



1515 Market Street, Suite 920
Philadelphia, PA 19102
267.402.3400

March 30, 2020
Via E-mail: jeduncan@pa.gov

Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Attention: Jesse Duncan, Project Manager
Phone: (484) 250-5826
Email: jeduncan@pa.gov

Re: NPDES Construction NOI/Application Number:
PAD510058
1 Red Lion Road
Philadelphia, PA 19115
Bohler Project No. PP193123

Dear Jesse:

With regard to the above referenced project, enclosed please find the following for your review and approval:

- An electronic copy of NPDES Phase II Plans dated 12/18/2019, last revised 03/20/2020;
- An electronic copy of the revised NOI;
- An electronic copy of the revised E&S Module 1;
- An electronic copy of the revised Antidegradation Module;
- An electronic copy of the revised Water Quality Worksheet;
- An electronic copy of the Rate and Volume Worksheets;
- An electronic copy of PCSM Module 2;
- An electronic copy of the Supporting Materials for the Environmental Responses;
- An electronic copy of the most recent PWD Technical response letter for coordination purposes.

Below please find an itemized response to the e-mail received from your Jesse Duncan with your office, dated March 19, 2020. Our responses are noted in **bold**.

Technical Deficiencies from DEP

1. Please provide the following environmental due diligence items:
 - a. If site-specific standards are being employed for this project, please list the standard being used for each applicable parameter and provide evidence of approval from DEP's ECB program.

Response: Please refer to the attached tables and DEP Act 2 approval letters referencing attainment of groundwater and soil standards.

In regards to groundwater, site-specific standard numeric values were established for parameters listed in Table 1 Numerical Site-Specific Standards in Groundwater (attached), presented in the Ground Water Final Report for the Transit America Inc. Red Lion Road Facility, December 1999 and in the DEP letter, Re: Act 2 – Approval of Report, dated March 10, 2000. The Site-Specific Standard was attained using pathway elimination, including institutional controls restricting groundwater use. The institutional control is documented in a Special Warranty Deed established in 2001. With respect to groundwater, DEP also approved a Supplemental Groundwater Final Report, dated June 2000 by letter dated September 8, 2000, and a Revised Cleanup Plan, December 2002 by letter dated January 16, 2003.

In regards to soil, parameters listed on Table 1, Transit America Inc., Regulated Substances in Soil Meeting Act 2 Standards were attained using a combination of residential Statewide Health Standards, non-residential Statewide Health Standards, and Site-Specific Standards. Parameters attained using the Site-Specific Standard were identified within the Executive Summary of the Final Report for Soils for the Transit America Inc. Red Lion Road Facility, June 2000 and in prior Act 2 regulatory submittals and are listed in the attached table: Parameters Attaining Site Specific Standards for Soil. The DEP approved attainment of soil standards by letter, Re: ECP-Special Projects-Act 2, dated August 14, 2000. Attainment for parameters using the Site-Specific Standards was completed using a combination of engineering and institution controls (i.e. capping soil impacts and requiring a Health and Safety Plan when working within environmentally sensitive areas). The engineering and institutional controls are documented in a Special Warranty Deed established in 2001.

- b. Demonstrate that the E&S BMPs being utilized are appropriate for proper on-site containment of all parameters which exceed the soil-to-groundwater thresholds (e.g., please discuss the appropriateness of the proposed E&S controls for containing any water-soluble parameters present at the site in concentrations above their respective thresholds). Include any modifications/deviations made to standard E&S BMPs to prevent contaminant transport on the applicable detail(s) on the E&S plan drawings.

Response: Parameters attaining the Site-Specific Standard were evaluated in consideration of creating adverse conditions during proposed construction activities. Results of this evaluation, discussed below, indicate that the planned E&S BMPs are appropriate and additional E&S controls (beyond what was included in the submitted application) are not necessary.

Volatile Organic Compounds (VOCs)

The following VOCs have been documented in soil in excess of the soil to groundwater numeric values subsequent to source removal: tetrachloroethene (PCE), cis- and trans-1,1-dichloroethenes, ethylbenzene, toluene, benzene, vinyl chloride, total xylenes, and trichlorobenzene. These VOCs are reportedly located in saturated soils at depths exceeding 10 feet below grade beneath a former subsurface disposal area located in the southwest portion of the site. Due to the depth of VOC impacts, which is below the groundwater table, these soils are not anticipated to be encountered during construction.

Arsenic

Arsenic was previously identified above its respective soil to groundwater numeric value. As identified on Sheet No. 02, Phase 1 Environmental Plan, arsenic impacted soil is located outside of the deed restricted area and was capped with clean fill. This area is primarily located outside of the limit of disturbance of this Phase 1 NPDES application, and the area within the limit of disturbance is not planned to be excavated.

Polychlorinated Biphenyls (PCBs)

PCBs have been identified above respective soil to groundwater numeric value in soils and within abandoned in place concrete from former buildings slabs. Prior remedial efforts to address PCB impacts included the installation of protective surface engineering controls (capping) to eliminate direct contact exposure pathways to PCB impacts. In addition, prior remedial efforts to address PCB impacts included evaluating leachability, and it was concluded in the Remedial Investigation Report, March 1998 that migration of PCBs to groundwater was not of concern.

