

# **Wethersfield Airbase Contamination**

In-house Research guide



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## Summary

This guide provides links to a wide range of evidence to suggest there is a clear and present danger of contamination at the Wethersfield airbase. This conclusion is reached on the basis of a robust research approach that triangulates eyewitness testimony, written evidence from Wethersfield and similar sites, as well as an expert risk assessment. Despite this risk, the UK Government appears to be unwilling to conduct a thorough and transparent investigation.

### Section 1: Evidence from Wethersfield:

**Verbal testimony:** Residents local to Wethersfield Airfield have long heard stories about the burying or burning rubbish, about farmers and contractors burning oil or jet fuel that had run off the base into adjacent ponds and ditches. In addition, there are a number of first-hand accounts from contractors hired to prevent such leakages or simply empty 15,000 gallon oil bunds every three months for 20 years across the entire site. This testimony is corroborated by one witness who was the site's Safety, Health, Environmental & Fire Officer for 12 years and a firefighter for 20 years. During his work he observed during the hot summer months the ground would dry and crack and open up and waste became visible. He repeatedly asked for what appeared to be various burial locations across the site to be tested to ensure the safety across the base, but was repeatedly denied any action or answers.

**Written testimony:** Contemporary newspaper accounts of plane crashes and napalm explosions on or near the airfield, official letters to residents alerting them to bomb practice, a shooting range and firefighting practice all confirm activity on the site likely lead to possible contamination.

**Expert review:** Wethersfield Airbase Scrutiny Committee (WASC) commissioned a desk survey from Hugh Mallett, a Chartered Engineering Geologist at Buro Happold (BH)<sup>1</sup> In introducing his recommendations, Mallett wrote: **“The identified contamination sources represent potentially significant challenges to achieving safe development in particular areas but are capable of mitigation provided that the following actions / steps are taken by a potential developer.”**

His recommendations included detailed ground investigations to verify the presence of known and unknown contaminant sources and conditions. The report also recommends that the chemical analyses undertaken reflect the wide range of potential contaminants of concern, and “the Sampling and Analysis Plan must take account of the potential for all of these determinants to be present on the site either widespread or localised.” Given the wide range of potential risks at Wethersfield and the proven contamination at similar sites, relying on a desk survey to try to suggest that *contaminants are in isolated locations* would be insufficient.

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<sup>1</sup> Wethersfield Airfield Geoenvironmental Desk Study, Buro Happold, Nina Sopp, 18 April 2023, <https://www.thefieldsassociation.org/geo-environmental-information>

**Section 2: Evidence from other USAF sites outside the UK:** Around 700 domestic US military bases have been put on a list of contaminated sites due to chemical spillages during their military use<sup>2</sup>.

**Section 3: Evidence from other USAF sites in the UK** Although a similar legacy is likely at former United States Airforce (USAF) bases in the UK, very few records were kept of hazardous waste or how accidents were cleared up on overseas bases<sup>3</sup> and the US Government does not admit any responsibility for the clean-up of foreign sites that have been returned to the host country. With no systematic monitoring protocol in place, contamination is only found by chance. In 1997, for example, Radium-226 was found at RAF Carlisle<sup>4</sup>. The presence of so-called *Per- and polyfluorinated alkyl substances* (PFAs)<sup>5</sup> in drinking water at an ex-USAF base at Duxford<sup>6</sup>, not far from Wethersfield has caused concern because these long-lasting chemicals may cause harm to humans and wildlife.

#### **Section 4: Government responses in the USA and UK:**

**The UK Government's withholding of information:** The likelihood is that there were similar USAF activities and leakages at Wethersfield, and this suggests the potential for contaminants to be present. However, in its haste to build an Asylum Centre and / or two Mega Prisons on the Wethersfield site, the UK government seems to be attempting to by-pass safety and planning protocols by requesting that ground conditions and contamination be scoped out of the EIA process for considering development on the site<sup>7</sup>.

Local residents are concerned by this but their requests for information have been deflected.

**The US Government's Superfund:** In contrast, the US government created Superfund in 1980, a government programme that identifies and cleans up the worst contaminated sites in the US and territories. Many US military bases have been added to the Superfund list<sup>8</sup>. There are also a number of organisations helping any veterans who may have been affected.

