

Brussel, John

From: Brussel, John
Sent: Wednesday, June 15, 2022 3:41 PM
To: Sarah Pantelidou (spantelido@pa.gov)
Cc: 'rapatel@pa.gov'; 'cdbrown@pa.gov'; 'cbass@pa.gov'; 'Bilash, Kevin'; LeighAnne.Rainford@Phila.gov; 'Cheryl Bettigole'; 'Palak Raval-Nelson'; 'Stearns, Brian M.'; Guerin, Michael; Jim Marshall; Sheehan, Daniel P.; Lesley, Matthew; Healy, Lawrence
Subject: Response to PADEP Act 2 Administrative Deficiency Letter, Philadelphia Coke, Philadelphia (PF ID 831308)
Attachments: 2022.0615-Philly Coke-Ltr Response to PADEP Completeness Review.pdf

Sarah,

On behalf of Philadelphia Coke Co., Inc., National Grid, and BP Bridesburg, please find the attached letter providing the items identified in PADEP's 6/9/22 Completeness Review letter sent to National Grid for the above-referenced site.

Feel free to call Dan Sheehan of Arcadis at 302.884.6919 or me at 315.671.9441 with any questions.

Thank you.

John

John C. Brussel P.E.

Principal Engineer/Certified Project Manager

Arcadis of New York, Inc.

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From: Patel, Ragesh <rapatel@pa.gov>
Sent: Thursday, June 9, 2022 12:08 PM
To: Stearns, Brian M. <Brian.Stearns@nationalgrid.com>; jmarshall@bridgeindustrial.com; daniel.sheehan@arcadis.com
Cc: Brown, C David <cdbrown@pa.gov>; Pantelidou, Sarah <spantelido@pa.gov>; Bass, Charline <cbass@pa.gov>
Subject: [EXTERNAL] Act 2 administrative deficiency letter, Philadelphia Coke, Philadelphia (PF ID 831308)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

Mr. Stearns,

Attached is a completeness review letter for the indicated Act 2 site. DEP is sending this letter electronically and we will not be sending a separate hardcopy letter. DEP requests that you respond to this letter no later than **6/24/2022**.

Ragesh

Ragesh R Patel (he/him/his) | Environmental Program Manager
Department of Environmental Protection | Southeast Regional Office
2 E. Main Street | Norristown, PA 19401
Phone: 484.250.5716 | Fax: 484.250.5961
www.dep.pa.gov

For more information on COVID-19 please visit the PA Department of Health page at <https://www.health.pa.gov/topics/disease/pages/coronavirus.aspx>

For more information on the Southeast Regional Office, please visit www.dep.pa.gov/southeast

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For the registered information on the UK operating companies within the National Grid group please use the attached link: <https://www.nationalgrid.com/group/about-us/corporate-registrations>

Ms. Sarah Pantelidou, PG
Licensed Professional Geologist
Pennsylvania Department of Environmental Protection
Bureau of Environmental Cleanup and Brownfields
2 East Main Street
Norristown, PA 19401

Arcadis U.S., Inc.
1007 N. Orange Street
Suite 411
Wilmington
Delaware 19801
Phone: 302 658 1718
Fax: 302 658 2068
www.arcadis.com

Date: June 15, 2022
Our Ref: 3004026
Subject: RI/CP and RAR Completeness Review
Former Philadelphia Coke Co. Facility
PADEP eFACTS Site ID#609978
4501 Richmond Street
Philadelphia, Philadelphia County, Pennsylvania

Dear Ms. Pantelidou,

On behalf of Philadelphia Coke Co., Inc. (PCC), this letter provides the items identified in the Pennsylvania Department of Environmental Protection's (PADEP's) June 9, 2022 Completeness Review letter sent to National Grid for above-referenced Site. The completeness review was conducted on PCC's May 24, 2022 submittal of the Remedial Investigation Report and Cleanup Plan (RI/CP) Revision 1 and Human Health Risk Assessment (RAR). The items provided with this letter consist of the following:

- **Newspaper Notice for RAR:** A newspaper notice for the RAR (which is contained in Appendix P of the RI/CP) was published in the Philadelphia Daily News on June 13, 2022. A newspaper notice for the RAR is scheduled to be published in the Northeast Times on June 15, 2022. A copy of the notice and proof of publication from the Philadelphia Daily News and Northeast Times are provided in Attachment 1. A newspaper notice for the RI/CP was previously published in both newspapers as identified in the May 24, 2022 cover letter transmitting the RI/CP and RAR to PADEP.
- **Municipality Confirmation of Receipt:** The RI/CP and its appendices (including Appendix P – RAR for the railroad right-of-way), were provided to three individuals at the City of Philadelphia Department of Public Health in the same e-mail correspondence used to send the document to PADEP and the United States Environmental Protection Agency. Confirmation of receipt by the Department of Public Health (Program Administrator of Food Protection and Environmental Engineering) is provided in Attachment 2.

