

ENVIRONMENTAL CONSULTING GROUP

St.Germain ■ Collins

# Dioxin Soil Cleanup Case Study: A Mix of Conventional Field and New Laboratory Techniques

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# Introduction

## Topics to Be Covered Today

- Utility Pole Contamination
- Soil Sampling Methods
- Dioxin Testing
- How to Fix a “Broken” Field Investigation
- Cost Considerations

# Utility Pole Contamination

## Utility poles treated to prevent decay

- Creosote
- Chromated Copper Arsenate (CCA)
- Pentachlorophenol (usually a diesel fuel solution) “Penta”
- Contaminants of concern PAHs, CCA metals, Penta
- (And Dioxin)

# Pentachlorophenol

- Penta still used as utility pole preservative today.
- 36 million poles with Penta preservative in use in the US.



# Dioxins

- Dioxin is an unavoidable byproduct of Penta manufacturing.
- EPA says 2,3,7,8-TCDD (most toxic dioxin) must be less than 1 ppb in Penta.
- Dioxin typically regulated using the Toxicity Equivalence Factor (TEF) approach.
- Summing the TEF-adjusted concentrations of detected dioxins gives Toxicity Equivalent (TEQ) value.

# Dioxins

- Dioxin cleanup standards vary widely.
- Most based on future land use scenarios.
- Standards below are not completely comparable (land uses vary).

## DIOXIN TEQ CLEANUP STANDARDS (NG/KG)

	ME	NH	VT	MA
“Residential”	10	1,000	4.5	20
“Industrial”	31	5,000	18	300

**ng/kg (ppt) levels make cross-contamination a serious field concern**

# Site Description

- Utility pole storage site in northern New England since 1984.
- Two areas of storage:
  - Pole Yard
  - Stub Yard (broken poles)
- Both on bare soil.
- Thin fill soil on top of irregular bedrock surface.

# Site Layout

Pole Yard with Cribs





# Previous Work (by others)

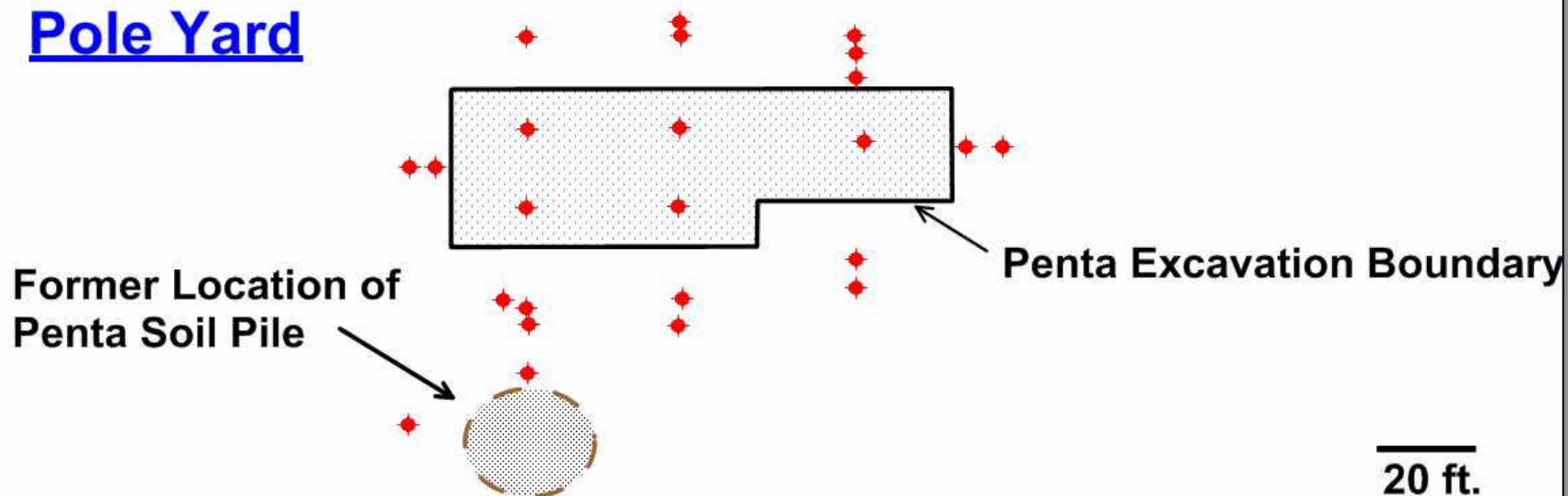
- Sampling initially focused on Penta, PAHs, CCA—Penta became primary COC.
- 200 tons of Penta-contaminated soil removed (*stored on-site*) with clean confirmatory samples.
- So far, so good—Penta distribution made sense, easy to remove. But...
- Dioxin testing at request of State (oh-oh!).

