

~~FOR: [illegible]~~ MMG: [illegible]
RE: Eng. Stds.

VISTA

Thomas G. Grumbles

to Tom Heller
Charlie Dotra

Date 10/6

This guidance Document
may be a useful one to
buy.

Please let me know if you do.

TSS

File - Eng. Standards

VVV 000015530

believed to be continuing today. Murtha was hauling allegedly improperly bagged asbestos in violation of his landfill permit, which only allows the disposal of municipal wastes at the site, Sharron claimed.

However, Connick asserted that the Laurel Park Landfill had not accepted toxic waste in over six years. Under the terms of Murtha's landfill permit, the site will reach its maximum capacity for municipal wastes by the spring of 1987 and will be closed, she said.

Groundwater Contamination in Maryland

Trans-Tech Inc., an electronic parts manufacturer in Adamstown, Md., agreed to pay about \$300,000 to study groundwater that may be contaminated with toxic chemicals from the company, according to Meade Felton, coordinator of the study for the company.

Traces of TCE were found in portions of Adamstown's water supply, according to Ann Cardinal, Superfund Community Relations Coordinator for EPA Region III. Trans-Tech's Adamstown facility was considered a possible source of the contamination, because the company used to maintain TCE storage tanks on the site, Cardinal said.

Although the company agreed to pay for the hydrogeologic study, a question still exists as to whether Trans-Tech is responsible for the contamination, Felton told BNA Sept. 9. Trans-Tech bought the property in 1980, but the site had undergone industrial usage for several decades prior to 1980, Felton said.

The groundwater study is to be completed by Dec. 10, according to Cardinal, and is designed to provide information concerning the extent of contamination and the direction in which the TCE plume is moving.

In May, the agency initiated an emergency removal action under CERCLA in Adamstown and supplied drinking water filter systems to 13 homes in the area, Cardinal said. The company had supplied bottled water to homes since 1985, but EPA determined that further action was required to ensure that residents were able to wash with uncontaminated water, she added.

The company tried to reach an agreement with Maryland and Frederick County officials to provide a \$250,000 water system for the town, in exchange for a release from liability for groundwater contamination, but the state and county refused to accept the offer, according to Felton.

Instead, Maryland and Frederick County are going forward with their own plans to provide a drinking water system for Adamstown, at a cost of more than \$400,000, Felton noted. The area was expected to undergo substantial growth by the year 2000, and the groundwater contamination "accelerated" installation of the water line, he said.

Hazardous Waste

EPA SAYS INSTALLING CATHODIC PROTECTION MAY NOT PREVENT UNDERGROUND TANK CORROSION

Merely installing a cathodic protection system may not adequately protect a new steel underground storage tank from corrosion and thus may not ensure compliance with Resource Conservation and Recovery Act interim prohibition rules, according to an Environmental Protection Agency guidance document.

The guidance, released in late August, explained that the cathodic protection system used must prevent corrosion of underground tanks and piping for their operational lives, which is defined as "the time during which the tank stores regulated substances."

However, depending on factors such as soil resistance and proximity of "stray" electrical current from such sources as subway train tracks and underground power lines, certain protective systems may not be adequate, the agency said.

Under the 1984 amendments to RCRA, EPA is required to develop comprehensive regulations to protect human health and the environment from leaking underground storage tanks.

To provide protection until the rules are made final, the statute imposes an interim prohibition that requires prevention of releases from corrosion or structural failure for the operational life of any new tank. In addition, new tanks must be compatible with the product to be stored.

The agency guidance outlined design and installation practices deemed acceptable by EPA to meet interim prohibition requirements under the amendments.

Several Designs for Corrosion Protection

According to the guidance, several suitable designs exist that protect underground tanks from corrosion in addition to installation of proper cathodic protection systems for steel tanks.

Tanks constructed of fiberglass-reinforced plastic, which is the most predominant non-corrosive material used to manufacture underground storage tanks and piping, may also be used to comply with the RCRA interim prohibition, the document said. The agency said it is unaware of other materials that would satisfy prohibition requirements.

EPA cautioned that fiberglass tanks are more sensitive to mishandling during installation than steel tanks. Fiberglass tanks are lighter and slightly less flexible than steel and rely on backfill for up to 90 percent of their structural support, according to the agency.

Fiberglass tank manufacturers generally supply detailed handling and installation procedures which should be followed carefully by tank installers, EPA recommended.

A third method of preventing tank corrosion that complies with the interim prohibition is fiberglass coating of steel tanks, although there is some debate among corrosion control experts regarding the advisability of using any coating without cathodic protection, the agency document said.

Key factors in the success of steel tank coating were said to include thickness, dielectric strength, durability, and good bonding to the steel.

Advice on Installation Practices

The most common cause of structural failure of underground storage tanks is improper installation, which comprises a multitude of potential problems, the agency guidance noted. Common installation mistakes were said to include inadequate pit and trench design, improper handling of a tank at a site, and improper tank bedding and placement.

In addition, poor or unsuitable backfill material or compaction procedures may be used, the tank may be installed at an improper depth, and attachments such as piping may be improperly fitted, according to the guidance document.

To make proper installation decisions, the agency advised adequate characterization of the environment surrounding an underground tank, including bedding and backfill characteristics, high-water level, location and magnitude of soil loads over a tank, and likelihood of earthquakes.

The guidance document also contained advice on determining the compatibility of substances to be stored with various tank designs, as well as other information.

