

HOLSTON ARMY AMMUNITION PLANT





Version Number 1 08 MAY 2024













AGENDA

- Welcome, Introductions, Opening Comments
- Emergency Response Drills
- Open Burning of Production Waste Alternatives
- Waste Diversion
- PFAS
- Regulatory Inspections
- Questions and Discussion



2



INTRODUCTIONS

U.S. Army

LTC Joel Calo

Commander
Holston Army Ammunition Plant

Laura Peters

Environmental Engineer Holston Army Ammunition Plant

Justine Barati

Director of Public and Congressional Affairs
Joint Munitions Command

BAE Systems

Skip Proffitt

Environmental Manager Holston Army Ammunition Plant



LTC Joel Calo



OPENING COMMENTS

Thank you to our community partners for recent and upcoming preparedness and planning activities, exercises, and celebrations

April 2024:

 Large scale high angle, confined space rescue exercise with local community responders (FEMA, TEMA, & EMA)

July 2024:

Support Mount Carmel Independence Day celebration

August 2024:

Change of Command Ceremony



4



HSAAP "EMERGENCY RESPONSE DRILLS"

U.S. ARMY

- Mutual Aid emergency response exercise is required annually. Holston Army Ammunition Plant (HSAAP) conducted full-scale structural, high angle, confined space, and trench rescue exercises. Many other areas throughout the facility increased the number of building evacuation drills.
- In these simulations, it is all hands-on deck. A complex scenario was used to test the organization's ability to develop a planned response, employ staff and resources, and coordinate with key internal and external players to engage a comprehensive response to a larger scale emergency incident.
- While no amount of planning can prevent an event or hazard from affecting an organization, emergency preparedness simulation provides opportunities to minimize loss and disruption through preparation with the goal of keeping HSAAP, their families, and communities safe.

















LTC Joel Calo



EXPLOSIVES CONTAMINATED WASTE DISPOSAL

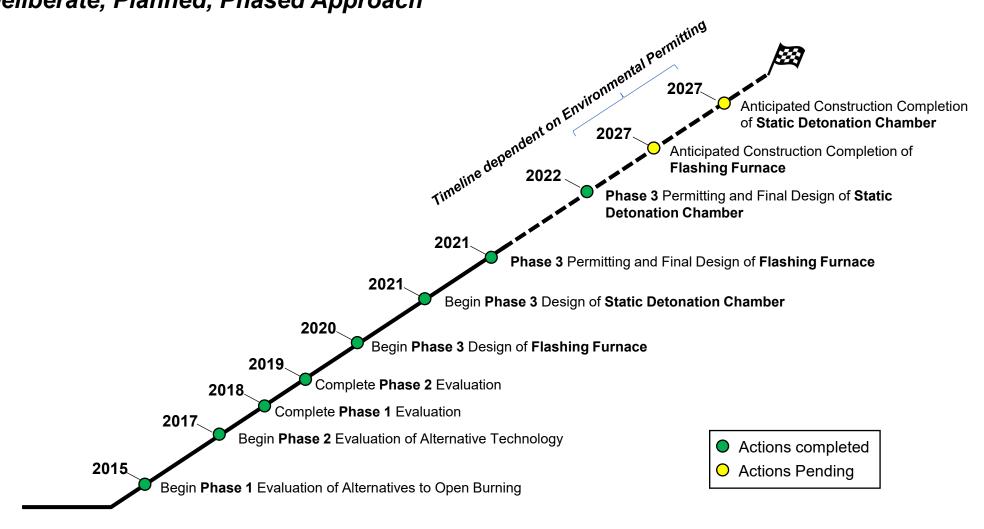
- HSAAP open burns explosives contaminated materials in permitted burn piles and burn cages as the primary means of disposal.
- HSAAP implemented a waste diversion program between 2019-2021 as a result of updated safety instructions. (Next Topic)
- We continue the emphasis on the waste diversion program rolled out in 2019-2021, this has led to a significant reduction in OB of contaminated waste.
- Very few pile burns annual or semi-annual burn pile events. Last burn conducted Feb. 13. Extinguished smoldering Feb.15.
- HSAAP is pursuing a flashing furnace to significantly reduce open burn of contaminated waste.
- All contract actions to support flashing furnace construction are awarded. Permitting is key.





OPEN BURNING ALTERNATIVE TECHNOLOGY DEVELOPMENT

Deliberate, Planned, Phased Approach



Permitting is the schedule driver





OPEN BURNING ALTERNATIVES: FLASHING FURNACE



Bottom line up front - hazardous waste (RCRA) permitting is the schedule driver for both facilities.

- Hazardous waste & air construction permit applications submitted May 2022.
- Air construction permit issued August 2022.
- Material handling building construction nearly complete.
- Construction crew demobilization.
- Hazardous waste permit application still under review.







DISPOSAL OF WASTE EXPLOSIVES

- HSAAP open burns explosives that can no longer be used.
 Burn pans are the primary means of disposal.
- Prior to disposal, off-specification explosives are evaluated for re-manufacturing or re-use into other products.
- Burn events occur 1-3 times per week.
- HSAAP is pursuing static detonation chambers (SDCs) to significantly reduce open burn of waste explosives.
- All contract actions to support construction of the SDCs are awarded. Permitting is key.





