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NCBC GULFPORT
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LETTER FROM U S AIR FORCE REGARDING APPROVAL OF CLEANING AND RETURN OF
TANK CARS USED TO TRANSPORT HERBICIDE ORANGE NCBC GULFPORT MS

9/23/1977

U S AIR FORCE



23 SEP 1977

OFFICE OF THE ASSISTANT SECRETARY

MEMORANDUM FOR MAJOR GENERAL H.R. DEL MAR, COMMANDER
MILITARY TRAFFIC MANAGEMENT COMMAND

SUBJECT: Certification for Reuse of PACER HO Rail Tank Cars

Please reference our mutually agreed plan of action described in my message of 201705Z May 1977.

Rail car cleaning procedures were acceptable to the Environmental Protection Agency (EPA) in our AFLC PACER HO Programming Plan 75-19, April 1977. We also point out that similar procedures and verification cleaning tests were approved by EPA for the herbicide drums and ship cargo tanks.

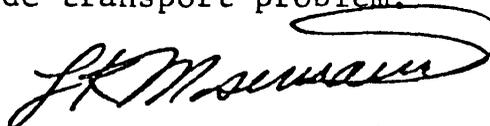
The objectives of tank car cleaning were to certify the cars sufficiently clean so that there would be no environmental concern or risk regarding:

1. The quality or use of diesel fuel oils or commercial grade chlorinated aromatic hydrocarbon products next carried in these cars; or
2. The removal and disposal of non-toxic traces of 2,4-dichlorophenoxy acetic acids and esters, and 2,4,5-trichlorophenoxy acetic acids and esters (2,4-D and 2,4,5-T) from the cars, if such removal were required for other special hydrocarbon product cargos.

These objectives would be achieved if the cars were cleaned of all visual residues, degassed, and no herbicide toxic contaminate 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) could be detected in wipe samples collected from the cars' interior surfaces and analyzed using research, state-of-the-art analytical techniques. Any remaining traces of 2,4-D and 2,4,5-T are environmentally non-toxic.

The attached report identifies the ODX rail cars used and describes the cleaning, wipe sampling, and TCDD analytical procedures used. No detectable residuals of TCDD were found in any rail car. We, therefore, certify these cars environmentally acceptable to carry future cargos of diesel fuel oils or commercial grade chlorinated aromatic hydrocarbon products. We further certify that, if quality specifications of some other special hydrocarbon cargo product require removal of remaining traces of 2,4-D and 2,4,5-T, then routine industrial cleaning and rinseate disposal practices can be safely used without concern for TCDD to achieve the desired car cleanliness.

Based upon the above certification, your staff may take direct action with AFLC to return the cars to MTMC for future uses. Thank you very much for MTMC's support and cooperation in solving this difficult herbicide transport problem.



L. K. MOSEMAN II
Deputy Assistant Secretary
(Logistics),

Attachment-
Report on Rail
Car Cleaning

CC: AFLC/LO PACER HO Project Director

SAFALG Chron
SAFMIQ
AF/LGY
AF/LGT
AF/SGPA
✓ NCBC - Mr. Anderson
OLAA OEHL/Kelly AFB