# Previous Work (by others)

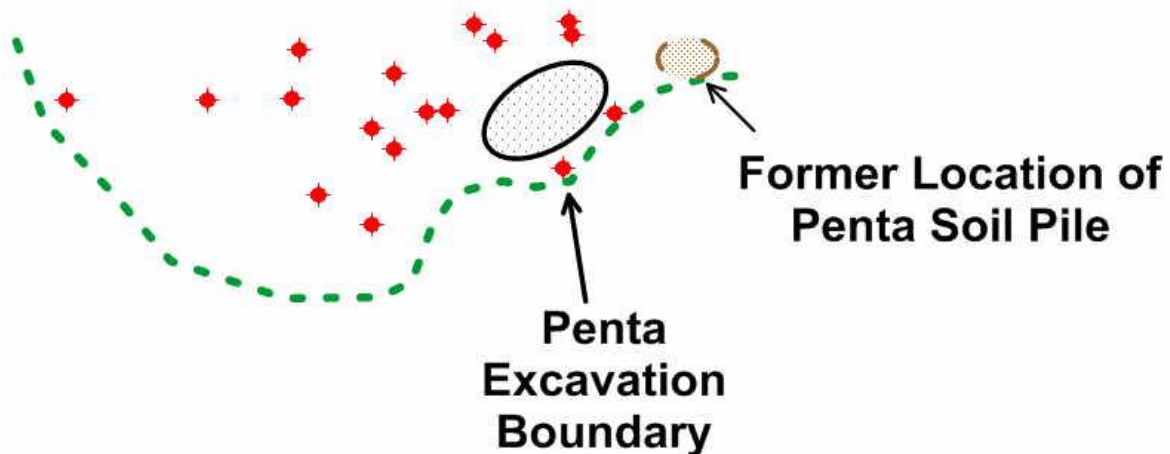
- 34 borings and 66 samples for dioxin later...  
(Lab costs alone in the \$35,000-\$60,000 range using EPA Method 8290)
- Widespread exceedences of Residential standard (4.5 ng/kg).
- Extent of dioxin contamination still unclear because of:
  - No control for sample locations, often irregular.
  - Sample depth intervals inconsistent.
  - Cross contamination in the field.

