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NCBC GULFPORT
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MEMORANDUM REGARDING PROPOSAL TO REPROCESS HERBICIDE ORANGE NCBC
GULFPORT MS
10/2/1976
U S AIR FORCE

NNNNZ C1BA485
 PCT UZ YUN RUEFHQA 8677 2861615-UUUU--RUCL81A.
 ZNR UUUUU
 P 12 1620Z OCT 76
 FM OSAF WASH DC/SAFOIP
 TO RUWAAAA/HQ AFLC WPAFB OH/OI
 RUEQAAA/HQ AFSC ANDREWS AFB MO/OI
 INFO RUWAAAA/HQ CINCPACAF HICKHAM HI/OI
 RUVKAAA/USAF HEALTH LAB KELLY AFB TX/OI
 RUEBDSA/D SA CAMERON STATION VA/DSAH-B
 RUEBUAB/DEFENSE PROPERTY DISPOSAL AGENCY
 BATTLE CREEK MI/DPDS-PA
 RUCLERA/ITC KEESLER AFB MS/OI
 RUCL81A/NAVAL CONSTRUCTION BATTALION CENTER
 GULFPORT MS/PA
 RUWSSSS/USAF LOS ANGELES OFC OF INFO 1100
 WILSHIRE BLVD RM 10114 LOS ANGELES CA
 RUEDDQA/USAF NEW YORK OFC OF INFO 663 5TH AVE
 RM 340 NEW YORK NY
 RUCIANA/USAF CHICAGO OFC OF INFO 219 SO DEARBORN
 ST RM 2400 CHICAGO IL
 RUCNAAA/OIMFOS FT BENJAMIN HARRISON IN
 RUEKJCS/OASD WASH DC/PA

INTERESTING
READING

400 PJ
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HOLD
FOR

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UNCLAS SECTION 1 OF 2

SUBJECT: PA GUIDANCE HERBICIDE ORANGE EIS

1. FOLLOWING IS NEWS RELEASE AND QUESTIONS AND ANSWERS TO ANNOUNCE FILING OF FINAL ENVIRONMENTAL STATEMENT ON DISPOSITION OF HERBICIDE ORANGE. AFLC/OI, NCBC-PUBLIC AFFAIRS, AND HQ CINCPACAF/OI MAY RELEASE AFTER 1500 HRS EDT, WEDNESDAY, 13 OCT 76. OTHER ADDRESSEES SHOULD RESPOND TO QUERY ONLY.
2. NCBC-PA SHOULD BE ADVISED OF STANDING QUERY FROM TIMOTHY KRIEHN, GULFPORT SOUTH MISSISSIPPI SUN, AND SHARON PETERS, JACKSON CLARION. HQ CINCPACAF/OI SHOULD BE ADVISED OF STANDING REQUEST FROM BRUCE BENSON, BUSINESS EDITOR, HONOLULU ADVERTISER.
3. NEWS RELEASE READS AS FOLLOWS: QUOTE.
 THE AIR FORCE HAS FILED AN AMENDMENT TO ITS FINAL ENVIRONMENTAL STATEMENT WITH THE COUNCIL ON ENVIRONMENTAL QUALITY (CEQ) REGARDING THE DISPOSITION OF HERBICIDE ORANGE.
 IN THE AMENDMENT, THE AIR FORCE PROPOSES THAT STOCKS OF HERBICIDE ORANGE BE SOLD TO A PRIVATE COMPANY FOR REPROCESSING INTO REGISTERED HERBICIDES. THE REPROCESSING IS PROPOSED INSTEAD OF OCEAN INCINERATION OF THE HERBICIDE. THE REPROCESSING PROPOSAL

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COMPLIES WITH THE PROVISIONS OF THE MARINE PROTECTION, RESEARCH AND SANCTUARIES ACT THAT THE ENVIRONMENTAL PROTECTION AGENCY (EPA) CONSIDER LAND-BASED ALTERNATIVES BEFORE ISSUING A PERMIT FOR OCEAN DISPOSAL. REPROCESSING ALSO COMPLIES WITH EPA GUIDELINES THAT THE DESTRUCTION OF PESTICIDES AND HERBICIDES ONLY BE CONSIDERED WHEN THE RECOVERY OF USEFUL VALUE IS DETERMINED TO BE UNFEASIBLE.

