



December 8, 2021

Mr. Jack Kelly  
On-Scene Coordinator  
U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103

**Subject: Final Letter Trip Report  
Lefevre Street Container Removal Site  
EPA Contract No. 68-HE-0320-D0003  
Technical Direction No. T601-21-02-004  
Document Tracking No. 0302**

Dear Mr. Kelly:

Under the Superfund Technical Assessment and Response Team (START) Contract, Tetra Tech, Inc. (Tetra Tech) is submitting the Final Letter Trip Report for the Lefevre Street Container Removal Site, located in Philadelphia, Philadelphia County, Pennsylvania. This letter summarizes U.S. Environmental Protection Agency (EPA)-lead activities between 2018 and August 4, 2021.

Please contact me at PHONE or via e-mail at EMAIL if you have any questions or comments regarding this submittal.

Sincerely,

START TD Project Manager

Enclosure (1)

cc: TD file  
Tetra Tech START Program Manager  
Tetra Tech Removal PWS Leader

## **1.0 INTRODUCTION**

Under the Superfund Technical Assessment and Response Team (START) Contract No. 68-HE-0320-D0003, Technical Direction (TD) No. T601-21-02-004, U.S. Environmental Protection Agency (EPA) Region 3 tasked START to assist with investigative activities at the Lefevre Street Container Removal Site (the Site), located in Philadelphia, Philadelphia County, Pennsylvania.

This letter report provides Site location and historical information in Section 2.0 and presents a summary of EPA-lead Site investigative activities in Section 3.0. References cited in the report are listed in Section 4.0. Figures are provided in Appendix A.

## **2.0 BACKGROUND**

### **2.1 SITE LOCATION**

The Site is currently a vacant lot located at 2710 Lefevre Street in the Bridesburg neighborhood of Philadelphia, Philadelphia County, Pennsylvania. The parcel identification (ID) number is 080N190241, according to the City of Philadelphia (the City) Atlas database. The Site is located at an elevation of 20 feet above mean sea level and is located on the Philadelphia topographic quadrangle. The geographic coordinates at the approximate center of the Site are 39.9995° North latitude and -75.0722° West longitude.

The vacant lot is approximately 10,450 square feet, measuring 55 feet wide by 190 feet long. Prior to the EPA removal activities, the vast majority of the Site was covered by a concrete slab of varying thickness that served as the floor of a former warehouse structure. The Site is bounded to the north by residential yards on Edgemont Street; to the east by Lefevre Street with residences beyond; to the south by residential yards on Salmon Street; and to the west by two back yards associated with homes along Salmon and Edgemont Streets.

### **2.2 SITE HISTORY**

A two-and-a-half-story brick warehouse was previously located on the Site, dating to the 1920s or earlier. According to available records, the facility was known as the Eagle Wagon Works in 1920. The warehouse was used as a sanitation supply company from approximately 1930 until 1945. The facility reportedly covered the entire property until a fire destroyed approximately one-third of the western end (rear) of the warehouse in 1938. This burned area was not redeveloped and remained vacant after 1938. According to historical documents, the warehouse was subsequently used by a concrete company from 1945 to 1951; a roofing material, rolled tin, and insulation company from 1951 to 1953; and a lumber company from 1953 to 1955. From 1955 to October 2008, it housed electrical supplies, equipment, and components. The EPA On-Scene Coordinator (OSC) was informed that electrical transformers were stored at the property. It is unknown what practices were used to handle and maintain the equipment. In October 2008, the City demolished the warehouse pursuant to a mandated court order (EPA 2020).

## **3.0 EPA SITE ACTIVITY SUMMARY**

In 2009, after the City demolished the warehouse, the City contacted EPA to address drums and totes of oil containing polychlorinated biphenyls (PCB) stored in the back of the newly created lot. From April to June 2009, EPA conducted sampling of the liquids and removed the PCB-containing drums and totes as well as non-PCB contaminated heating oil from an underground storage tank.

EPA returned to investigate the property in 2018 based on information received suggesting that spills may have occurred on the property when transformers and other equipment were present. The following is a synopsis of those investigative activities and the removal action that followed:

- Surface and subsurface soil samples were collected as part of a removal evaluation in 2018 and PCB concentrations in surface soil consistently exceeded 50 parts per million (ppm);
- EPA attempted to have the property owner conduct a cleanup but the owner could not commit to the work. EPA prepared an Action Memorandum in June 2020 which called for the cleanup of the Site to below 1 parts per million (ppm) PCBs without restrictions or to between 1 and 10 ppm with placement of a cover meeting Toxic Substances Control Act (TSCA) criteria to the extent practicable;
- In October 2020, to provide a more substantial characterization of Site conditions, EPA arranged for a geophysical investigation and performed additional sampling for PCBs including the collection of surface soil, concrete, and subsurface soil samples. The Site owner's contractor also conducted sampling for PCBs;
- The EPA-collected sample results were provided to the Site owner to enable the owner's contractor to develop a more accurate estimation of cleanup costs;
- Negotiations with the Site owner to conduct the cleanup under an Administrative Order on Consent (AOC) were unsuccessful; therefore, EPA and its contractor mobilized to the Site in early March 2021 and commenced removal of surface soil on March 2, 2021;
- All surface soil from the Site was disposed at a TSCA landfill in Belleville, Michigan (US Ecology). A small amount of transite asbestos was uncovered during this work and also was disposed of at the US Ecology TSCA landfill facility;
- Following surface soil removal activities, EPA initiated the excavation of concrete and subsurface soil exceeding 1 ppm PCBs with the original intent to excavate the Site until only soils containing PCBs below 1 ppm remained (the back ~1/4 portion of the Site was not excavated as all concrete and subsurface soil assessment results in that area were below 1 ppm);
- Excavated material was sent to the US Ecology TSCA landfill in Michigan if exceeding 50 ppm total PCBs and to the Sandy Run municipal solid waste/residual waste landfill in Hopewell, Pennsylvania if below 50 ppm total PCBs;
- Following the initial excavation, post excavation sampling was performed in early April 2021 using a total of thirty-seven ~15' by ~15' sampling grids. Nine-point composites were collected to an ~2" depth along with a central grab sample in the middle of the grid at a ~6" depth. The soil results revealed: 24 grid areas had total PCB levels between 1 and 10 ppm; 7 grid areas had total PCB levels between 10 and 50 ppm; and 5 grid areas had total PCB levels above 50 ppm. See Figure 1;
- The early April 2021 grid sampling results led to further excavations in late April 2021 to attain the TSCA requirements for high-occupancy use (i.e.,  $\leq 1$  ppm total PCBs without further conditions or  $>1$  ppm and  $\leq 10$  ppm with an asphalt or concrete cap or a soil cover meeting TSCA geotechnical criteria). The depth of the additional excavations was approximately 12 to 18 inches within most grids. Several rusty underground pipes were excavated and included for disposal. Only one small pipe section near Lefevre Street was found to contain a liquid/sludge-like material;
- In order to prevent work delays, post excavation sampling was performed immediately after individual grids were excavated each day;
- Following additional excavations, approximately 15 of the 37 grids were found to have total PCB levels between 1 and 10 ppm (in some cases, 9-point composite samples were collected from areas somewhat larger than the original 15' by 15' grids). Based on the results, EPA elected to place a soil cover over the entire Site, instead of continuing with excavations to reach  $\leq 1$  ppm in all areas (Figure 2);

- An area of the Site adjacent to yards behind the Edgemont Street homes was excavated several times and PCB levels continued to exceed 50 ppm total PCBs. The OSC determined that further excavation may cause stability issues for the neighboring yards. The area (1) encompasses all of grid PE-13 and small parts of grids PE-33 and PE-11 and (2) measures roughly 22' long by 17' wide by 5' to 7' deep. Orange caution fencing was placed at the depth of the pit to identify the area during any future excavation activities that may occur on the property;
- The first delivery of clay to meet the TSCA geotechnical criteria occurred on May 20, 2021 (Special Bulletin B explains that the geotechnical criteria for plasticity could not be met). Clay was placed to a depth of at least 10" throughout the excavated area per TSCA requirements. If the soil in some grids did not exceed 1 ppm PCBs, the soils were also covered with clay in order to provide a uniform layer of materials across the excavation. In order to bring the Site to its approximate grade before excavation commenced, select fill was then added to the Site followed by top soil. Grading and compacting was performed with a bobcat bucket. Clay, select fill and top soil was provided by Dunrite Sand & Gravel of Vineland, New Jersey;
- On June 23, 2021, the last load of top soil arrived and was spread at the Site. Hydroseeding was completed at the Site on June 24, 2021;
- EPA's contractor periodically watered the property using a water truck from June 24, 2021 through July 23, 2021;
- Fence installation along Lefevre Street was completed on August 4, 2021 ending onsite activities.

#### **4.0 REFERENCES**

U.S. Environmental Protection Agency (EPA). 2020. "Lefevre Street Action Memorandum – Approval and Funding for a Time-Critical Removal Action at the Lefevre Street Container Site." EPA Region 3 Superfund & Emergency Management Division. June 11.