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<sup>2</sup> Military Bases that Housed Toxic Materials, Contaminated Water, and PFAs, Veteran's View, accessed 22 May 2023

<https://veteransview.com/news/military-bases-that-housed-toxic-materials-contaminated-water-and-pfas>

<sup>3</sup> Overseas Military Bases and Environment, Institute for Policy Studies, John Lindsay-Poland & Nick Morgan, June 1998, [https://ips-dc.org/overseas\\_military\\_bases\\_and\\_environment/](https://ips-dc.org/overseas_military_bases_and_environment/), last accessed 4 May, 2023

<sup>4</sup> Dial R for Radioactive, New Scientist, Rob Edwards, 12 July 1997 <https://www.newscientist.com/article/mg15520902-900-dial-r-for-radioactive/>

<sup>5</sup> United States Environmental Protection Agency <https://comptox.epa.gov/dashboard/chemical-lists/pfasmaster> accessed 2nd May 2023

<sup>6</sup> Cambridge Water Errors Led to Toxic Water Report Says, BBC Cambridgeshire, 20 April 2022

<https://www.bbc.com/news/uk-england-cambridgeshire-65326874>

<sup>7</sup> Scoping Opinion Report, Charlotte Tucker, November 2021

<https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/6203c56c71170a519d2ebcd6/1644414317718/Scoping+report.pdf>

<sup>8</sup> Search for Superfund Sites Where You Live, United States Environmental Protection Agency, <https://www.epa.gov/superfund/search-superfund-sites-where-you-live> accessed 22 May 2023

## Objective

The aim of this guide is to support the conclusions and recommendations in the Buro Happold (BH) report through further research on contamination on military bases built and/or maintained by the United States both overseas and domestic. In so doing, it seeks to demonstrate the high probability that RAF Wethersfield holds similar contamination issues.

The guide is not intended as a report or set of recommendations, but as a collection of weblinks to articles found in the public domain, with quotes from those articles and notes on each section for further reading.

This is an in-house (The Fields Association / WASC) research guide document and suggested edits are welcomed so that the guide can be updated.

## Background

Today the USA has around 750 bases in 80 countries but it maintained over twice that number during the 1940s when the USAAF leased or built more than 200 airfields in the UK<sup>9,10,11</sup> mostly in the Southeast due to the flat countryside and proximity to Europe.

Wethersfield Airbase began as an RAF base in 1941 and was leased to the USAF in from 1943 until 1990. Most of the construction occurred during WWII and was upgraded in 1952 in response to the nuclear threat. During the 1990s there remained around 100 bases in the UK run by the United States, and today only 13 remain<sup>12</sup> Many bases have since been decommissioned or returned to local control. Whilst under their control, jurisdiction for all base activities on bases was with the American military. When the leases expired, responsibility transferred back to the MoD, including for any mitigation. Because of poor US record keeping, the MoD often has no idea of the extent, if any, of contamination on the bases.

The US military operates within the UK through the Visiting Forces Act 1952 but due to the development of new technologies, this legislation is outdated and more control over what happens on these bases may be required by the host country, such as how hazardous materials are handled.

According to the Campaign for Nuclear Disarmament (CND) website:

“Whilst most of these bases are named Royal Air Force (RAF) stations, usually they are leased by the US for the purpose of US Air Force (USAF) operations. As such, whilst the physical buildings comprising the bases are usually the property of the Ministry of Defence (MoD), very little of what happens in them is controlled by the British government”.

“Largely, this is because the primary framework which legislates for these bases - the Status of Forces Agreement and Visiting Forces Act - ultimately reserves jurisdiction of US personnel to the US. Furthermore, as this legislation was created prior to the development of several of the technologies these bases use, such as intelligence gathering and surveillance technologies, the legislation outlining permitted activities is outdated. This severely limits the UK’s legislative control of the numerous activities which employ these technologies.”<sup>13</sup>

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<sup>9</sup> How Many US Military Bases are There in the World? The Soldier’s Project, Everett Bledsoe 2 May 2023 <https://www.thesoldiersproject.org/how-many-us-military-bases-are-there-in-the-world/>

