

From: [Brunt, Larry](#)
To: [Sabetta, Matthew](#); [Flannery, Rebecca](#)
Cc: [Brown, C David](#); [Patel, Ragesh](#); [Eric Carlson](#); [Anthony J. Reitano Esq. \(areitano@heroldlaw.com\)](#)
Subject: [External] RE: Alliance 51st Street Act 2 Discussion
Date: Thursday, July 11, 2024 11:22:58 AM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[2024-7-9 Test Pit Locations Soil and Temporary Well Locations.pdf](#)
[Table 1 2024_06 Soil Sampling Results.pdf](#)
[Table 2 2024_06 Temp Well Results.pdf](#)
[Test Pit 101.jpg](#)
[Test Pit 102.jpg](#)
[Test Pit 103.jpg](#)
[Test Pit 104.jpg](#)
[Test Pit 105.jpg](#)
[RE Alliance 51st Street Terminal.msg](#)
[1929 photo Geo W Smith woodworking.pdf](#)
[1929 photo Geo W Smith woodworking 2.pdf](#)

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Rebecca and Matt,

We are following up on the recent e-mails and telephone calls, and are providing the summary below for the Alliance 51st Street site. This may help with the transition of the Act 2 case. As I mentioned to Matt on Monday, we would like to set up a call with PADEP, which would also include our client and counsel (included on email), to review the updated site investigation information for the recently identified chromium issue and the status of the Act 2 case. We can also discuss the revised NIR for the Act 2 case and how to address that given our findings summarized below. Please let us know some dates and times for the call.

By way of background, attached is the email that I sent to Rebecca on June 10th which describes the ongoing investigation activities into the chromium issue. The presence of chromium is not related to the previous petroleum terminal operations or the historic operations, lumber and cardboard manufacturing, performed at the site. We believe the presence of chromium is a background issue associated with historic filling of the general area. We have been researching historical records and performing additional investigation activities to identify the extent of the filling. As indicated in the June 10th email, we installed and sampled 11 additional soil borings and 7 temporary wells on the western and northern portions of the site on June 7th. We identified stained soil in four of those additional borings (SB-505, SB-506, SB-508 and SB-513) at depths starting at a few feet below grade and extending to 10-15 feet below grade. Borings SB-506 and SB-508 were located on the northern and western property boundaries, respectively, indicating the stained soil beginning at a few feet below grade is offsite as well. Soil samples were collected at 0 to 6 inches above the water table. The sampling results for these borings and temporary wells are summarized in the attached tables. The soil sampling identified hexavalent chromium in only one boring, SB-511, at a concentration greater than the Used Aquifer Non-Residential Soil to Groundwater MSC. Total chromium was

detected in two groundwater samples, TW-505 and TW-511, at concentrations greater than the Non-Residential Used Aquifer MSC. The boring and temporary well locations are illustrated on the attached figure.

After reviewing these results and the previous findings, we installed test pits on the southern property boundary on July 3rd to determine the extent of the historic filling on the southern portion of the site. We installed five test pits (TP-101 to TP-105) along the southern property boundary and identified the stained soil layer in each test pit which was encountered a few feet below grade and varied in thickness in each test pit. At one location, TP-105, the stained soil layer started at approximately 3 feet below grade and extended to the bottom of the test pit at 17 feet below grade. The test pits confirmed that the presence of the chromium is a background issue associated with historic filling activities that were occurring on and off the site. A few photographs of the test pits illustrating the stained soil layer are attached. In addition, a figure illustrating the approximate locations of the test pits is attached. The figure also illustrates the borings and test pits which contained the historic fill layer and stained soil during our recent and previous investigation activities.

During a previous conversation with Rebecca regarding the chromium investigation at the site, we mentioned that we were researching historical records to determine if this area of Philadelphia was historically filled with material. At that time, Rebecca mentioned that there is an associate in your office who is very good at researching historical records. Was she able to identify any records of historic filling in the area?

We were able to find a few historic aerial photographs from 1929 (see attached) that illustrate the low-lying area on site where the stained soil is primarily being identified. The aerial photo also illustrates the sand mining operation on the other side of the railroad tracks. This area was subsequently filled and is now Bartram's Gardens.

We can discuss these findings further on our call. If you have any questions in the meantime, let us know.

Thanks,
Larry

Lawrence G. Brunt, P.E.

Principal Engineer

Arcadis U.S., Inc.

