

# **ARM Brickhouse**

# Engineers and Scientists

An ARM Group Company



April 17, 2023

Mr. Paul Bucco Davis Bucco and Makara 10 E Sixth Avenue, Suite 100 Conshohocken, PA 19428

RE: Project Status Report 501 Washington Street Conshohocken, PA 19428

ARM Brickhouse Project P00234453.01

Dear Mr. Bucco,

This letter provides an overview of the environmental issues identified during the performance of a Phase I Environmental Site Assessment at the above referenced property. As discussed, since the assessment identified environmental areas of concern that would warrant follow up Site Phase II Intrusive Testing in order to confirm the absence or presence of contaminants, we have not prepared the final written Phase I Environmental Site Assessment Report. We recommend finalizing that report after conducting the Phase II Activities, as this work may resolve some of the issues raised by the current assessment. Cost estimates for the Phase II ESA recommended will follow under separate cover.

The following summarizes the areas of concern identified. Diagrams illustrating relevant features are attached for reference.

Hale Fire Pump Company Historic Operations

The Hale Fire Pump Company tested and prepared Fire Pumps for sale at the subject property from at least 1952 until the Mid-1990s. Historic Environmental Reports and PADEP Files revealed the following information about their operations.

Petroleum Underground Storage Tanks (UST).

1. 6,000 gallon heating oil UST

The building was previously heated with fuel oil fired boiler. The fuel oil was stored in a 6,000-gallon steel UST located on the east side of the building. It was reported that the UST was closed in place by filling with concrete in 1979. It was reported that the Cardinal Group drilled two soil borings 3 feet from the north and south ends of the tank in 1995. The samples were analyzed for Total Petroleum Hydrocarbons (TPH). The results did not exceed PADEP Action

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Levels in force at the time. While the available data indicates this UST was closed properly without obvious evidence of releases, future development activities may necessitate the removal of this UST. A Geophysics Investigation to locate the perimeter of the UST along with additional soil bores to allow the collection of samples for currently regulated heating oil compounds would likely be required by a buyer of the property.

# 2. 1,000 gallon gasoline UST

Hale utilized a 1,000 gallon gasoline UST for unknown purposes. The UST was located outside the western side of the original building. The UST was reportedly closed in place before a building addition was constructed over the UST in 1985. The Cardinal Group drilled four soil borings, one on each side of the tank. Total Petroleum Hydrocarbons were detected between 44 and 330 parts per million. Cardinal concluded that soil remediation was not necessary as the petroleum would likely degrade over time. Similar to the 6,000-gallon heating oil UST, this UST may need to be removed during future land development activities, and a buyer would likely require the collection of additional samples for analysis of currently regulated gasoline UST parameters.

# 3. 5,000 gallon gasoline UST

Hale utilized a 5,000-gallon gasoline UST to add fuel to fire pumps for testing prior to sale. The UST was located at the southwestern edge of the building. This UST was removed by the Cardinal Group in 1995. Soil contamination beneath the gasoline dispenser was observed. Three hundred tons of soil was excavated and shipped off site for disposal.

Gasoline was observed in the excavation pit on the groundwater surface. PADEP was notified of the release. Three groundwater wells were installed. These wells were sampled for gasoline parameters four times per year from 1995 through 2004. Data shows contaminant levels decreasing over time. The last monitoring report in the PADEP file from 2004 recommends "Pursue Demonstration of Attainment for PADEP statewide human health non-residential standard in a nonuse aquifer". There is no record that this recommendation was pursued.

A buyer would likely require a groundwater investigation in this area to determine current conditions. The wells were not observed during our inspection. However, we were not aware of their existence at the time and they may still be present and available for sampling. If not, new monitoring wells would be necessary to determine current conditions. If residual impacts above Act 2 statewide standards remain in the groundwater, pursuit of a relief of cleanup would likely be necessary.

#### Former Paint Room

Hale painted the fire pumps in a paint room reportedly located along the eastern side of the building. They were listed as a large quantity generator of hazardous waste, which we suspect



was related to the use of paint thinners, paint equipment cleaning solvents, and waste paint. Industrial painting operation during their time of operation are associated with releases of hazardous materials to the environment. A limited soil sampling campaign conducted by Cardinal in 1995 at the area of some stained soil near the loading dock did not identify contamination by volatile organic compounds. However, a buyer would likely require a more comprehensive sampling campaign for volatile organic compounds in soil and groundwater targeted toward this area of the property.

# Surface Water Drainage Ditch with Oily Residue

Surface water runoff drains from the northwestern parking lot and a portion of adjoining property to the west into a storm pipe that runs beneath the western building addition. Where the pipe daylights at the southwest area of the property an oil residue was observed on the water surface. The source of the oil residue is unknown, but it may be released to the former UST that was closed in place under the building addition. A buyer would likely require an investigation into the source of the residue along with appropriate remedial actions depending on the results of that investigation.

