

Ashizawa, Annette (ATSDR/DTEM/ATB)

From: Fisher.Jacqueline@epamail.epa.gov
Sent: Wednesday, June 30, 2004 2:50 PM
To: Ashizawa, Annette
Cc: Stevens, Yee-Wan
Subject: Re: Comments from USEPA re ATSDR AOC Report

Attachments: 4364081.wpd; AOC HH report comments.wpd



4364081.wpd (6 KB)



AOC HH report comments.wpd (89..)

Hi Annette, We sent our comments to Chris DeRosa on this past Friday or Monday. Attached is an electronic copy . . .

(See attached file: 4364081.wpd) (See attached file: AOC HH report comments.wpd)

"Ashizawa,
Annette"
<ADA8@CDC.GOV>

To: Jacqueline Fisher/R5/USEPA/US@EPA
cc: "Stevens, Yee-Wan" <YTS1@CDC.GOV>
Subject: Re: Comments from USEPA re ATSDR

AOC Report

06/30/04 10:27 AM

Jackie,

This is a follow-up to a message that I left at your home-work #. ATSDR needs to know when we will receive EPA's comments for the ATSDR AOC report. Could you give me a date asap? ATSDR is being pressed to finalize this report, and we cannot do this until we obtain EPA's comments.

I also wanted to alert you that I will be out of the office all next week. For all e-mail correspondence, particularly within the next week, could you cc my Supervisor, Yee-Wan Stevens? She needs to be informed about any issue that requires immediate attention. You can reach her at the following # and e-mail address:

Yee-Wan Stevens
#: (770) 488-3325
e-mail address: YStevens@cdc.gov

Hope you have a safe holiday!
Annette

Christopher T. De Rosa, Ph.D.
Director, Division of Toxicology
Agency for Toxic Substances and Disease Registry
1600 Clifton Road NE
MS F-32
Atlanta, Georgia 30333

Dear Dr. De Rosa:

Thank you very much for providing a copy of your draft report entitled "Public Health Implications of Hazardous Substances in the 26 U.S. Great Lakes Areas of Concern" for our review. Clearly a significant amount of work went in to the preparation of this report. The Great Lakes National Program Office circulated the report for review and comment between three of U.S. EPA's regional offices, II, III, and V, including Superfund and our other program offices. We compiled all of the comments we collected and are enclosing them as part of this letter. Due to the limited amount of time given for our review, U.S. EPA may need to provide additional comments on this extensive report.

Our comments on the report fall into seven categories: report accuracy, beneficial use impairments, methodology, binational AOCs, AOC maps, report use, and perception. Based on our review, we highly recommend that ATSDR go over the status of each of the AOCs to make sure that the information is up to date. Since this project is a preliminary evaluation of the public health implications in the AOCs, we recommend that ATSDR more clearly outline the methodology and limitations of drawing conclusions in this report. Also, while the report prefaces that health outcome data examined in the counties of the AOCs were not used to make causal inferences between exposure and health effects, additional explanation or consideration needs to be given to prevent possible misunderstanding or misuse of the report.

While we are impressed with the level of effort that went into preparing this document, U.S.EPA suggests that you consider making this report available to the States and Tribes for their review prior to the proposed public comment period. The States and Tribes play a very important role in the management process and environmental clean up at each of the AOCs. Their review of this report is imperative to ensure accuracy. Also, U.S. EPA would appreciate the opportunity to go over this report after our comments are addressed and before it is made available to the public for comment.

Sincerely,

Gary V. Gulezian
Director

Enclosure

cc: Mario Del Vicario Reg 2
cc: Milt Clark EPA SFD-SR 6-J

U.S. EPA, Great Lakes National Program Office Comments:

Public Health Implications of Hazardous Substances in the Twenty-Six U.S. Great lakes
Areas of Concern (AOC), April 2004 Draft

General Comments:

Report Accuracy:

ATSDR denotes that many of the hazardous waste sites that, in the past, contributed to human exposure or the environmental burden of the IJC critical pollutants and other contaminants have been remediated. U.S. remedial programs have been very successful in cleaning up most of these sites and will continue to address the remaining sites that may be contributing to potential human health implications in the AOCs.

While we find the report may be useful, it was not up to date regarding remedial actions taken at key waste sites within the AOCs. Superfund has provided additional up to date information, remedial project managers (RPM) with phone numbers, on AOCs where elevated adverse health data was reported. In addition, GLNPO has provided U.S. EPA Remedial Action Plan (RAP) liaison contact information for each of the AOCs.

Currently, the report uses some incomplete and out of date information (remedial action status, public health assessments, etc.) which could create public communication problems. For example, the APCO brownfield site is highlighted in the report conclusions as a Rochester AOC public health hazard requiring remediation. In fact, the APCO site has been remediated through a county, state and local partnerships and is considered a significant success.

Some key sites where we determined information to be dated are noted in the AOC specific comment sections. Due to time constraints, our evaluation of each of the AOCs is cursory and we recommend that ATSDR continue to do fact checking, especially with the States and Tribes, before the document is released for public comment.

Beneficial Use Impairments:

The AOC summaries in the report should include a list of the beneficial use impairments (BUI) tied to human health for each AOC. The beneficial use impairments related to human health include: restriction to fish and wildlife consumption, restrictions on drinking water consumption or taste and odor, and beach closings.

