



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

January 5, 2022

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John C. Brussel
Principal Engineer/Certified Project Manager
Arcadis U.S., Inc.
One Lincoln Center
110 West Fayette Street, Suite 300
Syracuse, New York 13202

RE: PCB Remediation at the Former Philadelphia Coke Company Facility: Historical Tar Plains/Fill Area, 4501 Richmond Street, Philadelphia, PA; # 2021-61-012

Dear Mr. Brussel:

This letter is in response to Philadelphia Coke Company, Inc.'s (PCC) notification and certification, dated December 1, 2021, provided to the U.S. Environmental Protection Agency Region III (EPA) pursuant to the requirements of the *Self-implementing on-site cleanup and disposal of PCB remediation waste* regulation, 40 C.F.R. § 761.61(a). This notification was submitted by John Brussel, Arcadis U.S., Inc., on behalf of PPC, regarding PPC's plan to conduct on-site disposal of polychlorinated biphenyl (PCB) contaminated soils found in the Historical Tar Plains/Fill Area of the Former Philadelphia Coke Company Facility located at 4501 Richmond Street in Philadelphia, Pennsylvania.

In its notification, PPC has proposed the following PCB cleanup and disposal plan:

- On-site disposal and capping of the soils with PCB concentrations of greater than 1 ppm and less than or equal to 10 ppm in the Historical Tar Plains/Fill Area;
- capping half of the PCB-containing soils with a 6 inch asphalt cap in compliance with § 761.61(a)(7) and capping the other half with an alternate soil cap consisting of 24 inches of compacted soils and a geotextile membrane;
- the recording of deed restriction in compliance with § 761.61(a)(8) noting the existence and required maintenance of the caps; and
- decontamination of all PCB-contaminated movable equipment with an alternate to the self-implementing decontamination procedure found in § 761.79(c)(2).

EPA has reviewed PPC's notifications for the Historical Tar Plains/Fill Area of the Former Philadelphia Coke Company Facility and finds that it is consistent with the requirements of 40 C.F.R.



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*

§ 761.61(a) except for the soil cap. Section 761.61(a)(7) requires the use of a minimum of ten (10) inches of compacted soil meeting the permeability, sieve, liquid limit, and plasticity index parameters in § 761.75(b)(1)(ii) through (b)(1)(v). PPC has proposed the use of soil which does not comply with the parameters in § 761.75(b)(1)(ii) through (b)(1)(v) but PPC will use a minimum of 24 inches of compacted soil underlain with a geotextile membrane to demarcate between the clean and PCB-containing soils. Based on the site specific conditions and low PCB levels in the soil, this alternate soil cap will present no unreasonable risk of injury to health or the environment and is being approved under § 761.61(c).

The self-implementing decontamination procedure for movable equipment set forth at § 761.79(c)(2) requires the swabbing of the surfaces with a solvent and then a double wash/rinse as defined in Subpart S. PPC has proposed using in place of the solvent, an industrial strength detergent or non-ionic surfactant solution (e.g., Alconox Detergent 8, Aqua-Cleen®) applied via high-pressure water spray/steam cleaner and brushing to remove adhered debris. The equipment surfaces will then be triple-rinsed and visually inspected following rinsing. If the visual inspection indicates that waste materials remain, the equipment will be re-cleaned and re-inspected. A field demonstration test will then be conducted for one of each of the individual types of construction equipment that have contact with PCB-containing soils to document that the decontamination method is sufficiently rigorous to reduce PCB concentrations on the equipment surfaces to the high occupancy non-porous cleanup level of less than or equal to 10 µg/100cm² as set forth at § 761.61(a)(4)(ii). The field demonstration test will use the standard PCB wipe test and follow the requirements of Subpart P. Upon the completion of a successful field demonstration for one of each of the individual types of construction equipment contacting PCB-containing soils, the standard PCB wipe test will not be repeated. This alternate decontamination procedure should present no unreasonable risk of injury to health or the environment and EPA is approving this alternate self-implementing decontamination procedure under the provisions of § 761.79(h) with the condition that the field demonstration test results with accompanying lab report and photographic documentation of the field demonstration are provided, via email, to and approved by the EPA Region 3 PCB Coordinator prior to implementation of the alternate decontamination procedure. Decontamination waste and residues shall be disposed of at their existing PCB concentration.

EPA hereby approves the on-site disposal and capping of PCB containing soils found in the Historical Tar Plains/Fill Area of the Former Philadelphia Coke Company Facility located at 4501 Richmond Street, Philadelphia, Pennsylvania, submitted with PPC's notification and certification, dated December 1, 2021. PPC may proceed with its cleanup in accordance with 40 C.F.R. §§ 761.61(a) and (c) and 79(h); its notification and this approval. This approval is subject to the conditions and limitations set forth in 40 C.F.R. § 761.61(a) and 79(h). The approved plan may be modified only in accordance with the procedures described at 40 C.F.R. § 761.61(a)(3)(ii).

EPA notes that within sixty (60) days of completion of the cleanup activities the owner of the property shall submit to the Director of the Land, Chemicals and Redevelopment Division of EPA Region III a copy of the deed restriction and a signed certification, as specified in 40 C.F.R. § 761.61(a)(8)(i)(B). The deed restriction shall indicate that PCB remediation waste at concentrations between 1 and 10 ppm has been left in place, the location of the PCB remediation waste, the existence, location and types of caps, that the caps must be maintained and written EPA permission must be obtained prior to breaching the caps.

EPA's approval of PPC's cleanup plan does not in any way constitute a finding by EPA that the soils in the Historical Tar Plains/Fill Area of the Former Philadelphia Coke Company Facility located at

4501 Richmond Street, Philadelphia, Pennsylvania will be safe or appropriate for any future use, does not insulate the owner of the site from action under any applicable law, and does not relieve PPC of its continuing responsibility to comply fully with 40 C.F.R. Part 761. EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing a PCB cleanup activity subject to 40 C.F.R. § 761.61(a). Among other things, the regulations state that “[c]omplete compliance with 40 C.F.R. § 761.61 does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal,” 40 C.F.R. § 761.50(b)(3)(ii)(B). Further, “[a]ny person storing or disposing of PCBs is also responsible for determining and complying with all other applicable Federal, state, and local laws and regulations,” 40 C.F.R. § 761.50(a)(6).

EPA encourages the compliance with greener cleanup practices for all cleanup projects and recommends adherence to the ASTM Standard Guide to Greener Cleanup E2893-13 (Guide) for work conducted under this approval and the notification. Greener cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. The Greener Cleanup Best Management Practices (BMPs) Process is found in Section 6 of the Guide. See www.astm.org/Standards/E2893.htm for additional information. EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report should include a section on BMP documentation, as described in Section 6.6.5 of the Guide.

EPA is requesting that an electronic copy summarizing the completed cleanup activities, including but not limited to, characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; copies of manifests; copies of certificates of disposal or similar certifications issued by the disposer and total amounts of PCB waste disposed, be submitted within sixty (60) days of completion.

The field demonstration documentation, the completion report and any questions concerning this approval or the self-implementing site cleanup plan review should be directed to Ms. Kelly Bunker, EPA Region III PCB Coordinator, at bunker.kelly@epa.gov or 215-814-2177.

Sincerely,

Dana Aunkst, Director
Land, Chemicals, and Redevelopment Division

cc: Sarah Pantelido, PADEP