#### Canal and Locks

The Schuylkill River Canal Company operated a canal along the north side of the Schuylkill River from sometime before 1928 until sometime between 1950 and 1963. A lock for the canal was located on the southern edge of the subject property. The canal and lock system has been abandoned. ARM Brickhouse has worked on other nearby projects and discovered that the canal system was abandoned by filling with residual waste materials, including asbestos containing waste. The potential that the system was similarly abandoned on the subject property may result in significant cost for future development activities. A buyer would likely want to evaluate the quality of the materials used to abandon the Canal and Lock system.

### 601 Washington Avenue

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The adjoining property to the east, 601 Washington Avenue, was once operated as the Philadelphia Steel and Iron Works, as well as the Frassoni Iron Works, manufacturers of pressure and storage tanks for water, oil, and gas. This property has been remediated through the Land Recycling and Environmental Remediation Standards Act (Act 2). As part of that process, they drilled and tested 12 groundwater monitoring wells. The groundwater was found to contain both petroleum related compounds, as well as chlorinated volatile organic compounds.

Site investigation reports and other correspondence filed with the state alleged that some of the chlorinated solvent contamination was believed to be migrating onto their property from an upgradient property. ARM Brickhouse's review of groundwater flow and contaminant distribution maps indicate the most likely source to be properties to the north of Washington Avenue. However, a buyer of the subject property could require that groundwater investigations

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be conducted to confirm that the contamination discovered at 601 Washington Avenue was not derived from the 501 Washington Avenue property. The drilling and testing of one or more monitoring wells along the eastern edge of the subject property would be necessary to complete that effort.



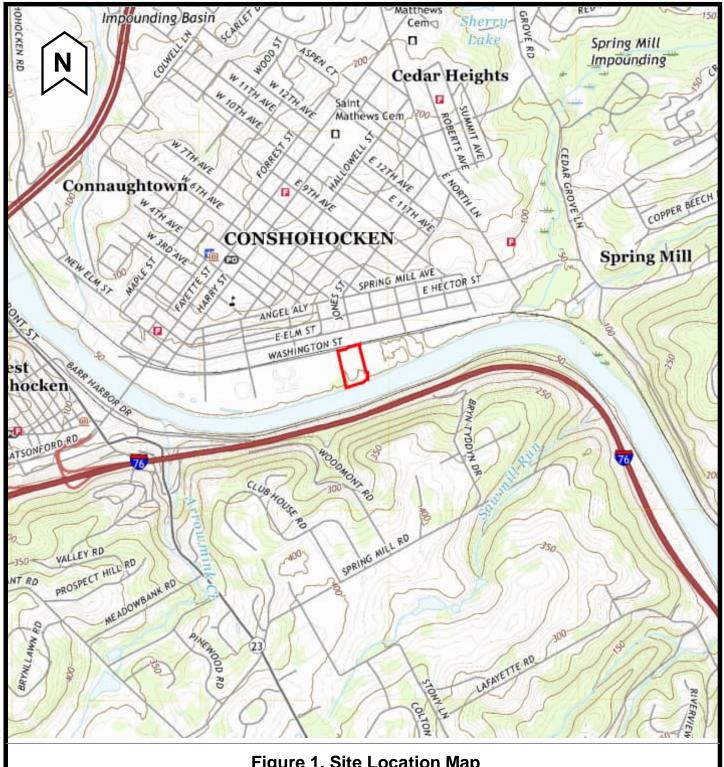
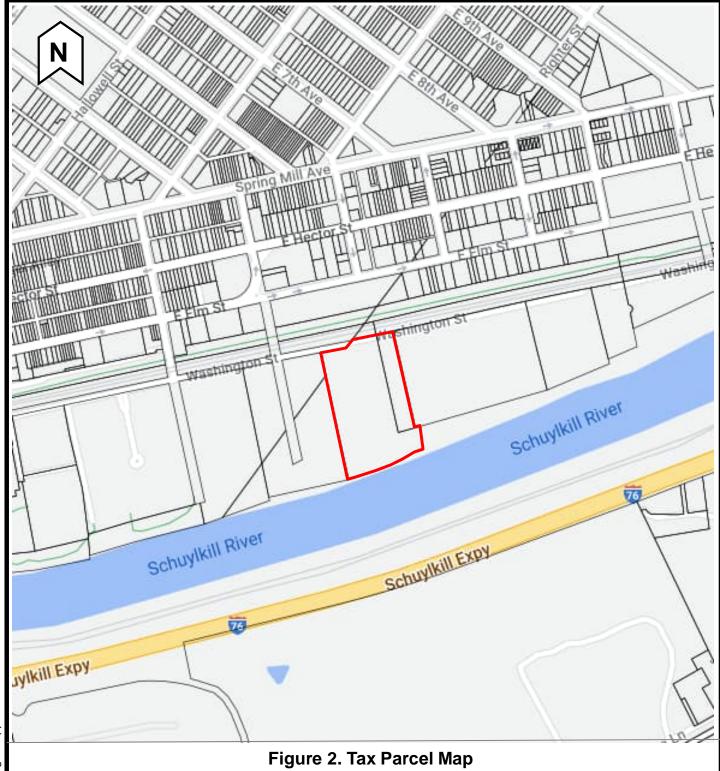