The approach the researchers took during the preparation of the report may need to be reshifted to focus on the AOC as it relates to its BUIs and not geographic area. The

report could be improved if it tied the functional relationship between chemical burdens and public health, and BUIs.

Methodology:

The readers of this report would really benefit from an executive summary, expanded introduction and methodology section. We would like to see for example, a discussion of why the US side of the binational AOCs were excluded. Because there is limited explanation of the expected relationship between, or relative contribution of, CERCLIS and TRI data and the hazards posed in the AOCs, it is hard to place the information presented into context of AOC and BUIs.

The report's title and introductory paragraph suggests that it provides a comprehensive assessment of a wide variety of recognized sources of hazardous substance exposures that have the potential to impact AOC human populations. After a quick review of the Lake Ontario AOC sections of the report, it appears that the report provides a very selective assessment of relatively few sites of potential concern that ATSDR has been involved in, federal superfund sites and TRI release data. Unfortunately, some of these sites may have little relevance to AOC populations. We recommend reviewing the relevance of the sites presented in the report to actual AOC sources and BUIs.

Below is a list of topics where improved understanding of the methodology would be helpful.

AOC Boundary and Watershed:

The report reviews NPL and CERCLIS sites in the vicinity of the AOC. Some of the highlighted sites are not only outside of AOC boundaries but also in multiple watersheds. The reader would assume from the title that the report is focusing on hazardous substance impacts within AOC areas. However, the discussions include sites that are not in the AOC watersheds or are so distant from the AOC populations that little if any impact would appear likely. To eliminate some confusion, perhaps, some of these sites should not be used in the report if they are outside the watershed or appear to have no relevance to the BUI.

By looking at county health data, the report has redefined the extent of AOCs to be the same as the county that they are located in. Tables and text use the phrase "in the AOC" when they appear to mean "in the AOC county". In the case of the Eighteenmile Creek AOC, the only site identified in this AOC, Barker Chemical, has no relationship to the Eighteenmile Creek AOC. It is ~7 miles east of Eighteenmile Creek located in a watershed that drains to Lake Ontario more than 10 miles east of the mouth of Eighteenmile Creek. There are a number of sites related to hazardous substances within the Eighteenmile Creek AOC that could be considered as part of this evaluation.

AOC staff should be asked how they would define the geographic extent of their AOC population. Many of the sites that have been highlighted are not located within the AOCs. The report should clearly describe how far away they are from AOC populations. Simple statements like "upstream of the AOC" are insufficient and do not provide the necessary context to understand how relevant the site is to an AOC.

Health Assessments:

It is recognized that ATSDR compiled a tremendous amount of information together for this report. As part of their review, 115 hazard waste assessments were evaluated in 54 counties. Although this is a tremendous undertaking, the review of these particular assessments is a representative sample of environmental health assessments in the AOC. The hazard waste assessments used in the report were conducted at NPL/CERCLIS sites in or in proximity to the AOCs. There may be other health assessments completed in the AOC vicinity at RCRA or TSCA regulated sites that if added to the report, may improve the representativeness of health assessments.

We would recommend limiting the use of sites that have 10 to 15 year old health assessments especially, if additional corrective action has been completed at these sites. We also suggest not presenting the "public health hazard category" in tables or discussions where corrective action has been completed. Otherwise, the report positions these health assessment findings with the health assessment results on the first page of the AOC discussion and it is not until later that the reader learn that these assessments may no longer be accurate.

Although the report highlights sites with health assessments at a particular AOC, often times the report fails to mention the chief contributors of contaminants at an AOC. For example in the Raisin River AOC, the report makes no mention of the fact that the Visteon Plant (formerly Ford Monroe) located adjacent to the river, has been identified as a source of PCBs to the river. The health assessments presented in the report should ideally pertain to the chief contributor of contaminants to an AOC.

Exposure Assessment:

The analysis of human health data appears in the report to be based on where people live vs. where the releases are located. To improve the report ATSDR may want to include an analysis of the pathways for exposure.

When looking at public health implications in AOCs, one would expect to find information on beach closings due to high bacterial counts, etc. That might be another layer of importance for AOCs because many AOCs list beach closures, chiefly from high bacterial counts, as a beneficial use impairment. This report would be more complete if beach exposure was discussed as part of ATSDR's evaluation.

The report would be more helpful if it addressed human exposures related to contaminated sediments, fish consumption, active hazardous waste disposal sites, RCRA sites and others in a consistent way. Fish consumption issues are mentioned for some AOCs but not others. Because of these omissions, it is difficult to follow how general conclusions have been reached, such as there are no public health concerns in Lake Ontario AOCs. Although this conclusion may be true, the report should describe more completely the evaluation to substantiate this.

Contaminants Addressed in the Report:

The report begins with a logical focus on IJC critical pollutants but the TRI and HazDat tables include many more. It is unclear if the reader should be concerned with the other contaminants listed on these tables. The text does not discuss any issues related to non- IJC contaminants. Perhaps the report should be limited to examining the IJC critical pollutants plus any additional critical pollutants identified by a specific AOC. This would greatly reduce the size of the document by eliminating lengthy tables that provide data that is not used in any way.

