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# Common Sense

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## Utah Incinerator in the News \_\_\_\_\_

### \_\_\_\_\_ Letters, secret documents confirm Utah incinerator still endangering the public, workers and the environment

From August 1999 to January 2000 the Chemical Weapons Working Group (CWWG) received handwritten letters and internal reports detailing the flawed facility's continued endangerment to workers, the public and the environment. The documents, which CWWG claims were sent by the plant's safety manager, portray the plant as "limping along" with equipment malfunctions, worker exposures and nerve agent migration.

On March 22 CWWG made public the 1500 pages of documents that had been sent during a five-month period allegedly by Steve Jones, a former whistleblower who returned to the Tooele, Utah facility as the plant's Chief Safety Officer last summer after a federal court ruled he had been illegally fired. The problems and incidents detailed in the handwritten notes and previously secret reports include the following.

- It was discovered in 1999 that the method used to calculate nerve agent concentrations allows false assumptions to be made so that nerve agent levels are underestimated. When EG&G (the Army's contractor operating the Utah facility) managers wanted to review all previous calculations to determine if at any time in the past workers had been exposed to unacceptable levels of agent or if unacceptable amounts of agent had been released to the environment, Army officials would not allow the review.
- A TOCDF employee exposed to GB still tested positive for nerve agent presence after stripping naked and being washed down twice with bleach.
- Workers' protective suits partially melted when they entered one of the liquid incinerators to replace fire bricks before the furnace had cooled sufficiently.
- It is quite possible that the nerve agents GB and VX are mixed together in some munitions and that the agents have been mislabelled. However, the agent monitors at the incinerator can detect only one nerve agent at a time and the Army refuses to allow the installation of multi agent monitors.
- Data indicates that during a chemical incident nerve agent migrated to the outside environment from the Munitions Disposal Building, although a report on the event concluded that there was no migration.

- Nerve agent vaporizes off the rocket feed chutes leading to the Deactivation Furnace, sending up clouds of agent which migrate into adjacent rooms as fugitive emissions.
- Dropping steel I-beams down into a rocket feed chute was a procedure used to dislodge M-55 rockets jammed in the chutes.
- The facility's engineers consider the liquid incinerators to be fatally flawed.

### \_\_\_\_\_ On national tour ex-permit chief charges Army engaged in fraud and hid environmental violations to gain Utah permit

In mid-January, Gary E. Harris, the former Permit Coordinator at the Tooele, Utah chemical weapons incinerator, held news conferences in D.C., Utah and Oregon, revealing that his job was threatened unless he agreed to submit false data and withhold vital environmental information to get the facility permitted.

Speaking at the National Press Club in D.C. January 11, Harris said, "Many questionable practices that were not environmentally protective, safe or legal occurred at Tooele during my five years of employment there, and many documents were submitted to Utah regulators by the Army and its contractors that were dishonest or misleading. As Permit Coordinator I was directed to submit modifications to the plant that did not comply with Federal Law. I reported health, safety and environmental issues to the contractor and the Army which I was directed not to bring to the attention of the State under the threat of losing my job."

Harris provided a list of more than 100 improper activities at the incinerator, allegations he has sworn to under oath in a deposition for a Utah legal proceeding. His specific charges include the following.

- Political influence was applied by the Army to "fix" Utah process to cover-up dangerous practices and avoid

**Misstatements  
about  
incinerator's  
safety impel  
CWWG to release  
documents**

See story Page 13.

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## Documents show incinerator is still a danger (continued from Page 1)

In the letters, it is stated that Army managers conspired to obstruct justice by encouraging employees to mislead the judge during the June 1999 federal trial in Salt Lake City and by collaborating with sympathetic state regulators. "PMCD [The Army's Office of the Program Manager for Chemical Demilitarization] threatened to fire anyone who didn't testify 'correctly' during the trial," reads the letters, "so they lied or just played stupid... The real problem here is the state completely works with PMCD to find ways to circumvent the laws and permit." Summing up the Utah facility, it is stated, "In total it looks like incineration is a failed technology."

## Army engaged in fraud to gain Utah permit (continued from Page 1)

*Clearly  
Utah state  
regulators  
are lap dogs,  
not  
watch dogs.  
And they  
know only  
one trick--  
roll over.*

*--Chip Ward*

public review and comment. The Utah permit did not reflect the facility actually built.

- The incinerator's Health Risk Assessment was politically adjusted to obtain desired results by removal of data about people living and farming close to the incinerator facility.

- Incinerator trial burns were falsified to avoid revealing that the Metal Parts Furnace cannot safely burn gelled agent in munitions and containers.

- Information was purposefully withheld from the regulators that a key component of the planned agent destruction process, the Dunnage Incinerator, designed to handle agent-contaminated material like protective suits, could not work.

- Data was manipulated to conceal the fact that agent was not staying in the Deactivation Furnace long enough to be destroyed.

- Staff were directed not to incorporate "Lessons Learned" from the Army's facility in the Pacific, such as the fact that the incinerators could not

completely incinerate mustard agent, into the Utah design and not to contact any sites under construction to share information on problems.

- Nerve gas residues were improperly disposed of off-site.
- Nearby communities never agreed to provide emergency response for accidents as required by the permit.

The facility has been severely criticized by former plant officials. The Utah facility's Safety Chief, Steve Jones, was terminated for refusing to certify the plant was safe but returned to his job after the U.S. Department of Labor found that he had been illegally fired for raising safety and environmental concerns. Subsequently, the facility's General Manager, Gary Millar, resigned charging that the incinerator remained unsafe. Then the Hazardous Waste Manager, Trina Allen was forced to resign after raising concerns about environmental violations. A Department of Labor judge ruled in favor of Allen on her whistleblower retaliation complaint.

CWWG Attorney Mick Harrison, who accompanied Harris on the tour, stated, "Gary Harris' revelations demonstrate that the Army knowingly violated the law, covered up known dangers and corruptly influenced state agencies to proceed recklessly with a technology they know does not work."

Commenting on the state regulatory agency's complicity in the permit fraud, local Utah activist Chip Ward, a participant in the Salt Lake City news conference, said, "Clearly Utah state regulators are lapdogs, not watchdogs. And they know only one trick--roll over."