Figure 1. Site Location Map
Source: Norristown (PA) 2019 USGS Topographic Quadrangle Map

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Appendix A – Property Maps and Site Plans BE Project No. 23-4453-0





Source: Montgomery County Tax Parcel Map (EDR 2023)

= Approximate Site Boundary

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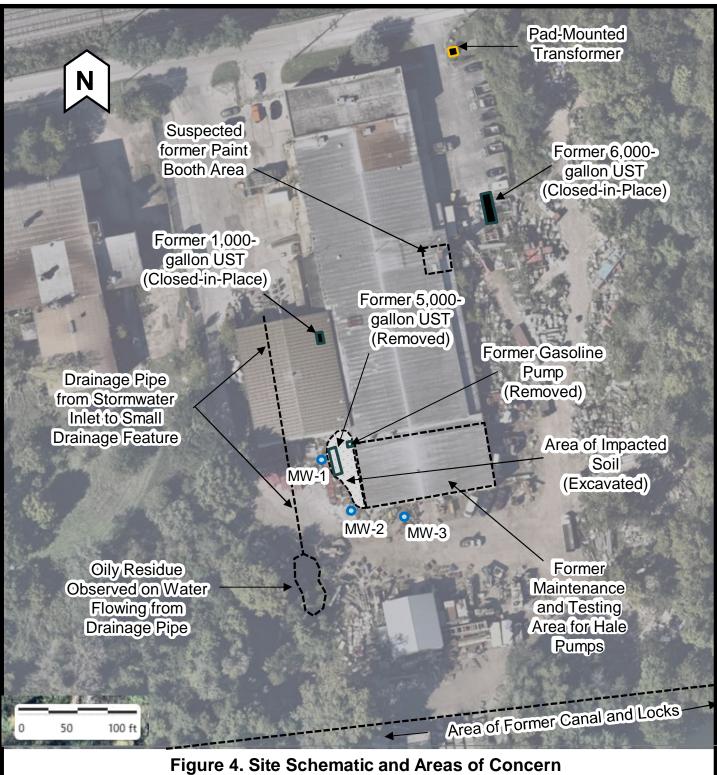


Figure 3. Aerial Photograph Source: EDR 2023

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Source: EDR 2023

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Figure 5. Groundwater Gradient at Subject Property and Adjoining Property Source: Roux Associates, Inc. *Act 2 Combined Report* August 28, 2020

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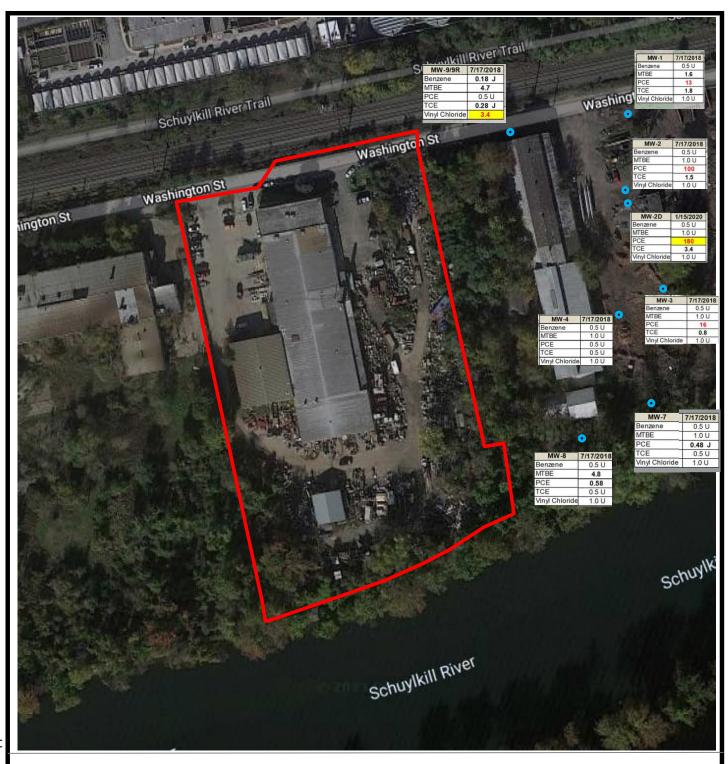


Figure 6. VOC Concentrations on 601 Washington Source: Roux Associates, Inc. *Act 2 Combined Report* August 28, 2020

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