The report focuses mainly on point sources (CERCLIS and NPL sites) in or near the AOCs. While having a better understanding of the point sources is critical, the report should also include information of non point sources as part of the evaluation. Agriculture runoff, leaky septic systems and CSO/SSO problems all contribute to human health in the AOC.

Use of County-Wide Data:

Unfortunately, the use of countywide computer "data dumps" for TRI, HazData and Public Health Outcomes may not provide very representative information for some AOC areas. For example the Buffalo River AOC TRI table includes facilities in Tonawanda located in the Niagara River AOC not the Buffalo River AOC. The Oswego AOC TRI listing includes a facility in the town of Pulaski nearly 20 miles east of the AOC. Pulaski has no link to the AOC. These types of errors suggest more attention needs to be given to understanding and interpreting the results of the data retrievals.

County Health Data:

The report evaluates county-wide health outcomes. This evaluation may not be indicative of the potential impacts of sub-county sized AOCs. There is no one-to-one geographic correspondence. AOC specific health outcomes data most likely does not exist; the report should make this clear when discussing its findings. For example, for the Waukegan Harbor AOC, ATSDR presented a profile for relatively affluent Lake County, IL which does not reflect the EJ, struggling community and associated issues in the City of Waukegan.

We recommend adding a more detailed explanation of how human health outcomes were generated and evaluated for this report. It would be beneficial if the community health status reports cited in the report could be accessed from the website that is provided. This way the reader has a way to get additional information on the methods used.

Please provide more information on the "U.S. rates" and to which human health outcomes are being compared. Are medians being evaluated? What criteria were used to determine that AOC's county-related human health outcomes are "unfavorable"? Exceedence of the median of a group of 20 peer counties alone may not provide an adequate basis. We are looking for more information on how the data were handled in cases where the AOCs cross more than one county or include both industrial and rural areas.

Some of the negative health outcomes that would appear to have no relationship to exposure to hazardous substances such as "unmarried mothers" or "no first trimester care" should be removed and/or discussed as potential contributing factors to negative health outcomes like infant mortality.

The report would improve if ATSDR added a discussion of how county wide human health statistics relate to specific contaminant exposures within an AOC.

At times, the health statistics are confusing. For example, the "associations" section in the conclusions describes higher birth weights as negative associations. The report should explain clearly that "higher birth weights" is a positive, not a negative. For example, higher birth weights may potentially be associated with fish consumption from Lake Michigan/Sheboygan River.

We also suggest dropping the "County Health Indicator" discussion sections because they simply restate the earlier and equally brief "County demographics and health status" sections.

TRI & Waste Site Contaminants Tables:

We suggest looking at the TRI data to determine if the TRI indicates potential impacts in the AOC. Many of the contaminants are not bioaccumulative. We suggest adding a discussion of whether or not these TRI emissions exceed criteria designed to protect human health. Large emission numbers would not be of concern if a substance is not bioaccumulative and at concentrations well below levels of concern for human health. In addition, the emissions are not linked to a specific facility because, TRI totals are presented in the report. TRI facilities are listed on a separate table with no emission data. Without knowing the location of specific emissions (within the AOC vs. 20 miles distant) the relative importance of these data is hard to evaluate.

The TRI data provided in the report is of interest from a regional perspective. It's major focus is on air emissions with no evaluation of potential impacts to the AOC on a local level. AOCs were designated based on the local impacts to the aquatic system, not a perceived regional impact by industry to the Great Lakes region as a whole. If ATSDR were viewing impacts from a site from a regional perspective, Chicago would be an AOC.

Although the TRI data indicate the year it was collected, the waste site contaminant tables provide no information on when (1980s?), where (within the AOC?), contaminant concentrations or how representative they are in the AOC. Only the number of "records" that exceed screening criteria are provided. Please provide information on which screening criteria were used how this database was generated. Although the titles of these tables indicate the data is collected from within the AOC it is likely that some of this data is from outside the AOC areas as it appears that everything within AOC counties was considered.

Ranking:

The information in this document may support relative rankings across AOCs taking into account contaminants, exposure pathways, health outcome data, and vulnerable populations. This would be doable only if the AOC maps are correct and if health data matched more closely with the geographic extent of the AOCs. At that point, the Report might be able to support relative rankings.

Binational AOCs:

The US side of the binational AOCs are not covered in this report. An explanation should be given for why the Detroit, St. Clair, St. Mary's, Niagara River, St. Lawrence Rivers, and Massena AOCs are not included in this report. Although these are binational AOCs there are separate U.S. and Canadian RAPs. Given the large population in the U.S. AOCs area, we would like to know if the US side of the binational AOCs will be evaluated in the future.

AOC Maps:

ATSDR prepared as part of this report 26 unique geographic information (GIS) maps that identify approximate AOC boundaries, waste site locations, TRI reporting facilities, and vulnerable populations. EPA is currently producing what we hope to be the definite GIS based maps of the AOC boundaries. We have been doing this in concert with the eight Great Lakes States. When completed, ATSDR may want to use these maps as the basis for their AOC study areas.

The report identifies NPL/CERCLIS sites on the AOC maps using the color green. The

reader can only identify the NPL/CERCLIS sites which had negative or undetermined health assessments. It would be helpful to the reader if the remaining NPL/CERCLIS sites could be identified as either sites with no health assessment or sites with no health hazard or apparent health hazard assessment.

