

To: BoRit Asbestos Area Community Advisory Group
From: Melinda Holland, CAG Facilitator
Date: November 6, 2007
Subject: **Summary of the October 3, 2007, BoRit Asbestos Area
Community Advisory Group Meeting**

Next Meeting

The next BoRit Asbestos Area Community Advisory Group meeting will be held as follows:

Date: **Wednesday, November 28, 2007**
Time: 6:30 - 9:30 p.m.
Location: To Be Announced

If you have questions or comments regarding the upcoming meeting or about this summary, please contact Melinda Holland at melindaholland@alltel.net or 828-894-5963.

CAG Attendees

Attending were: Anne Misak, Clean Water Action; Florine Wise, West Ambler Civic Association; Fred Conner, Whitpain Residents Assoc & Whitpain Planning Comm.; Joanne Walker, Esq., Whitemarsh Twp. Residents Assoc.; Lynn Hoffmann, Mercer Hill Villiage Assoc.; Michelle Naps, M.D.; Sharon McCormick, Citizens for a Better Ambler; Beth Pilling, Montgomery Co. Planning Commission; Bud Wahl, Mayor of Ambler; Susan Curry, Ambler Environmental Advisory Committee; Roman Pronczak, Whitpain Twp. Deputy Twp. Manager; Sal Boccuti, S.Boccuti Photography; Mary Maxion (Alternate for Diane Morgan); Dave Caddick, Caddick Construction Inc..

CAG Members not attending (nor represented by an alternate) were: Paul A. Leonard, Bob Adams, Ron Curtis Jr., and Eddie Curtis.

Agency Attendees

Amelia Libertz, Vance Evans, Francisco Cruz, Larry Johnson, Eduardo Rovira, Jack Kelly, Megan Dougherty, EPA Region III; Lynda Rebarchak, PADEP Community Relations Coordinator; and Lora Werner, ATSDR.

Observers

Joe Carlucci, for Representative Rick Taylor; Mia Fioravanti (alternate for Dominic Folino, for Rep. Mike Gerber), Julie Slavet, for US Rep. Allyson Schwartz; Harriet Morton, Montgomery County Department of Health; Eydie Marincola; Greg Marincola; Carol DiPietro; Debbie Sotak, and Dan McCormick.

Meeting Highlights

- Introductions;
- Discussion and Adoption of the CAG Mission and Operating Procedures;
- BoRit Asbestos Site Overview Presentation and Discussion;
- Next Steps.

Melinda Holland opened the meeting by reviewing the agenda, groundrules and asking CAG members and observers to introduce themselves. She also reviewed the documents which were distributed at this meeting¹.

CAG Mission and Operating Procedures

At the organizing meeting of the CAG, held on September 10th, CAG members referred the Draft CAG Mission and Operating Procedures to a work group for revisions. The CAG procedures work group met by conference call on September 27th and proposed several revisions to the draft procedures document. At this meeting, Melinda Holland reviewed the changes to the procedures document proposed by the work group and by member Susan Curry. After some discussion and a couple of additional edits, the CAG members present at the meeting on October 3rd adopted, by consensus, the revised Mission and Operating Procedures.

BoRit Asbestos Site Overview

EPA Region 3 On-Scene Coordinators' (OSC) Jack Kelly and Eduardo Rovira presented an overview of the history of the BoRit Asbestos site and sampling activities. During and after the presentation CAG members had numerous questions and comments which are summarized briefly below.

In response to a question about where the samples listed in the presentation charts were collected, an EPA representative stated that they are found in the ATSDR Record of Activity Health Consultation (known as the AROA) which can be viewed at: <http://www.epaosc.net/sites/2475/files/aroa.pdf> . This document also contains historical information on the BoRit Asbestos Site, sampling, and agency public health evaluations.

A CAG member asked about the definition of chrysotile asbestos. In response an EPA representative stated that it is one of six types of asbestos, is the type used in piping and other industrial asbestos applications, and is the type found in the Ambler area. In response to another question, EPA representatives explained that the AROA report was based on the EPA Remedial Investigation and Feasibility Study (RIFS) prepared for the Ambler Asbestos Piles National Priorities List (NPL) Site. The RIFS also incorporated prior sampling data but did not provide much

¹ The documents provided at this meeting are listed at the end of the summary. Electronic PDF copies may be obtained by sending an email to the Facilitator, Melinda Holland, at melindaholland@alltel.net

information on the location of samples. A CAG member mentioned that the "Cape Report" is available in the Whitpain Township records.