*Common Sense* is published by the **Kentucky Environmental Foundation** (KEF), the non-profit lead organization of the **Chemical Weapons Working Group** (CWWG), a coalition of grassroots organizations in the U.S., the Pacific and Russia working toward the safe disposal of chemical weapons. CWWG site contacts are listed below. KEF distributes newsletters on a quarterly basis, please call the KEF office at 606-986-0868 for submission deadlines. Suggestions are welcome.

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*Russia:* Call the KEF office for contact names and groups in Russia

*CWWG calls for his resignation and four months later:*

## Chem Demil Program's Top Gun Resigns

On June 16, 1999 CWWG called for the resignation of the Deputy Assistant Secretary of the Army for Chemical Demilitarization, Dr. Theodore Prociv, for lying about available funds to demonstrate all advanced technologies identified by the Assembled Chemical Weapons Assessment (ACWA) program. Less than four months later, Prociv announced he would be leaving his Army office to accept a position in private industry effective November 1.

CWWG members based their demand for Prociv's resignation on Pentagon Comptroller reports indicating that, contrary to Prociv's claim that the \$25 million needed to fulfill the Congressional directive for complete ACWA testing was unavailable, close to \$1 billion in the budget hadn't been expended.

In the June letter to Secretary of the Army Louis Caldera, CWWG spokesperson, Craig Williams wrote, "Dr. Prociv has misrepresented the fiscal situation within the Chemical Stockpile Disposal Program to hundreds of citizens, Congressional Staff and his own superiors in an effort to derail the objectives of the Alternative Chemical Weapons Assessment (ACWA) program.

Under these circumstances, Mr. Secretary, I respectfully request that you ask for, and insist on, the resignation of Dr. Prociv."

Although Prociv had an opportunity to live up to his contentions to the ACWA representatives and others that he supported the efforts to ensure the safest possible disposal of chemical weapons, it was obvious his real agenda was to keep the incineration program alive while sabotaging the alternatives process."

Early in 1999 the House Defense Appropriations Committee moved to cut the entire budget of Prociv's office for what they called disturbing evidence of "individuals employed by the DoD having visited the Congress with paid consultants to promote the chemical agents and munitions destruction [incineration] program."

Also in 1999, consultants from Prociv's office were sent to Pueblo, Colorado to "pressure" local elected officials to "lobby" Congress to move forward with the incineration program. This activity has been reported to the Pentagon Inspector General's Office and is under investigation.

Prociv's behavior contradicted his

statements to Congress in which he iterated that, "the Chemical Demilitarization Program is pro-destruction; not pro-incineration." His office consistently misrepresented its agenda on technologies and the capability of the incineration program to complete the mission in compliance with the Chemical Weapons Convention (CWC).

Now that a major stumbling block to safe disposal is gone, CWWG's hope is that his replacement will allow the best interests of the public and the environment to become the Army's top priority.

*Paid consultants  
are sent to Pueblo,  
Colorado to pressure local  
elected officials to lobby  
for incineration;  
however, CO CAC votes  
against burning*

*See story Page 8.*

## Army report undermines key argument for incineration

An internal U.S. Army Soldier, Biological and Chemical Command (SBCCOM) report, made public October 21 1999, revealed that the rush to incinerate chemical weapons is based on false arguments. The document, titled "Chemical Stockpile Storage Stability Status" and dated October 8, 1999, concludes "there is no apparent trend toward increased or decreased leak rates in the chemical stockpile."

For years Army officials have asserted that a growing risk of nerve gas leakage, particularly from spontaneous explosion of stored M-55 rockets or aging agent containers, mandated rapid incineration and prohibited deploying advanced technologies.

The Army has proclaimed M-55 rockets to be the most risk-significant item in the U.S. stockpile and has defended its 1984 decision to use incineration in large part based on the danger posed by storing these munitions.

The report specifically addresses concerns about the M-55 rockets, observing, "The results indicate that normally stored (that is, non-leaking rockets and undetected/unoverpacked leaking rockets) M-55 rockets can dissipate sufficient heat to prevent autoignition. The results for overpacked leaking M-55 rockets indicate

that the autoignition probability is low but cannot be ruled out." The overpacked rockets have been segregated from the rest of the stockpile to eliminate the risk within the igloos where large numbers of "normally stored" rockets reside.

As for ton containers filled with the agent HD (mustard agent) which incineration advocates claimed were at risk from drain plug leakage, the report said, "There was corrosion noted on some of the tested plugs however there were more than sufficient threads engaged to preclude any cause for concern. The survey indicates no increasing trend in leakers or severe corrosion problem, hence the recommendation was made to maintain the current visual surveillance program."

The Army's rhetoric--their 'sky is falling' campaign about storage risk--is debunked by data used in the October internal report. SBCCOM--the branch of the Army responsible for storage--has documented that the fundamental assumptions of the chemical weapons incineration program are false.

There *is* ample time to implement advanced agent destruction technologies which pose less threat to human health and the environment.

# PCBs and your Health: a Little Goes a Long, \_\_\_\_\_

The U.S. Environmental Protection Agency is prepared to grant a "national" permit to the Army to burn PCBs in chemical weapons incinerators.

Is it safe or necessary to burn PCBs, even in small amounts? No!

Read these facts and consider the alternatives.

## What are PCBs?

Polychlorinated biphenyls (PCBs) are chemicals known to cause cancer, birth defects, reproductive and immune system disorders, and other illnesses. PCBs were first manufactured in 1929 and were used for decades by industry as insulation for electrical systems. These chemicals were discharged into the air, water and soil directly from industrial facilities, and are still entering the environment from sources such as landfills and other dump sites. Even though production of PCBs was stopped in the late 1970s due to its toxicity, up to 70% of manufactured PCBs may still remain in use or in the environment.

PCBs are not found "naturally" in the environment, but they are found everywhere in the environment. PCBs are known to exist all over the world because they can migrate through the air, water and the food chain, far from their original source.

## How do PCBs affect human health?

Humans are exposed to PCBs primarily through the food we eat. Similar to other persistent chemicals, PCBs released into the air, water and soil eventually enter the food chain, where they accumulate in fatty tissues -- such as those in meat, fish and poultry. Children are most vulnerable to the effects of these toxic chemicals: infants are exposed to PCBs while in the womb through their mothers' blood, and later through their mothers' breast milk.

