

**Borit Asbestos Superfund Site Citizens Advisory Group Meeting
Ambler, Pennsylvania
Upper Dublin Township Building, 801 Loch Alsh Avenue, Fort Washington,
Pennsylvania
August 5, 2015**

Welcome and Announcements

The meeting was called to order at 6:35 p.m. Marilyn Amento will be Lynn Hoffman's alternate. She is an Upper Dublin resident who lost her husband to mesothelioma. She has been an ADAO volunteer for 12 years.

Corrections to June minutes: CAG member Gordon Chase, current chair of the RR&M work group, requested a paragraph from the January, 2015 RR&M meeting minutes be read into the current meeting minutes. The paragraph is taken from the RR&M work group meeting of January 29, 2015.

"It having been revealed that the Ambler Crossing project is now approved by State and local authorities under the PA ACT 2 program and that EPA are not involved in the approval process, the chairman felt that the question previously discussed by the RR&M at last month's meeting as to whether this should be a project handled by EPA or DEP, becomes somewhat moot."

After the chairperson read the paragraph, Ms. Sharon McCormick and Dr. Ted Emmett voiced their comments and objections. A vote took place regarding approval of the June minutes, with one "nay".

The issue of RR&M hiring an unbiased note-taker was suggested and tabled.

Gessner Industries

Gessner Industries company, located in Ambler, uses ground water in the process of manufacturing melamine. An EPA evaluation shows that the ground water under the BoRit site is affected, and they requested that the water intake and discharge be checked for contaminants, because BoRit is contaminated. The EPA and PADEP have not reached an agreement as to which agency is responsible, but PADEP issues the permit. As Gessner's permit expires soon, a suggestion was to ask that water intake and discharge be monitored and samples be taken before the permit is renewed. Ms. Sharon McCormick asked whether it was necessary to wait for the permit to be renewed. Mr. Gordon Chase stated that the permit measures temperature and pH. As of October 17, 2014, PADEP said they were not

responsible, and September 9, 2014 EPA was not responsible.

Mr. Pat Patterson, the PADEP representative, stated that the company used a closed loop cooling system and that there was no legal basis for the request. He had spoken to Sashin Shankar, Assistant Director of SE PADEP, who stated that the MW7 permit is for discharge of cooling water and it is not an appropriate determinant of contaminants (hydrocarbons as well as asbestos) because they are being discharged into Wissahickon creek, and that the EPA is the appropriate authority. It was asked whether Gessner has been asked to check, because they could contaminate their own equipment. Mr. Pat Patterson stated that the water is only used to cool machinery and doesn't touch equipment. Mr. Joe McDowell said that TCE's and PCE's, not asbestos, were found in the wells, and that it isn't conclusive that Gessner is responsible. Gessner is in compliance with its permit. Mr. Gordon Chase said that it is a PADEP issue. Mr. Pat Patterson stated that he will be looking into asking the authorities to change the permit to do water testing.

UPenn Study

Dr. Anil Vachani, a physician in Pulmonology at UPenn, was introduced. UPenn had secured a grant for an epidemiological study of Ambler residents in close proximity to the BoRit site. The study would be for individuals who have lived within a ½ to 5 mile radius (first focusing on closest residents and eventually expanding), who have resided there for a minimum of 5 years, who don't have prior exposure to asbestos from work. Volunteers for the study would fill out a questionnaire, have their medical history taken into consideration, have a CT scan of chest to test for non-cancer changes such as thickening of the lining of lungs, and then determine what action to take. There would be reimbursement for time and travel.

One question was whether direct occupational exposure would be considered a different matter than secondary exposure through a household member. It was also asked whether longtime residents who had moved away would be considered, however it was believed that such residents would be difficult to track down. Another question was whether children would be considered for this study, but because symptoms take ten to fifteen years to develop, the study will seek residents 18 or older, preferably older. Ms. Marilyn Amento suggested that the study move to Ambler because of the difficulty of traveling to Philadelphia, but Dr. Anil Vachani responded that it would be expensive to set up a research site in Ambler because of the specialized equipment involved.

