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August 28, 1987

Art Gasior - Community Relations Coordinator
U.S.- EPA, Region V
230 S. Dearborn Street
Chicago, Illinois
60602

Subject : Industrial Excess Landfill - Uniontown
Lake Township, Stark County, Ohio

Greetings:

As indicated by your notice and at the meeting last Tuesday, Aug. 25th, please permit me to make some remarks as an environmentalist and a resident of Lake township about conditions concerning this dump and the area referred to as Uniontown Ohio.

First of all Uniontown is a misleading name as it is not incorporated under Ohio law and has no mayor, council or village authorities. This complicates responsibility if this EPA proposal is implemented as the responsibility for handling monies and functioning of the system in the future. It reverts to the Township Trustees and the County Commissioners. But there are three townships and three counties involved and the size of the area depends on who one talks to. Uniontown area is in the corner of Stark County, Summit and Portage Counties here in Ohio. The Concerned Citizens group while being highly vocal I am of the opinion will have no legal responsibility for the future operation of the water system. That is unless they decide to incorporate the area as a town as many other areas have done in Ohio. In Ohio the public water supplies are required to be tested on a regular basis for pollutants and chemicals but here in Uniontown there is no public system and testing has to be done on an individual basis. This, as you well know, gets to be astronomical costwise.

Uniontown area has no public water system nor does it have any unified or public sewer system. This has never been mentioned in any of their news paper, TV or meetings that I have attended. Each residence and the few businesses have their own well and septic system. In the older part of the area I suppose some cess-pools of the pre-automatic washer days exist.

I have long been of the opinion that the people in this area have SOME responsibility for the predicament they are in. Their sewage and human excreta pollutes just the same as other people do. They apparently do not want to incorporate under Ohio laws so they can handle these problems as other groups have done. At one time there was a proposal to sewer the area and plans were even drawn up it was called the "lift 91" plan. The people of the area rejected it. Greentown, which is another unincorporated Community some eight miles South of Uniontown, is on the Stark County Sewer system. This serves such areas to North of Greentown in the Dotwood and Cain Road Area.

Some of these chemicals in use in most everyday house hold^s are pretty dangerous like Drano-Sani-Flush and even oven cleaners. On October 21, 1986 I attended a meeting held in Beldon Village of the Ohio Public Health Association and one of the things discussed was dangerous chemicals used in households. I have forwarded to you a list and a representative of the Council on Hazardous Materials has promised more copies for this occasion. See exhibit No. 1.

The material given us last Tuesday evening particularly the red page on which the concerned Citizens based their claim for free water for an area 3 miles surrounding the dump.

see page 2.

This list interests me . First of all I think the public is due to an explanation of just what it means. It is expressed in parts per million(spelled with M). It refers to an L-D - 50 factor and expressed in grams (or less) per Kg.kilb-grams, better referred to as 1,000 grams,that it took to kill 50% of the test animals it was tried on. A kilo-gram is roughly equal to 2.2 pounds adv. A millogram is one thousandth of a gram and ug is one millionth of a gram or parts permillion . It takes 1,000 1,000 to make a million in U.S.A. When it is expressed in toxicity being in parts per million it is getting in a pretty low range. One item found on and off site interested me. It is phenol. There are many different structures of phenol one showing 140 mg / per kg. of particular note is one , phenol , dinitro shown as S19800005 in RETECs as having an LD- 50 Factor of approx 50 mg to 90 mg/ kg and was marketed as Dow Selective Weed Killer. My information is that this product has now been pulled off the market.

Permit me to tell of an experience I had with a phenol product. Last February 28, in the morning I woke up with this splitting headache and a peculiar odor in the house. On going outside I could smell "lysol" . The wind was still and the ground had been frozen for some time but during the night it warmed up and the frost was going out of the ground. On going near the area where my neighbors leach bed was I could smell this odor strong. In the meantime the wind changed and the house was then ventelated. The headache went away. On checking a Lysol label I find the engredients are: soap, phenylphenol, benzyl-p- chlorophenol, ethyl alchol, xylenols, isopropyl alchol, tetrasodium ethyledi-aminetetracetate. See exhibit No. 2.

