



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mail Code: G-17J

Dr. Howard Frumkin
Director
Agency for Toxic Substances and Disease Registry
Mail Stop F61
Chamblee, Georgia 30341-3717

Dear Dr. Frumkin:

We were pleased to review and comment on the most recent draft of the Agency for Toxic Substances Disease Registry report, "*Selected Information on Chemical Releases within Great Lakes Counties Containing Areas of Concern (AOC)*." This draft of the report captures many of the complexities of assessing human health and environmental exposures. Enclosed are our report comments. As you will see from the attached document, many of the comments are updates on the status of remediation projects.

Please do not hesitate to call me if you have comments or questions on these comments, at 312-886-5870 or Jackie Fisher of my staff at 312-353-1481.

Sincerely,

Gary V. Gulezran
Director

Enclosure



July 2, 2008

U.S. EPA's Comments on the Draft ATSDR Report "*Selected Information on Chemical Releases within Great Lakes Counties Containing Areas of Concern (AOC)*"

General Comments:

The document would be improved if additional emphasis was placed on current site conditions, and by referencing more detailed and recent EPA documents on site conditions. We have attempted wherever possible to identify specific changes to bring the report up to date. However many of the site discussions focused on Public Health Assessments (PHAs) that were written before remedial and removal actions had taken place, and refer to National Priorities List (NPL) fact sheets for updated information. Therefore, the exposure assumptions which are discussed may no longer be valid. Focusing the discussion on the conclusions of outdated PHAs, without the inclusion of more detailed information about the actions taken at site since the PHA was released, may lead to inaccurate perceptions of current site conditions.

For sites where the PHAs are out dated, EPA's Five Year Review Reports (FYRR) should be taken into consideration, as these documents provide much more detail than factsheets, and directly address many of the considerations in the reports (i.e., the actions have been taken to address exposures, and whether exposures are under control). We would urge ATSDR to review the most recent documents for all of the sites which can be found on U.S. EPA's web sites (http://www.epa.gov/region5superfund/hub_documents.html) and also www.epa.gov/superfund/sites/npl/npl.htm).

Another issue which was raised in comments provided last year is incomplete classification of waste sites and associated implications that Superfund has responsibility for such sites. ATSDR is claiming that many sites, such as the examples below, are non-NPL sites. These sites are not in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and therefore it should not be implied that they are non-NPL sites. CERCLIS is the Superfund database for CERCLA sites (non-NPL and NPL sites which include pre-remedial sites, removal sites, and NPL sites and deleted NPL sites).

Non-NPL sites are CERCLIS sites with CERCLIS identification numbers that have been evaluated for the NPL and it has been determined that these sites have No Further Remedial Action Planned (NFRAP). A NFRAP determination can be made after pre-remedial work such as Preliminary Assessment, Site Inspection or Expanded Site Inspection is completed at a site. EPA evaluates a release(s) to determine if the release(s) poses a potential threat to human health and/or the environment. A NFRAP determination is made when it is determined that the release(s) does not qualify for the National Priorities List.

In discussions with Michigan Department of Environmental Quality, some of the sites below (only a subset of many listed) are not non-NPL but brownfield sites which were

already evaluated and may have already been redeveloped. Some of these sites could also be RCRA sites. None of sites listed below are in CERCLIS. Unfortunately the report has not been set up to permit easy evaluation of site status. While there is a list of sites in Appendix 2 the "ID numbers" are just provided in the appropriate AOC section, making identification very difficult.

Gratiot Trailer Park, Detroit MISFN050791
Joy Road Dump, MISFN0507950
Packard Plant, Detroit, MIR000037689
Proposed Beard Street School, MIXCRA704000
Wholesale Russell/Mack, MIXCRA327000, MISFN0507878
Old World Trade Center, Detroit, MI0001094465
Grand Haven/Hamtramck, MIDCRA05D000
Mill Street Plant Brownfield Redevelopment, Ecorse, MIXCRA973000
Zonolite Co/W.R. Grace, Dearborn, MIXCRA822000
Continental Aluminum Corp, New Hudson, MI0001941699

It would take a significant levels of effort to go through all the sites (which requires communication with the states) to establish the proper classification and status. We believe it is appropriate for ATSDR to undertake this task before the report is finalized.

