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[Handwritten initials]

Mr. [REDACTED]
[REDACTED]
23 MAY 1978

ACMS, J4 C, Maj Sp4 Br

Contaminated Pesticides and Excess Chemical Products

To provide an updated status on action taken to dispose of contaminated pesticides and excess chemical products within Eighth Army.

a. Eighth Army has in its possession large quantities of excess chemicals, which includes pesticides, insecticides, herbicides, etc., which because of their condition cannot be used. The bulk of these chemicals are located at AFE-Yongson and USAMSC-E (Area 4).

b. The chemicals are divided into four major groups as follows:

- (1) Serviceable chemicals (newly generated excess-nonhazardous).
- (2) Serviceable chemicals (carryover from previous years-includes hazardous chemicals).
- (3) Unserviceable chemicals (includes hazardous chemicals).
- (4) Unserviceable chemicals (primarily contaminated pesticides belonging to the various AFE's).

c. In Aug 77, the J4 was asked for assistance in obtaining disposition instructions for only those items indicated in paragraph b(4) above. Subsequently, additional groups of chemicals were identified and included in the disposal problem. Currently several hundred tons of chemicals are involved in the dilemma.

d. The current situation for each group of chemicals is as follows:

- (1) Serviceable chemicals - This represents approximately 20 Hqs items with a value of approximately \$41,000. A msg (DTC 161500 May 78) indicates that disposition instructions have been sent from the Defense General Supply Center (DGSC) and should arrive this week (22-26 May). All of these items

DT MS-MC

SUBJECT: Contaminated Pesticides and Excess Chemical Products

are located at Camp Carroll and no problems are anticipated with handling, transportation, etc. Material should leave Korea by 30 Jun 78.

(2) The remaining three groups of chemical represent approximately 16 line items with a value of approximately \$190,000. In May 1977, most of these items were reported as excess to DGSC. Disposition instructions initially provided by DGSC were to turn-in the chemicals over to the local DPDC. However, the DPDC refused to accept the chemicals because they have no potential resale value. Although no reply was received from our backchannel to BG Coleman, DPDC has revised their position to accept the chemicals "in place", if any local Korean chemical company expresses interest in the chemicals. A letter was sent to the Korean Ministry of Commerce and Industry soliciting interest in the excess chemicals. A reply should be received within the next two weeks.

c. Problems - We can anticipate that only a few, perhaps none of the chemical products will be accepted by the ministry for possible sale to Korean chemical companies. Therefore, we must insure that additional alternatives are explored. The most probable alternative will be ultimate disposal in CONUS. In order to return the chemicals to CONUS the following tasks must be accomplished:

(5) Repackage chemicals to conform to EPA and DOT regulations - Initially packaging specifications were not available within Eighth Army. They were requested from DGSC and finally arrived in mid-April. Personnel from the 6th Spt Can and FEA-X have reviewed the specifications and determined that a waiver to certain requirements of the specifications is necessary. Specifically, specialized containers and facilities to apply a bisphenol epoxy and phenol-formaldehyde coating are not available in country. A msg was sent to the US Army Environmental Health Agency on 19 May 78 requesting a one-time exception to these packaging specifications. A reply to this request is expected by the second week in June. If the request for waiver is denied, an additional 2-3 months will be required to obtain containers which meet EPA and DOT requirements.

(2) Disposition of chemicals - As mentioned earlier, our backchannel to BG Coleman, DLSC, was never answered. Informally, the Defense Property Disposal Region (DPDR) Pacific Detachment Korea, has obtained historical information from this office and provided it to the DPDR staff. The DPDR commander (MAJ [redacted]) has stated that if the chemicals cannot be sold the

DJ-MS-MC

SUBJECT: Contaminated Pesticides and Excess Chemical Products

DPDR will not accept them. To preclude additional delay in disposal of the chemicals, a msg was sent to Edgewood Arsenal (Info DLA) requesting disposition instructions for the chemicals. Hopefully, a reply will be received in early June.

1. Summary - The item manager of the chemicals (DGSC) has instructed Eighth Army to turn the chemicals over to the DPDR. DPDR will not accept the material unless they can be sold. DPDR is attempting to find a local chemical company to purchase the chemicals. We attempted to do this in Nov-Dec 77 with negative results. We also contacted the ROK services to determine if they had a requirements for the chemicals. ROKA is interested in some of the chemicals, but only if they are provided at no cost. DPDR is exploring the legality of turning material over to ROKA at no cost. Anticipating shipment to CONUS, a waiver to packaging requirements and a request for disposition instructions through DA channels have been requested.

g. Conclusions - All legal methods for disposal of the chemicals are being explored. If a favorable response is received from USAEMA on the waiver of specialized packaging and disposition instructions are received from Edgewood, then, we can expect shipment of the chemicals to CONUS in Oct 78. If we are required to strictly adhere to the packaging specifications, shipment out of Korea will be delayed until Dec 78.

151 [redacted]
for DON R. WELLS
COL, USA
Chief, Materiel Support Branch

MFR: 23 May 78 kya

Self explanatory.

Mr. [redacted] DJ-MS-MC/3624 [redacted] date 27 May

COORD:

DJ-MS-MC [redacted] date 23 May

= Interest to CCTF Investigative LOO

= General Interest

USFK/EUSA SUMMARY SHEET (USFK MEMO 340-15)						SJS LOG NO.:		
NO.	TO	ACTION	CONCUR	NON-CONCUR	SIGNATURE (SURNAME), GRADE, & DATE	COMMAND GROUP COORDINATION		
						NO.	TO	ACTION
1	J-1	Safety Coord	X		Mr. [REDACTED] NOV 1988			
2	J-3	Coord	X w/	cmt	MG Carpenter 14 NOV 1988	9.	SJS Coord	
3	J-4	Coord	X w/	cmt	BC Akin 16 NOV 1988	10.	DCS Coord	
4	PAJ	Coord	X w/	cmt	COL H.T. Linker 11 NOV 1988	11.	CS Approv	
5	RMJ	Coord	X		Mr. [REDACTED] 9 NOV 1988		DCDR	
6	BAMC Prev	Med Coord	X		MAJ [REDACTED] 8 NOV 1988		CDR	
7	EAFE Environ	Coord	X w/	cmt	Mr. [REDACTED] 16 NOV 1988	REMARKS:		
8	ENG	Coord	X w/	cmt	LTC [REDACTED] 15 NOV 1988			
9								
10								
11								
STAFF/ORGANIZATION			ACTION OFFICER			PHONE NO.	SUSPENSE DATE	DATE
JAJ-AL (27-1a)			MAJ [REDACTED] b6			[REDACTED]	b6	18 NOV 1988
SUBJECT: Hazardous Material Report								
PURPOSE: To advise the Chief of Staff as to action on AR 15-6 investigation.								
<p>1. DISCUSSION: a. On 30 May 1988, LTC [REDACTED] b6 was directed to informally investigate allegations of mishandling of hazardous waste in Eighth Army (Tab A). His findings are at Tab B. Essentially, he found that the specific allegations made by Mr. [REDACTED] a disgruntled former employee, were unfounded. He also found, however, that Eighth Army has no hazardous material program to speak of; hazardous material management involves many different agencies and staff sections; and there is no central authority at HQ, Eighth Army, to develop, implement, and oversee such a program. His in-depth review of the situation is at Tab C, and his recommendations for remedying the situation are at Tab D. Essentially, he recommends we determine the standards we must meet, establish a central authority with overall responsibility for the hazardous material program; and implement the program ASAP. Recommendations 17 and 18 cannot be implemented because Mr. [REDACTED] is no longer in the command. Recommendations 19 and 30 are for information only; no action is needed on 19, and 30 has largely been accomplished. b6 LTC [REDACTED] should be permitted to close the investigation without interviewing Mr. [REDACTED] as he requests in Recommendation 31. The real goal is to address the hazardous material situation.</p> <p>b. The Chief of Staff can approve or disapprove any or all of the findings and recommendations. There is no need to immediately approve or disapprove the findings and recommendations, but there is a need for command emphasis and action. Because of the number of areas involved (e.g., FEAK, J-4, JAJ, PAO, Preventive Medicine), input and cooperation from all of them will be required. The Environmental Engineer at FEAK would appear to be the appropriate point of contact to coordinate any action. My office stands ready to assist in developing an effective program.</p>								
2. RESOURCE IMPACT: None.								
						IAJ LOG # 2307-88 DISPATCHED ON: 18 Nov 88 FILE REF: Environmental Related Activities 88-0868 [REDACTED]		

3. RECOMMENDATION: That the Chief of Staff direct the findings and recommendations be staffed with the appropriate agencies and sections, and that the Environmental Engineer take the lead in developing an Eighth Army environmental program evaluating the feasibility of implementing IIC [REDACTED] recommendations, and recommending a plan of action.

b6

Carroll J. Tichenor

CARROLL J. TICHENOR
Colonel, JA
Judge Advocate

12 Encls

1. Tab A - Allegations by Mr. [REDACTED] b6
2. Tab B - IIC [REDACTED] Findings
3. Tab C - IIC [REDACTED] Review
4. Tab D - IIC [REDACTED] Recommendations
5. Tab E - J-1 Coordination
6. Tab F - J-3 Coordination
7. Tab G - J-4 Coordination
8. Tab H - PAJ Coordination
9. Tab I - RMJ Coordination
10. Tab J - EAMC Coordination
11. Tab K - EAFE Coordination
12. Tab L - ENG Coordination



DEPARTMENT OF THE ARMY
U.S. ARMY MATERIEL SUPPORT CENTER, KOREA AND CAMP CARROLL
APO SAN FRANCISCO 96460-0286

EANC-MSC-ST

8 September 1987

SUBJECT: Correct Safety Violation.

TO: Director, Materials Transportation Bureau,
U.S. Department of Transportation 4007th St., SW.,
Washington, D.C. 205090

U.S. Department of Labor Occupational Safety and
Health Administration
ATTN: Safety/Transportation,
Washington, D.C. 20310

U.S. Army Safety Officer
ATTN: CSSG-PR, Mr. [REDACTED] b6
Safety/Transportation, Fort Rucker, AL 36360

Congressman NORM D. DICKS
House of Representative Room No. 242P
Washington, D.C. 20515

1. Request your assistance in correcting an extreme Hazardous Problem Area in Shipping of Hazardous Material and other Freight.
2. Personnel processing Hazardous Materials for Shipping are unable to read, write or understand English, for 5 years, I have try to place personnel in Hazardous Material Training, during the past two(2) years, two Korean Employees have satisfactory completed training as required, IAW, 49 title code of Federal Regulation and TM 38-205, Preparation of Hazardous Material for Military Air Shipment. The other personnels are unable to understand the two Regulation and above (EX 1, 2) most have failed the Hazardous Material Course from one to three times (EX 3, 4), at the present time all are processing Material and were not reassigned from there position.
3. I have submitted a list (EX 5) of personnel requiring special training in Hazardous Materials and Standard Form 52's for two of the personnel to be reassigned from there present position into a position which require less use of the English Language and less technical skills, when the Korean employees learn of this, they stages two sitdown work storages, and threatening to go on strike,

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if I was not remove from my position and a waiting petition was submitted concerning this, management keep me assigned to the position, but I was not to pass any instructions to KN employees or to enter the Transportation Work Area at any time (EX 6), and stated to the KN employees in (EX 7) Memorandum of Agreement Training would be provide in time, if required, with the system here in Korea that will be years, in the mean time, KN employees are Shipping Hazardous Materials and still unable to understanding English.

4. During the past eight(8) years, there have been hundreds of mistakes in Shipping Hazardous Materials both within Korea and to CONUS and other Oversea Areas, i.e. 1981, the Shipment of Milvans to CONUS of Hazardous Materials the Coast Guard, fined ██████████ b6 Container Company for \$122,000 on that shipment, the case is on file in California with the Coast Guard, and KN employees are doing the shipments as always, Mr. ██████████ b6 who failed the special training three times, was the one who processed the above shipment (EX 4).

5. Corrective or Remedial Action Sought.

a. Stop Shipping of Hazardous Materials from Camp Carroll, Korea, until personnel listed on (EX 5) are school training in Shipping Hazardous Material by all Modes of Transportation, that are used by MSC-K. If KN employees are unable to satisfactory completed training in all Modes of Transportation, then reassign them to other positions.

b. Establish a Traffic Management position at the MACOM level, (J-4 Transportation Division) to inspect on a quartly basis Freight Shipping, Hazardcus Material Shipments and the Training of Traffic Management Personnel in Traffic Management. 31

c. Reinstatement in the position as Transportation Officer with no limitation, IAW my position description.

d. Conduct an on-site inspection of Freight Operation at Camp Carroll, Korea. The inspection must be conduct by personnel knowledgeable in Hazardous Material and Oversea Freight Shipment to include myself on this on-side inspection, I am due to return to CONUS in November 1987, my address an phone in CONUS is: 5332 Frances Ave, N.E., Tacoma, WA 98422, Phone: 206 952 6202 My work site: Traffic Manager, Naval Supply Center, Bremerton, Washington.

e. The bottom line is if, KN employees are allowed to process Hazardous Materials for Shipments, who are unable to read Regulations in English then, Material Support Center, is asking for serious problems, which can be in personnel lifes and property, damages into the millions.

██████████ b6
Transportation Officer
USASMC-K & CC
APO SF 96460-0286



HEADQUARTERS, UNITED STATES FORCES, KOREA
APO SAN FRANCISCO 96301-0010



REPLY TO
ATTENTION OF:

CJ-CC

28 October 1988

MEMORANDUM FOR: SJS

SUBJECT: Report of AR 15-6 Investigation

1. The Investigating Officer coordinated with MAJ [REDACTED]^{b6} the Legal Review Officer on 27 October to provide additional information. The findings are:

a. EUSA has not developed regulatory guidance for the management of hazardous material and hazardous waste handled by US Army operations in Korea. (Substantiated)

b. EUSA has not delegated staff responsibility or a focal point for overall management of hazardous material and hazardous waste programs in Korea. (Substantiated)

c. EUSA has not developed contingency plans for the prevention of and response to a sudden and non-sudden release of hazardous material and hazardous waste. (Substantiated)

d. EUSA Staff Judge Advocate has not reviewed the Ministry of Health and Social Affairs Environmental Standards and Korea's Environmental Preservation Laws to define EUSA environmental compliance standards. (Substantiated.)

e. It is unsubstantiated that Mr. [REDACTED]^{b6} rights were violated by the chain of command or that actions by 19th Support Command and MSC-K taken to remove Mr. [REDACTED]^{b6} from the workforce were improper.

f. It is substantiated that outside agency inspection reports on hazardous material and hazardous waste management were not properly disseminated nor corrective action taken in a timely manner.

g. It is substantiated that the Occupational Safety Health Act (OSHA) Program is not properly supported.

h. It is unsubstantiated that a Korean national employee paid a bribe to a civilian personnel officer in order to gain employment as alleged by Mr. [REDACTED]^{b6}

i. It is unsubstantiated that unqualified personnel at MSC-K, Camp Carroll were certifying the DD 1387-2 for air shipment of hazardous cargo as alleged by Mr. [REDACTED]^{b6}

j. It is unsubstantiated that hundreds of violations were made in the air shipment of hazardous material and hazardous waste as alleged by Mr. [REDACTED]^{b6}

CJ-CC

SUBJECT: Report of AR 15-6 Investigation

k. It is unsubstantiated to halt shipments of hazardous material or hazardous waste by any surface means from Camp Carroll, MSC-K as alleged by Mr. [REDACTED] b6. The packing and safe handling of hazardous cargo is being done IAW TM 38-250 and AFR 71-4. However, the investigation report indicates areas of concern and need for chain of command emphasis.

l. It is unsubstantiated that KN/US personnel handling or processing hazardous material must have completed a formal Department of Transportation School course of instruction as alleged by Mr. [REDACTED] b6.

m. It is substantiated that Mr. [REDACTED] b6 used abusive language around and directed at Korean national employees and his DAC supervisor. Mr. [REDACTED] b6 created a negative work environment by his actions toward subordinates. (See page 22.)

n. It is substantiated that Mr. [REDACTED] b6 as the Transportation Officer failed to establish an informal hazardous material training program and document the training, required by TM 38-750.

o. It is substantiated that qualified staffs at EUSA, 19th Support Command and MSC-K have not inspected hazardous material management in an integrated and coordinated staff effort. In depth inspections are required.

2. With regard to paragraph b(1), (2) of the SJA comments, it's a shame. This rests with the chain of command and its failure to realize and find out how Mr. [REDACTED] b6 treated Korean national employees and others. Paragraph (3) is the responsibility of CDR MSC-K and 19th Support Command.

3. As the Investigating Officer I have no intention of discussing anything with Mr. [REDACTED] b6. Mr. [REDACTED] b6 cannot provide any relevant information to this AR 15-6. The evidence against Mr. [REDACTED] b6 in this report is overwhelming. I recommend the AR 15-6 be read with attached evidence reviewed.

4. As I have stated in the course of the investigation, hazardous material and management thereof is a complex issue as discussed on page 15. EUSA and subordinate staffs have a lot of work to establish a hazardous material program. It will take time, resources, delineation of staff responsibilities and inspections.

5. I have no objections to the release of my name as the Investigating Officer or the report to outside agencies, Congressmen and Mr. Brown. Final release authority remains with CS, EUSA.

[REDACTED] b6
ETC, FA
AR 15-6 Investigating Officer

DISPOSITION FORM

For use of this form, see AR 340-15; the proponent agency is TAGO.

REFERENCE OR OFFICE SYMBOL

CJ-CC

SUBJECT

AR 15-6, Hazardous Cargo MSC-K

TO

Commander
HQ EAST, ATTN: DOL
APO SF 96301

FROM

LTC [REDACTED] b6
USFK C/J3, CJ-CC
APO SF 96301-0009

DATE

10 August 1988

CMT 1

1. The informal AR 15-6, attached is forwarded for your review and action. Chief of Staff EUSA is the directing authority.
2. A draft copy less evidence and statements were provided to J-4 Transportation Div, and Chief of Staff, 19th Support Command, 9 Aug 88.
3. POC is LTC [REDACTED] CJ-CC, [REDACTED] b6

[REDACTED] b6
LTC, FA

AR 15-6 Investigations Officer

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DEPARTMENT OF THE ARMY
HEADQUARTERS, EIGHTH U.S. ARMY SPECIAL TROOPS COMMAND & AREA III
APO SAN FRANCISCO 96301-0008



REPLY TO
ATTENTION OF:

EAST-LS

15 September 1988

MEMORANDUM THRU: DEPUTY OF STAFF

FOR: CHIEF OF STAFF

SUBJECT: AR 15-6 Investigation No. 105-88

The Report of Investigation under the provisions of AR 15-6 is forwarded for your information and action as deemed appropriate.

Encl
as

Joseph R. Simino
JOSEPH R. SIMINO
COL, FA
Commanding



HEADQUARTERS, UNITED STATES FORCES, KOREA
APO SAN FRANCISCO 96301-0010



REPLY TO
ATTENTION OF:

JAJ-AL (27-1a)

12 OCT 1988

MEMORANDUM FOR: SJS

SUBJECT: Report of AR 15-6 Investigation

This office has reviewed subject report of investigation. The following comments are submitted:

a. The investigating officer has done an outstanding job of sorting through regulations, testimony, and historical documents in this matter. Because findings are buried in recitations of background matters, however, it is difficult to determine what his findings actually are. Recommend he separate his findings into a more succinct statement, and indicate whether any of Mr. [REDACTED] ^{b6} allegations are founded. His narrative should also include information on exactly what he was tasked to investigate, as his eventual appointment was oral, and the information concerning Mr. [REDACTED] ^{b6} management style appears, at first blush, tangential to his original charter.

b. The following comments pertain to the investigating officer's recommendations:

(1) Recommendation 17: Mr. [REDACTED] ^{b6} has departed the command. No further action can be taken against him.

(2) Recommendation 18: Unless appropriate action was taken before Mr. [REDACTED] ^{b6} departed this command, he cannot be denied re-employment in Korea if he applies and is otherwise qualified for the position.

(3) Recommendation 30: The findings are not specific enough to support removal of all adverse information from the files of all civilian and military personnel. The investigating officer must determine what adverse actions were taken and substantiate that they were, in fact, inaccurate. If the findings support it, the command may initiate appeals on behalf of the soldiers affected IAW AR 623-205, and may act on behalf of civilian employees IAW USFK Reg 690-1.

c. The investigating officer indicates he did not interview Mr. [REDACTED] ^{b6} because it would have necessitated naming Mr. [REDACTED] ^{b6} a respondent and appointing a formal board. This is not necessarily true. A respondent need only be designated if the appointing authority wants to give him a hearing. The possibility of adverse recommendations against Mr. [REDACTED] ^{b6} is not dispositive. If the investigating officer or appointing ^{b6} authority believes Mr. [REDACTED] ^{b6} can provide relevant information, he can and should be interviewed.

