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Date: June 14, 2021
Our Ref: 30004026
Subject: Former Philadelphia Coke Co. Facility
PADEP eFACTS Site ID#609978
4501 Richmond Street
Philadelphia, Philadelphia County, Pennsylvania

Dear Ms. Rainford,

On behalf of Philadelphia Coke Co., Inc. (PCC), please find the attached Public Involvement Plan (PIP) for the former Philadelphia Coke Plant located in the Bridesburg borough of Philadelphia, Pennsylvania (the Site). The PIP was prepared in response to a February 6, 2019 letter from the City of Philadelphia (the City) acknowledging receipt of the Notice of Intent to Remediate (NIR) and requesting (through the provisions of Act 2) that a PIP be developed for the Site and a public meeting be held for interested parties (e.g., affected community and businesses). The PIP was prepared in accordance with the latest updates to Pennsylvania's Land Recycling and Environmental Remediation Standards Act of 1995 (Act 2), Chapter 250, Administration of the Land Recycling Program (25 PA Code §250) and Pennsylvania Department of Environmental Protection's (PADEP's) Technical Guidance Manual. Per 25 PA Code §250.6(d)(1), the PIP defines procedures for community engagement and the communication of findings from ongoing Site investigation and remediation activities. The document repositories for the Site are identified in the PIP, but the public meeting details are yet to be determined.

PCC will host a public meeting of interested parties (e.g., community and local businesses) to discuss the site conditions and the Cleanup Plan. At least 30 days before the public meeting, the community will be provided advance notice of the meeting, during which time the RI Report and Cleanup Plan (containing relevant background and sampling information) will be available to the public at the document repositories. Meeting materials will be provided to PADEP and the City.

As requested, we will notify the Department of Health of the meeting date, time, and location when it has been determined.

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

Ms. Leigh Anne Rainford
City of Philadelphia
June 14, 2021

Email: daniel.sheehan@arcadis.com
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CC: Cheryl Bettigole, MD, MPH, Acting Health Commissioner, City of Philadelphia
Palak Raval-Nelson, PhD, MPH., Director, Environmental Health Services, City of Philadelphia
C. David Brown, PG, PADEP
Sarah Pantelidou, PG, PADEP
Kevin Bilash, USEPA
Brian M. Stearns, PE, National Grid
John C. Brussel, PE, Arcadis

Enclosures:
Public Involvement Plan

Philadelphia Coke Co., Inc.

PUBLIC INVOLVEMENT PLAN

Former Philadelphia Coke Plant

Philadelphia, Pennsylvania

PADEP eFACTS Site ID #833593

& Facilities ID #609978

EPA ID #PAD000427906

June 2021

A large orange geometric shape, consisting of a triangle and a rectangle, is positioned in the bottom right corner of the page. A thin white line runs horizontally across the page, intersecting the orange shape.

PUBLIC INVOLVEMENT PLAN

Former Philadelphia Coke Plant
Philadelphia, Pennsylvania
PADEP eFACTS Site ID #833593 &
Facilities ID #609978
EPA ID #PAD000427906



Michael Guerin
Philadelphia Coke Co., Inc. / National Grid USA

Prepared for:
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Jim Marshall
BP Bridesburg LLC Senior Director

Our Ref.:
3004026

Date:
June 2021



Daniel P. Sheehan, P.E.
Arcadis U.S., Inc. Principal-in-Charge

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ACRONYMS AND ABBREVIATIONS

BPB	BP Bridesburg LLC
COVID	Coronavirus Disease
DPH	Philadelphia Department of Public Health
EPA	United States Environmental Protection Agency
HWMU	Hazardous Waste Management Units
NIR	Notice of Intent to Remediate
PADEP	Pennsylvania Department of Environmental Protection
PCC	Philadelphia Coke Co., Inc.
PIP	Public Involvement Plan
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
SWMU	Solid Waste Management Units
UST	underground storage tanks