Specific Comments:

CHAPTER 3 - LAKE ERIE

3.3. Ashtabula River AOC, Ashtabula County, OH

3.3.1.3 Laskin Poplar Oil

Please change the following text in the second sentence to read "It is a former waste oil storage site, which had included 37 above-ground, in-ground, and underground oil storage tanks or pits."

In the conclusion discussion, the exposure assumptions are no longer valid. The site has been capped, eliminating any ingestion or inhalation risks; the capped area has also been dewatered, addressing the threat to nearby surface water; lastly, use restrictions are in place to prevent on-site exposures.

3.2.1.4 Millcreek Dump

Please change the text to include: The State of Pennsylvania took over the operation and maintenance of the Groundwater Extraction and Treatment System in September 2007.

3.5. Black River AOC, Lorain County, OH

3.5.1.2 Republic Steel Corp. Quarry

On page 107 please omit the following sentences: “Before 1950 this 4-acre site was a sandstone quarry. From 1950 to 1975 the site was used for the disposal of pickle liquor from a steel mill.” Please replace it with the following text: “The site consists of a 4.9-acre water-filled quarry surrounded by 7.4 acres of densely vegetated land. Prior to 1950, the site operated as a sandstone quarry. From 1950 to 1975, Republic Steel Corp. used the quarry as a disposal site for waste pickle liquor consisting of sulfuric acid and dissolved metal oxides, and for rinse water from pickling operations.”

3.5.4.1 Hazardous Waste Sites

Please change the text to include: The Republic Steel Quarry Site has been remediated by removal of contaminated soil and exposure is prevented by restriction of access.

Although contaminants remain in the quarry sediment, they are below the mixing zone. In the past, this site may have contributed to the environmental burden of the IJC-critical pollutants B(a)P and lead, and it may act as a reservoir for these contaminants.

Please omit the following lead sentence: “The Ford Road Industrial Landfill has not been adequately investigated.” Please replace it with the following text: “The Ford Road Industrial Landfill is situated on the Black River, and surface water and groundwater flow are toward the Black River. This site may have contributed and may continue to contribute to the Black River AOC’s environmental burden of IJC-critical pollutants, including PCBs. U.S. EPA reported (2008) that a Remedial Investigation and Feasibility Study (RI/FS) and a Record of Decision (ROD) was completed and there will be implementation of the clean up alternatives as outlined in the ROD. This will prevent any further contamination of the Black River by the Ford Road Site.”

3.9. Clinton River AOC, Oakland and Macomb Counties, MI

Table 3.9 -A Hazardous Waste Sites in Macomb County, MI

Please change Liquid Disposal, "Ind." to "Inc."

3.9.3.1 Hazardous Waste Sites

Please change the text regarding the Rose Township Dump to: “Complete capture of the groundwater plume is not occurring by the existing remedial system. Installation of additional recovery wells are being considered to augment the effectiveness of plume capture. One residential well is affected. In April 2005, a groundwater treatment system was installed in the basement of this resident. This treatment system has been successful at treating the groundwater concentration to non-detectable levels. A deeper well will be installed at this resident as a permanent solution. The potential remains, however, for other residential wells to be affected in the future.”

Chapter 4 - Lake Huron

4.1. Saginaw River and Bay AOC, Arenac, Bay, Clare, Genesee, Gladwin, Gratiot, Huron, Iosco, Isabella, Lapeer, Livingston, Mecosta, Midland, Montcalm, Ogemaw, Osceola, Roscommon, Saginaw, Sanilac, Shiawassee, and Tuscola Counties, MI

Table 4.1-A Hazardous Waste Sites in Counties Relevant to the Saginaw River and Bay AOC

Please change Berlin and "Farrow" to "Farro"

4.1.1.4 Berlin and Farrow

Please change Berlin and "Farrow" to "Farro"

4.1.1.7 Velsicol Chemical Corporation

Please change site size from 5 to 52 acres.

4.1.1.8 Hedblum Industries

Please remove the second period in the first sentence under the subheading "IJC Critical Pollutants Identified within ATSDR Documents".

