

January 16, 2021

Travis Blake
Division of Air Pollution Control
Tennessee Department of Environment and Conservation
air.pollution.control@tn.gov

Regional Administrator Mary Walker
ATTN: César A. Zapata, Director
Land, Chemicals and Redevelopment Division
United States Environmental Protection Agency, Region 4
Zapata.Cesar@epa.gov

SENT BY ELECTRONIC MAIL



RE: Public comment opposing burning of PFAS and other highly toxic munitions wastes at Holston Army Ammunition Plant in Tennessee

Dear Mr. Blake and Administrator Walker,

The Tennessee Department of Environment and Conservation, Division of Air Pollution Control is reopening two existing major source operating permits issued to BAE Systems Ordnance Systems Inc. (BAE) at Holston Army Ammunition Plant, subject to provisions of the Tennessee Air Pollution Control Regulations. A major source operating permit is required by both the Federal Clean Air Act and the Tennessee Air Pollution Control Regulations. EPA will perform a 45-day review concurrently with the state public comment period. Both agencies are accepting public comment on draft conditions and permit modifications.

The proposed permit modifications include a condition that expressly prohibits open burning of asbestos, which we support, but the condition fails to address other highly toxic waste constituents in this same waste treatment stream, particularly PFAS. Exposure to PFAS has been shown to affect growth

and development, reproduction, thyroid function, the immune system, injure the liver and increase risk for certain cancers.

The current permit conditions allow Holston Army Ammunition Plant to annually open burn as much as 1,250,000 pounds of munitions wastes that may contain as much as 15% PFAS by weight. PFAS are not destroyed in an open fire and are therefore widely dispersed to the air and the surrounding environment where they accumulate in people, as well as fish, wildlife and food crops. At higher temperatures, poisonous hydrogen fluoride gas may be generated. Hydrogen fluoride is a listed hazardous air pollutant subject to regulation by U.S. EPA and authorized states under the Clean Air Act, as are other air emissions from open burning at Holston.

At other Department of Defense sites like the Blue Grass Army Depot in Kentucky, the military is expressly prohibited from open burning PFAS and dozens of other toxic wastes. Both Blue Grass and Holston are located in EPA Region 4. And we are adamant that Tennessee residents, workers and environment are afforded the same level of protection as their Kentucky neighbors.

Therefore, we request that the permit condition prohibiting open burning of asbestos (or other appropriate condition) be EXPANDED to include the following which are gleaned from the Blue Grass permit:

Specifically, the Permittee shall not treat, by either open burning or open detonation, munitions or wastes that contain any of the items or substances listed below:

- Hazardous waste from offsite sources
- Ammunition that is 0.50 caliber or smaller
- Municipal waste
- Dunnage
- Containerized gases
- Oil
- Pesticides
- Herbicides
- Ammonium perchlorates
- Dioxins or furans
- Titanium tetrachloride
- Polychlorinated biphenyls (PCBs)
- Flechettes
- Rounds containing submunitions
- White phosphorus
- Red phosphorous
- Colored smoke
- Hexachloroethane (HC) smoke
- Napalm
- Riot control agents
- Biological agents
- Choking agents
- Nerve agents
- Blood agents
- Blister agents
- Incapacitating agents
- Chemical warfare materiel

- Components of liquid filled rounds or chemical warfare materiel
- Nuclear components or devices
- Naturally occurring radioactive materials
- Depleted uranium (DU)
- Any liquids or items containing free liquids
- Asbestos
- Munitions wastes that are a potential source of Per- and polyfluoroalkyl substances (PFAS), including Teflon, Viton, and Viton-A. This also includes both short and long chain PFAS
- Waste Military Munitions with a different chemical composition from those already being treated at Holston

Source document: Hazardous Waste Facility Permit, Open Burning and Open/Buried Detonation (OB/OD) Section, Blue Grass Army Depot, KY8-213-820-105 AI: 2805 Activity: APE20040007, November 2018. Online at <https://cswab.org/wp-content/uploads/2018/12/Bluegrass-Army-Depot-OBOD-Final-Permit-Nov-2018.pdf>

IMPORTANT NOTE:

These public comments are not to be construed as supporting ANY open burning at Holston – the public notice specifies that regulators are only accepting comment on proposed conditions and permit modifications and our comments are submitted in this specific context.

Thank you for your careful consideration of our comments and recommendations.