///

JAJ-AL

SUBJECT: Report of AR 15-6 Investigation

d. All recommendations appear supported by the evidence; however, as noted previously, a more succinct statement of findings is necessary

e. Assistance in completing these actions may be obtained from this office. POC is MAJ [REDACTED] b6

FOR THE JUDGE ADVOCATE:

[REDACTED] b6
LTC/SA
Chief, Admin Law Division

1. Background:

a. On 20 April 1988, an AR 15-6 was directed to investigate the allegations of possible violations in the shipment and handling of hazardous materiel, MSC-K, Camp Carroll, Korea, Exhibit A. The AR 15-6 preliminary preparation revealed an IG investigation was directed by CG, 19th SUPCOM into the same allegations. In view of this, it seemed prudent to wait the outcome of the IG investigation, its findings and recommendations before proceeding with the AR 15-6. On 3 May 1988, the AR 15-6 was terminated by Director of Logistics, EAST, Exhibit B. On 30 May 1988, I was called by the Director of Logistics and directed to proceed with the AR 15-6 investigation.

b. The preliminary proceedings looked at the Status of Forces Agreement (SOFA) and Korean law in terms of shipment and management of hazardous material. The investigator queried EUSA staff agencies SJA, J-4, Safety, Feak, Internal Review, DEH, 18th MEDCOM and 5th Preventive Medicine. Purpose was to review EUSA policies, responsibilities, procedures, and standards for the systemic control, monitorship and management of hazardous materiel and hazardous waste program.

Investigating Officer reviewed in detail the allegations made by Mr. [REDACTED] b6
[REDACTED] b6 his treatment by 19th Support Command Office Civilian Personnel (OCP) and the circumstances surrounding the 19th Support Command's decision to remove [REDACTED] b6 from the work force area at Camp Carroll, Korea. The investigation also focused on Transportation Division MSC-K Korean National employee unrest at Camp Carroll, Korea.

	YES	NO	N/A
2 Exhibits (para 3-16, AR 15-6)			
a. Are all items offered (whether or not received) or considered as evidence individually numbered or lettered as exhibits and attached to this report?	X		
b. Is an index of all exhibits offered to or considered by investigating officer or board attached before the first exhibit?		X	
c. Has the testimony/statement of each witness been recorded verbatim or been reduced to written form and attached as an exhibit?	X		
d. Are copies, descriptions, or depictions (if substituted for real or documentary evidence) properly authenticated and is the location of the original evidence indicated?	X		
e. Are descriptions or diagrams included of locations visited by the investigating officer or board (para 3-6b, AR 15-6)?			X
f. Is each written stipulation attached as an exhibit and is each oral stipulation either reduced to writing and made an exhibit or recorded in a verbatim record?	X		
g. If official notice of any matter was taken over the objection of a respondent or counsel, is a statement of the matter of which official notice was taken attached as an exhibit (para 3-16d, AR 15-6)?			X
3 Was a quorum present when the board voted on findings and recommendations (paras 4-1 and 5-2b, AR 15-6)?		X	
B. COMPLETE ONLY FOR FORMAL BOARD PROCEEDINGS (Chapter 5, AR 15-6)			
4 At the initial session, did the recorder read, or determine that all participants had read, the letter of appointment (para 5-3b, AR 15-6)?			
5 Was a quorum present at every session of the board (para 5-2b, AR 15-6)?			
6 Was each absence of any member properly excused (para 5-2a, AR 15-6)?			
7 Were members, witnesses, reporter, and interpreter sworn, if required (para 3-1, AR 15-6)?			
8 If any members who voted on findings or recommendations were not present when the board received some evidence, does the inclosure describe how they familiarized themselves with that evidence (para 5-2d, AR 15-6)?			
C. COMPLETE ONLY IF A RESPONDENT WAS DESIGNATED (Section II, Chapter 5, AR 15-6)			
9 Notice to respondents (para 5-5, AR 15-6):			
a. Is the method and date of delivery to the respondent indicated on each letter of notification?			
b. Was the date of delivery at least five working days prior to the first session of the board?			
c. Does each letter of notification indicate —			
(1) the date, hour, and place of the first session of the board concerning that respondent?			
(2) the matter to be investigated, including specific allegations against the respondent, if any?			
(3) the respondent's rights with regard to counsel?			
(4) the name and address of each witness expected to be called by the recorder?			
(5) the respondent's rights to be present, present evidence, and call witnesses?			
d. Was the respondent provided a copy of all unclassified documents in the case file?			
e. If there were relevant classified materials, were the respondent and his counsel given access and an opportunity to examine them?			
10 If any respondent was designated after the proceedings began (or otherwise was absent during part of the proceedings):			
a. Was he properly notified (para 5-5, AR 15-6)?			
b. Was record of proceedings and evidence received in his absence made available for examination by him and his counsel (para 5-4, AR 15-6)?			
11 Counsel (para 5-6, AR 15-6):			
a. Was each respondent represented by counsel?			
Name and business address of counsel:			
(If counsel is a lawyer, check here <input type="checkbox"/>)			
b. Was respondent's counsel present at all open sessions of the board relating to that respondent?			
c. If military counsel was requested but not made available, is a copy (or, if oral, a summary) of the request and the action taken on it included in the report (para 5-6b, AR 15-6)?			
12 If the respondent challenged the legal advisor or any voting member for lack of impartiality (para 5-7, AR 15-6):			
a. Was the challenge properly denied and by the appropriate officer?			
b. Did each member successfully challenged cease to participate in the proceedings?			
13 Was the respondent given an opportunity to (para 5-8a, AR 15-6):			
a. Be present with his counsel at all open sessions of the board which deal with any matter which concerns that respondent?			
b. Examine and object to the introduction of real and documentary evidence, including written statements?			
c. Object to the testimony of witnesses and cross-examine witnesses other than his own?			
d. Call witnesses and otherwise introduce evidence?			
e. Testify as a witness?			
f. Make or have his counsel make a final statement or argument (para 5-9, AR 15-6)?			
14 If requested, did the recorder assist the respondent in obtaining evidence in possession of the Government and in arranging for the presence of witnesses (para 5-8b, AR 15-6)?			
15 Are all of the respondent's requests and objections which were denied indicated in the report of proceedings or in an inclosure or exhibit to it (para 5-11, AR 15-6)?			

FOOTNOTES: 1/ Explain all negative answers on an attached sheet.
2/ Use of the N/A column constitutes a positive representation that the circumstances described in the question did not occur in this investigation or board.

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REPORT OF PROCEEDINGS BY INVESTIGATING OFFICER/BOARD OF OFFICERS

For use of this form, see AR 15-6; the proponent agency is OTJAG.

IF MORE SPACE IS REQUIRED IN FILLING OUT ANY PORTION OF THIS FORM, ATTACH ADDITIONAL SHEETS

SECTION I - APPOINTMENT

Appointed by [REDACTED] ^{b6} LTC, Director of Logistics, EAST-LS
(Appointing authority)

on 20 April 1988 (Date) (Attach inclosure 1: Letter of appointment or summary of oral appointment data.) (See para 3-15, AR 15-6.)

SECTION II - SESSIONS

The (investigation) (board) commenced at MSC-K, Camp Carroll (Place) at 0800 hrs (Time)

on 8 June 1988 (Date) (If a formal board met for more than one session, check here . Indicate in an inclosure the time each session began and ended, the place, persons present and absent, and explanation of absences, if any.) The following persons (members, respondents, counsel) were present: (After each name, indicate capacity, e.g., President, Recorder, Member, Legal Advisor.)

The following persons (members, respondents, counsel) were absent: (Include brief explanation of each absence.) (See paras 5-2 and 5-8a, AR 15-6.)

The (investigating officer) (board) finished gathering/hearing evidence at 1400 hrs (Time) on July 15, 1988 (Date)
and completed findings and recommendations at 1515 hrs (Time) on 10 August 1988 (Date)

SECTION III - CHECKLIST FOR PROCEEDINGS

A. COMPLETE IN ALL CASES

		YES	NO ^{1/}	NA ^{2/}
1	Inclosures (para 3-15, AR 15-6)			
Are the following inclosed and numbered consecutively with Roman numerals: (Attached in order listed)				
	a. The letter of appointment or a summary of oral appointment data?	X		
	b. Copy of notice to respondent, if any? (See item 9, below)		X	
	c. Other correspondence with respondent or counsel, if any?		X	
	d. All other written communications to or from the appointing authority?	X		
	e. Privacy Act Statements (Certificate, if statement provided orally)?			X
	f. Explanation by the investigating officer or board of any unusual delays, difficulties, irregularities, or other problems encountered (e.g., absence of material witnesses)?		X	
	g. Information as to sessions of a formal board not included on page 1 of this report?			X
	h. Any other significant papers (other than evidence) relating to administrative aspects of the investigation or board?	X		

^{1/}Explain all negative answers on an attached sheet.

^{2/}Use of the N/A column constitutes a positive representation that the circumstances described in the question did not occur in this investigation or board.

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2. SOFA:

a. ~~The Status of Forces Agreement states, individual members of the~~
~~US Armed Forces, civilian components, invited contractors and their~~
~~dependents are required by SOFA, Article 7, to respect the laws of the~~
~~Republic of Korea, Exhibit C. Republic of Korea established Environmental~~
~~Preservation Laws promulgated on 31 December 1977, Law Number 3078, under~~
~~the Ministry of Health and Social Affairs Office, Exhibit D.~~ The purpose
of the Environmental Preservation Laws are to prevent hazards to the
public health and sanitation due to air pollution, water pollution, soil
pollution, noise, vibration, or offensive odor, and preserve the
environment properly, thereby contributing to the improvement of the
national health. Under the Environment Preservation Law Articles, Article
2, paragraph 11 states, specified hazardous material shall mean such
substances which are likely to become harmful to the human health,
property, or to growing agricultural and fishery products, directly or
indirectly, as may be prescribed by the Ministry of Health and Social
Affairs Ordinance.

b. ~~According to EUSA SJA, Mr. [REDACTED] EUSA does not have to comply with~~
~~the Environmental Preservation Act of Korea, because it is not required by~~
~~the SOFA Agreement. However, the SOFA was signed in 1966 and at that~~
~~time pollution concerns and environmental preservation concerns were not~~
~~addressed by either party. With SOFA, EUSA has needs for the~~
~~ability to comply with SOFA in order to meet Korean environmental laws and EUSA~~
~~environmental compliance standards consistent with the spirit of the~~
~~SOFA.~~

c. Further research revealed a letter at Exhibit E, dated 4 November 1980, Subject: DOD Environmental Policy Concerning Pollution Abatement at Federal Facilities outside the United States. It states, pending revision of AR 200-1, dated 20 January 1978, Army activities located outside the United States, will conform to the DOD Policy in fulfilling environmental protection and enhancement. AR 200-1, dated 1981, para 1-8, Exhibit F requires Army activities to comply with the substantive pollution control standards of general applicability of the host country unless the SOFA provides otherwise. The US/ROK SOFA does not specifically address the matter of hazardous materiel, pollution control and disposal of hazardous waste.

~~Therefore EUSA is required (by DOD policy and Army regulations rather than the SOFA itself) to comply with substantive ROK law dealing with environmental standards of general applicability. This includes handling, disposal, storage, and management of hazardous materiel and hazardous waste disposal. From this it would seem logical for EUSA to establish policy outlining responsibilities, procedures, and standards for the systemic control and monitoring of the identification, the collection, preparation, separation, storage, processing, recovery, treatment, and management of hazardous materiel. This regulatory guidance must apply to active Army and all tenant or supported installations at all times or sites under the temporary or permanent jurisdiction of EUSA. Active regulatory guidance has not been published by EUSA.~~

3. Hazardous materiel, toxic chemicals and hazardous waste management is not new to EUSA or to Camp Carroll, Korea. ~~Search of records and files~~

~~An A-576 investigation was conducted on the contents of a handout as~~

Camp Carroll, Korea, prior to 23 July 1980. A letter provided by EUSA SJA Office recommended an AR 15-6 investigation directing and fixing the blame, or assessing liability on the burial of hazardous materiel and hazardous waste at Camp Carroll be terminated. The EUSA SJA Office recommended the AR 15-6 investigation be continued at the specialist and technician level in order to develop more facts and make specific recommendations to prevent such a recurrence and to establish policy and directives to prevent a recurrence. The IG/Staff Judge Advocate, comments to the AR 15-6 investigation are the only documents that could be located Exhibit G. SJA's states: this was a disturbing case because of hindsight, it is not easy to see how a large operation such as EUSA could have permitted such a dumping of hazardous materiel and hazardous waste to have occurred in Korea. There were many people, offices, and organizations involved over several years in this matter. The investigation substantiated various chemicals were deposited at Camp Carroll after the Korean war and that more were brought there after Viet Nam. The storage and disposal of hazardous materiel and hazardous waste of hundreds of drums and other containers was a perennial problem. Current concern should focus on removal of chemicals from Area 41 and burial at Area 'D' at Camp Carroll. Approximately 6100 cubic feet of 148

different types of hazardous chemicals weighing 300 tons were buried in
[REDACTED] Exhibit G. This was part of a much larger and ponderous problem to
[REDACTED] problem to resolve the existing EUSA laboratory storage situation. SJA
[REDACTED] states perhaps poor decisions were made and everybody was involved about
[REDACTED] EUSA on down. SJA recommended the investigation report on the [REDACTED]
[REDACTED] want to prevent this from happening again. [REDACTED]
[REDACTED] same. From this point the investigation of [REDACTED] substantiate

11. EUSA published policy or guidance to subordinates for effective management control of hazardous material and hazardous waste. Further, it could not be determined if staff responsibility for providing hazardous material policy for implementation was directed. However it was recommended by EUSA SJA, the J4 be assigned responsibility and proponent for the management of hazardous material and hazardous waste. The whole issue seems to have died, but the point to make is EUSA had the initiative and momentum to fix hazardous material problems. EUSA did in fact clean up the landfills at Camp Carroll. However, I could not substantiate if the contaminated soil from Areas 41 & D were removed and properly buried.

4. Other Official Reports:

a. A US Army Environmental Hygiene Agency from Aberdeen conducted a survey on EUSA Hazardous Waste Management from 14 to 30 October 1985. The report was published by the US Army Environmental Hygiene Agency on 9 April 1986. Exhibit H indicates the report was distributed through Health Services Command (HSC) channels to the EUSA Surgeon's Office. The purpose of the survey was to evaluate EUSA's handling, storage, transport, disposal, and recycling of hazardous waste and hazardous material in Korea. The Executive Summary concluded that EUSA needs to develop a policy on the management of hazardous material and hazardous waste handled by US Army operations in Korea. That EUSA develop and implement uniform regulations for the management of hazardous material and hazardous waste handled by US Army operations in Korea. That EUSA establish and maintain the responsibility for the overall management of hazardous material and hazardous waste handled by US Army operations in Korea. That EUSA develop and implement contingency plans for the prevention of

and response to a sudden and non-sudden release of hazardous materiel and hazardous waste at each installation. That EUSA develop and implement a comprehensive training program based on established policy and regulations of EUSA. This report was found in a file at 5th Preventive Medicine Detachment, 19th SUPCOM, Camp Walker, Korea. During the course of the investigation (I could not substantiate a reply of corrective action. Further, I could not substantiate anyone having seen this report at EUSA or 19th SUPCOM staff, Inspector General, Internal Review, the DEH, FEAK, HOS, J-4 staffs, except 5th Preventive Medicine. Further, I could not substantiate any follow-up to this report done by the US Environmental Hygiene Agency. The US Army Environmental Hygiene Agency reports as damaging to EUSA.

b. During the course of the investigation, I discovered a survey by the US Army, Pacific Environmental Health Engineering Agency. The title is Waste Management Practices Survey at Camp Carroll, Waegon POL Site, Salem Base, and Salem Top, Korea, 5 - 16 May 1986. Exhibit 1. The purpose of the survey was to evaluate solid waste management, petroleum oil lubricants storage and handling, waste POL storage and disposal, and hazardous materiel/hazardous waste management practices. This report was finalized on 31 December 1986 and distributed through Health Services Command (HSC) channels as well as a copy furnished to 19th Support Command, US Army MSC-K, Camp Carroll on 31 December 1986. I could not substantiate 19th Support chain of command or MSC-K receiving this report in 1986. This report was forwarded to the Commander, Camp Carroll, HSC for a reply of corrective action on 26 January 1989. Two days later the

report was finalized. The Commander, Camp Carroll provided copies to his activities and stated in para 1, "the enclosed survey is provided for your immediate action. This is a very important area that has generally been ignored in Korea in the past." He stated, "these days are gone." Since, two in-progress reviews and corrective actions are still being worked. The Commander, Camp Carroll, is conducting quarterly reviews until all the findings of the report are resolved and corrected.

c. The surveys on hazardous materiel and hazardous waste management practices in Korea are not being directed through USA command channels. Both the surveys indicate potential harm to personnel and the environment. All more importantly similar conditions may exist elsewhere within the command. The inspection reports have valid points applicable to small installations that may have, or manage hazardous materiel and hazardous waste. Little has been done in terms of analyzing these reports, and setting priorities to fix hazardous materiel problems. A focal point is needed.

d. Another example is a Camp Carroll Survey, Industrial Hygiene Study, ~~UNITED STATES~~ of the Heavy Equipment Division. The medical report points to unusual high lead blood levels in welders who were operating equipment in confined spaces, performing welding operations of metals containing lead and welding metals that contained a lead coated paint. Personnel were observed performing the welding operations without the proper exhaust or ventilating systems, and in this case, without the use of air respirators or respirators approved by the US Bureau of Mines. I could not track the

report and actions of medical personnel through the dispensary at Camp Carroll. During an interview with the two OSHA nurses they were unaware this Industrial Hygiene Study existed. However, this report was at the command group level, the Camp Carroll Headquarters. Management steps are required to place these welders in a medical monitoring program and to assure safety standards are met in accordance with Title 29 and Occupational Safety and Health Administration Regulations. Again, the investigating officer could not substantiate a copy of corrective action to resolve the issues of the report. Project 56-92-02-08-86 dated February 1987.

5. As a result of the US Army Environmental Hygiene Agency, EUSA Hazardous Waste Management Survey, discussed in (para 4. a.) a letter was prepared, 11 Feb 1986, Exhibit K by 5th Preventive Medicine requesting assistance in developing an EUSA Hazardous Materiel/Hazardous Waste Plan. The US Army Environmental Hygiene Agency at Aberdeen Proving Grounds, MD provided EUSA a draft Hazardous Materiel/Hazardous Waste Management Plan, dated 20 October 1986. Records indicate 5th Preventive Medicine forwarded the plan to the FEAK Engineers for further analysis review and adoption.

It looks like the FEAK Agency did little to modify the original plan with intentions to adopt it as the EUSA Hazardous Waste Management Program in October 1987. Exhibit K 12 months after the draft was provided by Aberdeen Proving Grounds.

Further, DF's indicate the draft EUSA Hazardous Waste Management Program was forwarded for information to several agencies IAW AR 420-47 and AR 200-1. The purpose was to organize an EUSA Hazardous Materiel and Hazardous Waste Management Board for implementation of the

draft plan. This board was chaired by the FEAK Commander to develop, coordinate and evaluate EUSA Environmental Policy. The board would meet at least annually and consist of the following members as a minimum; FEAK, J-1 Rep, J-4 Rep, the EUSA Surgeon, the DRMO and DEH representatives. The point of contact for the draft EUSA Plan was a Mr. [REDACTED] ^{b6} assigned to FEAK as an Environmental Engineer. He has since departed this command. Another DF dated 30 October 1987, Exhibit K, stated, an Area Hazardous Materiel/Hazardous Waste Management Board would be established. The board membership was to consist of, but not limited to the following; Commanders of installations, DEH/DFE, area environmental coordinators, area medical or preventive medicine officers, area fire chiefs, area safety officer, chief installation transportation unit, logistics officer, director, industrial operations, local property disposal officer, and a representative from each activity generating hazardous materiel or hazardous waste. The function of this board was to plan, resolve, and coordinate area hazardous materiel and hazardous waste management programs. The DF stated, the area environmental coordinator be nominated to the EUSA Hazardous Management Board. The area environmental coordinator will write an Area Hazardous Materiel and Hazardous Waste Management Plan with support from appropriate installation personnel. The plan was to contain the following as a minimum; hazardous materiel management survey, identification of hazardous materiel and hazardous waste, inventory and tracking procedures, a storage inspection plan, a waste analysis plan, hazardous materiel and hazardous waste SOPs, a training plan, a spill prevention control and countermeasure plan, an installation spill contingency plan, local transportation procedures for

hazardous materiel and hazardous waste and storage, treatment and disposal facilities standards. The effort from this point on seems to have diminished with a weak attempt to establish a Hazardous Materiel and Hazardous Waste Management Plan for RUSA. This can be contributed to the lack of manning and establishment of environmental management offices/structure so the objectives of the program were never met and RUSA policy was not established.

