

**EPA Response to
Summary of TASC Comments
BoRit Asbestos Superfund Site
Feasibility Study Review**

TASC comments provided in black and EPA responses are provided in red below:

Acceptable Cancer Risk

- The CAG may want to consider asking EPA if the preliminary remedial action objective (PRAO) can be set at a lower cancer risk level. An excess cancer risk of one in 10,000 is the highest cancer risk objective that EPA typically accepts without requiring remediation. EPA sometimes sets a site-specific cancer risk objective as low as an excess cancer risk of 1×10^{-6} (one in a million).

At BoRit, we selected $1E-04$ as a trigger for the Removal Action, which is typical. For the Remedial Program, the $1E-06$ to $1E-04$ excess cancer risk range is a discretionary area; EPA can take action (or not) in that range, and also establish clean-up goals within that range. The cleanup goals established for BoRit are risk-based values that fall within EPA's acceptable risk range. The selected concentrations are protective of human health and the environment.

Surface Water Contamination

- The CAG may want to ask EPA if the protective measure for ecological receptors also adequately protects people swimming and fishing in surface waters.

The Human Health Risk Assessment only identified asbestos from sediment as a contaminant of concern for humans. Currently, both swimming and fishing are prohibited in the Reservoir by the property owner (Wissahickon Waterfowl Preserve).

- The CAG may want to ask EPA for advice in taking further action to prevent exposure to surface waters affected by off-site contaminants that are not being addressed by the BoRit Asbestos Superfund Site cleanup. Is signage needed to alert swimmers and fishers of potential risks from contaminants in surface waters and sediments, even though the contaminants are not site-related? Is this an issue that should be brought to the attention of the state or local authorities?

EPA does not take actions (including signage) in areas that are not part of the Superfund Site or where contamination is not from on-site activities. Portions of the Wissahickon Creek, Rose Valley Creek and Tannery Run stream banks were stabilized as part of the EPA Removal Program work at the Site in order to prevent and minimize future contamination of creek surface water and sediment. Both the Pennsylvania Department of Environmental Protection (PADEP) and the U.S. Fish and Wildlife Service have been involved in the remedial process for the BoRit Asbestos Superfund Site.

Remedy

- As pointed out by the asbestos remediation professionals, we believe WSS2 – Capping is the most appropriate remedy for this site. The following suggestions are not intended to undermine the appropriateness of capping, but they do emphasize the importance of comprehensive, robust and strictly-enforced engineered and institutional controls, which are yet to be set.
 - The CAG may want to ask EPA for assurance that the geotextiles used beneath the cap are of sufficient strength to discourage burrowing animals.

The geotextiles used under the soil cap were used to stabilize the terrain to provide an acceptable surface to place the cover material, provide erosion control or aid in drainage and to serve as a line of demarcation to identify where the asbestos containing material begins.

- The CAG may want to ask EPA for more information about the design of the slope and EPA's confidence in the slope stability in the asbestos pile parcel.

EPA's preferred slope or gradient for a cover on a sloped surface is a horizontal distance of 3 for every vertical distance of 1. This is common engineering practice in the United States.

- The CAG may want to ask EPA to consider whether additional activity-based sampling (ABS) under lower soil moisture conditions may be warranted for any asbestos-containing areas left uncovered on site or off site, even if the amount of asbestos in soil is less than 1 percent.

The Remedial Investigation sampling for asbestos was conducted using the *Framework for Investigation Asbestos-Contaminated Superfund Sites*, OSWER Directive #9200.0-68, dated September 2008. The document presents a recommended framework for investigating and characterizing the potential for human exposure from asbestos contamination at Superfund Sites. The remedies presented in the Feasibility Study, with the exception of the No Action alternative, do not leave any asbestos-containing areas uncovered or untreated on Site.