

Ashizawa, Annette (ATSDR/DTEM/ATB)

From: Vandonsel.Terese@epamail.epa.gov
Sent: Wednesday, November 01, 2006 1:26 PM
To: Ashizawa, Annette (ATSDR/DTEM/ATB)
Subject: Comments on "Public Health Implications of Hazardous Waste Sites in the 26 US. Great Lakes Areas of Concern (AOC)"

Attachments: Microsoft Word - IJC Report Comments.pdf.zip



Microsoft Word -
IJC Report Co...

Hello Dr. Ashizawa,

Attached, please find a pdf file with my comments on the draft AOC report. I hope that you find them useful. If you have any questions, please let me know.

A signed copy of the comments has been placed in the mail.

(See attached file: Microsoft Word - IJC Report Comments.pdf.zip)

Sincerely,

Terese A. Van Donsel
Remedial Project Manager
Superfund Division
U.S. EPA Region 5
(312) 353-6564

November 1, 2006

SR-6J

Dr. Annette Ashizawa
Centers for Disease Control and Prevention
Division of Toxicology and Environmental Medicine
Agency for Toxic Substances and Disease Registry (F-32)
1600 Clifton Rd.
Atlanta, GA 30333

RE: Comments on the October 2006 draft “Public Health Implications of Hazardous Waste Sites in the 26 U.S. Great Lakes Areas of Concern (AOC)”

Dear Dr. Ashizawa:

Thank you for the opportunity to review and comment on the October 2006 draft document, “*Public Health Implications of Hazardous Waste Sites in the 26 Great Lakes Areas of Concern (AOC)*”. I reviewed the introductory and summary/conclusion portions of the document, along with any text that dealt with the Ashtabula River AOC and nearby waste sites. I hope that you find the comments helpful.

1. Page xx – Executive Summary

The draft Executive Summary states that the Ashtabula River has been remediated. In fact, dredging is currently on-going. The project is not complete and therefore follow-up sampling to gauge post-cleanup levels of residual contamination has not yet been implemented. Contact Scott Cieniawski in GLNPO at 312-353-9184 for additional information.

2. Pages 63 - 64, Section 3.3.1.1

It is not clear that there is a definitive connection between the Big D Campground and the Ashtabula River AOC. The mere presence of a Superfund site in the general area of an AOC does not automatically mean that contaminants have impacted the AOC. Is there data to show that contamination has impacted a nearby stream that flows into the Ashtabula River?

3. Pages 64-65, Section 3.3.1.2

A clarification is needed. Although it is located on Field Brook, the Reactive Metals Incorporated facility (referred to as RMI Extrusion by U.S. EPA) is not being addressed as part of the Fields Brook site. The RMI Extrusion facility is being

addressed through DOE actions coordinated through the Ohio Department of Health Bureau of Radiation Protection and state and federal RCRA programs. The public health assessment for the RMI Extrusion facility dealt with contaminants that differ from those found in Fields Brook. The RMI Extrusion facility has regulated radionuclides that are different from the TE-NORM radionuclides that were dealt with in the Fields Brook cleanup. In addition, the profile of organic and inorganic contamination found on the RMI Extrusion facility differs from what is found in the Fields Brook site. For additional information, please follow the links found at: <http://www.ashtabula.doe.gov/rhtframe.htm>.

Health concerns from exposure to contaminants in Fields Brook were primarily related to PCBs and hexachlorobenzene. In fact, a significant amount of dense non-aqueous phase liquid (DNAPL) was encountered during the excavation of brook sediment and floodplain soil in 2000 and 2001. Excavation was completed in December 2002, with demobilization and closure of the landfill in 2003. At completion, 53,094 cubic yards of contaminated sediment and floodplain soil were excavated from Fields Brook. For additional information concerning work completed in Fields Brook and at the associated source control sites, please see the 2004 Five-Year Review of the Fields Brook site at http://www.epa.gov/region5/superfund/fiveyear/reviews_pdf/ohio/fields_brook.pdf or contact me (Terese Van Donsel, the project manager for the Fields Brook Site) at 312-353-6564.

Follow-up monitoring of the brook (2005, 2006) has identified small pockets of DNAPL and areas of elevated PCBs in the industrial portion of the brook. EPA and the potentially responsible parties (PRPs) are evaluating whether this is material that was missed during the cleanup or a sign that there is continued contaminant loading into the brook. Once it is determined whether there is a continuing contribution to the brook, impacted material will be excavated.

