

Memo

To: Stacie Peterson, Francisco Cruz, Joe Dougherty - USEPA
From: Eric Lindhult – Remediation / Removal and Monitoring Work Group Leader
CC: Bob Adams / Fred Connor – CAG Co-Chairs; CAG Membership
Date: August 8, 2009
Re: Comments on the BoRit Site investigation Planning Guide date July 21, 2009

At the Remediation / Removal and Monitoring Working Group (Group) meeting on August 3, 2009, the Group discussed the BoRit Site investigation Planning Guide date July 21, 2009, which will be finalized and used as the work plan for the remedial investigation (RI) at the BoRit Asbestos Superfund Site (Site). Below are questions/comments that the Group formally submits to the EPA for consideration prior to finalizing the work plan.

Page 1 – The document states that the Site is in Ambler. The CAG requests that the location of the BoRit Site be clarified as the Park being located in Whitpain Township, the reservoir being primarily located in Upper Dublin Township and the Asbestos Pile being located in Ambler.

Page 2 – Fourth bullet – “. . . in regard to BIRD AND FISH species observed . . .”

Fifth Bullet – “. . . Valley Watershed AND THE US GEOLOGICAL STATION DOWNSTREAM OF FORT WASHINGTON (STATION 01473900) in regard . . .”

Please add the areas that should be identified by means of GPS coordinates or other equivalent method provided by the EPA Borit NPL Team (Leader Mr. Rovira) when you conduct your RI/FS sampling.

See report “Borit Asbestos Waste On Public Land 2009-06-15 “ previously submitted for additional guidance.

Page 3; Question 1 – Due to the potential differences in site and weather conditions, and asbestos concentrations, we do not believe that discontinuing the passive air samples after 2 days is justifiable. Please include the quarterly community air sampling, as stated in the USEPA’s response to Question 11 of the R/R&M Group’s July 6, 2009 submittal.

Record the depth to water elevations in boring locations and survey in sampling locations to obtain additional groundwater elevations to develop more complete contour maps that can be obtained from three temporary piezometers over a 21 acre Park bordered by two streams (Wissahickon Creek and Rose Valley Creek).

Question 1/ throughout the draft work plan - Why has EPA determined to use PLM and PCM instead of the more thorough TEM analysis of the samples?

Page 4; Question 3 – The statement reads that sampling will continue until the native soil is penetrated 4 feet or until the water table is encountered. If the asbestos waste is below the water table in some areas, how will the depth of the waste be determined and is this contrary to the investigation stated in Question 1? If the native soil starts at the groundwater table interface, will the boring stop?

Please clarify that the grab sample from 0” to 3” bgs will be in the cover material and not include any clean material added during the removal process.

Page 5; Question 4/ Page 21; Question 34 – The Group believes that well clusters should be installed to monitor the groundwater quality in the native soil and in the asbestos waste, especially in areas where the asbestos fill extends near or into the water table.

Page 5; Question 5 – The geological and hydrogeological setting of the Site will also be required to refine the CSM.

Page 6; Question 7 – The Fourth Data Gap listed is “EPA Remedial wants to minimize disturbance and minimize additional clearing and grubbing.” How is this objective a data gap?

Page 7; Question 7 - Why does the EPA want to perform the electrical resistivity tests on the Kane/Core parcel and not the Park as well? These tests were performed for the Kane/Core parcel by Gilmore and Associates in 2001 and detected a significant ground water influence under the pile. Could such testing on the Park be warranted to determine or rule out potential ground water influences under the Park as well and to aid in determining the depth of waste at the Park?

Page 8; Question 9 / Page 12; Question 14 – Should the proposed action call for continuous PID headspace readings in case a 4-foot-long Geoprobe sampler is used?

Page 14; Question 18 – If all surface water samples are collected from the bottom of the water column, how will this correlate to the evaluation of the water quality impact on the waterfowl? The Group recommends that several samples be collected from different depths in the deeper portion of the reservoir to create an asbestos concentration gradient in the surface water.

Page 22 – The Group recommends that the decontamination of the rigs be included as a Health and Safety Consideration.

General Comments:

At the recent public meeting, EPA indicated that a team of engineers helped identify where the waste may be located. Please include the following in your evaluation:

All areas down stream of the BORIT NPL Site where there are tide pools, eddy currents behind bridge abutments, obvious overflow ponding and deep water depressions where asbestos waste may have migrated over the past 20 years.

This is a very reasonable expectation since asbestos has been identified in numerous reports to have migrated off site, into the stream. Also, please clarify the EPA’s position on whether asbestos fibers float or sink, since the literature indicates that asbestos cement board is heavier than water, but shredded asbestos is significantly less dense than water and should float.

Has the USEPA reviewed the depositions and court case documents from U.S. vs. Nicolet Industries, which might provide significant information on disposal practices at the former facility?

Under what circumstances will the EPA sample off of the Site during Phase I (e.g, the south side of the Wissahickon Creek flood plain)?