

Meeting Notes

KOP BID Sub Station Assessment & Planning

February 13, 2025 – 2pm

Attendees:

Chris Basler, King of Prussia Business Improvement District -chris@kopbid.com

Anna Leisher, Montrose Environmental – annaleisher@montrose-env.com

Lydia Work, Montrose Environmental – lwork@montrose-env.com

Alan Musoke – CFO for American Baptist Churches USA (ABC) - alan.musoke@abc-usa.org

Invited:

Anita Densmore, ABC - Anita.Densmore@abc-usa.org

Iris Cobb, ABC - Iris.Cobb@abc-usa.org

Background:

The meeting was held via zoom and hosted by the KOP BID. Chris Basler arranged the meeting to discuss moving forward with Phase II sampling and remediation planning to address the potential presence of contaminants on an inactive substation (the site) located at 640 Freedom Business Center Drive in King of Prussia.

The site is part of a larger parcel that is owned by the ABC that includes a business and commercial campus. The KOP Bid is working to plan and install public space on a portion of the parcel that includes the substation.

A rendering has been created that shows a vision of removing the chain link fence, replacing the fence with a decorative slat fence, painting the substation superstructure, removing the vegetation that is currently within the fence, and installing a landscape planting area around the fenced in area. Designs for the surrounding area have also been created that would create a park space and food truck vending area in the nearby vicinity of the site.

The Montgomery County Redevelopment Authority (MCRDA) provided resources through its US Environmental Protection Agency (USEPA) Brownfields Grant to have a Phase I Environmental Site Assessment (ESA) completed for the site. The Phase I ESA was completed in December of 2024 by Montrose, and the associated report was provided to the KOP BID and ABC. The report recommended that a Phase II ESA be completed to determine if the surface soil within the fence contains polychlorinated biphenyls (PCBs).

Meeting Notes:

- Participants introduced themselves.
- The group discussed the KOP BIDs interest in improving the site.
- Mr. Musoke shared that there is not an immediate interest in selling the property. The property is under a lease for the next 9 years. Depending on conditions when the lease is up,

there could be an interest in selling the property. He clarified that the ABC is not willing to incur costs to improve or remediate the property if contamination were discovered.

- As concluded in the Phase I ESA report, Ms. Work explained that it is recommended that sampling occur on the substation soil to determine if PCBs are present. Because electric sub-station structures are known to commonly contain PCBs, PCBs are a potential contaminant of concern.
- If there is PCB contamination on the site, there is a risk that site users could be exposed, especially if the site is to be activated as a public open space.
- It was noted that it would be of interest for the ABC to be aware if transformer fluid has been drained from the structure since it was deactivated. If the fluid has not been removed, it is recommended that a qualified professional remove the fluid and dispose of properly.
- The US EPA Brownfields program is associated with voluntary assessment and cleanup of properties. However, PCBs are regulated by the US EPA's Toxic Substances Control Act. If Phase II sampling discovers that there are elevated levels of PCBs above a certain threshold (which may be 50 PPM), there could be EPA enforcement and reporting requirements.
- Ms. Work mentioned that it is possible that PCBs have not spilled on the soil and that sampling would find the soil to be clean, but the outcome is unknown.
- If the property is to be sold or leased in the future, an understanding of the environmental status and/or protective measures may be helpful.
- Ms. Work discussed the importance of protecting human health and the environment. If testing was not to be performed, she recommended capping the soil in accordance with the Pennsylvania Department of Environmental Protection's soil capping guidelines as a preventative measure. She also recommended to ABC a covenant be considered that would require maintenance of the cap in perpetuity and limit the use of the property. Capping guidelines are provided as a separate attachment along with these meeting notes.
- There was discussion about the PA DEP's ACT 2 cleanup program as well, which provides guidance for remediation and would result in certifying that the site is safe. There are fees associated with the program.
- It is understood that the ABC's position is to not move forward with assessment activities or providing site access if there are potential costs.
- Ms. Leisher mentioned that the MCRDA is managing resources that can assist with brownfield assessment and cleanup. The site is eligible to use resources for assessment and planning. To be eligible for cleanup funding, the site may need to be conveyed to a different entity to manage the cleanup. Note: an arrangement that the property would transfer back to the ABC after remediation can be made.