Argonne NATIONAL LABORATORY

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Lessons Learned from an Installation Perspective for Chemical Demilitarization Plant Start-up at Four Operating Incineration Sites

Decision and Information Sciences Division

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L. Motz
Decision and Information Sciences Division, Argonne National Laboratory

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by

L. Motz

Abstract

This study presents the lessons learned by chemical storage installations as they prepared for the start of chemical demilitarization plant operations at the four current chemical incinerator sites in Alabama, Arkansas, Oregon, and Utah. The study included interviews with persons associated with the process and collection of available documents prepared at each site. The goal was to provide useful information for the chemical weapons storage sites in Colorado and Kentucky that will be going through plant start-up in the next few years. The study is not a compendium of what to do and what not to do. The information has been categorized into ten lessons learned; each is discussed individually. Documents that may useful to the Colorado and Kentucky sites are included in the appendices. This study should be used as a basis for planning and training.

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1 Introduction

Currently, four active chemical munitions demilitarization (demil) plants are operating in the United States. They are located at Deseret Chemical Depot (DCD),[1] Utah; Anniston Army Depot (ANAD), Alabama; Pine Bluff Arsenal (PBA), Arkansas; and Umatilla Chemical Depot (UMCD), Oregon. The U.S. Army (Army) Chemical Materials Agency (CMA) owns and operates DCD and UMCD, the two chemical depots. There are tenant activities under CMA to manage the storage operations at ANAD and PBA. The tenant activities are Anniston Chemical Activity (ANCA) at ANAD and Pine Bluff Chemical Activity (PBCA) at PBA.

Chemical weapons are also stored at Pueblo Chemical Depot (PCD), Colorado, and Bluegrass Army Depot (BGAD), Kentucky. The chemical munitions at BGAD are managed by Bluegrass Chemical Activity (BGCA). Construction of chemical demil plants at these remaining two sites is under way. By the time demil operations begin at BGCA and PCD, demil operations at the four currently operating incineration plants will be finished. CMA commissioned this study for the benefit of the two sites where demil plant start-up has not yet begun.

1.1 Purpose

The process of starting up a chemical demil plant is not simple. It is a complex tapestry of separate issues involving the demil plant, the Army installation and/or chemical activity, and the surrounding community. These separate stakeholder issues must be resolved simultaneously to successfully start up plant operations.

The plant's main focus is ensuring operational readiness (i.e., equipment and procedures); it must also build public confidence in its ability to function properly and safely. The chemical storage installation/activity must continue its existing missions of safe storage of the chemical munitions and provision of maximum protection to the installation workforce and surrounding community through the Chemical Stockpile Emergency Preparedness Program (CSEPP). The installation or activity must also prepare to shift to a new primary mission, that of supporting the chemical demil plant with a steady flow of chemical munitions to be destroyed. The community stakeholders, whether local emergency management agencies (EMAs) and responders, citizen groups, or public officials, must be confident that both the installation and the plant can function safely and respond to any unforeseen event. These concerns will intensify as the plant prepares to start up.

The purpose of this study is to look at the issues from the chemical storage installation perspective to determine the key lessons learned when the four currently operating incineration sites went through the start-up process. This study will provide a legacy document for use by the two sites with plants still under construction as they prepare to go through the same start-up process. Although the weapons-destruction process under the Assembled Chemical Weapons Alternative (ACWA) program will be vastly different from the incineration process currently in

[1] Appendix A provides a list of acronyms, abbreviations, and definitions.

use, the core issues of preparing for demil start-up will be essentially the same; differences are noted in this study.

1.2 Description of the Study

The collection of data for this study began in June 2009 and ended in May 2010. The primary method of data collection was direct interviews with individuals who were either involved first hand with the start-up issues or who were closely related to those issues. Where available, documentation that was created during or evolved from the start-up process was gathered to support the lessons learned. The amount of information available varied greatly from site to site, depending on when the plant began operation, who was available for an interview, what the interviewee remembered of the process, and what documentation was available.

The first plant start-up studied was ANCA. It was selected for three reasons. First, study personnel were at ANCA during the entire start-up process and had a working familiarity with many of the issues presented. Second, a majority of personnel directly involved with the process were still employed by ANCA, had retained some documentation, and remembered with some detail the process used to resolve start-up issues. ANCA also prepared an informative Memorandum for Record of its demil plant start-up lessons learned in April 2004. The memorandum was used as a key reference to develop this study and was distributed to all installations. It is provided as Appendix B.[2]

Finally, ANAC offered ease of follow-up over a 6-month period, which made it possible to design an outline of lessons learned to use during interviews at the other three sites. This initial outline, included as Appendix C, was provided to each of the other three sites prior to conducting on-site interviews to assist them in gathering information and recollecting the start-up process. This process was crucial because the interviews at PBCA, UMCD, and DCD were limited to a 2- or 3-day period.

PBCA and UMCD began demil plant operations at approximately the same time as ANCA, which made it relatively straightforward to locate interviewees because many key individuals were still employed at the sites. On the other hand, it was difficult to gather information at DCD because operations began much earlier (i.e., in August 1996). Many of the personnel at DCD during start-up have retired, died, or forgotten much of the process. Some retirees that remained in the area agreed to be interviewed, which helped in creating a better understanding of DCD's start-up process. It is unfortunate that more information is not available from DCD because activities there laid the groundwork for much of the plant start-up process at PBCA, ANCA, and UMCD.

[2] Reading the memorandum of Appendix B before proceeding to Section 2 of this study provides a useful overview.

1.3 Scope and Organization of the Study

The intent of this study is to produce a useful guide for PCD and BGCA in their planning processes. It is not intended to be a complete compendium or checklist. Not only would such a document be too lengthy, but also no single plan or solution applies to all sites. Each site is unique, so it is likely that both PCD and BGCA will have unique issues not addressed at the other four sites.

This study is divided into three sections, the first of which is this introduction. The main section of the report, Section 2, discusses the 10 most important plant start-up lessons learned. These lessons learned are discussed from the installation point of view. No two installations had all of the same issues nor were issues resolved in like manner at all four installations. Section 3 summarizes the lessons learned and draws some conclusions. This section also suggests possible ways this study can be used to aid PCD and BGCA as they go through the start-up process.

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2 Lessons Learned

2.1 Lesson 1: Develop a New Mindset

"Develop a new mindset" sounds simple, but what does this recommendation have to do with demil plant start-up? The expression sounds subjective, and it is meant to be so. It is not found anywhere on the Lessons Learned Outline in Appendix C. It became obvious toward the end of this study that developing a new mindset is the key to a successful start-up path, yet it is perhaps one of the most difficult accomplishments for the installation, at least initially. Start-up cannot proceed smoothly until the entire installation workforce understands this new mindset.

The chemical storage mission has been static for more than 40 years, through numerous installation and Army Materiel Command (AMC) reorganizations. The mission has consisted primarily of maintaining safe storage conditions, conducting surveillance operations, being prepared to respond in the unlikely event of a chemical accident or incident, and occasionally locating and isolating leaking munitions. In the past 20 years, the CSEPP mission has been added, but it, too, has become part of the status quo. Except for addressing occasional leaking munitions, the chemical storage depot or activity has determined its own schedule and pace. With the advent of the demil plant, this concept has changed, and it can be difficult to accept if the installation is not prepared.

The mission changes dramatically when the plant begins operations. Requirements are more dynamic and demanding. In addition to continuing the old mission and doing it well, there is a new primary mission – to provide materials to the chemical demil plant 24 hours a day, if needed. This change permeates every aspect of operations from chemical mission and emergency operations center (EOC) operations to security, leave, holidays, and overtime pay. The changes can be overwhelming if actions are not taken in advance to prepare for them.

To develop the necessary new mindset, begin the process early. Involve the entire workforce. One method may be to start with a series of brainstorming sessions for supervisors to determine how the new mission will affect the current way of thinking. For BGCA, include those elements from the installation that will also be impacted, such as security, public works, risk management, clinic, etc. Once brainstorming has been accomplished at the supervisor level, brainstorm with respective workforces. Make sure the workforce understands the coming changes. Get the workforce involved with providing input on how best to handle the changes. The more the workforce is involved, the more personnel will be committed to the changes and the easier it will be to develop the new mindset.

2.2 Lesson 2: Develop Documented Notification and Reporting Procedures

An issue that was universal at the four operating sites was that of notification and reporting procedures. Notification and reporting procedures fall into four general categories for the chemical depot or activity:

- What and when does the plant report to the installation EOC?
- What does the EOC report to the off-post community per CSEPP agreements?
- What does the EOC report to higher headquarters (i.e., CMA)?
- What or who is responsible for the reporting requirements of Army Regulation (AR) 50-6 Chemical Surety?

There will be a number of new reporting and notification issues once the plant starts operations. During the storage mission, it took a number of years to work out the reporting and notification issues. This is especially true for CSEPP reporting, which has been refined through the years in Integrated Process Team (IPT) meetings and Memoranda of Agreement (MOA) between the installation and the off-post community. The local community will take a new interest in reporting and notification because it will want to know when "something" happens at the plant, but this is new territory. The local community may not know what that something is, so it will need to be defined. One way to do this is to have plant personnel involved in local IPT meetings well before plant operations begin. After the off-post CSEPP community is educated on plant operations and potential events, there can be mutual agreement on which events require notification to the off-post community as well as the timeframe for notification in accordance with the local CSEPP MOA.

The demil plant is an entity separate from the chemical storage installation or activity. Historically, plant personnel have been reluctant to share information with the installation EOC or may not have done so in a timely manner. They may have believed that an event was not significant or that the EOC personnel might have overreacted because of a lack of understanding. Similarly, the EOC personnel may not always have pressed the plant control room for information because they may not have had a good understanding of plant operations. To facilitate communications, it is essential to establish a direct hotline between the plant control room and the installation EOC. Regardless of the reason, incidents have occurred at all four incineration sites. These incidents were, at least, embarrassing and could have led to more serious problems had they not been resolved.

Reporting plant events to CMA has been an evolving process. Early on, even though the chemical storage installation or activity knew it was responsible for reporting plant events to CMA, it was not clear what was to be reported. Since then, CMA has developed more specific reporting requirements. It is critical that the installation, and specifically the EOC staff, know and understand these requirements.

AR 50-6 reporting responsibility needs to be clearly defined. The regulation spells out the various categories to report, but not who has responsibility for reporting them. The chemical installation or activity may be the best organization to make these regulatory reports. Reporting responsibility needs to be spelled out in the policy between the plant and the installation.

There are a variety of ways to resolve the reporting issues discussed above. The four incineration sites resolved them after plant operations began. With a little foresight and planning, PCD and BGCA should be able to resolve reporting issues well before plant operations begin. Some of the recommended practices include:

- Have plant personnel attend CSEPP IPT meetings to help define what events the community wants reported to it.

- Conduct cross-training to the familiarization level between plant control room personnel and EOC staff so that they better understand each other's roles, needs, and operations.

- Establish mutually agreeable reporting requirements between the installation and the plant.

- Document the results in a clear manner (matrices and MOAs).

The four incineration sites engaged in a laborious process of defining, refining, and documenting reporting requirements after plant operations began. Much can be learned from their efforts. One of the best and most comprehensive reporting matrices is the one ANCA developed shortly after plant operations began. It included CSEPP, AR 50-5 and higher headquarters reporting requirements. The first version of the reporting matrix was completed in September 2003. The current version, which has changed only slightly over the years, is provided as an example in Appendix D. Appendix D also includes reporting policy.

In addition to developing reporting requirements and policy, UMCD employs a unique method to meet its reporting requirement to the off-post community. It is presented here for information only; this particular arrangement may not work at other installations. In a room adjacent to but separate from the UMCD EOC, the county has a liaison officer available around the clock who is the link between the installation and the off-post community for reporting nonemergency events. The liaison officer has the necessary communication equipment to accomplish the mission. This arrangement is by verbal agreement only, and no MOA exists to document it. Duties of the liaison officer include:

- Monitoring WebPuff, the browser-based emergency management information system;

- Performing hazard analysis for the off-post community;

- Entering data on WebEOC (Web-enabled crisis information management system) for the off-post community; and

- Acting as the nonduty hour warning point for the immediate response zone (IRZ).

Regardless of the process used to ensure timely notifications are made, it is also important to ensure the activity/installation Public Affairs Officer (PAO) is included. The PAO can then be proactive, rather than reactive, in providing timely information to the public and media if required.

2.3 Lesson 3: Be Sensitive to Off-post Community Concerns about Plant Start-up

The issues in this lesson can be quite complex. Historically, they have involved the installation, the Chemical Demilitarization Program, the Army, and the Federal Emergency Management Agency (FEMA). The installation plays an active role regarding some of these issues. In others, it does not, yet it still must remain sensitive to the issues presented. This is not always easy because the local installation is often considered "the Army" to the off-post community, which does not hesitate to express its concerns, needs, and desires to the installation.

The CSEPP was established to ensure that maximum protection from a chemical agent release is provided to chemical workers, installation personnel, and the off-post community. As plant construction comes to a conclusion in Colorado and Kentucky, the off-post community will undoubtedly take a hard look at the issue of maximum protection and develop a new list of requirements it believes must be met before plant operations can begin. Historically, this has happened to some degree at all four incineration sites. These new requirements can include new or improved roads (for evacuation), additional fire or emergency medical equipment, enhanced communications equipment, medical facility upgrades, round-the-clock staffing of county EOCs in the CSEPP IRZ, and any number of other issues to provide better protection to the public or increase emergency response efforts off post.

The installation has no say in the resolution of these types of off-post issues. Higher Army headquarters and FEMA work with the off-post community to determine valid requests. Historically, the Army and FEMA have resolved these types of issues with no delay to plant start-up dates. For the most part, the installation should attempt to remain neutral in the discussion of these issues at IPT meetings and other forums, becoming actively involved only when higher headquarters determines the installation may be able to help resolve the issue. There is a greater likelihood of such requests in Kentucky, where a much larger off-post population lives and works near BGAD and where the installation stores nerve agent. PCD only stores mustard agent, and the population density around it is low; requests in Colorado will likely be lower than in Kentucky.

Calhoun County, Alabama, has a large off-post population surrounding ANAD. Two community issues were satisfactorily resolved: (1) over-pressurization of schools/facilities and (2) personal protective equipment (PPE) for residents of the Calhoun County Pink Zones. Both of these issues

involved projects that took considerable planning, funding, and time to complete. Each could have prevented the timely start-up of plant operations.

Calhoun County requested and received approval for over-pressurization systems for all schools in the IRZ and select schools in the protective action zone, as well as a few other select facilities. This project was funded by the Army and managed by the U.S. Army Corps of Engineers. The project was to be completed by the planned plant operations start date in August 2003, but it fell behind schedule and threatened plant start-up. A compromise was reached that was satisfactory to the off-post community. Because plant operations begin slowly and then ramp up to full operations, there is no initial need to have a large number of munitions at the plant. The installation and the plant determined that munitions could be moved outside of school hours on weekends and late in the afternoon on weekdays, since there was sufficient late afternoon daylight during August and September. CMA concurred, and a potential delay to start-up was averted.

Calhoun County created eight Pink Zones within its IRZ. These zones formed a ring immediately around ANAD and Pelham Range to the north. Calhoun County determined that, due to high populations in these zones and the short reaction time for a release, adequate protection of the public needed special consideration. Calhoun County requested PPE, such as escape masks and room air filters, for residents in addition to the standard shelter-in-place kits provided by the CSEPP. This request was approved by the Army and FEMA, but once again required considerable planning, funding, and time to complete before plant start-up. It was completed well before the planned start-up date and posed no potential delay. The lesson learned from these two Calhoun County examples is that the installation needs to monitor closely the concerns of the off-post community, ensure those concerns are brought to the attention of CMA and FEMA, and prepare to assist in problem resolution as needed.

The installation must be involved in changes to the off-post MOAs that may be needed prior to plant start-up. This includes not only any CSEPP MOAs with the off-post community, but also any of the routine MOAs that the installation maintains for mutual aid with the local community. MOAs should be reviewed at least 1 year before planned start-up to allow adequate time to make any necessary changes. None of the installations reported any major MOA changes prior to start-up, as they had worked diligently to keep existing MOAs current. Three situations occurred in Alabama, however, that required establishing new agreements rather than changing the CSEPP MOA. These events occurred because the CSEPP MOA in Alabama was between the installation and the State.

