



MEMORANDUM FOR SECRETARY OF VETERAN AFFAIRS (The Honorable Denis R. McDonough)

SUBJECT: Research Funding and Presumptive Service Connection for Intercontinental Ballistic Missile Community Veterans

1. OVERVIEW: The Torchlight Initiative is a private organization aimed at advocating for missile community members diagnosed with cancer and other serious illnesses. This Initiative was started in 2023 after several active-duty members and veterans were diagnosed with a variety of lymphomas in a short period of time. Today, our registry has over 320 identified missile community veterans with cancer (available at <https://torchlightinitiative.org/registry-summary/>). Roughly forty-four percent of these cancers come from veterans that served at Malmstrom AFB. The Torchlight Initiative requests that the Department of Veteran Affairs establish a working group related to the missile community toxic exposures to lead, volatile organic compounds, herbicides, pesticides, Polychlorinated Biphenyls (PCBs), and any other toxins identified at missile sites. We also respectfully request that a presumptive toxic exposure be created now for servicemembers that, “On or after 1 January 1967, performed active military, naval, air, or space service while assigned to a duty station at which intercontinental ballistic missiles (ICBMs) were present.” Veterans and their families should not continue to wait for critical medical care and support.

2. ISSUES: Military members in the missile community are suffering from abnormally high rates of many rare cancers. This phenomenon has been known since at least 2001 and has been inadequately studied. Many veterans and their families have been denied benefits or struggled to receive benefits because of not being able to demonstrate a service connection to their illness. This community was exposed to several known carcinogens, many of which were not removed from these facilities even after their discovery. The recently enacted Integrated Longitudinal Exposure Record (ILER) process is inadequate to protect missileers as the existing databases have not properly highlighted the environmental exposures known to have occurred. A streamlined VA process should be implemented to avoid the burdensome process of individually demonstrating exposure while serving in the missile community, with potentially disparate results depending on the reviewing official.

3. FACTS:

- a. Missile Alert Facilities (MAFs) were constructed in the 1960s. These facilities relied upon unfiltered well water to provide drinking water to the personnel, often with inadequate chlorination. These facilities were built using lead paint, PCBs, and asbestos. Crew members are on shift for 24 hours at a time, with shifts sometimes lasting up to 72 hours due to inclement weather. Missileers work in the Launch Control Center (LCC), which contain electronics known to have PCBs and that frequently leak suspected PCBs.

Below is a diagram that shows a typical MAF at Minot AFB, F.E. Warren AFB, and parts of Malmstrom AFB.