6. Another document a Fact Sheet, dated 24 March 1987, unsigned by the RUSA Surgeon, Exhibit L, expounds on the problem. It identifies a transformer problem in the vicinity of the Yongsan Commissary and spill of an oily substance on the concrete pad and in the surrounding area. The spill was alleged to be suspected PCB, Polychlorinated Biphenyls Compounds. The workers replacing the transformer were without any protective clothing or equipment and apparently the transformer replaced had not been tested for PCB contamination. As a result, 5th Preventive Medicine Unit looked into the matter and the following information was provided to FEAK. 5th Preventive Medicine stated that USA Pacific Environmental and Health Engineering Agency developed a draft plan and submitted it to FEAK in October 1986, as yet, it had not been finalized. That a uniform regulation for the management of hazardous materiel and hazardous waste has not been developed or implemented. The responsibilities for the overall management of hazardous materiel and hazardous waste have not been developed or delegated for US Army, Korea. Contingency plans for the prevention and response to unplanned release or spill of hazardous materiel or hazardous waste have not been developed.

There is no training program for personnel managing or handling hazardous waste or hazardous materiel. In following up, I talked to a Mr. [REDACTED] b6 EUSA, FEAK, who is assigned to the Engineer Directorate, Utilities Division, stated, "the PCB or suspected PCB had been cleaned up in the vicinity of the Yongsan Commissary, however, he could not substantiate if the transformer had been tested for PCB." He further stated, "he had no information on the workers who handled the PCB or the transformer containing the suspected PCB." He was uncertain if the workers had been medically screened or had been advised of the possible hazards to their health of PCB contaminants. Again, in March 1987, there was a clear

indication responsible offices were reminded of work required in the establishment of a Hazardous Materiel and Hazardous Waste Management Plan for Korea.

7. An interview with 19th SUPCOM DEH, Internal Review and the sub DEH at Camp Carroll, indicated they had not seen policy on EUSA Hazardous Material Management Program. [REDACTED] b6 he stated, "his office had responsibility however, they were just in the development stages of an EUSA Environmental Program including an EUSA Hazardous Waste and Hazardous Materiel Management Plan." I asked him if there was an EUSA Hazardous Waste and Hazardous Materiel Management Program in place, [REDACTED] implemented by EUSA and his answer was, "no, there was not."

8. I checked with EUSA Internal Review office to determine if the command had received any AAA Audit Reports on toxic and hazardous materiel and hazardous waste. It was found that since January 1984, the US Army Audit

Agency (AAA) had issued four audit reports covering toxic and hazardous materiel and hazardous waste. ~~The purpose of these advisory reports is to identify problems, provide pertinent facts in areas that warrant special interest and to provide checklists to assist commanders and their staffs.~~ The EUSA Internal Review Office had on file a hazardous material advisory report, SO 85-A1 Exhibit M. However, this was not disseminated because ~~agencies have to ask for the report before a copy is provided.~~ In review of the SO85-A1 Report, it has valid points on the management and planning for a Master Environmental Plan including hazardous materiel and hazardous waste. It covers radioactive items of supply, biological and radioactive waste, management of transformers, toxic chemicals, and the purpose for identification, inspection, labeling, storage, inventory, and disposition of hazardous materiel. It states the purpose for identifying the environmental and program resource requirements, also the training that should be provided to unit and activity personnel who deal with toxic and hazardous materiel and hazardous waste are discussed. The report references the Army policies and procedures that are prescribed in Army regulations across the spectrum of the staffs. It is a good report and one that should be disseminated to subordinate commands and used as a starting point to establish a hazardous materiel and hazardous waste program for EUSA.

9. Area III DEH, LTC ~~██████████~~^{bb} office was contacted. I spoke to the acting Deputy, Mr. ~~██████████~~^{bb} the Utilities Division Chief under DEH, Yongsan. ~~He stated, "I know our work needs to be done in the area of hazardous materiel and hazardous waste management and I know and Yongsan."~~ He stated, "they had just put a plan together and intended to

hold their first meeting in July of this year." He stated, "a EUSA focal point is needed for installation DEH's to come for problems relating to hazardous waste or identification of hazardous materiel." He felt this area deserves a lot of attention and that EUSA should assign an Environmental Engineer or an Environmental Coordinator. He stated, "the business of hazardous materiel and hazardous waste clearly indicates the need for more effective management, control, and coordination of an overall EUSA program." "There are many problems in the disposal of hazardous waste and hazardous materiel that local DEH's are faced with." He further stated, "with the industrialization process ongoing in Korea and new emphasis on the Korean environment this creates a need for a EUSA focal point, and certainly one of increased monitor-ship." Mr. [REDACTED] b6 stated, "it is a necessity that an environmental coordinator and an office be established at each installation to ensure the proper use and management of toxic materiel and hazardous waste." He felt that the DEH at Yongsan, Area III, was into the infancy stage of environmental awareness and training aspects of hazardous materiel and hazardous waste.

10. ~~The investigating officer could not substantiate an EUSA organization responsible for effective control, coordination, and monitor-ship of an environmental program essential to accomplish the Army goal of a safe environment protection and enhancement.~~ If nothing else EUSA has a moral obligation being aware of the dangers of hazardous and toxic chemicals as regulated under Federal, State, and Congressional laws in the United States. Certainly command emphasis is needed on what type of EUSA

Environmental Program be established in Korea to meet the minimum standards required by Army Regulations and the environmental standards of the Republic of Korea. Across EUSA, 19th SUPCOM, and the command staffs at Camp Carroll, it became evident that no single agency is in charge of an Environmental Program including the management of hazardous materiel and hazardous waste in Korea. There appears to be a lot of internal staff debate on whether it should be 3-4 Transportation, DEHs, the EUSA Safety Office, or 5th the Preventive Medicine to take the lead and publish policy on the management of hazardous waste and hazardous materiel. This, I believe, has resulted in little or no policy.

15. Research indicates that AR 5-3 Exhibit A, dated November 1986 clearly outlines the Directorate of Engineering and Housing Agency responsible for hazardous materiel and hazardous waste management. Under the Directorate of Engineering and Housing (DEH), an organization should exist called the Environmental Management Office. This organization manages an Environmental Program and will typically have the following functions; a. It will operate pollution abatement programs (such as air, water, noise). b. It will manage hazardous materiel and toxic materials/waste programs. c. It will serve as a focal point for coordination management of hazardous materiel and hazardous waste. d. It will manage oil and hazardous materiel spill management. It states, if at an installation or at an organization where the population served is less than 2,000 or where there is minimal environmental workload, you may find the Environmental Office combined, normally, with the Engineering Plans and Services Division. AR 5-3 clearly sets down the function under the auspices of the Environmental Management Office to be responsible for managing hazardous

materiel and toxic materiel/waste management. In the discharge of those functions it is also clear that FEAK should become the policy center for EUSA. In review of EUSA USFK 10-1, Organizations and Functions, you will not find those functions indicated under the FEAK or ACofS, Engineer, EUSA.

16. As you break down management responsibility for hazardous materiel, hazardous waste, the complexities come in focus. Exhibit 10, Safety Installation Commander under AR 200-2, the Radiation Protection Officer under the D-4, Hazardous Materiel and Hazardous Waste Program under DEH, Preventive Medicine, Fire Prevention and Fire Protection Response Teams under DEH, Transportation Requirements under the D-4, and the Central Disposal Area Office under the DRMO all have a slice in management of toxic and hazardous materiel and hazardous waste. Considering the magnitude of the different Army Regulations, DOD requirements, Federal Regulations, National Fire Codes, and the current decentralization of operations, effective control and monitor ship by a single EUSA staff office is imperative. An integrated and coordinated approach to the issues dealing with the management of hazardous materiel and hazardous waste can only be brought about by command emphasis. I've heard

arguments that Korea has not focused a nation's attention on the health and environmental affects of toxic and hazardous materiel and hazardous waste. Therefore some believe that EUSA should not be concerned. Others will tell you that hazardous materiel and hazardous waste is in a stage of infancy in Korea when compared to the requirements of other foreign countries such as Germany, Japan, and in the United States.

In arguments to all of this, EUSA has a moral obligation stemming from what was learned in the 1970's and early 1980's, based on popular concern about the potential risk of industrial chemicals, hazardous materiel and hazardous waste. Realization that some of those substances, used or released randomly or carelessly, pose serious health hazards and have significant harmful affects on the surrounding environment should be enough.

17. Organizational Structure:

EUSA Internal Review needs to look at REAK and determine if it is properly staffed with the right expertise to establish appropriate hazardous management plans/programs under AR 200-1 and AR 420-474. This applies to subordinate DEH's. During establishment of Environmental Management Offices concurrently look at Korean environmental standards, laws, Army Regulation as it applies to hazardous materiel management. The EUSA Environmental Management Office serving as the focal point can pull along other staff agencies in a coordinated and integrated effort.

However without the proper manning EUSA will not succeed in the management of many and varied plans required for toxic and hazardous materials and wastes. Some of these are the Master Environmental Plan, Waste Analysis Plan, Spill Prevention Control and Countermeasures Plan, Installation Spill Contingency Plan, and others.

18. MEC-K - HAZARDOUS MATERIAL

a. Investigating officer was able to substantiate a partial list of types of toxic and hazardous material stored at Camp Carroll assembled by the Safety Office, Mr. [REDACTED] ^{b6} The OSHA Nurses at the Camp Carroll dispensary did not have a complete list of toxic and hazardous material that employees come in contact with. The Camp Carroll Fire Department had an incomplete list of hazardous material stored at MSC-K. This also applies to 19th Support Command, DEH. ~~More emphasis is needed on the establishment of safeguards and contingency plans for minimizing danger to health and environment in the event of a fire, or explosion, or some other type of a disaster that could occur.~~

b. I could not substantiate that a Waste Analysis Plan existed at Camp Carroll, 19th SUPCOM, AR 420-47. (Each installation activity hazardous waste or hazardous material must have) a plan that thoroughly analyzes: (a). The types of hazardous material and hazardous waste at the installation/activity, (b). The properties of such hazardous material and hazardous waste, so that appropriate measures and procedures can be employed to handle, store, and dispose of hazardous substances. (c). Training requirements essential for ensuring that personnel are aware of and are capable of safely dealing with hazardous material and hazardous waste. Although not required, I believe the plan should provide for periodic testing of areas, for example, soil and water surrounding facilities used for storage and disposal of hazardous material and hazardous waste.

c. I could not find evidence of a Spill Prevention Control and Countermeasure Plan at Camp Carroll and 19th SUPCOM. As a minimum AR 200-1 prescribes that the Spill Prevention Control and Countermeasures Plan contain; (a). An inventory list of storage, handling, and transfer facilities for which a reasonable possibility exists for a significant discharge of oil, chemicals, or other hazardous materiel and hazardous waste in harmful quantities. (b). A prediction of the direction, rate of flow, and total quantity that could be discharged as a result of a catastrophe or a major equipment failure. (c). A detailed description of equipment and countermeasures, including structures and equipment for diversion and containment of discharges for each listed site. (d). A description of deficiencies at each listed site including corrective measures required and procedures to be followed to correct the deficiencies. (e). Written operating procedures, inspections and record keeping requirements.

d. I did not find any evidence of an Installation Spill Contingency Plan at 19th SUPCOM or at Camp Carroll, except for a Chlorine Spill Plan developed by the Director of S & T, coordinated with the Fire Department and safety personnel at Camp Carroll. Chapter 8, AR 200-1, directs all installations to have an Installation Spill Contingency Plan and stipulates the minimum contents of the plan. This plan is basically used to clean up the discharges or spills of oil, chemicals, other hazardous substances. It is applicable for any installation with the capability to release hazardous materiel or substances in quantities that may be harmful to the environment and personnel. As a minimum, AR 200-1, prescribes that

an Installation Spill Contingency Plan contain the name, responsibilities, and duties of the installation on scene coordinator as designated by the Installation Commander. It specifies the composition and training plans of an installation response team. It also includes the names, positions, telephone numbers and addresses of key contact people and other key organizations and agencies to be notified of a chemical or hazardous waste materiel spill. It provides surveillance procedures for the early detection of hazardous substance spill. AR 200-1 requires this plan to be reevaluated and updated every three years and tested annually to ensure a timely and effective response is made in case of an accidental spill of toxic or hazardous chemicals.

e. Evidence in statements and interviews Exhibit, F substantiates the MSC-K Deputy Community Commander, Safety, Director of Supply and Transportation, DEH/DFE, 5th FM and the Transportation Division Chief, were not aware of any requirement for the plans just discussed. MSC-K Safety Office is trying to develop assessments on the types of hazardous materiel and hazardous waste generated at Camp Carroll. They plan to assign a hazardous rating by developing safety data sheets, descriptions, characteristics, and dangers associated with on-hand hazardous materiel and hazardous waste.

19. Inspections:

[REDACTED]

[REDACTED]

[REDACTED]

~~community~~ A case in point, the large storage Warehouse Six at Camp Carroll contains all water fire extinguishers without regard to the types of oxidizers, corrosive agents, acids, and other chemicals which are incompatible with water. Safety and fire inspections are being done without considering the chemicals, and hazardous materiel stored in a building. Again MSC-K warehouse operators and the first line supervisors were not well versed in the incompatibility aspects of storing hazardous materiel/chemicals or what could occur if you had an accidental mixture by breakage or leakage of incompatible chemicals and what types of violent reactions may occur. ~~It is necessary to do a better job of educating the workforce that handle, manage, and store hazardous materials and hazardous waste. The lack of an MSC-K industrial hygienist, OSHA union worker training, safety personnel trained in hazardous materials and hazardous waste business contributes to the lack of knowledge found in the workforce.~~

20. ~~_____~~^{bb} TRANSPORTATION DIVISION CHIEF, MSC-K

a. Mr. ~~_____~~^{bb} qualifications. ~~_____~~^{bb} from the statements of ~~_____~~^{bb}

~~_____~~^{bb} ~~_____~~^{bb} ~~_____~~^{bb} and interview with COL Wheeler, ~~_____~~^{bb}

~~_____~~^{bb} was recommended to serve as the Chief, Transportation

Division, GS-13 position, titled, Traffic Manager, under the Directorate

Supply and Transportation, MSC-K, Camp Carroll. He was responsible for

the program management and coordinating functions relative to receipt,

packaging/unpacking, and shipment of materials IAW current

regulations/policies and procedures relative to transportation traffic management. Part of his major duties was acting as the technical advisory service pertaining to traffic management in and out of Camp Carroll, military customs regulations and the shipment of hazardous commodities. He was to exercise staff supervision through subordinate supervisors engaged in the preparation and processing of documents and incidents to the movement and receipt of freight, the preparation of statistical and analytical reports, charts, and graphs reflecting the transportation workload, tonnage, future workload program and establish priorities. Also Mr Brown served as the radiological control officer IAW regulations concerning receipt, storage, and shipment cycle. One aspect of the job was responsibility to formulate training plans for assigned employees and provide for OJT and cross-training on the job. [REDACTED] b6

[REDACTED] Description, Exhibit Q

b. The Director, Supply and Transportation, Major [REDACTED] stated, Mr. [REDACTED] b6 supervised 89 employees, the majority of which were Korean National employees, KGS's in the transportation field, a Department of the Army Civilian (DAC), and a number of active duty military, 88N series MOS, Movement Specialists. Statements by MAJ [REDACTED] b6 and Mr. [REDACTED] b6 the current Transportation Div Chief, Exhibit, P, the organizational manpower authorizations are adequate to meet the mission requirements, except for surge periods common in support of Team Spirit or other major joint/combined exercises within the Republic of Korea. However, extended work week and funding is able to take care of any shipping surges.

c. What type of manager was Mr. [REDACTED] It became very apparent during the interviews with KN employees, DAC employees KN supervisors several things seemed to dominate throughout each of the interviews. In summary there was a negative environment caused by Mr. [REDACTED] (a) A complete lack of communications between Mr. [REDACTED] his first line supervisors and KN employees and in part, a personality conflict existed with Mr. [REDACTED] his first line DAC supervisor. (b) Mr. [REDACTED] in many cases went directly to the work force and directed the work effort, bypassing his first line KN supervisors and DAC supervisor. (c) There was a lack of planning and consistent guidance to establish work priorities for the labor force. (d) Mr. [REDACTED] autocratic and authoritarian leadership style led to problems in mission accomplishment. (e) Mr. [REDACTED] used abrasive language directed either around or at employees and first line supervisors. (f) There is a lack of informal training, OJT training, and orientation training for newly assigned personnel as well as KN employees under the supervision of Mr. [REDACTED]. (g) Under Mr. [REDACTED] unrealistic training goals were set requiring KN employees to pass a technical DOT training course presented at Aberdeen Proving Grounds, MD. (h) Mr. [REDACTED] failed to establish long range goals to increase the effectiveness of the Transportation Division. (i) There is a lack of an awards system which supports achievement of the organization's mission as well as individual efforts in personal development and achievement. (j) Mr. [REDACTED] looked down upon the KN workforce. He can't manage people properly.

d. Communications:

(1) Statements by Mr. [REDACTED] Mr. [REDACTED] Mr. [REDACTED] b6 b6
LTC [REDACTED] MAJ [REDACTED] Mr. [REDACTED] SFC [REDACTED] Mr. [REDACTED] Mr. [REDACTED] b6 b6
[REDACTED] Mr. [REDACTED] Mr. [REDACTED] Exhibit P, Mr. [REDACTED] used one way b6 b6
communications, communications down [REDACTED] communication b6

technique to the workers was autocratic without feedback, directive in nature. "This is what I want you to do, I expect you to do it and there is no other way to do it except for my way." Communications down was at times not fully understood by the workforce and that lack of understanding did not result in purposeful actions in worker output. Mr. [REDACTED] one way street approach to communications caused problems within the workforce and how they felt about being unable to initiate and implement any change. The lack of communications did not encourage first line supervisors or the employees to participate more in decisions affecting them in accomplishing the daily workforce missions. However, the employees wanted to be heard in certain directed effort in the packing of hazardous materiel as well as other commodities shipped from MSC-K. As indicated in the statements of Korean national employees they countermanded Mr. [REDACTED] orders. Several times Mr. [REDACTED] directed the packing of hazardous materiels be added to fill a pallet and in cases where the KN's thought it was unsafe, they accepted Mr. [REDACTED] directive. However, when he left they packed it in a safe manner. From the testimony of Mr. [REDACTED], Korean employees and supervisors Appendix P, employees perceived Mr. [REDACTED] was not interested in their problems; Mr. [REDACTED] was out of touch with the employee values and

their concerns. Mr. [redacted] ^{b6} did not encourage suggestions, he was only directive in nature, "you do it my way, and if you don't do it my way, there was a fear of demotion, transfer, or being fired from the workforce." This management style lead to closed minds in the workforce.

There was certainly no evidence that Mr. [redacted] ^{b6} gave any worker encouragement for creative new ideas of how to accomplish the packing, loading, or unpacking and shipping of hazardous materiel or commodities from MSC-K. Mr. [redacted] ^{b6} failed to be a good listener which is a basic condition of two way communication. Later on employees were reluctant to speak freely for fear that they would be chastised, and in some cases

singled out by Mr. [redacted] ^{b6}. They KN supervisors viewed Mr. [redacted] ^{b6} as a man marked with an explosive personality evidenced by episodes of outburst of rage, aggression, and inability to control such outburst as witnessed by

Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, and Mr. [redacted] ^{b6}

Chon, Exhibit P. This down communications and lack of communications led to serious problems, conflict and criticism, and suppression, all in a very negative work environment managed by Mr. [redacted] ^{b6}.

(2). In the statements of Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, Mr. [redacted] ^{b6}, and petition Exhibit R, KN employees would greet Mr. [redacted] ^{b6} by the morning "Good morning, Sir, or good morning, there would be no response in

return." To the KN employees they didn't understand why Mr. [redacted] ^{b6} did this kind of thing, except to them it meant being looked down upon and indicated a disrespect. A petition signed by 59 KN, Subject: Protection of Human Rights, and complaints and grievances, Exhibit R, made against

Mr. [REDACTED] by the work force also bears out Mr. [REDACTED] mannerisms and the way employees perceived he treated them during his tenure as the Chief, Transportation Division. These were investigated and led to Mr. [REDACTED]

[REDACTED] removal from the workforce. There is a Memorandum of Agreement in the matter of employees grievances, signed on 31 August 1987

by Colonel Wheeler and Mr. [REDACTED] President of the Waegon Chapter, USFK, Korean Employment Union Exhibit S. The document states

Mr. [REDACTED] is still assigned to his current position and will continue to function as the Transportation Division Officer with the following

limitations: (a) He is not to take part in the personal administration of the Transportation Division (This includes leave approval, appraisals,

time cards, etc.) (b) He was not to deal with or pass any instructions to KN employees of the Transportation Division to include subordinate

supervisors. (c) Mr. [REDACTED] would provide instructions to the work force through an intermediary NCOIC, SFC [REDACTED] (d) He was not to enter, at

any time, the Transportation Division work area. Much of the down communications and the negative work environment was substantiated in an

AR 15-B investigation directed by COL Wheeler, MSC K Commander.

