

ALLIANCE 51ST STREET, LLC

ACT 2 PUBLIC MEETING MAY 22, 2025

51st Street Site
1646 South 51st Street
Philadelphia, PA

Introductions

- Eric Carlson, Alliance – Developer/Owner
- Hercules Grigos, Klehr Harrison Harvey Branzburg, LLC – Alliance Counsel
- Anthony Reitano, Herold Law – Alliance Counsel
- Larry Brunt, Arcadis – Alliance Environmental Consultant

Who is Alliance?

- Founded in 2009.
- Commercial real estate firm headquartered in Bryn Mawr.
- Active focus in residential and industrial.
- Primary markets are Greater Philadelphia and South Florida.
- Successfully worked through the voluntary Act 2 process in PA numerous times.
- Regularly work with PADEP.
 - Currently, Alliance has 4 active Act 2 projects.
 - Completed at least 3 cases in the last 3 years.

Public Participation

- As provided in the Act 2 law, the City of Philadelphia Health Department submitted a letter to Alliance requesting a Public Involvement Plan.
- A Public Involvement Plan (PIP) includes a public meeting which is what we are holding this evening.
- As part of the Act 2 law, notifications are posted in the newspaper and via e-mail when any report is submitted to PADEP.
- Alliance has established its own website for all documents submitted to PADEP so they are readily available to the public: <https://Alliance51stStreet.com>
- This process allows the public to submit comments to Alliance which we must then review and submit a response to PADEP.
- The PIP and the process encourages transparency.
- Tonight, we will tell you what we know about the Site, the ongoing efforts to control the Site, and the remediation plan and plans for redevelopment.

The Site

- Alliance implemented Site controls which have been effective and will be maintained until redevelopment occurs.
- Alliance has not caused or contributed to any of the contamination found at the Site.
- Alliance voluntarily entered the PA Act 2 Program to remediate the Site and has complied with every agency request.
- The chromium contamination has been present for close to if not longer than 100 years.
- Alliance has controlled the chromium contamination.
- Redevelopment is ready to commence once market conditions allow and a tenant/user is found.

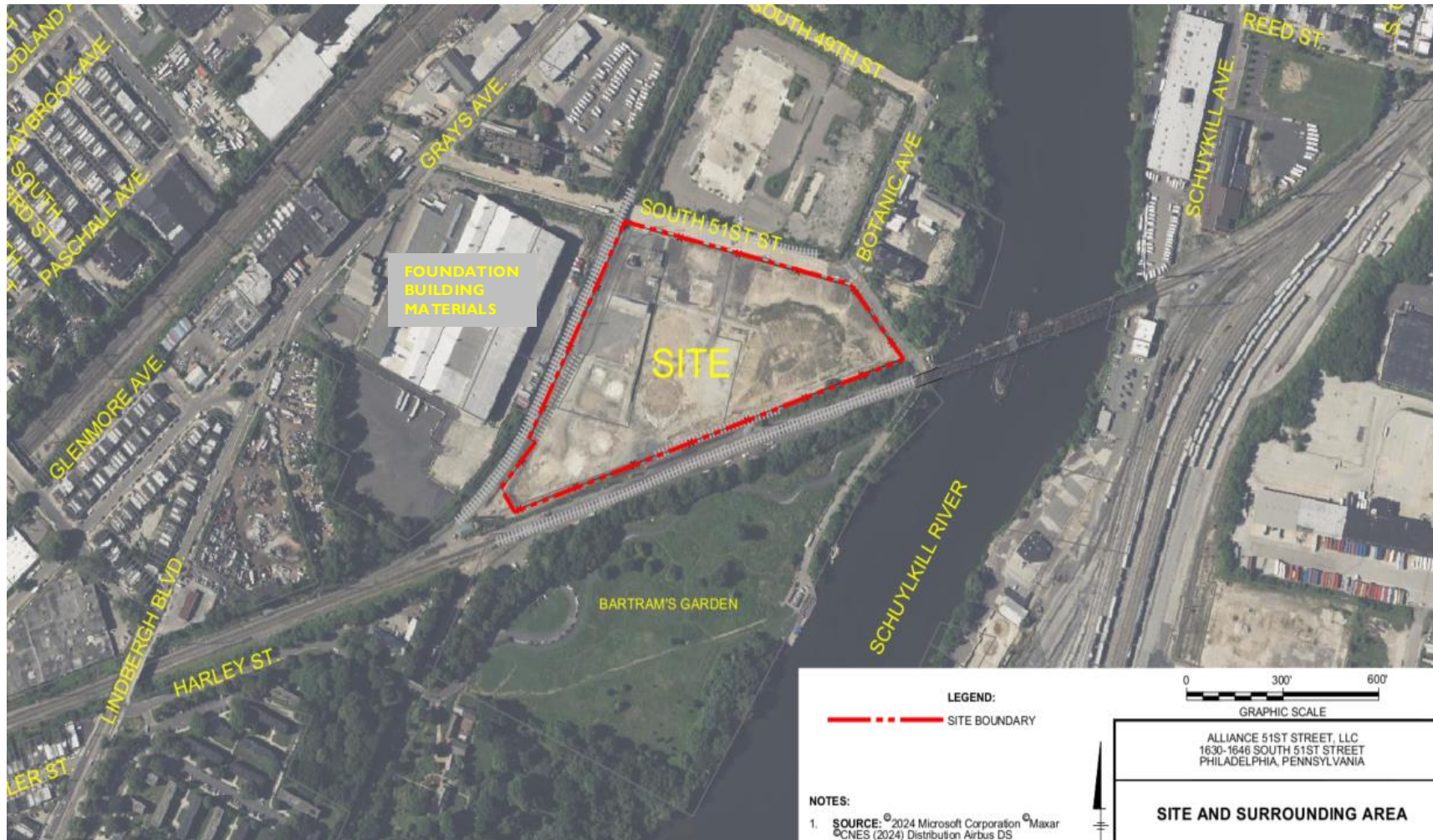
Agenda

- Site Location, History, and Status
- Contaminants Identified at the Site
- Contaminant Exposure Elimination
- Remediation Plans
- Protective Measures Pre-Development
- Protective Measures Post-Development
- Response to thirty-day comments
- Project Schedule
- Questions and Discussion

Background

- Alliance acquired the Site in December 2021.
- Sampling was performed prior to the acquisition focusing on the historical storage terminal use.
- Based upon contaminants identified prior to the acquisition, Alliance entered the Site into PADEP's Voluntary Remediation Program (Act 2) in February 2022, through submittal of a Notice of Intent to Remediate (NIR).
- A revised NIR was submitted in July 2024 that included additional compounds, including chromium.
- Alliance has not caused or contributed to any of the contamination found at the Site. It all pre-dates the acquisition.
- The chromium contamination has been present for close to if not longer than 100 years and colored runoff was identified by others leaving the site before Alliance purchased the site.
- During the revised NIR Public Comment period, the City of Philadelphia requested a Public Meeting.
- An amended Remedial Investigation Report and Cleanup Plan (RIR/CP) was submitted to PADEP in March 2025 that characterizes and delineates compounds found during environmental investigations conducted onsite both before and after the acquisition.
- A Human Health Risk Assessment (HHRA) was submitted in April 2025 to address offsite soils.
- Purpose of meeting is to summarize the findings of the RIR/CP and HHRA, and answer questions from the public related to the Act 2 Site cleanup.

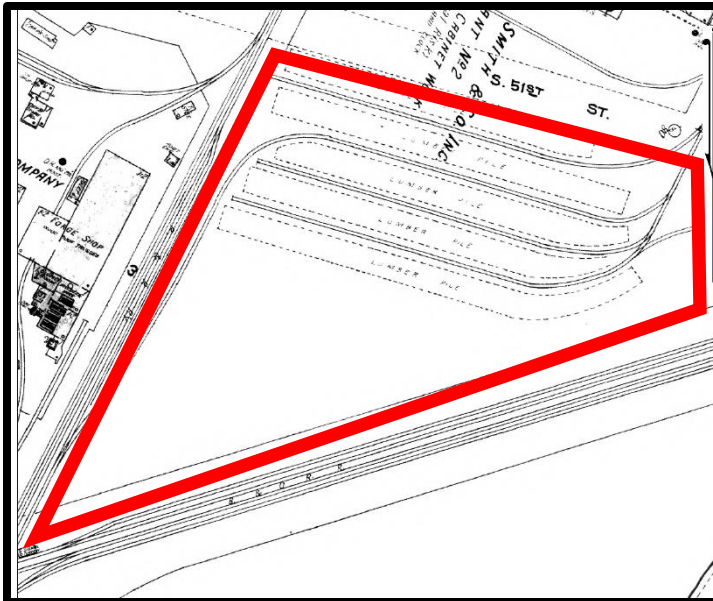
Site and Surrounding Area



Site History

- In the early 1900s, industrial fill was spread across the Site.
- Prior to 1923, property was used for the storage of lumber by a neighboring cabinet manufacturer.
- Between 1923 and 1945, a 45,000-square-foot building was constructed in the northeast portion of the Site for the manufacture of cardboard containers.
- Between 1951 and 1975, 10 ASTs were constructed as part of the operations of the Site as a fuel oil terminal by Allied Oil Co. and later, Hess Oil & Chemical Corporation.