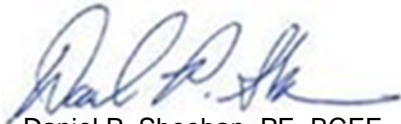
Please note that the RI/CP Revision 1 and its appendices were posted on the project website ([4501 Richmond Street](#)) on May 25, 2022. An updated project Fact Sheet has also been prepared to announce the availability of the revised RI/CP and RAR and the public comment period open through July 15, 2022 (refer to Attachment 3). The updated Fact Sheet has been posted to the project website. It will also be distributed by the local Councilman's office and available at both the Councilman's office and Frankford Library. The comment period close date has been changed from June 30, 2022 (date originally posted on the project website) to July 15, 2022 (as indicated on the updated website and Fact Sheet).

We trust that the information provided with this letter satisfies the administrative requirements of PADEP to begin review of the RI/CP and RAR.

Sarah Pantelidou
Pennsylvania Department of Environmental Protection
June 15, 2022

If you have any questions or concerns, please contact me at 302.884.6919.

Sincerely,
Arcadis U.S., Inc.



Daniel P. Sheehan, PE, BCEE
Principal Engineer

Email: Daniel.Sheehan@arcadis.com

Direct Line: 302.884.6919

CC. C. David Brown, PG, PADEP

Kevin Bilash, USEPA

Leigh-Anne Rainford, Department of Public Health, Environmental Engineering Section, City of Philadelphia

Cheryl Bettigole, MD, MPH, Acting Health Commissioner, City of Philadelphia

Palak Raval-Nelson, PhD, MPH., Director, Environmental Health Services, City of Philadelphia

Brian M. Stearns, PE, National Grid

Mike Guerin, National Grid

Dan Sheehan, PE, Arcadis

Matt Lesley, PG, Arcadis

Jim Marshall, Bridge Industrial

Attachments:

1 – Newspaper Notice and Proof of Publication for the RAR

2 – Municipality Confirmation of RI/CP Revision 1 and RAR Receipt

3 – Update Fact Sheet

Attachment 1

**Newspaper Notice and Proof of Publication for
Risk Assessment Report**

The Philadelphia Inquirer

801 MARKET STREET, SUITE 300, PHILADELPHIA, PA 19107

Affidavit of Publication

On Behalf of:

ARCADIS U S, INC
824 N MARKET ST #820
WILMINGTON, DE 19801

STATE OF PENNSYLVANIA COUNTY OF PHILADELPHIA:

Before the undersigned authority personally appeared the undersigned who, on oath represented a and say: that I am an employee of The Philadelphia Inquirer, LLC, and am authorized to make this affidavit of publication, and being duly sworn, I depose and say:

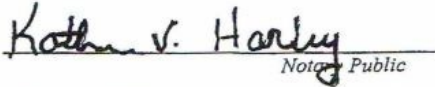
1. The Philadelphia Inquirer, LLC is the publisher of the Philadelphia Daily News, with its headquarters at 801 Market Street, Suite 300, Philadelphia, Pennsylvania 19107.
2. The Philadelphia Daily News is an edition of The Philadelphia Inquirer. The Philadelphia Daily News is continuously published and distributed Sunday-Friday in the City of Philadelphia, count and state aforesaid.
3. The printed notice or publication attached hereto set forth on attached hereto was published in all regular print editions of the Philadelphia Daily News on

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as published in Daily News Legals in the issue(s) of:

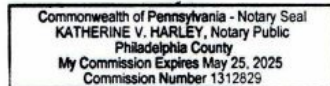
6/13/2022

4. Under oath, I state that the following is true and correct, and that neither I nor The Philadelphia Inquirer, LLC have any interest in the subject matter of the aforesaid notice or advertisement.



