



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 24 1982

MEMORANDUM

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

SUBJECT: Briefing Document for September 27, 1982,
at 11:00am on Region VII, Dioxin Issues

FROM : Conrad O. Kleveno *CK*
OSWER Dioxin Coordinator

TO : Rita M. Lavelle
Assistant Administrator

The briefing package includes the following items:

1. Agenda
2. Participants
3. Assessments
 - ✓ a. Risk/Exposure Assessment of Region VII Sites
Dr. Donald Barnes, OPIS
 - b. Risk Assessment
Dr. Robert McGaughy, Director, CAG
 - ✓ c. Risk Assessment at other sites
Dr. Barbara Ellis, OSWER
 - ✓ d. Non-Cancer Risk Levels
Dr. Art Pallata, OSWER
4. Options - Barbara Ellis
 - ✓ a. .01 - .05 ppb - Pros & Cons
 - ✓ b. 1 ppb - Pros & Cons
 - ✓ c. 100 ppb - Pros & Cons
5. Background briefing material
 - ✓ a. Region status at sites - Region and ERD
 - ✓ b. Priority list issues - MSCD
 - ✓ c. Enforcement Options
 - ✓ d. Status of proposed RCRA regulation - OSW
 - ✓ e. Dioxin Task Force memorandum
6. Other (FYI)
 - a. Region management plan
 - b. OLEC concerns Memo to DTF Chairman
 - c. Sturgeon Spill

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Items 3 and 4 will be the major discussion issues. The other
background material is for your information.

OPTION: Cleanup to the detection limit of 0.01 - 0.05 ppb*

PRO: Consistent with the cleanup levels in consent decrees at Hyde Park, Syntex and Vertac.

Consistent with Superfund levels of cleanup at Love Canal.

As protective as technologically possible.

Consistent with Agency statements on the hazards of TCDD.

CON: Likely to be a very expensive cleanup

- absolute cost will be high

- availability of disposal options will be limited

May be viewed as overkill

Sampling costs are very high, and procedures are time consuming.

- * Background levels of TCDD in the area may be above 0.05 ppb, in which case cleanup under this option would be to the background level.

OPTION: Use 1 ppb as the cleanup level for the preliminary actions (Preliminary injunction and/or planned removal actions) and continue analysis to determine final acceptable cleanup level.

PRO: Allows immediate action for Agency, and good press.

Buys time

- Allows time for reassessment of Agency risk analysis methods and policies, SAB review, and other scientific review.
- Allows preparation of public for possible change in policy.

Intermediate cost option

Consistent with Neosho order

Removes major source of risk

Easily implemented, sampling is relatively inexpensive and easy

CON: Not the final solution, the problem will be ongoing until final resolution

If final cleanup level is 1 ppb, then still have inconsistency with cleanup levels at Hyde Park, Syntex, Vertac and Love Canal.

Based on cost and need for immediate action, not total health protection.

OPTION: Use 100 ppb as a cleanup level. This Option could be used to "buy time" as in Option III, though if no action is taken, the position of the Agency that we are considering other action is likely to be less convincing.

PRO: Possibly no action or limited action is needed at the Horse Arenas.

There are higher risks taken every day (e.g. smoking).

Provides forum for any desired policy change.

CON: Could create extreme political backlash.
Public and press scrutiny will be substantial.

This is an involuntary risk.

Conflicts with previous guidance regarding hazards of TCDD as a carcinogen.

Conflicts with previous agency policy that risks above 10^{-5} to 10^{-6} are unacceptable.

Conflicts with filed §106(a) order at Neosho, Mo., which requires cleanup of soil with 62 ppb of TCDD.

Conflicts with cleanup levels agreed to in consent decrees at Hyde Park, Syntex, and Vertac.

Conflicts with Superfund cleanup levels at Love Canal.

Conflicts with Missouri State Court ruling which granted damages to persons exposed to 22 ppb in soil.

DRAFT

Meeting No. 2
April 25, 1980
9:30 W93513

Summary of the Chlorinated Dioxins Wrok Group (CDWG) Meeting

1. The attached agenda was distributed and followed.
2. A draft summary of the April 18 meeting (No. 1 meeting) was distributed and comments requested. With one minor change the material is ready for final.
3. At the TSPC meeting last Friday a brief mention was made of CDWG activities and our plans for dealing with Hempstead. It was thought to be inadvisable to distribute the memo discussed at our last meeting since the directly affected DAA's had not yet been contacted. These matters:
 - a. initial funding by OSW
 - b. more active participation by Air programshave now been handled directly. OSW has put forward \$300K and Air has volunteered the services of Jack McGinnity (FTS 629-5204).

STATUS

ACTION

4. In order to pursue the risk assessment in connection with Hempstead, Mike Dellarco should provide Wright and RTP analytical data to Jack McGinnity (for plume modelling) and to Tom McLaughlin of CAG.