Mr. Gasior I wonder about the similar names on the red sheet and just how much is filter-
-ing into this land-fill in the form of leachate. Lysol is a commonly used product and the citizens of the Uniontown area are no different than other people.

When people have their own well and water system I find that it has to be cleaned too. The water holding tank acquires an oily like film of scum on the top of this water that deposits some on the sides of the tank with the up and down draw of the water. It may also become loaded with sulfur, magnesium and other contaminants over the years and just plain needs replaced . The well needs cleaning at times and even the addition of some chlorine. If you have a new well that is now required to have a pitless adapter and drilled outside the residential foundation this can be accomplished by dumping chlorine or soda ash in the well in reasonable quantities. If you have an older home where the well is within the house foundation its more of a problem. In the last case the breather pipe must be vented outside so methane or natural gas that may bubble up in the water well can escape. Gas bubbling up in water wells is not new in this area.

If a residence has a basement it is important that it be ventilated at times as many of the new chemicals including some methanes are heavier than air and "puddle" to lower levels. In my own home we have a complicated system of filters and air circulation. The key is the furnace fan. We have an oil furnace with an add-on electric heat pump and air conditioner. There is an over-riding timer that activates the furnace fan for two one hour periods during the night . It also has an 6 inch pipe bringing some fresh air into the system from the out side that can be controlled in volume and there are two big filters with special foam cores to filter this air as well as an electro-static filter unit above the furnace. This system circulates the air both in the base-
-ment and has controls to compensate for cold weather.

I am of the opinion other people are responsible for efforts to make their water well and home environment as healthy as possible including those living in the Uniontown area.

I must now point out that the Uniontown area not being incorporated is actually under Ohio code law and agriculture , as such, is exempt to all zoning in-so-far as agriculture activities are concerned. Please now refer to Lake Township Zoning regu-
-lations revised Aug. 1, 1985 and to Article 1, Section 102 titled "Agriculture exempted" this is on page 1. See exhibit No. 3.

And specifically I want to call your attention that the Pesticide Department of the

Ohio Department of Agriculture is licensed to control and administer the use of Economic poisons here in Ohio particularly out side of corporation limits of Ohio . Economic poisons are sometimes referred to as pesticides and herbicides and a heap of these substances are without the benefit of a poison label and a herbicide is actually a selective economic poison without a poison label - some lead mixes carry this poison label. 2,4-D is one and I was told at a pesticide symposium last April 12, 1986 that it had never been evaluated for some 30 years. I never observed anyone at Uniontown area using these farm chemicals but all I have to do is look at their weed free lawns. Also people do not live in a swampy area like parts of the Uniontown area without using bug spray. Succinic acid or malathion is one. Another is DDVP (dichloro diethyl vinyl phosphate) with an L D-50 factor of around 40 mg/kg depending what its tested on. It is marketed under such names as Atguard V, dichlorofos and vapona for mosquito foggers. People use these farm chemicals around and in their residences and some are mighty toxic. Even DDT did not carry a poison label and while it is supposed to be banned we were told at the pesticide symposium that it is still present and permitted as a contaminant in things like keltane (2,2,2, trichloroethanol).

Now I must call your attention to a farming area East of the Metzger ditch. This is prime agriculture land and is now known as being in Ohio's corn belt. Back around 1965 less than ten people met at Columbus and decided to spray certain agriculture areas by winged aircraft (helicopters came later) . They used the hard poisons too such as long lasting DDT, dieldren, aldrin, chlordane, heptachlor, benzene hexachloride or BHC to name some. Some authorities in the know estimated that about 35% of the spray reached the target area and the rest coating the surrounding area and people. In 1967 Stark and Cuyahoga counties were added to the list. Phosdrin and parathion could be purchased by almost anyone with the price of \$28 per gallon (75% pure aircraft strength) from the local wholesale seed house called Lethermans. We were coated in my area with these chemicals including the skunky parathion. They really made my lungs sting and burn and at one time only could get relief in my own home from this burn by wearing a carbon filter gas mask . Try to sleep with one of these on . The odor lasted only a short time but the odorless burn lasted sometimes for days. At one time the herbicide 2,4-D was listed in the pesticide handbook as being an engredient in some 300 different mixes. Corn belongs to the grass family and while listed as a herbicide it not only controls broad leaf plants but promotes the growth of corn in weak solutions.

