



Pennsylvania
Department of Environmental Protection

August 14, 2024

Mr. Max Ryan
Alliance 51st Street, LLC
40 Morris Avenue, Suite 230
Bryn Mawr, PA 19010

Re: Receipt of Notice of Intent to Remediate
Statewide Health (Non-Residential)/Site-Specific Standards
Alliance 51st Street, a.k.a. 51st Street Terminal, PBF Logistics Products Terminal,
Plains Products Terminals, Allied Oil Company, Hess Oil & Chemical Corporation
eFACTS PF No. 855927
eFACTS Activity Nos. 60376 and 60377
1646 South 51st Street
City of Philadelphia
Philadelphia County

Dear Mr. Ryan:

This letter acknowledges receipt of your Notice of Intent to Remediate (NIR) on July 30, 2024, pertaining to the subject property and submitted in accordance with the Land Recycling and Environmental Remediation Standards Act (Act 2). The procedures set forth in Act 2 must be followed in order for this site to qualify for the liability protection provided by the Act. The Department of Environmental Protection (DEP) will not accept plans and reports until after the 30-day comment period following submission of the NIR ends.

The 30-day comment period following submission of the NIR allows the municipality the opportunity to request to be involved in the development of remediation and reuse plans for the property. If the municipality requests a public involvement plan, any comments and responses must be included in any subsequent Site-Specific Standard reports. Remedial investigation reports, risk assessment reports, cleanup plans, and final reports submitted to DEP under the site-specific standard need to be accompanied by the required fees and documentation verifying compliance with the public notification requirements.

Additional technical and program information can be found at www.dep.pa.gov (Business>Land>Land Recycling). Also, please refer to the Land Recycling checklists which are helpful in assuring reports are complete before submittal. DEP uses the checklists to perform administrative and technical completeness reviews when plans and/or reports are submitted. It is strongly encouraged to include the appropriate completed checklist with your Final Report submission. Land Recycling checklists can also be found at the website under 'Forms, Checklists & Notifications' link.

Please refer to the Standard Attachment for considerations of other programs which may be applicable to this property.

Mr. Matthew Sabetta is the project officer assigned to your project and will be working with you towards the remediation of this property. Frequent contact is encouraged between your representatives and our staff. If you have any questions or need further clarifications of our procedures, please contact the project officer by e-mail at msabetta@pa.gov or by telephone at 484.250.5788.

Sincerely,

C. David Brown, P.G. Digitally signed by C. David Brown, P.G.
Date: 2024.08.14 16:04:05 -04'00'

C. David Brown, P.G.
Professional Geologist Manager
Environmental Cleanup and Brownfields

Enclosure: Standard Attachment

cc: City of Philadelphia
Mr. Reitano, Esq. – Herold Law
Mr. Brunt, P.E. – Arcadis US, Inc.
Mr. Sabetta, P.G.
Ms. Costello, Esq.
Re 30 (GJS24ECB)855927-08142024-SHS SSS



Pennsylvania
Department of Environmental Protection

Bureau of Environmental Cleanup and Brownfields

Thank you for participating in the Pennsylvania Department of Environmental Protection's (DEP) Land Recycling Program. You are receiving this Standard Attachment because you have provided a Notice of Intent to Remediate or a Final Report submission to the department. The following program summaries are provided to you as a guide to other programs that are commonly associated with brownfield remediation projects. These programs are important for the successful completion of site remediation and the grant of liability relief for your site. Please note if several of the following items apply to your site, it may be valuable to request a pre-application coordination meeting with your assigned DEP Project Manager. For remediation projects that involve multiple programs, an initial coordination meeting is beneficial to determine required date of submission(s), program participation consideration(s), and priorities.

This list is not meant to be all inclusive, but does summarize a listing of programs that are commonly affiliated with these types of projects.

