CENAP-EC-EG

MEMORANDUM FOR FILES

SUBJECT: Ambler Asbestos Piles Superfund Site, OU1 & OU2, Ambler, PA – Site Inspection Report

1. **DATE OF INSPECTION:** 8 December 2015, 0900 HRS to 1200 HRS.

2. PARTICIPANTS:

Peter Williams Bartlett Tree Experts (subcontractor to WSP Group)

Gregory Voigt EPA Region III

Timothy Cherry PADEP Richard DePasquale USACE Travis Fatzinger USACE

Robin Wright WSP Group (O&M contractor)

3. **WEATHER:** Sunny, average temperature 37°F with a high of 51°F.

4. **PURPOSE:** Conduct a quarterly site inspection.

- 5. **BACKGROUND:** The US Environmental Protection Agency (EPA) and the US Army Corps of Engineers (USACE) have entered into an interagency agreement (IA) to evaluate and oversee ongoing operation and maintenance (O&M) activities that are currently being performed by the Potentially Responsible Parties (PRPs) at the Ambler Asbestos Piles Superfund Site. A baseline inspection under the IA was performed on 3 Sep 2015. The PRP for the site is Federal Mogul. The site is approximately 25 acres and was historically used to dispose of process waste and off-spec asbestos products between approximately 1890 and 1974. There are 4 distinct piles on the site as shown on the attached map, comprising OU-1 and OU-2. The site was listed on the NPL in 1986. Primary remediation activities were completed in 1993. The remedy typically consists of a soil cap placed over a separation geotextile, with additional drainage features on the plateau of the landfills. The site was taken off the NPL in 1996.
- 5. **ACTIVITIES:** No O&M work was being performed on site during the site inspection.

6. INSPECTION OBSERVATIONS.

All participants met at the Chestnut Street access gate and started the inspection at approximately 0900 hours. We first walked up the access road to the top of the Upper Locust Street Pile. Vegetation on the access road had been recently moved by Bartlett Tree Experts.

Vegetation that was observed on the Upper Locust Street Pile (see attached map) during the September inspection had been recently mowed. According to Mr. Williams, the vegetation rebounds after mowing and he will begin spraying it with an herbicide in spring.

All previously observed holes in the fence had been patched using permanent crimp type connectors (see Figure 2). These patches will deter people from entering the site that do not have tools to cut the fence. Asbestos rings were observed hanging on some of the fence supports (see Figure 3). The rings are presumably found outside of the site in the Wissahickon Creek and placed there by pedestrians. WSP will remove and dispose of them properly.

Figure 1: Plateau of the Upper Locust Street Pile looking north towards outlet box.









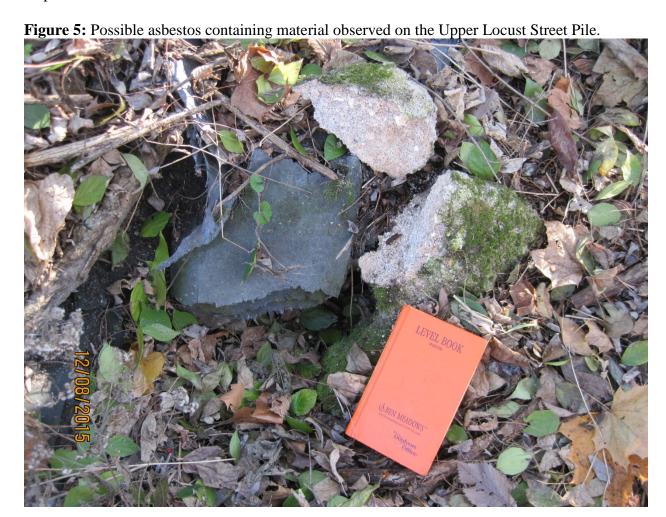
The Lower Locust Street Pile is in a similar condition to the Upper Locust Street Pile and has vegetation growing across the gravel that has been mowed. This vegetation will also be part of Mr. Williams's herbicide program in spring. The plateau drains for both Locust Street Piles appeared to be in good condition.





Debris was found along the path on top of the Upper Locust Street Pile at approximately 40.14907, -75.22566. There was a substance that looked like concrete, but was brittle and easy to break. There was also a grey fiber board located in the same area (see Figure 5). It is unclear if either of these items contain asbestos or if they are merely residential waste illegally dumped on site over the years. WSP will have these items tested for asbestos content.

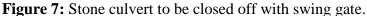
The inspection team also saw downed trees at 40.14960, -75.22673 and 40.14903,-75.22511. There were animal burrows at 40.14924, -7522617; 40.14914, -75.22491; and 40.14909, -75.22480. The soil cover should be repaired in these areas as soon as possible. See the attached map for reference.



The gate along the right-of-way leading to the Wissahickon Creek between the Plant Pile and Upper Locust Street Pile has a gap large enough to permit human access (see Figure 6). This should be fixed as soon as possible to limit entry. Suggestions include adjusting hinges on both gates and replacing the missing pipe between the gates to narrow the gap. There are numerous pieces of trash along the inside of the fence including old appliances, tires, and drums that should be removed and disposed of properly. Another smaller fence gate in this area has a large opening underneath the gate due to erosion. WSP agreed to fill in the area under the gate to limit access.



