

MERCURY

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DNSC Issues Final Mercury Management EIS

The Defense National Stockpile Center (DNSC) has released the *Final Mercury Management Environmental Impact Statement* (Final EIS), which will assist DNSC in determining how to manage its elemental mercury inventory over the long-term. The mercury is no longer needed for national defense. The Final EIS provides DNSC's responses to the 633 specific comments received on the Draft EIS.

DNSC Administrator Cornel Holder described the Final EIS as "a technically solid document based on rigorous scientific analysis" that reflects input from other federal agencies, state and local governments, community leaders, industry, public interest groups, and the general public. He said, "DNSC has supported public outreach throughout the EIS process and will continue to inform communities affected by the mercury management alternative that is selected."

Holder also expressed appreciation for the advice and reviews provided by the Mercury Management EIS Interagency Working Group, which includes two Cooperating Agencies, the Department of Energy and the Environmental Protection Agency, as well as other federal agencies. These agencies shared their mercury expertise with DNSC and contributed to the EIS decisionmaking process.

Three Alternatives Evaluated

The Final EIS evaluates three alternative ways to manage DNSC mercury over the long term. It describes the potential environmental, human health, and socioeconomic effects of each alternative. The alternatives evaluated are:

- Consolidation and storage of mercury at one site
- No Action: continuing mercury storage at current locations
- Sale of the mercury

The Final EIS concludes that most of the environmental and socioeconomic impacts would be small (referred to as 'negligible' to 'minor' in the EIS) for each of the three mercury management alternatives. It notes that differences among the alternatives are not sufficient in themselves to support the selection of one.

Consolidated Storage Is Preferred Alternative

As in the Draft EIS, Consolidated Storage remains DNSC's Preferred Alternative, based on a combination of environmental, economic and technical factors as well as policy considerations and public comments. DNSC believes that storing the mercury at one site is the best way to meet its objectives, because it would simplify storage operations and result in economies of scale since fewer resources would be required

to maintain the mercury inventory. Consolidating the excess DNSC mercury inventory at a site analyzed in the EIS would not result in significant environmental impacts at that site. The Preferred Alternative would also support DNSC's long-term business plans for various depots and keep the stored mercury available for possible future uses.

Record of Decision Will Name the Selected Alternative

As the final step in the National Environmental Policy Act (NEPA) process, DNSC will issue a Record of Decision (ROD) following a period of at least 30 days after the availability of the EIS is announced in the *Federal Register*. The ROD will present DNSC's decision as to which mercury management alternative will be implemented, along with the factors considered in reaching that decision. It may specify Consolidated Storage, which is the Preferred Alternative in the EIS, another alternative, or a combination of alternatives. ■

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Public Comments Focus on Consolidated Storage Alternative

The majority of the comments received on the Draft MM EIS related to the Consolidated Storage Alternative; impacts on human health and safety; and environmental and economic impacts. Some of the issues raised by the commentors and DNSC's responses are provided below:

CONSOLIDATED STORAGE AND NO ACTION ALTERNATIVES

Comment: Commentors who opposed the Consolidated Storage and No Action Alternatives cited concerns about: human health risks from leaks, accidents, and terrorist acts; proximity of the storage locations to populated areas; adverse effects on property values and negative perceptions affecting economic growth in the surrounding communities; and adverse effects on the environment. Some suggested that DNSC obtain approval of state and local governments and the community before selecting a site for consolidated mercury storage.

Response: In its response, DNSC notes that decisions on mercury management will be based on the environmental analyses presented in the Final EIS, including health and safety, security, and socioeconomics, and other factors such as cost, strategic considerations, and public input. Decisions and the reasons for them will be announced in the Record of Decision. DNSC also outlines its rigorous public outreach program which included 12 public meetings nationwide: information on the MM EIS in the form of newsletters, fact sheets, reports, exhibits, a Web site, e-mail and toll-free telephone and fax numbers, postcards sent to households in the immediate vicinity of potential storage sites, and briefings for state and local officials and others.

