

20170201 (Special Meeting) BoRit CAG Board Meeting Minutes

Date: Monday, January 18, 2016

Time: 6:30 PM

Location: Ambler Borough Council Chambers, Ambler, PA 19002

I. **Call to Order:** Meeting opened at 6:30PM by Bob Adams and Sharon Vargas.

II. **Welcome and Announcements**

Special thanks to Carol DiPietro for assisting in note taking along with Sharon and Bob.

III. **Purpose of Special Meeting**

A Special Meeting of the BoRit CAG was held on Wednesday, January 18, 2017, at 6:30 p.m. at the Ambler Borough Council Chambers located at 131 Rosemary Avenue, Ambler, Pennsylvania. The purpose of the meeting was to review the BoRit Asbestos Superfund Site Proposed Remedial Action Plan Review, dated December 2016, prepared by the Technical Assistance Services for Communities (TASC). All attendees received a copy of the report, which is also available on line at <http://www.boritcag.org>. A copy is also attached. A copy of a letter written by Stephen Maroldo was also distributed during the meeting.

IV. **Discussion**

Discussion started on Page 11 of the TASC BoRit Asbestos Super Fund Site Proposed Remedial Action Plan Review. Nineteen (19) Section D - TASC Technical Comments were discussed.

Comments were made that the private citizen should not be expected to or burdened with monitoring the site. We want the EPA to remain engaged in the monitoring. However, a suggestion was made to erect signs with instruction on where to call or e-mail concerns about breaches to the cap, vandalism or other detrimental activities.

General Comments GC

- **GC #1:** It was stated FEMA flood maps have been recently updated. Several requested to change the 100-year flood that EPA used as a design flood to the 500-year flood. All agreed heavy armoring is needed to withstand flooding. It is noted several years ago during a rain event, some of the armoring was washed away. The armoring should be monitored closely after the next major flood and after future floods.
- **GC #2:** Concerns were raised about the compacted soils of the cap creating or forming a significant barrier for rain water runoff which can cause additional flooding.
- **GC #3:** A comment was made that, in enforcing the TMDL for the Wissahickon Creek, the EPA is applying pressure to the municipalities to clean up the water quality in the creeks as they could be allowing contaminants to escape from this site.

It was decided that the CAG should ask EPA to consider the possibility that improved water treatment technology might be developed in the future, and that if such a

development occurs, that this technology might be applied retroactively to decontaminate the water in the reservoir. The CAG would like to see that written into the final plan and/or the institutional controls.

- **GC #4:** A request was made to have the existing capped areas, and particularly the waste cells, identified by a figure in the final plan.

Specific Comments (SC)

- **SC #5: Operations and Maintenance (O&M), Page 1:** All agreed operation and maintenance is an important area of concern. The CAG request that the EPA stay engaged in the monitoring of the site, rather than PADEP. It was mentioned that this is important to raise the community's comfort level. Requesting air monitoring, especially during mowing was suggested. All would like to know what is the plan after 30 years? Clarification is needed on the reviews. Clarification on how air quality samplings will be conducted in 5 years.
- **SC #6: Removal Action, Page 4:** Concern was raised about the steepness of the slopes. Question raised: Could they cause rainwater runoff, which in turn could erode the dirt cap?
- **SC #7: Human Health, Page 8:** PCME is now antiquated. A request was made to ask for ISO testing to insure protection for health and safety. VOC's and heavy metals pose a significant health risk. Sharon McCormick has the Executive Summary in the RI and will send it to Bob.
- **SC #8: Summary of Park Parcel Contamination – Waste, Soil, and Air, Page 11:** The EPA, through enforcing the Wissahickon TMDL, is working to clean up the Wissahickon Creek and asking municipalities to make significant investments to help meet the TMDL standards. It was stated that it appears they are ignoring the water quality that could be jeopardized by run-off from this site. A request was made to clean up the inorganic pollutants on the site, as they may migrate to the Wissahickon via groundwater movement to the Tannery Run.
- **SC #9: Conceptual Site Model, Page 16:** The attendees agreed they are uncomfortable with the simulation of child recreation, believing that a child playing would stir up more dust and dirt than what was revealed from the EPA simulation. It was stated children play hard; they roll in the dirt, throw it at each other, etc. *Question to raise to EPA:* Does ABS really simulate this accurately, and if it did, would additional heavier activity change the risk levels?
- **SC #10: VOCs, SVOCs and Metals in the Shallow Bedrock Aquifer, Page 23:** Comments were made that the members believe there are potential future risks. Treatment of inorganics was addressed in #7. Questions were raised reference future screenings.
- **SC #11: Remedial Action Objectives, Page 27:** A request was made for the EPA to patrol and remove all the pieces of ACM from the creek downstream of the site and from the over-wash area in the Four Mills Reserve. To date, EPA has patrolled the Wissahickon from the BoRit Site down to the WVWA offices at Four Mills. Although the CAG is pleased with the creek cleanup as far as it goes, the attendees request a patrol of the entire

Wissahickon, since there are numerous pieces of ACM further downstream from Four Mills.

