

**From:** [Foster, Crystal](#)  
**To:** [Leigh-Anne Rainford](#); [Brunt, Larry](#)  
**Cc:** [Brown, C David](#); [Strobridge, Lisa](#); [India McGhee](#); [Jane Hwang](#); [Aurora Trainor](#); [Dawn Kiesewetter](#); [Anthony Reitano](#); [Eric Carlson](#); [Max Ryan](#)  
**Subject:** [External] RE: PIP Request-1646 S. 51st Street  
**Date:** Tuesday, January 21, 2025 7:11:45 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[Public Involvement Plan - Alliance 51St Street 01-21-2025.pdf](#)

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Good day, Leigh-Anne,

Attached is the revised Public Involvement Plan for this site. Thank you!

**Crystal L. Foster**

Senior Geologist  
Arcadis U.S., Inc.  
2100 Georgetown Drive | Suite 402 | Sewickley, PA | 15143 | USA  
T +1 724 934 9529  
M +1 412 527 2575  
[www.arcadis.com](http://www.arcadis.com)

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**From:** Leigh-Anne Rainford <LeighAnne.Rainford@phila.gov>  
**Sent:** Wednesday, January 8, 2025 1:36 PM  
**To:** Foster, Crystal <Crystal.Foster@arcadis.com>; Brunt, Larry <Larry.Brunt@arcadis.com>  
**Cc:** cdbrown@pa.gov; Strobridge, Lisa <lstrobridg@pa.gov>; India McGhee <India.McGhee@Phila.gov>; Jane Hwang <Jane.Hwang@Phila.gov>; Aurora Trainor <Aurora.Trainor@phila.gov>; Dawn Kiesewetter <Dawn.Kiesewetter@phila.gov>  
**Subject:** Re: PIP Request-1646 S. 51st Street

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Good afternoon.

Please see the attached letter regarding the PIP for 1646 S. 51st St.

Thank you.

Leigh Anne Rainford, MPH

Program Administrator of Food Protection and Environmental Engineering

Environmental Health Services | Philadelphia Department of Public Health

7801 Essington Avenue | Philadelphia, PA 19153

Phone: (215) 685 – 7497

[LeighAnne.Rainford@Phila.gov](mailto:LeighAnne.Rainford@Phila.gov)



---

**From:** Foster, Crystal <[Crystal.Foster@arcadis.com](mailto:Crystal.Foster@arcadis.com)>

**Sent:** Wednesday, December 4, 2024 1:09 PM

**To:** Cheryl Reilly <[Cheryl.Reilly@PHILA.GOV](mailto:Cheryl.Reilly@PHILA.GOV)>

**Cc:** Dawn Kiesewetter <[Dawn.Kiesewetter@phila.gov](mailto:Dawn.Kiesewetter@phila.gov)>; [cdbrown@pa.gov](mailto:cdbrown@pa.gov) <[cdbrown@pa.gov](mailto:cdbrown@pa.gov)>;  
Leigh-Anne Rainford <[LeighAnne.Rainford@phila.gov](mailto:LeighAnne.Rainford@phila.gov)>; India McGhee <[India.McGhee@Phila.gov](mailto:India.McGhee@Phila.gov)>;  
[cdbrown@pa.gov](mailto:cdbrown@pa.gov) <[cdbrown@pa.gov](mailto:cdbrown@pa.gov)>; Eric Carlson <[ecarlson@alliancehp.com](mailto:ecarlson@alliancehp.com)>; Anthony Reitano  
<[areitano@heroldlaw.com](mailto:areitano@heroldlaw.com)>; Brunt, Larry <[Larry.Brunt@arcadis.com](mailto:Larry.Brunt@arcadis.com)>; [msabetta@pa.gov](mailto:msabetta@pa.gov)  
<[msabetta@pa.gov](mailto:msabetta@pa.gov)>; Patel, Ragesh <[rapatel@pa.gov](mailto:rapatel@pa.gov)>

**Subject:** RE: PIP Request-1646 S. 51st Street

**External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.**

Good afternoon,

Attached is the Public Involvement Plan for the above-referenced site. Thank you!

