

**GIDLEY LABORATORIES, Inc**  
FAIRHAVEN, MASS., U.S.A.  
02719

Site: <u>New Bedford</u>
Break: <u>4.1</u>
Other: <u>47711</u>

February 6, 1985

Mr. Larry Jackson  
Laramie Energy Technical Center  
Department of Energy, Box 3395  
University Station  
Laramie, Wyoming 82701

RE: ASTM Committee D-34 on Waste Disposal

Dear Mr. Jackson:

Enclosed herewith is a copy of our letter to the concerned sub-committee chairman with comments on the proposed method of analyses of organics from aqueous waste leachates.

We confirm and endorse many of the concerns of the W. W. Hannemann, Kaiser Aluminum and Chemical Corporation, Center for Technology, P.O. Box 877, Pleasanton, California 94566, namely:

A. RCRA/EPA Analytical Open Ends

1. Expansion of listed factors
2. Progressive reduction of detection limits overtime.
3. Establishment of lower allowable limits as detection limits are reduced.

B. Dual Standards of RCRA and CERCLA

The conflict of RCRA and CERCLA obviously creates problems of judgment and control but may also create real hazards evaluating groundwater quality, especially where very toxic contaminants are concerned.

In general, I believe it is essential to promptly establish a reasonable protocol of analytical procedures even if it is not perfect, and then to amend the protocol as improved methods, procedures and detection sensitivity are researched and developed.

In any case, protection of groundwater, especially drinking water supply aquifers, will not be in fact so much protected by particular

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B. Dual Standards of RCRA and CERCLA (continued)

analytical standards as field procedures and regulations to contain the contaminants and shield the supplies (1). Additionally, it is imperative to stop the practice of shoveling up hazardous waste sites and shipping the hazardous materials elsewhere to another site (even if RCRA approved).

"DON'T MOVE IT!"

We must also eliminate, avoid or reduce the present extremely dangerous practice of creating Supermarket Dumps for all types of mixed hazardous wastes (which greatly increases the problems of testing and monitoring the leachates but also all too often creates hazards by mixing two or more classes of chemicals which would not be hazardous, or as hazardous, if deposited separately) (2).

A single 600-acre hazardous waste dump is also much more difficult to design, construct, monitor, control or remedy than sixty 10-acre sites with less mixing.

"DON'T MIX IT!"

Also, even more fundamentally much more strenuous efforts must be made to eliminate, reduce or control the initial production of hazardous wastes at the point of origin as by chemical treatment, distillation, methods engineering, filtration, separation, etc. (3), (4).

"DON'T MAKE IT!"

Sincerely yours,

GIDLEY LABORATORIES, INC.

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Dr. Philip T. Gidley, FAIC, FAAAS  
President

PTG/plp

References:

- (1) Philip T. Gidley, "Surface and Groundwater Protection Issues," Symposium on "Water Supply in an Urbanizing Environment," November 7-9, 1979, Sturbridge, Mass.; USDA, January 1981, University of Massachusetts.
- (2) Philip T. and James S. Gidley, "The Exeter Plan," GIDLAB Project ENC-643-HW, Copyright 1980, GIDLAB.
- (3) Philip T. and James S. Gidley\*, "On-Site Reduction and Detoxification Workshop," Northeast Conference on Hazardous Waste, October 24, 1980, Portsmouth, N.H.

References: (continued)

- (4) Philip T. Gidley, "Toxic Chemicals: Strategies for Reduction" prepared for the Toxic Waste Assessment Program of the California Office of Appropriate Technology, January 23, 1981.

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\*Presently Assistant Professor of Civil Engineering at West Virginia University.