Report Use:

We recommend the draft report not be released to the public until it has been revised based on U.S. EPA comments and comments from state and local governments directly involved with the RAPs. At times, the report provides only limited site information and some cases outdated assessments of only a few categories of hazardous substance sources within AOCs. The report would improve substantially if ATSDR involved the staff (states and tribes) most knowledgeable on current AOC issues. We recommend that ATSDR review AOC documents and add more AOC relevant information into the document. As such we recommend that the document not be used as the basis for IJC decision making. If released in its current form, the report could cause some confusion among the public and the media potentially diverting Great Lakes program staff, state and federal, away from productive work.

Perception:

While the report clearly prefaces that health outcome data (e.g., birth defects) examined in counties in the Areas of Concern were not used to make causal inferences between exposure and health effects, additional consideration needs to be given to potential misunderstanding or misuse of the report. Some people may still draw a connection between AOC proximity and negative health effects.

We also believe it is important to emphasize the limitations in the health findings, in particular that elevated rates of disease could be related to many factors unrelated to exposure to toxic chemicals or hazardous wastes. These factors should be given greater emphasis in the document.

Next Steps:

ATSDR states that it would like to continue its discussions with the IJC in hopes of generating hypotheses for future research and collaboration. Because the Parties are undertaking a review of this report, we would also like to be included in any discussions on the future of this type of research.

The report represents the first phase of a data collection effort. We recommend a second phase that would include consulting with state and local governments directly involved with AOC issues to check on the accuracy and completeness of this data. A third phase if possible, could include interpreting the data and, highlighting specific

contaminants of concern for each AOC. Although the current draft does contain some insightful site-specific assessments the majority of the data presented is disjointed with no discussion or interpretation provided on potential human health impacts.

Specific Comments:

Introduction:

P. 1 - First Sentence – This sentence should be revised as all of the AOCs are no longer "severely degraded". Environmental conditions have improved significantly at many AOCs since they were identified.

P. 1 First Paragraph, Last Sentence – This sentence should be rewritten as it suggests that this report is providing "a systematic evaluation of the contribution of hazardous waste sites to the environmental contaminant burden and its impact on human health." This document does not explicitly provide this.

P. 2, Last Sentence – The sentence should be revised to indicate that the information contained in this document is insufficient to support relative rankings of AOCs given the fact that it does not address all known potential sources of hazardous substance exposures.

AOC Comments:

Ashtabula River, Ohio

Contact Information

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and

Therese Van Donsel

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Section 3.3.1.2.

Remediation at the Fields Brook Site has been completed. Remedial action work began in the field on May 25, 2000 with the construction of an on-site "TSCA-equivalent" landfill built for the disposal of all excavated Fields Brook sediment and flood plain soils that did not require thermal treatment. In addition, the on-site landfill was made available to the site potentially responsible parties (PRPs) for disposal associated with the remediation of the six Fields Brook Source Control Operable Units.

Landfill construction was completed on September 6, 2000.

Soil and sediment excavations from the brook were designed to meet the following requirements:

PCBs in flood plain/wetland areas - In industrial areas of the brook, flood plain/wetland areas with total PCB concentrations at or above 50 ppm were excavated. In residential areas, grids with 6 ppm or more total PCBs required were excavated. According to design calculations, this should have resulted in a final average PCB cleanup level of 1 ppm on average in residential areas and 6 to 8 ppm on average in industrial areas.

PCBs in sediment - Excavation benchmarks varied within the brook and were designed to meet a sediment cleanup goal for PCBs of 1 ppm on average for residential areas of the brook and 3.1 ppm on average for industrial areas of the brook.

Hexachlorobenzene in floodplain/wetland areas - In industrial areas of the brook, floodplain/wetland areas with hexachlorobenzene concentrations of 200 ppm were excavated. In residential areas, grids with 80 ppm or greater of hexachlorobenzene were removed. Based on design calculations, the result of the cleanup would be 0.8 ppm on average in residential areas and 6.7 ppm on average in industrial areas.

Hexachlorobenzene in sediment - Benchmarks for sediment excavation due to hexachlorobenzene contamination varied within the brook, but were designed to meet a sediment cleanup goal of 6.38 ppm on average for residential areas and 15 ppm on average for industrial areas of the brook.

Radium - A sediment and soil cleanup standard of 10 pCi/g total radium (ra-226 + ra-228) above background was established for the industrial area of Fields Brook. For residential areas, sediment and soil were excavated to meet a standard of 5 pCi/g of total radium above background.

Uranium - A uranium standard of 30 pCi/g was established for the entire brook (residential and industrial soil and sediment) to be consistent with the U.S. Department of Energy cleanup of the RMI Extrusion facility.

Excavation began in the brook on September 22, 2000 and was completed on December 16, 2002. It is helpful to note that since radionuclides were not determined to be a contaminant of concern until well into the design phase of the project (when excavation benchmarks had already been established for other contaminants), the addition of grids with radionuclide contamination would result in lower average concentrations of residual contaminants than required by the design. At completion, 53,094 cubic yards of contaminated sediment and floodplain soil were excavated from Fields Brook. Long-term monitoring of brook sediment and floodplain soils will begin in 2004. With the remediation of the six Fields Brook Source Control Operable Units,

actual and potential sources of recontamination to the brook have been addressed.