The planned construction work has been designed to minimize impacts to the constructed engineering control to the extent practicable. This work will include the placement of substantial thicknesses of additional clean fill site-wide above the existing cap to provide for a

working subgrade of clean fill for subsequent foundation and utility excavations. The existing topsoil layer will be removed and reused on-site for landscaped areas.

Phase I work including the removal of the topsoil layer and placement of compact clean fill to support future construction will not require point source discharges of stormwater. Appropriate erosion and sediment control BMPs have been designed that will be installed to retain any sediment that would be disturbed during this earthmoving effort. In addition, construction work and management of soils will be governed by the Soil Management Plan, January 2020 submitted with the NPDES application. This Soil Management Plan has additional BMPs for the management of PCB-containing soils, should they be encountered.

- c. Please verify if activities at this site are following Act 2. If so, it is recommended that the following notes be added to the plan drawings:
- i. The work being performed at this site was authorized under the PA DEP Act 2 Land Recycling program and any future work or disturbance to this area should be authorized by the same program prior to commencing.
 - ii. For contaminated sites proposing to attain remediation standard(s) outlined in the Land Recycling and Environmental Remediation Standards Act (Act 2) – the permittee is responsible for assuring that the remediation follows all reports/plans/procedures approved by the Department's Environmental Cleanup and Brownfields (ECB) Program. Groundwater exposure pathways and contaminated soils should be properly managed to prevent groundwater pollution. The regional ECB program should be contacted at 484.250.5960 for any remediation questions. [Section 102.11(a)(1)]

Response: As indicated above, attainment of standards through the Act 2 program was previously completed. Activities at the site are utilizing engineering and institutional controls that were previously approved by the DEP. The Applicant believes that the existing notes included on the plans and the associated Soil Management Plan maintain the protectiveness of the previously-approved remedial alternatives.

2. Since the "Stormwater Discharge Information" section of the application indicates that the receiving waters are impaired (for siltation, suspended solids, turbidity, water/flow variability, flow modifications/alterations, or nutrients), all E&S BMPs should be ABACT. As such, please note that the rock construction entrance will need to include a wash rack (per the E&S Manual). [Section 102.2(b)]

Response: The construction entrance and associated detail has been revised on the plans to be ABACT compliant. The detail utilized is from the DEP Alternative E&S BMPs list, approved 12/01/2016. The E&S Module has also been revised accordingly to indicate the use of an alternative BMP.

3. In the "Stormwater Discharge Information" section of the NOI, please provide latitude / longitude coordinates (in decimal degrees with at least five digits to the right of the decimal place per the application instructions). In addition, please identify the locations of the discharge points on the plan drawings. [Section 102.6(a)(1) and 102.4(b)(5)(ix)]

Response: The discharge information section of the NOI has been revised to include latitude and longitude coordinates for the location where the Sandmeyer Lane and Red Lion Road sewer systems converge. A label has been added to the E&S plans showing this location (Discharge Point 001).

4. Table 1 of E&S Module 1 was not completed. Please provide all applicable information. [Section 102.6(a)(1)]

Response: Table 1 of E&S Module is only applicable to PAG-01 permit, and not applicable to this application.

5. On E&S Sheet No. 02, it appears that the proposed compost filter socks do not remain parallel to elevation contours in several places. Please justify what is currently proposed or make any appropriate revisions to the perimeter E&S control configuration to ensure proper functionality. [Section 102.4(b)(5)(ix)]

Response: As discussed with the reviewer, the filter socks have been placed around the perimeter of the site to prevent sediment from leaving the site. Calculations have been provided in the E&S report demonstrating the sizes are adequate based on upslope lengths and slopes. The areas where the socks are not parallel to the contours are not anticipated to receive excessive concentrations of runoff.

6. Please complete and provide PCSM Module 2. [Section 102.8(g)]

Response: PCSM Module 2 has been completed and is included with this resubmission.

7. Please provide any PCSM plan drawings and calculations that are being provided to PWD for review. [Section 102.8]

Response: PWD was sent the same set of plans and details that was submitted to PADEP for this phase of the application. The Phase II concept shows what the stormwater management intent is for the future phase.

8. Please revise the PCSM Spreadsheet, Quality Worksheet to indicate the appropriate values for TSS where they are currently missing. [Section 102.8(g)]

Response: The PCSM Quality Worksheet has been revised to provide the values shown as “###” on the previously submitted Worksheet.

9. Regarding Antidegradation Module 3, please provide an explanation for why each BMP not checked was not utilized. [Section 102.8(h)]

Response: Antidegradation Module 3 has been revised to provide justifications for why none of the non-discharge BMPs were selected.

10. Following the recommendations of the E&S Manual, please provide additional plan drawings as necessary (e.g., four additional sheets for each quadrant of the site), so that the scale is no greater than 50 feet per inch. [Section 102.11(a)(2)]

Response: The plan set was revised to include sheets at 1” = 40’ in addition to the overall sheets that were previously submitted.

Upon review, should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,

BOHLER ENGINEERING PA, LLC



Michael Roth, E.I.T., Senior Design Engineer