You do not have to live near a PCB source to suffer health consequences. For example, Inuit peoples in remote northern Canada -- where no PCBs have ever been produced -- have body levels of PCBs 10 times higher than Canadians living in southern urban areas. This is because the Inuit diet consists primarily of high-fat sea mammals, in which PCBs and other persistent chemicals have accumulated.

Over the last 30 years, most of the research on the health effects of PCBs has focused on the immediate effects of PCB exposure (i.e. "chloracne," a skin disorder) and cancer. Studies of the effects of PCBs on animals all conclude that PCBs cause cancer, and research on human workers exposed to PCBs shows an association between these exposures and increased incidents of cancer and higher cancer mortality rates.

However, more recent studies are focusing on the non-cancer effects of PCB exposure, including developmental, reproductive, nerve system and immune system effects. A variety of studies from the past several years conclude that infants exposed to PCBs in the womb had poor developmental growth (e.g. slowed reflexes, motor skills, cognitive function), lower birth weight, stunted growth, lower IQ scores and numerous other disorders.

## What level of exposure to PCBs is considered dangerous?

It only takes exposure to a tiny amount of PCBs to cause negative health effects. Due to the persistence of PCBs in the environment and the food chain, we all have PCBs in our bodies. Scientists estimate that the U.S. population has from less than 1 part per million (ppm) to more than 3 ppm in our body tissue. Research on mothers and infants' PCB exposure in North Carolina, Michigan and in the Netherlands show that such "normal" levels of PCBs may cause negative health effects. Given that PCBs accumulate in the food chain and in our bodies, and that we already have enough PCBs in our bodies to cause harm, there is no such thing as a "safe" level of additional exposures!

## Is it safe to incinerate PCBs?

No! Incinerators release thousands of toxic chemicals through smokestack emissions, ash and other liquid and solid wastes.

During trial burns for PCBs destruction, the Army's chemical weapons incinerator in Utah did not destroy PCBs to the level required by federal environmental regulations. In Utah, the Army claimed that the low destruction efficiency of PCBs occurred because PCBs were present elsewhere in the incinerator equipment -- although their own analysis of this theory turned up no additional sources of PCBs. Neither the Army nor EPA has yet proven that chemical weapons incinerators can effectively meet regulatory standards for PCBs destruction.

Even incinerators which operate within regulatory standards are not safe, because:

- 1) these standards allow the release into the air of toxic chemicals and assume that these chemicals will cause harm; and
- 2) these standards do not fully measure the amount of PCBs coming from a facility, either from air emissions or other emissions such as incinerator ash, brine or liquid waste.

Is an incinerator operating with unprotective air emissions standards for PCBs, and which will also emit large amounts of contaminated waste, really safe or efficient? No!

Although it is argued that the levels of PCBs to be incinerated are small, studies show that the lower the concentration of PCBs being burned, the harder they are for an incinerator to destroy.

## Can we get rid of PCBs without incinerating them?

Yes! Several technologies exist which can destroy PCBs more safely and with greater overall efficiency than incineration. Some of these non-incineration technologies are currently being demonstrated for the destruction of chemical warfare agents and munitions. Others are being used in the U.S. and other countries for disposal of industrial wastes, and could be adapted for chemical weapons disposal.

## What you can do with this information:

- 1) Tell the EPA and your elected officials that based on what we know about the effects of PCBs on human health, it is not acceptable to burn PCBs.
- 2) Advocate the use of advanced non-incineration technologies for disposal of the chemical weapons stockpile -- including materials containing PCBs and other toxic chemicals.

### Where to go for more information on PCBs:

- |  |                |  |
|--|----------------|--|
| * Center for Health, Environment and Justice | (703) 237-2249 | <a href="http://www.essential.org/cchw">www.essential.org/cchw</a> |
| * International POPs Elimination Network     | (202) 898-0150 | <a href="http://www.ipen.org">www.ipen.org</a>                     |
| * Environmental Research Foundation          | (410) 263-1585 | <a href="http://www.rachel.org">www.rachel.org</a>                 |

For fact sheet sources, and for information on safe chemical weapons disposal, contact the Chemical Weapons Working Group at (606) 986-0868 or visit our web site at [www.cwwg.org](http://www.cwwg.org).

# Non-Stockpile News

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The Non-Stockpile Chemical Weapons Citizens Coalition (Non-Stockpile Coalition) is a national grassroots network of citizens and organizations concerned with the recovery, storage and disposal of "non-stockpile chemical materiel" in the U.S. and elsewhere. Non-stockpile chemical materiel includes old and abandoned chemical weapons, chemical agent test kits, chemical weapons production buildings and other miscellaneous items which are not part of the chemical weapons stockpile. These items are known or suspected to exist in more than 35 U.S. states.

The Non-Stockpile Coalition seeks to promote environmental justice at all stages of the handling of non-stockpile materiel, and the involvement of citizens affected by these weapons and other items. We were officially organized in 1998, and currently have over 40 member and affiliate groups. Following are a few updates of our activities. For more information please contact Elizabeth Crowe at (606) 986-0868, or by email at kefcrowe@acs.eku.edu.

## ● Technology Update

▶ Two transportable technologies for non-stockpile chemical weapons are scheduled to begin testing this year: 1. NSCMP plans on starting operations of the Rapid Response System (RRS), designed to treat chemical agent identification sets, in May 2000--RRS operations have been significantly delayed, reportedly because the Utah Department of Environmental Quality and the Department of Health and Human Services have imposed additional process requirements on the system; and 2. The Munitions Management Device - 1 (MMD-1), designed to treat small unexplosive non-stockpile munitions, is scheduled to begin testing this summer.

▶ Another non-incineration system called the Explosive Destruction System (EDS) has been moving through tests in the United Kingdom. The EDS is a portable "closed" system designed to detonate and neutralize small explosive chemically-configured munitions. If proven safe, the EDS could be used as an alternative to open detonation/open burning of explosive chemical munitions and other "unexploded ordnance." The system "successfully" destroyed a phosgene agent explosive round in March 2000.

▶ At Aberdeen Proving Ground, Maryland, design work is 60% complete on a fixed facility called the Munition Assessment and Processing System, or MAPS. Because so many buried non-stockpile chemical munitions still exist at Aberdeen -- meaning that remediation of the weapons may continue for decades -- local community members agreed with the Army that such a facility would be the safest solution to non-stockpile weapons disposal at that site. Construction on the facility is expected to begin in 2001.