SALES ALTERNATIVE

Comment: A number of commentors expressed support for the Sales Alternative. Some suggested a hybrid alternative that would include consolidated storage and sale of all or a portion of the inventory from the consolidated storage location. A few suggested

that the sale of existing mercury stockpiles would be preferable to new mercury mining. Others were concerned about or opposed to the sale of mercury. Some commentors said that any mercury sold on the open market would increase the amount of mercury in the global environment. Others expressed concern that sales of large quantities of mercury would depress mercury prices and result in the increased use of mercury.

Response: DNSC explains in its response that the sale of mercury alternative evaluated in the MM EIS includes two sub-alternatives: (1) sales at the maximum allowable market rate (assumed to be 5,000 flasks per year), and (2) sales to reduce mercury mining. Negligible to minor environmental and socioeconomic impacts would result from the Sales Alternatives. Risks to the public from normal opera-

tions and facility accidents would be negligible to low. If a hybrid alternative combining the Consolidated Storage and Sales Alternatives were selected, the environmental impacts would be bounded by impacts evaluated in the MM EIS.

The entire inventory of DNSC excess mercury could be sold to a mercury mining company with the agreement that mining would be reduced proportionately to compensate for the release of the DNSC mercury into the market. If the mercury were sold, it is expected that an agreement would be negotiated that would require the purchaser to sell DNSC mercury at a rate no greater than the rate of sale for newly mined mercury. The Sales to Reduce Mercury Mining Alternative could produce beneficial impacts by reducing impacts of mercury mining and refining.

STORAGE BUILDING DESIGN AND OPERATION

Comment: Some commentors expressed concern that storage buildings at sites evaluated in the EIS are not appropriate for mercury storage. Some questioned the mercury packaging and leak containment provisions, while others questioned whether the buildings are secure. Some said that they believe that the mercury is safely stored.

“DNSC HAS SUPPORTED PUBLIC OUTREACH throughout the EIS process and will continue to inform communities affected by the mercury management alternative that is selected.”

Cornel Holder, DNSC Administrator

Response: Mercury at the DNSC depots is stored in 76 lb (34 kg) capacity flasks sealed in airtight 30 gal (114 liters) drums. The flasks are separated by dividers inside the drums and rest on an absorbent mat that doubles as cushioning material. Flasks are enclosed in plastic bags and sealed with wire ties. Drum lids have half inch rubber gaskets, and a steel locking ring is bolted in place to seal the drum lid. The drums rest on catch trays on wooden pallets on sealed floors. The catch trays can contain the contents of several flasks. Floor curbing was recently installed in the mercury storage buildings at the New Haven, Somerville and Warren depots. Therefore, leakage of mercury in an amount sufficient to escape the warehouse is unlikely.

DNSC has safely stored mercury for more than 50 years. Periodic inspections would ensure that mercury storage containers are in good condition and leak free. Any defects in the packaging would be quickly corrected. Inspections would be conducted by appropriately trained DNSC or contract personnel.

Warehouses would be kept locked except for inspections and other periodic maintenance work. In addition to security, perimeter fencing, and closely controlled access comparable to the levels of protection at the current mercury storage sites, DNSC would work with local authorities to ensure that even the most unlikely scenarios would be handled properly.

HEALTH AND SAFETY

Comment: Many commentors expressed concerns about risks to public health and safety from storing the mercury, while others said that the mercury is safely stored.

Response: DNSC has safely stored mercury for more than 50 years. Because mercury is a hazardous material, DNSC imposes strict controls to prevent exposure or release to the environment or to personnel working in the storage locations. Risks to the general public from normal operations would be negligible at any of the candidate sites for all the alternatives considered.

ACCIDENTS AND NATURAL DISASTERS

Comment: Many commentors were concerned about the potential for adverse environmental and human health effects of accidents caused by natural disasters or human error. They referred to small spills and leaks of mercury and larger releases due to fire or natural disasters (e.g., tornados and earthquakes). Some were particularly concerned about the proximity of the storage facilities to populated areas. Some were concerned that adequate emergency response capability is not available to respond to an accident involving mercury.

Response: Risks to the general public from facility accidents would be negligible to low at any of the candidate sites for all the alternatives considered. This includes natural disasters such as earthquakes and tornadoes and human initiated spills, leaks, and other events. Population is not a major factor for human health risk because risks from mercury beyond the storage buildings would be negligible to low, even in the unlikely event of a release.

