

BoRit Asbestos Superfund Site Community Advisory Group Meeting

Ambler/Upper Dublin/Whitpain, Pennsylvania

Date: Wednesday, February 6, 2013

Location: Upper Dublin Township Building, 801 Loch Alsh Ave. Fort Washington, PA 19002

Meeting called to order by Co-Chair Bob Adams at 6:32 p.m.

Item #1: Welcome & Announcements

Co-Chair Bob Adams began the meeting by asking any new CAG members or attendees to introduce themselves. There were no introductions given at this time. Previous CAG meeting minutes were not discussed.

Item #2: Removal Action Report - Mr. Eduardo Rovira, Jr. of the US Environmental Protection Agency (EPA)

Co-Chair Bob Adams introduced Mr. Eduardo Rovira, Jr., EPA's On-Scene Coordinator (OSC) for the BoRit Asbestos Superfund Site, to the group to give a presentation on the current state of removal activities.

Questions and comments regarding Mr. Rovira's presentation are as follows:

³⁵₁₇ Mr. Dave Froehlich inquired about trees along "Maple Alley". Mr. Rovira responded that an area next to the fence will be excavated and backfilled and trees will be planted in this area. Mr. Rovira noted that the excavation depth would be approximately two feet and that this should be an acceptable depth to support the trees being planted there, per information given by to him by Whitpain Township.

³⁵₁₇ Mr. Gordon Chase asked if the width of the road itself would be reduced. Mr. Rovira responded that the width of the road would not be reduced. In fact, the width of the road would increase by an average of 2 inches.

³⁵₁₇ Mr. Gordon Chase asked if the fence surrounding this area would be removed or replaced. Mr. Rovira responded that the fence would ultimately be removed, per Whitpain Township's request, when activities are completed. Currently, a temporary fence is erected but that is being removed section by section as activities are completed.

³⁵₁₇ Ms. Susan Curry asked if, during removal activities, he or his team had reached a depth where no Asbestos Containing Material (ACM) could be found. Mr. Rovira noted that they are only digging to depths that particular removal activities require, for instance the installation of a fence, and does not know if there is any contaminated materials below those depths.

³⁵₁₇ Mr. Gordon Chase asked if it was safe to assume that the road along “Maple Alley” was built on top of waste. Mr. Rovira responded that he was not sure how far into the roadway the waste extended and that the only way to know for sure would be to excavate the road.

³⁵₁₇ Mr. Joe McDowell of EPA commented that the road in question has more than likely been there since 1910 or 1920 citing photos from the 1940’s that show houses built along that road approximately twenty years prior to the taking of the photographs. Mr. Gordon Chase recommended that testing could be conducted at a depth of a few feet on the opposite side of the road to determine how far the contamination has spread. Mr. McDowell noted that Whitpain Township does not own the entire road, but only a half of the road up to the center line.

³⁵₁₇ Ms. Susan Curry asked where exactly the geotextile material would be located in the 2 feet of excavation Mr. Rovira had noted in his presentation. Mr. Rovira explained via a slide in his presentation that the geotextile material would be placed at the bottom of the excavated soil. Ms. Curry asked if 2 feet of soil was sufficient growing space for the trees that would ultimately be placed there and Mr. Rovira responded that he had verified this information with experts on the matter and that 2 feet of soil would be sufficient.

³⁵₁₇ Ms. Sharon McCormick commented that the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) require that the Site be fenced. Mr. Rovira responded that the NESHAPs do not require the Site to be fenced. Ms. McCormick disagreed, stating she had researched this matter heavily and had investigated that particular matter twice. Mr. Rovira responded that he is going above what NESHAPs requires with the addition of 24 inches of soil to the excavated area. Ms. Lynda Rebarcheck of the Pennsylvania Department of Environmental Protection (PADEP) corroborated Mr. Rovira’s comments that NESHAP requirements were being met.

³⁵₁₇ Mr. Chase inquired if the fence in question would be removed to Butler Pike. Mr. Rovira responded that it would not. Current plans are to only remove the fence to Rose Valley Creek. Mr. Rovira noted that he did offer to replace the fence in this area after his work was completed but a request was made by Whitpain Township to not replace the fence for purposes of a park on the area in question.