1923 Sanborn Map



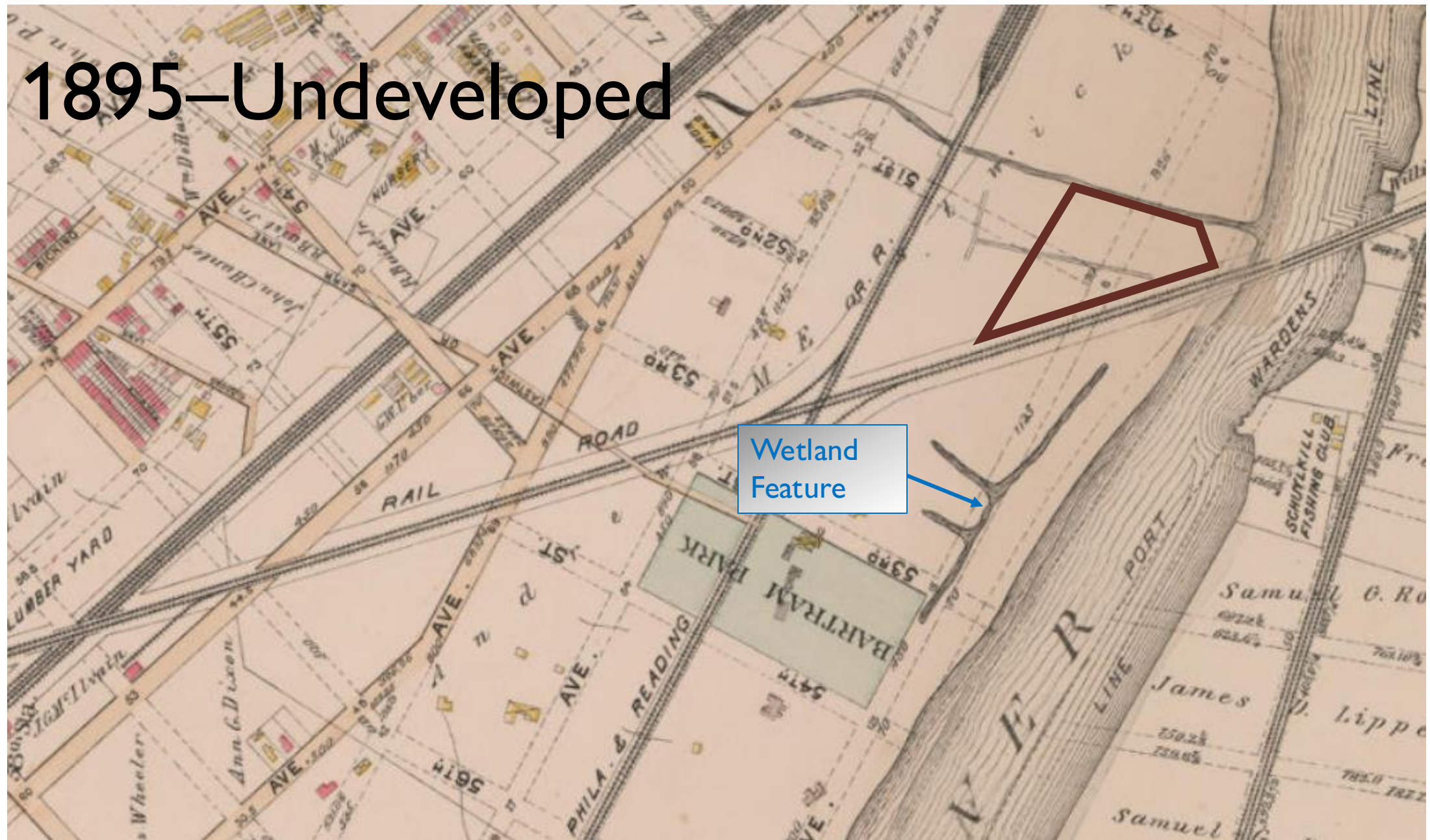
1945 Aerial Image



1975 Aerial Image



1895–Undeveloped

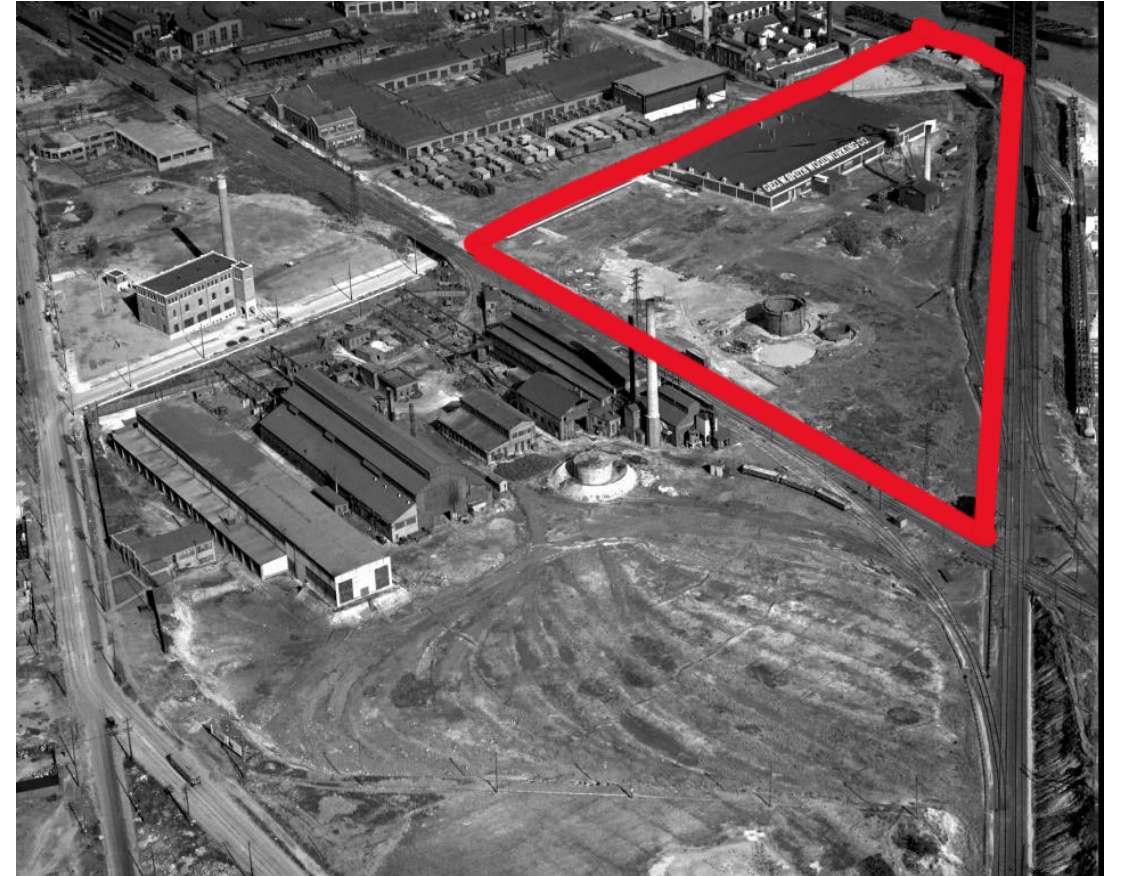
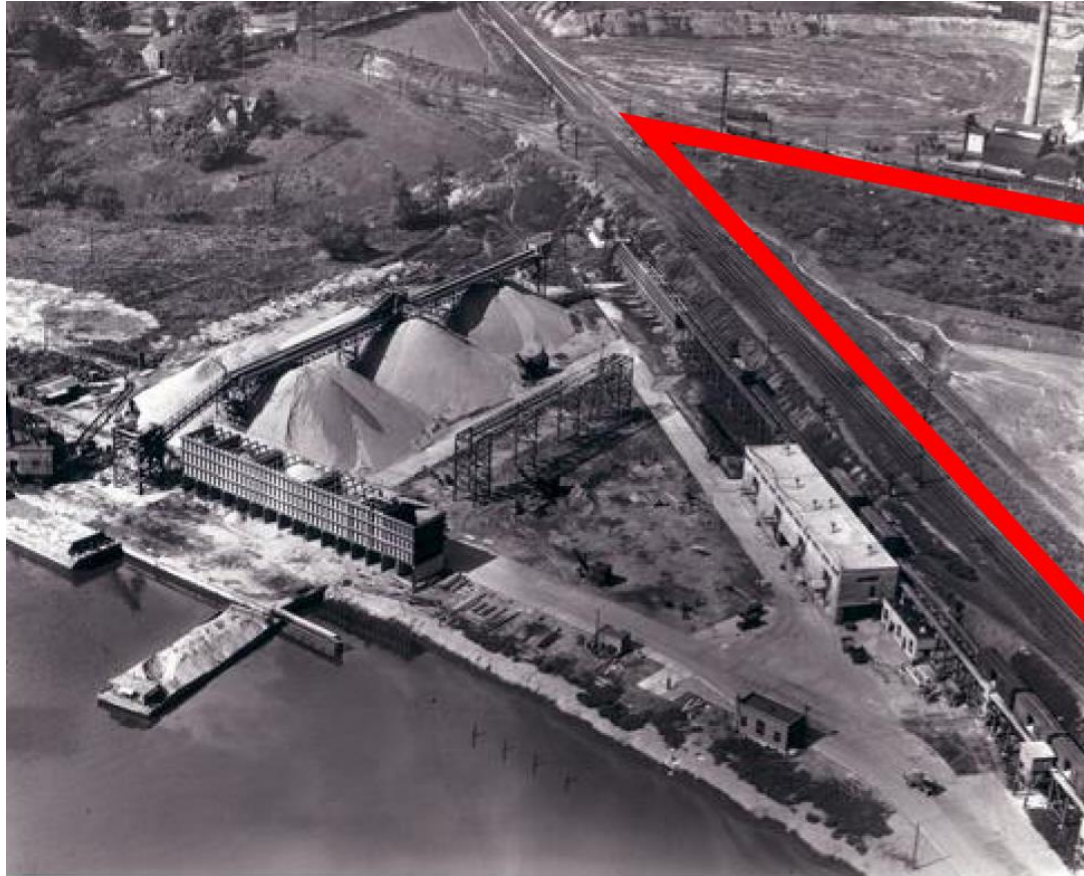