Notary Public

My Commission Expires:



Ad No: 107752

Customer No: 112401

COPY OF ADVERTISEMENT

Notification of Receipt of a Plan or Report (for site-specific standard) (Section 304(n)(2)(I))

Notice is hereby given that on behalf of Philadelphia Coke Co., Inc., that a Human Health Risk Assessment (HHRA) has been submitted to the Pennsylvania Department of Environmental Protection, Southeast Regional Office, for the railroad right-of-way (RR ROW) that extends through the eastern portion of the property located at 4501 Richmond Street in Philadelphia, Pennsylvania. The existing ground surface at the RR ROW will be unimproved per an easement that must permit the continuous operation of the Philadelphia Beltway Railroad, although the railroad is currently inactive. The HHRA evaluates potential future exposure of human receptors to constituents of concern identified in the RR ROW and supports the revised Remedial Investigation and Cleanup Plan for the site. The HHRA is a component of the remediation measures proposed to achieve non-residential site-specific cleanup standards established under the Land Recycling and Environmental Remediation Standards Act, the Act of May 19, 1995, P.L., #4, No. 2. This notice is made under the provision of the Act.

Brussel, John

From: Ruth Constantine <rconstantine@bsmphilly.com>
Sent: Monday, June 13, 2022 7:59 AM
To: Healy, Lawrence
Cc: Brussel, John; Sheehan, Daniel P.
Subject: Re: Add'l Legal Ad Request - Northeast Times
Attachments: NM-00496432.pdf

Good Morning ~

Please see the attachment.

It is the proof of your ad or this Wednesday's publications.

Please let me know if this is good to go or if there are any revisions.

I know we have a card on file , would you like for us to use that?

Thanks .

Ruth

On Fri, Jun 10, 2022 at 2:08 PM Healy, Lawrence <Lawrence.Healy@arcadis.com> wrote:

Good to hear! Thank you!

From: Ruth Constantine <rconstantine@bsmphilly.com>
Sent: Friday, June 10, 2022 2:08 PM
To: Healy, Lawrence <Lawrence.Healy@arcadis.com>
Cc: Brussel, John <John.Brussel@arcadis.com>; Sheehan, Daniel P. <Daniel.Sheehan@arcadis.com>
Subject: Re: Add'l Legal Ad Request - Northeast Times

Thank you . I received it.

I will send a proof and an invoice.

This will appear in the Wed, June 15th publication of The Northeast Times.

Thank you and have a wonderful weekend!

Ruth

On Fri, Jun 10, 2022 at 1:31 PM Healy, Lawrence <Lawrence.Healy@arcadis.com> wrote:

Ruth,

I am requesting that the attached legal notice is published in the Northeast Times on behalf of the Philadelphia Coke Co., Inc. I would like the notice to be published in this coming Wednesday's paper, if possible. Please provide me with proof of publication and let me know the cost to publish this notice. Like May, our procurement group will provide prompt payment.

If you have any questions or concerns, please let me know.

Thank you,

Carey

L. Carey Healy

Project Environmental Engineer

Arcadis of New York, Inc.

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**Notification of Receipt
of a Plan or Report (for site-specific standard)
(Section 304(n)(2)(i))**

Notice is hereby given that on behalf of Philadelphia Coke Co., Inc., that a Human Health Risk Assessment (HHRA) has been submitted to the Pennsylvania Department of Environmental Protection, Southeast Regional Office, for the railroad right-of-way (RR ROW) that extends through the eastern portion of the property located at 4501 Richmond Street in Philadelphia, Pennsylvania. The existing ground surface at the RR ROW will be unimproved per an easement that must permit the continuous operation of the Philadelphia Beltway Railroad, although the railroad is currently inactive. The HHRA evaluates potential future exposure of human receptors to constituents of concern identified in the RR ROW and supports the revised Remedial Investigation and Cleanup Plan for the site. The HHRA is a component of the remediation measures proposed to achieve non-residential site-specific cleanup standards established under the Land Recycling and Environmental Remediation Standards Act, the Act of May 19, 1995, P.L., #4, No. 2. This notice is made under the provision of the Act.

