

Statistics for Action Hazardous Waste Cleanup Guide: Containing the Danger

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Acknowledgments

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Statistics for Action Hazardous Waste **Cleanup Guide: Containing the Danger**

Introduction to this Guide

WHAT'S HERE

This guide focuses on the input citizens can give before and during a hazardous waste cleanup. We offer suggestions and activities to deepen your understanding. Use the guide to learn:

- 1) What components make for a good cleanup plan.
- 2) What testing will happen as part of the process.
- 3) How to handle the results—how to decode lab results and consultants' reports that are full of unfamiliar terms.
- 4) How to communicate results to neighbors and decision-makers without losing your audience.

If the nature and extent of suspected contamination still need to be proven, refer to the SfA Soil Quality Guide: Digging Into the Dirt and the SfA Water Quality Guide: Read Before You Drink available at http://sfa.terc.edu.

Smart Moves can help you take control of the math. When there is too much data for your mind to absorb: Slow down. Compare it-Connect to what you already know. Talk it out. Make sense of it for yourself, then seek verification.



Going Solo?

This guide tells the stories of community groups giving input or monitoring cleanups of contamination from industries located in their neighborhoods. Following the stories and examining the data will give you ideas for how to tackle the test results you receive.

Got a Group?

Statistics for Action has activity ideas and resources for groups to use. These are meant to make it easier to understand the data from reports. The goal is for everyone in the group to feel more confident reviewing and talking about test results.

Activities marked with the SfA icon are on the SfA website: sfa.terc.edu/materials/activities.html

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Try the activities to deepen understanding and help with planning.



INTRODUCTION: WHY DOES IT TAKE SO LONG?

Deciding on a cleanup plan can take years. The parties involved have to agree on:

- Who is responsible;
- Who will pay;
- How extensive the cleanup will be.

The government has not set legal limits for every chemical in use. If there are no standards in place, it will take time to research and arrive at and agree on acceptable levels.

The current and past owners of the site, the community, and regulators at the county, state, or federal level will have their own ways of looking at the problem, including liability, safety, and legality. Once the cleanup gets started, testing will happen on a regular basis. Lab results from water samples taken from monitoring wells and soil samples taken from certain locations will allow you and others to track the concentration of the contaminants present. Consultants hired to do the cleanup will report against remediation objectives for each contaminant.

What can go wrong? Machinery goes off line, the owner or contractor runs out of money, a new plume is detected and more samples are needed.

Every site cleanup plan/proposal should include a map with the locations marked where monitoring wells, soil, and sediment samples will be taken.



Prior to any cleanup, environmental tests should establish the extent of contamination. The cleanup plan should include not only the site where the problem started but also any backyards, streams, ponds, fields, state-owned, city, schools or property that have been contaminated.



TERMS YOU MAY RUN ACROSS

Background Level

The level of a contaminant that either occurs naturally, or is spread evenly across a large geographic area. If you want to know if contamination levels are unusually high, compare them to background levels, not zero.

Concentration

The strength of a chemical in a liquid. For example, the amount of flouride in a liter of water.

Contaminant

Chemical solvents, metals, and neurotoxins that can make water unsafe for humans and animals exposed to it.

Detection limit

The limits of a given scale. When a bathroom scale tops out, it can't distinguish between the weight of two men and ten men (if they could all fit). Similarly, the amount of a contaminant is sometimes too small to be detected with the lab's equipment.

Feasibility

How easy it is to do something. A cleanup plan might not be feasible if it would be very expensive, or take many years, or require many people moving away.

ND

Not detected. Reports state "ND" when the amount of a contaminant is too small to be measured with the lab test used.

NT

Not tested.

NS/NL

No Standard / No Level has been defined for this contaminant.

Ppb

Parts per billion; another way to express micrograms per kilogram. Micrograms are 1,000 times smaller than a milligram and kilograms are 1,000,000 times larger, so a microgram is a billion times smaller than a kilogram.

Ppm

Parts per million; another way to express milligrams per liter or milligrams per kilogram.

Plume

Pollution that is spreading from a spill or release.

Preventative Action Limit

A contamination level that is safe, but is high enough so that action needs to be taken to prevent it from going higher. Usually it is half or a tenth of a legal limit.

Regulators

Government employees who enforce environmental laws, and make decisions about cleanups.

Remediation

Cleaning up damage done to the environment.