The first MOA crisis, which almost delayed plant start-up, involved the Calhoun County Pink Zones. In addition to the requirement for additional PPE, Calhoun County believed there was inadequate time for the county EMA to receive notification from the installation and in turn provide protective action information to the public. Calhoun County insisted that ANCA make initial activation of the warning devices and provide the protective action information to the public in the Pink Zones. In theory, this was allowed under a Department of the Army Memorandum dated 22 June 1994, Subject: "Chemical Stockpile Emergency Preparedness Program (CSEPP) Public Alert and Notification Policy."

As is often the case, theory and practice were not easily reconciled. ANCA and the Calhoun County EMA began discussions on this issue in the summer of 2002 but could not reach agreement. Proposals and counter-proposals were offered until March 2003, when the Army's CSEPP Program Management Office called a meeting in Calhoun County. There were attendees from the CSEPP Program Management Office, CMA, ANCA, and ANAD as well as Calhoun County representatives. Army and Calhoun County attorneys worked out the final agreement, which became known as the Pink Zone MOA. Even though this crisis was resolved in March 2003, the issue was still not fully settled. Because of equipment and training issues, the Pink Zone MOA could not be implemented until just a few days before the scheduled plant start-up date. A copy of this MOA is provided in Appendix E.

The other two new agreements were less critical but still important. They were required to gain the governor's approval to begin operations. Through an MOA reached between CMA and Talladega County, ANCA does not move munitions from Friday through Sunday on the two weekends each year when races are held at Talladega International Speedway. This may be a prudent arrangement, considering the nearly 200,000 temporary "residents" in close proximity (about 8 miles) to ANAD on those weekends. The other MOA is between ANCA and the Alabama National Guard Training Center, which operates Pelham Range just north of ANAD. This MOA defines certain meteorological conditions and training situations on Pelham Range that would restrict movement of munitions.

The lesson learned from this discussion is that the installation needs to identify and address off-post community concerns as early as possible. The community's concerns will increase as the plant begins operations. The installation needs to be sensitive to all community concerns, resolving those that can be resolved and relaying those that cannot to the proper agency. One of the greatest potentials for a delay in plant start-up exists when there are unresolved community concerns. Historically, the CSEPP communities have never hesitated going to their congressional delegation to ask for additional political pressure when they felt it was to their benefit. A strong public outreach and information program prior to plant start-up will help alleviate the political pressure. An outreach and information program is discussed later in Section 2.8 (Lesson 8).

This section on community concerns cannot be concluded without a brief mention of the Citizens' Advisory Committee/Commission (CAC) and Local Emergency Planning Committee (LEPC). None of the four incineration sites reported any major issues with either of these entities. To summarize the advice given in interviews, attend meetings, show interest, keep the off-post community informed, and answer the community's questions. It is apparent that these organizations are more involved in both Colorado and Kentucky. Building a good, trusting relationship with them is critical.

2.4 Lesson 4: Work with the Plant to Develop a Munitions Delivery Plan

As stated previously, the chemical installation or activity's primary mission once plant operations begin is to deliver munitions to the plant at the rate the plant needs to maintain its

operating schedule. This is an area in which the current plan is different for the ACWA sites than for the incineration sites. At the four currently operating sites, the chemical activity or installation is responsible for all operations, from the removal of munitions from the storage igloos to loading them on vehicles and finally to delivering them to the plant. Transfer of custody for the munitions occurs at the plant.

At ACWA sites, the chemical activity or installation will remove the munitions from the storage igloo, and plant contract personnel will deliver the munitions to the plant. It has not yet been determined if chemical activity or installation personnel will load the munitions into modified ammunition vans, or enhanced on-site containers (EONCs), or if plant personnel will be responsible for this activity. In either case, transfer of custody will occur on the igloo apron, not at the plant. This represents a change in procedure, and it is not yet clear how this will impact the discussion below. The need for planning and coordination can only increase because a new element, the contract transport crew, is now involved.

There are two basic methodologies by which munitions delivery can be planned. The first is the "pull" method, in which the activity or installation simply waits for the plant to ask for munitions and responds by pulling the requested amount. The second is the "push" method. In this method, the activity or installation sends as much munitions to the plant as the plant can store. The push method allows the activity or installation to have more control over scheduling of personnel, thus reducing overtime costs resulting from having work crews waiting for the plant to request munitions. The operational reality is that no installation or activity uses one method or the other exclusively, but rather achieves a compromise. Those installations that operate more like the push method reported smoother operations, a decrease in worker frustration, and a more efficient flow of munitions to the plant. Those operating in an environment more like the pull method were under more stress, used more overtime, and tended to have more paperwork delays. If the activity or installation could not respond to a pull request, it could be accused of not meeting its mission to deliver munitions on schedule.

Regardless of where the two ACWA sites operate along the spectrum of pull and push, the activity or installation needs to plan for more overtime; have a plan whereby work crews can be scheduled 6 days per week, if need be; and account for times when munitions cannot be delivered to the plant because of meteorological conditions or other reasons. The closer munitions delivery is to the push method, the more likely the activity or installation will have to deliver munitions only 4 days per week.

Another consideration in munitions delivery is specific lot number requests from the plant. These will occur periodically and will more likely happen during the start-up of a new campaign because of permitting or other requirements. These requests should be kept to a minimum, and the installation or activity should only agree if there is a valid reason for it. Specific lot number requests nearly always involve additional work, as munitions will need to be moved or rewarehoused to gain access to the specific lot. The best plan is to empty storage igloos from front to rear. Communication and coordination are essential so that any requests for specific lots can be fully understood, planned for, and not come as a surprise.

2.5 Lesson 5: Establish Working Groups to Look at Each Support Issue

No matter how self-sufficient the plant is, once it begins operations, the installation or activity will have an increased support requirement for its new mission and will also support certain aspects of plant operations. The best way to meet these requirements is to identify them early and establish working groups to address each one. These working groups should be established at least 18 to 24 months prior to scheduled plant start-up. Working groups used at other sites include:

- Protective Equipment, Masks, and Laundry;
- Accountability of Munitions;
- Chemical Weapons Treaty Requirements;
- Hazardous Waste Generation and Disposal;
- Equipment Issues; and
- Automation Issues.

This list is not all inclusive. When establishing working groups, stakeholders at each ACWA site should thoroughly examine the working groups needed at each site. Security/Chemical Surety is another important area; it is discussed in Section 2.6 (Lesson 6).

Second only to developing the working groups is establishing a process to properly document, coordinate, agree to, and implement the decisions of the working groups. In general, the products of working groups will be meeting minutes, policy papers, plans, etc. The creation of these documents alone does not in itself mean that all stakeholders agree to or are even aware of the action. This is especially true prior to plant start-up, when a numbers of actions that involve the plant and the chemical activity or installation will converge in a short period of time. PBCA discovered a problem with its coordination documentation during a Mega Team visit in 2004. PBCA developed a coordination policy and coordination routing form specific to chemical demil issues. This is a good method to document work group coordination. The original 2005 policy, the updated 2009 policy, and the forms are provided in Appendix F.

2.5.1 Protective Equipment, Masks, and Laundry

PPE, masks, and laundry were major issues at the four incineration sites. These issues required considerable planning on the part of the activity or installation because of significant manpower increases and facility expansion. The lessons learned from these sites, however, will be of limited value for PCD and BGCA because the ACWA program is taking a different approach. The ACWA plants are still working out the details with their respective activity or installation, but the basic plans have been made. The key difference is that the facilities to support PPE, masks, and laundry were designed and built by ACWA at both locations as part of the plant construction process. This will greatly reduce the burden on PCD and BGCA.

At the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP), the contractor will also provide the PPE, masks, and laundry services to support plant operations. It may appear that PCD will not have issues in this area, but that is not necessarily the case. PCD still will have the responsibility to provide support for its personnel. When PCD personnel begin operations to remove munitions from the storage igloo for destruction, its PPE, mask, and laundry requirements will increase. If it is not already part of PCAPP's plan to take this increase into account, PCD will have to determine what this increased requirement will be and ensure it will be covered.

The situation is somewhat different at BGCA. The Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) will build the facilities, but BGCA will have to run them and provide the protective equipment and masks. According to the ACWA Program Office, facilities have been completed, and BGCA personnel have begun operating from them. Now that the facilities are complete, BGCA needs to look at space requirements for the items it will be storing to support operations. Even though new facilities were built at ANCA, additional storage was still required in empty igloos and CONEXes to maintain a sufficient supply of items. Work with the plant to determine needed commercial items not yet stocked by the installation. Resolve accountability issues for equipment and clothing provided to the plant; this will require considerable coordination with the chemical activity or installation to determine requirements and procedures and to negotiate for the additional personnel and equipment funding to support plant operations.

A working group should be established to develop PPE requirements based on the plant's concept of operations and the chemical activity's additional requirements to make igloo entries. Once PPE and mask requirements have been determined, the person-years needed to support the new mission must be determined. A fivefold increase in the person-years was not uncommon at the four incineration sites, depending on the preplant mission and staffing already in place. ANCA's calculation for additional person-years for mask support, for example, is provided in Table 1. Similar calculations will need to be performed to determine additional person-year requirements for protective suits and laundry operations.

Table 1 does not consider mask support of additional security personnel hired when plant operations begin. This is because the additional requirements for plant operations at ANCA were included in a 2003 hiring action to support an installation vulnerability assessment that was conducted. Any new security personnel hired as part of plant start-up will need one mask each with a semi-annual inspection requirement.

If the protective equipment facilities built at PCD and BGCA do not include back-up systems for such things as compressed air, heated water, and electricity, it would prudent to revisit the need for these critical systems. A prolonged down time of any of these system will translate to down time for the plant.

2.5.2 Accountability of Munitions

The activity or installation needs to consider accountability of munitions prior to plant start-up. The two ACWA sites will not have some of the same issues that the four incineration sites faced

during their start-up period. The Chemical Accountability Management Information Network (CAMIN) is the automated system that all the storage sites now use to manage the chemical stockpile. Munitions are dropped from CAMIN once they are destroyed. This system was not available when DCD began operations, and it was still going through development and modification when the remaining three sites began operations. Today, it is a more user-friendly, mature system, and all sites follow the same procedures when working with the system.

Table 1: ANCA Person-years for Mask Support

Mask Support
500 masks for system contractor office personnel who will not make toxic entries on a normal basis tested semi-annually. • 1,000 masks × 1.219 technical estimate/1,620 person-hours = 0.752 person-years
320 masks issued for toxic entries tested each time personnel are exposed to a toxic vapor environment (estimated 24 toxic entries per year). • 7,680 masks × 1.219 technical estimate / 1,620 person-hours = 5.778 person-years
80 hazardous materials masks for emergency response tested semi-annually or any time exposed to a vapor environment (estimate test 3 times per year). • 240 masks × 1.219 technical estimate/1,620 person-hours = 0.180 person-years
50 masks for system contractor visitors, which will be tested each time mask is issued to a different individual and semi-annually (estimate 200 per year). • 200 masks × 1.219 technical estimate/1,620 person-hours = 0.150 person-years
50 masks issued to field office personnel tested semi-annually. • 100 masks × 1.219 technical estimate/1,620 person-hours = 0.075 person-years
25 field office visitor masks issued and tested each time mask is issued to a different individual and semi-annually (estimate 200). • 200 masks × 1.219 technical estimate/1,620 person-hours = 0.7150 person-years
48 additional storage, inventory, surveillance, lab personnel who will require 3 masks each tested semi-annually. • 288 masks × 1.219 technical estimate/1,620 person-hours = 0.216 person-years
4 office personnel for ANCA who will require 1 mask tested semi-annually. • 8 masks × 1.219 technical estimate/1,620 person-hours = 0.006 person-years
Total masks: 7.308 person-years

The activity or installation should plan on submitting a Materiel Release Request (MRR) to CMA for the entire quantity of a particular type. CMA prefers a release period no longer than

180 days, but it has approved MRRs for a longer period. This allows for maximum flexibility in selecting the munitions to be moved to the plant.

Once the Materiel Release Order (MRO) is received from CMA, munitions can be transferred from storage to plant on that MRO. The Department of the Army (DA) Form 4508 (Ammunition Transfer Record) is then prepared as shipments are processed. As mentioned above, transfer of custody at ACWA sites will take place at the storage igloo rather than the plant. Procedures for transfer are still being developed; at a minimum, a contractor authorized to sign for the transfer of custody will need to be at the storage site as each shipment is loaded for shipment to the plant. Also, procedures need to be developed to ensure the DA 4508 follows each round through the plant and to return the certificate of destruction to the storage activity or installation. Additional procedures, to be discussed later, need to be in place for treaty-tagged rounds moved from storage to the plant. An Accountability of Munitions Working Group should be established at each ACWA site prior to plant start-up to develop and document the procedures to be followed.

In addition to the paperwork considerations, some sites have additional measures in place to assist in tracking munitions. ANCA has developed the most complex system of colored tags. The ANCA color tag system is as follows:

- Blue numbered seal – EONC is loaded;
- Red numbered seal – EONC is loaded and contains a treaty-tagged item;
- Green plastic tie – EONC is empty and ready to return for loading;
- Red plastic tie – EONC contains rejects or plant explosive storage limits are exceeded; and
- Orange plastic tie – empty with positive reading.

The numbers from blue and red seals are also recorded on the DA 4508 as an additional tracking measure.

UMCD uses a less elaborate system that identifies treaty-tagged items only. It places a red tag on any pallet containing tagged items or a red magnetic tag on any tagged ton container. This method is only visible when the EONC is opened at the plant. A variety of tagging methods can be used, or perhaps no tag system will be needed at the ACWA sites because the plant will be taking custody at the storage igloo. This issue should be addressed by the Accountability of Munitions Working Group.

2.5.3 Chemical Weapons Treaty Requirements

The chemical weapons treaty requirements will be substantially increased once plant operations begin. Each installation has only one Treaty Compliance Officer (TCO). The TCO is the individual responsible for ensuring that all applicable treaty requirements are met. Because of

this responsibility, the TCO is the logical person to lead the Chemical Weapons Treaty Requirements Working Group. Installation TCOs are aware of treaty requirements, so they are not discussed in detail here. Below is a list of some key requirements:

- Procedures to track treaty-tagged munitions from storage to plant;
- Procedures to ensure the 4-hour notification requirement is met;
- Detailed facility information;
- Facility agreement;
- Final engineering review;
- Preparation for the Organization for the Prohibition of Chemical Weapons (OPCW) initial visit; and
- Preparation for the OPCW final visit.

Although no incineration site reported major problems in planning and implementing treaty requirements for plant operations, the requirements are rigid, and a great deal of advance planning is required. The working group can do much of the preliminary work, but a more formal host team should be convened early in the process that would do the final planning and support treaty requirements during plant operations. This host team should consist of the TCO, the Treaty Compliance Coordinator from the site field office, the plant contractor's Treaty Compliance Representative, and the Defense Threat Reduction Agency team chief.

The host team must be ready to function when the plant begins operations. Even though the host team has plant and field office representatives on it, the control room needs to provide timely information to the host team. Lack of timely information can be a problem because the treaty inspectors are in the plant monitoring around the clock. They also have digital cameras for recording many activities. A potentially serious situation may arise – even if not a treaty violation – if the treaty inspectors become aware of a situation that has not yet been communicated to the host team. This is an extension of the notification problems discussed in Lesson 2. The host team needs to develop reporting procedures and build the same kind of trust and confidence that are required between the plant control room and the installation EOC.

Another problem that was reported was with the written 4-hour notification requirement. Potential notification violations or nonshipments can occur if a plant either does not know conclusively how many munitions need to be delivered on a given day or if a portion of a shipment is cancelled and then the plant decides it is needed after all. The recommended practice is to list on the 4-hour notification message the maximum amount of munitions that could possibly be shipped that day, and then, at the end of the day, cancel any that were not shipped.

