

# CAC and DOWG Concerns and Recommendations to ACWA, Bechtel and DoD

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Redesign Efforts Under  
Consideration

# CAC Commitment to Project

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- Citizen Advisory Commission (CAC) is committed to the safe and effective destruction of the chemical weapons stored at the Pueblo Chemical Depot (PCD).
  - Neutralization/biotreatment, with as much as the process as possible completed on site, is still the safest and most publicly acceptable method for accomplishing this task, in the opinion of the CAC and the Pueblo community.
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# Support for Cost Containment

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- ❑ CAC supports the efforts of the Bechtel Pueblo Team (BPT) and the Assembled Chemical Weapons Alternatives (ACWA) program to contain the costs of the facility.
  - ❑ Cost containment should not jeopardize the safety and health of the workers, the community or the environment or jeopardize public support for the project.
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# Support for Cost Containment

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- ❑ Cost savings measures should increase safety and efficiency at the facility.
  - ❑ CAC and DOWG supports ACWA and BPT for including the lessons-learned trade studies in their redesign options.
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# General Issues of Concern

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- ❑ DoD required that the DOWG and CAC make recommendations without sufficient information on all options.
  - ❑ The impact of the design options on the local labor force remains unclear, both for the individual options and a combination of the options.
  - ❑ The fiscal and economic impacts of the design options to the State of Colorado and the Pueblo community have not been determined.
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# General Issues of Concern

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- ❑ The \$1.7 billion cap placed on the project by DoD is arbitrary and capricious.
  - ❑ The trusting, yet fragile, relationship between the Pueblo community, state, ACWA and BPT may be damaged by the continued indecisiveness over design/acceleration options and by DoD's lack of commitment to fully fund the Pueblo program.
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# General Recommendations

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- ❑ ACWA and BPT need to develop contingency plans in the event that off-site shipment of any waste streams are incorporated in the new design and become unfeasible for any reason.
  - ❑ During redesign, ACWA and BPT should begin to assess the political ramifications of off-site treatment options.
  - ❑ During the redesign effort the CAC and DOWG should have continued involvement.
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# General Recommendations

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- The CAC and Pueblo community should be informed of the potential Treatment, Storage and Disposal Facilities (TSDF) prior to any final decision on off-site shipment options.
  - CAC and DOWG need to know the number of loads of wastes to be shipped, method of shipment (truck or train) and packaging methods for any of the off-site shipment options prior to final approval.
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# General Recommendations

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- CAC and DOWG should be informed of the expected cost savings associated with each off-site shipment option. Cost savings should include all reasonably predictable costs whether they occur at PCAPP or elsewhere.
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# Off-Site Shipment of Dunnage

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- ❑ BPT and ACWA should continue the development of a methodology to determine whether wooden boxes and pallets are agent contaminated or uncontaminated.
  - ❑ Additional verification of the methodology should be conducted with live agent.
  - ❑ CAC and Pueblo community should have an opportunity to review the methodology test results.
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# Off-Site Shipment of Dunnage

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- ❑ Agent contaminated wooden boxes and pallets should be processed on-site. Methods should be discussed with and reviewed by the DOWG and the CAC.
  - ❑ Non-agent contaminated wooden boxes and pallets should be sent to a hazardous waste landfill for disposal, if methodology is viable.
  - ❑ Non-agent contaminated wooden boxes and pallets that are shipped off-site should not be incinerated or processed for reuse.
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# Off-Site Shipment of Energetics

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- ❑ CAC and DOWG must be satisfied that shipment of energetics (propellant, fuses and bursters) can be accomplished safely and without delays before any recommendation for shipment of energetics can be made by the CAC.
  - ❑ ACWA and BPT must prove that substantial cost-savings can be achieved prior to a recommendation for shipment of energetics can be made by the CAC.
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# Off-Site Shipment of Energetics

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- The methodology for the determination of non-agent contaminated energetics and for stability of the energetics needs to be verified.
  - Once a methodology for determination of stability and non-agent contamination is agreed to by CDPHE and EPA, it should be presented to the CAC and DOWG for discussion and review.
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# Off-Site Shipment of Energetics

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- ❑ Public concerns about the off-site shipment of energetics need to be addressed as a part of the RFP process to select one or more TSDFs that may receive the energetics.
  - ❑ Unstable and/or agent-contaminated energetics must be processed on-site. Methods should be discussed with and reviewed by the DOWG and the CAC.
  - ❑ BPT and ACWA must address the political and safety risks that may occur prior to a final decision being made to transport the energetics.
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# Early Enhanced Reconfiguration

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- ❑ BPT and ACWA must justify the cost benefit of Early Enhanced Reconfiguration (EER) in light of the increased risk to workers from double handling of the munitions.
  - ❑ BPT and ACWA must present to the CAC and DOWG additional performance data to demonstrate the feasibility, effectiveness and/or safety of EER.
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# Early Enhanced Reconfiguration

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- There are potential delays that may result from choosing the EER option. They include:
    - Redesign
    - Studies and/or testing to demonstrate the feasibility, effectiveness, and/or safety of EER
    - Permitting of the EER and potential storage units
    - Permitting of contingency treatment processes for any rejected munitions.
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# Off-Site Shipment of Agent Hydrolysate

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- ❑ ACWA and BPT must assess the potential political reaction from communities affected by any transportation of waste streams associated with the destruction of the chemical weapons at PCAPP.
  - ❑ The costs and benefits of this transportation option must include not only political risks, but cost of clean-up of any transportation accident, resolution of Environmental Justice issues, the consumption of water vs. the recycling of water, and loss of jobs in the Pueblo community.
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# Off-Site Shipment of Agent Hydrolysate

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- ❑ CAC and DOWG would like to know the compliance record of the receiving TSDF(s).
  - ❑ Based on past experience, acceptance issues pose real threats to hydrolysate shipment that could result in delays to the entire program.
  - ❑ Re-permitting of the facility based on this option may result in delays to the program.
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# Conclusions

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- The CAC and DOWG request that the program continue with the transparency and cooperative decision-making process that has been the hallmark of the Pueblo chemical destruction program.
  - The CAC and Pueblo community pledge their cooperation with ACWA and BPT throughout the destruction process.
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