkshp Review RCRA Trial Burn	5	9	89	Report
1287	95	Guidance Documents	PIC Control for HW Incinerator	4	1	89	Report
	95	Guidance Documents	HW Incineration Measurement	3	28	89	Report
1286	95	Guidance Documents	Trial Burn Observation Guide	3	1	89	Report
1285	95	Guidance Documents	Reviewing Trial Burn Reports	2	10	89	Report
1284	95	Guidance Documents	Permit Conditions & Trial Burn	1	1	89	Report
1282	95	Guidance Documents	HW Incinerator Inspection Man.	1	1	89	Report
1283	95	Guidance Documents	CO Control HW Incinerator	9	9	88	Report
1296	95	Guidance Documents	Emer Resp Prog Guidance/Final	11	30	87	Report
1419	95	Guidance Documents	M P F Heating Curve	10	1	87	Misc
	95	Guidance Documents	HW Incinerator Permits	7	1	83	Report
1295	95	Guidance Documents	Metals Partitioning	0	0	0	Report
1281	95	Guidance Documents	Safely Destroying Chem Weap	0	0	0	Brochure
1293	95	Guidance Documents	Permit Denial Appeals, DA sig.	0	0	0	Report
1294	95	Guidance Documents	Pre-Proposed Munitions Rule	9	12	95	Email
1307	96	Regulations	Draft Military Munitions	6	21	95	Letter
1306	96	Regulations	Redraft of Mltry Mntns Rule	5	25	95	Letter
1305	96	Regulations	Utah Administrative Code	5	18	95	Letter
1304	96	Regulations	Highest & Best Treatment	1	5	95	Report
1303	96	Regulations	Chemical Destruction Program	11	26	94	OAR
1302	96	Regulations	Fed Reg. Dspcl Chem Agents	0	0	93	Regs
1301	96	Regulations	House Bill No. 465	3	3	92	Notice
842	96	Regulations	Reopening of Public Comment Prd	2	26	92	Bill
1300	96	Regulations	Federal Facility Compliance	2	26	92	Fed. Reg.
843	96	Regulations	Amendmnt to Owners & Operators	1	3	92	Act
1299	96	Regulations	Amendment to Owners & Operators	4	24	90	Letter
1297	96	Regulations	Amendment to Owners & Operators	4	13	90	Letter
1298	96	Regulations	Long- Term Exposure to GA, GB	12	22	87	Fed Reg
871	96	Regulations	Federal Register re: RCRA BDAT	11	7	86	Federal Reg
1839	96	Regulations	Intent to Prepare EIS	4	9	85	Fed Reg
877	96	Regulations	Applicability of the NEPA to RCRA	5	22	79	Memo
1182	96	Regulations	Various Vendor Info				
	98		Note: Indvdl Documents Do Not Have Admin #				

Index of Administrative File  
Appendix 1

2094	99 Misc - Demil	Petitioners 1st set of Doc Prod Rqst to UDEQ	10	29	96	Letter
1939	99 Misc - Demil	Greenlaw Suit in Utah re: TOCDF	8	8	96	Findings
1938	99 Misc - Demil	Greenlaw Notice of Intent to Sue TOCDF	6	28	96	Notice
1627	99 Misc - Demil	Affidavit of Steve Jones	6	3	96	Affidavit
1556	99 Misc - Demil	Greenlaw Suit in Utah	5	28	96	Report
1816	99 Misc - Demil	Greenlaw Utah Complaint	5	1	96	Complaint
2092	99 Misc - Demil	State & Tribal Forum on Risk-Based Decsn	10	16	95	Annmnt
1183	99 Misc - Demil	Environment Arkansas:BBS	9	27	95	FileListing
1184	99 Misc - Demil	Survey of Opinions and Behaviors	9	5	95	Letter
1364	99 Misc - Demil	Hermiston Office Activities Report #2	8	8	95	Memo
1363	99 Misc - Demil	Umatilla Project Activities	8	8	95	Memo
1361	99 Misc - Demil	Citizens Advisory Meeting	8	2	95	Agenda
1362	99 Misc - Demil	Military Procurement Subcommittee Hearing 7/13/9	7	13	95	Report
1365	99 Misc - Demil	John Nunn, CDCAC	7	13	95	Testmny
1360	99 Misc - Demil	Publ Ntce Johnston Atoll Chem.	6	28	95	Notice
1366	99 Misc - Demil	Proposed Rule Stage - #4068	11	14	94	FedReg
1359	99 Misc - Demil	Disp of Chem Agents & Munition	5	26	94	Present
1358	99 Misc - Demil	Hearing on Alt. Tech.	5	3	94	Memo
1357	99 Misc - Demil	Proposed Rule Stage - #3746	10	25	93	FedReg
1356	99 Misc - Demil	PartII Risk Mngmt for Accidental Release	10	20	93	FedReg
2131	99 Misc - Demil	DOD Authorization Act	2	2	93	Act
19	99 Misc - Demil	CSDP Schedule	12	10	92	Schedule
1355	99 Misc - Demil	Proposed Umatilla Nerve Agent Incin Process	10	6	92	Process
2130	99 Misc - Demil	Facility Management Plan	3	0	92	Plan
1354	99 Misc - Demil	House Bill No. 465	2	26	92	Bill
1353	99 Misc - Demil	Internatl Citizens Accord on Chem Weapons Disps	11	10	91	Mtg Notes
1344	99 Misc - Demil	Pgrss Updte Interm Remdtn Actn	7	23	91	Memo
1343	99 Misc - Demil	A/E Support in Doc. Preparatn	1	2	91	Memo
1342	99 Misc - Demil	GAO Report	10	3	90	Letter
1341	99 Misc - Demil	Automation Workshops	9	21	90	Letter
1340	99 Misc - Demil	DEQ Mts Army Env Branch Part B	8	24	90	Memo
1339	99 Misc - Demil	Visit to JACADs, Shkdw Opertn	8	14	90	Report
1338	99 Misc - Demil	RGIs Changed, One RSM	6	29	90	Letter
2322	99 Misc - Demil	US & Soviet Agrmnt Chem Weapons	6	6	90	Letter
1337	99 Misc - Demil	DOD Draft Tstmny Stockple	4	3	90	Memo
1336	99 Misc - Demil	Programs schedules Revision 2	3	0	90	Scheduls
23	99 Misc - Demil	Hazardous Waste Facility Permit Fee	11	2	89	Memo
1335	99 Misc - Demil	Proposed Decision to Deny Prmt	8	30	89	Letter
1334	99 Misc - Demil	Popping Furnace Admin Record	8	29	89	Chart
1333	99 Misc - Demil	Popping Furnace Administrative Record	8	29	89	Chart
1332	99 Misc - Demil	Issuance of RCRA Permit Furnce	7	19	89	Letter
1331	99 Misc - Demil	CSDP Dsgn & Opertn	1	6	89	Letter
	99 Misc - Demil	Replicmt Dir. RCRA Revisions	1	0	89	Rplcmnt
	99 Misc - Demil	Installation Restratrtn Program	8	2	88	Report
	99 Misc - Demil	UMDA Deactivation Furnace	3	14	88	Letter
	99 Misc - Demil	Joint Legslve Committee	2	10	88	Tstmony

