



Mr. Fred Conner
420 Mallard Circle
Blue Bell, PA 19422

June 15, 2009

RE: CBA comments regarding a dirt cap on the Whitpain Park Parcel of the BoRit

Dear Mr. Conner,

CBA is against capping the BoRit Superfund site as a permanent containment remedy because it is not an effective or long term containment remedy. It does not fulfill all the nine criteria EPA uses to weigh the effectiveness of a remedy. A dirt cap is the least effective remedy for this site because it will fail. Below is a comparison of capping weighed against the nine criteria....

Nine criteria EPA must use in choosing a remedy in rough order of importance.

- Overall protection of human health and environment
- Compliance with other laws
- Long term effectiveness and permanence
- Reduction of toxicity, mobility, and or volume through treatment
- Short-term effectiveness
- Implementability
- Cost
- State acceptance
- Community acceptance

Capping the BoRit does not meet

1. Overall protection of human health and environment... cap has a predicted longevity and is subject to the elements, especially the Wissahickon Creek. A cap will fail in the long term, Ambler asbestos Superfund site prime example of this.
2. Long term effectiveness... a cap will repeatedly fail, require maintenance and incur costs forever.
3. Capping does not reduce toxicity, mobility or volume
4. State acceptance... I am sure that the state would prefer removal, treatment or destruction if given the option; the citizens living here prefer removal.
5. Community acceptance. ..Thousands of signatures to date in favor of removing the waste

Capping BoRit does meet

1. Compliance with laws
2. Short term effectiveness
3. Implementability.
- 4 Cost... it's the cheapest

Removal, treatment, destruction and/or recycling do a much better job of meeting all of the nine criteria. We would like to know why these other remedies are not being considered.

CBA believes that EPA is going to place a dirt cap on the BoRit as evident by Fred Conner's e-mail dated June 6, 2009, that truck loads of dirt are coming. We are upset that EPA has not been forthcoming about the implementation of a dirt cap remedy under the removal action. We are concerned that EPA is not considering the desires of the community, and not considering other remedies that will aid the community in eventually reclaiming the polluted grounds.

Sincerely,

Sharon McCormick
CBA founding member and advocate to the BoRit CAG
130 Tennis Avenue
Ambler ,PA 19002