Bast Parcel Clean-Up Plan

Peter Lowry was scheduled to lecture on an environmental covenant, however Steve Maroldo made some comments first. He had had a meeting with John Zaharchak and RT Environmental. The objective was to discuss Dr. Maroldo's comments on the cleanup plan. (build safely on Bast, and he sought clarification on what that would mean.) His understanding was that the clean-up plan would be generally explained.) The issues he discussed were:

Contaminants - Arsenic was found, and he was told this was a result of (wood) coal ash. The clean-up plan was a modification of the exclusion zone. Relating productivity to the safety plan was wrong in the first place and gave the wrong impression. The sequence of events being numbered implied loopholes, and the exclusion zone could be shrunken. If the boundaries were known, it could be known what PPE is required to operate on the site.

Visibility of dust as detection for airborne asbestos - Gary of RT Environmental Services had said that the visibility test (is) may not be comprehensive (and) but yields an immediate result, whereas analytical results require waiting until the next day. Dr. Steve Maroldo agreed that it was a tradeoff between expediency and analytical accuracy.(expressed uncertainty of whether this was comprehensive). Could asbestos be present in the air without dust, and if present in dust, how does it transport—the same as dust, or further than dust? If so, there was a density and mobility problem, because it could be transported off site without detection. Offsite detection was not specified in the clean-up plan, and Dr. Steve Maroldo recommended that it be specified.

Decontamination

1. *Buildings*. Gary had said that analysis showed no signs of asbestos, and the buildings have yet to be taken down. If so, the buildings can be contaminated during grading, and the current results are meaningless. John Zaharchak had told him “we will make sure buildings are wet down to protect from airborne asbestos.”
2. *Equipment used during project to grade and cap the site*. When looking at equipment, this would include undercarriage and tires. The cab and interior of equipment were not mentioned, but a contaminated operator could contaminate the inside of the equipment. (Dr. Steve Maroldo suggested) John Zaharchak said the protocol be that an operator could only enter and exit in a clean area. (He) Dr. Maroldo was not sure whether this was workable protocol, but the issue was raised.

Post-remedial Care - According to ground field literature, where cap and prevention of a transport issue is present, the cap has to be preserved intact and maintained. The cleanup plan specifies an annual inspection, which protects for one to three years, but not for 15 or 20. The reason for failure is degradation of the protective cap, as asbestos doesn't automatically transmit through the soil. Gary agreed to quarterly inspections, but Mr. Steve Maroldo found that insufficient.

Environmental Covenant

After these comments, Peter Lowry gave his presentation. Mr. Peter Lowry has been a Whitpain township resident for 20 years, and was here to introduce a plan for an Environmental Covenant. He gave some background on the Environmental Covenant Act, which addresses promises between the PADEP and the developer or owner of property. The state website has descriptions and templates for the covenant. The covenant covers not just the current owner, but all subsequent owners. As time goes on, the properties can be sold to less scrupulous people. The Covenant is protection for the future. Mr. Peter Lowry suggested the group get involved and ask to institute 16 items in the EC. The Ambler Boiler House EC was a few pages, but Mr. Peter Lowry wanted a more controlled EC for Bast/Fruman, as the EC is the last control that can be implemented. During the final report, the EC states what was done and the maintenance that needs to be done so that the risk of exposure does not increase in the future. During sale of the property, the EC will show in the title search. Mr. Peter Lowry suggested the proposed CAG request involvement in the EC and put together a list of items from the template that they want incorporated.

Ms. Diane Morgan asked if there was a right to inspect and review the Covenant before it was signed and adopted. Mr. Peter Lowry answered that they are public documents, and decisions are open to appeals. Ms. Diane Morgan asked if there is a 30 day public comment period and whether citizens would be able to see whether suggestions were incorporated, and suggested forming a committee.

Ms. Diane Morgan asked whether BoRit CAG desires a list of items to be included for Ambler Crossings. The final document can be reviewed before submission for additional comments and requests. This was voted on and approved. It was decided that the EC committee would not need to meet until at least March 2016 because construction would not be done for some

time. The covenant is on the construction of the building. Remediation is not construction, and construction will not be done until remediation is improved.

