

February 27, 1998

Robert Sorrentino  
W.R. Grace & Co.  
62 Whittemore Avenue  
Cambridge, MA 02140

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PLEASE INCLUDE AS  
PART OF CITY COUNCIL  
AGENDA: Joseph Joseph

Dear Mr. Sorrentino:

The Alewife Study Group has reviewed the asbestos sampling plan prepared for the W.R. Grace Cambridge facility submitted for review by Haley and Aldrich on behalf of W.R. Grace. We also considered information presented by W.R. Grace representatives during the February 10, 1998 rezoning meeting concerning historic asbestos use at the Cambridge facility and the proposed sampling plan.

We believe that the February 1998 sampling plan is incomplete. A comprehensive community response cannot be finalized until W.R. Grace addresses the following items satisfactorily:

1. **No rationale was provided for the number and location of samples.** Without additional information, it is impossible to determine if the locations are purposeful (i.e., located in areas most likely to contain waste) or if they are random. If they are purposeful, additional information is required to determine if all suspected areas are targeted for sampling. If the proposed sample locations are random, additional information is required to evaluate the level of confidence associated with the likelihood of detecting asbestos with the number of proposed samples. Based upon the presentation of the plan during the February 10, 1998 meeting, if asbestos waste is present in subsurface soils, it is most likely present in small discrete areas. There are standard techniques to determine the number of samples (and grid spacing) to either locate potential 'hot spots' or to confidently conclude their absence (see for example Gilbert, R.O., 1987. *Statistical Methods for Environmental Pollution Monitoring*. Van Nostrand Reinhold). Since there appears to be no idea where asbestos waste would have been deposited, only a systematic plan to maximize coverage of all possible locations makes sense.
2. **The figure illustrating the proposed locations for asbestos sample collection did not include a scale.** Without an appropriate scale for the sampling location plan, meaningful interpretation of the proposed locations can not be provided. It should also be noted that it is standard industry practice to place an accurate scale on all plans.
3. **A justification of the detection limit for the proposed testing is needed.** A criteria of 1% by weight was proposed to classify asbestos containing material from non-asbestos containing material. This criteria appears to be based upon current asbestos regulations. In order to evaluate the proposed criteria for use at this site, a presentation of the proposed criteria's source and the analytical method's detection limit for the proposed testing are required. A discussion of data quality objectives is requested.
4. **A more detailed plan should be available for community review and should include risk assessment procedures and a description of exposure scenarios to be evaluated.** This more detailed and agreeable plan should be made available for community review and should include risk assessment procedures and a description of exposure scenarios to be evaluated. If asbestos is discovered, the community desires to review and provide comment on the background investigation plan before it is implemented.

It is believed that attention to and inclusion of the aforesaid items will result in a plan that is comprehensive and thus acceptable to the general public.

In addition to comments relating specifically to the Grace asbestos testing plan, the Alewife Study Group wishes to clarify misleading representations on the part of W.R. Grace in their January 13, 1998 letter to DEP Commissioner David Struhs. In that letter, it is argued that the visitations of the Division of Occupational Hygiene were part of a field training exercise. Specifically, W.R. Grace does not mention earlier correspondence from The Division of Labor and Industries regarding benzol usage. According to Dr. Elkins, benzol was a significant problem at the Dewey and Almy plant, and thus the Division continued to monitor and study its usage through the following decade. The Multibestos operation which was established in both Walpole and Cambridge was the subject of a long series of correspondence also extending through the following decade with many references to asbestos related health problems.

W.R. Grace's January 13 letter states:

"Based upon our review, we believe that some asbestos was used in 1933 and 1934, and possibly in the 1930's, in Buildings 11 and 12".

This statement and the detail that follows is quite useful and ought to be explored. Grace's assertion that "Walpole, and not Cambridge, remained the location for substantially all of the manufacture of brake linings" is quite emphatic and reflective of the sort of certainty that only documented facts can assure. Apparently, this information was missing when Grace submitted its Environmental Assessment to the DEP over ten years ago, since that assessment contained no mention of asbestos usage. We are heartened to discover that it now has been located. Respectfully therefore, we request that W.R. Grace share all material upon which this assertion is based along with any other previously unreleased information concerning hazardous waste and environmental contamination at its Cambridge site that could possibly be relevant to the Site's characterization.

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In addition to the aforementioned issues, W.R. Grace stated in its January 13<sup>th</sup> letter that "large-scale manufacturing" ceased in 1984. Have there been any chemical spills at this site since that date? If so, we request that Grace provide this information along with a definition of "large scale manufacturing" to the neighborhood for review.

Accompanying the asbestos inquiry response, were a number of marginally related 'Tabs' including one (Tab 4) that contained a letter to the city of Cambridge from Wesley Stimpson of Haley and Aldrich on behalf of W.R. Grace. We would request that a copy of this letter be forwarded to Dr. Jack Spengler so that he might review and comment upon Grace's characterization of the summation related in Tab 3 (*Public Health Risk Evaluation for W.R. Grace Site in Cambridge, Massachusetts*, EH&E 95.415).

Although the included index references Haley and Aldrich's letter (Tab 4) as dated January 12, 1997, the correct date recorded on the actual letter is January 12, 1998. Additionally, the letter (Tab 4) refers to the Whittemore **Avenue** neighborhood incorrectly as the "Whittemore **Street** neighborhood". More importantly, the letter gives the impression that Dr. Spengler made recommendations for long-term groundwater monitoring for Whittemore Street [Avenue] only. In fact, the included March 20, 1996 letter from Dr. Spengler (Tab 3) recommended that Grace's groundwater monitoring model was "not sufficiently described or documented in reports to substantiate the claims that, the simulated existing groundwater conditions reasonably reflected existing groundwater conditions" (p.6). In light of this, Dr. Spengler recommended that given sufficient description and documentation from more accurate modeling based upon "staged groundwater and possible soil tests" the question of groundwater movement below the playing field toward Clifton Street could be resolved. In April of 1996, Dr. Spengler further clarified and reconfirmed this point of view by suggesting two options the first of which was to analyze bulk water

cc: Cambridge City Council  
John DeVillars, USEPA  
Karen Stromberg, DEP Northeast Regional Office  
Patricia Donahue, DEP Northeast Regional Office  
State Senator Warren Tolman  
State Representative Alice Wolf  
State Senator Robert Havern  
U.S. Senator Edward M. Kennedy  
U.S. Senator John Kerry  
U.S. Representative Joseph P. Kennedy  
Dr. John D. Spengler, Ph.D.

Consent Communciation #20 S-163

Communication was received from  
Jospeh J. Joseph, transmitting  
a letter regarding the Alewife  
Study Group's review of the  
asbestos sampling plan prepared  
for the W.R. Grace Cambridge  
facility.

In City Council March 16, 1998

**PLACED ON FILE**