

To: BoRit Asbestos Area Community Advisory Group  
From: Melinda Holland, CAG Facilitator  
Date: January 20, 2008  
Subject: **Summary of the December 19, 2007, BoRit Asbestos Area Community Advisory Group Caucus Meeting**

### **Next Meeting**

The next BoRit Asbestos Area Community Advisory Group meeting will be held as follows:

Date: **Wednesday, February 6, 2008**  
Time: 6:30 - 9:30 p.m.  
Location: **Upper Dublin Township Meeting Room**  
**801 Loch Alsh Avenue**  
**Fort Washington, PA 19034**

If you have questions or comments regarding the upcoming meeting or about this summary, please contact Melinda Holland at [melindaholland@alltel.net](mailto:melindaholland@alltel.net) or 828-894-5963.

### **CAG Attendees**

Attending were: Anne Misak, Clean Water Action; Fred Conner, Whitpain Residents Assoc & Whitpain Planning Comm.; Lynn Hoffmann, Mercer Hill Village Assoc.; Michelle Naps, M.D.; Sharon McCormick, Citizens for a Better Ambler; Bud Wahl, Mayor of Ambler; Susan Curry, Ambler Environmental Advisory Committee; Roman Pronczak, Whitpain Twp. Deputy Twp. Manager; Sal Boccuti, S. Boccuti Photography; Diane Morgan; Eileen Fournier; Joanne Walker, Esq., Whitmarsh Township Residents Assoc.; Beth Pilling, Montgomery Co. Planning Commission; Flo Wise, West Ambler Civic Association; and Bob Adams, Wissahickon Valley Watershed Association.

CAG Members not attending (nor represented by an alternate) were: Eddie Curtis; Dave Caddick, Caddick Construction Inc.; Lynda Rebarchak, PADEP; Larry Johnson, EPA Region 3; Paul A. Leonard, Upper Dublin Township; and Ron Curtis Jr., Final Touch Barber Shop.

### **Observers**

Steve Ware, Philip Heimlich, Sanra Heilmlich, Sam Matlin, Jerome Charen, Mary Maxon, Bill Baker, Tim Hughes, Edythe Marincola, Randy Martin, Judy Baigis, William Rose, Rosalind Johnson, James Patton, and Rose Gallo.

### **Meeting Highlights**

- Introductions;

- Review CAG draft comments on the EPA proposed Removal Action;
- Breakout groups develop revisions to CAG comments document;
- CAG discussion and development of consensus on CAG comments document;
- Next steps & action items.

CAG Co-Chair Fred Conner opened the meeting by reviewing the documents distributed at this meeting, the groundrules, the agenda, and led the participant and observer introductions. Mr. Conner also asked if there were any additional comments on the summary of the November 28<sup>th</sup> CAG meeting. Facilitator Melinda Holland explained that her funding support from EPA is running out and that the next CAG meeting will be her last meeting.

Fred Conner explained that the goal of this CAG meeting was to develop consensus of all CAG members present on the CAG's draft comments on the EPA proposed Removal Action. He reminded the CAG that these comments must be submitted to EPA no later than December 31<sup>st</sup> to be considered. He then explained the goal of the cover letter and the comments document, noting that any CAG member may also submit their own separate comments to EPA. Discussion and editing of the cover letter followed, and the CAG reached consensus on the contents of the cover letter.

Next, Mr. Conner asked the primary authors of each section of the CAG's draft comments on the EPA proposed Removal Action to explain their section of the document. After some discussion, Mr. Conner asked the CAG to divide into breakout groups to focus on revisions to/agreement on each individual section of the document. When the full CAG reconvened, the CAG discussed each section individually. Consensus was reached on the language of "Area of Concern #1 - Effective and Environmentally Sensitive Stream-Bank Stabilization". Consensus was reached on the language of "Area of Concern #2 - Complete and Effective Encapsulation of Removal of all Exposed Asbestos Containing Material". After much discussion, it became evident that the CAG would not be able to reach consensus on the remaining three sections during the time left for the meeting. The CAG agreed that during the next week they would review and comment on the work products of the breakout groups (Areas of Concern #3, 4, 5) and Fred Conner agreed to broker consensus agreement on the language before the EPA deadline of December 31<sup>st</sup>.

After the December 19<sup>th</sup> CAG meeting, through the efforts of Fred Conner and the CAG members, consensus was reached among all CAG members on final comments to EPA which were submitted electronically on December 31<sup>st</sup>. A PDF copy of the final document as submitted to EPA will be distributed with this meeting summary.

### **Observer Comments**

An observer from the Blue Bell Country Club neighborhood stated that he and many other community members have family members who have died of mesothelioma. He suggested adding something to the comment document which stresses the seriousness of the risk from the site. He stated that he has reviewed the EPA's

information, and information provided by CAG members, and have done his own analysis and review of the information currently available. He shared that he is a retired mechanical engineer who developed the life support systems for the space shuttle astronauts.

