

INFORMATION SHEET
Ravenna Army Ammunition Plant
Trial Burn for Load Line 11
March 30, 2005

The Army is dedicated to keeping the public and regulatory agencies informed and involved in the environmental cleanup. There has been an active Restoration Advisory Board since 1996 and all meeting notices are sent to local and regional news organizations. In addition, all information is available to the public in the two repositories at the Ravenna and Newton Falls Public Libraries. Information is also available on the internet at www.RVAAP.org

THE ISSUE

1. What is the issue?

Ohio Army National Guard has requested that the Army remove the buildings in the production areas so the sites can be transferred to them and developed for training.

After 60 years of operation, some of the buildings at the Ravenna Army Ammunition Plant (RVAAP) have explosives in the walls and under the floors. Some of the buildings have polychlorinated biphenyl (PCBs) above the regulated levels of 50 parts per million (ppm) in the remaining paint on the walls.

The remaining explosives must be removed from the buildings before using heavy equipment to demolish them because the force of the equipment could cause an accidental explosion resulting in injury or death.

Thermal treatment of the buildings (engineered burn) is the only proven method to safely remove the explosives from inaccessible areas within the buildings

To hold an engineered burn where PCBs above 50 ppm are involved, RVAAP is required to obtain approval from Federal, State and Local environmental agencies.

The Army will ensure that the project complies with all State and Federal laws and requirements.

THE PROJECT

Consistent with the environmental restoration of the Ravenna Army Ammunition Plant, the Army has prepared a risk assessment for the proposed test burn of Load Line 11 with PCBs in paint to evaluate the effects of the burn on human health.

2. What is the status of the project?

RVAAP sent the plan for the trial burn of the buildings in Load Line 11 to the USEPA on January 7, 2005 for review. The plan was developed under the agencies direction.

The plan evaluates whether the emissions from the burning of the buildings with regulated PCB paint would cause any unreasonable risk to the people's health in the nearby communities.

The Army continues to evaluate the explosive hazards in the buildings and continues to search and evaluate methods for demolition in order to reduce the number of buildings that require burning.

The RVAAP contractor has removed all hazardous materials from Load Line 11 where it could safely be done without endangering workers from an accidental explosion. This includes paint chips and animal debris from the floor, the light ballasts with PCBs, mercury light bulbs and the asbestos transite roofing/siding.

3. Are there other methods to remove the explosives and were they evaluated?

YES – other methods to remove the explosives and/or strip the paint were considered and are discussed in the summary document sent to the USEPA. The Army determined that the other methods were unsafe because they potentially introduce heat, shock or friction which could set off an accidental explosion.

4. What agencies/organizations are involved in reviewing the engineered burn plan and making sure it is safe for the public?

The Army discovered PCBs in paint in some of the buildings and notified the USEPA on September 26, 2002.

RVAAP will continue to involve the following agencies throughout the project:

- *The USEPA is responsible for regulating PCBs in Ohio. The agency regulates all PCBs equal to or greater than 50 ppm. The USEPA will determine whether the Trial Burn at Load Line 11 will meet the strict criteria of “No Unreasonable Risk” to human health or the environment as cited in the PCB regulations.*
- *The Ohio EPA and Akron Regional Air Quality Management District (Akron Air) will also evaluate the project and decide whether or not to issue the burn permits.*
- *The Agency for Toxic Substances and Disease Registry (ATSDR) has been contacted and is assisting the public by providing an independent review of the project including risk assessment and modeling.*
- *The Portage County Health Department was initially briefed on this project in the summer of 2002 RVAAP will continue work closely with the agency to do so as this process moves along*
 - *The Ravenna Army Ammunition Plant Restoration Advisory Board is briefed on all environmental issues at the Ravenna Army Ammunition Plant.*
 - *The US Army Technical Center for Explosive Safety (USATCES) and the Department of Defense Explosive Safety Board (DDESB) reviews and approves all explosive operations.*

THE BURN PLAN

The Army has proposed to burn the buildings to make them safe from explosives during demolition. In order to do this, dunnage (clean scrap pallets) must be brought in to provide enough heat to get rid of the residual explosives.

