

Toxaphene Analysis Flawed Next Steps to Correct the Problem

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The EPA Inspector General (IG) released his report on the Hercules 009 Landfill Superfund Site on September 26th, and recommended appropriate testing for toxaphene be conducted. The report was prepared as a result of numerous inconsistencies with toxaphene containment identified by the Glynn Environmental Coalition (GEC). “When modifications were made to the EPA's toxaphene analytical method in 1993, we suspected toxaphene present may not be reported,” said technical advisor Dr. Kevin Pegg. “Repeatedly, the Toxaphene Task Force method failed to find toxaphene when it was present in large quantities. Since the containment was based upon flawed data, there is no assurance that all contaminated soils in the neighborhood and schoolyard next to the Superfund Site were removed.”

The IG noted that the modified analytical method used was not effective for detecting degraded toxaphene in soil, water, and fish. The severity of the problem was demonstrated when 56 fish samples were analyzed and were reported as no toxaphene present. When more accurate analysis was done, toxaphene was found at over 52 times the EPA's "do not eat" level for toxaphene.

For the past 12 years, toxaphene has been analyzed in Glynn County by a flawed method. This includes sampling of neighborhoods, schools, and six toxic waste sites. Our goal is to have all areas sampled by the flawed method re-tested. **At the top of our priority list is Altama Elementary School that abuts the Hercules 009 Landfill Superfund Site.** Like the IG said, the previous method was inadequate, and we should not take chances with our children's health and safety.

The GEC has met with Glynn County Schools Superintendent Michael Bull to form a partnership to move sampling and analysis at Altama Elementary forward with all due speed. The GEC has worked well with our school administrators in the past, as in the testing at Goodyear Elementary School that led to removal of toxic soil from the schoolyard. We look forward to building off our successes in keeping our schools safe for our kids.

The Hercules 009 Landfill Superfund Site containment plan has been changed significantly since the legally binding agreement was signed by Hercules and the EPA in 1992. There were five major changes that significantly changed the protectiveness of the remedy. Instead of treating all the toxaphene sludge, only sludge above the water table was solidified with cement, leaving up to a 10-foot thick layer of sludge untreated. This reduction in sludge treatment significantly reduced the amount of contaminated soil that was treated. Initially, the EPA promised to treat the sludge in place but did excavate what was treated, which caused exposure to those that live and work around the Superfund site. Once the containment was complete, there were confirmation samples to be taken to assure that all sludge was treated, which has not been done to date. In light of the changes made which assure that all sludge was not treated, this is not a surprise but still needs to be done to

assess containment work completed to date. Once the containment work was complete, a clay cap followed by soil was to be placed over the Superfund site. Instead, contaminated soil was spread over the top and mixed with a little cement, followed by clean soil to grow a grass cover. With so many changes made to the containment plan, confirmation sampling is needed in the soils underlying the Superfund site, in addition to the groundwater sampling recommended by the IG. Both the groundwater and soil confirmation samples should be analyzed by the method recommended by the IG.