Another practice worthy of consideration is one used at ANCA. ANCA lists every treaty-tagged item on a separate DA 4508. This practice accomplishes a number of things. First, it gives more visibility, in addition to the red numbered tag used by ANCA, to the fact there is a treaty-tagged

item in the shipment. Second, it allows completion of the paperwork and dropping from CAMIN the other rounds in the shipment that were not treaty tagged in the event that treaty-tagged rounds are not processed immediately, which was often the case at ANCA. Finally, it provides a separate listing of the round on the 4-hour notification. See Appendix G for an example of a 4-hour notification message with treaty-tagged rounds listed separately.

2.5.4 Hazardous Waste Storage and Disposal

No two installations handled the issue of hazardous waste storage and disposal in the same manner. This is to be expected because individual State requirements are so varied. The common factor at all four locations was the generation of a large amount of hazardous waste from both the plant and the activity and/or installation. Storage and disposal of hazardous waste must be resolved before plant operations begin. Resolution requires that the activity and/or installation and the plant environmental officers work with State regulators to agree on acceptable procedures and obtain the required permits. This is often a time-consuming process, so the Hazardous Waste Storage and Disposal Working Group needs to begin its activities early.

The solution used at UMCD is complete separation between the installation and the plant with respect to hazardous waste. The only service UMCD provides to the plant is suitable igloos within the chemical limited area (CLA) in which the plant may store its waste. The plant and UMCD have separate Resource Conservation and Recovery Act (RCRA) permits. Each is entirely responsible for the generation, storage, inspection, maintenance, and ultimate disposal of that waste. The State treats and inspects each as a separate entity. UMCD has developed a form to help meet its hazardous waste tracking requirements. An example of this form is in Appendix H. Depending on the regulatory requirements in Colorado and Kentucky, PCD and/or BGCA might find it useful to develop such a form.

There is a more cooperative arrangement between the plant and ANCA in Alabama. ANCA stores all hazardous waste generated by its own activities and by plant operations under the ANAD storage permit. The plant in turn is responsible for the ultimate disposal of all waste from itself or ANCA. The plant is responsible for transporting its waste to the storage location. When the plant calls for disposal of hazardous waste, ANCA transports the waste to the plant. ANCA maintains all the hazardous waste storage igloos and is responsible for all required periodic inspections. If any leaks are discovered during inspections, ANCA is responsible for repackaging its waste but notifies the plant contractor to repackage plant-generated waste as needed. Although not required to do so, ANCA enters the hazardous waste into CAMIN. This facilitates tracking the waste to meet State reporting requirements.

Other possible solutions would most likely involve the plant or the activity and/or installation being entirely responsible for hazardous waste. This arrangement may not be satisfactory to the organization that has the responsibility unless there is good justification for it. The two solutions discussed are not so much a result of site preference, but rather tailored to satisfy State requirements as efficiently as possible. There may be some latitude in how the plant and the activity and/or installation handle hazardous waste as long as State regulators agree to the procedures.

There is one final comment on hazardous waste. Space available to store hazardous waste will be at a premium. It is critical that the Hazardous Waste Storage and Disposal Working Group identifies as many potential waste streams as possible before operations begin. After the potential waste streams have been identified, look at available storage space. A serious problem that could result in a violation can arise if igloos do not empty as fast as waste is being generated. When looking at available space, do not assume that secondary hazardous waste can immediately be moved back into that igloo; the State may require improvements to the igloo (e.g., sealing floors).

2.5.5 Equipment Issues

Minor property issues may arise, but the main issue of concern to the four incineration sites is the ownership and maintenance of the on-site containers, EONCs, tractors, and trailers. This may not be an issue at PCD and BGCA. The ACWA Program Office recently stated that the plant will be responsible for the tractors, trailers, and modified ammunition vans for use at PCAPP and the EONCs for use at BGCAPP. This issue should not, however, be totally ignored in the planning phase at the two ACWA sites. Even though the plant is responsible, this does not mean that installation support will not be required.

BGCAPP may have calibration issues of EONC seal testers and perhaps other equipment needing calibration. Until it is determined who will load the modified ammunitions vans and EONCs, ownership and maintenance of the propane-powered forklifts will remain unresolved. Some government-furnished equipment will be provided to the plant, and it can be assumed that the plant will need support from the activity or installation for equipment maintenance. The Equipment Issues Working Group can identify and attempt to resolve these issues.

2.5.6 Automation Issues

With ever-changing Army information assurance requirements and the increasing need for automation security, the issue at PCD and BGCA will be more complex if connectivity to the Army network at the plant is needed. An Automation Issues Working Group can look at this issue. It is particularly well advised to convene this working group if there is a need for connectivity, such as a computer to view the installation's WebPuff output in the control room. Another consideration is connectivity to the Chemical Protective Equipment Tracking System, but the requirements, if any, will not be significant. Plan ahead to determine if the installation Directorate of Information Management will have to run a local area network line to the plant.

2.6 Lesson 6: Recognize that Security Requirements Can Threaten Plant Start-up

Unresolved security issues can threaten plant start-up operations. If security issues are not resolved, the plant cannot be tied into the CLA and cannot receive munitions for processing.

Security issues can be divided into two major areas. The first area is the requirement for additional security forces to support the expanded CLA and plant. This is discussed in Section 2.9 (Lesson 9). The second area is tying the plant into the CLA and establishing lock-down for the plant.

The security issues ranged from a few at DCD to major ones at PBA. Security at DCD was relatively straightforward because it had been operating the Chemical Agent Munitions Disposal System (CAMDS) for years. It was already familiar with the issues involved in establishing new and expanded CLAs. In addition, CAMDS was winding down operations as Tooele Chemical Agent Demilitarization Facility was starting operations, so few new guards were required. New guards were trained in CAMDS before moving to the demil plant. PCA, on the other hand, not only needed many additional security personnel, but also had to establish a second CLA for the plant and develop transportation corridor procedures because the plant was not located adjacent to the CLA. This was compounded by PBA/PBCA's getting a late start with its security planning and needing to catch up as the start-up date approached. Once again, this demonstrates that the biggest lesson to be learned is to start planning early.

The following lessons learned were provided by ANAD/ANCDF:

- Develop a strong relationship among the installation, contract security personnel, and the plant as soon as possible.
- Establish a security working group for the life cycle of the project.
- Take a holistic approach to security.
- Leverage technology (automated access control) to maximize efficiencies for security in processing.
- Ensure all players are kept informed of security projects.
- Establish well-thought-out and complete plans for major security happenings. Examples are modified lock-down, lock-down, and actual tie-in.
- Do not allow the process to continue if something is wrong.
- Be firm.
- Be honest.
- Perform a final check of security systems (e.g., intrusion detection system [IDS], lighting, access control, accountability, key and lock control, badging) before actual tie-in.
- Establish a security culture early and enforce it continuously.

One site reported that its greatest obstacle was the lack of a solid security concept plan. The installation, the chemical activity, and the plant failed to work together to develop a coordinated plan, perhaps each assuming that it was the other's responsibility to develop and coordinate a plan. To avoid this issue, begin planning early for a solid concept and plan. Consider having security representatives on all appropriate working groups, not just the Security Working Group, or, at a minimum, ensure that the Security Working Group reviews the plans of all other working groups; there are security aspects to many operations that may be neglected if attention to security is not part of the overall process.

One of the universal themes that became apparent from the interviews conducted at the four incineration sites was the need to work with the field office and the plant contractor to develop a proper chemical surety and security mindset. The transition from the construction security mindset to the full operational chemical surety mindset can be difficult. Training of both government and contractor personnel is the key to successfully completing this transition.

As is often the case, situations may arise in which normal security requirements cannot be met in accordance with the applicable regulations. In these situations, a waiver may be necessary. Waivers, however, take time to process and to be approved. Identify any need for waivers early and start the waiver process early.

Additional security considerations are provided in Appendix I. These considerations are a supplement to those provided by ANAD/ANCA above. Each site is unique, so even these lists may not include all issues that may be faced at PCD or BGAD/GGCA. Convene working groups as early as possible to determine the issues unique to each ACWA site and take steps to resolve them.

As mentioned previously, training is key to developing the necessary security mindset. The plant's contract personnel may not be used to the Army's security requirements for operating around chemical agents and weapons. Contract personnel cannot be expected to perform immediately in a system the Army has developed and to which it has grown accustomed over the past 40 years. Time and money will need to be set aside for security training of contract personnel. Once training has been accomplished, there must still be a determination of how best to "open the gates" between the storage CLA and the plant.

One installation, UMCD, used a simulated CLA procedure for 30 days before actual lock-down and opening of the gate between the two areas. It produced and issued training CLA badges, and all actual procedures for entry and badge exchange were used. This approach allowed the contract workers time to get used to the requirements, to avoid carrying prohibited items, and to remember to carry their masks in a no-fault environment. Although this approach is time-consuming and involves some additional costs, it may be the best approach if it appears additional reinforcement is needed after training.

On the other hand, ANAD, believed training alone before lock-down and opening the gate was adequate. The entire training process was accomplished in a 40-hour period, with no practice period. This transition timeline is presented in Table 2.

Table 2: ANAD Lock-down and Security Transition Timeline

Friday, 1 August 2003
Before close of business, test ANCDF perimeter IDS.
Saturday, 2 August 2003
0200 – CLA/chemical exclusion area (CEA) visitor badges are issued to Post 12A.
0400-0500 – Entry Control Facility (ECF)/site is locked down to reconcile personnel count
0500 – Strict in and out processing procedures are enforced for all personnel.
0500 – CLA and ANCDF combine for count.
0700 – Only Chemical Personnel Reliability Program guards should staff Post 12A.
1200 – Duress code is issued.
Sunday, 3 August 2003
0001 – Post 11 activates all ANCDF IDS.
0015 – Post 11 conducts self-test of ANCDF interior alarms and reports any problems to plant control room.
0800 – ANCDF/CLA gate is opened, creating a single CLA.
0800 – Post 11 records all ANCDF alarms, dispatches patrols, and reports problems to plant control room.
0800 – All chemical security policies and procedures are enforced.

Before the gate is opened, a number of questions need to be answered. ANAD provided the following checklist of questions:

- Is the physical security plan complete and signed?
- Is the duress code in place?
- Does fencing meet the appropriate standards?
- Have the fence and manhole locks been hung?
- Has the perimeter lighting undergone a recent light survey?
- Is the ECF operational and staffed?
- Is the automated access control system functional?
- Has an actual test been performed on the IDS sensors?
- Has the IDS maintenance plan been written and approved?
- Are communications up to standards in accordance with AR 190-59?
- Have the IDS and lighting generators been tested and the results recorded?
- Do security communications have the capability of being on battery for four hours?

- Have the IDS and CEA locks been hung and an approved key and lock system been set up?

- Are certification and approval documents provided for the IDS?

To summarize, unresolved security issues can prevent or delay plant start-up. They need to be identified, acted upon, and resolved. Consider the security implications of other start-up plans.

2.7 Lesson 7: Recognize that Integration of Emergency Plans, Training, and Exercises is a Weak Area

This lesson consists of three separate yet related topics: emergency planning, training, and exercises. Because they are related, they are discussed collectively. Emergency planning can delay plant start-up for two reasons. First, well-documented, integrated, and coordinated emergency plans are required before operations can begin. Second, and perhaps of more importance to the off-post community, is that these plans exist and are workable. Problems in this area can result in lowering the local community's confidence level in the readiness of the installation and plant to begin operations. PBCA shared the lesson it learned in this area during the Mega Team visit in the Fall of 2004 and the team's report. An extract from the Mega Team visit report is in Appendix J.

One critical planning issue to be addressed well before plant start-up is mutual support between the plant and installation for a chemical event in either the storage area or the plant. This may seem obvious, but without planning, there can be uncertainty. Planning in this area should determine capabilities and limits, threshold levels for requesting support, how support will be integrated, and finally, who will be in charge in plant or storage area events. Once these issues are resolved, an MOA between the chemical activity and the plant should be executed to document the details of mutual support. The MOA should include the installation's Chemical Accident/Incident Response and Assistance (CAIRA) Plan and the plant's Emergency Response Plan.

PCD raised a question regarding CAIRA plans and RCRA permits. PCD asked, "Is an installation required to submit its CAIRA plan as part of the RCRA permit?" The answer to this question varies from State to State, but the unanimous opinion of the current four plants is that this should be avoided if possible. Including the CAIRA plan with the RCRA permit not only makes the CAIRA plan available for public inspection and comment, but it requires changing the permit every time the CAIRA plan changes. ANAD submits the CAIRA plan as an attachment not subject to comment. When the CAIRA plan is updated, ANAD simply replaces the attachment. This is the closest any of the four installations has come to including the CAIRA plan as part of the RCRA permit.

MOAs and written plans need to be enacted if they are to be effective. Once the agreements and plans are developed, both the installation CAIRA team and the plant responders need to be trained to perform their mutual support tasks, first separately and then as part of an integrated

team. This takes resources, but is worth the effort to demonstrate the commitment to provide maximum protection to the workforce and community.

The logical progression after training is exercising. The installation needs to coordinate with the plant to ensure that it is included in at least one major CAIRA exercise per year. Ideally, this would be the annual CSEPP exercise. Realistically, the ongoing plant operations at the time of the exercise may limit its ability to participate. PCD and BGCA have an opportunity to implement planning, training, and exercising efforts without the shortcomings experienced at the four incineration sites. As mentioned in Lesson 2, the activity or installation should work with the plant to ensure that control room personnel and EOC staff receive some level of cross-training, at a basic level, in each other's roles and responsibilities. This increased awareness of the other's job enhances the trust and confidence between control room and EOC personnel and increases the communication between them when incidents occur. Offering select plant personnel other CSEPP and hazard prediction classes can also increase the communication level.

2.8 Lesson 8: Be Ready for a Sudden Increase in Public Interest Prior to Start-up

There will be a drastic increase in public interest and concern in the months preceding plant start-up and for weeks after start-up. A well-defined, coordinated public information program is crucial to building the public trust and to answering all questions. Both PCD and BGCA have well-established CSEPP public information programs. ACWA has taken a proactive approach, using all technologies to reach the public regarding the ACWA technology and the state-of-the-art plants being constructed. These outreach programs are currently running parallel to each other, giving their own messages. In the months before plant start-up, the public will tend to see CSEPP and demilitarization as a more integrated program. Therefore, the public outreach program will need to be more integrated as start-up approaches. A good outreach plan needs to be developed. UMCD took this approach in its outreach program. See UMCD's Start of Operations Activities Timeline in Appendix K.

Activist groups opposed to plant operations will likely be more active in the months before start-up. Their goal will be to delay operations as long as possible. A good outreach program must be proactive in countering these groups. Well-designed, joint presentations from the installation and the plant at civic organizations, government council meetings, and special events will be an effective way to address potential public concerns.

Do not neglect to educate your workforce. This is an essential part of getting the workforce involved. They live in the community. It is almost certain that they will be approached by other community members, and possibly the media, for information concerning the start of operations. Provide them with fact sheets and other materials to ensure that they can provide good answers to such inquiries. Make sure they know where to refer people to obtain up-to-date information, such as the Outreach Office or Activity/Installation PAO.

As difficult as it may be in these days of increased security, it is important to schedule tours of the EOC and plant to demonstrate safety and emergency preparedness. If the tours must be limited in number, be selective in the invitations to maximize the tour message. Tours for elected officials, key emergency responders, the media, CAC, and LEPC members will provide more exposure than tours for the general public.

Field office and plant personnel need to take an active part in CSEPP IPT meetings in the months before the start of operations. They should give updates on preparations for operations, including both the good news and any problems. This will increase confidence that the Army is not trying to hide anything.

Finally, be prepared for the inevitable. There will be incidents at both the plant and installation EOC after operations begin. During the first few weeks, expect the plant to process, stop, and assess routine incidents. Do not overreact to these start-up problems. Be honest with the public about what is happening.

2.9 Lesson 9: Expect a Significant Delay in Hiring Personnel

The personnel system works at its own pace. Careful and timely planning is essential to ensure sufficient personnel have been hired, have the proper clearances, and, where required, have met all personnel reliability program (PRP) requirements. Allow time to train new personnel to perform their duties. PCD and BGCA will not be faced with as many new hires as the four incineration sites. Neither will they have to hire personnel to transport munitions to the plant. PCD will not have to hire PPE and laundry personnel. This does not mean that additional hires will not be needed. On the basis of the history at the four incineration sites, additional security personnel will be required, as well as personnel to remove munitions from the igloos for transport. BGCA will need to expand its PPE and laundry staff plans accordingly.