*-Crystal*

**Crystal L. Foster**

Senior Geologist

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M +1 412 527 2575

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**From:** Cheryl Reilly <[Cheryl.Reilly@PHILA.GOV](mailto:Cheryl.Reilly@PHILA.GOV)>  
**Sent:** Monday, August 5, 2024 2:35 PM  
**To:** Foster, Crystal <[Crystal.Foster@arcadis.com](mailto:Crystal.Foster@arcadis.com)>  
**Cc:** Dawn Kiesewetter <[Dawn.Kiesewetter@phila.gov](mailto:Dawn.Kiesewetter@phila.gov)>; [cdbrown@pa.gov](mailto:cdbrown@pa.gov); Leigh-Anne Rainford <[LeighAnne.Rainford@phila.gov](mailto:LeighAnne.Rainford@phila.gov)>; India McGhee <[India.McGhee@Phila.gov](mailto:India.McGhee@Phila.gov)>  
**Subject:** PIP Request-1646 S. 51st Street

You don't often get email from [cheryl.reilly@phila.gov](mailto:cheryl.reilly@phila.gov). [Learn why this is important](#)

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Good Afternoon Ms. Foster,

Please see the attached PIP request for 1646 S. 51<sup>st</sup> Street.

Thank you.

\*\*\*\*\*

Cheryl Ann Reilly  
Health Commissioner's Office  
1101 Market Street, 13<sup>th</sup> Floor  
Philadelphia, PA 19107  
[Cheryl.Reilly@phila.gov](mailto:Cheryl.Reilly@phila.gov)

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**Alliance 51<sup>st</sup> Street LLC**

# **Public Involvement Plan**

**Alliance 51<sup>st</sup> Street Terminal**

**1646 South 51<sup>st</sup> Street**

**Philadelphia, Pennsylvania 19143**

December 4, 2024

Revised January 21, 2025

## Public Involvement Plan

**Alliance 51<sup>st</sup> Street Terminal**

**1646 South 51<sup>st</sup> Street**

**Philadelphia, Pennsylvania 19143**

**January 2025**

**Prepared By:**

Arcadis U.S., Inc.

2100 Georgetown Drive, Suite 402

Sewickley

Pennsylvania 15143

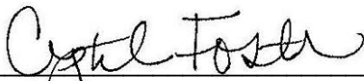
Phone: 724 742 9180

**Our Ref:**

30108678

**Prepared For:**

Alliance 51<sup>st</sup> Street LLC



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Crystal Foster

Senior Geologist



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Lawrence Brunt, P.E.

Project Manager

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## Acronyms and Abbreviations

Act 2	Land Recycling Program
Arcadis	Arcadis U.S., Inc.
AST	aboveground storage tank
MSC	medium-specific concentration
NIR	Notice of Intent to Remediate
PADEP	Pennsylvania Department of Environmental Protection
PIP	Public Involvement Plan
SHS	statewide health standards
site	1646 South 51 <sup>st</sup> Street, Philadelphia, Pennsylvania
SSS	site-specific standards



# 1 Introduction

On behalf of Alliance 51<sup>st</sup> Street LLC (Alliance), Arcadis U.S., Inc. (Arcadis) prepared this Public Involvement Plan (PIP) to present a framework for informing and involving the public and other parties that may be interested in remediation plans for the property located at 1646 South 51<sup>st</sup> Street in Philadelphia, Pennsylvania 19143 (site; Figure 1). This PIP was prepared in accordance with the Pennsylvania Department of Environmental Protection (PADEP) requirements of Title 25, Chapter 250, 25 Pennsylvania Code §§ 250.5 and 250.6, known as Act 2. This PIP will be followed for each Act 2 report submitted to PADEP for the Site. The anticipated schedule of activities is presented in Attachment A.

## 1.1 Site Location and History

The Site is in Philadelphia County, in the City of Philadelphia. Alliance 51<sup>st</sup> Street LLC acquired the Site from PBF Logistics Terminals LLC (PBF Logistics) in December 2021. PBF Logistics purchased the Site in 2016 from Plains Products Terminals LLC. Allied Oil Co. Hess Oil & Chemical Corporation operated the Site prior to Plains Products Terminals LLC. The main Site primarily operated as a petroleum product terminal (from approximately 1951 to 2021); historically, the Site also was used for lumber storage (in 1923 prior to development), and as a cardboard container manufacturer (from approximately 1923 to 1945).

