

STATE OF MARYLAND — DEPARTMENT OF HEALTH AND MENTAL HYGIENE

MEMORANDUM

Copies

Official file, EH:SE:SW
 2nd Floor - O'Conor Bldg.
 All members - Subcommittee
 on Disposal
 Dr. Max Eisenberg
 Mr. Walter A. Miles

TO MEMORANDUM FOR THE RECORD **From** Division of Solid Waste Control, EE:SE:SW **Date** 5/17/76

Subject Kepons Subcommittee on Disposal - Meeting of May 13, 1976

On May 13, 1976, a meeting of the Kepons Subcommittee on disposal was held to discuss matters relating to the Allied Chemical Plant at 2000 Race Street. In attendance were:

- | | | |
|----------------------|---|--|
| Sam Morekas | - | Division of Solid Waste Control, DEMH |
| Walter A. Miles | - | Division of Solid Waste Control, DEMH |
| Richard Nace | - | Division of Solid Waste Control, DEMH |
| William E. Yanovitch | - | Water Resources Administration |
| Winston Miller | - | Baltimore City Health Department |
| F. Stanley Kinney | - | Bureau of Research, SHA |
| Vernon Goodwin | - | Baltimore City Interstate Division, SHA |
| William M. Reiter | - | Allied Chemical Corporation |
| John Magliocco | - | Allied Chemical Corporation |
| John M. Devoe | - | Allied Chemical Corporation |
| Harry W. Trask | - | HWMD/OSWMP, EPA Washington D. C. |
| Francis M. Alpiser | - | EPA Region III, Philadelphia, Pennsylvania |
| Bill Schremp | - | EPA Region III, Philadelphia, Pennsylvania |

Several items of concern were discussed. Each will be described separately below.

I. Swann Park

The subcommittee was informed of the present situation and the methods being used to place new sod at the park. These methods are as follows:

1. Discing of the contaminated area along the fence, consisting of a 185' wide strip adjacent to the main baseball diamond and a 100' wide strip on the lower end of the park.
2. Placing of 4-6 inches of topsoil on the disced area.
- ~~3. Addition of lime to bring the soil pH up to a level conducive to grass growth.~~
4. Installation of sod.

Allied Chemical has agreed to provide water to Baltimore City to aid in establishing the new sod.

Mr. Trask (EPA) expressed concern over the use of lime to raise the soil pH. He cited published reports that indicate that Arsenic is "fixed" at low pH's and more soluble at higher pH's in the soil. He

MEMORANDUM FOR THE RECORD

May 17, 1976

Page 2

recommended that lime not be used.

It was agreed that, although this is a concern, some pH adjustment is needed to establish the sod. Therefore, the area that appears to be most heavily contaminated (a 50' side strip along the fence), will not have lime added. The remainder of the area will be treated with lime.

II. Erosion Control at Disposal Area

Allied Chemical presented a copy of the construction permit issued by Baltimore City for the grading and covering of the disposal area. The City has added a provision that requires Allied to place topsoil and to seed the affected area upon completion. Bill Yanovitch (WRA) stated that, since construction will begin in the area within one year, the interim erosion control measures being taken now (i.e. straw bales around the perimeter of the site) will be sufficient. Mr. Goodwin (SHA) agreed to contact the City on this matter and to request that the requirement for topsoiling and seeding be rescinded.

III. Highway Footings in the Disposal Area

Mr. Goodwin (SHA) informed the subcommittee of the State Highway Administration's intention to excavate portions of the disposal area for the placement of the footings. He stated that Allied Chemical's recommendation to relocate the footings on the surface of existing grades would increase costs as much as \$250,000 -- primarily because of the need for additional fill material. After much discussion, it was agreed that excavation sufficient only to allow the tops of footings to be level with existing grades would be permitted. However, the bottoms of excavations must not penetrate the groundwater table. Should any groundwater be encountered, all such water must be collected, analyzed, and treated prior to discharge. It was further agreed, as an interim recommendation pending completion of the groundwater study, that all excavated material will be retained at the immediate vicinity of the disposal area.

IV. Groundwater Study

The proposed study on the groundwater conditions in the disposal area, that will be performed by Allied's contractor Geraghty & Miller, was described to the subcommittee. No objections to the proposal were raised at this time.

Mr. Reiter (Allied Chemical) stated that there were some questions as to the procedure for the Total Chlorinated Hydrocarbon analyses. Allied will resolve these questions and report back to the subcommittee.

Copies of Mr. Yanovitch's notes of the meeting of May 12 with Geraghty & Miller and Allied Chemical were distributed to the subcommittee members. The detailed proposal will be distributed to the subcommittee members as soon as it is received.

MEMORANDUM FOR THE RECORD

May 17, 1976

Page 3

V. Disposal

An updated inventory of Kepone related materials now being stored at the plant is attached. Additional materials will be generated as decontamination of the Air-Milling operation proceeds. Pumpable liquid wastes from this operation will be stored in a 10,000 gallon rail tankcar. Solid wastes will be placed in drums and stored in the Quonset hut with the other materials. Disposal methods for these materials were discussed by the subcommittee. Allied Chemical has been in contact with several firms in the country in reference to the washout sludges. The most promising of these is Chemtrol, near Niagara Falls, New York. No decision has been made by Chemtrol as yet.

Incineration of the non-Arsenic containing Kepone materials is being considered. Incinerators located in three military installations are being investigated as to the possibility of their use. They are:

1. Fort Detrick
2. Edgewood Arsenal
3. Indian Head

Of these, the proposed high temperature incinerator at Indian Head appears to be the most promising. Mr. Trask (EPA) will approach the Department of Defense on this matter. Another unexplored possibility is the use of local reclamation firms. A meeting has been scheduled, May 25, with Mr. Robert Taylor of American Recovery to discuss this matter.

Sam Morekas, Head
Hazardous Waste Section

Richard Nace
Sanitarian

SM:RN:bjf

Attachment

CH2M0000164