1 INTRODUCTION

On behalf of Philadelphia Coke Co., Inc. (PCC), Arcadis U.S., Inc. (Arcadis) has prepared this Public Involvement Plan (PIP) for the former Philadelphia Coke Plant located in the Bridesburg borough of Philadelphia, Pennsylvania (the Site). BP Bridesburg LLC (BPB) is currently in negotiations with PCC to purchase and redevelop the Site. As part of the redevelopment, the Site will be remediated under the Pennsylvania Department of Environmental Protection (PADEP) Land Recycling and Environmental Remediation Standards Act of 1995 (Act 2). The purpose of the PIP is to define procedures for community engagement and the communication of findings from ongoing Site investigation and remediation activities. In accordance with Act 2, the local municipality can request to be involved in the development of the remediation and reuse plans for a site being remediated. The PIP establishes the framework for educating interested parties about past and ongoing Site environmental remediation efforts and enables two-way communication between the public and PCC/BPB. The PIP is a living document to be modified as needed based on community feedback, remediation findings, and Site development work.

This PIP was prepared with consideration for the community's demographics and environmental challenges such that all residents and community members will be able to readily access information, ask questions to the remediation and redevelopment teams, and provide meaningful input, if desired. In doing so, PCC and BPB have reached out to community leaders and used relevant information provided in the United States Environmental Protection Agency's (EPA's) environmental justice screening tool found online at <https://www.epa.gov/ejscreen>.

This PIP has been prepared in response to a February 6, 2019 letter from the City of Philadelphia (the City) acknowledging receipt of the Notice of Intent to Remediate (NIR) and requesting (through the provisions of Act 2) that a PIP be developed for the Site and a public meeting be held for interested parties (e.g., affected community and businesses). Arcadis sent an April 26, 2019 letter to the City on behalf of PCC indicating that a PIP will be developed for the Site and a public meeting will be hosted by PCC. This PIP will be submitted to PADEP and the EPA with the site Cleanup Plan.

1.1 Regulatory Framework

This PIP has been prepared to guide the collection of information and data necessary to enhance public awareness of the Site under Pennsylvania's Land Recycling Program Technical Guidance Manual updated on January 19, 2019 (Section II.A.3(c)), the Land Recycling and Environmental Remediation Standards Act (Act 2; Section 250.6), and its enabling regulations, 25 PA Code, Chapter 250.

As stated by the regulations, the requirements of the PIP are as follows:

- Provide public access to project documents at convenient locations.
- Designate a central point of contact to address questions from the community.
- Identify a location for public hearings and meetings near the Site.

1.2 Comment Involvement Objectives

This PIP is intended to facilitate public involvement for the environmental investigation, characterization, and remediation of the Site and will serve as a guideline in communicating overall progress and developments in the remediation. Finally, it will serve to inform and promote effective communication among the community, PCC, BPB, PADEP, EPA, Philadelphia Department of Public Health (DPH), and other Philadelphia Departments and elected officials. This PIP includes future outreach measures that will be conducted as the project progresses.

The purposes of the PIP will be to meet community concerns as they arise. In this way, the PIP will be a dynamic document to address an evolving situation. The PIP provides a flexible framework for conducting the community involvement and information exchange program. The framework allows for modifications based on future suggestions from community members and changes in the remediation efforts.

Communication between PCC/BPB and the community will incorporate the best strategies of two-way exchange between PCC/BPB and all stakeholders. "Stakeholders" in this context refers to community residents, interested or involved agencies, local businesses, PADEP, EPA, Philadelphia DPH, and environmental organizations.

Types of communication that will enable such dialogue may include:

- Posting of relevant documents on a website and, if feasible with COVID restrictions, establish a document depository for hard copy documents at a convenient location.
- Public meeting(s) to inform the public of remedial findings and the cleanup plan.
- Fact sheets at various milestones in the project.

1.3 Site Background

The Site is located at 4501 Richmond Street between Orthodox Street and Buckius Street as shown on Figure 1. The Site is approximately 63 acres in size and is currently unoccupied.

