Message

From: Frank Vera Ex. 6 Personal Privacy (PP)
Sent: 1/1/2015 4:55:53 AM
To: Stone, Linda@Waterboards [linda.stone@waterboards.ca.gov]; Joe Gardella Ex. 6 Personal Privacy (PP)
CC: Aycock, Mary [Aycock.Mary@epa.gov]; Burke, NadiaHollan [Burke.NadiaHollan@epa.gov]
Subject: George AFB Family Housing - pesticides "solid waste" under RCRA Section 1004(27)
Attachments: 2012- 05-28 Superfund Report - Kansas Army Ammunition Plant KSAAP - Pesticides.pdf; 2012-04-30 EPA to Army - Kansas Army Ammunition Plant KSAAP - Pesticides.pdf; 2011-11-01 Army to EPA - Kansas Army Ammunition Plant KSAAP - Pesticides.pdf

The attachments are regarding the EPA's conclusion that pesticides can be classified as "solid waste" under RCRA Section 1004(27).

Unless I am misreading the documents, it appears to be the EPA's conclusion that the pesticides are no longer protected under "intended use" when the structures are demolished or are to be demolished. Because of this, the chemical's "intended use" is no longer applicable, and the pesticides become "solid waste" and subject to RCRA.

"EPA has named aldrin and dieldrin as hazardous solid waste materials. If quantities greater than 1 pound enter the environment, the National Response Center of the federal government must be told immediately."
http://www.atsdr.cdc.gov/phs/phs.asp?id=315&tid=56#bookmark09

- Considering the reported levels of aldrin and dieldrin at the George AFB's "Family Housing" and that these pesticides were used liberally base-wide for years, hasn't more than 1 pound been released into the environment at George AFB?
- Was the National Response Center notified by the AF of the release of aldrin and dieldrin?
- How did the AF dispose of the aldrin and dieldrin when the AF stopped using it?
- How much aldrin and dieldrin, and how, did the AF dispose of at George AFB?

When the AF stopped using DDT at George AFB they buried it.

KBs	Subject or Title	Author / Author Affiliation	Document Date	AR #
5,101	Phase I, Records Search Report, Vol I of II	CH2M Hill	01/01/1982	3

Page 29
"The use of DDT was discontinued in 1962."
Page 29
"although a large quantity of DDT was reportedly buried east of the present sewage percolation ponds."
Page 48
"Site No. 8—8 — located east of alert hangar and southeast of Site No. 5. An unverified report of DDT, copper sulfate, and leaded paint disposal in - this site was made."

Happy New Year!
I hope that this helps.

Frank Vera

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