³⁵₁₇ Ms. Sharon McCormick inquired if there had been any scientific research or studies to see if wild animals might burrow through the 2 feet of soil and geotextile. Mr. Rovira responded that no studies of that nature had been conducted and there does exist the possibility an animal could burrow beneath the geotextile.

³⁵₁₇ Mr. Peter Lowry asked if there was going to be any formal communication between Whitpain Township and the residents of the area when the fence surrounding this portion of the Site is removed. Mr. Rovira noted that once all removal activities are completed, EPA will create an informational Fact Sheet that will be sent to all residents and officials in the area. The reasons for any removal of fencing will be explained in this Fact Sheet.

³⁵₁₇ Mr. Gordon Chase noted that other fenced portions of the Site will become accessible once the fence surrounding the park is removed. Mr. Chase commented that this will be confusing to residents and does not send a very coherent message.

³⁵₁₇ Ms. Sharon Vargas asked if the solutions Mr. Rovira had described in his presentation were safe. Ms. Vargas further inquired that if all of the problems being discussed during this meeting might occur, would the park ultimately be a safe place to visit. Mr. Rovira noted that he does not think they will have any problems with erosion. Regarding animal disturbances, Mr. Rovira noted that it is possible they may see groundhog holes and that maintenance of this area will be essential in diminishing these possibilities. Ms. Vargas asked if Mr. Rovira would take his own children to this park once work has been completed. Mr. Rovira responded that he would. Ms. Vargas asked if the community had been consulted in regards to this plan. Mr. Rovira noted that discussions with the community have been on-going for years and gave many examples of various community meetings held regarding this issue. Ms. Vargas asked if the park would be safe, noting that Mr. Rovira was not saying it would be safe. Mr. Rovira responded that the park and the remedy would be safe, but reiterated that maintenance of the remedy was essential to maintaining the safety of the park. Mr. Vance Evans of EPA commented that he is currently investigating alternate methods to communicate with the community. He noted that many residents only get involved with such matters at the end of a long process and he is looking into methods to change this.

³⁵₁₇ Ms. Sharon McCormick asked where this type of remediation had been done in the past. She noted that she has been researching this issue for 10 years and only the Valley Forge NHP Site is “sort of” similar to the BoRit Asbestos Pile Site. Ms. McCormick noted that she is not sure why they are not considering a full removal of all ACM. She commented that EPA has science that is “all over the place.” She asked why other sites of similar nature have been condemned while this site is going to be transformed into a park. Mr. Rovira stated that she may be interpreting NESHAPs in a different way.

³⁵₁₇ Ms. Sharon Vargas asked if this remediation was an experiment on the African-American community living in proximity to the Site. She inquired if, in particular, it was an experiment on how to cap off a site and reuse it or is this particular cleanup option one that has worked in the past. Mr. Rovira responded that this is in no way an experiment.

³⁵₁₇ Ms. Diane Morgan asked if removal activities would allow Whitpain Township to continue development on the Site. Mr. Rovira noted that there will be Institutional Controls (ICs) placed on the Site by EPA that will restrict development on the Site. Mr. Rovira noted that he cannot say what restrictions those may be at this time but that he personally would rather not see any building in that area. Ms. Morgan asked if EPA would be monitoring the Site once all work on the Site has been completed. Mr. Rovira noted that EPA conducts a Five Year Review on each of its sites to ensure the remedy chosen is still protective of human health and the environment.

³⁵₁₇ Mr. Gordon Chase made the comment that the fact that this particular remedy has not been done before is not reason enough to reject it. He noted that the fact that it may be the first occurrence of the remedy is not the argument to be having. Mr. Chase agreed with Mr. Rovira, noting that it will be a matter of maintenance on the part of Whitpain Township to ensure the safety of the Site. He commented that many local residents will be looking to Whitpain Township to see how they respond to this matter, and that should be enough incentive for the Township to make sure maintenance is performed regularly.

³⁵₁₇ Ms. Susan Curry asked if rain water that will be channeled by the curb that is being installed along “Maple Alley” will add to flooding of neighborhood properties across the street. Mr. Rovira responded that water flow will be the same as it was.

