

July 20, 2009

Joyce K. Frank
Acting Associate Administrator for
Congressional & Intergovernmental Relations
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Room 3426 ARN
Washington, D.C. 20460

Dear Acting Associate Administrator Frank:

We are writing due to the overwhelming concerns expressed by residents and neighbors of Ambler Borough regarding the EPA's apparent current remedial action plan for the BoRit Asbestos Superfund Site. As we understand the issue, the EPA Region 3 is planning to apply a dirt cap to the site as it had similarly done years ago to the Ambler Asbestos Superfund site. While we agree with and support the EPA in its recognition that the site is not fully contained which leads to the potential of continued asbestos exposure to residents in the Borough of Ambler and surrounding municipalities, the Borough of Ambler takes issue with what appears to be the EPA's plan to apply a dirt cap barrier as a remediation technique.

There are documented limitations to the durability of a dirt cap caused by erosion that can breach the cap; additionally, its efficiency is affected by the thoroughness of maintenance it receives and by any other safeguards or stabilization activities that may be put into place. We do not believe that capping provides a permanent containment remedy that will resolve this decades-old high health hazard.

It is the firmly held opinion of Ambler Borough Council that considerations to set forth a remedial action plan should include state-of-the-art technologically available remedies. The activities currently underway by the EPA have not advanced beyond those technical availabilities of the 1980's. Remediation options now go beyond either capping or carting. There exists today the technology of utilizing a thermochemical process that destroys asbestos, turning it into a gravel-like aggregate that can be used safely in other building and construction projects. We urge the EPA to explore this potential remedy which accomplishes more than mere reduction of the volume of asbestos because it treats and destroys the asbestos in its entirety. Once destroyed this non-toxic aggregate material can safely be removed.

We bring to your attention an internal memorandum written in 1986 by former Borough Manager Ed Heimel to Borough Council. On Heimel's memorandum, page 7, in commentary on EPA Workplan Page 3-9, he inquires as to "when do new technologies become proven [to the EPA], particularly when they may provide a superior result." Further, regarding EPA Workplan Page 3-10, Himmel states "we are more concerned with the long-term guarantee of positive results [of a remedial action plan]."

It is the hope of Ambler Borough Council that you will consider a better technological remedy for cleanup of the BoRit site. The aforementioned thermochemical process provides the optimum remedy for protection of both human health and the environment from asbestos-containing materials because it is a permanent remedy that will best enable our community to reclaim its land.

For your knowledge, as part of our community's revitalization effort we have been working with a private developer who last year received from the State of Pennsylvania an \$8,000,000 contribution towards his required \$15,000,000 cleanup cost at another asbestos waste site in Ambler which he plans to develop. With this grant from the state and with Montgomery County involvement we believe that our community will successfully clean up and make productive use of this land.

After more than 35 years of EPA involvement with asbestos waste in the Ambler community, and now that the EPA is addressing safety concerns at the BoRit site, we encourage it to reconsider its position that capping the BoRit site is the only feasible treatment. Your consideration in this regard would be greatly appreciated.

On Behalf of Ambler Borough Council,

Mary Aversa
Ambler Borough Manager