Currently, NSCMP plans to burn secondary wastes from these technologies in commercial hazardous waste incinerators, possibly in Utah and Texas. The Non-Stockpile Coalition, including our member and affiliate groups in Utah and Texas, are opposed to this unnecessary burning when advanced, non-incineration technologies may soon be available.

## ● "Citizens Alternative" for non-stockpile materiel disposal

In October 1999, NSCMP released its draft Programmatic Environmental Impact Statement (EIS) for disposal of non-stockpile chemical materiel. The purpose of an EIS is to assess the environmental and health effects of various clean-up options. In the non-stockpile draft EIS, the only options considered were 1) move forward with testing and deployment of the Rapid Response System, Munitions Management Device - 1 and Explosive Destruction System (as listed above) and incinerate the secondary waste from these systems; and 2) take no action at this time.

Agencies preparing an EIS are required to seek comments on their draft document. The Non-Stockpile Coalition comments included an alternative proposal, as follows. For a full copy of the coalition's comments to the draft EIS, call (606) 986-0868 or visit the web site at [www.cwwg.org](http://www.cwwg.org)

### Citizens Alternative

1. Move forward with testing of the transportable disposal systems (the Rapid Response System (RRS), Emergency Destruction System (EDS), and Munitions Management Device - 1 (MMD-1)) provided that residual wastes from these systems are treated with a non-incineration, publicly acceptable technology. If such a technology is not currently available, store residual wastes until such a technology is available.

2. At the same time you test the transportable systems, continue to identify and assess the capability of other non-incineration technologies to treat non-stockpile materiel. Compare the transportable systems to these other technologies. Consider using systems which generate a lesser amount of waste.

3. Complete design work of "second generation" MMD and EDS systems, then compare these systems to other non-incineration technologies.

4. Ensure that communities affected by non-stockpile chemical materiel -- including those slated to process residual wastes -- are informed and involved in making decisions regarding weapons disposal.

5. To the extent you reject this alternative approach, we support the alternative set out in Section 3.3.1.1. of the PEIS ("Use of transportable treatment systems with the condition of storing neutralent and other wastes that require thermal treatment.").

## ● National “Core Group” activities

As you may recall, beginning in July 1997 citizens have been engaged in dialogue with officials with the Army’s Non-Stockpile Chemical Materiel Program (NSCMP). We have used these meetings to discuss the Army’s plans for non-stockpile weapons disposal, and to help identify ways in which citizens and the Army can work cooperatively toward our common goals.

This past summer, the Keystone Center, a non-profit mediation group, was contracted by NSCMP to facilitate these dialogues. The re-formed dialogue group, officially called the “Core Group,” now consists of representatives from the NSCMP, citizen-based community groups, Army Corps of Engineers, regional and federal Environmental Protection Agency offices, state environmental regulatory agencies and base installation commanders. Citizen representatives to the Core Group are Janet Daniels (Alaska), Doris Bradshaw (Tennessee), Jane Williams (California) and professional engineer Patrick Lynch (California), and Elizabeth Crowe.

Core Group meetings in December 1999 and March 2000 focused primarily on finalizing group protocols and establishing better communication between citizens and NSCMP including its Project Manager LTC Chris Ross (who came on board in Summer 1999) and new deputy manager Bill Brankowitz. Frustrations of citizen Core Group members regarding the slowed -- or seemingly halted -- flow of information on important technology and permitting issues resulted in a new “Information Exchange” process, which will be on trial run between now and our next meeting in Fall 2000.

For more information on the Core Group contact Elizabeth Crowe by phone or email (listed above), Janesse Brewer with the Keystone Center at (970) 513-5847, or Louise Dyson with NSCMP at (410) 436-3445.

*the end*

## *Environmental Justice Happenings*

The CWWG’s efforts around environmental justice have grown in the last six months. Pine Bluff for Safe Disposal’s Evelyn Yates, from Pine Bluff, Arkansas, has been particularly busy bringing the message of “safe disposal of chemical weapons” to regional and national environmental justice fora (thanks, Evelyn!). A list of recent activities follows.

- In December 1999, KEF staff member Elizabeth Crowe attended the National Environmental Justice Advisory Council (NEJAC) meeting in Virginia to raise the chemical weapons issue to this national group, which gives input to the U.S. Environmental Protection Agency on environmental justice policy issues. A draft resolution on chemical weapons disposal was circulated at the December meeting and will also be presented at the May 2000 NEJAC meeting in Atlanta, Georgia.
- Later in December 1999, Evelyn participated in a National Emergency Gathering of Black Community Advocates for Environmental and Economic Justice in New Orleans, Louisiana. Hundreds of African-American environmental justice leaders from across the country declared a “state of emergency” on environmental racism and economic injustice and developed an Interim National Black Environmental and Economic Justice Coordinating Committee (INBEEJCC). The INBEEJCC Action Plan includes development of youth mentorship and leadership programs, participation in national and international policy-making conferences, an demobilizing community groups to respond to EJ priorities locally and nationally.
- In January, in observance of Martin Luther King Jr.’s birthday, the INBEEJCC sponsored a press conference and community briefing on environmental injustice in Washington, DC. The press conference included the release of a position paper entitled “National State of Emergency on Environmental Racism and Economic Injustice,” and display of a quilt, which memorialized those who have died as a result of exposure to toxic chemicals.
- This past March, the People of Color and Disenfranchised Communities Network sponsored a trip to Washington DC of community environmental justice leaders from Memphis, Tennessee, Pine Bluff, Arkansas and Savannah, Georgia. The trip emphasized the effects of toxic exposures from federal facilities on African-American youth -- and itself involved 15 young people from Tennessee and Arkansas.

For more information on these organizations or to find out more about environmental justice and the chemical weapons disposal program, contact Elizabeth Crowe at 606-986-0868 or Evelyn Yates at 870-536-0836.

# Site Updates:

## Colorado

### *CAC votes down incineration*

**PMCD leadership  
... might want to  
consider honesty  
and integrity  
in the future.**

--Ross Vincent

In October 1999 the Colorado Citizens Advisory Commission (CAC) voted 4-3 to proceed with one of the technologies recently demonstrated by the Assembled Chemical Weapons Assessment (ACWA) program rather than implementing incineration at the Pueblo Army Depot. Over several months the Army's Office of the Program Manager for Chemical Demilitarization (PMCD) had been putting pressure on local officials to lobby Congress to force a decision moving forward with disposal, hoping their rhetoric on the "maturity" of burning would win the day.