Once the personnel requirements are identified, negotiations with ACWA to fund the personnel must be completed. When negotiating this funding, plan on hiring 6 to 12 months early to ensure personnel are trained; enrolled in the PRP, if required; and ready to begin work on the planned start-up date. Employing extra fully trained people for a few months is preferable to insufficient personnel to support start-up operations.

PCD in particular and BGCA to some extent have a timing advantage. There is a pool of trained personnel at the four incineration sites that may be willing to move to PCD or BGCA as operations at the incineration sites come to an end. Take full advantage of this opportunity. The time needed to get new personnel into the PRP can be significant. Requirements for background investigations have become stricter. Allow sufficient time for new hires, especially if a large number of new people are involved. Future delays should not be as long as they were in the past as a result of changes in AR 50-6. Pursue interim PRP for new hires. Have enough escorts while awaiting PRP so that new personnel can be trained. Review installation/activity policy on access for training new personnel.

2.10 Lesson 10: Speak with One Voice, Think with One Thought

The lesson of speaking with one voice and thinking with one thought is the capstone of all the lessons learned. Perhaps such a common-sense statement should not be included here, but all four incineration sites reported problems when they failed in this area. This is understandable when so many activities are occurring at the same time prior to start-up.

Speaking with one voice is the mantra of the Army Public Affairs Office, yet all sites reported a problem with this issue. Often it was a result of failing to think with one thought. In the haste to ensure everything was completed and the community was kept informed, there were many meetings and discussions. These usually were among combinations of the field office, the installation, CMA, and Army representatives speaking to officials or off-post groups. Many instances of various Army representatives contradicting each other at separate meetings, and in some cases, at the same meeting, were reported. This does not instill confidence in local officials and the public. Take time to coordinate positions and statements at all levels. It may seem time-consuming, but it is not nearly as time-consuming as trying to regain public trust after making contradictory statements.

Think with one thought. What does this mean? In essence, it means doing everything that has been discussed in the nine earlier lessons. Have a wide perspective on operational decisions because a single decision may impact multiple areas. If the necessary working groups are formed, planning is done early, actions are coordinated, and information is communicated well among all the stakeholders, thinking with one thought will follow easily. The biggest threat to thinking with one thought is making assumptions: assuming that someone else is taking care of an issue or assuming that someone will agree with a decision without proper coordination and approval. To some extent, the assumption problem was evident at all four incineration sites. With so many actions taking place, never assume anything. That is why the working groups are so important; they avoid the problem of lone wolves taking action.

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3 Summary and Conclusions

When looking at the wealth of information provided by interviewees and the four incineration sites, it was obvious that more details could have been included in this study. However, more detail would not necessarily provide more information. The entire message of this report is summarized in the 10 lessons learned, which are listed below for review:

- Lesson 1: Develop a new mindset.
- Lesson 2: Develop documented notification and reporting procedures.
- Lesson 3: Be sensitive to off-post community concerns regarding plant start-up.
- Lesson 4: Work with the plant to develop a mutually acceptable munitions delivery plan.
- Lesson 5: Establish working groups to look at each support issue.
- Lesson 6: Recognize that security requirements can threaten plant start-up.
- Lesson 7: Recognize that integration of emergency plans, training, and exercises is a weak area.
- Lesson 8: Be ready for a sudden increase of public interest prior to start-up.
- Lesson 9: Expect a significant delay in hiring personnel.
- Lesson 10: Speak with one voice, think with one thought.

Lessons 1 and 10 are the two cornerstone lessons, acting as bookends for the other lessons. These two lessons must be an integral part of the other eight to ensure a successful start-up of the demil plant. As stated many times in this study, each installation is unique. It is likely that either PCD or BGCA will have new issues that have not been discussed here. Use the approach described in Lessons 1 and 10 when dealing with new issues.

Stakeholders at PCD and BGCA should read the material presented here. Ask questions, particularly of those remaining at four incineration sites who were involved with the process. This study should be used immediately; provided to new key personnel; and reviewed periodically as PCD and BGCA progress on the path to demil plant operations. Training workshops can be developed to present the points given here. PCD and BGCA will benefit by sharing with each other their own start-up lessons learned.

The 10 lessons learned in this study should stay in the forefront of the minds of the planners and the workforce at PCD and BGCA. A possible way to do this is to develop a poster or series of posters to keep the lessons learned visible. Heed the hard work and the mistakes of others who have gone before.

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Appendix A: Acronyms, Abbreviations, and Definitions

ACWA	Assembled Chemical Weapons Alternatives
AMC	Army Materiel Command
ANAD	Anniston Army Depot
ANCA	Anniston Chemical Activity
ANCDF	Anniston Chemical Agent Demilitarization Facility
AR	Army Regulation
Army	U.S. Department of the Army
BGAD	Bluegrass Army Depot
BGCA	Bluegrass Chemical Activity
BGCAPP	Blue Grass Chemical Agent-Destruction Pilot Plant
CAC	Citizens' Advisory Committee (or Citizens' Advisory Commission)
CAIRA	Chemical Accident/Incident Response and Assistance
CAMDS	Chemical Agent Munitions Disposal System
CAMIN	Chemical Accountability Management Information Network
CEA	chemical exclusion area
CLA	chemical limited area
CMA	Chemical Materials Agency
CSEPP	Chemical Stockpile Emergency Preparedness Program
DA	Department of the Army
DCD	Deseret Chemical Depot
demil	demilitarization
ECF	Entry Control Facility
EMA	emergency management agency
EOC	Emergency Operations Center
EONC	enhanced on-site container
FEMA	Federal Emergency Management Agency
IDS	intrusion detection system
IPT	Integrated Process Team
IRZ	immediate response zone
LEPC	Local Emergency Planning Committee
MOA	Memoranda of Agreement
MRO	Materiel Release Order
MRR	Materiel Release Request
OPCW	Organization for the Prohibition of Chemical Weapons

PBA	Pine Bluff Arsenal
PBCA	Pine Bluff Chemical Activity
PCAPP	Pueblo Chemical Agent-Destruction Pilot Plant
PCD	Pueblo Chemical Depot
PPE	personal protective equipment
PRP	Personnel Reliability Program
RCRA	Resource Conservation and Recovery Act
TCO	Treaty Compliance Officer
UMCD	Umatilla Chemical Depot

Appendix B: Memorandum for Record

AMSCM-OPAN-CO 5 April 2004

MEMORANDUM FOR RECORD

SUBJECT: Anniston Chemical Activity's (ANCA) Lessons Learned During the Anniston Chemical Demil Facility (ANCDF) Start-Up

PURPOSE: To document lessons learned from the ANCDF Start-Up.

BACKGROUND: After 17 years of planning and debate, the ANCDF successfully began operations on 9 August 2003. Reaching this milestone required the integration of many governmental and contractors' processes and organizations. At times, governmental and contractor missions varied and priorities differed, but we always shared a common goal: to conduct demil operations in a safe and secure manner with no impact to the environment.

DISCUSSION OF LESSONS LEARNED:

1. Communication:

a. Early interaction between government organizations (ANCA, ANAD, the ANCDF Field Office), and the ANCDF systems contractor has been key to a good working relationship. These efforts began between government organizations early in 1990, and expanded to include the systems contractor upon contract award. These efforts encompassed the ANCDF construction and planning stages and continued to grow during the systemization, readiness assessment, and start-up phases. A continued positive working relationship was key to the identification of problems, inconsistencies and early resolutions.

b. The ANCA and the ANCDF Project Management staffs held bi-weekly Coordination Meetings to ensure unity of effort.

c. The Anniston Army Depot stations stakeholders from many different Army commands who support this project. For example, TACOM support includes the ANAD Environmental, Safety, Security, Public Works, and Fire Department offices. Tenant activities such as Anniston Munitions Center (Joint Munitions Command), TMDE Support Group, and Dear Clinic (MEDACC) also had support roles. Monthly Internal/External Interface meetings were held to bring all these players to the table to discuss any ANCDF support issues early in the process. These meetings were co-chaired by an ANCDF Field Office representative and the ANCA Demil Officer. Early meetings discovered significant differences between organizations when estimating required levels of support and determining effort levels for various demil processes. These meetings provided a forum to educate, share information, and recommend efficient support alternatives to management. These meetings continue today and have evolved to focus on the ANCDF production schedule, resources, and impacts.

d. Working Groups were formed to successfully staff issues separately and report back to the Internal/External Interface Meetings. The ANCA Demil Officer facilitated working group activities in the areas of emergency response, medical response, hazardous waste, and accountability. In these areas, processes were identified and flow-charted. Once team members achieved consensus, the process were formally documented and joint procedures developed and tested.

e. The consideration and resolution of minor details was key to operational success; our approach ensured that no detail was too minor to be discussed in these meetings. Examples of issues covered were:

(1) Who should pick up and deliver daily laundry for the ANCDF?

(2) Would calibration be required on ANCDF equipment that could be contaminated?

(3) Where is the line drawn between depot facilities maintenance requirements and systems contractor responsibility at the ANCDF?

(4) Who should "own" the EONC? The EONC trailers? Who is responsible for maintenance and repair parts? Who is responsible for periodic testing?

(5) What type of essential information is the ANCDF Control Room required to report to the ANCA EOC?

(6) Where is secondary hazardous waste from the ANCDF stored until disposal? Who is responsible for required periodic inspections? Is the ANCDF waste characterization consistent with similar waste generated in stockpile operations?

f. ANCA aggressively sought operational experience and lessons learned from DCD and the TOCDF. ANCA personnel made several trips to Utah to observe their process, talk to their personnel, to foster relationships with counterparts, and to develop an understanding of the type support Chemical Activity would be expected to provide to the ANCDF. Of course, there were significant differences between the TOCDF and the ANCDF—state environmental requirements, organizational structures, and community support of demilitarization. We tried to not only study how they conducted business in Utah, but what caused them to conduct business in a particular manner. Then we were able to assess what methods would work best in the Anniston environment. We used the information gained to develop baseline staffing, work schedules, equipment estimates, and procedures.

g. The daily reporting requirements for the CMA Operations Center have been revised numerous times since operations began at the ANCDF. These changes require operational flexibility in the Chemical Activity's EOC to support emerging reporting requirements and to coordinate with the ANCDF's staff to assure the data is provided in the required timeframe.

h. CSEPP issues coupled with election year politics had an impact on ANCDF start of operations. An agreement was made with the community outside of CSEPP channels that

allowed the ANCDF to begin limited operations pending the completion of COE collective protection projects. The CSEPP community displayed a heightened sensitivity to all ANCDF activities reported by the media during the start-up process. We initiated daily information reports to the EMAs and then to the media to properly explain plant happenings to avoid misinterpretation of information.

2. Equipment: Ensure that equipment levels can support 6-day operations.

a. EONCs:

(1) All EONCs need to undergo a semi-annual test when first received and again before they are used to transport any chemical munitions. This effort helps identify any problems early in the process and helps familiarize workers with the EONCs and testers.

(2) When performing the required seal test, ANCA personnel experienced difficulty in achieving the manufacturer specifications on several EONCs. The problem was isolated to testing environments. The manufacturer's test was conducted in a temperature-controlled environment while the ANCA test was conducted in the field during periods of high temperatures and high humidity. Consequently, the test could require longer pumping period to achieve less than 1 torr and could take approximately 4 to 24 hours to complete. Our field experiences were conveyed to Mr. Y.F. Lin (PM, ECW) and the design engineers at Sandia National Laboratories. After extensive review and tests, it was concluded that the secondary containment test criteria should be used at Anniston after the EONCs are loaded with munitions. The manufacturer specification test criteria will be used after the EONC receives the 6-month maintenance work or after major repairs have been performed. Contact Tim Sosebee, Commercial 256-235-6041, for additional information.

(3) Recommend other sites conduct a thorough review of their plant's RCRA permit to determine the appropriate level of testing required for EONCs.

b. Personal Protective Equipment:

(1) Protective clothing quantities need to be closely monitored (more is better). At Anniston, a separate depot contractor provides laundry support for cotton goods. Upfront coordination is necessary to assure the volume and turn-around requirements are effectively communicated. The ANCDF operates on a 24/7 basis; therefore, holidays and any time the laundry facility is down for maintenance must be considered and fully coordinated to minimize the impact to ANCDF operations.

(2) Accountability of protective clothing and masks is critical. With the additional support requirement of 500+ personnel, sites need to be proactive in ensuring an accountability system is in place. The Equipment Inventory Tracking System (EITS) is critical to this process and must be maintained. ANCA had to fund an upgrade to our database to ACCESS 2000 when our system crashed. At that time it was discovered that the ANAD DOIM had not been able to automatically backup the database at the ANCDF because it was never shut

down. Since this discovery, the ANCDF has been instructed to take down its system at 2400 hours daily to allow daily automatic backup.

(3) Protective clothing that is disposed of in the Toxic Maintenance Area needs to be tracked with the EITS. At Anniston, RF scanners are utilized in this hazardous area and data is transmitted to a receiver in the mask test facility. This permits tracking of the contaminated items without entering a contaminated area. Contact Al Rosser, Commercial 256-235-6083, for additional information.

3. Personnel:

a. PRP: Getting personnel through the personal screening process has been difficult. ANCA has changed the method used to bring PRP personnel on board to improve the process. Initially, no persons were brought on board until all background checks were completed. This caused delays of over 1 year in several cases. We recommend examining methods to bring personnel on board with a condition of employment to pass the final PRP or UAP screening. This may cause termination of some employees, but the need to get personnel trained and productive quickly may make the risk acceptable.

b. Permanent Employees: The practice of hiring permanent employees in lieu of term appointments has increased the pool of applicants for our positions.

4. Work Schedules:

a. At Anniston we planned for the worst case—6-day work weeks, at the same time looking for shorter schedules with occasional overtime that would still allow us to meet our mission requirements. In our planning for our staffing with the ANCDF Field Office, we recognized that overtime is too costly to sustain over long periods and is no substitute for adequate staffing. We balanced this manning requirement by maintaining open discussion with our employees and the labor union.

b. The number of new employees in our Storage Branch that require an escort in the CLA has impacted our work scheduling. It is a challenge to fully utilize these personnel because we do not have enough badged personnel to serve as escorts. This means we are limited in how we can use these employees. In the short term, we have used badged personnel from other ANCA organizations (surveillance, monitoring, toxic laboratory) to serve as PRP escorts when stockpile mission requirements will allow. This issue also prevents us from breaking our Storage crews into two shifts at this time to more efficiently meet the delivery schedule. Therefore, excessive overtime has been necessary to continue to accomplish this mission.

c. Agreements were made with the community that allowed the ANCDF to begin operations before the completion of all the community protection projects. These agreements placed restrictions on munitions movements, but had limited impacts on operations (given the low initial production rates). With the exception of the two major Talladega race week periods, these agreements expired with the completion of the community protection projects.

d. Planning is the key. We became knowledgeable of ANCDF needs based on production schedules and permit requirements. We shared information with the Field Office and systems contractor on the composition of our agent stockpile and our storage configuration. We strive to plan our holidays and other periods where shipments may be frontloaded.

5. Accountability:

a. The Accountability Working Group (ANCDF contractor and ANCA) jointly developed and refined procedures to maintain accurate accountability and prevent certificate of destruction adjustments.

b. SETH was staged and moved to the ANCDF in EONCs during the systemization phase. In addition to providing a training opportunity for our new storage personnel, these SETH movements proved to be an invaluable tool for testing ANCDF and ANCA accountability procedures. Test treaty notifications, DD Form 4508s, and certificates of destruction, were all prepared and nightly reconciliations were performed. This practice gave visual proof of what could and would go wrong, what would work, and enabled both organizations to make adjustments to improve the accountability process.

c. ANCA established procedures that limit the alteration of CAMIN generated transfer documents. This process reduces the chances of human error that would occur if they were filled out by hand. The only information that must be added to this document is the EONC number and the required signatures.

d. ANCA established procedures to apply color identification tags to the EONC to indicate its status. Four different colors are used:

(1) Blue indicates a loaded EONC for shipment to ANCDF.

(2) Red indicates a loaded EONC containing Treaty tagged items for shipment to ANCDF.

