

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Hazardous Sites Cleanup Program

RESPONSE TO PUBLIC COMMENTS

Midfield VOCs HSCA Site

June 5, 2014

The Pennsylvania Department of Environmental Protection (Department) provided a public comment period concerning the selection of the interim response at the Midfield VOCs HSCA Site. Written comments were accepted during the comment period which ended on May 24, 2014 and oral comments were presented at the public hearing conducted on April 7, 2014 at the Horsham Township Community Center. The Department has compiled all comments received during the comment period or at the public hearing, from the following persons:

John Burke
307 Midfield Drive
Ambler, PA 19002

Ted DeLeone
308 Midfield Drive
Ambler, PA 19002

Jim Vasta
300 Park Road
Ambler, PA 19002

Karina Caddick
315 Midfield Drive
Ambler, PA 19002

Walt Badulak
1035 Davis Grove Road
Ambler, PA 19002

Peter Tambourino
317 Midfield Drive
Ambler, PA 19002

Richard Jushchyshyn
304 Park Road
Ambler, PA 19002

Mary Ann Grucella
1030 Davis Grove Road
Ambler, PA 19002

Robert V. and Suzanne Davenport
306 Midfield Drive
Ambler, PA 19002

William Walker
Township Manager
Horsham Township
1025 Horsham Road
Horsham, PA 19044

Tina O'Rourke
Business Manager
Horsham Water & Sewer Authority
617 Horsham Road
Horsham, PA 19044

Representative Todd Stephens
151st Legislative District
PO Box 202151
Harrisburg, PA 17120-2151

Each comment, the source of the comment, and the Department's response are listed below. Oral comments have been summarized; complete transcriptions of oral comments can be found in the public hearing transcript of April 7, 2014, filed within the administrative record. Copies of the administrative record are available for review at the Department's southeast regional office in Norristown, and at the Horsham Township Library.

Comment #1: Oral comment from John Burke given at the public hearing on April 7, 2014, transcribed on page 28 of the hearing transcript, summarized below:

Mr. Burke stated that when the Department first sampled his well, on March 11, 2013, there was only one volatile organic compound (VOC) detected, but repeat testing nine months later revealed “three others”. He is concerned his results could get worse, like his neighbors, and stated that his well “is not a healthy well”.

Response to comment #1:

Thank you for attending the public hearing, and providing a comment for the record. The Department has selected Alternative 4, the extension of the nearby public water line in order to abate the threats posed by groundwater contamination. Selected properties in the Site area that are currently affected by VOCs above drinking water health standards as well as properties with detections below standards will be included in the project. The Department will perform additional sampling to monitor properties where to date, VOCs have been detected at levels within safe drinking water standards. Any residence with VOCs detected above standards during the investigation will be provided with bottled water until connections to public water are completed.

Comment #2: Oral comment from Ted DeLeone given at the public hearing on April 7, 2014, transcribed on pages 28-29 of the hearing transcript, summarized below:

Mr. DeLeone is receiving bottled water from the Department since he has a contaminated well, and expressed that he is “tired of bottled water”. He wants the water main put in, and believes “everybody on the street does”.

Response to comment #2:

Thank you for attending the public hearing, and providing a comment for the record. While it may be inconvenient to store and use, the bottled water does meet safe drinking water standards, and is only a temporary measure to ensure a safe alternative potable water source for affected homes. As a more permanent solution, the Department has chosen Alternative 4, the waterline option, for the Site. The Department will continue to provide the bottled water for homes with well-water contaminants that exceed safe drinking water standards until the response action is complete.

Comment #3: Oral comment from Jim Vasta given at the public hearing on April 27, 2014, transcribed on page 29 of the hearing transcript, summarized below:

Mr. Vasta is receiving bottled water from the Department, and stated “I really like my well”, but added “if I can’t drink it, what’s the point?”. He finds the bottled water “somewhat cumbersome”. He also thanked the Department “for even doing this study”. He looks forward to public water.

Response to comment #3:

Thank you for attending the public hearing, and providing a comment for the record. The Department has selected Alternative 4, the water line option. While there may be some inconvenience with the use of

bottled water, it is only a temporary measure until the response action can be completed. Once homes are connected to the water line, wells will be decommissioned and the bottled water will no longer be needed.

Comment #4: Oral comment from Karina Caddick given at the public hearing on April 27, 2014, transcribed on page 30 of the hearing transcript, summarized below:

Ms. Caddick is concerned that although her well isn't contaminated with VOCs above safe drinking water standards at this time, it could become so, since she lives so close to a property that is "very highly contaminated".

Response to comment #4:

Thank you for attending the public hearing and providing a comment for the record. The Department has selected Alternative 4, the public water line option, as a permanent solution to provide safe drinking water at the Site. The Department will also continue to monitor drinking water wells in the area while the water line project is designed and implemented. Bottled water will be provided to any residence that is found to have VOCs in the well water above safe drinking water standards during the investigation. Once the water line is complete, and homes have been connected, private wells will be decommissioned.

