# Brussel, John

From: Brussel, John

**Sent:** Thursday, June 23, 2022 9:55 AM

**To:** Brown, C David

Cc: Patel, Ragesh; Bass, Charline; Pantelidou, Sarah; Stearns, Brian M.; Guerin, Michael; Jim

Marshall; Sheehan, Daniel P.; Lesley, Matthew; Healy, Lawrence

Subject: RE: [External] Response to PADEP Act 2 Administrative Deficiency Letter, Philadelphia

Coke, Philadelphia (PF ID 831308)

**Attachments:** 2022.0623-Philly Coke-Philadelphia DPH HHRA Receipt Confirmation.pdf; Re: HHRA

Receipt Confirmation Requested from Philadelphia DPH - Philadelphia Coke Site,

Philadelphia, PA (PF ID 831308)

### David,

Please find the attached acknowledgement from Leigh-Anne Rainford of the Philadelphia Department of Public Health that she received the Risk Assessment Report for the above-referenced site (same content in PDF and Outlook attachments).

Let us know if you need anything else to close the loop on the completeness review or have any questions once PADEP review of the documents is underway.

Thank you.

John

From: Brown, C David <a href="mailto:cdbrown@pa.gov">cdbrown@pa.gov</a>
Sent: Thursday, June 16, 2022 10:52 AM

To: Brussel, John < John.Brussel@arcadis.com>

**Cc:** Patel, Ragesh <rapatel@pa.gov>; Bass, Charline <cbass@pa.gov>; Pantelidou, Sarah <spantelido@pa.gov>; Stearns, Brian M. <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:** RE: [External] Response to PADEP Act 2 Administrative Deficiency Letter, Philadelphia Coke, Philadelphia (PF ID 831308)

John,

Both of your emails to the city Health Department dated 5/25/2022 and 6/9/2022 (your Attachment 2) do not state that you submitted a risk assessment report for review. It should have been very clear from DEP's 6/9/2022 deficiency letter that your notifications must be inclusive of all submitted reports. Documentation of complete notifications to both the public and municipality have always been required by Act 2.

You still have until 6/24/2022 to resolve the administrative deficiencies.

C. David Brown P.G. | Professional Geologist Manager Environmental Cleanup & Brownfields Program Department of Environmental Protection | Southeast Regional Office 2 East Main Street | Norristown, PA 19401 Phone: 484.250.5792 | Fax: 484.250.5961

www.dep.pa.gov

From: Brussel, John < John.Brussel@arcadis.com>

**Sent:** Wednesday, June 15, 2022 3:41 PM **To:** Pantelidou, Sarah <<u>spantelido@pa.gov</u>>

Cc: Patel, Ragesh < rapatel@pa.gov >; Brown, C David < radbrown@pa.gov >; Bass, Charline < radbrown@pa.gov >; Bilash, Kevin < radbrown@pa.gov >; LeighAnne.Rainford@Phila.gov; Cheryl Bettigole < radbrown@phila.gov >; Palak.Raval-Nelson@phila.gov >; Stearns, Brian M. < radbrown@pa.gov >; Guerin, Michael Charles @phila.gov >; Stearns, Brian M. < radbrown@phila.gov >;

 $<\!\!\underline{Michael.Guerin@nationalgrid.com}\!\!>; Jim Marshall <\!\!\underline{imarshall@bridgeindustrial.com}\!\!>; Sheehan, Daniel P.$ 

<<u>Daniel.Sheehan@arcadis.com</u>>; Lesley, Matthew <<u>Matt.Lesley@arcadis.com</u>>; Healy, Lawrence <<u>Lawrence.Healy@arcadis.com</u>>

**Subject:** [External] Response to PADEP Act 2 Administrative Deficiency Letter, Philadelphia Coke, Philadelphia (PF ID 831308)

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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. One Lincoln Center, 110 West Fayette Street, Suite 300 | Syracuse, NY | 13202 | USA T +1 315 671 9441 | M +1 315 317 8104 www.arcadis.com











Professional Registration / PE-NY, #075208

From: Patel, Ragesh < <a href="mailto:rapatel@pa.gov">rapatel@pa.gov</a> 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 <<u>cdbrown@pa.gov</u>>; Pantelidou, Sarah <<u>spantelido@pa.gov</u>>; Bass, Charline <<u>cbass@pa.gov</u>>

Subject: [EXTERNAL] Act 2 administrative deficiency letter, Philadelphia Coke, Philadelphia (PF ID 831308)

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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 <a href="https://www.health.pa.gov/topics/disease/pages/coronavirus.aspx">https://www.health.pa.gov/topics/disease/pages/coronavirus.aspx</a>

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# Brussel, John

From: Leigh-Anne Rainford <LeighAnne.Rainford@phila.gov>

Sent: Thursday, June 23, 2022 9:24 AM

To: Brussel, John

Cheryl Bettigole; Palak Raval-Nelson; Stearns, Brian M.; Sheehan, Daniel P.; Healy, Cc:

Lawrence; Jim Marshall

**Subject:** Re: HHRA Receipt Confirmation Requested from Philadelphia DPH - Philadelphia Coke

Site, Philadelphia, PA (PF ID 831308)

John,

I confirm the Remedial Investigation Report/Cleanup Plan (RI/CP)-Revision 1 (May 2022) provides the Human Health Risk Assessment (HHRA) Report in Appendix P.