Chapter 5 - Lake Michigan

5.1. Muskegon Lake AOC and White Lake AOC Muskegon County, MI

5.1.1.5 Muskegon Chemical

Please change the ATSDR Conclusion text to include the following information.

The third Five Year Review was conducted by U.S. EPA and MDEQ under the Superfund program and completed in April 2008. The remedy is functioning as intended and it is protective of human health and the environment.

Mill Pond Creek is no longer impacted from the Site. The groundwater risk pathway to aquatic benthic life is not a concern. Quarterly monitoring has confirmed that no release to the Pond has occurred since before 1994. Also, Mill Pond Creek was removed from the state's "non-attainment" list in 2003 which is the state's list of impacted surface waters, based upon results of a macro invertebrate study conducted in the creek in approximately 2001. Last, the fish studies never indicated any site-related problems existed even during the time when the highest contamination was detected at the Site and in the surface water.

Tier 1 soil remedial action goals (RAGs) have been achieved. Tier 1 (Site specific standards for protection of Mill Pond Creek) groundwater RAGs have been achieved through the vast majority of the plume.

5.1.1.11 Whitehall Municipal Well Site

Please change the ATSDR Conclusion text to include the following information.

In 1981, wells were found to be contaminated with tetrachloroethylene and trichloroethylene, and other chlorinated VOCs, but levels were low, and exposure was minimized by reducing the pumping rates, and ultimately by taking the wells off-line. Contamination of the monitoring wells was ~~is~~ sporadic. Although this municipal supply well contributed to human exposure to VOCs, it was not the source of contamination, which remains unknown. It has been taken off-line. Monitoring of the public water supply is conducted by the city.

5.3. Grand Calumet AOC, Lake County, IN, and Cook County, IL

5.3.1.3 Midco I

Please change the site history text to include the following information.

In 1982, U.S. EPA removed all of the surficial wastes from the Midco I. There were over 5,000 drums left on-site in addition to the 14,000 fire damaged drums. The quantities of wastes removed, can be found in the Region 5 NPL Fact Sheet. At the end of the removal action, EPA placed some clay soil over much of the site.

Please consider the following comments.

ATSDR Conclusions: ATSDR's conclusion that Midco I is a Category 2, Public Health Hazard, is very out of date. The area of contaminated soil and sediment is now fenced, the contaminated groundwater is being contained by a pump-and-treat system, and treatment of contaminated soils and groundwater is ongoing. There is no significant potential for human exposure, other than to on-site workers, who are protected by following a U.S. EPA approved Health and Safety Plan. If lead and cadmium were detected in a residential well, it is irrelevant to the assessment of Midco I risks because U.S. EPA did not find that Midco I was the source of this contamination. Access to Midco I was first restricted by U.S. EPA in 1981 (not 1998) when U.S. EPA constructed a fence around the site. This fence was extended in 1994 to include the contaminated sediment areas. Deed restrictions were put in place in 1992 – 1993. Air stripping was temporarily part of the groundwater treatment system and does not need to be mentioned. Design and implementation of soil and groundwater treatment has been proceeding since 1993. For more details consult the 2004 Second Five-Year Review Report. Note that the treated groundwater from Midco I is disposed by deep well injection.

IJC Critical Pollutants Identified within ATSDR Documents: Although a number of critical pollutants have been detected at Midco I, these no longer pose a significant threat to human health.

5.3.1.4 Midco II

Please change the site history text to include the following information.

U.S. EPA removed all surface wastes from Midco II, plus a sludge pit and filter bed between 1984 and 1989. The Region 5 NPL fact sheet has complete site information.

Please consider the following comments.