Copies of the document, "The Interim Prohibition: Guidance for Design and Installation of Underground Storage

"Tanks" (No. EPA/530-SW-85-023), may be obtained by calling RCRA/Superfund Hotline, toll free, at (800) 424-9346 or, in Washington, D.C., at (202) 382-3000.

Drinking Water

BNA RELEASES SPECIAL REPORT COVERING 1986 AMENDMENTS TO SAFE DRINKING WATER ACT

The Bureau of National Affairs, Inc. Sept. 12 released a special report covering the development and enactment of the Safe Drinking Water Act Amendments of 1986.

The 121-page volume details the provisions of the amendments, the legislative history, developments in the emerging environmental policy area of groundwater, Environmental Protection Agency plans to carry out the amendments, the effect on drinking water utilities, and the role of drinking water standards in the larger scheme of environmental protection.

Included in the special report is the text of the amended statute, the congressional conference committee's explanation of the amendments, and the executive summary of an EPA report outlining the role of drinking water regulations.

The special report, "The Safe Drinking Water Act Amendments of 1986," was written by William J. Kelly, copy editor on Environment Reporter.

It may be purchased for \$35 and is available from The Bureau of National Affairs, Inc., Customer Service, 9435 Key West Ave., Rockville, Md. 20850; telephone (301) 258-1033. Refer to product code 45-EDSR-05 when ordering. Quantity discounts are available: 6-10 copies, 10%; 11-25 copies, 15%; 26-50 copies, 20%; 51-500 copies, 25%; 501-1,000 copies, 30%; and 1,001-2,000 copies, 35%.

Research

LEAD LEVELS IN AIR AT GLACIER NATIONAL PARK ARE 10 TIMES HIGHER THAN EXPECTED, DOE FINDS

LOS ANGELES — (By a BNA Staff Correspondent) — Lead levels eight to 10 times higher than what would occur naturally have been observed in air at Glacier National Park by Department of Energy researchers, a scientist from the Idaho National Engineering Laboratory told a group of chemists here Sept. 8.

In a workshop presentation at the 192nd National Meeting of the American Chemical Society, G. Bruce Wiersma, manager of earth and life sciences for the DOE laboratory, said the observations reflect emissions of lead from automobiles and factories around the globe.

Scientists for the laboratory made the findings on lead as part of a "kinetic" study of 26 trace chemicals in the northern Montana park, done at the request of the National Park Service, Wiersma said. Levels of lead were found in the air of up to 5 nanograms per cubic meter, the scientist said.

Levels of lead and the other chemicals were measured in the park's soil, air, water, trees, and forest litter, Wiersma told the group, and lead was found at higher levels than expected.

Wiersma said increased use of kinetic modeling to study the fate of pollutants over recent years has led scientists to understand that environmental problems often are not confined to one medium, such as air or water.

However, he noted, environmental laws, such as the Clean Air Act and Clean Water Act, deal with pollution only in one medium. While it will take perhaps another 10 to 15 years to

perfect the application of kinetic modeling to environmental problems, Wiersma said that enough is already understood to begin to revise environmental laws to move regulators in a multi-media direction.

He said the reauthorization of the Water and Air Acts will present good opportunities for Congress to mandate that regulators take a multi-media approach to solving environmental problems.

Litigation

STATE NOT REQUIRED TO UPGRADE MASS TRANSIT IN CHANGING PLAN UNDER AIR ACT, COURT HOLDS

New York state is not required to upgrade the New York City mass transit system to offset reductions in motor vehicle use resulting from the state's plan to reduce ozone and carbon monoxide emissions, a federal appeals court ruled Aug. 28.

The Environmental Protection Agency properly approved revisions to the state's implementation plan under the Clean Air Act after determining that the plan met basic transportation needs in the area, according to the U.S. Court of Appeals for the Second Circuit (*Council of Commuter Organizations v. Thomas*, No. 85-4128).

In June 1985, EPA approved revisions to New York's implementation plan that would achieve reductions in emissions and motor vehicle use, according to the appeals court. The revisions do not require the state to upgrade the mass transit system to make up for the increase in riders resulting from reduced motor vehicle use, the appeals court said.

Background of Suit

The August ruling came in response to the second round of suits filed by citizen groups against EPA and New York challenging the state's unwillingness to commit to improvements in the city's mass transit system.

In 1982, the Second Circuit upheld the agency's approval of a mass transit plan for the city set up in a 1979 revision to the state plan, but the court denounced the agency for delaying its action on the 1979 proposal. Because the state was about to propose further revisions affecting mass transit, the court conditioned EPA approval on a finding that New York's newest proposal met "basic transportation needs" (*Council of Commuter Organizations v. Gorsuch*, 17 ERC 1897; Current Developments, July 9, 1982, p. 354).

In challenging EPA's approval of the 1982 revision, the groups raised the issue of whether basic transportation needs can be met by "only providing the level of transit service sufficient to sustain mobility of riders diverted from automobiles by transportation control measures," the appeals court said.

Court Terms Act 'Ambiguous'

Although the court claimed to be "surprised" by the agency's finding that commuter mobility could be maintained without mass transit improvements, the Second Circuit determined that EPA's conclusion could be upheld in light of the "ambiguous" language of the Air Act.

The terms "basic transportation needs" are not defined in the Act, the court observed, and the terms did not appear to have a special meaning in either the environmental or transportation fields. EPA developed its own interpretation of the Act, which allowed an area to meet basic transportation needs by maintaining sufficient mass transit to offset reductions in motor vehicles, according to the court.

If the court were reviewing a statute primarily addressing transportation concerns, EPA's view of the statute would