Index of Administrative File  
Appendix 1

1330	99 Misc - Demil	Minimum Operating Temperatures	12	14	87	Memo
1329	99 Misc - Demil	Automatic waste Feed Monitoring	11	10	87	Memo
1328	99 Misc - Demil	Issues of Concern to Reg. 4	10	28	87	Memo
1327	99 Misc - Demil	Summary of Responses, NOD CSD	10	13	87	Report
1326	99 Misc - Demil	Army Reports Nrv Agnt Toole	9	22	87	Memo
1325	99 Misc - Demil	App Review Comments HW Prmt	9	9	87	Notes
1324	99 Misc - Demil	Conference Call, ERT Assistce	4	23	87	Memo
1323	99 Misc - Demil	RCRA Facility Invest. Constrnts	4	1	87	Letter
1322	99 Misc - Demil	Evaluation of Cntrl Lvls	3	20	87	Memo
1321	99 Misc - Demil	Review of Material on TAGA	1	6	87	Letter
1318	99 Misc - Demil	State of Indiana Part B Review	12	19	86	Report
1319	99 Misc - Demil	Lexington Bluegrass Army Depot	12	19	86	Report
1317	99 Misc - Demil	Request of Info. on Proposed Incin.	11	20	86	Letter
1313	99 Misc - Demil	Work Assign., Generic CAD Review, Fnl Delivrbl	11	6	86	Letter
1316	99 Misc - Demil	Nerve Agnt Demil Project	10	28	86	Memo
1315	99 Misc - Demil	Nrv Agnt Dispsl at Umatilla	9	24	86	Tstnny
1312	99 Misc - Demil	CSDS National Alternative	9	18	86	Chkist
1314	99 Misc - Demil	Information on Corrective Actn	9	4	86	Memo
1345	99 Misc - Demil	Inactive Burning Pad	8	5	86	Invntry
1346	99 Misc - Demil	Agent H Burial Pits	8	5	86	Invntry
1347	99 Misc - Demil	Missile Fuel Burning Pits	8	5	86	Invntry
1348	99 Misc - Demil	Decontaminated GB drum burial site	8	5	86	Invntry
1349	99 Misc - Demil	Demil & Decontmntn of VX Bomb	8	5	86	Invntry
1350	99 Misc - Demil	Laundry Settling Tanks, HW Activities	8	5	86	Invntry
1351	99 Misc - Demil	Ammunition Surveillance Test Area	8	5	86	Invntry
1352	99 Misc - Demil	Opn Burning Detonation OB/OD Area	8	5	86	Invntry
1320	99 Misc - Demil	Facility Management Plan	7	31	86	Plan
1311	99 Misc - Demil	Prmt Issues Rltd to US Army	5	8	86	Memo
1308	99 Misc - Demil	Fig. Metal Parts Furnace	0	0	0	Figures
1309	99 Misc - Demil	Indicator Tubes for Detection of TNT	0	0	0	Report
1310	99 Misc - Demil	Regulated Activities UMAD	0	0	0	Notes
2093	99 Misc - Demil	BRAC Realignment and Closure Env Restoration	0	0	0	Brochure
2283	255 Alternative Tech.	Videotape footage of various alternatives	8	13	96	Letter
2284	255 Alternative Tech.	Demilitarization Alternative Technology	7	2	96	Letter
2282	255 Alternative Tech.	Agent 313 Technology by Commodore	6	21	96	Letter
2301	255 Alt Technology	M4 CEP Tour	0	0	0	Video
2302	255 Alt Technology	EcoLogic Toronto Update	0	0	0	Video
2303	255 Alt Technology	EcoLogic Chemical Demilitarization Update	0	0	0	Video
2300	270 News Articles	Still Nervous; Northwest Reports	7	14	96	Video
2295	275 Public Outreach	UAD Incin Facility Impact on Airshed Pollutant	1	3	95	Agenda
2304	287 RA & Met Station	Phase 1 Quantitative RA, for Umatilla Chem.	4	0	96	Report
2298	287 RA & Met Station	One year of On-Site Met Data	9	12	95	Letter
2293	287 RA & Met Station	Draft ISCSTDFT Model	6	5	95	Drcnns
2292	287 RA & Met Station	Meteorological Data Comparison	5	3	95	Letter
2291	287 RA & Met Station	Comparison of Met Data from UMDA & US Generatn	4	10	95	Report
2296	287 RA & Met Station	Revised Met Monitoring Plan for Umatilla Depot	2	23	95	Report

Index of Administrative File  
Appendix 1

2287	287	RA & Met Station	Met Stations System Audit	2	1	95	Letter
2289	287	RA & Met Station	UADA Audit	12	20	94	Memo
2286	287	RA & Met Station	Review of Met Monitoring Plan	11	15	94	Letter
2288	287	RA & Met Station	Met Monitoring Plan	11	7	94	Memo
2295	287	RA & Met Station	Response to OR DEQ Review Comments	11	7	94	Report
2297	287	RA & Met Station	Met Monitoring Plan for the Umatilla Depot	7	15	94	Report
2290	287	RA & Met Station	Hermiston Air Quality & Met Monitoring Plan	1	0	94	Report
2294	287	RA & Met Station	Response to OR DEQ System Audit For UMDA Met	0	0	0	Report
2299	294	Meeting Notes	Quarterly Meeting Notes for 8/2-3/94	10	20	94	Letter





Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	NM	DD	YY	Type
2017	3	Environ. Permits	Draft Hazardous Waste Permit	4	5	96	Permit
2117	4	Part B Support	Does Tooele Data Demonstrate Compliance?	10	8	96	Memo
1669	4	Part B Support	Utah Federal Court Decision	8	13	96	Legal Doc
1628	4	Part B Support	BDAT Minimum Technology Standard Applicable RCR	3	15	96	Memo
2219	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	16	96	Letter
2195	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2215	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2217	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2223	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2222	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2225	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2224	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2228	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2230	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2229	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2227	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2226	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Letter
2246	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Report
2267	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Rpt/Lttr
2266	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Rpt/Lttr
2212	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	15	96	Rpt/Lttr
2231	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2194	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2218	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2197	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2220	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2221	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2234	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	14	96	Letter
2241	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2260	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2216	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2193	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2237	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2238	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	13	96	Letter
2192	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	12	96	Letter
2243	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	12	96	Letter
2244	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	12	96	Letter
2190	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	9	96	Letter
2191	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	9	96	Letter
2188	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	4	96	Letter
2185	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	31	96	Letter
2187	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	30	96	Letter
2186	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	30	96	Letter
2184	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	28	96	Letter

Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	MM	DD	YY	Type
2182	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	22	96	Letter
2183	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	21	96	Letter
2180	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	10	17	96	Letter
2177	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	9	24	96	Letter
2178	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	9	24	96	Letter
2181	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	9	23	96	Letter
2189	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	9	1	96	Letter
2171	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	23	96	Letter
2167	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	22	96	Letter
2168	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	22	96	Letter
2169	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	22	96	Letter
2170	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	22	96	Letter
2172	7	Official Comments	Public Comments	8	22	96	Testimony
2165	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	13	96	Letter
2179	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	11	96	Letter
2175	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	1	96	Letter
2174	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	7	10	96	Letter
2214	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	14	96	Letter
1786	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	13	96	Letter
1787	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	13	96	Letter
2164	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	13	96	Letter
2176	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	12	96	Letter
1791	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	12	96	Letter
2256	7	Official Comments	Public Comments From Hermiston Public Hearing	6	10	96	Transcript
1785	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	10	96	Letter
2173	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	10	96	Letter
2211	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	10	96	Letter
2210	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	10	96	Letter
2209	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	10	96	Letter
2213	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	10	96	Letter
2205	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	9	96	Letter
2255	7	Official Comments	Public Comments From Pendleton Public Hearing	6	7	96	Transcript
2204	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	6	96	Letter
2254	7	Official Comments	Public Comments from Kennewick Public Hearing	6	5	96	Transcript
2206	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	6	2	96	Letter
1784	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	30	96	Letter
1790	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	30	96	Letter
2200	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Letter
2201	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Letter
2202	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Letter
2232	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	29	96	Statement
2253	7	Official Comments	Public Comments Received From PDX Pblc Hearing	5	29	96	Testimony
2203	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	28	96	Letter
1788	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	5	15	96	Letter

Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	MM	DD	YY	Type
1783	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	29	96	Letter
1789	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	26	96	Letter
2198	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	26	96	Letter
1782	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	25	96	Letter
1781	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	19	96	Letter
1780	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	15	96	Letter
1779	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	12	96	Letter
1778	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	11	96	Letter
1777	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	9	96	Letter
1776	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	7	96	Letter
1773	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	4	5	96	Letter
1771	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	3	29	96	Letter
1770	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	3	20	96	Letter
2196	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	27	95	Letter
2208	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	11	22	95	Letter
2199	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	8	22	95	Letter
2166	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Report
2245	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2242	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2240	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2239	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2233	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Letter
2236	7	Official Comments	Public Comments	0	0	0	Letter
2235	7	Official Comments	Public Comments	0	0	0	Letter
2232	7	Official Comments	Public Comments	0	0	0	Letter
2207	7	Official Comments	Public Comments Received 4/5/96 to 11/15/96	0	0	0	Drawings
2264	8	Public Notices	UAD Public Comments By CTUIR	11	15	96	Binder
2265	8	Public Notices	UAD Public Comments By Karyn Jones	11	15	96	Binder
1729	8	Public Notices	"Your Opinion Counts!"-for 8/22-23/96 EQC Mtg	8	20	96	NewsAdv
1683	8	Public Notices	"Your Opinion Counts!"-Info Meeting Notice	8	17	96	NewsArt
1675	8	Public Notices	"Your Opinion Counts!"-Info Meeting Notice	8	3	96	NewsArt
2263	8	Public Notices	UAD Public Comments 6/17/96-11/15/96	6	17	96	Binder
1565	8	Public Notices	Chance to Comment on Extension, Comment Period	6	17	96	Notice
1566	8	Public Notices	Chance to Comment on Extension, Comment Period	6	17	96	Notice
2158	8	Public Notices	Umatilla Public Hearing, Tape 1, Hermiston	6	10	96	Cassette
2159	8	Public Notices	Umatilla Public Hearing, Tape 2, Hermiston	6	10	96	Cassette
2160	8	Public Notices	Umatilla Demilitarization Public Hearing Tape	5	29	96	Cassette
2161	8	Public Notices	Umatilla Demilitarization Public Hearing Tape	5	29	96	Cassette
2162	8	Public Notices	Umatilla Army Depot Public Hearing, Pndltn, Kn	5	13	96	Cassette
2262	8	Public Notices	UAD Public Comments 5/13/96-6/17/96	5	13	96	Binder
1447	8	Public Notices	Chance to Comments	4	5	96	NewsArt
1562	8	Public Notices	Chance to Comment on Findings and Risk Asses.	4	5	96	Notice
1563	8	Public Notices	Chance to Comment on Proposed Haz Waste Permit	4	5	96	Notice
1564	8	Public Notices	Chance to Comment on Proposed Air Quality Perm	4	5	96	Notice

Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	MM	DD	YY	Type
1841	8	Public Notices	Fact Sheet for Draft HW Permit	4	5	96	Fact Sheet
1951	9	Governor Corres.	Letter of Concern to EPA re: RCRA issues	1	22	96	Letter
1378	9	Governor Corres.	Response to 2/22&3/7,96 ltrs from PDeFazio	3	19	96	Letter
1953	9	Governor Corres.	Letter to Defazio from Governor	4	3	96	Letter
1952	9	Governor Corres.	Letter to Gov from Defazio	3	25	96	Letter
1531	9	Governor Corres.	Rpt on Status of Umatilla Permitting Decisions	5	31	96	Memo
1967	9	Governor Corres.	GDecker response to Gov letter 10/7/96	11	7	96	Letter
1968	9	Governor Corres.	Letter to WPerry re:EQC	10	14	96	Letter
1966	9	Governor Corres.	Response to D173Letter from JChien	11	8	96	Letter
1077	10	Correspondence	Letter from Rorton to DeFazio	5	6	96	Letter
1671	10	Correspondence	Defazio's Reponse to Army comments 7/15/96	7	15	96	Letter
1707	10	Correspondence	White House Correspondence	7	17	96	Letter
1708	10	Correspondence	PMCD memo re: EQC Meeting 8/22/96	8	27	96	Memo
1847	10	Correspondence	Response letter to Wendell Ford	9	14	96	Letter
2261	10	Correspondence	Public Comment Received Ater 11/15/96	11	18	96	Letter
1854	15	CTUIR	Unable to attend EQC Briefing on 4/12/96	4	12	96	Letter
1567	15	CTUIR	CTUIR/SSRP Follow-up on DEQ Briefing to EQC	4	26	96	Letter
1629	15	CTUIR	Response to 4/26/96 letter	5	26	96	Letter
1611	32	Other Reports	M55 Rocket Separation Study	11	22	85	Report
1548	32	Other Reports	US Chem Weapons Destruction Program	9	0	94	Report
1426	55	Alternative Tech	Recommendations for Disposal	3	7	94	Report
1692	55	Alternative Tech	CTUIR Material given to EQC	4	12	96	Comments
1988	55	Alternative Tech	Promise of Alternative Technologies	10	30	96	Report
1810	80	CSEPP	Governor's CSEPP concerns for FEMA and Army	7	1	96	Letter
1697	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	15	96	Letter
1698	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	Letter
1699	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	Letter
1700	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	Letter
1701	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	Letter
1702	80	CSEPP	UMCDF OEM Presentation to EQC-invitation	8	16	96	Letter
2083	80	CSEPP	Comments to be entertained by EQC	11	13	96	Letter
2075	80	CSEPP	November 5-6, 1996 Agenda Proposal	10	14	96	Memo
2077	81	CAIRA Plan & Update	Change 1 to UMCDF CAIRA Plan, dated 4/96	7	31	96	Memo
2269	87	Combustion Risk	Draft Pre-Trial RA Proposed at Umatilla Chem.	4	0	96	Report
2268	87	Combustion Risk	Draft Pre-Trial RA Proposed at Umatilla Chem.	4	0	96	Report
2257	92	EQC Documents	Tape 1, Sides 1 & 4, EQC in Pendleton	11	22	96	Cassette
2258	92	EQC Documents	Tape 2, Side 6, 2, and 5, EQC in Pendleton	11	22	96	Cassette
2259	92	EQC Documents	Tape 3, Side 3, EQC in Pendleton	11	22	96	Cassette
2044	92	EQC Documents	DEQ Directors Recommendations to EQC on BAT	11	22	96	Fax
2045	92	EQC Documents	Proposed Prmt Conditions from Commission Mtgs	11	22	96	Attach B
2046	92	EQC Documents	Dept. Recommended Permit Cndtns from Commn Mt	11	22	96	Cndtn
2047	92	EQC Documents	Qstns about proposed UMCDF	11	21	96	Memo
2050	92	EQC Documents	Transmittal of Public Comments	11	18	96	Memo
2048	92	EQC Documents	Concerns regarding Emergency Preparedness Issu	11	15	96	Letter

Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	MM	DD	YY	Type
2146	92	EQC Documents	Tape 1, Side 1 and Side 3	11	15	96	Cassette
2147	92	EQC Documents	Tape 2, Side 2 and Side 4	11	15	96	Cassette
2148	92	EQC Documents	Tape 3,	11	15	96	Cassette
2049	92	EQC Documents	Response to Umatilla Documents for 11/15/96	11	14	96	Memo
2051	92	EQC Documents	EQC Meeting 11/14-15/96 in Portland	11	14	96	Agenda
2149	92	EQC Documents	Tape 3	11	14	96	Cassette
2150	92	EQC Documents	Tape 2, Side 2 and Side 4	11	14	96	Cassette
2151	92	EQC Documents	Tape 1, Side 1 and Side 3	11	14	96	Cassette
2055	92	EQC Documents	Transmittal of Umatilla Doc in Prep for 11/15/96	11	6	96	Memo
2056	92	EQC Documents	Best Available Technology Finding	11	5	96	Memo
2057	92	EQC Documents	Notice to Persons Interested in Proposed Incln	11	0	96	Notice
2072	92	EQC Documents	Copy of OSU Dioxin Paper	10	31	96	Memo
2058	92	EQC Documents	Rpt to Questions on Dioxin Formation at UMCDF	10	29	96	Report
2062	92	EQC Documents	EQC Work Session 9-27-96	10	27	96	Minutes
2053	92	EQC Documents	EQC Meeting 11/22/96 in Pendleton	10	24	96	Agenda
2052	92	EQC Documents	EQC Meeting 11/22/96 in Pendleton	10	23	96	Agenda
2054	92	EQC Documents	EQC Meeting 11/14-15/96 in Portland	10	23	96	Agenda
2059	92	EQC Documents	EQC Minutes 10/11/96 Regular Meeting	10	11	96	Minutes
2060	92	EQC Documents	Handout for 10-11-96 EQC Meeting	10	11	96	Handout
2157	92	EQC Documents	EQC Meeting, Umatilla Portion	10	11	96	Cassette
1825	92	EQC Documents	EQC Meeting Agenda for 10/10-11/1996	10	10	96	Agenda
2061	92	EQC Documents	EQC Work Session 10-10-96	10	10	96	Minutes
2137	92	EQC Documents	Side 6 and Side 8	9	27	96	Cassette
2138	92	EQC Documents	Side 5 and Side 7	9	27	96	Cassette
1822	92	EQC Documents	EQC Meeting Agenda for 9/27/96	9	27	96	Agenda
1823	92	EQC Documents	Discussion of proposed permit condition-UMCDF	9	27	96	Report
1824	92	EQC Documents	Discussion of ORS 466.055 Findings	9	27	96	Report
2063	92	EQC Documents	Discussion of ORS 466.055b Findings	9	27	96	Memo
2071	92	EQC Documents	Executive Summary from the NRC report on AltTe	9	25	96	Memo
1821	92	EQC Documents	Response to Hlorenzen's 9/5/96 letter	9	17	96	Letter
2064	92	EQC Documents	EQC 9-27-96 Meeting in Portland	9	13	96	Agenda
2070	92	EQC Documents	November EQC Meeting	9	13	96	Memo
1820	92	EQC Documents	EQC Worksession 9/27/96 list of goals	9	12	96	Memo
1775	92	EQC Documents	Leak incident at Tooele, Utah	9	10	96	Report
1774	92	EQC Documents	Public survey and public info activities	8	31	96	Memo
1769	92	EQC Documents	Agenda Item H, EQC Meeting 8/23/96 BAT	8	28	96	Letter
1768	92	EQC Documents	UMCDF OEM Presentation to EQC	8	27	96	Letter
1819	92	EQC Documents	EQC Meeting notes from 8/22/96	8	27	96	Notes
2139	92	EQC Documents	Tape 1, EQC Meeting	8	23	96	Cassette
2140	92	EQC Documents	Tape 2, EQC Meeting	8	23	96	Cassette
2141	92	EQC Documents	Tape 3, EQC Meeting	8	23	96	Cassette
1706	92	EQC Documents	EQC Meeting Agenda for 8/22-23/96	8	22	96	Notice
1930	92	EQC Documents	Written Testimony from KJones 8/22/96	8	22	96	Reports
1931	92	EQC Documents	Letter from Rep.Chuck Norris	8	22	96	Letter

Item B 000173

Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	MM	DD	YY	Type
2144	92	EQC Documents	Tape 1, EQC Meeting, Afternoon Session	8	22	96	Cassette
2145	92	EQC Documents	Tape 2, EQC Meeting, Afternoon Session	8	22	96	Cassette
2142	92	EQC Documents	Tape 1, EQC Meeting, Evening Session	8	22	96	Cassette
2143	92	EQC Documents	Tape 2, EQC Meeting, Evening Session	8	22	96	Cassette
1929	92	EQC Documents	DWysocki unable to attend August EQC meeting	8	13	96	Letter
1772	92	EQC Documents	Request for attendance to 8/22/96 EQC Mtg	8	8	96	Letter
1928	92	EQC Documents	UAD items for 8/22-23/96 EQC Meeting	8	8	96	Memo
1704	92	EQC Documents	Transmittal of additional info on UMCDF	8	7	96	Memo
1705	92	EQC Documents	Transmittal of info for EQC Meeting 8/22-23/96	8	7	96	Fax
1817	92	EQC Documents	EQC 7/11/96 worksession R.A.response issues	7	11	96	Report
1818	92	EQC Documents	Chemical Demil Program presentation for 7/11/9	7	11	96	Report
1927	92	EQC Documents	Transmittal of "US Chem Destr.Program:Views...	7	3	96	Memo
1602	92	EQC Documents	Transmittal of Documents to EQC	7	2	96	Memo
1601	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1600	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1599	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1815	92	EQC Documents	Invitation to submit Alt.Tech videos	7	2	96	Letter
1626	92	EQC Documents	EQC Meeting Agenda for 6/11-12/96	6	27	96	Agenda
1652	92	EQC Documents	Interagency Agreement - DEQ & OSU	6	25	96	Agreement
1625	92	EQC Documents	Response to James Quigley 5/30/96 letter	6	24	96	Letter
1551	92	EQC Documents	Ltr to JHaley w/MHarrison Testimony to EQC	5	31	96	Letter
1552	92	EQC Documents	Ltr to JGorrell requesting additional info	5	31	96	Letter
1553	92	EQC Documents	May 17 Umatilla Discussion list of speakers	5	17	96	Memo
1926	92	EQC Documents	Karyn Jones' Written Testimony for 5/17/96 EQC	5	17	96	Reports
2065	92	EQC Documents	Status of Emergency Response	5	17	96	Prsntation
2066	92	EQC Documents	Material Submitted by Karyn Jones	5	17	96	Report
2067	92	EQC Documents	Comments of Destruction of Chem Weapons at UAD	5	17	96	Cmnts
1513	92	EQC Documents	EQC Worksession Agenda 5/16/96	5	16	96	Agenda
1583	92	EQC Documents	EQC Meeting Agenda for 5/16-17/96	5	16	96	Agenda
1584	92	EQC Documents	Air Quality Permit Overview for 5/16/96 EQC	5	16	96	Overheads
1925	92	EQC Documents	EQC Worksession air presentation 5/16/96	5	16	96	Overheads
2135	92	EQC Documents	EQC Work Session Potential Alt. to Incin	5	16	96	Video
2136	92	EQC Documents	EQC Work Session Potential Alt. to Incin	5	16	96	Video
2152	92	EQC Documents	EQC Work Session, Tape 1	5	16	96	Cassette
2153	92	EQC Documents	EQC Work Session, Tape 2	5	16	96	Cassette
2154	92	EQC Documents	EQC Work Session, Tape 3	5	16	96	Cassette
2155	92	EQC Documents	EQC Work Session, Tape 4	5	16	96	Cassette
2156	92	EQC Documents	EQC Work Session, Tape 5	5	16	96	Cassette
2068	92	EQC Documents	Umatilla Chemical Weapons Destruction Permits	5	7	96	Letter
1924	92	EQC Documents	Transmittal of Alternative Technologies info	5	3	96	Memo
1264	92	EQC Documents	Handout to EQC from Brett McKnight, DEQ	5	0	96	Binder
2069	92	EQC Documents	Delay Granting of the Army's Permit	4	30	96	Letter
1919	92	EQC Documents	Minutes for 4/12/96 EQC Meeting	4	22	96	Minutes
1512	92	EQC Documents	Letter to Mick Harrison	4	19	96	Letter