According to historical resources, fifteen aboveground storage tanks (ASTs) were constructed at the Site between 1951 and 1975 as part of the operations for Allied Oil Co. (Allied) and later Hess Oil & Chemical Corporation Fuel Oil Terminal (Hess). Locations of the former ASTs are shown on Figure 2. The ASTs, loading racks, and associated piping were removed as part of the AST closure activities and the tank foundations, concrete and soil containment berms, and miscellaneous buildings have been removed as part of the redevelopment activities.

The northwestern portion of the Site previously contained three buildings and a canopy area, which have been demolished. The areas around the buildings are paved with asphalt. The remainder of the Site is mostly covered with gravel, although some areas in the vicinity of former buildings are paved.

A large soil pile (estimated at ~25,000 cubic yards and 20 feet high) was located on the eastern portion of the Site. While the origin of the soil could not be confirmed, the presence of the stockpile appears to coincide with the installation of the ASTs on the Site. The soil was likely excavated from the southwestern portion of the Site during the construction of the ASTs. During the recent redevelopment activities, some of the soil has been spread across the property as part of the grading of site.

Organic compounds and lead are present in site media, primarily associated with the former use of the property as a fuel oil terminal. Soil borings in the former AST and piping area identified exceedances of Pennsylvania Department of Environmental Protection (PADEP) soil Medium Specific Concentrations (MSCs) for volatile organic compounds, semivolatile organic compounds, and lead. Groundwater samples from permanent monitoring wells have exceedances of groundwater MSCs for benzene and lead associated with the former terminal operations. Hexavalent chromium also is present in soil and groundwater due to the historic placement of fill onsite in the early 1900s.

The site has recently undergone environmental investigations. An Act 2 Notice of Intent to Remediate (NIR) was submitted to the PADEP in February 2022 and proposed attainment of PADEP statewide health standards (SHS). In April 2024, the Philadelphia Water Department observed yellow-colored water leaving the Site, near the Bartram's Garden Mile Trail. Upon further investigation it was determined that the water contained chromium and hexavalent chromium. From a review of historical materials, the presence of chromium onsite is due to the historical placement of fill across the Site in the early 1900s. However, as determined by sampling by Alliance and

PADEP, chromium and hexavalent chromium are also present offsite at locations not impacted by the Site. Alliance has taken measures to eliminate any chromium originating from the Site.

A revised NIR was submitted in July 2024 proposing attainment of a combination of SHS and site-specific standards (SSS); which will be demonstrated following further investigation. The future intended use of the site is non-residential. Deed restrictions will be put into place that will memorialize site use restrictions.

## 1.2 Purpose

The goal of this PIP is to facilitate communication and interaction among Alliance, Arcadis, the local community, PADEP, and other interested parties and organizations regarding the status of the remedial investigation and site closure activities. To accomplish this goal, Arcadis has organized several public involvement opportunities, including:

- Public meetings, as needed, near the site
- Maintenance of a site mailing list
- Establishment of an online information repository for public access of documents
- Designation of a contact person for community questions

These activities are described further in Section 3.

## 2 Public Involvement Activities

This section discusses the public involvement opportunities established to inform the public about remedial investigation and closure activities at the site. Act 2 reports will be submitted to the interested parties at the same time as submitted the PADEP, to allow for the 30-day public comment period. Following the public comment period, a response to comments, if any, and an amended report, as necessary, will be submitted to the PADEP no later than 45 days after the close of the public comment period.

### Public Meeting

A public meeting will be held promptly after the 30-day public period for the first Act 2 report (the Remedial Investigation Report and Cleanup Plan) is submitted to the PADEP. Following the public meeting, a response to comments and an amended report, as necessary, will be submitted to the PADEP no later than 45 days after the date of the public meeting.

The objective of a public meeting or hearing will be to discuss activities planned or proposed for the Site, and to gather feedback from the community, local leaders, and other interested parties. A public meeting will be organized by Alliance and/or Arcadis in response to the request by the City of Philadelphia.

