

# Overview of the Asbestos Release Site CERCLA Actions

National Park Service  
U.S. Department of the Interior

Northeast Region

Valley Forge  
National Historical Park

Fall 2010



## A SITE HISTORY

The Asbestos Release Site (the Site) is an approximately 112-acre area located in the center of Valley Forge National Historical Park (VFNHP) in Montgomery County, Pennsylvania. The Site is the location of an upcoming remedial action.



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

In the early 1800s, portions of what is now VFNHP were quarried for

limestone. From the early 1890s to 1970s, the Ehret Magnesia Company and its successor, the Keene Corporation, manufactured asbestos insulation products at a plant located on private land within what is now the park. The products were manufactured by combining imported asbestos fibers with magnesium carbonate from the dolostone present within the local limestone deposits. The manufacturer disposed of asbestos slurry waste by pumping it through pipelines into the former quarries or by directing it to a waste channel constructed in a natural drainage swale that runs to the Schuylkill River. The slurry waste placed in the limestone quarries was subsequently covered with soil and in some locations, asphalt.

To preserve the lands on which the Continental Army established its 1777-1778 winter encampment, the Commonwealth of Pennsylvania established Valley Forge State Park in 1893, eventually comprising most of the contaminated lands. In 1976, the U.S. Congress authorized the establishment of VFNHP and the Valley Forge State Park became a unit of the National Park System.

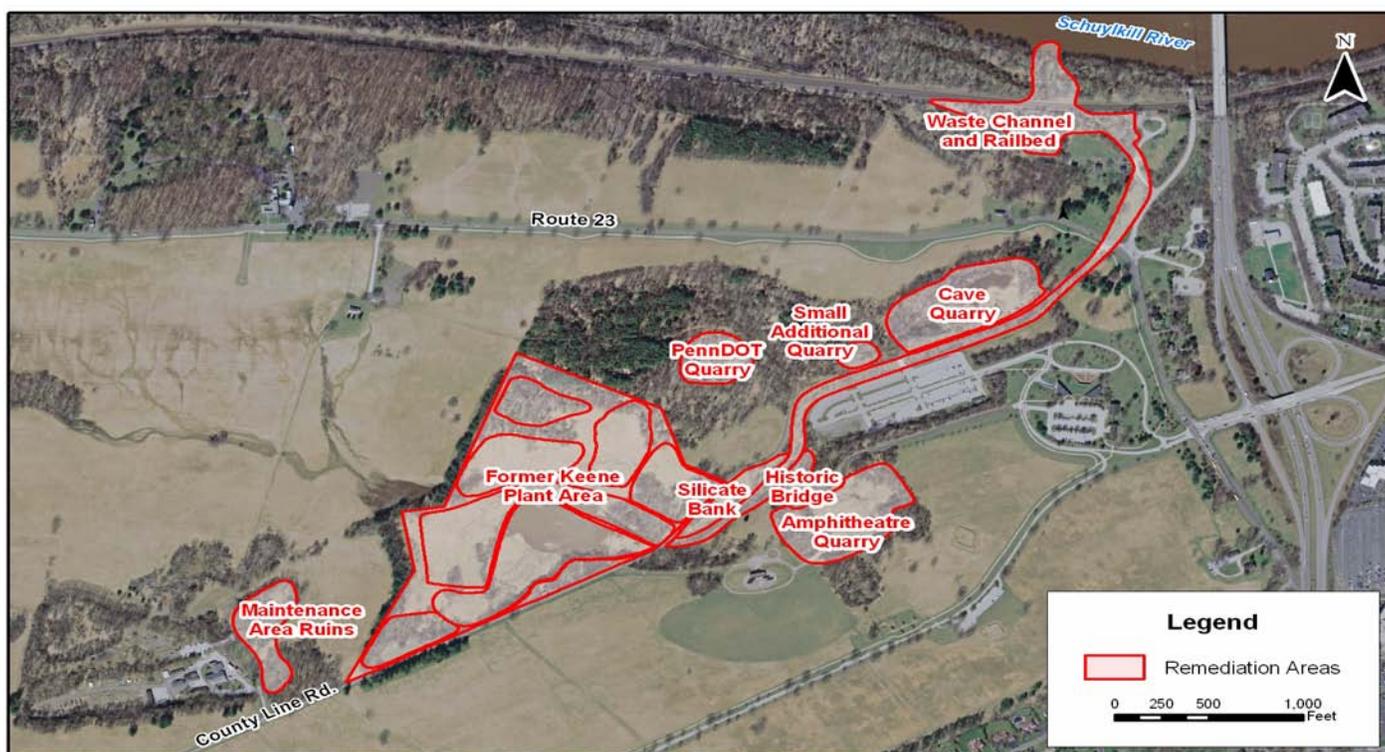
The National Park Service (NPS) discovered the asbestos contamination in 1997 during the excavation of a trench for a fiber optic cable. To address the immediate risk to the public that could have been posed by a potential airborne release of asbestos from contaminated soil, the U.S. Environmental Protection Agency (EPA) and NPS initiated a response action. Actions completed to address the immediate risk to the public 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 the response action. The EPA/NPS response action was completed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA is a federal law that provides authority and guidance for short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response and long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening.

## AND NOW

The Site comprises rolling hills, open grass covered fields, wooded areas, wetlands, former limestone quarries, and many features that suggest the industrial history of the land, including ruins and rail road grades. The entire 112-acre Site remains closed to the public.

## UPDATE ON 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 where remediation activities will be completed 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 is the shallow excavation and off-site disposal of contaminated soils that pose unacceptable risks. 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, the NPS reviewed the received public comments and 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 of Pennsylvania and the federal government reached a cost-sharing agreement and dedicated funds for the remediation of the Site. The NPS is currently preparing the remedial design documents that will outline the steps to be taken to achieve the goals of the Selected Remedy and to provide the technical specifications for construction of the remedy, including planning and implementation reports, drawings, and site-specific plans. Physical cleanup of the Site is expected to begin in Fall 2011. Once the site is remediated, the entire acreage will be reopened to public use.

## **COMMUNITY INVOLVEMENT**

Community involvement has been an important part of the CERCLA process. The RI/FS and Proposed Plan for the Site was 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 of the public comments received can be found in the Responsiveness Summary included in the ROD.

Information repositories have been established in the two locations identified below. These repositories contain the CERCLA administrative record files for the Site and include copies of all Site-related environmental investigation including the RI/FS, ecological and human health risk assessments, the ROD and other Site-related documents. Information about the Site is also available on the VFNHP website:

<http://www.nps.gov/vafo/parkmgmt/asbestos.htm>

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## **FOR MORE INFORMATION...**

If you have any questions concerning the Asbestos Release Site CERCLA remedial action, please contact Donna Davies, project manager at (610) 793-1006.