Plans are in place should a leak or spill occur. The mercury storage sites have approved Spill Prevention Control and Countermeasures Plans and Installation Spill Contingency Plans to ensure that the appropriate response to a spill is made. DNSC maintains equipment and trains the workforce at its mercury storage locations to respond to mercury spills. State and local emergency response teams are aware of the mercury storage. Should there be a mercury spill, it would be cleaned up to applicable standards.

TRANSPORTATION

Issue Summary: Some commentors were concerned about the potential for adverse environmental and human health effects of transporting the mercury stockpile, including vehicle accidents.

Response: Mercury has been transported as a common industrial commodity for many years. Transportation of mercury would be in accordance with DOT

hazardous material shipping requirements for using commercial truck and rail routes. The MM EIS evaluates the potential consequences of truck and rail transportation for both the Consolidated Storage and Sales Alternatives.

Risk is a function of both frequency and consequence, and the more miles traveled, the greater the opportunity for an accident to occur. Therefore, the greatest risk to the public would result from a truck transportation accident resulting in a mercury spill and fire under the Sales Alternative. This risk would be moderate if it were raining when the accident occurred. For the Consolidated Storage Alternative, risk from this accident would be low if the accident occurred while it was raining. The risk of a mechanically induced fatality occurring somewhere along the route would be moderate for the Sales Alternative and low for the Consolidated Storage Alternative.

TERRORIST ATTACK

Comment: Many commentors were concerned about the potential for adverse human health effects of sabotage of the mercury storage facilities. Some commentors cited attacks on the World Trade Center and the Pentagon as support for their concerns.

Response: DNSC provides armed security, perimeter fencing, and closely controlled access at the depots. DNSC also works with local authorities to ensure that even the most unlikely scenarios would be handled properly. DNSC has prepared a risk analysis of a deliberate aircraft crash and conducted vulnerability assessments to ensure that the mercury storage depots remain safe and secure. These internal reports, which indicate that the mercury stockpile is not a likely target for terrorists, are not available to the public for security reasons.

SOCIOECONOMICS

Comment: A number of commentors were concerned about impacts on property values due to a negative perception of mercury storage. Others

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were concerned about discouraging more desirable development in the region. Some were concerned about their community being labeled a “dumping ground” for wastes and other hazardous materials.

Response: DNSC has worked with the public throughout the EIS process to help them understand the potential risks presented by the mercury management alternatives so that opinions can be formulated based on facts and not perception. DNSC has safely stored mercury for more than 50 years and has taken additional precautions to ensure that it continues to be stored safely over the next 40 years by overpacking the mercury in steel drums and making modifications to the storage buildings. The EIS analyses indicate that there is negligible to low risk to the general public associated with consolidated mercury storage at any of the candidate sites.

COST

Comment: Some commentors questioned the validity of the mercury storage cost estimates and asked why the estimated costs differ greatly among the candidate sites.

Response: Cost estimates have been revised in the Final EIS. Facility cost

estimates provided in the Draft EIS were based on actual square foot and other costs being paid by the Government at or near the properties being considered as possible consolidation sites. Commentors on the Draft EIS noted that these estimated costs, particularly for the Western sites, appeared higher than would be expected. DNSC analyzed the basis for these estimates and found that the costs included assumptions that were not consistent for all locations. For these reasons, DNSC decided to treat basic facility costs generically. Actual facility costs in the event that the long-term consolidated storage alternative is chosen would be established based on best value to the Government during a procurement process.

STEWARDSHIP

Comment: A few commentors asked who would provide regulatory oversight of a mercury storage facility.

Response: DNSC mercury will remain U.S. Department of Defense (DoD) property, and DoD will continue to fund and oversee the mercury storage operations. The storage facility would be required to comply with all applicable state and federal laws and regulations. ■

TO VIEW THE FINAL EIS OR OBTAIN A COPY:

The Final EIS is available for review on the internet at www.mercuryeis.com and at 15 Information Repositories that are listed on the website. To obtain a paper copy or computer disk (CD) of the Executive Summary or the Final EIS (about 1000 pages), please contact:

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