The public meeting will be scheduled for a weeknight evening to maximize the potential for interested parties to attend. The meeting will be designed to be informal and interactive so that attendees can hear key findings from project reports and discuss issues during a question-and-answer period. Most of the meeting time will be devoted to discussion of project status and issues, which will help interested parties remain informed and involved in project activities, and track progress toward the achievement of overall project goals. Based on the request from the City of Philadelphia, the following topics will be discussed in the meeting:

- Location and concentration of contaminants identified at the Site;

- Potential health effects of the contaminants based on the concentrations;
- Measures that will be implemented to protect the community;
- Remedial measures that will be implemented to address the contaminants; and
- Procedures to be implemented during redevelopment to minimize dust and control erosion.

Public notice of the meeting will be given at least 30 days prior to the meeting by placing a notice in the local newspaper (the Philadelphia Inquirer). Notice of the public meeting will also be made directly to local civic associations (e.g., the township historical commission) and state and municipal representatives, in addition to the newspaper advertisement. Act 2 documents will be made available to the public at least 30 days prior to the meeting, and the newspaper advertisement will provide details on the location of the information repository.

To facilitate the notification process, an attendance sign-in log will be made available during public meeting to gather names and contact information for those who wish to be added to the site mailing list for use in future notifications.

Alternate locations were evaluated for the public meeting considering users of the trail, accessibility, logistics, and accommodations. In consideration of these factors, Arcadis recommends the following location for public meetings:

- Walnut Street West Library:
  - Address: 201 South 40<sup>th</sup> Street Philadelphia, PA 19104
  - Located 1.6 miles from the Site
  - Phone: 215.685.7671
  - Website: <https://libwww.freelibrary.org/locations/walnut-street-west-library>
  - The library meeting room has a 100-person capacity. This is the same location that is proposed for the Information Repository, described in Section 2.3. An online meeting platform will also be utilized to retain documents, and to stream the meetings, if possible.

Comments provided by the public in writing and orally at the public meeting will be summarized and a responsiveness document will be prepared responding to each comment or groups of similar comments, and published in the Information Repository.

## 2.1 Site Mailing List

To facilitate communication, public involvement, and dissemination of information, Arcadis will maintain a site mailing list to distribute notices and other site-related information, as appropriate. The mailing list will include, but is not limited to, the following: owner(s) of the site; local officials; state officials; individuals who attend public meetings; people who make inquiries to Arcadis, Alliance, or the PADEP; community groups; and the information repository and newspaper. Interested individuals can be added to or removed from the mailing list by providing contact information on sign-in sheets at public meetings or by contacting the Arcadis project manager listed below. To protect the privacy of individuals, information provided to Arcadis for the site mailing list will not be used for any other purpose.

The current Site mailing list is provided in Table 1, below. Mailing list recipients will be notified of upcoming public meetings and report submissions.