(3) Statements by Mr. [REDACTED] and supervisors substantiated that Mr. [REDACTED] on many occasions would go directly down to the workforce and redirect the work effort. Some of this may have been valid based on required delivery dates (RDD), and the destination of cargo. The item with the most imminent RDD will take priority over one that is 15 - 20 days later. Just the nature of the business, priority changes are generated each day.

especially in the Transportation Division. However, Mr. [REDACTED] ^{b6} did not go back to his first line supervisors and keep them abreast of the changes, either written or verbal, that he redirected. ~~By not informing first line supervisors it caused turmoil and confusion as to what were the priorities and how they were reset for the day's work effort.~~

(4) In the statements by Mr. [REDACTED] ^{b6}, Mr. [REDACTED] ^{b6}, Mr. [REDACTED] ^{b6} the frequent changes in the work schedules and the lack of guidance or reasons why the work schedules were changed were due again to the lack of communication between Mr. [REDACTED] ^{b6} and his first line KN supervisors and DAC supervisor. However, if there were adequate communications up and down the chain of command this influence of change is logical, based on changed priorities, availability of materiel, rail cars, pallets, or high priority shipments, such as a blue streak. Changes would have been reasonable if Mr. [REDACTED] ^{b6} had done this through his first line supervisors, giving them the mission, and letting them redirect the resources of people, materiel, and effort. Mr. [REDACTED] ^{b6} failure to exercise staff supervision through subordinate KN supervisors caused many of the problems in the Transportation Division. He failed to delegate transportation requirements redirecting the work effort from the supervisor level down. The chain of command principle is important in accomplishing the mission especially in a large diverse organization such as the Transportation Division.

e. Leadership:

(1) [redacted] leadership style is autocratic and authoritarian. This may stem from a military career and authoritarian leadership applied to a civilian workforce. His leadership can be described by conformity to unrealistic demands that he set, marked by worker fear under threats of demotion, transfer or firing. Autocratic leadership worked well for [redacted] because KN workforce feared him. Mr. [redacted] and SFC [redacted] Exhibit P stated, if [redacted] was challenged and people stood up to him, he then respected an individual whether it be a supervisor or an employee. However, in the Hangul mind set this did not happen, so James Brown was able to essentially run over the KN employees. They accepted this kind of abusive leadership because of personal obligations at home, respect for authority and the mere fact workers feared the loss of jobs. Also statements by Korean workers indicate they would be on the workforce a long time after [redacted] had departed the job.

(2) What was the state of morale under this type of leadership?

~~From statements of Korean national employees the morale of this workforce~~

~~was low~~ This set a stigma, the employees would do just exactly what Mr. [redacted] would tell them and no more. Mr. [redacted] used his power to demand, "you do this, or else," meaning to them that an employee will be penalized if he does not follow orders. To back this up Mr. [redacted] let employees know he had the power to fire, demote, transfer, prepare letters of admonition and that was his absolute power. Again, this type of leadership style shows itself in Mr. [redacted] directive that Korean National selectees for the DOT transportation formal school better pass

the course of instruction or else. In the cases where employees failed the course paperwork followed to OCF to have people transferred. When this happened they finally stood up in mass and said, "We basically have had enough of Mr. ██████████". When he threatened to transfer, demote, or remove KNs from the workforce, this was the driving force that caused the Korean National Employees to file a union labor grievance against Mr. ██████████ alleging mistreatment.

██████████ All KNs I interviewed stated they would never work for a manager like ██████████ because he was abusive, he was inconsiderate, failed to greet them, dictatorial, and a person marked with an explosive temper.

f. Abusive Language:

(1) Mr. ██████████ used abusive language around and directed at Korean National employees and his DAC supervisor substantiated in statements of Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, Mr. ██████████, SFC ██████████, Exhibit P, Mr. ██████████, Exhibit I stated he suspected Mr. ██████████ called Mr. ██████████ wife a whore in the commissary. He saw Mr. ██████████ leaving the commissary and Mr. ██████████ wife, a Korean National, approached him, and asked what a whore meant. When he explained to her, she became very upset. He stated Mr. ██████████ was angry went looking for Mr. ██████████ to kill him. Mr. ██████████ stated, he tried to find Mr. ██████████ but was unable to do so. He called Mr. ██████████ MSC-K Command Group to ask what he should do and Mr. ██████████ informed him to forget the incident, because Mr. ██████████

was leaving soon. Mr. [redacted] stated, he was able to calm down, regain his
composure and decided not to pursue the incident. Mr. [redacted] stated he

knew Mr. [redacted] wife and she speaks little English. In statements of Mr. [redacted]

[redacted] Mr. [redacted] Mr. [redacted] Mr. [redacted] Mr. [redacted]

[redacted] called Mr. [redacted] and others a "son of a bitch" and said

statements to them. If it was in my power, I would fire you from the work

force. A statement prepared by [redacted] Exhibit T dated 8

March 1986 describes the behavior of Mr. [redacted] towards Mr. [redacted] Mr.

[redacted] became noticeably agitated and loudly told Mr. [redacted] to the effect,

"Well, make a decision. You have a backlog in the shipping area, get your

people busy on the backlog and get your ass up from behind the desk and

get busy. Mr. [redacted] stated that Mr. [redacted] got up and explained to Mr.

[redacted] where his people were working and then departed the area. This

apparently happened in front of other workers. A memorandum for Record

signed by Major [redacted] counseling Mr. [redacted] is at Exhibit U. In a

statement Mr. [redacted] Exhibit P witnessed Mr. [redacted] hollaring and screaming

at Mr. [redacted] "I want you to get out there and find that fucking trash

truck and get that God damn trash out of here before noon." He stated,

Mr. [redacted] conduct was unprofessional, uncalled for in front of the

workforce. Mr. [redacted] called Mr. [redacted] abusive and derogatory names. A

statement dated 6 March 1987 Exhibit V was prepared by a SGM Reed the

Operations SGM of the Directorate, Supply and Transportation. He

overheard Mr. [redacted] threatening SFC [redacted] something about if one of the

soldiers or SFC [redacted] made any mistakes, that it would be reflected on

their EER and that they would not be considered for any type of end of

tour award.

(2) The Korean National employees that I interviewed substantiated that Mr. [REDACTED] used abusive language around the work place some of it directed at Korean National employees. At times the abusive language, and body motions indirectly indicated it was being directed to the Korean National employees. He consistently used such words as 'God damn, and bullshit' in conversation and to emphasize. This abusive language had an impact on the Korean National employees. It contributed to their resentment of Mr. [REDACTED] and to some degree towards a loss of motivation, self esteem and a sense of worthlessness. Their life at home with the family and the work place deteriorated because of the abusiveness. Some Korean National employees accepted this abusive behavior because they felt that Mr. [REDACTED] was a troubled individual, a war veteran that had experienced trauma by the loss of an arm and a severely disfigured burned face. Other Korean National Employees tolerated this treatment with reflected feelings of anxiety. Statement made by Mr. [REDACTED] Exhibit F, Mr. [REDACTED] was the type of individual that could be talking to you one minute and then suddenly change and become an explosive personality the next. In SFC [REDACTED] Officer Club Manager's statement it got to the point where the abusiveness not only passed on to the work force but to others as well who served the community. The warresses at the Officers Club refused to serve Mr. [REDACTED] apparently because of the abuse he was given and the extreme protection towards the warresses. The Club Manager investigated allegations and passed his comments on to LTC [REDACTED]. He said LTC [REDACTED] counseled Mr. [REDACTED] because Mr. [REDACTED] did not show up in the officers club for a period of two months. He stated Mr. [REDACTED] began to eat in the AAFES Snack Bar and only returned to the club, just prior to his departure.

task. This does not reflect good marks on his superiors and chain of command.

D. Congressional-Hazardous Material Training:

(1) Mr. [REDACTED] in a Congressional letter stated personnel processing hazardous materiel for shipping are required to satisfactorily complete training as required IAW Title 49, Code of Federal Regulations and TM #38-250, a course that must be geared toward preparation of hazardous materiel for military air shipment. Mr. [REDACTED] stated personnel are still processing hazardous materiel when they were unable to complete a formal DOTD school IAW Title 49, Code of Federal Regulations. Because personnel had failed the hazardous materiel course in the past, he prepared a SF 52 for two of the personnel to be reassigned from their present position into a position which requires less use of the English language and less technical skills. He states, the Korean employees learned of this they staged two sit down strikes in the work area and demanded that he be removed from the workforce.

(2) I want to discuss these statements, made by Mr. [REDACTED]. [REDACTED] states [REDACTED] responsible for formulating training plans for [REDACTED] employees and provide [REDACTED] and cross training on the job. It is then a management implied mission of establishing some type of training program within the workforce that deals

with the proficiency of the worker in his functions in the receipt, packaging, shipment, of hazardous materiel and hazardous cargo.

Statements from the workers indicate that under [redacted] there was no any OJT training, or a program of formalized training for employees. From the statements of Korean National Employees, they learned their job from other employees.

(3) A review of TM 38-250, I-20, and AR 55-355, para 33-7, Exhibit 66 indicates only certifying officials for hazardous cargo must be school formally trained. TM 38-250 indicates a number of courses that can be requested to satisfy this requirement. In this regard Mr. [redacted] letter is not entirely true as he states all personnel processing hazardous materiel must have satisfactorily completed one of the DQMP formal schools in order to be qualified to prepare, pack, and ship hazardous materiel.

(4) In 1986, Exhibit W, a school of military packing technology was taught by personnel from Aberdeen Proving Grounds, MD titled the Defense Packaging Hazardous Materiel for Transportation, on 30 Jul 86. Eleven KN employees did not satisfactorily complete the course.

and any evidence where Mr. [redacted] requested pre study materiel or any [redacted] the problems associated with the course [redacted] taught in English, not in hangul. American green suitors failed, the course. Again, without a management analysis on whether this was the right type of course to be taught to Korean National employees was again scheduled 27 Jul - 6 Aug 87 at Camp Carroll. Of 19 participants two satisfactorily completed the program of instruction (Exhibit W)

signed by the Civilian Personnel Office. The high failure rate caused the command to reevaluate selection, the course, and the needs of the command. Statement by Major [REDACTED] b6 Exhibit P. It was realized by the

chain of command this course was too technical and difficult and not tailored to the needs of the work force at MSC-K. This course was very difficult and covered more than was required by regulation to meet the unique needs of Korea. The students were being taught and tested in English, difficult if impossible to pass by a Korean. It was agreed by

MSC-K they needed to select a separate course, which in the long term would save money, meet the requirements of MSC-K in accordance with established regulations and increase the odds of successful completion of the students. At this time MSC-K was able to satellite off of the Shepherd Air Force Base, DOT course of instruction at Osan Air Base. As a result of this participation by MSC-K, six successfully passed the course. In my judgement, it was one of the duties of Mr. [REDACTED] b6

to ensure KN employees had a fair chance of passing whichever course they were selected to attend. I find no evidence Korean Nationals selected by Mr. [REDACTED] b6 received assistance and appropriate materials for pre-study. I find no evidence of time, money, skill development, or resources that were made available to the Korean National workforce to insure that they could had a fair chance of passing an English taught and written course presented by Aberdeen Proving Grounds, MD.

(5) For other employees who are not certifying officials, but work with hazardous materiel are required by TM 38-250 and AFR 71-4 to receive initial and annual refresher training.

The reg states this training will be designed for local units to teach and will be structured to include as a minimum familiarity with the following subjects: (a). DOT Hazardous classifications, (b). Marking, labels, play cards, and forms. (c). Packaging and handling. (d). Compatibility and other safety requirements. The regulations states that current records of individual's training must be maintained. Statements of MAJ [REDACTED] Mr. [REDACTED] LTC [REDACTED] Korean National Supervisors, to include Mr. [REDACTED] the training records were not kept. Training records are required by TM 38-250 and AFR 71-4, dating back to 6 Nov 81. [REDACTED]

~~MAJ [REDACTED] stated, training records were maintained on the Korean National workforce and his supervisors. SFC Tonsil stated, she cannot recall any kind of formal training or OJT that had taken place in the year that she had been assigned to MSC-K. Major [REDACTED] stated, training records were a requirement under the new TM 38-250 and AFR 71-4 published in 1988.~~

(6) Major [REDACTED] is looking into training and development programs for the Korean National employees work force. There are initiatives that are underway in selecting a trainer and a training manager for the workforce as well as looking at formal schools of instruction, structured OJT, and administration of training for the Korean National employees work force. Another initiative is to train the trainers, whereby KN personnel are selected to attend a formal DOT school of instruction then devote time to train employees of their divisions. However, training and training management aspect is supported by the chain of command as important to organizational improvement and development of the Korean National employees work force.

(7) Training the work force is a job description requirement of Mr. Brown. This was a primary responsibility of Mr. [REDACTED] to train the work force and I find no evidence (except formal school training) this occurred from within the organization during his tenure at MSC-K and as Chief of the Transportation Division. Organizational training for new employees as the job relates to handling of hazardous materiel, safety equipment, and health practices are important for new as well as seasoned employees. There is a need for Hangul translations to assist employees working with hazardous materiel, hazardous waste, and regulations. It's also important for some type of structured first aid training. Intergrated into this training plan certainly could be safety, fire prevention protection, and 5th Preventive Medicine classes. Again, a computer automated program of instruction for each category of employee can be developed.

H. Job Description of Employees:

Mr. [REDACTED] requirement to add the job description statement
incumbent must be knowledgeable in transportation of hazardous materials
and able to comply with Title 49, Code of Federal Regulations, other
regulations pertaining to shipping of dangerous and hazardous cargo
proper. However, the incumbent employee must be able to satisfactorily
complete a special qualifications training course in preparation
packaging and handling of hazardous materials for shipping. 49 CFR 171.305
Chapter 20, qualification of personnel, listing of job titles

Mr. [REDACTED] used this as the basis to remove a Mr. [REDACTED]
Shipping Clerk Supervisor, Mr. [REDACTED] Clerk, Outbound Branch,

Transportation Division as a means for transfer is without basis. Mr. [REDACTED]

[REDACTED] request for transfer of two employees has no merit because it was
b6
not a job description requirement. They are qualified to certify the DD Form
1687-2 for air shipment of hazardous cargo. Mr. [REDACTED] in his
b6

congressional letter stated, these employees could not read or comprehend
English to meet his needs. In fact, each of these employees were

individually tested and certified to a level of competence in the English
language as governed by CPO standards. A comfortable degree of competence
in English differs between a blue collar worker or a white collar worker
with English proficiency increasing as the grade level of the position
ascends. [REDACTED] initiated SF 52's to transfer the two Korean employees
b6
because they had failed the formal training provided in July 1986 and in
the hazardous materials course taught in August 1987. [REDACTED]

[REDACTED] statement, Mr. [REDACTED] intentions were not to transfer the two Korean
b6
National employees, but to fire them. Statements from both employees

support Mr. [REDACTED] position. Looking at the record of Mr. [REDACTED] he
b6
is an outstanding employee serving in a position of responsibility since
1966. His record indicates outstanding performance, letters of

commendation, recognition for 15 years of service and 20 years of
service. So, [REDACTED] record indicates a very outstanding performance
b6
since 1966. He has also completed other courses of instructions,

Supervisor Development Course, Instructor Training Course, a course taught
on the storage and warehouse operations and sails system, Conference
Leadership Course and many years of faithful and honorable service.

(4) In a statement by a SMSGT [redacted] responsible for processing all K-2 air shipments of hazardous cargo stated, he would not accept Korean employees as certifying officials on the - 2. Especially if a DA Civilian or qualified military was available to certify the - 2. Mr. [redacted] the Transportation Division Chief, and Major [redacted] the Directorate Chief, S & T, also stated, Exhibit P, they would not select a Korean employee to certify air shipments if a DAC and/or active duty military were available and qualified to certify the - 2.

(3) In my judgement, it's inconceivable and unrealistic for Mr. [redacted] to demand Korean employees pass a technical course of instruction taught only in English. I believe they could pass a technical course of instruction if taught in Hangul by Hangul instructors, and given pre-course study materials in Hangul. Mr. [redacted] did none of this. Not one of the DAC supervisors, U.S. military and or the U.S. chain of command accepted the challenge to pass the DOT formal course of instruction in Hangul. Mr. Brown didn't provide every opportunity for the Korean employees to be successful. The leadership should have assessed the failures noted in 1986 and the DOT course selection.

[redacted] statements from MSC of Korean employees indicate after failing Phase I of the formal course of instruction they were required to return to the workforce. They should have been allowed to continue Phase II, Phase III, and Phase IV. MSC paid \$10,000 for instruction and associated costs. [redacted] could have located employees for a training and development center which could have better improved the organizational ability of the workforce.

I. GOALS AND OBJECTIVES:

(1) I could not substantiate employee awareness of goals and objectives for 1986 - 1988. The workers stated one requirement was to process 500 MROs a day.

(2) Established Transportation Division goals and objectives can increase effectiveness and mission accomplishment. Goals can orient on people concerns, creating a sense of ownership of organizational objectives throughout the workforce. It can ease implementing changes more systematically for organizational development, including the work day priorities, required delivery dates (RDD), and upcoming surge periods caused by major exercises. Goals could be established to facilitate more systematic problem solving on the job. A goal to reward employees supports achievement of the organization's mission as well as individual efforts in personal development and achievement. Management must identify a training goal essential to the Transportation Division, in fulfilling its mission. Perhaps the Director S & T can look at a technical structured intervention goal which includes the modification of the work environment i.e., changing the physical arrangement of an office that may affect human interaction patterns, it may include changing a job description, and it may include the restructuring of an organization's branch because of a mission change. In interviews with the Director, S&T, the Transportation Division Chief, and the new Deputy Chief of S&T, they shared many good ideas on goal setting and how they contribute towards improving the working environment, professional and organizational development.

J. EMPLOYEE RECOGNITION:

Statements made by Mr. [REDACTED] and Korean National Supervisors, reflect the lack of management recognition for Korean employee contributions.

Employees basically felt a lack of recognition for mission achievements, the work effort, a much needed pat on the back once in a while. Hey, you did a good job during Team Spirit, you did a good job ensuring the planes were loaded and the shipment of cargo was on time. I reviewed the inbound workload, the short tons shipped, the number of lanes, tons processed and packaging requirements for FY 86 and FY 87. It is awesome and impressive. Exhibit X. Statements of Mr. [REDACTED] and chain of command, and my observations indicate employee dedication is there to accomplish the workload and especially during Team Spirit 88. Many employees gave unselfishly of their own time to see that the mission of the Transportation Division was accomplished in a timely manner. That doesn't mean that they do everything, everyday, perfectly, but they work hard for accomplishing the program management and the coordinating functions for the receipt, the packaging, and shipment of materials for the defense forces in Korea. The Transportation Division, MSC-K enjoys a good reputation with the 6th Support Center, 10th SUPCOM, 60th Transportation Battalion, and K-2 Air Base Cargo and Passenger manifest section. The workers are responsible for this perception.

