

Thanks for the reply to my question about the relation of RMA to the NSCMP program. I have "deconstructed" your part and put my reply after. I don't want to belabor this conversation, but I want to set the record straight from another perspective:

>>>BN: I understand that the Rocky Mountain Arsenal is part of the Nonstockpile Chemical Materiel Program (NSCMP). The NSCMP website lists the Arsenal and indicates there are 5 potential burial sites. (www-pmcd.opge...il/text/NSCMP/IP/FS/RMA/index.html).

>SM: The way I understand this situation is: the NSCMP has to be invited in to sites (this is case around the country). The EDS just can't be brought in, RMA needs to invite the NSCMP and their expertise-there is no jurisdiction here on the part of the NSCMP, The Tech Escort people are chem demil for sure, but not necessarily under the NSCMP program. Herein lies a very awkward situation.

Having info in the _Survey and Analysis Report_ (which the NSCMP's Webpg is built from) does not make RMA a part of the innovative technologies component of the NSCMP NOR does it allow NSCMP free access to RMA when there is a find of nscm. From a PROGRAMMATIC POINT OF VIEW, RMA is NOT a part of the NSCMP, until RMA determines it wants to be (that is, when RMA folks determine they want NSCMP involved in disposal and destruction). NSCMP only deals with things that are found and come "above ground."

>>>BN: 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.

>SM: Yes, that is the question! And the NSCMP does become involved when asked. But in my mind there still exists an uneasy relationship programmatically between RMA (Superfund) and NSCMP...

>>>BN: 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.

>SM: Not necessarily-it is up to the Arsenal to ask for guidance from the NSCMP. The NSCMP CANNOT walk into a situation and deal with it. They have to be asked! And the Tech Escort people are not necessarily from the NSCMP.

>>>BN: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.

>SM: I think I had already resigned from the RAB, but I would be interested in the State's/EPA/Army's comments on this, and how it was determined that RMA was not programmatically part of NSCMP. The final EIS has not been issued though.

>>>BN: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.

>SM: You are welcome and thanks. I hope the Sarin tests now being conducted in England on the EDS are positive so we may move to some closure here. sm