REPROCESSING HERBICIDE ORANGE WOULD RECOVER A USEFUL AND VALUABLE HERBICIDE, AVOID THE COST OF INCINERATION, AND PROVIDE A POTENTIAL NET RETURN TO THE FEDERAL GOVERNMENT.

THE AIR FORCE FINAL STATEMENT IN DECEMBER 1974 PROPOSED DESTRUCTION OF THE HERBICIDE ORANGE ABOARD A SPECIFICALLY DESIGNED INCINERATOR VESSEL IN A REMOTE AREA OF THE PACIFIC OCEAN. DURING HEARINGS ON AN AIR FORCE REQUEST REGARDING PERMITS TO INCINERATE AT SEA IN 1975, THE EPA REQUESTED FURTHER EXPLORATION BE DONE TO PROVE THE FEASIBILITY OF REMOVING THE HERBICIDE DIOXIN BEFORE GRANTING PERMITS FOR NON-PRODUCTIVE DESTRUCTION OF THE HERBICIDE.

HERBICIDE ORANGE WAS USED AS A DEFOLIANT IN VIETNAM. IT IS AN EQUAL MIXTURE OF TWO COMMERCIALY AVAILABLE WEED CONTROL PRODUCTS-- 2,4-D AND 2,4,5-T AND IS REDDISH BROWN IN COLOR. THERE ARE SOME 15,000 55-GALLON DRUMS OF ORANGE STORED AT THE NAVAL CONSTRUCTION

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BATTALION CENTER (NCBC), IN GULFPORT, MISSISSIPPI, AND ANOTHER 25,000 55-GALLON DRUMS AT JOHNSTON ISLAND IN THE PACIFIC.

DOD HALTED THE USE OF HERBICIDE ORANGE IN 1976 WHEN THE DEPARTMENTS OF AGRICULTURE AND HEALTH, EDUCATION AND WELFARE RESTRICTED CERTAIN USES OF 2,4,5-T. THE AIR FORCE WAS NAMED EXECUTIVE AGENCY FOR THE STORAGE AND ULTIMATE SAFE DISPOSAL OF THE ORANGE STOCKS WHEN ITS USE WAS DISCONTINUED. DURING THE MANUFACTURE OF 2,4,5-T, PROCESS FLUCTUATIONS CAUSED CERTAIN LOTS OF THE HERBICIDE TO CONTAIN A SMALL AMOUNT OF A TOXIC CONTAMINANT, TCDD.

THE AVERAGE CONCENTRATION OF TCDD IN ORANGE STOCKS IS ABOUT 2 MG/KG, AND THE TOTAL AMOUNT OF TCDD IN THE ENTIRE STOCK OF ORANGE IS ABOUT 50 POUNDS.

THE DEFENSE SUPPLY AGENCY (DSA) WAS REQUESTED TO WORK WITH THE AIR FORCE TO DETERMINE IF REPROCESSING AND RESALE OF THE HERBICIDE ORANGE STOCKS WAS TECHNICALLY AND ECONOMICALLY FEASIBLE. A PILOT PLANT PROGRAM, CONDUCTED AT THE NCBC, SUCCESSFULLY ADSORBED THE DIOXIN ONTO ACTIVATED CHARCOAL AND REDUCED THE HERBICIDE CONCENTRATIONS OF TCDD TO NO MORE THAN 0.1 MG/KG TCDD. DIOXIN (TCDD) REDUCTIONS TO OR BELOW THIS LEVEL WOULD ALLOW HERBICIDE REGISTRATION FOR COMMERCIAL SALE.

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THE REPROCESSING METHOD WOULD ALLOW THE USABLE HERBICIDES TO BE RECLAIMED FOR PUBLIC USE AND OFFERS THE GOVERNMENT A RETURN ON ITS ORIGINAL INVESTMENT.

DSA PROPOSES TO ACCOMPLISH THE SALE OF HERBICIDE ORANGE FOR REPROCESSING AT THE EXISTING TWO STORAGE SITES. USING THE STORAGE SITES PROVIDES MAXIMUM CONTROL OVER THE UNPROCESSED HERBICIDES AND MINIMIZES ANY POTENTIAL HAZARDS INHERENT IN THEIR TRANSPORTATION.