However, as in previous public meetings, almost every citizen who commented at the October meeting spoke against incineration and in favor of the safer alternatives. The CAC agreed with the citizens. The CAC, a governor-appointed citizens' group addressing local chemical weapons disposal issues, does not have the power to decide which technology will be used, but does make recommendations to the Army and legislators.

Colorado CAC member, Ross Vincent, who is also a CWWG member and Chair of the Sangre de Cristo Group of the Sierra Club, said, "I hope the CAC's commitment to advanced technologies here in Pueblo will send a clear message to PMCD leadership. Their relentless, decade-long, multi-million-dollar, taxpayer-funded, disingenuous spin campaign hasn't worked. They might want to consider honesty and integrity in the future."

Unfortunately, PMCD officials responded to the CAC vote with a revised incineration proposal for Colorado, accompanied by lobbyists who renewed efforts to pressure local city and county officials to support it. The Army's misleading message -- that incineration will be faster than non-incineration technologies -- is directed to local business people, eager to develop the Pueblo Army Depot property once the chemical weapons are gone. However, the Army's failed incineration program is more than a decade behind schedule and since its "new and improved" incinerator proposal has never been tried or tested there is no guarantee it can destroy chemical weapons any quicker than the Army's flawed incinerator operating in Utah.

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## Kentucky

### *State Legislature passes chem weapons bill*

On April 26, 2000 Kentucky Governor Paul Patton signed House Bill 579, a modification of an existing Kentucky Statute which has prevented the Army from moving forward with its plans to dispose of the chemical weapons stored at the Blue Grass Army Depot. Affected citizens have long objected to incineration of the munitions and to the Army's approach of limiting the community options to either incineration or doing nothing. The 1990 Statute was a result of citizen objections to their limited choices.

HB 579 opens up the possibility of deploying one of the advanced technologies that have been demonstrated viable for chem weapons disposal through the federally funded Assembled Chemical Weapons Assessment (ACWA) program. It allows Kentuckians to choose the safest and most protective of several destruction methods.

The bill also separates the storage aspect of the depot's chemical activity from the disposal phase. The way the 1990 Statute was written, storage and disposal were talked about as one and

the same.

Representative Harry Moberly sponsored HB 579 which passed both the House and Senate unanimously. The bill's language was the work of representatives from a diverse group of interests, including KEF, the Army, the State Environmental Cabinet, the State Emergency Response folks, the Citizens' Advisory Commission (CAC) and other citizen groups. It was a collective effort over a time span of a year which reached agreement on all points within the bill through a consensus process modelled after the ACWA Dialogue.

Doug Hindman, co-chair of the Kentucky CAC commented concerning the bill, "HB 579 was true consensus legislation. With agreement among stakeholders, the bill breezed through the legislature without opposition. The new law makes it possible to build a chemical demilitarization plant in Kentucky while maintaining strong safeguards over the process."

## Indiana

### *Groundbreaking for Neutralization Facility held April 8*

by Sara Morgan

*Charlotte and I decided that we had done a pretty good job of spitting and maybe we were a part of getting the direction of the wind changed... So, thanks to everyone in CWWG for all you have done for us.*

The ground breaking for the VX neutralization facility was this past Saturday, April 8. Rainer Zangerl, also of CAIN, (Citizens Against Incineration) was one of the shovelers. He was standing right next to Senator Lugar and was introduced as representing CAIN. I had one TV and one radio interview in which I acknowledged what had taken place in our campaign for safe disposal and publicly thanked people important to our victory.

There was quite a crowd for the ceremony. It was cold and windy so we were only outside for

the shoveling and went inside a new temporary building for the speeches. Indiana's head of Emergency Management and the CAC co-chair pointed out in his speech that we had not wanted incineration and that those that had fought it included the past governor.

It was lovely to be there. Charlotte Russell went with me to the ground breaking and she reminded me how a man back here at home with strong ties to Congress had come to a CAIN meeting and told us that we should break with CWWG because it would do us more harm than good. Also that anything that was going to happen would happen in Washington. He also added that we were just "spittin' in the wind"--referring to our activities.

Well, Charlotte and I decided we had done a pretty good job of spitting and maybe we were a part of getting the direction of the wind changed, along with a wonderful group of people from all over the country. So thanks to everyone in CWWG for all you have done for us.

## Alabama

### *PCBs in Anniston a "public health hazard"--ATSDR*

by Brenda Lindell

A recent federal government report has found sufficient levels of PCBs in parts of Anniston, Alabama to present a public health hazard. The report was put out by the Agency for Toxic Substances and Disease Registry (ATSDR). Nowhere else in the United States mirrors the PCBs situation in Anniston.

PCBs (polychlorinated biphenyls) were produced at Anniston's Monsanto plant for nearly 50 years before production was discontinued in 1971. PCBs production was banned in the United States in 1979. According to the U.S. Environmental Protection Agency (EPA), experiments with laboratory animals have shown that PCBs produce adverse health effects including liver damage, skin irritations, reproductive and developmental effects and cancer.

The ATSDR report stated that findings of PCBs "in residential soil in Anniston present a public health hazard of cancerous and noncancerous health effects for persons with prolonged exposure." Regarding soil analysis, the ATSDR report said, "PCBs in residential soils in some areas may present a public health hazard for thyroid and neurodevelopmental effects after exposure durations of less than one year." Regarding the analysis of blood data, the report stated, "The fact that young children have elevated levels of PCBs indicates that exposure may still be occurring at high

levels."

Relocation of some people has occurred. Clean-up will be long-term. At this point no one knows how far the contamination has spread. Some children born after 1995 have been found to have high PCBs levels in their blood.

Alabama Governor Don Siegelman has recently sent a letter to EPA Administrator Carol Browner requesting that a public meeting be held in Anniston concerning the national permit the EPA is preparing to issue for the burning of PCBs in all the Army's chemical weapons incinerators in the U.S. This national approval from EPA would include the chemical weapons incinerator being built in Anniston.