(3) Green indicates an empty EONC coming from ANCDF back to the storage area.

(4) Orange indicates an empty EONC that had been hot at ANCDF and has been decontaminated. This orange tag flags this EONC so that our Storage personnel can monitor the EONC interior to confirm it is no longer hot before opening the door for reuse. A hot EONC would be transported back to the ANCDF Toxic Maintenance Area for decontamination.

6. Security:

a. ADP Security: Several PCs at the ANCDF are contractor provided, but access the depot network (examples: EMIS, HMMS, and EITS). Problems have been encountered getting security patches to auto load; therefore, ANAD DOIM has isolated these systems from the network at times until security patches can be manually loaded. Efforts are continuing to set up auto delivery of security patches on these PCs.

b. Establish a security culture early and enforce it continuously. A strong relationship between government and contract security personnel should be established as soon as possible. The Security Working Group provided a good forum to ensure that all players were kept informed of security projects.

c. A holistic approach to security and leveraging technology (automated access control) maximizes efficiencies for security in processing.

d. Well thought out and a complete plan for all major security events is essential (ex. modified lock-down, lock-down, and the actual tie-in of the ANCDF to the existing CLA). Conduct a final check of security systems—IDS, lighting, access control, accountability, key and lock, badging—before the actual tie-in. Do not allow the process to continue if something is wrong.

7. Surety:

a. The Surety and Security Working Group was a good initiative. The attendees worked on issues relating to surety and security and the required coordination between ANAD, ANCA, and the ANCDF. Many issues were resolved prior to facility operating.

b. Coordination of ANCDF surety and security functions are assigned to one person in the ANCDF Field Office (in this case, a QASAS). This person is also assigned rotating duty as the government shift representative on both first and second shifts. Therefore, there were many times this person's participation was needed in planning/problem resolution, but they were unavailable on first shift. Management has recognized this problem and is seeking alternative ways to supplement the governmental oversight surety function at the ANCDF.

8. Safety: Safety representatives were involved in several different functional working groups through the course of planning for demil operations. The ANCDF Safety Working Group addressed safety related items necessary for facility start-up that proved to pay big dividends. The blending of the ANAD, ANCA, ANCDF FO and SC Safety Programs brought to light issues with which command's regulations applied, what steps were necessary, and other conflicts which served to slow the process. Many of these issues were resolved with the reorganization.

9. Emergency Response:

a. The ANAD, ANCA, and systems contractor representatives met to discuss the integration of the installation Chemical Accident/Incident Response and Assistance (CAIRA) Plan. This effort was very instrumental in developing a comprehensive plan for the installation. ANCDF personnel—the HAZMAT Team, the Management Advisory Team, and medical staff—have been incorporated into the ANAD CAIRA Team.

b. The ANCA and ANCDF training coordinators worked together in planning and evaluating realistic emergency response activities. Feedback was used to enhance training programs and to improve jointly developed emergency response procedures.

c. Orientation and familiarization activities between the ANCA EOC and the ANCDF Control Room assisted the personnel in understanding how each area operated during day-to-day operations and during emergencies. A dedicated phone line was installed between the two locations to communicate critical information. It is an ongoing process to assure the Control Room and the EOC are speaking the same language. This area has improved, but we must remain alert when using acronyms or reporting agent readings to assure that everyone understands the specific location and measurement that is being used so that appropriate actions can be taken.

d. As a result of feedback from emergency response exercises and lessons learned, a reporting matrix was developed to provide a baseline for situations that should be reported by the ANCDF Control Room to the ANCA EOC. This matrix seeks to eliminate confusion and standardize the reporting process.

10. Treaty: The Anniston TCO was involved in several different functional working groups through the course of planning for demil operations. In hindsight, it would have beneficial to form a Treaty Working Group to help integrate the Anniston Treaty Team and better define the roles of the TCO, TCC, and TCR.

11. Public Outreach and Media Relations: From a public outreach/media relations perspective, activities for the start of Operations at the ANCDF were successfully carried out despite an ever-changing and challenging environment. The Westinghouse Anniston Communication Office teamed well with the CMA and ANCDF Public Affairs Officers and the PMECW Outreach Office to provide the community and press organizations with accurate and up-to-date information.

a. Things that worked well:

(1) Pre-event planning by the WA Communication Office ensured Start of Operations public and media events went well. Lists were provided for each WA team member defining their role and responsibility. "Day before" planning meetings ensured everyone was on the same page, determined exactly who from the Army and WA staff would be at each planned meeting, and made all aware of each meeting's agenda.

(2) CMA support was excellent! The CMA Public Outreach and Information Office developed the master public outreach plan for Start of Agent Operations that freed up the WA, ANCDF, and ORO staffs to address time-sensitive critical activities.

(3) The five pre-operational public meetings were well planned and well received. Making available the two project managers, Tim Garrett and Bob Love, sent a strong message that we are one team.

(4) Coordination with the Control Room worked well. The WA Communication Office worked with the WA Plant Manager to ensure news media and only a few VIP visitors were allowed in the Control Room. The Control Room was also extremely helpful in supporting news media requests.

(5) The fiber optics feed from the CHB/MDB closed circuit television system was the highlight of the media event. Reports and VIPs were appreciative that the feed was offered so they could see first hand the destruction of the first rocket.

(6) Providing shade and refreshments for reporters was well received. It also made sense from a safety standpoint.

(7) Coordination with the Maintenance Department is crucial to a successful media event. We had ample, timely assistance in the days leading up to the actual event.

(8) Shooting still photographs and video in the Control Room was challenging to arrange because of the photo pass issue, but well worth the effort.

(9) Having staff show up well in advance of the media/public event is a must. Planning takes care of most of the issues that will come up, but there are other challenges that crop up from time-to-time.

(10) Providing the appropriate back drop or display for a news conference can aid in getting messages out to the public and news media. For example, WA Communications used one of its portable displays, which was widely photographed by the news media. In fact, on the front page of the 10 Aug 2003 Anniston Star, subscribers can easily read, "The world's most advanced system for destroying chemical weapons" in a photo that was published by the newspaper.

(11) Sending out advance employee messages about possible protestors and how to deal with them is important.

(12) The news conference featuring the WA and ANCDF Project Managers worked well.

b. Areas that could be improved:

(1) A more inclusive pre-event meeting the "day before" or the "day of" the Agent Operations event should be considered. All government and contractor employees should be included. This meeting provides the forum to resolve any unanswered questions or issues.

(2) Recommend that more public relations activities be delegated to the systems contractor, including creation of power point presentation for public meetings, drafting news releases/media advisories, fielding telephone calls from the news media and public, etc.

(3) Set a specific time, in relation to planned events, that the news media must exit the site so they don't hang around unnecessarily.

(4) Ensure there are several blank VHS tapes to record feed from CCTV cameras. We almost had a disaster because the Control Room recorded the chopping of the first rocket on a tape that had been previously used to record footage of chopping SETH rockets. If the tape

had not worked, the national news media could have unknowingly broadcast footage of a SETH rocket being chopped with an unprotected employee in full view.

(5) Purchase twice the amount of water you think you will use, especially if the forecast is for hot weather. While there [were] plenty of soft drinks remaining in the coolers that were provided, we almost ran out of water.

(6) Provide a multi box for reporters to plug into. This prevents the taping of microphones to podiums and cuts down on the amount of audio wire that must be run.

(7) Media packets did not have chemical Demil 101 information. We had several reporters who were covering the topic for the first time. Basic information would have benefited these individuals.

(8) Instead of relying on a media outlet to upload the video footage to satellite, consider contracting for a satellite truck to provide that service. Staff would have had to jump through hoops if the ABC couldn't get the footage to load.

(9) Provide a videocassette showing various generic storage and demil scenes and activities. WA had several requests for storage footage.

CONCLUSION:

The success of the ANCDF Start-Up was due to the Anniston Team that is composed of many civilian government and contractor personnel. We cannot overemphasize the importance of communication and integration efforts throughout all phases of this process.

The ANCA POC for additional information on lessons learned is Lisa Gill, Commercial 256-235-4940.

/original signed by/

ROBERT E. JONES
LTC, CM
Commanding

CF:
CMA HQ
All Sites

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Appendix C: Lessons Learned Outline

1. Notification Procedures: plant to EOC to off post/Army
    a. Identifying what information needs to go to whom and when
        i. Off-post
        ii. Higher Headquarters
        iii. DA reporting requirements in AR 50-6
    b. Notification matrix
2. Concerns of off-post community – results in new equipment, agreements, and negotiations – Various
    a. 24-hour staffing coverage for IRZ EOCs
    b. New equipment requirements
    c. Changes to MOAs/Agreements
3. Shipping munitions rounds to plant
    a. Need to be pushed from storage, not pulled by plant.
        i. Encourage plant to take as many EONCs as it can store
        ii. Too many variables, don't want plant to run out of rounds
    b. Anticipate bad weather, and days that AEGL-3 going off post will limit shipments.
    c. Need to be flexible in work schedule for crews.
        i. Four shipping days a week is ideal, but,
        ii. Must be prepared to work six days a week, while
        iii. Trying to minimize overtime.
4. Support Issues, numerous, plan early
    a. Integration meetings, to
    b. Establish working groups on issues, such as:
        i. PPE, Mask, and Laundry
        ii. Accountability of Munitions
        iii. Hazardous Waste procedures
        iv. Equipment Calibration
        v. Medical Support
        vi. Treaty issues
        vii. EONC ownership and maintenance
        viii. Other property issues.
    c. Need to balance requirements vs. capabilities (plant, activity, installation)
5. Emergency Response planning, training, and exercises
    a. Integration of Plant Emergency Response Plan and CAIRA Plan
    b. Involve plant in CAIRA/CSEPP exercise to the maximum possible without degrading plant production
    c. Include plant personnel in appropriate training, such as Spokesperson Training, Hazard Prediction, ICS, etc.

6. Public Outreach and Information – Establishing Trust and Confidence
    a. Outreach Office
    b. Roundtables
    c. Plant Tours
    d. Lunches with Star Editorial Board
    e. Plant Reports at IPT meetings
    f. CAC and LEPC
7. Personnel Issues
    a. Lag time in hiring and getting into PRP causes problems
    b. Possible solutions
8. Automation Issues
    a. Need to address early
    b. Will plant need WebPuff?
        i. How many computers
        ii. Where located
        iii. Training for personnel
    c. Will any plant computers need to be in depot's domain?
        i. If so work out with DOIM early on.
        ii. Increasing network security requirements places more constraints as time goes on.
9. Coordination and Teamwork
    a. Plant, installation, higher headquarters need to coordinate.
    b. Need to speak with one voice to community.
    c. Failure to coordinate can send different messages and lower the community's trust and confidence in what the "Army" is doing.

Appendix D: Reporting Procedures

1. Anniston Chemical Activity Emergency Operations Center Reporting Decision Matrix

2. Umatilla Chemical Agent Disposal Facility (UMCDF) Notification Procedures

Anniston Chemical Activity
Emergency Operations Center
Reporting Decision Matrix
10 JUNE 2010

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
1	MINICAM Readings Igloo Apron **Code 10-80**	Unconfirmed Reading outside engineering controls.	Notification Listing # **2 & 3**	YES (30 mins) **Level I** Updates Termination	YES	NO	YES	YES (6 hours) **(CAT I)** Supplemental Final Report
2	MINICAM Readings Igloo Apron **Code 10-80**	Confirmed Reading outside engineering controls.	Notification Listing # **2, 3 & 5**	YES (5 mins) **Level II** Updates/ Termination	YES	YES	YES	Yes (6 hours) (CAT II) Supplemental Final Report
3	ACAMS Stack Readings	ACAMS Alarm at or above (1 ASC) Unconfirmed	Notification Listing # **1, 3 & 5**	YES (30 mins) **Level I** Updates Termination	YES	NO	YES	YES (6 hours) **(CAT II)** Supplemental Final Report
4	ACAMS Stack Reading	Outside Engineering Controls Confirmed Readings (DAAMS Analysis) (Above 1 ASC)	Notification Listing # **1, 3 & 5**	YES (5 mins) **Level II** Updates Termination	YES	YES	YES	YES (6 hours) **(CAT II)** Supplemental Final Report

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
5	ACAMS Category C Areas	ACAMS Alarm at or above 1 STEL Unconfirmed (CSEPP MOA)	Notification Listing #1 **(Email Only)**	NO	Heads-up call Closure (Confirmed Negative)	NO	NO	NO CER ORI (Confirmed Positive)
6	ACAMS Alarm Container Handling Building (CHB) Areas	ACAMS Alarm at or above 1 STEL Unconfirmed (CSEPP MOA)	Notification Listing #1	NO	Heads-up call Closure Call	NO	NO	NO
7	ACAMS Alarm Container Handling Building (CHB) Areas	Confirmed Readings At or above 1 STEL (DAAMS Analysis)	Notification Listing #1 3 & **5**	YES (30 mins) **Level I** Updates Termination	YES	YES	YES	YES (6 hours) **(CAT I)** Supplemental Final Report
8	DAAMS Category D Areas (Lunch Room, DAS, Treaty Office)	Confirmed Readings At or above 1 STEL (DAAMS Analysis)	Notification Listing #1 3 & **5**	YES (30 mins) **Level I** Updates Termination	YES	NO	YES	YES (6 hours) **(CAT I)** Supplemental Final Report
9	Igloo- Munitions Atmospheric Reading (Unfiltered Igloo)	MINICAMS Alarm Unconfirmed Greater than 0.25 STEL	Notification Listing # **2**	NO	Heads-up call Closure Call (Confirmed Negative)	NO	NO	NO
10	Igloo - Munitions Atmospheric Reading (Unfiltered Igloo)	Confirmed Greater than 0.25 STEL (DAAMS Analysis) (Filters are placed on igloo)	Notification Listing #1 & 3	YES (30 mins) **Level I** Termination	YES	NO	YES	YES (6 hours) **(CAT I)** Supplemental Final Report

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
11	Igloo- Hazardous Waste Atmospheric Reading	Unconfirmed Greater than 0.25 STL	Notification Listing #2	NO	NO	NO	NO	NO
12	Hot EONC	Confirmed Reading	Notification Listing #1 (Email Only)	NO	NO	NO	NO	NO
13	Perimeter Monitoring Readings	"A" Tube shows indication of chemical agent, waiting for confirmation on "B" Tube	Notification Listing #1	NO	NO	NO	NO	NO
14	Perimeter Monitoring Readings	Confirmed Reading ≥ 1GPL	Notification Listing #1 & 5	YES (30 mins) **Level I** Updates Termination	YES	NO	YES	YES (6 hours) **(CAT I)** Supplemental Final Report
15	Report of Yellow Rabbit (Dead or Sick Animal)	Reported to EOC	Notification Listing #4	NO	NO	NO	NO	NO
16	Potential Personnel Exposure (Self Reporting)	Unconfirmed Clinic Evaluation	Notification Listing #2 & 3	NO	NO	NO	YES	YES (6 hours) **(CAT I)** Supplemental Final Report

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
17	Ambulance Runs	CMA guidance	Notification Listing # 2	NO	NO	NO	NO	ORI Report Only
18	Potential Personnel Exposure	Precautionary Medical Evaluation	Notification Listing #2	NO	NO	NO	NO	NO
19	Personnel Exposure	Confirmed Clinic Evaluation	Notification Listing #2, #3 & 5	Yes (30 mins) **Level I** Termination	YES	NO	YES	Yes (6 hours) **(CAT II)** Supplemental Final Report
20	Industrial Fatality (Non-chemical operation)	Confirmed	Notification Listing #2, 3 & 8	ANCA Commander's Decision	ANCA Commander's Decision	NO	NO	ANCA Commander's Decision
21	Industrial Fatality (Chemical Operation)	Confirmed	Notification Listing #2, 3, 5 & 8	YES (30 mins) **Level 0** Termination	NO	NO	YES	YES (6 hours) **(CAT III)** Supplemental Final Report
22	Industrial Injury/Illness (Non-Chemical Related) (On or Off Duty)	Confirmed	Notification Listing #2 & 8	NO	NO	NO	NO	NO

