

Camp Minden M6 Destruction

Attachment B-1

April 9, 2015 Request for Clarification and
Response dated April 10, 2015

Clarification
Camp Minden M6 Disposal

Reference the Louisiana Military Department's request for quotes under Emergency Response Procedures, Camp Minden M6 Disposal. Request the Proposer verifies that their quote (attached) submitted March 18, 2015, is for the:

The complete removal, destruction, disposal and site remediation actions of the following materials and packing material currently stored at the Camp Minden Site to include: 1) approximately 15,687,247 pounds of M6 propellant; and 2) approximately 320,890 pounds of CBI. The Proposer's quote shall include all labor, materials, equipment, utilities, permits, licenses, security, and associated actions to complete all Work.

Specifically, but not all inclusive, that the listing of items below are included in your quote.

- **SETTLEMENT AGREEMENT REQUIREMENTS**, see description below.
- **INSURANCE**, see description below.
- **PERFORMANCE BOND**, see description below.
- **MATERIAL WEIGHT VERIFICATION METHODS & DOCUMENTATION**
- **MONITORING:**
 - Specify type monitoring _____
 - Specify number of monitors / stations _____
- **COMMUNITY INVOLVEMENT**, Proposer shall support community involvement efforts consistent with the EPA Superfund Community Involvement Handbook. Support may include but not be limited to factsheet preparation and distribution, PowerPoint presentations. http://www.epa.gov/superfund/community/cag/pdfs/ci_handbook.pdf

Proposer shall indicate below any costs not identified in the original proposal.

<u>Items</u>	<u>Cost</u>
_____	_____
_____	_____
_____	_____
_____	_____

Please re-confirm your quote for both the CONTAIN BURN SYSTEM PRICE PROPOSAL AND ADDITIONAL POLLUTION ABATEMENT OPTIONS to reflect any changes based on this request for clarification.

Proposer: _____

Signature of Proposer: _____

Date: _____

April 9, 2015

Clarification
Camp Minden M6 Disposal

Note:

- a. The Louisiana Military Department reserves the right to make this "Clarification" action a contractual obligation if a contract ensues.
- b. For the purposes of this Clarification any reference to the words "Contractor" or "Sub-contractor" shall be substituted with the words "Proposer" or "Proposer's workers"

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Clarification
Camp Minden M6 Disposal

1. SETTLEMENT AGREEMENT REQUIREMENTS

The Louisiana Military Department desires to achieve the total removal action and all associated site clean-up activities as directed by or included in the Administrative Settlement Agreement and Order on Consent ("Settlement Agreement") CERCLA Docket No. 06-08-14 entered into voluntarily by the United States Environmental Protection Agency ("EPA"), the Louisiana Military Department ("Settling Respondent" or "Military Department"), Louisiana Department of Environmental Quality (LDEA), and the United States Department of the Army ("Army" or "Settling Federal Agency") and all other applicable laws and regulations. The Louisiana Military Department desires to have on its behalf a Proposer to perform the below which includes but is not limited to:

- a) Page 10: Proposer shall generate and provide a Work Plan that includes, but is not limited to staffing requirements and limitations, travel/mobilization costs and requirements, necessary equipment as well as availability/limitations of necessary equipment required and available materials, the proposed disposition method, total and itemized cost, and duration for each phase, and timeline/schedule.
- b) Page 10: Proposer proposed Work Plan shall reflect compliance with State and Federal statutory requirements. Respondent shall provide their process for ensuring compliance with State and Federal statutory requirements.
- c) Page 10: Proposer shall establish procedures to determine the priority of removal of the materials listed.
- d) Page 10: Proposer shall prepare a Spill and Emergency Response Contingency Plan.
- e) Page 10: Proposer shall verify and provide the availability of licensed and experienced personnel that will be available.
- f) Page 12: Proposer shall submit to LMD for EPA approval Work Plan for performing the removal action.
- g) Page 12: Proposer shall submit to LMD for EPA review and comment a Health and Safety Plan.
- h) Page 13: Proposer prior to commencement of any monitoring project under this Settlement Agreement, shall submit to LMD for EPA approval a Quality Assurance Project Plan.
- i) Page 14: Proposer shall submit a proposal for Post Removal Site Control. Upon EPA approval, shall conduct Post Removal Site Control activities.
- j) Page 15: Proposer may ship hazardous substances, pollutants and contaminants from the Site to an off-site facility only if they comply with Section 121(d) (3) of CERCLA, 42 USC 9621(d)(3).
- k) Page 15: Proposer shall submit to LMD for EPA review and approval a final report summarizing the actions taken to comply with the Settlement Agreement.
- l) Page 19: Proposer must retain, and instruct its workers and agents to preserve, all records for ten years.
- m) Page 20: Proposer shall identify ARARs in the Removal Work Plan subject to EPA approval.
- n) Page 23: Proposer shall submit a Six Month Work and cost progress Report.
- o) Not required by the Settlement Agreement, but the Work Plan must comply with DOD 4145.26.

Clarification
Camp Minden M6 Disposal

2. INSURANCE

Contractor will be required to provide the State of Louisiana with Certificates of adequate insurance indicating coverage required, *(in accordance with the INSURANCE – Attachment hereby incorporated into this “Clarification Items”)*. Insurance requirements shall extend to all of the Proposer’s Subcontractors.

3. PERFORMANCE BOND

Contractor shall provide a PERFORMANCE BOND (SURETY BOND) IN THE AMOUNT OF 100% OF THE CONTRACT AND ANY AMENDMENTS OR CHANGE ORDERS to the same to insure the successful performance under the terms and conditions of the Contract. The performance bond shall be written by a surety or insurance company currently on the U.S. Department of the Treasury Financial Management Services list of approved companies which is published annually in the Federal Register, or by a Louisiana domiciled insurance company with at least an A-rating in the latest printing of the A.M. Best’s Key Rating Guide to write individual bonds up to 10 percent of policyholder’s surplus as shown in the A.M. Best’s Key Rating Guide or by an insurance company that is either domiciled in Louisiana or owned by Louisiana residents and is licensed to write surety bonds.

No surety or insurance company shall write a performance bond which is in excess of the amount indicated as approved by the U.S. Department of the Treasury Financial Management Service list or by a Louisiana domiciled insurance company with an A-rating by A.M. Best up to a limit of 10 percent of policyholders’ surplus as shown by A.M. Best; companies authorized by this Paragraph who are not on the treasury list shall not write a performance bond when the penalty exceeds 15 percent of its capital and surplus, such capital and surplus being the amount by which the company’s assets exceed its liabilities as reflected by the most recent financial statements filed by the company with the Department of Insurance.

The performance bond is to be provided within 10 working days from request. Failure to provide within the time specified may cause your offer to be rejected.

In addition, any performance bond furnished shall be written by a surety or insurance company that is currently licensed to do business in the state of Louisiana.

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April 9, 2015

Clarification
Camp Minden M6 Disposal

Reference the Louisiana Military Department's request for quotes under Emergency Response Procedures, Camp Minden M6 Disposal. Request the Proposer verifies that their quote (attached) submitted March 18, 2015, is for the:

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Specifically, but not all inclusive, that the listing of items below are included in your quote.

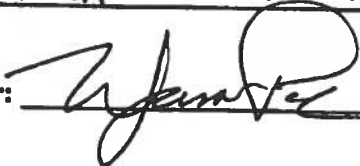
- SETTLEMENT AGREEMENT REQUIREMENTS, see description below.
- INSURANCE, see description below.
- PERFORMANCE BOND, see description below.
- MATERIAL WEIGHT VERIFICATION METHODS & DOCUMENTATION
- MONITORING:
 - Specify type monitoring Single Source Stack monitoring
 - Specify number of monitors / stations 1 - with available options
- COMMUNITY INVOLVEMENT, Proposer shall support community involvement efforts consistent with the EPA Superfund Community Involvement Handbook. Support may include but not be limited to factsheet preparation and distribution, PowerPoint presentations. http://www.epa.gov/superfund/community/cag/pdfs/ci_handbook.pdf

Proposer shall indicate below any costs not identified in the original proposal.

<u>Items</u>	<u>Cost</u>
<u>n/A</u>	<u>n/A</u>
_____	_____
_____	_____
_____	_____

Please re-confirm your quote for both the CONTAIN BURN SYSTEM PRICE PROPOSAL AND ADDITIONAL POLLUTION ABATEMENT OPTIONS to reflect any changes based on this request for clarification.