Sincerely,

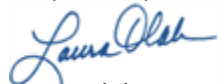
The complete list of nearly 300 co-signers, including representatives of 72 civic, environmental, veterans and health organizations, is enclosed as the following 9 pages of this .pdf document. As these comments are an open public record, we have not submitted street addresses to protect the privacy of individuals.

This national effort was coordinated by Citizens for Safe Water Around Badger – a grassroots organization that has been actively monitoring military cleanups for 30 years – in collaboration with Volunteers for Environmental Health and Justice in Tennessee.

OTHER SUBMITTALS:

Reference documents were too large and numerous to email as attachments so we have downloaded them on the following public webpage <https://cswab.org/action-alert-u-s-military-is-open-burning-pfas/>

Respectfully submitted by:



Laura Olah, Executive Director
 Citizens for Safe Water Around Badger (CSWAB.org)
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Pamela	Miller	Anchorage	AK	Alaska Community Action on Toxics
Eneshal	Miller	Burtonsville	Maryland	Benefit Manufacturing LLC DBA CROWN ACTIVATION
Erin	Briggs	Doyline	LA	Bio-Analytical Laboratories
Willi	Lehner	Blue Mounds	WI	Bleu Mont Dairy
Samantha	Hall	Cambridge	MA	Boston University School of Public Health
Wendy	Heiger-Bernays	Boston	MA	Boston University School of Public Health
KT	Andresky	Detroit	Michigan	Breathe Free Detroit
Jane	Williams	Rosamond	CA	California Communities Against Toxics
Robina	Suwol	Toluca Lake	California	California Safe Schools
Kathy	Gannett Thurstin	Vieques	Puerto Rico	Casa de Kathy
Don and Roberta	Timmerman	Milwaukee	Wisconsin	Catholic Worker at Casa Maria, Milwaukee
Lenny	Siegel	Mountain View	CA	Center for Public Environmental Oversight
Brenda	Vallee	Colfax	LA	Central Louisiana Coalition for a Clean & Healthy Environment
Jane	Maher	Middleton	WI	Citizens for Safe Water Around Badger
Teresa	Radermacher	Monona	WI	City of Monona (Wisconsin) Sustainability Committee
Dean	Hoegger	Sturgeon Bay	WI	Clean Water Action Council of NE Wisconsin
Shaina	Kasper	Montpelier	Vermont	Community Action Works
Sister Ruth	Battaglia CSA	Fond du Lac	WI	Congregation of Sisters of St. Agnes
Forest	Jahnke	Rolling Ground	Wisconsin	Crawford Stewardship Project
Diego	Calderon	Madison	WI	CSWAB
thomas	melvin	CHICAGO	IL	CSWAB
Laura	Olah	Merrimac	WI	CSWAB.org
Stephen	Brittle	Phoenix	AZ	Don't Waste Arizona
Mary	Gutierrez	Pensacola	FL	Earth Action, Inc.
Linda	Shosie	Tucson	AZ	Environmental Justice Task Force-Tucson
Gar	Smith	Berkeley	California	Environmentalists Against War
Stel	Bailey	Cocoa	FL	Fight For Zero, Inc
Alan	Muller	Red Wing	Minnesota	Green Delaware
Sue	Phelan	West Barnstable	MA	GreenCAPE
Lauren	Horton	Wilmington	NC	Independent Internal Medicine Physician
Craig	Williams	Berea	KY	Kentucky Environmental Foundation
Marcia	Halligan	Viroqua	Wisconsin	Kickapoo Peace Circle
Cindy	Carter	Appleton	WI	Kobussen