The Site was used as a manufactured gas plant in the mid-1920s and coking facility from 1929 to 1982. Coal and Coke Storage Areas were located in the northern portion of the Site. The main Coking Operations Area was located in the center of the Site and consisted of the coke ovens, a byproducts building, tar storage, and oxide boxes. The Site also included an iron oxide waste area and tar plains. A fuel oil blending facility operated on the eastern 2.5 acres of the Site from approximately 1969 through 1989. The Fuel Blending Area consisted mainly of aboveground storage tanks and below ground piping. All former structures at the Site have been demolished to ground level, and the Site is currently vacant.

Resource Conservation and Recovery Act (RCRA) closure actions were conducted at the Site from 1988 to 1993 to address source area contamination located at specific RCRA Hazardous Waste Management Units (HWMUs) and Solid Waste Management Units (SWMUs). The Certificate of Completion for RCRA Site Closure was issued by United States Environmental Protection Agency (EPA) on December 28, 1994 (WCC 1994). The requirements of the Site Closure Plan were fully implemented. Any additional requirements that remain will be fulfilled under PADEP Act 2.

PUBLIC INVOLVEMENT PLAN

In addition to the above RCRA Site Closure activities, separate cleanup activities were initiated in 1992 to address oily residues encountered in the Fuel Blending Area. The above-grade Fuel Blending Area facilities were dismantled and removed in early 1998.

Lastly, seven underground storage tanks (USTs) were removed from the Site in 1992. The UST closures were approved in June 1992 by the agency preceding PADEP. Each UST excavation was backfilled with clean fill.

The Site has not been occupied since the conclusion of the RCRA Site Closure. Other than Site investigations, no other activities or operations besides routine mowing and perimeter chain-link fence maintenance have been conducted since the RCRA Closure was certified in 1994.

In 2013, EPA-certified Environmental Indicator Forms were completed that indicated that both human exposures and impacted groundwater migration are under control at the Site. Any further work needed will be performed to satisfy the requirements of PADEP Act 2.

2 SITE INVESTIGATION SUMMARY

A multi-phase Remedial Investigation (RI) was undertaken to assess the nature and extent of Site-related environmental impacts and evaluate the risks posed to human health and the environment by those impacts. The RI was performed in two major phases: (1) the Initial RI from 2003 through 2006; and (2) the Supplemental RI from 2018 and 2019. As part of the RI, soil, soil gas, and groundwater investigations were performed to characterize remaining residuals. The existing Site layout and RI sampling locations are shown on Figure 2. Taken together, the RI results indicate the presence of residual impacts that are stable and limited to defined areas within the Site boundaries. Details of the RI activities and findings are provided in the Remedial Investigation Report/Cleanup Plan, which will be available on the website and/or in the document repository.

Based on current condition and existing Site-security measures (e.g., a perimeter fence), there are no currently complete human health exposure pathways. Potential future exposure pathways will be eliminated through engineering and institutional controls as discussed in Section 3.0 below and the Cleanup Plan.

3 PROPOSED CLEANUP ACTIVITIES AND COMMUNITY PROTECTION MEASURES

The current and future exposure pathways will be mitigated primarily via a “pathway-elimination” approach pursuant to an Act 2 Site-Specific Standard through a combination of engineering and institutional controls. Potential engineering controls proposed for the Site may include capping impacted soils with asphalt pavement, concrete, and building structures and/or placement of clean soil to prevent direct contact exposure for workers and visitors. Proposed institutional controls are likely to include, among other things, use of a deed restriction/environmental covenant prohibiting: (1) residential use; (2) Site groundwater use; and (3) disturbance of capped impacted soils without following the procedures of a Post-Remediation Care Plan.

This selected remedy will:

- Significantly reduce the risk of exposure following installation of the remedy.
- Significantly reduce the potential exposure to human and ecological receptors.
- Be accomplished in a reasonable period of time at a realistic cost.

PCC and BPB will implement the Site cleanup with consideration for EPA’s environmental justice initiative. Per this initiative, EPA is committed to the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income.

4 PUBLIC INVOLVEMENT COMPONENTS

The PIP identifies the tools that will be used to promote greater public participation and awareness of the design and implementation of remediation efforts. This PIP will be updated during changing phases in the project or to incorporate additional information, as appropriate. The Philadelphia DPH will be notified in writing of the date, time, and location of any public meetings and the location of the document repository(ies).