Proposer: William "Jason" Poe

Signature of Proposer: 

Date: 4-10-15

CONTAIN BURN SYSTEM PRICE PROPOSAL

PHASE-1 MOBILIZATION & SITE PREPARATION				
Item	Designation	Unit of Issue	Unit Price	Total Price
001	Pre-mobilization Includes: Permitting, Licensing, Ordering, Training & Reporting	Lump Sum	\$220,547	\$220,547
002	Mobilization and Site Ancillary Setup Includes: Environmental, Site Work, Construction & Magazine	Lump Sum	\$736,412	\$736,412
003	Supply of Turnkey Contained Burn System with Basic Pollution Abatement System (PAS) <u>Inciudes:</u> Site Specific Design, Civil & Electrical Infrastructure Thermal Treatment Chamber & Loading System, PAS Valve, Air, Instrumentation & Power Distribution Equipment Controls (HMI, PLC, MCC) & CCTV System Installation & Systemization Initial Stack Testing (up to 1 week) <u>BASIC PAS:</u> Cyclone, Gas Cooler Heat Exchanger, Baghouse, ID Fan, All Ductwork & Stack	Lump Sum	\$7,713,145	\$7,713,145
Total Phase-1 Cost			\$8,670,104	

PHASE-2 REMOVAL & DISPOSAL OPERATIONS				
Item	Designation	Unit of Issue	Unit Price	Extended Price
005	M6 Propellant - 15,700,000 lbs.	Unit Cost/lb.	\$0.90/lb.	\$14,130,000
006	Clean Burning Igniter - 320,000 lbs.	Unit Cost/lb.	\$0.51/lb.	\$163,200
Total Phase-2			\$14,293,200	

PHASE-3 SITE RESTORATION & DEMOBILIZATION				
Item	Designation	Unit of Issue	Unit Price	Total Price
007	Environmental, Site Recovery & Restoration	Lump Sum	\$394,643	\$394,643
008	Final Reporting and Project Closeout	Lump Sum	\$81,000	\$81,000
Total Phase-3			\$475,643	

TOTAL PROJECT	\$23,438,947
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CONTAINED BURN SYSTEM PRICE PROPOSAL OPTIONS

ADDITIONAL POLLUTION ABATEMENT OPTIONS			
Option 003 -01	<p align="center">ADVANCED PAS: <u>Includes:</u> High Temp. Afterburner, Heat Exchanger SNCR system (NOX reduction), Ductwork & Controls</p>	Lump Sum	\$2,872,497
Option 003 -02	<p align="center">BEST AVAILABLE PAS* <u>Includes:</u> SCR system for NOx Reduction, HEPA, Ductwork & Controls</p>	Lump Sum	\$1,327,000
Option 004	<p align="center">BASIC CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS)** <u>Includes:</u> Sample Probe, Pumps, Lines, Purge System, Shelter, Cal. Valve Panel, Gas Conditioner, Factory Test, Cal. Gas System, O2 Analyzer, & CO Analyzer</p>	Lump Sum	\$342,375
Option 004-01	<p align="center">CEMS NOx Analyzer, Cal. Gases, Spare Parts</p>	Lump Sum	\$22,550
Option 004-02	<p align="center">CEMS THC Analyzer, Cal. Gases, Spare Parts</p>	Lump Sum	\$27,115
Option 004-03	<p align="center">CEMS Stack Flow Meter</p>	Lump Sum	\$31,900

Pollution abatement and CEMS options above are in addition to proposed cost on previous page.

* Best Available PAS (Option 003-02) is priced in addition to the Advanced PAS (Option 003-01) option.

** Basic Continuous Emission Monitoring System (Option 004) can be added to any of the three proposed PAS packages. Additional, CEMS options (004-01, 02 & 03) can be included to the Basic CEMS (Option 004) accordingly.

Camp Minden M6 Destruction

Attachment B-2

April 30, 2015 Request for Clarification and
Response dated May 4, 2015



BOBBY JINDAL
GOVERNOR

State of Louisiana

LOUISIANA NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
6400 St. Claude Avenue
Jackson Barracks
New Orleans, LA 70117

GLENN H. CURTIS
MAJOR GENERAL
THE ADJUTANT GENERAL
(504) 278-8357
FAX (504) 278-8210

April 30, 2015

Explosive Service International
Mr. William T. "Billy" Poe
9985 Baringer Foreman Road
Baton Rouge, Louisiana 70809

Ref: Camp Minden M6 Disposal

Dear Vendor:

Thank you for submitting a quote on March 18, 2015 for the Emergency Response action concerning Camp Minden M6 Disposal and the Clarification on April 10, 2015.

We request that you review the enclosed Technical Comments dated April 28, 2015 and provide a second "Clarification" to confirm your quote for the **Contained Burn System Proposal**. Request you identify for each Technical Comment: whether that item is included in your quote and to what extent; indicate which items are not included in your quote and state any additional costs; and/or state any information you need in order give a Clarification. You have the option to clarify the Community Involvement Plan bullet item. I would like your written response no later than 5:00 p.m. Monday, May 4, 2015. To meet the suspense, the response can be sent via e-mail to owen.w.monconduit.nfg@mail.mil with the original sent to:

Louisiana Military Department
Deputy Director, Contracting and Purchasing
Brigadier General (Ret) Owen Monconduit
718 E Street, Camp Beauregard
Pineville, Louisiana 71360

We request that you keep this memorandum confidential. The Louisiana Military Department has instituted a "Blackout" period for this procurement. This memorandum does not create any intent or commitment by the Louisiana Military Department (State) to the Proposer other than clarification to your quote. The Louisiana Military Department reserves the right to make this "Clarification" action a contractual obligation if a contract ensues.

Any questions that you have about this correspondence should be directed to the undersigned at 318-641-5396.

Sincerely,

Owen W. Monconduit
Brigadier General (Ret) Louisiana Military Department
Deputy Director, Contracting and Purchasing

encl



Corporate Office
9985 Baringer Foreman Rd.
Baton Rouge, LA 70809

May 4, 2015

Brigadier General (Ret) Owen Monconduit
Deputy Director Contracting and Purchasing
Louisiana Military Department
718 E Street, Camp Beauregard
Pineville, LA 71360

Ref: Contained Burn System Proposal – Response to Technical Comments dated April 28, 2015

Dear Sir,

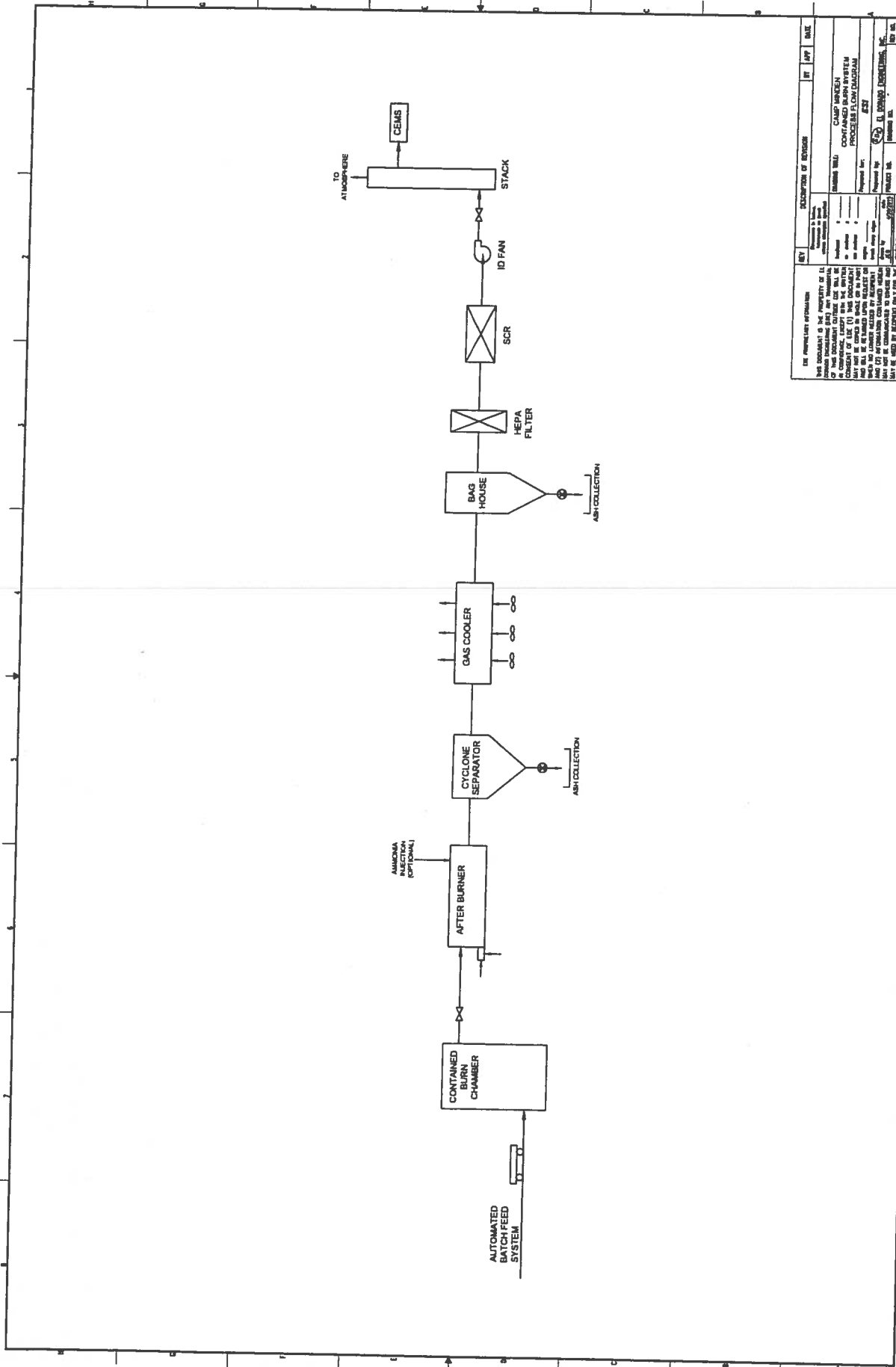
Please find enclosed Explosive Service International's response to the above referenced request pertaining to our Contained Burn System Proposal. Included with the response is a process flow diagram detailing the individual components of the air pollution control equipment (APCE).

