

Geologic Honesty in Environmental Site Characterization

HATHEWAY, A. W., International Consultant in Mitigation, Remediation & Forensics, Past President, AEG (1985), USA

Environmental restoration must be protective of not only the environment, but of people as today's residents and tomorrow's citizens. Today the entire process of environmental restoration is threatened by irresponsible parties who wish to take such fraudulent actions as to make hazardous substance threats appear to disappear.

Fraudulent diminution of hazardous waste threats currently is being carried on through misapplication of the ASTM (American Society of Testing & Materials) standard for Risk-Based Corrective Actions (RBCA). Several methods of these fraudulent actions are now common:

- * Conducting the site and waste characterization so as to be incomplete and not designed with an understanding of the historic circumstances responsible for caches of uncontrolled hazardous wastes;
- * Conducting the site and waste characterization so as not to look in the correct, suspected locations for waste source areas and transported contamination;
- * Inability to detect and define geologic conditions that defeat proper site remediation technologies; these become fatal flaws that may conceal the presence of hazardous wastes, as well as geologic contaminant pathways, and;
- * Use of RBCA for hazardous waste chemical groups for which toxic substances are not amenable to biodegradation; such inapplicable use involves chlorinated solvents and other such compounds, coal-tar PAHs, SVOCs in general, and heavy metals.

Environmental geological practitioners must be the watch-dogs for excellence and quality applied to site and waste characterization and to environmental remediation in general.