1910-Undeveloped

Wetlands Feature No Longer Present (Filled in)



1929 Aerial Photographs



Site History (cont.)

- The Site was sold in 2009 to Plains Product Terminals LLC.
- In 2016, PBF Logistics Products Terminals LLC (PBF Logistics) acquired the Site.
- In 2021, PBF Logistics closed the ASTs with notice to PADEP. As part of the closure activities, PBF Logistics removed all liquids and sludge from the tanks and lines and removed the ASTs and lines.

2010 Aerial Image



2017 Aerial Image



2023 Aerial Image



The Site was used as a petroleum products terminal from 1951 to approximately 2021

CURRENT AERIAL IMAGE

An aerial photograph of a large-scale construction or remediation project. The central area is a vast, flat expanse of brown, disturbed earth. This area is bordered by several green plastic silt fences, which are used to contain sediment. To the north of the construction site is a multi-lane highway with several vehicles visible. To the east, there is a paved parking lot with some construction equipment and materials. The surrounding landscape includes green trees and grassy areas. The text 'CURRENT AERIAL IMAGE' is overlaid in large, white, bold, sans-serif capital letters on the left side of the image.

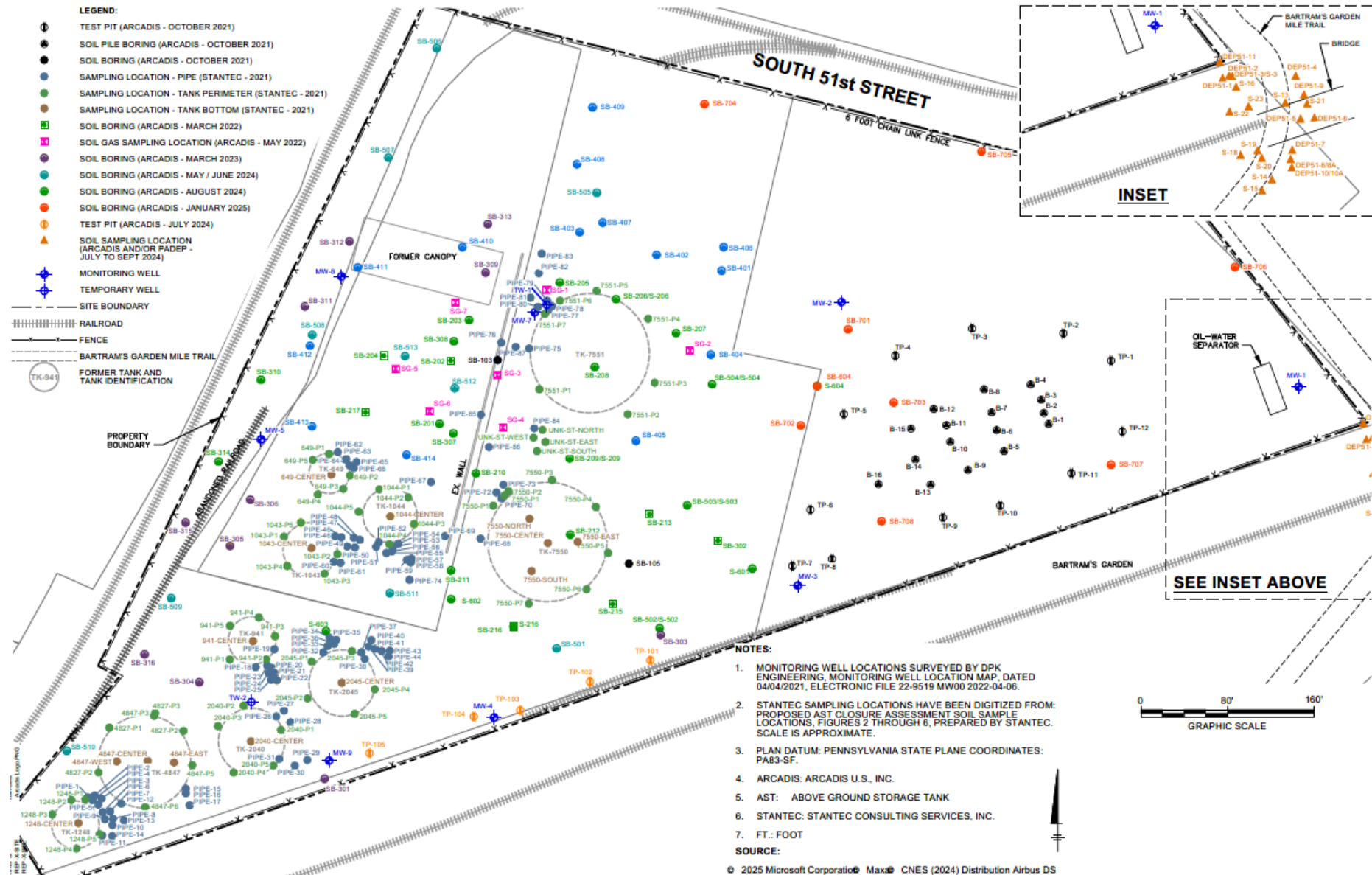
Site History (cont.)

- In December 2021, Alliance purchased the Site.
- In early 2022, Alliance began design and approvals for a warehouse use. Additionally, Alliance entered the site into the Act 2 Program.
- By the end of 2023, Alliance obtained the necessary permits and approvals to begin development of a 165,000 SF warehouse building.
- In April 2024, Philadelphia Water Dept (PWD) responded to a report of yellow-colored water leaving the Site.
- In June 2024, Alliance installed erosion and sediment controls and demolished existing buildings and removed existing on-site concrete.
- In July 2024, a revised NIR was submitted to include chromium compounds.
- The Site is currently under jurisdiction of PADEP as part of both the Aboveground Storage Tank (AST) Closure Program and Act 2 Program and a NPDES Stormwater Permit issued by PADEP on 9/5/2023; with a minor amendment approved on 9/17/2024.
 - The submission of the permit and the minor amendment require public notices to be posted in the PA Bulletin. Comments submitted in response to comments on the first permit were addressed in the minor amendment.

