



Pennsylvania
Department of Environmental Protection

June 18, 2025

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

Re: Disapproval of Remedial Investigation Report and Cleanup Plan
Alliance 51st Street
eFACTS PF No. 855927
1646 South 51st Street
City and County of Philadelphia

Dear Mr. Ryan:

The Department of Environmental Protection (DEP) has reviewed the March 2025 document titled “Act 2 Remedial Investigation Report and Cleanup Plan” for the property referenced above. The report was prepared by Arcadis U.S., Inc. and submitted to DEP in accordance with the Land Recycling and Environmental Remediation Standards Act (Act 2), and it constitutes a remedial investigation report and cleanup plan as defined in Chapter 3.

DEP notes the following deficiencies in both the Remedial Investigation Report (RIR) and Cleanup Plan (CP) and disapproves them in accordance with the provisions of Act 2:

1. All analytical data was not included or discussed in the RIR. Temporary well data from June 2024 was not included in the tables or figures. The results were not discussed in the RIR and the data were only included in email correspondence included in Appendix A. 25 Pa. Code Section 250.408(c)
2. The fate and transport modeling information provided is not conservative for metals migration and it is unknown if migration in groundwater is sufficiently known as required by 25 Pa. Code Sections 250.404(a), 250.408(a) and 250.408(b)(2) and (3). Guidance documents were not followed when modeling metals using Quick Domenico. Additional justification for input parameters used should be provided for the metals. Alternatively, additional downgradient wells along the northeastern property boundary could be installed in order to complete a robust qualitative fate and transport analysis instead of modeling. In addition, the projected plumes need to be evaluated to appropriate risk-based screening values, such as USEPA regional screening levels (RSLs) for the site-specific standard. Estimated plume maps should be provided showing entire plume areas and not just straight lines from source wells.
3. The full horizontal extent of hexavalent chromium in groundwater to the east and south is not known as required by 25 Pa. Code Sections 250.408(b)(2) and (3), and 250.408(e). Well locations downgradient of MW-7 will help determine if impacts are migrating to

the northeast as is depicted on Figure 12 and would help replace the need for modeling. Well locations south of the property boundary will help determine if impacts extend to the south onto Bartram's Garden property.

4. Information concerning the evaluation of remedial alternatives discussed in Section 9.4 must be provided. The section lists alternative remedies, but details concerning why other alternatives were not chosen are missing. 25 Pa. Code Section 250.410(a)
5. Additional cleanup plan details are required in order to properly evaluate the selected remedies (25 Pa. Code Section 250.410(b)(2)).
 - a. Details concerning the construction of caps over landscaped areas are absent.
 - b. Details and plans for the proposed sub-slab depressurization system are absent.
6. Section 9.7 states that groundwater at the site will not be used for farming, irrigation, or potable purposes. However, this is inadequate for pathway elimination. All potential future uses of groundwater need to be prohibited. 25 Pa. Code Section 250.410(a) and (b)(3)
7. The use of medium-specific concentrations (MSCs) is not appropriate as cleanup standards under the site-specific standard. Appropriate risk-based criteria must be used to establish appropriate remedies. 25 Pa. Code Sections 250.402(a) and (b), 250.404(a), 250.405, 250.410(a) and (b)(3)
8. Proposed post remediation care plan details need to be revised or clarified, as required by 25 Pa. Code Section 250.410(b)(5). Figure 16 depicts that the entire site is planned to be capped. However, Section 9.7 states that only the areas of PADEP Non-Residential Soil MSC exceedances in soil will be capped and maintained. All areas that are designated as caps will need to be inspected and maintained. Additional proposed details concerning inspection frequency, record keeping, and maintenance should be included.

In order for your site to be in compliance with applicable requirements of Act 2, these items must be addressed. DEP is willing to work with you to develop an approvable submittal. ***Please note that the required fee(s) must be repaid and public notification must be repeated for all new submittals.***

Please feel free to contact Matthew Sabetta by email at msabetta@pa.gov or by telephone at 484.250.5788 if you have any questions regarding this correspondence.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800.654.5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://www.ehb.pa.gov> or by contacting the Secretary to the Board at 717.787.3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717.787.3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

Sincerely,

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

cc: Mr. Brunt (Arcadis U.S., Inc.)
City of Philadelphia
Mr. Reitano, Esq.
Ms. Costello, Esq.
Mr. Devan, P.G.
Mr. Sabetta, P.G.
Ms. Henderson