

Groundwater Monitoring Data Review  
BoRit Asbestos Site  
Ambler, Montgomery County, Pennsylvania

Prepared by  
Pennsylvania Department of Health

PUBLIC COMMENT

Dear Sir/Madam,

I refer to the above entitled report of August 3<sup>rd</sup> 2012 and would like to make the following comments for the record and for consideration by both the Pennsylvania Department of Health (PADOH) and the Agency for Toxic Substances and Disease Registry (ATSDR) prior to their issuance of a final report.

- I would like to commend both agencies for the time and effort expended on behalf of the residents surrounding the BoRit site in compiling their review of the groundwater monitoring data. Their recommendations, based on the data available to them at the time of writing, are an important step in ensuring that the pollution present at the BoRit site is fully documented, evaluated and subsequently addressed by the lead agency at BoRit, namely the US Environmental Protection Agency (EPA).
- During the same period that PADOH and ATSDR were preparing their report, an additional independent review of EPA's Phase 11 Ground Water Report, commissioned by the BoRit Community Advisory Group (CAG) and funded by the EPA, was being undertaken by Stuart Wiswall (of Keating Environmental Management Inc.) on behalf of Skeo Solutions, the consultancy retained by EPA for such purposes. This report (referred to hereafter as the Wiswall report) is officially known as the "TASC (Technical Assistance Services for Communities) Summary and Review of the Preliminary Phase II Groundwater Report for the BoRit Asbestos Superfund Site " and can be viewed at the BoRit web site: <http://www.boritag.org/pdf/TASC%20Review%20of%20Preliminary%20Phase%20II%20Groundwater%20Report%20for%20BoRit%20Draft%206-28-12.pdf>.
- As a result of coincidental timing, the Wiswall report does not feature in the PADOH report and none of the Wiswall findings regarding data, lack thereof and subsequent risk evaluation limitations, are included in the PADOH report and therefore not taken into consideration or referenced therein.
- The Wiswall report concentrated in part on the hydro-geological features pertaining to the BoRit site and surrounding area and in particular the evaluation of risk of contaminants found by EPA in the BoRit groundwater migrating to the nearby public drinking water sources owned and operated by Ambler Borough.
- Though the Wiswall report, at the request of EPA, did not provide recommendations for additional field testing, it did conclude that: "*There is insufficient data to determine if the BoRit Site is within the radius of influence of the closest Ambler Borough Water Department supply wells under pumping conditions, or to develop an understanding of the bedrock fracture system in the vicinity of the Site. Additional study would be required to evaluate if withdrawals from Ambler supply wells affect groundwater levels at the Site and to better understand the distribution and connectivity of the bedrock fracture system.*"
- It is my opinion that the final version of the PADOH report should take due consideration of and refer to the findings in the Wiswall report, which clearly demonstrate the need for further field testing in order to properly assess the risk of any future contamination of Ambler Borough public drinking water wells.
- It is also my opinion that the many years of data gaps in the Ambler Borough testing/reporting for contaminants of concern found at BoRit be more fully acknowledged, since much of the PADOH report is based on 'available data' but little or no mention is made where relevant data does not exist for extended periods of time.

Sincerely,

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September 25<sup>th</sup> 2012