



THE SECRETARY OF VETERANS AFFAIRS
WASHINGTON

November 19, 2004

The Honorable Lane Evans
Ranking Democratic Member
Committee on Veterans' Affairs
U. S. House of Representatives
Washington, DC 20515

Dear Congressman Evans:

I am responding to your request that the Department of Veterans Affairs (VA) establish a presumption of herbicide exposure for all veterans who served on Johnston Island in the North Pacific between 1971 and 1977.

Current law provides a presumption of herbicide exposure only for veterans who served in the Republic of Vietnam during the Vietnam era. That presumption was based upon (1) the many uncertainties associated with herbicide spraying during that period, (2) the lack of precise data concerning troop movements during combat operations, and (3) the government's inability to determine with an acceptable degree of precision whether an individual veteran was exposed to herbicides by the spraying.

We have carefully analyzed the information available regarding the storage and disposal of herbicides on Johnston Island, which, among other things, includes the ecological assessment enclosed with your letter and the information we obtained from The Alvin L. Young Collection on Agent Orange at the United States Department of Agriculture's (USDA's) National Agricultural Library. In addition, we attended a briefing regarding the storage and disposal of Agent Orange on Johnston Island conducted by Dr. Young. The enclosed fact sheet summarizes the information we obtained from USDA's collection and from Dr. Young.

Our analysis indicates that the government's storage of herbicides on Johnston Island does not raise the same identification concerns that confronted us in Vietnam. Rather, it is more closely associated with the storage of herbicides at military installations in the United States and the spraying that occurred along the Korean DMZ in the late 1960's. Herbicide exposures that occurred outside of Vietnam may be verified through evidence developed during the adjudication of claims for veterans' benefits. Accordingly, we conclude that a presumption of exposure is not warranted for veterans who served on Johnston Island.

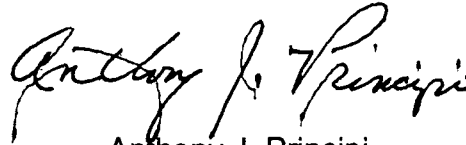
Page 2.

The Honorable Lane Evans

We note that very few veterans who served on Johnston Island had duties that involved the direct handling of herbicides. However, I assure you that we will continue to evaluate the facts and evidence on a case-by-case basis to determine whether disabled veterans were exposed to herbicides during service on Johnston Island. We will also publish information regarding the storage and disposal of herbicides on Johnston Island in our procedural manual to ensure that all VA decision makers are aware of the storage of herbicides on Johnston Island.

I appreciate your continued interest in this important issue.

Sincerely yours,

A handwritten signature in black ink that reads "Anthony J. Principi". The signature is written in a cursive style with a large initial "A".

Anthony J. Principi

Enclosure

Fact Sheet

Agent Orange on Johnston Island

- Approximately 1.5 million gallons of Agent Orange (AO) were stored on Johnston Island (JI) between April 1972 and September 1977, when they were incinerated at sea.
- There were approximately 25,000 55-gallon drums stored in rows stacked three high on about 3.5 acres on the northwest corner of the island. That storage location was selected because the east-to-west trade winds would rapidly disburse any airborne AO into the Pacific.
- Military contractors were solely responsible for site monitoring and redrumming and dedrumming activities. The storage area was fenced and off limits from a distance.
- The entire inventory of AO was screened for leaks daily. Leaking drums were re-drummed on a weekly basis. Fresh spillage was absorbed, and surface soil was scraped and sealed.
- Leakage of drums began in 1974. Between 1974 and 1977, the equivalent of the contents of 405 drums was leaked.
- The floor of the storage site was comprised of dense coral. Because of the composition and properties of coral, leaked AO was literally bound to the coral, providing little opportunity for AO to become airborne.
- A 1974 Air Force report found that the condition of the storage area provided evidence of the rapid identification of leaking drums, as few spill areas were observed.
- Soil samples in 1974 revealed that herbicide contamination was not detected outside of the storage yard except in close proximity to the redrumming operation.
- Water samples were collected and analyzed twice per month from 10 different locations.
- Contractors (not U.S. service personnel) performed the screening and redrumming activities and were responsible for the inventory.
- A 1978 Air Force Land-Based Environmental Monitoring study concluded that no adverse consequences of the minimal release of AO into the JI environment during the dedrumming operation were observed. The report further stated that "exposure to (land-based operations) workers to airborne 2,4-D and 2,4,5-T were well below permissible levels."