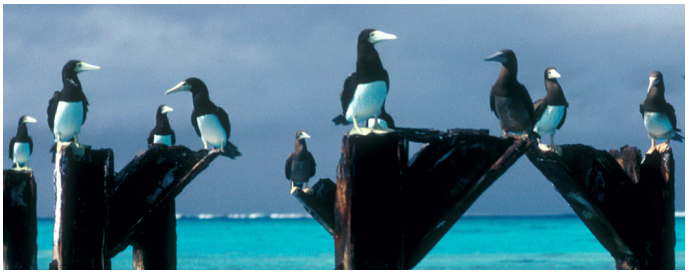
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

EPA APPROVES JACADS CLOSURE PLAN

NOTICE OF PERMIT CHANGE

September 4, 2002



Brown Boobies living on Johnston Atoll

Today the EPA (Environmental Protection Agency) is approving the Army's Closure Plan for the JACADS (Johnston Atoll Chemical Agent Disposal System) facility.

Permit Change

The U.S. EPA is allowing the Army to modify the hazardous waste storage and treatment permit for the JACADS facility to include the Closure Plan. This approval of the change to the Army's permit will guide the Army in dismantling and cleaning up the JACADS facility. We believe that this Closure Plan, which is now complete, will make the JACADS area safe for wildlife and people, including children, that live on or around Johnston Atoll.

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Many comments were received from the public regarding concerns about how the Army would clean up the facility. The Army is required to ensure that the JACADS area is in a safe condition when they leave. By working with the public and the Army, EPA has made some significant changes to the original version of the Closure Plan.

On July 27, 2000, the Army sent EPA a request to change the permit to update the JACADS Closure Plan. The Closure Plan addressed facility dismantling, treatment of waste and methods of clean up. The plan also included the HHERA (Human Health and Ecological Risk Assessment) work plan, a SAP (Sampling and Analysis Plan), and a QAPP (Quality Assurance Project Plan).

On April 18, 2001, EPA partially approved the Closure Plan allowing treatment of closure waste only by incineration. At that time, other treatment methods and the HHERA work plan, SAP and QAPP were under development and not complete.

Tang fish living around Johnston Atoll

Background

The Army operates the JACADS facility on Johnston Atoll, located 800 miles southwest of Hawaii. The JACADS facility was designed to take apart and burn (incinerate) military weapons containing chemical nerve agent and blister agent (known as mustard). Starting in 1990, the Army has destroyed four million pounds of chemical agent and chemical weapons originally stored on Johnston Island. On November 29, 2000, the Army destroyed the last of the remaining chemical weapons stockpile on Johnston Atoll.

The JACADS facility

After closure is complete, the atoll will remain a National Wildlife Refuge. The atoll will be turned over to the USFWS (U.S. Fish and Wildlife Service) who will monitor the wildlife to ensure that the wildlife will continue to flourish.

The Army sent EPA a request to modify the JACADS RCRA (Resource, Conservation and Recovery Act) permit describing how the Army would clean up and close the JACADS facility. The Army announced this request in a July 19, 2000 public notice. On August 3, 2000, the Army held a public meeting in Honolulu, Hawaii. EPA received written comments from the public during the comment period that ended October 27, 2000.

The modification request was incomplete and only partially approved by EPA. In a letter dated April 18, 2001, partial approval limited the Army to treating, by incineration, wastes generated by closure activities.

Due to extensive comments from EPA and the public, the Army revised the Closure Plan and announced the newly changed Closure Plan in a November 28, 2001 public notice. On December 11, 2001, the Army held a public meeting in Honolulu, Hawaii. EPA received additional comments from the public on the revised Closure Plan in a comment period that ended February 28, 2002.

Changes to the Closure Plan

As mentioned on page 1, the Army plans to clean up the facility and leave the island permanently. There are many steps they must accomplish to demonstrate that they are leaving the JACADS site clean and safe. Several changes have been made to the Closure Plan, thanks to those of you who have sent comments to EPA. We appreciate your involvement.

Two of the most commonly asked questions posed to EPA were “How clean is clean?” and “How is that clean up level going to be safe for humans (including children) and the wildlife living on and around Johnston Atoll?” Several sweeping changes in the design and text of the Closure Plan were made to address these concerns. The following paragraphs summarize the major changes.

