

# Community Update

## Asbestos Release Site

### CERCLA Actions

National Park Service  
U.S. Department of the Interior

Valley Forge  
National Historical Park



November 2017

March 2018 to October 2018

#### SITE BACKGROUND

The Asbestos Release Site (Site) is an approximately 112-acre area located in the center of Valley Forge National Historical Park (VFNHP) in Pennsylvania. In the fall of 2017, NPS completed a long-term remedial action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, to address contamination located on the Site

that had resulted from historical industrial activities of the Ehret Magnesia Company and its successors.



The Ehret Magnesia Company, late 19<sup>th</sup> century

During the 19<sup>th</sup> century, portions of what is now VFNHP were quarried for limestone. From the 1890s to 1970s, the Ehret Magnesia Company and its successors manufactured asbestos-containing insulation products at a plant located on private land within what is now the park. The products were manufactured by combining asbestos fibers imported from Canada with magnesium carbonate from the dolostone present within the local limestone deposits. The manufacturer disposed of asbestos-containing slurry waste by pumping it through pipes and into quarries or by directing it to a waste channel constructed in a natural drainage swale that discharges to an unnamed tributary of the Schuylkill River. The slurry waste placed in the quarries was subsequently covered with soil and in some locations, asphalt.

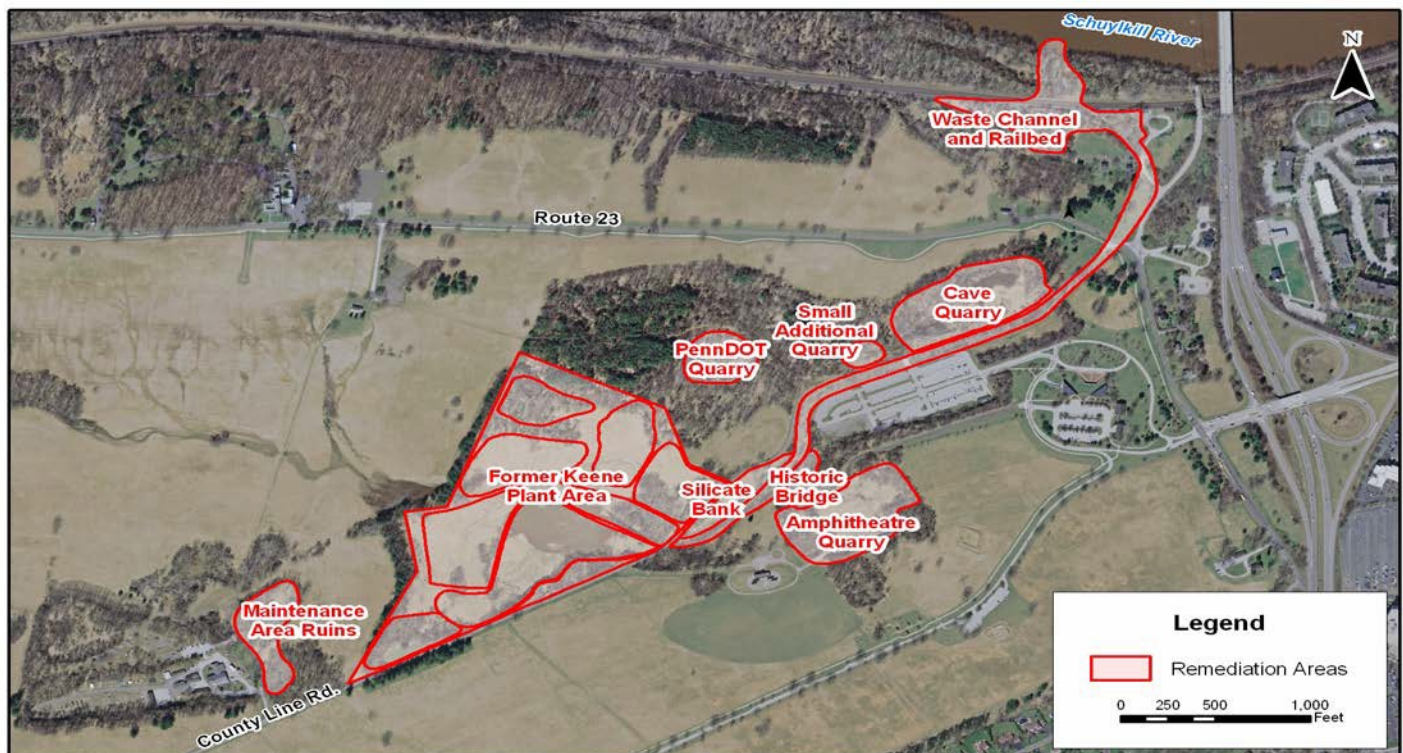
Some of the quarries used for waste disposal by Ehret became part of Valley Forge State Park after it was established by the Commonwealth of Pennsylvania in 1893 to preserve lands used by the Continental Army during its 1777-1778 winter encampment. On October 13, 1976, the U.S. government established Valley Forge National Historical Park. Land acquired by the U.S. government for establishment of the park included contaminated land that was formerly part of Valley Forge State Park as well as the adjacent privately owned 46-acre parcel where the inactive Ehret manufacturing plant was located. In the late 1970s, NPS removed all buildings associated with the former Ehret manufacturing plant.