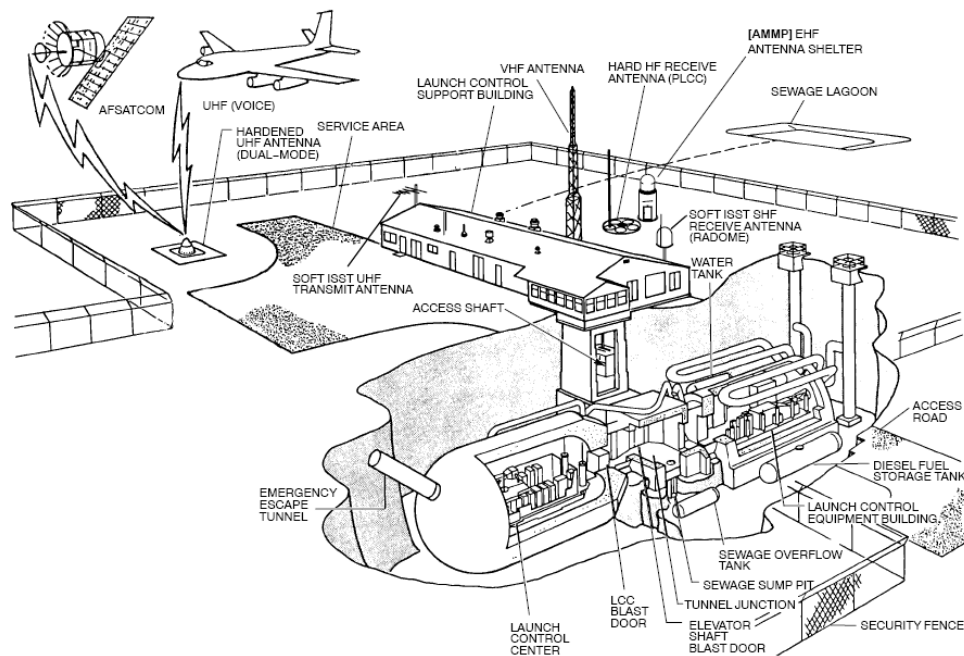


Figure 1: Illustration of a MAF and LCC Floorplan

- b. In 1994, the Government Accountability Office released a study on the DOD's management of PCBs. *Attachment 1*. The recommendation from that study was that "In view of the frequent lapses in identification, labeling, monitoring, storage, and disposal of PCB, and the instances where identified problems had not been corrected even years after the fact, the Secretary of Defense should direct the military services to fully comply with the Toxic Substances Control Act and EPA regulations by: (1) requiring all installations to identify and maintain inventories of major PCB items; and (2) implementing a follow-up program to ensure that deficiencies identified by EPA and other monitoring organizations are corrected." OSD and DOD established a policy claiming to have accomplished this by FY 1998.
- c. In 2000, the DOD conducted an environmental impact statement for demolition of the missile sites. That report noted that such a demolition would require the removal of PCBs from the sites prior to demolition. *Attachment 2*. "The LCC interior and walls of the LCSB were painted with lead-based paint. USTs and sub-surface concrete and steel at MAFs likely have a coating that contains PCBs. These coatings would be handled in accordance with federal and state requirements." *Attachment 2*.
- d. In 2001, the Air Force became aware of three servicemembers at Malmstrom AFB being diagnosed with lymphoma. *Attachment 3*. In response, the Air Force conducted an environmental study which noted the following potential toxic exposures: volatile organic compounds from diesel fuel, PCBs, toxins from burnt crypto tapes, biological exposure from standing water and sewage backup, pesticides, herbicides, chlorophenols,

carbon dioxide. The Air Force did not conduct testing for PCBs during this study. Water testing at the sites revealed several herbicides and pesticides of concern. Water testing occurred on one date at a limited number of MAFs. Under DOD policy, private water sources, such as these groundwater wells, were not continuously monitored for water quality.

- e. In 2003, the Air Force Space Command Surgeon General recommended providing notice of the cancer concerns and environmental hazards to the missileers. *Attachment 4*. This memorandum also suggested that the Air Force conduct an epidemiological study to look for possible associations related to toxic exposures. Neither of these occurred. Importantly, the 2001 cancer concerns happened before many of today's missileers with cancer pulled a single shift. Bottom line: 20 years of toxic exposures could have been avoided. Lives were lost and irreparable harm was caused because this recommendation was ignored.
- f. In 2005, in contrast to the previous position, the Air Force concluded that further epidemiological studies were not necessary. *Attachment 5*. This conclusion was made after two medical personnel obtained cursory data using only the Air Force's internal medical records. The Air Force medical community did not gather data related to former military members diagnosed in the civilian community. This same report also noted that many of the records they did attempt to retrieve were inaccurate or lost. For example, military members seeing off-base providers often did not have records of those visits. Importantly, this report also did not assess what the per capita diagnosis of various cancers were in the missile community in comparison to civilian populations. It also did not look at PCB leaks or test for PCBs in the facilities. This report also inaccurately claimed no known PCB exposures existed, in contrast to records demonstrating that maintenance and bioenvironmental teams were aware of their presence.
- g. In January 2023, a new cluster of former missileers were discovered that had been diagnosed with lymphomas and other rare cancers. *Attachment 6*. A new Missile Cancer Study was initiated by the Air Force in response. That study is still underway, but publicly acknowledged that PCBs were found in various parts of the MAFs at all three bases where humans would have had exposure to them. These PCBs had not been previously identified and tracked as required by the DOD's response to the PCB study in the 1990s. An official Air Force graphic from the study highlighting the locations of positive PCB swabs is on the next page for reference.

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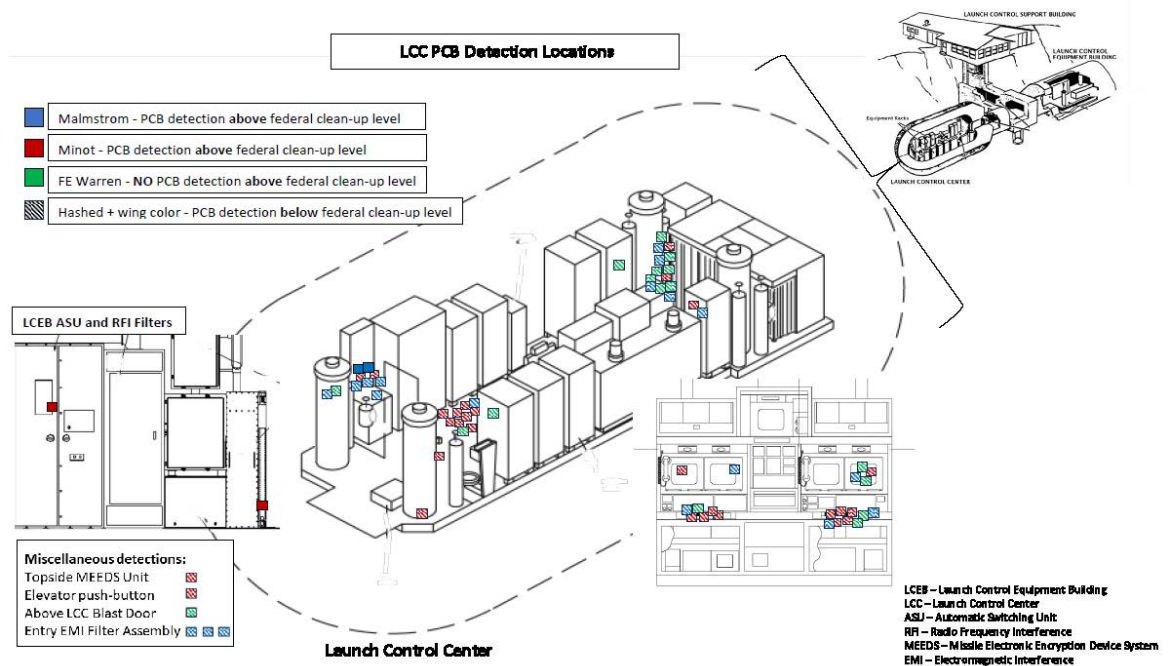


