

## Response to the Public Comment Version of the Groundwater Monitoring Review Prepared by the Pennsylvania Department of Health

Comment Prepared by the HERS Working Group on Behalf of the Bo-Rit Community Advisory Group (CAG) and presented to the CAG Meeting of October 3, 2012

### **Preamble and Introduction**

The HERS working group of the CAG welcomed and was pleased to be able to review the Groundwater Monitoring Review Public Comment Version. Over the last several years there has been considerable concern expressed by various CAG members about the potential for contamination of public water and drinking water sources, and of private wells by contamination with pollutants from the Bo-Rit site.

The comments below were prepared by HERS working group members. Several members of the CAG contributed. The HERS and the RR&M working groups held a joint conference call at which the document was discussed. Comments from that conference call are reflected in the commentary below. Several members of the HERS working group are employees of State and Federal Agencies. Because of conflict-of-interest concerns they did not participate in developing or submitting these comments.

The HERS and RR&M working groups found the analysis presented in the Review of Preliminary Phase II Groundwater Report presented to the CAG by J Stuart Wiswall P.G. TASC (Technical Assistance Services for Communities) Technical Advisor to the CAG to be very useful. We commend this report to the PA Department of Health for further understanding of groundwater contamination issues of concern to the community. We recognize that Mr. Wiswall's report was not available in time to be included in the Review initially conducted by the State.

This response is presented with general points first. Additional individual comments from CAG members are then attached as an appendix. Some of these individual comments may have already been submitted in individual responses to the request for public comment. They are included here for completeness.

### **General Comments**

1. The Groundwater Monitoring Review, Public Comment Version concluded that "the groundwater underneath the site does not appear to influence the public drinking water sources" and that "contaminants in groundwater from this site do not represent a completed pathway for this community". However the report by Mr. Wiswall indicates that while no contamination of the Ambler Public water system wells has been demonstrated there is "insufficient data to make a definitive statement about the lack of connectivity between the groundwater under the site and the Ambler public water system wells. Mr. Wiswall has

- recommended further tests that would better establish the assumed lack of connectivity. We strongly suggest that the EPA perform further testing as recommended by Mr. Wiswall, or alternative testing which would provide proof of lack of connectivity for future water supplies to at least the same level of certainty. The HERS working group notes that this request has already been submitted to EPA by the CAG Co-Chairs.
2. Levels of manganese were detected in water samples from monitoring well 3 and also from number 5 and 6 piezometer well samples at levels well above the EPA lifetime health advisory levels for drinking water. The very high level of manganese in samples from multiple wells appears to make it very unlikely that this is a chance finding. In view of recent studies of health effects from occupational manganese exposures we request that the PADOH specifically comment on the potential health significance of the levels of manganese in the survey wells.
  3. The HERS subgroup strongly concurs with the recommendation that EPA conduct a private well-water survey near the site to identify any private well-water users who might be impacted by site-related contamination. We would hope that the relevant municipalities would help publicize efforts in this regard. The HERS working group suggests that the CAG may be able to help publicize actions which responded to the recommendation.
  4. The HERS working group notes that in addition to any risks that might follow from ingestion of asbestos from dietary water, the presence and use of water containing asbestos for private or commercial purpose could result in airborne asbestos fibers remaining after the water has evaporated. Since inhalation of airborne asbestos is known to be harmful we would like this possibility evaluated in the analysis of risks from contaminated water.
  5. Working group members did note that, as expressed in the report, there are many gaps in the data bases used by the state, including no testing of potentially important contaminants for a number of years. Although we do not believe that these data gaps are likely to be filled, CAG members feel it is important that uncertainties resulting from these data gaps continue to be acknowledged.

Respectfully submitted

Edward A Emmett, Chair HERS Working Group  
September, 2012