

## DEPARTMENT OF DEFENSE COMMENTS

The Department of Defense (DOD) has received a copy of the Centers for Disease Control (CDC) report titled "*Review of the U.S. Army Proposal for Off-Site Treatment and Disposal of Caustic VX from the Newport Chemical Agent Disposal Facility*" dated March 2005. The DOD appreciates the opportunity to review and comment upon the report.

We believe that there is a typographical error on the cover and that the report should be titled, "*Review of the U.S. Army Proposal for Off-Site Treatment and Disposal of Caustic VX **Hydrolysate** from the Newport Chemical Agent Disposal Facility.*"

Like the CDC, we believe that safety of the workers, public, and environment is paramount and must be addressed. DOD agrees with a number of the CDC findings and recommendations that support the start of agent destruction operations at Newport and subsequent transport to a commercial treatment, storage, and disposal facility (TSDF). These include:

- 1) Destruction of the DIC-stabilized agent can proceed forward at an 8% percent loading.
- 2) The potential hazard of the caustic hydrolysate is predominantly associated with its corrosive and caustic properties and not nerve agent effects.
- 3) The corrosive and caustic hazards of the hydrolysate do not preclude handling or transportation and the precautions in the transportation plan meet the Department of Transportation regulations to safely protect the public, personnel, and environment.
- 4) The DuPont Secure Environmental Treatment process is capable of treating the major components in the caustic hydrolysate wastewater.

The DOD recently completed tests on the VX drawn from the stockpile stored at Newport. These tests confirm that the same criteria used to clear 8 % DIC-stabilized VX were met for the entire stockpile and that the issues associated with the DCC stabilized agent or the blended DIC/DCC stabilized agent have been addressed. Additionally, the total quantity of the stockpile that is stabilized with DIC is 60%. The detailed results from these tests are being furnished to CDC to update previously submitted data and address the concerns they have identified in their report.

Early last month the DOD provided a copy of DuPont's phosphonate removal technology report to the CDC for review. The concerns raised by the EPA regarding the contribution of treated caustic hydrolysate to the ecological risk to

the Delaware River are noted, and the DOD will work with the CDC and EPA to address these concerns.

Based on the results of the treatability studies, the DOD is convinced that the pretreatment process developed by DuPont will address potential data gaps raised by the EPA in its findings and address concerns raised over the past year by members of the public.

The DOD appreciates the professionalism and thoroughness of the CDC in completing this study and look forward to working with the CDC scientists to address their concerns.