## Public Involvement Plan

Table 1 Site Mailing List

Name	Company/Position	Address	Contact Information
<b>Frank A. Franklin</b>	Office of the Health Commissioner – Interim Health Commissioner – Property Owner	1101 Market St. 13 <sup>th</sup> Floor Philadelphia, PA 19107	Email (assistant): <a href="mailto:maya.lindsay@phila.gov">maya.lindsay@phila.gov</a> Phone: 215.686.5200
<b>Eric Carlson</b>	Alliance 51 <sup>st</sup> Street, LLC – Vice President of Development & Construction	40 Morris Ave, Ste 230, Bryn Mawr, PA 19010	Email: <a href="mailto:ecarlson@allianceshp.com">ecarlson@allianceshp.com</a>
<b>Anthony Reitano, Esq.</b>	Herold Law, P.A. – Attorney	25 Independence Blvd., Warren, New Jersey, 07059	Email: <a href="mailto:areitano@heroldlaw.com">areitano@heroldlaw.com</a> Phone: 908.647.1022
<b>Dawn Kieseewetter</b>	Environmental Health Services – Acting Director	NA	Email: <a href="mailto:Dawn.Kieseewetter@Phila.gov">Dawn.Kieseewetter@Phila.gov</a>
<b>India McGhee</b>	Regulatory Law Unit – Deputy City Solicitor		Email: <a href="mailto:India.McGhee@Phila.gov">India.McGhee@Phila.gov</a>
<b>Leigh Anne Rainford</b>	Office of the Health Commissioner – Environmental Engineering  Primary Contact for City Correspondences	1101 Market Street, 13 <sup>th</sup> Floor Philadelphia, Pennsylvania 19107	Email: <a href="mailto:LeighAnne.Rainford@Phila.gov">LeighAnne.Rainford@Phila.gov</a> Phone: 215.685.7497
<b>Anthony Hardy Williams</b>	Pennsylvania State Senators Office– Senator (8 <sup>th</sup> District)	NA	Email: <a href="mailto:anthony.williams@pasenate.com">anthony.williams@pasenate.com</a>
<b>Regina Young</b>	Pennsylvania State Representatives Office – Representative (185 <sup>th</sup> District)	NA	Email: <a href="mailto:ryoung@pahouse.net">ryoung@pahouse.net</a>
<b>Joanna McClinton</b>	Pennsylvania State Representatives Office – Speaker (191 <sup>st</sup> District)	NA	Email: <a href="mailto:JMcClinton@pahouse.net">JMcClinton@pahouse.net</a>
<b>Jamie Gauthier</b>	Philadelphia City Council – Councilmember (3 <sup>rd</sup> District)	NA	Email: <a href="mailto:Jamie.Gauthier@phila.gov">Jamie.Gauthier@phila.gov</a>
<b>Roque Schipilliti</b>	City of Philadelphia – Director of Safety and Loss Prevention	NA	Email: <a href="mailto:Roque.Schipilliti@phila.gov">Roque.Schipilliti@phila.gov</a>
<b>Aurora Trainor</b>	City of Philadelphia – Environmental Justice Coordinator	NA	Email: <a href="mailto:Aurora.Trainor@phila.gov">Aurora.Trainor@phila.gov</a>
<b>Maitreyi Roy</b>	Bartram's Garden	NA	Email: <a href="mailto:mroy@bartramsgarden.org">mroy@bartramsgarden.org</a>
<b>Leeannah McNew</b>	Clean Air Council	NA	Email: <a href="mailto:lmcnew@cleanair.org">lmcnew@cleanair.org</a>
<b>Melba Bingham</b>	Rise Up	NA	Email: <a href="mailto:mbingham3@riseup.net">mbingham3@riseup.net</a>
<b>Ed Rodgers</b>	Delaware Riverkeeper Network	925 Canal Street 7th Floor Suite 3701 Bristol, PA 19007	Email: <a href="mailto:Ed@delawareriverkeeper.org">Ed@delawareriverkeeper.org</a>
<b>Andrew Gentsch</b>	51st Republican Ward	NA	Email: <a href="mailto:agent3@earthlink.net">agent3@earthlink.net</a>

Name	Company/Position	Address	Contact Information
			Phone: 215.729.1090
<b>Michael Ross</b>	Southwest Philadelphia District Services (SWPDS)	NA	Email: <a href="mailto:swpds@aol.com">swpds@aol.com</a> Phone: 484.250.9055
<b>Gregory R. Benjamin</b>	51st Ward Democratic Executive Committee	NA	Email: <a href="mailto:greben5030@comcast.net">greben5030@comcast.net</a> Phone: 267.254.9972
NA	City & County of Philadelphia - Municipal Manager	1401 John F. Kennedy Blvd Philadelphia, PA 19107	NA
NA	Office of Sustainability	One Parkway Building 1515 Arch St., 13th Floor Philadelphia, PA 19102	Email: <a href="mailto:sustainability@phila.gov">sustainability@phila.gov</a> Phone: 215.686.3495
NA	Air Pollution Control Board	7801 Essington Avenue Philadelphia, PA 19153	Email: <a href="mailto:dphams_service_requests@phila.gov">dphams_service_requests@phila.gov</a> Phone: 215.685.7584 Fax: 215.685.7593
NA	Office of the Mayor	City Hall, Office 215 Philadelphia, PA 19107	Phone: 215.686.2181
NA	Mayor's Office of Public Engagement	City Hall Room 115 Philadelphia, PA 19107	Email: <a href="mailto:public.engagement@phila.gov">public.engagement@phila.gov</a> Phone: 215.686.2181

**Note:**

NA = Not available.

