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Agent Orange Investigative Report Series, No. 16

Contract: VA-101-12-C-0006



INVESTIGATION INTO ALLEGATIONS OF AGENT ORANGE AT FORT McCLELLAN, ALABAMA

Compensation Service
Department of Veterans Affairs
810 Vermont Ave., NW
Washington, DC 20420

A. L. Young Consulting, Inc.

Alvin L. Young, PhD

Kristian L. Young, MA

April 2014





A. L. Young Consulting, Inc.
1810 Tranquility Road
Cheyenne, WY, 82009-2903

April 28, 2014

Mr. Michael Pharr
Contract Officer's Representative
Compensation Service
Department of Veterans Affairs
810 Vermont Ave., NW
Washington, DC 20420

Dear Mr. Pharr:

Please find attached to this letter the report: **Investigation into Allegations of Agent Orange at Fort McClellan, Alabama.** This report is the sixteenth (16) of many reports that will be prepared in fulfillment of Contract VA-101-12-C-0006, Development of an Archival Directory of Agent Orange Documents. The investigative reports are supported by the archival research. The goal of developing the directory is to search and identify the thousands of documents, reports, and correspondence located within our National Archives and Records Administration and other document repositories relating to the use of "Tactical Herbicides," including Agent Orange, outside of Vietnam. Using documents from the repositories, reports are prepared on topics requested by the Compensation Service.

In the case of Fort McClellan, Alabama, the Compensation Service has not had a comprehensive search of the historical records that were dispersed to facilities across the United States, or comprehensive reviews of the scientific literature and environmental studies as they relate to allegations by Vietnam-era veterans of potential exposure to Agent Orange and its associated dioxin. Thus, the Department of Veterans Affairs has depended on minimal documentation in determining the validity of veterans' claims. Clearly, it is beneficial to all parties to have all the available historical records and scientific studies related to events involving possible exposure to Agent Orange at Fort McClellan.

Examination of historical records and the records developed for the closing of Fort McClellan in the late 1990's did identify commercial herbicides and insecticides that had been registered and approved for use by the Department of Defense. These records did not identify Agent Orange or other tactical herbicides as having been sprayed, stored or disposed of on Fort McClellan or its associated field training areas.

Sincerely,

Alvin L. Young, PhD
Professor of Environmental Toxicology
Colonel, USAF (Retired)

DISCLAIMER FOR VA REPORTS

The conclusions reached in this report are based upon a comprehensive review of the historical records maintained in the publicly available files of the National Archives and Records Administration, and other archival repositories. However, the conclusions reached do not necessarily represent those of the Department of Veterans Affairs or any other Department or Agency of the United States Government.

This report is part of the Agent Orange Investigative Report Series, and should be considered as an amendable or living document. If additional authenticated documents or records are found that address the topic of this report, a re-evaluation of the conclusions may be necessary.

INVESTIGATION INTO ALLEGATIONS OF AGENT ORANGE AT FORT McCLELLAN, ALABAMA

EXECUTIVE SUMMARY

Examination of historical records and the records developed for the closing of Fort McClellan did identify commercial herbicides and insecticides that had been registered and approved for use by the Department of Defense. These records did not identify Agent Orange or other tactical herbicides as having been sprayed, stored or disposed of on Fort McClellan or its associated field training areas.

INTRODUCTION

In the March 2014 issue of the American Legion Magazine, there was an allegation that Agent Orange had been used and stored at Fort McClellan, Alabama [1]. The American Legion subsequently passed Resolution No. 95th which covers environmental exposures including Agent Orange and references Fort McClellan. The American Legion is on record supporting the Fort McClellan Health Registry Act [2]. Blogger Susan Katz Keating has repeatedly noted: “*If you went through Ft. McClellan, Alabama...I want to hear from you. Here's why. We were exposed to toxic substances. Big Time...the McClellan Cocktail included depleted Uranium, sarin gas, mustard gas and various other bacterial, nerve and chemical agents. And let's not forget that old standby, Agent Orange*” [3]. An examination of the comments received by the Keating Blog between July 2010 and May 2013, confirmed that 8 of 271 comments detailed their exposure to Agent Orange. The eight Vietnam-era veterans claimed “stateside exposure” to Agent Orange at McClellan during the months of June 1966 and July 1967, and the years of 1972 and 1978. One female veteran claimed that her unit was repeatedly forced to march in an area at Fort McClellan in June 1967 where “*Agent Orange was tested daily*” [3].

