

COMMUNITY ADVISORY GROUP
BoRit Asbestos Area
Ambler / Upper Dublin / Whitpain, Pennsylvania

To: BoRit Asbestos Area Community Advisory Group
From: Schuyler Moon
Date: August 29, 2008
Subject: **Summary of the Wednesday, August 6, 2008, BoRit CAG Meeting**

Next Meeting.

The next BoRit Asbestos Area CAG meeting will be held as follows:

Date: Wednesday, September 3, 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 CAG Co-Chairs Bob Adams and Fred Conner.

CAG Attendees.

All Members were present except for Dr. Naps who was traveling on business.

Observers.

More than 75 observers were present for at least part of the meeting.

Meeting Highlights.

- Welcome, introductions, and administrative announcements
- Work Group Reports
 - Presentation on the Removal Action Plan by EPA's On-Scene Coordinator
 - Discussion on the Removal Action Plan
 - Comments on the ATSDR & PADOH Health Consultation Report by Lora Werner.
 - Discussion/Question and Answer period on Health Consultation Report.
- Discussion on CAG recommendations and future actions.

Welcome & Administrative Announcements.

CAG Co-Chair Fred Conner opened the meeting by introducing the TASC consultants that were present. Douglass Streaker from Biohabitats and Michele Benchouk from Booz Allen were present to observe the presentations and provide expert advice to the CAG.

Mr. Conner asked if there were any questions or comments on the June meeting summary. There were none.

A packet of documents was distributed to Members which contained: the proposed agenda, guidelines for meeting conduct, an email from HERS Group Chair Michelle Naps summarizing the groups progress to this point, a letter written by the CAG Co-Chairs to EPA Region #3 on July 10, 2008 (expressing concerns with the USEPA's participation in the CAG process), and outlines of the TASC consultants professional. A CAG Member requested to make handouts double sided.

CAG Co-Chairs Bob Adams and Fred Conner reviewed the proposed agenda and the guidelines for meeting conduct. There were no questions or comments on the proposed agenda. The meeting then turned to reports from the Work Group leaders.

Work Group Reports.

1. Health, Environment, Safety and Risk (HERS) Group- Chair Michele Naps
Summary of progress was made available in the packet of handouts distributed by the Co-Chairs at start of meeting. Highlights from the report included:

- The HERS group has been holding monthly teleconferences on the second Monday of every month between 5 and 6 o'clock in the evening. Any CAG Member or citizen expressing serious interest is welcome to join the group, or participate in the conferences. Two meetings have taken place so far.
- The group is attempting to meet with Dr. Steven Ostroff from the PADOH. Dr. Ostroff is overseeing the epidemiology report that the CAG is anticipating to come out in the near future.
- Dan Strasbaugh of ATSDR region 8 attended the last meeting and was involved in health data analysis for Libby, Montana. HERS group has been reviewing the Libby, Montana data in order to look for similarities and public health insights that can be applied to the BoRit area.
- ATSDR Representative Lora Werner is in the process of scheduling a meeting with another representative from ATSDR region 8 to further discuss ATSDR's experience in Libby, Montana.
- CAG and HERS group Member, Dr. Emmett toured the BoRit site area and surrounding neighborhoods in July.
- A public comment period for the ATSDR Air Sampling Report issued July 14, 2008 is currently underway. The HERS group plans to prepare a written response document.

