

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

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**ATTACHMENT (2) TO CAG RESPONSE OF DECEMBER 27, 2007**

***RE: Removal Actions Under Consideration for the BoRit Asbestos Site***

**AREA OF CONCERN #1: Effective and environmentally sensitive stream-bank stabilization.**

- 1.1. All project work should proceed with respect for the natural environment of the Wissahickon Watershed.
- 1.2. Bank stabilization should be done in an environmentally sensitive manner, similar to the alternatives presented by USEPA. However, the stabilization must be able to withstand the potentially severe weather conditions, including heavy storm water volume, flooding, and high wind events.
- 1.3. Some type of dense, thorny vegetation should be considered for installation along the stream-banks. Such vegetation would make it difficult for trespassers to get to the embankments, or to disturb the cover that is to be installed. This vegetation would also help stabilize the embankments and would prevent erosion. (Please see Appendix A for a list of suggested native plant species).
- 1.4. Based on the information the CAG has at this time, we can only offer partial support to USEPA's proposed stream bank restoration plan. We strongly support the concept of the plan, which calls for vegetative cover rather than hardening the entire stretch of stream-bank (as was done downstream at the Locust Street pile). Until we are presented with a finalized plan, naming specific products to be used and specifying the method of installation, we cannot give complete support to this part of the project. The CAG requests that EPA keep us informed as more detailed planning proceeds, so that we may better evaluate and comment on the products and installation methods as they are developed.
- 1.5. The CAG understands that in the near future, PennDOT will be removing the dam in the Wissahickon Creek that is situated directly behind the BoRit Site. USEPA should coordinate its streambank restoration with the dam removal so as to provide the best possible streambank protection during and after its removal.
- 1.6. The CAG also strongly recommends a minimum 5-year monitoring period, to be performed by USEPA on a semiannual basis, and as necessary after any major flooding event. The restoration project should be evaluated for structural integrity, establishment of continuous vegetative cover, and the elimination of any asbestos exposure in the project area.

- 1.7. An Erosion and Sedimentation Control Plan, prepared in accordance with PADEP regulations and approved by the Montgomery County Conservation District, should be implemented and monitored so as to minimize erosion and prevent excessive sedimentation into the receiving watercourses or bodies of water.
- 1.8. Early and frequent coordination should take place with resource agencies including the U.S. Army Corps of Engineers, PADEP, PADCNR, PA Fish & Boat Commission, and the PA Historical and Museum Commission.
- 1.9. Authorizations should be obtained by/from all federal, state, county, or local agencies required by law before work begins on the proposed actions.

**AREA OF CONCERN #2: Complete and effective encapsulation or removal of all exposed asbestos-containing material.**

- 2.1. The proposed encapsulation and removal process should be done in a way that will not hinder or preclude more comprehensive remedial efforts in the future.
- 2.2. Encapsulation and removal methods should be done in such a way as to not cause more problems than they solve. That is, they should be done so that material being encapsulated or removed does not become airborne or pushed-off into the creek. The CAG assumes that USEPA has the expertise necessary to effectively supervise the work to be done and protect human health and the environment during the implementation phase.
- 2.3. The CAG requests the opportunity to review and comment on the detailed plans prior to the start of work. This opportunity will provide us with a better understanding of how USEPA will protect the community during the encapsulation and removal activities.
- 2.4. The CAG requests that status updates on the execution and monitoring phases of the encapsulation and removal process be made available to the CAG at least one week prior to our monthly meetings.
- 2.5. The USEPA may find it useful to designate a qualified individual or firm to perform the functions of an Environmental Monitor for the removal and encapsulation actions.