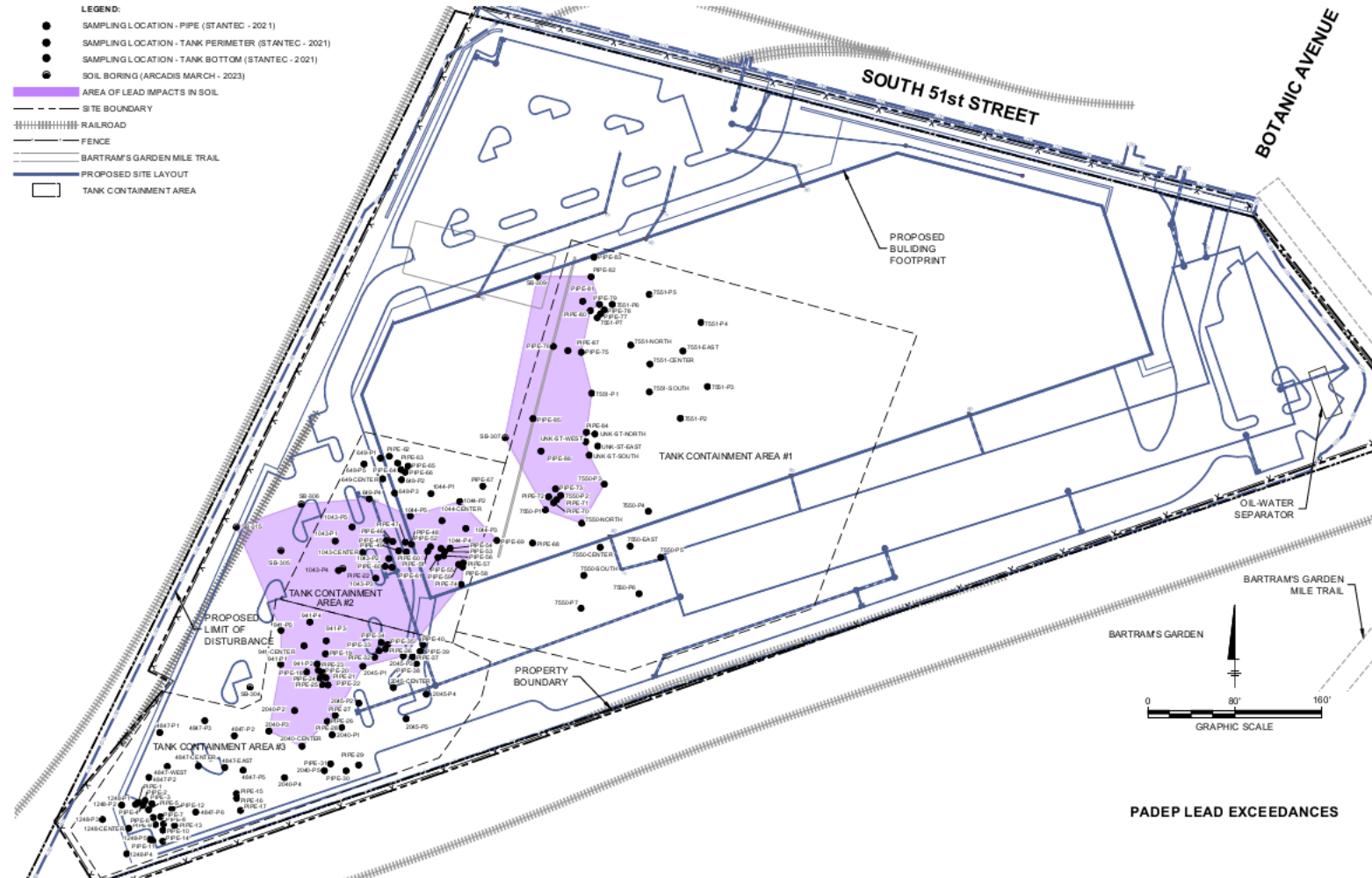
Contaminants Identified at the Site

- Petroleum-related organic compounds and lead associated primarily with the former use of the property as a fuel oil terminal from approximately 1951- 2021 are present at the Site.
 - Petroleum-related Constituents of Concern (COCs) in soil that exceed PADEP criteria due to historical operations include lead, benzene, naphthalene, bis(2-choloethyl)ether, and biphenyl. The extent of the COCs in soil has been delineated during the AST closure and Act 2 investigation activities.
 - COCs exceeding criteria in groundwater include benzene and lead. The concentrations have been delineated through groundwater sampling and using PADEP modeling tools.
- Total chromium and hexavalent chromium were found to be additional, fill-related COCs: present at the Site in soil and groundwater due to the historic placement of fill onsite in the early 1900s. Concentrations in soil and groundwater are greater than the PADEP criteria.
 - Fill has been observed at and beyond the southern property line as well, indicating that fill was also historically placed outside the Site boundaries.
 - Discussed on later slide.

