

Ecology Center Opposes Gelman Science, Inc. Deep Well

by David Stead, Environmental Policy Coordinator

On September 24, 1986 the staff of the Center presented testimony to the U.S. Environmental Protection Agency (USEPA) concerning their intent to issue a Class I Injection Well Permit to Gelman Sciences, Incorporated. The permit was granted on October 24, 1986. Any interested parties have 30 days in which to file for a review of the permit the Office of General Counsel of the USEPA.

The Ecology Center opposes the use of underground injection as a waste disposal option and believes that injection has not been proven to be a long-term solution to hazardous waste disposal. The Center believes that alternative technologies are available which do not pose as great an environmental risk.

Several concerns were raised related to the intent to issue a permit in an area with known groundwater contamination from an unidentified source. The shallow aquifers surrounding the Gelman Sciences,

Inc. facility are contaminated with 1,4-Dioxane. This hazardous material is identified in the permit as a constituent of the waste stream and has been injected into the disposal well for the past five years.

The USEPA has issued a health advisory for 1,4-Dioxane. Health advisories are not legally enforceable standards as they may change depending on the available information. The health advisories are only for one and ten day exposures and do not assess the long term chronic exposure risk. All residents on the east side of Wagner road have been advised to discontinue drinking their well water. The residents are currently using bottled water and the city of Ann Arbor plans to extend municipal water to the affected areas.

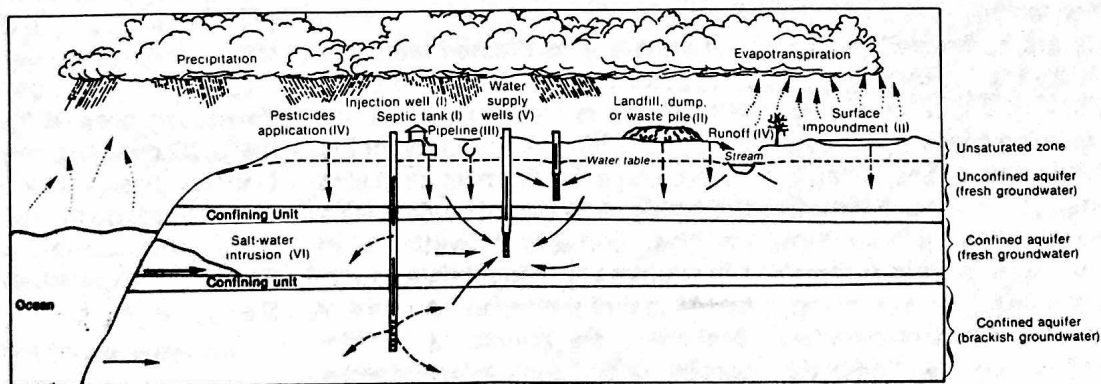
The source of the contamination has not been determined. Although the mechanical integrity of the injection well has been demonstrated, of scientific (Gelman continued on page 5)

The Wrath Of Grapes

By Lise Anderson
Toxics Education Specialist

September 25th Cesar Chavez returned to Ann Arbor to announce the new United Farm Worker (UFW) table grape boycott. The boycott was launched in mid May 1984 to force California grape growers to comply with state health and safety laws. Specifically the farmworkers are demanding that growers notify field workers before spraying their fields with five deadly pesticides: Parathion, Methyl Bromide, Dinoseb, Captan and Phosdrin.

These pesticides (the Ecology Center has information on each) are either known or suspected of causing chronic health effects. Furthermore, according to a World Resources Institute publication, *Field Duty: U.S. Farmworker and Pesticide Safety*, up to 80% of crop duster applied pesticides miss their target and enter the environment in enormous quantities. In their 15 minute film, "The Wrath of Grapes", the UFW documents the increases in cases of cancer and birth defects (Wrath of Grapes continued on page 2)



-----> Movement of groundwater contamination -> Groundwater flow

Credit: Geraghty & Miller, 1983

Pathways of groundwater contamination vary depending on the source. Examples of sources are shown here for each of OTA's six source categories

People at the Center

by Nancy Stone, Staff Coordinator

Keith Taylor has joined the Board of Directors this fall. Author of a book of poetry, *Learning to Dance*, published in 1985 by Falling Water Press, Keith has also contributed natural history and birdwatching articles for the *Ann Arbor Observer* and *Ann Arbor Magazine*.

