

AFFIDAVIT OF DONALD VAN WINKLE

1. My name is Donald Van Winkle. I am an adult and a resident of Berea, Kentucky.
2. I work at the Bluegrass Army Depot (BGAD) located near Richmond, Kentucky. I have been working at BGAD in the chemical program since 2002.
3. I work as an air systems monitoring operator/mechanic. I am an RTAP operator. RTAP stands for Real Time Air Monitoring Platform. My pay scale is WG-10.
4. Over the last two years, I have received "excellent" performance reviews. In addition, I have received two Commander's Coins for excellent work performance.
5. My primary duty is to operate air-monitoring units commonly referred to as mini-cams. These air monitors are used to detect chemical warfare agents that might be leaking from munitions currently being stored in igloos at BGAD.
6. The chemical warfare agents contained in munitions at BGAD include VX, GB (Sarin), and HD (mustard). I have been trained and certified to monitor for these agents. The Army reports that there are 523 tons of chemical warfare agents stored in igloos at BGAD.
7. In February or March of this year, I, along with other BGAD employees, attended training sessions with the manufacturer of the air monitoring equipment we use. During our training, we learned that the sampling configuration being used at BGAD to monitor the seven igloos that store munitions containing agent VX was incorrect.
8. The problem was that a decision had been made at BGAD to remove the V to G conversion pads from the distal end of the Teflon sampling tube (the end of the tube that is located in the igloo) and place the pads at the distal end of the heated trace line. This change made accessing the V to G conversion pad easier.
9. As I understand it, conversion pads are needed in sampling for agent VX because VX is a heavy molecule and it needs to be converted to a G agent molecule in order for an air sample to travel through a Teflon sampling tube and into the RTAP for analysis. Absent conversion of

the VX molecule to a lighter molecule, it would be unlikely that an air sample containing VX could be accurately sampled.

10. What we learned during training was that the configuration we were using at BGAD severely compromised our ability to detect agent VX. In fact, what we learned indicated that we were unlikely to detect VX at all.
11. Once we learned that the V to G conversion pads were placed incorrectly, we called from the training location to BGAD to inform management of the problem. Management was concerned, but did not take immediate action to change the sampling configuration or to stop operations inside the VX igloos.
12. When my colleagues and I returned to BGAD from training we began discussing the V to G conversion pad issue with supervisors and others at BGAD. As a result of raising the V to G conversion pad issue, a meeting was called to discuss our concerns and options.
13. The meeting was held on or about February 24, 2005. I spoke out at the meeting about what we had learned in training and raised the concern that workers lives and health may have been jeopardized.
14. During the meeting, a supervisor of lab operations admitted ordering the alteration of the V to G conversion pads from placement at the source of air intake to placement that renders the pads ineffective in detecting agent VX. The lab operations supervisor also admitted knowing that it wasn't a viable set up. These admissions were made in front of at least a dozen employees, including upper management.
15. Current procedures allow workers or visitors to enter the VX igloos when the igloos are checked for obvious leaking munitions and when air sampling results fail to detect agent VX. Because leaking munitions are often difficult to detect, it is clear that at BGAD we have been relying on faulty air monitoring to authorize access to the VX igloos.
16. Based upon my knowledge of BGAD, it appears that we have been ineffectively sampling for agent VX for a considerable period of time. The internal paperwork at BGAD will indicate when the sampling configuration was changed creating this problem.

17. This means, for example, that BGAD's reports to Kentucky environmental officials regarding the monitoring results from the VX igloos has been incorrect for a number of months and possibly longer. Moreover, if VX was erroneously reported as not being present because of the improper V to G pad configuration, then when igloo doors were opened some amount of VX may have escaped into the environment.
18. Following the February 24th meeting, a decision was made to prohibit all personnel from entering a VX igloo until the sampling issue was resolved. It was decided that we would test the sampling configuration. I was involved in a test that placed the V to G conversion pad in the igloo at the end of the sampling tube that draws in the sample. The test revealed that VX was detected with this configuration. Consequently, the V to G conversion pads were reinstalled in all of the VX igloos.
19. In addition to the V to G conversion pad placement issue, I have raised concerns about the change out of the pads. My understanding is that the pads have a limited life and can be greatly affected by heat and humidity. The life of the pads ranges from ten to maybe thirty days. However, at BGAD, it is often the case that the pads are not changed out for more than thirty days. This practice can result in erroneous readings when monitoring agent VX.
20. I have also raised concerns about the maintenance and certification of our air monitoring equipment. There have been a number of occasions when air monitoring equipment had not been properly maintained or had not been certified as ready for operation.
21. Raising these issues has caused me considerable trouble on the job. I have been denied the opportunity to advance. I have been denied training that would further my career and I've been denied overtime. Friends have overheard supervisors discuss firing me. The reprisals for raising these issues have reached the level where I have been given substandard equipment to use for my monitoring activities.
22. As a result of the problems I have described, I have become more vigilant about following procedures and trying to insure my safety, the safety of other workers, and environmental protection. My vigilance has not been well received by some BGAD supervisors/managers.

23. On August 3, 2005, I received a Memorandum from Thomas Bilyeu. Mr. Bilyeu is the Chemical Personnel Reliability Program (CPRP) certifying official at BGAD. CPRP is a type of security clearance needed to work in an area containing chemical warfare agents. The memo charged that I had made suspect queries to my colleagues and that I had displayed arrogant behavior toward Mr. Bilyeu. The memo temporarily disqualified me from performing my monitoring duties until Mr. Bilyeu completes his evaluation. As a result, I have lost hazard pay and overtime and I have been excluded from my normal duties. If I am disqualified from CPRP, I could lose my job.
24. Regarding the issues raised in the memo, in fact, I had made inquiries with some of my colleagues to determine who was aware of the facts regarding some of the issues I raised. I asked some of them to put their concerns in writing. I told some of my colleagues that I was seeking assistance outside of BGAD because my efforts to raise issues within the chain-of-command had proven unsatisfactory. However, contrary to the allegation in Mr. Bilyeu's memo, I have not acted in an arrogant or disrespectful manner toward him.
25. My simple goal is to insure that the dangerous work we do at BGAD is done correctly and in a manner that protects workers and the public. I have lost confidence in how BGAD operates. Before learning about the issues I've discussed herein, I felt that BGAD was operated with safety and environmental protection as top priorities. I have since learned that I must watch out for myself and my colleagues and question what we are told.

I certify that the information contained in this affidavit is true and accurate to the best of my knowledge and belief.


Donald Van Winkle


Date