

1POLREP 01 and FINAL
Former Nicolet/K&M Boiler House and Processing Buildings
201 South Maple Way (Boiler House)
South Chestnut Street (Processing Buildings #1 and #2)
Ambler, Pennsylvania 19002

Latitude: 40°09'00.71" N Longitude: -75°13'26.82" W

ATTN:EPA III RRC

I. SITUATION (as of June 22, 2009):

- A. The OSC conducted a removal assessment of the properties identified above on June 22, 2009. The assessment was initiated after local residents expressed concerns about the status of the properties, specifically onsite contamination and the prospects for cleanup.
- B. The OSC reviewed the investigative and proposed cleanup reports on the properties which included descriptions of conditions, previous sampling activities, sampling results and plans for remediation of asbestos and other wastes. It is the OSC's understanding that the cleanup plans outlined in the reports for the former processing facilities have not been implemented except for some minor work. More substantive cleanup activities have occurred at the former Boiler House property but considerable work remains. The future prognosis for complete cleanup is not clear. Following are the reports reviewed:
- Remedial Investigation (RI) Work Plan and Cleanup Plan, Ambler Boiler House, RT Environmental Resources, Inc, June 2007 Revised October 24, 2007.
 - Letter from Anthony Allesandri, RT Environmental Resources to John Zaharchuk, Summit Realty Advisors, LLC, RE: Asbestos-Containing Materials (ACM) Survey for Ambler Boiler House, June 14, 2005.
 - Act 2 Remedial Investigation (RI) Report, Former Nicolet Industries Site, Ambler, PA, Langan Engineering & Environmental Services, April 28, 2006.
 - Pennsylvania Act 2 Cleanup Plan, Former Nicolet Industries Site, Ambler, PA, Conestoga-Rovers & Associates, December 2007.
- C. Before visiting the properties, the OSC contacted each of the three parcel owners by telephone, explained the reason for the walk-through inspection and obtained oral permission for access from each owner. The owner of the former Boiler House accompanied the OSC during the walk-through of each property. The OSC was also accompanied by representatives of EPA Region's Superfund Remedial Program and an Air Program Supervisor with the PADEP.

II. OBSERVATIONS

- A. All participants met at the former Boiler House at 10 am. After introductions, the owner of the former Boiler House parcel permitted the attendees to walk the property freely. Participants walked in both levels of what remains of the building. As indicated in the RI Work Plan and Cleanup Plan, the owner indicated that plans still exist to have the building developed into an office complex if funding and property purchase arrangements can be worked out.
- B. Following are observations made by the OSC while in and adjacent to the former Boiler House. Although the vast majority of the building was traversed, it is possible that sections were not seen:
- Much of the building is open to the surrounding environs in that the roof has been removed and either complete windows or window panes are missing. A fence surrounds the property except along the back adjacent to the SEPTA railroad tracks where a stone wall exists. The fence in the front of the property along Maple Way was removed or rolled back to accommodate construction activities and the placement of gravel piles.
 - No machinery was noted. Little suspect asbestos containing material (ACM) of a friable nature was identified (note the OSC is not a trained as a professional asbestos inspector but has had considerable experience with asbestos sites). A roughly 15' section of overhead pipe in the lower level of the building was wrapped with what appeared to be damaged asbestos insulation.
 - The uppermost floor of the building is devoid of debris except for some areas containing brick and metal. Physical hazards exist due to holes in the concrete floor and protruding metal.
 - Signs of trespassing (e.g. wall graffiti, commercial product debris) were less evident than what appears in the former Processing Buildings but the owner acknowledged difficulties in keeping trespassers out of the building.
 - The lower floor of the building contained approximately 10 old drums, several of which were full or partially full. Contents are not known. The OSC informed the property owner that deteriorating drums should initially be overpacked to prevent tampering by trespassers and all drums ultimately characterized for disposal or recycling.
 - More than 30 empty new drums and approximately 5 empty new totes were present on the lower floor. The owner indicated that these containers will be used to hold #6 fuel oil that will be pumped or manually removed from an underground storage tank on the property.
 - A large pile of rubble, brick and construction debris, roughly 10' high, 12' wide

and 60' long, is located in the rear of the building on the southeast side near the railroad tracks. This pile appears to be a consolidation of several smaller piles discussed in the June 2005 ACM Survey report. PADEP instructed the owner to sample this pile for asbestos analyses to determine how to appropriately address it. PADEP also will likely collect samples from the pile.

