Summer 2010 Activities at the BoRit Superfund Site
August 2, 2010 Update

EPA is doing considerable work at the BoRit Superfund Site this summer. The following information is being provided to clarify issues that have been raised to EPA. Regular updates about our progress are being developed and will also be available online at www.epa.gov/reg3hwmd/npl/PAD981034887. For additional information, please contact Vance Evans, EPA Community Involvement Coordinator, at (215) 814-5526 or at evans.vance@epa.gov

Air Sampling in the Community

EPA did conduct air monitoring in the community for 13 months from October 2006 to September 2007 and determined that asbestos levels did not pose a risk to the community. Currently, site conditions are greatly improved and provide greater protection to the public, primarily due to the work EPA has done to stabilize the site.

Additionally, EPA is in the process of summarizing and reviewing the stationary air monitoring data that has been collected at the BoRit Superfund Site and within the nearby community since 2006. EPA will evaluate this data to determine if stationary air monitoring is necessary and will share this information with the community at the conclusion of its review later this year. It is likely, however, based on community concerns that we will be doing some additional air monitoring in the community later this summer/early fall and we'll continue to keep the Community Advisory Group (CAG) for the BoRit Site, and the community at large, informed of our plans.

EPA's Cleanup Work at the Site

Purpose of the Stream Bank Stabilization Work being done: The purpose of EPA's work during the past two years along the stream banks of the Wissahickon and Rose Valley creeks has been to deal with short-term risks by stabilizing them to prevent any erosion and minimize any asbestos fibers from leaving the site. The main health threat from asbestos at this site is inhalation, which is why groundwater is not part of this work.

Related to funding, the EPA was asked during the June CAG meeting if it was physically possible to level the pile behind the McDonald's restaurant. While it is physically possible, our current scope and funding is only authorized for stabilizing the stream banks, not leveling the pile behind the restaurant.

Funding for the Cleanup Work: To date, EPA has authorized funds to address the immediate or short term threats at the BoRit Site in the amount of $9,612,380, of which approximately $7,000,000 has been spent to perform the following actions:

- Stabilizing the Wissahickon Creek bank adjacent to the former park,
- Stabilizing both banks of Rose Valley Creek,
- Covering the exposed waste along the outside slope of the reservoir berm,

and

- Constructing access roads and preparing areas which are necessary to work on locations that are to be stabilized and/or covered.

The remainder of the money will be used to stabilize both banks of Tannery Run and the Wissahickon Creek bank adjacent to the asbestos pile property.

EPA Begins Long-term Cleanup Activities

Additional response costs have been expended and are expected to be incurred in the future to address the Site's long-term threats. Currently, the Remedial Investigation/Feasibility Study process is underway to investigate the nature and extent of contamination and evaluate possible remedial alternatives. The ultimate remedy (and cost) has not been determined.

Protective Measures During Our Site Work

EPA is taking every precaution to protect our workers and the general public and we will continue our wetting procedures in the area to minimize and prevent detections.

We are particularly aware of the concerns and questions the current work has created about potential asbestos air emissions. First and foremost, the safety of our workers is of utmost importance. They wear masks and other personal protective equipment (PPE) whenever they are in contact with asbestos-containing material (ACM). If residents see them without PPE it is because they are working in areas that do not have elevated levels of asbestos fibers or ACM.

EPA is equally concerned with the safety of the general public. The wetting procedures being used at the site to control dust levels prevents potential asbestos fibers from leaving the site and are protective of human health and in keeping with national standards for asbestos cleanup work by EPA. Therefore, though some residents have asked us to consider another methodology for dust suppression we will continue to follow the accepted method.

The common practice is to keep everything saturated, and that is what EPA did during the clearing and grubbing activities at the pile property. Due to citizen concerns that asbestos air emissions could be a problem, EPA placed a total of four sprinklers on the pile to help keep the area saturated, in addition to the contractors with the hoses and the water truck.