³⁵₁₇ Ms. Sharon McCormick asked who would be liable if a major storm were to cause major damage to the Site. Mr. Rovira noted that EPA would conduct repairs if any failure occurred due to the design of the remedy or was due to something implemented during construction.

³⁵₁₇ Ms. Sharon Vargas commented that she sees the park as a place where people could get sick. She asked again if the park would be safe. Mr. Rovira responded that there would be deed restrictions placed on the land after work is completed. He stated that he does not believe that side of the Site will be developed. Mr. Rovira explained that once deed restrictions are in place, they will remain in place with the land indefinitely. Mr. Rovira reiterated that as long as maintenance is kept up, it will remain safe.

³⁵₁₇ Mr. Peter Lowry noted that Whitpain Township had this portion of the Site listed as a potential park in their slide presentation from a previous CAG meeting. Mr. Lowry noted that he feels the CAG is jumping ahead to remediation. He noted that it is critical to communicate to the public that this is a only a temporary solution, per Whitpain Township, and that we are not maintaining a remedial action, but a removal action.

³⁵₁₇ Co-chair Bob Adams noted that Ms. Sharon Vargas had not been at the previous meetings in which these issues were discussed and reiterated the point that this was a temporary solution.

Mr. Adams thanked Mr. Rovira for his presentation and for making the Site much safer.

Item #3: EPA Activity Based Sampling (ABS) Overview/EPA Response to CAG Request for Groundwater Evaluation – Ms. Kristine Matzko

Co-Chair Bob Adams introduced Ms. Kristine Matzko, EPA's Remedial Project Manager (RPM) for the BoRit Asbestos Superfund Site, to the group to give a presentation on activity based sampling (ABS) that had occurred at the Site.

Questions and comments regarding Ms. Matzko's presentation are as follows:

³⁵₁₇ Ms. Susan Curry asked if dust could become attached to the sides of the hose attached to the monitoring device described in Ms. Matzko's presentation (this never making it as far as the collection filter). Ms. Matzko responded that it could not, as the devices are filtered. Ms. Matzko then gave a brief discussion of how the air filter works.

³⁵₁₇ Mr. Gordon Chase asked if the tests described by Ms. Matzko were conducted prior to removal activities at the Site. Ms. Matzko responded that they were.

³⁵₁₇ Mr. Sal Boccuti inquired that if the Remedial Investigation is drafted, as indicated by Ms. Matzko, does this also mean that all testing is now complete. Ms. Matzko responded that all air sampling had been completed. She also noted that EPA plans to test monitoring wells on 3 more occasions, and is currently planning on finding background locations to test background water and soil. Mr. Boccuti asked what remedial work is planned once removal activities are completed. Ms. Matzko replied that EPA is required by law to go through the remedial process, which will include a Remedial Investigation (RI), Risk Assessment (RA), evaluation of alternatives (Feasibility Study[FS]), and an evaluation of the covering and capping of the Site. Ms. Matzko added that further testing helps inform EPA in regards to the specifics about contamination and different alternatives will be considered at that point. Mr. Boccuti asked when the Remedial Investigation report would be ready for the public to view. Ms. Matzko noted that the final report is still in review and that it would be several months before the report was finalized. Mr. Boccuti inquired if, in essence, Ms. Matzko had completed her testing and Ms. Matzko replied that was a fair statement.

³⁵₁₇ Ms. Sharon McCormick inquired if the Activity Based Sampling results would be included in the final Remedial Investigation report. Ms. Matzko responded that it was included in both the Remedial Investigation and the Removal Investigation. Ms. Lora Werner of the Agency for Toxic Substances and Disease Registry (ATSDR) also noted that this data would be included in their Health Assessment report as well. Ms. McCormick asked if EPA conducted any Activity Based Sampling during the winter months as scientists tell her the winter time is the driest in that area. Ms. Matzko replied that Activity Based Sampling was conducted only in the summer months but that ambient air monitoring conducted in the community was year round.

³⁵₁₇ Ms. McCormick asked if there was any concern about some of the samples found at the park described in Ms. Matzko's presentation, noting she is concerned that 6 high test results were indicated and it has already been covered with soil. Ms. Matzko responded that this testing was done prior to removal activities and that Activity Based Sampling was done at the very top of the pile, where no covering had been done.

