



Doug Hindman
Chair

Chemical Demilitarization Citizens' Advisory
Commission
Chemical Destruction Community Advisory Board
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Kent Clark
Craig Williams
Co-Chairs

To: Mr. Kevin Flamm, PM ACWA
Fr: KY CAC/CDCAB
Date: 14 December 2009
Re: "Bridging the Gap" with EDT @ BGAD

Dear Mr. Flamm,

We wish to first acknowledge the very positive relationship between ACWA and the Kentucky CAC/CDCAB (Citizens Advisory Commission/Chemical Destruction Citizens Advisory Board) and the people they represent.

We realize that no decision on the use of an Explosive Detonation Technology (EDT) has yet been reached.

At the same time, the Kentucky CAC/CDCAB and the EDT Working Group are quite concerned with the very limited timeframe being proposed for input on the decision to deploy an EDT for periods between end of operations at the CMA sites and the beginning of operations at the ACWA sites.

With these points in mind, we provide you the following positions and recommendation:

Positions:

- 1) The KY CAC/CDCAB does not oppose, in principle, the use of an EDT system to dispose of "problem" mustard munitions at BGAD. This would include leaking or suspect leaking mustard munitions that are over-packed, mustard munitions that have been drained and over-packed or mustard munitions that are found to be of a condition not suitable for processing in the BGCAPP facility or for which unacceptable human risk would be expected via manual processing.
- 2) The KY CAC/CDCAB reserve their endorsement of any EDT for application at BGAD until there is adequate demonstration, in the U.S., of the technical capability and environmental compliance of any such chemical weapon disposal approach. (see also KRS 224.50-130 (3) (a)).
- 3) Assuming the above criteria are met, the KY CAC/CDCAB via its EDT Working Group will assess and make recommendations on what elements of any evaluation criteria in selection of an EDT for BGAD should be prioritized in selecting a specific EDT for deployment.

4) Notwithstanding any such recommendations and any eventual selection of a specific EDT by ACWA for BGAD, the KY CAC/CDCAB would consider the use of EDT for the destruction of “problem” mustard munitions, and possibly other mustard munitions and non-contaminated M-55 Rocket Motors currently stored at the BGCA associated with chemical weapons disposal objectives.

5) The KY CAC/CDCAB unequivocally opposes the use of any EDT or EDS for the processing of nerve agent munitions or nerve agent contaminated materials associated with the Blue Grass stockpile that are not identified specifically in # 6) below.

6) The KY CAC/CDCAB reserves its final recommendation for processing, using EDT or EDS, any over-packed nerve agent munitions, or nerve agent munitions that are found to be of a condition not suitable for processing in the BGCAPP facility or for which unacceptable human risk would be expected via manual processing, until more technical and environmental data is presented for consideration.

7) The KY CAC/CDCAB does not believe the EDS (Explosive Destruction System) should be considered for deployment at BGAD for disposal of any of the stockpile, with the possible exception of munitions specifically described in #'s 1) and 6) above.

8) Permitting issues associated with EDT at BGAD need to be brought forward by ACWA, KDEP and BGAD in a timely manner, even beyond what is required by law, to ensure adequate public involvement in the permitting process.

9) The KY CAC/CDCAB recognizes the benefit of an EDT for its legacy capability in the ongoing mission of the Blue Grass Army Depot’s conventional weapons activities once the chemical weapons disposal mission is completed.

Recommendation:

- ACWA should include all the positions above in its presentations/recommendations to OSD scheduled for 15 December 2009.

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Signed:

Doug Hindman, Chair
Kentucky Citizens Advisory Commission

Kent Clark, Co-Chair
Kentucky Citizens Advisory Board

Craig Williams, Co-Chair
Kentucky Citizens Advisory Board

NOTE: Two voting members of the CDCAB did not support the above recommendation in its current form. Therefore, consensus on the positions contained herein was not attained.