

General

LANL

Julia Mullen

From: Mayer.Richard@epamail.epa.gov
Sent: Tuesday, October 29, 2002 8:27 AM
To: john_young@nmenv.state.nm.us; apsonick@tceq.state.tx.us; jarends@nuclearactive.org; slug@lanl.gov; tsewell@tceq.state.tx.us; mdale@lanl.gov; jjames@ensafe.com
Subject: [CPEO-MEF] letter to Whitman

----- Forwarded by Richard Mayer/R6/USEPA/US on 10/29/02 09:21 AM -----

Debra Tellez

To: Bob Sturdivant/R6/USEPA/US@EPA,

Cheryl

Overstreet/R6/USEPA/US@EPA, Jamesa

10/29/02 08:57 AM

Harris/R6/USEPA/US@EPA,

Allen Chang/R6/USEPA/US@EPA, Michael
Overbay/R6/USEPA/US@EPA, Chris

Villarreal/R6/USEPA/US@EPA,

Hillol Ray/R6/USEPA/US@EPA, Tom

Poeton/R6/USEPA/US@EPA,

Kim Ngo/R6/USEPA/US@EPA, David

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Stubblefield/R6/USEPA/US@EPA, Richard
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Martinez/R6/USEPA/US@EPA, Susan

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Camille Hueni/R6/USEPA/US@EPA, Charles
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Catherine Roberts/OCP/R8/USEPA/US@EPA,

Scott

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Lisa Price/R6/USEPA/US@EPA, Blake

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Andrew Waite/R6/USEPA/US@EPA, Timothy
Herfel/R6/USEPA/US@EPA, Sylvia

Ritzky/R6/USEPA/US@EPA,

Stephen Gilrein/R6/USEPA/US@EPA

cc:

Subject: [CPEO-MEF] letter to Whitman

FYI



----- Forwarded by Debra Tellez/R6/USEPA/US on 10/29/02 08:56 AM

13716

Michael Overbay

To: Debra Tellez/R6/USEPA/US@EPA,

Laurie

10/29/02 08:01 AM

King/R6/USEPA/US@EPA, Bob

Sturdivant/R6/USEPA/US@EPA

CC:
Subject: [CPEO-MEF] letter to Whitman

Aberdeen citizens group wrote Whitman to get EPA to take an enforcement action against DoD. They have up to 1 ppb in finished water, thanks to dilution.

----- Forwarded by Michael Overbay/R6/USEPA/US on 10/29/02 08:00 AM

Bill
Diana
Bailey/SUPR/R7/US
EPA/US@EPA
10/28/02 04:28 PM

To: Alyse Stoy/CNSL/R7/USEPA/US@EPA,

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Micinski/CNSL/R7/USEPA/US@EPA, Daniel
Wall/SUPR/R7/USEPA/US@EPA, Dave
Williams/SUPR/R7/USEPA/US@EPA, David
Cozad/CNSL/R7/USEPA/US@EPA, Debbie
Kring/SUPR/R7/USEPA/US@EPA, Denise
Roberts/CNSL/R7/USEPA/US@EPA, Diana
Bailey/SUPR/R7/USEPA/US@EPA, Don
Hamera/SUPR/R7/USEPA/US@EPA, Don
Lininger/SUPR/R7/USEPA/US@EPA, Gerhardt
Braeckel/CNSL/R7/USEPA/US@EPA, Jonathan
Kahn/CNSL/R7/USEPA/US@EPA, Karla
Asberry/SUPR/R7/USEPA/US@EPA, Kenneth
Buchholz/SUPR/R7/USEPA/US@EPA, Kenneth
Rapplean/SUPR/R7/USEPA/US@EPA, Norma
Tharp/CNSL/R7/USEPA/US@EPA, Paul
Roerman/SUPR/R7/USEPA/US@EPA, Robert
Koke/SUPR/R7/USEPA/US@EPA, Robert
Mournighan/SUPR/R7/USEPA/US@EPA, Ronald
King/SUPR/R7/USEPA/US@EPA, Scott
Marquess/SUPR/R7/USEPA/US@EPA, Timothy
Curry/SUPR/R7/USEPA/US@EPA, Victor
Lyke/SUPR/R7/USEPA/US@EPA, Bob

Bob Wing/R2/USEPA/US@EPA, Charles

Douglas Bell/OIG/USEPA/US@EPA, Gary
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Jay Silvernale/EPR/R8/USEPA/US@EPA, John
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Mario Villamarzo/R4/USEPA/US@EPA, Mark
Ader/R10/USEPA/US@EPA, Martha

Michael Overbay/R6/USEPA/US@EPA, Nancy
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Kurt Boeckmann
nrstrer@mail.dnr.state.mo.us,
nrzamar@mail.dnr.state.mo.us,
Wade.Gregson@NDEQ.State.NE.US
cc:
Subject: [CPEO-MEF] letter to Whitman

----- Forwarded by Diana Bailey/SUPR/R7/USEPA/US on 10/28/02 04:24 PM

CPEO Moderator

<cpeo@cpeo.org>
cpeo-military@igc.topica.com

To:

cc:

letter to Whitman

10/28/02 02:50 PM

Subject: [CPEO-MEF]

Please respond to

cpeo

The following letter was sent to the US EPA Administrator, Christine Todd Whitman, from the President of the Aberdeen Proving Ground Superfund Citizens (APGSCC), Glenda Bowling.