If you have any questions or need additional information please let us know. We look forward to working with the Louisiana Military Department to safely and efficiently resolve this problem at Camp Minden.

Sincerely,
Explosive Service International

A handwritten signature in black ink, appearing to read 'W. Jason Poe'.

W. Jason Poe
Vice President
jpoe@explosiveserviceintl.com
ofc: (225) 275-2152
cell: (225) 247-1771



REV	DESCRIPTION OF REVISION	BY	APP	DATE
1	DESIGN			

THIS DOCUMENT IS THE PROPERTY OF IT COMPANY. IT IS TO BE KEPT IN THE OFFICE OF THE PROJECT ENGINEER. IT IS TO BE RETURNED TO THE PROJECT ENGINEER UPON COMPLETION OF THE PROJECT. IT IS NOT TO BE REPRODUCED OR COPIED IN ANY MANNER WITHOUT THE WRITTEN PERMISSION OF IT COMPANY.		PROJECT NO. SHEET NO.
THE INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE. DATE OF DECLASSIFICATION IS INDEFINITE.		PROJECT NO. SHEET NO.

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TECHNICAL COMMENTS
CAMP MINDEN
M-6 and CBI DESTRUCTION TECHNOLOGY
April 28, 2015
Response May 4, 2015

Engineering Description of Combustion Units: Provide a complete engineering description of the unit which will include: (a) Process flow diagram of the entire combustion unit including all Air Pollution Control Equipment (APCE), (b) Engineering description of each equipment including combustion chambers and APCE, (c) Process monitoring and Instrument Control System, and (d) Automatic Waste Feed Control (AWFCO) System.

Response:

All are included in the quotation

- a) See attached process flow diagram with all options shown
- b) Provided in proposal, please clarify what additional detail is requested
- c) Provided in proposal, please clarify what additional detail is requested. Detailed P&ID's will be provided after contract award.
- d) The feed system is automatically controlled, with interlocks, to ensure that a load cannot be fed into the system unless the entire system, including the APCE is functioning correctly, within prescribed parameters. If there is a deviation in operations so that the system, including the APCE, is operating outside of set limits, the automated feed system is locked out, so waste material cannot be fed.

Performance Test: The quote states that a performance test will be conducted. Detailed information on the testing is required which should include: (a) Target Operating Parameter Limits (OPLs) for each equipment and combustion chambers, (b) Waste feed characteristics including any spiking, (c) Selection of Principal Organic Hazardous Constituents (POHCs) for demonstration of DRE, (d) System operation to achieve steady state, (e) Test runs protocol; minimum three runs under identical operating conditions (OPLs, minimum combustion chambers temperatures, maximum waste feed limits for each type of waste, stack gas flow rate, etc.), (e) Continuous Emissions Monitoring System (CEMS) for CO, THC, NOx, Oxygen and stack gas flow meter, and (f) Sampling and Analysis Plan for the wastes, stack emissions and solids residuals.

Response:

All are included in the quotation

A performance test will be conducted and all required details can be provided as part of the performance test plan after award. Several options have been provided in the proposal and the final performance test plan and OPLs, will depend on which options are selected at time of award, as well as being subject to review and approval by state regulatory authorities.

Anticipated detailed information is outlined in brief below:

- a) Target OPLs will include system (APCE) Temperatures and Pressures:

- i. Afterburner Temperature
 - ii. Gas Cooler Outlet Temperature
 - iii. Baghouse Inlet/Outlet Temperature
 - iv. SCR Inlet/Outlet Temperature
 - v. Baghouse dP
 - vi. HEPA dP
 - vii. Stack Flow Rate
- b) Waste Feed will be actual M6 and CBI material operated under normal operating conditions – no additional spiking is anticipated
 - c) To be finalized with state regulatory authorities, expected to consist of: dinitrotoluene, dibutylphthalate, and diphenylamine
 - d) System will be operated under normal conditions during performance test. Startup to achieve steady state will include startup of afterburner and APCE system, with a warm-up period sufficient to reach steady state operating temperatures in the APCE system.
 - e) These are all quoted as priced options in the proposal they will be demonstrated during the Performance Test, as applicable
 - f) The Sampling and Analysis Plan will be prepared to meet the State regulatory authorities' requirements

Work Plan: The work plan should also include supporting plans including: (a) Operation during initial shakedown phase, (b) Quality Assurance Project Plan, (c) CEMS Performance Evaluation Plan, (d) Startup, Shutdown and Malfunction Plan, and (e) Contingency Plan per the Administrative Order on Consent.

Response:

All are included in the quotation and will be submitted with the work plan.

Test Results: A report with the results of the performance test will be submitted which will include, at minimum: (a) Field and process data including CEMS and all operating parameters, (b) Field sampling and laboratory analyses results, (c) Calculation of Destruction and Removal Efficiency (DRE) for the POHCs, (d) Emissions calculations and demonstration of compliance with applicable Clean Air Standards under NESHAP Maximum Achievable Control Technology and under MACT EEE (CO, THC, Dioxins/Furans, and Particulate Matter) and for NO_x, and (f) Proposed Operating Parameters Limits (OPLs) for the entire combustion operations and the APCE.

Response:

All are included in the quotation.

Periodic Stack Sampling and Analyses: In the work plan, please include periodic sampling/analyses of dinitrotoluene, dibutylphthalate, and diphenylamine.

Response:

Initial stack testing (including the above constituents) is included in the quotation as part of the commissioning of the contained burn chamber. Please clarify the period frequency if any additional testing is required.

Pollution Control Equipment: The quote outlined optional pollution control equipment. To meet concerns over volatile organic compounds and maximize the destruction of material, the system should include an afterburner. In addition, to achieve maximum NOx reductions, the combustion unit should include a Selective Catalytic Reduction System. Furthermore, the unit must also include CEMS to measure CO, THC, NOx, O2 and stack gas flow rate.

Response:

Noted; all are included in the quotation.

Environmental Monitoring/Sampling: As in the AOC, LMD must develop a Quality Assurance Sampling Plan for the collection of environmental data prior to, during and post operations. During the operation phase, meteorological and environmental data should be collected at the destruction unit on a continuous basis and posted real time for public viewing. There should be the capability to routinely sample/analyze the various media for the constituents associated with M6 & CBI propellant (i.e., dinitrotoluene).

Response:

Noted; Quality Assurance Sampling Plan is included in the quotation and will be submitted to include the above upon award of the contract.

Community Involvement Plan: Develop a Community Involvement Plan to keep the community involved throughout the process and establish a community information center for face-to-face information exchange with the public.

Response:

Noted; included in quotation

~~ESI understands the importance of communication to the community as it relates to this projects and will establish a community relations officer to work in conjunction with the LMD and EPA for the duration of the project. ESI will provide a community involvement plan to the LMD and EPA for approval. Monthly public meetings will also be conducted to inform the community of our progress and conduct face to face information exchanges. These public meetings will be coordinated through the LMD and EPA. Please clarify if any additional information is required.~~

Reply clarified in response to LMD from ESI on June 1, 2015.

Magazine Priority: The quote included an insightful analysis of the priority of the magazines. EPA encourages the Vendor to reevaluate and update that priority based on such information contained in the March 2015 Explosive Safety Technical Assistance Visit Report. In that Report, the compromised CBI was recommended to be prioritized.

Response:

Noted; included in quotation.

During the mobilization phase of the project, ESI will conduct magazine assessments to establish real-time conditions of the M6 and CBI in the magazines at Camp Minden. The

magazine prioritization section included in our work plan will be updated based on the most recent US Army TAV report, magazine assessments conducted by ESI, as well as, any input received from LMD and EPA to address prioritization of the most critical magazines for disposal. The conditions in the magazines at Camp Minden are continually changing. ESI, for the duration of the project, will continually update the prioritization of the magazines to address the most critical magazines first until all the material has been safely removed for disposal.

Air Modeling: The proposal states that air emissions modeling analyses will be performed using the PAS to evaluate fence-line concentration of gaseous emissions. The following items are also necessary to model air emissions and dispersion of constituents.