The text notes that several industrial facilities are potentially recontaminating Fields Brook sediment. It is not clear whether this is a reference to the original six source control areas (Acme Scrap Iron and Metal, the North and South Sewers, RMI Metals, Millennium TiCl₄ facility, Conrail Bridge Area, and the Detrex Corporation) that were addressed as part of the cleanup (to prevent recontamination) or a generic reference to a potential source(s) of the contamination found in recent O&M sampling. Note that EPA has not yet determined whether the excess contamination found during recent O&M sampling is material that was missed during the cleanup or new material contributed to the brook. The report should not jump to a conclusion that has not yet been proven.

4. Pages 65-66, Section 3.3.1.3

The text states, *"In addition, soil and the boiler house where the oil was burned were highly contaminated, and contaminants may have an impact on the local creek."* Later text notes that the site *"probably contributed to the environmental burden of the*

IJC critical pollutants PCBs, 2,3,7,8-TCDD, lead, and mercury.” Has there been sampling in the nearby creek to show that the Laskin Poplar Oil facility has impacted surface water? From the NPL summary on the EPA Region 5 web page, it’s not clear that this conclusion has been drawn. Without a connection to contamination in the nearby surface water, is it fair to say that the site has impacted the AOC?

5. Page 66-67, Section 3.3.1.4

The text states that sediment near the New Lyme Landfill is contaminated. However, the surface water body is not identified. The U.S. EPA Region 5 web site states that, “*The site lies entirely within the Lebanon Creek Watershed. The northern portion of the site drains directly into Lebanon Creek. The remainder of the site drains southward to an unnamed tributary of Lebanon Creek. Lebanon Creek drains into Rock Creek...*” Is there sufficient information to document that this contamination has impacted the AOC? The site is 20 miles to the south of the Ashtabula.

6. Page 68, Section 3.3.5.1

Excavation in Fields Brook addressed PCBs, hexachlorobenzene (a primary constituent of the DNAPL) and low-level radionuclides. Recent O&M monitoring has found small pockets of DNAPL in the industrial portion of the brook and an area of elevated PCBs in the industrial portion of the brook. Investigations are on-going to determine whether these issues are the result of material not addressed during the prior site cleanup or new material that has been contributed to the brook.

A large mass of DNAPL is present below the Detrex Corporation facility. An extraction system is in place to remove DNAPL, but the system will need to operate for a long time since the volume of DNAPL is so large. The extraction system will be expanded to speed the removal of product. In addition, to ensure that there is not subsurface movement of DNAPL south to Fields Brook, Detrex will be installing an interceptor trench between its facility and Fields Brook in late 2006.

7. Page 69, Section 3.3.5.4

Why is the percentage of unmarried mothers considered to be a health status indicator that could be compared to contamination within an AOC? While that population may be more vulnerable due to financial considerations, how would this tie in with looking at potential health impacts from contamination in the AOC? Financial status and causes thereof are potential confounding factors when one looks at health statistics, but the percentage of unmarried mothers is not the result of contamination within an AOC. By combining the discussion of the percentage of unmarried mothers in with a brief discussion on the rates of breast and colon cancer, it appears that the report is trying to indicate causation.

8. Table 3-3b

Is there a way to indicate which records drive the information in the table. For example, what site is considered to be the source of 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN?

9. Table 3-3c

Since it appears that the releases are pulled right from TRI data, it is important that a clear connection to the AOC is established for each facility/data point. A large soil release at a site with a questionable connection to the AOC could lead to a skewed determination that there is a mass of material that could erode and impact surface water. It would also be helpful for the facility to be identified along with the TRI data so that readers could easily understand the source of the identified release.

10. Tables 3-1 through 3-3 and General Comment

From reading the report, one gets the idea that current releases are at least as significant as historical sources. I doubt that this is the case for the Ashtabula AOC. There was significant contamination in Fields Brook, which was the primary source of contamination to the Ashtabula River. The historical contribution of PCBs, VOCs, SVOCs, metals, and radionuclides via Fields Brook likely dwarfs current permitted releases. Even though the old ATSDR health assessment for Fields Brook found an indeterminate risk, the report did not look at the mass of contaminants in the brook and what that meant in terms of loading to the Ashtabula River. I'm not suggesting that some detailed evaluation be done to look at the historical mass of contaminants releases. Rather, I'd like to see a discussion that puts the waste sites, TRI data and NPDES data into perspective. What is really driving the problems within the AOC?