Remediation Objective

The goal of a cleanup. This might be to get contamination down below a certain level.

Reporting Limit

The lowest weight at which an instrument is accurate.

Risk Assessment

A long process in which scientists find out where the contamination is, how much of it there is, and how and when people might come into contact with the contamination. All these factors affect risk to people's health.

Sample

A small part of something that may tell you about something larger. If you take a soil sample from a field and find contamination in the sample, you may find contamination in other places in the field, too.

Got a Group? 🤥

Use fact sheets from *Common Units* and *Limits* and *Levels* to get a better grasp of these units.

We educated ourselves. We had definitions for everyone. Every technical term we came across, we shared and defined. – Kim Wasserman-Nieto, LVEJO





Consultants will present charts from lab results for chemicals over the Preventitive Action Limit (PAL). Read the chart to learn how high contaminant levels were on testing days.



Often, making your own graph will help you see a trend.





EXPRESSING CONCERNS: Two Stories

The wastewater lagoons on Charbert Dye Company's land in Alton, Rhode Island, were the size of football fields. They gave off fumes that caused headaches, nausea, and breathing problems.

Neighbors of Charbert Dye Company formed a group called Alton Community Action. Testing drinking water wells was a priority. Once high levels of TCE were found, the Department of Public Health recommended that Charbert's neighbors stop using well water for drinking, cooking, or bathing infants.

Working with the state to get Charbert Dye Company to clean up its operations was a slow process. Then Charbert shut down operations in and hired GZA Environmental to conduct a cleanup. GZA submits quarterly reports, but it will take years to bring down the contaminant levels. ACA members suspect Charbert will sell the land and wonder who will buy it and for what purpose. Meanwhile, some people are asking for a safe source of tap water.

Talk to others

Invite neighbors and others in the community to meetings where you share ideas for how the site could be used in the future. Form a group. Then explain to decisionmakers how the community wants to use the site in the future. The site's future use will determine the methods and remediation objectives. In any case, the cleanup should:

- ✓ Remove or contain contaminants
- ✓ Protect human and ecological health from future harm
- ✓ Prevent human contact with contaminated air, soil, and water

Clarify that the cleanup is NOT likely to:

- × Restore the land or water to pristine conditions
- × Reverse health effects
- × Provide money for treating people with health problems associated with the contamination.

Used as a park, a soccer field, an out-of-the-way place to fix a truck, the 24-acre site in Chicago was once an asphalt plant that left massive amounts of contamination in

the soil.

Kim and others know the neighborhood needs more parks, but locating one on such a contaminated site raised many issues.



"Getting the testing and cleanup underway was a very difficult, emotional time. People were fighting for their homes. They were fighting for their lives. To figure out which houses would get remediation and which wouldn't, the EPA wanted to use test results from 10 years ago. Unfortunately, the EPA was not able to hear what folks were asking for: dignity, their rights, justice." Little Village Environmental Justice staff remember that they had to go around the EPA. "What we were asking for wasn't being done."

We were able to fight for a couple things. We held the meetings in the neighborhood in English and Spanish. No one had to go downtown. We educated ourselves. We had definitions for everyone.

-Kim Wasserman-Nieto, LVEJO

Community Member Checklist
Reach agreement with other community members on your priorities for the cleanup.
Create pressure for ensuring safety for people who live near the site before and during the cleanup.
Learn about remediation methods for the contaminants present on the site.
Watch for conflicts of interest whenenvironmental professionals are hired.
Agree on a vision for the future use of the land.



Reviewing Cleanup Options

There are generally three routes a clean-up can take:

- 1. Physically remove contaminated water or soil from the site and transport it to a hazardous waste facility.
- 2. Treat the contamination on site. For example, by injecting chemicals into the soil or groundwater to break down the contaminants into harmless compounds. Or by pumping water or air through the soil to flush out the contamination.
- 3. Cover the contamination to contain and prevent exposure.

In each case, the cleanup plan will include a monitoring plan to make sure contamination is being contained.

Regulators have the job of approving a cleanup plan. The owner or consultant presents a few options. The regulators then compare the plans using criteria like:

- Effectiveness and likelihood of success
- Short- and long-term reliability
- Difficulty in implementation
- Cost
- Risk of spreading contamination
- Benefits

Community Member Checklist

Find out if contaminated soil or sediment will stay in place. Assess the risk to trucking through the neighborhood: to where?

