

Franklin Slag Pile Superfund Site Proposed Remedial Action Plan Summary Philadelphia, Pennsylvania

EPA Seeks Public Comment on Proposed Cleanup Plan

The U.S. Environmental Protection Agency (EPA) has developed a Proposed Remedial Action Plan (“proposed plan”) for cleaning up the remaining slag at the Franklin Slag Pile Site located in the Port Richmond section of Philadelphia, Pennsylvania.

The plan outlines several options for cleanup, including EPA’s preferred cleanup alternative.

EPA’s preferred cleanup alternative includes:

- A RCRA (Resource Conservation and Recovery Act), multi-layered cap, topped with vegetative soil and seeding;
- Partial excavation and off-site disposal of slag;
- Re-grading the remaining slag pile;
- Fencing;
- Long-term maintenance and monitoring; and
- Five-year reviews.

This fact sheet is a summary of the proposed plan. If you would like to review the “**U.S. EPA Superfund Program Proposed Plan: Franklin Slag Pile**” document in full, it is available online at:

www.epa.gov/arweb

or

[www.epa.gov/reg3hwmd/super/sites/
PASFN0305549/index.htm](http://www.epa.gov/reg3hwmd/super/sites/PASFN0305549/index.htm)

Your Role in the Process

Community involvement is critical to EPA’s decision making process. To make sure the community has a chance to comment on the proposed plan, there is an official 30-day Public Comment Period.

The Public Comment Period regarding the Site’s proposed plan is July 19, 2007 through August 17, 2007.

Comments can be submitted:

- ✓ By postal mail,
- ✓ By e-mail,
- ✓ Or in person at **EPA’s proposed plan public meeting on Wednesday, July 25, 2007, at the St. George Parish Hall, located on the corner of Salmon and Venango Streets, Philadelphia, Pennsylvania 19134.**



Mail comments (postmarked no later than August 17, 2007) to:

**U.S. EPA REGION 3
ATTN: Kristine Matzko, 3HS21
1650 Arch Street
Philadelphia, PA 19103**

Or send comments via email to:
matzko.kristine@epa.gov

Proposed Plan Summary

Various cleanup options were compared and contrasted in an engineering evaluation. Five evaluated options are listed below. **EPA's preferred cleanup option is Alternative 4 (marked in BOLD print).**

- Alternative 1: No Action.

EPA is required by law to consider a "No Action" alternative for every Superfund site for comparison purposes.

- Alternative 2: Limited Action

Alternative 2 would involve:

- ✓ HDPE cover maintenance and complete replacement, if needed;
- ✓ Fencing maintenance;
- ✓ Long-term periodic monitoring and sampling, if needed;
- ✓ Institutional controls; and
- ✓ Five-year reviews.

Alternative 2 relies on long-term maintenance of the cover and fence to limit potential exposure to the slag pile. High density polyethylene (HDPE) is a type of thick, sturdy plastic. Institutional controls (land use restrictions) would be needed to help protect the remedy and prevent exposure to site-related contaminants. Five-year reviews would be necessary, since contamination would be left in place.

- Alternative 3: Complete Removal and Off-Site Disposal

Alternative 3 would involve:

- ✓ Excavation of slag materials and contaminated soils underneath the slag;
- ✓ Transportation and off-site disposal of the contamination to a RCRA-approved landfill;
- ✓ Removal and disposal of the current HDPE cover to a non-hazardous landfill;
- ✓ Fencing, re-grading and re-vegetation of the Site; and
- ✓ Institutional controls.

Alternative 3 would involve the removal of the slag pile. The excavated material would be transported to a Resource Conservation and Recovery Act (RCRA) landfill, where it would be treated to meet RCRA disposal regulations. The slag pile is estimated to contain over 100,000 tons of material that would take about one year of truck traffic to transport. Institutional controls would be set to notify future property owners that the site once contained hazardous materials and was cleaned up to meet industrial re-use standards.

- **Alternative 4: RCRA Cap, Re-Grading and Partial Off-Site Disposal.**

Alternative 4 would involve:

- ✓ Removal and disposal of the current HDPE cover to a non-hazardous material landfill;
- ✓ Grading and partial excavation of the pile to meet RCRA slope requirements;
- ✓ Disposal of the excavated material to a RCRA-approved landfill;
- ✓ Installing a RCRA multi-layer cap (including a clay layer, friction membrane layer, a 24-inch layer of vegetative bearing soil and seeding);
- ✓ Fencing;
- ✓ Long-term maintenance and periodic monitoring and sampling, if needed;
- ✓ Long-term groundwater monitoring;
- ✓ Institutional controls; and
- ✓ Five-year reviews.

