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## POSITION PAPER

ON

### IMMEDIATE DISPOSAL/RECYCLE OF 18 UC-123K “AGENT ORANGE” AIRCRAFT

1. BLUF. Recommend immediate disposal/recycle of 18 UC-123K “Agent Orange” aircraft stored at Aircraft Maintenance and Regeneration Group (AMARG), Davis-Monthan AFB. Trace and low levels of contamination found in sampling of four aircraft justify disposal/recycle of all the aircraft immediately, rather than spending additional time and money to sample the remaining 14 aircraft.

2. Background. 18 UC-123K “Agent Orange” aircraft are quarantined at AMARG/Davis-Monthan AFB in Tucson, AZ. Most or all of the aircraft were used in “Operation Ranch Hand” in Vietnam between 1962 and 1971. They were inducted into AMARG between 1980 and 1986. Initial sampling of all 18 aircraft in 1996 confirmed the low level presence of residual herbicides, dioxins and furans from operations in Vietnam and subsequent Aerial Spray Flight operations. These low levels are safe to handle in recycle operations in accordance with (IAW) EPA risk based screening standards and support Phase 1 sampling results from four aircraft in February 2009.

3. In February 2009, Hill AFB 75<sup>th</sup> Civil Engineering Group/Environmental Compliance Branch (75 CEG/CEVC), sampled four of 18 UC-123K aircraft in Phase 1, at Davis-Monthan AFB and found trace levels and low levels of contamination in the interior of the aircraft. They also sampled inside one of the 15 Agent Orange spray tanks stored with the aircraft and found higher concentrations of contaminants, but they are still considered safe to recycle because exposure to personnel is minimal.

4. In April 2009, 505 ACSS requested \$70K of BA01 center funds to execute a contract for Phase 2, sampling the remaining 14 aircraft. The Phase 2 UC-123K Contamination Testing is currently Priority 9 on the center “yes list”. Phase 2 sampling and the requested funding is no longer considered necessary if immediate disposal of the aircraft is approved.

5. In July 2009 Phase 1 Sampling Final Report was published. The results indicate the four aircraft are safe for personnel involved in short term recycling operations, which means workers can work in the aircraft all day for a year, IAW EPA risk-based screening standards. Also, Phase 1 results are consistent with 1996 initial sampling which confirm the presence of residual low levels of Agent Orange herbicides, dioxins and furans.

6. On 20-22 July 2009, Dr. Wayne Downs, Hazardous Waste Program Manager, 75 CEG/CEVC Hill AFB, and Mr. Jim Malmgren, 505<sup>th</sup> Aircraft Sustainment Squadron (505 ACSS) went to Davis-Monthan AFB to discuss details of disposal/recycle of 18 UC-123K “Agent Orange” aircraft. Dr. Downs and Mr. Malmgren also observed actual aircraft disposal/recycle activities at Huron Valley Fritz-West (HVF-West), the contractor used most frequently by AMARG and Defense Reutilization and Marketing Service (DRMS) at Davis-Monthan AFB. No workers handled any parts or pieces of the disposal aircraft. Disposal is accomplished by machinery and equipment operated remotely by the workers at the recycle plant. Consequently, after observing

aircraft being dismantled, crushed and shredded into piles of cell-phone size pieces, both Dr. Downs and Mr. Malmgren concluded that there would be no harmful contamination hazard to workers involved in disposal/recycling of the UC-123K aircraft or of the 15 spray tanks and associated equipment in and around the quarantined aircraft. Additionally, disposal can be done at no cost to the US Air Force. The recycle contractor purchases the aircraft from DRMS as scrap metal and the money goes into the US Treasury.

7. Supporting this document is a Memo For The Record, dated 27 July 2009, from Alvin L. Young, Ph.D. Dr. Young serves as Consultant to the Under Secretary of the Air Force for Installations and Environment and as Consultant on Agent Orange to the Office of the Secretary of Defense. The memo explains why the Air Force should dispose of/recycle the 18 UC-123K "Agent Orange" aircraft as soon as possible to avoid further risk from media publicity, litigation, and liability for presumptive compensation.

8. After careful study of Phase 1 sampling data from four aircraft and observing the actual recycle of aircraft by remote equipment, Dr. Wayne Downs, Dr. Karl Nieman (75 CEG/CEVC), and Dr. Young recommend immediate disposal/recycle of all 18 UC-123K "Agent Orange" aircraft with no further sampling of the remaining 14 aircraft.

9. Phase 2 sampling of the remaining 14 aircraft could be beneficial because it would provide complete scientific data for all 18 aircraft, and substantiate future Air Force decisions. However, Dr. Young points out that there are no reasons to suspect that the data would vary significantly if additional samples are collected beyond the first four aircraft. He concludes that the analytical data from Phase 1 is a sufficient statistical representation of all 18 aircraft. Also, there is continued public awareness risk from waiting six to eight more months to receive funding, complete Phase 2 sampling, receive the final sampling results, and await Air Force decision to recycle the 18 aircraft.

10. Dr. Young also pointed out that the storage of UC-123Ks in the Arizona sun for over 20 years has further degraded the contamination. Chopping up the aircraft will also reduce any concentrated dioxin residues to negligible levels.

11. Conclusion. Data from Phase 1 sampling of the first four aircraft, combined with 1996 initial sampling, is sufficient statistical representation for the remaining 14 aircraft to justify immediate disposal/recycling of all 18 aircraft without additional sampling.

12. Recommendation. Recommend no additional sampling of the remaining 14 aircraft. Further recommend immediate disposal/recycling of all 18 UC-123K "Agent Orange" aircraft, and smelting of the entire scrap metal from the aircraft to ensure complete destruction of all dioxins, furans, and herbicides. Recommend personnel from 505 ACSS/GFLA and Hill AFB 75 CEG/CEVC personally observe, witness, and certify recycling of the 18 aircraft at the contractor site in Arizona and also the smelting of the scrap at the smelting facility (location TBD). In response to Dr. Young's recommendation, 75<sup>th</sup> Air Base Wing Environmental Public Affairs has prepared news releases in preparation for media inquiries at the time of disposal and smelting.

Mr. Buddy Boor/505 ACSS/586-1206/jm/5 Aug 09