**AREA OF CONCERN #3: Comprehensive monitoring during and after removal actions.**

- 3.1. Continuous, comprehensive, and long-term monitoring should be conducted by USEPA during and after removal activities to minimize exposure risks. Periodic monitoring should be performed subsequent to the removal work to test the effectiveness of the remedy.
  - 3.1.1. Future sampling should be planned in collaboration with the CAG to ensure that all appropriate areas are tested. Efforts must continue to be made to address the community's ongoing high degree of concern about the Site and to promote an understanding of the health and environmental variables to be considered.
  - 3.1.2. From a toxicology standpoint, the risk calculations contained in the latest sample data do seem to have followed the "worst case scenario" approach. However, the methodology used to conduct the sampling may have underestimated some major factors known to community members (e.g. particular locations where asbestos content is believed to be high; weather variables such as dry, windy conditions; and children and animals physically active in contaminated areas).
  - 3.1.3. Independent testing and analysis of the Site and the surrounding areas would be helpful in addressing the ongoing community concerns.
- 3.2. The CAG fully understands that USEPA is not an agency with a clinical research mission. However, we encourage the agency to coordinate with all of the health agencies involved to implement a more in-depth, health data collection protocol.
  - 3.2.1. Community health data analyzed thus far, in studies by the health agencies involved, do not reflect the true incidence of mesothelioma, asbestosis, and other non-cancer asbestos-related diseases historically associated with the Site. Thus, there is reason to believe that the community health metrics currently in place cannot adequately estimate current or future disease.
  - 3.2.2. We encourage USEPA, along with all of the agencies involved, to take a more aggressive approach to new data collection (e.g. household surveys and coordination with medical staffs at local hospitals) to understand the community asbestos-related disease burden. In addition, assessment of liability payments for asbestos exposure in this region would be another data resource. Members of the CAG report index cases where specific individuals in our community were recently diagnosed with asbestos disease where proximity to the BoRit Site is believed to be the only known risk factor. The CAG and other stakeholders should be provided with the health data resulting from these studies.
  - 3.2.3. The site should remain under USEPA and PADEP surveillance with active involvement by the agencies in long-term monitoring. This should include air sampling and indoor and outdoor dust wiping at times and locations where uncovered asbestos waste is evident from visual inspection or previous soil tests.

**AREA OF CONCERN #4: Collaboration with all of the responsible government agencies and property owners on the establishment of institutional controls.**

- 4.1. Institutional controls (ICs) should be an integral part of any cleanup action at the BoRit Site, including the removal action currently planned by USEPA and any future remedial action that may be taken. The removal action currently calls for the capping of any exposed asbestos and the stabilization of creek and stream banks on the three parcels that comprise the Site. As a result, contamination at potentially high levels will remain in the subsurface on the Site. If not properly addressed, any possible future use of any of the three parcels could cause soil disturbance, erosion, or degradation of the soil cap (even if only during the construction phase), thereby again exposing the asbestos and threatening human health and the environment.
- 4.2. The CAG recognizes the fact that this Site is located in three municipalities and is comprised of three parcels with three different owners. It is likely that one or more of these property owners will want to develop their parcel for future use. For instance, the CAG is aware of the interest by Whitpain Township and residents near the Wissahickon Park parcel to use that parcel as some type of youth recreation facility. If a use can be accomplished without degrading the soil cover and without endangering the health and welfare of residents and children, then the CAG would support such a future use.
- 4.3. The CAG proposes that the ICs to be considered by the USEPA, PADEP, and the municipalities in which the Site is situated, include the following:
  - (a) Any development plans for the parcel must establish that such development can be safely accommodated;
  - (b) During the removal action and as part of any future use of the Site, at a minimum, the following construction practices should be considered:
    - (1) Limitations of work on days with high winds;
    - (2) Dust control, wet down, and daily soil cover requirements to prevent asbestos from becoming airborne;
    - (3) Notices to nearby residences, businesses, all effected municipalities, and the county of excavation times and dates;
    - (4) Stormwater management, soil erosion, and sedimentation controls specifically designed to prevent degradation of the cover;
    - (5) Continuous air monitoring with public notification of any releases;
    - (6) Washing for all vehicles and equipment exiting the Site;
    - (7) A cap or liner with thicker soil overlay for any open areas to be used or accessed by the public (e.g. ball fields);
  - (c) No wells on any parcel;
  - (d) Deed Notices advising of the restrictions on the parcels' use.

