



GUAM ENVIRONMENTAL PROTECTION AGENCY • *AHENSIAN PRUTEKSIÓN LINA'LA' GUÁHAN*
LOURDES A. LEON GUERRERO • GOVERNOR OF GUAM | JOSHUA F. TENORIO • LIEUTENANT GOVERNOR OF GUAM
WALTER S. LEON GUERRERO • ADMINISTRATOR | MICHELLE C. R. LASTIMOZA • DEPUTY ADMINISTRATOR

FEB 14 2022

Brigadier General Jeremy T. Sloane
Commander 36th WG/CC
Andersen AFB, Guam
Unit 14003
APO AP 96543-4003

RE: Resource Conservation and Recovery Act Permit for Andersen Air Force Base, Guam
Hazardous Waste Management Facility, Permit Number GUS002

Hafa Adai General Sloane,

This letter is to request your commitment to the following to supplement the requirements of the permit:

1. In support of the Guam Environmental Protection Agency's (Guam EPA) rigorous review, public involvement and hazardous waste permitting decision-making framework, Guam EPA requests that Anderson Air Force Base (AAFB) conduct a formal scientific analysis to assess the scope and magnitude of potential adverse human health and environmental impacts from proposed Open Burn/Open Detonation (OB/OD) activities. This request is proposed to ensure protection of human health and the environment and pursuant to regulations promulgated as part of Guam's authorized hazardous waste management program.

The proposed analysis should take the form of a comprehensive human health and environmental risk assessment report using approved USEPA or Guam EPA methods and procedures.

To facilitate completion, the risk assessment report should be preceded by a risk assessment protocol or workplan – in which the scope and site-specific methods and procedures used to characterize impacts from OB/OD operations will be proposed and submitted for Agency approval. The risk assessment should be designed consistent with current EPA Risk Assessment Guidance. The assessment will provide a quantitative estimate of the likelihood of adverse human health and environmental impacts from both historic and current OB/OD operations and permitted releases to the environment. Because regulatory agencies utilize risk assessments as a tool - the scientific findings from site or facility-specific risk assessments can be applied to not only characterize

potentially unacceptable health and environmental impacts, but to also inform potential hazardous waste permit controls and conditions; and

2. AAFB shall review/evaluate viable alternative technologies to replace open burning and open detonation. The results/findings of this alternative technology evaluation shall be provided to this Agency.

Furthermore, the Open Burn unit has not been operational since the early 2000s and must be closed pursuant to Guam Hazardous Waste Management Regulations Part VI.A (Adopts by reference 40 Code of Federal Regulations Part 264, §264.113 (Closure; time allowed for closure)). If AAFB needs to perform open burning in the future, it must submit a permit modification for a new Open Burn unit, and conduct an alternative technologies study for open burning.

Should you have any questions concerning the technical aspects of this letter, please contact my office at 300-4751/2.

Sincerely,


WALTER S. LEON GUERRERO
Administrator

cc: Ms. Sarah Diebel, Acting Environmental Flight Chief, 36 CES/CEV, AAFB
Mr. Roland Gutierrez, Acting Air & Land Programs Administrator, Guam EPA
Mr. Carl Goldstein, Guam Program Manager, USEPA Region 9
Ms. Dani Allen-Williams, Project Officer, USEPA Region 9
Mr. Mahfouz Zabaneh, Environmental Engineer, USEPA Region 9
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