Comment #5: Oral comment from Walt Badulak given at the public hearing on April 27, 2014, transcribed on page 30 of the hearing transcript, summarized below:

Mr. Badulak stated he is downhill from other contaminated homes in the area, and he wants to "get tapped in" to the public water. He further explains he was "left out" of the nearby waterline project conducted previously for a separate, but similar, Site.

Response to comment #5:

Thank you for attending the public hearing and providing a comment for the record. While your property was not included in the nearby Limekiln PCE Site, it is included in the Midfield VOCs Site. The Department has chosen to enact Alternative 4, the water line option, and the Badulak property will be included in the project.

Comment #6: Oral comment from Peter Tambourino given at the public hearing on April 27, 2014, transcribed on page 31 of the hearing transcript, summarized below:

Mr. Tambourino's well has low-level detections of VOCs, and has "been fluctuating up and down." He stated he is "definitely in favor of public water", and thinks the "whole community needs it".

Response to comment #6:

Thank you for attending the public hearing and providing a comment for the record. The Department has selected the waterline alternative in order to abate the health risks posed by the groundwater contamination at the Site. Wells in the Site area will be sampled again while the Department plans the

waterline project, and if VOCs are found above any safe drinking water standard during that time, the Department will provide bottled water as a safe alternative drinking water source.

Comment #7: Oral comment from Richard Jushchyshyn given at the public hearing on April 27, 2014, transcribed on page 31 of the hearing transcript, summarized below:

Mr. Jushchyshyn thanked the Department for their work at the Site, and stated “my family stands in favor of a public waterline.”

Response to comment #7:

Thank you for attending the public hearing and providing a comment for the record. The Department has selected the waterline option as a response action to abate health risks posed by the contaminated groundwater at the Site.

Comment #8: Letter via email from Mary Ann Grucella:

April 10, 2014

Carly Baker
Solid Waste Specialist
PA Department of Environmental Protection
2 East Main Street
Norristown, PA 19401-4915

RE: **Public Hearing - Midfield VOC HSCA Site**

Dear Carly,

I attended the above public hearing this week and would like to enter the following statement into the official hearing record.

My name is Mary Ann Grucella and I reside at 1030 Davis Grove Road, Horsham Township, PA. My water has been tested and determined to be within acceptable levels at that time. However, I am very concerned about the consequences of wells being capped on Midfield Drive and the future impact on my well, as I understand it can often lead to contamination of other wells. This is of particular concern as I live downhill from Midfield Drive. I understand from the public hearing presentation that I may not be included in public water line plans. I request that I officially be added due to the above reason. I am highly in favor of public water lines and would want to hook up.