ISSUE

5. Dropping the other shoe in the Vertac story he started last week, Gordon Olson told us that the Section 6(d) hearing on Vertac's request for consideration of 2,4-D production wastes would be completed around May 1. The Agency has 10-days in which to render a final decision. The crux of the issue lies in the fact that the 2,4-D wastes probably contain a decreasing amount of TCDD, left over from the glory days of 2,4,5-T production. While the 6(d) rule speaks of relatively small storage costs for such wastes, Vertac calculates that the cost of storing the corrosive 2,4-D wastes will be about \$150,000 per year.

REFERRAL

Further discussion revealed that OCC is the proper group to consider the relative economic impacts and the Dioxin Task Force (DTF) is the proper group to suggest alternatives for handling the wastes. Therefore, this matter was referred to OCC (Gordon Olson) and DTF (Russ Wyer) for immediate attention in order to develop an Agency position by May 12.

ISSUE

6. Rich Smith brought the CDWG up to date on the civil suit against VERTAC, which deals with their water basin, leaching, other matters not directly related to the barrels. The suit seeks to eliminate any TCDD in process waters, to cap and monitor soil contaminated areas, and to institute best engineering practices at the facility. In considering the problem the judge will probably inquire about the status of the 2,4,5-T drummed wastes problem,

STATUS

The newly formed DTF has ^{consideration of Vertac's drum problems} as one of its top priorities.

7. Gordon Olson reports that Vertac no longer speaks of its "TCDD destruct process" in terms of treating the 2,4,5-T wastes, but rather in terms of destroying any TCDD that might occur in 2,4,5-T itself.
8. In an addition to the old business items on the agenda Paul desRosier reported that Hooker has been told that it should treat the dioxin contaminated land around Bloody Run with the same level of precaution as it would with a plutonium contamination problem. Estimated cost: \$5-10 million. The alternative--capping in place--would be much less expensive.
9. The relationships between TSPC, CDWG, DTF, and Dioxin Sources Sub-group (DSS) were explained. See attachment.
10. Russ Wyer, newly appointed chairman of the DTF, explained the plans of his group. After gaining experience by treating problems associated with certain specific sites, the DTF will develop general guidance and policies designed to deal with the majority of dioxin-related situations. The DTF will be a small group involving OPTS, ORD, OSW and OHWETF. This core will be supplemented by expertise within and outside the Agency as needed.
11. Don Barnes will draft guidance for the Regions, describing the procedures which should be followed in notifying and requesting assistance from Headquarters. The CDWG will be notified, with the DTF providing the single technical voice responding to each such request. This guidance will be issued on behalf of the TSPC or the Administrator's office.
12. The status of the Dioxin Sources Sub-group (DSS) was reviewed.
 - a. Its first meeting was held on April 24; minutes are available.
 - b. CDWG members asked the DSS to be aware of the presence of trichlorophenol (TCP), a bactericide, in the make-up water and the boiler water of the plant.
 - c. The need for interim guidance for the resource recovery industry and other members of the public was discussed. Such Guidance should refer to related research in this country and abroad which indicates the need for high temperatures and high residence times in order to minimize dioxin formation. In addition, considerable evidence points to the fact that dioxin formation in combustion is directly related to the presence of dioxin precursors in the feedstock. Jack S Hackelford and OSW will draft such guidance and circulate it to the members of CDWG.

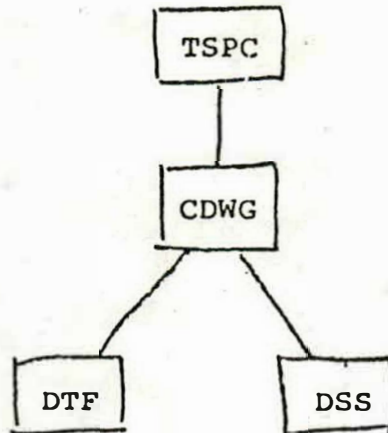
ACTION

ACTION

THE WONDERFUL WORLD OF DIOXINS

You can't tell the players without a program

Toxic Substances **priorities** Committee (TSPC)
Chlorinated Dioxins Work Group (CDWG)
Dioxin Task Force (DTF)
Dioxin sources Sub-group (DSS)



TSPC: AA's and DAA's of the agency who collectively examine cross-cutting issues related to toxic substances

CDWG: Intragency work group established to keep abreast of issues related to chlorinated dioxins and to recommend policies for the agency. **Reports to TSPC.**

DTF: Established by TSPC to handle site specific dioxin related issues ^{and to} recommend procedures and policies by which future situations can be dealt with. Reports to CDWG.

DSS: Established to deal with specific problems associated with Hempstead, Long Island incinerator, more general question of resource recovery incinerators, and the overall question of all large scale combustion processes. Reports to CDWG.