Paula	Montgomery	Pensacola	FL	League of Women Voters
Carol	Pulley	Gulf Breeze	FL	LWV
Laurene	Allen	Merrimack	NH	Merrimack Citizens for Clean Water
Katharine	Hodge	Merrimack	NH	Merrimack Citizens for Clean Water
Maria	Powell	Madison	Wisconsin	Midwest Environmental Justice Organization
Pat	Elder	Lexington Park	MD	Military Poisons
Jerry	Balmes	Roscommon	Michigan	Military Veterans Advocacy
Susan	Belanger	Gansevoort	NY	Military Veterans Advocacy, Inc., Legislative Director
Ayesha	Khan	Nantucket	MA	Nantucket PFAS Action Group
Virginia	Necochea	Santa Fe	New Mexico	New Mexico Environmental Law Center
Johnnie	Swagerty	Kingsport Tennessee	Tn	New Vision Youth Group
Deborah	Brown	Newburgh	NY	Newburgh Clean Water Project
Jennifer	Richmond-Bryant	Raleigh	North Carolina	North Carolina State University Department of Forestry and Environmental Resources
JOHN	LAFORGE	LUCK	WI	NUKEWATCH
John	Kraemer	Chippewa Falls	Wisconsin	PETA
Pauline	Hamilton	Reno	NV	PGS
John	Reuwer, MD	S Burlington	VT	Physicians for Social Responsibility
Vina	Colley	Portsmouth	Ohio	PortsmouthPiketon Residents for Environmental Safety and Security (PRESS)
Elizabeth	O'Nan	Chapel Hill	North Carolina	Protect All Children's Environment
Robert T	Block	Madison	Wisconsin	PSR
Vicki	Quint	Hillsboro	Missouri	Quint LLC
Kelly	Kearns	Madison	WI	Safe Skies Clean Water
Ann	Manning	Minneapolis	MN	Science & Environmental Health Network
Darryl	Malek-Wiley	NEW ORLEANS	LA	Sierra Club
Cindy	Boyle	Marinette	Wi	SOH2O
TYNNETTA	JACKSON	Milwaukee	Wisconsin	SOULS
Kathy	Hawes	Knoxville	TN	Tennessee Clean Water Network
Brandi	Prewitt	Nashville	Tennessee	Tennessee Environmental Council
Marylia	Kelley	Livermore	CA	Tri-Valley CAREs
Jorge	Colón	San Juan	Puerto Rico	University of Puerto Rico
Arnie	Leriche	Odcoda	MI	USEPA (retired - 38 yrs, Air Pollution Engineer)
Lauren	Price	New Port Richey	FL	Veteran Warriors
Anthony	Hardie	Washington	DC	Veterans for Common Sense

Larry	Meisgeier	Milwaukee	WI	VETERANS FOR PEACE--Chapter 102
Larry	Menkes CSBA	Warminster	PA	Veterans Gereen Job Initiative
Connie	Toohey	Kingsport	Tennessee	Volunteers for Environmental Health and Justice
Mark	Toohey	Kingsport	Tennessee	Volunteers for Environmental Health and Justice
Greg	Wingard	Covington	WA	Waste Action Project
Gloria	Griffith	Mountain City	TN	Watauga Watershed Alliance
Linda	Carlough	Butler	TN	Watauga Watershed Alliance
Kristen	Mello	Westfield	MA	Westfield Residents Advocating For Themselves (WRAFT)
Dave	Hansen	Green Bay	Wi.	Wi. State Senate retired
Claire Gervais	Beth Neary	Madison	WI	Wisconsin Environmental Health Network
Ann	Behrmann MD	Madison	Wisconsin	Wisconsin Environmental Health Network, PSR WI
Judy	Miner	Madison	WI	Wisconsin Netwrok for Peace and Justice
Al	Gedicks	La Crosse	Wisconsin	Wisconsin Resources Protection Council
Paul	Connett	Binghamton	Select an option...	Work on Waste, USA (AEHSP)
alice	slater	New York	NY	World Beyond War
David	Swanson	Charlottesville	VA	World BEYOND War
Kathleen	Hillman	Westfield	MA	WRAFT
Arnie	Leriche	Oscoda	MI	Wurtsmith AFB RAB - Community Member
Ashea	Mills	Gardiner	MT	yellowstone.education
Andrea	Rich	Marinette	WISCONSIN	
Sonja	Moskalik	Madison	Wisconsin	
Carolyn	Hawk	New Franken	Wisconsin	
Donette	Beattie	Merrimac	WI	
Amber	Britt	Elliston	Virginia	
Mickey	Bauer	Merrimac	WI	
Barbara	Andree	Soldiers Grove	WI	
Leslie	Spotz	Stephenville	TX	
Al	Dwars	Mazomanie	WI	
Kim	Diaz	Green Bay	WI	
Karolyn	Beebe	Madison	Wisconsin	
Allan	Peterson	Ashland	Oregon	
Amy	Bahena-Ettner	Sobieski	WI	
Angela	Raines	St. Louis	MO	