ATSDR's conclusion that Midco II has a Category 3, Indeterminate Health Hazard, is very out of date. The area of contaminated soil and sediment is now fenced, the contaminated groundwater is being contained by a pump-and-treat system, and treatment of contaminated soils and groundwater is ongoing. There is no significant potential for human exposure, other than to on-site workers, who are protected by following a U.S. EPA approved Health and Safety Plan. Access to Midco II was first restricted by U.S. EPA in 1981 (not 1998) when U.S. EPA constructed a fence around the site. This fence was extended in 1994 to include the contaminated sediment areas. Deed restrictions were put in place in 1992 – 1993. Air stripping was never part of the groundwater treatment system at Midco II. The contaminated residential wells located about ½ mile southeast of Midco II are not relevant to the assessment of Midco II because U.S. EPA did not find that Midco II was the source of the contamination. Design and implementation of soil and groundwater treatment has been proceeding since 1993. For more details consult the 2004 Second Five-Year Review Report. Note that the treated groundwater from Midco II is disposed by deep well injection. Historical releases of critical pollutants from Midco II did not impact Lake Michigan.

IJC Critical Pollutants Identified within ATSDR Documents: Although a number of critical pollutants have been detected at Midco II, these no longer pose a significant threat to human health.

5.3.1.5 Ninth Avenue Dump

Please change the text from "Since disposal operations were discontinued in 1980, drums of wastes, abandoned tanker trucks, and surface soils have been removed." to "After disposal operations were discontinued in 1980, drums of wastes, abandoned tanker trucks, and some surface soils were removed."

Please change the site information to explicitly state that the site is fenced.

Please change the text from: "Groundwater is contaminated, and flows north to discharge in Lake Michigan." to: "Groundwater on the site was found to be contaminated. The groundwater flows toward the north, but, for the most part, the contamination in the groundwater has not gone beyond the site boundaries. The Grand Calumet River is approximately 1 1/4 miles north of the site and Lake Michigan is approximately 3 1/2 miles north of the site."

Please consider the following comment.

Report mentions the 2003 USEPA NPL fact sheet for this site as one of the references. There is a more up-to-date fact sheet available, and that is what will be found if one looks for a fact sheet.

Please check the following contradiction.

Report has: "In the 1999 health consultation no category was reported." In Table 5.3 of the draft report, for the 1999 HC it lists a "5" for the ATSDR Hazard Category. This should be checked to see which of these statements is correct.

Please consider the following comment.

Report has: "PCBs, PAHs, VOCs, lead and chromium in on-site soils, food grown in the soil and sediment were of concern. A concern for bioaccumulation into fish (of chemicals such as PCBs) was expressed. If fish in the area were contaminated and eaten, this site may have contributed to environmental burden and human exposure to PCBs, PAHs, and lead." It should be made clear that what is stated here might be the case if the site was not remediated. Because of concerns like these, the site was remediated.

Report has: "Remediation was completed in 1995 with maintenance activities, including the installation of a slurry wall and access restriction, initiated in 2004." We do not know what is meant by ". . . maintenance activities, including the installation of a slurry wall and access restriction, initiated in 2004." Installation of a slurry wall is not a maintenance activity. Access restrictions have been in place since before 1990 when a fence was installed. We do not know what change was made in 2004 that this is referring to. Replace this sentence with: "Construction of the remedial action was completed in 1995. The remedial action included a slurry wall around the contamination to contain the contaminated groundwater, the removal of much of the light non-aqueous phase liquid that was floating on the groundwater, a multi-layer cap over the contaminated part of the site to isolate the contamination, and a soil-vapor extraction system to further remove contamination left at the site. The site is being maintained."

5.4. Waukegan Harbor AOC, Lake County, IL

Table 5.4-A Hazardous Waste Sites in Lake County, IL

Yeoman Creek Landfill site is listed on the final NPL.

5.4.1.2 H.O.D. Landfill

Please change the citations of NPL fact sheets from 2003 to 2008. The NPL fact sheets for H.O.D. Landfill, Antioch, IL has been updated recently.

5.4.1.3 Johns-Manville Disposal Area

Please consider the following comment.

The 1988 PHA indicated that inadequate air monitoring had been conducted to make a determination of the threat from the site. Air monitoring has been conducted since 1988 during the remedial response activities at the site.

While the document adequately describes most of the response actions taken at the site since the 1988 PHA, it fails to note that response actions are also in progress to address the former wastewater areas and several areas near the site, and focuses more discussion on the results of a PHA written 20 years ago than on current site conditions.