## **APPENDIX A**

### **FIGURES**

- 1 Lefevre Street Container Removal Site – Post Initial Excavation
- 2 Lefevre Street Container Removal Site – Removal Action Completion





ID	Sample Type	Result (ppm)
PE-SW-01	Grab	0.14
PE-SW-02	Grab	0.07
PE-SW-03	Grab	1.52
PE-SW-04	Grab	11.5
PE-SW-05	Grab	0.1
PE-15-HA	Grab	1.3
PE-16-HA	Grab	0.2
PE-17-HA	Grab	0.1
PE-18-HA	Grab	4.9
PE-19-HA	Grab	0.28
PE-20-HA	Grab	0.08
PE-21-HA	Grab	0.2
PE-22-HA	Grab	0.15
PE-23-HA	Grab	0.01
PE-24-HA	Grab	0.16
PE-25-HA	Grab	0.29
PE-26-HA	Grab	1.6
PE-27-HA	Grab	0.16
PE-28-HA	Grab	15.6
PE-29-HA	Grab	29
PE-30-HA	Grab	5.4
PE-31-HA	Grab	0.11
PE-32-HA	Grab	0.15
PE-33-HA	Grab	19
PE-34-HA	Grab	21.5
PE-35-HA	Grab	8.4
PE-36-HA	Grab	0.36
PE-37-HA	Grab	0.059

**Legend**

**Single Grab Results**

- 0.0 - 1.0 ppm
- 1.1 - 10.0 ppm
- 10.1 - 40.0 ppm
- 40.1 - 215.0 ppm

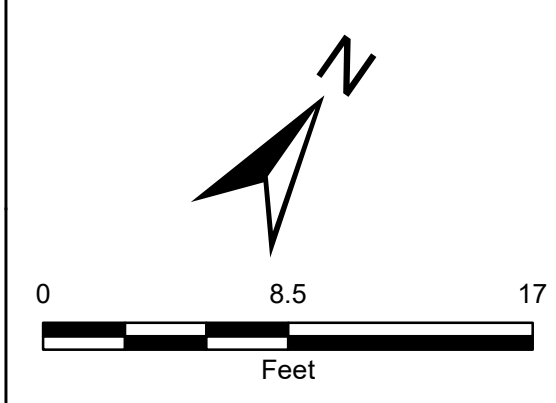
**Composite Grid Results**

- 0.0 - 1.0 ppm
- 1.1 - 10.0 ppm
- 10.1 - 40.0 ppm
- 40.1 - 170.0 ppm

□ Lefevre Street PCB Onsite Boundary

**Note:**

- Composite concentration is indicated in each grid and includes 9-point composites collected ~2" depth within a ~15 by 15' grid.
- Grab sample concentrations are indicated in the table to the right and a grab sample was collected within each grid at ~6" depth.



Lefevre Street Container Removal  
Philadelphia, Philadelphia County, PA

**Figure 1**  
**Lefevre Street Container Removal Site –**  
**Post Initial Excavation**  
Samples collected week of April 5, 2021



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**Legend**

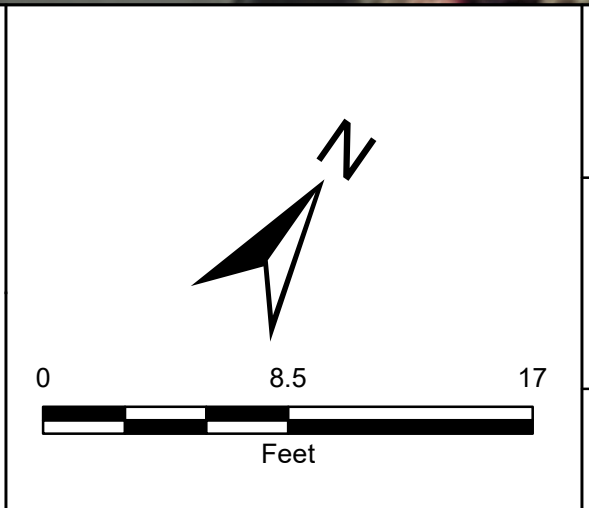
- Single Grab Results
- ▭ Lefevre Street PCB Onsite Boundary

**Composite Grid Results**

- 0.0 - 1.0 ppm
- 1.1 - 10.0 ppm
- 10.1 - 40.0 ppm
- 40.1 - 170.0 ppm

**Note:**

- Removal completion sample results indicate all Site soils range from ND to 10 ppm PCBs (except grids PE 11 and 13).
- PCB sample results appearing in the figure are now below at least 10" of clay, several inches to more than a foot of select fill and a layer of top soil and vegetation.
- Samples were collected at different times in May and June 2021.



Lefevre Street Container Removal  
Philadelphia, Philadelphia County, PA

**Figure 2**  
**Lefevre Street Container Removal Site –  
Removal Action Completion**  
Samples collected multiple dates April to June 2021

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