<sup>10</sup> The United States Probably has More Foreign Military Bases Than Any Other People, Nation or Empire in History, The Nation, David Vine, 14 September 2015 <https://www.thenation.com/article/world/the-united-states-probably-has-more-foreign-military-bases-than-any-other-people-nation-or-empire-in-history/>

<sup>11</sup> American Airmen in Britain During the Second World War, Imperial War Museum, <https://www.iwm.org.uk/history/american-airmen-in-britain-during-the-second-world-war> accessed 22 May 2023

<sup>12</sup> US Bases in the UK and UK Bases Overseas - What They Are and What They Do, Campaign for Nuclear Disarmament <https://cnduk.org/resources/military-bases-us-bases-in-the-uk-and-uk-bases-overseas-what-they-are-and-what-they-do/> accessed 22 May 2023

<sup>13</sup> *ibid*

## 1. Evidence from Wethersfield

Evidence from other USAF bases, alongside the many stories from local residents who worked on or lived near the Wethersfield Airbase, as well as stories from men who served there, means that it is reasonable to assume there also may be contamination on Wethersfield Airbase.

The BH report states that “due to the history of military use, there is a significant potential for the presence of further unknown and undocumented sources of contamination which may not have been recorded on any existing documents and which could be present at almost any location across this very large site.”

The map in the BH report shows many areas that may reveal contamination, if ground and water are tested on those sites. This map should be used as a starting point. Evidence at other sites has shown how contamination can be spread around the area and beyond the base perimeter.

The BH report establishes in 4.1.1 the “main ancillary facilities were in the southwest, and included various stores and workshops (pyrotechnic stores, lubricants and inflammables stores, aircraft maintenance / decontamination etc), bulk fuel installation, as well as administrative buildings.” This area is known as the Technical Site, which includes all the office and accommodation blocks, and the gym and social areas. The houses are separate and referred to as The Family Quarters. The Technical Site and the Family Quarters are of concern to us because of the development of the site as outlined in 4.1.1.

The BH report also describes a considerable amount of construction and upgrading to the site: “In 1951 the UK provided RAF Wethersfield to the USAF, with work to upgrade the facilities also commencing that year. In the summer of 1952, RAF Wethersfield was reactivated and became home of the 20th Fighter Bomber Wing. The USAF constructed numerous new buildings, including new accommodation blocks and social and administrative buildings. An on-site chapel, St Michael’s Chapel, was also built at the same time.”

Although the areas known as the Technical Site and The Family Quarters on Wethersfield Airbase have always had buildings on them since the base was constructed, the evidence from RAF Carlisle and at Treasure Island shows contaminated ground may have been used for landscaping and other building material and the upgrading and construction of many new buildings at RAF Wethersfield in 1951 may have followed the same methods of other sites.

Farmers local to Wethersfield Airfield have described problems with ponds and water in ditches, resorting to setting them alight to get rid of oil in them.

## 2. Evidence from USAF bases in the UK

In a 1997 New Scientist article ‘As many as 50 military bases and numerous civilian sites in Britain could have been contaminated with radioactive waste.’

A regular waste disposal method was burning, including airplane parts such as luminous dials. The 1997 article in the New Scientist says that radium-226 was discovered by accident in RAF Carlisle. “Investigations revealed that during the 1940s and 1950s, RAF Carlisle incinerated thousands of luminous dials from old planes in accordance with the “bash, bury or burn” disposal policy of the time. The radioactive ash from the incinerators was used to landscape the site... Brown says the ash was also used to pack fence posts into holes around the site boundary.”

<https://www.newscientist.com/article/mg15520902-900-dial-r-for-radioactive/>

USAF Upper Heyford near Bicester had major mitigation issues for a housing developer. While many known contamination sites have been discovered by accident or illness, some, like this site, were discovered through soil tests. **This appears to be a key precedent.**

<https://www.oxfordmail.co.uk/news/18645375.contaminated-soil-found-heyford-park-housing-site-near-bicester/>

A 2012 Guardian reported wrote: “Hundreds of sites across England and Wales could be contaminated with radioactive waste from old military bases and factories, according to a new government report.”

The paper also said, “Up to 1,000 sites could be polluted, though the best guess is that between 150 and 250 are, says a report on contaminated land by the Department of Energy and Climate Change (DECC), released last month, but previously unreported.”