The Uniontown area is no different than our area as they were coated with these un-holy chemicals.

I must now call your attention again to the substance parathion (not malathion) which was one of 9 chemicals developed in this country as a chemical warfare agent. A 14 year old boy by the name of Dale Fickes was killed by parathion while helping a farmer treat his crops with this substance and this happened within the 3 mile area proposed by the Concerned Citizens . This , in my thinking, was a wrongful death just as if this boy had been killed by a bullet or knife yet the County Prosecutor, Concerned Citizens group or anyone, else to my knowledge, done anything about it. I am enclosing a copy of his certificate of Death - see exhibit No. 4.

I note from the red sheet that trichloroethane is found in samples. This is what the T stands for in D D T better known as dichloro-diphenyl- trichloroethane. Another substance mentioned is magnesium. This depends on what form its in. As a metal it is light and strong. As piles of metal borings laced with cutting oil with a sulfur content of from 4% to 14% and these start to fuse (smoulder) they put out highly toxic fumes as I found out when my lungs were wrecked. As a fertilizer it is a secondary plant nutrient. As in iron and steel melting such as dolomite it takes impurities out of the melted metal. It is necessary to promote cell multiplication in both plant and humans. As in Epsom Salts it is alaxative but beneficial in small quantities. Zinc is another mentioned . As a trace element it is necessary to humans as it promotes the health of the prostate gland in the body. As in galvanising and burning the fumes are poisonous to the body. This is particularly when burning zinc in a fireplace to clean the soot out of the chimney.

see page 4.

I will have to learn more about barrel testing methods before commenting on this.

Before leaving this subject I must now point out the dangers of these substances such as a big class of these agriculture chemicals. These substances are designed to give their product more wallop and be what is known as systemic, as Systemic poisons. They do this by adding an adjuvant or wetting agent that carries relative inert substances through the tissues of the plant directly into the sap tissues. Good examples of adjuvants are DMSO and ethylene oxide. They have three properties. One is they are a good automobile anti-freeze, another is they are a powerful anti-biotic and the third is they are capable of permeating even metals. When people are around these chemicals they breathe and handle them the chemical will go through the protective coating of skin and lungs without ever a break in the skin directly into the blood stream. A person will get additional effects of the "systemic wallop" just like the plant does.

DIOXIN

Dioxin comes in some 70 types and some are relatively easy to make. In the liquid form it was in 2,4,5-T weed killer as TCDD. Arochlors made by Monsanto and Kanechlors made in Japan are other examples. I claim it is odorless as well as other people do.

Sublimation or sunlight is one way to destroy it but this takes time. I am of the opinion that was easy to make by trash burns in the open burning of trash in bbls. At one time this was the order of the day here in Stark County and Ohio as most every home had a trash barrel to burn in until Ohio EPA put a ban on this practice. Burning creosote railroad ties is another place and if one really wanted to get nasty he would sauce up his burning trash with creosote when his neighbor was down wind of it. However, I must now refer to the one major source of dioxins here in N. E. Ohio that were air-borne.