Source Input Parameters:

- **Source Location:** This would be the location of any emission point (e.g., stack release point). This could be provided in either lat/lon or UTM coordinates. EPA also wants to confirmation that there will be only one emission point and no other point or fugitive releases expected.
- **Emission Rates:** List of all anticipated emitted pollutants (e.g., CO, NO_x, DNT) with an maximum short-term emission rate (lb/hr emission rate). Information regarding maximum long-term emission rate (tpy) is also necessary for evaluating emissions against long-term standards (e.g., annual NAAQS). If long-term emission rates are not available the short-term emission rate can also be used as a conservative model input.
- **Emission Point Parameters:** In the case of a stack, this will include the stack release height, stack exhaust temperature, stack diameter, and stack exhaust flow rate. If other emission sources, such as fugitive releases, are identified additional emission point information will be needed and will vary based on the source type.

Meteorological Data:

- **Surface and Upper Air Met Data Files:** This data will need to be accounted for in any modeling for this site.

Response:

Noted; all are included in the quotation and are anticipated to be provided in support of obtaining the required permit approvals. The air modeling analysis will include:

- a) Obtain and process 5 years of representative meteorological data
- b) Incorporate building dimensions into the analysis and conduct building downwash
- c) Calculations using the Building Profile Input Program with PRIME algorithms (BPIP/PRIME) software
- d) Develop fence line and grid model receptors and process with AERMOD's terrain preprocessing software AERMET to assign terrain information to each receptor point
- e) Complete AERMOD runs for a unitized emission rate scenario and, if needed, separate 1-hour SO₂ and NO₂ model runs

Air modeling deliverables will include the following:

- 1) A modeling protocol for submittal to the regulatory agency
- 2) Electronic files with all modeling data and results (modeling file)
- 3) Modeling methodology (report)
- 4) Receptor grid with graphic (report)
- 5) Meteorological data
- 6) Modeling results and concentration graphics (report)

The results of the modeled concentrations will be provided in a table as part of the modeling report, comparing the ambient concentration with and without background concentrations to the NAAQS. Hazardous air pollutants (HAP) values will be displayed as stand-alone concentrations. Contour plots will be provided, indicating the location of the maximum concentrations and a concentration gradient over the entire receptor grid.

Modeling results will include a summary of the modeling methodology, a table of model concentrations with and without background concentrations, concentration contour plots, and electronic files containing AERMOD input and output data, building and downwash files, and meteorological data.

Camp Minden M6 Destruction

Attachment B-3

May 21, 2015 and May 28, 2015 Request for
Clarifications and Amended Response dated
June 1, 2015



BOBBY JINDAL
GOVERNOR

State of Louisiana

LOUISIANA NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
8400 St. Claude Avenue
Jackson Barracks
New Orleans, LA 70117

GLENN H. CURTIS
MAJOR GENERAL
THE ADJUTANT GENERAL
(504) 278-8357
FAX (504) 278-8210

May 21, 2015

Explosive Service International
Mr. William T. "Billy" Poe
9985 Baringer Foreman Road
Baton Rouge, Louisiana 70809

Ref: Camp Minden M6 Disposal

Dear Vendor:

Reference the third request for "Clarification" memorandum dated May 18, 2015 concerning Camp Minden M6 Disposal.

As a result of the non-binding meeting on May 20, 2015, EPA has provided additional information in the attached DRAFT DOCUMENT – PER OUR DISCUSSIONS ON MAY 20, 2015 (encl). Request you utilize this draft document and the May 18, 2015 memorandum to provide to the best of your ability all pricing information.

I would like your written response no later than 11:00 a.m. Tuesday, May 26, 2015. To meet the suspense, the response can be sent via e-mail to owen.w.monconduit.nfg@mail.mil with the original sent to:

Louisiana Military Department
Deputy Director, Contracting and Purchasing
Brigadier General (Ret) Owen Monconduit
718 E Street, Camp Beauregard
Pineville, Louisiana 71360

We request that you keep this memorandum confidential. This memorandum does not create any intent or commitment by the Louisiana Military Department (State) to the Proposer other than clarification to your quote. The Louisiana Military Department reserves the right to make this "Clarification" action a contractual obligation if a contract ensues.

Any questions that you have about this correspondence should be directed to the undersigned at 318-641-5396.

Sincerely,

Owen W. Monconduit
Brigadier General (Ret) Louisiana Military Department
Deputy Director, Contracting and Purchasing

encl

DRAFT DOCUMENT - PER OUR DISCUSSIONS ON MAY 20, 2015

ON-SITE AIR

Initial Acceptance Testing of the Contained Burning System – Contractor will continuously monitor at the stack for CO, Total Hydrocarbons, NOx, O2, particulate and stack gas flow rate. Contractor will also sample for volatiles, semi-volatiles (which include dinitrotoluene, dibutylphthalate, and diphenylamine) and dioxins/furans.

Continuous Monitoring of the Contained Burning System after the completion of the Acceptance Testing – Contractor will continuously monitor at the stack for CO, Total Hydrocarbons, NOx, O2, particulate and stack gas flow rate.

Periodic Sampling of the Contained Burning System after the completion of the Acceptance Testing – Contractor will sample from the stack every three months for volatiles and semi-volatiles (which include dinitrotoluene, dibutylphthalate, and diphenylamine). Contractor will use the sampling results to calculate and demonstrate compliance with the Destruction and Removal Efficiency.

ON-SITE GROUNDWATER

Six groundwater monitoring wells should be install by the Contractor around the operational area. These wells should be sampled before the destruction of propellant begins and every 3 months after that till the completion of the project. These samples should be analyzed for volatiles and semi-volatiles (which include dinitrotoluene, dibutylphthalate, and diphenylamine).

ON-SITE SOIL

Soil samples should be collected by the Contractor and analyzed in the area of operation before and after destruction activities.

SURFACE WATER

Should the surface water evaluation determine sampling is necessary, Contractor will need to sample surface water pre and post destruction activities.

COMMUNITY MONITORING/SAMPLING

Initial Acceptance Testing of the Contained Burning System – Contractor will monitor and sample daily in the community for the constituents identified in EPA's Baseline Quality Assurance Sampling Plan for air and soil.

Weekly monitoring and sampling after the completion of the Acceptance Testing – Contractor will monitor and sample weekly in the community for the constituents identified in EPA's Baseline Quality Assurance Sampling Plan for air and soil until the completion of the project.



BOBBY JINDAL
GOVERNOR

State of Louisiana

LOUISIANA NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
6400 St. Claude Avenue
Jackson Barracks
New Orleans, LA 70117

GLENN H. CURTIS
MAJOR GENERAL
THE ADJUTANT GENERAL
(504) 278-8357
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May 28, 2015

Explosive Service International
Mr. William T. "Billy" Poe
9985 Baringer Foreman Road
Baton Rouge, Louisiana 70809

Ref: Camp Minden M6 Disposal

Dear Vendor:

Reference the third request for "Clarification" memorandum dated May 18, 2015 concerning Camp Minden M6 Disposal and the memorandum dated May 21, 2015 containing information from EPA.

Please include in the "Clarification" pricing for testing of samples submitted by EPA under the QUALITY ASSURANCE, SAMPLING, AND DATA ANALYSIS section, attachment F of the draft document.

Request your written response no later than 4:00 p.m. Friday, May 29, 2015. To meet the suspense, the response can be sent via e-mail to owen.w.monconduit.nfg@mail.mil with the original sent to:

Louisiana Military Department
Deputy Director, Contracting and Purchasing
Brigadier General (Ret) Owen Monconduit
718 E Street, Camp Beauregard
Pineville, Louisiana 71360

We request that you keep this memorandum confidential. This memorandum does not create any intent or commitment by the Louisiana Military Department (State) to the Proposer other than clarification to your quote. The Louisiana Military Department reserves the right to make this "Clarification" action a contractual obligation if a contract ensues.

Any questions that you have about this correspondence should be directed to the undersigned at 318-641-5396.

Sincerely,

Owen W. Monconduit
Brigadier General (Ret) Louisiana Military Department
Deputy Director, Contracting and Purchasing



Corporate Office
9985 Baringer Foreman Rd.
Baton Rouge, LA 70809

June 1, 2015

Brigadier General (Ret) Owen Monconduit
Deputy Director Contracting and Purchasing
Louisiana Military Department
718 E Street, Camp Beauregard
Pineville, LA 71360

Ref: Amended Third Clarification Request of Contained Burn System Quote dated May 21, 2015

Dear Sir,

Please find enclosed Explosive Service International's amended response to the above referenced request pertaining to our Contained Burn System Proposal. On May 28, 2015, we submitted our responses to all of the questions except for the Community Air Monitoring plan and cost. The attached response is all inclusive now with our response complete for the aforementioned.

If you have any questions or need additional information please let us know. We look forward to meeting tomorrow.

Sincerely,
Explosive Service International

A handwritten signature in black ink, appearing to read 'W. Jason Poe'.