The other common practice is to conduct air sampling for asbestos. EPA conducted air sampling while all the clearing and grubbing activities took place. The results showed five detections out of the 48 total samples collected, with one detection just outside the site boundary, one detection on-site, and the other three from personal monitors. The toxicologists have evaluated these results and concluded that the levels found should not pose an unacceptable or significant health risk to the residents in the vicinity of the site.

Additionally, based on review of past air sampling data:

1. The work is being done properly and safely.

2. The EPA toxicologist concluded that exposure to workers during the clearing and grubbing activities was within an expected range and worker safety was addressed with the use of personal protective equipment and wetting procedures.

Purpose of Clearing Operations

EPA realizes that the size of the area that was cleared between June 23 and July 2, 2010 at the pile is relatively large -- approximately 55,000 square feet (1.26 acres) and created concern about possible asbestos exposure for some residents in the area. The area needed to be cleared in order for EPA to construct access roads and staging areas for the upcoming stream bank restoration work at Tannery Run and Wissahickon Creek. Additionally, a portion of the asbestos pile will be relocated **within the pile property** to allow for safe access to some cleanup areas. Therefore, it was necessary for EPA to clear a safe area to house the relocated pile on site.

EPA's NESHAP regulations for asbestos, at 40 C.F.R. Part 61, Subpart M, require wetting for certain "demolition" and "renovation" activities, which are defined at 40 C.F.R. Part 61.141. In general, these requirements require wetting during operations, such as cutting, disjoining, and stripping of ACM, and adequate wetting of ACM that has been taken out or stripped. EPA's removal program is required to comply with these regulations, to the extent practicable under the exigency of the circumstances.

With the exception of Sunday, June 27, 2010, EPA and its contractor worked approximately 10 hours each day on the clearing and grubbing activities. During these activities, EPA's practice was to keep everything saturated. Four sprinklers were set up at the pile property to help keep the area saturated. In addition, EPA's contractors used hoses and a water truck to wet areas.

Once the area was cleared on the pile property, EPA's contractor began to move clean soils from the park property to cover the cleared area. The soils could not be stockpiled on the pile property before the clearing and grubbing activities took place because of the lack of room.

EPA also conducted air sampling for asbestos during all the clearing and grubbing activities. The results showed five detections out of the 48 total samples collected, with one sample just outside the site boundary, one sample on-site, and the other three from personal monitors.

The single off-site sample showed a concentration of asbestos in excess of the Preliminary Remediation Goal (PRG) for long-term (30 years) residential exposure. PRGs are screening levels for evaluating analytical data, and are generally the starting point for estimating risk-based clean-up goals. Despite this finding, an unacceptable risk is not reasonably expected to occur, since the actual exposure duration during intrusive activities at the pile was relatively brief and the off-site detection was isolated to a

solitary location. EPA will continue wetting the area to minimize/prevent the release of ACM and will continue to conduct air sampling for asbestos.

EPA is aware that a portion of the pile property was cleared of vegetation and left uncovered when work at the Site adjourned, from Saturday evening (6/26/10) until Monday morning (6/28/10), when work resumed. As mentioned above, sampling was conducted each day during the clearing and grubbing operations. The likelihood of asbestos fibers becoming airborne is much higher during intrusive activities than when no activities are taking place on the area. Therefore, based on the air monitoring results during the active clearing and grubbing operations (evaluated by the EPA toxicologist), no unacceptable or significant health risk to the residents in the vicinity of the Site was expected from the single day during which no earthmoving activities occurred.

Again, because EPA used the same safety measures for clearing and grubbing as we have in the past, we do not expect to see elevated levels of asbestos impacting the nearby residents.

Past Asbestos Contamination in Ambler

Some residents have stated that the EPA and the Pennsylvania Department of the Environment (PADEP) have allowed asbestos releases and the illegal stockpiling of asbestos waste in Ambler. This is untrue. Rather, the EPA and PADEP have been consistently involved in the evaluation and cleanup of asbestos hazards in Ambler.