K. SHIPMENT OF HAZARDOUS CARGO - Violations in the shipment of hazardous cargo

Mr. [redacted] made the statement in a letter addressed to the Director, Material Transportation Bureau, Congressmen and other formal outside agencies. During the past 8 years there have been hundreds of mistakes in the shipment of hazardous material, in Korea, COMUS and to other overseas areas. In reviewing Mr. [redacted]'s job description exhibit, [redacted] states, he is responsible for preparing material for shipment to include packaging, marking, hazard determination and labeling. He serves as the radiological control officer ensuring radioactive commodities are handled safely in accordance with regulations through the receipt, storage, and shipment cycle of those items. The incumbent is independently responsible for carrying out assigned responsibilities pertaining to transportation, traffic management IAW current regulations, policies, and procedures, referring only controversial major problems to be resolved at higher levels. In essence, as Chief of the Transportation Division he is solely responsible for accomplishing program management and coordinating functions relative to the receipt, packaging and safe shipment of hazard materials and commodities. [redacted] there were violations in shipments of hazardous material it was his responsibility as the Chief of Transportation Division to resolve those issues. [redacted] could not substantiate that Mr. [redacted] b6 [redacted] handled any problems or violations in the shipment of hazardous material to the 101st SUPCOM Staff, Commander Camp Carroll and MSU, USA. [redacted] Internal Review of [redacted] Safety of [redacted] Transportation [redacted] 8th Aeronautical Medicine, 6th Spl. Center, 69th Transport [redacted] Battalion, 12 Aer. [redacted] Pusan Water port, the DRMO at Pusan and [redacted] [redacted] If there were unresolved transportation problems during his

tenure as the Chief, Transportation Division, it was his responsibility to
fix or elevate those to higher level command. Statements from MSC-K
employees, 6th Spt Center, 69th Transportation Battalion Commander, the
K-2 Aerial Port, DRMO at Pusan and Camp Market does not support violation
allegations made by Mr. [REDACTED] b6

~~A review of documentation of MROs
and TCMDs doesn't support Mr. [REDACTED] allegations.~~ In statements of Major

[REDACTED] b6 the Directorate Chief, Deputy Director Mr. [REDACTED] Mr. [REDACTED] b6
Chief Transportation Division, I found no evidence to substantiate that
hazardous materiel is shipped in an unsafe manner. An exception to this
occurred in Sep-87 where MSC-K improperly shipped radioactive unhazardous
(9 wrist watches) directly to a private contractor, [REDACTED] Nuclear systems in
Snelling, SC. This violation was investigated by CDR MSC-K and the EUSA
Radiological Officer, Mr. [REDACTED] J-4. The primary investigating officer
looked at the facilities, shipment procedures, and incorporated the
necessary measures to ensure all regulatory requirements are satisfied
prior to a shipment of radioactive materials. In review of
documentation, air shipments of cargo from Jan 87 to Dec 87, there were
301 air shipments of cargo that passed through the aerial port at Taegu.

Fifty-one of those air shipments were hazardous cargo shipments. From Jan
88 to 4 Jun 88, there have been 30 air shipments of cargo out of country,
six of which are hazardous cargo shipments. Statements from Mr. [REDACTED] b6

Mr. [REDACTED] MAJ [REDACTED] Mr. [REDACTED] b6 and others Exhibit P, could only
recall two or three shipments of hazardous cargo rejected by the Air Force
in the last twelve months. All shipments of hazardous materiel that
depart MSC K are certified by qualified personnel on the DD Form 1387-2.

Personnel certifying the -2 shipment of hazardous cargo, are appointed on orders by the Commander, MSC-K. The Air Force at K-2, have valid signature cards on file used to verify -2 signatures. Statements of, LTC

~~██████████~~ SFC ~~██████████~~ Major ~~██████████~~ Mr. ~~██████████~~ and Mr. ~~██████████~~ substantiate a qualified person has always been available to certify the -2 for air shipment of hazardous cargo. However, in Aug 87, MSC-K had assigned one person qualified to certify -2. ~~Transportation Division now has six~~

~~people qualified to certify the -2 including the Chief, Shipping Branch and Chief, Transportation Division.~~ Statement by SSG ~~██████████~~ Customs

Inspector, personnel from Customs Branch are present during air shipment packing of hazardous materiel, and at no time has he or customs inspectors ever witnessed hazardous materiel packed in an unsafe matter. LTC ~~██████████~~

Battalion Commander and XO MAJ ~~██████████~~ 69th Trns En stated, they provide an NCOIC to the MSC-K Shipping Branch, during loading of tractor and trailers because the drivers are KATUSAs. The En XO stated,

accountability, proper loading, safety, cargo distribution, manifests are physically checked by the Operations NCO for each MSC-K line haul. He stated, there had been no serious problems in the shipment of hazardous cargo by tractor and trailer. Interview was conducted with the Air Force

at K-2 Air Base, a SMSGT ~~██████████~~ Chief, Passenger and Air Freight Terminal, Taegu. SMSGT ~~██████████~~ has served in that position for

~~██████████ and cannot recall correspondence or telephone contact with~~

~~██████████ CONUS or from the Air Force command regarding the~~

~~receipt of improperly packed hazardous materiel.~~

(2) There is a difference between MSC-K hazardous cargo shipments rejection rate (2 - 3 in the last 12 months) to SMSG [REDACTED] (an average of 7 hazardous cargo air shipments are returned out of 10). He states, the Air Force challenges every air shipment of hazardous cargo by inspecting the containers for regulatory packing, verify proper contents, and quantity of hazardous material packed in each container, ensuring it meets the specifications required by AFR 71.4. However, the Air Force does not document why a customer's air shipment is rejected. Their main mission is to instruct and provide technical expertise to customers ensuring air freight is safe. SMSG [REDACTED] majority of rejected MSC-K air shipment loads is because of paperwork. AFR 71.4 requires to be perfect, no strikeouts, erasures, or whiteouts. He stated, since MSC-K personnel have attended the Osan DOT instruction, air shipments have improved and felt that would continue. [REDACTED] stated, he did not care if 10 out of 10 air shipments were rejected as long as the shipments placed on an aircraft were safe, properly packaged without danger to the aircrew, the aircraft and passengers. His number one priority is to challenge every air load of freight to ensure that it meets the specifications in AFR 71.4. With this information, I inspected MSC-K records, DD forms 1384-2, Transportation Control and Movement Documents, Material Request Orders, DD forms 1380-1, and cannot substantiate why air shipments were returned from 12 to 16. Any nonopen paperwork is removed from the records destroyed and the corrected copies will in the Shipping Branch file. If its a problem with loads they are brought back to MSC-K repacked then transported for air

shipment. ~~There are no checks and balances to verify which loads were~~
~~rejected at the K-2 air base and on the other side of the coin there are~~
~~no records of air shipment rejections at K-2.~~ The Chief, Transportation
Division, Mr. [REDACTED] and the Directorate for S & T were unaware the Air
Force rejected 7 of 10 air shipments of hazardous cargo. They agreed
there should be a procedure to capture information as to why the shipments
of hazardous cargo were rejected. They felt it's important to identify
weaknesses and through a training program, correct the problems across the
workforce.

~~20) There is no reason to halt any shipments from Camp Carroll because~~
~~they meet the requirements in the packing and safe handling of hazardous~~
~~cargo required by TM 38-250 and AFR 71-4 for air shipments.~~ There is
nothing in the records to indicate concern generated by customers or
inspectors who have received hazardous cargo air shipments from Korea.
All cargo departing MSC-K by surface transportation is monitored by
personnel knowledgeable in handling and shipment of dangerous
commodities. Transportation control and movement documents are certified
by an authorized agent of the responsible transportation office.

21. Standards and criteria in the handling of hazardous material.

~~22) The review and coordination at USARPAC and JCSA Staffs should~~
~~be made that standards and management of hazardous material have been~~
~~inspected by all new level of the USARPAC and JCSA Staffs.~~ Thorough
programmed inspections of personnel, training, qualifications, safety

equipment, equipment to be used for detection, warning and control of hazards posed by storage of hazardous materiel, facilities, and transportation of hazardous materiel at least annually. This inspection

needs to be integrated and coordinated across the staffs of Safety, 5th Preventive Medicine, the OSHA Program, DEH, and U-2. The IG's have got to get involved.

The Safety Office, 19th SUPCOM, Camp Carroll, and EUSA as well as the 5th Preventive Medicine OSHA programs have responsibility to become more involved in health and safety training of military and civilian personnel handling hazardous materiel under the provisions of AR 385-10 and AR

40-5. In a letter by EUSA Safety to 19th SUPCOM Safety Management dated 23 June 1986, EUSA comments Exhibit Y, the training safety of military and civilian personnel at all levels is one of the stated functions of the 19th SUPCOM Safety Office. It recommended the 19th SUPCOM Safety Office determine the training needs, such as hazardous materiel, specialized occupations, occupational health, etc., facilitate the provision of such training. It recommended a starting point to be the OSHA general industry training requirements. Whenever possible, there was no follow up on this

EUSA recommendation. It seems to have died with an answer from the

Support Command Exhibit Y that hazardous materiel are considered to be a function

22. OSHA PROGRAM

(1) The OSHA, Occupational Safety and Health Act was signed into law on December 29, 1970, by President Nixon. The OSHA benefits manifest a substantial interest on a part of the public and Congress in industrial safety whereby, the Federal Government became deeply involved for the first time in the area of health and safety of the workforce. Following this, Executive Orders 11807 and 12196, dated September 18, 1974, and February 26, 1980, respectively, required Federal agencies to provide safety and health training for supervisory and non-supervisory employees. Department of Labor implementing regulations (29 Code of Federal Regulations) were issued in 1977 and 1980. Both regulations required each federal agency to provide specialized job safety and health training appropriate to the work performed. DOD instruction 6055-1, dated January 30, 1978, stated that non-supervisory personnel training should include specialized job safety training appropriate to the work performed, to include the provisions of relevant DOD occupational safety and health standards and hazards associated with any materials used in the work place. DOD instruction 6055-5, April 30, 1980, stated that health and

training shall be provided to assure that personnel understand the health hazards of their occupation, informed of safe work practices and equipped with the use of personal protective equipment. A copy of the DOD Health Service Report prepared for the Assistant Secretary of the Defense in 1985 is provided in exhibit 2.

(2) In Korea, the OSHA Program is under the responsibility of the 5th

Preventive Medicine Unit, a subordinate of 18th MEDCOM, EUSA. The OSHA for Korea was mandated to be implemented NLT early 1985. [redacted]

By the AR 15-6 investigation, the OSHA program is still in the stage of [redacted]

[redacted] By the statements of Mr. [redacted] Mr. [redacted] LTC [redacted] MAJ [redacted] and others, the awareness of the OSHA program is not known to the general Korean National workforce, or DAC supervisors at Camp Carroll, the industrial complex. Two OSHA health nurses have been assigned since Oct 87 working under the 5th Preventive Medicine unit. A Memorandum of Agreement with the 150th Medical Detachment Dispensary at Camp Carroll for OSHA utilization of equipment, shared areas, and support provided to the occupational health nurses is in effect. [redacted]

[redacted] vacant position is an important lynch pin to the OSHA [redacted]

[redacted] program. [redacted] an interview with occupational health nurses, [redacted]

[redacted] space, setup for office administration, interview areas are inadequate to [redacted]

support the MSC-K task at hand. They stated the Camp Carroll dispensary [redacted]

is not staffed with the appropriate number of medical personnel to [redacted]

complete medical physicals for Korean National employees working in the [redacted]

industrial complex. They also have proponent responsibility for the [redacted]

workers at Camp Walker, Camp Henry, the POA terminal, Chon-do, Pusan, [redacted]

Camp Liberty, and Camp Ancon. [redacted] funds to support [redacted] Visits are

required to provide health training, identify hazards, to determine [redacted]

medical screening and emphasize the importance of the OSHA program. On [redacted]

the other hand MSC-K chain of command was unaware of OSHA requirements, [redacted]

and medical surveillance programs. [redacted]

[redacted] of command support in order to accomplish the major [redacted]

(a) Development of a health hazard inventories to be completed at Camp Carroll and other remote sites, (b) Development of a health education program that can be provided to the work force so they understand the purpose and reasons for the OSHA implementation, (c) Establishment of a base line exposure data on the effects of hazardous materiel as it relates to health of individual workers, (d) Development of administrative and regulatory procedures that will be used in the implementation of the OSHA program, (e) The proper medical supplies and resources and administrative resources to support the OSHA program, (f) The procurement of equipment and facilities that are adquate to meet the needs for the administration of the OSHA program, (g) The establishment of an executive occupational health and safety council that tracks the implementation and progress of the OSHA program as it is being implemented in Korea.

(3) The OSHA progress must be reported to the Chief of Staff, USAFK to keep the program on track. Additionally, I think it's important for an

OSHA nurse at Camp Carroll to attend the weekly quarterback sessions involving the Commander, Camp Carroll, his directorate chiefs, and his staff. They can begin to become aware of the OSHA program and management requirements mandated under the OSHA rules. ~~OSHA should be responsible for~~

~~hiring of the industrial hygienist position for Camp Carroll to have this~~

~~responsibility as program as possible.~~ The industrial hygienist is important in the development and implementation and compliance of an OSHA program at Camp Carroll and other locations.

23. CID INVESTIGATION REPORTS

(1) The 7th Region, US Army CID Office in Taegu looked into the

allegations of Mr. [REDACTED] b6 he alleged that a Korean National Employee

female, paid a bribe to a civilian personnel office employee in order to

gain employment with the US Army. In the CID investigation report Exhibit

AA, investigation was closed on 17 May 1968, and the allegations made by

Mr. [REDACTED] b6 were unfounded. It is interesting to note that in the

agent's investigation report Ms. [REDACTED] b6 stated, Mr. [REDACTED] b6 was a hard man and

treated all personnel in that manner. Ms. [REDACTED] b6 stated, working for Mr.

[REDACTED] b6 became increasingly difficult, due to his demeanor and she was

willing to take any type of job available in order to avoid having to work

for Mr. [REDACTED] b6. She applied for a temporary job at the Technical Services

Branch, CPO, Taegu which caused her to lose privileges, but she accepted

the job because she could no longer bare to work for Mr. [REDACTED] b6 Ms. [REDACTED] b6

stated, she remained on that job for one year, after which she applied for

a position at MER, CPO Taegu, and obtained employment there in a permanent

job. Ms. [REDACTED] b6 stated, she did not pay any money to anyone, anytime, and

further stated that Mr. [REDACTED] b6 never asked her if she paid money, as he

stated in his letter of complaint.

(2) Another CID document, [REDACTED] b6 pertains to the hazardous materials

and allegations of Mr. [REDACTED] b6 the unavailability of personnel were

involved in the [REDACTED] b6

investing long technical [REDACTED] b6 which does reflect the minimum [REDACTED]

requirements of personnel involved in the operations [REDACTED]

marking of hazardous material. The CID states, special training only applies to certifying personnel. Other than certifying officials, only are required to be provided an initial familiarity, with annual refresher training. The CID office states, Mr. [redacted] incorrectly states the requirements in AR 55-355. Mr. [redacted] states, this regulation requires all personnel to be trained and tested. The CID states, this regulation actually requires certifying personnel to successfully complete formal DOT training, while personnel who prepare and handle hazardous material may receive OJT, or that which is accomplished by other acceptable training methods. On 10 May 88, the CID terminated this investigation.

24. Korean National Employee WORKFORCE, Camp Carroll.

The Korean National employees are a conservative force with an impressive 17 years, the average number of years served in a demanding physical job in the Transportation Division Directorate of S&I Commander, Camp Carroll and 19th SUPCOM. The Transportation Division on a daily basis, demonstrates the significant contributions of Korean National employees along beside American servicemen towards the mission accomplishment of MSC. The Korean National employee workforce is dedicated, loyal, and very hard working. Their assignments have been they are told in an unselfish manner. Their work accomplishments of 1986 and 1987 and 1988 to present need not impede or hinder in the completion of their more important assignment to meet the daily mission requirements of MSC. How they perform depends on management.

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understanding of their capabilities, their limitations, policy, and their cultural backgrounds. They view their jobs as important to financial security and livelihood. They have great aspirations of a better life for their children and family. Most attend the same churches, have in the surrounding community, socialize together, and some have part-time work in the agricultural fields and construction business. They are not fond of change but will adopt to change if the policies are logical and for the betterment of mission accomplishment. They like to be heard with an active voice in decision making and be rewarded accordingly for significant achievements. Most have learned their job through dedication and own initiative. Korean National Employees respect authority and position and in so doing have a tendency to tolerate abuse and neglect. This workforce serves as a critical entity in the overall support for the defense forces in the Republic of Korea. What I have said here summarizes perceptions of the Commander, Camp Carroll, the staff, and others who observe and know the accomplishments of the Korean National employees at Camp Carroll.

(2) In regards to [redacted] the workforce banned together, to get rid of Mr. [redacted], who treated them without due respect and dignity.

[redacted] threatened the workforce with demotions, transfers, and the possibility that personnel would be fired. It became a threat to their very own security and livelihood. I believe this alone warranted the [redacted] and the [redacted] of [redacted] by Mr. [redacted] and the [redacted] to [redacted] through [redacted] labor union [redacted]. The chain of command had

to act decisively and remove Mr. [REDACTED] from the workforce, or otherwise this strike would have spread throughout Camp Carroll, paralyzing the logistical support for EUSA as well as the shipment of commodities to outside overseas areas. The commands considerations, courses of actions and the ensuing Memorandum of Agreement to remove Mr. Brown from the workforce is at Exhibit CC.

25. REMOVAL OF [REDACTED] FROM THE WORK FORCE.

(1) The Commander, Camp Carroll directed that an AR 15-6 investigation to look into the matters of the grievances Exhibit R. AR 15-6 investigation conducted by Major [REDACTED] was shallow, limited to just the Korean National employee work force members that signed the grievance petition.

~~to believe that if the AR 15-6 investigation was expanded to others, the command would have gotten a true picture of what Mr. [REDACTED] was like and how he treated the Korean National employee work force.~~

~~there are differences between this investigation and the AR 15-6 investigation of Major [REDACTED]. The reason is simple, the Korean National employees were afraid that Mr. [REDACTED] would remain as the Chief Transportation Division to become more and more abusive and~~

~~again, a common worker fear of loss of jobs and security.~~ The AR 15-6 had to be limited in scope because Colonel Wheeler directed it be completed in a 7 day period. The AR 15-6 conducted by Maj [REDACTED] found no justification for major actions against Mr. [REDACTED] but [REDACTED]

~~[REDACTED] violation of management and made no recommendation~~
~~recommended that [REDACTED] receive a letter of admonition and [REDACTED]~~
~~to maintain a position of [REDACTED] [REDACTED]~~

(2) A series of MSC-K and 19th Sup Command events took place between 13 and 31 Aug, Exhibit CC, finally, with the ultimate decision that Mr. [REDACTED] b6 would remain in his current position and continue to function as the Transportation Officer with the limitations stated in a letter dated 31 Aug 87, Exhibit S. During all of this 19th Sup Command moved with cautiousness, and concern that the labor strike at Camp Carroll was related to potential labor action going on in Korea. [REDACTED] This message with a [REDACTED] 23 August message by MG Stadler, Exhibit DD, which states, "The current labor unrest in the ROK has created an environment conducive to labor disturbances within USFK." The Korean National Employee Union has presented to USFK a list of 14 issues that have been addressed in writing by the Office of the Civilian Personnel Director. It stated, a meeting of the Korean National Employee Union Executive Committee is scheduled for 26 Aug to consider USFK responses. It is highly probable that our responses would not be fully acceptable to all members of the Executive Committee, therefore, some form of union collective action must be anticipated. [REDACTED] the receipt of this message by MSC-K and with the consideration of the labor union grievances presented by the workers at Camp Carroll, the 19th SUPCOM as well as the Commander, Camp Carroll looked into the Waegon history of advances with great caution. They were not to be taken for granted. The problems at Camp Carroll was the beginning of a much larger labor and labor unrest in the Republic of Korea. The labor union at Camp Carroll and the 19th SUPCOM and the Commander, Camp Carroll are to be commended for their alert action to remove the labor from the work force.

26. CPO ACTIONS

(4) During the AF 15-6 investigation, I interviewed Mr. [REDACTED] b6
the Civilian Personnel Officer, Mr. [REDACTED] Chief, Recruitment and
Placement Branch, Mr. [REDACTED] Chief, Management Employees Relation Branch, b6
and Mr. [REDACTED] Chief, Training and Development Branch, CPO, 19th SUPCOM, b6
Tagu. Mr. [REDACTED] caused them frustration and continuous problems. It
started with Mr. [REDACTED] insistence to upgrade his position from a GS11 to b6
GS12. This ultimately ended with a decision made by an independent b6
adjudicating agency, OPM, San Francisco Region. The independent
adjudicating agency as the final authority on the grade classification of
Mr. [REDACTED] adjudicated his appeal under the provisions of 5 USC 5112 (b). b6
The OPM agency certified [REDACTED] position as Traffic Manager, GS 2130-11. b6
That was the final decision. Mr. [REDACTED] still was not satisfied with this b6
decision and on 13 May 87, he wrote Congressman Dicks and requested his
assistance in correcting the current position classification. The 19th
SUPCOM, CPO, EUSA, and the United States Office of Personnel Management
answered this congressional. Also Mr. [REDACTED] submitted an affidavit and b6
in April 1987, allegations he had been harassed by [REDACTED] b6
extension of his overseas tour, kept in an undergraded position and made
feel like he was not doing his job. [REDACTED] b6
In the grievance process of the USCARP, [REDACTED] b6
dated Aug. 87, which all stated the only issue [REDACTED] b6
Operations still would be the Jan 88 - Jan 87 performance. In
view of their investigation, they recommended the report for this period
be changed from a high successful to an exceptional rating which was done

by the chain of command.