The Site's PIP implementation requirements per the request of Philadelphia DPH and per 25 PA Code §250.1-250.6 (as revised January 7, 2012), are as follows:

1. Establishing Document Repositories.
2. Designating a Central Point of Contact.
3. Holding public meetings at location(s) near the Site.
4. Providing Periodic Updates to the Community: As part of PCC's commitment to public involvement, PCC will host public meeting(s) as needed and provide fact sheet(s) to ensure community awareness of activities at the Site.

The following subsections detail each of these requirements.

4.1 Establishing Document Repositories

A hardcopy of Site environmental reports and documents that have been submitted to PADEP will be located at the following addresses:

- Frankford Library at 4634 Frankford Avenue, Philadelphia, Pennsylvania 19124-5804 (telephone 215.685.1473). Depending on COVID restrictions, interested parties can make an appointment with the library to view environmental reports in-person.
- Office of Councilman Bobby Henon at 6730 Torresdale Avenue, Philadelphia, Pennsylvania 19135- (telephone 215.686.3444). The office is open from Monday to Friday from 8 am to 4 pm and by appointment.

Because of the COVID pandemic, PCC will also provide the documents in a publicly-available online repository that can be found via the link: <http://4501richmondstreet.com>. The document repositories will consist of:

- Documents submitted to PADEP, including the RI Report, Cleanup Plan, Risk Assessment Report, Final Report, and any Addenda to these reports, if developed.
- A sign-up sheet to receive more information.
- Fact sheets.
- Schedule and locations of upcoming public meetings.

Parties interested in learning more about the Site may join a mailing list by completing the "Former Philadelphia Coke Plant Information Sign-Up Sheet" (Appendix A). Participants on the mailing list will

PUBLIC INVOLVEMENT PLAN

receive information, such as, periodic fact sheets, document submittal/upload notifications, and information on upcoming public meetings. The Sign-up sheet for the mailing list will be available at the Frankford Library and online. Interested parties must have an e-mail and/or a mailing address to receive Site updates. Additionally, the library will document each interested party in the “Former Philadelphia Coke Plant Information Sign-Up Sheet” (Appendix A).

PCC will also supply the library with previously-compiled environmental reports and documents related to the Site if requested by the City, within five (5) business days of the City’s request. The City’s request may be verbal or written.

4.2 Project Roles and Responsibilities

This section provides information on the roles and responsibilities for PCC as well as for the potential buyer BPB involved in the remediation project at the Site.

PCC is the current Site owner and has a Purchase and Sale Agreement with BPB outlining the intent to sell the property. BPB is negotiating with PCC to purchase the property for redevelopment. BPB’s current plan is to develop the Site for non-residential use, as currently allowed by zoning. Site cleanup will be integrated with the Site development.

Faegre Drinker Biddle & Reath LLP and Arcadis are supporting PCC in managing the environmental and remedial components of the property sale. Faegre Drinker Biddle & Reath LLP is providing regulatory compliance, transactional, and legal support. Arcadis is providing engineering and technical support,

4.2.1 Primary Contact

The primary point of contact for Site remediation will be Mr. Michael E. Guerin of National Grid on behalf of PCC. Mr. Guerin led discussions for National Grid with the prospective buyer of this Site, BPB, related to conducting the property transaction. Mr. Guerin will be supported by the proposed alternate contact, Mr. Jim Marshall, a Senior Director of Bridge Industrial, which is an affiliate of BPB. Mr. Marshall is responsible for planning and implementing the Site redevelopment as BPB becomes the new owner.