Alternative 4 is EPA's preferred cleanup alternative. It would include the removal of the current cover in order to install a RCRA, multi-layer cap. About ten percent of the slag pile material would be removed to meet the slope requirement for the cap. The excavated slag would be disposed of off-site, in a RCRA landfill. The RCRA cap would consist of a non-permeable geosynthetic clay layer, a LLDPE (linear low-density polyethylene) friction membrane, a 24-inch layer of soil, and seeding for vegetation. It would take about one year to implement. Work would also include long-term monitoring and cap maintenance; groundwater monitoring; institutional controls; and five-year reviews.

- Alternative 5: On-Site Treatment and Off-Site Non-Hazardous Waste Disposal.

Alternative 5 would involve:

- ✓ Removal and disposal of the current HDPE cover to a non-hazardous landfill;
- ✓ Excavation and on-site treatment of slag material and contaminated soils;
- ✓ Truck transportation of treated materials;
- ✓ Disposal of treated materials at a non-hazardous waste landfill;
- ✓ Re-grading and vegetation of the site;
- ✓ Institutional controls; and
- ✓ Fencing.

Alternative 5 would treat the slag pile material on-site to meet Toxicity Characteristic Leaching Procedure (TCLP) criteria before it could be transported and properly disposed of in a non-hazardous waste landfill. Testing would need to be performed to determine what stabilizing agent would be most effective for the lead content in the slag. Institutional controls would be set to notify future property owners that the site once contained hazardous materials and was cleaned up to meet industrial re-use standards.

For More Information

If you would like to review the proposed plan in full, read Site background information or review other site-related documents, please visit our website at:

www.epa.gov/reg3hwmd/super/sites/PASF_N0305549/index.htm

or

www.epa.gov/arweb



Or to review the Administrative Record in person, call for an appointment with:

Anna Butch, (215) 814-3157
U.S. EPA Region 3
Administrative Records Room
 1650 Arch Street
 Philadelphia, PA 19103

Information is also available at:
Free Library of Philadelphia
Port Richmond Branch
 2987 Almond Street
 (Indiana Ave. and Almond St.)
 Philadelphia, PA 19134

EPA's Nine Criteria Analysis

Before EPA chooses a final cleanup method, the alternatives are evaluated using nine criteria to make sure that EPA is selecting the best cleanup. The nine criteria are:

1. Overall Protection of Human Health and the Environment
2. Compliance with Applicable or Relevant and Appropriate Requirements
3. Long-term Effectiveness
4. Reduction of Toxicity, Mobility, or Volume through Treatment
5. Short-term Effectiveness
6. Implementability
7. Cost
8. State Acceptance
9. Community Acceptance



Based on the information available to date, using the criteria listed above, EPA suggests Alternative 4 as the preferred cleanup option because it will:

- ❖ Be protective of human health and the environment;
- ❖ Comply with state and federal laws;
- ❖ Be efficient and cost-effective; and
- ❖ Provide permanent solutions.

At this point, EPA has only fully evaluated the first seven of the nine criteria for each cleanup alternative. Only after considering input from state officials and the community regarding the proposed plan, will EPA make a final cleanup decision. EPA's preferred alternative could change in response to new information and/or public comment.

Please submit any comments on EPA's proposed plan by August 17, 2007.

Franklin Slag Pile Superfund Site Proposed Plan Summary



U.S. Environmental Protection Agency Region 3
Attn: Trish Taylor
1650 Arch Street (3HS52)
Philadelphia, PA 19103

Next Steps

After the public comment period has ended and comments have been reviewed and carefully considered, EPA will choose the cleanup option for the Site. The cleanup option will be described in a Record of Decision (ROD). EPA's responses to submitted comments will be recorded in a document called the Responsiveness Summary (RS), which will be part of the ROD document.

If you have questions about the Franklin Slag Pile Site, please contact: Trish Taylor, EPA Community Involvement Coordinator, at (215) 814-5539, or taylor.trish@epa.gov.



EPA Public Meeting

EPA will hold a public meeting to discuss the proposed plan, the cleanup alternatives evaluated, and EPA's preferred cleanup option. Comments on EPA's proposed plan can be submitted during the public meeting, which will be held on:

Wednesday, July 25, 2007

6:30 p.m. until 8:30 p.m.

**St. George Parish Hall,
Salmon Street and
Venango Street,
Philadelphia, PA 19134**