

**CAG Response
To the Proposed Plan
for the 57th and North Broadway Superfund Site**

September 10, 1999

The CAG is pleased the EPA is moving toward active treatment and cleanup at the 57th and N. Broadway Site. The community favors use of an aggressive treatment and monitoring system. They want assurance that public water supply wells and private wells will not become contaminated, and that if new contamination or migration of the plume is discovered, additional remediation will occur. In particular there is concern about the Bel Aire well field.

The purpose of the EPA remedial action is to protect the public health and safety. At this site, the primary source of exposure to contamination has been from contaminated drinking water. While the present exposure to contaminated water has been reduced or eliminated, there is a risk of future exposure as long as some residents use private wells and public water supply wells are used for the community water supply. The community needs to have a high level of confidence in its water supply. This will come from monitoring the groundwater, eliminating potential sources of groundwater pollution, and providing treatment of water to insure exposure is prevented.

The CAG continues to have concerns about the following issues:

1. Monitoring of plume to determine if new exposure or danger of exposure exists.

- a. The CAG is concerned there is not an adequate number of monitoring wells planned to protect the Bel Aire well field. The CAG noted that in the revised Feasibility Study dated May 1999, section 3.2.5 Groundwater Alternative 5, the following sentence was deleted from the draft. "It was assumed for the purpose of developing this alternative that two new nests of monitoring wells would be installed." The CAG believes that it is not acceptable that monitoring wells would be eliminated when we should be adding more. One specific suggestion by the CAG is to place one or more additional nested monitoring wells between the floodway and the Bel Aire well field. One location might be near borehole B263. The CAG also suggests that the Bel Aire PWS wells be sampled as part of the monitoring program. Although these wells are periodically tested for contaminants, it is not done at the frequency that would be done with quarterly monitoring.
- b. The community requests the ROD (Record of Decision) includes a clear monitoring schedule, presumably on a quarterly basis. The ROD should also clearly state how the community would be informed of the results of groundwater monitoring on a regular basis. The CAG understands that the monitoring program will proceed irrespective of the funding mechanism for the final cleanup, so there will not be a delay in establishing the monitoring system and schedule.

- c. The CAG understands that several residential wells in the Riverview area will continue to be monitored near the border of the plume. The CAG believes residential wells on the both the east and the west side of the plume should be monitored. The CAG prefers to be very cautious in defining the edge of the plume to prevent the potential for exposure to the community in the future. Even though monitoring will continue to take place, the frequency of monitoring and placement of monitoring points will not be sufficient to detect small changes in the plume and random variations in sample results. The community must live with this uncertainty and therefore prefers that a larger buffer area be used. If, for example, a residence has a reading of 0.3 of the MCL for a compound, members of the CAG think it is likely that due to variation in sampling, such a residence will be above the MCL some of the time. Members of the CAG feel strongly that these residences should be hooked up to the public water supply.

2. Additional sampling required at Midland refinery.

The CAG supports the need for additional soil sampling at the Midland Refinery to determine if there are still existing sources of soil and groundwater contamination. The statement of the need for this sampling is not detailed in the Proposed Plan. The CAG would like to know that this sampling will be required on a timely basis regardless of how the final cleanup is funded. The CAG would like the ROD to specify the requirements for the soil sampling or the process and schedule that will be used to determine the sampling work plan. If additional sources of contamination are located the CAG expects appropriate remediation would take place.

3. Action plans if monitoring shows continued spread or movement of contaminated groundwater.

The CAG would like to know what specific actions would be taken if the monitoring results show a change in the pattern of contamination. The CAG believes the following actions should be taken.

- a. Bel Aire Well Field: If monitoring wells upgrading of the Bel Aire well field have detectable contamination (for example, locations B263, MW307, MW313, and MW312), then a separate removal action and operable unit should be created to protect and treat the public water supply wells.
- b. Riverview: If there is a residential well in or near the current Riverview buffer zone that shows detectable contamination, then the residence should be connected to the public water supply and the buffer zone should be expanded to include the next nondetect residence to prevent additional exposure potential.

4. Selected clean-up technology.

- a. The CAG would like an aggressive technology selected to clean up the contaminated groundwater. Concern has been raised about whether a 'proven'

pump-and-treat type system would be more aggressive or effective than an 'unproven' in-well vapor extraction system, especially in the northern plume area that is not in a residential community and where there are concerns about migrating contamination reaching the Bel Aire PWS. CAG members noted Alternative 6, In Situ Vapor Extraction, is not a proven technology, especially with the hardness of this groundwater, and the Proposed Plan stated that it was not a proven technology (i.e., "With the exception of Alternatives 2,4,6, and 7, all the alternatives are proven and reliable."). EPA began to address this issue at the August 5, 1999 CAG meeting, but it would be helpful to have this discussion in the responsiveness summary.

- b. A test unit for the in-well vapor extraction system has been installed in the Riverview neighborhood. The CAG would like EPA to present the results from that test and explain how that information will be used to design a treatment system for the whole site. CAG members had several specific questions and concerns regarding iron content of the aquifer and the potential for screen plugging. Will both the upper and lower screens in the recirculation well remain unplugged over a long period of time? How is this tested? How do you determine how much water is actually circulating in the system?

5. Potential future need for a water treatment facility.

In the view of the community, it is difficult to separate exposure to contaminated water from the Superfund site and all other sources of contamination in the area. The community needs to have a high level of confidence in its water supply for present and future development. In light of the multiple sources of present and potential future contamination, it may be prudent to build a water treatment facility for treatment of water from the public water supply wells to reduce future exposure risks. Although funding for such a facility would come from multiple sources, all parties that have contributed to contamination of groundwater in the area bear some responsibility for this need. While the need for a water treatment facility is still under consideration, the community would like the ROD to state that a portion of the need for this facility would rest with the parties responsible for contamination and cleanup of groundwater at the 57th and North Broadway Site.

6. Health education/physician training.

The community has continuing concerns about the need for health education and physician training regarding the health effects of exposure to contaminated drinking water. While ASTDR has been involved in some physician training, the community is still not satisfied that enough information has been properly communicated to both physicians and the local residents. While the CAG appreciates the EPA is responding to this need, it would be helpful for the EPA to explain what will be done to insure adequate health education is accomplished. The residents need to know who the trained physicians are and where they can seek answers to their questions concerning exposure risks and health concerns in the community.

7. Schedule of activity once the ROD is signed.

Please explain the sequence of events to follow the signing of the Record of Decision. How soon will cleanup activities begin? Will cleanup begin right away or will cleanup be put on hold while EPA pursues PRP funding? The CAG understands that clean up in the Riverview area will continue regardless of the funding of the area wide clean up. The CAG also expects the groundwater-monitoring program will put in place. The community would like to see separate schedules for monitoring, implementation of the Operable Unit 2 ROD (the Riverview area), and the procedure for implementing the Operable Unit 1 ROD (the area wide record of decision).

The CAG appreciates the EPA has addressed some of these issues in at meeting on August 5, 1999. It would be helpful for the explanations to be available to the whole community.

Respectfully Submitted,

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Chair
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Citizens Advisory Group