(2) In a decision made by the Commander, Camp Carroll on 21 May 87, Mr.

██████████ was informed verbally and in writing that management had decided
b6
not to offer him another tour in Korea. The decision was made by Mr.

██████████ immediate supervisor, Mr. ██████████ and of course, concurred in by
b6
higher levels of review. Again, Mr. ██████████ was not in agreement with this

decision and filed a grievance on this matter. The grievance was
b6
processed under Army and CPO regulations.

(3) In CPO actions the chain of command did not violate the rights of Mr.

██████████ Mr. ██████████ received due course through the grievance and appeal
b6 b6
process in consideration of his complaints and allegations. In fact, Mr.

██████████ could not accept me as an answer on a decision that was counter to
b6
his ultimate conclusions. I conclude this upon the volumes of paperwork

and files generated as a matter of responding to Mr. ██████████ grievances,
b6
considerations and appeals involving one third of 19th Support Cnd, CPO

assets from 1986 until he departed the command in Nov 88. He

unnecessarily used every agency, staff, activity, organization within and
outside the chain of command to hear his case. In addition, if you review

his response to tour denial on 4 Aug 87, you can see from that he wasn't
through with this command. This is the subject of Extension of Overseas Duty

of Duty. ██████████ He states in para 2 Exhibit B that he never filed an
b6
in the process of providing additional documentation for a formal

compositional investigation into deliberate falsification of position

classifications, management and discipline and that he physically handled

He states, I believe, all employees should be treated fairly in all respects, not as I have been in the above position classification or by Major [redacted] during the 5 months, he was assigned to the position as the Director, S & T. He states, his performance has always been exceptional or outstanding and there was no reason for denial of extension of the overseas tour. On this [redacted] Aug 87, DF to CPO, we see the Congressional intent followed by a letter written to WPMC, and Congressman, dated 8 Sep 87, alleging the hazardous material issue. However, this letter did not address aspects of harassment and discrimination against handicap and how he had been unfairly treated by the Directorate of G&T. I believe he is going to continue to bring his case to point making allegations against the chain of command.

(4) A statement taken from [redacted] Director, Industrial Engineering indicates Mr. [redacted] vindictiveness. Mr. [redacted] bumped into Mr. [redacted] at the Kimpo Airport, sometime around Thanksgiving 1987. He stated, Mr. [redacted] discussed a new assignment in Japan at Cameron Station. Mr. [redacted] had been accepted in a telephone interview to become part of a logistics assistance team. Mr. [redacted] stated, the inspection team would be looking at logistic and transportation functions in Korea, Okinawa, and other Pacific areas. Mr. [redacted] stated, I thought that was peculiar because later I found out Mr. [redacted] was being assigned to Washington State working in a Transportation Office of a Navy organization. Mr. [redacted] stated, Mr. [redacted] made several statements expressing concern about the failure of workers attending DOT training and the fact he tried to transfer them from his organization not supported by the chain of command.

Mr. [REDACTED] stated, Mr. [REDACTED] was upset with the chain of command decision to remove him from the work force. Mr. [REDACTED] stated, from these

discussions I believed, Mr. [REDACTED] intended to pursue the matter through legal channels, congressional channels, and any other agency he could use

for this purpose. Mr. [REDACTED] stated Mr. [REDACTED] said to him, "This command has not heard the last from him."

(5) Mr. [REDACTED] behavior and the evidence presented, I can only draw the conclusion that Mr. [REDACTED] wrote letters to outside agencies not because of

merit or content, but because it is a way for him to get even. He has a grudge against 19th Support Command, and the Camp Carroll chain of

command. This lends credence to my conclusion Mr. [REDACTED] was vindictive and was on a grudge vendetta.

27. [REDACTED] PAST

(1) During the investigation, I substantiated how Mr. [REDACTED] treated employees from other organizations, during the last ten years. A

statement Exhibit P provided by Mr. [REDACTED] as the Management Officer Traffic Branch, Barstow, Calif stated, he had confrontations with Mr.

[REDACTED] in 1982. It was the abusive way Mr. [REDACTED] treated some of his employees. He states, he confronted Mr. [REDACTED] with the complaints and

they seemed to subside. He stated, Mr. [REDACTED] was not very well liked, abusive and abrasive did not treat employees in a proper manner. In

testimony of Mr. [REDACTED] Nontactical Vehicle Support Branch, J-4, in 1983 and 1984 stated, he had been working in the J-4 branch 10 years

before James Brown became his immediate supervisor. He said, Mr. [REDACTED] b6
[REDACTED] had a temper, easy to anger, and a hard man to work for. He stated, b6
Mr. [REDACTED] was incompetent in the job and a personality conflict existed b6
between [REDACTED] and Colonel Keysting. He felt this was the primarily b6
reason [REDACTED] took a demotion and transferred to Camp Carroll as b6
Division Chief, Transportation Division. Mr. [REDACTED] stated, he could not b6
tolerate the abusiveness from Mr. [REDACTED] and after he worked for him b6
approximately a year and a half, he transferred to a job as the EAST ITO b6
in Jan 84. He stated, Mr. [REDACTED] had only one way of doing things and that b6
was to do it [REDACTED] way, whether it be right or whether it be wrong. b6
If it was the wrong way Mr. [REDACTED] didn't care he forced people to do it b6
the wrong way. He stated, it was the first time in 10 years he had a bad b6
experience working for such a difficult person as Mr. [REDACTED] He said Mr. b6
[REDACTED] looked down upon the Koreans, disrespected them, and showed a b6
complete disregard for Korean employees. Testimony from a MSG [REDACTED] who b6
is now the NCOIC, as the ACoIS, Transportation Division, 19th SUPCOM, knew b6
Mr. [REDACTED] in 1979 at Camp Carroll. He stated, that he had heard Mr. [REDACTED] b6
curse around Korean employees, however, those words were not directed at a b6
person. He stated, Mr. [REDACTED] had difficulty dealing with people. In a b6
statement provided by Mr. [REDACTED] the SGM of the Transportation b6
Division, J4, in 1981 states [REDACTED] was not confident in his job, as b6
Chief of Nontactical Vehicle Branch, J-4. He stated, Mr. [REDACTED] was not b6
competent in written and oral communications and did not understand his b6
job. Col Keysting reported in and Mr. [REDACTED] days were numbered because b6
of poor performance. Mr. [REDACTED] took a way out as quickly as possible to b6
the job at Camp Carroll, MSC-K. [REDACTED] stated, another reason for b6

Colonel Keystring's decision to remove [REDACTED] was failure to repair.
[REDACTED] would come in the morning and take off 0830 or 0900 and not be
seen until 1500 or 1600 in the afternoon. He stated, [REDACTED] left the
position to keep from receiving a bad evaluation and the fact that Colonel
Keystring was not satisfied with [REDACTED] performance.

(2) Looking at Mr. [REDACTED] past record 1979, Nov 1988, indicates a
troubled supervisor. He can't deal with and manage subordinate employees
in a proper relationship of superior to subordinate. This was just the
opposite in Mr. [REDACTED] dealings with his seniors. As supervisor, he
suffered a disorder of explosive personality, marked by outburst or rage,
aggressiveness, and over responsiveness to pressures and appeared to have
the inability to control such outbursts. The abnormal behavior may have
been caused by the trauma [REDACTED] suffered in Viet Nam. At best, I
can say this is purely conjectural on my part. It is extremely difficult
to determine speculation in the medical field.

28. RECOMMENDATIONS

21. EUSA Staff Judge Advocate review the Ministry of Health and Social
Affairs, Environmental Standards and Korea's Environmental Preservation
Laws. Define EUSA environmental compliance standards.

22. EUSA put in place an Environmental Management Office properly staffed
with the expertise and organized as the focal point for policy, management
problems, in handling of toxic and hazardous materiel and hazardous waste.

3. The EUSA Chief of Staff direct Resource Management to carry out a survey looking at organizational structure, resources, requirements, and responsibility to ensure US installations have proper manning, and the staff expertise to carry out a Hazardous Materiel/Hazardous Waste Program.

4. EUSA publish policy and responsibility, procedures, and standards for the systematic control and monitorship of the identification, the collection, separation, storage, processing, recovery, abatement, management, and disposal of hazardous materiel, hazardous waste, and toxic chemicals within the Republic of Korea. That uniform regulations and policy guidance be signed by the Chief of Staff, EUSA.

5. EUSA ensures an Environmental Coordinator is named at every U.S. installation with responsibility and authority to administer the hazardous materiel, hazardous waste, and toxic chemicals management program.

6. EUSA develop an Environmental Program as a model for installations and other activities as prescribed by AR 420-47, AR 200-1 and AR 40-5.

7. That the EUS Army provide policy and guidance for each installation to establish a Waste Analysis Plan under AR 420-47, AR 200-1, and AR 40-5.

8. That EUSA provide policy and guidance for each installation for the development of Spill Prevention Control and Countermeasures Plan required by AR 200-1, Chapter 8. The same applies for each installation to have an Installation Spill Contingency Plan under Chapter 8, AR 200-1.

9. That EUSA establish policy and set responsibility for development of a comprehensive hazardous materiel, hazardous waste, toxic chemical training program. Establish policy and regulations.

10. That EUSA ACoFS, Ji, Directorate of Safety, implement safety workshops for all subordinate safety managers to become smart and aware of dangers in handling and storing hazardous materiel, hazardous waste, toxic chemicals. That safety workshops be conducted at least semiannually.

11. That EUSA Safety and 5th Preventive Medicine integrate and coordinate a more active role in training the work force in the specifics of hazardous materiel, hazardous waste and toxic chemicals in safe work methods and practices.

12. That the EUSA Inspector General and subordinate IG's, inspect hazardous materiel, hazardous waste, and toxic chemicals management as a special subject of inspections in units and activities at all levels. The EUSA IG be given a copy of this report.

13. That EUSA provide necessary support to the OSHA program.

14. EUSA ensure private contractors collecting and disposing of hazardous waste, from US Army installations are registered and licensed with the Republic of Korea, Ministry of Health and Social Affairs Office.

15. EUSA provide assistance to MSC-K for verifying proper storage of hazardous materiel and chemicals in Warehouse #6.

16. EUSA look at and prioritize the hiring of an industrial hygienist for the MSC-K, Camp Carroll industrial complex.

17. EUSA SJA, and Directorate of OCP determine if any legal actions, administrative actions, can be taken against Mr. [REDACTED]. He was departed from this command. ⁶⁶

18. Mr. [REDACTED] is not entitled to reinstatement as Chief, ⁶⁶ Transportation Division, MSC-K, Camp Carroll. As a matter of record, Mr. [REDACTED] should never be allowed his rights as an employee and ⁶⁶ supervisor in the Republic of Korea.

19. I find no evidence of harassment or discriminatory actions taken against Mr. [REDACTED] by the Command, Camp Carroll, and or 19th SUPCOM Staff. ⁶⁶

20. That any outside agency conducting inspections of hazardous materiel, hazardous waste management and handling of toxic chemicals, inspection reports be forwarded through EUSA Chief of Staff's office.

21. Commander, 8th PERSCOM insure Movements Specialist, MOS 89N, being assigned to Camp Carroll, as hazardous cargo certifiers are qualified IAW TM 38-250. If they are not qualified, they must attend a DOT formal school TDY enroute to Korea.

22. The Directorate of S & T ensure there are adequate pre-course study materials, translated into Hangul, to provide Korean employees a fair opportunity to pass a DOT program of instruction presented by either the Air Force or Army Agencies.

23. The Directorate of S & T look at Hangul translations of technical manuals to aid the Korean National employee work force in the Transportation Division.

24. Directorate of S & T continue to work on updating SOP's published in English and Hangul for the Korean National employee workforce. Develop a hazardous handling course of instruction for the workforce. Lesson book Exhibit HH.

25. Directorate of S&T develop and conduct hazardous material training and administration for the workforce IAW TM 38-250.

26. That more green suiters be present in the Camp Carroll industrial complex, especially the work areas to keep a pulse on the Korean National employee work force. Ensure employees are treated with dignity, fairness and respect.

27. That 19th SUPCOM, EUSA take action to ensure staff assistance visits include inspection of hazardous materiel, hazardous waste, and toxic chemical management and the inspections are done by qualified personnel. Hazardous materiel, hazardous waste, and toxic chemicals should be looked at in an integrated and a coordinated staff effort to include Safety, 5th Preventive Medicine, DEH, J-4 Transportation, and others as deemed appropriate.

28. EUSA seek continued surveys and assistance from the United States Environmental Hygiene Agencies from Aberdeen and Japan.

29. EUSA determine if any additional works is required to clean up the contaminated areas at Camp Carroll.

30. Any letters of admonishment, or adverse actions taken against Korean employees or military by Mr. [REDACTED] be withdrawn from official files.

b6

31. This investigation be approved and closed without an interview of Mr.

[REDACTED] Otherwise, with the prejudicial information against Mr.

b6

[REDACTED] he must be named a respondent in a formal AR 15-6 conducted by a board of officers. To protect the rights of Mr. [REDACTED] and interest of EUSA, Mr. [REDACTED] was not contacted during this informal AR 15-6.

b6

[REDACTED] b6
AR 15-6, Investigating Officer

USFK, C/J3, CJ-CC

As points of clarification to the Yonhap News Agency web article dated 19 May 2011, entitled "U.S. Asked to Verify Alleged Burial of Agent Orange in South Korea", please see discussion below:

(Source: <http://english.yonhapnews.co.kr/national/2011/05/19/19/0301000000AEN20110519006301315F.HTML>)

The Army Institute of Public Health does not maintain records of the specific times, locations, or amounts/inventories of storage, dispersal or disposal for tactical herbicides such as Agent Orange. The Army Institute of Public Health is responsible for operation of the Department of Defense Pesticide Hotline, a service that provides information concerning pesticides and pest management to the Defense community. To provide information concerning the use and storage of tactical herbicides at Camp Carroll, Korea, we analyzed information available from the [REDACTED] Collection on Agent Orange at the United States Department of Agriculture (USDA) National Agricultural Library and the Literature Retrieval System at the Armed Forces Pest Management Board.

Tactical herbicides, such as Agent Orange, were developed specifically by the United States Department of Defense to be used in support of combat operations. All containers of tactical herbicides were packaged and labeled according to the protocols illustrated in Figures 1. And 2., below (source: [REDACTED] December 2006, "The History of the US Department of Defense Programs for the Testing, Evaluation, and Storage of Tactical Herbicides", Report No. TCN 05204, US Army Research Office, Research Triangle Park, North Carolina, available online: http://www.dod.mil/pubs/foi/reading_room/TacticalHerbicides.pdf).

- No records exist which specifically identify Camp Carroll as a transshipment, storage, staging, or disposal area as part of the deployment of tactical herbicides in Korea or Vietnam. Tactical herbicides, for use as defoliants or knockdown/residual vegetation control were neither authorized by the Armed Forces Pest Control Board (AFPCB) nor were they available to base civil engineers for garrison weed control operations in Korea.
- The herbicide 2,4,5-T was an ingredient in a number of tactical herbicide formulations. Both 2,4,5-T and 2,4,5-TP (silvex) contained dioxin (TCDD) as a manufacturing impurity. These same herbicides, as a sole ingredient products, or in premix with other herbicides were commercially available, and were approved by the AFPCB for use on overseas military installations for vegetation control in noncropland sites, such as roadsides and fence lines, equipment/supply depots, and utility right-of-ways (see Figure 3., below). These herbicide products would not be labeled with color coded stripes. These herbicide products bore commercial labels approved by the Pesticides Regulation Branch of the USDA (antecedent of USEPA), and in full compliance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).
- Shipments of tactical herbicides were delivered directly to Air Bases at Bien Hoa and Da Nang, Vietnam out of Gulfport, Mississippi or Mobile, Alabama. After the Department of Defense issued a total suspension of the use of Herbicide Orange in all military operations in Southeast Asia, all the stocks of Herbicide Orange remaining in Vietnam were shipped directly to Johnston Island, Central Pacific Ocean and labeled according to the protocol illustrated in Figure 2., below).
- The tactical herbicides were color-coded to facilitate herbicide selection, transportation, and incompatibility issues. Thus, the military code names Orange, Blue, White, Pink, Green, and Purple were given to each different military formulation. Contemporary to their use,

military units referred to these products as "Herbicide Orange" or "Herbicide Blue". Only beginning in the early 1970's, did the media and critics of the use of these herbicides refer to them as "Agents".

In early 1967, as part of a general review of the Demilitarized Zone (DMZ) defenses, the United Nations Command and the United States Forces Korea found that dense vegetation within the DMZ and contiguous areas provided cover for North Korean infiltration or raiding parties (reference: [redacted] January 1969, "Final Report, Vegetation Control Plan CY 68", Memorandum to Commanding Officer, Combat Developments Command, Chemical-Biological-Radiological Agency, FT McClellan, AL, Report No. 203-C69, Department of the Army, Headquarters, US Army Advisory Group, Korea, summary available online (pages 55-57): http://www.dod.gov/pubs/foi/reading_room/TacticalHerbicides.pdf).

- On 4 March 1968, the Commander, US Forces in Korea was authorized to deploy tactical herbicides as part of the vegetation control program in Korea. By April 1968, supplies of all the defoliants were on-hand in forward locations (specific camps not identified). Applications of the tactical Herbicides Orange (2,4-D + 2,4,5-T) and Blue (cacodylic acid + surfactant + antifoam agent + sodium chloride) began on 15 May 1968 and were terminated on 15 July 1968.
- A total of 20,900 gallons of Herbicide Orange were applied on 6,966 acres, and a total of 34,375 gallons of Agent Blue were applied on 11,458 acres. All applications of tactical herbicides were conducted by ROK Army personnel, using ground equipment, treating 30-100 meter wide strips immediately adjacent to (but not North of) the DMZ South boundary. *Supplies of both tactical herbicides were exhausted before the entire length of the DMZ could be treated.*
- Disposal procedures for empty and/or damaged tactical herbicide containers were not discussed in Report No. 203-C69.

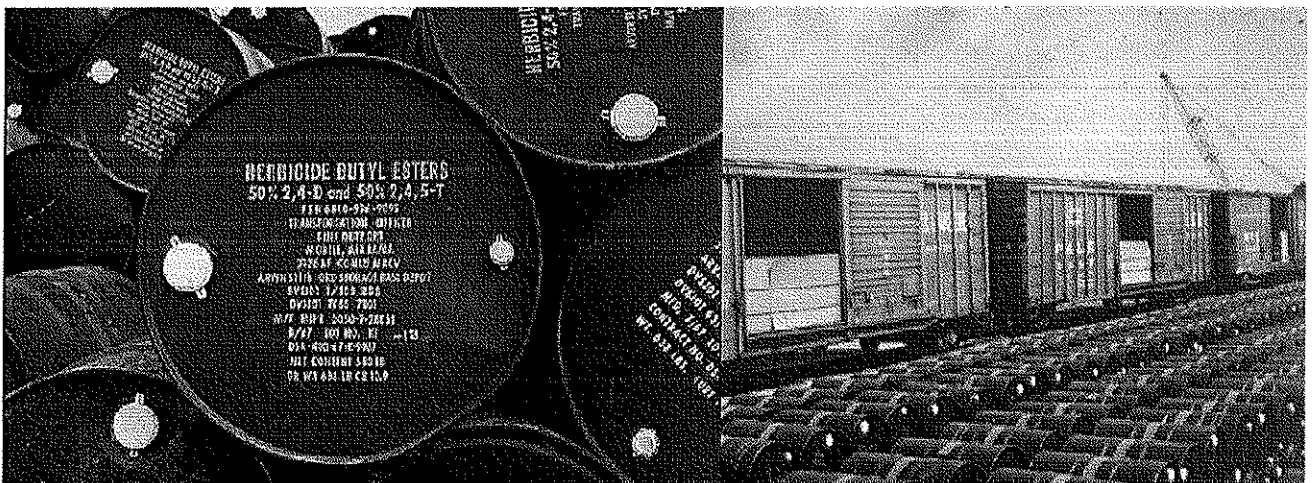


Figure 1. An example how Herbicide Orange in 55gal drums were labeled. (Left) The lid (top) of each drum specified the content (Herbicide Butyl Esters of 2,4-D and 2,4,5-T), the Federal Specification Number (FSN), US Port of Embarkation (Mobile, Alabama), destination (ARVN 511th Ordnance Storage Depot, Da Nang, Vietnam), procurement information (including date, 8/67), and net weight. Each of the 11 different companies that manufactured military herbicides packed them in new 55 gal 18 gauge steel drums for shipment to Southeast Asia. (Right) Each herbicide drum was also marked with a 7.6-centimeter color-coded band around the center to identify the specific military herbicide (source: [redacted] Final Report. Agent Orange: A History of Its Use, Disposition, and Environmental Fate, Contract No. DAAD19-02-D-0001, TCN 05204/D.O. 0691, 30 June 2008).