At the time when most of the waste disposal occurred in Ambler, there were no laws prohibiting such disposal activities, and the EPA was not in existence to handle such problems. The Pennsylvania Department of Environmental Resources (PADER, which is currently the Department of Environmental Protection or PADEP) and EPA became actively involved with the Ambler Asbestos Site in 1971 after receiving a complaint from the Wissahickon Valley Watershed Association concerning the possible contamination of air and water from the operations of the Nicolet and CertainTeed companies in Ambler. These two companies owned and operated the three waste piles that make up the Ambler Asbestos Superfund Site. Investigations showed visible emissions and substantial dust concentrations at the Site and the owners were ordered to stop dumping on the piles. The Superfund law was enacted in 1980, and the Ambler Asbestos Piles Site was formally evaluated by EPA's Superfund Removal Program which conducted an assessment and several response actions to stabilize the massive piles which were then commonly known as the "White Mountains" because of the visible waste on the uncovered side slopes. Subsequently, the Site was placed on the National Priorities List (NPL or Superfund List) and, after a full evaluation, the capping remedy was selected and implemented by EPA's Remedial Program.

Near the Ambler Asbestos Site, there are other areas that were also used for waste disposal by the Keasbey & Mattison Company, the original Asbestos products manufacturer in Ambler. The West Maple Street Pile (now designated the BoRit pile), the East Maple Street Pile (now designated Whitpain Park) and the reservoir between

them were not included in the original handling of the Site, because, as stated in the Remedial Investigation Report for the Ambler Asbestos Piles Site, "The Maple Avenue Piles were covered and vegetated by PADER in the mid 1970s and are currently monitored by PADER." As early as 1984, and several times thereafter, EPA evaluated the BoRit pile and Whitpain Park. Each time, EPA determined they did not warrant Superfund action. It was not until the most recent assessment by EPA's Removal Program, with a focus on the site's deteriorating conditions, and a more advanced evaluative approach to asbestos sites, that the decision was made to initiate a Removal Action and subsequent evaluation for proposal to the Superfund List. The three areas were considered together as one site and finalized on the Superfund List as the BoRit Asbestos Site.

At many sites evaluated in the 1980s, including the Ambler Asbestos Site, EPA's Superfund program did not investigate or cleanup hazardous waste inside factory buildings. In accordance with the EPA's 1983 Guidance for Controlling Friable Asbestos Containing Materials in Buildings, if a determination was made that the buildings could be secured, and the hazardous substances inside were unlikely to be released to the environment and pose a significant threat to public health, then the building would not be included in a Superfund action. As stated in the guidance, "The decision whether to take action and the selection among different courses of action are the responsibilities of individual building owners." There are instances where conditions led to the inclusion of buildings in Superfund actions, but that determination was not made at the Ambler Asbestos Site. Also, portions of the Ambler Asbestos facility were in operation until 1987, in which case OSHA would be the regulatory agency enforcing the proper handling of hazardous materials within the buildings. When the facilities became abandoned, PADEP became the primary enforcing agency. PADEP has worked with property owners and developers to restrict access to the buildings.

EPA is Working with the Community Advisory Group to Help Inform the Public

The EPA has been working closely with the CAG for the BoRit Site to keep them informed so that they may inform their constituents. EPA has also offered a variety of technical assistance opportunities to the CAG to help them interpret and understand documents and data related to EPA's work at the site. In addition to receiving several technical experts to date, the CAG has also expressed an interest in obtaining an independent asbestos expert to assist in understanding the cleanup process and comment on EPA documents. The EPA has a grant program available to accommodate this request. The grant is called a Technical Assistance Grant (TAG) and EPA has encouraged the CAG to consider applying for the TAG which is available for the remedial, or long term, activities only. In addition, EPA has offered to present information about the TAG to the community group and looks forward to the CAG's response.