OPEN BURNING ALTERNATIVES: STATIC DETONATION CHAMBER

Bottom line up-front hazardous waste (RCRA) permitting is the schedule driver for both facilities.

- Hazardous waste & air construction permit applications submitted Dec 2022.
- Air construction permit issued 3/20/23.
- Design-build contract awarded 3/30/23.
- Tree clearing completed.
- Basic site preparation to begin in May 2024.



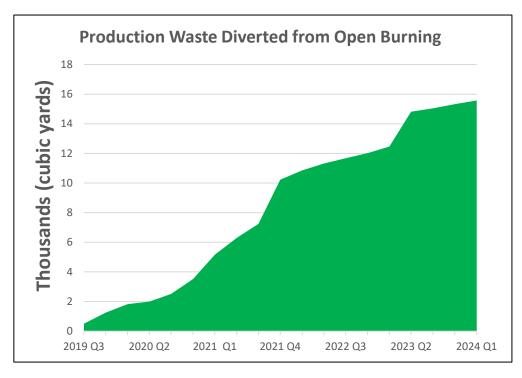






WASTE DIVERSION PROGRAM BEST PRACTICE

- The Waste Diversion Program was fully implemented in 2021 to divert materials from open burning (OB).
- Because of the safety implications of explosive material management, a phased and deliberate process was implemented starting in 2019.
- A collaborative team of safety, environmental, materials handling, and explosive production personnel established an effective program that allowed for the large-scale diversion of waste from open burning.
- The average weight of explosives contaminated material burned since 2017 has been reduced by approximately 75%.
- More than 15,500 cubic yards of production waste diverted from open burning since program was initiated.









Skip Proffitt



PFAS UPDATES

PFAS: Per- and Polyfluoroalkyl Substances

- Chemicals used in the manufacturing processes at HSAAP do not use the 196
 PFAS containing compounds of concern released by the EPA. However, we will continue to monitor the EPA list of PFAS compounds of concern.
- PFAS Site Inspection report completed in Fall 2023.
- Results indicate primarily low detections near the screening values. A Remedial Investigation will be completed for areas of interest.
- Drinking water is supplied by City of Kingsport.

The report is available at local libraries and at https://aec.army.mil/PFAS/TN/HSAAP





REGULATORY INSPECTIONS SUMMARY: 2023-2024 YTD

Date	Agency	Inspection	Outcome
April 25, 2023 August 21, 2023 November 13, 2023 January 30, 2024 May 2, 2024	Tennessee Department of Environment and Conservation	Quarterly CY2023 & CY2024 YTD Class II Landfill Compliance Inspections	Compliant
November 13, 2023 May 2, 2024	Tennessee Department of Environment and Conservation	CY2023 & CY 2024YTD Semi-annual Post-closure landfill inspections	Compliant
June 8, 2023	Environmental Protection Agency	TSCA Inspection (PCBs)	Compliant
September 13-14, 2023	Tennessee Department of Environment and Conservation/ Environmental Protection Agency	RCRA Hazardous Waste Inspection	4 non-compliances noted
September 26,– November 3, 2023	Tennessee Department of Environment and Conservation	NPDES Wastewater & Stormwater Compliance Inspection	Report Pending
October 11 – November 2, 2023	Tennessee Department of Environment and Conservation	Annual Title V Air Compliance Inspection	Minor Finding of Non-compliance

Date	Registrar	Audit	Outcome
December 13 - 27, 2023	Lloyd's Registrar	ISO 50001 (Energy) Surveillance Audit	Recommended for continued certification
November 6 - 8, 2023	NFS International	ISO 14001 (Environmental Management System) Re-certification Audit	Re-certified



Skip Proffitt 13



NON-COMPLIANCE SUMMARY

Focus Areas

- Visible cracks and peeling coating on secondary containment at 2 locations.
 - One has been repaired
 - Out of service and will be repaired if needed.
- Scrubber recirculation rates below limit
 - Conducting Root-Cause Analysis

Administrative Issues/Paperwork Problems

- Steam Balance Reporting.
- · Error on annual report.
- · Labeling deficiency at the waste storage area.
- · Missing documentation of regulatory applicability
- · Failure to provide written notification on construction start.
- Late Boiler Tune-ups
- · Missing temperature calibration
- · Visible Emissions Evaluation performed late.



Skip Proffitt 14



INFORMATION IS AVAILABLE

Our commitment to responding to your questions doesn't end tonight. Resources exist for you to research information on your own or ask questions of our team.

RESOURCES

Facebook: Like us at Holston Army Ammunition Plant

Homepage: http://www.jmc.army.mil/installations.aspx?id=Holston

Justine Barati

Director of Public & Congressional Affairs Joint Munitions Command (309) 782-7649 justine.a.barati.civ@army.mil www.jmc.army.mil

Laura McLaughlin

Communications Manager, BAE Systems, Inc. (571) 867-1217
Laura.McLaughlin@baesystems.us
www.baesystems.com



Justine Barati 15



HOLSTON ARMY AMMUNITION PLANT