- **SC#12: Cost Components, Page 30:** The EPA factored in the potential future repair costs, using a discount of 7% for developing cost estimates. However, this was reduced to 1.5% in the 2016 update. It was requested the EPA use this discount. *Question to the EPA: Has the EPA revealed any PRP?*
- **SC #13: Common Elements, Page 30:** The addition of groundwater sampling to the other types of sampling named is requested.
- **SC #14: Alternative WSS2: Capping, Pages 30 and 31:** Clarification is requested on how the surface water runoff will be managed.
- **SC #15: Alternative WSS2: Capping, Page 30 and 31:** Clarification is requested on how the institutional controls will be managed. How does the EPA propose to secure the site so that it can be closed after major flooding events, as stated in the PRAP, when it will likely be developed as a park; at least on the Whitpain parcel.
- **SC #16: Alternative WSS2: Capping, Page 34:** Institutional controls are requested for the pile parcel. In particular, the CAG requests that EPA add maintenance of suitable vegetation on the Pile parcel to the institutional controls (ICs).
- **SC #17: Alternative WSS2: Capping, Page 34:** The CAG requests institutional controls to ban use of groundwater for potable use at the site.
- **SC #18: Figure 1, Site Map:** *Questions to raise to EPA:* What, if any, of the ARAR's will be waived? Are ARARs for floodplains applicable? Will Floodplain Management Executive Order 11988 be considered as an applicable ARAR?

• **SC #19: Table 7, Alternative Specific ARARs for Retained Alternatives**
Additional Attendee Discussion/Comments/Questions/Request to Raise to the EPA

- Has the EPA found any potentially responsible parties (PRPs)? If so, please share that information with the CAG.
- What is the solution for animals on the Park? It was stated although there may not be large animals on the site, small animals borough. What types of animals may migrate to the park due to the selected vegetation is not known.
- What measures are in place for private citizens to alert authorities of ground disturbances on the site. All agreed it should be the responsibility of the EPA and private citizens should not be burdened with the responsibility of monitoring the site on a daily basis. A suggestion was made to erect signs with instruction on where to call or e-mail concerns about breaches to the cap, vandalism or other detrimental activities. All requested the EPA to remain engaged in monitoring the site indefinitely.
- A representative from Whitpain Township mentioned the township has a Maintenance Crew overseeing all township parks. They further mentioned they have not been contacted by the EPA or any other agency to discuss their level of responsibility in site day-day

management and maintenance. They assumed there would be some future discussion. Attendees questioned Maintenance Crew safety on the site and again, discussed air quality monitoring.

- What is the status of Whitpain Township building a Boys and Girls Club on the Park?
- It was suggested by Rich Pepino, University of Pennsylvania, the CAG should consider identifying a list of key issues that the CAG would like to include in the response to the EPA. Under these headings all concerns could be addressed.
- Dr. Blair and Rich Pepino, University of Pennsylvania, offered to draft a statement to address the below key issues discussed and submit it to the Co-Chairs for distribution/discussion at the next CAG Meeting scheduled for February 1, 2017. They suggested their communication could be a starting point for further discussion.

The Attendees suggested the following seven (7) key areas, which may not be inclusive:

1. Flood Plain Effects
2. Protection of Human Health and Safety
3. Risk Assessment
4. Keeping the EPA engaged as the prime monitor.
5. Confirmation Future use will be protective of human health
6. Institutional Controls
7. PRP's

V. Next Steps

- Once received, distribute draft communication from Dr. Blair and Rich Pepino to CAG Members.
- Possible Special Meeting (TBD) prior to next scheduled meeting on February 1, 2017. CAG Members will be notified via email if a meeting is scheduled. All CAG Members are requested to attend in the event a special meeting is announced.
- Draft Comments to the EPA.

VI. Meeting Adjourned:

There being no further business, the meeting adjourned at 8:30PM. Next regular CAG meeting is scheduled for Wednesday, February 1, 2017 at 6:30PM. The meeting will be held at Upper Dublin Township Building.