October 24, 2002

Christine Todd Whitman
Administrator, US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Ms. Whitman:

The chemical perchlorate has been detected in seven of the eleven City of Aberdeen Production (CAP) wells that straddle the boundary of Aberdeen Proving Ground in Maryland. Since July 2002 the detected concentrations in the wells have ranged from 0.55 to 5 ppb. Although the concentrations of perchlorate in the finished water do not currently exceed the State of Maryland health advisory limit of 1 ppb (1), there is now clear evidence that there is perchlorate in the finished water at

concentrations ranging from 0.61 to 1 ppb. We at Aberdeen Proving Ground Superfund Citizens Coalition (APGSCC) believe that there is clear consensus that sufficient scientific data exists to justify immediate action to protect human health. We are now concerned that the delay in action will result in unnecessary human exposures.

The perchlorate is thought to derive from historic and current training activities in the vicinity of Camp Stanton, Aberdeen Proving Ground, although no single incident or source location can be pinpointed. Given the complexity of the aquifer in the Aberdeen Area and the extent of the contamination it is difficult to predict if and when well concentrations will increase. Thus, we are faced with a completed exposure pathway and are relying solely on dilution to protect the health of local citizens. APGSCC believes this is unacceptable.

Despite consensus at the local level that the perchlorate issue must be addressed, it is the current policy of the Department of Defense to oppose action to remediate perchlorate contamination in the absence of enforceable standards (2). It is our understanding that both EPA Region III and the state of Maryland are reviewing options to insure that APG addresses this contamination.

We have specifically recommended the implementation of an emergency interim remedial action. This action must include the installation of temporary, portable treatment systems on each CAP well containing perchlorate contamination. This should be followed by the installation of a permanent treatment system to treat all CAP wells. We have petitioned both EPA and the state to use the regulatory powers established by CERCLA and SDWA to require APG to undertake an immediate interim remedial action. Such action would serve to ensure the protection of public health.

We have been told that EPA and MDE have been reviewing enforcement options for over three weeks. While we appreciate that it is essential to produce the necessary legal justification for action in the administrative record, we are concerned that the delay in action is sending the wrong message to the DOD.

The residents of the City of Aberdeen need your leadership in addressing this issue. APGSCC has been involved in the oversight of the Superfund cleanup process at APG for more than a decade. Given the history of APG and the lessons we learned from the unnecessary public exposures to trichloroethylene in the adjacent Perryman well field, we need to be more proactive in our response to this latest threat.

Thank you for your time and attention on this important matter. We look forward to discussing this issue further at your earliest convenience. I may be contacted at (410) 272-5925. APGSCC's technical advisor, Dr. Cal Baier-Anderson, from the University of Maryland, Baltimore, can be reached at her home office, (410) 535-9598.

Sincerely,

Glenda Bowling
President, APGSCC
198 Sunnyside Drive
Aberdeen, Maryland 21001

(1) Letter from Robert M. Summers, Director, Water Management Administration, Maryland Department of the Environment to Peter A. Dacey, City Manager, City of Aberdeen, Maryland, dated August 20, 2002.

(2) Memorandum for Deputy Assistant Secretary of the Army (Environment, Safety, and Occupational Health) Deputy Assistant Secretary of the Navy (Environment) Deputy Assistant Secretary of the Air Force (Environment, Safety, and Occupational Health) Staff Director, Environment and Safety,

Defense Logistics Agency Support Services (DSS-E). Subject: Interim Guidance on Sampling for Ammonium Perchlorate Contamination, Signed by John Paul Woodley, Jr., Assistant Deputy Under Secretary of Defense (Environment).

CC:

Donald S. Welch, EPA Region III, Regional Administrator
Steven Hirsh, EPA Region III, Remedial Project Manager
Frank Vavra, EPA Region III, Remedial Project Manager
Richard F. Pecora, Secretary, Maryland Department of the Environment
Richard Collins, Director, Hazardous Waste Division, Maryland Department of the Environment

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<http://www.cpeo.org/lists/index.html>

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