



The Advocate of South Carolina Small Business
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PRESS RELEASE

Date: April 20, 2018
From: South Carolina Small Business Chamber of Commerce
Subject: Chemical weapons, radioactive waste dumped in Atlantic Ocean
Oil exploration threatens environment, public and local economies
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Billy Keyserling, Mayor, Beaufort, SC 843-592-0400 (c)

**Chemical weapons, radioactive waste dumped in Atlantic Ocean
Oil exploration threatens environment, public and local economies**

Columbia, SC—New comments have been submitted to the National Marine Fisheries Service and the Bureau of Ocean Energy Management raising concerns that oil exploration in the Atlantic could trigger the release of highly toxic chemical agents and radioactive waste from official and unofficial ocean dump sites.

The comments (below), submitted by the South Carolina Small Business Chamber of Commerce come after the comment period closed last August.

“Government documents and first-hand accounts of munitions and radioactive waste being dumped off the Atlantic Coast from Massachusetts to Florida came to our attention only recently. Nine of the official dump sites are off the South Carolina coast,” said Frank Knapp Jr., president and CEO of the SC Small Business Chamber of Commerce. “There is a serious threat of seismic airgun blasting disturbing these materials, many in unofficial and unknown locations and all in deteriorated containers, and releasing them into the water. Commercial fishing, the public, local economies and even seismic ships and crews are in jeopardy.”

The supplemental comments call for the denial of permits for seismic surveys in the Atlantic unless the federal government can demonstrate that it knows where all disposed munitions and radioactive waste are located, research has been conducted to determine the impact seismic airgun blasting will have on the containers and materials at these dump sites, and appropriate mitigation procedures are mandated.

“Over the last couple years, people have asked me why I have been so opposed to seismic surveys off our coast,” said Mayor Billy Keyserling of Beaufort, SC. “But when I now tell them about the radioactive waste and munition dumps, they are horrified and ask what they can do to help.”

“The Isle of Palms was one of the first South Carolina coastal communities to write a proclamation opposing the offshore search for oil by seismic airgun blasting. We did not know that our waters were the dumping ground for munitions and radioactive waste. We cannot risk disturbing these materials and thereby impacting our pristine environment. Even the thought of this sickens me,” said Mayor Jimmy Carroll of the Isle of Palms that is just north of Charleston.

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Below are the supplemental comments of the South Carolina Small Business Chamber of Commerce.

April 19, 2018

Via email to ITP.Laws@noaa.gov and walter.cruickshank@boem.gov

Jolie Harrison
Chief, Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway, Silver Spring, MD 20910

Dr. Walter Cruickshank
Acting Director
Bureau of Ocean Energy Management
U.S. Department of Interior
1849 C Street, NW
Washington, D.C. 20240

RE: Comments on Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Geophysical Surveys in the Atlantic Ocean; RIN 0648–XE283, 82 Fed. Reg. 26,244 (June 6, 2017). Also comments and recommendations on the Bureau of Ocean Energy Management’s permitting process for seismic surveys in the Atlantic.

Dear Ms. Harrison and Director Cruickshank,

On July 5, 2017, comments regarding the above referenced matter were filed under my signature on behalf of the Business Alliance for Protecting the Atlantic Coast (BAPAC) of which I was the president and CEO at that time. The South Carolina Small Business Chamber of Commerce, which I am the president and CEO, is a member of BAPAC and thus was a party to the BAPAC comments of last year.

These supplemental comments pertain to the same matter referenced above.

Sea-Based Munitions Disposal

Following the filing of the comments of July 5, 2017, we became aware of the issue of possible munitions having been disposed in the Atlantic. However, only very recently have we obtained documentation from the Department of Defense (DoD) indicating that prior to the 1970s, sea-disposal of munitions containing materials used in chemical weapons as well as materials for conventional weapons was routine.

According to a [2009 Defense Environmental Programs Annual Report to Congress](#), 33 official munition dump sites were acknowledged off the East Coast of the United States. Five of these were off the coast of South Carolina. The report listed a total of over 17,000 tons of chemical agents disposed in those munitions dumps. These chemical agents included: lewisite, mustard, sarin, VX, arsenic trichloride, arsenic, phosgene, cyanogen chloride, cyanide, tabun, sulfur monochloride and other unknown agents.

Also, in that 2009 report, the DoD indicated that it “will continue to update the inventory as new information becomes available.” We have submitted an FOIA request to obtain any such updated information as well as specific coordinates of official sea-based munitions dump sites.

Our concern is that while the DoD officially acknowledges these munitions disposal sites in the Atlantic:

1. There is a likelihood that munitions were disposed in the Atlantic outside of these designated sites and thus there are no records of these unofficial disposal locations or the materials in these unofficial disposal sites,
2. Ocean currents could have carried these munitions from their original official or unofficial disposal sites thus adding to the uncertainty of exactly where these dangerous munitions are located today.

The importance of knowing the exact location of munitions in the Atlantic is acknowledged in a November 2016 DoD Report to Congress, “Research Related to Effect of Ocean Disposal of Munitions in the U.S. Coastal Waters”.

This report focused on the effects of potential recovery efforts of the sea-disposed munitions. The report reads:

Based on current research, the risk associated with recovering sea-disposed munitions appears to be far greater than the risk of leaving the munitions in place. Recovering sea-disposed munitions may cause them to either break apart and release their contents or detonate. Either scenario can have an adverse effect on human health and the environment. An accidental detonation during recovery can destroy habitat, including protected or sensitive corals, injure mammals and other sea-life, or result in injury to works or the public.