Evaluate the costs and the trade-offs. A longer cleanup may be more comprehensive and decrease health risks long-term.

Review the assumptions about who will be at risk. Take everyone into account, even undocumented families who live or work nearby but might not come to meetings.



Formulate questions and a recommendation

List specific questions. Do the research and make the contacts to get the answers that will help your group make a recommendation.

Based on the information you have, formulate your recommendation for the best cleanup option.

In Chicago, the residents of the Little Village neighborhood met and decided that they wanted the contaminated site capped. The community said:

Where are they going to put that soil? Are we going to follow every truck that leaves the site? How are we going to know that the dump or landfill or wherever they're going isn't going to leach out to another community? We prefer to know that it's in the ground and that it's not going anywhere and that it's not going to affect anyone else.

Questions for an independent expert:

- ✓ Does starting with this approach make it harder or impossible to try other approaches if it doesn't work? What is the probability this approach will be successful?
- ✓ Is the funding adequate for the work proposed or that needs to be done?
- \checkmark Is the timeline realistic?



SETTING CLEANUP OBJECTIVES

Most states have published remediation objectives, the allowable levels of contamination for residential and industrial properties. Is this the best that communities can do? Not necessarily.

Kim Wasserman-Nieto remembers: "...[The] argument that we had was a question of levels. In the federal government EPA regulations, the EPA federal level allow 1 ppm EPA of PAH.

The Illinois EPA, however, requires 0.001 ppm.

We thought it was irresponsible for the EPA to propose a federal guideline when our state guideline was much, much safer. And the EPA said absolutely not. We are only required to follow federal law. And we pushed back ... we protested outside their office, we petitioned them. We went to hearings. Anything you can possibly think of, we did."



"We went directly to Honeywell and said, We can continue to negotiate or we can fight. We don't care how long it takes us, ... At that point, Honeywell staff said, okay we'll work with you. When we said the Illinois standard is 0.001 ppm vs the EPA's cleanup standard of 1 ppm, the VP for public relations looked at her engineers and said, okay, how many more homes is that? We went from [remediating] 44 homes to 177. She said okay."

restrictions on land use be in place post-cleanup?





I inda Segal was one of many who advocated for testing of Dow Chemical USA New England Lab site in Wayland, MA. The state had the authority to oversee a cleanup to the state standards, but the community group members along with Toxics Action Center pushed for a more comprehensive cleanup. "The town had already voted to acquire the property ... with a permanent deed restriction that housing could never be built so the thinking at the time was that it would be mostly conservation, open space and ... recreation. Dow wanted to exit the clean up with as little liability as possible. The company agreed to cleanup to background levels."

Usually the state's limits or standards for contaminants are used as cleanup objectives. The goal of the cleanup will be to bring the levels of contamination below the state's standards. If there is no standard, involved parties will have to agree on one. Regulators and environmental professionals will look at the risks posed to residents, workers, water supplies, etc. If there is no chance of contact, regulators may agree the owner can leave contamination on site.

Risk assessments should protect the most vulnerable people (e.g., small children) and take into account the use of the property now and in the future.

Note that the risk assessment will only cover the area where contaminants are. If there is a nearby

pond, the risk assessment will cover wading and swimming only if tests have shown the pond is contaminated.



Find out what the remediation objectives are for the contaminants of concern.

Spread the word about what the cleanup will and will not accomplish. Will any

Ask experts how "clean" is realistic and compare to the state's remediation objectives.

Approach the site owners. Ask if they are willing to go beyond what the state requires.



CHECKING PROGRESS

During the cleanup, crews should be testing air and water to make sure their actions do not spread the contamination. Some soil and water tests should be done near the perimeter of the contaminated area. These are the way to monitor the plume, to see if it is moving off-site.

You should never see a dust cloud over a site. The workers should have controls in place to contain the dust. They might spray water to keep dust down or use a cover.

In one site cleanup, we took video footage of the contractors taking out tanks and spilling oil. They did a lot of bad things.

Selene González, LVEJO

As you examine the reports, pay special attention to the units.

1,000,000 micrograms/liter (µg/L)

| part per million = 1,000 parts per billion

1,000 milligrams/liter (mg/L)

0.001 kilogram/liter (kg/L)

| gram/liter (g/L)

1 ppm = 1,000 ppb



These are all the same number! The idea is... 1,000,000 μg/liter [is] the same as 1,000 milligrams/liter, [and that's] the same as 1 gram/liter and it's the same as 0.001 kg/L.