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- The next regularly scheduled teleconference is scheduled for Monday August 11th at 5:00 pm to 6:00 pm.
2. **Rules Committee-** Chair Joanne Walker
 - The Rules Committee has met briefly on the operating procedures of the CAG.
 - Mrs. Walker would like any suggestions on operating procedures to be emailed to her. The Rules Committee will provide some suggestions at the September meeting.
 3. **Community Awareness (CA) Group-** Chair Diane Morgan
 - Mrs. Morgan reported that PA Representatives Rick Taylor and Mike Gerber have again been contacted about the site.
 - PA Senators Greenleaf and Rafferty have also been sent letters. A letter is on the way from U.S. Rep. Allison Schwartz.
 - Upper Dublin Township and Ambler Borough have both written letters expressing concerns for the BoRit site. The letter from Ambler Borough was published in the Ambler Gazette.
 - U.S. Senators Specter and Casey were both contacted by Diane Morgan. They sent a joint letter of support to Bob Adams.
 4. **Future Plans Groups-** Chair Sal Boccuti
 - Mr. Boccuti said he had nothing significant to report at this time.
 - This group is still getting organized and its activities are not likely to pick-up until after the NPL decision.
 5. **Removal/Remediation and Monitoring Oversight Group-** Chair Eric Lindhult
 - Mr. Lindhult reported that the Army Corps of Engineers is currently going over the proposed Bank Stabilization Plan.
 - Some of the trees on site have been cut and it looks different. Silt fences were constructed as a soil erosion control measure.
 - This group looks forward to the opportunity to meet with the designers of the stream-bank plan to better understand the plan and the design features.

Removal Action Plan Presentation.

In introducing Mr. Rovira, Co-Chair Fred Conner took a few minutes to talk about the letter sent by himself and Mr. Adams to the EPA on behalf of the CAG. The letter was sent to EPA representative Larry Johnson on July 10, 2008 and expressed serious concerns with the EPA's participation in the CAG process. It was noted that a copy of the letter was available in the packet of info provided to each Member at the start of the meeting. Mr. Conner explained that the letter expressed concerns at that time involving the lack of commitment and coordination on behalf of the EPA. He went on to explain that the letter attempted to reflect a consensus of the Members.

Mr. Conner said in his and Mr. Adam's opinion, the letter was "right down the middle" in terms of the sentiments of the CAG as a whole. Some Members were much more concerned than the letter emphasized and some less so.

Mr. Conner went on to use an analogy he thought would be familiar to all who fly frequently, about the difference between airline pilots who explain what is going on when there is a problem and those who do not keep their passengers informed. He likened EPA's actions over June and July to the pilot, who while doing everything right in his mind, fails to let his passengers know what is going on. As a result, a lack of information existed and concerns and fears began to arise in the community. Conner continued that since the letter of concern, there have been improvements in communication and coordination. These improvements include: a Friday operations update teleconference, frequent postings on the EPA website, tours of the site, conference calls and community handouts and updates distributed through the mail. Mr. Conner concluded by saying that he wanted everyone to be aware of these improvement and he hoped they would continue.

The Removal Action Plan presentation was given by EPA Representative Eduardo Rivera. The presentation focused on the stream bank stabilization that will be taking place on the BoRit site, but also included details on activities that had occurred to date.

Before starting his presentation, Mr. Rivera said he too regretted that the agency had not gotten off to the start that they had hoped they would. He said he agreed with Mr. Conner's comments and that he was committed to continuing the improvements that have been made in terms of communication and coordination with the community. Hard copies of the presentation were available at the meeting.

BoRit Asbestos Stream Bank Stabilization-

- EPA's Mission is to protect human health and the environment.
- EPA field office is located on 324 W. Maple Avenue and has an open door policy.
- EPA is the lead agency working on the site but they are working with numerous other agencies and welcome their comments and suggestions.
- The EPA field office also has a hierarchy of personnel working from the office. The On-Scene Coordinator is EPA Representative Eduardo Rivera, the EPA Representative in charge of health and safety is Jack Kelly and the Community Outreach Coordinator or person in charge of information is EPA Representative Larry Johnson. There are also other employees working out of the field office including more EPA representatives, people from PADOH and ATSDR, and the Army Core of Engineers.
- All work done on site so far has been preparatory work. There has been no digging or excavation.
- Clearing and grubbing activities have taken place on the pile property as well as the installation of two gates and the replacement of fencing.
- No field activities have taken place at the reservoir property.
- The park property has had one additional gate installed. The construction of access roads comprised of fabric laid over the ground and 6" of 2A modified stone laid on top of the fabric has also taken place on the park property. Clearing and grubbing activities have been taking place there as well.

