

Colorado Chemical Demilitarization Citizens' Advisory Commission

February 22, 2017

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Conrad Whyne
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Assembled Chemical Weapons Alternatives
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Delivered by email on February 23, 2017

Members:

Jeff Chostner
Terry Hart, Vice Chair
Ken Griffin
Doug Knappe
John Norton
Jeff Riesler
Ross Vincent

RE: Record of Environmental Consideration for construction and operation of a loading dock/shipment terminal for the shipment of mustard agent hydrolysate from the Pueblo Chemical Agent-Destruction Pilot Plant

Dear Mr. Whyne:

Thank you for the opportunity to comment on the proposed action discussed in the Record of Environmental Consideration. The Colorado Citizens' Advisory Commission (CO CAC) is well aware that a public comment period for a REC is not a common occurrence.

Over the past 15 years, the CO CAC has consistently opposed the transportation of hydrolysate from PCAPP. This position is well documented in letters to you and your predecessors, as well as in minutes of the CAC meetings. As the CO CAC, we continue to support the treatment of hydrolysate on site and oppose the off-site shipment of hydrolysate.

The Bio-Treatment System has been successfully tested and many lessons have been learned from these tests. We have great confidence that this system will be successful and that shipment will not be necessary.

The CO CAC has also considered the issue of cost. The costs at PCAPP are already on the rise. No money will be saved by not building the Bio-Treatment System. In fact, money will be wasted if the system is allowed to go unused. The cost of building the loading dock/shipment terminal, while probably not a huge cost, should be deferred until such a time as everyone is certain that shipment must occur. Waiting until the shipment is certain would also save dollars for other needs. Of course, if this loading dock has other uses, then these uses should be

disclosed and a decision made on the total needs, not just for the shipment of hydrolysate.

The CO CAC is pleased with the progress made at PCAPP in the destruction of the chemical weapons stored at the Depot and look forward to the beginning of full-scale operations including the treatment of the hydrolysate in the Bio-Treatment system.

Sincerely,

  

Irene Kornely
Chair, CO CAC

Terry Hart
Vice-Chair CO CAC

John Norton
Chair, Bio-Utilization Group
