

BoRit Asbestos Superfund Community Advisory Group Meeting

August 2013 Minutes

Date: August 7th 2013

Location: Upper Dublin Township Building, 801 Loch Alsh Ave, Fort Washington PA 19002

Pre-meeting BoRit Site Tour

Prior to the CAG meeting, members were taken on a tour of the BoRit site, led by Eduardo Rovira, the on scene coordinator. The tour started with a presentation of a remediation plan for the reservoir. The major points of the plan are:

- The reservoir will be emptied via a filtration system and water discharged into the Wissahickon creek in accordance with PA DEP requirements.
- The trees surrounding the reservoir will be removed.
- The emptied reservoir will be investigated for any ingress and egress water channels which may also help determine the nature of the seep at the exterior base of the berm nearest the Wissahickon creek.
- The bottom of the reservoir will be graded to produce a more uniform depth of approximately 6 feet, but with an area set aside for a depth of 8 feet to accommodate fish habitat, should fish be reintroduced by the owners of the site. It is also planned to create some small islands to accommodate nesting birds and appropriate vegetation.
- A staging area will be constructed on the west Maple street side of the reservoir to facilitate works which will reclaim a portion of the reservoir. This may remain as a viewing platform after the works are completed.
- A peninsula construction is being considered on the pile side of the reservoir.
- The berms and bottom of the reservoir will be covered with several feet of earth and sand to ensure any remaining ACM is fully covered to an appropriate depth.
- As a result of the above amendments to the reservoir, the final volume and interior perimeter will be reduced from what its current dimensions.
- Appropriate trees and shrubs will be part of the revegetation process.
- The dewatering of the reservoir is expected to commence in September 2013.

Subsequently, the CAG members reconvened at the Upper Dublin Township building and the meeting called to order by Co-Chair David Froehlich at 6.45pm.

Item 1. Public Health Assessment presentation by PA DOH

The presentation was given by Barbara Allerton, Christine Lloyd and Dr. Farhad Ahmed. The presentation can be viewed at <http://www.boritcag.org/health/reports.html>. A question and answer session followed which included the following topics:

- The majority of Mesothelioma cases were amongst 50-70 year olds. There had been no notable change in the trend or number of cases of Mesothelioma in the 19002 zip code since the closure of the asbestos manufacturing works.
- The high levels of Manganese in the reservoir and Wissahickon creek were noted, but as these do

not form part of the Ambler drinking water supply they are not considered a health hazard by PA DOH. Very high exposures to manganese have shown an association with neurological disorders.

- It was noted that all contamination results in the presentation are based on activities prior to the current EPA clean up operations and that health risk thresholds used by PADOH are far lower than those that tend to result in incidence of disease.
- EPA assured that current operations at the site are managed such that disturbed ACM does not result in fibres reaching the perimeter or beyond the site.

Item 2. Superfund site reuse presentation by Jill Lowe, EPA Remedial Project Manager at BoRit.

As a demonstration of how superfund sites can be remediated to return previously closed areas to new community use, Ms Lowe gave a presentation of such a site in Havertown PA. (See presentation at <http://www.boriticag.org/about/presentations.html>). A question and answer session followed, which raised the following issues:

- Two members commented that asbestos and nuclear waste were the most challenging superfund projects and whilst the Havertown project was instructive on process it was felt that this was not comparable to the challenges with asbestos sites. Sharon McCormick requested EPA to provide details of an asbestos site that had been successfully returned to community use.
- The subject of replanting trees at BoRit was raised by Susan Curry as it is understood that Whitpain Township has plans to do so on the park section of the site. This was confirmed by Whitpain Township and that the depth of soil where trees are to be planted will be raised to an appropriate height to avoid roots reaching down to the covered ACM. This heightened soil depth is expected to be 4-5ft.
- Beth Pilling (future uses workgroup) advised that the CAG had not given EPA any definitive idea as to what the community wanted to see as a final remediated site that could be returned to community use. Though the future uses group had drawn up some plans a few years ago, these were never formally accepted by the CAG and the future uses group had not been active pending a clearer understanding as to what the EPA remediation plan would look like. As we are now much nearer that time, and now that the site development has revealed a new look to the public, it was suggested by Gordon Chase that perhaps now was a good time to reconvene the future uses group and tackle this issue.
- Diane Morgan expressed a view that the asbestos itself is not being addressed, merely covered up. Jill Lowe advised that that EPA had not made any final decisions as to a remedy for the site and that the Record of Decision was still some way off.
- EPA advised that best engineering practices would be used based on a final reuse design, with a two feet six inch base above the ACM being a minimum barrier between any development on the site and the underlying ACM. Sharon McCormick stated that she would like to see any reuse scenarios that EPA might have in mind.