1 Harvard Way, Suite 5 | Hillsborough, NJ 08844 | USA

T. +1 908 526 1000

D. +1 908 685 7878

M. +1 908 391 4371

F. +1 908 253 3295

www.arcadis.com



Professional Registration / PE-NJ

From: Sabetta, Matthew <msabetta@pa.gov>
Sent: Monday, July 1, 2024 1:45 PM
To: Brunt, Larry <Larry.Brunt@arcadis.com>
Cc: Brown, C David <cdbrown@pa.gov>; Patel, Ragesh <rapatel@pa.gov>
Subject: Alliance 51st Street Act 2 Discussion

You don't often get email from msabetta@pa.gov. [Learn why this is important](#)

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

Hi Larry,

I am following up on Rebecca Flannery's email from earlier. As she stated, I am taking over the site for her and would like to get an update on site activities. Additionally, I would also like to discuss the planned timeframe for Act 2 submissions for the site. Let me know what your availability for a call is like next week when you return to the office.

Matt

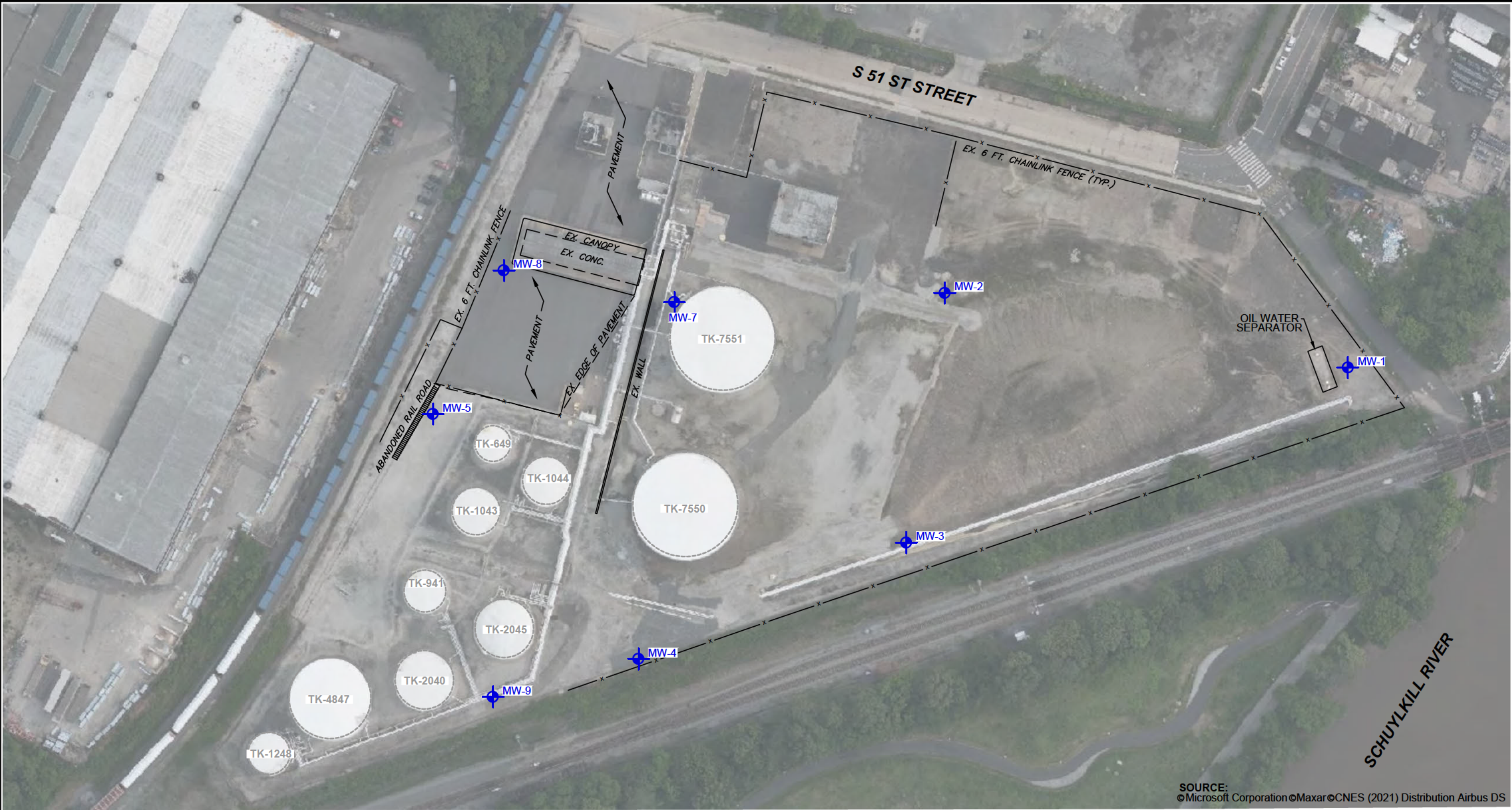
Matthew Sabetta | Licensed Professional Geologist
Department of Environmental Protection | Southeast Regional Office
2 E. Main Street | Norristown, PA 19401
Phone: 484.250.5788 | Fax: 484.250.5961
www.dep.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers.