A blanket public meeting to cover all sites was held in Utah April 11, but the EPA has planned no meeting in Anniston for public input before the permit is issued. Governor Siegelman further requested this meeting be held before the public comment period ends on May 12.

The EPA has stated that a public meeting will be held at each incinerator site before any PCBs are actually burned there. However, the EPA permit to burn will have been issued before those meetings are held.

# Arkansas

## *Top Ten Disturbing Disclosures*

### *from the September 1999 Arkansas Contested Case Permit Hearing*

The following disclosures were extracted from the official record of the three-week contested case permit hearing held before a Hearing Officer of the Arkansas Department of Environmental Quality in September 1999. As yet, no decision has been made on this citizens' challenge to the permit for the Army's chemical weapons incinerator being constructed at the Pine Bluff Arsenal.

1. Before the risk factors for the Pine Bluff chemical weapons incinerator's Health Risk Assessment were calculated, the State Department of Environmental Quality (DEQ) had already decided that the numbers would not prevent the construction of the chemical weapons incinerator at the Pine Bluff Arsenal.
  2. Although infants were identified as one of the most sensitive members of the population affected by the emissions of the proposed incinerator, the Arkansas Department of Health did not determine what a safe dose of dioxin might be for an infant before submitting infant risk estimates and analysis on the acceptability of that risk.
  3. State regulators who issued the incinerator permit did not know if DEQ employees, in their preparation of the permit, had taken adequate steps to ensure the protection of breast-feeding infants from the incinerator's dioxin emissions.
  4. DEQ failed to adequately address the risks associated with mercury exposures. In the face of an unfavorable risk determination for mercury emissions, DEQ abandoned the U.S. Environmental Protection Agency's mercury standard in favor of a less protective standard followed by the Federal Drug Administration.
  5. DEQ decision makers do not know if the chemical warfare agent monitors the Army plans to use will detect the presence of chemical warfare agents in a timely and accurate fashion.
  6. Key DEQ decision makers involved in the issuance of the permit were unfamiliar with the numerous significant, systemic problems encountered at other Army chemical warfare agent incineration facilities such as: agent releases; worker exposures; agent monitor alarms; agent migration; agent spills, power outages; agent residue (heels) hardened in munitions.
  7. Key DEQ decision makers are unfamiliar with the specific contents and conditions of the munitions at the Arsenal.
  8. The synergistic impacts of the chemicals expected to be emitted from the Pine Bluff incinerator have not been assessed.
  9. DEQ decision makers are ignorant of how the significant amount of hazardous waste that will be produced during the operation of the incineration facility will be treated.
  10. Persons responsible for approving the permit for the Pine Bluff facility do not know what types or quantities of chemicals will be emitted from the stack during trial burns and agent operations.
- 

# The Pacific

## *Incinerator entering "Closure" Phase*

The Army's Pacific chemical weapons incinerator, located on Kalama Island (Johnston Atoll) may soon be entering its "closure" phase. The Army and contractor Raytheon have operated the facility since 1989, and in 1998 were awarded another 10-year permit by the U.S. Environmental Protection Agency (EPA) to complete disposal of chemical weapons and other related activities on the Island.

The Army still has a lot of work to do before submitting a final Closure Plan to the Region 9 EPA, including completing a human health and ecological risk assessment; determining which analytical methods to use to check for contamination in waste by-products; and getting approval from EPA on a carbon filter system, which has not yet proven to be effective. Meanwhile, the incineration of chemical weapons continues and troubling events also continue.

- On January 15, 2000 a chemical agent monitor in a trailer -- used by international chemical weapons treaty inspectors -- read positive for nerve agent VX contamination. The Army's best guess as to the source of the contamination is that a component of the chemical agent monitor was accidentally replaced with a contaminated part.
- On February 14, 2000 chemical agent monitors on the perimeter of the incinerator read a small amount of VX nerve agent. However, due to worker error in a further analytical process, the Army says the chemical agent reading was inconclusive.
- On April 4, 2000 two plant employees, after working with materials that read extremely high for VX contamination, exited the contaminated area, removed their protective clothing and, ignoring regulations, took the contaminated clothing to an unprotected room before the clothing was cleared.

# Oregon

## *Citizens argue to revoke incinerator permit; raise serious questions about worker exposure incident*

**It's the same  
people who can't  
identify this  
material that  
want us to believe  
they can safely  
burn chemical  
weapons while  
protecting our  
community--  
I don't think so.**

**--Karyn Jones  
(regarding  
September 15 worker  
exposure incident)**

At the Oregon Environmental Quality Commission (EQC) meeting in Portland November 1999, citizens groups presented oral comments in an effort to have the permit allowing the Army and Raytheon Demilitarization Corp. to construct and operate a chemical weapons incinerator revoked.

Before comments were made concerning a variety of permit issues, citizens sharply criticized the Army and Raytheon for their mishandling of the September 15, 1999 chemical incident which sent over 30 workers at the construction site to the hospital.

Karyn Jones, board member of G.A.S.P., a grassroots activist group in Oregon, pointed out that while the Army touts safety as being their number one priority they were completely unprepared for the September incident. Furthermore, after years of public relations trying to convince the community that they have the highest capability to detect and deal with toxic chemicals, the Army, after more than two months, has still not been able to identify what sickened the workers.

Jones said, "It's the same people who can't identify this material that want us to believe they can safely burn chemical weapons while protecting our community - - I don't think so." Jones asked, "How is it possible that these 'experts' can't identify a chemical inside a building on a construction site? It smells like a cover up!"

The Army and Raytheon handled the situation so

badly that health care providers were exposed at the local hospital while trying to treat those who had fallen ill. It was bungled to the point where sick workers were driving themselves to the hospital. Citizens groups believe the Army and Raytheon broke their own procedures in an attempt to cover-up the incident or at least minimize the public image fallout from having to notify people outside their own circle.

Comments were also provided to the EQC surrounding more than 400 pages of new evidence submitted to Oregon Circuit Court in December 1998. At that time Judge Marcus ruled that since it had not been considered by the EQC first, he would require them to review it before taking any action. Among the issues raised then and at Friday's meeting, were: the incompleteness of the original permit application; evidence there will be agent contaminated residual waste; new information from the Army and the National Research Council concerning higher toxicity of the agents than previously thought; the recently approved and recently demonstrated alternative technologies now available; and, the inadequacies of the public process being afforded citizens to make their case before the EQC.