In skimming through other sections of the report, this same flaw appears repeatedly. Current permitted releases may not be ideal, but in most cases on-going contaminant contributions from industry are significantly less of a problem than historical contamination that remains in the watershed. Even if a waste site is remediated, there are residual levels of contamination that are considered allowable and acceptable from a risk perspective. If permitted NPDES discharges are discussed in the document (recognizing that although allowable, they are sources), the report should note that having a site remediated doesn't necessarily remove all contamination that can impact an AOC.

11. Page 375, Section 7.1

The text states "**Ashtabula River AOC:** *The four waste sites in this county that had health hazard categories of 1-3 have been remediated.*"

Actually, the dredging of the Ashtabula River is on-going. In addition, excavation work in Fields Brook was completed in 2002, but follow-up work is necessary to

address pockets of contamination (found during O&M sampling) in the industrial area of the brook. As for the other waste sites, it is not clear for some of them that there is a documented link to AOC contamination.

12. Page 376, Section 7.1 – Typo

“River Raisin AOC: The Consolidated Packaging Corporation requires addition monitoring data for soil and groundwater contamination. No demographic data were reported for this site.” Change “addition” to “additional”.

13. General Comment

In future documents, it would make sense to also discuss residual levels of contamination left in sediments and floodplains at waste sites with documented connections to an AOC. It’s not feasible to excavate or dredge all material that has been impacted by contamination. Risk management decisions have to be made. While a waste site cleanup can be considered complete and the residual risk can be determined to be acceptable, acknowledging the limitations of a cleanup is important.

If you have any questions or concerns regarding the comments or need additional information on the Fields Brook Superfund Site, please don’t hesitate to contact me at 312-353-6564.

Sincerely,

Terese A. Van Donsel
Remedial Project Manager

cc: S. Jaffess
Site File – Fields Brook
Site File – Ashtabula River

Ashizawa, Annette (ATSDR/DTEM/ATB)

From: Fisher.Jacqueline@epamail.epa.gov
Sent: Wednesday, November 01, 2006 6:44 PM
To: Ashizawa, Annette (ATSDR/DTEM/ATB)
Cc: Cowgill.David@epamail.epa.gov; Gulezian.Gary@epamail.epa.gov;
Clark.Milt@epamail.epa.gov; Jones.Brenda@epamail.epa.gov;
Adler.Kevin@epamail.epa.gov; Murray, Ed (ATSDR/DTEM/ATB);
Elster.Mark@epamail.epa.gov
Subject: EPA Comments on ATSDR AOC Report
Attachments: 2006 1031 ATSDR drft AOC implications.doc



2006 1031 ATSDR
drft AOC impli...

Hi Annette -

As you requested, we are e-mailing our comments to you regarding the ATSDR Report on the Public Health Implication of Hazardous Waste Sites in the 26 Areas of Concern. We genuinely appreciate having the opportunity to comment on this report again. However due to the short review time given to us, EPA could not make comprehensive comments on the 400 page report.

Here are our overall comments:

- 1) We would have liked to coordinate with Regions 2 and 3 as well as the Superfund Division in Region V to provide in depth comments on this report
- 2) The Superfund data the report utilizes in many cases is not up to date. We recommend that ATSDR verify the Superfund remedial status of each site with a possible health hazard with EPA project managers in Region's, 2, 3, and 5.
- 3) It is clear ATSDR utilized many of EPAs 2004 comments on the original draft of this report. However, after incorporating these comments, the report content at times contradicts itself. For example, on page 16 of the report ATSDR concludes that the APCO site presents a Public Health Hazard of 2. In the following paragraphs, the report states they as of January 200, the APCO site had not been remediated. The following paragraph then states the site was cleaned up in 2004. These statements are confusing. Also, if the site has been cleaned up, does the site still pose a health hazard to the public or should it be reclassified?
- EPA is concerned that contradiction of facts will be found throughout the whole report and that EPA could not catch all of the factual inaccuracies during our review period of one week.
- 4) ATSDR does a good job identifying the limitations of the data used in the report. EPA strongly recommends that ATSDR also identifies these limitations as a footnote within their tables of elevated rates of morbidity and mortality within each of the AOCs.
- 5) EPA also strongly recommends that ATSDR send this draft of the report to the States and Tribes for their review before it is made public. State AOC RAP coordinators are well suited to review this report and provide detailed technical comments
- 6) Please confirm with Mark Elster of GLNPO to determine if the AOC boundary maps used in this report are up to date. His e-mail address is elster.mark@epa.gov

Below are some more specific comments we received form EPA project managers.