This email and any files transmitted with it are the property of Arcadis and its affiliates. All rights, including without limitation copyright, are reserved. This email contains information that may be confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not an intended recipient, please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error, please return it to the sender and then delete the email and destroy any copies of it. While reasonable precautions have been taken to ensure that no software or viruses are present in our emails, we cannot guarantee that this email or any attachment is virus free or has not been intercepted or changed. Any opinions or other information in this email that do not relate to the official business of Arcadis are neither given nor endorsed by it.










SOURCE:
©Microsoft Corporation©Maxar©CNES (2021) Distribution Airbus DS

LEGEND:

 MONITORING WELL

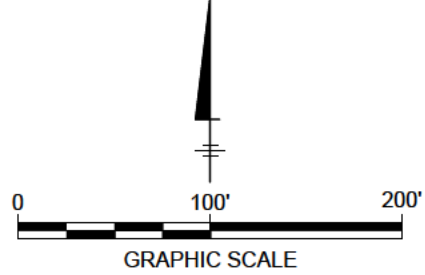
 CHAIN LINK FENCE

 FORMER TANK AND TANK IDENTIFICATION

NOTES:

1. MONITORING WELL LOCATIONS SURVEYED BY DPK ENGINEERING, MONITORING WELL LOCATION MAP, DATED 04/04/2021, ELECTRONIC FILE 22-9519 MW00 2022-04-06.

2. PLAN DATUM: PENNSYLVANIA STATE PLANE COORDINATES: PA83-SF.



ALLIANCE 51st Street LLC
1646 S 51 ST STREET
PHILADELPHIA, PENNSYLVANIA

**BORING, TEST PIT AND TEMPORARY
WELL LOCATIONS**


 **ARCADIS**

FIGURE
1

Table 1
Summary of Soil Sampling Results- June 07, 2024
Alliance 51st Street LLC
1646 South 51st Street
Philadelphia, Pennsylvania

SAMPLE ID:	Pennsylvania Use Aquifers Non-Residential Generic Soil to Groundwater MSCs Criteria	Pennsylvania Non-Use Aquifers Non- Residential Generic Soil to Groundwater MSCs Criteria	Pennsylvania Non- Residential Direct Contact Surface Soil (0-2') MSCs Criteria	Pennsylvania Non- Residential Direct Contact Subsurface Soil (2-15')	SB-505_9.5-10				SB-506_9.5-10				SB-507_14.5-15				SB-508_14.5-15				SB-509_9.5-10				SB-510_8.5-9			
LAB ID:					L2432189-01				L2432189-02				L2432189-03				L2432189-04				L2432189-05				L2432189-12			
COLLECTION DATE:					6/7/2024				6/7/2024				6/7/2024				6/7/2024				6/7/2024				6/7/2024			
SAMPLE DEPTH:					9.5-10				9.5-10				14.5-15				14.5-15				9.5-10				8.5-9			
SAMPLE MATRIX:					SOIL				SOIL				SOIL				SOIL				SOIL				SOIL			
ANALYTE	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL
TOTAL METALS																												
Chromium, Trivalent*	190000	190000	190000	190000	193				11.9				25.184				44.7				24.9				28.6			
Chromium, Total					193		0.94	0.09	11.9		1.13	0.109	25.4		0.83	0.08	44.7		1.02	0.098	24.9		0.974	0.094	28.6		0.84	0.081
GENERAL CHEMISTRY																												
Chromium, Hexavalent	190	190000	180	140000	0.988	U	0.988	0.198	1.2	U	1.2	0.24	0.216	J	0.863	0.172	1.06	U	1.06	0.212	1	U	1	0.2	0.875	U	0.875	0.175
Solids, Total					81		0.1	NA	66.6		0.1	NA	92.7		0.1	NA	75.4		0.1	NA	79.9		0.1	NA	91.4		0.1	NA

