



DEPARTMENT OF THE ARMY
PROGRAM EXECUTIVE OFFICE, ASSEMBLED CHEMICAL WEAPONS ALTERNATIVES
PUEBLO CHEMICAL AGENT-DESTRUCTION PILOT PLANT
45825 HIGHWAY 96, EAST
PUEBLO, COLORADO 81006-9330

October 18, 2018

Ms. Irene Kornelly, Chair
Colorado Chemical Demilitarization Citizens' Advisory Commission
1602 Clemson Dr.
Colorado Springs, CO 80909

Dear Ms. Kornelly:

I am writing in response to your letter dated September 6, 2018 with comments on the Proposed Installation and Operation of Static Detonation Chambers (SDCs) at Pueblo Chemical Depot (PCD), Pueblo, Colorado, Environmental Assessment. Thank you for your assistance regarding the potential use of SDCs to augment the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP).

Responses to your comments are as follows:

Comment 1:

If an individual was not familiar with this aspect of the program, the distinction between 1, 3 and 6 SDCs might be confusing. Cleaning this up in the narrative might be as simple as dividing the paragraphs, so that each unit (1, 3, 6) is listed in separate paragraphs. This is particularly true in talking about employment for construction and operations.

Response to Comment 1:

The Environmental Assessment (EA) states that the preferred alternative is for 3 SDCs and continued operation of the PCAPP Main Plant. The use of 6 SDCs was analyzed in case the PCAPP Main Plant cannot maintain a consistent, high throughput operational status to meet the December 31, 2023 mandate. There is no impact to the results of the EA due to this comment. A sentence has been added to the Finding of No Significant Impact (FNSI) emphasizing that the preferred alternative is 3 SDCs and continued operation of the PCAPP Main Plant.

Comment 2:

On pages 1-9 and 2-9, it is unclear whether the Pueblo Country Certificate of Designation (CD) will be a modification or a new CD. It will be a new CD.

Response to Comment 2:

There is no impact to the results of the EA due to this comment.

Comment 3:

Page 3-33 Perception of risk to crops. This has been a long standing issue in Pueblo, most prominent when incineration was the technology of choice. When the neut-bio was chosen, the issue died down. Now it has returned, because the public is unclear about emissions from the SDC. Please emphasize that SDC emissions are less than emissions from the PCAPP facility. Perhaps this will be well understood when the Multi-Pathway Health Risk Assessment (MPHRA) is complete and the draft Resource Conservation and Recovery Act (RCRA) permit issued.

Response to Comment 3:

Emissions are discussed in Section 3.1.3 of the EA. Emissions were evaluated on the Anniston SDC while processing mustard agent. Risk assessments conducted using these emissions indicated that risk and hazards to human health, from operation of the SDC, were within target limits set by the Environmental Protection Agency (EPA) as protective of human health. These studies considered deposition onto land, uptake of contaminants by crops (both plants and animals) and consumption of these crops by humans. Section 3.1.3 of the EA also contains a comparison of emissions from SDCs to PCAPP Main Plant. The conclusion is that emissions from the SDCs are significantly less than emissions from the PCAPP Main Plant when processing the same total mass of agent. A MPHRA will be conducted as part of the RCRA permitting process that considers cumulative effects from emissions from both the PCAPP Main Plant and the SDCs on human health. The SDCs will be operated in compliance with the RCRA permit and in a manner protective of human health. We will continue the open dialogue with stakeholders as the PCAPP project continues to ensure we address concerns and provide the most current data and information available. There is no impact to the results of the EA due to this comment.

Comment 4:

Page 3-59 Transportation Risk. While I do not have the information to argue with the transportation risk assessment, the perception that this waste came from chemical weapons, the waste is more toxic than anything else on the highways. I am concerned that someone in the state or federal government will attempt to shut down transportation based on this misperception. (See Navy transportation of Napalm about 15 years ago.)

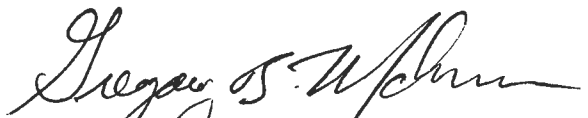
Response to Comment 4:

Section 3.1.8 of the EA clearly defines the wastes that will be produced during operation of the SDCs. The wastes will be similar to wastes that are currently being generated by the PCAPP Main Plant. Although there is always the potential for a stigma

associated with waste derived from chemical weapons, the open dialogue with both stakeholders and waste transporters regarding waste products and ultimate disposal should help minimize potential issues. There is no impact to the results of the EA due to this comment.

Again, thank you for your comments. I look forward to continuing our partnership as we work toward beneficial solutions for the destruction of the chemical stockpile at the Pueblo Chemical Depot.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory B. Mohrman". The signature is fluid and cursive, with a long horizontal stroke at the end.

GREGORY B. MOHRMAN
Site Project Manager
Pueblo Chemical Agent Destruction
Pilot Plant

Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP)
 Field Office Policy Statements, Plans, and Procedures Manual
Attachment 2 – PCAPP FO Correspondence Review/Signature Traveler
PCAPP PRC 1-4



PCAPP FO Correspondence Review/Signature Traveler	
Letter No.: <u>Ms Irene Kormally</u> Subject: <u>Response to Comments</u> <u>mea for SPCs</u>	Date: 10/15/18
Technical POC (If Applicable):	Date:
Administrative Assistant (Formatting) Stelma Wilson	Date: JAW 10/15/18
Administrative Contracting Officer:	Date:
Property Administrator:	Date:
Deputy Site Project Manager – Engineering and Systemization:	Date:
Deputy Site Project Manager – Compliance and Technical Support: Walter Shui	Date: 10/16/18 WWL
Site Project Manager: Greg Mohrman	Date: Shui 10/18/18
 Tami Quandt	 10/18/18