



## Citizens for A Better Ambler

Discussion Topic: Whitpain Park Cap Failure and Future Recreational Reuse of the BoRit

Presented to the BoRit CAG March 2, 2011

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### Brief History

1. 1969 Whitpain Township leveled an asbestos waste pile and created a municipal park on top of the capped asbestos. The cap on the asbestos waste was in accordance to PA landfill regulations for solid industrial waste. The standard was and still is 2 feet of clean compacted soil and vegetation. The grounds were used as a baseball field and had a tennis court, a playground, a pavilion and a small snack bar shack. It was used primarily by the West Ambler Community.
2. 1983 to 1984, Robert Rittenhouse petitioned the Borough of Ambler, Montgomery County, and the PaDEP to level the pile behind the McDonalds and create a smaller municipal park on the waste.
3. July 1984, PaDEP issues a Notice of Violation to Whitpain Township for inadequately covered asbestos waste ( detected by visual inspection) which leads to an investigation of the Whitpain Park by the PaDEP and USEPA. All recreational use of the grounds is suspended. (at this time USEPA is currently performing a Removal Action on the Ambler Asbestos Piles)
4. Sept 1984, the Whitpain Park is closed after soil sampling detected asbestos at the soil surface at levels more than 1%. The CDC determined that recreational activities on the park grounds could be a risk to human health.
5. Oct and Nov 1984, barbed wire fence and asbestos warning signs are installed around the perimeter of the park including the parcel behind the McDonald's and the reservoir. This fenced in perimeter will become the BoRit Asbestos site.
6. 1984-1988 EPA conducts soil, water and air analysis in and around the park, reservoir and parcel behind the McDonald's as part of the RI/FS for the Ambler Asbestos Piles. EPA also conducts a preliminary assessment of the parcel behind the McDonald's and the Whitpain Park in separate investigations. Up to 30% asbestos is detected at the surface of the soils. EPA deems no further actions of these grounds are warranted citing 95% vegetative cover.
7. 1988 to 1992 the parcel behind the McDonald's is used as a trash to transfer municipal dump site



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and fire training exercises are conducted on the parcel.

8. 1996 to 1998, a public-private partnership between Whitpain Township, PaDEP, EPA, Rohm and Haas, and the Housing and Redevelopment Authority of Montgomery County is forged to try and remediate the Whitpain Park for recreational reuse. An in depth investigation is performed by CAPE Environmental. Potential costs of long term maintenance and insurance are considered inconceivable by the township.
9. 2003 Kane/Core petitions Whitpain Township for development of the park to become a 200+ unit Senior Center.
10. 2003 Wissahickon Valley Watershed Association purchases the Reservoir to be used as a Bird Fowl Preserve
11. 2004 Kane/Core petitions the Ambler Borough for development of the parcel behind the McDonald's to become a 17 story condo/apartment/ storefront complex.

### Past Discussions and Scenarios for Reuse of the Asbestos Contaminated Grounds

1. 1969 Whitpain Township made a pile of asbestos into a municipal park which was closed in 1984.
2. 1975 Univ of PA conducted research regarding the Ambler Asbestos piles to include value and reclamation of the waste and potential reuse of the grounds. A municipal park called a "Skyline Park" and extension of the Green Ribbon Trail to include walking trails was discussed and considered valuable to the Ambler community.
3. 1984 a municipal park was discussed for the parcel behind the McDonald's.
4. 1988 to 1992 the parcel behind the McDonalds was used as a trash to transfer dump site and a site for fire training exercises until the EPA recommend that use of this ground stop.
5. 1996 -1998 an in depth , multi-agency research of the reopening of Whitpain Park occurred
6. 2003 a paintball park was discussed for the Ambler Asbestos Piles.
7. 2003 a housing unit for Senior Citizens was explored for the Whitpain Park
8. 2004 a 17 story high rise development was considered for the parcel behind the McDonald's

Groups that were involved in past discussions of reuse of the contamination:



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1. United States Environmental Protection Agency (USEPA)
2. Pennsylvania Department of Environmental Protection
3. University of Pennsylvania
4. Temple University
5. Borough of Ambler
6. Whitpain Township
7. Pennsylvania Department of Health
8. Center for Disease Control
9. The Housing and Redevelopment Authority of Montgomery County
10. Rohm and Haas
11. 5 private environmental or development firms including Kane/Core and Westrum

\*\* Reuse of the asbestos waste in Whitpain, Upper Dublin and Ambler has been discussed thoroughly and in some cases researched thoroughly for 40 years.

Problems with reuse of the grounds if the contamination stays

1. Liability
2. Costs
3. Long term inspection and maintenance
4. PA and EPA legal requirement of capping the dump set at 2 feet of compacted soil and vegetation (NESHAP)
5. Potential cap failure
6. Current assessment protocols for short and long term health risks and public safety for reuse on top of asbestos waste
7. Volume of the asbestos waste
8. Other toxins detected in the waste

Suggestions, Questions and Directives for Future Reuse discussion



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1. Where in the US has a park on an asbestos contaminated Superfund site been approved, implemented and is currently in use. How was it remediated? How is it being used?
2. What capping protocol or design would be optimal to see such a reuse park project to fruition since the current standard of 2 feet of compacted soils and vegetation is questionable for the long term safety and has failed on the Whitpain park?
3. Who bears the Operating and Maintenance Costs to guarantee and maintain the integrity of the cap?
4. Who bears the responsibility if it were to fail?
5. All possible catastrophic scenarios should be explored in order to abate them.
6. Would the pursuit of independent asbestos experts and toxicologists be a logical step in the creation of the capping design module to insure the utmost safety?
7. Full projected costs for the construction, maintenance and insurance of a capped asbestos contaminated parcel for the short and long term should be thoroughly estimated and weighed against other remedial choices that could also allow recreational reuse of the grounds.