

Glyn Rhonwy Pumped Storage EN010072
UPDATE REGARDING ORDNANCE and RESPONSE TO APPLICANTS COMMENTS AT
DEADLINE 9
8th September 2016
FROM JEFF TAYLOR ON BEHALF OF THE GROUP "CONCERNED ABOUT
GLYNRHONWY"
Reference number: 10031989

Dear Mr Cowperthwaite

For your information I attach a copy of the latest response from the MoD to local MP Hywel Williams regarding the possibility of the presence of chemical weapons at the Glyn Rhonwy site.

The Applicants consultants Zetica initially refuted the possibility of Chemical Weapons being present even though this fact was contained within their own documentation, transcribed from the original clearance certificate when they made reference to the containers of Y3 (mustard gas) and G2 (suspected to be nerve agent - Tabun). The function of these containers is now confirmed by the MoD in their responses both to Dr Dave Preskett and to Zetica.

This latest (attached) response from the MoD .. from Under Secretary of State Mark Lancaster, rather than from the Air Command Secretariat as per previous responses .. confirms for a third time, as below, that chemical weapons material was encountered in the seventies cleanup.

An extensive clearance operation was undertaken in the 1970s. When chemical weapons were identified, Departmental experts were engaged and stringent measures were imposed to restrict chemical contamination. This included the monitoring of the water outflow and the cleansing of all recoveries. Gwynedd River Authority were also involved at an early stage and tests of the water showed no evidence of contamination at the time.

This statement with regard to contamination of local river systems repeats the error found elsewhere in the Applicant's submissions of treating absence of evidence as being evidence of absence. And as we have now become accustomed to "nitpicking" over statements such as these, we note that this does not refer to water testing *later on* in the dewatering and cleanup process nor does it refer to contamination of land, which we now know to have been a problem. And of course techniques for assessing water quality can now be much more refined and sensitive than the methods available at the time. The testing done by Gwynedd Rivers Authority was only in relation to the leachate from "smoke floats" whose active ingredient of concern was trichloroethane. This is not the same "smoke" as in "G2 smoke generators". Our understanding is that these were devices for dispersing nerve agent chemical weapons. The fact that two of them are recorded as having been sent to Porton Down for further processing implies that they were suspected of containing such material.

In our submission at deadline 8 we asked to see the "additional documents" referred to in a handwritten annotation on a letter from the MoD to Zetica that said
"additional records confirm they contained Pyrotechnic/incendiary material only"

The applicants response at deadline 9 asserts that this refers to documents already in the public domain at Caernarfon Records Office, CRO

i) It appears that there has been some misunderstanding of the MOD statement. The MoD stated 'You may wish to note that the attached disposal certificate lists both Y3 and G2 containers, which are designed to hold Mustard Gas and nerve agent respectively.' The MoD is not stating that the containers did contain nerve agents, only that they were designed to potentially contain them. In fact the records already released by the MoD show that the G2 containers found at RAF Llanberis were found to have 'smoke' compositions in them (the pyrotechnic / incendiary material).

Also, as far as the applicant is aware, there are no records of the British military actually weaponising nerve agents, so whilst the MoD statement may be correct in terms of the container design, there are still no records that indicate nerve agents might be present at the site.

We see nothing in the documents at CRO that supports this assertion, and in the paragraphs above the applicant has not provided such documentation or referenced it explicitly. Our request therefore remains unanswered, so we ask again .. where is the evidence that the G2 containers did not contain nerve agents?

We now know, again contrary to Zetica's original assertions, that Mustard Gas containers contained "what it said on the tin" i.e. Mustard Gas. The MoD response does not confirm the presence of nerve agent in the nerve agent containers but nor does it refute this. Whereas empty containers were disposed of on site, other containers were listed as "live recoveries" and were regarded as dangerous enough to require sending to Porton Down for disposal, so without any better information for the time being it is reasonable to apply the precautionary principle and suspect their content was indeed "what it said on the tin" i.e. nerve agent.

Our enquiries with the MoD regarding chemical weapons continue but as you are aware we will not have answers before the close of the enquiry.

One important question to be resolved by our enquiries with the MoD is the precise identity of the nerve agent "G2" whether in containers or smoke generators. The early class of nerve agents to which Tabun belongs were classed as the G-agent series. Tabun was given the name "GA" as the first to be developed in the series; the second was Sarin and given the name GB. Others were Soman (GD) and Cyclosarin (GF). Of all of these, sarin was the most toxic. Using an alpha-numeric classification Tabun becomes G1 while Sarin becomes G2. The MoD in their disclosures to date refer only to "nerve agent" rather than naming Tabun as the agent. The nerve agent stocks captured by British and American forces at the end of the war were composed of Tabun and Sarin. Sarin was believed to have gone with the Americans whilst Britain allegedly took the stocks of Tabun.

