

Horsham Water & Sewer Authority

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ECP/WASTE MGMT

October 29, 2012
Via Electronic Mail & Facsimile

Carly S. Baker, Solid Waste Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Re: Limekiln PCE HSCA Site Investigation
Horsham Township
Montgomery County, PA

Dear Carly,

The Horsham Water & Sewer Authority (HWSA) offers the following comments to be entered into the Pennsylvania Department of Environmental Protection's (PA DEP) administrative record docket of the Limekiln Pike PCE Hazardous Sites Cleanup Act (HSCA) Site (area of groundwater contamination located on the USGS 7.5 minute series Ambler, PA Quadrangle Map at 40°12' north latitude and 75°11' west longitude) Investigation in Horsham Township:

HWSA Well #19, Entry Point 111

HWSA's largest producing well, Well 19 is located less than 2000' south of the Limekiln PCE Site. Well 19 alone, produces approximately 13% of Horsham Township's total average daily demand.

HWSA recognizes and supports the immediate need to implement a response action such as installation of a public supply water line at the Site to address threats to human health resulting from the contamination. However, beyond the immediate response action, HWSA strongly encourages DEP to continue to exercise its authority under HSCA and pursue further investigation into the source of the contamination as well as remediation efforts to prevent the contamination plume from moving in the direction of Well 19.

If public water is installed at this Site, Well 19 will serve as the primary source of supply to the residents in the area of the Site. As mentioned by DEP at the public meetings, the permanent abandonment of numerous private wells at the Site will likely allow the plume of contamination to move and HWSA believes that the most likely path of contaminant migration would be down gradient towards a large pumping well such as Well 19. If treatment for VOC's becomes necessary at Well 19, the Authority estimates that cost, in today's dollars, at \$600,000. This is exclusive of additional operational, maintenance, and compliance monitoring costs.

HWSA anticipates that Park Creek may play a role in diverting part of the plume before it reaches the well, but we do not expect that the creek will provide an impermeable barrier from the contamination since chlorinated solvents tend to descend deep within the aquifer, thereby allowing at least some of the contamination to pass beneath the stream.

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HWSA requests copies of all plans DEP may be considering relative to remediation at the Site, along with copies of all supporting reports for the contamination investigation to date. HWSA further reiterates its request that DEP continue its investigation to include an assessment of the long term potential impacts of this contamination on Horsham Township's public water supply, specifically Well 19, and an evaluation and recommendation of preemptive measures that may be taken to prevent plume migration. In addition, please be advised that HWSA preserves any and all remedies available to it relating to the contamination of the public water supply including but not limited to the ability to recover costs associated with the monitoring, prevention, and treatment of such contamination.

Installation of public sewers

Assuming the installation of public water is selected as the immediate response action HWSA reinforces its desire to investigate the possibility of installing public sewers at the same time. As we discussed at our meeting of September 25, 2012, DEP has no objections to the joint installation of public sewer provided that it does not impact the allotted time frame for completion of the water installation. To date, 24 surveys have been disseminated. Of the 14 respondents thus far, 8 are in favor of sewer installation. HWSA will continue to assess the community's desire for public sewers and preserves the opportunity to install sewers in the event water is installed.

Thank you for the opportunity to comment.

Very truly yours,

Tina M. O'Rourke
Business Manager

TMO/sd

cc: Board Members
Paul G. Mullin, Esquire
William N. Malin, P.E.
William T. Walker, Township Manager
Honorable Todd Stephens, State Representative
Timothy Cherry, Supervisor, Hazardous Sites Cleanup Program
Ragesh R. Patel, Environmental Group Manager ✓
Steven A. Hann, Esquire