The fence near the "brick drain" outlet located along the southwest side of the Upper Locust Street Pile is still clogged with debris from flooding. The EPA, USACE, WSP, and Bartlett discussed alternatives to the current fence running across the culvet. It was decided that WSP will have the clogged fence removed and add to the existing perimeter fence to maintain restricted access. A swing gate similar to one installed for the BoRit project along Maple Street will be installed across the culvert. This will limit children from entering the culvert but will allow water and debris to flow freely. WSP has proposed to line the channel with geotextile and rip rap. Some minor regrading/filling may be necessary to reestablish the channel subgrade prior to installing the geotextile and riprap. See attached drawings for three designs from the Borit gate.





The concrete embankment along the Wissahickon appeared to be in good condition. However, vegetation is starting to grow along the edge of the water (see Figure 8). Due to the close proximity of the water, herbicide will not be used to kill these plants, they will be cut by Mr. Williams until the roots eventually die.

Figure 8: Looking north along the Wissahickon Creek, note vegetation growing along the creek bank.



Unlike the Locust Street Piles, the gravel area in the middle of the Plant Pile is mostly clear of vegetation (see Figure 9). The outlet box's concrete lid was off and lying next to the box. The lid should be put back on the outlet box to prevent possible vandalism to the exposed cap subdrain pipes. The inspectors did not note any significant change in the size of depressions or tension cracks in the pile since the previous inspection. The repairs to erosion on the side slopes are scheduled to be completed this winter and therefore the same recommendations from the previous inspection are included in section 7. The inspectors discussed options to repair and monitor the rest of the pile. WSP will submit a proposal in the future.

Figure 9: Plateau of the Plant Pile.



7. SUMMARY OF RECOMMENDATIONS.

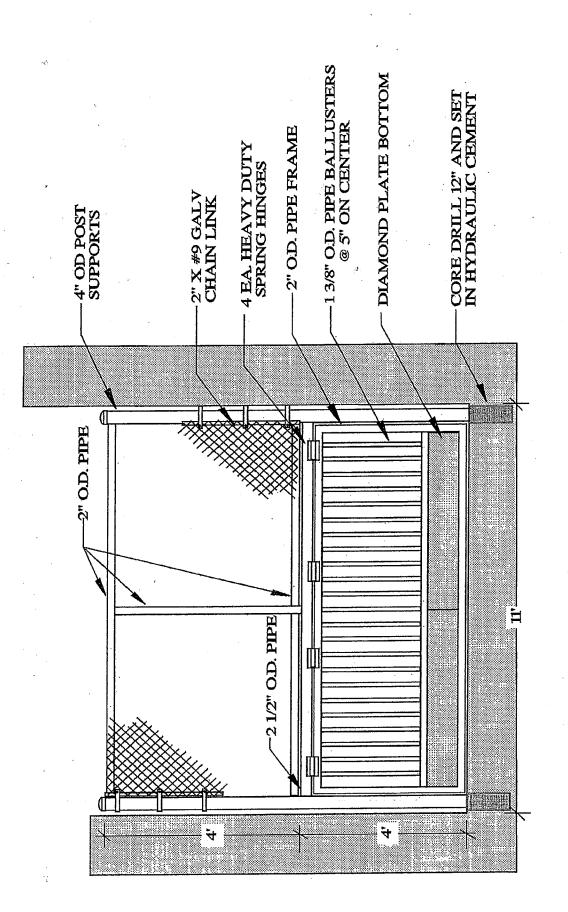
Based on conditions observed during the site inspection, general O&M recommendations are summarized below. The suitability/design of the recommendations would be the responsibility of the PRPs.

- 7.1 The vegetation encroaching on the Locust Street Piles and the Plant Pile should be killed and removed on the pile plateaus. The extent of vegetation removal should extend to within a few feet of the top of slope on the plateaus. Any dead trees on the slope should be cut and removed. (Figures 1, 2, 4, 7, &10)
- 7.2 Vegetation growing along the water's edge at the toe of the concrete embankment along the Wissahickon Creek should be killed and removed. (Figure 5)
- 7.3 The clogged fence at the drainage outlet should be removed and a swing gate should be installed on the stone culvert. The site should be secured by adding fence or making it higher as required. The erosion at the outlet should be repaired using geotextile/rip rap and possibly some fill to reestablish the eroded subgrade. (Figure 6)
- 7.4 The concrete lid of the Plant Pile outlet box should be put back on the box. (Figure 8)
- 7.5 The erosion along the Plant Pile's slopes in the southeast and southwest corners should be repaired. After the areas are topsoiled and reseeded as part of the repair, the area should be covered with a non-degradable erosion control mat to assist in reestablishing vegetation. (Figure 9)
- 7.6 The drainage and cracking issues on the Plant Pile should be addressed before they become a bigger problem. WSP should submit a work plan detailing their proposed fix.
- 7.7 Holes in the soil cover should be repaired at: 40.14960, -75.22673; 40.14903, -75.22511; 40.14924, -7522617; 40.14914, -75.22491; and 40.14909, -75.22480.
- 7.8 Trash at 40.14907, -75.22566 should be tested for Asbestos containing material.
- 7.9 The numerous pieces of trash and larger debris (e.g., old appliances, tires, and drums) along the inside of the right of way perimeter fence should be removed and disposed of properly.
- 8. **QUESTIONS:** If you have any questions or concerns, or would like to view the photographs taken, please contact the undersigned at 215-656-6681.

Sincerely,

TRAVIS FATZINGER, P.E. Geotechnical Engineer





347