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
23	Industrial Injury/Illness (Chemical Related)	Confirmed	Notification Listing # 2, 3 & 8	YES (30 mins) **Level 1** Termination	YES	NO	YES	YES (6 hours) **(CAT I)** Supplemental Final Report
24	Site Masking (ANCDF or Storage)	EOC provide this verbiage on CSEPP Hotline: **"Personnel masked as a precautionary measure"**	Notification Listing # 2	NO	Heads-up Call Closure Call	NO	NO	NO
25	Death of Employee Deployed in Combat Zone	Confirmed	Notification Listing #1 & 8	NO	NO	NO	NO	NO
26	Hospitalization of Employee Immediate Family Member	Confirmed	Notification Listing #1	NO	NO	NO	NO	NO
27	Arrest of Any Employee	Confirmed	Notification Listing #6	NO	NO	NO	NO	NO
28	Loss, theft or compromise of Personally Identifiable Information (PII)	Confirmed	Notification Listing #6	NO	NO	NO	NO	NO
29	Any employee death or injury requiring immediate hospitalization.	Confirmed	Notification Listing #5 & 8	NO	NO	NO	NO	NO

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Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
30	Missing Chemical Agent	Confirmed	Notification Listing #2, 3, 5 & 7	ANCA Commander's Decision	ANCA Commander's Decision	NO	YES	Yes (6 hours) **(CAT III)** Supplemental Final Report
31	Criminal/Terrorist Threat	Unconfirmed	Notification Listing #2, 5 & 7	NO	NO	NO	YES	YES (6 hours) **(CAT II)** Supplemental Final Report
32	Criminal/Terrorist Action	Confirmed	Notification Listing #2, 5 & 7	ANCA Commander's Decision	ANCA Commander's Decision	ANCA Commander's Decision	YES	YES (6 hours) **(CAT III)** Supplemental Final Report
33	Explosions (Chemical Weapons)	Confirmed	Notification Listing #2 & 3	YES (5 mins) **Level TBD** Updates Termination	YES	YES	YES	YES (6 hours) **(CAT III)** Supplemental Final Report
34	Total Failure of HVAC (ANCDF)	Confirmed	Notification Listing #1	ANCA Commander's Decision	ANCA Commander's Decision	ANCA Commander's Decision	NO	ANCA Commander's Decision
35	Spill of Hazardous Materiel or Waste Outside Engineering Control	Confirmed (Incident Report Only)	Notification ORI email	YES (30 mins) **Level 0** Termination	YES	NO	NO	ORI Final ORI

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
36	Unplanned Plant Outage (ANCDF) and Restart of Operations After Outage	Determined that operational status cannot be regained within 24 hours.	Notification Listing #1	NO	Heads-up Call Closure Call	NO	NO	ORI Final ORI
37	Loss of Power with Back-up Generator Required	Confirmed	Notification Listing #1	NO	NO	NO	NO	NO
38	Brush Fires	CSEPP MOA	Notification Listing #2	NO	Heads-up call Closure Call	NO	NO	NO
39	Fire at ANCDF (Not Chemical Related)	ANCDF Notification	Notification Listing #1	NO	Heads-up Call Closure Call	NO	YES	ORI Final ORI
40	Internet, Phone (Land Line) Loss for 4 hours or more	Confirmed	Notification Listing #1	NO	Yes radio or cell phone	NO	Yes cell phone (if operational)	NO
41	Natural Disaster or Other Event That Impacts Work Plan for > 24 hours.	Confirmed	Notification Listing #1	NO	YES	NO	YES	ORI Final ORI
42	Negative Media Coverage or Inquiry Requiring Response	Confirmed	Notification Listing #1	NO	NO	NO	NO	NO

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

#	Scenarios	Action Levels	Army Notification	Off Post Notification Form	CSEPP Hotline	WebPuff Broadcast	CMA/ AOCHeads Up	CER Required (AR 50-6)
43	Elevated Depot Force Protection Condition (FPCON)	Confirmed	Notification Listing #5	NO	NO	NO	NO	NO
44	Category I Serious Incident Report (SIR) (Reference: AR 190-45)	Confirmed/Provided by DES	Notification Listing #5	NO	NO	NO	NO	NO
45	Spill of dilute agent standard – personal exposure	Confirmed	Notification Listing #2	NO	NO	NO	YES	ORI FINAL ORI

Note # 1: Notify (Telephonic) ANCA Commander, ANCA CEA, Site Project Manager, Chief RMD.
Note # 2: Notify (Telephonic) ANCA Commander, ANCA CEA, Chief, RMD, Site Project Manager, ANCDF Control Room.
Note # 3: Notify (Email) ANCA-Command Staff, Chief, RMD, ANAD-CO, DES, Clinic, CMOD, CSEPP PAO, Demil PAO, CMA-OC, TACOM-OC, AMC-OC, Army-OC.
Note # 4: Notify (Telephonic) Surveillance Br Chief, Toxic Lab Chief, ANCA Command Staff, Chief, RMD, ANCA Safety Manager, DES-Desk Operations Officer, ANCA PAO.
Note # 5: Wake up call to ANCA Commander and ANCA CEA Immediately, Chief, RMD.
Note # 6: Email Only to ANCA Commander and ANCA CEA.
Note #7: Before Public Affairs releases any information approval from HQDA, OPMG must be received.
Note #8: Notify (Telephonic) ANCA Casualty Management Officer (Lisa Waschko)

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DEPARTMENT OF THE ARMY
US ARMY CHEMICAL MATERIALS AGENCY
UMATILLA CHEMICAL DEPOT
78798 ORDNANCE ROAD
BUILDING 1
HERMISTON, OREGON 97838-9108

REPLY TO
ATTENTION OF

16 NOV 2010

Policy Statement
PS-RD-323

UMATILLA CHEMICAL AGENT DISPOSAL FACILITY (UMCDF) NOTIFICATION PROCEDURES

1. **PURPOSE.** To establish policy regarding notification procedures from the UMCDF Control Room (CON) to the Umatilla Chemical Depot (UMCD) Operations Center (OC).

2. **SCOPE.** This policy applies to all employees of the UMCDF and its subcontractors, including Washington Demilitarization Company (WDC) and Southwest Research Institute (SwRI).

3. **REFERENCES.**

a. Army Regulation 50-6, Chemical Surety.

b. DA Pamphlet 50-6, Chemical Accident or Incident Response and Assistance (CAIRA) Operations.

c. UMCD Chemical Accident / Incident Response and Assistance (CAIRA) Plan.

d. Army Regulation 190-59, Chemical Agent Security Program.

e. DA Pamphlet 385-61, Toxic Chemical Agent Safety Standards.

4. **POLICY.** The Commander, UMCD, is responsible to ensure that all organizations on the Installation meet safety, chemical surety, environmental and security regulations and procedures. The Commander will perform all necessary oversight functions to ensure compliance with all applicable Army, Department of Defense, Occupational Safety and Health Administration, and Federal, State and local environmental requirements. The Commander has responsibility for the security of all chemical agents on the Installation, regardless of location, in accordance with AR 190-59, para 15-1(d). In the absence of the Commander, i.e. duty status, OC operators may act on behalf of the Commander.

a. **UMCD will:**

(1) Maintain overall command and control of an accident or incident as the initial response force Commander, UMCD on-scene coordinator, and direct all Installation resources for all chemical event emergencies / incidents in accordance with (IAW) AR 50-6 and DA PAM 50-6.

(2) Provide support and services as required to implement, train, and exercise Chemical Stockpile Emergency Preparedness Program (CSEPP) activities IAW the UMCD CAIRA Plan.

(3) Through the OC, notify all CSEPP jurisdictions within 10 minutes of initial detection by UMCDF of a chemical accident or incident.

(4) Through the OC to the UMCDF CON, notify UMCDF of any incident that may pose (or appear to pose) a threat to the on-Depot and off-Depot communities that results in transport off-Depot for medical evaluation, treatment or hospitalization, or that may reasonably be expected to receive media or public attention.

(5) Through the OC, initiate prompt notification to UMCD Security to support emergency entry and egress to the chemical limited areas (CLA) and Installation.

(6) Through the OC, provide initial daily notification of planned or on-going UMCD operations and periodic updates throughout the workday.

(7) Through the OC to the UMCDF CON, notify UMCDF of any interruptions to the movement of toxic chemical munitions to the UMCDF, or loss of capability to perform critical OC functions (i.e., offsite notification, hazard prediction / plume modeling and emergency response coordination).

(8) Through the OC to the UMCDF CON, notify UMCDF of any interruptions or loss of capability to the CSEPP Alert and Notification System (ANS) pertaining to CSEPP emergency sirens, Tone Alert Radios (TARs), or variable message highway reader boards.

b. **UMCDF will:**

(1) Through the CON, notify the UMCD OC of a transport of hazardous materials off-post, ongoing chemical agent operations, and transfer of 1X waste.

(2) Through the CON, provide emergency notification to the UMCD OC regarding any serious accident or incident, whether it is chemical agent or non-chemical agent related, that results in a lost time injury or requires immediate off-post transport to a medical facility for medical evaluation, treatment, or hospitalization. Notifications will be made through the use of the UMCD / UMCDF hotline located in the CON.

(3) In general UMCDF will through the CON, notify the UMCD OC of any unexpected occurrences or activity (without release of chemical agent to the atmosphere) that may pose (or appear to pose) a threat to the on-post or off-post communities. This includes, but is not limited to, bomb threats, loss of primary or emergency power, loss of plant ventilation system, or building / site evacuations.

(4) Through the CON, notify the OC of any other occurrences or activity, which has the potential for negative reactions by the news media, State, or local officials toward chemical agent operations at UMCD.

(5) Through the CON, immediately notify the UMCD OC when agent alarms sound or agent monitoring indicates a possible problem. The UMCDF will confirm results, positive or negative, with the OC as soon as they are verified. Required notifications include any of the following:

(a) Any liquid agent spill outside of Category A or B areas.

(b) Any liquid agent spill within Category A or B areas not normally expected during operations or maintenance activities.

(c) Total loss or significant degradation of the plant ventilation system.

(d) Loss of a main power feeder.

(e) Any detected agent release in a ventilated area that would constitute a chemical event under existing Army Regulations. Confirmation of the initial alarm or analysis will be performed within four hours.

(f) Any stack alarm that will require plant workers to don their protective masks and / or take other protective actions.

(g) Unexpected chemical surety related occurrences reported to State or local jurisdictions (i.e., Department of Environmental Quality notifications) as provided in local agreements but not mandated by law.

(h) Workers reporting that they were exposed to chemical agent, regardless of whether the postulated exposure is confirmed by clinical or laboratory evaluation.

(i) Confirmed detection of chemical agent exceeding the established airborne exposure limits cited in AR 385-61, outside of Category A or B areas but within Category C areas.

(j) Confirmed presence of liquid agent outside munitions, bulk containers, or over-pack containers where not expected.

(k) Personnel exhibiting signs or symptoms associated with chemical agent exposure.

(l) Any criminal act directed towards the laboratory or demilitarization facilities or any deliberate release of chemical agent.

(m) Any explosion or fire, whether or not chemical agents are involved.

(n) Actual theft of chemical agent material.

(o) Any release of chemical agent into the atmosphere.

(p) Confirmed agent readings in Category C, D, or E areas.

(6) Through the CON, any unannounced release of the UMCDF workforce. For example, union / workforce walkout, industrial accident, etc.

(7) Through the CON, make daily notification to the UMCD OC of the senior manager present for each of the UMCDF organizations (Program Manager for Chemical Stockpile Elimination, WDC and SwRI) for a 24-hour period.

(8) UMCDF will provide an emergency "call down" list to the UMCD OC with updates as required.

(9) Through the CON, provide a minimum of 48 hours advance notice for any munitions being returned from the UMCDF to the chemical storage area.

(10) UMCDF will provide a schedule of operations to include planned UMCDF operational shutdowns.

(11) Through the CON, provide prior notification of the start of and unscheduled shutdowns of agent operations to the UMCD OC.

(12) Through the Emergency Preparedness or Emergency Response Manager, notify the UMCD OC in advance of any independent CAIRA exercises and other drills or integrated exercises conducted at the UMCDF.

(13) Through the CON, inform the UMCD OC of any acts of violence in the workplace.

5. This policy supersedes the policy statement PS-RD-323 dated 11 August 2009.

KRIS N. PERKINS
LTC, CM
Commanding

DISTRIBUTION:
A

Appendix E: Calhoun County Commissioner Resolution and Pink Zone Memorandum of Agreement

RESOLUTION
OF THE
CALHOUN COUNTY COMMISSION

WHEREAS, Calhoun County has citizens living in close proximity (herein referred to as "pink zones") to the Anniston Chemical Activity (ANCA) and the Anniston Chemical Agent Disposal Facility (ANCDF) located on Anniston Army Depot (ANAD), and such citizens have a limited time within which to respond in the event of a chemical accident or incident (CAI); and

WHEREAS, the sooner citizens in the pink zones receive alert and notification, their ability to take protective actions is increased; and

WHEREAS, the Calhoun County Emergency Management Agency (County EMA) has taken all reasonable measures to expedite its portions of the alert and notification process, and direct activation by the Army is necessary to provide additional protection of citizens at risk in the pink zones.

NOW, THEREFORE, BE IT RESOLVED by the Calhoun County Commission that the Calhoun County Commission, and Calhoun County, Alabama, request that the U.S. Army provide, if there is a community level CAI with the storage and/or destruction of chemical weapons at ANAD, the initial activation of the alert and notification systems (sirens, tone alert radios and emergency alert system) in the pink zones or parts thereof, if and as agreed to be necessary and appropriate by the U.S. Army and County.

I, Kenneth L. Joiner, Administrator/Treasurer of Calhoun County, Alabama, hereby certify that the above and forgoing is a true and correct copy of a resolution adopted by the Calhoun County Commission at its regular meeting on Thursday, March 13, 2003.

Done this the _____day of _____, 2003.

(SEAL)

_____
Kenneth L. Joiner
Administrator/Treasurer

Memorandum Of Understanding Among Calhoun County,
Anniston Army Depot and Anniston Chemical Activity
For Initial Activation of Alert and Notification System
For Pink Zones during a Chemical Accident or Incident

I. PURPOSE

This Memorandum of Understanding (MOU), by and among Calhoun County, Anniston Army Depot (ANAD), and Anniston Chemical Activity (ANCA) addresses the need for close cooperation among these parties to ensure that citizens living in close proximity (herein referred to as "Pink Zones") to the chemical agent storage areas and the disposal facility located on ANAD receive timely alert and notification. Such pink zones citizens have limited time within which to respond in the event of a chemical accident or incident (CAI). To that end, this understanding establishes when and how the ANAD/ANCA will provide initial alert and notification to the pink zones of a CAI and appropriate initial protective action.

II. REFERENCES

A. Calhoun County Commission Resolution dated March 13, 2003
B. Department of the Army Regulation 50-6, Chemical Surety, June 26, 2001
C. Department of the Army Memorandum For Commander, U.S. Army Material Command dated June 22, 1994, subject: Chemical Stockpile Emergency Preparedness Program (CSEPP) Public Alert and Notification Policy

III. DEFINITIONS

A. Alert and Notification System (A&N): For the purposes of this agreement the A&N refers only to the sirens, Tone Alert Radio (TARS) and Emergency Alert System (EAS).
B. Chemical Accident/Incident (CAI): A chemical accident is an event involving non-deliberate actual or potential release of chemical agent, where safety is of primary concern. A chemical incident is an event involving deliberate actual or attempted release of chemical agent (terrorism or criminal acts), where security is also of concern.
C. Community Emergency: The chemical event emergency notification level declared by the Army when events are likely to occur or have occurred that involve agent release with chemical effects beyond the installation boundary. This level will be declared when the predicted chemical agent mutually agreed to dosage of interest distance extends beyond the installation boundary.
D. Pink Zones: Emergency planning zones located within the IRZ and in proximity to the boundaries of ANAD and Pelham Range, which are zones A-1A, A-1, A-2, B-1, B-2, C-1, C-1A, and D-1.
E. Pre-coordinated Protective Action Recommendation (PAR) and Protective Action Decision (PAD): The mutually agreed to Protective Action Recommendation by the Army and Protective Action Decision by the County for all pink zones is shelter in place for purposes of initial activation of the A&N system by the Army pursuant to this agreement.