- C. Attendees left the former Boiler House property on the side nearest the railroad tracks and proceeded to the first processing facility (hereinafter identified as Processing Building #1.) Following are observations by the OSC while walking in and around Processing Building #1. Most but not all of the building was observed (e.g. the basement could not be accessed safely).
- There is a fence separating the former Boiler House and Processing Building #1 properties. The gate area of the fence is a not well supported.
 - Most of the building is in a deteriorated condition. Windows and doorways are missing, debris is strewn about, roofing has fallen down and vegetation grows wild in some of the courtyard areas. No processing machinery was observed.
 - A large amount of graffiti is present in former Processing Building #1 and some of the graffiti language indicates that trespassers used the property for paint ball games. The building owner indicates that trespassing has been and remains a common problem.
 - Visible, suspect ACM appears in several locations on the floor of Processing Building #1 but it is not strewn about widely. The observed areas of suspect ACM include: a 10' by 10' area with broken asbestos tiles, two small (approximately 3' by 3' by 3') mounded areas of either ACM or milk of magnesia production waste, and approximately six sealed bags of waste marked as asbestos-containing located in an area below a portion of the building floor. This floor portion appeared to be made of an asbestos containing material and was significantly damaged. This material was wet due to its exposure to outside weather. The roof of one area of the building fell to the floor (after a fire?) and it is not clear what is mixed in with what appears to predominantly be wooden boards.
 - In one portion of the building many newer, modern windows exist and interior concrete walls are covered over with drywall indicating that refurbishing of a large portion of the building was attempted at one time. However, much of the drywall is covered with graffiti/paint spray and contains both large and small holes caused by human activities. A large portion of the aluminum framing used to support the drywall was torn down and lies twisted on the floor. It appears that trespassers caused this property destruction.
- D. Leaving Building #1, the participants proceeded toward the second former processing facility (Processing Facility #2). Following are the OSC's observations. Again, every segment of the building was not visited although the vast majority was

observed:

- A fence separates the two processing facilities but the fence was cut by trespassers in one area to allow easy access through it. In another location along this fence, a wooden pallet was propped up along it to allow for climbing over the top. A portion of the fence located adjacent to the railroad tracks was torn down permitting access from this side of the property.
 - A small area (10' by 10') of asbestos roofing material and/or tiles was lying on the ground in a heavily vegetated area within several feet of the fence.
 - The buildings are in deteriorated condition. Several of the concrete walls have large holes, doors and windows are missing and debris lies on the floor in a large percentage of the building. No refurbishment activities were identified in this building.
 - Graffiti is excessive. Paint ball activity was evident. Lack of lighting in many building locations made walking difficult.
 - A processing area of some type, evidenced by four cylinder-shaped objects (roughly 3' high and 2' in diameter), remains in the building. Small areas of suspect ACM appeared around this area. No other machinery was noted.
 - Visible suspect ACM only appeared sporadically on the building floor. Some of this ACM appeared to be of a friable nature.
- E. After leaving Processing Building #1, the attendees walked toward South Chestnut Street and observed exterior conditions.
- The majority of the exterior ground is either heavily vegetated or covered with asphalt, gravel or concrete.
 - The fence leading into the site from South Chestnut Street was locked and there were no signs of vandalism (graffiti, discarded commercial products, fence damage, etc.).

III. ACTIONS/CONCLUSIONS

- A. The PADEP Air Program official instructed the owner of the former Boiler House to sample the large pile for asbestos before transporting or handling it. The OSC directed the owner to address the old drums and awaits a status report. The OSC explained to the owner that Ambler residents were focusing attention on the former Boiler House (and Processing Facilities) and he will likely be under greater scrutiny to address trespassing issues and take prudent measures to protect public health from potential

asbestos exposure. It is the OSC's understanding that a PADEP Air Program inspector has visited the site several times since the June 22 visit to observe owner activities.

- B. Because they did not participate in the visit, the OSC contacted the owners of the two Processing Facilities after the walkthrough to identify his observations. Photos were sent to one of the owners to show the presence of suspect ACM on the building floor. The OSC also informed the two owners of growing public scrutiny and stressed efforts to secure access as best as possible. The OSC acknowledged that, based on his observations, trespassers appeared determined to enter the properties and it may take cooperation from parents and township officials to reduce the number of trespassing incidents. The PADEP Air Program official informed the owner of Processing Building #2 that the rear fence required repair.
- C. The OSC informed the EPA Region III Asbestos Program of his observations.
- D. The OSC recognizes that the investigative sampling reports identified in Section I.B. above identify significant contamination, primarily at the Processing Buildings and adjacent grounds. The reports identify the presence of a large amount of ACM much of which is in the basement of Processing Building #1 but is also part of building components (e.g. floor tiles, plaster, insulation, electrical panel board, cement roofing panel). Significant asbestos contamination of surface and sub-surface soil is present. Elevated levels of inorganic in historic fill are noted. The groundwater below the site is contaminated with volatile organic chemicals, primarily toluene. Several underground tanks are on the property, one or more may contain toluene.
- E. The OSC believes that a Removal Action by the EPA Superfund Removal Program is not needed provided: (1) the waste drums at the former Boiler House are adequately addressed, (2) any disturbance of asbestos-containing soils or -waste does not occur or is carefully controlled and monitored, and (3) the property owners implement and maintain diligent, reasonable measures to restrict access to the properties in an attempt to prevent community exposure to hazardous substances. Physical hazards may well present the greatest threat to trespassers and, although the OSC does not have authority to address such hazards, they alone warrant continuing efforts to restrict access (again acknowledging obvious difficulties and frustrations experienced in the past by the owners regarding continuous trespassing). The conclusion that a EPA Superfund Removal Action is unnecessary is supported by the OSC's understanding that the properties are targeted for remediation (for asbestos and other contaminants) under PADEP's Act II cleanup program. In addition, asbestos issues at the former processing facilities will be addressed by the PADEP program administering the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations as it pertains to asbestos. The OSC determines that the underground tanks, contaminated groundwater and historic fill do not present a threat of an immediate nature requiring a Superfund Removal action.

IV. FUTURE ACTIVITIES

- A. No additional actions are planned beyond the OSC's following up on the status of the waste drums. The OSC will reevaluate this conclusion as new information warrants.

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