This observer noted that the EPA states that samples taken off site detected no airborne asbestos. This data was taken at a time when the water content in the ground was about 40% which explains why no off site airborne content was found – with the ground so laden with moisture, loose micron level particles were mostly contained and trapped by the strong forces of water surface tension. He asserted that a more appropriate condition under which the samples should have been taken would have been when the ground was essentially dry, i.e. less than 10% water content as was the case during the beginning of this past summer.

He noted that, according to the EPA, three on-site samples showed measurable levels of asbestos. The EPA would only be concerned about these levels if people were exposed to them on a daily basis, 24 hours per day, and for a period of 30 years or longer. The facts are that as little as one asbestos particle ingested into the lungs can and has caused mesothelioma in patients from 10 to 50 years later in life. Of the people exposed to asbestos, approximately 1 out of thousands of those people exposed will die of mesothelioma.

He further explained that, in the EPA's Summary of the air samples where asbestos was detected, the first data point was given as 0.00049 fibers/cc, when the ground water content was about 40%. This data point when converted to terms the average citizen can comprehend is actually 13.87 particles per cubic foot. If a person at light to moderate work activity (~3 cubic foot per minute respiration rate) were to breathe this air, he/she would ingest about 40 particles per minute for every minute he/she was exposed. It is therefore important that new data be taken when the ground is dry in summer like weather throughout the Ambler downtown area as well as at the site. Bo-Rit is located in the heart of the bustling and thriving community of Ambler, PA. Of major concern, in terms of location proximity are the McDonald's, the Septa Train Station, and the housing and businesses in Ambler. Because the asbestos will distribute over a vast area by air currents and wind, he stated that he is even concerned about where I live in Blue Bell, about 4.5 miles from Bo-Rit.

Another observer suggested mentioning "stakeholders" and the broader community more often in the comment document. Another observer noted that the proposed removal actions are necessary and desirable at this time, that the nature and amount of asbestos at the site requires admission on the National Priorities List (NPL), a full remedial investigation/feasibility study (RI/FS), and a comprehensive remedial action and that these points should be included in the CAG's cover letter and comments document.

An observer agreed with the gentleman from Blue Bell Residents Association, that data published by the EPA has been put in terms that have the appearance of being deceptive and certainly not easily understood by the public in general ("fibers per

square foot" verses "fibers per cubic-centimeter"). This type of reference in all EPA communication needs to be put in readily and easily understandable terms by the novice.

The observer noted that while this removal action may be an acceptable first step only for a potential short-term solution it is absolutely by no means an all-inclusive long-term solution. He further expressed concern that any proposed short-term removal action may likely become a long-term "take it or leave it" action. The very rushed nature of this public comment process leaves any perceived "acceptance" by the CAG to be subjective and under duress. He offered specific comments on the Areas of Concern in the CAG comment document as follows:

Area of Concern #2 - The observer stated that "Areas of exposed ACM" that are to be targeted by EPA for "treatment" are far too subjective, as there is no definition as to exactly what will be covered and the depth of coverage that any given area will receive, and how it is to be qualified. In addition, a typical remedy for such an asbestos site would normally include a geo-barrier, which is not mentioned in this EPA proposal. He expressed concern that only a small percentage of the 38-acre site is to be "treated" to a "safe" level, while potential re-use (such as a recreational area) is under consideration. He noted there is a contradiction to fencing the entire perimeter if some of the property is to be accessible for recreational or other use.

Area of Concern#3 - He suggested that "cover the asbestos, make it functional, but do not unnecessarily disturb the substratum" is the best overall policy in all aspects.

Area of Concern #4 - While questioning the inherent weakness and vulnerability of institutional controls in general, the observer suggested consideration of the creation a tri-municipal collaboration between Upper Dublin, Ambler, and Whitpain, whereby any proposed usage of any parcel be subject to the requirements of each of the three adjacent municipalities as if that parcel resided in each of the three of municipalities concurrently, for purposes of but not limited to: zoning, planning, proposals, permits, inspections, etc.

Area of Concern #5 - The observer stated that any fix must remedy this site to potentially be returned to a stable and usable property that can contribute to the welfare of the surrounding communities and residents. This is where the EPA and the CAG must work together in partnership for a win-win overall and permanent solution.

### **CAG Meeting Action Items**

<b>Action</b>	<b>Assigned To</b>	<b>Due Date</b>
Provide Co-Chairs with typed revisions as made in breakout groups on 12/19	Work Group Members	12/20/07

Circulate revised comment document to full CAG	F. Conner	12/20/07
Coordinate revisions and consensus development on CAG comment document	F. Conner	12/31/07
Confirm location for next CAG meeting	M. Holland	12/31/07

**Documents Distributed**

<b>Document Subject</b>	<b>Document Description</b>	<b>Date; Generated by (if known)</b>
Meeting Agenda	Agenda	12/13/07; Holland
Draft Cover Letter and CAG Comments	Comments	CAG Work Group