

North Yard Hazardous Waste Container Storage Area Closure

Public Meeting - October 12, 2021

Questions & Answers

This list shows all questions received in connection with the virtual public meeting held on October 12 to discuss the North Yard Hazardous Waste Container Storage Area closure. This responsiveness summary will be made available at <https://www.thebellwetherdistrict.com/community>.

Questions are copied directly as asked with spelling errors corrected.

Q1: How many people are participating in this meeting?

A: 67

Q2: What does a “release” refer to? What types of things are typically “released” when these occur?

A: A “release” means spilling or leaking of an oil or chemical from the container where the oil or chemical is intentionally stored to the underlying soil and groundwater. In the hazardous waste context, the Philadelphia Energy Solutions (PES) facility has permitted areas where hazardous waste is stored before it is managed or disposed that are designed to prevent releases. Those hazardous waste areas are permitted by the Pennsylvania Department of Environmental Protection (PADEP) and are built on top of a large piece of concrete, which is called the “pad.” The pad is designed to prevent waste stored on top of the pad from reaching the ground below it.

Q3: Has the area, including the upper levels of soils, surrounding the concrete pads been sampled for post-2012 contamination?

A: There is sampling planned as part of the closure of the North Yard Hazardous Waste Container Storage Area. The sampling will be done pursuant to a sampling plan that will be approved by PADEP. The sampling results will provide information about contaminant levels in soil in this area.

Q4: 12 is a very tiny number of soil sampling points for such an enormous site, making it very easy to miss unknown historical areas of contamination. How did you arrive at this number?

A: The sampling scope discussed during the meeting is only for the North Yard Hazardous Waste Container Storage Area, which is an area that is approximately 17,000 square feet (or, less than half an acre). The North Yard Hazardous Waste Container Storage Area is permitted by PADEP and is built on top of a large piece of concrete, which is called the “pad.” The pad is designed to prevent waste stored on top of the pad from reaching the ground below it. The initial sampling scope for this area is intentionally focused on locations where it is more likely that a release to the environment may have occurred based upon the pad’s construction and use. If the initial sampling results identify a need to do additional sampling, additional sampling will be conducted to understand how much contamination is present.

Q5: This site has been active for over 150 years. Couldn’t there be contamination below these pads that existed prior to the construction of the pads? Is this being sampled for?

A: See answer to Question 6.

Q6: Are there any cracks or breaks in the concrete? Was the concrete pad ever replaced and how old is it?

A: A visual inspection of the concrete pad is an important part of this process. The facility's inspection identified areas that have damaged concrete, and we will intentionally sample under those areas. The North Yard Hazardous Waste Container Storage Area has been in place since the late 1990s. The prior owner has done (and continues to do) significant sampling and characterization throughout the entire property to understand historic conditions.

Q7: Does Hilco have an estimate of how many soil samples will be taken? Or does Hilco have an estimate of how many sites of visibly damaged concrete there are on the site?

A: See answers to Questions 4 and 6. The PADEP-approved sampling plan will govern how many samples are taken.

Q8: Are there any areas underneath or in the areas near the pads where the soil extends more than 8 feet before it becomes saturated? Rather than sampling to 8 feet, why not sample the entire length of the soil, so it if goes down 12 feet before it hits water, all 12 feet will be sampled.

A: The PADEP-approved sampling plan will govern sampling parameters, including the depths to which soil sampling is required. If the initial sampling results identify a need to do additional sampling, additional sampling will be conducted to understand how much contamination is present.

Q9: Is the diagram of sample locations shown tonight the latest? revised per PADEP? Why were all the samples (except one) located only on one half of the site?

A: The Figure shown in the October 12, 2021 meeting was the latest version of the diagram, though the number of samples and locations may be updated in the future based on input from PADEP. The sampling will start only after PADEP has approved the sampling plan.

Q10: What is the total budget for the development plan?

A: HRP continues to refine the master plan and is committed to a significant investment in decommissioning and demolition and is focused on transforming the site into Philly's new home for e-commerce, life sciences, and logistics leaders.

Q11: What do you think will go on the site after closure?

A: After the North Yard Hazardous Waste Container Storage Area is closed, that area will be re-purposed for development as part of the larger Bellwether District development. The Bellwether District will be Philly's new home for e-commerce, life sciences, and logistics leaders. It will be a global model of sustainable development and design. It will connect the world's seas, skies, rails, and roads to the people and businesses of Philadelphia.

Q12: What is HILCO's timeline for reentering Act 2 for the 2019 release? I request that you provide the timeline and all the documents to the public for comment as soon as they are developed, even if the public involvement is not required under Act 2. This should occur before finalization of the plan, please.

A: Information relating to this 2019 release will be posted to The Bellwether District website (link: <https://www.thebellwetherdistrict.com/community>). The 2019 release is not related to the North Yard Hazardous Waste Container Storage Area that was the subject of the October 12, 2021 meeting.

Q13: Is there a waste containment area at the West Yard (AOI-10)?

A: No.

Q14: In addition to the 12 borings, will you extend additional sampling to sample the areas surrounding the pads that you indicated had not been sampled for post-2012 contamination? I think that if a spill occurred, it probably not just on top of the concrete pad.

A: See answer to Question 4. All sampling in connection with the North Yard Hazardous Waste Container Storage Area will be governed by a PADEP-approved sampling plan.

Q15: What hazardous wastes are still being stored on site? Do you have a list of which specific HW were previously stored on site? Are you testing for all potential hazard wastes?

A: Nothing is currently being stored on the North Yard Hazardous Waste Container Storage Area (nor will it be used for hazardous waste storage at any time in the future, as it will be permanently closed). During its operational life, the North Yard Hazardous Waste Container Storage Area was permitted for refinery listed wastes and a few characteristic wastes. Recently, the pad was used primarily to store spent carbon and spent hydrotreating catalyst. The list of chemicals for the sampling plan includes chemicals identified by EPA that may be present in the permitted wastes, in addition to chemicals typically present and tested for as part of remedial investigations at the former refinery.

As to the rest of the facility, most hazardous wastes have been removed and properly disposed off-site. Some waste is still being collected and managed for recycling or disposal such as spent carbon and universal wastes (spent bulbs, batteries). Some unused chemicals (e.g., acids or caustics) may become hazardous waste if they cannot be used (in which case they will be managed as hazardous waste).

In addition to the above questions, the following comments were also received, which will be reviewed with PADEP in connection with PADEP's review and approval of the facility's request for closure of the North Yard Hazardous Waste Container Storage Area:

- **Comment 1:** Visual observations don't seem very scientific given the site's long history.
- **Comment 2:** At Evergreen's last meeting they very publicly said that whenever they dig into soil they find pollutants that were previously unknown, it's very clear that we do not have good information about what is in this soil.
- **Comment 3:** When sampling in this area (around and under the pad) please release all the sampling data to the public.