Thank you,

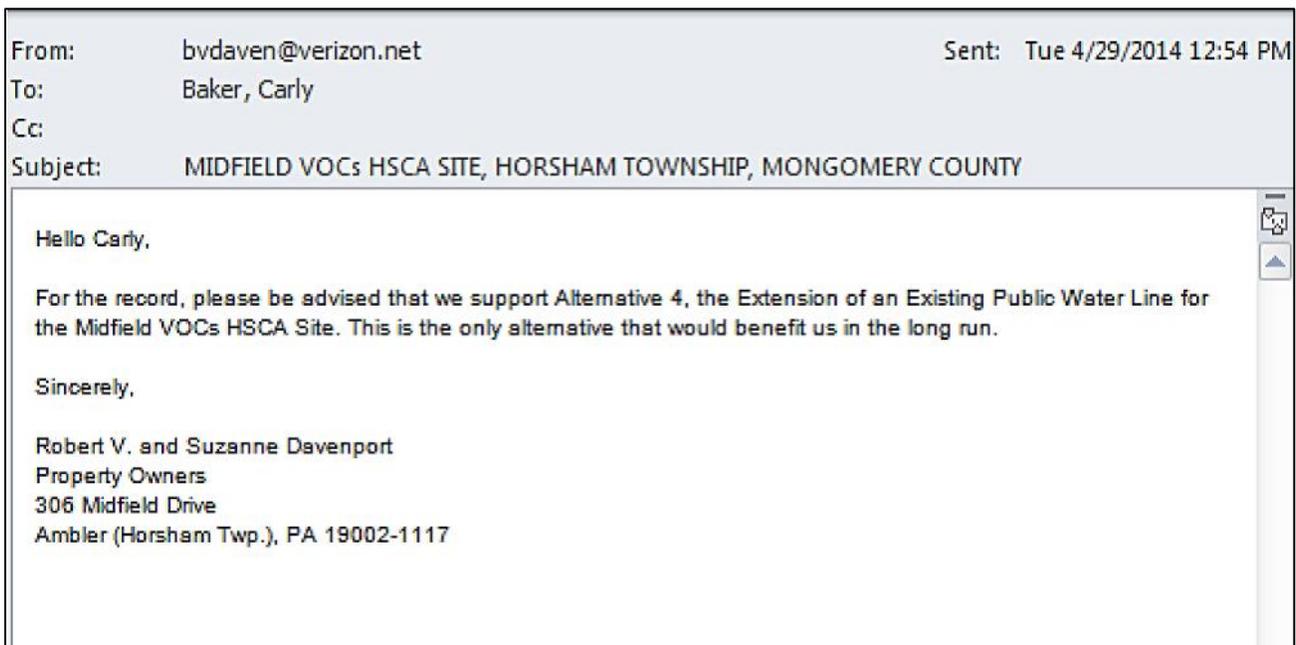


Mary Ann Grucella
1030 Davis Grove Road
Ambler, PA 19002
Phone: 215-646-7998

Response to comment #8:

Thank you for your comment. The Department has selected the water line alternative as a response action to abate the groundwater contamination in the Site area. Properties that are currently affected by levels of VOCs either above or below safe drinking water standards within the immediate Site area will be connected to the nearby public water line. Additionally, properties that are likely to become contaminated due to changes in groundwater conditions resulting from the cessation of groundwater well pumping will also be included. Although the details of the waterline have not yet been established, the Department anticipates including your property in the waterline project.

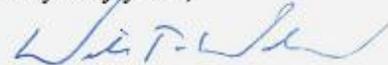
Comment #9: Email from Robert V. and Suzanne Davenport:



Response to comment #9:

Thank you for your comment. The Department has selected Alternative 4, the extension of the nearby public water line, in order to abate the threat posed by groundwater contamination.

Comment #10: Letter from William Walker, Horsham Township Manager:

| | | |
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| HORSHAM TOWNSHIP |  | 1025 HORSHAM ROAD |
| WWW.HORSHAM.ORG COUNCIL MARK McCOUCH, PRESIDENT DEBORAH M. TUSTIN, VICE PRESIDENT TOM JOHNSON GREGORY S. NESBITT W. WILLIAM WHITESIDE | | HORSHAM, PA 19044 |
| | | 215-643-3131 PHONE 215-643-0448 FAX |
| | | WILLIAM T. WALKER TOWNSHIP MANAGER RICHARD SABOL FINANCE DIRECTOR |
| May 13, 2014 | | |
| Ms. Carly S. Baker, Solid Waste Specialist PA Dept of Environmental Protection Southeast Regional Office 2 E Main Street Norristown PA 19401 | | RECEIVED 14 MAY 15 PM 1:30 RECEIVED ECP/WASTE MGMT DEP-SERO |
| <u>RE: Midfield VOCs HSCA Site – Horsham Township</u> | | |
| Dear Ms. Baker: | | |
| It is our understanding that the PA Department of Environmental Protection is currently accepting public comment on the Midfield VOCs HSCA Site in helping make the decision whether to install carbon filters or public water line. The comment period began on February 22, 2014 and ends on May 24, 2014. | | |
| Please consider this letter Horsham Township's whole-hearted and strong support for the water line option. We certainly applaud your office for all your work on the investigation. We would encourage the Department of Environmental Protection to approve the public water line option. There is definitely the need for public water in this area. | | |
| If you need any further explanation and/or information please do not hesitate to contact me at 215-643-3131. Thank you for your consideration of our request. | | |
| | Very truly yours, | |
| |  | |
| | William T. Walker Township Manager | |
| Cc: Members of Council Ms. Tina O'Rourke, HWSA Manager PA Rep. Todd Stephens, 151 st District PA Senator Stewart J. Greenleaf, 12 th District | | |

Response to Comment #10:

The Department appreciates the comment and thanks the Township for their cooperation throughout the investigation process. The Department has selected Alternative 4, the installation of a public water line, as a response action for the Site.

Comment #11: Letter from Tina O'Rourke, Business Manager, Horsham Water & Sewer Authority:

Horsham Water & Sewer Authority
www.horshamwater-sewer.com



617 Horsham Road • Horsham, PA 19044
PHONE: 215-672-8011 • FAX: 215-672-8065

May 14, 2014

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

Re: Midfield Drive VOC HSCA Site
Horsham Township
Montgomery County, PA

RECEIVED
DEP-SERO
ECP/WASTE MGMT
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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 Midfield Drive VOC Hazardous Sites Cleanup Act (HSCA) Site.

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. Beyond the immediate response action, since Horsham's public water supply is entirely groundwater, HWSA also 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 spread of the contamination plume to the Authority's public supply wells.