<https://www.theguardian.com/environment/2012/may/02/radioactive-waste-contaminating-uk-sites>

The COMARE report on Dalgety Bay is mentioned in this Guardian article:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/312674/COMARE\\_15th\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312674/COMARE_15th_Report.pdf)

<https://www.theguardian.com/environment/2014/may/14/mod-nuclear-waste-contamination-report-dalgety-bay>

See the first page for who COMARE are and what they do. Although not a comparable site in geography, there are interesting takeaways from this, in particular that



**identifying the presence of even a small amount of radium-226 will cause a big headache for anyone who wants to do anything with the site**, and that the MoD do not have records of all the bases that might have burned luminescent dials, but they do accept it was very widespread.

For a quick introductory skim, go to page 15 on Radium, page 19 (pt 4.8) and page 54 implications for other sites.

Also see this Guardian article as a note on how MoD received this information initially: <https://www.theguardian.com/environment/2014/may/14/mod-nuclear-waste-contamination-report-dalgety-bay> And this opening paragraph: "The MoD has been forced to abandon attempts to block a report by government advisers warning that radioactive contamination of military sites across the UK could pose a risk to public health."

From the same article in the Guardian: 'COMARE is demanding authority from the government to force the MoD to draw up a full list of potentially contaminated sites. "The information available for each site should be evaluated and, where deemed necessary, investigation and/or remediation instituted," it says.'

After Dalgety Bay the Guardian used FOIs to find 15 other sites with radium-226. "A dozen of the sites, which include current and former air & naval bases, have not been identified before by the MoD. Some are accessible to the public or are being developed for homes or businesses, though the potential risks are unclear."

"But the MoD has so far been reluctant to make any commitment, partly because of the precedent it might set, experts say. Now it has revealed that there are a minimum of 12 previously unknown sites suffering "localised radium contaminated soil" due to "historical activities".

<https://www.theguardian.com/environment/2011/dec/20/mod-radioactive-world-war-two>

An article from The Herald begins with: "The MoD has been accused of handling the situation so badly that it missed more than 400 radioactive hotspots, including some of the most lethal ever found on public beaches."

"Because of the MoD's failure to properly assess the extent and risks from the contamination, any further surveys or assessments should not be carried out by the MoD, or MoD contractors," said Fred Dawson, who worked for the MoD for 31 years before he left as head of the radiation protection policy team in 2009."

<https://www.heraldscotland.com/news/13041249.mod-fire-atomic-beach/>

### 3. Evidence from USAF bases outside the UK

Many American-run bases around the world have been found to have radiation and/or chemical contamination. Nearly 700 US domestic bases have been confirmed contaminated by PFAS. See these links for map and further information:

<https://www.ewg.org/news-insights/news/updated-map-suspected-and-confirmed-pfas-pollution-us-military-bases>

<https://www.militarytimes.com/news/your-military/2020/04/06/heres-the-latest-count-of-suspected-bases-with-toxic-forever-chemicals-in-the-water/>

The US Navy had decommissioned the base on Treasure Island near San Francisco and was in the process of turning the houses over to civilian control when they discovered radiation across the site: “We found radiation, contaminated materials, in playgrounds and in areas that had previously been playgrounds,” said McLean, 52, who lives in North Carolina. “We found it in front yards. We found it underneath sidewalks and along the roadways.” “McLean indicated that he was concerned regarding the fact that they are finding radium sources ... at many locations on the west side of Treasure Island.” Prendergast wrote in an internal email dated June 25, 2008. McLean “was concerned that the sources could represent a hazard to children or something the bad guys could use to make a dirty bomb.”

See the full article here: <https://thebulletin.org/2014/02/treasure-island-cleanup-exposes-navys-mishandling-of-its-nuclear-past/>

The water tables around Camp Lejeune in North Carolina were contaminated with trichloroethylene and perchloroethylene. These chemicals are considered volatile organic compounds and are most often used as dry-cleaning solvents and degreasers.