## 2.2 Information Repository

Notifications of reports that are going to be submitted to the PADEP will be posted in the Philadelphia Inquirer for one day. Upon these notifications, a public comment period of 30 days will be provided for review of reports. The notification will contain the deadline for receipt of comments and the name and address to submit comments. The public comment period will be conducted prior to submittal of each report to PADEP. Copies of the comments received will be provided in the report along with how each comment was addressed. Information on the availability of each report for review and comment will be distributed to the mailing list. Reasonable proof of publication of the notice of public comment period will be provided in the report. A summary of the report will be provided in plain language to facilitate public review.

To provide a central, publicly accessible location for individuals to access site-related documents, a local information repository has been established at the Walnut Street West Library at 201 South 40<sup>th</sup> Street in Philadelphia, as discussed in Section 2.1. Additionally, all documents located in the information repository will be electronically shared, via email, to [LeighAnne.Rainford@phila.gov](mailto:LeighAnne.Rainford@phila.gov). An online document repository will also be created. The document repository will include summaries of key documents translated into common languages.

### Contacts

To keep the public and others who may be interested in the implementation activities at the site informed and involved, Arcadis developed this PIP and will be responsible for implementing the various activities of the public involvement program. Mr. Lawrence Brunt serves as Arcadis' contact person for questions from the community. Lawrence's contact information is provided below:

Lawrence Brunt  
Arcadis U.S., Inc  
1 Harvard Way, Suite 5  
Hillsboro Township, NJ 08844  
Phone: 908.319.4671  
Email: [larry.brunt@arcadis.com](mailto:larry.brunt@arcadis.com)

The PADEP Southeast Regional Office is the agency of authority and provides project oversight to confirm compliance with applicable regulations. Contact information for the PADEP office is as follows:

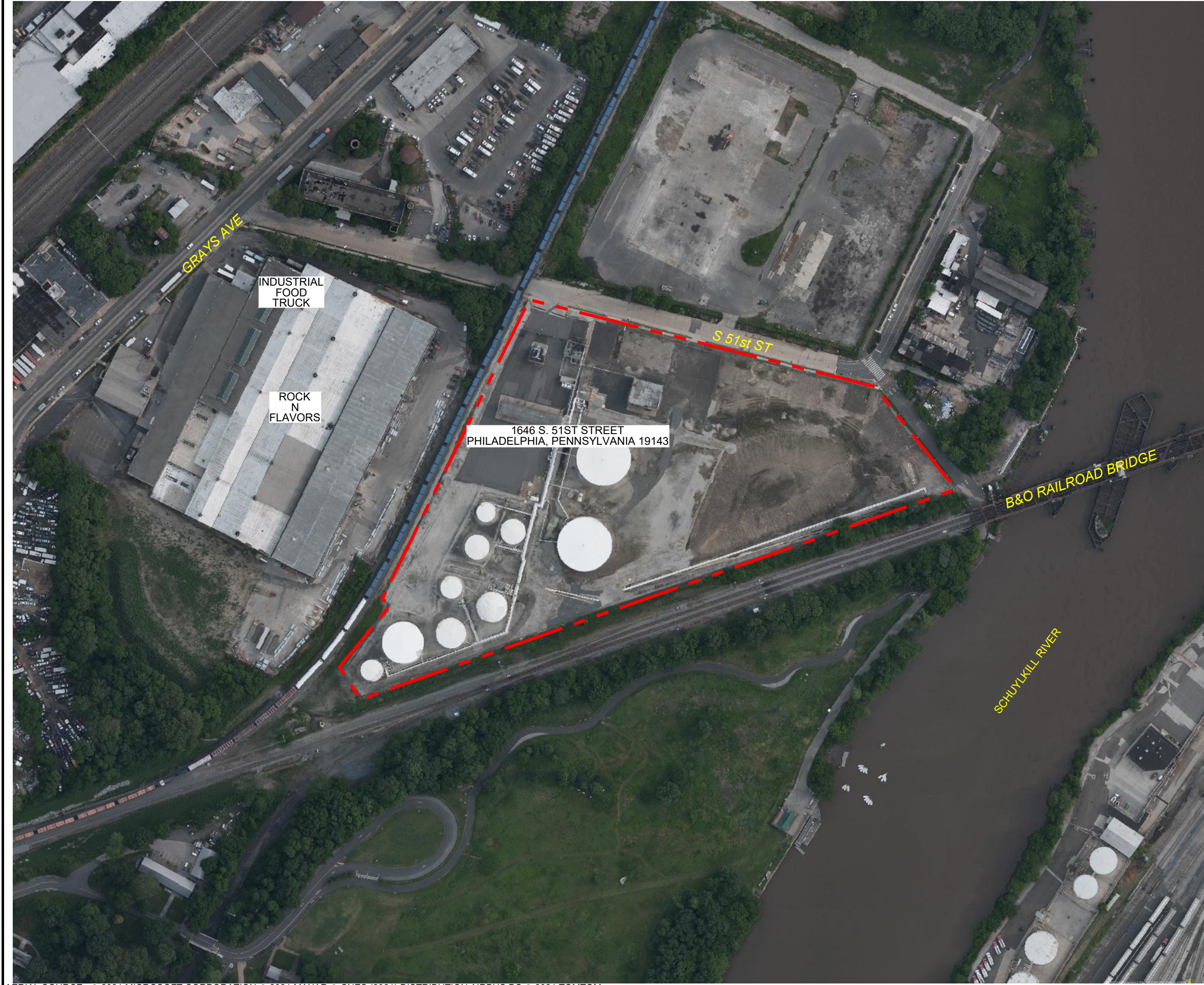
PADEP Environmental Cleanup & Brownfields Program  
2 East Main Street  
Norristown, Pennsylvania 19401  
Project Officer: Matthew Sabetta  
Phone: 484.250.5900  
Email: [RA-EP-SEROECB@pa.gov](mailto:RA-EP-SEROECB@pa.gov)