³⁵₁₇ Mr. Eric Cheung asked if the fencing that will be removed during the removal process will allow access to the same area where high sampling results were found. Ms. Matzko reiterated that the samples she had taken and were discussing in her presentation were taken before removal activities had been conducted. Mr. Cheung then asked if more Activity Based Sampling should be conducted now that removal activities are being conducted. Ms. Matzko explained that there were no plans to conduct further Activity Based Sampling.

³⁵₁₇ Mr. Peter Lowry added that he thinks EPA is operating under the assumption that the removal activities were not disturbing enough to warrant further Activity Based Sampling. Mr. Lowry inquired if the Site was the same today as when it was originally tested. Ms. Matzko replied that it was not. Mr. Lowry again noted that this would indicate that EPA is assuming that removal activities could have only positive results and they may want to request more sampling post-removal. Ms. Matzko gave more clarification of the Activity Based Sampling process, noting that it is EPA's decision tool for risk as it mimics what might happen in certain real life situations.

³⁵₁₇ Mr. Sal Boccuti referred to a portion of Ms. Matzko presentation discussing a cost estimate for full removal. Mr. Boccuti asked if they will be providing an estimate on how long a full removal would take, in addition to how much it will cost. Ms. Matzko responded that there may be a time factor in the Army Corps of Engineers estimate, but that it currently does not.

³⁵₁₇ Ms. Sharon Vargas asked if any further testing would be conducted in the park before the fence is removed. Ms. Matzko replied that there would be no further remedial testing. Ms. Vargas then asked if EPA would be coming back to check their work. Mr. Rovira noted that he would be conducting air sampling around the perimeter once the removal work is complete. Mr. Rovira noted that the sampling Ms. Matzko indicated was complete is a different set of testing.

³⁵₁₇ Ms. Sharon McCormick made the comment that the Ambler Asbestos Pile Site was a good indicator of the effectiveness of the Five Year Review process. Ms. Matzko then explained the Five Year Review process in detail to the group.

³⁵₁₇ Mr. Gordon Chase noted that he had prepared a response to EPA's decision not to conduct a pump test to determine whether there is any pathway between the 3 nearest Ambler Borough wells and the contaminated groundwater at the BoRit Site. Mr. Chase's response is as follows:

"With reference to the EPA's reasons for denial of a pump test to determine whether there is any pathway between the 3 nearest Ambler Borough wells and the contaminated groundwater at the BoRit Site, it is important to note the following:

- 1. EPA states that "the water supply well is up gradient: at a significant depth: operates occasionally; and pumps at a low rate." It is presumed that the well they refer to is #4 on Tennis Ave. However there are two further wells in Ambler, #9 and 11 that are both downstream of the BoRit Site and these appear not to have been considered in EPA's response, there being no mention of them.*

2. *The Wiswall report of June 2012 stated that "insufficient data exists to evaluate if the BoRit Site is within the radius of influence of the closest Ambler Borough supply wells under pumping conditions." I believe there has been no further data gathered by EPA since this report to change this finding and as such EPA are unable to conclude that there is no cone of influence exerted by Ambler Borough Wells on the contaminated BoRit groundwater.*
3. *The Wiswall report also noted "a downward vertical component of groundwater flow existed from the overburden into the fractured bedrock." Furthermore, Wiswall reports that the rock formations in this area reveal both upward and downward flows of water and significant horizontal flows at ratios up to 100:1.*
4. *Wiswall noted that Carbon Tetrachloride and PCE "appear to be migrating into the deeper groundwater."*
5. *Finally, the Wiswall report concludes that "Additional study would be required to determine the degree to which the bedrock well fractures are connected to the shallow groundwater or to each other." He also states that "pump testing individual bedrock wells while monitoring nearby piezometers would provide insight on the connection between the shallow groundwater and bedrock fractures..."*

Given these findings by Wiswall, which are not refuted by EPA, their refusal to conduct pump tests as suggested by Wiswall does not appear consistent with the science at hand.

