

**Subject: Re: Recent Bomblet**

Hi Sue,

I apologize for the delay in responding to your question. The RMA bomblet issues have required a lot of our time recently, and your question required a bit of research on my part. Here is what I have been able to find out. I am certainly not expert on this topic and I have cc'd others on this e-mail who can respond if they believe my answer is incorrect.

I understand that the Rocky Mountain Arsenal is part of the Nonstockpile Chemical Material Program (NSCMP). The NSCMP website lists the Arsenal and indicates there are 5 potential burial sites. ([www-pmcd.apge...il/text/NSCMP/IP/FS/RMA/index.html](http://www-pmcd.apge...il/text/NSCMP/IP/FS/RMA/index.html)). [Given that, I suppose the important question is: how does this impact the Arsenal remediation? According to what I have read, the NSCMP is responsible for buried chemical warfare material (CWM) only after it is excavated. The task of located buried CWM, deciding whether to excavate it, or how to remediate former burial locations rests with installation commander (if it is an active military facility) in coordination with those who are responsible for the applicable state, federal and local environmental laws or the US Army Corps of Engineers and regulatory agencies if it is a formerly used defense site. These activities are not part of the NSCMP and are the responsibility of other Department of Defense organizations that conduct the activities under the requirements of CERCLA or RCRA. The NSCMP provides advice and guidance.] *but not ~~to~~ programmatically -*

If suspect CWM is found, the US Army Technical Escort Unit personnel are responsible for determining whether it is CWM and to recover the item if it is. The NSCMP has assessment techniques (PINS, etc.) to determine the type of chemical fill in a recovered non-stockpile CWM item. A Munitions Assessment Review Board (a representative of NSCMP serves on the board) manages the identification process. The NSCMP is responsible for the safe storage, treatment and transport of CWM once it is recovered. As evidenced by your follow-on messages you are familiar with some of the treatment systems that NSCMP is developing for CWM.

Regarding your question about the RMA RAB and the NSCMP, my

recollection is that this topic was discussed in the later part of 1996, when the Non-stockpile Chemical Weapon Programmatic Environmental Impact Statement was available for public comment.

Thank you for the information about EDS. Representatives of CDPHE have talked with a variety of people about this system. While it seems particularly well-suited to the RMA bomblet situation, our understanding is that it isn't quite ready for full-scale application. We are very interested in following its development. As I mentioned to you on the telephone, I will try to get some additional information on this for you.

I hope this information is useful to you.