- 4.4. The CAG recognizes that, in order to implement the ICs, cooperation and coordination will be needed between the three municipalities, the PADEP, the USEPA and the site owners. However, under CERCLA, the USEPA has the authority to impose ICs at contaminated sites. Further, the PADEP has statutory authority to impose ICs at this Site and to monitor for compliance. The three municipalities have the authority under the zoning, subdivision, and land development provisions of the Pennsylvania Municipalities Planning Code to impose ICs on these parcels to protect human health and the environment. The CAG requests that the USEPA initiate discussions with the PADEP, the three municipalities, and other stakeholders, to facilitate inter-governmental cooperation in order to implement the proper ICs at the Site. The CAG is willing to assist in this process to the fullest extent. USEPA is requested to work closely with the CAG and local governments in the development and implementation of institutional controls for the Site.

**AREA OF CONCERN #5: Continued partnership with the CAG to produce and promote long-term solutions.**

- 5.1. Support of a Multi-government/Multi-stakeholder Planning Process that leads to a Long-Term, Sustainable Solution.** Because the BoRit Site is segmented by municipal demarcation and scarred by industrial contamination and neglect, the natural environment in which it rests has not received the attention or appreciation it deserves. Nonetheless, the landscape at its core survives and could very well thrive if considered as a whole and integrated into the planning of the surrounding municipalities. This landscape is a vital component of the regionally significant Wissahickon Green Ribbon Preserve and critical part of over 60-acres of open space between Butler Pike and Mt. Pleasant Avenue. The removal concept proposed by USEPA must be a catalyst for real and meaningful follow-on actions. These actions should include a far-reaching, multi-municipal planning effort that addresses not only BoRit's 38-acres of brownfield's and waters, but as importantly, how they relate and connect to the adjacent developed and natural environments. The use of parts of the Wissahickon Park parcel as some type of youth recreation facility should be considered an integral part of any future plans for the area. It is time for area leaders to engage in an earnest and professional, multi-government/multi-stakeholder planning process to deal with the blighted open spaces in our midst. The CAG encourages USEPA to participate fully in this long overdue process. The agency could be especially helpful in this regard by providing examples of how similar sites have been transformed.
- 5.2. Continued Assessment.** The CAG strongly agrees that a National Priorities List (NPL) listing, a full remedial investigation/feasibility study (RI/FS), and remedial action is ultimately in the best interest of our community. It is important that assessments of the Site for inclusion on the NPL continue in parallel with the removal actions proposed. The CAG acknowledges that the removal actions do not preclude the Site from being listed on the NPL. We look forward to the presentation by the Site Assessment Branch at our January 2, 2008, meeting.

- 5.3. Continued Surveillance.** The Site should remain under USEPA surveillance with active involvement by the agency in long-term monitoring and coordination with the community. Under no circumstances should the Site revert to the level of primary oversight by the Commonwealth of Pennsylvania unless and until the commonwealth's National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations are made more stringent.
- 5.4. Continued Investigation.** While the removal actions proposed represent a significant investment by the federal government, even at their conclusion, the Site will remain a fenced-off, contaminated brownfield in a densely populated and otherwise robust community. All available funding sources should be assessed, including the investigation of old liabilities that may carry forward to current business operations, in order to contribute to the funding of a sustainable, long-term solution.

**APPENDIX (A)**

**SUGGESTED NATIVE PLANTS  
FOR BORIT AREA RESTORATION**

The following plants were chosen on the basis of their fitness for use on and around the BoRit Site, which is a lowland area with some flood inundation. Another criterion for selection was “thorniness” which is meant to help deter persons attempting to gain access to the Site. These plants should be planted starting at the top of bank and continuing back at least 20 feet to give the thickness necessary to act as an effective deterrent.

<b><u>COMMON NAME</u></b>	<b><u>LATIN NAME</u></b>
Honey Locust	<i>Gleditsia triacanthos</i>
Swamp Currant	<i>Ribes lacustre</i>
Missouri Gooseberry	<i>Ribes missouriense</i>
Wild Plum	<i>Prunus americana</i>
Brainerd’s Hawthorn	<i>Crataegus brainerdii</i>
Red-fruited hawthorn	<i>Crataegus coccinea</i>
Greenbrier	<i>Smilax rotundifolia</i>
Swamp Rose	<i>Rosa palustris</i>
Virginia Rose	<i>Rosa virginiana</i>