SEALED CARTRIDGES OF THE ACTIVATED CARBON USED IN THE REPROCESSING OF HERBICIDE ORANGE WOULD HAVE TO BE PLACED IN MONITORED, RECOVERABLE STORAGE UNTIL SUBSEQUENT ENVIRONMENTAL ANALYSES CAN DETERMINE AN ACCEPTABLE DISPOSAL TECHNIQUE FOR THE CARBON. SELECTION OF A STORAGE SITE WOULD BE BASED ON THE SITE'S REMOTENESS, CONTROLLED ACCESS, STORAGE FACILITIES, AN ARID CLIMATE AND IN AN AREA OF LOW SEISMIC ACTIVITY. IT IS ANTICIPATED THAT A SITE UNDER FEDERAL JURISDICTION WOULD PROVIDE MAXIMUM CONTROL WITH A MINIMUM IMPACT ON LOCAL AUTHORITIES.

COPIES OF THE AMENDMENT TO THE FINAL STATEMENT MAY BE OBTAINED FROM THE USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY (AFSC), KELLY AFB, TX 78241. UNQUOTE.

4. THE FOLLOWING QUESTIONS AND ANSWERS ARE TO BE USED IN RESPONSE

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TO SPECIFIC QUERIES ONLY. QUERIES BEYOND THE SCOPE OF THIS GUIDANCE SHOULD BE REFERRED THROUGH CHANNELS TO SAF/OIPA, CAPT MARKSWORTH, AF 22 75175. QUESTIONS AND ANSWERS READ AS FOLLOWS: QUOTE.

QUESTION: WHEN DID THE AIR FORCE FILE THE FINAL ENVIRONMENTAL STATEMENT ON DISPOSAL OF HERBICIDE ORANGE BY INCINERATION AT SEA?

ANSWER: THE FINAL ENVIRONMENTAL STATEMENT, ENTITLED, "DISPOSITION OF HERBICIDE ORANGE BY INCINERATION" WAS FILED WITH THE COUNCIL ON ENVIRONMENTAL QUALITY ON 6 DECEMBER 1974.

QUESTION: WHEN WERE THE PUBLIC HEARINGS ON HERBICIDE ORANGE INCINERATION HELD?

ANSWER: EPA HELD A PUBLIC MEETING ON FEBRUARY 19, 1975, IN WASHINGTON, D.C. ON THE AIR FORCE APPLICATION FOR PERMITS REGARDING OCEAN INCINERATION OF HERBICIDE ORANGE. PUBLIC HEARINGS WERE ALSO HELD IN HONOLULU ON APRIL 25, 1975, AND IN SAN FRANCISCO ON APRIL 28, 1975.

QUESTION: WHEN WERE REQUESTS FOR QUOTATIONS ISSUED BY DSA FOR REPROCESSING HERBICIDE ORANGE?

ANSWER: THE RFQS WERE ISSUED ON FEBRUARY 27, 1975, FOR RETURN ON MARCH 28, 1975. THREE COMPANIES RESPONDED, HOWEVER, AGENT CHEMICAL, INC., (ACI) HOUSTON, TX, IS THE ONLY COMPANY THAT RESPONDED WITH A

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SOLVENTS AND AGITATION TO RELEASE THE IMPURITY FROM THE CARBON ONCE ADSORBED.

QUESTION: HOW MANY FILTERS WERE USED IN THE PILOT PLANT TESTS?

ANSWER: 12

QUESTION: HOW MUCH CARBON DID THEY CONTAIN?

ANSWER: APPROXIMATELY 231 POUNDS TOTAL.

QUESTION: HOW MUCH TODD WAS REMOVED FROM THE HERBICIDE ORANGE AND ADSORBED ONTO THE CARBON?

ANSWER: APPROXIMATELY 13 GRAMS.

QUESTION: WHERE ARE THESE PILOT PLANT FILTER ELEMENTS BEING STORED?

