

March 31, 2010

Ms. Stacie Pratt, Remedial Project Manager
EPA Region 3 - 3HS21
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Re: Air Monitoring
BoRit Asbestos Superfund Site

Dear Ms. Pratt

The Removal/Remediation and Monitoring (R/R&M) Work Group met on March 18, 2010 to discuss the BoRit Asbestos Superfund Site (Site). Based on these and other discussions during the regular Community Advisory Group meeting, the group is of the strong opinion that increased perimeter air monitoring at the Site is paramount for the protection of the health in the community. This monitoring should include the residential communities of West Ambler and Mercer Hill.

Background – The U.S. Environmental Protection Agency (USEPA) performed perimeter air monitoring of the Site in 2006 and 2007. The results of this historic air monitoring indicated that there were three non-activity-based detections of asbestos, but no continual wide-spread discharge of airborne asbestos from the Site. However, extensive changes to site conditions through vegetation removal, bank modifications to the Wissahickon and Rose Valley Creeks during stabilization, gravel road placement and other Site-disturbing earthwork performed as part of USEPA's Removal Action have significantly altered and changed the characteristics of the Site in the past 2 years. Therefore, the historic perimeter air monitoring results that the USEPA has been referencing as the rationale for performing air monitoring only during intrusive work activities are not valid - the site conditions that existed during the historic air sampling no longer exist and use of these background results for current conditions is not valid and scientifically flawed.

These Site modifications, as well as acts of nature (e.g., stream flooding/erosion), have resulted in documented exposure of asbestos at the Site to the atmosphere. This fact again validates the point that the Site characteristics have changed and the historic perimeter air sampling results are no longer valid as a baseline for this Site.

R/R&M Request - The R/R&M Work Group strongly urges the USEPA perform increased perimeter air monitoring on a routine basis (e.g., 24-hour daily samples for a 30-day period, every other day for the rest of the year) to better evaluate the potential health threat posed by airborne asbestos from the current configuration of the Site. The group is adamant about increased air monitoring being necessary to ensure the protection of public health from the Site (one of USEPA's primary missions) and to document to a skeptical community the actual risk of airborne asbestos particles during all weather conditions (e.g., windy conditions at night/non-working hours). In addition, we strongly request that offsite soil sampling in the community be performed during the next phase of the investigation.

Sincerely,



Eric C. Lindhult, P.E.
R/R&M Work Group Chair