Index of Documents Provided to the EQC  
Appendix 2

Item #	Heading #	Heading	Document	MM	DD	YY	Type
1582	92	EQC Documents	Response to OEC ltr dated 4/9/96 by JCharles	4	18	96	Memo
1920	92	EQC Documents	Emergency Update for 5/17/96 EQC Meeting	4	18	96	Letter
1921	92	EQC Documents	Emergency Update for 5/17/96 EQC Meeting	4	18	96	Letter
1922	92	EQC Documents	Emergency Update for 5/17/96 EQC Meeting	4	18	96	Letter
1923	92	EQC Documents	Participation in Alts to Incin. discussion	4	18	96	Letter
1502	92	EQC Documents	HW Permit Presentation - Overheads	4	12	96	Overheads
1501	92	EQC Documents	Confirmation of Attendance to May 16 mtg	4	10	96	Letter
1500	92	EQC Documents	Letter from John Charles re: EQC Decisions	4	9	96	Letter
1918	92	EQC Documents	Umatilla Chemical Weapons Incinerators	3	15	96	Memo
1581	92	EQC Documents	Minutes of the 250th Meeting	2	23	96	Minutes
1216	92	EQC Documents	Presentation to the EQC	2	9	96	Letter
1217	92	EQC Documents	Presentation to the EQC	2	6	96	Letter
1042	92	EQC Documents	Provide Comments; Video	12	26	95	Letter
1032	92	EQC Documents	Adoption of Rules Chapter 340	4	25	86	Memo
2301	255	Alt Technology	M4 CEP Tour	0	0	0	Video
2302	255	Alt Technology	EcoLogic Toronto Update	0	0	0	Video
2303	255	Alt Technology	EcoLogic Chemical Demilitarization Update	0	0	0	Video





## SUMMARY OF PUBLIC COMMENTS AND COMMISSION RESPONSES

Hazardous Waste Treatment and Storage Permit and  
ORS 466.055 and 466.060 Criteria

U.S. Army Umatilla Chemical Depot  
Umatilla Chemical Demilitarization Facility  
I.D. Number: OR6 213 820 917

February 7, 1997

This Response to Comments document has the following Sections:

- |                       |                                |
|-----------------------|--------------------------------|
| I. Introduction       | III. Direction From Commission |
| II. Comments Received | IV. Response to Comments       |

### I. INTRODUCTION

The U.S. Army has applied for a hazardous waste treatment and storage permit to incinerate chemical agent munitions. The incineration treatment of the chemical agents, along with the various munition components consisting of explosives, propellants, and metal casings, is sometimes referred to as "demilitarization."

The Department of Environmental Quality reviewed the hazardous waste permit application and determined that the application was complete in accordance with Title 40 Code of Federal Regulations [40 CFR] Section 124.3.<sup>1</sup> The Department then issued for public comment the draft hazardous waste permit and the air contaminant discharge permit. Also issued for public comment was the Pre-Trial Burn Risk Assessment [PreRA], and, an invitation to comment on the ORS 466.055 and 466.060 criteria pursuant to which the Environmental Quality Commission must make affirmative findings before it can issue the hazardous waste permit. The comment period ended November 15, 1996.<sup>2</sup> At a meeting held on November 22, 1996, the Department was directed by the Commission to finalize the hazardous waste permit decisions.

<sup>1</sup> Adopted as Oregon Rule at OAR 340-100-002.

<sup>2</sup> The original comment period was extended on June 15, 1996.



## II. Comments Received

All comments received during the comment period were provided to the Commission for its review. The comments were also placed in the administrative record maintained at the Department office in Bend.

At the November 22, 1996 meeting the Department provided to the Commission a summary of the comments received during the comment period. In general, the following statements can be made about the comments received.

### Statistics

- 188 submittals (both verbal testimony and written comments) were received and entered into the administrative record. A submittal may have contained anywhere from one comment to tens of comments. Two submittals were noted but did not contain any testimony.
- Out of the 188 submittals, 67 were from the immediate region (e.g., Hermiston), 33 were from the region (e.g., Tri-Cities and Pendleton), and 88 were from Out-of-Region (e.g., Portland).
- Of the 67 submittals received from the immediate region, 48 (72%) were in favor of issuing the permit; 19 (28%) were not in favor of issuing the permit).
- Of the 33 submittals received from the region, 12 (36%) were in favor of issuing the permit; 21 (64%) were not in favor of issuing the permit.
- Of the 88 submittals from out-of-region, 6 (7%) were in favor of issuing the permit; 82 (93%) were not in favor of issuing the permit.

### General

- The vast majority of the comments were directed towards the Commission's findings of the ORS criteria. Very few submittals dealt directly with specific conditions of the hazardous waste permit or specific items with the PreRA.
- Based on testimony from the several Commission meetings, the Commission directed that several additional permit conditions be included in the hazardous waste permit.
- Submittals received from the U.S. Army and EPA Region 10 did contain many comments on specific conditions of the permit.

Issue: Incineration Is The Best Available Technology

120 submittals contained comments regarding whether incineration represents best available technology. The significant comments are listed below.

Agree

- Incineration has been found by independent experts to be an acceptable technology
- JACADS and Tooele are operating effectively and efficiently.
- Currently, incineration is best available technology.
- Alternative technologies are immature for chemical agent.
- There are no viable alternative technology for metal parts and energetics except incineration.
- EPA and Department of Health and Human Services contends that incineration is a safe and proven method.
- Continued storage is not a technology.
- Incineration has more control than similar industrial applications.
- Need more time to develop information on alternative technologies.

Does Not Agree

- Incineration is unsafe and costly.
- JACADS and Tooele have had experiences of upsets and operational problems.
- Incineration emits toxic chemicals and would/could effect human health, the ecology, and agricultural crops.
- "Closed-loop" technologies are better because they do not emit toxic chemicals.
- Reconfiguration and storage, or continued storage alone, and then wait for a better treatment technology is preferable.
- Other countries are using alternative technologies.
- Some alternative technologies have commercial scale applications.

Issue: The Facility Will Not Cause An Adverse Effect To Human Health Or The Environment

66 submittals contained comments regarding whether an incineration facility is needed. The significant comments are listed in the following column.

Agree

- The permit should be issued to get rid of the threat posed by chemical agent munitions
- Findings and recommendations from the NRC conclude that incineration is safe
- Delays will cause increased exposure from leaks
- Incineration is a safe technology
- Johnston Atoll ecological monitoring has shown no adverse effect

Does Not Agree

- A comparative assessment between incineration and alternative technologies is necessary to reach a decision.
- Incineration will emit dioxins and other toxins which at low dosages will create human health and environmental harm.
- The Pre-Trial Burn Risk Assessment is flawed because it omitted issues such as not evaluating certain pathways, not evaluating synergistic effects, not accounting for all the potential chemical emissions, etc.,
- The Chemical Stockpile Emergency Preparedness Program (CSEPP) is not prepared; the permit

should not be issued until it is. Sirens are not working, schools are not pressurized, inadequate resources at local level, the Emergency Operations Center is not pressurized and must use gas masks in an emergency, inadequate notification to immediate community, etc.,.

Issue: Applicant Has Demonstrated Ability And Willingness To Operate The Facility In Compliance, And, Applicant Has Demonstrated Financial And Technical Capability.

24 submittals contained comments regarding whether the Applicant (U.S. Army) has demonstrated adequate capability. The significant comments are listed below:

Agree

- Tooele and JACADS are built and operated well
- There is trust in the government that they have the expertise and care to insure safe operation

Does Not Agree

- The Army has not been able to operate the JACADS and Tooele facilities adequately
- The Army has had a history of misrepresentation, misinformation, and deceit
- The Army has been fined at JACADS by EPA for non-compliance

Issue: The Facility Is Needed

41 submittals contained comments regarding whether an incineration facility is needed. The significant comments are listed below.