Contact information for both Mr. Guerin and Mr. Marshall is below:

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

Mr. Jim Marshall
Bridge Development Partners, LLC
One Gatehall Drive, Suite 201
Parsippany, NJ 07054
T: 862.247.4932

jmarshall@bridgeindustrial.com

4.2.2 Other Site Contacts

A list of contacts that are supporting the remediation and redevelopment of this property are provided in Table 4-1 below:

Table 4-1: Site Contacts

Name/Affiliation	Role	Contact Information
PADEP		
Ms. Sarah Pantelidou, P.G. Licensed Professional Geologist	PADEP Case Manager	T: 484.250.5778 spantelido@state.pa.us
EPA		
Mr. Kevin Bilash, P.E. Environmental Engineer	EPA Case Manager	T: 215.814.2796 bilash.kevin@epa.gov
Arcadis U.S., Inc. – Project Consultant		
Daniel P. Sheehan, P.E. Principal in Charge	Environmental Remediation Technical Lead	T: 302.884.6919 daniel.sheehan@arcadis.com

4.3 Public Meetings

PCC will conduct a public meeting prior to PADEP approval of the RI Report and Cleanup Plan. The venue for the public meetings will be appropriately publicized and held at a suitable location and time (or held virtually, depending on COVID restrictions), allowing interested parties to attend. At this time, the meeting space in the Frankford Library at 4634 Frankford Avenue, Philadelphia, Pennsylvania 19124-5804 is tentatively identified as a likely meeting location. This location offers audio and visual equipment. Relevant sampling and background investigation material will be publicly available approximately 30-days prior to the public meeting at the document repositories.

Arcadis, on behalf of PCC, will post a notice in the local newspaper (The Philadelphia Daily News or The Philadelphia Inquirer) advertising the date, time, and place of any public meeting at least 30 days before the event. In addition, Arcadis will notify the Philadelphia DPH and stakeholders of the date, time, and location of the public meeting. In addition, anyone that completed the “Former Philadelphia Coke Plant Information Sign-Up Sheet” will be notified of the meeting by the mailing address and/or e-mail that they identified on the form. All attendees of the meeting will be asked to complete the “Former Philadelphia Coke Plant Information Sign-Up Sheet”, providing a name, address, contact information and contact preference (i.e., mailing, electronic mailing or phone).

The purpose of a public meeting is to educate the community about the Site, engage stakeholders, allow participation, and to provide a means for the public to contribute to the overall remediation and

PUBLIC INVOLVEMENT PLAN

development. The goal is to develop partnerships between agencies and community groups, provide an open microphone for questions, and solicit feedback. The first public meeting will focus on the following:

- Identifying the location and extent of Site residuals remaining at the Site, based on the multi-phase RI.
- Explaining any existing exposure pathways to constituents of potential concern and the health risks potentially associated with those constituents.
- Discussing the measures that will be taken to protect the community, workers, and recreation areas from possible exposure during remediation and Site redevelopment.
- Describing the remediation methodologies to be employed.

The structure for these meetings will include a technical overview of the Site work. Project team members from PADEP, EPA, and representatives from the City (e.g., DPH) will be invited. A presentation on the Site updates and Act 2 status will be prepared, including tables and figures, for use in the meeting. Engagement will be encouraged during these meetings, and the meetings will provide enough time for an open dialogue with technical experts. Meeting minutes will be recorded and publicly available at the document repository, once finalized. The meeting minutes will include the presentation of materials, attendance list, and questions. As a standalone document, question responses will be provided to the document repositories, PADEP, and the City.

4.4 Fact Sheets

A fact sheet will be included in public meeting notices. Fact sheets will also be available in the document repository and as handouts at public meetings. The fact sheets provide general information regarding the project activities and contact information for those people having additional questions.

4.5 Living Document and Public Involvement Program

As mentioned above, this document will be a living document that will be reviewed and updated, as applicable, every 3 years. It will also be updated during changing phases in the project, to incorporate additional information, including feedback from regulatory and public stakeholders.

5 REFERENCES

Arcadis. 2018. *Notice of Intent to Remediate Under Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2)*. November 5, 2018 Letter to City of Philadelphia.

Arcadis, 2021. *Remedial Investigation Report and Cleanup Plan*, prepared for the Philadelphia Coke Co. Inc. May 2021.

Baker, 2012. *Environmental Indicator Inspection Report for Philadelphia Coke Co., Inc.* prepared for the United States Environmental Protection Agency, Region III, Corrective Action Program. January 2012.