IV. PROCEDURES

A. Army Responsibilities:
1. In the event of a community level emergency the Army will initiate the following actions:
a. Verify whether the pre-coordinated PAR is appropriate for the event.
b. If the pre-coordinated PAR is not appropriate, the Army will not initiate alert and notification and will consult with the County EMA.
c. If the pre-coordinated PAR is correct, the Army shall proceed with the following:
i. Make a "heads-up" phone call on the CSEPP hotline immediately prior to activation.

ii. Perform initial activation of the sirens, TARS, and EAS, in that order, for the Pink Zones in accordance with the pre-coordinated PAD.

2. Inform the County EMA if the Army equipment is not functional.
3. Perform system tests if requested by the County EMA.

B. Calhoun County Responsibilities:

1. Provide the Army with the pre-scripted messages for the A&N system.
2. In the event of a community level emergency, the County will initiate the following actions:
   a. Activate the A&N system for the remaining impacted IRZ and PAZ zones in Calhoun County.
   b. Activate the A&N system in the Pink Zones after the initial activation.
   c. Activate the A&N system in the event that the Army equipment is not functional.
   d. Activate the A&N system in the event that the pre-coordinated PAD is not appropriate.
3. Assist the Army in determining the equipment and training necessary to allow the Army to initiate the County's A&N system for the pink zones.
4. Grant the Army electronic access to siren test results.

C. Joint Responsibilities:

1. Participate in training on the equipment and procedures.
2. The parties shall determine the time and date the Army shall commence providing initial activation of the A&N system in the pink zones, immediately after the later of the following:
   a. Depot equipment being installed and operational to the satisfaction of the Army;
   b. The receipt of protective equipment (respiratory protection devices, portable room air cleaners and shelter in place kits) by pink zone residents to the degree determined by the County;
   c. The informing of the surrounding Counties, through the IPT process, of the change to pink zone activation procedure; and
   d. A validation exercise that is successful to the satisfaction of the County and the Army, and documented by all parties.

V. TERMS AND TERMINATION

This agreement will take effect and be implemented upon the date of the last signature, and will remain in effect until terminated, as herein provided, by any of the parties. All parties agree that this agreement contains the full agreement between the parties and supersedes all previous communications, either oral or written, pertaining to initial activation of A&N system for the pink zones during a community level chemical emergency.

If any provision or provisions of this agreement are held to be invalid, illegal or unenforceable, the remaining provisions will not in any way be affected and the remaining provisions of this agreement will still be in effect.

All parties agree to review this agreement at least annually and evidence the same as appropriate. This agreement may be amended only by a written agreement executed by each of the parties hereto. Notices shall be deemed received upon receipt. This agreement may be terminated by any party upon sixty days written notice to the other parties. Any such notice shall be provided to the following addresses:

ANAD
Commander
Anniston Army Depot
7 Frankford Avenue
Anniston, AL 36201-4199

ANCA:
Commander

Calhoun County:
Calhoun County Administrator
Calhoun County Commission
1702 Noble Street, Suite 103
Anniston, AL 36201

Calhoun County EMA
Director of Calhoun County EMA

Anniston Chemical Activity
7 Frankford Avenue
Anniston, AL 36201-4199

507 Francis Street, West
Jacksonville, AL 36265

IN WITNESS WHEREOF, County, Anniston Army Depot and Anniston Chemical Activity have caused this Memorandum of Understanding to be executed in their respective names, have caused their respective seals to be hereunto affixed, have caused this agreement to be attested, all by their duly authorized officers, and caused this agreement to be dated as of the date of the last signature.

ATTEST:

Kenneth L. Joiner
Its: Administrator

(SEAL)

Calhoun County, Alabama

By: _____
James A. Dunn,
as Chairman of the
Calhoun County Commission

Anniston Army Depot

By: _____
COL Gerald Bates, Jr.
Commander,
Anniston Army Depot

Anniston Chemical Activity

By: _____
LTC Robert E. Jones, Jr.
Commander,
Anniston Chemical Activity

STATE OF ALABAMA)
)
CALHOUN COUNTY)

I, the undersigned, a Notary Public in and for said State and County, hereby certify that James A. Dunn, as Chairman of the Calhoun County Commission, COL Gerald Bates, Jr., and LTC Robert E. Jones, Jr., whose names are signed to the foregoing agreement and who are known to me, acknowledged before me on this day that, being informed of the contents of the agreement, they with full authority, executed the same voluntarily for and on behalf of their respective organizations.

Given under my hand and seal on this the 6th day of March, 2003.

Notary Public: _____
My commission expires: 2/21/2005

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Appendix F: Pine Bluff Coordination Documents

1. Procedure for Formally Documenting PBA/PBCDF/PBCA Coordination of Interface Requirements Documents

2. Pine Bluff Chemical Activity Policy Statement 38, Coordination of Interface Requirements Documents

3. Interface Coodination Form

4. Reviwer Comment Form

5. Coordination Flow Diagram

DEPARTMENT OF THE ARMY
US ARMY CHEMICAL MATERIALS AGENCY
PINE BLUFF CHEMICAL ACTIVITY
51-420 504TH
PINE BLUFF, ARKANSAS 71602-9500

REPLY TO
ATTENTION OF

AMSCM-OPA-CA

4 October 2005

MEMORANDUM FOR See Distribution

SUBJECT: Procedure for Formally Documenting PBA/PBCDF/PBCA Coordination of Interface Requirements Documents

1. Reference memorandum from AMCOPS-SSO to AMSCM-OPPB-CO, AMSCM-OPPA-CO, and AMSCM-ECC-P; subject: HQ Army Materiel Command MEGA Team Visit dated 8 October 2004.

2. As a result of an AMC MEGA Team review of the PBCDF the reference Observation Number MISC001 was generated and recommended the following:

a. Coordinate all WDC emergency response documents addressing responsibilities of PBA and PBCA with respective activities. Additionally, require signatures acknowledging concurrence with the document.

b. Develop a process that ensures updates and new documents go through the same signature process acknowledging concurrence with the document.

3. Messrs. Lloyd Barber, John Trosper, Tony Poole and Tom Reinhardt met 15 Oct 2004 to develop a concept for meeting the MEGA Team's recommendation. The following is proposed for meeting the finding's recommendation:

a. For staffing draft documents the proceeding shall be followed:

(1) The proponent of a draft interface requirements document shall staff and track the document (with the attached Reviewer Comment Form) with all effected external organizations. The proponent shall be responsible for identifying potential external organizational sub-elements (directorates, offices, etc.) effected by their documentation and establishing a suspense for the review.

(2) The proponent shall be responsible for comment resolution.

b. For staffing final documents (that have completed the review cycle) the proceeding shall be followed:

(1) The proponent of an interface requirements document shall prepare an official memorandum for documenting coordination between the proponent and all effected external organizations. The memorandum shall contain a concurrence signature block

for the approval authorities of the effected organizations. The proponent shall be responsible for identifying potential external organizational sub-elements (directorates, offices, etc.) effected by their documentation and establishing a suspense.

(2) The attached Interorganizational Coordination Form shall be used to track the approval coordination effort with sub-elements within an organization. Organizational POCs/primary reviewers shall annotate with their initials the form indicating that the comment resolution is satisfactory. The form shall accompany the coordination memo and document through to approval by the appropriate approval authorities.

(3) The proponent shall assemble a packet for obtaining final approval that consists of the following:

(a) The requirement document.
(b) The completed review form.
(c) The approval memorandum.
(d) Interorganizational Coordination Form.

(4) Revisions to PBA/PBCDF/PBCA interface requirements documents that effect external organizational elements will be staffed by the proponent for coordination in accordance with 3.a. and 3.b. of this procedure.

(5) All approved coordination memos and respective coordination forms will be maintained by the proponent for the life of the PBCDF demil program.

4. The point of contact for this record is Mr. Tony E. Poole, extension 2421.

CASEY P. SCOTT
LTC, CM
Commanding
Pine Bluff Chemical Activity

Concur:
BRIAN S. LINDAMOOD
COL, CM
Commanding
Pine Bluff Arsenal

Concur:
RANDY W. LONG
Site Project Manager
Pine Bluff Chemical Agent
Disposal Facility

Distribution:
AMSCM-OPB-CO
AMSCM-ECC-P

DEPARTMENT OF THE ARMY
PINE BLUFF CHEMICAL ACTIVITY
PINE BLUFF, ARKANSAS 71602-9500

REPLY TO
ATTENTION OF

CMPB-CA

3 August 2009

MEMORANDUM FOR See Distribution

SUBJECT: Pine Bluff Chemical Activity Policy Statement 38, Coordination of Interface Requirement Documents

1. PURPOSE. To provide formal coordination of PBA, PBCDF, and PBCA interface requirements.

2. SCOPE. This policy applies to all organizational elements of PBA, the PBCDF, and PBCA. Interface requirements documents are those that define the mutual expectations and/or agreements between two or more of these organizations interacting to achieve their respective mission.

3. POLICY. The proponent shall staff draft interface requirement documents in accordance with the following:

a. The proponent shall staff for review and track requirement documents (using the attached Reviewer Comment Form) with all affected external organizations. The proponent shall be responsible for identifying all external organizational sub-elements (directorates, offices, etc.) that are impacted by their requirement document and establishing a review suspense date.

b. The proponent shall be responsible for comment resolution.

4. The proponent shall staff final requirement documents (those that have completed the review cycle of 3. above) in accordance with the following:

a. The proponent shall prepare a memorandum for proponent approval authority signature and concurrence signature blocks for the affected external approval authorities.

b. All personnel involved in the draft review cycle shall annotate (with their initials) the attached Interface Coordination (IC) Form indicating that the comment resolution is satisfactory. The IC Form shall accompany the documentation packet (see 4.c.) through to acceptance by all approval authorities. The IC Form will serve to indicate to all approval authorities that the requirement document has been staffed within their organization.

CMPB-CA
SUBJECT: Pine Bluff Chemical Activity Policy Statement 38, Coordination of Interface Requirement Documents

c. The proponent shall assemble a packet for the final approval process that consists of the following:

1. The Approval Memorandum (see 4.a.)
2. The Requirement Document
3. The completed Reviewer Comment Form
4. Interface Coordination Form (see 4.b.)

d. Revisions or changes to previously approved interface requirement documents will be staffed in accordance with this policy. Minor editorial changes (i.e., spelling, page numbering, etc.) or wording changes (for clarification) that do not affect the intent of the document will not require re-staffing.

e. All signed approval memos and respective IC Forms will be maintained by the proponent for the life of the PBCDF program.

5. The point of contact for this policy is Mr. Tony E. Poole, extension 2421.

NATHANIEL W. FARMER
LTC, CM
Commanding

Concur:
FRANZ J. AMANN
COL, CM
Commanding
Pine Bluff Arsenal

Concur:
MARK A. GREER
Site Project Manager
Pine Bluff Chemical Agent
Disposal Facility

Distribution:
SJMPB-CO
AMSCM-SEP

INTERFACE COORDINATION FORM

(See instructions on reverse)

Summary of Action	Date:
SUBJECT:	SITE TEAM:
	SUSPENSE Date:

References/Background & Discussion/Recommendation: (Required for all correspondence)

PBCDF SITE OFFICE COORDINATION

Office Symbol	POC	Initials	Date	Office Symbol	POC	Initials	Date

PBA OFFICE COORDINATION

Office Symbol	POC	Initials	Date	Office Symbol	POC	Initials	Date

PBCA OFFICE COORDINATION

Office Symbol	POC	Initials	Date	Office Symbol	POC	Initials	Date

Action Officer (Name, Telephone Ext & Signature)

PBCA FORM 50-45-R-E, Jun 2008 Previous Editions Are Obsolete PBCA Command Policy #38

Reviewer Comment Form

(See instructions on reverse)

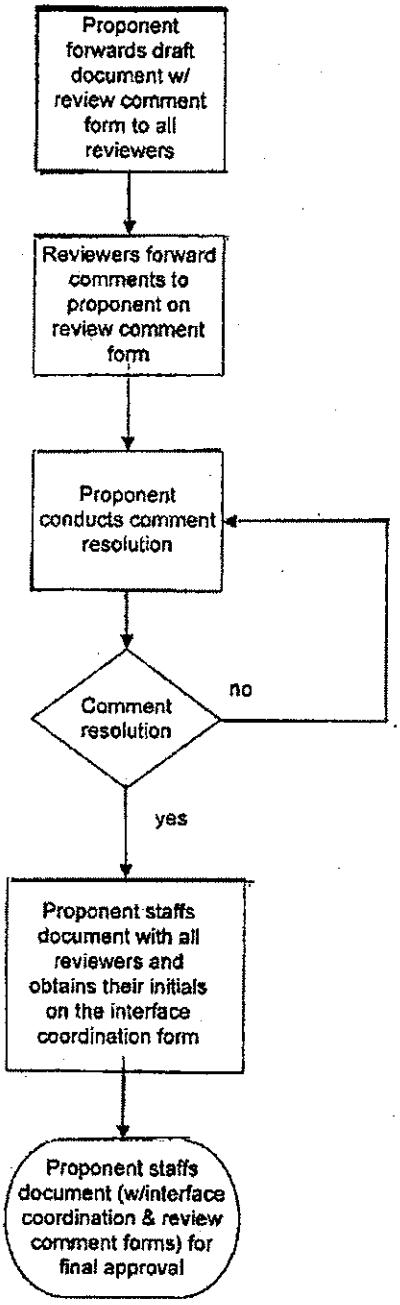
Document: | Date:

Reviewer:

ITEM	REFERENCE	MANDATORY	COMMENT	RESOLUTION
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

PBCA FORM 50-46-R-E, JUN 2008 Previous Editions Are Obsolete PBCA Command Policy #38

Coordination Flow Diagram



Appendix G: Treaty Notification Message

Notification Text Notification Text

DATE: 29 JUN 10
TO: Inspection Team Leader at ANCDF
FROM: Anniston CW Storage Facility

PRECEDENCE: PRIORITY
CWC MESSAGE: CWC/ANCA/10180/068

1. SUBJECT: Departure of shipments of chemical weapons from Anniston CW Storage Facility to Anniston Chemical Demil Facility

2. RELATED MESSAGES:

3. SHIPMENT INFORMATION:
Departure point: Anniston CW Storage Facility
Date and Estimated Time of Departure: 30 June 10 / 0730
Destination Facility: Anniston Chemical Demil Facility
Date and Estimated Time of Arrival: 30 June 10 / 0800
Common Name of Chemical: HT
Category: 1
Type: HT Cartridge M2 4.2in
Method of Transportation: Motor Vehicle

4. SHIPMENTS:

a. Control Number: W901A8-10181-1001
Quantity: 96
NO TAGGED ROUNDS

b. Control Number: W901A8-10181-1002
Quantity: 96
NO TAGGED ROUNDS

c. Control Number: W901A8-10181-1003
Quantity: 96
NO TAGGED ROUNDS

d. Control Number: W901A8-10181-1004
Quantity: 96
NO TAGGED ROUNDS

e. Control Number: W901A8-10181-1005

Quantity: 1
TAGGED ROUND
TREATY TAG# 163665

Control Number: W901A8-10181-1006
Quantity: 1
TAGGED ROUND
TREATY TAG# 163664

Control Number: W901A8-10181-1007
Quantity: 94
NO TAGGED ROUNDS

f. Control Number: W901A8-10181-1008
Quantity: 96
NO TAGGED ROUNDS

g. Control Number: W901A8-10181-1009
Quantity: 96
NO TAGGED ROUNDS

h. Control Number: W901A8-10181-1010
Quantity: 96
NO TAGGED ROUNDS

i. Control Number: W901A8-10181-1011
Quantity: 96
NO TAGGED ROUNDS

j. Control Number: W901A8-10181-1012
Quantity: 96
NO TAGGED ROUNDS

k. Control Number: W901A8-10181-1013
Quantity: 96
NO TAGGED ROUNDS

l. Control Number: W901A8-10181-1014
Quantity: 96
NO TAGGED ROUNDS

m. Control Number: W901A8-10181-1015
Quantity: 96
NO TAGGED ROUNDS

n. Control Number: W901A8-10181-1016
Quantity: 96
NO TAGGED ROUNDS

o. Control Number: W901A8-10181-1017
Quantity: 96
NO TAGGED ROUNDS

5. REMARKS:

END OF CWC MESSAGE: CWC/ANCA/10180/068

Appendix H: UMCD Munitions Hazardous Waste Tracking Form

MUNITIONS HAZARDOUS WASTE TRACKING FORM

A. COMPLETED BY UMCD K-BLOCK OPERATORS

1. Munitions Description:

2. EPA/DEQ Waste Codes: ☐ Explosive Munitions D002-D011, D022, D028, D030, D043, P999 ☐ Non-Explosive Munitions D002-D011, D022, D028, D043, P999

3. Physical State: ☐ Liquid ☐ Solid | Weather conditions during loading: ☐ Rain ☐ Snow ☐ Fog ☐ Clear

4. Date Removed from Storage: ____/____/____ (MM DD YYYY) | Placards placed on EONC trailer ☐ Yes ☐ No

5. EONC/Shipping Container #: | EONC/Shipping Container contains Treaty items ☐ Yes ☐ No

6. Form 4508 Control #: | Total number of munitions in EONC:

Inventory Personnel Print Name _____ Signature _____ Date _____

EONC Leak Check: CHB-DETR-_____ ☐ N/A for Spray Tank Shipping Container

Calibration Due Date ____/____/____ (MM DD YYYY)

Results: 1 ☐ Pass ☐ Fail 2 ☐ Pass ☐ Fail 3 ☐ Pass ☐ Fail

RTAP Results: _____ ☐ Notified OC of test results ☐ N/A

Comments:

K-Block Personnel Print Name _____ Signature _____ Date _____

B. COMPLETED BY CHB OPERATORS

Date received in CHB (S01):

Did the munitions come from an igloo with a history of leaking munitions? ☐ Yes ☐ No

EONC Leak Check: (explain failure in Comments and request CON notify OPCW)
CHB-DETR-_____ CAL Due Date ____/____/____ (MM DD YYYY)
Results: 1 ☐ Pass ☐ Fail 2 ☐ Pass ☐ Fail 3 ☐ Pass ☐ Fail

Initial ACAMS Monitoring: Station #:_____
Date _____ Time _____ Reading _____

EONC/Shipping Container Leak Test and ACAMS Monitoring verified complete.

