

US EPA ARCHIVE DOCUMENT

**Proceedings of the Environmental Protection Agency
PUBLIC MEETING ON WASTE LEACHING
Session V - Leaching Policy and Applications and Wrap-Up**

Summary of Meeting Results

Dave Friedman, EPA/ORD, presented a brief summary of the overall results of the meeting. He noted that everyone agrees that the system needs to be fixed to improve waste characterization. He said that there are two ways that wastes are escaping the system: those that are not adequately handled, and those escaping control.

Mr. Friedman said that in order to adequately support risk assessment, EPA must deal with the fact that the models are not as site-specific as they should be and that the tests that are now used were not developed for site-specific risk assessments.

In terms of quality control, Mr. Friedman said that the questions are whether the quality checks are adequately ensuring that waste was treated properly, and is that treatment effective. He said that everyone agreed that a single point pH test would be appropriate. He noted the call for a tiered approach to testing, with a first level screening that is very aggressive, followed by a second level to characterize waste (modify TCLP by adding pH considerations). He indicated the need to look at long term stability, and the chemical and physical nature of the waste. The participants supported the use of models rather than doing everything in the laboratory.

Mr. Friedman wondered what constitutes adequate protection, and pointed to drinking water standards and a multi-media approach (including air exposure), and noted that storage and handling may pose a greater risk now than in the 1970s.

He felt that the meeting pointed out that the current approach to waste characterization is too aggressive in some cases and not aggressive enough in others (false negatives) and that real question was how much might be released.

In describing the potential concerns about the TCLP, he indicated that pH, especially for metals, seems to be the biggest factor, and that bulk waste can absorb organics. Another concern with the current TCLP is that it only counts those wastes that pass through a glass filter, and there is a question of whether this is accurate. There was a clear call for tests that are fast to perform and inexpensive. He noted that the participants generally supported the use of site-characterization risk assessment models and that where many wastes fall into the same characterization, shared information may reduce cost of testing.

He outlined several approaches to solving test problems, including:

1. Policy issues, .e.g., the need to determine what we are trying to accomplish, and who or what we are trying to protect,
2. Scientific issues,
3. Practicality Issues, and\
4. Other considerations

Greg Helms, EPA/OSW, outlined the next steps that he saw the Agency taking. First, there is a need for a multiple testing approach, in order to make better decisions and to reflect conditions in the field. EPA must disconnect mismanagement from testing procedures and retain simplicity in the testing approach.

Mr. Helms noted that EPA's research efforts must find ways to integrate the research results into the waste characterization process itself. The policy and project planning needs are to establish the risk goals and to incorporate different management scenarios into the process.

Mr. Helms stated that EPA will work with a small group of experts, while maintaining a public process, to assess problems more quickly, but that EPA needed to do the project planning and budget work to obtain the necessary resources.

Mr. Helms concluded his summary by reiterating EPA's position that the TCLP is not doing a bad job, but that it needs validation, verification, and some characterization adjustment.