



OFFICE OF SENATOR SABINA FLORES PEREZ

Chairperson

Committee on Environment, Revenue and Taxation, Labor, Procurement,
and Statistics, Research, and Planning

I Mina'trentai Sais Na Liheslaturan Guåhan • 36th Guam Legislature

Sent by electronic mail

October 18, 2021

Walter Leon Guerrero
Administrator
Guam Environmental Protection Agency
17-3304 Mariner Avenue
Tiyan Barrigada, GU 96913

Subject: AAFB Open Burn/Open Detonation Draft Permit GUS002

Håfa Adai Administrator Leon Guerrero,

I am writing to register my strong opposition to the AAFB draft Open Burn/Open Detonation (OB/OD) permit for reasons outlined in this letter. I respectfully request the following:

- prohibition of open burning and denial of the open burning permit
- conducting environmental impact studies, which includes but not limited to, sampling fish tissue and biological, physical, and chemical indicators of water quality prior to processing the application
- facilitation and requiring the use of alternative technologies in treatment of energetic wastes
- strengthening the groundwater monitoring and air emission detection
- developing a compliance and monitoring plan
- non-concurrence of clean closure
- provision of community notifications
- re-opening the public comment period

The open burn/open detonation pit is sited in the north near our island's two most populated villages of Yigo and Dededo. The draft permit would allow the release of hazardous chemicals such as lead, which has been banned in Guam since 1990, and highly carcinogenic substances such as strontium and uranium. Dioxin, which is an endocrine disruptor, carcinogenic in small quantities, and a persistent organic pollutant, has been known to be released as part of the emissions and has been detected in soils at OB/OD sites.

The most vulnerable, such as children and people with pre-existing heart and lung conditions, are most at risk from exposure to particulate matter. Long- and short-term exposures to fine particles or particulate matter of 2.5 microns and smaller (PM2.5) can harm people's health, leading to heart attacks, asthma attacks, and premature death.

Additionally, during the informational hearing, testimony was provided that "pyrotechnic compositions of magnesium/Teflon/Viton (MTV) are widely used in military flares and for igniting the solid propellant of a rocket motor, and comprise as much as 45% PFAS." Per- and Polyfluoroalkyl Substances (PFAS) are characterized as 'forever chemicals' due to their high resistance to naturally breaking down. The practice of open burning/open detonation will not aid in the breakdown of PFAS; rather, it will facilitate its release and dispersion, thus exposing our community to substances that can cause health effects such as cancer, liver damage, decreased fertility, and an increased risk of asthma and thyroid disease.

Open burn/open detonation pits are based on 'dirty technology' with 'virtually no emission controls' which have resulted in extensive contamination and staggering cleanup costs that can reach more than



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half a billion dollars at a single site. Across the US, the sites of open burning of hazardous wastes have led to 54 separate federal Superfund declarations and have exposed the people who live near them to dangers that will persist for generations. On Guam, one of the Superfund sites, Site 26 on AAFB, was previously used for open burning of hazardous waste. It is now, to this day, recognized as one the most contaminated sites.

Although open burning has not been conducted since 2002, according to testimony provided by GEPA, and the draft permit states that the open burn site was “decommissioned”, an open burn site is still included in the permit application. It is critical that open burning not be permitted. Once hazardous chemicals such as perfluorinated compounds are released, it is much more difficult to clean up. We have only one aquifer that our population relies upon for drinking water. Other communities whose water source has been contaminated in the US have had to rely on a steady supply of bottled water, which is not sustainable. The focus must be on prevention of pollution and contamination of our water, air, and food supply.

In 2019 *The National Academies of Sciences, Engineering, and Medicine* released a report documenting the existence of viable alternatives to dispose of energetic waste. The Department of Defense has implemented alternatives such as static detonation chambers and others in various communities throughout the US. These alternatives have been rigorously reviewed for safety concerns by the DoD and for environmental standards by USEPA, and these alternatives have been fully implemented for a number of years.

Open burning and open detonation of munitions are old and outdated practices; we can do better, and we should do better, for the safety of our people and for the generations that will inherit the land. The health and safety of our island's citizens and the impending environmental dangers as a result of this proposed application greatly compromise long-term economic and social advancement at the expense of short-term economic gains.

Severe environmental damages include chemical infiltration into our largest drinking water supply and air pollution due to virtually no regulation or control mechanisms planned to contain harmful substances that may be released into the air. Of great concern is the lack of information regarding the chemical composition of wastes and chemical by-products included with the permit application.

It behooves us to hold the entities that adversely affect our environment to the highest environmental standards. Oftentimes, this calls on us to commit to the hard and difficult work, to act on what we know is best for the health of our people. Building a relationship of true and real trust is essential. Transparency is essential. Our communities deserve to be made aware of what is being disposed of, so that we may act accordingly and in the best interests of those who will come after us.

I respectfully request that the public comment period be re-opened to allow the public adequate amount of time to review a voluminous application. Additionally, it is essential that “Federal and State agencies with jurisdiction over fish, shellfish, and wildlife resources and over coastal zone management plans, the Advisory Council on Historic Preservation, and State Historic Preservation Officers” are duly noticed and provide necessary input pursuant to 40 CFR Section 124.10.

I deeply urge you, as the Administrator of Guam Environmental Protection Agency, to assist this Legislative body in formally objecting to the application and continuation of this Open Burn/ Open Detonation Pit and to actively pursue the research, investment and implementation of alternative technologies that will have less of a negative impact to the health and well-being of our island's people. There are existing alternative technologies that are a better solution allowing for the avoidance of incineration and greater waste minimization. Unlike outdated methods of the open burning of wastes, like



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munitions, these alternative technologies are more recent and open the way for cleaner and safer technological advancements.

I am open to meeting and further discussing options to provide greater health and environmental protections for our people and island.

Sincerely,

Sabina Flores Perez

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Senator, *I Mina'trentai Sais Na Liheslaturan Guåhan*

cc: Governor Lourdes A. Leon Guerrero

cc: Speaker Therese M. Terlaje, *I Mina'trentai Sais Na Liheslaturan Guåhan*