For more on Camp Lejeune: <https://veteransguide.org/toxic-exposure/camp-lejeune/>

According to the US Department of Veterans Affairs, “Many service members use industrial solvents in regular military tasks such as cleaning, degreasing, paint stripping, and thinning oil-based paints. Too much exposure to some industrial solvents can cause short-term and long-term health effects.” These include: Benzene, Acetone, Tetrachloroethylene, Trichloroethylene, and Xylenes.

See: <https://www.publichealth.va.gov/exposures/solvents/index.asp>

This is consistent with reports from other bases around the world including farms near 95 bases in the United States, see: <https://www.ewg.org/news->

[insights/news/2021/10/forever-chemicals-military-bases-may-be-lurking-agricultural-water](https://www.civilianexposure.org/pfas-contamination-at-u-s-airbases-in-germany/)

Reports include that water 11 km downstream from Ramstein has been contaminated. In this article from Civilian Exposure, “The concentration of PFAS in the Glan River, below the confluence of the Mohrbach River, 11 kilometers from Ramstein, was 538 times the level the EU says is safe.” See: <https://www.civilianexposure.org/pfas-contamination-at-u-s-airbases-in-germany/>

In the earlier years of operation on these bases we did not know the extent of damage contaminants might cause, or how far beyond the base disposal methods might travel.

“In disposing of its wastes, the Defense Department both in the United States and overseas has followed what it calls “the commonly accepted practices of the times.” Those practices included, according to Pentagon documents, “discharge on the ground into unlined pits . . . or local creeks,” “pouring and spraying on the ground,” “drainage to industrial sewers,” “burning during fire protection training” and “storage in leaking underground tanks.”

See: <https://www.latimes.com/archives/la-xpm-1990-06-18-mn-96-story.html>

Key points from an article from the Institute for Policy Studies:

- The U.S. lacks a comprehensive program for responding to environmental contamination at foreign military bases.
- Operating without clear legal obligations, the Pentagon has chosen to implement the most minimal environmental program possible.
- Shrouded in secrecy, DOD has avoided oversight and criticism of its existing programs, which are administered by well-intentioned staff in a haphazard, inconsistent, and underfunded manner.”

Key quotes:

“Most overseas military base agreements were signed prior to the current era of environmental awareness and, accordingly, contain extremely vague environmental provisions, if any. Before the 1980s, the military kept few records of the exact amounts or locations where toxics and explosives were used. That is why, even at domestic bases, extensive study is often needed to discover and characterize hazards.”

“When environmental staff do conduct cleanups, it is often without input from host governments and always without consulting affected communities. Rather than building trust, as it has attempted domestically over the last few years, the Pentagon has avoided all public discussion overseas. DOD’s isolation from the overseas public and from some host governments invites political controversy whenever major sites

are discovered. Members of the public, legislators & agency representatives in Iceland, Germany, Italy, Okinawa, Panama, the Philippines & Puerto Rico have expressed frustration with DOD's cleanup program. Anger over environmental impacts undermines constructive relations w/ foreign countries both large & small."

For the full article: [https://ips-dc.org/overseas\\_military\\_bases\\_and\\_environment/](https://ips-dc.org/overseas_military_bases_and_environment/)

#### Iceland:

"At Heiðarfjall, trash and hazardous waste can be found in the soil from the time when there was a checkpoint, run by the United States on behalf of the NATO defense system, from 1954 to 1970."

More on Iceland and US bases: <https://grapevine.is/news/2021/05/12/us-military-trash-is-still-not-cleaned-up-after-50-years/>

#### Germany, Guam and the Philippines:

In this Los Angeles Times article from 1990: "The United States' far-flung network of overseas military bases, operating in secret and far outside the reach of American environmental regulation, has left a quagmire of chemical contamination all around the globe that will cost billions of dollars to correct and will damage American foreign policy interests for years to come."

"As a result of past negligence at overseas installations, negotiations with foreign governments over environmental damages will be tense, expensive and perhaps ultimately damaging to U.S. interests abroad, senior military and civilian government officials said."

"While there is no systematic effort under way to determine how badly polluted America's overseas bases are, the Army--without even looking formally--has identified 300 contaminated sites in West Germany alone. Of the total, 30 are on bases slated for closure and 25 are currently deemed serious enough to require expensive long-term remedies."