Item 3. Workgroup reports.

RR&M

The RR&M group met twice since the last CAG meeting in June and minutes of the June 19th and July 31st RR&M meetings can be found at <http://www.boriticag.org/about/rrm-minutes.html>. The key action items from these meetings were:

- To request a TASC grant from EPA to fund the hire of an asbestos air monitoring expert such that a

fully formulated request could be put to EPA for ongoing monitoring of asbestos in and around the Ambler Piles and BoRit asbestos superfunds sites, encompassing the town and environs of Ambler.

- To ascertain the existence of possible alternative remediation techniques for asbestos other than the conventional earth cap. Several alternatives were detailed in the RR&M minutes and the basics of each related to the CAG. It was emphasized that the RR&M were making no evaluation of these techniques, nor commenting on their suitability, but merely investigating the range of options available. Having detailed these options the RR&M requested that EPA take these alternatives, together with any others they may be aware of that are not listed in the RR&M findings and give due consideration to them in their RI/FS deliberations.
- The RR&M reviewed the PADOH Public Health Assessment (public comment version) of July 25th and were approving of the report. There were comments the RR&M wanted to formally present to PADOH as part of the public comment, through the CAG, namely¹:

a) The report considers only the contaminant of original concern, i.e. asbestos. It makes no reference to contaminants other than asbestos found at BoRit since the EPA began its work, namely those contaminants found in groundwater and subsurface soils. It was felt that perhaps PADOH should make reference to the fact that other contaminants of concern have been found at BoRit that are not included in the PADOH health report.

b) It was noted that Activity Based Sampling at the reservoir parcel, whilst producing no detections of asbestos fibers, was limited to sampling at one location only. Considering the size of the perimeter of the reservoir parcel RR&M members present expressed concern that a single site test location may be insufficient to represent the reservoir parcel as a whole and requests PADOH and EPA to review this concern.

c) RR&M members noted PADOH and EPA's statements on high levels of asbestos (above MCL) found in surface waters both at the reservoir and the Wissahickon creek, and that the reservoir discharges into the creek via a seep at the base of the reservoir berm. It is understood that the USA Army Corps of Engineers is currently studying the reservoir parcel and the RR&M looks forward to receiving its report as soon as possible, but in the meantime RR&M requests clarification from PADOH/EPA as to the legal position regarding a superfund site discharging material into a public waterway.

d) It was noted that the high levels of asbestos above the MCL found in the surface waters of the reservoir parcel at BoRit and Wissahickon creek were not considered a health risk to the public in Ambler as neither the reservoir nor the Wissahickon are a source of public drinking water in Ambler. However it is understood that the Schuylkill River at Philadelphia, which is fed by the Wissahickon, does provide Philadelphia with a portion of its drinking water and RR&M members wondered whether any testing for asbestos at public water intakes downstream of Ambler is conducted or whether downstream municipal authorities have been informed. RR&M members also noted that asbestos contamination from the reservoir, reaching the Wissahickon may be deposited upon the banks of the stream as the stream level rises and falls. Such deposits then have the possibility of subsequently becoming airborne. Hence the concern regarding discharges from the reservoir.

¹ The response to the PADOH Public Health Assessment was drafted prior to the new plans for the reservoir revealed at the BoRit site tour just prior to the CAG meeting.

e) PADOH comments on the now demolished K&M buildings were duly noted. However it is of some concern to RR&M members that the site, which clearly has a vast amount of building rubble and still intact basement floors and walls exposed to the air, is left uncovered and unprotected. RR&M members are concerned that there may still be much ACM on this site exposed to the elements and requests EPA, PADOH and PADEP investigate the nature of the asbestos risk to the public health from this site.

The RR&M requests that PADOH accepts the foregoing as an official response to the public comment version of the health report.

- RR&M member and CAG Co-Chair David Froehlich, had proposed a question (in absentia) as to why ACM material that has been moved from one part of the site to another, is not moved off site to a regulated Asbestos waste facility, rather than simply repositioned elsewhere at BoRit? The RR&M chair suspects that this is simply a matter of economics, but will pose the question to EPA at the August CAG. This question was so presented to the EPA.

This concluded the RR&M report. No other work groups reported as having met.

Item 4. AOB

- CAG requested EPA to provide the results of the bore sampling that has recently taken place on site together with the US Army Corps of Engineers draft report on the reservoir at their earliest convenience so that CAG members can review before the next CAG in October.
- Sal Boccuti commented that with the level of activity and reporting expected over the next year including the RI/FS which is expected in 2014, that the CAG should consider returning to a monthly meeting. This to be an agenda item in October.

There being no other business, the meeting adjourned at approximately 9.15pm.