

October 25, 2021

Mr. Michael E. Guerin
National Grid
40 Sylvan Lane, 1st Floor East,
Waltham MA 02451

Re: Letter of Technical Deficiency
Philadelphia Coke Plant
eFACTS PF No. 831308
4501 Richmond Street, Bridesburg
City & County of Philadelphia

Dear Mr. Guerin:

The Department of Environmental Protection (DEP) has received and reviewed the July 2021 document titled “Remedial Investigation Report and Cleanup Plan” (report), received on July 30, 2021, for the property referenced above. The report was prepared by Arcadis U.S., Inc. and submitted to DEP in accordance with the Land Recycling and Environmental Remediation Standards Act (Act 2), and it constitutes a Remedial Investigation Report and Cleanup Plan as defined in Chapter 3.

The procedures and regulations set forth in Act 2 must be followed in order for your site to qualify for the liability protection provided by the Act. Upon initial review, DEP finds the submission is technically deficient and the following items are needed to complete your submission:

1. The electronic attachments (historical aerial photographs, Sanborn maps, other site-related figures, 1992 RCRA closure report, delineation of fuel oil contaminated site at the former Philadelphia Coke Company site, remedial investigation laboratory analytical reports, photographs of soil sampling intervals) listed in the Table of Contents and referenced in the text of the report were not submitted with the report. 25 Pa. Code Sections 250.408(a), (c), 250.410(a), (b).
2. The above listed attachments were also not made available on the project website for public review. The site is subject to a public involvement plan, and a complete report must be provided for public comment. 25 Pa. Code Section 250.6(c)(1), 35 P.S. Section 6026.304(o).

DEP acknowledges receipt of addendums to the remedial investigation report and cleanup plan, submitted in accordance with Act 2 and received by DEP on October 18, 2021. These addendums included a response to public comments received on October 14, 2021 and the attachments listed above. Act 2 requires National Grid to inform the public of the availability of

the attachments on the website for review and comment. Once the comment period for those materials has closed, you should provide a comment/response addendum to DEP to allow us to complete our review.

Because DEP did not receive a complete report, our review is ongoing, and we may identify additional deficiencies.

Act 2 directs DEP to provide its response regarding its review of a report within 90 days from its receipt of a submission a report. Because you did not submit a complete report until October 18, 2021, DEP has determined your first submission to be technically deficient, as addressed above. To save you time and cost of resubmitting the entire report again, DEP is accepting your submission of additional materials to start its review of your revised submission as of October 18, 2021 and has 90 days from that date to respond to your submission. We look forward to assisting you in the remediation of this property and encourage you to contact us throughout this process. If you have any questions or need further information regarding this matter, please contact Sarah Pantelidou, P.G. by email at spantelido@pa.gov or by telephone at 484.250.5778.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800.654.5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://ehb.courtapps.com> or by contacting the Secretary to the Board at 717.787.3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717.787.3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

Sincerely,

Ragesh R Patel

Ragesh R. Patel
Regional Manager
Environmental Cleanup and Brownfields

cc: Mr. Sheehan, P.E., Arcadis
Mr. Bilash, US EPA Region III
Ms. Rainford, M.P.H., Philadelphia Dept. of Health
Mr. Bram, Esq.
Mr. Brown, P.G.
Ms. Pantelidou, P.G.
Ms. Bass
Re 30 (slp)