City of Philadelphia. 2019. Letter to Arcadis. February 6, 2019.

EPA, 2013. Documentation of Environmental Indicator Determination; RCRA Corrective Action; Environmental Indicator (EI) RCRIS code (CA725); Current Human Exposures Under Control. Certified on April 10, 2013. https://www.epa.gov/sites/production/files/2016-01/documents/hh_pad000427906.pdf

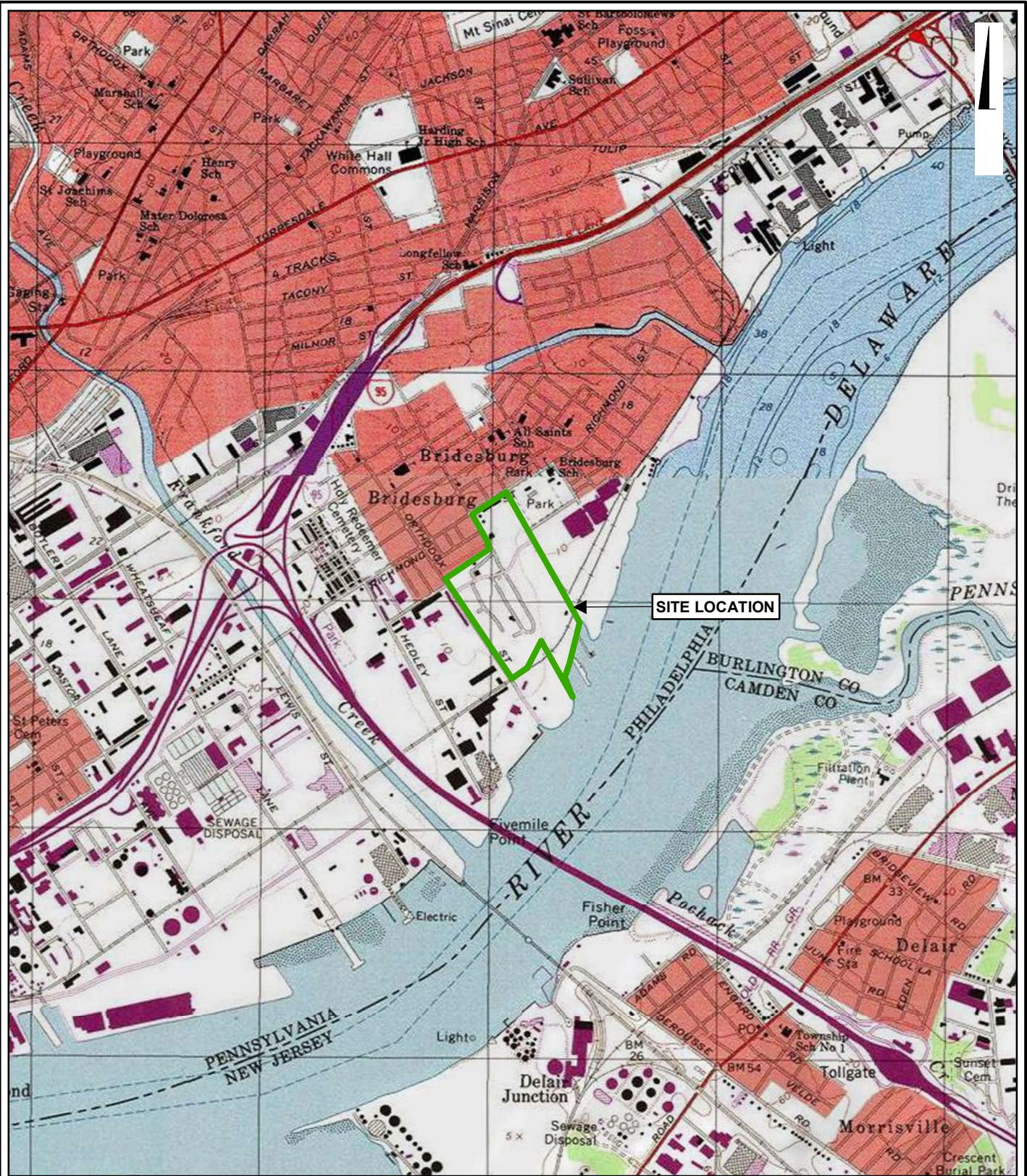
EPA, 2013. Documentation of Environmental Indicator Determination; RCRA Corrective Action; Environmental Indicator (EI) RCRIS code (CA750); Migration of Contaminated Groundwater Under Control. Certified on April 10, 2013. https://www.epa.gov/sites/production/files/2016-01/documents/gw_pad000427906.pdf