SEARCH OF AVAILABLE HISTORICAL RECORDS

In order to examine the validity of the allegations, it was necessary to examine the historical records. The search for documentation supporting the Fort McClellan allegations involved searching the following potential information sources:

- A search was conducted of more than a thousand documents from the Army Chemical Corps stored at the National Archives and Record Administration (NARA) in College Park, Maryland. The Department of the Army's research on tactical herbicides was conducted primarily by the Army Chemical Corps' Plant Sciences Laboratory, Fort Detrick, Frederick, Maryland and its predecessors;
- The United States Joint Services Record Research Center (JSRRC), Alexandria, Virginia was contacted with the assistance of the Deployment Health Support Directorate, Deputy Under Secretary of Defense (Installations and Environment), Department of Defense, Washington;
- The available records of the United States Army Toxic and Hazardous Materials Agency (USATHMA) includes records on the use of commercial herbicides at Fort McClellan, Alabama;
- The publically available files at NARA includes the Air Force Judge Advocate Agent Orange Records from 1961 – 1983, the Department of State's Records of the Southeast Asia Bureau, and the Department of State's Foreign Affairs Records;
- The Agent Orange Collection at the National Agricultural Library, Bethesda, Maryland is a collection that contains a large number of reports prepared by the US Army Chemical Corps, the 7th Air Force, and the Air Force Logistics Command on the tests and evaluation of the tactical herbicides, their potential use outside of Vietnam, and the environmental fate, and disposition, including storage and disposal of Herbicide Orange;
- The Armed Forces Pest Management Literature Retrieval System (AFPMR-LRS), US Army Garrison - Forest Glen, Silver Spring, Maryland was carefully searched. This collection consists of more than 130,000 documents in searchable PDF formats such as trip reports involving the pest control programs of all US Military Installations worldwide beginning in late 1950s through 2011. These reports document pest problems, operations concerning the use of AFPMR-approved pesticides (including herbicides), and reports of storage, approved methods of application of herbicides, and for the disposal of excess or surplus pesticides;
- The Office of Air Force History, Bolling Air Force Base, Washington DC, and the Office of History, Air Force Logistics Command, Wright-Patterson Air Force Base, Ohio were additional sources for information on tactical herbicides, Operation RANCH HAND, Operation PACER IVY, and Operation PACER HO. This includes boxes that contain information on where tactical herbicides were used or shipped outside of Vietnam, or contain the records collected by the Air Force Office of History in

preparation for the 1982 book **OPERATION RANCH HAND: The Air Force and Herbicides in Southeast Asia, 1961-1971**, by William Buckingham. The references and messages cited in the book were collected and placed in the NARA archives;

- Inquiries related to the transport, use, storage, and burial of herbicides at Fort McClellan were made with the Fort Detrick Records Manager and Records Holding Area Manager, the US Army Medical Research Institute of Infectious Diseases, the US Army Medical Research and Materiel Command, and the Institute for Public Health with the US Army Public Health Command;
- An examination of the records obtained and prepared by the Agency For Toxic Substances and Disease Registry (ATSDR), Centers for Disease Control and Prevention, Atlanta, Georgia; and,
- An examination of pertinent CERCLA documents prepared by the United States Environmental Protection Agency. The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) is a United States federal law designed to clean up sites contaminated with hazardous substances as well as broadly defined “*pollutants or contaminants.*” CERCLA documents are available for Fort McClellan.

HISTORY OF FORT McCLELLAN DURING THE VIETNAM ERA

Fort McClellan was located in Calhoun County, northeastern Alabama. The early history of the Fort coincided with the government’s interest in the Anniston Alabama community beginning as early as 1883 [4]. Acquisition of land in 1912, 1917, and 1919 resulted in the establishment of Camp McClellan, while additional land acquisitions in 1940 resulted in the permanent establishment of the Fort. In 1951, Fort McClellan was selected as the new home of the Chemical Corps School and the training in chemical, biological and radiological (CBR) warfare. The Army Combat Development Command Chemical, Biological, Radiological Agency moved to Fort McClellan in 1962. Students from all branches of the military service were trained in these programs until they were deactivated in 1973 [4]. In 1951 the Women’s Army Corps selected Fort McClellan as its permanent home, and remained there until it was disestablished in 1978 [4].