Attachment 2

Municipality Confirmation of RI/CP Revision 1 and RAR Receipt

Brussel, John

From: Leigh-Anne Rainford <LeighAnne.Rainford@phila.gov>
Sent: Friday, June 10, 2022 12:01 PM
To: Brussel, John
Cc: Cheryl Bettigole; Palak Raval-Nelson; Stearns, Brian M.; Sheehan, Daniel P.; Healy, Lawrence
Subject: Re: For Review: Revised RI/CP - Philadelphia Coke Co., Inc. Site - 4501 Richmond Street, Philadelphia, PA (eFACTS PF No. 831308)

Good afternoon.

Yes, I received the electronic copy and you do not need to send a hard copy.

Thank you!

Leigh Anne Rainford, MPH
Program Administrator of Food Protection and Environmental Engineering
Environmental Health Services | Philadelphia Department of Public Health
321 University Avenue – 2nd Floor | Philadelphia, PA 19104
Phone: (215) 685 – 7497 | Fax: (215) 382 – 1210
LeighAnne.Rainford@Phila.gov



From: Brussel, John <John.Brussel@arcadis.com>
Sent: Thursday, June 9, 2022 1:19 PM
To: Leigh-Anne Rainford <LeighAnne.Rainford@phila.gov>
Cc: Cheryl Bettigole <Cheryl.Bettigole@Phila.gov>; Palak Raval-Nelson <Palak.Raval-Nelson@phila.gov>; Stearns, Brian M. <Brian.Stearns@nationalgrid.com>; Sheehan, Daniel P. <Daniel.Sheehan@arcadis.com>; Healy, Lawrence <Lawrence.Healy@arcadis.com>
Subject: FW: For Review: Revised RI/CP - Philadelphia Coke Co., Inc. Site - 4501 Richmond Street, Philadelphia, PA (eFACTS PF No. 831308)

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Good Afternoon Leigh Anne,

We wanted to confirm that you received the e-mail below and are able to access the electronic version of the RI/CP for the Philadelphia Coke site. We would be happy to send a hard-copy of the report to your office, if needed.

Feel free to call Dan Sheehan of Arcadis (302.884.6919) or me (315.671.9441) with any questions.

Thank you.

John

From: Brussel, John

Sent: Wednesday, May 25, 2022 1:51 PM

To: Sarah Pantelidou (spantelido@pa.gov) <spantelido@pa.gov>


Cc: cdbrown@pa.gov; Bilash, Kevin <Bilash.Kevin@epa.gov>; LeighAnne.Rainford@Phila.gov; Cheryl Bettigole <Cheryl.Bettigole@Phila.gov>; Palak Raval-Nelson <Palak.Raval-Nelson@phila.gov>; Stearns, Brian M. (Brian.Stearns@nationalgrid.com) <Brian.Stearns@nationalgrid.com>; Guerin, Michael <Michael.Guerin@nationalgrid.com>; Jim Marshall <jmarshall@bridgeindustrial.com>; Sheehan, Daniel P. <Daniel.Sheehan@arcadis.com>; Lesley, Matthew <Matt.Lesley@arcadis.com>; Healy, Lawrence <Lawrence.Healy@arcadis.com>

Subject: For Review: Revised RI/CP - Philadelphia Coke Co., Inc. Site - 4501 Richmond Street, Philadelphia, PA (eFACTS PF No. 831308)

Sarah,

On behalf of Philadelphia Coke Co., Inc., we wanted to let you know that Revision 1 to the Remedial Investigation Report and Cleanup Plan (RI/CP) for the former Philadelphia Coke Plant located in the Bridgesburg borough of Philadelphia, Pennsylvania (the Site) is ready for PADEP and EPA review. The attached PDF file contains the RI/CP cover letter with the following items:

1. PADEP's Transmittal Sheet for Plan/Report Submission and a scan copy of a check payable to the Commonwealth of Pennsylvania for PADEP's review fees.
1. Copies of newspaper notices and proof of publication in the newspapers.
1. A table providing an overview of revisions made to the RI/CP since the initial submittal on July 30, 2021 (intended to facilitate PADEP and public review of the changes).

A PDF version of the updated RI/CP can be downloaded from SharePoint by clicking on the hyperlink here:  [2022.0524-Philly Coke-RI/CP \(FINAL\).pdf](#) (170 MB).

The RI/CP Electronic Attachments are unchanged from the previous submittal, and can be found on the dedicated project website at: <http://4501richmondstreet.com/RI/CPdocs/>.