The Authority is a strong proponent of safe drinking water and strongly endorses the extension of the public water system as needed throughout the Midfield VOC's HSCA Site area. While the Authority is extremely sensitive to the property owners who have been subjected to this contamination, the Authority has an equal sensitivity, and obligation, to its existing rate payers.

As you know, the Midfield VOC's HSCA Site is the second site in Horsham Township within the past three years in which drinking water wells have been found to be contaminated. Public water has recently been installed to the Limekiln Pike PCE site and the Authority is currently in the process of connecting thirty four properties to the public water system. The Pennsylvania Municipal Authorities Act established the ability for Authorities, such as HWSA, to charge tapping fees for connection to the public water system. As they are intended, these fees are relied upon to support the upkeep of the Authority's infrastructure, whereas user charges generally support the Authority's operational costs to provide service. The Limekiln site area connections would generate \$121,000 in desperately needed tapping fees for the Authority. Connection of the thirty properties in the Midfield site area would generate another \$78,000. In total, nearly a \$200,000 impact to the Authority's existing ratepayers.

It is not the Authority's intent to stand in the way of this project in any way and in fact, as indicated, the Authority strongly supports the installation of public water and hopes to partner with the Township and DEP in order to do so. However, by copy of this letter to Representatives Murt and Stephens and Senator Greenleaf, together with Horsham Township Manager, William Walker, the Authority does wish to initiate a dialogue with its local lawmakers to address the lack of funding for tapping fees of a non-profit Municipal Authority as part of a HSCA project.

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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
Alex Dyke, P.E.
William T. Walker, Horsham Township Manager
Honorable Stewart Greenleaf, State Senator
Honorable Todd Stephens, State Representative
Honorable Thomas Murt, State Representative
Timothy Cherry, Supervisor, Hazardous Sites Cleanup Program
Ragesh R. Patel, Environmental Group Manager

Response to Comment # 11:

The Department appreciates the comment and thanks HWSA for their support and cooperation on both the Limekiln PCE waterline project, and the Midfield VOCs Site. The Department has selected the waterline alternative as the response action for Midfield VOCs. Investigation into a possible source of the contamination will be pursued. Typically, when HSCA performs waterline response actions, the associated water supplier contributes funds to the projects, rather than charging tapping fees. Regarding tapping fees specifically, the Department's policy only allows such fees to be funded by HSCA when the water supplier itself funds and performs the creation, extension, or interconnection of a public water

system (*Guidance for Commonwealth-Funded Water Supply Response Actions*, Doc. No. 262-5800-001, June 15, 2013). As the extension of the existing water system infrastructure in Horsham Township is being funded by HSCA, tapping fees would not be provided by the Department.

Comment #12: Letter from Representative Todd Stephens, 151st Legislative District:

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|--|--|---|
| <p>TODD STEPHENS, MEMBER 151ST LEGISLATIVE DISTRICT</p> |  | <p>COMMITTEES CHILDREN AND YOUTH CONSUMER AFFAIRS GAMING OVERSIGHT JUDICIARY</p> |
| <p>PO BOX 202151 HARRISBURG, PA 17120-2151 PHONE: (717) 260-6163 FAX: (717) 782-2898</p> | <p>House of Representatives Commonwealth of Pennsylvania</p> | <p>COMMISSIONS PENNSYLVANIA COMMISSION ON SENTENCING</p> |
| <p>515 STUMP ROAD NORTH WALES, PA 19454 PHONE: (215) 368-5165 FAX: (215) 368-5169</p> | <p>E-mail: tstephen@pahousegop.com www.RepToddStephens.com</p> | |

May 19, 2014

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

Re: Midfield Drive VOC HSCA Site
Horsham Township
Montgomery County, PA

Dear Carly,

Please accept the following comments for the Pennsylvania Department of Environmental Protection's (DEP) administrative record for the Midfield Drive VOC HSCA Site.

As evidenced at the meeting on April 7th of this year, a majority of the residents affected by the water contamination support installing a public water line to their homes. I support their request for DEP to connect their homes to a public water line in a timely manner.

I appreciate DEP's efforts to accommodate my constituents who have been affected by the contamination. Please consider the residents' strong support for public water as you determine the best way to remedy this situation in the most expedient manner possible.

Thank you for the opportunity to offer comments on behalf of my constituency on Midfield Drive. If you have any questions please do not hesitate to contact my office at 215-368-5165. Thank you for your consideration of my request.

Sincerely,



Todd Stephens, Member
Pennsylvania House of Representatives

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Response to comment #12:

The Department appreciates the comment, and thanks Representative Stephens for his support. In order to abate the health risks posed by contaminated groundwater in the area, the Department has selected the waterline alternative as a response action for the Site. Homes currently affected by VOCs in their well water, and homes likely to become contaminated in the future, will be connected to the existing public water supply.