



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

APR -2 2015

Ms. Sharon McCormick
Ambler Borough Council
122 East Butler Avenue
Ambler, Pennsylvania 19002

Dear Ms. McCormick:

Thank you for your March 24, 2015 electronic correspondence to the U.S. Environmental Protection Agency (EPA) Assistant Administrators Mathy Stanislaus and Cynthia Giles. Please refer to the response we sent to you on March 3, 2015 regarding your concerns about the potential redevelopment of the Bast property, located on South Maple Way in Ambler, Pennsylvania, and the unauthorized installation of a well on the Ambler Asbestos Superfund Site. I would also like to take this opportunity to correct inaccurate information you provided in your March 24, 2015 correspondence.

It's important to recognize that the Ambler Asbestos and BoRit Asbestos Superfund Sites fall under a different set of regulations and authorities than does the Bast property. The Ambler Asbestos and BoRit Asbestos Superfund sites are being addressed under the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), also known as Superfund. As such, these sites are not eligible for Brownfields funding and are not being cleaned up by a private developer.

In contrast, the Bast property is not a federal Superfund site. It is managed under the Pennsylvania Department of Environmental Protection's (PADEP) Act 2 Program and PADEP has the authority to oversee the cleanup of the Bast property, not EPA. Any approved redevelopment of the Bast property will require the appropriate cleanup under PADEP's Act 2 program.

Regarding your concern that the Ambler and BoRit Asbestos Sites have not been cleaned up, I would like to remind you that the cleanup of the Ambler Asbestos Superfund Site was completed on August 30, 1993 and the Site was deleted from the EPA's National Priorities List (NPL) on December 27, 1996, having met all of the cleanup requirements under the Superfund law. The cleanup requirements for the Site were specified in the Record of Decision (ROD), as modified by a subsequent Explanation of Significant Differences. EPA has no plans to re-open the ROD for the Site; however, because asbestos waste was left in place, the site undergoes a review every five years to ensure that the cleanup remains protective of human health and the environment. The next five-year review is scheduled to be completed in September 2017. As you already know from your document review, the fissures on the Ambler Asbestos Site have been documented, and are being evaluated and addressed as part of the ongoing Operation and Maintenance program.



The BoRit Superfund Site was listed on the NPL in April 2009 and is currently undergoing a cleanup action to stabilize asbestos-containing materials. EPA has completed stream bank stabilization on: the Wissahickon Creek, which runs along the perimeter of the site; the Tannery Run Creek, which runs alongside the pile; and, the Rose Valley Creek, which runs between the Reservoir and Park. Storm damage to the Rose Valley Creek stream bank stabilization measures—which was caused by extreme weather events in 2011—was repaired. In addition, EPA has completed the cover on the Pile, which included a liner, clean fill, and grass. EPA is implementing the design for the Park, which is the same as the Pile design. Completion of the Park cover will be delayed while EPA focuses on covering the asbestos-containing materials along the inside banks of the Reservoir.

The Reservoir work began in January 2014. EPA pumped and treated the Reservoir water to meet state regulations for effluent (discharge water) and piped the water into the Wissahickon Creek. EPA is covering the berms of the Reservoir with a geotextile liner and clean fill. When the Reservoir work is completed, clean water will be pumped back into the Reservoir, restoring and improving it. All removal work on the site is anticipated to be completed during 2015.

EPA is also studying the site to determine the nature and extent of contamination and health risks, and will use the results to evaluate potential cleanup options. The work EPA performs during this phase is referred to as the Remedial Investigation/Feasibility Study (RI/FS). The RI Report has been finalized. The FS process, which identifies feasible cleanup alternatives, is underway. Once the FS is complete, EPA will propose a cleanup plan to the community for public comment. We expect this to happen in 2016.

You expressed concern that EPA has not pursued potentially responsible parties (PRPs) to clean up the Ambler Asbestos and BoRit Asbestos Superfund Sites. This is simply not true. The Superfund law requires that EPA identify PRPs, where possible, and compel them to clean up Superfund sites under EPA oversight. In the absence of a viable PRP(s), EPA may clean up sites through the Superfund program, using taxpayer dollars, and seek reimbursement once a viable PRP(s) is identified.

In the case of the Ambler Asbestos Site, EPA successfully pursued PRPs and required them to clean up the site and to reimburse EPA for some of our costs. The PRPs completed construction of the remedies to EPA's satisfaction and continue to conduct the ongoing Operation and Maintenance program at the site. In the case of the BoRit Asbestos Superfund Site, EPA is currently investigating liability. Until then, the ongoing work at the Site is being funded by the EPA's Superfund program, using taxpayer dollars. In the case of the Bast property, EPA has no authority to pursue a PRP(s), because it is not a federal Superfund site.

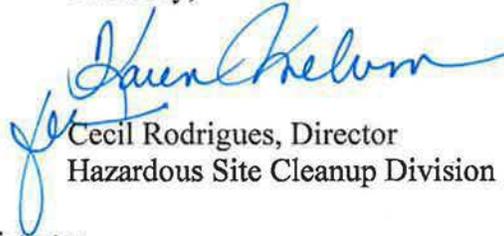
I understand your desire to have all asbestos materials taken out of Ambler, and EPA will evaluate that option for the BoRit Asbestos Superfund Site, as well as other options, during the FS, currently underway. It should be noted, however, that consideration of cleanup options includes evaluation of more than technical feasibility and costs. Cleanup options must also consider issues such as impacts on the quality of life of the most affected residents and neighborhoods, and changes in risk levels that may occur during the short-term phase of the remedial action itself.

I hope this information is helpful. Thank you for your continued interest in the Ambler asbestos issues and for your service on the BoRit Asbestos Community Advisory Group. If there is additional



information that we can provide, please do not hesitate to contact Carrie Deitzel, EPA's Community Involvement Coordinator for the site, at (215) 814-5525 or deitzel.carrie@epa.gov.

Sincerely,



Cecil Rodrigues, Director
Hazardous Site Cleanup Division

cc: Mathy Stanislaus, Assistant Administrator
Office of Solid Waste and Emergency Response

Cynthia Giles, Assistant Administrator
Office of Enforcement and Compliance Assurance