Dr. Bob Palzer, Chair of the Sierra Club's national Air Committee spoke passionately to the EQC about the alternative technologies that are currently being deployed and others that have recently been demonstrated as effective. Dr. Palzer said, "I think it is equally relevant to point out just where this alternative treatment process is now being used for HD (mustard agents). This alternative technology is being used at the Edgewood portion of the Aberdeen Proving Grounds less than an hour drive from Washington, DC. The President, Congress, and the Pentagon are in fairly close proximity."

Palzer noted that 63% of the agents stored at Umatilla is identical to that stored at the Aberdeen, MD facility. "I cannot understand why the citizens of Hermiston, Irrigon, and others living close to the Umatilla site should not be able to share the benefits of this much safer and proven technology. Not only can you make this happen; you must make this happen," he said.

Richard Condit, one of the lawyers for the citizens, ended the comments with a series of pointed questions aimed at the process the EQC is using to consider the request for revocation. Under Oregon law, the EQC determines if those challenging the permit are granted a "contested case." Such a forum, if granted, allows petitioners to subpoena documents, call in experts and swear in witness. To date, repeated requests to the EQC by the citizens groups for such an opportunity have been denied.

"You have all the power," said Condit. "You ask us to prove that the issues we bring before you are as we claim, but you refuse to give us the tools we need to do so. We can't gather documents, swear in witnesses or bring forth experts. You have ignored the principles of due process arbitrarily. It is blatantly unfair to put the burden of proof on us and refuse to grant us a legitimate process within which to do just that."

## Utah

*More than 5,000 Utahns tell Governor Leavitt:*

# Stop nerve gas incineration!

*by Jason Groenewold*

More than 5,000 Utahns signed a Families Against Incinerator Risk (FAIR) petition urging Utah Governor Michael Leavitt to take leadership to stop the US Army from continuing to burn chemical weapons (CW) at the Tooele Chemical Weapons Demilitarization Facility (TOCDF). The petition forms, which were delivered to the Governor's office September 27, called for adoption of advanced technologies which are safer than incineration.

"The message to Governor Leavitt is clear," explained FAIR director Jason Groenewold. "Utah is downwind of the only nerve gas incinerator in the country, and other states are abandoning incineration because it does not work."

"The fact is that the Army's incineration program has failed and it cannot

perform as intended," said Chip Ward, vice-president of FAIR. "Burning nerve gas emits into the air harmful toxins that affect our nervous, reproductive and immune systems." Ward noted that the Army has abandoned two of the six furnace systems at the Utah plant and that they are now experimenting with burning nerve agent in a way that has never been tested. According to Ward, the original plans called for burning nerve agent, metal parts and explosives in separate furnaces. Due to the gelling of agent inside the munitions (where it was once liquid), the Army is now burning explosives and agent in the same furnace and they have never tested the emissions from these new operating conditions.

Governor Leavitt has Congressional authority to stop the burning of nerve gas if he feels the public health risks exceed

an acceptable level. FAIR and other citizen groups have cited numerous worker exposures, agent migrations, releases and spills and system failures at TOCDF which endanger the health and welfare of workers, the public and the environment. They want advanced non-smokestack technologies that do not emit harmful toxins into the air and have tested viable for CW destruction.

FAIR thanks all the volunteers who helped with gathering the petition signatures. Special thanks goes out to: Chad Nielson, Carrie Norton, Rob DeBirk, Sajah, Michele Stockton, Ryan Behunin, Mike Steeves, Sophie Windward, Diana Jorgenson, Wendy Lagerquist, Jason Plate, and Kyle Madsen. Also, thanks to Patagonia, Wild Oats and Park Ivy for displaying the petitions.

## Maryland

*Construction of alternative plant has started, but funding is slow*

Permits for the non-incineration chemical weapons destruction facility at the Aberdeen Proving Ground were granted without public opposition or hostility in February 1999. The contractor's administration building has been built and the footers have been poured for the disposal building. But, construction of the neutralization and bio-remediation facility is going at a snail's pace, according to Maryland CWWG member John Nunn. "We are looking at a delay of at least 10 months because the Army is putting money budgeted for chem demil into its incineration program where there has been a big schedule slippage," he said. Nunn commented further that, "When Gloria Patton (the Army's acting chemical demilitarization chief) comes to talk to the CAC (Citizens Advisory Commission) in June we plan to ask her, 'Where's the money?' We are anxious to get the disposal process started."

## Take Action for the Snake River!

Taxpayers for Common Sense (TCS) needs your help to save taxpayer money and save once-legendary Snake River salmon and steelhead from extinction. TCS has sponsored an endorsement drive for restoring the Snake River. This new tool shows the national scope of the issue and its appeal to a broad audience.

The listed endorsers, which include organizations, businesses, scientists, fishermen and prominent individuals, advocate a variety of policies, but all agree on the need for partial removal of the four Lower Snake River dams.

**TO VIEW THE LIST OR SIGN ON IN SUPPORT** visit <[www.taxpayer.net/snake](http://www.taxpayer.net/snake)> or contact Kathleen McNeilly at TCS: [kathleen@taxpayer.net](mailto:kathleen@taxpayer.net) 1-800-TAXPAYER ext.128.

*Army lied about funding:*

## **Pentagon locates money for testing remaining three ACWA-identified technologies**

On July 27, 1999, a year to the day from when contracts were awarded to test only three alternatives to the Army's incineration technology for chemical weapons disposal, the Pentagon announced it would direct the Army to test the remaining three non-incineration technologies.

In July 1998 the Army's top official in the chemical weapons disposal program, Deputy Assistant Secretary of the Army, Ted Procriv, claimed funds were not available to demonstrate all six alternative technologies that had been identified by the Congressionally-mandated Assembled Chemical Weapons Assessment (ACWA)

program. \$25 million was needed in 1998 to ensure demonstration of all six technologies. Procriv's position, which he maintained in briefings to Congress and in statements to the public and the press, forced the elimination of three technologies from the testing process. "The money's just not there," Procriv stated repeatedly.

However, a Pentagon Comptroller's July report painted a very different picture. According to the report, "Information provided by the Department of the Army and the Defense Finance and Accounting Service indicated that as of February 1999, approximately \$1 billion of current and prior

years funds were unexpended." The report also states, "The Department has agreed to conduct evaluations of the three additional alternative technologies. This will require an additional \$40 Million..."