In response to a question about the four overloaded samples which were collected as part of EPA's Site Assessment in April of 2006, EPA representatives explained that these samples had too much particulate materials on the filters to allow for the normal 'direct method' of analyzing the samples. Thus the 'indirect method' was used wherein the sample is broken up and can lead to overly high readings. EPA decided that the results from these samples were not conclusive and were not valid. These samples prompted EPA to conduct a more in-depth sampling under the Removal Program authority. A CAG member challenged the EPA conclusion that the 4 samples collected by the Site Assessment Program were not valid.

In response to questions about what are the standard counting methods for analysis of asbestos samples, EPA representatives explained that for health risk analysis purposes, only one type of asbestos counting method is used, but they collect data on all types of fibers in case new health standards are established in the future for other types of fibers. They noted that there is consensus among health agencies that Phase Contrast Microscopy Equivalent (PCME) is the method of choice for health analysis of air samples. In response to a CAG member's question, EPA representatives explained that the newer method, Transmission Electron Microscopy (TEM), is used to analyze asbestos samples but the fibers in the samples are counted using the older PCM counting method. This is because all of the historic data used to determine human exposure and disease was based on the PCM counting method. Several CAG members had questions about the difference between PCME and TEM, and how/why TEM data is translated into PCME. A CAG member also questioned the validity of using PCME over TEM given the high markers found in the TEM data. The EPA representatives stated that they are not experts in the analysis techniques and offered to arrange for the appropriate experts to attend the next CAG meeting.

In response to a CAG member question about when the EPA "activity based" sampling occurred, an EPA representative explained that these samples were collected in September, October, and November 2006. Another CAG member asked if EPA always used the same eight sample locations and how sample locations were selected. An EPA representative explained that the locations were set in a random grid and that the locations were usually the same, but they considered the changes in wind direction in deciding where to sample on a particular date. In response to another question, an EPA representative explained that they did not collect soil samples from the asbestos piles, but did collect some soil samples in the former Whitpain Park area. An EPA representative explained that the definition of "detection limit" is based on the ability of the instrument/test method to accurately identify the substance. He further noted that an "action level" is a level beyond which an action may be taken if warranted by all the circumstances. However, there is no action level for asbestos, decisions on actions needed are based on risk analysis of the data.

A CAG member questioned whether it is safe for a recreational facility to be constructed on the former Whitpain Park area. An EPA representative stated that they do not have an answer to that question at this point, but that the agency would assist in determining if a proposed action/use could be done in a way that is protective of health. Another CAG noted that there is concern whether any of the BoRit site could be developed safely. An EPA representative stated that it might be possible to safely develop part of the site if a lot of protective measures were taken during the development.

A CAG member noted that the cancer data in the presentation must be in error as there has been a lot of asbestos related cancer and disease in the Ambler area. A PADEP representative stated that the analysis in question was based on the reported data for the Ambler zip code only, which is not a perfect database. An ATSDR representative stated that asbestosis is not a "reportable disease". The CAG member also observed that mesothelioma is often not listed as the cause of death on death certificates. She also expressed concern over the huge variability of data showed in the presentation. An EPA representative agreed that there is a wide variability in the data noting that they are not sure what it means, and that they do not have the supporting information for the older sampling data.

A CAG member asked what are the Occupational Health and Safety Agency's (OSHA) regulatory limits for asbestos fibers. An EPA representative stated that the standard is 0.1 fibers per cubic/centimeter over a eight hour day in the work place.

In response to a CAG member's question about who will make which decisions regarding the site and timing, an EPA representative noted that once the final sample analysis results are complete, the EPA Removal Program will make a recommendation which will be reviewed by the health agencies and EPA management. The EPA representative stated that they hope to announce a decision in November and have a public meeting in mid-November if they can obtain all the lab results in time. He further noted that the agency will announce their decision (with publication in the local paper) two weeks prior to the date set for the public meeting. After the decision is announced EPA must first give the site owners the opportunity to perform the recommended actions (if any are recommended). In response to another question, he noted that if the owners fail to take action that EPA does have the authority to enforce its recommendations. EPA also has the authority to conduct the remedial activities and seek cost recovery from potentially responsible parties at a future date.

Next, several CAG members expressed concern about EPA proposing a decision for the BoRit site without giving the CAG time to evaluate the information and provide the agency with feedback. CAG members also stated that they believe that data from past studies and from soil and core analysis should be considered in the decision. An EPA representative asked CAG members to provide the agency with any data or studies which the members believe the agency has not considered.

CAG members expressed frustration at forming the CAG so near to the time that the agency plans to make a decision. CAG members suggested that EPA delay

making its recommendation to allow the CAG to make its recommendations or find a way to bring in a private consultant to do additional study. Another CAG member reminded the group of the CAG's own goals (in the mission statement) which go beyond just providing EPA with feedback, and include the future use of the site. A CAG member noted that even though most of the CAG seems to feel that EPA is the only entity with the ability to do remedial action at the site, a near-term EPA decision does not mean that the CAG should stop its activities.