This was the 13 acre site of the Summit National Disposal at the corner of U.S. 225 and U.S. 224 at Deerfield Ohio. This was the tipple area of the old Peterson coal strip mine and having no spoil banks to cover their accepted trash they burned it in a home-made burning affair. I am taking the liberty of enclosing a list of materials there and supplied by the Portage County Prosecutor plus three additions listed in the Cleveland Plain Dealer of April 8, 1977- You will note this includes some 4500 gallons of the intermediate substance referred to as C-56. The other dumps in these spoils were the Manfredi and Jones Toxic Waste dump on the East side plus the big one the Carnation dump on the Westside of U.S. 225. I never considered the Industrial Excess Landfill to be as toxic overall as the Summit National Disposal. When EPA started to put the heat on toxic dumps the other three dumps immediately bull-dozed dirt over their barrels. This dirt was from spoil banks. Summit National had none so they kept on burning materials still stop by by EPA office out of Akron, Ohio.

Referring to your Superfund up-date of April 13, 1987 and to the explanation of ppb. My information there was no equipment in common use till a short time ago to even test for such small quantities. I neglected to show this and it is expressed ng or nanograms and 1,000 million make one billion. I remember about vinyl chloride being used as a propellant for aerosol cans such as hot plate de-greasers and hair spray mixes as it cost at that time some 11¢ per pound.

In conclusion I am definitely not in favor of supplying free water and facilities for a 3 mile radius of this dump that the Concerned citizens are requesting. Others have to pay for their water and sewer facilities and these people are no better than I am. I still question just how much of this chemical proliferation is coming from the dump and how much is coming from other sources such as sewage and the environment of people that live in the area.

These comments are respectfully submitted and I am,

Signed.

Chester F. Brooks

cc. The Honorable Ralph Regula, The Honorable Scott Oelslager, The Hon. Dave Johnson
- Louise Fabinski

Enclosures: As indicated

Q/b/b/t
9/10/2

Lysol®

BRAND

DISINFECTANT

**DEODORIZES
CLEANS**

**CONCENTRATED
Use It
Every Day!**

ACTIVE INGREDIENTS: SOAP 16.5%, o-PHENYLPHENOL 2.8%, o-BENZYL-p-CHLOROPHENOL 2.7%, ETHYL ALCOHOL 1.8%, XYLENOLS 1.5%, ISOPROPYL ALCOHOL 0.9%, TETRASODIUM ETHYLENEDIAMINE TETRAACETATE 0.7%.

INERT INGREDIENTS: 73.1%.

CAUTION: KEEP OUT OF REACH OF CHILDREN. SEE BACK LABEL FOR ADDITIONAL PRECAUTIONS AND FIRST AID.

EPA Reg. No. 777-10-AA
EPA Est. No. 777-IL 1, 312

LO-1093

(SEE
BOTTOM)

**NET 12 FL. OZ.
(354 ml)**

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Then owned of Fairfield Dump

II SCOPE OF THE PROBLEM

The Company estimates the waste material quantities on its property at this time to be as follows:

			Flash F°	
(?)	"Rubber hexene"	310,000 Gallons	20	325m 117
3400 m ³ /kg	Methyl Ethyl Keytone EL-64750 (Methyl acetone) (2,1,3,4-TANONE)	1,375,000	16	325m 138
500 ppm	Ink - Acetone	143,000	-4	325m 21
(?)	Viscous resins	550,000		
	Acetone/creosote/oil mix	40,000		
	Latexes -	385,000		
	Oils -	203,000		
	Sub Total	3,006,000		

4,500 Gallons
C-56

Chlorinated still bottoms 6,000 Gallons
 Heptachlorocyclopentadiene 4-12250
 Solid Trash 1,927 cu yd

The containment of these materials is reported by Summit to be:

- 340,000 gallons in bulk storage
- 6,000 gallons (chlorinated) in 2-3000 gal tanks
- 2,666,000 gallons in approximately 48,500 drums
- 1,927 cu. yd. in 7,000 drums

The waste containing drums have accumulated during the past 3 years because the demand for Summit's service exceeded its incineration capacity.

PLAIN DATE
 April 8 1977
 Thimet - TD-94500 - LD-50 - 1 mg/Kg
 Cytrilane - JP-10500 LD-50 - 4 mg/Kg
 Mirex PC-82250

Appellee's
 Exhibit
 2