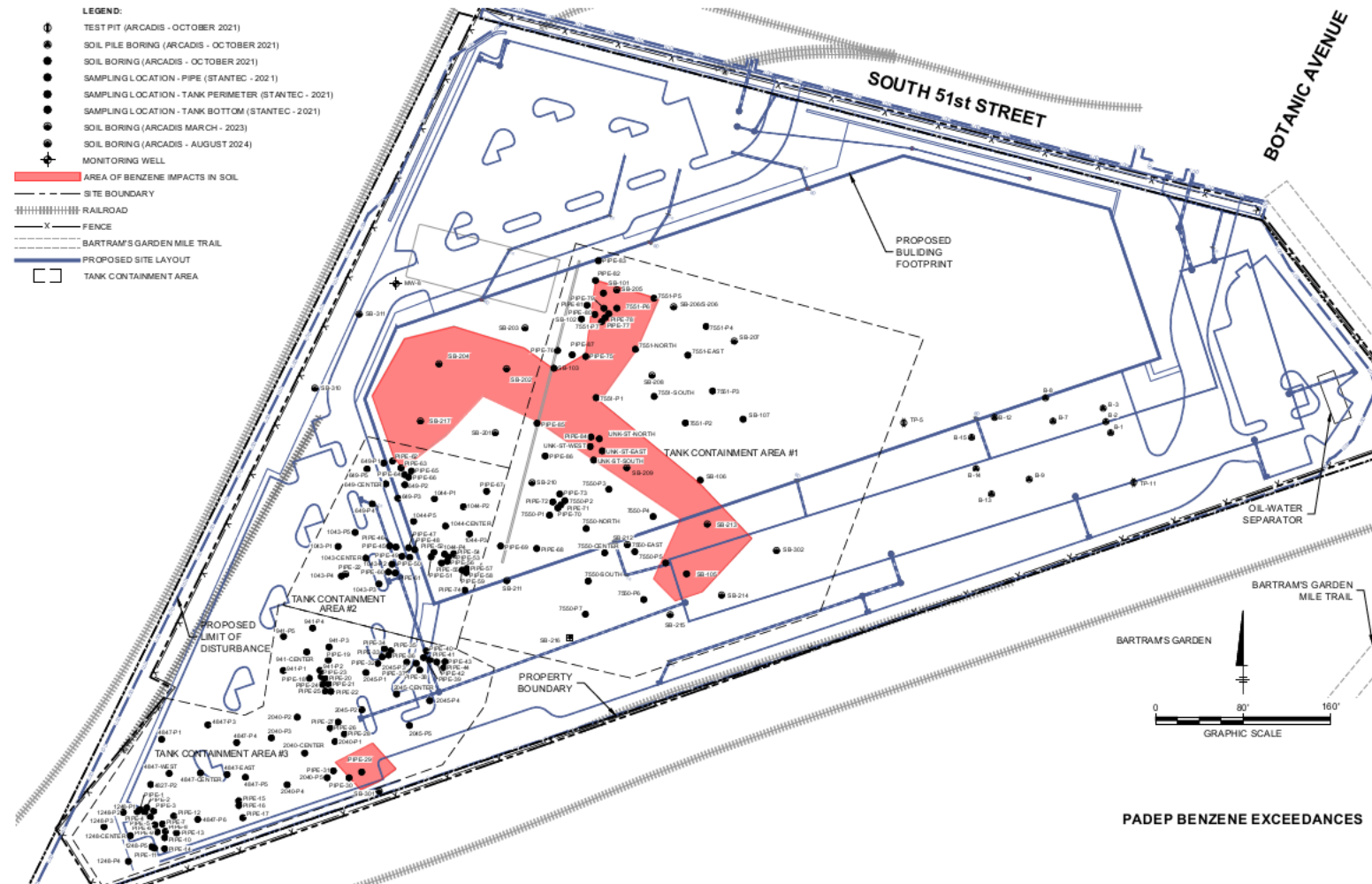
INVESTIGATION LOCATIONS



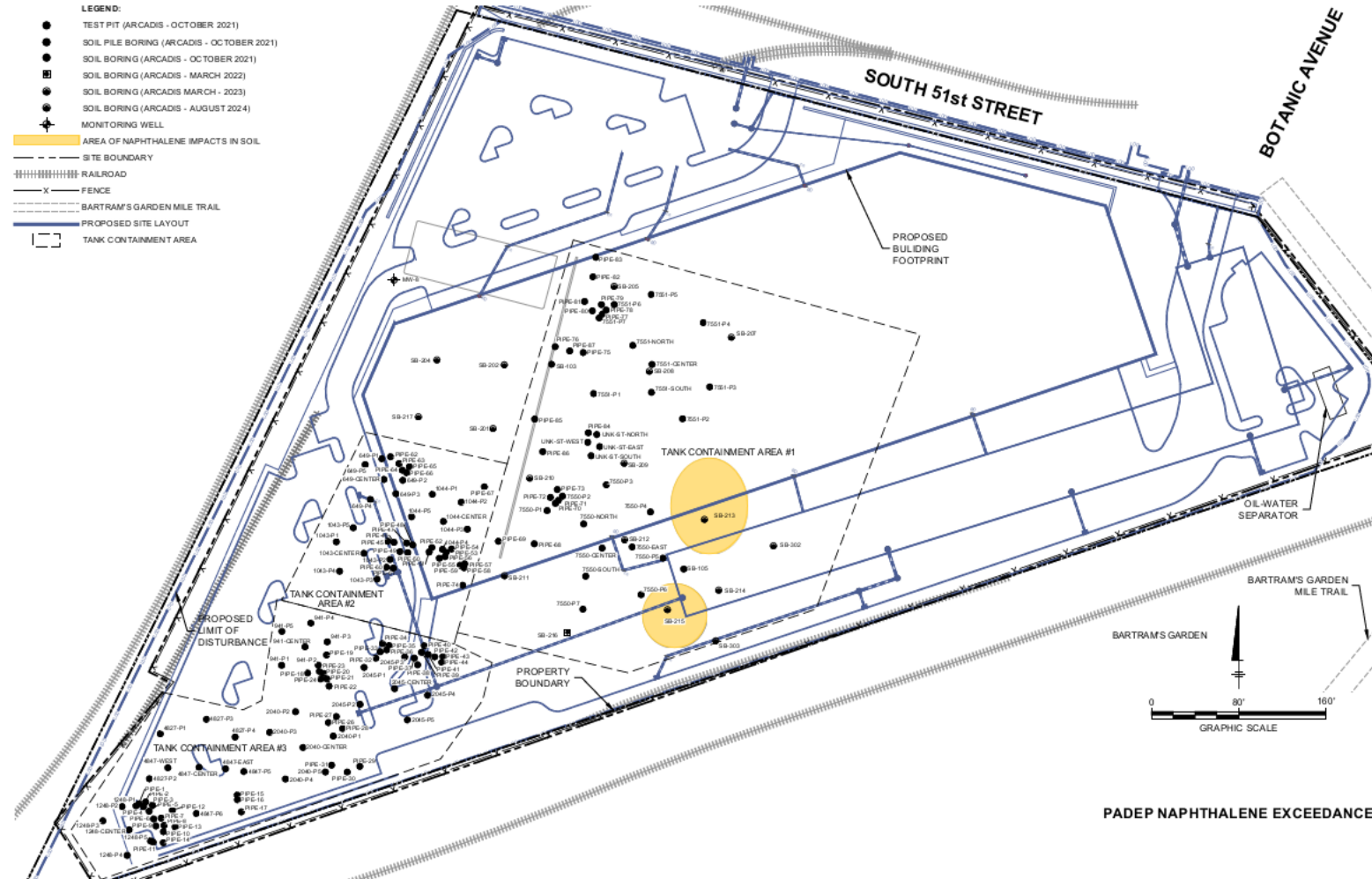
Lead in Soil



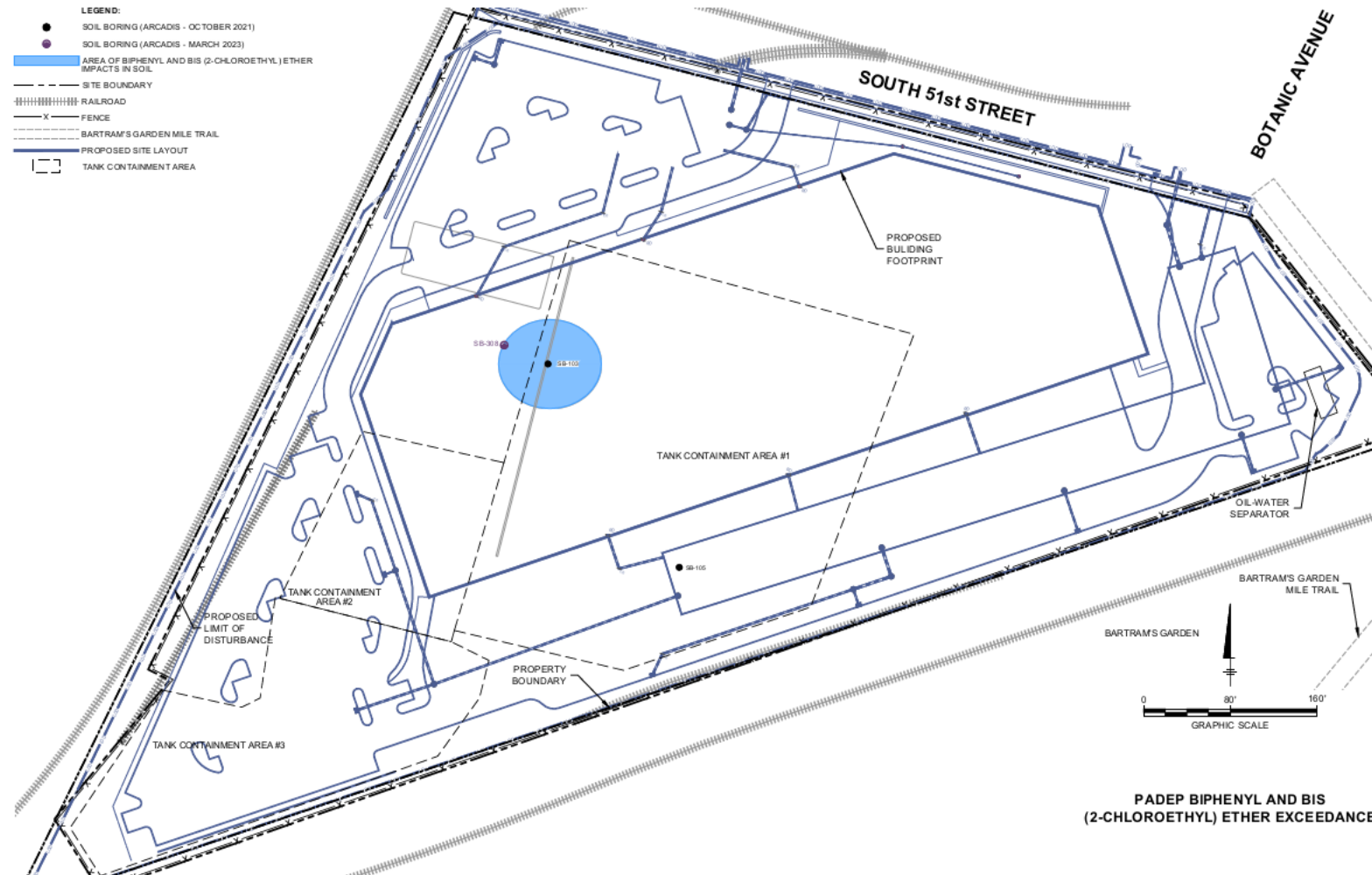
Benzene in Soil



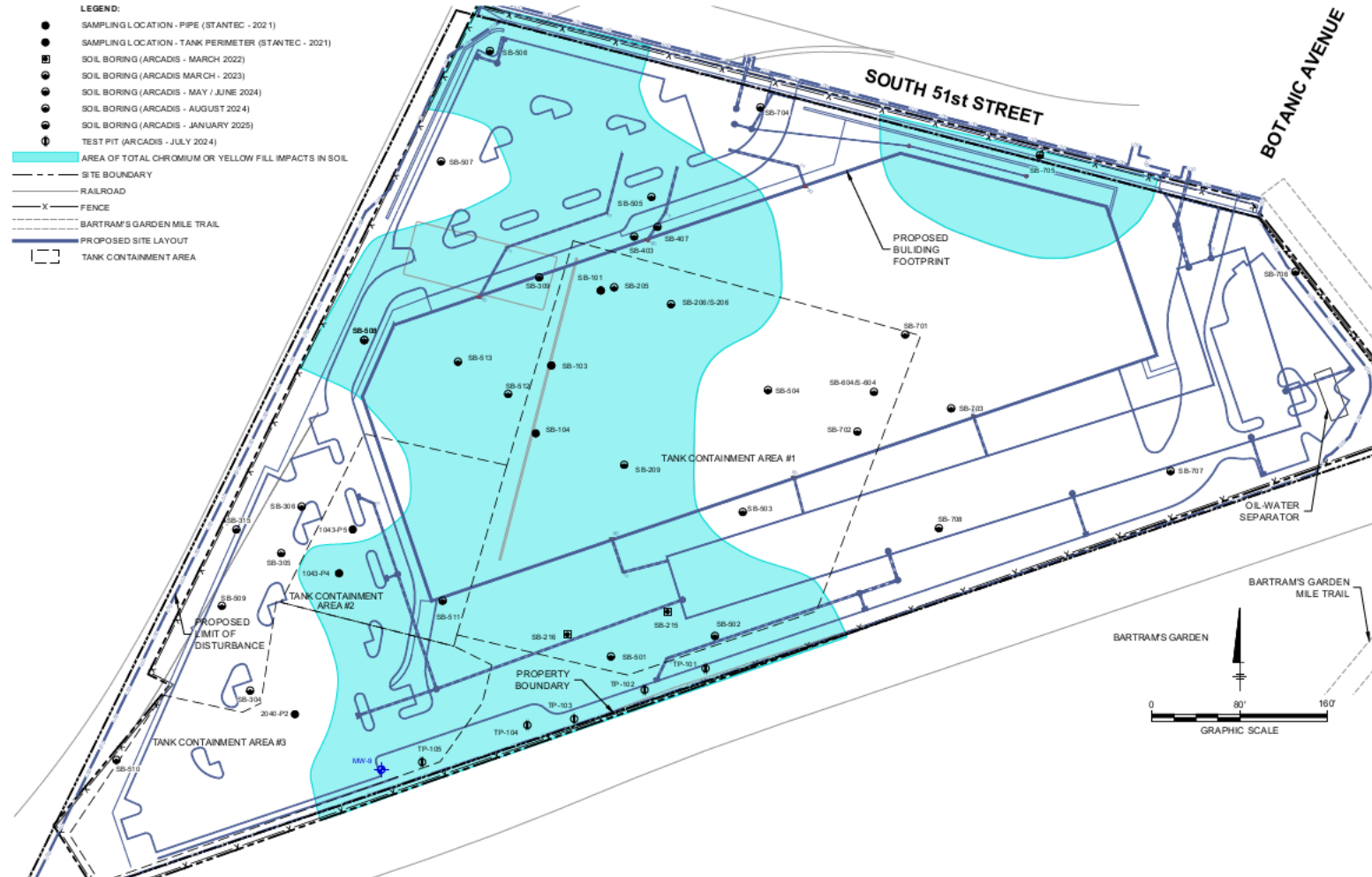
Naphthalene in Soil



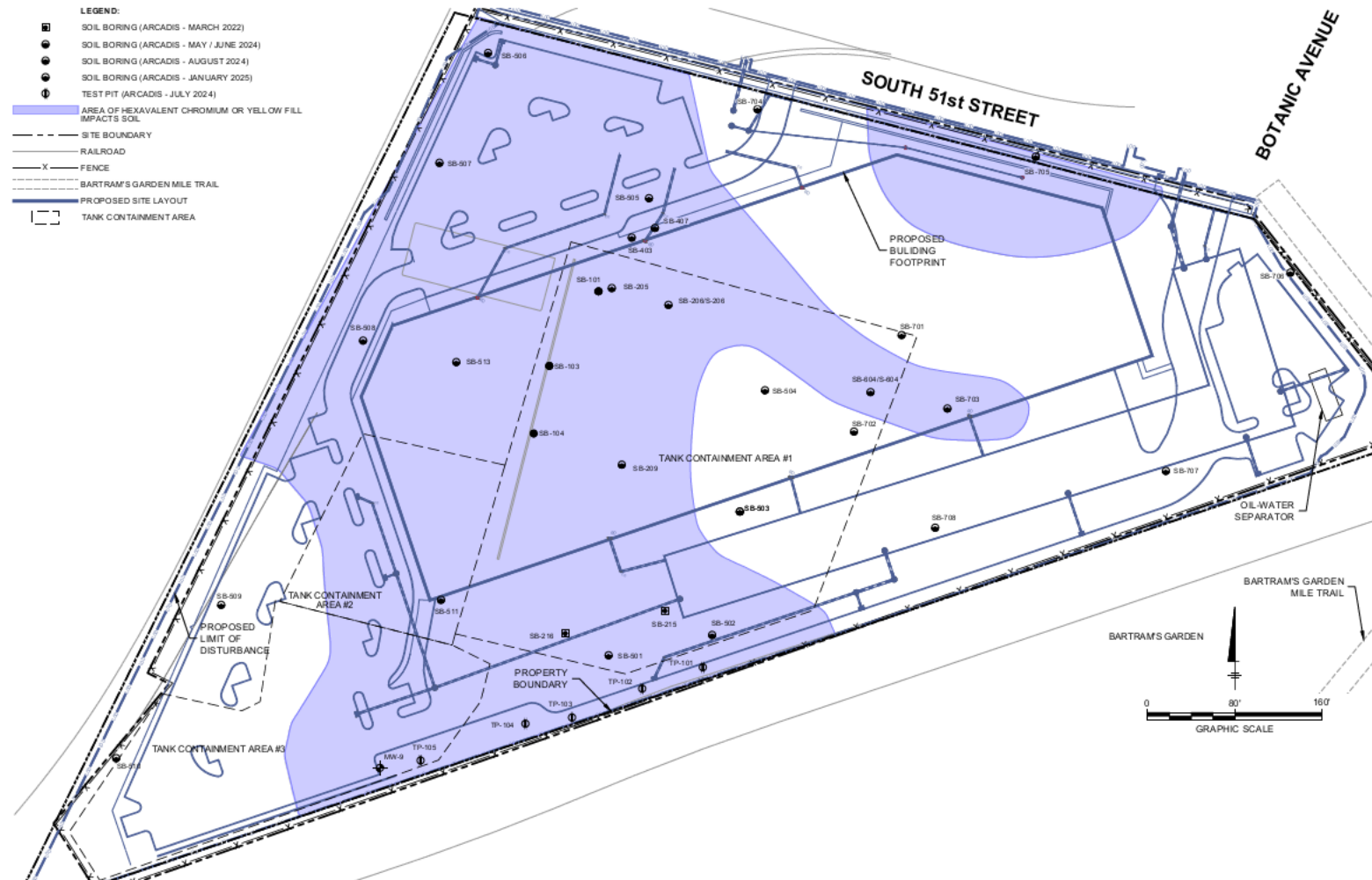
Biphenyl & Bis(2-chloroethyl) Ether in Soil



Total Chromium in Soil (Visual / Analytical)



Hexavalent Chromium in Soil (Visual / Analytical)



Bartram's Garden Mile Trail (Offsite Soils Area)



- In April 2024, the PWD responded to a report of yellow-colored water leaving the Site, near the Bartram's Garden Mile Trail.
- Multiple investigations took place by PADEP and Alliance to address the concern.