NPS discovered asbestos-contaminated soil in 1997 during the excavation of a fiber optic cable trench. To address the immediate risk to the public that could have been posed by a potential airborne release of asbestos, the U.S. Environmental Protection Agency and NPS initiated a short term response action

under CERCLA. Activities completed included removing asbestos-contaminated materials, covering areas with clean soil or a cement-like soil binding agent and grass seed, and installing warning fence and signs to prevent public access to potentially contaminated areas. Results of air sampling indicated that no asbestos was released during these activities. After the initial CERCLA short term response action was completed, NPS began activities required to permanently and significantly reduce any dangers associated with release or threat of release of hazardous substances from the Site through the completion of a long-term remedial response action under CERCLA.

## ENVIRONMENTAL INVESTIGATIONS

NPS and the Commonwealth of Pennsylvania entered into an agreement in 1999 by which the commonwealth, under NPS direction and oversight, would develop a CERCLA Remedial Investigation and Feasibility Study (RI/FS) for the Site. The RI report was completed in February 2005. Based on the results of the RI, fifteen areas of concern (AOC) were identified. Risk analysis completed during the FS, prepared in September 2006, indicated that nine of these 15 areas contained levels of contaminants including asbestos, semivolatile organic compounds (specifically polycyclic aromatic hydrocarbons [PAHs]), and three metals (lead, mercury, and arsenic) at levels that may cause unacceptable risks to humans and/or ecological receptors. The nine areas identified where remediation activities were determined to be required are shown on the map below.



To address the unacceptable risk posed to human health and the environment from contaminants on the Site, remedial alternatives were identified in the FS. The Preferred Alternative selected for cleaning up the Site was the remediation of contaminated soils located within two feet of the ground surface. This alternative was selected because it provides long-term protectiveness of human health and the environment and can be implemented in a cost-effective manner. In addition, it is the alternative most consistent with the management and goals of the NPS. The Preferred Alternative was identified and presented to the public in the *Proposed Plan for Clean-up of the Asbestos Release Site*, issued by the NPS for public comment on September 22, 2006. After the formal public comment period ended on November 6, 2006, NPS reviewed public comments, determined that no significant changes to the Preferred Alternative were necessary or appropriate, and chose the Preferred Alternative as the Selected Remedy for the Site. The Selected Remedy was presented in the Record of Decision (ROD) issued for the Site on January 18, 2007.

In spring 2010 the commonwealth and federal government reached a cost-sharing agreement and dedicated funds for remediation of the Site.

### **SITE CLEAN-UP ACTIVITIES**

In 2012, after preparation of a remedial design which provided the specific steps to be taken to clean-up the Site, NPS solicited and selected a contractor to implement the remedy. In spring 2013, this contractor began clean-up of the Site under NPS oversight. As stipulated by the ROD, as each area defined in the remedial design was cleaned, NPS collected soil samples to ensure that all contamination located within the top two feet of soil had been addressed.. Results from analysis of these samples indicated additional contamination remained within the top two feet of soil on the Site. During the winter of 2016, NPS delineated the additional areas requiring remediation and prepared a design to delineate these areas. In fall 2016, NPS solicited a contractor to implement the final phase of clean-up for the Site. Final clean-up was completed in the fall of 2017. After trees and meadow grasses planted as part of the clean-up are sufficiently established, the entire area will be re-opened to the public.

### **COMMUNITY INVOLVEMENT**

Community involvement is an important part of the CERCLA process. The RI/FS and Proposed Plan for the Site were released for public comment in September 2006 and a public meeting was held on September 28, 2006 to present the Proposed Plan and to accept oral and written comments. Responses to all public comments received can be found in the Responsiveness Summary included in the ROD, which is posted as a link on the Valley Forge Asbestos Release Site webpage of the VFNHP website and can be found in the information repositories listed below.

Information repositories have been established that contain the Site administrative record files. CERCLA administrative record files consist of those documents that formed the basis for the selection of the Site cleanup action. They include copies of all Site-related environmental investigations, ecological and human health risk assessments, community relations materials, public comments, and responses to significant comments completed prior to the release of the ROD. Information about the Site is also available on the VFNHP website: <http://www.nps.gov/vafo/parkmgmt/asbestos.htm>

### **ASBESTOS RELEASE SITE INFORMATION REPOSITORIES**

Valley Forge National Historical Park  
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### **FOR MORE INFORMATION**

If you have questions concerning the information contained in this Community Update, please contact Donna Davies, project manager at (484) 663-1043, [Donna\\_Davies@nps.gov](mailto:Donna_Davies@nps.gov).