W. Jason Poe
Vice President
jpoe@explosiveserviceintl.com
ofc: (225) 275-2152
cell: (225) 247-1771



Corporate Office
9985 Baringer Foreman Rd.
Baton Rouge, LA 70809

Clarification Request dated: May 18, 2015
Response dated May 28, 2015

Request a third "Clarification" of your quote for the Contained Burn System Proposal.
Request Clarification on the following:

- a. Quantify all "removal efficiency and emissions" for all constituents listed in your quote. Quantify the Basic Pollution Abatement System (PAS), Advanced PAS, and Maximum Removal Efficiency PAS in terms of both cost and removal efficiency and emissions. Quantify the terms "Projected Removal Efficiency and Emissions" and "Projected Average". Identify the removal efficiency and emissions for each PAS at the system design, system testing, and system operations; identify and provide the measurement processes and frequencies to capture actual removal efficiency and emissions.



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Response:

Emissions	ARAR Requirements from LDEQ ^{1,2}		Contractual Operations and Measurements ⁵		Maximum Removal Efficiency PAS ³	
	Required Removal Efficiency	Required Limits	Contractual Operation Limits	System Test Method	Design Removal Efficiency	Design Average Limits
CO ^{1,2}	NA	100 ppmdv	20 ppm	CEMS	NA	<2 ppm
NOx ²	NA	250 ppmdv	250 ppm	CEMS	>90%	<50 ppm
PM 10 ^{1,2}	NA	0.0016 gr/dscf	0.0016 gr/dscf total PM	IAT ⁶	>99.9999% See HEPA note below	<< 0.0016 gr/dscf total PM
Dioxins and Furans ¹	NA	0.11 ng/dscm	0.11 ng/dscm	IAT ⁸	NA	<< 0.11 ng/dscm ⁸
Mercury ¹	NA	8.1 ug/dscm	8.1 ug/dscm	NA ⁷	NA	Zero ⁷
Lead ¹	NA	10 ug/dscm with Cd	10 ug/dscm with Cd	NA ⁷	NA	Zero ⁷
Cadmium ¹	NA	10 ug/dscm with Pb	10 ug/dscm with Pb	NA ⁷	NA	Zero ⁷
Heavy Metals ¹	NA	23 ug/dscm combined As, Be, Cr	23 ug/dscm combined As, Be, Cr	NA ⁷	NA	Zero ⁷
Total Hydrocarbons (THC) ¹	NA	10 ppmdv NA	10 ppmdv	CEMS	NA	<1 ppm
HCl and Cl Gas ¹	NA	21 ppmdv	21 ppmdv	Added Cost Option ⁸	NA	NA ⁸
Principal Organic Hazardous Constituent (POHC) ¹						
2,4 Dinitrotoluene	99.99%	NA	99.999%	IAT/ Periodic	>99.9999%	<< 1 ppm
2,6 Dinitrotoluene	99.99%	NA	99.999%	IAT/ Periodic	>99.9999%	<< 1 ppm
Dibutyl Phthalate	99.99%	NA	99.999%	IAT/ Periodic	>99.9999%	<<1 ppm
Diphenylamine	99.99%	NA	99.999%	IAT/ Periodic	>99.9999%	<<1 ppm



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NOTES:

1- 40 CFR Part 63 Subpart EEE

2- State of Louisiana, LAC 33:III.2521

3- Maximum Removal Efficiency PAS: includes Contained Burn Thermal Treatment Chamber, Cyclone, Gas Cooler, Baghouse, Stack, Afterburner, SNCR, HEPA Filter and SCR

4- See Removal Efficiency by PM micron size for listed equipment:

Cyclone: 5-10 micron: 99.9%; 2.5 micron: <99%; submicron (0.3-0.5 micron): <90%

Baghouse: 5-10 micron: >99.999%; 2.5 micron: >99.99%; submicron (0.3-0.5 micron): 99.9%

HEPA: 5-10 micron: >99.9999%; 2.5 micron: >99.9999%; submicron (0.3-0.5 micron): >99.97%

5- The PAS system is generally designed to achieve stack emissions levels well below regulatory or contractual limits. Typically the system design point is 10% - 50% of applicable limits to provide an adequate and comfortable margin for operations.

The destruction removal efficiency (DRE) for three POHC's of concern is of particular interest for this project. Accordingly the Maximum Removal Efficiency PAS system is designed to achieve a DRE (99.99990) that is 100 times better than the already stringent regulatory standard (99.990%). Contractual operating limits are proposed for a DRE of 99.9990% which provides the appropriate margin for design versus operations, and is able to be verified with standard EPA test methods and detection limits. A summary of the stack concentrations and total mass emissions at 4, 5, and 6 9's is shown below for reference. It is noted that difference between 4 9's and 5 9's for total mass emissions is significant, while the difference between 5 9's and 6 9's is quite negligible. It is further noted that the operational limit of DRE > 99.999's ensures that the concentrations in the stack are even below the NIOSH REL for these constituents.

Total Mass emitted (lbs) based on 15,000,000 lbs M6

DRE	Dinitrotoluene (DNT)	Dibutylphthalate	Diphenylamine
99.9900%	150	45	15
99.9990%	15	4.5	0.15 1.5
99.9999%	1.5	0.45	1.5 0.15

Compound	Dinitrotoluene (DNT)	Dibutylphthalate	Diphenylamine
DRE 99.9990% - Stack Concentration (mg/m3)	0.080	0.024	0.008
NIOSH REL (mg/m3)	1.5	5	10

6- Initial Acceptance Testing

7- Not present in feed

8- Not present in feed, TBD if potential exists from treatment of packaging



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- b. The quote has limited information on air monitoring. Clarify what services are included in the quote for an Air Monitoring plan for the fence line and community environmental monitoring. If not in your quote, furnish a cost for an Air Monitoring plan for the fence line and community environmental monitoring, include associated details: type monitors, frequency, etc.

Response- Our response is included in the subsequent clarification request from LMD dated May 21, 2015.

- c. Clarify what services are included in the quote for ground water monitoring. If not in your quote, furnish a cost for ground water monitoring to include associated details: type monitoring, frequency, etc.

Response- Our response is included in the subsequent clarification request from LMD dated May 21, 2015.

- d. Confirm that one Comprehensive Performance Test is included in the original quote. Describe in detail the test method (to include will the material be Neat or other status) and measurement and/or emissions standards.

Response- One initial CPT is included in the original quote as part of initial acceptance testing (IAT) consistent with State and Federal Regulations. This scope includes the required replicate testing of one worst-case operating condition (with packaging). Recognizing the known poor storage conditions and associated safety concerns of the material; it is likely that throughout the course of the project it will be necessary to introduce packaging with material to the CBC. The table below summarizes measured parameters and test methods included in the original quote. The quote anticipated temporary stack access by manlift/scaffolding for this initial one time test period.

The sampling methods will be adapted with a deviation to allow for single point sampling in the stack, instead of traversing, where required, to satisfy safety requirements wherein personnel cannot be present at the stack during remote ignition and burning operations. The single sample point will be selected by traversing the stack prior to sampling to determine a representative point of average flow and temperature conditions.

PARAMETER	METHODOLOGY	COMMENTS	
Gas Velocity	EPA Methods 1 & 2	Performance Specification 6	
Gas Composition	EPA Method 3	Orsat analysis	
Oxygen	EPA Method 3A	Performance Specification 3	
Moisture Content	EPA Method 4	Back-half of Method 5	
Particulate Matter	EPA Method 5	Filterable PM	



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Particulate Matter	EPA Method 202	Condensable PM	
Sulfur Dioxide	EPA Method 6C	Western Research 921	
Oxides of Nitrogen	EPA Method 7E	Performance Specification 2	
Carbon Monoxide	EPA Method 10	Performance Specification 4B	
Methane and Ethane	EPA Method 18	Gas chromatography	
Volatle Organic Compounds	EPA Method 25A	Performance Specification 8	
Dioxins/Furans	EPA Method 23	GC/MS Analysis	
Semivolatile Organics	SW-846, Method 0010	Dinitrotoluene, Diphenylamine, and Dibutylphthalate	

Recently a question has been asked regarding performance of additional testing with the above methods on Neat material, this can be performed at an additional cost of \$93,824.00 per test. This data is expected to be of value in addressing public concerns, but the cost would be in addition to the original proposed "worst-case" operating condition as stated above.

Another question has been received regarding the cost for adding sampling of HCl and chlorine gas to the original CPT scope; this can be performed as an additional priced option using EPA method 26 for a cost of \$12,371.00 per operating condition.

- e. What is the cost for a single test of Volatile Organic Compounds (VOXs) after the system has begun operating? What is the approximate time to conduct this test? What is the process involved in conducting this test? Express the requested cost in a manner making the cost valid during the entire time the system operates should a directive be given to have this test performed one or more times. In the event that one or more VOX tests are directed, then the appropriate number of test requirements can be multiplied by your cost to obtain a total cost.

Response- The direct cost to periodically sample for SVOC's using SW-846, Method 0010 for DNT, Diphenylamine, and Dibutylphthalate following the initial CPT is \$37,761.00. This includes three 4 hour samples, with one day for mobilization and setup of sampling equipment, and two days for sampling, tear down of sampling equipment, and demobilization.

