

Summary of Remedial Investigation Report and Cleanup Plan for Soils Only

**Former 51st Street Terminal
1630-1646 South 51st Street
Philadelphia, Pennsylvania**

September 4, 2025

On behalf of Alliance 51st Street LLC (Alliance), Arcadis U.S., Inc. (Arcadis) submitted the Remedial Investigation Report and Cleanup Plan for Soils Only (RIR/Cleanup Plan) for the Former 51st Street Terminal, Facility ID: 51-10420 (the 'Site'), located at 1630-1646 South 51st Street in Philadelphia, Pennsylvania on September 4, 2025. The RIR/Cleanup Plan for Soils Only summarizes investigations completed on soil at the Site and presents Alliance's remediation approach to address site soils in compliance with Chapter 250 of Title 25 of the Pennsylvania Code, which relates to the administration of Pennsylvania's Land Recycling Program (known as the Voluntary Cleanup Program: Act 2), and Pennsylvania Department of Environmental Protection (PADEP) guidance.

The RIR/Cleanup Plan for Soils Only was prepared in response to PADEP's June 18, 2025 disapproval of the March 2025 RIR/Cleanup Plan, as well as the PADEP July 17, 2025 letter of technical deficiency on the April 21, 2025 Human Health Risk Assessment – Offsite Soils Adjacent to Former 51st Street Terminal (HHRA), and the August 6, 2025 virtual meeting between Alliance and the PADEP. Groundwater investigations are ongoing, and groundwater will be further evaluated in the forthcoming RIR/Cleanup Plan for Groundwater.

The Site historically contained aboveground storage tanks (ASTs) that held petroleum products. Historical use of the Site has been determined to be the source of petroleum-related constituents present in soil and groundwater. In 2021, all ASTs were emptied and dismantled by PBF Logistics, and their contents and transfer lines were removed from the Site. During the closure of the ASTs, PBF Logistics identified a release of an unknown quantity of petroleum on August 16, 2021, and notified PADEP of the release on August 17, 2021.

In December 2021, Alliance purchased the Site, and soil and groundwater investigations were conducted to identify the site-related constituents of concern (COCs) that were present in soil and groundwater at concentrations above PADEP Non-Residential statewide health standards. Soil, groundwater, and soil gas sampling was conducted at the Site over the next two years to delineate the detected COCs. During this time, plan approval for the Site was obtained for the construction of a 165,000 square foot warehouse. As a result of a change in both financial and warehouse market conditions, the redevelopment is currently paused, and Alliance is seeking lease interest for the Site.

Soil samples results have been compared to the PADEP statewide health standards, known as Medium-Specific Concentrations (MSCs). Soil sample results showed concentrations of benzene, naphthalene, bis(2-chloroethyl)ether, biphenyl, lead, total chromium, and hexavalent

chromium greater than their Soil MSCs. Soil exceedances have been delineated onsite and soils with COCs above MSCs will be relocated to under the future building as part of construction along with using uncompacted fill. Soils will be capped with asphalt or concrete, or landscaped areas with two feet of fill over snow fence, as necessary to protect future receptors.

Act 2 ecological screening evaluations confirmed no open exposure pathways to ecological receptors related to soil. Groundwater will be further evaluated in the RIR/Cleanup Plan for Groundwater.

Soil gas was evaluated through the comparison of soil, groundwater, and soil gas sampling results to the PADEP Vapor Intrusion Screening Values (SVs). Soil gas sampling identified benzene in soil gas sample SG-5 at a detected concentration greater than the SV. As part of the warehouse construction during Site redevelopment, a passive sub-slab depressurization system (SSDS) will be installed as a proactive vapor intrusion mitigation measure to eliminate potential vapor intrusion into the future building to protect onsite workers. There are no other receptors for soil gas.

In April 2024, yellow-colored material was observed adjacent to the Site near the Bartram's Garden Mile Trail as was reported to PADEP by the Philadelphia Water Department (PWD). This prompted numerous phases of sampling of soil, standing water, and surface water. Samples were collected on the Site property, along Bartram's Garden Mile Trail, and in the Schuylkill River. Detections of hexavalent chromium were present above PADEP residential statewide health standards along the trail. Alliance remediated areas of Bartram's Garden Mile Trail with any hexavalent chromium detection by shoveling and scraping, and post-remediation soil sampling results were below the standards and, in many cases, not detected. Following the removal activities, further sampling was performed by PADEP which showed detections along the trail. Both PADEP and Alliance concluded a number of the sample locations are not associated with historical Site operations, but rather with historical filling activities on the Site and in the surrounding area, the deposition of Schuylkill River sediments, as well as tidal influences from the river. The HHRA was completed to evaluate hexavalent chromium at specified locations along Bartram's Garden Mile Trail. The HHRA will be re-submitted to PADEP under separate cover but imminently, within the 60-day timeframe allotted to address PADEP comments on it (provided in Appendix A).

PADEP has 90 days to approve or provide comment on the RIR/Cleanup Plan for Soils. Upon PADEP approval of the RIR/Cleanup Plan and HHRA, soils will be closed in accordance with Act 2 and groundwater will be the focus of future investigations.

Following additional groundwater evaluations, submittal and approval of the future RIR/Cleanup Plan for Groundwater, and installation and confirmed effectiveness of the caps and SSDS, Arcadis will prepare and submit a Final Report to PADEP that will propose the recording of a deed restriction, in the form of the PADEP Environmental Covenant (EC).

Pursuant to the proposed EC, the Site will be subject to the following restrictions that owners and tenants must abide by:

- The Site will remain as non-residential property.
- Groundwater at the Site will not be used for any purposes.

- The entire site will be capped by impermeable surfaces (asphalt/concrete), or landscaped areas with 2 feet of fill over snow fence. Caps and landscaped areas will be routinely inspected and maintained pursuant to PADEP requirements.
- A Materials Management Plan will be followed for future Site work that breaks ground, to protect construction workers from exposure to COCs in site media.
- The vapor mitigation system (SSDS) for the proposed building will require maintenance and inspections, and other future buildings will require a vapor intrusion evaluation.

The Site will continue to be managed and inspected pursuant to PADEP requirements until it is developed.