- It was determined that the total chromium and hexavalent chromium sediments were present on the trail resulting from stormwater runoff contacting historic fill onsite and off-site that contained chromium compounds.
- Chromium was also present in soils/sediments adjacent to the trail.
- Subsequent offsite soil testing identified the presence of chromium in soils along the immediate area of the trail unrelated to the Site (discussed later).

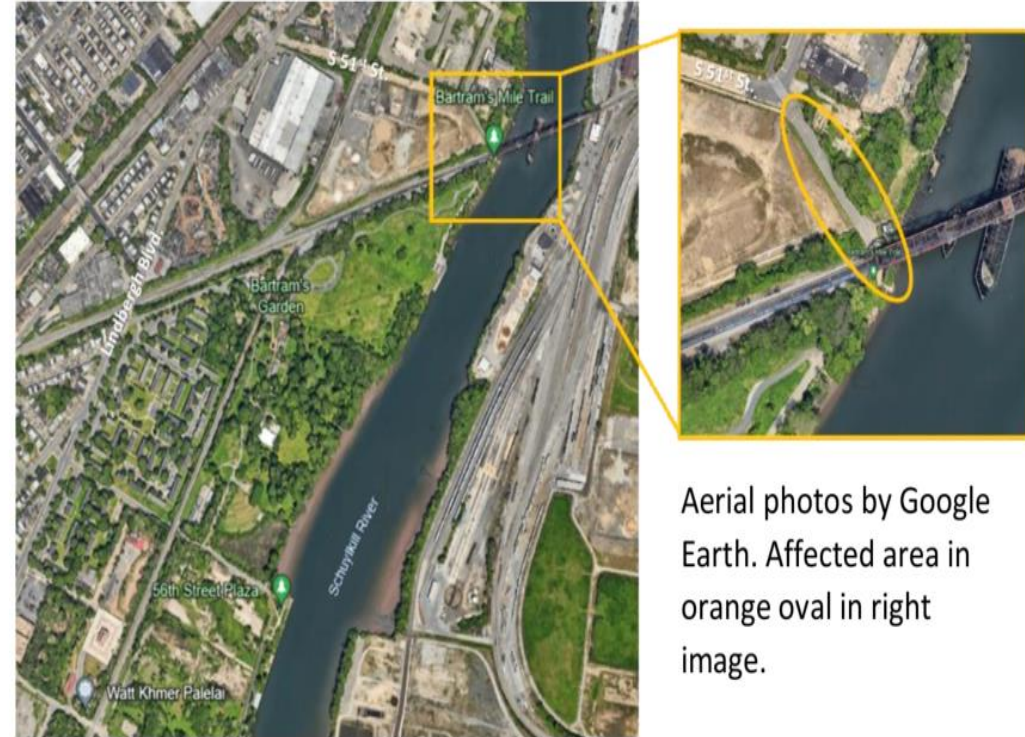
Publicly-Available Information

On July 19, 2025, the Philadelphia Department of Health published a fact sheet about what occurred and provided information related to the health effects of chromium.