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- Pictures of the new fencing, gates and access roads were shown in the presentation.
- Pictures of equipment being used on-site such as water trucks and generators were also shown during the presentation.
- Other work performed to date includes water suppression and soil cover, air monitoring and sampling, dust suppression on dry days, topographic survey, cross sections of the Wissahickon and weather monitoring.
- Air sampling is taking place up to three consecutive days per week at one upwind and three to four downwind locations. All samples are analyzed by PCM, samples greater than or equal to 5.5 fibers/cc go to TEM analysis.
- Personal air sampling is done in a minimum of two hours per work shift and is analyzed the same way as ambient air samples.
- A total of 30 ambient air samples were taken and one was positive for asbestos. The positive sample was less than 0.0003f/cc and within acceptable risk range. This sample was found across the street from the pile property on Maple Avenue during field activities.
- Six personal air-sampling tests have taken place. The samples were taken from employees cutting trees on site with chain saws and equipment operators using excavators and chippers.
- OSHA Requirements for acceptable levels of asbestos exposure. Time Weighted average limit (TWA) - No employee shall be exposed to an airborne concentration of asbestos in excess of 0.1f/cc of air as an eight hour TWA. Excursion Limit- No employee shall be exposed to an airborne concentration of asbestos in excess of 1.0f/cc as averaged over a sampling period of thirty minutes.
- Air monitoring is performed daily with DataRAM. The machine takes readings every few seconds and is set to average particulates every 15 minutes. An audible alarm is set to go off if 100 micrograms per cubic meter is detected.
If the alarm goes off then dust suppression is preformed to eliminate dust in the air.
- Steam banks adjacent to the site include both sides of Tannery Run and Rose Valley creeks and one adjacent bank of the Wissahickon.
- The stream bank stabilization will be performed in phase sections. The sections work will be completed in are the bank of the Wissahickon adjacent to the park property, both sides of Rose Valley Creek, the Eastern bank of the Wissahickon downstream of Rose Valley to Tannery Run and both sides of Tannery Run.
- The stream bank stabilization is meant to be a long-term solution.
- Hydrologic Engineering Centers River Analysis System (HEC-RAS) which models river systems using a computer-modeling program that FEMA requires for the national flood insurance program is analyzing Rose Valley creek.
- Enough information is available on Tannery Run Creek from a study previously done by Kane-Core.
- The Wissahickon Creek is planned to contain hardened structures such as riprap and concrete filled geo-cells and green structures such as geo-cells filled with stone/soil and bio logs containing a blend of composted material. These structures will stabilize the bank from the 25-100 year elevations. Above the 100-year elevation a turf reinforced mat (TRM) and erosion control blanket will be used.

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- Pictures showing examples of hardened structures, green structures and erosion blankets were shown in the presentation to give the CAG an idea of what each looked like individually and in use along waterways.

Questions regarding the presentation were taken from CAG Members and answered by EPA Representatives Eduardo Rivera, Jack Kelly and Larry Johnson. Mr. Lindhult and Members of the R/R Work group began the questioning.

Q-1. How will the EPA address overturned trees in the future and what type of plantings will be used to vegetate site?

A-1. EPA is working with Fish and Wildlife to come to a sustainable solution. However, EPA is not to the point of planting at this time.

Q-2. What will the maintenance requirements be for vegetation that is placed on-site?

A-2. Low maintenance green plantings are the maintenance requirement for vegetation that will be planted on-site.

Q-3. Since EPA is not excavating stream bank but using riprap, the stream direction will change. Will EPA be protecting the other side of the bank in some way?

A-3. DEP works with streams and at this time they are not doing anything. The stream can be directed a certain way with the use of J-vanes.

Q-4. What is meant by green structure?

A-4. Vegetation along creek where there is construction or man-made materials containing natural substances (soil, rock, compost) instead of artificial (concrete).