Please let me know if anything else is needed to close the loop.

Best regards,

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 23, 2022 8:29 AM

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>; Jim Marshall <imarshall@bridgeindustrial.com>

Subject: RE: HHRA Receipt Confirmation Requested from Philadelphia DPH - Philadelphia Coke Site, Philadelphia, PA (PF

ID 831308)

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Leigh-Anne,

Thank you for your e-mail response below. Sorry to ask for one more thing... it would be helpful if you could also reply to confirm your understanding that Appendix P of the RI/CP contains a Human Health Risk Assessment (HHRA).

The reply will help close the loop in PADEP's completeness check (they issued a deficiency for not specifically identifying the HHRA as an additional document) and start their review of the RI/CP and HHRA.

Let us know of any questions on the HHRA or any other part of the RI/CP.

Thanks again.

John

From: Leigh-Anne Rainford <LeighAnne.Rainford@phila.gov>

Sent: Thursday, June 23, 2022 7:37 AM

To: Brussel, John < John.Brussel@arcadis.com>

**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:** Re: HHRA Receipt Confirmation Requested from Philadelphia DPH - Philadelphia Coke Site, Philadelphia, PA (PF ID 831308)

Good morning.

Our office received the Remedial Investigation Report and Cleanup Plan (RI/CP) Revision 1 for the former Philadelphia Coke Plant located at 4501 Richmond Street and confirmed receipt of June 10, 2022.

The following items are also provided with the RI/CP submission:

- PADEP Transmittal Sheet for Plan/Report (Transmittal Sheet) submission and \$750 check payable to the Commonwealth of Pennsylvania (\$250 for the RI Report, \$250 for the Cleanup Plan, and \$250 for a Human Health Risk Assessment).
- RI/CP newspaper notice published in the Philadelphia Daily News and Northeast Times, and proof of publication in both newspapers.
- Overview of RI/CP Revisions, highlighting the changes made to the July 30, 2021 RI/CP.

Additionally, here is a timeline of what was received for this site:

| Philadelphia Coke Plant                  | 12/24/2018 | Receipt of NIR   |
|--|------------|--|
| Philadelphia Coke Plant                  | 2/5/2019   | NIR received from PADEP after requesting   |
| Philadelphia Coke Plant                  | 2/6/2019   | PIP Requested (PDPH)   |
| Former Philadelphia Coke Co.<br>Facility | 4/26/2019  | Letter regarding PIP (Arcadis)   |
| Former Philadelphia Coke Co.<br>Facility | 6/14/2021  | PIP (Arcadis)  |
| Former Philadelphia Coke Co.<br>Facility | 7/8/2021   | Plan for Near-Term Public Outreach (Arcadis)   |
| Former Philadelphia Coke Co.<br>Facility | 7/12/2021  | Fact Sheet Re: Remedial Investigation Report /<br>Cleanup Plan and Public Meeting Announced<br>(Arcadis) |
| Former Philadelphia Coke Co.<br>Facility | 8/27/2021  | Receipt of Remedial Investigation Report /<br>Cleanup Plan   |
| Former Philadelphia Coke Co.<br>Facility | 10/13/2021 | Response to Public Comments on Remedial Investigation Report and Cleanup Plan (Arcadis)                  |
| Former Philadelphia Coke Co.<br>Facility | 10/25/2021 | Letter of Technical Deficiency   |
| Former Philadelphia Coke Co.<br>Facility | 1/7/2022   | Remedial Investigation Report and Cleanup Plan<br>Comment / Response Addendum (Arcadis)                  |
| Former Philadelphia Coke Co.<br>Facility | 1/14/2022  | Disapproval of Remedial Investigation Report and<br>Cleanup Plan Report                                  |
| Former Philadelphia Coke Co.<br>Facility | 5/24/2022  | Remedial Investigation Report and Cleanup Plan<br>Revision I (Arcadis)                                   |

I hope this information is helpful. Please let me know if anything else is needed.

# Best regards,

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 < <a href="mailto:John.Brussel@arcadis.com">John.Brussel@arcadis.com</a>>

Sent: Thursday, June 16, 2022 12:07 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. <<u>Brian.Stearns@nationalgrid.com</u>>; Sheehan, Daniel P. <<u>Daniel.Sheehan@arcadis.com</u>>; Healy, Lawrence

<<u>Lawrence.Healy@arcadis.com</u>>

**Subject:** HHRA Receipt Confirmation Requested from Philadelphia DPH - Philadelphia Coke Site, Philadelphia, PA (PF ID

831308)

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Leigh-Anne,

As a follow-up to the voice-mail message that I left on your office phone a few minutes ago and in response to the e-mail below from PADEP, this e-mail is being sent to specifically notify the Philadelphia Department of Public Health of the availability of the Human Health Risk Assessment Report (HHRA) for the railroad right-of-way (ROW) at the Philadelphia Coke site. The HHRA was prepared because the ROW will be unimproved as part of the site cleanup and redevelopment. The HHRA concludes that there are no unacceptable exposure risks to potential receptors from constituents in soil within the ROW.