It is not known if any research has been conducted to determine what affect intense seismic airgun blasting could possibly have on munitions that have been in the ocean for

more than 50 years. Could seismic testing cause these munitions to “break apart and release their contents or detonate” potentially harming sea life including marine mammals? In the case of accidental detonation, the seismic vessels and their crew would be in danger.

The possibility of these negative outcomes is especially worrisome both because some munitions dump sites were in waters as shallow as 300 feet and because the exact locations of all sea-based munitions are probably unknown due to relocation by currents and unofficial disposal sites.

The recognition in the 2016 DoD report that disturbed sea-disposed munitions could threaten sea life lends itself to the conclusion that it would also be a threat to the public should chemicals reach land and injure beachgoers or others entering the ocean.

The commercial fishing industry and the public that consumes the product of this industry would also be threatened. Chemical contamination of waters could possibly harm or kill fish sought for commercial harvesting. Chemicals absorbed by fresh catch would eventually be consumed by the unsuspecting public.

Should these scenarios become a reality, there would be a significant economic impact on the commercial fishing and tourism industry of the affected coastal areas resulting in significant economic loss to all local businesses and local government both immediately as word spread and long-term as the reputation of the tourism area is tarnished.

The 2016 DoD report concludes that the best course of action regarding sea-based munitions disposal sites is to not disturb them because of their deteriorating state.

Thus, unless the federal government can demonstrate that it knows where all disposed munitions are in the Atlantic in order to require mitigation procedures so as not to disturb said munitions, no seismic airgun surveying permits should be issued for the Atlantic.

And unless the federal government has conducted tests on the possible impact seismic airgun blasting will have on these assuredly deteriorated munitions, no seismic permits should be issued for the Atlantic.

Sea-Based Radioactive Waste Disposal

Recently information has come to our attention regarding another, possibly more serious threat to the environment and local economies of the Atlantic Coast. Just as munitions were once thought to be safely disposed in the ocean, radioactive waste from the nation’s nuclear defense and energy programs in the 1940s and 1950s was deposited in the ocean.

In 2013, two newspapers reported on the extensive use of the United States coastal waters to dispose of its growing radioactive waste problem.

An in-depth report by the [Tampa Bay Times on December 30, 2013](#), including video interviews and old film footage from the National Archives and CriticalPast.com, tells the story of the USS Calhoun County and its sailors. This Navy vessel was charged in the 40s, 50s and early 60s with picking up 55-gallon drums of radioactive waste from various sites along the East Coast. Then the vessel would periodically go on scheduled 200 mile

runs to designated dump sites primarily off the coast of New Jersey where the sailors would roll 200 to 400 of the 500+ pound drums into the ocean. When the weather was bad, according to a first-hand account, the ship would unload its cargo much closer to shore. Some drums refused to sink, and rifle shots were used to puncture holes in the steel to send the radioactive waste under the surface.

The archived footage reveals that at least 12,000 drums of radioactive waste weighing in total over 5,700 tons were dumped in the ocean by the USS Calhoun County from February of 1958 through May of 1959 alone. Records of the radioactive waste dumps were not kept from 1946 to 1953.

On December 31, 2013, the [Wall Street Journal](#) gathered information from government documents revealing that the USS Calhoun County was not the only vessel charged with disposing radioactive waste in the nation's oceans. The Atomic Energy Commission also licensed private vessels to dispose of similar sized drums of radioactive waste to designated dump sites approximately 200 miles off the Atlantic, Pacific and Gulf coasts.

The official records show 23 disposal sites from Massachusetts to Florida. Four sites are off the South Carolina coast, two off the North Carolina coast and five off the Georgia coast.

There might be other documents providing more details about Navy and private vessels engaged in disposing radioactive waste in the ocean at other dump sites. However, based on the first-hand accounts of the sailors on the USS Calhoun County, there should be no doubt that private vessels, with no government records to keep, would have been more inclined than the Navy vessel to dump their cargo outside of the prescribed target areas.

The bottom line is that we can't be certain of where the possibly tens of thousands of these radioactive drums are now located in the ocean, both because many never made it to the target disposal sites and because of ocean currents.

Clearly, these drums of death, like the sea-disposed munitions, should not be disturbed for the same reasons of protecting the environment, sea life, beachgoers and others that enter the ocean and, of course, local coastal economies.

The recommendations are also the same. Unless the federal government can demonstrate that it knows where all the drums of radioactive waste are in the Atlantic in order to require mitigation procedures so as not to disturb said drums, no seismic testing permits should be issued for the Atlantic.

And unless the federal government has conducted tests on the possible impact seismic airgun blasting will have on these assuredly deteriorated drums and their content, no seismic permits should be issued for the Atlantic.

These toxic chemicals and radioactive materials are an undisputable threat to our Atlantic Coast marine life, commercial fishing, tourism, local economies and the public in general. Our coastal communities should not be put in jeopardy because the federal government refuses to identify the toxic dangers that lie just off our coast and how seismic testing will impact the deteriorated containers.

For this reason, our concerns raised in this submission, while outside the official comment period, should be admitted into the Administrative Record for both the decisions on the Atlantic seismic applications under the Outer Continental Shelf Lands Act and the National Environmental Protection Act analysis in support of the permitting decisions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Knapp Jr.", written in black ink.

Frank Knapp Jr.
President & CEO