PADEP Website with Additional Site Information:

[Alliance 51st St / Bartram's Garden Mile Trail | Department of Environmental Protection | Commonwealth of Pennsylvania](#)

Screenshots from Fact Sheet:



Aerial photos by Google Earth. Affected area in orange oval in right image.

RESOURCES FOR MORE INFORMATION

[ATSDR Chromium ToxFAQs](#)

[NIEHS Hexavalent Chromium Health and Education](#)

[EPA Chromium Compounds Hazard Summary](#)

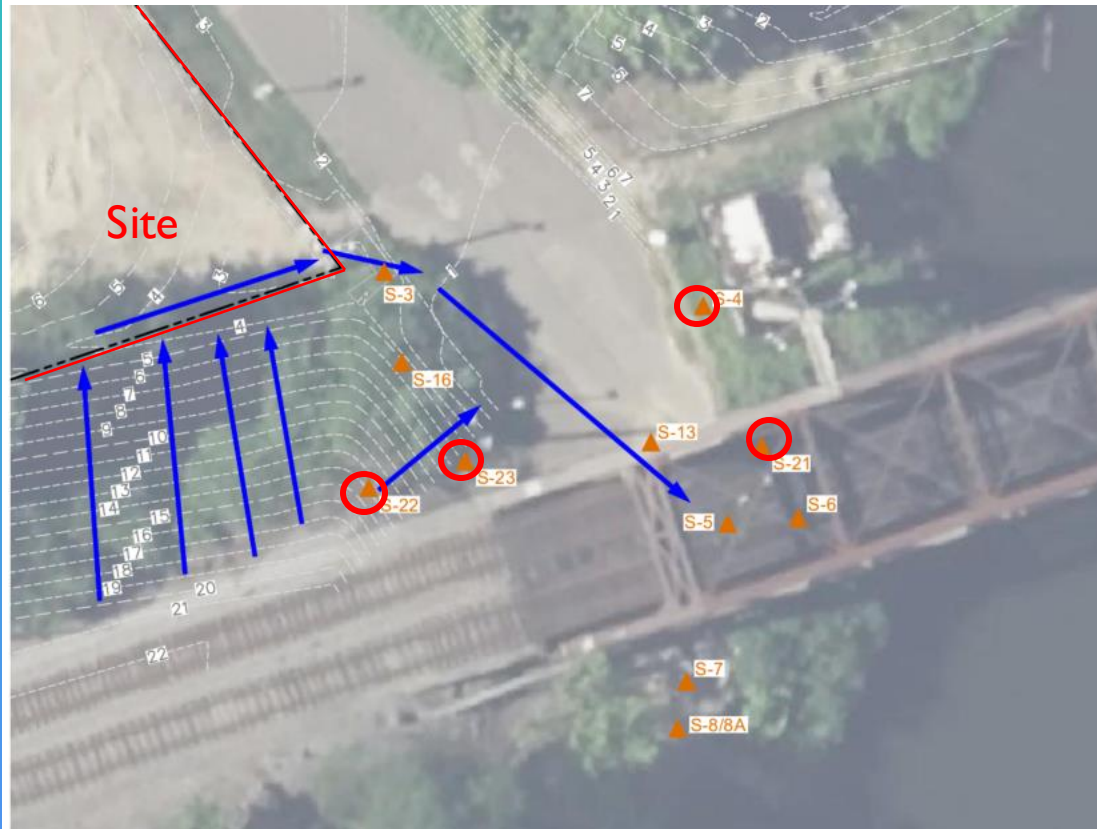
[PA Fish Consumption Advisories – 2024 PA Fish and Boat Commission Fishing Summary Booklet Excerpt](#)



[Updates from Bartram's Garden about the affected area](#)


If you have any health-related questions, contact DOH at 717-787-3350, dehe@pa.gov or fill out an [environmental health complaint form](#). If you have any environmental questions, please contact DEP's Southeast Regional Office at

484-250-5900.







Bartram's Garden Mile Trail – Chromium Soil/Sediment Investigation



 PATH OF SURFACE WATER RUNOFF
 SOIL SAMPLING LOCATION (ARCADIS AND/OR PADEP - JULY TO SEPT 2024)

 Sample is higher in elevation compared to Alliance Site
 (could not be impacted by site runoff)



LEGEND:
 IMPACTED FROM KNOWN AND UNKNOWN SOURCES
 HEX CR DETECTED IN DRAINAGE SWALE LIKELY FROM SURFACE WATER RUNOFF FROM RAILROAD EMBANKMENT
 NO HEX CHROMIUM DETECTED IN SAMPLES
 NOT IMPACTED FROM ALLIANCE SITE
 AREA OF LIKELY SURFACE WATER FLOW OFF SITE
 SURFACE WATER RUNOFF PATH

NOTES:
 1. SAMPLES S-3, S-5, D-6, S-8/8A, S-7, AND S-13 WERE ALL AT LOCATIONS WHERE SEDIMENT WAS REMOVED.
 2. SAMPLES S-5, S-6, AND S-8/8A WERE SAMPLED ON GROUND BEHIND "WALL" AT THE SAME ELEVATION AS THE ASPHALT ON RIGHT SIDE OF WALL.
 3. S-21 SAMPLED ON SOIL PILE THAT IS BEHIND THE "WALL." SOIL THERE IS RAISED ABOVE THE WALL SO SAMPLE IS HIGHER IN ELEVATION THAN S-5 AND S-6.
 4. S-22 AND S-23 WERE TAKEN ON SLOPE COMING DOWN FROM RAIL TRACKS.



Bartram's Garden Mile Trail - Findings

- As determined by Alliance and PADEP sampling and analysis, total chromium and hexavalent chromium are present offsite in soils at locations not related to or impacted by the Site, but from outside sources including:
 - historic placement of fill in the area (outside the Site area);
 - the deposition of Schuylkill River sediments; and,
 - tidal influence of the river.
- Alliance has taken measures to eliminate any chromium from leaving the Site, including the creation of berms that contain stormwater runoff.
- Alliance has removed impacted soils and sediment from the trail by shoveling and scraping regardless of the source.
- PADEP has agreed that the current presence of hexavalent chromium along the trail is not entirely related to the Alliance site.

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Bartram's Garden Mile Trail (Offsite Soils Area) -HHRA

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- An HHRA determines if there is risk associated with people contacting COCs in soil or groundwater.
- The HHRA was performed on a group of soil samples that were selected by PADEP and collected with the PADEP, where stormwater runoff occurred.
- Health effects are related to the type of exposure, duration of exposure, and concentration of the chemical compound.
- The HHRA approach was reviewed by PADEP, and their comments were incorporated into the input parameters.
- The HHRA concluded hexavalent chromium in the area of the trail meets PADEP published exposure limits, and do not present a risk to human health or the environment.
- The HHRA was submitted to PADEP on 4/21/2025 and is currently under review.

Contaminant Exposure Elimination

- As with chemicals found in the environment at any contaminated site, in this case, they are associated with the petroleum related COCs and chromium compounds.
- The remedy to eliminate the exposure pathways as at other sites, will be the use of engineering controls installed as part of redevelopment of the Site.
- The engineering controls will include capping the Site with the construction of the building, asphalt and concrete pavement, and other surface cover.
- During redevelopment, the pathways will be controlled by securing the Site, restricting access, conducting perimeter air monitoring, using dust suppression methods as required, and implementing a site-specific soil erosion and sediment control plan.

Remediation Plans

- The remediation plans are to address the COC concentrations in soil and groundwater that exceed criteria using a deed notice restricting use of the property and prohibiting groundwater use on the site.
- The engineering controls will include capping the Site with the construction of the building, asphalt and concrete paving, and other surface cover.
- A stormwater collection system will be built to collect stormwater from paved and building areas.
 - The stormwater will be held by the stormwater system and discharged through a PWD stormwater connection.
 - Stormwater pipes will be sealed to prevent any groundwater intrusion.
 - None of the collected stormwater will infiltrate the Site.
 - Stormwater collection plans have been approved by PADEP.



Protective Measures

- COCs identified on the Site will be controlled through various measures during and after redevelopment
- During redevelopment
 - Soil erosion and sediment controls will be implemented following the approved NPDES/PWD plan and permit.
 - Installation of filter socks and silt fences.
 - Installation of rock construction entrance (truck tracking station) to remove soil from vehicles leaving the Site.
 - Securing/covering excavated soil stockpiles, as required.
 - Seeding and maintaining exposed areas of soil during extended periods of inactivity.
 - Surface water control
 - Installing filter socks, soil and rock berms to mitigate surface water and sediment runoff, as required by the NPDES permit design.

Protective Measures (cont.)