The Applicant states that as far as they are aware there are no records of the British military actually

weaponising nerve agents but this is not correct. There are indications in the National Archives that Britain did indeed attempt to weaponise nerve agents, carried out in part at Farnborough. Furthermore, the TNA catalogue shows most of the human testing of nerve agents carried out in Britain after the war on service volunteers (co-incidentally all RAF) was performed using Sarin. Tabun was only examined, according to the archive up until 1947. This is because Sarin is many times more lethal than Tabun and eventually became adopted by NATO as the nerve agent of choice by the early

1950's.

If "G2" turns out to be Sarin then the potential challenges for remediation escalate significantly.

To summarise:

We have established beyond doubt, despite initial claims to the contrary by the Applicant, that mustard gas was dumped in the Glyn Rhonwy Quarry complex and this is confirmed by the MoD.

We have established beyond doubt that nerve agent containers were dumped in Glyn Rhonwy Quarries. These were listed as "live recoveries" as opposed to other empty containers of chemical weapons also listed, and were sent to Porton Down for further processing. We have yet to see any evidence that these contained anything other than what they were intended to contain.

We have very strong photographic evidence (a German KC250 GRIII "Tabun" bomb laying discarded in a slate crevice) that at least one nerve agent weapon was discovered in the quarries during the seventies cleanup and we know that 70,000 of these passed through the area in 1946/46 at a time when large scale munitions disposal was taking place in Glyn Rhonwy.

The chaotic nature and massive scale of the war-time and post war disposal operations, and the subsequent difficulties encountered in the seventies cleanup effort, give us strong grounds for suspecting that some of this material .. not just chemical weapons residues but also residues from incomplete combustion of conventional ordnance material .. still lies within Q6 and will be disturbed by the proposed scheme. The dewatering and excavation of this pit therefore poses serious environmental and public health challenges.

Given what we have now learnt, we believe Glyn Rhonwy is the first authenticated UK land-based (as opposed to sea-based) disposal of nerve agents, which are weapons of mass destruction. As such we have notified the Organisation for the Prohibition of Chemical Weapons – OPCW - in The Hague, and also notified the relevant department in what was until recently the Department for Environment and Climate Change DECC

The Applicant's effort to truly establish the difficulty of these challenges has in our view been inadequate and half hearted. And this also applies to the not unreasonable possibility of radiological waste dumping, which has not been satisfactorily addressed.

We believe that the site requires a thorough and well resourced "forensic archaeology" approach to remediation with the highest level of concern for public and environmental safety.

We believe that such an enterprise is beyond the ability of a private developer whose primary responsibility is to their shareholders and strongly believe the MoD should take back responsibility for the site (their letter to the MP Hywel Williams seems to imply that they think it's the owners problem not theirs).

It is a puzzle to us that the owners Gwynedd Council appear to have been so unaware of what they owned, or that the previous owners Arfon Borough Council should have purchased the site from the MoD in the first place and we question whether they knew its true history.

We therefore urge you to reject this DCO application. Furthermore we invite you to join us in asking the MoD to take back responsibility for the site and carry out a proper remediation before *any* kind of development is carried out at the site.

Jeff Taylor

On behalf of the Concerned About Glyn Rhonwy Group.

This email has been scanned by the Symantec Email Security.cloud service.

For more information please visit <http://www.symanteccloud.com>



Ministry
of Defence

MARK LANCASTER TD VR MP
PARLIAMENTARY UNDER SECRETARY OF STATE AND
MINISTER FOR DEFENCE VETERANS, RESERVES AND PERSONNEL

MINISTRY OF DEFENCE
FLOOR 5 ZONE B MAIN BUILDING
WHITEHALL LONDON SW1A 2HB

Telephone: 020 7218 9000 (Switchboard)

Our ref: D/Min(DVRP)/ML MC2016/07505e

25 August 2016

Dear Hywel,

Thank you for your letter of 26 July 2016 seeking assurances regarding ordnance at the Glen Rhonndwy site near Llanberis in your constituency. While I remain unable to provide any information on ordnance that may or may not currently be at the site, I shall expand upon the details of the clearance which took place in the 1970s, as mentioned in my previous response of 26 May 2016.

An extensive clearance operation was undertaken in the 1970s. When chemical weapons were identified, Departmental experts were engaged and stringent measures were imposed to restrict chemical contamination. This included the monitoring of the water outflow and the cleansing of all recoveries. Gwynedd River Authority were also involved at an early stage and tests of the water showed no evidence of contamination at the time.

Whilst I understand your constituents concerns, I must reiterate that the former RAF Llanberis site was sold by the Ministry of Defence over 40 years ago, therefore in line with the Department's information retention guidelines, the records that are held are limited. Those who have owned the site since may be able to provide more recent information on any investigations or clearance works which may have taken place.

Yours sincerely,

MARK LANCASTER TD VR MP

Hywel Williams MP
House of Commons
London