5.4.1.7 Yeoman Creek Landfill

Please change the site history text to include the following information.

The Yeoman Creek Landfill Superfund Site now consists of two capped areas, Yeoman Creek Landfill and Edward's Field Landfill. The creek dividing the east and west portions of Yeoman Creek Landfill is Yeoman Creek, not Yeoman's Creek.

5.5. Milwaukee Estuary AOC, Milwaukee County, WI

Table 5.5 -A Hazardous Waste Sites in Milwaukee County, WI

Please change the table text to include the following information.

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The most recent health consult was completed April 2008 for the Solvay Coke Site.

5.5.1.2 Fadrowski Drum Disposal

Please change the site history text to include the following information.

This 20-acre site is located in the city of Franklin, Milwaukee County, WI. The site was operated as a landfill for construction debris and fill dirt from 1970 to 1982. In 1983, however, excavation for fill dirt on the property revealed barrels of hazardous wastes. Some of the barrels had ruptured during the excavation.

5.5.1.6 Moss American Site

Please change the site history text to include the following information.

Significant work to address contaminated soils and groundwater, in addition to sediments has been completed. The contaminants of concern, which formed the basis for the baseline risk assessment, were 8 carcinogenic PAHs (CPAHs). Although dioxin,

phenolic compounds, and metals were detected, these other contaminants really had minimal impact on risk at the site, relative to the CPAHs. Sediment sampling of the last segment of the river is underway. Dredging of contaminated sediments, identified through sampling data, is expected to be completed later this year or early next year

5.5.1.14 Solvay Coke Brownfield, Milwaukee,

Please remove the word "Brownfield" from the section heading and elsewhere in the document.

Please change the 3rd paragraph of the site history text to include the following information.

The April 2008 consultation changed the distance to the nearest residential neighborhood to "650 feet" from 1800 feet.

5.7 Lower Green Bay and Fox River AOC

Please change the ATSDR Conclusion text to include the following information.

Initial remediation of PCB-contaminated sediment, dredging began in 1999. Dredging, capping and sand covering is on-going.

5.8.1.2 Marinette Sewage Treatment Plant/Marinette Manufactured Gas Plant Brownfield Remediation.

Please remove the word "Brownfield" from the section heading and elsewhere in the document.

Please change the ATSDR Conclusion text to include the following information

Planning for the RI/FS is ongoing. No remediation has been selected to date.

Please consider the following comment.

The ATSDR Conclusions text discusses a remedial design and talks about potential risk from exposure to dredge spoils and associated contaminants. At one time, before the Superfund settlement, there was a remedial design for sediment removal. That design was never implemented because of concerns over cleanup goals. At this time, the site has no approved design and is in an investigation mode.

Chapter 6 - Lake Superior

6.2. Torch Lake AOC, Houghton County, MI

6.2.1.1 Torch Lake

Please consider the following comment.

It may be useful to distinguish the NPL Operable Units (OUs) at the site, or how they related to the AOC. OU1 includes stamp sands and tailings, slag and drums along the western shore of Torch Lake, OU2 includes groundwater, surface water and sediments associated with the site, and OU3 includes several other areas with stamp sands on the Keweenaw Peninsula.

The 1995 Site Review and Update by ATSDR are not referenced in the summary. This report concluded that further analysis and evaluation of site data should be conducted to determine whether follow-up health activities are needed. In reference to the 1998 PHA, EPA's OU1 and OU3 remedial actions included institutional controls to limit exposures to surface contaminants at the site

Recommend noting that "A removal action is also underway to address asbestos at the Quincy Smelter." in the second and third paragraphs under ATSDR conclusions.

Recommend revising the last sentence in the third paragraph under ATSDR conclusions from "This means that all planned remedial activities under the Superfund program have been completed." to "All planned remedial activities under the Superfund 1992 Record of Decision have been completed, however additional activities may be needed in Operable Unit 3 of the site."

Appendix 1

The Liquid Disposal Inc. site does not appear on the Clinton River AOC Map. There are two J&L landfills illustrated, perhaps one site is mislabeled. Liquid Disposal is located just east of the county line at 3901 Hamlin Road in Utica, Michigan.