# DIOXIN SAMPLE LOCATIONS (BY OTHERS)

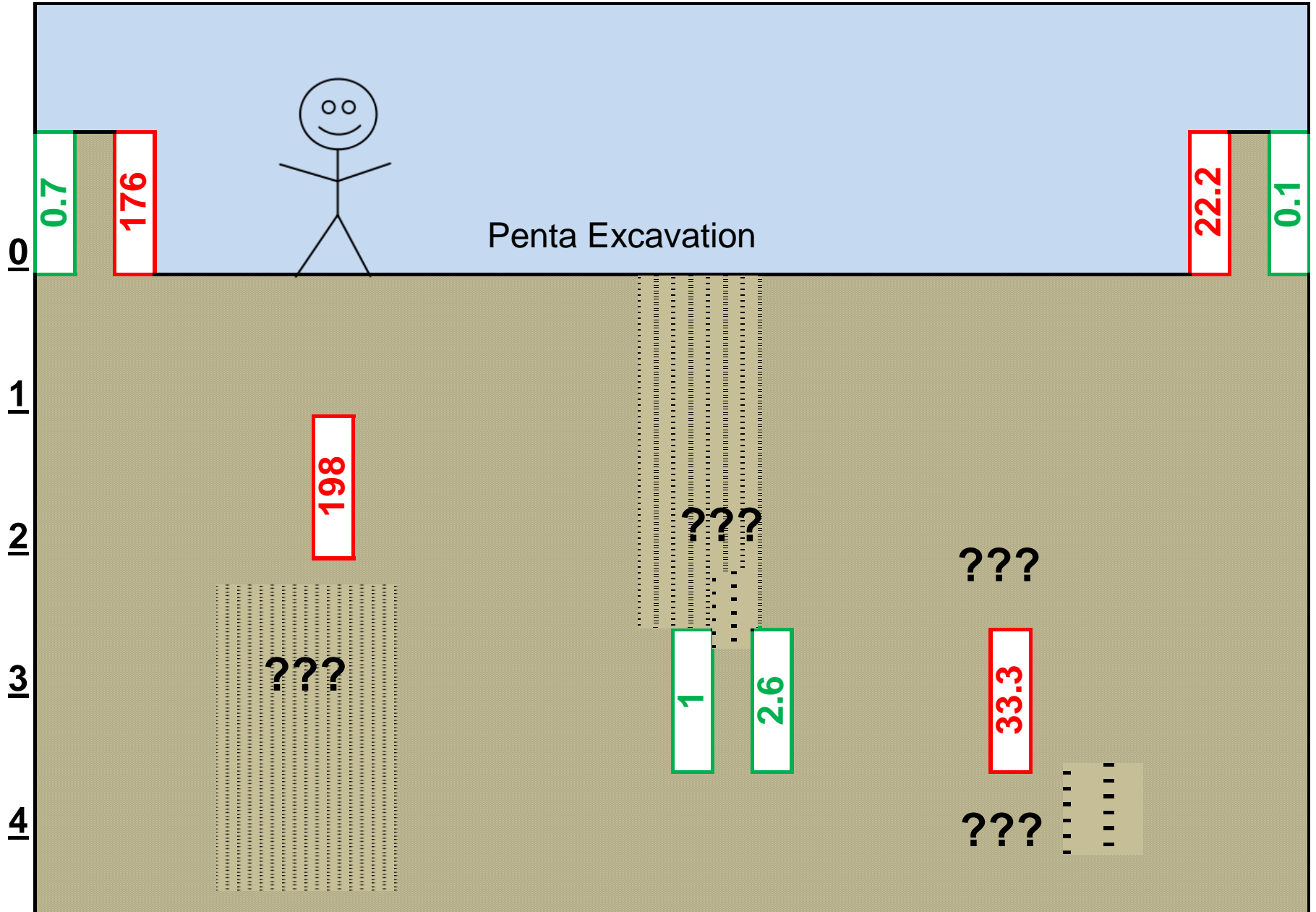
## Pole Yard



## Stub Yard



# Schematic Cross Section



# Previous Work (by others)



DUST WITH  
DIOXIN

**Soil Pile from Penta Excavation**

# Previous Work (by others)

Do the math--

Overbudget

Project Delays

+ Dioxin Extent Unclear

**Unhappy Client**  $\Rightarrow$  New Consultant

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# Our Sampling