- After redevelopment
 - Site will be capped with the construction of the building, asphalt and concrete pavement, and other surface cover.
 - Stormwater runoff will be collected in lined basins and discharged to the storm sewer system.
 - A deed notice will be recorded for the Site restricting land use, prohibiting groundwater use, and requiring maintenance of environmental controls.
 - The obligation to maintain the environmental controls will 'run with the land' and be the obligation of any future owner of the Site.

Public Comments on RIR/CP – Reminders

- Alliance implemented Site controls which have been effective and will be maintained until redevelopment occurs.
- Alliance has not caused or contributed to any of the contamination found at the Site.
- Alliance voluntarily entered the PA Act 2 Program to remediate the Site and has complied with every agency request.
- The chromium contamination has been present for close to if not longer than 100 years.
- Alliance has controlled the chromium contamination.
- Redevelopment is ready to commence once market conditions allow and a tenant/user is found.

Public Comments on RIR/CP – Group Email Comments

Comment 1: Alliance is proposing to redistribute soil at the site in order to make it level and then cap the site with as a part of the construction of a proposed warehouse. However, Alliance's cleanup plan states that, "Redevelopment plans are currently paused until a prospective buyer is identified." Alliance's proposed cap on the site is unacceptable because there are currently no plans to redevelop, or cap, the site until a potential buyer for the site is found.

Response to Comment 1:

- ***Alliance has an approved site plan and is ready to commence development of the property.***
- ***The Site is secured by fencing and there are no current receptors to onsite soils.***
- ***While redevelopment is paused due to market conditions, the Site is being monitored as approved by the PADEP through existing National Pollution Discharge Elimination System (NPDES) and Philadelphia Water Authority (PWA) stormwater permits.***
- ***Erosion and sediment controls including berms are in place to mitigate stormwater runoff, and inspections are conducted on at least a weekly frequency in accordance with the PADEP-approved permits to confirm no run-off is present. Following rain events that exceed 0.25 inches, additional inspections are conducted.***

Public Comments on RIR/CP – Group Email Comments

Comment 2: The “proposed remedy” section of Alliance’s cleanup plan mentions that soil will be taken from the Southwestern portion of the site and moved to a central area of the parcel, but Alliance neglects to mention that it also plans to take soil from the Eastern portion of the site and place it in the middle of the site. The Eastern portion of the site contains soil that is contaminated with hexavalent chromium beyond DEP’s statewide health standards. In Alliance’s graphic showing areas where soil will be excavated (figure 14), Alliance also fails to include that soil boring SB-703 showed hexavalent chromium contamination beyond statewide health standards. Figure 14 should be updated to show chromium contamination at SB-703. When digging into the Eastern portion of the site, where hexavalent chromium contamination is known to exist, and where the site is closest to the Bartram Mile trail, Alliance could easily disturb hexavalent chromium contamination in soil and groundwater, potentially causing this contamination to leave the site, as it did last summer.

Response to Comment 2:

- ***The only soil that will be cut from the eastern portion of the Site and redistributed, is the above-grade soil pile that is present adjacent to the SB-703 location. The soil pile does not contain chromium compounds.***
- ***During redevelopment, the SB-703 location will be covered with approximately eight feet of soil.***
- ***Any contaminated soil that is moved within the Site during development will be placed beneath the building or will be paved over and will not be exposed.***
- ***Controls are currently in place as discussed in response to Comment 1 and site media is not being disturbed or going offsite.***

Public Comments on RIR/CP – Group Email Comments

Comment 3: Alliance has not placed any groundwater monitoring wells in the location on the Eastern side of the site where it proposes to cut into existing soil. Alliance should identify groundwater levels in the Eastern area of the site where Alliance is proposing to remove soil. This lack of information about groundwater levels increases the risk that contaminants will be disturbed when moving soil at the site. Alliance should also add at least two groundwater monitoring wells in the section on the Eastern portion of this site where it is currently proposing to excavate and relocate soil.

Response to Comment 3:

- ***Monitoring wells MW-1, MW-2, MW-3 and MW-4 are located along the eastern property boundary.***
- ***Only the above grade soil pile will be redistributed across the Site.***
- ***Soil below grade on the eastern portion of the Site will not be disturbed.***
- ***The entire Site will be raised in elevation to increase the distance between ground surface and groundwater.***

Public Comments on RIR/CP – Group Email Comments

Comment 4: Unfortunately, Alliance maps groundwater levels in terms of height above sea level, rather than feet below ground surface (BGS). The distance between ground surface and groundwater at the site must be mapped in Alliance's proposed cleanup plan. Alliance should also map potential groundwater elevations that will exist after Alliance's proposed soil reorganization, specifically in the area on the Eastern portion of the site where Alliance is proposing to remove soil. If the site is capped where groundwater levels are known to be high, this could cause contaminated groundwater to surface during significant rain events.

Response to Comment 4:

- ***On the eastern portion of the Site, only the above grade soil pile will be cut and redistributed.***
- ***With the exception of the southwestern portion of the Site, the entire Site overall will be raised and the distance from the ground surface to the water table will increase.***
- ***The depth to water will increase in the central, northern and eastern portions of the Site upon filling and grading.***

Public Comments on RIR/CP – Bartram’s Garden Comments

Bartram’s Garden retained Urban Engineers to review the fate and transport model that was presented in the RIR/CP. Three comments were included:

1. As per the [attached] assessment, we have questions about the flow of contaminated groundwater to adjacent public areas given that the Arcadis report only interprets the eastward movement. How will DEP ensure that the north-south lateral spread be assessed and how can the public trail and Bartram’s Garden be protected in future from the spread of contaminated groundwater? Related, what is the process for monitoring future groundwater movement and for how long will the monitoring continue?

1. Response:

- *The fate and transport modeling figures are general schematics to simplify the interpretation of the model results.*
- *Groundwater beneath the Site and Bartram’s Garden discharges to the river ; it has been doing so over history, including when historic fill was placed in the area along the river.*
- *People walking on the trail do not come in contact with groundwater as it is several feet below the ground surface. Groundwater is not used for potable purposes in the area and all residents and businesses are connected to public water supply.*
- *Future groundwater movement will not require monitoring upon PADEP’s acceptance of the modeling that is presented in the report, as well as PADEP approval of the Act 2 Final Report for the Site.*

Public Comments on RIR/CP – Bartram's Garden Comments (cont.)

2. The Arcadis report says that the Chromium 6 may be coming from the railroad line. However, the pattern of the Chromium 6 findings on the Alliance site suggests that it is emanating from the center of the site. How will DEP establish the source of the contamination? If the railroad line is the source, what will DEP do to investigate and ensure that the railroad company is notified and required to clean up the contamination?

2. Response:

- *The western half of the Site is where Alliance did the majority of its environmental sampling; the sampling indicates that this contamination is not the source of the offsite contamination.*
- *Historical filling of the entire area along the trail/river is believed to be the source of Chromium 6 at and around the Site.*
- *A number of the offsite sample points with hexavalent chromium detections are at elevations that are much higher than the Site and could not be impacted by the Site.*

Public Comments on RIR/CP – Bartram's Garden Comments (cont.)

3. We have heard that Alliance may be selling the property. If a new owner is involved, then what is the role DEP will play to ensure that the site remediation is done correctly. Who will be responsible for the ensuring the groundwater monitoring?

3. Response:

- *Alliance is the current owner and the current developer of the Site. There are no current plans to sell the property. The current plan is to seek a tenant/user.*
- *The Site was voluntarily entered into the PADEP Act 2 cleanup process by Alliance as the developer of the Site.*
- *When the Act 2 case is closed, a deed notice will have been recorded in the county recording office and any ongoing obligations would run with the land and be an obligation of any future owner and remote future owner of the Site.*



Project Schedule

- **February 14, 2025** – Arcadis submitted the Act 2 Remedial Investigation Report and Cleanup Plan (RIR/CP) to PADEP - 90-day review period
- **February 19, 2025** – Arcadis submitted to PADEP a memorandum proposing the Bartram's Garden Mile Trail risk assessment calculation approach to address hexavalent chromium on the trail.
- **February and April 2025** - Additional groundwater sampling conducted to address chromium and hexavalent chromium (4 stable quarters).
- **March 21, 2025** – Arcadis submitted revised Public Involvement Plan and amended RIR/CP to PADEP.
- **April 21, 2025** – Arcadis submitted HHRA to PADEP that addresses hexavalent chromium in offsite soils area on trail – 90-day review period
- **July 2025** – Arcadis will submit a RIR/CP Addendum that summarizes the February and April groundwater results.
- **TBD 2026** – Construction commences, subject to market conditions. Alliance is seeking users for the proposed building.
- **2026 – 2027** – Submit Final Report after redevelopment is complete. Upon PADEP approval of Final Report, deed restrictions will be recorded for the Site.

Document Repository

Website:

<https://Alliance51stStreet.com>

Hard copies of documents are located at
Bartram's Garden Welcome Center

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QUESTIONS & DISCUSSION