# Figures



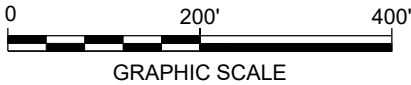






AERIAL SOURCE: © 2021 MICROSOFT CORPORATION © 2021 MAXAR © CNES (2021) DISTRIBUTION AIRBUS DS © 2021 TOMTOM

**LEGEND:**  
- - - - - PROPERTY BOUNDARY  
Aboveground storage tanks have been removed.



ALLIANCE HP INVESTMENTS, LLC  
1646 S. 51ST STREET  
PHILADELPHIA, PENNSYLVANIA

**SITE PLAN**





# Attachment A

## 51<sup>st</sup> Street Act 2 Schedule

- Quarterly Groundwater Monitoring (2 Quarterly Events for Site Characterization and 4 Events for Attainment)
  - 1<sup>st</sup> Quarterly Groundwater Event for Chromium completed
  - 2<sup>nd</sup> Quarterly Groundwater Event for Chromium completed
  - Week of February 24, 2025 – 3<sup>rd</sup> Quarterly Groundwater Event for Chromium
  - Week of May 26, 2025 – 4<sup>th</sup> Quarterly Groundwater Event for Chromium
- Soil Investigation
  - December 2024 – Perform Additional Soil Sampling
- Public Involvement Plan
  - December 4<sup>th</sup> – Submit PIP to PADEP and the City of Philadelphia
  - Public meeting pursuant to the PIP promptly after close of the public comment period for the RIR
- Site Characterization Report/Remedial Investigation Report/Cleanup Plan
  - December 2024 – January 2025 - Prepare Report
  - January 2025 – Perform Groundwater Modeling
  - February 14, 2025 – Submit to PADEP
  - February 14, 2025 - Publish thirty-day public notice and comment period in local newspaper
  - Within 45 days after public meeting - submit response to comments to PADEP and report addendum, as necessary
- Remedial Investigation Report/Cleanup Plan Addendum
  - Summarize the results from the two additional groundwater monitoring events performed in February and May 2025
  - June 2025 – Prepare Addendum
  - July 15, 2025 – Submit to PADEP
  - July 15, 2025 – Publish thirty-day public notice and comment period in local newspaper
  - Within 45 days of close of public comment period - submit response to comments, if any, and report addendum, if necessary.
- Site Redevelopment
  - October/November 2024 - Perform geophysical site testing for building construction
  - Start of building construction – to be determined based upon market/financial conditions.
- Final Report Preparation and Submission - Within sixty days of completion of Site Development with public notice and response to comments and revised report as appropriate
- Establish Environmental Covenants - Within thirty days after PADEP approval issued for Final Report

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Pennsylvania 15143  
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