SAMPLE ID:	Pennsylvania Use Aquifers Non-Residential Generic Soil to Groundwater MSCs Criteria	Pennsylvania Non-Use Aquifers Non- Residential Generic Soil to Groundwater MSCs Criteria	Pennsylvania Non- Residential Direct Contact Surface Soil (0-2') MSCs Criteria	Pennsylvania Non- Residential Direct Contact Subsurface Soil (2-15')	SB-511_11-11.5				SB-511_9.5-10				SB-512_9.5-10				SB-513_9.5-10				SB-514_9.5-10				DUP-SOIL					
LAB ID:					L2432189-07				L2432189-06				L2432189-08				L2432189-09				L2432189-10				L2432189-11					
COLLECTION DATE:					6/7/2024				6/7/2024				6/7/2024				6/7/2024				6/7/2024									
SAMPLE DEPTH:					11-11.5				9.5-10				9.5-10				9.5-10				9.5-10									
SAMPLE MATRIX:					SOIL				SOIL				SOIL				SOIL				SOIL									
ANALYTE	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL		
TOTAL METALS																														
Chromium, Trivalent*	190000	190000	190000	190000	12170				47.56				24.3				150				8.749				16.4					
Chromium, Total					20300		12.8	1.23	50.8		0.899	0.086	24.3		0.922	0.089	150		1.47	0.141	9.02		1.02	0.098	16.4		0.969	0.093		
GENERAL CHEMISTRY																														
Chromium, Hexavalent	190	190000	180	140000	8130		1320	264	3.24		0.94	0.188	0.938	U	0.938	0.188	1.52	U	1.52	0.304	0.271	J	1.08	0.216	1	U	1	0.2		
Solids, Total					60.7		0.1	NA	85.1		0.1	NA	85.3		0.1	NA	52.6		0.1	NA	73.9		0.1	NA	79.9		0.1	NA		

NOTES:
MSC - Medium Specific Concentration
PADEP - Pennsylvania Department of Environmental Protection
Q - Qualifier
Conc - Concentration
RL - Reporting Limit
MDL - Minimum Detection Limit
GW - Groundwater
* calculated based on the difference between detected total chromium and hexavalent chromium concentrations
U - Compound was undetected at the listed laboratory method detection limit.
Concentrations reported in milligrams per kilogram (mg/kg)
Exceeds the applicable PADEP Standard

Table 2
Summary of Groundwater Sampling Results- June 07, 2024
Alliance 51st Street LLC
1646 South 51st Street
Philadelphia, Pennsylvania

SAMPLE ID:	Pennsylvania Non-Residential Non-Use Aquifer Groundwater MSCs Criteria	Pennsylvania Non-Residential Used Aquifer Groundwater MSCs Criteria	TW-505				TW-506				TW-509				TW-511			
LAB ID:			L2432185-03				L2432185-04				L2432185-05				L2432185-06			
COLLECTION DATE:			6/7/2024				6/7/2024				6/7/2024				6/7/2024			
SAMPLE MATRIX:			WATER				WATER				WATER				WATER			
ANALYTE	(ug/l)	(ug/l)	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL
DISSOLVED METALS																		
Chromium, Dissolved	100000	100	137.9		1	0.178	0.272	J	1	0.178	7.087		1	0.178	3316		100	17.8
TOTAL METALS																		
Chromium, Total	100000	100	7744		100	17.8	8.149		5	0.89	15.98		5	0.89	13440		200	35.6
GENERAL CHEMISTRY																		
Chromium, Hexavalent			3	J	10	3	3	U	10	3	3	U	10	3	1330		50	15
Chromium, Hexavalent (Unfiltered)			5	J	10	3	18		10	3	19		10	3	2460		100	30

SAMPLE ID:	Pennsylvania Non-Residential Non-Use Aquifer Groundwater MSCs Criteria	Pennsylvania Non-Residential Used Aquifer Groundwater MSCs Criteria	TW-512				TW-513				TW-514				DUP-GW			
LAB ID:			L2432185-02				L2432185-01				L2432185-08				L2432185-07			
COLLECTION DATE:			6/7/2024				6/7/2024				6/7/2024				6/7/2024			
SAMPLE MATRIX:			WATER				WATER				WATER				WATER			
ANALYTE	(ug/l)	(ug/l)	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL	Conc	Q	RL	MDL
DISSOLVED METALS																		
Chromium, Dissolved	100000	100	3.496		1	0.178	2.714		1	0.178	0.7002	J	1	0.178	0.8442	J	1	0.178
TOTAL METALS																		
Chromium, Total	100000	100	45.39		5	0.89	92.67		5	0.89	62		5	0.89	6.353		5	0.89
GENERAL CHEMISTRY																		
Chromium, Hexavalent			3	U	10	3	3	U	10	3	3	J	10	3	3	U	10	3
Chromium, Hexavalent (Unfiltered)			3	U	10	3	3	U	10	3	30		10	3	7	J	10	3

NOTES:
MSC - Medium Specific Concentration
PADEP - Pennsylvania Department of Environmental Protection
Q - Qualifier
Conc - Concentration
RL - Reporting Limit
MDL - Minimum Detection Limit
U - Compound was undetected at the listed laboratory method detection limit.
Concentrations reported in miligrams per kilogram (mg/kg)
Concentrations exceed the Non-Residential Used aquifer MSC









