

From: [Boughton, Lori A](#)
To: [Great Lakes \(CDC\);](#)
cc: [Booser, John;](#)
Subject: Comments on ATSDR draft report re Great Lakes Areas of Concern
Date: Thursday, June 26, 2008 12:17:19 PM
Attachments: [ATSDR Report Comments.doc](#)



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Office of the Great Lakes

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June 26, 2008

Ms. Olga Dawkins
Agency for Toxic Substances and Disease Registry
Division of Toxicology and Environmental Medicine
1600 Clifton Road, NE
MS F-32
Atlanta, GA 30333

Dear Ms. Dawkins:

On behalf of Pennsylvania's Office of the Great Lakes, I have reviewed the draft report "*Selected Information on Chemical Releases Within Great Lakes Counties Containing Areas of Concern (AOC)*". I have a few general comments on the report and some specific comments and updates on the information pertinent to Pennsylvania's only AOC, Presque Isle Bay. Please note that several months ago when this report and its findings were the subject of an Associated Press (AP) article, local citizens were very concerned about the information it contained.

My main criticism with the report is that the information it based on is old and in the case of Pennsylvania, no longer accurate as facilities have been cleaned up. I know it is hard to issue a report that is current, but the data used in this report is ten years old or more in some cases. The Toxic Release Inventory data is from 2001. At least one of the facilities listed has been closed for the past five years. This issue is acknowledged in the Preface yet the dated information is still presented in the sections on the individual AOCs. In many cases, those sections of the report are the only part people will read.

A second concern is the decision to look at data from AOC counties. The report's Executive Summary even states that the "Much of the available data pertain to counties, and not to the AOCs". No explanation is provided that shows how to connect the county data with AOCs other than the close geographical proximity. This approach has many flaws. There is no discussion of how these discharges impact the AOC. In the discussion on Presque Isle Bay, for example, no connection is made between these discharges in the county and beneficial use impairments in the AOC. I would think that to be critical to the relevancy of the report. Air emissions for the Pennsylvania sites as well as the permitted discharges are within permit limits. The permits are based on federal laws. The implication is that the government is allowing and permitting discharges of critical pollutants in amounts harmful to human health.

I think a more accurate approach would be to focus on discharges and releases in the AOC watershed. This is particularly true for Presque Isle Bay. None of the "hazardous waste" sites are in the bay's watershed. One in fact, Foamex Products, is more than 50 miles from the bay and not even in the Lake Erie watershed. While the report preface does state "...it is impossible to draw conclusions about the threat to human health from critical pollutants across the Great Lakes Basin." people reading the report will draw conclusions. Issuing the report with dated information based on sites that do not currently pose a threat or

impact on the AOC will result in erroneous conclusions. I have seen that first hand when the AP article was issued.

Finally, the report's recommendations are a list of data and monitoring needs to accurately assess the current impact on human health. What then is the point of detailing for each AOC possible impacts based on data that is ten to twenty years old?

In addition to these general concerns with the report, I am attaching updates on the hazardous waste sites and other discharges in the Presque Isle Bay AOC County. I urge you to update the information and analysis using current data, make some connection between discharges in the county and impact on the AOC focusing on the beneficial use impairments, and state in the beginning of each section the relevance of ATSDRs Hazard Category assignments today when that assessment was done prior to the remediation of a site.

Thank you for the opportunity to comment on this draft report. If you have any questions about my comments and concerns, please call or email me (lboughton@state.pa.us).

Sincerely,

A handwritten signature in black ink that reads "Lori Boughton". The signature is written in a cursive style with a large, prominent initial "L".

Lori Boughton, Chief
Office of the Great Lakes

Cc: John Booser
File
Attachment

Attachment to Pennsylvania's Office of the Great Lakes Comments

Updates to Section 3.2.1

Foamex Site – recommend this facility is deleted from the report or the potential impact of its releases on the AOC be shown. Also need to address how meeting the permit limits for discharges has a negative impact on human health.

The Department of Environmental Protection's Air Quality program inspected the facility in December 2007 and found no violations. As mentioned in the report, in 2003 Foamex stopped using Methylene Chloride, a known carcinogen, as the blowing agent used to create the bubbles in the foam. Foamex completed a 100% substitution of the Methylene Chloride with Carbon Dioxide. This represented a reduction in air pollution of over 600 tons per year from previous years. Erie County went from being near the top of the list of releases of known carcinogens to the air to not "making the list" because of this one change by Foamex.

Hammermill Scott Run site – recommend updating this section to show that it no longer poses a threat and possibly deleting it from the report as any discharges were not to the AOC watershed. This site is reported as having ongoing remedial activities and considered a Category 2 public health hazard based on data from 1998. It is stated that the state committed to conduct additional clean up activities. That is true and the site has been clean closed. The owner of the site, International Paper, removed all of the drums and impacted soils, identified a Mercury issue in the wetlands at the site, removed the mercury-contaminated media and restored the site. Monitoring is ongoing to ensure the wetlands are established and maintained. This site is no longer releasing any contaminants.

Lord-Shope Landfill – This landfill site is located in Girard Township, which is not in the Presque Isle Bay watershed. In 1982, Lord Corporation (a site responsible party), removed 81 exposed drums of waste, installed a composite cap over the landfill, and installed a low permeability groundwater cutoff wall upgradient of the landfill. Lord Corp. then selected a remedy consisting of a groundwater pump and treat system in conjunction with an in-situ vapor stripping system. Remedial activities were completed in August 1996. The site is currently in the Operation and Maintenance (O&M) phase.

Millcreek Dump - This site is located in Millcreek Township, discharging to Marshall Run, which is also not in the AOC watershed. EPA completed construction of a groundwater treatment system at the site in 1992. Construction of a cap, a golf course, wetlands and a flood retention basin was completed in September 2001. A nine-hole golf course was built over the former industrial and municipal waste dump. The final inspection and grand opening of the golf course was in June 2002. A five-year review was conducted in July 2007. The Department of Environmental Protection assumed operation and maintenance of the treatment plant in October 2007 and continues to monitor.

The International Paper facility, which is included in the TRI data shut down its operations several years ago. Including it in this report paints an inaccurate picture of air emissions. This facility should be removed.