Agree

- The risk of storage, and storage operations are more than the risk of incineration

Does Not Agree

- Risk of storage is exaggerated and there is no need to rush to incinerate
- The risk of storage can be lessened by reconfiguration

Issue: Public Participation

27 submittals contained comments regarding public participation. The significant comments are listed below.

Agree

- Commenters appreciated the opportunity to address the Commission face-to-face
- Citizens have been active and informed on the project

Does Not Agree

- The State has not engaged in a government-to-government relationship with the Confederated Tribes of the Umatilla Indian Reservation [CTUIR]
- DEQ has acted as an advocate of incineration, or, not as an advocate for the environment

- Public comment period was extended
- DEQ has maintained an office in Hermiston
- Commission and Department decision-makers were not at some public forums
- There is too much information to review and not enough time for people to understand all the issues

#### Various Issues:

Several submittals contained comments regarding various issues. These issues mentioned are listed below.

##### Agree with Permitting

- The Chemical Stockpile Emergency Preparedness Program (CSEPP) is not prepared; the permit should be issued to get rid of the threat posed by chemical agent munitions.
- Objection to commenters from out-of-area trying to stop the project
- There is adequate oversight for the project
- Willing to accept processing risk over risk of continued storage
- There has been a multitude of research and studies on the project
- Munitions are deteriorating with age
- Transportation is not an option

##### Does Not Agree with Permitting

- Dissatisfaction with the Environmental Impact Statement
- Issues of Environmental Justice
- Oregon should follow lead of other states trying to halt incineration
- Issues of previous exposures from Hanford
- There should not be a delay in permitting the facility
- No import of other waste should be allowed Federal law prohibits transportation so the stockpile must stay and be destroyed
- The stockpile should be moved to Tooele, Utah or JACADS
- The need to limit operations during adverse weather conditions
- The Chemical Stockpile Emergency Preparedness Program is not adequately ready. Sirens are not working, schools are not pressurized, inadequate resources at local level, the Emergency Operations Center is not pressurized and must use gas masks in an emergency, inadequate notification to immediate community, etc.,

### III. Direction From The Commission

At the November 22, 1996 meeting, the Commission made a unanimous finding that the baseline incineration system as proposed by the U.S. Army is best available technology. After making this finding, the Commission then deliberated on the remaining ORS 466.055 and 466.060 criteria. The Commission stated that the remaining criteria could be found to be made in the affirmative, and directed that the Department and the Attorney General draft an Order for Commission issuance.

After deliberations on the remaining findings, the Commission reviewed potential permit conditions to be included. The administrative record of this meeting indicates what specific conditions are needed to be included in the hazardous waste permit. The permit conditions, as deliberated by the Commission, have been added to the final hazardous permit (see Attachment A for a listing of the permit conditions).

The Commission also directed the Department to review the Army's comments and make the appropriate technical corrections to the hazardous waste permit, as well as corrections from other comments. The Department has conducted this review and made the appropriate changes. A discussion of these changes, as required by 40 CFR 124.17(a),<sup>3</sup> follows in section IV.D of this document.

#### IV. RESPONSE TO COMMENTS

##### IV.A. Commission Findings

The Order that the Commission issued on February 7, 1997, serves as the formal decision and Response to Comments. The Order makes effective the affirmative findings for the ORS 466.055, 466.060, and OAR 340-120 criteria, and, summarizes some of the important issues, along with the documentation and testimony (from the Commission's administrative record) used in reaching the hazardous waste decisions.

##### IV.B. Summary of Commission Findings

The Order issued by the Commission on February 7, 1997 stated the following about the findings pursuant to ORS 466.055, 466.060, and OAR 340-120:

*For the finding that the baseline incineration system is best available technology:* The Commission heard testimony from alternative technology vendors, representatives of the Army (both representing alternative technology and incineration), and other experts and stakeholders from the public, both from within the region and without. The Commission also toured the similar-site facility located near Tooele, Utah.

The Commission deliberated on the issues of operational history at Johnston Atoll and Utah, issues of dioxin emissions and combustion by-product formation, issues of possible neutralization of mustard agent and other possible technologies, and issues of availability and schedule. The Commission reviewed many written comments and heard testimony regarding alternatives. The Commission was particularly persuaded by the BEST AVAILABLE TECHNOLOGY REPORT prepared for the Department by Ecology and Environment, Inc., the REPORT ON DIOXINS by Dr. Kristina Iisa, Oregon State University, October 1996, and testimony of Army Assistant

<sup>3</sup> Adopted as Oregon Rule by OAR 340-100-002.

Secretary Decker regarding potential neutralization of mustard agent. The Commission has responded in the affirmative by vote on November 22, 1996 and issued an Order dated February 7, 1997 that the baseline system is best available technology.

*For the finding of meeting the 250 foot setback:* The Commission reviewed the Department's staff report dated November 15, 1996 and responded in the affirmative that the facility meets this criteria.

*For the finding of owner and operator capability:* The Commission heard testimony from representatives of environmental organizations, the Army, and from the public regarding the operational histories at Johnston Atoll and Tooele Chemical Disposal Facility. From the testimony and comments, the Commission responded in the affirmative that the owner and operator has demonstrated adequate capability.

*For the finding of adequate compliance history:* As above, the Commission heard testimony of representatives from environmental organizations, the Army, and from the public regarding the operational histories at Johnston Atoll and Tooele Chemical Disposal Facility. The Commission also reviewed the Department's November 1996 staff report regarding in detail the Army's compliance history at Johnston Atoll. From the testimony and comments, the Commission responded in the affirmative that the owner and operator has demonstrated adequate capability.

*For the finding that there is a need for the facility:* The Commission reviewed written comments and heard testimony regarding the need. The Commission heard issues regarding the potential to disassemble and store munitions, or even continue storage until better technologies are developed, rather than continue with incineration. The Commission concluded that UMCDF will reduce, and eventually eliminate the risk to surrounding communities from continued storage of the chemical agents and munitions; therefore the need for UMCDF is demonstrated because operation of the proposed facility will result in a higher level of protection. From the testimony and comments, the Commission responded in the affirmative.

*For the finding that the facility will have no major adverse effect on public health and safety, or the environment:* The Commission reviewed written comments and heard testimony regarding the potential effects from the UMCDF. The Commission became aware of issues of dioxin and furan formation, known and unknown combustion by-products of incineration, and of design controls proposed for the UMCDF. The Commission was particularly persuaded by the DRAFT PRE-TRIAL BURN RISK ASSESSMENT prepared for the Department by Ecology and Environment, Inc., REPORT ON DIOXINS by Dr. Kristiina Iisa, Oregon State University, PERSPECTIVES ON THE UMATILLA QUANTITATIVE RISK ASSESSMENT RESULTS prepared by SAIC, September 1996, DEQ and Ecology and Environment RESPONSE TO RISK ASSESSMENT ISSUES, and testimony of Gary Boyd, SAIC, before the Commission on November 22, 1996. From the testimony and comments, the Commission responded in the affirmative.



#### IV.C Changed Permit Conditions Based on Commission Direction

As part of its deliberations to make findings on the ORS criteria, based on the testimony from the Applicant, the Department, and from interested parties, and based on the comments and concerns raised by interested parties on emergency response issues, the Commission decided that additional permit conditions should be made part of the hazardous waste permit. In accordance with 40 CFR 124.17(a)(1),<sup>4</sup> Attachment A lists the permit conditions that have been added or changed. Through its deliberations, these conditions were included in the hazardous waste permit by the Commission because they are deemed necessary to protect human health and the environment.

#### IV.D. Technical Changes to Hazardous Waste Permit

At the November 22, 1996 Commission meeting, the Department was directed to incorporate the appropriate technical changes to the permit that do not affect policy decisions. The Department reviewed comments made by the U.S. Army and EPA Region 10 and made some permit condition changes based on significant comments.