Thank you again for the opportunity to review the report.

Torch Lake AOC Comments:

(See attached file: 2006 1031 ATSDR drft AOC implications.doc)

Grand Calumet AOC

KEVIN
ADLER/R5/USEPA/U
S

Sent by: Kevin
Adler

ada8@cdc.gov

To

Milt Clark/R5/USEPA/US@EPA

cc

10/27/2006 10:41
AM

Subject

"Public Health
Implications....(AOC)" report

Hi:

I received a copy of your draft report for review. I looked at some parts of sections 3 and 5 because I am or was the remedial project manager for some of the Superfund sites listed in the report.

Comments:

5.3.1.1 : p. 243 : The ACS site cleanup action also releases VOCs to the atmosphere in accordance with an air "permit" from the Indiana Dept of Envir. Management (IDEM). Our daily discharge limit is 3 pounds/hr or 15 pounds/day. We have not exceeded those numbers. The discharge is from soil vapor extraction units - we use thermal oxidizers to destroy VOCs extracted.

We completed the second 5 Yr Review for the ACS site in April 2006. I can e-mail a .pdf file with the report to you if you wish.

5.4 : OMC sites: The city of Waukegan is demolishing the "clean" portions of OMC Plant 2, work should be completed by mid-November. EPA completed a remedial investigation report for this operable unit in April 2006. Trespassing in the contaminated portions of the building can not be ruled out (scavengers). PCBs are the main contaminant of concern inside the parts of the building not being demolished by the city. I don't know if I would say that the (harbor) sediments are being actively remediated - we are looking at ways to further clean up Waukegan Harbor right now - perhaps thru a Great Lakes Legacy Act project. The old cleanup level of 50 ppm was inadequate; we've since conducted a risk assessment to show that 0.2-0.25 ppm PCBs is protective (based on fish consumption rate assumptions). We hope to begin further cleanup work by 2008. A fish advisory was placed in the northern harbor by the state earlier this year due to PCB levels in certain fish. The signs are in English, only.

Minor typos:

p 152 and 153 - both in the Public Health Outreach Data paragraphs - Correct spelling is Shelby Township.

p 148 Table 3.8F - POLYCHLORINATED see top line of chemical list.

p 242-3 and elsewhere: the correct name of the ACS site is American Chemical Service, Inc. (no "s" at the end of Service)

Thanks,
ka.

Comments From Fred Luckey Region II EPA

Hi Jacki, Just some quick observations:

- 1) The report appears to be for the most part a data dump based on county boundaries with little or no consideration of what the actual potential exposures are within an AOC. It cannot be presented as an analysis of potential contaminant exposures to AOC populations.
- 2) Chapter 1 makes a statement that seems to imply that they asked EPA for maps of the AOC boundaries but that they were'nt available. Therefore ATSDR included any potential sources within the county that includes the AOC. This does not make sense. Although the AOC maps may have been in the process of being updated, the AOC boundaries for the most part are well known and established. As a result it is unclear if there is any relationship between the sources listed on tables and the AOC populations. For example, for the Eighteenmile Creek AOC, almost all of the sources listed have no relationship to the AOC with most of them being unrelated distant Niagara River AOC sources.
- 3) The attempt to associate AOC health outcomes and CERCLIS waste sites, TRI and NPDES data is oversimplistic. This may be due to the relatively narrow mandate of the ATSDR?? The review seems to neglect the existence of far more numerous state superfund sites, state inactive hazardous waste sites, RCRA sites and a wide range of potential waste sites that are in a grey zone. In addition, I believe that contaminant exposures related to residential and occupational exposures would be much more significant than any potential exposure pathways that might be related to these sites. It is unclear why permitted discharges that are meeting state/federal criteria/standards are being highlighted, exceedences would be an appropriate concern.
- 4) The discussion of the Rochester RAP incorrectly states that it has identified drinking water restrictions. The RAP clearly states that there are no drinking water restrictions anywhere in the RAP. It does identify occasional taste and odor problems due to issues unrelated to contaminants.
- 5) Eighteenmile Creek has perhaps some of the most contaminated water, fish and wildlife and consequently the highest potential threats to any Lake Ontario subsistence anglers. The report write up does not identify these significant potential risks or the sources of these contaminants.
- 6) In the first chapter, where it describes the number of AOCs, should acknowledge that the Oswego RAP has been delisted and that there are no significant exposure concerns.
- 7) The report could be greatly improved by reviewing and incorporating information in RAP reports that provide a more comprehensive picture of human health related concerns and issues.