The mission of Fort McClellan was changed in 1966 as the US Army School/Training Center and subsequently the US Army Garrison Command, Fort

McClellan [4]. It subsequently became the home of the US Army Training and Doctrine Command; the US Army Military Police School; the US Army Chemical School and Training Center; the US Navy Chemical, Biological and Radiological Defense and Disaster Preparedness School; the US Air Force Civil Engineer Disaster Preparedness School; the 142nd Ordnance Detachment (Explosive Ordnance Disposal); and a training facility for US Army Reserve and National Guard Units [4].

In 1999, Fort McClellan was closed under the Base Closure and Realignment Commission's (BRAC) decisions. During the Vietnam Era and the years immediately after, Fort McClellan was home for an average population of about 10,000 military personnel. More than 500,000 men and women went through training at Fort McClellan in its years of operation [4]. Clearly its history suggested that the military men and women who were stationed at Fort McClellan had many opportunities of training in areas contaminated by the long use of the area for Army field training in chemical weapons [4]. The Fort McClellan Health Registry Act was introduced to Congress with the intent of the Department of Veterans Affairs establishing a registry of persons who were exposed to chemical agents [2]. However, the allegation that Agent Orange was tested, used, or disposed of at Fort McClellan has never been established.

RESULTS FROM HISTORICAL, US ARMY AND ATSDR RECORDS

The results of Department of Defense records searches did not identify Fort McClellan as a site where the Army Chemical Corps tested, stored or disposed of Agent Orange. The 2006 Report on **The History of the US Department of Defense Programs for the Testing, Evaluation, and Storage of Tactical Herbicides**, was “*an official compilation of locations and dates outside of Vietnam where the Department of Defense used herbicide agents, including Agent Orange, as well as locations and dates where DoD personnel were likely exposed to these Agents*” [5]. The report does not identify Fort McClellan for any activity involving Agent Orange or any of the tactical herbicides. The Joint Services Records Research Center researches Army, Navy, Air Force, and Coast Guard records containing historical information on individual units within these branches of service related to stressful events described by veterans. Requests by Compensation Service have been made on behalf of veterans for the JSRRC to

search their unit records at Fort McClellan to see if verification of Agent Orange exposure could be validated. The JSRRC provides VA with a summary of its findings but does not evaluate evidence, render opinions, make conclusions, or decide the merits of a claim [6]. The JSRRC has been unable to establish that Agent Orange was listed on any military personnel records or unit records assigned at Fort McClellan.

A search of the Armed Forces Pest Management Board Literature Retrieval System did identify historical documents of the US Army Environmental Hygiene Agency (USAEHA), Aberdeen Proving Ground Maryland that described the monitoring of commercial insecticides in environmental samples collected at Fort McClellan in the 1970s [7]. The pesticides found in the Fort McClellan samples included DDT, chlordane, heptachlor, dieldrin, aldrin, malathion, and diazinon, all commercial insecticides that had been used extensively in base housing, and for insect control in field training areas on the Fort's more than 45,000-acre reservation [7]. No analyses were done on polychlorinated biphenyls (PCBs), 2,4,5-T or pentachlorophenol [7].

In 1977, the US Army Toxic and Hazardous Material Agency (USATHAMA) and the USAEHA conducted an installation assessment consisting of records reviews, personnel interviews, and field inspections and sampling. The field testing for chemical warfare agents was negative in all known samplings, and the field areas were cleared for surface usage [8]. However, USATHAMA did find records on the use of commercial herbicides at Fort McClellan for the years 1974 – 1976 (see Table II-9 below from the USATHAMA report).

Table II-9. HERBICIDES AND QUANTITY USED AT FORT McCLELLAN [8]

Name	1974	1975	1976
Silvex*	8,000 gallons	18,480 gallons	
2,4-D*	7,200 gallons	6,000 gallons	4,800 gallons
2,4,5-T*	1,800 gallons		10,000 gallons
DMA**	12,000 gallons	4,000 gallons	
Picloram 160		4,000 gallons	
Tordon 101***		20,300 gallons	

*For woody brush, and herbaceous and aquatic weed control.

