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**Kentucky Citizens Advisory Commission/Citizens Advisory Board
Recommendation On Design Change # 34: Off-Site Shipment of Hydrolysate**

April 9, 2007

Recommendation:

All agent and energetic hydrolysate generated at the BGCAPP should be treated on site via the secondary treatment process identified in the 2003 Record of Decision - SCWO.

Basis for Recommendation:

- 1) Historical and current controversy associated with transportation of such waste through communities, including the generating community;
- 2) Historical and current controversy associated with treatment of such waste at potential reception communities;
- 3) Significant uncertainties surrounding the capability to safely transport such waste;
- 4) Significant uncertainties surrounding the capability to safely treat such waste at commercial facilities;
- 5) Government and community acceptability of the proposed preferred hydrolysate treatment contained in the BCAPP Record of Decision (i.e. SCWO);
- 6) Negative local economic impact of off site vs. on site treatment;
- 7) Deleting SCWO from the design would place the existing RD & D disposal permit in jeopardy. Such action would add additional time and cost to the execution of the project.
- 8) December 2006 MITRETEK Analysis Report found no appreciable savings with off-site shipment. - "In general, the expense of continuing to store munitions at the depots because of schedule delays associated with the off-site treatment of hydrolysate cancels out any potential cost savings for almost all scenarios analyzed in this study." (pg. 6-13).
- 9) November 2006 ACWA Lean Six Sigma Assessment found no appreciable savings in schedule or cost with off-site shipment. - "At the time of this analysis, due to the implications from the communities and the potential resultant permitting requirements this analysis finds that to ship hydrolysate off-site will not save time or money." (pg. 12).

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