



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

MAY 22 2015

The Honorable Stewart J. Greenleaf  
Pennsylvania Senate  
711 North York Road  
Willow Grove, Pennsylvania 19090

Dear Senator Greenleaf:

Thank you for your April 15, 2015 letter to the U.S. Environmental Protection Agency (EPA) on behalf of your constituent, [REDACTED], regarding the proposed construction of the Ambler Crossings development on the Old Bast property located in Ambler Borough, Montgomery County, Pennsylvania.

The Bast property is a former asbestos products manufacturing facility and is 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. 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, including addressing any asbestos-containing materials on the property and potential groundwater contamination. There are no known tanks containing toluene on the Bast property.

The approved plan calls for a capping remedy, as well as taking the necessary precautions to comply with the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and other environmental laws designed to prevent people from being exposed to asbestos during and after construction. Capping is an accepted technology for this property, because it will prevent dermal contact and more importantly will limit the mobility of air-borne contaminants, such as asbestos fibers. For asbestos, in particular, inhalation is the most significant exposure route so the capping remedy is appropriate.

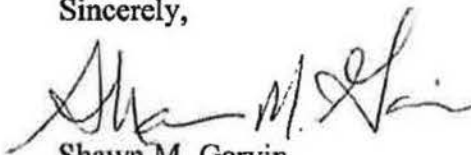
Regarding the reference to the 90 percent asbestos sampling data, please be aware that only one sample showed 90 percent asbestos and that sample was collected at 5-5.5 feet below ground surface. This sampling data is contained in the August 28, 2006 "Act 2 Remedial Investigation Report; Former Nicolet Industrial Site; Ambler, PA" (*Langan Report*). The report was prepared by a private contractor for a former prospective developer of the Bast property. Please note that the *Langan Report* was issued in 2006 and, since then, a number of the conditions described in the report have already been addressed, removed or cleaned up. 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 website at: <http://www.boritag.org>.



Since Bast property is not the subject of federal cleanup or enforcement authorities, nor is it being evaluated for inclusion on EPA's National Priorities List (NPL), the Pennsylvania Department of Environmental Protection's (PADEP) Act 2 Program is the appropriate place to address contamination at this site and any potential redevelopment. In 2004, EPA and PADEP entered into a Memorandum of Agreement (MOA) that delineates our roles and responsibilities to ensure that appropriate cleanup occurs at such properties. In light of the state's involvement at the Old Bast property, EPA action is not warranted. For more information about the MOA, please visit:  
[http://www.epa.gov/brownfields/state\\_tribal/moas\\_mous/pa\\_moa.pdf](http://www.epa.gov/brownfields/state_tribal/moas_mous/pa_moa.pdf)

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

