

Colorado Chemical Demilitarization Citizens' Advisory Commission

April 28, 2010

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Dear Sir:

Members:

Col. Jeff Chostner, USAF (Ret.)
Tom Enrietta
Terry Hart, Vice Chair
Richard Robb
Joe Schieffelin
Rebecca Swanson
John Thatcher
Ross Vincent

The Colorado Chemical Demilitarization Citizens' Advisory Commission (CO CAC) has reviewed the February 2010 Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) for the proposed installation and operation of an Explosive Destruction System and/or an Explosive Destruction Technology (EDS/EDT) at the Pueblo Chemical Depot (PCD). The commission offers the following comments to the EA for your consideration.

1. Four alternative technologies are considered in the EA – Explosive Detonation System (EDS), Transportable Detonation System (TDS), Static Detonation System (SDS) and DAVINCH. No information is provided in the EA that details that these technology alternatives encompass the universe of technologies available for the destruction of complicated chemical munitions. It would be useful to have a discussion of other technologies that are available and why the four technologies discussed in the EA were chosen.
2. The 2002 Final Environmental Impact Statement (FEIS) that was the basis for the preferred technology chosen by DoD for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) reviewed the facility that is now under construction at PCD. The 2002 FEIS acknowledged the need to handle leaking and problem munitions (estimated to be 1,000 munitions) by a separate process yet to be determined. The 2010 EA minimally discusses four potential systems (all explosive technologies) and proposes to destroy up to 125,000 munitions, far beyond the original number, in order “to maintain continuity of United States chemical weapons destruction operations.” The

proposed destruction of 125,000 munitions responds to an alleged political need and not a technical issue that requires resolution in order to assure the safe, timely and cost effective destruction of the chemical weapons at the PCD. This alleged political need is not documented in the EA and is not supported by reliable information independent of the EA. The technical basis for the destruction of 125,000 weapons should be discussed and the reasoning should include reasons why these issues were not identified in the 2002 FEIS?

3. It has been further discussed in CO CAC meetings that the destruction of 125,000 chemical munitions will “facilitate destruction of the PCD stockpile by 2017.” Yet, the U.S. Army and the Assembled Chemical Weapons Alternatives (ACWA) program has repeatedly stated to the public and to Congress that the December 2017 deadline for weapons destruction at PCAPP will be accomplished. What has changed? The four alternative technologies proposed in the 2010 EA have never been used to destroy 125,000 chemical weapons in total – let alone at a single site. In fact, these technologies were designed to destroy recovered munitions from burial sites throughout the world. No indication is presented in the 2010 EA as to how this will be accomplished. The safety risks posed by expanding the use of these devices far beyond any previous experience are not discussed in the EA and are apparently ignored in reaching the conclusions of the FONSI.
4. Four proposed alternative actions have been proposed in the 2010 EA. With the exception of alternative D – the original proposed plan for dealing with approximately 1,000 problem rounds, yet to be explained or justified – no information is provided as to how these alternative actions were developed. In fact, Alternative B is seriously flawed because an EDS/EDT must be operational throughout the PCAPP operation in order to handle problem munitions. There is no way of determining problem munitions in advance. No reason is given as to why Alternative A was chosen as the “preferred” alternative or how are any of these alternatives an improvement over the 2002 FEIS.
5. The February 2010 EA does not provide any specifics regarding waste characterization for the four proposed technologies. Several references to other technology assessments are given, but none are specific to Pueblo or to specific wastes. If specific references are made to Pueblo then this information should be cited within the 2010 EA?
6. The 2010 EA provides little to no information on potential toxic air pollutants likely to be generated or emitted during construction or operations of any of the proposed technologies. Descriptions of pollution control methodologies are superficial and uninformative. Data are not provided to substantiate statements such as emissions “will be negligible and will not be considered.”
7. There is no discussion of the impacts of any of the technologies on water – groundwater, surface water, wetlands, water supply and/or storm water. How was the conclusion reached that the water needs of the facility will be “minor” on groundwater in comparison to other groundwater demands? No information is provided in the 2010 EA to substantiate this claim.
8. The community immediately surrounding PCD is primarily rural and agricultural. The area produces high quality, agricultural produce and farming and ranching in the area provides are a large number of migratory farm workers. This is by any reasonable definition an Environmental Justice community. No information is provided in the 2010 EA on how the

technologies and the proposed alternative actions could impact agriculture and the agricultural community.

9. It is virtually impossible to determine a cost-benefit ratio for any of the alternative technologies under consideration or the alternative actions without knowing the costs of the proposals and whether there would be an economic impact to the PCAPP program or to the community. To verbally state that costs don't make any difference is an absurdity. What is known, however, is that by implementing the Preferred Alternative Action as identified in the EA workers at PCAPP may be out of work six months earlier than previously estimated and that the operators of the alternative technologies would most likely come from Edgewood Chemical Biological Command (ECBC) and would not be local Pueblo workers.

The February 2010 EA does not provide sufficient data and analysis to determine whether the proposed project will have a significant impact to the Pueblo community or whether the impact is great enough to require a new EIS or a supplement to the 2002 FEIS. The 2010 EA is an inadequate document and a disservice to the community that is trying to understand the need for this project and its potential environmental impact.

The CO CAC does not oppose, in principle, the use of an EDS/EDT to dispose of mustard munitions categorized as "leakers" or "problem" munitions if an explosive technology can be demonstrated to be the best available option for that purpose. This number has been estimated to be about 1,000 munitions. The CO CAC is categorically opposed to the destruction of 125,000 chemical weapons in any EDS/EDT facility. No reasonable information has been made available to the Pueblo community that supports such a program.

The CO CAC will continue to devote its time and energy to reasonable suggestions for improving the design and performance of chemical weapons disposal at PCAPP. We will work with the Program Manager ACWA and Site Manager at PCAPP to complete all chemical weapon destruction by December 2017.

This letter was approved unanimously by the CO CAC at the regularly scheduled meeting on April 28, 2010.

Respectfully submitted,

Irene Kornelly
Chair, CO CAC

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Vice Chair, CO CAC