PADEP, 2002. *Land Recycling Program Technical Guidance Manual*. Department of Environmental Protection, Bureau of Environmental Cleanup and Brownfields, Last Updated on January 19, 2019.

WCC, 1994. *Professional Engineer Certification of Closure*, December 28, 1994.

FIGURES

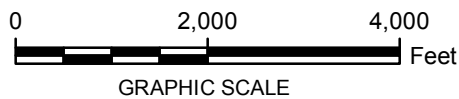




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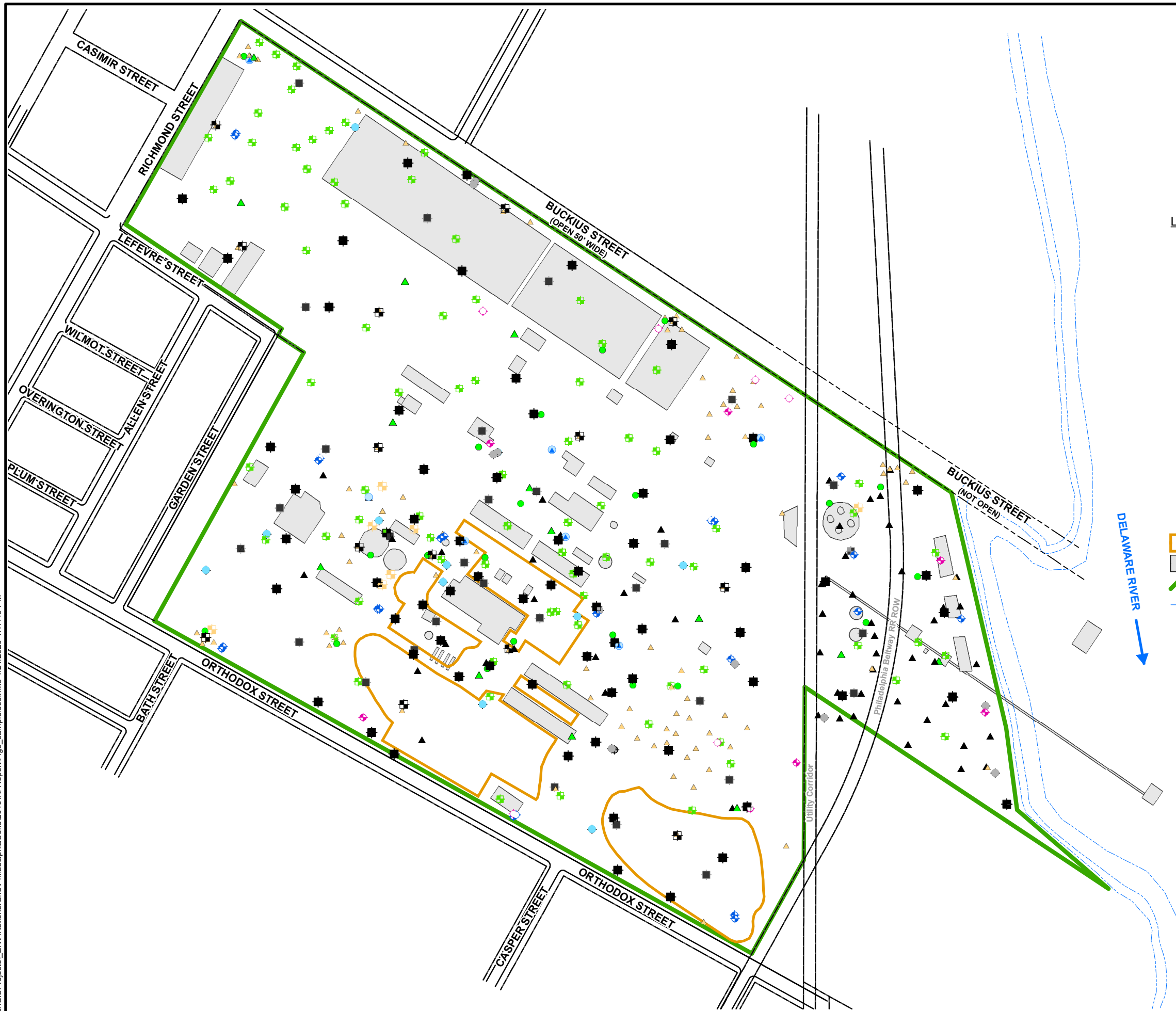
1. USGS TOPOGRAPHIC MAP PROVIDED BY ESRI.