1. The HHERA (Human Health and Ecological Risk Assessment)

Commenters were concerned that the JACADS area would not be safe for children if they were in the area. The U.S. Army had proposed establishing contaminant cleanup levels based upon industrial-type uses for the JACADS area. EPA does not consider the potential exposures from this type of use designation protective of sensitive subgroups or children. Therefore EPA has requested, and the Army has agreed, that the risk evaluation at JACADS will incorporate the unique activity and exposure patterns which are specific to children. JACADS soil samples will be contrasted with EPA residential cleanup concentrations to ensure residual contamination remains below the most protective risk-based levels, and that all potential receptors are safe.

In the Ecological Risk Assessment work plan, a data search was performed by the Army to identify conservative values (i.e. benchmarks) below which significant risks to wildlife would not be expected. Comparison of environmental sampling results with these benchmarks, along with evaluation of potential exposure to wildlife, will allow EPA to determine whether or not cleanup of the JACADS areas is necessary to protect the wildlife. The wildlife of primary concern are various species of birds, fish, the Pacific green sea turtle and the Hawaiian monk seal.

2. The SAP (Sampling and Analysis Plan)
The SAP now has a sampling plan for the MDB (Munitions Demilitarization Building) that requires the Army to sample every square meter of the inside of the building to make sure that there is no more chemical agent or RCRA contamination left there. The sampling plan also requires the Army to sample areas where waste was stored, and areas down wind of the incinerators' smoke stack to ensure the whole JACADS area is safe.

3. DQOs (Data Quality Objectives)
A new section was added to the Closure Plan describing the goals of clean closure to ensure that the data EPA receives from the Army will demonstrate that the area is clean.

4. Laboratory Analysis Method to Analyze for Chemical Agent
EPA is requiring the Army to develop methods for testing waste for chemical agent. These methods (although not yet complete) will be submitted to EPA for approval on a schedule required by the permit. Other standard EPA testing methods will be used to analyze for other site specific chemicals of concern.

Red Tailed Tropic Bird and Chick

History of Johnston Atoll

Johnston Atoll has been a National Wildlife Refuge since 1926 and has hosted various military missions since 1936). Next year, the last active military mission should come to an end.

Johnston Atoll is an unincorporated territory of the United States located in the central Pacific region, about 800 miles Southwest of the Hawaiian islands. The atoll is one of the oldest and most remote in the world. It consists of approximately 50 square miles of shallow coral reef surrounding four islands, the largest of which (625 acres) is Johnston Island. Currently, there are over 600 people living and working on Johnston Island. The remaining three islands are uninhabited and serve as vital nesting grounds for thousands of migratory seabirds.

In the late 1950's into the early 1960's Johnston was utilized as a base for atmospheric nuclear testing. In the mid-1970's surplus Agent Orange was transported to Johnston from Vietnam. Chemical weapons have been stored on Johnston since 1970, and since 1990 Johnston has been home to the world's first chemical weapons incinerators, JACADS. With a legacy like Johnston's you might picture a barren landscape devoid of wildlife. Actually, Johnston supports a rich and varied ecosystem; home to thousands of nesting seabirds, beautiful corals and colorful tropical fish.

Additional Information

You may find out more information about Johnston Atoll and the JACADS project by accessing the following Internet address: www.epa.gov/region09/waste/jacads

This notification is being sent to all people on the JACADS mailing list as required by regulations (40 CFR 270.42(f)). Response to public comments will be sent out under separate cover. If you would like to receive a copy, please contact Stacy Braye at 415-972-3345, fax 415-947-3533 or email at braye.stacy@epa gov.

The approved permit modifications will go into effect thirty days from the date of this notification. In accordance with 40 CFR 124.19, appeals to this permit change must be filed by October 4, 2002 and should be addressed to:

Environmental Protection Agency
Office of the Administrator
Environmental Appeals Board
401 M St. SW, Room 1145 (West Tower)
Washington DC 20460

The full Administrative Record about the JACADS facility, this permit and permit changes can be reviewed between the hours of 8:00 AM and 4:30 PM, Monday through Friday at:

U.S. Environmental Protection Agency
75 Hawthorne Street (WST-4)
San Francisco, CA 94105
Contact: Vernon Christianson, (415) 947-4596
or e-mail at christianson.vern@epa.gov

Red-Footed Booby

To get on EPA's JACADS mailing list to receive other information about JACADS and JACADS closure, please call Vicky Semones, EPA Office of Community Involvement, at (415) 972-3238 or toll-free at (800) 231-3075. To get on the Army's JACADS mailing list to receive additional information, please call Barry Napp, Public Outreach and Information Office, at (410) 436-6137. If you wish to receive this fact sheet in another language, you may call the Office of Community Involvement toll-free at (800) 231-3075.

More detailed information about these changes
and more about the JACADS project can be found at:

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