Figure 2: Air Force Missile Cancer Study Graphic of PCB Locations in LCCs

- h. In August 2023, the Air Force updated policy memos requiring for the first time that servicemembers are to evacuate a MAF suspected of a PCB leak instead of cleaning it up, as was previously done.
- i. In December 2023, an article in the Associated Press disclosed that records secured pursuant to the Freedom of Information Act showed known PCB leaks and exposure to asbestos in the MAFs. *Attachment 7*.
- j. PFAS, a toxic chemical in firefighting foam, has been discovered in ground water at both Malmstrom AFB and the Great Falls International Airport, which is home to an Air National Guard unit.
- k. The valley in which Malmstrom AFB sits is a popular agricultural area. This area has been the concern of the State of Montana regarding water contamination from petroleum plants, herbicides, and pesticides. *Attachment 8*. Several drinking water wells near the base and the MAFs were closed by the State of Montana in the late 1980s due to this contamination. Recently, the Air Force acknowledged that the water contamination needed to be addressed through new well sites and the installation of reverse osmosis systems at 8 MAFs. *Attachment 9*. Engineers tasked with this project noted the complex contamination and need to interview local farmers to avoid known areas of contamination.
- l. PCBs are highly toxic, known carcinogens. *Attachment 10*. PCBs in old electrical components can leak or become vaporized. These PCBs can then enter the bloodstream through your lungs and skin.

- m. The DOD and Department of the Air Force occupational health and safety regulations require continuous monitoring of toxic materials. For example, DAFMAN 48-146 requires blood monitoring and medical record monitoring for individuals with known exposures to lead, as was present in the MAFs. It is unclear whether or to what extent these monitoring or occupational health standards were followed.

4. AUTHORITY: The Honoring our PACT Act of 2022 created new authorities for the VA to provide health care and benefits to veterans exposed to toxic substances during their service. The Act also imposed obligations on the VA related to studying exposures. The relevant portions of this Act are listed below:

- a. Section 502: The VA must continually analyze all clinical data obtained in connection with its provision of hospital care, medical services, and nursing home care for toxic-exposed veterans that is likely to be scientifically useful in determining the association between a veteran's medical condition and a toxic exposure.
- b. Section 505: The VA must study the incidence of cancer in veterans to determine trends in the rates of incidence of cancer in veterans.
- c. Section 1171: The Secretary of the VA has the authority to establish additional presumptions of service connection based on toxic exposure.
- d. Section 1172: Allows for recommendations to be made to the Secretary for corrections needed related to the Individual Longitudinal Exposure Record (ILER).
- e. Section 203: Provides that the VA must conduct outreach to potential claimants after a presumptive connection is established.

5. REQUESTED ACTIONS:

- a. Create a presumptive toxic exposure for any servicemembers that performed duties at missile sites across the DOD.
- b. Conduct additional research to look at the prevalence of illness and the potential toxic substances at these sites.
- c. Fund federal research related to the monitoring and treatment of the missile community.
- d. Update ILER submissions to reflect known toxic exposures at missile sites.
- e. Ensure past denied claims are reviewed and notify future potential claimants of their toxic exposure.

6. CONCLUSION: Exposure to toxic substances happens within our own domestic military installations, as it does in foreign conflict zones. The missile community has a demonstrated number of toxic exposures with significant rates of illness. We must establish a presumptive service connection that acknowledges this community's sacrifices and removes burdensome red tape. Please direct all responses to thetorchlightinitiative@gmail.com. We respectfully request a formal determination be provided to us so that we may explore any administrative or legal remedies, as needed.

Respectfully Submitted,
The Torchlight Initiative

10 Attachments:

1. GAO Report: DOD Needs to Better Identify and Monitor Equipment Containing Polychlorinated Biphenyls (1994)
2. EIS for MAF Demolition (2000)
3. Exposure Assessment of Missile Crew Members in 564th Missile Squadron (2001)
4. MFR from Air Force Space Command Surgeon General (2003)
5. MFR from Bioenvironmental (2005)
6. AirForceTimes.com Article on Missile Cancer (2023), available at: <https://www.airforcetimes.com/news/your-air-force/2023/01/23/military-probing-whether-cancers-linked-to-nuclear-silo-work/bunkers.html>
7. AP Article, available at: <https://apnews.com/article/cancer-military-missile-nuclear-air-force-bd8455fb8c2d5828508ae214e493e537>
8. State of Montana Water Report (1989)
9. Engineering Firm Website Excerpt (Undated)
10. Center for Disease Control PCB Overview (2000)