Q-5. Who's working in the field office is at the office on a daily basis?

A-5. Eduardo Rivera, Jack Kelly and most others except for the toxicologist, ATSDR and PADOH people who stop by regularly.

Q-6. What is an excavator doing on-site?

A-6. The excavator is used for a variety of different purposes including taking down trees and moving dirt.

Q-7. How does EPA define dry days?

A-7. A scale of 1-4 is used to gauge dryness.

Q-8. Why have only six personal samples been taken?

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A-8. Personal samples are not being taken everyday.

Q-9. Why is the stream bank stabilization aimed at a long-term solution if EPA is supposed to be removing immediate threat and in Removal Action stage is long term supposed to be covered?

A-9. Yes because of this particular situation a long-term solution is necessary.

Q-10. Did Kane Core give EPA the study that was done on Tannery Run?

A-10. It is a public document that anyone can access.

Q-11. Who did the study for Kane Core?

A-11. We will have to check and get back to CAG.

Q-12. Why is removal of the asbestos containing material not an option?

A-12. It is more of a hazard to remove the asbestos. If the site goes NPL then all alternatives from removal from site to no action needed will be considered as part of the process.

Q-13. Is EPA aware that PENNDOT selected a dam on site as a mitigation site?

A-13. Yes, EPA is aware of this and coordinating with PENNDOT.

Q-14. The planting season is into October and early November, is the EPA going to be able to plant everything by then?

A-14. It is probably not all going to happen this season, but EPA will continue next season where they left off.

Q-15. What plans exist to stabilize and cover during the winter?

A-15. We are unsure at this time if EPA will work through the winter, but whatever is cleared will be covered or replaced by the end of the season. EPA will not clear more than can be replaced this season.

Q-16. Why is the only section shown of the Wissahickon? Where are the Rose Valley and Tannery Run sections?

A-16. A complete study on Rose Valley and Tannery Run will take place when completing the work for that section. The stream bank stabilization will be done in sections as explained in the presentation.

At this time the two TASC consultants in attendance were asked to give their thoughts on the EPA's Removal Action Plan. Doug Streaker from Biohabitats Inc. commented that all concepts behind the stream bank stabilization are hardened structures.

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Mr. Streaker noted that hardened structures can be more detrimental to the environment and that there were more sustainable alternatives that should be considered. Mr. Streaker added that hardening one side of the stream bank with constructed material will affect the other side of the bank.

Michele Benchouk from Booz Allen Hamilton commented that according to the *Action Memorandum*, the asbestos containing material on the banks is not suitable to be removed. Mrs. Benchouk would like to know how the suitability was determined. She further commented that her only other concern was that of burrowing animals living on site releasing asbestos in the future.

Because of the lack of time for further questions, or Observer comments, Mr. Conner asked that additional questions and comments be sent to him by Friday, August 8, 2008 for inclusion in the Meeting Summary.

ATSDR-PADOH Health Consultation Report Update.

ATSDR Representative Lora Werner gave an update on the ATSDR-PADOH Health Consultation Report. Mrs. Werner informed the CAG that the report was out and hard copies were available at the meeting along with the 2-page fact sheet. It was noted by Mrs. Werner that the 30-day period to comment on the document was currently underway and August 31, 2008 is the end of the comment period. The EPA 2006-2007 air sampling data from site came out as construction on site began. Mrs. Werner commented that the data is still relevant because it gives a historical picture. She noted that there was a press release of the report and it was also available at the EPA website with the fact sheet, the EPA command post on West Maple and the public library. The document determined that asbestos-containing material on site is not a public threat when there is no soil disturbance. Mrs. Werner will respond to all comments made on the report and will include all comments anonymously in the final version of the report. Comments can prompt new studies and/or methods of analysis. All comments must be submitted in writing or through email.

Mrs. Werner also informed the CAG that the PADOH cancer study document is still with the PA Health Department and has no particular timeline at this point, but it is still moving along and could come out anytime.

