

Q&A – Mr. Salvadore’s email (dated 06/16/09)

Mr. Salvadore, thank you for sending us the pictures. As I stated in my email dated 6/15/09, when I came to the Site that Monday morning (6/15/09), there were no visible signs (e.g., silt residue along Chestnut Avenue) of any water leaving the Site. However, based on the pictures you took on 6/13/09, there was visible runoff from the Site. I would like to add, as we have said before, if you see something, let us know right away. Even if it is during the weekend, we can come out and try to deal with the situation. Because of your pictures, we will make some modifications to the erosion and sediment controls. The best way to reach me is by sending me an email.

Please, find below the answers (*in italic*) to your questions from your June 16, 2009 email. Although EPA tried to answer all your questions, it might be more productive to meet on-site to walk the areas of concern so we can address any other questions you might have about the Site.

A. Off-Site Migration of Material - Visible off-site migration of material into areas traveled by the general public.

Off-site migration of mud within close proximity to the open-air asbestos decontamination area from an apparent temporary overflowing or a sediment trap.

1. What is the design capacity of the decontamination system to accommodate heavy rainfall?
There is no catch basin or system to collect water in the decontamination area. The water from that area infiltrates into the landfill.
2. Did the decontamination area over flow off-site?
As stated in #1 above, the water infiltrates into the landfill, no water is collected; therefore, the area cannot overflow.
3. Is there any possibility that asbestos migrated off-site in photos?
It is very doubtful that asbestos had migrated off-site because all that area has been covered with fabric and average of 6 to 8 inches of compacted gravel, in addition to the original 6 inches of soil cover. After seeing the pictures you took on June 13th, we inspected the area and found out that some of the muddy runoff was from the area closer to the fence line (some was from the last sediment trap). We found that there were some bare spots (minimal vegetation); even on the street side of the fence (we have not done any work on any of those areas). We put down some straw in those areas and will hydroseed them to get some vegetation, which will prevent runoff from getting off-site by slowing down the water.
4. What will be done to prevent migrant of material off the site?
We do not believe asbestos migrated off-site from the area shown in the “section A pictures.” Also, as stated in #3 above, we put down some straw in those areas and will hydroseed them to prevent any future runoff. In addition, we will monitor the water level of the sediment traps and will make sure there is enough room for

precipitation. If there is not, we will pump some of the rain water and discharge it on-site. We would filter the water by using a filter bag as specified in the Erosion and Sediment Control Plan.

5. Why isn't it covered to prevent water flow migration?
The question is not clear. If you are referring to the decontamination area, as stated above, water infiltrates into the landfill.

6. Does the EPA have discharge permit or permission to let mud or other material migrate off site as seen in the photos?
No, the EPA does not have a permit to let mud or other material to migrate off-site. We always do our best to prevent or minimize any off-site migration and as stated above, thanks to your pictures, we will be making some modifications to our controls.

Our erosion and sediments controls were found to be in compliance by the Montgomery County Conservation District inspectors during their inspection on May 19, 2009. Generally, the erosion and sediments controls are in place to handle your "typical" rainfall. On Saturday, June 13, 2009 we got a lot of precipitation in a short period of time.

B. Asbestos Waste - Disturbance and surfacing of creek bed material (asbestos?) accessible to the public up and down stream of the Butler Pike Bridge.

7. Is the material in the photos asbestos (Directly across from the lagoon)?
There are a lot of different materials in the photos. Therefore, it is difficult to say if all of it is asbestos-containing material (ACM). However, it looks like some of it (material in the middle and bottom left and bottom right photos – pieces of tiles, piece of pipe) might be ACM.

8. If not, what is it?
See above.

9. If yes, what is being done about it?
The Removal Action calls for stabilizing the stream banks adjacent to the Site. As you know we finished the Wissahickon Creek bank adjacent to the former park and will stabilize both banks of Rose Valley next. During the work along the Wissahickon, we picked up the pieces that were along the slope and any pieces at the toe (water's edge) and we plan on doing that as we move downstream. However, during the Removal Action, we do not plan to conduct extensive dredging or pickup of pieces of potential ACM in the stream. The Remedial Program might consider doing that during their Remedial work.

B. Asbestos Waste - Disturbance and surfacing of creek bed material (asbestos?) accessible to the public up and down stream of the Butler Pike Bridge.

10. Is the material in the photos asbestos (Down stream from the bridge)?

Again, it is difficult to say if it is asbestos just by looking at the pictures. However, I have walked the Wissahickon Creek many times and know there are ACM pieces downstream of the Site.

11. If not, what is it?

See #10 above.

12. If yes, what is being done about it?

See #9 above.

B. Asbestos Waste - Disturbance and surfacing of creek bed material (asbestos?) accessible to the public up and down stream of the Butler Pike Bridge.

13. Is the material in the photos asbestos (Up stream from the bridge – NOTE: A large tree has uprooted and is across the creek)?

See #10 above. It looks like there are some ACM pieces in those pictures.

14. If not, what is it?

See #10 above.

15. If yes, what is being done about it?

See #9 above.

C. Other Notable – Hazard Identification Signage is not being maintained visible and legible to the public or workers on site that may be necessary to fulfill a duty to warn.

The signs, sidewalk and fence areas are required to be maintained. That is responsibility of the property owners. All signs posted by EPA are visible (vegetation free). We have notified the property owners of the situation.

D. Other Notable – The Health and Safety Plan does not address the need to maintain hazard identification signage, sidewalk encroachment and post storm runoff and should be updated for the protection of the workers as well as the public.

See C above.

E. Other Notable – The side walk and fence line on the north side of the property is not maintained free of vegetation permitting safe use the sidewalk. Poison ivy appears to be growing in large quantities all over the fence as well as protruding into the sidewalk.

See C above.

16. Are these signs, sidewalk and fence areas required to be maintained?

17. If not, why not?

18. If yes, what will be done?

For questions 16, 17 and 18, see C above.

F. Other Notable – Lagoon Stability

19. Due to the recent 4 inches of rain falling, should there be a thorough health and safety inspection be done by someone from the contractors corporate offices to ensure site safety?

Although we got more than 3 inches of water on Saturday, June 13, 2009, the overall current Site conditions are the same as what they were before the rain event (e.g., water levels in the streams came back to normal). In addition, we are currently working on the flat portion of the former park where conditions remain the same. Therefore, there is no need for an additional health and safety inspection.

20. When was the last time someone assessed the stability of the lagoon embankments? I would hate to see the lagoon bank fail and wash out homes and cause destruction downstream.

This is a question for the owner of the property (Wissahickon Waterfowl Preserve).

21. Regardless of what the current owner has done, as the responsible party on site for the health and safety of the workers and the public does the lagoon body of water and it's earth like damn require to have a routine inspection or some type of PA State inspection?

See #20 above. In addition, berm stability had been considered for the work we will be doing along Rose Valley. The Remedial Program might take a closer look at the stability issue of the reservoir.

We are not aware of any state requirements to have the reservoir berm inspected routinely. Nonetheless, we will contact the state and check.