In addition, Reactive Metals, Inc. (RMI) is mentioned in this section. There were in fact three RMI facilities in the industrial area of Fields Brook. It seems that the facility being addressed in the report is the RMI Extrusion plant that is undergoing a DOE-funded decommissioning. The DOE contact for the facility (John Ganz 440-993-2017) should be contacted to provide an update on the status of the site cleanup.

Section 3.3.4.1

The Fields Brook cleanup is complete. Reference should instead note that monitoring data will be collected using the site Operation, Maintenance and Monitoring Plan.

Section 7.1

Update report to reflect the completion of the Fields Brook cleanup.

Black River Ohio

Contact Information

Anne Marie Vincent

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General Comments:

The general delineation of the AOC looks to be correct.

The Black River AOC occupies over 50% of Lorain County, as well as portions of Huron County, Ashland County, Medina County, and Cuyahoga County. The AOC is the entire watershed for the Black River. Probably the major industrial type cities/areas are the City of Lorain and City of Elyria. Wellington, Oberlin and Lodi, Ohio would be the next locations where small, light industry would be. But these three locations probably only have a handful (<5) facilities in each location. The majority of the watershed is agricultural in nature outside of the major city areas.

Only two industries were mentioned specifically, Republic Steel and Ford Road Landfill in regard to study information. These two facilities would constitute a representative sampling of all industries in the AOC. Based on general observations, one would find quite a few of light to moderate industries such as metal working shops, autobody shops, platers, printers, etc. within the AOC area. There are several other industries such as the local power plant, hazardous waste incinerator, steel plant, auto manufacturing plants, etc.

In the Black River AOC, agricultural run-off (nutrient/sediment loadings), storm water run-off (and associated run-off pollutants), sedimentation from habitat loss and rapid construction growth, CSO/SSOs, and failing home sewage treatment systems are among the current hot topics within the RAP community as far as water quality degradation. These are all non-point sources and are not being addressed in the report.

Many of the Black River's Beneficial Use Impairments (BUI) are linked with non-point source pollution, so that single "tie" probably doesn't exist between BUI and the contaminants listed in the report. Additionally, some BUIs (degradation of fish and wildlife populations), do not really pertain to human health risks or factors. The BUI for fish tumors and other deformities were just redesignated as "In recovery" in the Black River AOC. This was the only BUI which was linked to contaminated sediments in the mainstem area of the Black River near the USS Kobe Steel plant. In the early 90s, much of the PAH contaminated sediments were dredged from the river (by the steel company). Over the years there has been a significant decline in the prevalence of fish tumors and other deformities, hence the redesignation announced this past April 2004. This is the only BUI that could be linked to a specific point source of contamination.

Section 3.5:

The east and west branches of the Black River join to form what is referred to as the mainstem. In local discussions and RAP documents, the "main channel" as it is referred to in this report, is more commonly referred to as the "mainstem" of the Black River.

Section 3.5.1:

Currently, a Remedial Investigation/Feasibility Study is being conducted at Ford Road Industrial Landfill to define the nature and extent of contamination pursuant to the July 2002 Administrative Order on Consent (AOC) signed by the PRP Group and the U.S. EPA. Soil, sediment, groundwater and surface water samples are being collected to help define the contamination, as well as soil borings to determine the perimeter of waste at the site. It is anticipated that remediation could occur as early as FY06.

Buffalo River, New York

Contact Information

Marie O'Shea

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Due to the short time allowed for our review we were not able to perform a detailed review for the Buffalo River AOC.

Clinton River, Michigan

Contact Information

Laura Evans
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Due to the short time allowed for our review we were not able to perform a detailed review for the Clinton River AOC.

Cuyahoga River, Ohio

Contact Information

Mark Moloney
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General Comments:

Health concerns on the Cuyahoga River generally involve problems with CSO/SSO discharges (e.g. bacteria issues). These problems are a significant everywhere in the AOC but particularly downstream of Akron in the Cuyahoga River Valley National Park. Water contact in this significant recreation area must be restricted because of bacteria levels.

Section 3.4.1:

The report lists the Cady Road site in the Cuyahoga AOC as an urgent public health hazard. While public health issues at this site may exist, these health issues are not tied to the Cuyahoga River or its tributaries and the BUI. The Cady Road site involves gases emanating from drinking water wells which may present an explosion hazard.

Deer Lake / Carp River, Michigan

Contact Information

Mary Beth Ross
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General Comments:

Since historic gold mining activities are the chief source of contaminants impacting the BUI in the Deer Lake AOC, the Cliff/Dow dump in Marquette (outside of the BUI) may not be directly impacting the AOC. Deer Lake is listed as an AOC because of degradation of fish and wildlife populations.

Fish had been contaminated with high levels of mercury in excess of the MDPH's action level of 0.5 mg/kg wet weight, which resulted in a fish consumption advisory for Carp Creek, Deer Lake, and the Carp River. Sources of mercury include both point and non-point sources. Point sources included the old sewage treatment plant and CSOs from the City of Ishpeming. Fortunately, the new treatment plant began operating in 1986. Sediment throughout Deer Lake have been contaminated with mercury and some metals. The area was the site of gold mining since the 1880's and mercury amalgamation was used. Tailings were deposited in several tributary creeks.

There is no mention of sewage treatment plants, CSOs, or any other potential sources that could affect public health.

