



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

APR 28 2015

The Honorable Patrick J. Toomey
United States Senate
Washington, D.C. 20510

Dear Senator Toomey:

Thank you for your March 10, 2015 letter on behalf of your constituent, [REDACTED], concerning the proposed construction of housing units on a former Keasbey & Mattison facility in Ambler, Pennsylvania. [REDACTED] requested U.S. Environmental Protection Agency (EPA) oversight of the project and asked that all land parcels related to a former asbestos processing complex be addressed under the Superfund program.

The proposed construction project referred to by [REDACTED] is called Ambler Crossings. The property on which it will be built, the Bast property, was a former asbestos products manufacturing facility. The Bast property is not being evaluated for inclusion on EPA's National Priorities List (NPL), nor is it the subject of other federal cleanup or enforcement authorities. The property is being managed under the Pennsylvania Department of Environmental Protection's (PADEP) Act 2 Program, which is designed to clean up contaminated sites that are suitable for redevelopment. In 2004, EPA and PADEP entered into a Memorandum of Agreement (MOA) that discusses roles and responsibilities at such properties. For more information about the MOA, please visit:
http://www.epa.gov/brownfields/state_tribal/moas_mous/pa_moa.pdf

Both Ambler Borough and PADEP approved the plans for Ambler Crossings, and PADEP's Act 2 Program is responsible for ensuring that the cleanup is performed properly. The approved plan calls for a capping remedy, which is consistent with EPA's asbestos regulations. Capping is an accepted technology for this property because it will limit the mobility of air-borne contaminants, such as asbestos fibers, and will prevent dermal contact. For asbestos, in particular, inhalation is the most significant exposure route.

In the vicinity of the proposed construction project, there are several former Keasbey & Mattison properties, including two federal Superfund sites that are being addressed by the EPA: the BoRit Asbestos Site and the Ambler Asbestos Piles Site. These Superfund sites once received asbestos-containing waste materials. EPA completed the cleanup work at the Ambler Asbestos Piles site on August 30, 1993 and the site was deleted from the National Priorities List (NPL) on December 27, 1996, having met all of the cleanup requirements under the Superfund law. The BoRit Asbestos Site was listed on the NPL in April 2009, and EPA is currently conducting a cleanup action to stabilize asbestos-containing materials and completing an investigation into the source and extent of contamination at the site.

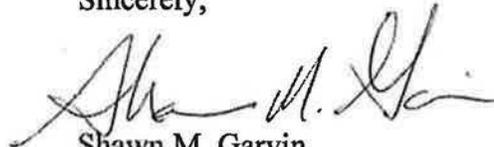


[REDACTED] letter to the editor of the *Ambler Gazette*, published on February 14, 2015, stated that the Bast property “consists of 90 percent asbestos and 10 percent soil to a depth of 21 feet.” We would like to clarify that only one sample showed 90 percent asbestos and that sample was collected at 5-5.5 feet below ground surface. We offer this clarification to ensure that the site conditions are properly characterized based on sound science. Sampling data taken from the Bast property is contained in a report known as the *Langan Report*. It was prepared by a private contractor for a former prospective developer of the Bast property. Detailed information about the Ambler Crossings proposal and the *Langan Report* may be obtained from PADEP's Act 2 program office, and both documents are posted on the BoRit Asbestos Community Advisory Group (CAG) website at: <http://www.boritcag.org>.

EPA has strived to provide a transparent process in which the community may participate in the Superfund process and, in 2009, EPA worked with community members to facilitate the formation of the BoRit Asbestos CAG. Since the CAG's formation, they have elected to expand their scope to consider other properties in Ambler, some of which EPA's Superfund program is not authorized to address. With regard to the Bast property, EPA facilitated two public presentations this year. One presentation was made by the developer to the CAG's Remediation, Redevelopment and Monitoring Committee in late January, and the other presentation was made by the developer and PADEP at the February 4, 2015 full meeting of the CAG.

If you have any questions, please do not hesitate to contact me or have your staff contact Mrs. Kinshasa Brown-Perry, EPA's Pennsylvania Liaison, at 215-814-5404.

Sincerely,



Shawn M. Garvin
Regional Administrator