An overview of the HHRA is provided in Section 9.6.1.4 of the Remedial Investigation Report and Cleanup Plan (RI/CP), which was provided to you electronically on 5/25/22. The full HHRA is included as Appendix P to the RI/CP. Thank you for your 6/10/22 e-mail acknowledgement that you received the RI/CP and do not need a hard copy.

We'd appreciate an e-mail response from you acknowledging that the health department is aware of the HHRA provided with the RI/CP submittal.

Feel free to call Dan Sheehan of Arcadis at 302.884.6919 or me at 315.671.9441 if you have any questions about the HHRA or RI/CP.

Thank you.

John

From: Brown, C David <<u>cdbrown@pa.gov</u>>
Sent: Thursday, June 16, 2022 10:52 AM
To: Brussel, John <John.Brussel@arcadis.com>

Cc: Patel, Ragesh <<u>rapatel@pa.gov</u>>; Bass, Charline <<u>cbass@pa.gov</u>>; Pantelidou, Sarah <<u>spantelido@pa.gov</u>>; Stearns, Brian M. <<u>Brian.Stearns@nationalgrid.com</u>>; Guerin, Michael <<u>Michael.Guerin@nationalgrid.com</u>>; Jim Marshall <<u>imarshall@bridgeindustrial.com</u>>; Sheehan, Daniel P. <<u>Daniel.Sheehan@arcadis.com</u>>; Lesley, Matthew <<u>Matt.Lesley@arcadis.com</u>>; Healy, Lawrence <<u>Lawrence.Healy@arcadis.com</u>>

**Subject:** RE: [External] Response to PADEP Act 2 Administrative Deficiency Letter, Philadelphia Coke, Philadelphia (PF ID 831308)

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inclusive of all submitted reports. Documentation of complete notifications to both the public and municipality have always been required by Act 2.

You still have until 6/24/2022 to resolve the administrative deficiencies.

C. David Brown P.G. | Professional Geologist Manager

Environmental Cleanup & Brownfields Program

Department of Environmental Protection | Southeast Regional Office

2 East Main Street | Norristown, PA 19401 Phone: 484.250.5792 | Fax: 484.250.5961

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From: Brussel, John < John.Brussel@arcadis.com >

**Sent:** Wednesday, June 15, 2022 3:41 PM **To:** Pantelidou, Sarah <spantelido@pa.gov>

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<<u>bilash.kevin@epa.gov</u>>; <u>LeighAnne.Rainford@Phila.gov</u>; Cheryl Bettigole <<u>Cheryl.Bettigole@phila.gov</u>>; Palak.Raval-

 $Nelson < \underline{Palak.Raval-Nelson@phila.gov} > ; Stearns, Brian M. < \underline{Brian.Stearns@nationalgrid.com} > ; Guerin, Michael \\$ 

 $<\!\!\underline{Michael.Guerin@nationalgrid.com}\!\!>; Jim Marshall <\!\!\underline{imarshall@bridgeindustrial.com}\!\!>; Sheehan, Daniel P.$ 

 $<\!\!\underline{\text{Natt.Lesley@arcadis.com}}\!\!>; \text{Lesley, Matthew} <\!\!\underline{\text{Matt.Lesley@arcadis.com}}\!\!>; \text{Healy, Lawrence}$ 

<<u>Lawrence.Healy@arcadis.com</u>>

**Subject:** [External] Response to PADEP Act 2 Administrative Deficiency Letter, Philadelphia Coke, Philadelphia (PF ID 831308)

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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. One Lincoln Center, 110 West Fayette Street, Suite 300 | Syracuse, NY | 13202 | USA T +1 315 671 9441 | M +1 315 317 8104

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Professional Registration / PE-NY, #075208

From: Patel, Ragesh < <a href="mailto:rapatel@pa.gov">rapatel@pa.gov</a>>
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 < <a href="mailto:cdbrown@pa.gov">cbass@pa.gov</a>; Pantelidou, Sarah < <a href="mailto:spantelido@pa.gov">spantelido@pa.gov</a>; Bass, Charline < <a href="mailto:cbass@pa.gov">cbass@pa.gov</a>>

Subject: [EXTERNAL] Act 2 administrative deficiency letter, Philadelphia Coke, Philadelphia (PF ID 831308)

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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 <a href="https://www.health.pa.gov/topics/disease/pages/coronavirus.aspx">https://www.health.pa.gov/topics/disease/pages/coronavirus.aspx</a>

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