Hard-copies of the RI/CP are being sent to the designated document repositories (Frankford Library and local Councilman's office) and electronic copies of the RI/CP have already been posted to the project website main page (<http://4501richmondstreet.com>) for convenient public access.

The comment period on the RI/CP will be open through June 30, 2022. A data entry field is provided on the website for the community to provide any comments.

We look forward to any final comments or PADEP/EPA approval of the RI/CP.

Feel free to call Dan Sheehan of Arcadis at 302.884.6919 or me at 315.671.9441 if you have any questions or issues accessing the files.

Thank you.

John

John C. Brussel P.E.

Principal Engineer/Certified Project Manager

Arcadis of New York, Inc.

One Lincoln Center, 110 West Fayette Street, Suite 300 | Syracuse, NY | 13202 | USA

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Attachment 3

Updated Fact Sheet

FACT SHEET

June 15, 2022

Remedial Investigation Report/ Cleanup Plan Revision 1 and Human Health Risk Assessment Submittal

BP Bridesburg LLC (BPB) and National Grid have prepared this fact sheet to announce that Revision 1 to the Remedial Investigation Report and Cleanup Plan (RI/CP) for the property at 4501 Richmond Street has been submitted to the Pennsylvania Department of Environmental Protection (PADEP) and is available for public comment. The RI/CP is supported by a Human Health Risk Assessment (HHRA) for the railroad right-of-way (RR ROW) that extends through the eastern portion of the property.

The above-referenced documents are available online at [4501 Richmond Street](http://www.4501richmondstreet.com) and at the document repositories listed to the right. Comments on the RI/CP and HHRA can be submitted on the above-identified website and as prescribed in the Public Involvement Plan (also available at the Document Repositories). The public comment period will end on July 15, 2022.

Site Location and Regulatory Framework

The property is located in the Bridesburg borough of Philadelphia, Pennsylvania (see figure to the right). As part of BPB's redevelopment of the property for commercial warehousing, it will also be cleaned up under the Pennsylvania's Land Recycling and Environmental Remediation Standards Act of 1995 (Act 2) in cooperation with the Pennsylvania Department of Environmental Protection (PADEP) and the United States Environmental Protection Agency (EPA).

RI/CP Submittal and Revision History

The original version of the RI/CP was submitted in July 2021. PADEP provided comments on the RI/CP in a January 14, 2022 letter. The updated RI/CP (Revision 1) was resubmitted to the PADEP and EPA on May 25, 2022. Revision 1 of the RI/CP addresses PADEP comments and incorporates revisions in response to discussions with the PADEP and the EPA. An overview of RI/CP Revisions, highlighting the changes made to the RI/CP since PADEP receipt of the initial RI/CP on July 30, 2021 is available on the project website and linked here: [Project Overview](#). In general, revisions provide additional details about the proposed remedy and how it will protect human health and the environment. The RI/CP has also been updated to compare the data

Community Input & Dialogue

Questions and comments can be submitted online at: <http://www.4501richmondstreet.com/>

Document Repositories

Frankford Library
4634 Frankford Avenue
Philadelphia, PA 19124-5804
Phone: (215) 685-1473

Local Councilman Office

6730 Torresdale Avenue
Philadelphia, PA 19135
Phone: (215) 686-3444

Site Location Map



with the Pennsylvania medium-specific concentrations (i.e., screening criteria) updated on November 20, 2021. The conclusions of the Remedial Investigation and the proposed cleanup activities are largely unchanged since the original submittal. The site cleanup will be performed in cooperation with PADEP and EPA.



Who to Contact

Comments and questions are always welcome and can be submitted on the website ([4501 Richmond Street](https://www.bridgeindustrial.com/4501-richmond-street)). If you have any questions or wish to request information not available at a document repository, please contact one of the following:

Project Remediation Questions

Mr. Michael E. Guerin
National Grid | Global Finance
Manager, Real Estate Operations
Reservoir Woods, 40 Sylvan Road
Waltham, MA 02451
T: 781.907.1741
michael.guerin@nationalgrid.com

Project Redevelopment Questions

Mr. Jim Marshall
Bridge Industrial
One Gatehall Drive, Suite 201
Parsippany, NJ 07054
T: 862.247.4932
4501richmond@bridgeindustrial.com

If you know someone who would like to be added to the project mailing list, have them sign up on the website or at a Document Repository.