Jackie Fisher
Environmental Health Coordinator
Great Lakes National Program Office
U.S. EPA
77 W. Jackson Blvd. G17-J
Chicago, IL 60604
Ph. 312-353-1481

Fax 312-3532018
fisher.jacqueline@epa.gov

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

Date: October 31, 2006

Subject: Review and comment upon *Draft Public Health Implications of Hazardous Waste Sites in the Twenty-Six U.S. Great Lakes Areas of Concern*, October, 2006. Prepared by Syracuse Research Corporation for U.S. Department of Health and Human Services.

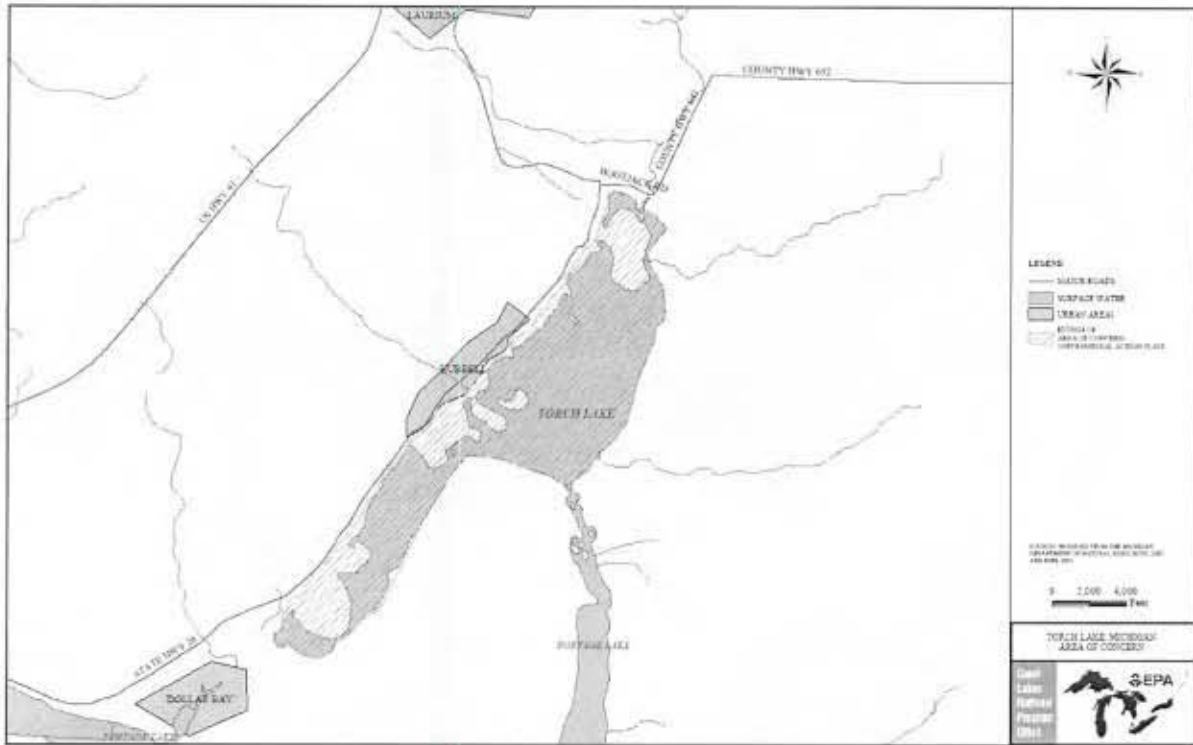
From: Brenda Jones, RPM and Torch Lake AOC Liason

To: Jackie Fisher, Great Lakes National Program Office

Thank you for the opportunity to review *Draft Public Health Implications of Hazardous Waste Sites in the Twenty-Six U.S. Great Lakes Areas of Concern*, October 2006. My comments below are significant in that there are facts in the document that are wrong. They must be corrected prior to finalization of the document. My comments are also limited to the Torch Lake AOC portions of the report.