NATIONAL GRID
 FORMER PHILADELPHIA COKE PLANT
 PHILADELPHIA, PENNSYLVANIA
 PUBLIC INVOLVEMENT PLAN

SITE LOCATION MAP





LEGEND:

- ▲ (S-101) ARCADIS SOIL BORING LOCATION (2019)
- ⊕ (S-120) ARCADIS TEST PIT LOCATION (2019)
- ▲ (PCSB-04) PSS ENVIRONMENTAL SOIL BORINGS (2005)
- (PCHP-03) PSS ENVIRONMENTAL HYDROPUNCHES (2005)
- ⊕ (PCTP-01) PSS ENVIRONMENTAL TEST PITS (2005)
- (PSSTP-23) PSS ENVIRONMENTAL TEST PITS (2003)
- ⊕ (TP-46) EEI GEOTECHNICAL TEST PITS (2005)
- ◆ (MW-101) ARCADIS GROUNDWATER MONITORING WELL LOCATION (2018-2019)
- ◆ (PCMW-12S) PSS ENVIRONMENTAL GROUNDWATER MONITORING WELLS (2005)
- ◆ MISSING/DESTROYED PSS ENVIRONMENTAL GROUNDWATER MONITORING WELLS
- ◆ (MW-05) RCRA CLOSURE GROUNDWATER MONITORING WELL (1992 AND EARLIER)
- ▲ (PC-B6) EEI GEOTECHNICAL SOIL BORINGS (2005)
- (PCSV-20) PSS SOIL VAPOR SAMPLING LOCATIONS (2006)
- ▭ RCRA EXCAVATION
- ▭ FORMER STRUCTURE/OPERATION
- SITE BOUNDARY
- SHORELINE

NOTE:

1. BASE MAP OBTAINED FROM FIGURE PREPARED BY PAULUS SOKOLOSKI AND SARTOR ENGINEERING, PC, TITLED "GENERAL SITE PLAN", DRAWING 2A, DATED APRIL 9, 2007 AT A SCALE OF 1"=250'.



NATIONAL GRID FORMER PHILADELPHIA COKE PLANT PHILADELPHIA, PENNSYLVANIA PUBLIC INVOLVEMENT PLAN	
SITE LAYOUT AND RI SAMPLING LOCATIONS	
ARCADIS	Design & Consultancy for natural and built assets
FIGURE 2	

APPENDIX A

Former Philadelphia Coke Plant Information Sign-Up Sheet



Appendix A
Former Philadelphia Coke Plant Information Sign-Up Sheet

Remedial Investigation Report
National Grid Former Philadelphia Coke Plant
Philadelphia, Pennsylvania

Date	Name(s)	Address	E-mail Address	Phone Number	Contact Preference (phone, mail, e-mail)
1					
2					
3					
4					
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19					
20					
21					
22					

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A decorative graphic consisting of three thin orange lines. One line is horizontal, extending across the bottom of the page. Two other lines are diagonal, starting from the bottom left and extending towards the top right, crossing the horizontal line.