

National Grid Former Philadelphia Coke Plant  
Philadelphia, Pennsylvania

Report Additions	Corresponding Report Section
<b>Addressing Comment #1:</b>	
<i>The report lacked a sufficient ecological evaluation for threatened and endangered species identified in the Pennsylvania Natural Diversity Inventory review. 25 Pa. Code Sections 250.402(c), 250.404(a)</i>	
Shoreline habitat and general aquatic species overview	Subsection 6.1.1
Updated conclusions from Pennsylvania Fish and Boat Commission consultation about endangered species	Subsection 6.1.2
Northern red-bellied cooter habitat evaluation	Subsection 6.1.2.1
Atlantic and shortnose sturgeon habitat evaluation	Subsection 6.1.2.2
Best management practices to protect ecological receptors	Subsection 9.6.1.7
BPB's wetland plans	Subsection 9.6.1.5, Exhibit 5
BPB's Phase 1 Aquatic and Nesting Habitat Survey	Exhibit 2
<b>Addressing Comment #2</b>	
<i>The cleanup plan was unclear on how soil material saturated with viscous tar or oil-like material that is disturbed by construction activities will be managed. Such materials must be handled in accordance with DEP's Waste Management regulations. 25 Pa. Code Sections 250.3(a), 250.410(a)</i>	
Soil management details for material saturated with viscous tar or oil-like material	Subsection 9.6.1.2
<b>Addressing Comment #3</b>	
<i>The cleanup plan proposed to cap only areas where exceedances of direct contact medium-specific concentrations were found in the soil characterization. No remedy was proposed and no human health risk assessment was performed for other areas with soil exceedances. 25 Pa. Code Section 250.410(a), 250.405(a)</i>	
Language indicating that any soil exceeding the non-residential direct-contact standards and the soil-to-groundwater MSCs will be covered	Executive Summary, Sections 9.0 & 9.6.1
A description of how the cap will significantly reduce and limit stormwater infiltration	Subsections 9.6.1.0 and 9.6.1.6
Results of a Human Health Risk Assessment (HHRA) for the Railroad Right-of-Way (RR ROW) where existing soil will not be capped	Subsection 9.6.1.4
The RR ROW HHRA	Appendix P
Information about the quality of the January 31, 2006 groundwater sample (e.g., high turbidity)	Subsection 3.2.5.3
Mass flux calculations demonstrating that the PAHs detected in PCMW-09D (from the deep groundwater zone) have no impact to water quality in the Delaware River	Section 4.4
<b>Addressing Comment #4</b>	
<i>The cleanup plan did not detail the locations and extent of the proposed cap. A map depicting the cap area(s) is required. 25 Pa. Code Section 250.410(b)(3)</i>	
New figure showing the extent of capping onsite	Figure 37
Capping details, including transition zones and wetland areas	Subsection 9.6.1.3
Cap transition figure	Exhibit 4
<b>Addressing Comment #5</b>	
<i>No remedy was proposed and no human health risk assessment was performed for potential future excavations beneath the cap. 25 Pa. Code Sections 250.410(a), 250.405(a)</i>	
Language presenting how human health will be protected when performing work beneath caps	Subsection 9.6.1.8
Post-Remediation Care Plan, which includes an HHRA evaluating potential risks for utility workers installing or repairing utilities underneath the soil cap 10 days each year	Exhibit 3
<b>Addressing Comment #6</b>	
<i>The cleanup plan did not include specifications for the proposed vapor barrier to be installed for vapor intrusion mitigation in the new construction. 25 Pa. Code Section 250.410(b)(3)</i>	
Language specifying the proposed vapor barrier product and additional information about the passive sub-slab ventilation system	Subsection 9.8
Minimum specification for the vapor barrier	Appendix Q
Design details for the passive sub-slab ventilation system	Exhibit 8
<b>Addressing Comment #7</b>	
<i>The cleanup plan did not specify the frequency of cap inspections in the Post-Remediation Care Plan. 25 Pa. Section Code 250.410(b)(5)</i>	
Language specifying cap inspection frequency	Subsection 9.9.1
Post-Remediation Care Plan, including cap inspection details	Exhibit 3

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<b>Additional Updates</b>	
Information from the EPA-approved PCB Self-Implementing Cleanup and Disposal Notification (December 17, 2021)	Subsections 3.2.4 & 9.6.1.2, Figure 38, Included as Appendix K
Information on the installation of groundwater monitoring wells during the Initial Remedial Investigation	Subsection 3.1.1.2
Investigation-derived waste documentation from the Supplemental Remedial Investigation	Appendix I
Information about historical characterization of bluish-green stained soil	Subsection 3.2.3.1
A description of the proposed new stormwater outfall and how it will replace the former Outfall 001 structure	Subsection 9.6.1.5, Exhibit 7
A brief overview of the lined temporary stormwater basin and the duration of its use before being converted to the lined permanent stormwater basins	Subsection 9.6.1.6
Well decommissioning plans	Section 9.7 and Table 25
Revisions to address medium-specific concentration (MSCs) updates effective November 20, 2021	Executive Summary; Sections 3.2.4, 3.2.5, 3.2.6, 8.0, and 9.6; Tables 7 through 21; and Figure 18