CAG Co-Chair Fred Conner informed the CAG that HERS Group Chair Dr. Michelle Naps was working on a document for all CAG Members to submit to ATSDR on the Health Consultation Report. It was also noted by Mr. Conner that if the CAG could not reach a consensus on a document to submit, separate majority and minority responses could be submitted.

CAG Member and HERS group Member, Dr. Ted Emmett inquired as to some concerns about the report completed by ATSDR and the cancer study being completed by PADOH.

- First, Dr. Emmett noted that he was pleased to see that ATSDR recognized a hazard, but did not want to comment in detail due to the document HERS group is preparing in response to ATSDR's report. Dr. Emmett reiterated that from the point of view of risk to health, asbestos must be in the air not the ground or water.
- He went on to explain that stabilizing the bank is fine, but is not sure that whatever is being done will keep asbestos from getting out and be sustainable. How good the bank stabilization is, according to Dr. Emmett is an issue that needs to be addressed.
- Dr. Emmett also noted that the encapsulation of the visible asbestos containing material is very important and should effectively prevent burrowing animals, tree roots and erosion.
- Next, Dr. Emmett commented on the PADOH cancer study. He explained that the position of the HERS Group is to be able to speak with PADOH before the study is completed. HERS Group would like to know about the different variables affecting the outcome of the study such as: "What area is picked out as potential risk area?", "How did PADOH come up with this area?", "Who is PADOH comparing data with?" and "How big is the population sample?" The reason behind wanting to know the details of the study is that any study can be negative if few enough people are sampled. A large enough population to look at gives a study power to detect if something is there. A trick is to use a small population sample in order to not detect anything. HERS group would like to make sure the CAG is happy with the way the study is done because if they are not then they will be unhappy with the results.

PADOH Representatives Barbara Allerton and Christine Lloyd (author of document) responded to Dr. Emmett's comments and questions.

- The document includes all cancers reported to PA Health Registry.
- The study looked at zip codes in a two-mile radius and compared those zip codes with the numbers of reported cancers in the state of PA as a whole.

Questions and comments regarding the ATSDR-PADOH Health Consultation Report and the PADOH cancer study were taken from CAG Members and answered by ATSDR Representative Lora Werner with help from PADOH Representatives present.

C-1. The 19002 zip code extends a two-mile radius.

C-2. PA should be one of the higher asbestos a state, so study is comparing to a higher asbestos state.

Q-1. Will Pittsburgh be included as part of the whole state of PA?

A-1. Yes, PADOH looks at the state as a whole. Once the data is out it can be examined in many ways. It is more like a health statistics review than a study and is a starting point for different methodologies or approaches. An epidemiologist will be available to answer questions.

Q-2. Asbestos is the problem here, so why cancer not asbestosis?

A-2. There is a huge gap between asbestos and cancer related diseases. Look at the study as a starting point for future information on asbestos. Cancer data is collected by zip code, so that is why it is relevant.

Q-3. Are West Ambler residents more at risk then when the White Mountains were remediated?

A-4. No.

C-3. I joined the CAG for the safety of the people, not to oversee who was doing what. Asbestos and other contaminants have been placed in every minority community. What is important is that once the site is capped and covered it must be maintained.

In response to the above comment, Mrs. Werner replied that the good news out of the document is that the risk is not there but the fine line for a potential risk to occur exists.

Q-5. Wasn't there a problem with the sample that was used for the study and isn't it under dispute?

A-5. It was acknowledged that we did not have the driest sample, but that is also pointed out in the report. Data will continue to be included as it comes in and if the site goes NPL there will be a new larger report including kidney and liver diseases.

C-4. I was hoping that the study will be divided into 1-2-3 mile radius points and go further with the methodology and use different hypotheses. I do not want the same type of study.

In response to the above comment, Mrs. Werner commented that she hoped the next document would be more satisfying.

Q-6. As of April 14, 2008 fibers > 5 microns were not measured and I would like to know if the science has improved.

