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ACE file

PCB Dredging and Disposal - New Bedford

Comments on Corps of Engineers'
Response to GIDLAB's Preliminary Notes

GIDLAB EC-87-C

1. Selenium Response

   Acceptable

2. Dibenzofurans and Hexachlorobenzenes Response

   Not acceptable--although this factor is apparently the province of EPA not the Corps of Engineers.

   GIDLAB refers again to PCB/DF ratio chart in GIDLAB's original comments. This is a serious toxic problem which should be investigated.

3. Tide Gate Response

   Acceptable

4. Standard Methods Sampling and Analysis Response

   Acceptable

5. Standard Methods Leachate Tests Response

   GIDLAB believes that the C.O.E. response misses GIDLAB's emphasis. GIDLAB does not endorse the "standard EPA" tests as perfected or even adequate for all leachate purposes (in fact, GIDLAB has been highly critical of specific uses of these tests and has submitted--and uses--its own GIDLAB leachate tests--see Appendix). However, the merit of at least running the "standard" tests is that it allows a basis of comparison with many other tests at many sites and by many other investigators and also serves as a parallel control. GIDLAB's criticism of the "standard" test is not so much its lack of relevancy (no standard test is ever totally an analog of a specific case) but to the lack of severity of the standard test--which ignores the Worst-Case Scenario.

6. Chemical Clarification--Polymer Test Response

   GIDLAB agrees with the C.O.E. concept but reiterates the points that (1) sedimentation has been successful in lab tests and full-scale

6. Chemical Clarification--Polymer Test Response (cont.)

field jobs without polymers; (2) polymer addition is technically difficult and costly in field work; and (3) many competent investigations have not found any of the many polymers tested and have not produced satisfactory results (cf. GIDLAB original citations).

7. Sediment Stabilization Tests Response

Acceptable

8. Disposal Site Drainage and Monitoring Response

GIDLAB appreciates the C.O.E. intention to investigate the "need." GIDLAB stakes a stronger position that a drainage system with pump-out and monitoring provisions is absolutely essential for all hazardous waste disposal sites.

9. Ground-Water Contamination Response

"Leachate tests (to) characterize the liquid drainage at the disposal site" may be helpful but should not (regardless of leachate results) avoid the necessary placement of drainage and monitoring.

10. Sampling Tube Procedure Response

The engineers' response defining the objective as "depth" studies eliminates the validity of GIDLAB's original comments.

11. Clean Sediment Response

The province is apparently EPA not C.O.E.; in any case, the response is not acceptable and has been previously separately addressed by GIDLAB.

12. Local Clay Liner Testing Response

Acceptable, except that in place of clay or synthetic liners, various organic soils (e.g., podzols, bog soils and humic matter) could be used.

13. Containment Sites Response

a. GIDLAB still believes the Upside-Down-Cake method is unacceptable from several viewpoints: (1) very high cost, especially if ledge is encountered; (2) technically difficult; (3) environmentally hazardous in storing dredged material awaiting bottom excavation; and (4) lack of long-term monitoring and drainage systems factor.

b. Containment behind sheet pile walls is already accepted by EPA for the Aerovox factory site.

GIDLAB amplifies its proposal of containment behind sheet metal walls is made with the following adjunct conditions:

(1) Drainage system and monitoring

(2) Concomitant addition of lime (cf. also Paul Anderson's suggestions).

(3) Concomitant addition of coal fly-ash (readily available less than 20 miles away from Brayton Point or Montaup).

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