Detroit River, Michigan/Ontario

Contact Information

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The US side of the binational AOCs are not covered in this report and there doesn't seem to be a rationale presented of why the Detroit, St. Clair, St. Mary's, Niagara, and St. Lawrence Rivers were not included. This is disappointing, especially considering impacts of Detroit on the Great Lakes system.

CERCLIS data would not necessarily encompass all of the contaminants in an AOC that effect beneficial uses. In AOCs, like Detroit, CERCLIS sites represent only a small portion of contaminant sources (if any contribution at all) compared to all of the other impacts to the BUIs.

Eighteenmile Creek, New York

Contact Information

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Due to the short time allowed for our review we were not able to perform a detailed review for the Eighteen Mile Creek AOC.

Fox River / Green Bay, Wisconsin

Contact Information

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Due to the short time allowed for our review we were not able to perform a detailed review for the Fox River/Green Bay AOC.

Grand Calumet River / Indiana Harbor Canal, Indiana

Contact Information

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Due to the short time allowed for our review we were not able to perform a detailed review for the Grand Calumet AOC.

Kalamazoo River, Michigan

Contact Information

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Due to the short time allowed for our review we were not able to perform a detailed review for the Kalamazoo AOC.

Manistique River, Michigan

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Due to the short time allowed for our review we were not able to perform a detailed review for the Manistique AOC.

Maumee River, Ohio

Contact Information

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General Comments:

The boundaries appear similar to a map obtained from Ohio EPA.

The Final Report should verify facility locations, and consider only including facilities located in the AOC in the data presentation and discussion.

Sections 3.6.1 and 3.6.4.1

Hazardous waste sites are listed outside of the Maumee AOC. Hazardous waste site, Brush Wellman, of Elmore, Ohio is not in the Maumee AOC. This site is also included in the TRI data. It is located in the Portage River watershed in the portion of Ottawa County not in the Maumee AOC. This facility appears as the big TRI "red dot" seen in the Maumee AOC Map in the Appendix, just south of the AOC boundary in Ottawa County. Other TRI facilities in the Portage River watershed, and outside the Maumee AOC, are those listed in Pemberville and North Baltimore.

Menominee River, Michigan / Wisconsin

Contact Information

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Due to the short time allowed for our review we were not able to perform a detailed review for the Menominee River AOC.

Milwaukee Estuary, Wisconsin

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Section 5.5.1 and 5.5.1.4

Moss-American Site

The remedial status discussion ends with the performance of thermal desorption work for certain site soils, and then notes that contaminated sediments are in the remedial design stage. EPA has moved into the remedial action stage for at least a significant portion of the sediment management phase involving the Little Menomonee River. (For management purposes, the LMR is thought of as five segments below the former creosote operation). Beginning in late August 2002, Segment 1 was addressed using a combination of river rerouting (creation of new channel) and dredging. After

stabilization of new channel excavation, the most highly contaminated sediments were removed from old channel areas after dewatering and prior to backfilling. About 10,000 cubic yards of contaminated sediments were excavated in this fashion. Segment 1 work was completed by around March 2003. Design efforts for similar work in Segments 2 and 3 were approved of by U.S. EPA and WDNR in early 2004. Since March 2004, remedial action has been proceeding in Segments 2/3. This work is proceeding in two phases - 1.) creation of new channel length (about two-thirds of the stream length in Segments 2/3; reroute is not possible where the floodplain is particularly narrow or in close proximity to road/railroad bridges) - to be finished by the end of June 2004. After new channel stabilization, dewatering of old channel areas and excavation of more highly contaminated sediments will resume in early Fall 2004, likely continuing into early 2005.

Milwaukee Solvay Coke and Gas Company (Solvay Coke),

The Milwaukee Solvay Coke and Gas Company (Solvay Coke), a former manufactured gas plant was one of the largest gas manufacturers in the area. Solvay Coke was established in 1902 and was closed in 1983. In 1983, Wisconsin Wrecking Co (WWC) a concrete recycling company, entered into a lease/purchase agreement with Cliffs Mining Co (a/k/a Pickands, Mather and Company). At its peak, the plant operated 200 coke ovens, which produced up to 800 tons of coke per day. Over the past 80 years of operation, Solvay produced metallurgical coke for use in the production of steel. It also produced various by-products from its coking production such as coal gas and coal tar. Today the site is vacant and proposed for re-development as commercial use, and high density residential use. The site covers approximately 46 acres of water front land and is bordered by East Greenfield Avenue to the north, the Kinnickinnic River Basin to the south and east, and railroad tracks to the west. The southern portion of the site was originally marshland, but by reclamation was converted into one of the most valuable and advantageous industrial locations in Milwaukee. A further site assessment is required to understand the extent of contamination, but in the initial Site Assessment conducted by the U.S. EPA in 2003, contaminants identified include polycyclic aromatic hydrocarbons (PAHs), phenols, benzene and cyanide. At the request of the U.S. EPA, the Wisconsin Bureau of Environmental Health (BEH), under a cooperative agreement with the Agency for Toxic Substances and Disease Registry, prepared a public health consultation for Solvay Coke. Based on an interpretation of the site assessment report and site visits, BEH concluded that soil and groundwater beneath this former coke and manufactured gas facility is heavily contaminated with coal tars, but does not present an immediate public health threat.

