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HEALTH CARE WITHOUT HARM
THE CAMPAIGN FOR ENVIRONMENTALLY RESPONSIBLE HEALTH CARE

June 20, 2001

Fax To: Cambridge City Council

617-349-4280 fax
(this transmittal is being faxed 9 times)

From: Bill Ravanese

Health Care Without Harm

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Number of pages including cover = 3

Bill Ravanese

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CAMBRIDGE, MASSACHUSETTS

HEALTH CARE WITHOUT HARM

THE CAMPAIGN FOR ENVIRONMENTALLY RESPONSIBLE HEALTH CARE

June 19, 2001

Harold Cox
Public Health Officer
Cambridge Health Alliance
1493 Cambridge Street
Cambridge, MA 02139

Dear Mr. Cox:

We were quite pleased that the Cambridge Health Alliance was the recipient of an award from Health Care Without Harm for your participation in making Cambridge a mercury free environment. Advocacy of this sort is precisely what public health authorities ought to do and in this regard, Cambridge should be encouraged and congratulated. Your efforts along with a number of other Massachusetts cities that have taken similar action will help facilitate the passage of a state-wide mercury fever thermometer ban (Mass House Bill 2217 and Representative Marzilli's (D-Arlington) bill both address a state-wide ban on the sale and distribution of mercury fever thermometers, both bills are currently in the Natural Resources & Agricultural Committee co-chaired by Senator Pacheco).

On another front, it has come to my attention that the Cambridge Health Alliance (CHA) is now considering allowing W.R. Grace to commence a substantial excavation for a utility line upgrade and capacity increase for future unspecified uses at their 62 Whittemore Avenue Site without applying the full and most health protective measure of the City's Asbestos Protection Ordinance. It is also my understanding that this excavation will occur in the most contaminated zone of the site with a CHA sanctioned sampling protocol that USEPA has publicly characterized as "meaningless". Given the proximity of this proposed trench excavation to recreational facilities and residences, it is perplexing as to how an award winning Health Alliance would endorse such an action.

As you know, asbestos is a known human carcinogen. Although USEPA associates a 1% threshold in its assessment protocol, there is in fact no known safe level for human exposure. In recognition of this fact, the state of Massachusetts has long held a zero tolerance level specifically for asbestos.

Given this reality, we would urge the Cambridge Health Alliance to implement the following measures all of which are either suggested, implied or manifestly promulgated by the Cambridge Asbestos Ordinance.

1. **Tenting and Venting:** Given the proximity of the proposed trench area to residences and public recreational facilities, this should be an automatic requirement. There should be no question about its applicability particularly considering the role that the public health authority plays in the implementation of the ordinance.
2. **Sampling:** As suggested in the definitions of asbestos contamination, a testing protocol matching current USEPA standards should be required. If USEPA has characterized 5 foot composited samples as "meaningless", WR Grace should be required to re-do them according to a meaningful standard, and should be required to split samples with the City of Cambridge. Given a documented presence of smaller amphiboles within this zone (tremolite, actinolite, and amosite), it would be essential to complement any PLM



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analysis with TEM. An explanations as to why this should occur is unnecessary to a public health authority.

3. It is clear from Grace's Report detailing the excavation that this is not a maintenance project. Grace characterizes it as an "upgrade" and aims to double their power capacity for future uses. The section of the ordinance pertaining to exemptions clearly does not apply here and the public health authority of the City of Cambridge has an obligation to see to it that Grace is not allowed to skirt compliance with the ordinance through this means.

Clearly, if these matters cannot be attended to in earnest by the City's public health officers in a zone of this site which by Grace's own data is the most substantially contaminated, it speaks poorly of that authority and actual public health advocacy in Cambridge.

Based upon our assessment of Cambridge's willingness to create and administer meaningful public health standards as witnessed in the recent actions regarding making Cambridge a mercury free city, we would assume that these actions will be executed immediately and that people living adjacent to the WR Grace facility at 62 Whittemore will receive the full measure of public health protection afforded by the ordinance.

If there is any plausible reason why the above enumerated actions will not be taken, please let us know immediately. We will be happy to follow this inquiry up by the end of the week.

Sincerely,

Bill Ravanese

Bill Ravanese MA, MPH
Boston Campaign Director

ps for your review I am enclosing my monograph, "Breath Taken: The Landscape and Biography of Asbestos" for your review.

cc/ Cambridge City Council

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Communication #5

A communication was received from Bill Ravanese, Health Care Without Harm, Newton, MA urging the City to require tenting and venting and meaningful sampling standards for the proposed trench work at W.R. Grace.

In City Council June 25, 2001

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