CHB Operator: _____ (signature/date)

Monitoring results every 7th day of EONC/Shipping Container storage. Initial and date each entry.

Days	7	14	21	28	35	42	49	56	63
Results									
Date/Time									
Initial									
ACAMS Station									

Comments:

C. COMPLETED BY UPA OPERATORS

1. Date received in UPA (S01):

2. EONC/Shipping Container Agent Monitoring Results:
ACAMS # _____ ACAMS results _____
NOTE > 40.0 VSL must transfer EONC to TMA

3. Opened: Date: Time:

4. Item Count Verification: (Check appropriate box) ☐ Accept ☐ Reject (explain in comments)

Comments:

UPA Personnel Print Name _____ Signature _____ Date _____

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Appendix I: Security Lessons Learned

x. Security. The following provisions of AR 190-11; 190-13 and 190-59 must be completed prior to certification and initiation of DEMIL operations:

(1) The physical security officer (PSO) has coordinated with the installation engineer personnel during planning, design and construction to identify physical security and anti-terrorism requirements and to ensure requirements were incorporated into the project and that reviews were conducted at all stages of development in accordance with AR 190-13, The Army Physical security Program, 30 Sep 93 paragraphs 1-25 i and j. The PSO must also ensure that all provisions of subparagraph (2) below have been incorporated and that inspections outlined in subparagraph (3) are conducted.

(2) The following provisions of AR 190-59 (Chemical Agent Security Program), 11 Sep 09, must be completed:

a. Chemical agents are protected against sabotage, theft, loss, seizure, or unauthorized access, use, or diversion while undergoing chemical DEMIL operations. This requirement will be satisfied with the completion of the chemical agent vulnerability assessment and its approval by HQAMC.

b. The storage commander has assumed overall responsibility for security of all chemical agents on the installation, to include chemical demilitarization operations and security forces meet the requirements of paragraphs 15-11 and chapter 9.

c. Movements of chemical agents from storage sites to chemical DEMIL processing facilities will be conducted in accordance with chapter 11 and appropriate plans and procedures are in place.

d. DEMIL processing facilities a properly located within chemical limited areas meeting chapter 4 requirements.

e. Exclusion areas are properly designated IAW paragraph 15-3 for chemical agents consistent with DEMIL processing operations.

f. Appropriate security measures are in place for temporary staging of chemical agents pending continuation of operations when processing of agent has stopped as required by paragraph 15-4.

g. DEMIL doors and windows meet requirements outlined in paragraph 15-5.

h. Locking systems; key and lock controls; and interior intrusion detection systems (IDS) meet the requirements of paragraphs 15-6 thru 15-8.

i. Security procedures for monitoring of IDS and closed circuit television (when required) and entry and exit controls meet the requirements of paragraphs 15-9 and 15-10.

j. The DEMIL physical security plan is properly completed in accordance with

paragraph 3-10.

k. Newly installed interior and exterior intrusion detection systems must meet the requirements of paragraph 5-7l.

(3) Conduct a physical security inspection prior to (when construction is completed but prior to occupancy by demilitarization personnel) and immediately after occupancy (when the facility is occupied by demilitarization personnel but prior to certification by AMC) in accordance with AR 190-11, Physical Security of Arms, Ammunition, and Explosives, 15 Nov 2006.

Appendix J: Extract from PBCDF MEGA Team Visit

MEGA Team Visit
Pine Bluff Chemical Demilitarization Facility
20 September– 8 October 2004

Observation Number: MISC001 **Reviewer's Name:** Kerry Powell

Functional Area

___ Mission Ops	__ Surety Mgmt	Safety
___ Medical	___ Security	___ Accident/Incident Response
X Other: Oversight/Coordination		

Finding Rating

Critical	X Major	___ Minor
Not Applicable	___ Attributed To:	PBCDF/PBA/PBCA

Observation(s): There is no evidence that all documentation addressing emergency response roles and responsibilities, requirements and expectations have been coordinated and concurred with by personnel and organizations (PBA and PBCA) having responsibilities with the particular document(s). Documents listed below are not all inclusive they are identified as examples only:
PB-PL-028 - Emergency Response Plan, Volume II
PB-PL-076 - PBCDF Drill and Exercise Plan
PB-PL-077 - PBCDF Emergency Response Organization
PB-EP-002- Emergency Preparedness Consolidated Contingency procedure
PB-EP-003 - Radiation Response Procedure
PB-EP-005 - PBCDF Personnel Protective Action
PB-EP-029 - Emergency Response Organization and Incident Command Structure
PB-OP-002 - Event Notification Procedure
PBCDF RCRA Contingency Plan
This issues is also applicable to other documents in the areas of security, environmental, maintenance etc.

Root Cause(s): No formal process for coordinating and receiving acknowledgement and concurrence on documentation as cited above.

Recommendation(s): Coordinate all WDC emergency response documents addressing responsibilities of PBA and PBCA with the respective activities. Additionally, require signatures acknowledging concurrence with the document. Develop a process that ensures updates and new documents go thorough the same signature process acknowledging concurrence with the document.

PBCDF, PBCA, and PBA appoint someone to be the liaison for all the coordination required for all documents in all areas, e.g., security, emergency response, environmental, etc. This person would be responsible to ensure that the documents are placed in the right hands for action and returned to the proponent in the required time.

Reference(s):

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Appendix K: Public Affairs

Start of Operations Activities Timeline

Outreach activities relating to this plan began in September 2003 and will continue to the day of start-up and into the weeks beyond.

120 days before start-up (16 Apr 04)

Activity	Deadline	Responsibility	Strategy/Status
Prepare start-up plan	15 Sep 03	URS Coleman	Draft outline completed 18 Aug 03; continue discussions on public meetings; media plan; press packet distribution; notification list; key messages
Conduct City, County, CAC, Legislative briefings and tours	Ongoing	Barclay, Hamrick, Binder	Provide start-up notifications in briefings conducted with Hermiston, Umatilla, Irigon city councils; West End Mayors' Association, Umatilla County Commission; Oregon CAC; Schedule for March and June
Distribute weekly "Progress Update" to media	Ongoing	Kelley, Binder	
Produce operations video		Kelley	Draft video delivered to Army PAO in Feb 04 Provide blank tapes for duplication
Produce color newspaper insert for three area newspapers		URS Coleman	Initial review of articles due 15 Apr 04 Complete production 11 Jun 04 Publish 30 Jun 04
Conduct stakeholder survey		URS Coleman	Use results to tailor outreach activities; Survey calls begin 26 Jan 04; CAC presentation on results 18 May 04
Plan stakeholder meetings	30 Mar 04	Binder, URS Coleman	Partner with CSEPP; Arrange meetings in Umatilla, Morrow and Benton counties for 22-24 June 04 from 4-7 p.m.
Produce stakeholder meeting posters	30 Mar 04	URS Coleman	Draft copy to URS Coleman on 2 posters; six more to follow
Develop "Start-up: What to Expect" presentation for newspaper staffs		Binder, Kelley, URS Coleman	URS to develop and schedule 20-minute presentation
Draft "Start-up: What to Expect" article in REACH	01 Sep 03	URS Coleman	REACH article published 1 Apr 04

Produce draft advertisements for public stakeholder meetings		URS Coleman	
Continue media, VIP tours at UMCDF	Ongoing	Binder, Kelley, URS Coleman	New reporters tour held 14 Aug 03; EO tour 2 Mar 04
Include start-up information in UMCDF daily and monthly newsletters	Ongoing	Kelley, WDC staff	
Hold strategy meeting with CSEPP public affairs group			Planning meetings held in Oct 03, Jan 04, and Mar 04 to coordinate activities and share key messages.
Hold strategy meeting with Oregon DEQ public affairs			Coordinate activities and share key messages with Shelley Ingram; schedule meeting for March 04
Participate in Oregon EQC public hearing on UMCDF start-up	20 May 04	Binder Kelley URS Coleman	Notified interested parties of EQC's Hermiston meeting
Produce Report Card mailer		URS Coleman	
Produce comment card		URS Coleman	First used during 22 June 04 and 24 June 04 information open houses

60 days before start-up (16 June 04)

Activity	Deadline	Responsibility	Strategy/Status
Distribute weekly "Progress Update"		WDC	Rick - need to finalize
Include start-up information in UMCDF daily and monthly newsletters	Ongoing	Kelley, WDC staff	
Complete operations video		WDC	Me w/ Cruickshank
Complete newspaper insert		URS Coleman	Sign off on final draft by 15 July 04
Conduct City, County, CAC briefings		Barclay, Hamrick, Binder	
KOHU radio presentations		WDC, ORO, UMCD	Six weekly radio interviews of project staff completed 7.1.04
Finalize 30-day notifications to Congress and OPCW		HQ staff; OCLL	Notifications signed 17 June 04 by Deputy Secretary of Defense
Complete posters for public meetings		URS Coleman	Completed 10 posters on 6.17.04
Publish advertisements for stakeholder meetings		URS Coleman	Published 6.19.04, 6.20.04, 6.22.04

Distribute news release for stakeholder meetings		URS Coleman	Distributed on 6.18.04
Conduct stakeholder meetings			Information open houses held 6.22.04 at Paterson and 6.24.04 at Hermiston CAC meeting; next meeting scheduled for 7.15.04 at Irrigon CAC.
Complete potential Q & As for start-up issues		URS Coleman	120
Hold "Start-up: What to Expect" briefings with editorial boards, news staffs		Binder, Kelley, URS Coleman	Tri-City Herald conducted 6.29.04
Hold weekly availability sessions with media in Outreach Office	20 Oct 03	Binder, Kelley, URS Coleman; technical staff as needed	Informal sessions held at 4 p.m. Mondays to address questions and concerns of media Start 2 Aug ?

30 days before start-up (16 July 04)

Activity	Deadline	Responsibility	Strategy/Status
Include start-up information in UMCDF daily and monthly newsletters	Ongoing	Kelley, WDC staff	
Hold weekly availability sessions with media in Outreach Office	20 Oct 03	Binder, Kelley, URS Coleman; technical staff as needed	Informal sessions held at 4 p.m. Mondays to address questions and concerns of media
Request CSEPP to fully stock ORO with shelter kits and CSEPP materials		URS Coleman	
Distribute weekly "Progress Update"		WDC	Include milestone activities such as DEQ approval, Army approval, notification to Congress
Meeting with legislators, governor in Salem		WDC	
Conduct City, County, CAC, Confederated Tribes briefings	Ongoing	Barclay, Hamrick, Binder	
Complete notification lists		URS Coleman	
Send "Dear Community Leader" letters			Inform "Oregon Contacts" list that start-up notice has been delivered to Congress
Distribute 30-day notification news release to media		Binder, URS Coleman	Decline to distribute news release that start-up notice was delivered to Congress on 18 June 04; included info in CAC briefing 24 June 04
Distribute expanded REACH newsletter describing all facets of UMCDF activities		URS Coleman	65,000 copies needed to insert into three local newspapers
Hold Media Day at UMCDF		Binder, Kelley, URS Coleman	

Finalize plan to supply video feed to Media Center (Treaty Building) of first rocket		Kelley	
Finalize security plan for day of start-up		Binder	
Assemble media packets		URS Coleman	Draft contents list: Staff bios, UMCDF "Progress Update," incineration fact sheet, UMCD fact sheet; CMA fact sheets
Request HQ assistance for start-up day			

7 days before start-up (9 Aug 04)

Activity	Deadline	Responsibility	Strategy/Status
Hold extended ORO hours		URS Coleman	Open ORO in evenings for one week prior to start-up; advertisement and news release needed Request CSEPP staff assistance in ORO in days before startup, if needed
Distribute weekly "Progress Update"		WDC	
Include start-up information in UMCDF daily and monthly newsletters		Kelley, WDC staff	

3 days before start-up (13 Aug 04)

Activity	Deadline	Responsibility	Strategy/Status
Begin heads-up notification calls		Barclay, WDC, URS Coleman	Begin process of internal notifications; complete all external notifications 2 days prior
Distribute "Progress Update" to media		Binder, Kelley	Include information about Media Center in Treaty Building
Hold ORO meeting for elected officials, emergency responders		LTC Holliday, Barclay, Hamrick, Binder, WDC, URS Coleman, CSEPP	Conduct meeting to address info needs; partner with CSEPP
Set up Media Center in Treaty Building		URS Coleman, WDC staff	
Include start-up information in UMCDF daily and monthly newsletters	Ongoing	Kelley, WDC staff	
Continue internal and external notifications			
Include start-up information in UMCDF daily and monthly newsletters	Ongoing	Kelley, WDC staff	
Send media advisory announcing impending start-up		UMCD, WDC	
Finalize internal and external notifications			
Include start-up information in UMCDF daily and monthly newsletters	Ongoing	Kelley, WDC staff	

Finalize "Media Center" set-up			Refreshments, sign-in book, photocopying supplies
Plan milestone activities			Milestones can include first empty igloo

Day of start-up (16 Aug 04)

Activity	Deadline	Responsibility	Strategy/Status
Operate "Media Center" at Treaty Building		Barclay, Hamrick, Binder, WDC	
Conduct press conference at Treaty Building		Barclay, Hamrick, Binder, WDC	Hold press conference 30 minutes after first rocket processed
Distribute press release announcing first rocket to Blast Fax contact list			
Distribute video and photos of first rocket to media		Kelley, WDC staff	
Distribute media packets		URS Coleman	
Hold Outreach Office open house		URS Coleman	
Prepare Community Information Line update		Kelley, WDC staff	

1 day after start-up (activities continued indefinitely)

Activity	Deadline	Responsibility	Strategy/Status
Distribute daily "Progress Update" to address operational progress and issues		Binder, Kelley	
Daily update to toll-free Community Information Line		Kelley	Allows 24-hour information source to operational status
Conduct "State of Operations" press briefings as needed		Barclay, Hamrick, Binder	
Hold Editorial Boards as needed		Barclay, Hamrick, Binder	
Announce milestone activities			When first igloo is empty When reach full processing rates

30 June 04

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Decision and Information Sciences Division
Argonne National Laboratory
9700 South Cass Avenue, Bldg. 221
Argonne, IL 60439-4844

www.anl.gov