5. Why is the current plan only looking at the risk of burning buildings with PCBs in the paint?

- *This project is being completed in steps. The first step is to evaluate the risk to the adults and children of burning paint with PCBs.*
- *If the USEPA approves this plan, then the next step will be to develop an air monitoring and sampling plan for review and approval by the USEPA and Akron Regional Air Quality Management District (Akron Air).*
- *The locations of air monitoring stations will be discussed and determined by the agencies involved and the Army. The location of the air monitoring stations could be either on or off of the RVAAP. No decisions have been made yet on the number of monitoring stations or the number of pollutants being tested.*
- *The plan submitted to the USEPA already includes critical information such as the weather data for the past five years, the location and size of all of the Load Line 11 structures (16930 sq. ft. of building with PCB's and explosives), the topography, trees, and water bodies that could affect air dispersion, and the location of homes around the Army Ammunition Plant.*
- *Again, any and all actions would need to have US EPA approval and comply with all regulations for any action to take place. Thus, the Army is ensuring that people's health and the environment are being protected.*

6. What is dunnage and where does RVAAP get it? What are scrap pallets?

Dunnage is a word used by the Army for scrap wood that in this situation will be used to assist with the burning process.

Dunnage, which has already been used, was purchased locally from pallet companies with the strict instructions that all wood must be clean, free of dirt and stains and must be untreated. Any loads not meeting this criteria were rejected. Some companies did not provide pallets because they could not provide a schedule for delivery.

Scrap pallets are the same wood as the regular pallets; they just have been broken apart. The scrap pallets had to meet the same rules as the complete pallets.

To date, no pallets have been loaded into the buildings in Load Line 11.

7. Can testing be done on this paint by burning some of it under controlled conditions in a lab, and measure any potential emissions?

This option was discussed with the USEPA. The difficulty is in reproducing the field conditions in the laboratory so that the data means something. If the lab conditions aren't exactly the same as the outside burning conditions, then the data would be inaccurate. For this initial effort in evaluating the project, the USEPA recommended the risk model to assess the engineered burn of PCBs in paint.

8. Is an engineered burn followed by demolition the cheapest way to remove these structures?

No – The effort required to set up the engineered burn, coordinate with the Ravenna Fire Department, sheriff, highway patrol, county health departments, the Federal Aviation Administration (FAA) as well as the media is lengthy and expensive. It requires as much time to complete the engineered burn as it does to complete the building demolition.

9. How long does the burn last once it is started?

If the weather conditions and forecast are appropriate, the burn will last 2-3 hours with the majority of the burn taking approximately 1 hour. The burn permit requires that the fire must be out or extinguished before sunset on the same day. The Ravenna Fire Department is onsite during the entire burn. RVVAP then conducts a 72-hour fire watch following the completion of the burn.

10. What explosives were used in Load Line 11?

Although several different explosives and propellants were handled at the Ravenna Army Ammunition Plant, only black powder, lead azide and tetryl were used at Load Line 11. Not all explosives were handled in every building or every load line. For example, TNT was only handled in the melt pour lines (Load Lines 1-4 and 12).

PREVIOUS BURNS

11. Was the public made aware of the engineered burns of Load Line 6 and Load Line 9 in 2002?

YES - In addition to the three separate briefings to the RAB about the planned engineered burns, the Army and its contractor held a full day briefing for all of the local agencies including the Ohio EPA's Division of Emergency and Remedial Response, Air Division, Hazardous Waste Division, the Portage County Health Department and Akron Air. Also the Army had 6 separate briefings and coordination meetings with the Ravenna Fire Department. A Media Day was held a week before the engineered burns with television, newspaper and radio coverage from all of the major Cleveland, Akron, Youngstown providers as well as local media.

12. What was done with the material (brick, concrete, steel and ash) from the Load Line 6 & 9 engineered burns?

For Load Line 6 and 9 only the buildings with PCBs in paint less than 50 ppm were burned. All lights, ballasts, transite and floor debris were properly disposed of prior to the burn.

Following the burn, the ash was tested, collected and disposed of offsite in accordance with the local state and federal regulations. The steel was recycled and the brick and block were crushed for use as road bed materials. No contaminated materials were spread around the Army Ammunition Plant.

13. Why didn't the Army or their contractor attend the last two meetings held in Paris Township, (January 26, 2005 and March 2, 2005)?

On both occasions, neither the Army nor their contractor was invited to the meetings. The Army is willing to attend meetings and willing to be involved in an open exchange of information. Currently,

the Army is being proactive by holding meeting with those who are interested in hearing about the plans at RVAAP.

14. What is the current list of media which are notified concerning RAB meeting agendas, media events, informational sessions, etc.?

The current list of media contacts include:

WFMJ – Youngstown
WKBN – Youngstown
WYTV – Youngstown
WKYC – Cleveland
WOIO – Cleveland
WEWS – Cleveland/Akron
WQHS – Parma
WVIZ – Akron

WUAB – Akron
WVPX – Akron
WJW – Cleveland
The Tribune Chronicle – Warren
The Record Courier – Ravenna
The Plain Dealer – Cleveland
The Akron Beacon Journal – Akron
The Vindicator - Youngstown

The point of contact for the RVAAP is:

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