Message

From: Michael Towle [Towle.Michael@epamail.epa.gov]
Sent: 9/22/2017 5:42:07 PM
To: Towle, Michael [Towle.Michael@epa.gov]
Subject: Fw: NVF Kennett Square June 24

FOR EPA FILE
----- Forwarded by Michael Towle/R3/USEPA/US on 09/22/2017 01:41 PM -----

From: Michael Towle/R3/USEPA/US
To: gbeer@delvaldevco.com,
Cc: pmiller@envalliance.com, [redacted]@kennett.net, tbuterbaugh@state.pa.us, "Payne, Walter" <wpayne@state.pa.us>, Paul Gotthold/R3/USEPA/US@EPA, Gerald Heston/R3/USEPA/US@EPA
Date: 06/25/2010 10:22 AM
Subject: NVF Kennett Square June 24

George -

Thank you for facilitating our evaluation of the present conditions at the former NVF facility in Kennett Square on June 24, 2010. As I explained, the U.S. Environmental Protection Agency (EPA) had received information from at least one concerned resident that suggests there are concerns relating to 1) the recent fire, 2) the future property development upon contaminated land, and 3) potential threats posed by the upcoming demolition of the facility. I understand that the fire rubble will soon be addressed and that you intend to address property remediation (and tank closure) through the Pennsylvania Land Recycling process. As such, the focus of my request to evaluate the present conditions deals mainly with the potential for threats to occur to human health and environment during or as a result of the demolition process.

As I also explained, the EPA has conducted and directed response actions relating to PCBs releases from this facility in the past. EPA has also conducted response actions relating to wastes (many from the NVF facility) located at the adjacent Junkyard property. These response actions have contributed to our understanding of the potential for PCBs, including atypical aroclor mixtures not normally detected by standard analytical methods, to be part of the process of circuit board production at the NVF facility. As such, it is possible that certain unknown manufacturing components of the facility may have PCB mixtures within the resins used to produce circuit boards. It was also apparent during our visit of June 24, 2010, and from previous reports, that chemical residuals from NVF's manufacturing process are still present in the piping and the manufacturing equipment at the facility and could pose a threat to workers, nearby residents, and downstream handlers of scrap material alike if not identified, handled and/or addressed appropriately. Although it did appear that large amounts of the interior of the facility were already scrapped and removed, I would suggest that your company complete further work with a better understanding of the potential remaining chemical hazards in the tanks, lines, equipment, and structural components possibly contaminated by chemical releases in the past. I did note that known PCB containing equipment (hydraulic press) possibly regulated by EPA was already removed and may have been removed long before your tenure.

During our evaluation, I suggested that a detailed inventory of the remaining chemical hazards in tanks, drums, equipment, and lines would be helpful for you, the Borough, and future workers to better understand and scope future work. Additionally, such an inventory and a work plan which considers the chemical hazards is the best method to assure that future workers, the nearby residents, and any downstream handler of salvaged material are protected from chemical hazards. Of importance to the overall dismantlement and demolition process would be actions that 1) identify and address any asbestos, 2) identify and address flammable or ignitable or combustible chemicals in tanks and lines, and 3) identify and address PCB contaminated materials (including the potential for PCBs types not detected in standard analyses). I understand that Delaware Valley Development is preparing to submit demolition plans to the Borough and will be engaging the services of an environmental consultant to advise on appropriate components of the plans relating to chemical hazards. I encourage Delaware Valley Development to consider the potential threats we discussed in these plans.

I may be reached at Towle.Michael@epa.gov or at 215-287-2443 for further information.