All pricing does not include any cost for split or duplicate samples that could be requested by State or Federal agencies in conjunction with this project. Split or duplicate samples can be provided at an additional cost (minus the mobilization and demobilization portion) for \$33,385.00 per event.

A dedicated sampling platform will be designed and constructed to accommodate this requirement, instead of using manlift/scaffolding each time, to minimize process interruption and total cost. The one-time cost addition for this platform is \$23,760.00.



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This will minimize the expected operational interruptions per test period to approximately 16 hours (over the three day period), with an indirect cost of \$31,652.00.

Thus the total added cost for each periodic sampling event for these three constituents of concern is \$69,413.00.

f. Confirm your Community Involvement Plan response of May 4, 2015.

Response- As previously discussed and agreed upon with the Louisiana Military Department (LMD), ESI will not develop a Community Involvement Plan. ESI will support the LMD with the requested documentation and information required to support a community involvement plan for the duration of the project. The release of all information derived from the disposal operations at Camp Minden will flow from ESI to LMD.



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DRAFT DOCUMENT - PER OUR DISCUSSIONS ON MAY 20, 2015

ON-SITE AIR

Initial Acceptance Testing of the Contained Burning System – Contractor will continuously monitor at the stack for CO, Total Hydrocarbons, NO_x, O₂, particulate and stack gas flow rate. Contractor will also sample for volatiles, semi-volatiles (which include dinitrotoluene, dibutylphthalate, and diphenylamine) and dioxins/furans.

Response—Particulate will not be continuously monitored through the CEMS system. It will be sampled at the same time as the volatiles, semi-volatiles, and dioxin and furans during the Initial Acceptance Testing. All other information is correct.

Continuous Monitoring of the Contained Burning System after the completion of the Acceptance Testing – Contractor will continuously monitor at the stack for CO, Total Hydrocarbons, NO_x, O₂, particulate and stack gas flow rate.

Response—Particulate will not be monitored through the CEMS testing. It will be measured during the Initial Acceptance Testing. All other information is correct.

Periodic Sampling of the Contained Burning System after the completion of the Acceptance Testing – Contractor will sample from the stack every three months for volatiles and semi-volatiles (which include dinitrotoluene, dibutylphthalate, and diphenylamine). Contractor will use the sampling results to calculate and demonstrate compliance with the Destruction and Removal Efficiency.

Response—Periodic Sampling, every three months, will not be for the volatiles, but will be for the semi-volatiles only, to include dinitrotoluene, dibutylphthalate, and diphenylamine. All other information is correct.

ON-SITE GROUNDWATER

Six groundwater monitoring wells should be install by the Contractor around the operational area. These wells should be sampled before the destruction of propellant begins and every 3 months after that till the completion of the project. These samples should be analyzed for volatiles and semi-volatiles (which include dinitrotoluene, dibutylphthalate, and diphenylamine).

Response

Task 1 – Pre-Activity Soil Sampling & Installation of Monitoring Wells – (\$63,700)

It is proposed to advance six (6) boreholes to a maximum depth of 50 feet below ground surface (bgs) completed with 2-inch permanent monitoring wells around the perimeter of the operational area. During drilling activities, the lithology will be visually classified and logged. Soil vapor screening will be conducted continuously (2 foot intervals) using a photo-ionization detector (PID). A portion of each soil sample will be collected and allowed to stand for volatilization of possible hydrocarbon vapors. Immediately upon field screening, a minimum of three (3) soil samples per soil boring will



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be selected for laboratory analysis of RECAP Volatile Organic Compounds (VOCs, Method 8260B); RECAP Semi-Volatile Organic Compounds (SVOCs, Method 8270B); and dinitrotoluene, dibutylphthalate, and diphenylamine. The Samples submitted for laboratory analysis will be determined by the following RECAP Appendix B criteria: highest PID reading in surface soil (0–15 feet bgs); highest PID reading in subsurface soil: (> 15 feet bgs); first encountered groundwater; and total depth of borehole.

Each of the six (6) boreholes will be completed with a 2-inch monitoring well; constructed of schedule-40 PVC casing, 10 foot long 0.01-inch slotted screen assembly, 20/40 silica sand filter pack, and bentonite seal. The six (6) monitoring well locations will be completed with an above ground surface completion, lockable metal shroud, concrete pad, and four (4) protective metal guard posts.

Upon completion of monitoring well installation, each well will be developed via low-flow micro purging technique with a peristaltic pump (Geopump) to remove fine-grained particles. Once the groundwater levels in the wells have stabilized, static water level measurements in the six (6) newly installed wells will be gauged, and groundwater samples will be collected and submitted to the laboratory for analysis of RECAP VOCs; RECAP SVOCs, dinitrotoluene, dibutylphthalate, and diphenylamine.

Quality assurance/Quality Control (QA/QC) samples will also be collected/prepared that include one (1) equipment rinsate per day; one (1) field blank per day; one (1) trip blank per ice chest of samples for volatile analysis; one (1) field duplicate per 20 samples; and one (1) matrix spike/matrix spike duplicate (MS/MSD) per day. Soil, groundwater, and QA/QC samples will be collected in new, laboratory-supplied, pre-preserved containers (if applicable), labeled, wrapped in bubble pack, and placed on ice in a cooler for transportation to the laboratory. At the conclusion of field activities, sample containers will be shipped to the laboratory accompanied by proper chain-of-custody documentation for analytical testing.

Horizontal and vertical surveying of the six (6) monitoring well locations, ground elevation, and top casing elevations will be performed by a licensed land surveyor. The monitoring wells will be registered with the Louisiana Department of Natural Resources (LDNR) in accordance with guidelines.

Following receipt of soil and groundwater analytical data, a report will be prepared summarizing site activities and findings of the soil and groundwater data prior to commencement of the project. The report will include a summary of field activities, boring logs, construction diagram for each monitoring well, tables summarizing analytical results, and figures (site map showing the sample locations, potentiometric map showing the groundwater elevations and flow direction, and iso-concentration maps).

Task2-Groundwater Sampling and Analysis – (\$16,250 per event)

Groundwater monitoring and sampling will be performed on a quarterly basis throughout the duration of the project. Groundwater monitoring and sampling activities will be implemented at the



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site in accordance with the Louisiana Department of Environmental Quality (LDEQ) Risk Evaluation Corrective Action Program (RECAP) Document dated October 20, 2003 Appendix B. Data for the determination of the groundwater potentiometric surface will be collected at each of the six (6) newly installed monitoring wells around the operational area. Following gauging, the monitoring wells will be purged using the low-flow micro purging technique with a peristaltic pump and dedicated tubing or by using a down hole pump and dedicated tubing. Water quality data may be collected if the low-flow micro purging technique is implemented to determine when stabilization is achieved. Groundwater samples will be collected in new laboratory-supplied, pre-preserved containers and analyzed for RECAP VOCs; RECAP SVOCs, dinitrotoluene, dibutylphthalate, and diphenylamine. Additionally, QA/QC samples will be collected/prepared as described in Task 1. At the conclusion of the groundwater sampling event, sample containers will be shipped to the laboratory accompanied by proper chain-of-custody documentation for analytical testing.

Following receipt of groundwater analytical data, a Groundwater Monitoring Report summarizing the sampling event and findings will be prepared. The Groundwater Monitoring Report will include a summary of field activities, tables summarizing analytical results, and figures (site map showing the sample locations, potentiometric map showing the groundwater elevations and flow direction, and iso-concentration maps).

All pricing does not include any cost for split or duplicate samples that could be requested by State or Federal agencies in conjunction with this project. Split or duplicate samples can be provided at an additional cost (minus the mobilization and demobilization portion).

Task3-Post Project Soil Sampling & Monitoring Well Plug and Abandonment – (\$41,600)

Six (6) boreholes will be advanced for the purpose of post-activity soil sampling around the operational area. Boreholes will be advanced to a maximum depth of 50 feet bgs and continuously (2 foot intervals) screened for soil vapors using a PID. Immediately upon field screening, a minimum of three (3) soil samples per soil boring will be selected from each borehole for laboratory analysis of RECAP VOCs; RECAP SVOCs, dinitrotoluene, dibutylphthalate, and diphenylamine

Upon completion of the project, it is proposed to plug and abandon the six (6) perimeter monitoring wells around the operational area if groundwater concentrations have remained below RECAP standards for four (4) consecutive quarters of monitoring. Monitoring wells will be plugged and abandoned in accordance with LDEQ and LDNR guidelines and each location will be restored back to original condition. Well plug and abandonment forms will be prepared and submitted to the LDNR in accordance with guidelines.

ON-SITE SOIL

Soil samples should be collected by the Contractor and analyzed in the area of operation before and after destruction activities.

Response – Included, ESI intends to conduct soil sampling throughout the area of operation before any



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activity and upon completion of all disposal activity. Surface soil samples, (0-6" bgs), will be collected throughout the area of operation. Samples will be collected in new laboratory-supplied, pre-preserved containers and analyzed for RECAP VOCs; RECAP SVOCs, dinitrotoluene, dibutylphthalate, and diphenylamine. Additionally, QA/QC samples will be collected, prepared and submitted. Sample containers will be shipped to the laboratory accompanied by proper chain-of-custody documentation for analytical testing. Any additional test parameters could be performed for additional cost and based on specific request.