In accordance with 40 CFR 124.17<sup>4</sup> and at the direction of the Commission, the following significant changes have been made to the hazardous waste permit.

##### IV.D.1 Technical Significant Changes Based on U.S. Army Comments

The following comments were submitted by the Army November 12, 1996 and entered as comment no. 143. The following Army comment numbers are from that submittal.

- Based on Army comment no. 9, the Department has changed permit condition I.W to allow for ten days reporting, instead of three, in order to allow the Permittee to report timely, and to allow for a more thorough report.
- Based on Army comment no. 22, the Department has changed permit condition IV.H.4. to allow primary sumps to be changed out for only those primary sump systems that detect liquids in interstitial areas (between liners), instead of all sumps per campaign/annually as proposed. The Department determined that based on the small size, the potential for tank system compromised by too much "chipping out" of the surrounding concrete, and the design of the buildings themselves which minimize releases to the environment, it would be better just to remove, inspect, and repair those primary sump systems that detect leaks between the primary liner and the secondary containment.

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<sup>4</sup> Adopted as Oregon Rule at OAR 340-100-002.

- Based on Army comments no. 25 and no. 26, the Department agrees to the requirement for Total Organic Carbon (TOC) to be measured during the trial burns and not as a continuous emissions monitor. There is not a continuous emission monitor for TOC. The Department has eliminated permit condition VI.A.3.iii., and has added permit condition VI.A.5.iii.c.
- Based on Army comment no. 45, the Department agrees that sulfur dioxide (SO<sub>2</sub>), hydrocarbon (HC), and hydrogen chloride (HCl) do not need to be measured in the Metal Parts Furnace discharge airlock. It is sufficient to measure the airlock for agent to protect human health. The Department has changed Attachment 4.

#### IV.D.2 Technical Significant Changes Based on U.S. EPA Region 10 Comments

The Department met with U.S. Environmental Protection Agency Region 10 on October 28-29, 1996 to discuss comments that Region 10 had. The Department developed a memorandum of these comments and placed it in the administrative record as comment no. 187 and as administrative record index no. 2252. The comment numbers referenced below are the EPA comment numbers found in the memorandum.

- Based on EPA comment no. 19, the Department agrees that an assessment and an appropriate permit modification must be submitted to address secondary containment for the MDB carbon filters units. This condition is considered necessary and consistent with the Army review of the Tooele Chemical Disposal Facility detection of agent leaks at the carbon filters units. The Department has added permit condition II.O.10 to require an assessment within 360 days of the effective date of the permit.
- Based on EPA comment no. 36, the Department agrees that the Brine Reduction Unit, which is a unit factored in the Pre-Trial Burn Risk Assessment, should have the same level of notification requirement for emission exceedances as for the incinerator units. Therefore, the Department has added permit condition V.A4.vii to include a notification requirement if emission rates are exceeded.
- Based on EPA comments no. 43 and no. 71, the Department agrees that additional chemical-specific feed rate limits should be added in addition to the munition feed rate limits. The additional feed rate limits will help insure that any potential variations in the chemical makeup of the waste will not exceed emission limits which have been determined to be protective in the Pre-Trial Burn Risk Assessment. The Department has revised Tables 6-1, 6-4, 6-8, and 6-12, and, permit condition VII.B.3.i.

#### IV.E. Other Changes to the Permit

At the November 22, 1996 Commission meeting, the Department was directed to also make minor (i.e., insignificant) changes. The U.S. Army and U.S. Environmental Protection Agency made many minor comments regarding the draft hazardous waste permit.

The Department reviewed the comment and made appropriate changes. The changes in nature were: Typographical errors, editorial changes, wording change for clarification, modifications to aid in enforcement but not changing the requirement, changes to make condition consistent with the Part B permit application, changes to add more specificity but not changing the requirement, and changes to add more stringency without altering operations as proposed by the Permittee.

#### IV.F. Changes That Were Not Made to the Permit

As stated before, many comments were received from the Army and EPA Region 10, and just a few from others. The Commission and Department reviewed these comments and decided that there inclusion in the hazardous waste permit is not warranted.

**ATTACHMENT A**

**1) STORAGE RISK - MODIFICATION TO THE OPENING STATEMENT OF THE PERMIT INTRODUCTION FOUND ON PAGE 3**

The Permittee shall proceed expeditiously in procuring a contractor, beginning construction and commencing operation of the Umatilla Chemical Disposal Facility (UMCDF) in order to eliminate the significant risk to human health and the environment posed by the continued storage of the chemical weapons and chemical agents at the Umatilla Chemical Storage Depot.

**2) CSEPP READINESS- PERMIT CONDITIONS**

**II.H.4.** The Permittee shall submit within 150 days of the effective date of the permit and every 180 days thereafter until all agent at the Depot has been destroyed; a written progress report to the Department on the status of the Chemical Stockpile Emergency Preparedness Program (CSEPP). The report shall evaluate CSEPP's readiness for responding to an incident at the Umatilla Chemical Depot and should address at a minimum, status of community emergency sirens and distribution of tone alert radios of the Alert Notification System (ANS); the ability to provide off-site chemical agent monitoring and decontamination during an incident, off-site triage and treatment of casualties; and, the state of enhanced sheltering and positive pressurization of buildings, such as schools and hospitals, where substantial numbers of persons can be expected to gather daily. [40 CFR 270.32(b)(2)]

**II.H.4.i.** The Permittee shall not commence any thermal shakedown, trial burn, or post-trial burn activity, as defined in Module VI, until the Department has notified the Permittee in writing that it has received written notification from the Governor of the State of Oregon, or his designee, that an adequate emergency response program is in place and fully operational for protecting the general population (Chemical Stockpile Emergency Preparedness Program [CSEPP]). The written determination of the Governor (or his designee) shall be placed in the administrative record. [40 CFR 270.32(b)(2)]

**3) REMOVAL OF THE UMCDF STRUCTURES AT CLOSURE - PERMIT CONDITIONS**

**II.J.9** Following submittal of all successful closure decontamination certifications in accordance with permit condition II.J.6., the Permittee shall dismantle, remove, and properly manage the disposal of the Munition Demilitarization Building (MDB) to an approved disposal facility. All other structures (e.g., buildings, parking areas, underground structures, fences, etc.) within the boundary of the UMCDF shall also be properly managed and removed to a disposal facility. All areas where structures have been removed shall be reclaimed. If the Umatilla Chemical Depot - Local Reuse Authority (UCD-LRA) identifies a use for any of the structures, except the MDB, the Permittee may request a modification to this permit condition as a class 2 modification in accordance with 40 CFR §270.42(b) and 40 CFR §270.32(b)(2) to accommodate such use.

4) *PAS CARBON FILTER UNIT AND EMISSION TO THE CARBON FILTERS -  
PERMIT CONDITIONS*

II.R. The Permittee shall build and operate the Pollution Abatement System (PAS)/PAS Filter Systems for each incinerator in accordance with the appropriate drawings of Volume 5, Attachment D-3 and Volume VII of the application, Sections D-5B-02, D-5B-07, D-6B-02, D-6B-04, D-7B-02, D-7B-05, D-8B-02, D-8B-04, and D-8B-05. Removal of any component of the PAS Filter Systems, including but not limited to, the quench tower, venturi scrubber, packed scrubber tower, demister, or carbon filter system shall be a Class 3 permit modification and shall require Commission approval.

VI.A GENERAL CONDITIONS DURING SHAKEDOWN, TRIAL-BURN AND POST TRIAL-BURN FOR ALL THE INCINERATORS AT THE UMCDF SITE.