Anita	Wyli	Indianapolis	Indiana
Anita	Wylie	Indianapolis	Indiana
Ann I	Aurelio	West Sayville	New York
Anna	Pidgeon	Mazomanie	WI
Annie	Harrell	Kingsport	TN
Archie	Dudley	Clarksville	TN
Barb	Olson	Madison	WI
Barbara	Bailly	Madison	WI
Barbara	Olson	Madison	WI
Beth	Strom	Somonauk	IL
Bonnie	Roe	Mount Carmel	TN
Bonnie	Block	Madison	WI
Brandon	Dowd	Prairie Du Sac	Wisconsin
Brianna	Brazeau	Qest Bend	Wisconsin
Bridget	Walsh	Denver	CO
Bruce	O'Brien	Minneapolis	MN
cara	artman	Saint Louis	MO
Carla	Raushenbush	Madison	WI
Carol	Sills	Baileys Harbor	WI
Charlene	Kelley	Shreveport	Louisiana
charles	wilhelm	prairie du sac	wi.
Chris	Hanson	Merrimac	WI
Cindy	Verschay	Porterfield	WI
Dan	Melton	Madison	WI
Daniel	Patzner	Prairie Du Sac	WI
Daniel	Winger	Marinette	WI
Darlene	Schanfald	Sequim	WA
David	Dow	East Falmouth	Massachusetts
David	Fallow	Madison	WI
David	Gebauer	Madison	WI
David	Lewane	Milwaukee	WISCONSIN
David	Golladay	EL Paso	Texas
Delene	Hanson	Hales Corners	WI
Dennis	Mudloff	Grand Island	Nebraska

Donald	Pellett	Sauk City	WI
Donna	Winger	Marinette	WI
Donovan	Nelson	Clovis	Nm
Edward	Streff	West Bend	Wisconsin
Elise	Moser	Sauk City	Wisconsin
Elizabeth	major	Gulf Breeze	FL
Elizabeth	Icks	Cable	WI
Elizabeth	Gregory	Knoxville	Tennessee
Ellen	Paul	Prairie du Sac	WI
Ellen	Paul	Prairie du Sac	WI
Emily	Brammerson	Black Earth	WI
Faye	Patzner	Prairie Du Sac	WI
Frances	Dunham	Ashland	OR
Frank	Carvajal	Aliso Viejo	CA
Franklin	Berkowitz	Fitchburg	WI
Frederick	Jones	Madison	WI
gail	lamberty	sauk city	wi
George	Meyer	Madison	WI
Gerald	Roe	Mount Carmel	TN
Hannah	Lee	Madison	WI
Helen	Findley	Madison	Wisconsin
Hilda	Richey	Hillsboro	Wisconsin
India	Watkins	Shady Valley	TN
Ivy	Doner	Los Angeles	Ca
J. WESLEY	EDENS	JOHNSON CITY	Tennessee
Jackie	Thiry	Green Bay	WI
James	Grant	Boston	MA
James	Mulcare	Clarkston	WA
James	Roper	Madison	Wisconsin
Jamie	Olah	Chicago	Illinois
Jane	Hauser	SPRING GREEN	WI
Jeff	Kramer	Oshkosh	WI
Jeff	Melby	Portage	WI
Jeffrey	Lamont	Marinette	WI

Jenna	Toohey	Kingsport	TN
Jessica	Schultz	Loveland	OH
Jim	Toohey	Longmont	CO
Jim	Ryan	Westfield	MA
Jim	Bennett	Mazomanie	Wisconsin
Jody	Van Dam	Boscawen	NH
Joe	Maurer	Eau claire	WI
John	Hermanson	Sturgeon Bay	WI
John	Thornberry	Marinette	WI
John A	Munsen Jr	Colfax	Louisiana
Jolie	Jacobus	Columbus	WI
Judith	Brey	Reedsburg	WI
Judy	Skog	Madison	WI
Julia	Hall	San Francisco	CA
Julia	Hartjes	Verona	WI
Julianne	Gould	East Stroudsburg	Pennsylvania
June	Heston	Richmond	VT
Juniper	Sundance	Avoca	WI
Kara	Nelson	Philadelphia	PA
Karen	Richardson	Colfax	LA
Karen	Pighetti	Westfield	Massachusetts
Karen	Hardin	Greeneville	TN
Katharine	Odell	Madison	WI
Kathleen (Kathi)	Matthews-Risley	Sauk City	Wisconsin
Katie	McGrath	Ridgeway	WI
Kayla	Furton	Marinette	Wisconsin
Keith	Jung	Marinette	WI
Kelly	Lundeen	Shell Lake	WI
Kendall	Lins	Prairie du Sac	Wisconsin
kent	galloway	readstown wi	WI
kimberley	hoxie	highlands ranch	co
Kimberly	Clifton	Gladstone	MO
Kristina	Gray Counts	Franklin	Tennessee
Laura	Laselle	Westfield	MA