Following receipt of analytical data, a Soil Monitoring Report summarizing the sampling event and findings will be prepared. This report will include a summary of field activities, tables summarizing analytical results, and figures (site map showing the sample locations).

All pricing does not include any cost for split or duplicate samples that could be requested by State or Federal agencies in conjunction with this project. Split or duplicate samples can be provided at an additional cost per event.

SURFACE WATER

Should the surface water evaluation determine sampling is necessary, Contractor will need to sample surface water pre and post destruction activities.

Response- Not included in original scope of work due to the lack of pathway for contamination. Sampling the surface water can be conducted by collecting samples up-gradient, down-gradient and the source point introduction to the closest surface water source. Each location will be sampled for both water and surface sediment. Following receipt of surface water and sediment analytical data, a Surface Water and Sediment Monitoring Report summarizing the sampling event and findings will be prepared.

Water and Sediment samples will be analyzed for:

- VOCs by SW-846 Method 5035/8260
- SVOCs including explosive residues by SW-846 Method 8270C
- TCLP Metals by SW-846 Method 1311
- pH by SW-846 Method 9040

The cost is \$5,500 per sampling event.

All pricing does not include any cost for split or duplicate samples that could be requested by State or Federal agencies in conjunction with this project. Cost for split samples is \$3,800 per event.

COMMUNITY MONITORING/SAMPLING

Initial Acceptance Testing of the Contained Burning System – Contractor will monitor and sample daily in the community for the constituents identified in EPA's Baseline Quality Assurance Sampling Plan for air and soil.



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Weekly monitoring and sampling after the completion of the Acceptance Testing – Contractor will monitor and sample weekly in the community for the constituents identified in EPA’s Baseline Quality Assurance Sampling Plan for air and soil until the completion of the project.

Response- not included in the original scope of work.

Air- We reviewed and referenced the EPA's Baseline Sampling plan to develop our approach and proposal with consideration for the public concern regarding air emissions. We will be using the same equipment and analytes as the EPA used to conduct the baseline sampling; which include the following:

<u>Pieces</u>	<u>Equipment</u>	<u>Analyte</u>
4	PUF Sampler	Analytical Dioxins, Furans, SVOCs
4	Summa Canister	Analytical for VOCs
4	BGI PQ200	Particulate PM 2.5 and 10
4	MetOne BAM 1020	Real-Time Particulate PM 2.5 and 10
4	Thermo 42i	Real-Time NOx
4	Thermo 43i	Real-Time SO2
4	Thermo 48i/TLE	Real-Time CO
4	Teledyne 360E	Real-Time CO2
1	Meteorological Station	N/A

All sampling and monitoring equipment will be trailer mounted and will be able to be relocated if necessary. This solution will also eliminate the need to build concrete pads.

Real-Time monitoring will be conducted 24/7 for the duration of the project. Analytical sampling for each specific analyte will be conducted once a week for the duration of the project. The only time instruments will be offline is for maintenance and/or calibration. Daily, on-site personnel will staff the monitoring equipment, conduct maintenance, calibration, and manage data collection and reporting in support of the project.

We propose 4 monitoring and sampling locations; North and South of the source point (Area I), another near the fence line of the Camp Minden boundary and one at a designated community location. Exact locations will be selected after a site visit/assessment is conducted and in conjunction with the regulatory agencies.

Cost Estimate: Based on 400 days of continuous monitoring & up to 2 weeks of initial acceptance monitoring at start-up. Additional weekly monitoring beyond 400 days would be involved at the stated weekly rate (\$39,937.17/week).

Description	Time	Unit Cost	Total Cost
Initial Acceptance Monitoring (daily)	2 weeks	\$134,612.93	\$134,612.93
Continuous Emission Monitoring System (4 ea.)	continuous	\$1,929,363.31	\$1,929,363.31
Long term weekly monitoring	57.14 weeks	\$39,937.17/week	\$2,282,123.93
	Total		\$4,346,100.17

Soil–Grab soil samples will be collected at the surface (0 to 1 inch) at the selected air monitoring location weekly. Using dedicated plastic scoops soil will be collected and submitted in dedicated sample



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containers and placed on ice prior to shipping to the designated laboratory. Soil samples will be analyzed for:

- VOCs by SW-846 Method 5035/8260
- SVOCs including explosive residues by SW-846 Method 8270C
- Dioxin/Furans (PCDD/PCDF) by SW-846 Method 8290A
- TCLP Metals by SW-846 Method 1311
- pH by SW-846 Method 9040

Soil Cost: \$2,625.00 per sample event to include all of the above test parameters.

All pricing does not include any cost for split or duplicate samples (Air or Soil) that could be requested by State or Federal agencies in conjunction with this project. Split or duplicate samples can be provided at the same cost per event noted above.

Camp Minden M6 Destruction

Attachment B-4

June 8, 2015 Request for Clarification and
Response dated June 15, 2015



BOBBY JINDAL
GOVERNOR

State of Louisiana

LOUISIANA NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
6400 St. Claude Avenue
Jackson Barracks
New Orleans, LA 70117

GLENN H. CURTIS
MAJOR GENERAL
THE ADJUTANT GENERAL
(504) 278-8357
FAX (504) 278-8210

June 8, 2015

Explosive Service International
Mr. William T. "Billy" Poe
C/O Mr. William "Jason" Poe
9985 Baringer Foreman Road
Baton Rouge, Louisiana 70809

Ref: Camp Minden M6 Disposal

Dear Mr. Poe:

Respectfully, this is a fourth request for "Clarification". Request you carefully review the Environmental Protection Agency's (EPA) final determination for these Applicable, Relevant, and Appropriate Requirements (ARAR) (see attached EPA memo dated June 8, 2015 with Attachment E).

Please include in your "Clarification" a) written verification that ESI will be able to comply with the requirements set by the ARARs (EPA memo and Attachment E), and b) provide any pricing data necessary to comply with meeting and achieving the ARARs. Also, please clarify ESI's approach to provide the Performance Bond (Surety Bond) as outlined in paragraph 22 of the draft agreement.

Request your written response no later than 5:00 p.m. Wednesday, June 10, 2015. To meet the suspense, the response can be sent via e-mail to owen.w.monconduit.nfg@mail.mil with the original sent to:

Louisiana Military Department
Deputy Director, Contracting and Purchasing
Brigadier General (Ret) Owen Monconduit
718 E Street, Camp Beauregard
Pineville, Louisiana 71360

This memorandum does not create any commitment by the Louisiana Military Department (State) to the Proposer other than clarification to your quote. The Louisiana Military Department reserves the right to make this "Clarification" action a contractual obligation if a contract ensues.

Any questions about this correspondence can be directed to the undersigned at 318-641-5396.

Sincerely,

Owen W. Monconduit
Brigadier General (Ret) Louisiana Military Department
Deputy Director, Contracting and Purchasing

encl



Corporate Office
9985 Baringer Foreman Rd.
Baton Rouge, LA 70809

June 15, 2015

Brigadier General (Ret) Owen Monconduit
Deputy Director Contracting and Purchasing
Louisiana Military Department
718 E Street, Camp Beauregard
Pineville, LA 71360

Ref: Fourth Clarification Request of Contained Burn System Quote dated June 8, 2015

Dear Sir,

Please find enclosed Explosive Service International's response to the above referenced request pertaining to our Contained Burn System Proposal. This response is based on the Applicable, Relevant, and Appropriate Requirements (ARAR)'s received from the EPA in the memorandum dated June 8, 2015 with Attachment E.

If you have any questions or need additional information please let us know. We look forward to working with the Louisiana Military Department to safely and efficiently resolve this problem at Camp Minden.

Sincerely,
Explosive Service International

A handwritten signature in cursive script, appearing to read 'W. Jason Poe'.

W. Jason Poe
Vice President
jpoe@explosiveserviceintl.com
ofc: (225) 275-2152
cell: (225) 247-1771



Corporate Office
9985 Baringer Foreman Rd.
Baton Rouge, LA 70809

Clarification Request dated: June 8, 2015
Response dated June 15, 2015

Respectfully, this is a fourth request for "Clarification". Request you carefully review the Environmental Protection Agency's (EPA) final determination for these Applicable, Relevant, and Appropriate Requirements (ARAR) (see attached EPA memo dated June 8, 2015 with Attachment E).

Please include in your "Clarification" a) written verification that ESI will be able to comply with the requirements set by the ARARs (EPA memo and Attachment E),

Response:

The Contained Burn System with Pollution Abatement System, with all additional quoted options included, will be provided by El Dorado Engineering for the Camp Minden removal action to provide a system for the thermal treatment and disposal of M6 and CBI material. This system provided by EDE will have the capability to comply with the applicable elements of the recently received EPA letter and revised Attachment E ARARs received by email on June 8, 2015. This includes provision of the following upgraded pollution control system which meets the stack concentration limits stated in the ARARs during treatment of M6 and CBI. This also includes provision of a continuous emissions monitoring system (CEMS) to continuously monitor the required parameters and provision of stack sampling services to perform periodic stack sampling per the ARARs and quoted pricing provided by contractor. The ability of the proposed system to meet the applicable ARARs will be demonstrated during initial compliance testing.