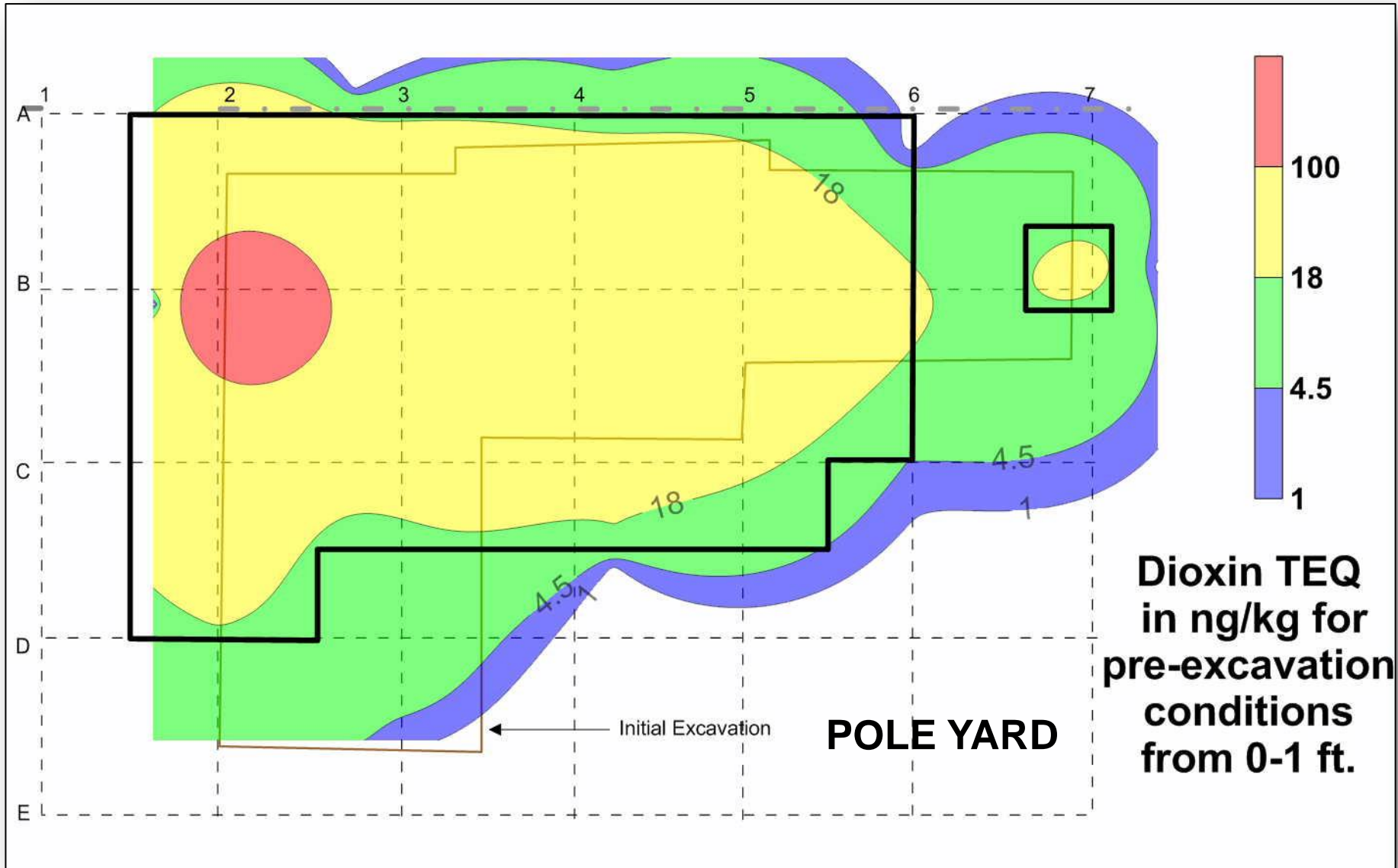
- Past iterative approach for characterization too costly, time-consuming.
- 20' grid tied into structures. Limited borings filled in gaps for characterization.
- Specific depth intervals, separate boreholes to minimize cross-contamination.
- 35 samples analyzed using EPA 4025M, 5 dups using EPA 8290.
- More on cost savings later.