Furthermore, it is understood that as the basic infrastructure required for such tests is already in place (namely the test wells and Ambler Borough wells) the commission of such pump tests would be an inexpensive and readily available option which would help determine whether there is a pathway between the BoRit Site and the Ambler Borough wells. The decision by EPA not to take advantage of this option to answer such an important and outstanding question is difficult to understand as there appears no logical or scientific reason given by EPA not to proceed as per Wiswall's conclusions. As such, I propose the RR&M committee take this matter up again prior to the next CAG meeting."

³⁵₁₇ Mr. Chase noted that he would like to know what the reasons are for not doing the requested pump testing. Ms. Matzko replied that EPA has articulated on many occasions what EPA thought were scientific reasons for not conducting this pump testing. Ms. Matzko cited several reasons why EPA has not conducted the pump testing, such as: the well is upgradient, groundwater testing has indicated groundwater is flowing in the direction of the Wissahickon Creek, and after 5 separate sampling rounds of groundwater, the data has remained consistent. Ms. Matzko noted that she has not seen any reason to conduct further pump testing. Mr. Chase noted that EPA TASC contractor Mr. Stuart Wiswall, had recommended this additional testing in his report and cannot understand why EPA would not take the recommendations of an expert that they hired. Ms. Matzko explained that the purpose of Mr. Wiswall's report was to give the CAG a further understanding of groundwater testing in general, not to give the EPA a device to

perform further groundwater testing. Mr. Chase inquired why EPA would not perform this test, a test he feels is a simple one. Ms. Matzko replied that there is a difference of opinion on this matter.

³⁵₁₇ Ms. Sharon Vargas asked if Ms. Matzko could take the request for further pump testing back to “the powers that be” at EPA and mention that the CAG is requesting additional pump testing. Ms. Matzko responded that if the CAG wanted to submit a formal request to EPA regarding additional pump testing, they can. Mr. Chase asked if the test cost nothing, would EPA still be unwilling to conduct the test. Ms. Matzko replied that EPA’s decision is not framed in terms of money and that there are many other factors involved with a pump testing. Mr. Joe McDowell of EPA noted that though EPA has fulfilled many of the CAG’s requests on many issues in the past, they must agree to disagree on this issue. EPA feels as if there are more important issues to focus on.

³⁵₁₇ Ms. Diane Morgan stated that if EPA went to the trouble of hiring an expert, she would think that EPA would follow that expert’s suggestions. She noted that she finds it shocking that EPA is not acting upon this suggestion. Ms. Matzko reiterated that Mr. Wiswall’s purpose was not to give recommendations to EPA, but instead to give further clarification of groundwater testing to the CAG.

At this point, Co-Chair Bob Adams stopped the discussion due to time constraint noting that the conversation would be continued at the next RR&M meeting.

Item #4: Next Steps & Old/New Business

³⁵₁₇ Co-Chair Bob Adams noted that the CAG is currently looking for someone to update the Action Items List now that Susan Curry is no longer available to do this task. Mr. Adams did note that the Action Items list is diminishing as lots of issues on the list were addressed at the previous RR&M meeting.

³⁵₁₇ Mr. Adams noted that Ms. Lynn Hoffman has resigned from the CAG which leaves the CAG without a representative from the Mercer Hill community. Mr. Sal Boccuti asked if Ms. Hoffman had an alternate. Mr. Adams responded that she did not.

³⁵₁₇ Ms. Lora Werner of ATSDR indicated that a focus group she was hoping to conduct in February would instead have to be rescheduled, possibly in the month of April.

³⁵₁₇ Mr. Sal Boccuti asked the group if everyone had signed the Sign-In sheet. The group responded that they had.

³⁵₁₇ Ms. Sharon McCormick stated that she feels the group should begin discussions on yearly Ambient Air Testing.

³⁵₁₇ Mr. Eric Cheung asked about the CAG current internet site domain as it had recently been inaccessible. Mr. Chase responded that the dues for the domain had been paid and that the site

is currently back up and almost completely updated. Co-chair Bob Adams asked how much the cost of renewing the site was and Mr. Chase responded that it was \$35 and that sufficient members had contributed to cover the cost for the site.

Meeting adjourned by Co-chair Bob Adams at 8:35 p.m.

The next CAG meeting is scheduled for April 3, 2013.