Land Recycling Program Considerations

Uniform Environmental Covenants Act (UECA)

Based on the remediation standard that you have selected for your remediation/redevelopment project, you may be required to submit an environmental covenant. The covenant, as defined and governed under the auspices of UECA, provides a tool to ensure that the conditions allowing for a risk-based cleanup will continue in the future. UECA requires that a completed and signed environmental covenant shall be submitted to the appropriate regional DEP office no later than 30 days from receipt of the final cleanup approval letter. A \$500 fee is required to be submitted with the environmental covenant. Once received, the DEP has 90 days to review and return the signed covenant for recordation. Notifications of recordation of the covenant are subsequently required to be sent within 90 days to the DEP and to the entities listed in Section 6507 of UECA and in accordance with the terms of the covenant. For more information, visit www.dep.pa.gov, under Businesses > Land > Land Recycling, select related information under 'Uniform Environmental Covenants'.

Other Program Requirements

Depending on the specific details of each case, other program requirements may be applicable to your site as cleanup is progressing and/or upon completion of Act 2 activities. These considerations are summarized in the following:

Land Disturbance

Depending on the remediation approach selected for your site, you must carefully evaluate the remedial activities to minimize erosion and sedimentation in conformance with Chapter 102 of the PA Code, Erosion and Sediment Control. These requirements may be satisfied with the development, implementation, and maintenance, of erosion and sediment control best management practices. Please note that any future earth disturbance or development at your site after cleanup is completed may require either approvals or permits from the appropriate county soil conservation district. Therefore,

you should contact the conservation district before engaging in any such activities. For more information regarding this topic, visit www.dep.pa.gov, Search 'Stormwater Management'.

Surface Water Discharge

Surface water discharges from sites undergoing Act 2 cleanups may be considered point or nonpoint sources. Point source discharges to surface water include, as examples, leachate discharge from a disposal unit, or, runoff from contaminated site discharges through a storm sewer. Discharges such as these are subject to National Pollutant Discharge Elimination System (NPDES) requirements, and as such may require a permit. Additionally, Act 2 requires that any site undergoing cleanup via the Statewide health or site-specific standard also demonstrate compliance with surface water quality criteria when a nonpoint source discharge, such as contaminated groundwater, discharges into surface water. More information regarding these programs may be found at the DEP's website or through your site's assigned Project Manager.

Sewage Facilities Program

The redevelopment of Act 2 sites after completion of cleanup activities may require you to investigate sewage planning considerations. For example, when site utilization is changed from industrial use to residential use as a result of Act 2 implementation, the sewage facilities planning for the property will require analysis/revision. Act 537, Sewage Facilities Program, contains provisions to enable proper municipal planning and permitting for current and future utilization of sewage facilities. For more information, visit www.dep.pa.gov, Search 'Act 537 Sewage Facilities Program'.

Water Well Abandonment

Abandoned wells must be reported on required forms to the PA Department of Conservation and Natural Resources (DCNR), Bureau of Topographic and Geologic Survey (BTGS). Information is available on the DCNR website, www.dcnr.state.pa.us, select Geology, and on the Geologic Survey portion of the website, under 'Groundwater' and 'Private Water Wells' section.

If available, the original driller's log should be included along with the details of the well abandonment procedure. A photograph should be taken of the site, and a reference map should be made to locate the abandoned well. **We recommend that you identify the exact location by GPS** (It also may be appropriate to survey the exact location of the well). If a permit was issued for the well installation (e.g. by a local agency or County Health Department), please provide a copy of your BTGS submission to the issuing agency and to this office.

Oil and Gas Well Site Restoration

If the site specified for remediation is considered to be part of a well site as that term is defined by Section 603a(d) of the Oil and Gas Act, you must ensure restoration of the area under Section 206 of the Oil and Gas Act, 58 P.S. § 601.206. The Department considers a well site to be restored under Section 206 when the disturbed or impacted area is returned to its approximate original contours and restored to conditions that support the same potential uses of the land that existed prior to the spill or release, including the vegetation of those areas. The restored area should be capable of supporting the type of vegetation that was present before the release.