



Chemical Demilitarization Citizens' Advisory Commission
Chemical Destruction Community Advisory Board
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Doug Hindman
Chair

Reagan Taylor
Craig Williams
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To: Mr. Michael Abaie, ACWA Program Executive Officer
Fr: KY CAC/CDCAB
Date: 28 August 2020
Re: SCWO @ BGCAPP

**RECOMMENDATION TO PROGRAM EXECUTIVE OFFICER ASSEMBLED
CHEMICAL WEAPONS
ALTERNATIVES (PEO-ACWA) ON SCWO**

Dear Mr. Abaie,

The Blue Grass community with great reluctance recognizes the need for offsite shipping of liquid waste streams necessary for disposal operations to proceed effectively along the line of the current schedule. In the spirit of eliminating the safety risk to the Blue Grass community by continued storage of chemical weapons or its secondary waste, actions that cause delays and uncertainty in the disposal schedule are unacceptable and off site shipment will be necessary to sustain continuous munitions destructions operations.

Accepting that offsite shipment is necessary to move forward with elimination of the risk of chemical weapons to the community, the Blue Grass community believes that SCWO remains as a valuable chemical process for treatment of such materials. The community recommends that the responsibility for fully maturing the SCWO to a system capable of routinely supporting chemical weapons disposal and possibly other DOD liquid waste be transitioned to the US Army Chemical Materials Agency (CMA). CMA has an enduring mission for safe and environmentally complaint disposal of recovered chemical weapons from the past DOD practice of disposal by burying chemical weapons. Having SCWO as another tool in the CMA portfolio of treatment technologies is beneficial to this enduring Army mission and the potential for treating other DOD waste streams by a non-incineration method. CMA as the end point customer and operational requirements generator for this technology should team with the US Army Chemical and Biological Center (CBC) for technical support and other Army elements for programmatic support as required. CBC has the technical expertise and was the technical support for the ACWA program during the early evaluation of candidate technologies at the front end of the ACWA program. CBC can assemble and execute the necessary program to resolve operational issues with SCWO and perfect SCWO as a routine tool supporting hazardous waste disposal. After demonstrating SCWO as capable and safe to operate, a portion of the three unit SCWO

system would transfer to and be retained at Blue Grass Depot to treat appropriate Depot waste streams and waste products from new/future missions executed by the Depot.

Having stated the above, we insist that no DOD or private hazardous waste should be transported to the Depot without approval of the Madison County Judge Executive and officially appointed citizen organizations

All measures to reduce liquid waste generation are also recommended. The SC should be incentivized to reduce general plant liquid waste such as wash down water, decontamination solution, lab waste and other sources through a multi-pronged approach. The SC would be tasked by PEO-ACWA to catalog all liquid waste streams, conduct a formal review and study processes to reduce the quantity of liquid waste generated at these sources and routinely monitor the quantities from individual sources as generated. SC efforts to reduce liquid waste and increase discipline in the plant to maintain the lowest generation rate compatible with safe operations would be incentivized. PEO-ACWA should also direct an engineering analysis of the feasibility to process various liquid waste streams through the reverse osmosis system to recover and reuse water and reduce the volume of waste being shipped offsite. As the full suite of explosive disposal capability, the SDC 1200 and 2000, is brought on line and operational experience solidified, PEO-ACWA and the SC should conduct a study of the feasibility of increasing the through put of munitions being processed in the SDCs to further reduce liquid waste generation. A formal plan and schedule for increased processing through the SDCs should be presented to the CAC, CBCAB and PWG along with periodic briefings on SDC processing results and plan implementation.

Technology options for treating the offsite wastes should be considered including, but not limited to, deep-well injection and bio-treatment and available methods other than incineration.

PEO-ACWA, the System Contractor and receipt point contractor should develop a public outreach plan and execution process, including principles contained in Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), directed at the local community of the proposed receiving site of offsite shipments. The plan should contain information on the chemical composition of the material being shipped, quantity, proposed schedule for delivery, delivery process, shipping information and safe guards, notification process for emergency response for each state and jurisdiction that the shipments will traverse, how the offsite treatment process will be executed, applicable emission standards and monitoring procedures, how the local community at the receipt point will be routinely advised as to the actual processing data and emissions. An open dialogue with the local diverse community should be established prior to shipment to address community concerns and potential upgrades to the treatment process to mitigate such concerns.

Reagan Taylor, Madison County Judge Executive
Co-Chair – CDCAB
Reagan Taylor

Douglas Hindman, Chair –CAC
Douglas Hindman

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