**Disodium methanearsonate for control of sandbur, cocklebur, Johnson grass along roadways and communication lines.

***Tordon 101, a mixture of picloram and 2,4-D for the control of dense brush on field ranges and target areas.

The herbicides 2,4-D, 2,4,5-T, and picloram were also components of the tactical herbicides used in Vietnam. However, their uses at Fort McClellan were as commercial herbicides, registered by the United States Environmental Protection Agency, approved for use by the Armed Forces Pest Management Board, and under the direct supervision of a certified pesticide applicator [6].

The publically available files at NARA included the Air Force Judge Advocate Agent Orange Records from 1961 – 1983, the Department of State’s Records of the Southeast Asia Bureau, and the Department of State’s Foreign Affairs Records were searched. No records were found that supported the allegations that Agent Orange was tested, used or disposed of at Fort McClellan. Likewise the Agent Orange records maintained at the National Agricultural Library in Beltsville Maryland do not support the allegations.

With the planned closure of Fort McClellan through the BRAC Commission, the Army initiated investigations into the environmental status of former Post property. The Army has the authority to dispose of facilities and property ensuring that their future use is not compromised by potential environmental hazards. Such environmental cleanup and property reuse program began with an Environmental Baseline Study in 1995 of the entire Fort McClellan facilities and land, including all CBR training areas [4]. Fortunately, in 1986 USAEHA had identified all solid waste management units as required under the Resource Conservation and Recovery Act (RCRA) and an additional Preliminary Assessment by USATHAMA identified 62 active and inactive Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites contaminated with hazardous substances considered as “*pollutants or contaminants*” [9]. A careful examination of the descriptions for each of the 62 CERCLA sites did not identify the disposal of dioxins, pesticides or Agent Orange [10].

From 1999 and through 2008, the Agency for Toxic Substances and Disease Registry repeatedly assessed the issue of exposure to toxic substances at Fort McClellan [11]. In their final **Follow-up Health Consultation** to include lands associated with Anniston Army Depot, the Agency did not identify any completed exposure pathways posing public health hazards [11].

SUMMARY AND CONCLUSIONS

Every military installation within the Department of Defense has ongoing regulatory requirements overseen by the DoD (Installations and Environment), State Environmental Agencies, and Federal Environmental Agencies including the Environmental Protection Agency and the Agency for Toxic Substances and Disease Registry. The RCRA and CERCLA require the installation to monitor any potential environmental or public health hazard, and to take action to minimize public health exposure.

The closing of any Department of Defense installation requires a lengthy process involving a Baseline Environmental Survey to ensure that any environmental or public health hazard has been identified and remediated. For more than four decades prior to closing in 1999, Fort McClellan had adhered to the regulatory environmental requirements, including an extensive community environmental affairs program.

Examination of historical records and the records developed for the closing of Fort McClellan did identify commercial herbicides and insecticides that had been registered and approved for use by the Department of Defense. These records did not identify Agent Orange or other tactical herbicides as having been sprayed, stored or disposed of on Fort McClellan or its field training areas.

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BRIEF BIOGRAPHY OF THE AUTHORS

For more than 40 years, Dr. Alvin L. Young has been involved in issues surrounding the use of Agent Orange and other tactical herbicides in Vietnam. He completed his PhD in Herbicide Physiology and Environmental Toxicology at Kansas State University in 1968. In his 21 years with the USAF (obtaining the rank of Colonel), he was involved with the testing and evaluation of the equipment used in Operation RANCH HAND, Vietnam, and with the environmental and human health studies with the School of Aerospace Medicine and the Department of Veterans Affairs. He served as a Science Advisor on environmental issues including Agent Orange with the President's Office of Science and Technology Policy. He was the Director of the Department of Energy's Center for Risk Excellence. He was a non-resident Visiting Professor with the University of Oklahoma, 2001-2007, and has served as the Senior Consultant on Agent Orange for the Office of the Deputy Under Secretary of Defense (Installations and Environment). He has more than 350 publications in the scientific literature, including five books on issues related to Agent Orange and/or dioxins and furans. From 2000 to 2012, He was the Editor of the international journal *Environmental Science and Pollution Research*.

For the past ten years, Kristian L. Young has been the Principal Researcher for A.L. Young Consulting. He received his Bachelor of Arts in Political Science from DePaul University, Chicago (Magna Cum Laude, Phi Kappa Phi, and Pi Sigma Alpha). He received the Master of Arts in International Relations in 2010 through Webster University's Global Program having studied in Europe and China. He has provided support to the company in areas of public policy, technical issues, archival research, and the coordination of national and international projects.