Full article: <https://www.latimes.com/archives/la-xpm-1990-06-18-mn-96-story.html>

#### Okinawa:

Contamination can result from accidents, not just poor storage, or disposal. This article outlines numerous accidents on US bases in Okinawa that resulted in contamination. These incidents involved jet fuel and diesel, antifreeze, and mixed water/POL (Petroleum, Oils and Lubricants).

“Since 2002, at least 270 environmental accidents on US Marine Corps bases in Okinawa have contaminated land and local waterways but, until now, almost none of these incidents have been made public.”

More on the extensive contamination issues in or near US military bases in Okinawa: <https://www.civilianexposure.org/environmental-contamination-at-us-marine-corps-bases-on-okinawa/>

In the article, Environmental Contamination at USMC bases on Okinawa, Jon Mitchell reports: “In the early 1980s, the USMC discovered elevated chemical readings in storm water flowing from the base. When maintenance crews investigated, they discovered more than 100 barrels of unknown chemicals, some painted with the tell-tale orange stripes of U.S. military defoliants. Following the discovery, senior officers ordered the clandestine removal of the barrels for disposal elsewhere.”

For the full article: <https://apjff.org/2017/04/Mitchell.html>

#### US Territories in the Pacific:

British journalist Jon Mitchell has written two books on military contamination, including *Poisoning the Pacific* about US military contamination in the Pacific, and for an article about the same: <https://www.theguardian.com/world/2020/oct/11/poisoning-the-pacific-new-book-details-us-military-contamination-of-islands-and-ocean>

“Caught in a geopolitical grey zone, US territories have been among the worst affected by military contamination, including Guam, Saipan, and Johnston Island, the final disposal site of apocalyptic volumes of chemical weapons and Agent Orange.” <https://rowman.com/ISBN/9781538130339/Poisoning-the-Pacific-The-US-Military#>

#### South Korea:

“South Korea’s environmental ministry has previously said hazardous substances, including benzene, arsenic, and lead, were found in the soil and water on bases.

Officials in Seoul also inspectors found oil pollution and heavy metal contamination on 11 out of the 12 bases that were returned Friday, according to Hankook Ilbo.

South Korean advocacy groups say the cleanup of the 12 bases would cost about \$275 million. Government sources said the U.S. military would look into cost sharing only after South Korea covers the initial costs, the report says.”

[https://www.upi.com/Top\\_News/World-News/2020/12/11/South-Korea-accepts-12-former-US-military-bases/8101607708380/](https://www.upi.com/Top_News/World-News/2020/12/11/South-Korea-accepts-12-former-US-military-bases/8101607708380/)

## 4. Government responses

### 4.1 UK opacity

The likelihood of similar USAF activities and leakages at Wethersfield suggests the potential for PFAs and other contaminants to be present. A wildlife pond recently excavated near the Southwest perimeter of the Wethersfield Airbase filled with milky blue water, completely different to the normal clear-brown water of a nearby pond, a quarter of a mile from the base.

The UK government seems to be attempting to by-pass safety and planning protocols as they press forward to build two Mega Prisons and one of the largest Asylum Centres to date in the country on the base. And when questioned through Freedom of Information requests, they answer with deflection and heavily redacted documents.

The Ministry of Justice's (MoJ) planning consultants, Cushman and Wakefield, in a written submission to Braintree District Council (BDC) claimed that an initial geo-environmental appraisal identified **no risks of contamination or hazardous gas** and, **"it is therefore considered that ground conditions and contamination can be scoped out of the EIA process"**<sup>14</sup>.

In response, members of The Fields Association sent Freedom of Information requests (FOIs) to the Ministry of Justice (MoJ) to request any existing soil and water tests and surveys of the site. Although the MoJ admitted it did have this information, it claimed in its replies it is exempt from disclosure because disclosure might affect the MoD's negotiating position commercially<sup>15</sup>, and in another FOI reply, because the information "might adversely affect relations with our allies"<sup>16</sup>.

Residents' FOIs also revealed two reports, a Defence Infrastructure Organisation (DIO) report in 2021<sup>17</sup>, and a report commissioned by Homes England July 2018 Carried out by Tibbalds CambellReith. Both reports are heavily redacted, and both the DIO and Homes England completely redact the sections on Ground Conditions<sup>18</sup>. Redacting the Ground Conditions in these reports because disclosure could influence commercial negotiations and/or affect relations with their allies when other government departments claim there are no risks of contamination therefore ground conditions and contamination should be scoped out of the EIA process is an unresolved mismatch that has caused great concern for local residents.