Keith taught English at Central Michigan University and moved to Ann Arbor seven years ago with his wife. They have stayed on with an ever-growing appreciation for the community and environment of Ann Arbor. Keith can often be found among the aisles of Borders Book Shop, where he edits the book review magazine.

Keith replaces LeRoy Cappaert on the board. LeRoy requested an early leave in order to allow time for his new position with the superintendent of the Ann Arbor Schools system to coordinate the school redistricting implementation.

Sean Milner, an active volunteer in the Recycle Ann Arbor program, has joined the staff as a half-time baler. Sean's interests include football and wilderness Outward Bound camping. We hope that tossing newspapers will help keep his throwing arm in shape and know that his lively good-natured humor is keeping the rest of us mentally fit.

Our interim newsletter editor, Victor Bullen, has accepted a job with World Wildlife Fund in Washington, D.C., and Brazil to manage a project to preserve bio-diversity in the tropical rainforests.

Jim Frey, staff member for seven years, has started his own Ann Arbor-based recycling consulting company, Resource Recycling Systems, with Kerry Sandford. Jim is preparing a composting feasibility study for Washtenaw County. Even though Jim is working on his MBA from the University of Michigan, he continues to co-chair the Center's Committee on Resources. ◇

(Gelman from page 1)

evidence which indicates possible long term, adverse effects from the injection of nonhazardous and hazardous materials into deep aquifers. There is no procedure that can absolutely demonstrate that upward fluid migration of injected materials has not occurred up the outside of the well casing or through geologic fractures or fissures.

The nonhazardous determination was based on the rationale that 1,4-Dioxane is a process material and not a discarded commercial chemical product. The determination relieves Gelman Sciences, Inc. from any regulatory requirements under the Resource Conservation and Recovery Act (RCRA). Furthermore, the determination relieves the USEPA from any responsibility to oversee the management of hazardous materials or constituents prior to injection.

The USEPA Office of Drinking Water has issued an Interim Guidance which states:

1. A hazardous waste injection well must be authorized by both the Resource Conservation and Recovery Act (RCRA) and the Safe Drinking Water Act (SDWA); and
2. An Underground Injection Control permit issued after November 8, 1984 is a RCRA permit-by-rule only when corrective action requirements for all Solid Waste Management Units are satisfied.

The Guidance further states that, as a general rule, UIC permits should

not be issued until a Preliminary Assessment and (if necessary) a Site Investigation has been completed, or a finding has been made that corrective action is not necessary. At a minimum, the USEPA should have conducted a Preliminary Assessment and Site Investigation prior to the issuance of the permit.

The remedial action plan for the removal of the contaminants from the shallow aquifers has not been made available to the public. The remedial action plan should have been completed prior to the issuance of the permit, given the number of unknown facts concerning the groundwater contamination and the actions necessary to remedy the problem.

As a final note, the USEPA did not require Gelman Sciences to conduct a thorough investigation of alternative technologies for source reduction or onsite treatment. The intent of the Resource Conservation and Recovery Act of 1984 is to move toward the use of innovative technologies for source reduction and permanent treatment.

The Center staff and the Board of Directors will continue to oppose the deep well permit and will closely monitor the cleanup and the disposal of the contaminated groundwater as a remedial action, and the possible use of the municipal sewage treatment facility for the disposal of waste from Gelman Sciences. ◇

Board Nominations Sought

Nominations for a limited number of openings for the Ecology Center Board of Directors are being sought. A candidate should be able to contribute a minimum of ten hours a month to board meetings and task force works in organizational policy development, fundraising, or environmental program development. Terms are for three years beginning in January of 1987. Candidates may nominate themselves. All nominations will be considered by the Nominations Committee, c/o The Ecology Center, 417 Detroit St., Ann Arbor, MI 48104. Please direct any questions to Nancy Stone, Staff Coordinator, at 761-3186.

Ballots will be prepared by the Nominating Committee and sent to the membership in December and tallied at the annual meeting scheduled for January, 1987. The Center's bylaws also give members the option of submitting a nomination petition signed by five Ecology Center members to place a nomination directly on the ballot. ◇