A CAG member suggested holding a special meeting as soon as possible with EPA technical experts to ask questions regarding the data and other technical issues. CAG members who expressed interest in participating in this meeting (if held) were: Susan Curry, Michelle Naps, Sharon McCormick, Mary Maxion (Diane Morgan's alternate), Lynn Hoffman, Eileen Fournier, Lora Werner, Sal Boccuti, and Bud Wahl. Melinda Holland agreed to follow up with CAG members regarding future meeting dates and topics.

CAG Information Needs and Technical Questions

During the meeting, CAG members were asked to write down their technical questions and information needs and turn them in at the end of the meeting. The following is the compilation of the information needs and technical questions submitted by CAG members at the end of the October 3rd meeting (Melinda Holland reorganized the questions under topic headings for ease of use.):

RISK

- How is "acceptable risk" determined. Who sets the standard? What goes into the site risk assessment process? How often is it reviewed/updated? What evidence triggers revision?
- Education is needed on just what the threat/risk from asbestos is and how many non-worker cases of asbestos-related illness; have been reported in the Ambler area. Perhaps ATSDR has this information;
- Want to know more about an ATSDR document which indicates that uncovered asbestos is a risk to human health;
- Can asbestos fibers in water be deposited on downstream banks during high water then become dried and eventually airborne? How do you calculate the risk of such a possibility?

DATA & INTERPRETATION OF DATA

- Literally how is the data/material done in PCME? Is a section of the filter used to create/interpret in PCME?
- Please explain why the TEM and PCME is not comparable but is initially reported in the TEM format?
- Please explain TEM and PCME. Are the following statements correct?
 - All samples are taken and initially reported in TEM?
 - Then TEM is sub-categorized - ex. Air, soil, water, etc.?
 - From the sub-sample [sub-categorization] the data is processed into PCME data?

- If the 2006 - 2007 sampling data were interpreted by other methods, what would we see?
 - Total TEM EPA Superfund Method?
 - AHERA?
 - Berman Crump 2003?
- Resolve the question of the accuracy/quality of data and comparisons; 'apples to apples'. Explain different methods - PCME vs. newer TEM;
- Will EPA consider delaying a determination taking into account the special situation of substantial variability with 2006 data?
- Need to compare TEM tests of the past and TEM tests of the present to see whether the risks of the past are the same today;
- Need more expert help to understand interpreting the lab results; EPA's suggestion to bring a lab person in is a good one;
- How many samples are acceptable for the BoRit site - 300 or 3,000?

OTHER QUESTIONS/INFORMATION NEEDS

- Need information on the EPA decision making process (and also the PADEP process). It seems that people don't really understand the process.
- What resources are available to a CAG in ensuring that a contaminated site is remediated for safety and averts a future of continued toxic waste site blight upon the community (regardless of current air sample readings)?;
- Is Area 3 (Whitpain Park) safe at this time for the children and the community? With EPA and DEP help is it possible for a Boys and Girls Club using 3 or 4 acres of the land in West Ambler/Whitpain Township?;
- Is there contamination where the swings and gazebo were located (in the park area)? From where the fence is, how much of the land might not be contaminated?;
- How long will West Ambler community be without quality of life, no park, no play area. Children need to be protected and safe?;
- What action/document directed the remedial program to "take over" the site from the Site Assessment Program? Who took the action/made the decision? Why was the action taken? When?;
- Are there DEP documents that show where building into asbestos has been done in the last few years?;
- If asbestos waste is covered with soil, can it work its way to the surface?;
- Is there a minimum amount of soil cover that is recommended?;
- Would like technical advice as to what can be safely done at the site and how it can be done;
- Can the CAG get a technical assistance grant (TAG)?;
- What is meant by "institutional controls"?;
- What are Kane Core Inc.'s current plans, hopes, intentions, or actions for their 6 acres?

Observer Comments

There were no observer comments.

October 3rd CAG Meeting Action Items

Action	Assigned To	Due Date
Follow up with CAG members and EPA regarding the dates and topics of future CAG meetings	M. Holland	10/22/07

Documents Distributed

Document Subject	Document Description	Date; Generated by (if known)
10/03/07 Meeting Agenda	Agenda	10/01/07; Holland
EPA Presentation	Presentation	10/03/07; E. Rovira & J. Kelly
Revised Draft CAG Mission and Operating Procedures	Procedures	10/02/07; Holland
S. Curry's proposed edits to the Revised Draft CAG Mission and Operating Procedures	Procedures	10/02/07; S. Curry
PADEP Permit Information Sheet	Fact Sheet	PADEP
Summary of the 09/10/07 BoRit CAG Meeting	Summary	09/14/07; Holland

