



STATE OF MICHIGAN
DEPARTMENT OF COMMUNITY HEALTH
LANSING

~~JENNIFER M. GRANHOFF~~
GOVERNOR

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DIRECTOR

January 27, 2011

Jack Kelly, Supervisor
Charter Township of Elmwood
10090 E. Lincoln Road
Traverse City, MI 49684

Dear Mr. Kelly:

This letter is in response to public comment you submitted to the U.S. Environmental Protection Agency (EPA) regarding the Grand Traverse Overall Supply (GTOS) site (per your letter to Linda Martin dated December 16, 2010). Some of your comments pertained to public health matters.

The federal Agency for Toxic Substances and Disease Registry (ATSDR) carries out public health activities at Superfund sites. Under a cooperative agreement, the Michigan Department of Community Health (MDCH) conducts those activities on ATSDR's behalf in Michigan. Note that state health department staff who worked on the GTOS site when the contamination was first discovered no longer work at MDCH. However, I retrieved archived records, and also reviewed our current files, in order to answer your questions. Listed below are your requests pertaining to public health, paraphrased and in italics, and our responses.

Identify past well testing locations and the timeframes when these well samples were taken.

Due to privacy laws, I cannot divulge the addresses or owners of private residential wells that were tested. All I can reveal is that the wells were located on West Bay Shore Road, Cherry Bend Road, Cedar Lane, Spruce, and Pico Drive. Other wells that were tested were located at: Grand Traverse Overall Supply, Norris Elementary, West Bay Covenant Church, Harbor West Condominiums, Harbor West Marina, Elmwood Township Hall (at 10740 Cherry Bend Road), the township fire station (on Cherry Bend Road), the city coal dock (no address given), the township artesian well (no address given), and NBT Bank (on West Bay Shore Drive). This list may not be complete, but it reflects when the drinking water sampling first occurred, which was in May and June 1978 (MDCH files). You may want to inquire with the local health department regarding more extensive well-testing records.

Have there been any epidemiological studies conducted on the school children who attended, or teachers who taught at Norris Elementary School during both the period of time that contamination was occurring but undetected, and also after the time when either the State of Michigan or the EPA became aware of the GTOS contamination? Were any such studies ever undertaken by the ATSDR or MDCH's Bureau of Epidemiology? If yes, when were such studies undertaken and by which agency? If not, was there an epidemiological threshold evaluation that

resulted in an official determination that such epidemiological studies were unnecessary? If so, who made that determination and when?

To our knowledge, no epidemiological studies have been conducted here. Please see the January 21, 2011 letter (MDCH 2011) to Fred Keeslar, Medical Officer/Director of the Grand Traverse County Health Department, regarding the rationale for ATSDR and MDCH not conducting such studies (you were copied electronically on that letter).

In a file memo dated July 23, 1992, an MDCH staff member had checked with the local (Grand Traverse County) health department about any community health concerns: "Once exposure was cut off, by well replacement, expressed concerns stopped." Also, the county had "no records of increased illness in the site area" (MDCH files).

Does EPA, ATSDR, or MDCH have any information regarding the names and current whereabouts of the children who attended Norris Elementary School, and the teachers who taught there, during the period of time that the GTOS site was found to be contaminated? Was this information ever requested from the Traverse City Area Public School system? If not, why not?

Because follow-up medical surveillance was not conducted, MDCH did not request information on former students and staff at Norris Elementary.

MDCH takes the issue of informing people about potential exposure to environmental contaminants very seriously. The Michigan Department of Public Health (the name of the state health agency at the time) Water Supply Division "issued a health advisory to the Traverse City School District on May 16, 1978, by telephone and confirmed with a letter dated May 18, 1978. The recommendation was to cease use of the water for drinking and cooking." The owners of all the wells sampled were issued letters with the results of the sampling, interpretation of the results, and recommendations regarding well use or abandonment. State agency staff had an open meeting with the Elmwood Township Board on August 10, 1978 to provide information on the contamination issue (MDCH files).

Was there a certain period during which potential exposure to the contaminated soils and vapors was determined to be of more immediate concern, after which time the potential harmful effects to the general public were determined to be negligible? If so, when did that occur and was that determination ever made public?

Drinking water was considered the critical exposure pathway when the contamination was discovered in 1978. The school immediately stopped using its well for drinking water. Residents with affected wells were informed of the contamination and advised against continued use of the wells (MDCH files).

As environmental investigations continued and the vapor-intrusion pathway (gases in soil entering building space) was evaluated, MDCH reviewed the soil-vapor and indoor-air sampling data from Norris Elementary School. In a health consultation report dated November 8, 2005,

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MDCH concluded that very low levels of PCE (perchloroethene or perchloroethylene) and TCE (trichloroethene or trichloroethylene) detected in the indoor air at the school were not expected to cause harm to public health (ATSDR 2008). The school reportedly closed in 2008 (L. Martin, EPA, personal communication, 2010).

MDCH has looked at more recent soil-vapor sampling data and has requested that EPA continue to obtain data so that public health implications can be determined. Specifically, benzene detections in sub-slab samples at Norris Elementary need further investigation and sub-slab sampling at (inside) Harbor West Condominiums should occur (MDCH 2011).

If you have any further questions, please do not hesitate to contact me.

Sincerely,



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References:

Agency for Toxic Substances and Disease Registry (ATSDR). Health consultation concerning Norris Elementary School Indoor Air Assessment, Grand Traverse Overall Supply Company, Greilickville, Leelanau County, Michigan. Atlanta: US Department of Health and Human Services; 2005a November 8.

http://www.michigan.gov/documents/Norris_Elementary_School_Health_Consultation_142189_7.pdf

Michigan Department of Community Health (MDCH). Letter to Fred Keeslar, Grand Traverse County Health Department, from Christina Bush concerning Grand Traverse Overall Supply Superfund site in Greilickville, Michigan. Lansing, Michigan. January 21, 2011.