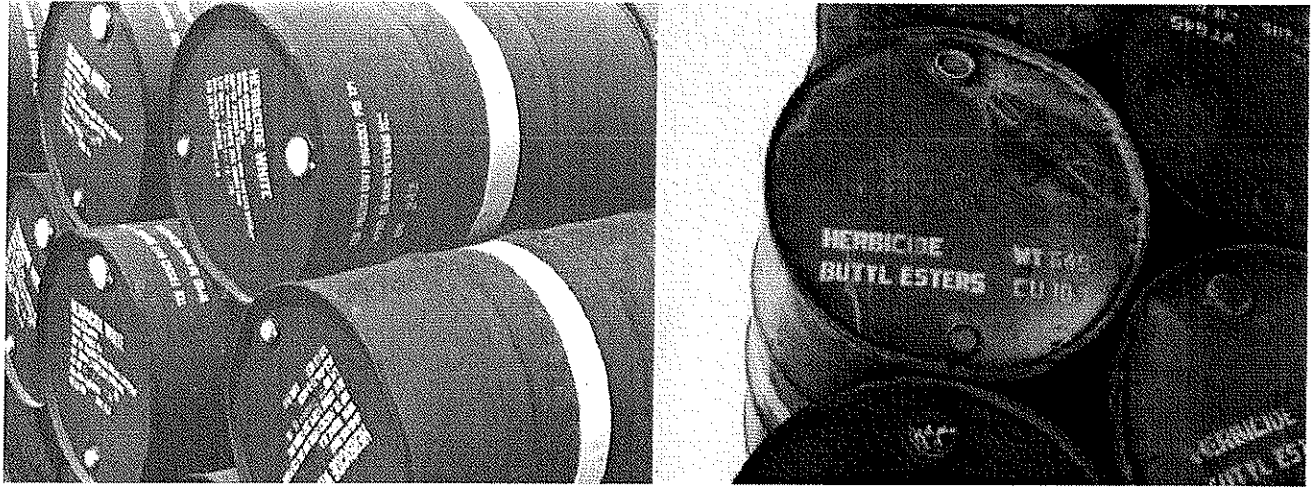


Figure 2. An example how other tactical herbicides were labeled for shipment to Vietnam and how containers of Herbicide Orange shipped for disposal were labeled. (Left) As standard operating procedure, all drums of tactical herbicides were marked with a 7.6-cm color-coded band around the center to identify the specific military herbicide. The lid (top) of each drum specified the content (triisopropanolamine salt of picloram 10.2% + triisopropanolamine salt of 2,4-D 39.6%, Herbicide White), the FSN, US Port of Embarkation, destination, procurement information and net weight. (Right) The drums of Herbicide Orange shipped from South Vietnam to Johnston Island for disposal were labeled as "Herbicide Butyl Esters" (source: [redacted] Final Report. Agent Orange: A History of Its Use, Disposition, and Environmental Fate, Contract No. DAAD19-02-D-0001, TCN 05204/D.O. 0691, 30 June 2008). b6

5840-577-4194	Herbicide, 2,4-D, Low Volatile Liquid Ester (4 lb acid per gal).	5 gal drum	18.30	O-H-200 Type III Class 2
5840-577-4195	Herbicide, 2,4-D, Low Volatile Liquid Ester (4 lb Acid/gal).	55 gal drum	181.00	O-H-200 Type III Class 2
5840-825-7792	Herbicide, 2,4-D, 2,4,5-T mixture Low Volatile Liquid Ester (2 lb each acid/gal).	55 gal drum	297.00	
5840-582-5440	Herbicide, 2,4,5-T, Low Volatile Liquid Ester (4 lb acid per gal).	5 gal can	32.60	O-H-210 Type II Class 2
5840-577-4201	Herbicide, 2,4,5-T, Low Volatile Liquid Ester (4 lb acid per gal).	55 gal drum	348.00	O-H-210 Type II Class 2

Figure 3. Herbicides containing 2,4,5-T and 2,4,5-TP (silvex) assigned NSN's, packaged in 55 gal drums, and available for shipment to and use at base camps in Korea during 1968. Highlighted areas show products that were authorized by the AFPCB and available to base civil engineers for garrison weed control operations in Korea (source: Department of the Army Supply Bulletin, SB 3-40, Herbicides, Pest Control Agents, and Disinfectants, 18 September 1968).

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CPT [REDACTED]

b6

EHEA-ES

24 November 1982

SUBJECT: Review of the Camp Carroll Chemical Disposal Problem

Commander
USAMSC-K & CC
ATTR: COL J. E. Jones
APO 96460

1. REFERENCE.

- a. Report, this Agency, 8-24 October 1974, subject: Comprehensive Environmental Engineering Survey, Volume I, Project No. K4-0405-1024, Camp Carroll Army Depot, Wae Gwan, South Korea.
- b. Report, this Agency, 25 July-5 August 1977, subject: Comprehensive Environmental Engineering Review, Project No. 92-021-77, US Army Materiel Support Command-Korea, Camp Carroll, Korea.
- c. Memorandum for Record, Commander, 5th Preventive Medicine Unit, LB Detachment, subject: Chemicals Buried at Camp Carroll, dated 23 February 1979.
- d. Memorandum for Record, Commander 5th Preventive Medicine Unit, LB Detachment, subject: Buried Chemicals at Camp Carroll, dated 24 October 1979.
- e. Letter, Commander, 5th Preventive Medicine Unit, LB Detachment, to Deputy Commander, USA Materiel and Support Center, Korea, subject: Estimation of Volume and Weight of Chemicals and Containers from Burial Site at Camp Carroll, dated 17 March 1980.
- f. Message, CDRUSAFIGHT, DJ-VE-R, 190430Z May 80, subject: Disposal of Hazardous Materials.
- g. Letter, Commander, 5th Preventive Medicine Unit, LB Detachment, to Commander, USA Environmental Hygiene Agency (USA/EHA), Aberdeen Proving Ground, Maryland, subject: Environmental Samples - Camp Carroll, Korea, dated 7 August 1980.

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ENE2-ES

SUBJECT: Review of the Camp Carroll Chemical Disposal Problem

24 November 1982

a. Letter, Commander, USAEHA to Commander, 5th Preventive Medicine Unit, subject: Results from Analyses of Camp Carroll, Korea, Samples, dated 19 March 1981.

2. BACKGROUND. Hazardous materials were improperly disposed of in a burial site in "Area D," at Camp Carroll, Korea, in 1978. These were, reportedly, the chemical containers that were initially stored in Area 41, whose condition had deteriorated to the point that considerable leakage had occurred. This report lists, chronologically, occurrences that are documented in the files of this organization.

3. CHRONOLOGICAL RECORD OF THE HAZARDOUS MATERIAL PROBLEM AT CAMP CARROLL, KOREA.

a. Reference is indicated that large quantities of spent industrial chemicals and code H chemicals were accumulating at Camp Carroll in 1974 due to a lack of proper disposal procedures and political, economical and topographical restraints.

b. The following extracts from the review conducted in 1977 (reference 1b) provided instructions to protect the environment from the impact of the deteriorating chemical containers.

4. FINDINGS AND DISCUSSION. . . .

4b(2)(a) Area 41 contained a multitude of contaminated and unusable chemical products. These chemicals had been accepted by DPCC-Pusan for disposal by contract to a Korean firm. The bid date for the contract was 14 July 1977 with an expiration date of 18 August 1977. A portion of the products had already been picked up by the contractor. However, there were still quantities awaiting pickup which the contractor, reportedly, could not accept because ROK customs officials would not allow them to be transported. Information was not available as to the reason for this disallowance. DPCC-Pusan would not accept these chemicals for storage at Pusan because of limited storage capacity. The condition of the products remaining in Area 41 was poor. The soil in the area was obviously contaminated with numerous chemicals from leaking containers and from products which had been stored in this area in the past. There was evidence that a portion of these leaking chemicals was washed into the storm drainage ditch, adjacent to the southeast corner of Area 41, by surface water runoff during rains. Most of the products needed to be repackaged to prevent further contamination of the soil. The responsibility for ensuring the proper packaging and storage of these products belonged to the Directorate of Supply and Transportation. Care

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24 November 1982

SUBJECT: Review of the Camp Carroll Chemical Disposal Problem

and Preservation Division, USAMSC-K, based on the memorandum of understanding between OPDO-Pusan and USAMSC-K. The disposal of these products by contract should be made after repackaging is accomplished.

"(b) Once the chemical products are removed, this area must be decontaminated. Decontamination consists of excavation of at least the upper three feet of soil from this area which was a triangular shape sixty yards wide by forty yards long. The ground sloped from east to west with a drop in elevation of approximately six feet. Therefore, to level the area approximately nine feet of soil would have to be excavated from the eastern portion, sloping to the three feet of required excavation from western portion. A suitable burial site for this contaminated soil was located in Area D (Figure 1, Appendix H). This area is situated approximately five miles from the nearest stream (located to the southwest). Surface drainage was diverted naturally away from the proposed site. The elevation of the area was approximately one hundred feet above the estimated groundwater table for the area (based on surface water streams). The possibility of future construction on the burial site was remote because of the location of the heliport. The burial should be accomplished by the excavation of a trench eight feet deep by ten feet wide by fifty feet long. The soil excavated from Area 41 should be placed in the trench, compacted and covered with at least two feet of uncontaminated soil. Uncontaminated soil from Area D should be transported to Area 41 and compacted to provide at least two feet of cover for the excavated area. . . .

"6. RECOMMENDATIONS. . . .

"h. Chemical Storage and Disposal.

"(1) Recontainerize or package all chemical products located in Area 41 in suitable storage containers as specified in applicable sections of TM 3-250. Ensure that personnel performing the transfer operations are provided with adequate protective clothing and equipment as specified in Chapter 2, Section VII of TM 3-250. Coordinate all transfer operations with the Safety Director.

"(2) Decontaminate Area 41 by excavation of at least the top three feet of soil and burying this soil in the selected site in Area D. Compact at least two feet of uncontaminated soil on the excavated area. Specific instructions are contained in para 4h(2)(b) above."

c. Chemical products from "Area 41" were buried in "Area D" at Camp Carroll during March 1978 (references 1f and 1g). There is no record in

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SUBJECT: Review of the Camp Carroll Chemical Disposal Problem

24 November 1982

the files of this office that any agency or office authorized burial of any hazardous materials other than the soil already contaminated (reference 1b).

d. Confirmation that hazardous materiel had been buried without authorization at Camp Carroll occurred on 16 February 1979 after unverified reports were initially received by the 5th Preventive Medicine Unit, LB Detachment (SPMU LB DET) around 9 January 1979. The decision was made by COL Elam, Commander, USA Material Support Command (USAMSC), on 16 February 1979, to remove, recontainerize, and properly dispose of the buried materiel (reference 1c & 1g). This decision was supported by BG Pendleton, Commander, 19th Support Command, during a meeting on 16 October 1979 (reference 1d).

e. Approximately 6,100 cubic feet of 188 types of various materials weighing between 40 and 100 tons were removed from the "Area B" burial site during the period November 1979-January 1980 (reference 1e and 1f). The materials removed included numerous containers of pesticides (malathion, chlordane, DDT, Lindane, Dieldrin), acids, bases, various petroleum products, paints, cleaning solvents, detergents, varnishes, and other assorted chemicals (reference 1h). Some cross contamination of products had occurred due to the deteriorated condition of chemical containers (reference 1f).

f. The extracted chemicals were stored in a diked storage area until containers for repackaging of the materials were received and recontainerization started in May 1980. Recontainerization was halted in June 1980 because containers being used did not meet United States Department of Transportation (DOT) requirements. Completion of repackaging was awaiting receipt of approved (DOT) containers in August 1980 (reference 1g).

g. Reference 1g is the most recent correspondence on this subject in our files. This office has no documentation on ultimate disposal site location and dates of final disposal of the materiel. USAPACENEA records also do not indicate if the contaminated soil from "Area 41" was ever removed and properly buried.

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24 November 1982
SUBJECT: Review of the Camp Carroll Chemical Disposal Problem

4. The point of contact for this review is CPT [REDACTED] AUTOVON
[REDACTED] b6 b6

[REDACTED]
LTC, MS
Commanding b6

CPT [REDACTED] b6

EHEA-EE

18 January 1983

MEMORANDUM FOR RECORD

SUBJECT: Hazardous Materials Special Study, Project No. 37-91-0206-83,
Camp Carroll, Korea, 29 November-11 December 1982

1. A meeting was held at Camp Carroll, Korea, on 30 November 1982, to discuss hazardous waste management in Korea, especially as it related to Camp Carroll. This meeting was arranged as a result of an earlier visit to the US Army Pacific Environmental Health Engineering Agency (USAPACEHEA) by COL J. E. Jones, Commander, US Army Material Support Command-Korea and Camp Carroll (USAMSC-K and CC). The following personnel attended the meeting:

- a. COL J. E. Jones, Commander, USAMSC-K and CC.
- b. LTC [REDACTED] Commander, USAPACEHEA. b6
- c. CPT [REDACTED] Commander, 5th Preventive Medicine Unit (5PMU), LB Det, Taegu, Korea. b6
- d. CPT [REDACTED] Sanitary Engineer, 5PMU, LC Det, Yongsan, Korea. b6
- e. CPT [REDACTED] Environmental Science Officer, USAPACEHEA. b6

2. Subject matter discussed during the meeting included:

a. A review of previously documented Camp Carroll hazardous waste disposal problems, as described in a letter to Commander, USAMSC-K and CC, subject: Review of the Camp Carroll Chemical Disposal Problem, dated 24 November 1982 (inclosure).

b. The possibility of one centralized hazardous waste site being established within Korea. COL Jones felt this site would most probably be located at Camp Carroll. It was not known if this would be a storage site, a disposal site, a recontainerization and retrograde point or if it would be designed in some other configuration. A decision on locating such a site had not been made, but Col Jones desired to have as much advance coordination and planning done as possible to prevent a recurrence of the type of problems experienced in the past at Camp Carroll (inclosure).

c. It was mentioned that some hazardous wastes, other than those previously removed from the site identified in the inclosure, may have been

EHEA-EE

SUBJECT: Hazardous Materials Special Study, Project No. 37-91-0206-83

18 January 1983

buried at Camp Carroll. COL Jones did not feel that any investigation would be necessary in the absence of any currently known problems associated with the alleged past burials of chemicals at Camp Carroll. The point was raised of a possible need to monitor groundwater by drilling observation wells around the burial sites, in particular, and the installation, in general. There was no existing documentation pertaining to unauthorized burial of hazardous wastes at Camp Carroll, although there was an institutional memory that some burial did occur, as delineated in paragraph 3 below. COL Jones indicated that previous searches had been fruitless in locating documents relating to any unauthorized burial of wastes at Camp Carroll.

3. A tour of three sites on Camp Carroll where unauthorized burial of wastes had, reportedly, occurred was made with a representative of the Sub-Area Facilities Engineer (SAFE) at Camp Carroll just prior to the 30 November meeting with COL Jones. Personnel on this tour included the SAFE representative, LTC [REDACTED] CPT [REDACTED] CPT [REDACTED] CPT [REDACTED] and 1LT [REDACTED] and SP5 [REDACTED] from USAPACEHA. The materials buried at two of the sites near Building 320 were, reportedly, primarily boxes and crating materials. The site near Building 580 was more likely to contain hazardous materials, as indicated by a description of a fire started by a crawler tractor during covering operations (circa 1975) and the lack of grass cover over the site (noted during the tour), although the area surrounding the site had grass cover. It can be concluded, therefore, that the potential exists that even more unauthorized burial sites may be located on the installation. A visit to the site described in the inclosure, revealed that ground cover had not yet been well established, that some general domestic-type waste products were laying on top of the ground and that soil erosion was occurring.

4. Contact was made with Mr. [REDACTED] a geologist with the Far East District (FED), Corps of Engineers, in Yongsan on 2 December 1982, to obtain information as to the availability of drilling equipment for drilling monitoring wells or supporting USAPACEHA in conducting feasibility studies in selecting a site for hazardous waste operations. Mr. [REDACTED] indicated that their drilling equipment could normally be made available within thirty days and they had the capability both for drilling monitoring wells and supporting future feasibility studies. Mr. [REDACTED] also felt that Camp Carroll may be a poor site for hazardous waste operations due to the geology of that area.

5. CPT [REDACTED] USAPACEHA, telephoned MAJ [REDACTED] Chief, Waste Disposal Engineering Division, US Army Environmental Hygiene Agency (USAEHA), Aberdeen Proving Ground, Maryland, AUTOVON [REDACTED] on 28 October 1982. This contact was made to determine what support would be available to this Agency in a hazardous waste site selection and design process. MAJ [REDACTED] indicated USAEHA would be readily available for telephonic consultation and could normally provide field support within sixty (60) days. USAEHA would be able

EHEA-EE

SUBJECT: Hazardous Materials Special Study, Project No. 37-91-0206-83

18 January 1983

to provide all necessary support for site selection and design of hazardous waste/materials management storage and disposal facilities.

6. The point of contact at USAPACEHEA for coordination or additional information on this subject is CPT [REDACTED] AUTOVON (Japan)

[REDACTED] b6

[REDACTED] b6

1 Incl
as

[REDACTED] b6

CPT, MS
Environmental Science Officer

CF:
HQDA DASG-PSP
HQDA DAEN-ZCE
Cdr, USARJ (w/o Incl)
Cdr, USAEHA (HSE-M) (2 cy)
Cdr, USAMSC-K & CC (COL Jones) (w/o Incl)
Cdr, 5PMU (w/o Incl)
SAFE (w/o Incl)

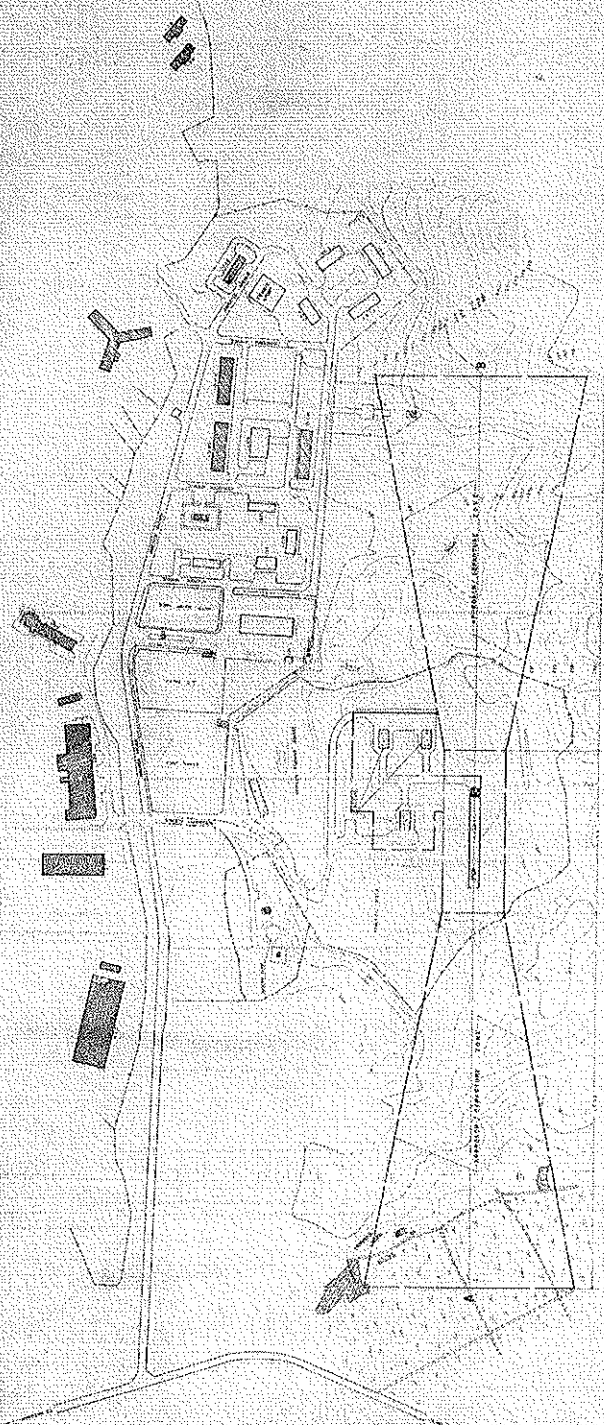
LEGEND

- BUILDING, NOT STANDARD
- BUILDING, STANDARD
- PAVED AREA AND PARKING AREA
- CONCRETE REINFORCED SLAB TO BE BUILT
- EXCAVATION, SHALLOW
- EXCAVATION, DEEP
- TRENCH, WIDE
- TRENCH, NARROW
- FENCE LINE

