

August 6, 2010

Stacie Pratt
US EPA Region III
Philadelphia, PA,

Dear Stacie,

The CAG would like to thank you for your presentation and allowing the CAG to review the Phase I Data Evaluation Report of the BoRit Site as prepared by CDM, and is in general agreement with their recommendations.

Having said that, the Removal, Remedial and Monitoring Group, and the Health, Environment, Risk and Safety Group, along with the CAG attendees of the August CAG meeting, share the concerns and comments below.

In summary, the CAG looks forward to an explanation of the F & J flags, since a substantial portion of the data sits in these imprecisions, and also would like more detail on which asbestos types and volatile contaminants are present at the parcels. The CAG hopes that Phase I data will not be a major influence in the remedial decision until further information is gathered in Phase II, and shared with the CAG. We further hope that Phase II will better determine the boundaries of contamination in the community.

Thank you again for your willingness to share your findings with our group.

The BoRit Community Advisory Group

CAG RESPONSE
PHASE 1 DATA EVALUATION REPORT
Prepared by CAG RR&M Group

After reviewing the Phase 1 Data Evaluation Report prepared by CDM for the EPA, the CAG RR&M has the following comments and questions. We will key our comments and questions to the **Recommendations for Additional Field Investigation** contained in Section 4 of that report.

“CDM recommends that EPA evaluate asbestos concentrations in soil in areas downgradient from the Park and Asbestos Pile, outside of the Site fence, between the fence and sidewalk, to determine whether asbestos may be migrating offsite via surface water runoff.”

The RR&M Group requests that, based on data collected in this area, sampling continue out into the neighborhood until tests come up clean.

“CDM recommends that EPA evaluate asbestos concentrations in air using activity-based sampling at the three BoRit parcels, at residential properties located adjacent to the Site and on the other side of Wissahickon Creek, and along the Green Ribbon Trail on the other side of Wissahickon Creek and downstream of the Site on the Green Ribbon Trail where CDM observed ACM on the walking trail.”

The RR&M Group requests that EPA define the “residential sampling area” as the Mercer Hill neighborhood and the West Ambler neighborhood. We further request that soil sampling take place down to the Ambler sewage treatment plant on both sides of the Wissahickon Creek. We request soil and air sampling in these locations.

“CDM recommends that EPA install and sample groundwater monitoring wells at the Site to evaluate Site contaminants in groundwater as well as to perform water level elevation surveys to determine groundwater flow direction.”

The RR&M Group concurs with this recommendation.

“CDM recommends that EPA install staff gauges in the Reservoir and in the creeks to evaluate the hydraulic connection of surface water to groundwater.”

The RR&M Group recommends that EPA expand this recommendation to include the following items:

- *Frequent measurement and recording of water levels in the static water body and multiple nearby monitoring wells to observe their mutual relationship,*
- *Evaluation of water chemistry between the surface water and the ground water to detect similarities or “leakage” from one body to another,*
- *Use of unique non-hazardous tracers (at very low concentrations) which could be added to the water in the reservoir and then monitored in the down-gradient wells and creek. If the tracer shows up in surrounding wells and/or the creek, it establishes a connection.*

The RR&M Group further requests that these measurements and correlations be continued over sufficient time to firmly establish the hydraulic relationships between the small creeks, the Reservoir and the Wissahickon Creek.

“There were several small metal debris anomalies identified at the Park and numerous metallic objects and a debris pit identified at the Asbestos Pile from the EM survey...

Further investigation of the subsurface in these areas is recommended.”

The RR&M Group concurs with this recommendation.

“CDM recommends that EPA perform a geotechnical analysis at the Park and the Asbestos Pile to determine slope stability in support of FS alternative evaluation. A geotechnical analysis is not recommended for the Reservoir until additional information is obtained.”

The RR&M Group concurs with this recommendation.

“CDM recommends that EPA sample slag at the Asbestos Pile, observed at the surface during Phase 1 investigations.”

The RR&M Group concurs with this recommendation.

“CDM recommends that EPA sample the former fire training area at the Asbestos Pile for dioxins”

The RR&M Group concurs, but urges the EPA to expedite this recommendation in view of the work presently being done on that site.

“CDM recommends that EPA perform an elevation survey across the Site to obtain elevations for piezometers, monitoring wells, and staff gauges installed during Phase 1 and Phase 2 field activities.”

The RR&M Group concurs with this recommendation.

“CDM recommends that EPA consider collecting background samples for metals to evaluate background metals concentrations for the risk assessment.”

The RR&M Group requests that this evaluation be expanded to include VOC's and SVOC's.

The RR&M Group requests a characterization of the asbestos by type, i.e. chrysotile, amphibole, etc. We would also appreciate a more thorough explanation of the RSL's, including how they are derived and from what data source.

Because a substantial amount of recorded data may not be accurate or precise, the RR&M Group feels that remedial decisions should not be made based on that data. The RR&M Group requests that the EPA re-analyze that data using archived samples for a more precise result.

Below is a summary of the discussion the HERS workgroup held on 7/26/10:

Dr. Emmett, Sharon McCormick, and Lora Werner participated. The next scheduled call for the workgroup is on August 23, 2010.

HERS Workgroup Comments on the EPA Phase 1 report:

1. The environmental data in the report indicate that the boundaries of the asbestos contamination at the site have not been reached. Future EPA investigations should work to clearly delineate the perimeter of asbestos contamination at the site, establishing margins that are asbestos-free. In the future the community is likely to assume that any activity beyond the margin is safe, including digging and excavation. If the perimeter has not been properly established this could lead to on-going health risk from areas which are erroneously considered to be free of continuing risk from any activity.
2. Although we understand that all forms of asbestos pose a risk to humans, because of the differences in potency of the different asbestos fiber types, further analysis should characterize the distribution of fiber types at the site. Areas with a higher proportion of Crocidolite or Amosite might require particular attention.
3. The frequency of detection of relatively high concentrations of asbestos in groundwater raises concerns about exposures via that pathway. The workgroup understands that the groundwater data in this report is preliminary information and not considered suitable for use in risk assessment, due to the sampling methodology. It will be important to clarify the actual level and extent of any groundwater contamination, and to ensure that there is no risk of exposure or use of asbestos-contaminated water at present or in the future. Future uses of concern would include situations where asbestos contaminated water could be used and then evaporate leaving dried fibers that could become airborne, and well as potential for ingestion of this water.

Thank you. Lora Siegmann Werner, MPH