

Colorado Chemical Demilitarization Citizens' Advisory Commission

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Mr. Kevin Flamm, Program Manager
Assembled Chemical Weapons Alternatives
Communications and Congressional Affairs
ATTN: AMSAW-CA, Bldg. E3331
5183 Blackhawk Road
Aberdeen Proving Ground, MD 21010-5424

Dear Mr. Flamm:

At the meeting of the Colorado Citizens Advisory Commission (CO CAC) held on Wednesday, December 9, 2009, the commission gave you a preliminary draft of concerns that we had with the "Bridging the Gap" program described at the meeting. We also promised a final letter that formally expressed our concerns. Throughout this letter, the use of the acronym EDT is intended to include the Explosive Detonation System (EDS) developed by the non-stockpile program and/or the three Explosive Detonation Technologies (EDT) developed by three commercial vendors.

The CO CAC does not oppose, in principle, the use of an EDT system to dispose of mustard munitions categorized as "leakers" or munitions posing technical problems, because they cannot be safely destroyed in the PCAPP. This has long been our position and it has not changed.

The CO CAC cannot endorse any specific EDT system for use at PCAPP at this time due to a lack of information about the technical capabilities of the systems, reliability and maintenance concerns and the environmental impacts and compliance of any such system within the U.S. In addition, none of these systems have supplied information that would provide the CO CAC with confidence that the systems could be scaled up to the extent that would allow for the destruction of 125,000 weapons.

The three commercial EDT systems while in use in many places around the globe are troublesome to some members of the CAC and the Pueblo community because of their dependence on engineered containment of explosion for the destruction of the mustard agent. While this may not be an accurate understanding of the process, this is what is perceived at

this time and only points to the lack of information that is available to the public.

The CO CAC has questions about whether the “Bridge the Gap” proposal is integral and a part of PCAPP or separate from PCAPP. Your response on Wednesday to this question indicated that we should consider the program a “PCAPP Annex” and did not help to clarify the issue. If an EDT system is separate from the PCAPP then indeed the issues of combustion, treatment of wastes and disposition of wastes resurfaces. If an EDT is an integral part of PCAPP the use of the system in a large scale way will divert weapons that should be destroyed in PCAPP in a manner that is safer and more controlled and that has been well discussed by the Pueblo community.

The CO CAC is opposed, at this time, to diverting 125,000 munitions to the EDT system. The use of any of the proposed EDT systems would add complexity to the PCAPP program.

CO CAC requests that permitting issues related to the use of any EDT system for the destruction of “leakers” and problem weapons be brought forward to the Colorado Department of Public Health and Environment (CDPHE) and the Permitting Work Group (PWG) at the earliest possible timeframe for a thorough evaluation.

Based on the information currently available to the CO CAC about the EDT systems, it is not clear that ACWA can carry out the EDT program in the time frame that has been proposed, if only because of regulatory and environmental requirements.

The CO CAC has always been willing to considering suggestions for improving the design and performance of the chemical weapons disposal project in Pueblo. We have and will continue to devote time and energy to these requests. No matter the final disposition of this program, we need to continue the dialogue about the destruction of the chemical weapons stored at the Pueblo Chemical Depot, specifically the “leakers” and problem weapons.

Respectfully yours,

Irene Kornelly
Chair, CO CAC