ANSWER: THE CARBON WAS NEVER EXPOSED TO THE ATMOSPHERE. FOLLOWING A RUN, THE CARBON FILTER IN A CANISTER WAS SEALED, REMOVED FROM THE SYSTEM, THEN PLACED INSIDE A HEAVY METAL CONTAINER WHICH WAS WELDED SHUT. THESE SEALED CONTAINERS BELONGING TO THE REPROCESSOR WERE TRANSPORTED BY THE BKK CORPORATION OF WEST COVINA,

CA, FOR BURIAL IN A HAZARDOUS MATERIAL LANDFILL OPERATED BY THAT

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COMPANY IN WEST COVINA. DUE TO THEIR INABILITY TO OBTAIN PROPER PERMITS, THE CANISTERS WERE NOT PLACED IN THE WEST COVINA LANDFILL, BUT WERE TEMPORARILY STORED BY BKK AT ONE OF THEIR OTHER FACILITIES. WE HAVE SINCE BEEN ADVISED BY BKK THAT THEY HAVE BEEN PERMITTED TO DISPOSE OF THE CANISTERS IN A STATE-APPROVED LANDFILL OUTSIDE OF THE STATE OF CALIFORNIA.

QUESTION: DO THESE CANISTERS REPRESENT A TOXIC HAZARD?

ANSWER: NO. UNDER NORMAL STORAGE CONDITIONS THERE IS NO ENVIRONMENTAL HAZARD ASSOCIATED WITH THESE CANISTERS.

QUESTION: HOW MUCH IS THE HERBICIDE ORANGE WORTH?

ANSWER: NEGOTIATIONS FOR THE RESALE OF HERBICIDE ORANGE WOULD HAVE TO BE CONDUCTED BY THE DEFENSE SUPPLY AGENCY WITH CONGRESSIONAL APPROVAL. WE DO NOT INTEND TO SPECULATE ON WHAT THE CONDITIONS OF A CONTRACT FOR SALE WOULD INCLUDE PRIOR TO ITS BEING NEGOTIATED.

QUESTION: WHAT DID THE HERBICIDE ORANGE COST THE GOVERNMENT TO PURCHASE?

ANSWER: \$7.20 A GALLON.

QUESTION: WHAT DOES THE HERBICIDE COST THE GOVERNMENT TO STORE?

ANSWER: STORAGE OF THE DRUMS, INCLUDING MONITORING AND RE-DRUMMING AS NEEDED AT BOTH STORAGE SITES, COSTS APPROXIMATELY \$12,000 A MONTH.

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QUESTION: DO YOU ANTICIPATE THAT A STORAGE SITE FOR THE CARBON CANISTERS WOULD BE ON A FEDERAL INSTALLATION?

ANSWER: YES. IT SEEMS THAT INTERIM STORAGE ON PROPERTY ALREADY UNDER FEDERAL JURISDICTION WOULD PRECLUDE PROBLEMS ASSOCIATED WITH THE

EXERCISE OF EMINENT DOMAIN, INFRINGEMENT ON INTERNATIONAL LAW, CONFLICT WITH LOCAL GOVERNMENTAL AUTHORITY, OR CONTROVERSY THAT WOULD BE EXPECTED BY USING A PRIVATE COMMERCIAL STORAGE SITE.

QUESTION: HOW LONG DO YOU THINK IT WOULD BE BEFORE A METHOD OF DISPOSAL FOR THE CARBON IN THE FILTERS COULD BE DEVELOPED?

ANSWER: THE ULTIMATE DISPOSAL OF THE CONTAMINATED FILTERS WILL REQUIRE FURTHER ENVIRONMENTAL ANALYSIS. THE MONITORED, RETRIEVABLE STORAGE OF THE CANISTERS ASSOCIATED WITH THE REPROCESSING REPRESENTS A GOOD INTERIM SOLUTION WHICH IS PREFERABLE TO LONG TERM STORAGE OF HERBICIDE ORANGE OR DELAY IN REPROCESSING IT INTO A USABLE HERBICIDE. HOW LONG IT WILL TAKE TO PROVE AND SELECT AN ENVIRONMENTALLY ACCEPTABLE METHOD OF DISPOSAL FOR THE CARBON IS NOT KNOWN- UNQUOTE.

5. PLEASE PROVIDE FOLLOW-UP CLIPPINGS TO SAF/DIPA, PENTAGON, WASHINGTON, D.C. 20330.

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6. ACTION OFFICER FOR SAF/DIPA IS CAPT GARY HARKSWORTH, AV 22 75175, AC 282 697-5175. FOR AFLC/DIP: MARY WILSON, AV 787-6533, FOR DSA/PUBLIC AFFAIRS: MR. CHESTER SPURGEON, AC 202 274-6135.

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