VI.A.1 CONSTRUCTION AND MAINTENANCE [40 CFR§264.31](trial burn stds.)

vi. The Permittee shall maintain and operate each incinerator during shakedown, trial burn and post-trial burn periods in accordance with the operating requirements specified in this permit. Each incinerator shall meet the applicable performance standards specified in permit conditions VI.B.1., VI.C.1., VI.D.1., and VI.E.1. before entering each incinerator's carbon filter system.

VII.A.8 GENERAL OPERATION (normal operation standards)

The Permittee shall maintain and operate each incinerator during shakedown, trial burn and post-trial burn periods in accordance with the operating requirements specified in this permit. Each incinerator shall meet the applicable performance standards specified in permit conditions VII.B.2., VII.C.2., VII.D.2., and VII E.2. before entering each incinerator's carbon filter system.

5) *EOC POSITIVE PRESSURE - PERMIT CONDITIONS*

II.H.5. For the UCD Emergency Operations Center (EOC) that gathers or disseminates information used to respond to off-Depot releases, the Permittee shall have a positive-pressurized Emergency Operations Center (EOC) that is adequately staffed 24 hours a day, 7 days a week. For this permit condition, "positive-pressurized" shall mean that ambient non-air vapors can not enter during times of emergency training, in the event of an actual emergency, or when tested on request by a Department inspector. The EOC must be pressurized within 300 days of the effective date of this permit, and the EOC is to comply with the staffing requirement within 90 days of the effective date of this permit.

6) *ARMY ASSURANCE OF INDEPENDENT OVERSIGHT - PERMIT CONDITIONS*

II.E.5. The Permittee shall submit, within 180 calendar days of the effective date of this permit, a written program that describes the independent oversight process for the demilitarization construction activities, health and safety operations, and chemical agent process/handling operations at the UMCDF site. All reports generated by the oversight activities described in this report and reports of independent investigations shall be made available to the Department within 15 days of report finalization, in order for the Director of the Department to attest to the effectiveness of the independent oversight program. With written direction from the Department, the Permittee shall place such

inspection reports in a public repository in Hermiston, Oregon. In the case of special independent investigations caused by unique and non-routine incidents, the Permittee shall notify the Department of the initiation of the investigation within 24 hours of the time the Permittee becomes aware of the investigations. Upon request by the Department or Commission, the permittee shall provide an updated report describing the independent oversight program that incorporates all appropriate additions and changes in response to any deficiencies or requested changes. An independent oversight review shall be conducted on a periodic basis and when specifically requested by the Department or Commission. If the Commission is not satisfied with the independent oversight program or the results of the independent investigations, the Commission may issue an order to halt immediately all operations.

7) *SHUTDOWN CONDITIONS - PERMIT CONDITIONS*

I.C.2. In accordance with ORS 466.170, the Commission may revoke this permit after public hearing upon a finding that the Permittee has violated any provision of ORS 466.005 to 466.385 and 466.890 or rules adopted pursuant thereto or any material condition of the permit, subject to review under ORS 183.310 to 183.550.

I.C.3. In accordance with ORS 466.200, if the Department or Commission finds that there is reasonable cause to believe that a clear and immediate danger to the public health, welfare or safety or to the environment exists from the continued operation of the site, the Department may halt demilitarization operations at the UMCDF. Non-compliance with the Department's written notification shall be a violation of this permit condition. Resumption of operations shall be initiated only upon written approval of the Department.

I.L.2. In accordance with ORS 466.180(1), the Department or Commission may limit, prohibit, or otherwise restrict storage and treatment operations at the UMCDF upon receipt of information that indicates non-compliance with permit condition I.L.1. The Department shall invoke such restrictions by written notification that specifies actions that the Permittee must take to comply. Non-compliance with the Department's written notification shall be a violation of this permit condition.

8) *LIABILITY ISSUE - PERMIT CONDITIONS*

II.M. The Permittee must provide the liability coverage for sudden-and-accidental-occurrence requirements, as specified in 40 CFR §264.147, and provide liability insurance in accordance with ORS 466.105(5), and 40 CFR §264.147(a) unless exempted by state or federal law.

9) *BAD WEATHER CONDITIONS - PERMIT CONDITIONS*

II.A.3. The Permittee shall submit to the Department a request for a Class 2 permit modification, within 180 days of the effective date of this permit, identifying the standard operating procedures that will be followed by Umatilla Chemical Depot and UMCDF personnel for handling and transporting munitions from the storage igloos to the UMCDF site, and for hazardous waste treatment, during inclement weather or adverse wind conditions. The Standard Operating Procedures must include a description of the weather conditions, in addition to the procedures that are to be followed by UCD and UMCDF personnel.

10) ***BASELINE MONITORING - PERMIT CONDITIONS***

II.A.4.i. Within 180 days of the effective date of the permit, the Permittee shall submit for Department review and approval a Comprehensive Monitoring Program (CMP) workplan to implement a program that will confirm results of the Pre-Trial-Burn and Post-Trial-Burn Risk Assessments for each of the areas described: Zone 1 - the Umatilla Chemical Demilitarization Facility to the Umatilla Chemical Depot fenceline, Zone 2 - the Umatilla Chemical Depot fenceline out to a fifty-kilometer radius from the UMCDF common stack, and Zone 3 - locations beyond the fifty-kilometer radius. Within the CMP, Zone 1 also is to include a monitoring system to detect permitted and unpermitted releases. The CMP for Zones 1,2, and 3 shall, at a minimum, include the following elements:

1. Baseline Monitoring Program, to include;
  - a) A current assessment of contamination of environmental media (e.g., air, soil, surface water) and ecological endpoints that are potential receptors from pathways from the Umatilla Chemical Demilitarization Facility (UMCDF) for each of the three zones described above; and,
  - b) A sampling and analysis plan with appropriate Data Quality Objectives(DQO), for all three zones to assess potential impacts from the UMCDF site. The sampling and analysis plan must include the rationale for the size, number and location of sampling points, frequency of sampling, and the rationale for the parameters being monitored.
2. Perimeter Monitoring Program in Zone 1, to include;
  - a) A sampling and analysis plan with appropriate Data Quality Objectives(DQO) for monitoring within and at the perimeter of, Zone 1, that is capable, in a timely manner, of assessing emissions of unpermitted releases of chemical agent from the UMCDF site, and from storage igloos, and;
  - b) An update to the Contingency Plan to include appropriate reaction and notifications.
3. An Historical Record, to include a written reporting and file maintenance program to effectively maintain the results of the Comprehensive Monitoring Program on an annual basis.

II.A.4.ii. Within 60 days of the Department's written approval of the CMP workplan, or written approval of a Department-modified CMP workplan, the Permittee shall submit a permit modification in accordance with 40 CFR 270.42 to implement the CMP workplan. All information generated pursuant to the monitoring program shall be placed in a public repository in Hermiston following written direction from the Department.

11) ***OFF-SITE WASTE PROHIBITION - PERMIT CONDITIONS***

II.B. Receipt of Off-site Waste, Processing and Shipment of Onsite Waste

1. The Permittee is not authorized to accept and therefore shall not receive hazardous waste, chemical agent, or munitions containing chemical agents from off-site.
2. The Permittee shall not send any material or waste off-site that has detectable amounts of GB, VX, or HD. Only material or wastes meeting the agent-free 3X or 5X criteria may be sent off-site.

3. The Permittee shall process, in accordance with this permit, all chemical agents, and chemical agent-contaminated materials currently stored or otherwise located at the Umatilla Chemical Depot.

12) *PERMIT OPENER - PERMIT CONDITIONS*

- I.C.4. If Congress or the President makes substantial changes in the Chemical Weapons Demilitarization program or in CSEPP, the Commission reserves the right to reopen the permit, after appropriate opportunity for the permittee and, at the discretion of the Commission, government officials and the public to be heard. If the Commission determines to reopen the permit, it may remove or modify conditions or impose additional conditions, relating to the reason for reopening the permit.



104