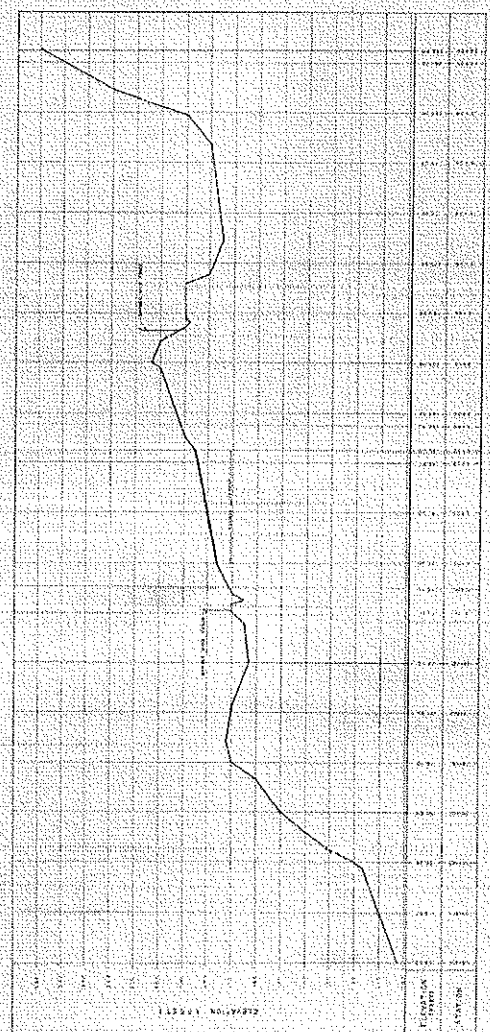
HELIPORT ELEVATION:
 184 FT. MSL
 TRUE BEARING OF RUNWAY:
 151° 55' 00"



CAMP CARROLL	
(NAME OF THE DISTRICT AND THE TYPE OF DRAWING)	
DATE: 1952	
DRAWN BY: [Name]	
CHECKED BY: [Name]	
APPROVED BY: [Name]	
TITLE: AIRFIELD MAP	
(DRAWING NUMBER AND SHEET NUMBER)	
(SCALE AND UNIT)	
(DATE OF ISSUE)	
(DRAWING NUMBER AND SHEET NUMBER)	

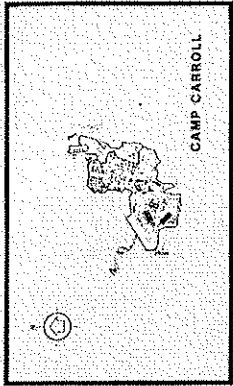


PLAN OF HELIPORT
 DATE: 1952



PROFILE A-B
 DATE: 1952

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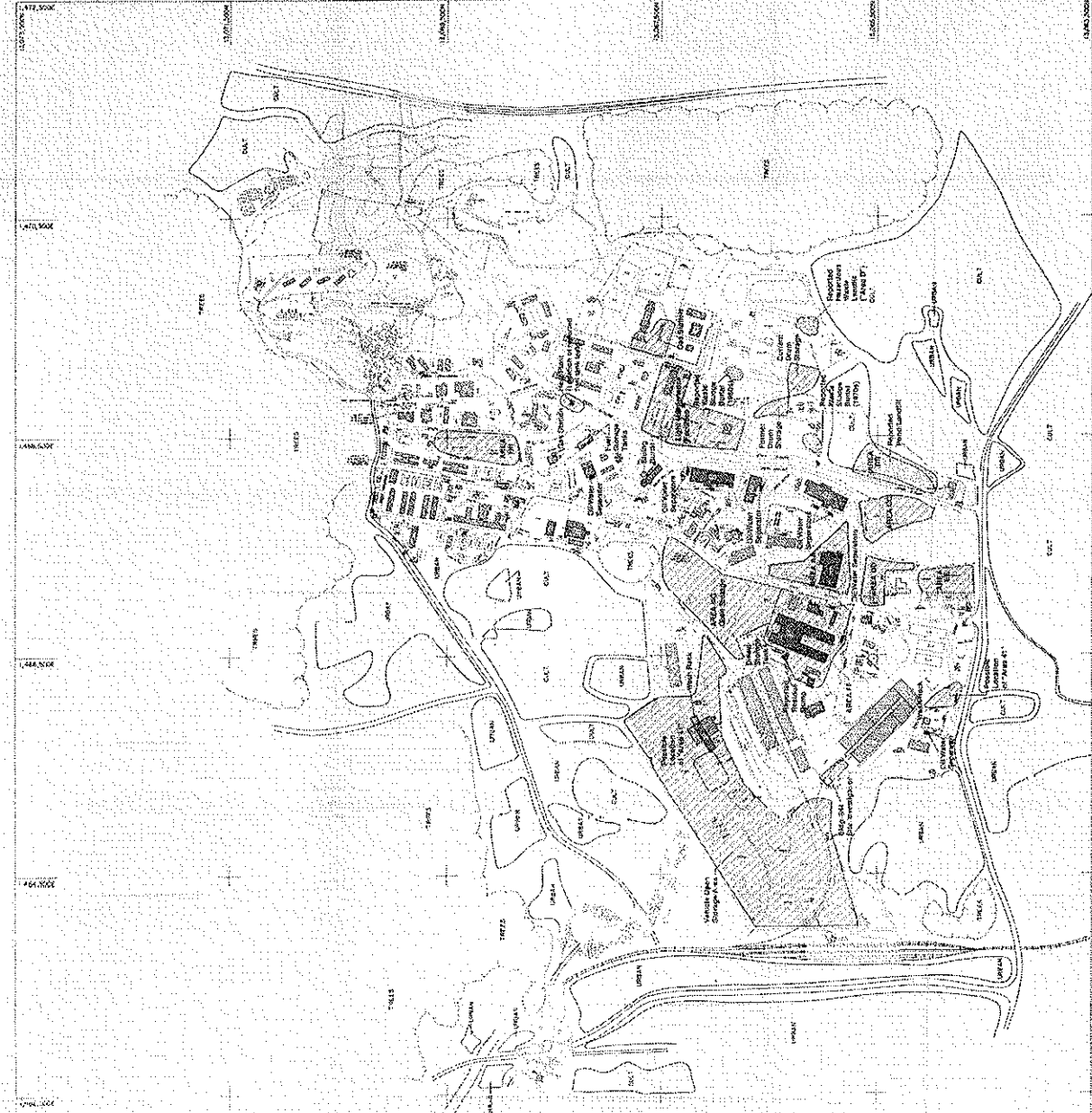


- LEGEND**
- Proposed Construction
 - Source Area Drainage Study
 - Proposed Construction
 - Existing Facilities to be Relocated/Revised/Revised in Construction
 - Proposed Construction of University
 - Proposed Construction of High School
 - Proposed Construction of High School



DRYD

POTENTIAL CONSTRUCTION SOURCE AREAS MAP		Figure 5
Project No.	91 C00606	
Project Name	Camp Carroll	
Woodward-Clyde Consultants		



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US Army Corps of Engineers

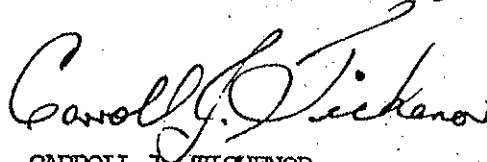
= Interest to CCTF Investigative LOO

= General Interest

USFK/EUSA SUMMARY SHEET (USFK MEMO 340-15)						SJS LOG NO.:		
NO.	TO	ACTION	CONCUR	NON-CONCUR	SIGNATURE (SURNAME), GRADE, & DATE	COMMAND GROUP COORDINATION		
						NO.	TO	ACTION
1	J-1	Safety Coord	X		Mr. [REDACTED] ^{b6} 20 NOV 1988			
2	J-3	Coord	X w/	cmt	MG Carpenter ^{b6} 14 NOV 1988	9.	SJS Coord	
3	J-4	Coord	X w/	cmt	BC Akin ^{b6} 16 NOV 1988	10.	DCS Coord	
4	PAJ	Coord	X w/	cmt	COL [REDACTED] ^{b6} 1 NOV 1988	11.	CS Approv	
5	RMJ	Coord	X		Mr. [REDACTED] ^{b6} 8 NOV 1988		DCDR	
6	EAMC Prev	Med Coord	X		MAJ [REDACTED] ^{b6} 18 NOV 1988		CDR	
7	EAFE Environ	Coord	X w/	cmt	Mr. [REDACTED] ^{b6} 16 NOV 1988	REMARKS:		
8	ENG	Coord	X w/	cmt	LTC [REDACTED] ^{b6} 15 NOV 1988			
9								
10								
11								
STAFF/ORGANIZATION			ACTION OFFICER			PHONE NO.	SUSPENSE DATE	DATE
JAJ-AL (27-1a)			MAJ [REDACTED] ^{b6}			[REDACTED]		18 NOV 1988
SUBJECT: Hazardous Material Report ^{b6}								
PURPOSE: To advise the Chief of Staff as to action on AR 15-6 investigation.								
<p>1. DISCUSSION: a. On 30 May 1988, LTC [REDACTED] ^{b6} was directed to informally investigate allegations of mishandling of hazardous waste in Eighth Army (Tab A). His findings are at Tab B. Essentially, he found that the specific allegations made by Mr. [REDACTED] ^{b6} disgruntled former employee, were unfounded. He also found, however, that Eighth Army has no hazardous material program to speak of; hazardous material management involves many different agencies and staff sections; and there is no central authority at HQ, Eighth Army, to develop, implement, and oversee such a program. His in-depth review of the situation is at Tab C, and his recommendations for remedying the situation are at Tab D. Essentially, he recommends we determine the standards we must meet, establish a central authority with overall responsibility for the hazardous material program; and implement the program ASAP. Recommendations 17 and 18 cannot be implemented because Mr. Brown is no longer in the command. Recommendations 19 and 30 are for information only; no action is needed on 19, and 30 has largely been accomplished. LTC [REDACTED] ^{b6} should be permitted to close the investigation without interviewing Mr. [REDACTED] ^{b6} as he requests in Recommendation 31. The real goal is to address the hazardous material situation.</p> <p>b. The Chief of Staff can approve or disapprove any or all of the findings and recommendations. There is no need to immediately approve or disapprove the findings and recommendations, but there is a need for command emphasis and action. Because of the number of areas involved (e.g., FEAK, J-4, JAJ, PAO, Preventive Medicine), input and cooperation from all of them will be required. The Environmental Engineer at FEAK would appear to be the appropriate point of contact to coordinate any action. My office stands ready to assist in developing an effective program.</p> <p>2. RESOURCE IMPACT: None.</p>								
						JAJ LOG # 2307-88 DISPATCHED ON: 18 Nov 88 FILE REF: Environmental Related Activities JAJ-0868 [REDACTED] ^{b6}		

3. RECOMMENDATION: That the Chief of Staff direct the findings and recommendations be staffed with the appropriate agencies and sections, and that the Environmental Engineer take the lead in developing an Eighth Army environmental program evaluating the feasibility of implementing ITC [redacted] recommendations, and recommending a plan of action.

b6



CARROLL J. TICHENOR
Colonel, JA
Judge Advocate

12 Encls

1. Tab A - Allegations by Mr. [redacted]
2. Tab B - ITC [redacted] Findings b6
3. Tab C - ITC [redacted] Review
4. Tab D - ITC [redacted] Recommendations
5. Tab E - J-1 Coordination
6. Tab F - J-3 Coordination
7. Tab G - J-4 Coordination
8. Tab H - PAJ Coordination
9. Tab I - RMJ Coordination
10. Tab J - EAMC Coordination
11. Tab K - EAFE Coordination
12. Tab L - ENG Coordination



DEPARTMENT OF THE ARMY
U.S. ARMY MATERIEL SUPPORT CENTER, KOREA AND CAMP CARROLL
APO SAN FRANCISCO 96460-0288

EANC-MS-C-ST

8 September 1987

SUBJECT: Correct Safety Violation.

TO: Director, Materials Transportation Bureau,
U.S. Department of Transportation 4007th St., SW.,
Washington, D.C. 205090

U.S. Department of Labor Occupational Safety and
Health Administration
ATTN: Safety/Transportation,
Washington, D.C. 20310

U.S. Army Safety Officer
ATTN: CSSG-PR, Mr. [REDACTED] 66
Safety/Transportation, Fort Rucker, AL 36360

Congressman NORM D. DICKS
House of Representative Room No. 242P
Washington, D.C. 20515

1. Request your assistance in correcting an extreme Hazardous Problem Area in Shipping of Hazardous Material and other Freight.
2. Personnel processing Hazardous Materials for Shipping are unable to read, write or understand English, for 5 years, I have try to place personnel in Hazardous Material Training, during the past two(2) years, two Korean Employees have satisfactory completed training as required, IAW, 49 title code of Federal Regulation and TM 38-205, Preparation of Hazardous Material for Military Air Shipment. The other personnels are unable to understand the two Regulation and above (EX 1, 2) most have failed the Hazardous Material Course from one to three times (EX 3, 4), at the present time all are processing Material and were not reassigned from there position.
3. I have submitted a list (EX 5) of personnel requiring special training in Hazardous Materials and Standard Form 52's for two of the personnel to be reassigned from there present position into a position which require less use of the English Language and less technical skills, when the Korean employees learn of this, they stages two sitdown work storages, and threatening to go on strike,

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if I was not remove from my position and a waiting petition was submitted concerning this, management keep me assigned to the position, but I was not to pass any instructions to KN employees or to enter the Transportation Work Area at any time (EX 6), and stated to the KN employees in (EX 7) Memorandum of Agreement Training would be provide in time, if required, with the system here in Korea that will be years, in the mean time, KN employees are Shipping Hazardous Materials and still unable to understanding English.

4. During the past eight (8) years, there have been hundreds of mistakes in Shipping Hazardous Materials both within Korea and to CONUS and other Oversea Areas, i.e. 1981, the Shipment of Milvans to CONUS of Hazardous Materials the Coast Guard, fined Matson Container Company for \$122,000 on that shipment, the case is on file in California with the Coast Guard, and KN employees are doing the shipments as always, Mr. [REDACTED] who failed the special training three times, was the one who processed the above shipment (EX 4).

5. Corrective or Remedial Action Sought.

a. Stop Shipping of Hazardous Materials from Camp Carroll, Korea, until personnel listed on (EX 5) are school training in Shipping Hazardous Material by all Modes of Transportation, that are used by MSC-K. If KN employees are unable to satisfactory completed training in all Modes of Transportation, then reassign them to other positions.

b. Establish a Traffic Management position at the MACOM level, (J-4 Transportation Division) to inspect on a quartly basis Freight Shipping, Hazardcus Material Shipments and the Training of Traffic Management Personnel in Traffic Management. 31

c. Reinstatement in the position as Transportation Officer with no limitation, IAW my position description.

d. Conduct an on-site inspection of Freight Operation at Camp Carroll, Korea. The inspection must be conduct by personnel knowledgeable in Hazardous Material and Oversea Freight Shipment to include myself on this on-side inspection, I am due to return to CONUS in November 1987, my address an phone in CONUS is: 5332 Frances Ave, N.E., Tacoma, WA 98422, Phone: [REDACTED] b6
My work site: Traffic Manager, Naval Supply Center, Bremerton, Washington.

e. The bottom line is if, KN employees are allowed to process Hazardous Materials for Shipments, who are unable to read Regulations in English then, Material Support Center, is asking for serious problems, which can be in personnel lifes and property, damages into the millions.

[REDACTED] b6
Transportation Officer
USASMC-K & CC
APO SF 96460-0286



HEADQUARTERS, UNITED STATES FORCES, KOREA
APO SAN FRANCISCO 96301-0010



REPLY TO
ATTENTION OF:

CJ-CC

28 October 1988

MEMORANDUM FOR: SJS

SUBJECT: Report of AR 15-6 Investigation

1. The Investigating Officer coordinated with MAJ [REDACTED]^{b6} the Legal Review Officer on 27 October to provide additional information. The findings are:
 - a. EUSA has not developed regulatory guidance for the management of hazardous material and hazardous waste handled by US Army operations in Korea. (Substantiated)
 - b. EUSA has not delegated staff responsibility or a focal point for overall management of hazardous material and hazardous waste programs in Korea. (Substantiated)
 - c. EUSA has not developed contingency plans for the prevention of and response to a sudden and non-sudden release of hazardous material and hazardous waste. (Substantiated)
 - d. EUSA Staff Judge Advocate has not reviewed the Ministry of Health and Social Affairs Environmental Standards and Korea's Environmental Preservation Laws to define EUSA environmental compliance standards. (Substantiated.)
 - e. It is unsubstantiated that Mr. [REDACTED]^{b6} rights were violated by the chain of command or that actions by 19th Support Command and MSC-K taken to remove Mr. [REDACTED]^{b6} from the workforce were improper.
 - f. It is substantiated that outside agency inspection reports on hazardous material and hazardous waste management were not properly disseminated nor corrective action taken in a timely manner.
 - g. It is substantiated that the Occupational Safety Health Act (OSHA) Program is not properly supported.
 - h. It is unsubstantiated that a Korean national employee paid a bribe to a civilian personnel officer in order to gain employment as alleged by Mr. [REDACTED]^{b6}
 - i. It is unsubstantiated that unqualified personnel at MSC-K, Camp Carroll were certifying the DD 1387-2 for air shipment of hazardous cargo as alleged by Mr. [REDACTED]^{b6}
 - j. It is unsubstantiated that hundreds of violations were made in the air shipment of hazardous material and hazardous waste as alleged by Mr. [REDACTED]^{b6}

CJ-CC

SUBJECT: Report of AR 15-6 Investigation

k. It is unsubstantiated to halt shipments of hazardous material or hazardous waste by any surface means from Camp Carroll, MSC-K as alleged by Mr. [REDACTED]. The packing and safe handling of hazardous cargo is being done IAW TM 38-250 and AFR 71-4. However, the investigation report indicates areas of concern and need for chain of command emphasis.

l. It is unsubstantiated that KN/US personnel handling or processing hazardous material must have completed a formal Department of Transportation School course of instruction as alleged by Mr. [REDACTED]. ^{b6}

m. It is substantiated that Mr. [REDACTED] ^{b6} used abusive language around and directed at Korean national employees and his DAC supervisor. Mr. [REDACTED] ^{b6} created a negative work environment by his actions toward subordinates. (See page 22.)

n. It is substantiated that Mr. [REDACTED] ^{b6} as the Transportation Officer failed to establish an informal hazardous material training program and document the training, required by TM 38-750.

o. It is substantiated that qualified staffs at EUSA, 19th Support Command and MSC-K have not inspected hazardous material management in an integrated and coordinated staff effort. In depth inspections are required.

2. With regard to paragraph b(1), (2) of the SJA comments, it's a shame. This rests with the chain of command and its failure to realize and find out how Mr. Brown treated Korean national employees and others. Paragraph (3) is the responsibility of CDR MSC-K and 19th Support Command.

3. As the Investigating Officer I have no intention of discussing anything with Mr. [REDACTED]. ^{b6} Mr. [REDACTED] cannot provide any relevant information to this AR 15-6. The evidence against Mr. [REDACTED] in this report is overwhelming. I recommend the AR 15-6 be read with attached evidence reviewed.

4. As I have stated in the course of the investigation, hazardous material and management thereof is a complex issue as discussed on page 15. EUSA and subordinate staffs have a lot of work to establish a hazardous material program. It will take time, resources, delineation of staff responsibilities and inspections.

5. I have no objections to the release of my name as the Investigating Officer or the report to outside agencies, Congressmen and Mr. [REDACTED]. Final release authority remains with CS, EUSA. ^{b6}

[REDACTED]
[REDACTED] ^{b6}
CIC, FA
AR 15-6 Investigating Officer

DISPOSITION FORM

For use of this form, see AR 340-15; the proponent agency is TAGO.

REFERENCE OR OFFICE SYMBOL

CJ-CC

SUBJECT

AR 15-6, Hazardous Cargo MSC-K

TO

Commander
HQ EAST, ATTN: DOL
APO SF 96301

FROM

LTC [REDACTED] b6
USFK C/J3, CJ-CC
APO SF 96301-0009

DATE

10 August 1988

CMT 1

1. The informal AR 15-6, attached is forwarded for your review and action. Chief of Staff EUSA is the directing authority.
2. A draft copy less evidence and statements were provided to J-4 Transportation Div, and Chief of Staff, 19th Support Command, 9 Aug 88.
3. POC is LTC [REDACTED] CJ-CC, [REDACTED] b6

[REDACTED] b6
LTC, FA
AR 15-6 Investigations Officer