# Data Analysis

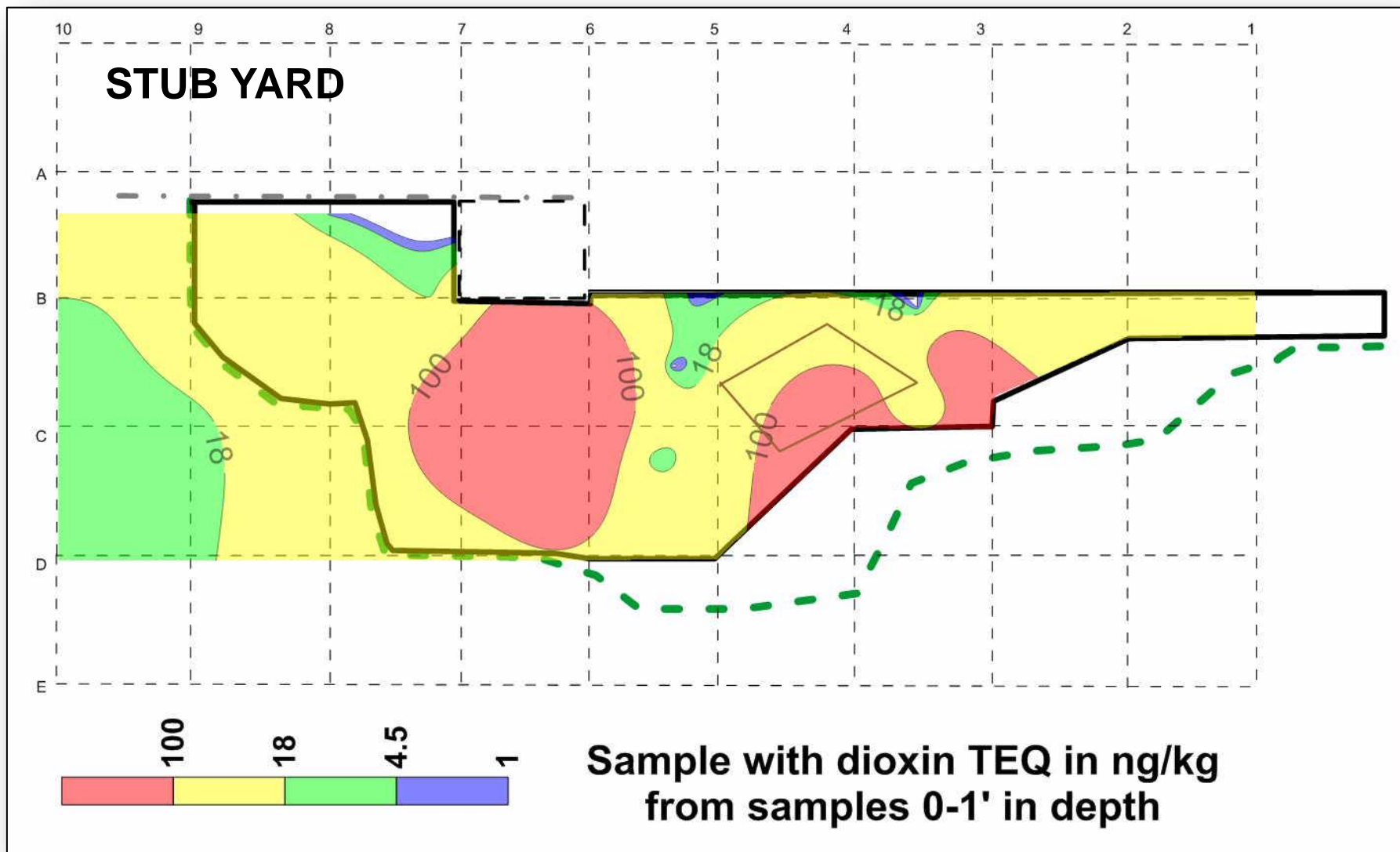
- Contoured surface dioxin levels using Surfer for a visual understanding of its distribution.
- Used grids to select excavation boundaries, depths, and estimate volumes.
- **Did not worry about exact location of cleanup threshold boundary since confirmatory sampling would be completed.**