Muskegon Lake, Michigan/White Lake, Michigan

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General Comments:

Muskegon Lake and White Lake AOCs are combined in this report. The site information presented for these AOCs are not located in the physical boundaries of the AOC and are instead located Mona Lake watershed, which is not part of any AOC.

Map Comments:

1) The Muskegon Lake boundaries should also include the tributaries to the lake, including: Ruddiman Creek; Ryerson Creek and Division Street outfall. These seem to be omitted from the map.

2) The White Lake AOC should include the whole lake and not just the near shore area. Peerless Plating Superfund site is not currently part of the Muskegon Lake AOC. Peerless Plating is actually part of the Mona Lake watershed.

Specific Comments:

Section 5.1.1.

The Whitehall Tannery on White Lake was a significant historical source of contamination to the lake. Contaminants of concern from the tannery included: mercury, chromium and arsenic. The upland area is being addressed through the state Superfund program and the sediments in the lake have been addressed by a clean-up jointly funded by U.S. EPA; MDEQ and Genesco, Inc.

Niagara River, New York

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Binational AOCs are not covered in this report.

Oswego River / Harbor, New York

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should begin with a clear statement that none of these sites are within the
aries. The Volney Landfill is nearly 6 miles from the upstream boundary of
and two miles from the Oswego River.

ment that the PAS site is "close to the AOC" should be expanded. The PAS
Wine Creek which drains directly to Lake Ontario and is not in the Oswego
harbor. It is more than one mile east of the AOC boundary. Longshore
draw Wine Creek inputs eastward away from the AOC.

ormation has been relied upon to draw the conclusion that PAS is no longer a
of contaminants? Fish tissue monitoring and water sampling results may
that low level inputs are continuing. A Fire training area and a landfill, both
to be associated with hazardous wastes and located directly upstream of PAS
not discussed here. Possible contaminant inputs from these sites had been
ed as precluding fish reproduction. This is one example of the incomplete nature
report's assessment of potential hazardous waste sources.

usions. The first sentence states that releases "may have occurred" the last
ence says "releases into streams draining to Lake Ontario" occurred.

esque Isle Bay, Pennsylvania

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esque Isle Bay is now categorized as an AOC "in recovery."

Please update the spelling of Millcreek. The landfill area has been increased. In the
report, lead and PCBs are presented as significant contamination. I think that PCE
which were found only in 10 percent of soil samples, and lead are not as common
their concentrations were relatively low. VOCs and SVOCs are more important in
area. We concur that this site doesn't pose an environmental problem. The treat
plant in the last 6 years met the cleanup goals every month.

River Raisin, Michigan

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The report could be of more help to RAP Liaisons, if there was a better link between the identified sources of contamination and the beneficial use impairments at the Raisin River AOC.

The report should further attempt to identify or evaluate the major, on-going problem within the AOC, which is the presence of extensive PCB contamination in the sediments and fish tissue. In addition, the report should mention that the Visteon Plant (formerly Ford Monroe) located adjacent to the river, has been identified as a source of PCBs to the river, and that TSCA level PCB wastes are now stored in an on-site disposal cell. However, the active, potentially uncontrolled waste sites are a secondary concern when viewed in the context of the extensive PCB levels in the river sediments from historical sources. The report should identify or evaluate the CSO and bacteria levels that affect the health of boaters and bathers and lead directly to most of the beach closings.

Finally, the TRI data provided in the report is of interest from a regional perspective only. It's major focus is on air emissions with no evaluation of potential impacts to the AOC on a local level. AOCs were designated based on the local impacts to the aquatic system, not a perceived regional impact by industry to the Great Lakes region as a whole. If we were viewing impacts from a site from a regional perspective, Chicago would be an AOC.

Rouge River, Michigan

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Due to the short time allowed for our review we were not able to perform a detailed review for the Rouge River AOC.

Rochester Embayment, New York

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Section 2.2.1.1.

The APCO brownfield site is highlighted in the AOC discussion and the report conclusions as a Rochester AOC public health hazard requiring remediation. In fact, the APCO site has been remediated through a county, state and local partnerships and is considered a significant success.

Saginaw River / Bay, Michigan

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The data in the report appears to be factually correct for the Saginaw River AOC. ATSDR has correctly identified the active waste sites and the ones that have been cleaned up. They have gone outside of the AOC in their analysis, but I believe this makes sense given that they may be source areas to the AOC. The report accurately states that there are ongoing sources of pollution to the AOC.

However, there are some systematic problems with the overall approach. Basically the analysis of human health data appears to be based on where people live vs. where the releases are.

To improve the report ATSDR may want to include an analysis of the pathways for exposure. In the report, in the Saginaw Bay region counties that are upwind of the industrial facilities have a HIGHER rate of human health problems than downwind sites -- which is counter intuitive. But exposure in the AOC is not direct exposure, rather it is likely through fish consumption. Just based on what I saw, I would expect that the wealthier communities downwind of the AOC do less fishing, while the communities upstream probably do more. That alone might explain the distribution of health problems. But unfortunately the design of the study is not able to make that assessment.

ATSDR did a good job with data reporting (which is no small effort!), but because they aren't looking at "causal pathways of exposure", they are simply reporting correlations between source areas and human health problems.