Laura	Olah	Merrimac	WI
Laurie	Martin	Merrimac	WI
Laurie	Hartjes	Verona	Wisconsin
Laurie	Hartjes	Verona	Wisconsin
Lawrence	Baldwin	Morristown	Tennessee
Levi	Wood	Madison	WI
Lisa	Lappin	El Segundo	California
Lisa	Parkes	Johnson City	TN
Lisa	Simon	St Croix falls	Wi
Lisa	Vieth	Kendall	WI
Liz	Mikutowski	Marinette	WI
Lynn	Shoemaker	Whitewater	WI
Lynn	Shoemaker	Whitewater	Wisconsin
Lynn m	Harthorne	Baraboo	WI
Lynne	Roberts	Baraboo	WI
Madeline	Canfield	Houston	TX
Maggie	Lamphear	Madison	WI
Mari Deen	Anderson	Oak Harbor - Whidbey Island	WA
Maria	Cerniauskas	Johnson City	TN
maria emilia	barragan calderon	Middleton	Wisconsin
Marian	Farrior	Sauk City	WI
Marie	Lewis	Peshtigo	Wis
Marina	Drake	Madison	WI
Marina	Steiner	Madison	Wisconsin
Mark	Giese	Racine	WI
Mark	Smith	OCONTO FALLS	WI
Marsha	Ryan	Westfield	MA
Marti	Prorok	Reedsburg	Wisconsin
Mary	Johannsen	Minneapolis	MN
Mary	Platten	Green Bay	WI
Mary	Hansen	Peshtigo	WI
Mary Carol	Solum	Merrimac	WI
Melanie	Sax	Fitchburg	WI

Melanie	Sax	Fitchburg	WI
Michael	Osley	Pensacola	Florida
Michele	Hopp	Merrimac	WI
Miguela	Fry	Verona	WI
Miguela	Smith Fry	Verona	WI
mike	cody	Baraboo	WI
Mike	Mikutowski	Marinette	WI
Mollie	Martinek	San Diego	California
Monica	O'Brien	Madison	WI
Nancy	Malmberg	Merrimic	WI
Naomi	Swerdlow	Pittsburgh	Pennsylvania
Noah	Bernays	SEATTLE	WA
Pamela	Blume	Indianapolis	IN
Paul	Herr	Madison	WI
Paul E and Nichelle	Martin	Baraboo	Wisconsin
PHIL	RAY	PRAIRIE DU SAC	WI
Renee	Rosario	Boulder	CO
RICHARD	MAGYAR	chippewa falls	WI
Richelle	McClain	Fort Myers	FL
Robert	Moss	Palo Alto	CA
Robert	Hendershot	Rockford	IL
Robin	Tamulynas	Tyngsboro	Ma
Rory	Cameron	Chippewa Falls	Wisconsin
Rose Marie	Dischler	Racine	WI
Rose Marie	Dischler	Racine	WI
Sally	Leong	Avoca	WI
Sally	Draze	Porterfield	WI
scott	cayley	deerfield	wi
Shawn	Martin	Dry Prong	Louisiana
Shirley	Haidinger	Madison	Wisconsin
Steven	Bletsch	Merrimac	WI
Su	estep	Kingsport	tn
Susan	Walker	Lake Arrowhead	CA

susan	gordon	Canon City	CO
Susan	Allen	Raleigh	NC
Susan	Michetti	mt horeb	wi
Susan	Savage	Madison	WI
Susan	Haebig	Wausau	Wisconsin
Susan	Slapnick	Madison	WISCONSIN
Suzanne	Kelly	N/A	IN
Suzanne	Cox	Fayetteville	NC
Suzy Clarkson	Holstein	Shorewood	WI
Tal	Gluck	Newburgh	NY
Tam	Brudzinski	Westfield	MA
Tamara	Bartolo	Seymour	TN
Tara	Trent	Church Hill	TN
Tara	Trent	Church Hill	TN
Terry	Kostiuk	New Bern	North Carolina
Theodora	Tanner	McMinnville	TN
Theresa	Johnson	Bettendorf	Iowa
Theresa	Bauer	Prairie Du Sac	WI
Theresa	Bauer	Prairie du Sac	WI
Thomas	Hill	Gilbert	Arizona
Timothy	Sprecher	Lake Mills	WI
Tom	Peckosh	Dubuque	IA
Walter	Hitt	Marinette	WI
Wayne	Wyckoff	Westfield	MA
Wendy	Carlson	Sauk City	WI
WILLIAM	WASER	REEDSBURG	Wisconsin
Witcher	Diana	Eau Claire	WI