If you get a lab report that says 0.0001 kg/L, you go, oh this is a really low number. It's really low. So you want to be paying attention to the units because it's really a million micrograms per liter. Most water standards are going to be in micrograms/liter, ... Really, understand the units. --Christene Binger, Hydrogeologist

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Going Solo? Got a Group?

Do the activity *Sampling Plans* with a local map and compare with the map of test sites. Do you feel confident that the sampling sites are well-placed and will make people feel safe with data from the spots chosen for testing?





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COMPARING AND ANALYZING

As the cleanup progresses, you expect to see the levels of contaminants decrease. Will this always be the case? No. Should you panic? Not until you find out why. Then ask how the next steps in the cleanup will take this into account. For example:

1) Chemical compounds break down, so one level goes down, but now two other chemicals are present in higher amounts.

Ask: What will happen with these? Will they volatize (release into the air)? Break down over time? Be removed with a different remediation method? What are the risks to nearby residents, pets, or to the environment?

2) Seasonal changes. The water table goes up and the concentration goes down. The contaminant will be more diluted or more concentrated depending on how much rain, snow, or melting has occurred.

Ask: Are these contaminants water soluble? Will the levels fluctuate every season?

3) Testing reveals a new source of contamination a part of the plume that earlier testing missed.

Ask: What sampling will be done to see how extensive this plume is? What methods will be used to address this? How will it affect the cleanup timeline?

4) Because of groundwater flow, contamination may move toward or away from a sensitive location. Or it may sink into the ground, so shallow wells show lower levels but deeper wells show higher levels.

Ask: Will additional monitoring be done? What steps can be taken to protect water supply or vulnerable people?

At GP-28 3–15' depth (see next page), the level of Trichloroethene started out very high: 350 μ g/l. and then dropped off, but then increases. What are the likely and unlikely reasons?







COMPARING AND ANALYZING (ANOTHER APPROACH)

Analyzing the data vertically on a strip makes it easy to see which levels are higher than the remediation objectives and by how much.

The comparison to the Preventative Action Limit is done for you on the second strip. On the first strip, add labels for ten and twenty times higher than the Rhode Island Groundwater Objective. Which results are far above the Rhode Island Groundwater Objective?

GP-28)ate																	
	Base	eline																		
Shallow Aquifer Monitoring Well	1/2/2	2008	01/05/2009		04/01/2009		07/08/2009		10/12/2009		01/04/2010		04/30/2010		07/10/2010		10/13/2010		01/05/2011	
Screen From 3'-15' BGS	Result	Limit	Result	Limit	Result	Limit	Result	Limit	Result	Limit	Result	Limit	Result	Limit	Result	Limit	Result	Limit	Result	Limit
VOLATILE ORGANICS															_	-	_	_		
Trichloroethene	<	5.0	350	1.0	۷	50.0	23	5.0	<	1.0	6.4	1.0	46	1.0	7.2	1.0	۷	1.0	19	1.0
Tetrachloroethene	<	5.0	2,900	1.0	۷	50.0	15	5.0	1.5	1.0	<	1.0	30	1.0	61	1.0	<	1.0	2.9	1.0

Notes:

PAL = RIDEM's Preventative Action Limit RIDEM GA EXCEEDANCES ARE IN BOLD AND HIGHLIGHTED GREEN PALS EXCEEDANCES ARE IN BOLD AND HIGHLIGHTED BLUE



Trichloroethene at GP-28



ONGOING REPORTING TO THE COMMUNITY

In the cover letter or report narrative, consultants will explain where results are meeting the remediation objectives and where they are not. If some event slowed the cleanup, that will be in the report as well.

The air sparge and soil vapor extraction system at the Charbert facility was damaged and turned off due to flooding on March 15, and March 30, 2010, respectively. The March flooding damaged the electrical components of the systems which were repaired and the systems resumed operation on August 26, 2010.

> pg 1, Third Annual ICMP, Charbert Facility, Richmond, Rhode Island

The reports will let you know where contaminants are still above the remediation objectives

The results of the untreated well water testing at 14 River Street have predominantly been nondetect since February 2005, with the exception of trichloroethene (TCE), which has been detected four times since February of 2009. The detected concentrations of TCE range from $0.71 \mu g/mL$ to $1.2 \mu g/mL$; whereas the RIDEM GA Groundwater Objective for TCE is 5 ppb.

pg 16, Third Annual ICMP, Charbert Facility, Richmond, Rhode Island

Got a Group?

