

**Comments on
Draft
Engineering Evaluation/Cost Analysis
Disposal of Discarded Military Munitions (DMM), including Recovered Chemical
Warfare Materiel (RCWM), Conventional DMM, and Material Document as an
Explosive Hazard (MDEH)
Spring Valley Formerly Used Defense Site
Washington, D.C.**

**Prepared on behalf of the
Spring Valley Restoration Advisory Board
By
Environmental Stewardship Concepts**

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Document Summary

The Engineering Evaluation/Cost Analysis (EE/CA) is separated into two sections that outline (1) Alternatives for disposing of recovered chemical warfare materiel (RCWM) and (2) Alternatives for disposing of DMM/MDEH. The disposal will be implemented under a removal action, rather than a remedial action, which means that it will take place within the course of the cleanup instead of at the end. This decision is based on the nature of the discarded military munitions, which pose a threat to public health, and their proximity to residences, Sibley Hospital, and a public drinking water supply. The removal action is anticipated to last only 1 month after it begins.

The alternatives laid out for the recovered chemical warfare materiel and DMM/MDEH fall into the same four categories:

- (1) Alternative A – No further action
- (2) Alternative B – Open Detonation
- (3) Alternative C – On-Site Demilitarization – Explosive Destruction System
- (4) Alternative D – Off-Site Demilitarization at another military installation

EE/CA recommends on-site destruction, Alternative C, for the RCWM and the DMM/MDEH. According to the EE/CA, Alternative C for RCWM (using the On-Site Explosive Destruction System) has the lowest probability of an accident that could impact the public because the RCWM will not be transported off-site. The least expensive option for disposing of RCWM is Alternative B, the open detonation, which is estimated at \$200K. Alternative C ranks as the 2nd least expensive alternative at \$650,000 versus off-site demolition (\$900K) and the no action alternative (\$750K per year in perpetuity). In the case of DMM/MDEH, the Army recommends the on-site demilitarization because of the added protection of the public that comes with not having to transport the DMM/MDEH off-site.

General Comments

Our review of the *Spring Valley Engineering Evaluation/Cost Analysis* for the DMM including RCWM, conventional DMM, and material documented as an explosive hazard (MDEH) indicates that the document is well done and accurate. Our comments have not substantively changed since our first review of the document in the fall of 2009.

The EE/CA provides two excellent tables (9-1 and 12-1) that give comparisons of the four alternatives for each type of DMM. One point to note is that the text lists the tables as 9-1 and 12-1 but in their respective titles, they are referred to as 9.1 and 12.1. For consistency, the EE/CA could be changed to reflect a uniform labeling scheme.

The EE/CA does a good job of explaining the Applicable and Relevant or Appropriate Requirements (ARARs) in terms of which laws apply and how they specifically apply to the Spring Valley site.

ESC agrees that transporting the RCWM presents infinitely more risks than transporting the Explosive Destruction System to federal property for on-site demolition. Additionally, previous discussion amongst the Spring Valley Partners had indicated that the DMM could be transported to southeast DC for demolition, which would create an environmental justice issue. Residents of Southeast DC, Ward 8 specifically, are predominantly black and low-income compared to the northwest Ward 3 where Spring Valley is located. Data from a 2003 ESRI Business Information Solutions for D.C report indicate that the median income for Ward 8 was one-third that of Ward 3. Census data from 2000 also indicates that the population of Ward 8 is comprised of 93 percent black, non-Hispanic and 5% white, non-Hispanic, while Ward 3 is nearly the reverse with six percent black, non-Hispanic and 84% white, non-Hispanic. Unemployment numbers from November 2009 indicate that 28.3% of the population in Ward 8 was unemployed, compared to 3.2% in Ward 3, according to the *Washington Business Journal*. Sending hazardous munitions from Spring Valley to the southeast portion of DC when there are better options available for disposal would create a situation of "Not In My Backyard." ESC concurs with the Army's selection of Alternative C as the alternative that best meets the evaluation criteria of effectiveness, implementability, and cost for disposing of both RCWM and DMM/MDEH.