A-6. State of the art technology was used in conjunction with EPA contractors that summarized all fibers and added data sets.

EPA Representatives answered the following questions and comments made by CAG Members.

Q-1. What does air sampling tests up to three days a week mean?

A-1. It means two days on average and if a dry spell were to occur, EPA would do three consecutive days.

Q-2. How quickly do test results come back?

A-2. Fifteen minutes are needed to turnaround air sampling results and at least a twenty- four-hour turnaround is needed for anything that is sent to the lab.

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Q-3. Would EPA shut down field activities if the alarm went off?

A-4. Yes.

Suggested Agenda Item #1: Environmental Justice.

Mrs. Flo Wise noted that the Environmental Justice program began in 1982 because minority communities are more likely to be impacted by environmental pollution. It is the presiding federal agencies responsibility to protect minority communities to the maximum extent possible. Mrs. Wise commented that she would like to have someone come and talk to the CAG about Environmental Justice and wanted to know if it could be fit into the agenda.

Comments on Mrs. Wise's suggestion included: that if someone did come to talk about Environmental Justice it would be pertinent for them to explain how it could help or alter the situation involving the BoRit site and surrounding community and that an Environmental Justice Community would be looked at in a completely different light.

Mr. Conner tried to capture the consensus of the CAG by stating that the Group would welcome a future presentation on Environmental Justice as soon as it could be arranged.

Suggested Agenda Item #2: Third Party Oversight of Removal Actions.

Mr. Boccuti expressed the view that it would be good if the removal action had some kind of outside, third-party oversight that could help the CAG understand the agency's actions. Mr. Lythcott of E2, EPA's prime contractor for the TASC program, responded to this suggestion by noting that the two TASC consultants attending the meeting could help in this regard. Michele Benchouk from Booz Allen explained that she could help the CAG with oversight, document reviews, planning and community outreach. Douglass Streaker from Biohabitats Inc. explained that he could help the CAG with the technical aspects of EPA's design to make them more sustainable and ecological as well as provide expertise to the stream bank stabilization in order to properly restore the stream bank after stabilization.

Suggested Agenda Item #3: Current & future requests for support from TASC Program.

Mrs. McCormick said she thought an independent asbestos expert was needed as soon as possible. She also noted that it would be best if such an expert lived in the community and was familiar with the situation, the CAG should use that expertise. Mr. Lythcott explained that such an expert could be hired under the TASC program. He went on to emphasize the point that it was very important that any consultants utilized by the CAG should be totally independent and not represent any stakeholder group.

Suggested Agenda Item #4: Condemnation of EPA's Actions.

Community Awareness Group leader Diane Morgan commented that the EPA's actions belong to them and they have disrupted and broken a trust that had been established with the CAG. She went on that receiving a letter July 21, 2008 that work started on July 7, 2008 is not good enough. As a mother living within a mile of the site, Mrs. Morgan said that she would have like to have known what was going on. Mrs. Morgan concluded that she supports some kind of further condemnation of EPA's actions.

Other asked what form such condemnation might take. EPA Representative Larry Johnson apologized for the EPA's actions. He said he was uncomfortable that there had been this disturbance. He noted that improvements have been made and EPA will try to do better in the future.

Action Items and Announcements.

CAG Co-Chair Fred Conner mentioned that someone showed up at the EPA Command Post claiming that his firm had been hired by the CAG to do air sampling. Mr. Conner noted that the CAG did not, nor can it hire anyone given its current make-up.

Mr. Johnson announced that EPA would hold a Public Meeting on August 20, 2008 at Wissahickon Middle between 6pm to 9pm to present information to the public on removal activities.

Mr. Conner again encouraged Members, Alternates, and Observer to submit additional questions and comments to him by Friday, August 8, 2008 for inclusion in the Meeting Summary.

At 9:34 pm the meeting adjourned.

Addendum.

Please see the "**CAG Meeting Summary-8-6-08 Addendum**" for a complete listing of all the additional comments and questions posed after the meeting along with responses.