Use the activity Finding Newsworthy Data to draft messages about how levels of contaminants are changing.

Use The Summary vs. The Lab and Converting Between Units as a way to practice looking for errors in units.



Linda recalls: "We wanted to know the problems had been resolved. ... [The experts we relied on] taught us not to over-react because we heard the name of a chemical. ... You needed to be persistent and vigilant. We needed to stay on top of the cleanup."

1

I found a mistake: the number for dibenzo(a,h)anthracene was <0.023 and it should have been 0.23 in bold.



Community Member Checklist

- Spread the word about any delays.
 - Check the lab results against the consultants' report for errors such as mixed up digits or results listed under the wrong contaminant name.

Use the data available to let neighbors and decision makers know how contamination levels found in test results compare to remediation objectives.



X/////



Additional Testing

Back in Little Village, the city owned a triangle shaped lot along the railroad tracks. The small lot was promised to the community for a garden. It had once been owned by D.A. Stuart & Co. for lubricating oil and grease and it needed to be remediated. The Little Village Evironmental Justice Organization and its lawyers made a case for a cleanup to background levels.

The cleanup took longer than expected. Finally the city and its consultants declared it done. But no one rushed in to garden. Additional rounds of testing had to prove that the cancer-causing levels of contaminants met the state's objectives. Community members checked the maps to make sure that samples were taken from the places where levels had been high in the past. To insure the gardeners' safety, the site will have raised beds filled with clean soil.

At some point monitoring results will show contaminant levels meeting the cleanup objectives. Hooray! But the cleanup process is not yet complete. Monitoring should continue for a full year after all the cleanup activities have stopped. The results should show that the average levels of contaminants are consistently below the cleanup objectives. Once a site is considered "clean," the owners or the state should test annually for five years and then every five years after that. These test results should show that the levels of contaminants are the same as or lower than when the cleanup wrapped up.

Got a Group? Going Solo? S

See the activity *Inside Averages* to get a sense of how consultants might present the data to argue the cleanup is over.



Linda remembers that Dow Chemical invited the community to a walk-through of the site. Dow representatives gave out stakes and asked community members to mark any places where they wanted more testing.



Community Member Checklist Check that any contaminants still present in the soil are below levels considered to be a danger to humans. Check the report to see if any contaminants still present are likely to affect drinking water sources. Create pressure for ongoing testing if needed. Spread the word about the site's condition. In the rush to wrap up, sometimes consultants grow careless. Check that testing wasn't suspended after one low value that could have been due to heavy rains, for example. Check that outliers, or extreme values, weren't left out without suitable explanation.



PUBLICIZING THE RESULTS

Consider your audience

It is very easy to turn away from the problem once the cleanup begins. People in the community often expect that everything is going as planned. Since this is not always the case, keeping the problem in the public eye keeps the pressure on to meet the timeline, and cleanup goals.

Few people will have the patience, interest, or time to examine the reports. So those who do, play an important role as watchdogs. They or others can take the lead on turning data into information.

Got a Group?

Use the activities and strategy sheets in *Communicating with Numbers* for ideas about expressing numbers creatively in words and images, and on a fact sheet.

Community Member Checklist
Craft a short statement or story backed up by numbers.
Explain any numbers with common comparisons or units people use in from everyday life.
Use a graph or visual to support your statement.
Test it out. If someone who has not been involved in monitoring the clean up can understand it in half a minute, keep it. If not, simplify it!
Take advantage of anniversaries or milestones to get media attention.

About the Cleanup at Charbert

The facts:

Over time in some monitoring wells, levels of carcinogens like vinyl chloride have spiked then decreased.

• At one spot, the vinyl chloride was once 1,200 micrograms per Liter (more than 600 times the state's groundwater objectives). It dropped from 200 times the objective to just double the objective. This site still needs attention.

• At RIZ 7, vinyl chloride levels are consistently over 10 times the state's preventative action limit.

The message:



The cleanup is not over yet!





Appendix

LIST OF HELPFUL RESOURCES

Note: A specific web address for a resource may change with time. If you can't find a resource directly, do an internet search for the title (in bold, below).