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<sup>14</sup> Scoping Opinion Report, Charlotte Tucker, November 2021

<https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/6203c56c71170a519d2ebcd6/1644414317718/Scoping+report.pdf>

<sup>15</sup> MoJ Surveys FOI request response

<https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/64136fe3af579164bea62e3d/1678995428108/MOJ+FOI+reply+211122.pdf>

<sup>16</sup> MoD Preliminary Studies for Development request, DIO Response to FOI request 2022/07594 18 August 2022,

<https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/64623e875ba9013aca97adbf/1684160136183/FOI+MoD.pdf>

<sup>17</sup> DIO MDP Wethersfield, Braintree CM7 4AZ Stage 1 Report from June 2021, Montague Evans.

[https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/632305b58a59002fd9f7c743/1663239621425/20220817-Annex+A\\_F%5B18095%5D.pdf](https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/632305b58a59002fd9f7c743/1663239621425/20220817-Annex+A_F%5B18095%5D.pdf)

<sup>18</sup> MDPGA Stage 1 Report commissioned by Homes England July 2018 Carried out by Tibbalds CambellReith,

<https://static1.squarespace.com/static/61d89f42895b8835d83c2663/t/646b9483a423bc35140ef43a/1684771983000/230519-RF14264-Response+%26+Annex+A.pdf>

## 4.2 USA Superfund

Superfund is the American government program that identifies and cleans up the worst hazardous substance sites in the United States and territories. The National Priorities List are locations that have been put forward to be on a Superfund list, are currently on Superfund or have been deleted from Superfund when the Environmental Protection Agency (EPA) has determined no further response is required to protect human health.

Many current and former military bases are listed as Superfund sites. See more here about Superfund: <https://www.epa.gov/superfund/what-superfund>

An article in Nature investigates if living near Superfund sites (areas of contamination) influences life expectancy. ‘The Presence of Superfund Sites as a determinant of life expectancy in the United States’, Amin Kiaghadi, Hanadi S. Rifai & Clint N. Dawson, 13 April 2021 See: <https://www.nature.com/articles/s41467-021-22249-2>

Quotes from the abstract: “Superfund sites could affect life expectancy (LE) via increasing the likelihood of exposure to toxic chemicals... Specific characteristics of Superfund sites such as being prone to flooding and the absence of a cleanup strategy could amplify the adverse effect. Furthermore, the presence of Superfund sites amplifies the negative influence of sociodemographic factors at lower LEs.”

According to the law firm Chisholm Chisholm & Kilpatrick Ltd, writing on their website about military bases on the Superfund list: “Some of the harmful substances found on military bases include tetrachloroethane, arsenic, benzene, cyanide, and lead. EPA’s website shows the contaminants found at each site and what was contaminated, such as the groundwater, soil, or sediment.” See: <https://cck-law.com/blog/superfund-sites-and-how-they-impact-veterans/>

**That many military bases are listed as Superfund sites shows an official recognition of the level of contamination on these bases. That no bases outside the United States and territories are on the list is more about jurisdiction than denial of responsibility or lack of contamination overseas.**

To see the action to support veterans who have had exposure to PFAS see here: <https://veteransguide.org/toxic-exposure/pfas/> And more information on the US military and PFAS here: <https://www.gao.gov/assets/gao-21-421.pdf>

## Conclusions

Contemporary newspaper reports and witnesses to activities that would result in ground or water contamination show RAF Wethersfield carried out similar activities to other bases where contaminants have been confirmed through ground investigations and surveys.

Because the US military did not keep good records of disposal of contaminants on their bases either at home or overseas, the most reliable source of information for levels and locations of contaminants at Wethersfield Airbase will be a complete survey of the site, including the Technical and Accommodation Areas.

There is enough consistent information about Wethersfield Airfield and other USAF bases around the UK and world to confirm the chances of there being no contamination is zero. Before construction workers, residents or visitors arrive onsite a ground investigation and survey should be completed and results made available to the public. This is a public health obligation.