The cost of doing three additional demonstrations has gone up from \$25 million it would have cost if they had been done a year ago to \$40 million. The increase is due to the fact that test sites used for the previous demonstrations have to be geared back up, support personnel re-assigned, and environmental documents re-done. Taxpayers are paying a \$15 million penalty for Procriv's obsession with incineration.

## **Senators Call for GAO Investigation**

Responding to CWWG's documented accusations of gross mismanagement in the Army's Chemical Stockpile Disposal Program, Senate Appropriators on July 14 called for a General Accounting Office (GAO) investigation of this program's safety, management, oversight and fiscal accountability.

In their letter to the Comptroller General of the GAO, the two Senators, Mitch McConnell (R-KY), Senate Appropriations Foreign Operations Committee Chair and

Ted Stevens (R-AK), Senate Appropriations Defense Committee Chair, said, "We are concerned that the Department of Defense has failed to adequately implement the national strategy [and] to account for the funds appropriated by Congress..."

In 1985, the Army told Congress it would cost \$1.7 billion and take until 1994 to destroy the entire U.S. stockpile. The current price tag is between \$15 and \$16 billion with the Army hoping for completion by the timetable provided for in

the recently ratified Chemical Weapons Convention. The Convention deadline is April 2007 with a one-time five-year extension allowed, moving the deadline to April 2012.

The Senators' letter stated, "From 1993 to date, Congress has appropriated \$4.5 billion for costs associated with this national effort" and "...less than 10% of the stockpile has been destroyed and America's program is struggling to meet its schedule."

## **Misstatements impel CWWG to release documents**

At the February 17 meeting of the Utah Citizens' Advisory Commission (CAC), a governor-appointed citizens' group addressing disposal issues, Steve Jones, the incinerator's reinstated Safety Manager, told the audience that the Utah incinerator is "absolutely safe." He assured them that it's "almost impossible for anything to happen that is ever going to endanger these workers from agent, let alone anything that is going to happen to the local community..Incineration is an exact science...it's not mathematically possible [for low-level nerve agent to come out the stack]...We have the best instruments that science has to offer stuck on that stack."

These assertions from Jones were in complete contradiction to the 1500 pages of handwritten letters and official internal documents he allegedly sent to CWWG from August 1999 to mid-January 2000. (Refer to story on Page 1 for details.) Additionally, Jones' sweeping statements on plant safety to the CAC were refuted by two events that happened the week following the CAC meet-

ing. Three days later the Army reported that two workers had been exposed to the nerve agent GB when it leaked into a room where they were working. Then three days after that incident, 40 to 45 gallons of molten slag spilled from a drum and started a fire that burned the covering of the concrete floor and electrical equipment in a secondary room of the liquid incinerator.

It was Jones' misleading assertions in front of the CAC that forced CWWG's hand in releasing his documents. CWWG spokesperson Craig Williams stated, "The CWWG wants to ensure that the U.S. stockpile of weapons is disposed of in a way that offers maximum protection to workers, the public and the environment. We were dismayed and more than a little shocked that Jones made public statements completely contradicting the official documents and handwritten letters we claim he sent to us which detailed the ways in which incineration 'just doesn't work.' We felt we had to get the truth out. If anyone thinks our objective was targeting Steve, they are missing the point entirely."

# ACWA

## *(Assembled Chemical Weapons Assessment)*

Three non-incineration technologies will soon be demonstrated, under the ACWA program, to analyze their capability to safely destroy chemical weapons. The ACWA program was mandated by Congress in 1996 to identify and demonstrate at least two non-incineration technologies for disposal of "assembled" chemical weapons such as rockets, bombs, projectiles, etc. The three non-incineration technologies to begin demonstrations in June are:

- ▶ AEA Technology's "Silver II" electrochemical oxidation process;
- ▶ Eco Logic's gas phase chemical reduction with Foster Wheeler's supercritical water oxidation; and
- ▶ Teledyne Commodore's "Solvated Electron Technology" followed by chemical oxidation.

The ACWA program is different from most other military programs in that the criteria for viable treatment technologies was developed cooperatively by citizens, state and federal regulatory agencies, and the Department of Defense. A total of six non-incineration technologies met the strict criteria, making them eligible for moving to the demonstration phase. Due to an alleged funding shortage, however, only three of the six began demonstrations in 1998. Two of them -- General Atomics' supercritical water oxidation and Parsons/Honeywell hydrolysis and biological treatment -- were recommended by ACWA to be considered for chemical weapons disposal.

Under Congressional pressure, the Pentagon in July 1999 identified enough funding to demonstrate the remaining three technologies listed above. Demonstration testing is expected to continue through September 2000, with a final report to Congress in early 2001. Based on demonstration results, any or all of these technologies may be recommended by ACWA for chemical weapons disposal.

What makes these advanced technologies safer than incineration is their ability to capture all by-products and only release them after they have been identified and proven safe. In the incineration process the by-products, including extremely toxic chemicals and heavy metals, are emitted unchecked into the environment through the smokestack.

## ACWA

### *& the NEPA Process--*

The movement toward non-incineration chemical weapons disposal advanced on April 14, when the Assembled Chemical Weapons Assessment (ACWA) program announced its intention to analyze where to locate non-incineration chemical weapons disposal pilot plants.

This type of analysis, required by the National Environmental Policy Act (NEPA), is made in the form of an Environmental Impact Statement (EIS), a document which details the impacts a federal action -- in this case, operation of a non-incineration chemical weapons disposal test facility -- may have on public health and safety and the environment.

Any technology considered for chemical weapons disposal -- even incineration -- is subject to analysis under NEPA. However, the scope of this EIS is limited to the two disposal technologies that have already passed ACWA's demonstration phase.

Following NEPA guidance for public input regarding the content of the EIS, ACWA has conducted scoping meetings in Colorado, Arkansas, Alabama and Kentucky, possible sites for the pilot plants.

For more information on the ACWA EIS or the NEPA process, please contact the Chemical Weapons Working Group or visit the ACWA website at [www.pmacwa.org](http://www.pmacwa.org).

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**Army confirms GB  
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for details and next issue  
of "Common Sense" for  
complete story.