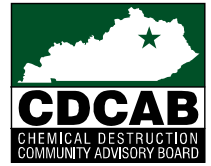




Chemical Demilitarization Citizens' Advisory Commission
Chemical Destruction Community Advisory Board
105 5th Street, Suite 206
Richmond, KY 40475
859.624.4700 / 859.986.7565



Doug Hindman
Chair

Kent Clark
Craig Williams
Co-Chairs

To: Mr. Conrad Whyne, ACWA Program Executive Officer
Fr: KY CAC/CDCAB
Date: 31 January 2012
Re: EDT @ BGCAPP

Dear Mr. Whyne,

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

We realize that discussions on the use of an EDT (Explosive Detonation Technology) are reaching a decision point and appreciate ACWA's consideration of this recommendation in their deliberations.

We would also wish to recognize the ACWA BGCAPP team, BPBG, and the EDT Working Group of the CDCAB, BGCA/BGAD, along with the National Research Council (U.S.) Committee to Review Assembled Chemical Weapons Alternatives Program Detonation Technologies, and the U.S. Army Chemical Materials Agency and their Project Manager for Non-Stockpile Chemical Materiel, for the diligence shown in engaging in the many aspects of the proposed use of EDT at Blue Grass.

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

Positions:

- 1) The KY CAC/CDCAB recognizes that the results of the X-ray Assessment of the Mustard munitions at the BGCA reflects an extremely high probability that attempting to process these munitions in the BGCAPP facility would likely result in repeated and avoidable risks to the workforce; inhibit accelerated disposal of the Kentucky stockpile; and, put Kentucky further behind in our international commitments within the context of the Chemical Weapons Convention.
- 2) The KY CAC/CDCAB believes the deployment and use of the EDT at the Anniston Chemical Demilitarization Facility (ANCDF) fulfills many of the requirements of KRS 224.50-130 (3) (a)). However, there remain questions concerning whether the experience at Anniston sufficiently demonstrates the ability to meet the following requirement within the section: *"During the occurrence of malfunctions, upsets, or unplanned shutdown, all quantities of any compound listed*

in subsection (2) of this section shall be contained, reprocessed or otherwise controlled so as to ensure that the required efficiency is attained prior to any release to the environment.”

3) The KY CAC/CDCAB, in concert with other stakeholders, wishes to see a continuous investigation of the “hold-test-release” capabilities of potential agent emissions with any EDT considered for the Blue Grass disposal effort, while recognizing that such investigations should not be allowed to significantly impact EDT deployment.

4) The KY CAC/CDCAB unequivocally opposes the use of any EDT or EDS (Explosive Destruction System) for the processing of nerve agent munitions or nerve agent contaminated materials associated with the Blue Grass stockpile.

5) The KY CAC/CDCAB does not believe the EDS should be considered for deployment at BGAD for disposal of any of the stockpile.

6) Permitting compliance issues associated with EDT at BGAD need to continue 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.

7) Compliance with, and public involvement in, the National Environmental Policy Act (NEPA) shall be attained prior to procurement of any EDT for Blue Grass.

8) The KY CAC/CDCAB recognizes the potential 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:

The KY CAC/CDCAB recommends the use of an EDT system to dispose of mustard munitions at BGAD assuming the areas of compliance identified above are met.

Signed:

Dr. Douglas Hindman, Chair
Kentucky Chemical Demilitarization Citizens Advisory Commission

Kent Clark, Co-Chair
Kentucky Chemical Destruction Citizens Advisory Board

Craig Williams, Co-Chair
Kentucky Chemical Destruction Citizens Advisory Board

--