Compliance of the provided system is based upon treatment of M6 and CBI materials, on the basis that the treated materials will consist of nitrocellulose, dinitrotoluene, dibutylphthalate, and diphenylamine. It is a condition of system compliance that no heavy metals, mercury, sulfur, chlorine or chlorinated compounds, fluorine, or other materials or contaminants will be present in the treated materials which result in noncompliance with these ARARs.

and b) provide any pricing data necessary to comply with meeting and achieving the ARARs.

Response:

Periodic Stack sampling for VOC's using SW-846, Method 0031 - \$38,550.00 per event.

This includes three 4 hour samples performed concurrently within the same mobilization and demobilization period as outlined in quarterly SVOC's sampling event in 3rd clarification. This was not included in the original CPT scope and is expected to be performed four times over the life of this project.



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Periodic Stack sampling for Dioxin and Furan – \$36,435.00 per event

This includes three 4 hour samples performed concurrently within the same mobilization and demobilization period as outlined in quarterly SVOC's sampling event in 3rd clarification. ARAR's dictate semi-annual monitoring for the above and it is expected to be performed 2 times over the life of the project.

Monitoring of Afterburner Combustion Air Flow Rate - \$40,950.00

Design and Installation of additional equipment required to monitor the combustion air flow due to the additional ARAR requirement per EPA to include:

Added Equipment:

- Flow Meter
- Wiring
- Data Input Hardware
- Data Recording Hardware

Labor:

- Design
- Procurement
- Installation
- Programming
- Systemization

Additional Stack Sampling Port - \$3,300.00

In order to eliminate additional process interruption it will be necessary to add an additional stack sampling port. This allows for simultaneous stack sampling related to the added stack sampling scope and eliminates any further process interruption.

Additional/Upgraded PAS Equipment - \$887,868.00

Upgrade to the originally designed pollution abatement equipment outside the original scope of the project will be necessary to meet the revised ARARs. These upgrades will allow for additional control and reduction of stack oxygen percentage to eliminate risk due to the added oxygen correction requirement in the ARARs. This allows contractor to guarantee that revised ARARs (with 7% O₂ correction where applicable) will be met at all times.

Equipment:

- Upsized Burner
- Upsized Fuel Train
- Distributed Exhaust Inlet (High Temp. Ceramic)
- Additional Process Oxygen Monitor
- Combustion Air Supply VFD
- Wiring
- Controls Hardware



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Labor:

- Design
- Procurement/Fabrication
- On-Site Installation/Construction
- Programming
- Systemization

Additional Fuel Operating Cost

The system as proposed is designed with the basis of 13.5 MMBTU/hr average operating fuel usage. No costs were considered or included in the original proposal to use additional fuel solely for reducing stack oxygen levels because stack oxygen concentration correction factors were assumed to be not applicable for a subpart X unit.

The additional ARAR requirement, including correction of stack emissions to 7% oxygen, where applicable, could result in a requirement for the contractor to use additional fuel solely to reduce stack oxygen levels. The amount of fuel, if any, that may be required to meet this requirement can only be determined accurately during the comprehensive performance test.

Accordingly, in order to meet this additional ARAR requirement without adding cost to the contractor, any cost borne by the contractor above 13.5 MMBtu/hr (averaged daily) would have to be reimbursed by LMD.

The actual cost only will be passed on, without markup. This minimizes the impact of additional costs to the client from this added requirement.

Also, please clarify ESI's approach to provide the Performance Bond (Surety Bond) as outlined in paragraph 22 of the draft agreement.

Response:

As we have made the state aware, we have had to delay finalizing the issuance of our performance bond pending receipt of price quotes for the technology required to comply with the EPA's latest requirements. Late Friday night, June 12, 2015, we were notified by email that the contract would have to be signed by Wednesday, June 17, 2015. Our surety will have to review the final contract before completing the bond issuance process. Contractor will provide the bond to the state upon issuance by the surety, but in any event within the time period contemplated by paragraph 22 of the contract.



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Schedule update:

Contained Burn Chamber Timeline - \$150,000.00 estimated

Although not requested in the fourth request for clarification letter dated June 8, 2015, the contractor wishes to inform the state on the latest schedule impacts of the contract award date.

The large containment chamber is a long lead item and a key driver for the project schedule critical path. The completion date for fabrication and installation of the chamber is highly dependent on the contract award date, steel ordering date (steel mill run slots) and factory availability at the planned vendor with the unique capacity to provide this piece of equipment.

During the interim period following selection of the technology and contractor by LMD, the June steel mill run slots, fabricator shop space, and schedule have been filled with additional paid orders which have been placed ahead of the upcoming order on this project.

As of June 12, 2015 the chamber vendor has contacted their major materials suppliers, including the mill which will roll the steel, and provided a schedule based on a purchase order date received on or before June 22nd. This current schedule shows completion of installation of the chamber on Jan. 12, 2016.

The contractor has inquired about what can be done to expedite this schedule and overcome current schedule constraints. The vendor has indicated that the schedule could potentially be accelerated through additional of substantial overtime labor costs and possible payment of expediting fees to suppliers, which was not included in the original proposal cost.

This available improvement to the schedule has been estimated at 4-5 weeks at a cost of approximately \$150,000. If directed by LMD the contractor can pursue this expedited option with the chamber vendor and would agree to pass on only the amount of actual additional cost incurred with the chamber vendor, without any markup, to benefit the project schedule.

Community Air Monitoring

Due to the specific request by the EPA and direction to use their baseline monitoring plan and associated equipment as the basis for our community air monitoring; the specialized equipment has a long lead time (4-6 months). It must be built specifically for this project. The contractor wishes to advise the LMD that it is imperative that the ordering of this equipment be placed upon contract award to prevent any delay.

Language around air monitoring reference in the 3rd clarification is based on ordering the special air monitoring equipment to be built specific for this project and delivered to site prior to the commissioning of the Contained Burned Chamber system. Again, the lead time for this EPA specific equipment is 4-6 months; so it must be ordered immediately after execution of contract.



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Minor Sub-Contractor Insurance Requirement

The \$3 million insurance requirement for minor sub-contractors will not allow contractor to hire local small businesses to perform work on this project without bearing substantial increases to their existing policies. At the time of this submittal it remains unclear of the States intention regarding this matter. As such, any additional increases in policies will be passed on to the State without markup by contractor in the event that this is not resolved in favor of the subcontractor.

Camp Minden M6 Destruction, Attachment C – Intentionally Left Blank.

Nothing follows.

Camp Minden M6 Destruction, Attachment D – Deliverables

The deliverables listed in this section are the minimum desired from the successful Contractor.

The method as to how the deliverables will be provided shall be approved by the Project Coordinator. Contractor shall identify and comply with all state and federal regulatory requirements in providing deliverables. Deliverables at a minimum shall be as follows:

a. Pre-Final Execution of the Contract Submittals – Submittal and Approval of Contractor and Key Personnel Qualifications by EPA for Final Execution of the Contract.

b. Submittal, implementation, compliance, execution, approval and closeout of:

1. Work Plan.
2. Health and Safety Plan.
3. Quality Assurance Project Plan.
4. Quality Assurance Sampling Plan.
5. Spill and Emergency Response Contingency Plan.
6. Post Removal Site Control Plan.
7. Safety Site Plan.
8. Continuous Emissions Monitoring System (CEMS) Performance Evaluation Plan.
9. Startup, Shutdown and Malfunction Plan.
10. Storm Water Pollution Prevention Plan (if applicable).
11. Comprehensive Performance Test Plan including a Quality Assurance Project Plan for the test.
12. Continuous Monitoring System (CMS) Performance Evaluation Test Plan (if applicable).
13. Operation and Maintenance Plan.
14. Bag house Corrective Measures Plan.
15. Emergency Safety Valve Operating Plan.
16. Waste Management Plan for disposal for all of the ancillary waste - ash, boxes, pallets, bags, any water, derived waste, etc.,

and all other requirements to perform this contract as directed to ensure compliance with all applicable state and federal regulatory requirements. All work is to be certified in writing as applicable to comply with all state and federal regulatory requirements.

c. Contractor shall identify, secure, and maintain all licenses, permits, approvals, and pay inspection fees required to do the work to complete this contract in absolute compliance with all state and federal regulatory requirements.

d. Removal and disposal of all materials listed in paragraph 2 of this contract in accordance with the standards contained with this contract and all State and Federal regulatory requirements.

e. Reports and documentation as directed within this contract or any as directed in the execution of the work per all State and Federal regulatory requirements.

f. Post Removal Site Control Plan and required actions.

g. Hazardous materials disposal and site clearance certifications resulting from the execution of work contained in this contract.