1. Page xx, 4th paragraph: Torch Lake is not listed as a Lake Superior AOC. Also, if Torch is listed in the next version of the document, please note that the contaminants of concern are not PAH.
2. Section 6.2, first sentence: The description of the AOC is wrong. The description should have been taken from the 1987 RAP document produced by Michigan DEQ. The correct description of the AOC is: *Torch Lake and its immediate environs*. Please replace the entire first sentence of this section with this correct description.
3. Section 6-2, third sentence: the only waste site within the AOC is the western shore of Torch Lake, which constitutes the AOC.
4. Based on comment #2 above, the map of the AOC is incorrect as well. Attached is a correct map of the AOC.
5. Section 6.2.1.1, page 352, Category of Public Health Hazard: MDNR reports that they have not received any reports of fish tumors since 1993. In fact, MDEQ is currently in the process of removing the fish tumor beneficial use impairment (BUI) from the current list of BUIs.
6. Section 6.2.1.1, page 352, Contaminants of Concern..., last two sentences: please revise the last two sentences as follows: *The Superfund remedy consisted of covering almost 800 acres of tailings and slag piles with clean soil and vegetation to stabilize the soil. Superfund declared the site construction complete in September, 2005. More specifically, the approximate 480 acres of the Superfund that lie wholly within the AOC were completed in 2002. This means that all planned remedial activities under the Superfund program are complete.*
7. Section 6.2.1.1, page 352, Public Health Outcome Data: what does being Scandinavian have to do with stomach cancer?

8. Section 6.2.1.1, page 352, Conclusions: replace the last sentence as follows: All remedial activities under Superfund are complete and monitoring indicates that contamination levels are within safety standards.
9. Section 6.2.5.1, last paragraph: replace the middle sentence with *Since 1999, when Superfund remediation began, almost 800 acres of the Torch Lake Superfund site have been remediated. However, only a smaller portion of this, approximately 480 acres, reside within the boundaries of the Torch Lake AOC.*
10. Section 6.2.5.5, page 355: This whole section is incorrect. There are only 3 BUIs for the Torch Lake AOC, they are: Fish Tumors or Other Deformities, Restrictions on Fish Consumption, and Degradation of Benthos. Please revise the section accordingly.
11. Page 379: Torch Lake is not listed nor discussed in the Lake Superior section.



Correct Torch Lake AOC Boundary Map 1

Ashizawa, Annette (ATSDR/DTEM/ATB)

From: Elster.Mark@epamail.epa.gov
Sent: Thursday, November 02, 2006 8:55 AM
To: Fisher.Jacqueline@epamail.epa.gov
Cc: Ashizawa, Annette (ATSDR/DTEM/ATB); Cowgill.David@epamail.epa.gov;
Gulezian.Gary@epamail.epa.gov; thomas.vicki@epamail.epa.gov
Subject: Re: EPA Comments on ATSDR AOC Report

Annette:

I've finally found time today to go over the Exec Summary and the conclusions section of the report. But two early comments and the rest later today.

I strongly advise letting the Federal State AOC Coordinating Committee (FEDSTACC) review this document. FEDSTACC was called for in the December 2005 Great Lake Regional Collaboration Strategy Report as called for under the President's Executive Order on Great Lakes management. The entire effort is managed by the Great Lakes Interagency Task Force, a cabinet level committee chaired by EPA Administrator Johnson. I believe your cabinet secretary is on it, too. FEDSTACC has all of the eight GLs states RAP Program Managers as well as RAP program managers from five federal agencies. It also has the Great Lakes Commission and we are looking for tribal representation. FEDSTACC is basically charged with setting US RAP policy and priorities. I think they really need to review this before it goes public. I would be happy to help you coordinate this effort. Under separate email, I will forward you the original call letter for the creation of this group.

Regarding the maps used for your analysis. I remember sharing early drafts of the maps with one of your staff a while ago. His name escapes me. I explained that the maps were draft and that we were in the midst of a process to finalize them in GIS form and I encourage him to wait until then. The maps have now been finalized are in GIS format (ARC Shape files) which I would be happy to share with you. Using these finalized maps would help you greatly in narrowing the field of sites addressed. I urge you to consider redoing the study with the official boundaries.

Regards,

Mark Elster

Senior Program Analyst

USEPA-Great Lakes National Program Office

77 W. Jackson Blvd. (G-17J)

Chicago, IL 60604

P: 312-886-3857

F: 312-353-2018

email: elster.mark@epa.gov

website: www.epa.gov/glnpo/