St. Clair River, Michigan / Ontario

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International AOCs are not covered in the report.

St. Lawrence River, New York

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International AOCs are not covered in the report.

St. Louis Bay / River, Minnesota / Wisconsin

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Due to the short time allowed for our review we were not able to perform a detailed review for the St. Louis Bay/River AOC.

St. Mary's River, Michigan / Ontario

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International AOCs are not covered in the report.

1. Binational areas of concern (AOCs) do not appear to be included in the document. If, at a future date, it is decided to include the binational AOCs, ATSDR should coordinate the project with their Canadian counterparts, ensuring the same methodology and data selection.
2. Some AOCs (St. Marys River) for example, include federally-recognized Indian reservations. There may be relevant health data available from tribal health departments or the Indian Health Service.
3. A primary focus of the Report seems to be hazardous waste sites (CERCLA NPL). Does this truly provide an accurate assessment of the health implications of an AOC? Will this Report raise a number of false conclusions on the part of the general public?
4. Is it correct to assume that the TRI data used in the Report relates to U.S. facilities? Probably the two largest industrial sources in the St. Marys River AOC are located on Canadian territory (Algoma Steel and St. Marys Paper). Prevailing winds transport air emissions from these facilities to the U.S. side of the AOC. Would the current methodology used to develop this Report capture these sources?

Sheboygan River, Wisconsin

Due to the short time allowed for our review we were not able to perform a detailed review for the Sheboygan River AOC.

Torch Lake, Michigan

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The map provided that outlines the Torch Lake Area of Concern may have some serious flaws, they are:

- a. Houghton, as indicated is on the wrong side of the canal. Hancock is on the north side, while Houghton is on the south side.
 - b. The definition of the AOC is currently under great debate. This map indicates an area that is much larger than the one defined in the 1987 Remedial Action Plan written by Michigan Department of Natural Resources. It is not clear where this new AOC boundary came from, but they are currently under scrutiny.
 - c. Because the actual definition of the site boundaries are in question, I would strongly suggest that this map not be included. At best, the map should indicate that the boundaries are subject to further definition and may not be as indicated.
 - d. The NPL site boundaries are also incorrect. The Superfund site is not limited to just Torch Lake. Please refer to attachment 1 for a map of the Superfund Sites.
2. I checked the HazDat database (referenced in the report) and found the information related to Torch Lake AOC and Superfund site to be quite out of date. The information is based on a 1998 ATSDR evaluation that did not include what has occurred since 1999, when Superfund remediation began. To date, we have completed the remedy with all but two sites for a total of over 700 acres remedied. Therefore, the exposure routes, e.g. pica children, do not exist anymore for all of these locations.
 3. The database and 1998 ATSDR report refer to several brownfields without identifying what or where they are specifically. Many of the sites referred to in the 1998 report have been remediated and therefore no longer pose the threat presented in this Public Health Implications document.
 4. The question then becomes why was this report prepared without checking newer sources of information including, but not limited to the Superfund site remedial project managers?
 5. Section 6.2.1: it states "...indicates that contamination levels are within safety standards.". What standards are they referring to? The actual standards should

- be presented in the document so the reader does not have to refer to the document to find them.
6. The TRI data in Table 6-6 just shows exceedences, not the actual data. It would be better to present the data in addition to the number of exceedences.
 7. There are other sources of data for the site than just the TRI databases. Report preparers should have consulted these. This presents a picture that is probably worse than it is currently because only older data are used.
 8. Concluding that the site is a category 3 public health hazard, is somewhat misleading. This indicates that it is an indeterminate public health hazard. The risk assessment performed for the Superfund remedial investigation in the early 1990's concluded, based on pre-remedial data, that the site does not pose a risk to public health. The clean up Superfund is now performing in part on this conclusion and is being done to protect benthic communities and ecosystems, not human health.

Waukegan Harbor, Illinois

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It looks OK to me; but, it should be noted that I am no technical expert. I'm not a Coordinator, merely the EPA liaison. However, I am familiar with the sites, so I mention that I noticed:

4. and 7.1

Waukegan Harbor site has a new ATSDR Health Consultation dated 4/20/04 mentioned in the report. A new Health Consultation is also in draft form for the Waukegan (ATSDR/Illinois Dept. of Pub. health) site dated May 04, with a comment period open until 6/18/04.

When devoted to the H.O.D. landfill NPL site there is no mention that the site is a Superfund Reuse site. Tom Bloom in Superfund has details. In the 2003 fact sheet they refer to details a new risk assessment done by EPA in anticipation of reuse. Then, the nation's second "Certificate of Reuse" was issued for the site.

The Outboard Marine Corp. (OMC) site discussion does not mention, in regard to "Category of Public Health Hazard," that pregnant women and women of child bearing age, and subsistence fishermen are of special concern. This is important because the city of Waukegan has been designated by the Federal Interagency Working Group as an Environmental Justice Revitalization Project, and the harbor (AOC) is central to this effort.

In addition with regards to the OMC site, the report neglects to mention the W. Coke Plant site (an operable unit of the OMC site). Also, the IL Dept of Public Health has very recently (April 2004) done health assessments for the various OMC site operable units, including the OMC Plant 2 site. These could be consulted and used to update the report.

The Coke Plant soil remediation is set to begin this year and groundwater remediation is set to begin next year.