It was asked whether or not there would be two phases of the Covenant.

Mr. Peter Lowry mentioned an agreement on utility pipes, that two additional feet would be added in addition to the amount that is required. Mr. Chase suggested this was not adequate, because the cap could be punctured if the pipes were being fixed. Mr. Lowry agreed. A copy of Mr. John Zaharchak's plan included five additional feet.

RR&M Work Report.

Mr. Gordon Chase mentioned that the report is on the website from the July meeting. The basics of the report: RI addendum review. There was no comment. Some maps didn't show the pipe that exists from Maple Street to the reservoir.

The Fruman parcel was subject to violations and fines. Mr. Joe McDowell said that discussions continue regarding other violations. Mr. Gordon Chase is doing research on ambient air monitoring. A concern is that there is no way to detect asbestos in ambient air the way carbon monoxide is detected; the only alternative being TEM tests or visible dust tests. Mr. Gordon Chase mentioned a UK company with an EU grant to do research on detecting ambient air asbestos. Beta testing is currently being done on this equipment. The company is interested in working with the EPA and CAG to test equipment in the US, but the equipment is earmarked for use in the UK. Professor Rito Gierre found another type of equipment to measure average weekly asbestos, which would provide static monitoring of superfund sites. Mr. Gordon Chase would like protocols from the UK company, with nondisclosure agreements and permission from the UK university to discuss this matter with UPenn. Mr. Gierre is hoping to gain access to the other machine. It was asked if there is any patent literature. Mr. Gordon Chase answered that the proof of concept is proven through laser light dispersal, magnetic imaging, and has been peer reviewed by the University of Hartfordshire. More information is to be brought to the October meeting.

Closing

Sal Boccuti reminded everyone that a vote for co-chairs will occur at the October meeting. Nominations are being taken, and a member or alternate can nominate. Nominations are to

be sent via e-mail to Kim Hirschberg or Mr. Sal Bocutti by September 14th, so that there is a 30 day period to put it up for vote. Nominees will be contacted, and respond if they accept. The vote will take place at the October meeting.

Ms. Diane Morgan mentioned that a note-taker was hired, and that members are encouraged to contribute to pay, as well as contributing to the website.

A discussion about BoRit ensued. Ms. Diane Morgan asked about the water level. Mr. Joe McDowell said that Eduardo Rivera is working on reservoir berms for the floor of the reservoir and island, to refill when finished. Mr. Joe McDowell mentioned that a hydro-geologic study showed that there was not much fluctuation in water levels, but that ground water reduced when Gessner pumped. There was a foot drop in water levels in 2010 or 2011 due to a drought. A gage monitored water levels without significant change. Conditions are not anticipated to change.

A feasibility study is a comparison of alternatives done at a broad level, then done to smaller groupings of alternatives that are evaluated. The feasibility study is to be released in the fall time frame and will be shared with the CAG. The plan for a proposed remedy will be released in 2016. There is a 30 day comment period.

Eric Chung mentioned that the Chemical Heritage Foundation's publication, Distillations, includes a story about Ambler's situation.

Mr. Gordon Chase mentioned what he took to be a correction about asbestos in Valley Forge Park (http://articles.philly.com/2010-04-10/news/25212248_1_asbestos-field-cleanup-national-park-service), made by Ms. Sharon McCormick in the email she sent about the asbestos contaminated soils in the park. Instead of being cleaned up entirely, 97.5% still remains in the park. Mr. Chase gave some background on the Valley Forge subject: the initial EPA action was in 1997, and 52,000 cubic yards are affected. Ongoing work is being done with the excavation and deposition into a waste site. The soils are contaminated there, but not stockpiled like in Ambler.

Ms. McCormick stated that excavation of asbestos contaminated soils at Valley Forge Park is occurring, and that the excavated soils are being stockpiled elsewhere within the Valley Forge park. The point being that if dirt caps were so effective, why excavate at Valley Forge Park, Why not just cap it with dirt?"

As the time was growing late, the chairperson decided to continue the discussion at the October meeting.

The meeting adjourned at 8:35 pm.