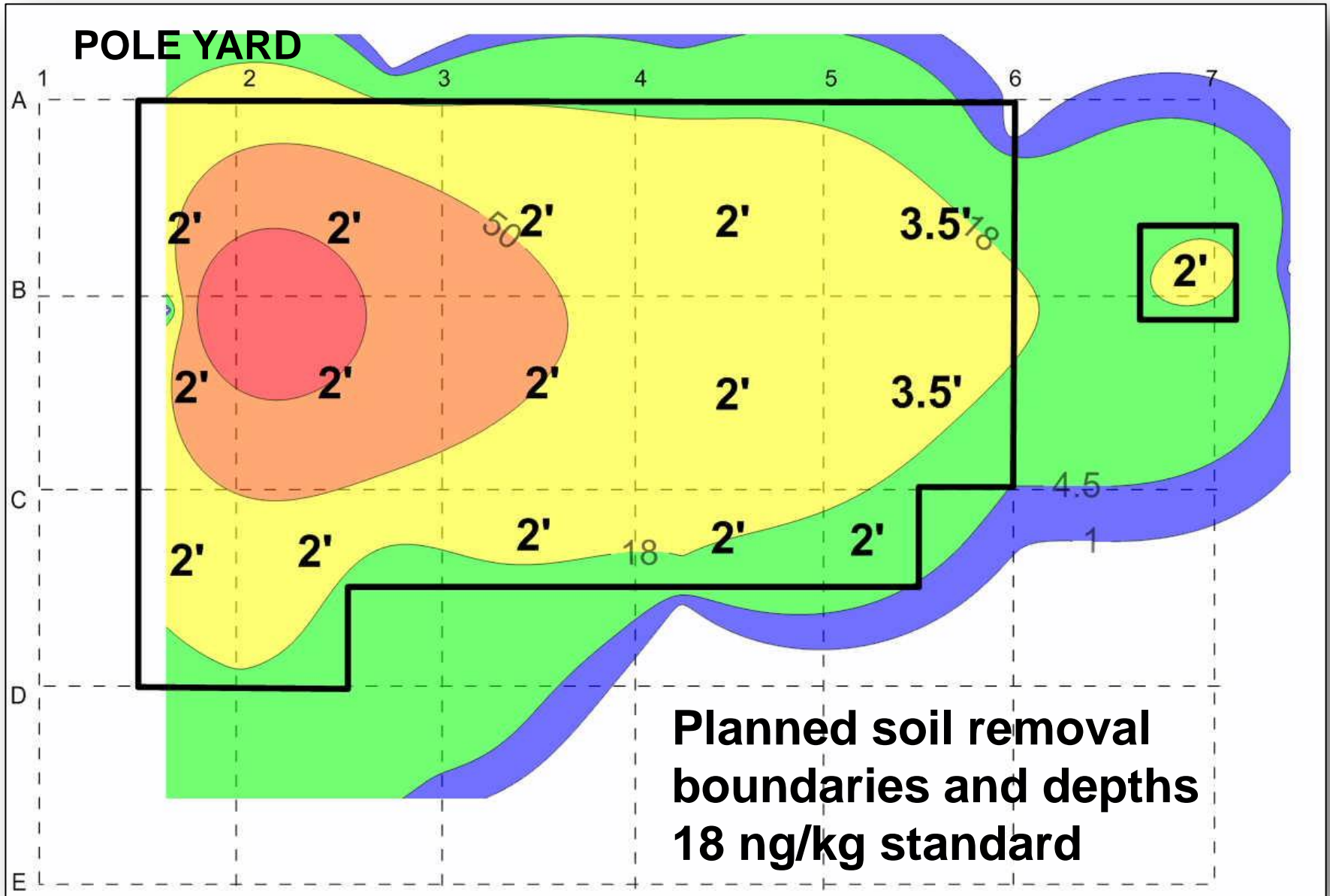
# Results



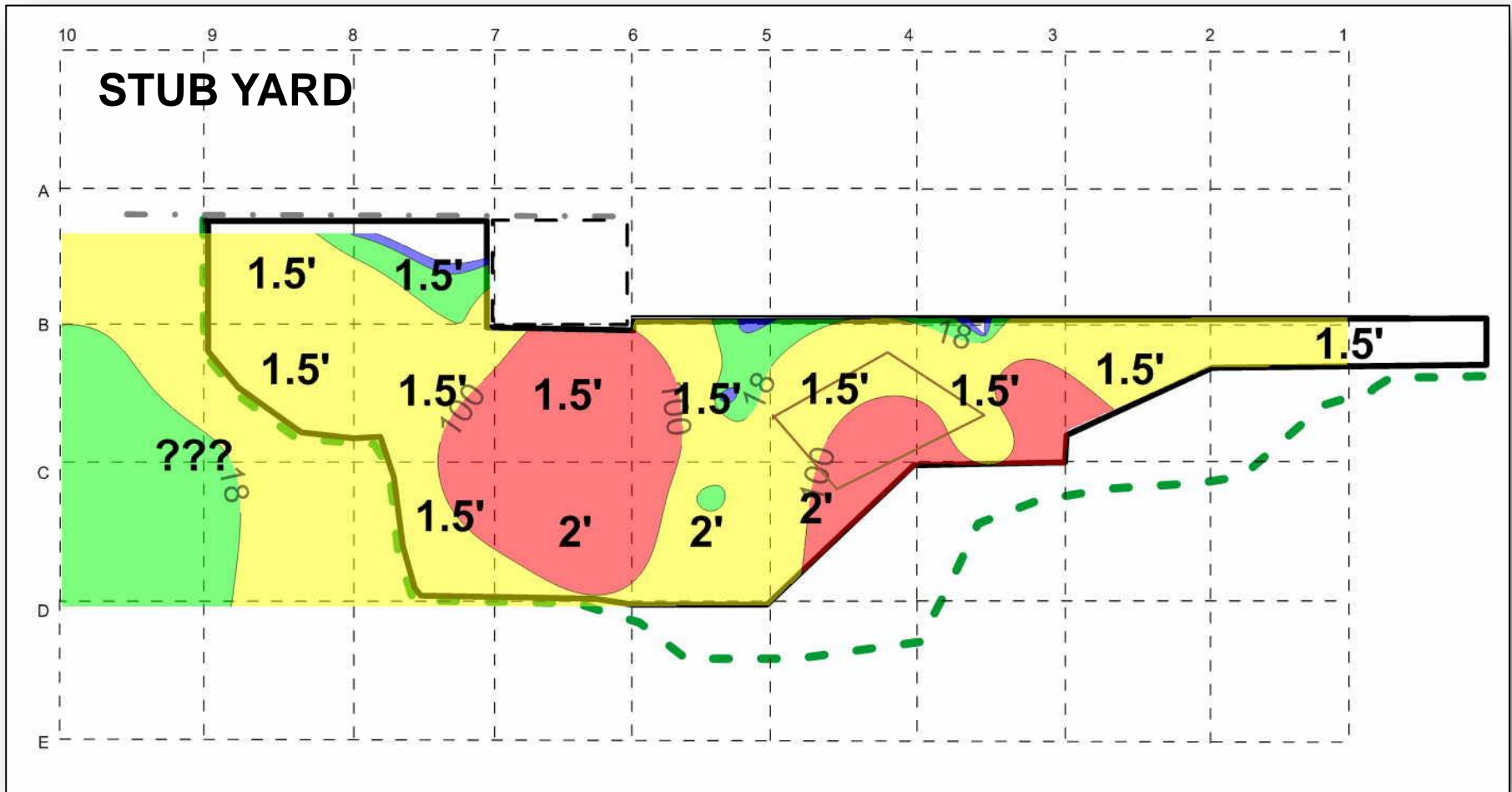
# Results



# Remediation Depths



# Remediation

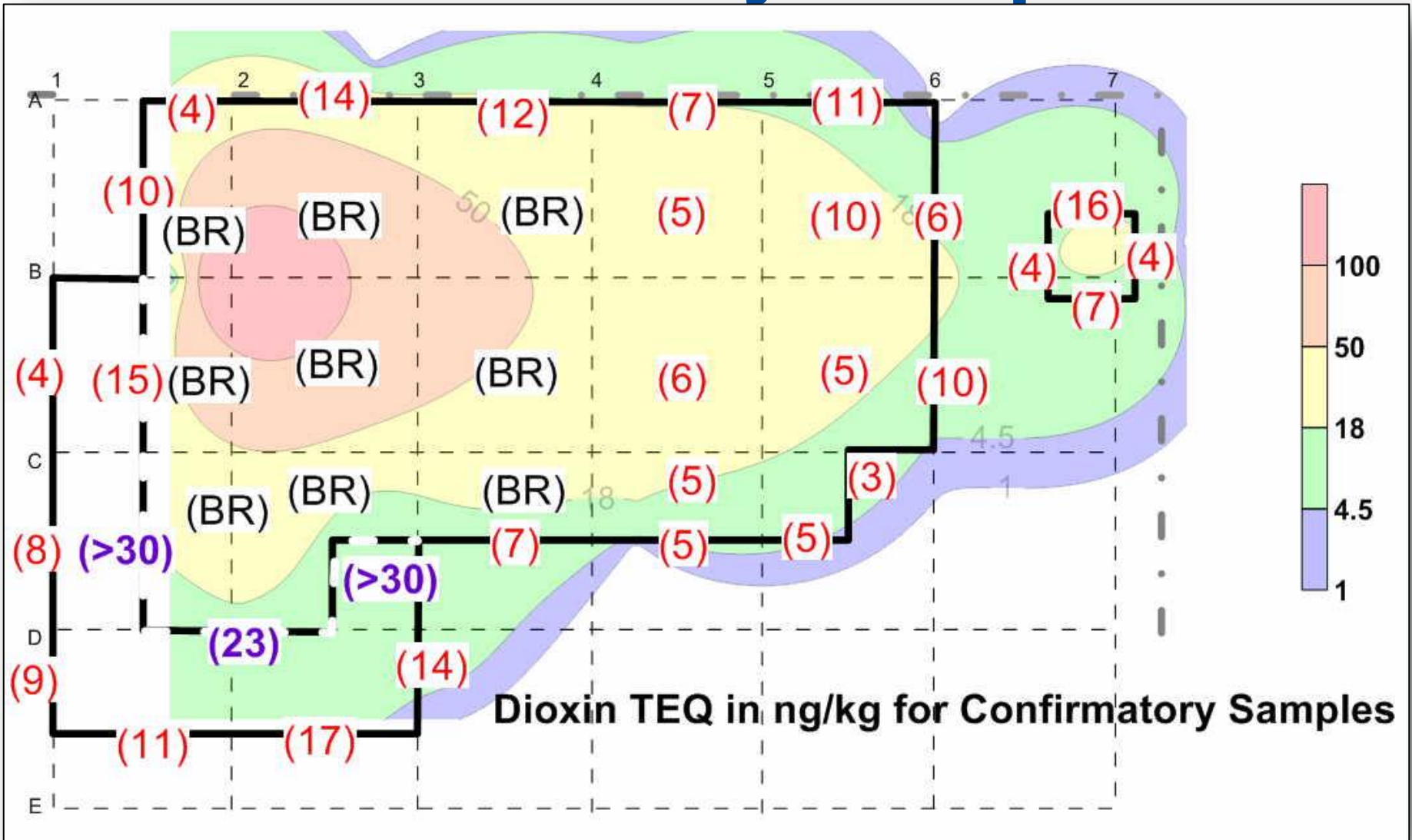


**Planned soil removal boundaries  
and depths 18 ng/kg standard**

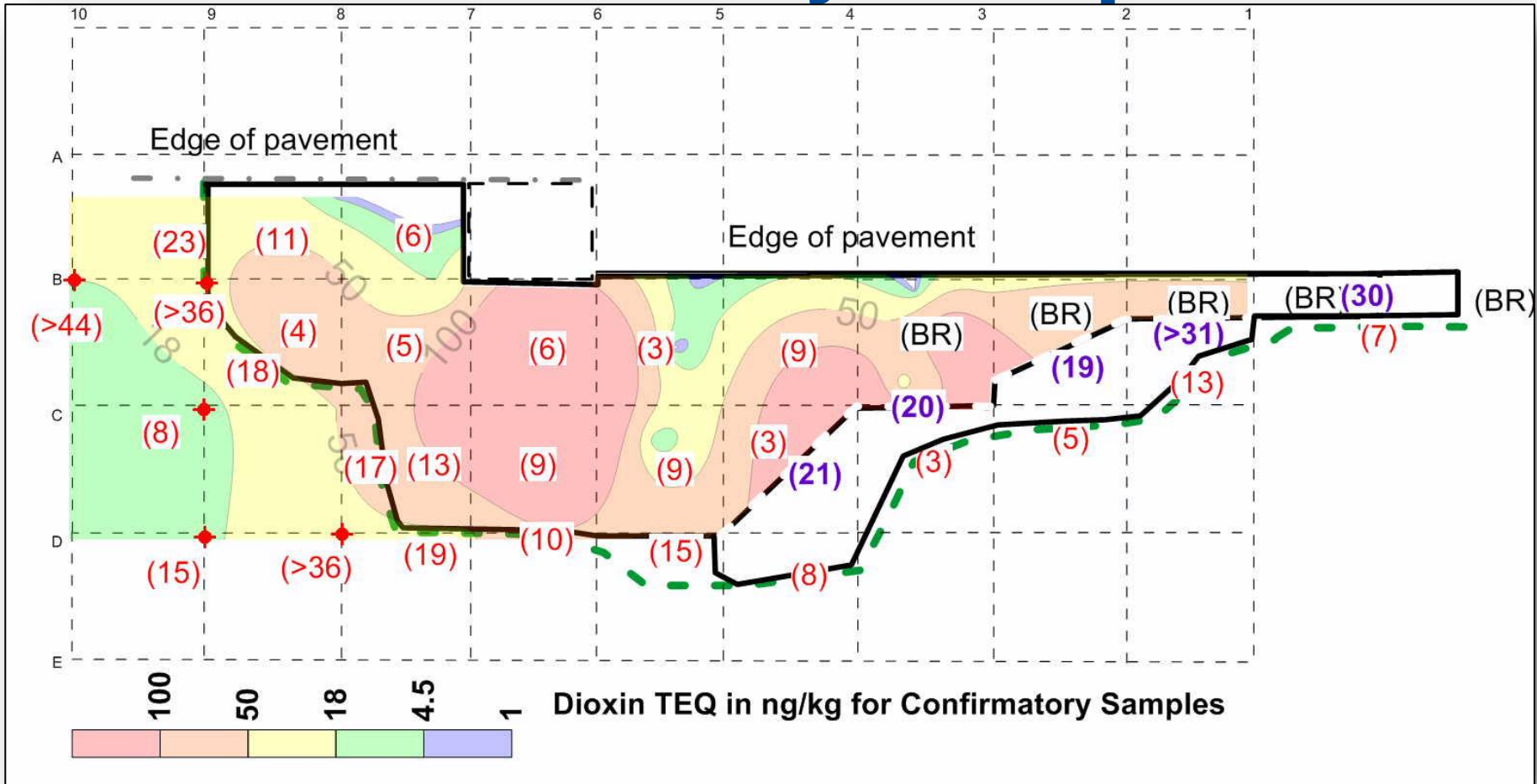
# Remediation

- Industrial Standard (18 ng/kg) selected because 4.5 ng/kg would have significantly increased soil volume.
- Estimated 2,286 tons, 2,108 tons actual.
- Confirmatory sampling consisted of 3 to 5-grab composites for each 20' x 20' grid—62 samples in total.
- Both sidewalls and bottom sampled.
- Confirmatory sampling showed two areas that required additional excavation

# Confirmatory Samples



# Confirmatory Samples



# Cost Considerations

Lab Method:	8290	8290	4025M
Approach:	Sample More	Dig More	Actual
Add. Site Char.	\$27,000	\$17,000	\$13,000
Remediation & Confirmatory Sampling	\$98,000	\$85,000	\$65,000
Soil Disposal	\$150,000	\$174,000	\$150,000
<b>TOTALS =</b>	<b>\$275,000</b>	<b>\$276,000</b>	<b>\$228,000</b>
<b>COST SAVINGS =</b>			<b>18%</b>



# Conclusions/Lessons

- Get your COCs right the first time.
- If Dioxin is a COC, be careful!
- Establish grid for characterization and confirmatory sampling.
- Consistency in sample depths.
- Explore new analytical methods.