

**United States Environmental Protection Agency
Region III
POLLUTION REPORT**

Date: Friday, June 29, 2007

From: Eugene Dennis

To: Ana Pomales, ATSDR

Subject: American Street Tannery Site

American & Bodine Streets, Philadelphia, PA

Latitude: 39.9653880

Longitude: -75.1412770

POLREP No.: 4

Site #: 031B

Reporting Period: March 23, 2007 thru June 29, 2007.

D.O. #:

Start Date:

Response Authority: CERCLA

Mob Date:

Response Type:

Demob Date:

NPL Status: Non NPL

Completion

Removal

Date:

Incident Category: Assessment

CERCLIS ID #:

Contract #

RCRIS ID #:

Site Description

The American Street Tannery Site is located in the Northern Liberties Section of Philadelphia, Philadelphia County, Pennsylvania. The site is within the city block comprised of George, Bodine, American and Widley Streets. The area being investigated includes the site of the former tannery and the residential properties and surrounding homes on Widley Street. The former tannery comprised of a complex of five building that housed different tanneries until 1986. The site was abandoned until 1987 when it was subject to a removal action to stabilize facility of a variety of chemicals including acids, base/neutral, corrosives, toxic, and others. Later in 1990, a fire damaged the buildings. The City of Philadelphia decided to demolish the buildings, but not before vandals broke in and spilled PCB at the site and in the neighborhood. A second removal action took place to cleanup the spilled PCBs. The site was later acquired by Tower Development and redeveloped under PA Act 2 Program. The site is currently owned by Liberty Homes Philadelphia Inc. Residents in proximity of the site have expressed concerns about handling of contaminated soils and chemicals left behind in groundwater.

Current Activities

During the months of March, April, and May 2007, EPA and START began to receive and review analytical results from samples taken during sampling activities in the months of December 2006 and January 2007. Once all analytical results were received a site sampling map was produced and EPA began transmitting results to ATSDR for review in anticipation of a Health Consult while a trip report was being produced.

On May 17, 2007, START published the EPA Trip Report summarizing EPA's field activities at the American Street Tannery Site. On June 19, 2007, in response to a FOIA request EPA released the report to the petitioner and other stakeholders by posting the report on the EPA Website and notifying interested parties of its availability on the Internet. In the report, EPA states its findings:

- Four five-point composite field samples, eleven discrete field samples, and one field duplicate sample were collected. All surface soil samples were analyzed for SVOCs, pesticides, PCBs, and Target Analyte List (TAL) metals. Lead, arsenic, chromium, and benzo(a)pyrene were detected at concentrations exceeding the PADEP MSCs for direct soil contact in one or more of the samples. Several metals and SVOCs, specifically polycyclic aromatic hydrocarbons (PAH), were detected at concentrations exceeding EPA RBCs for residential soil.
- Four subsurface samples and one field duplicate sample were collected for VOC analysis. No VOC compounds were detected at concentrations exceeding the MSCs.
- Three groundwater samples, one field duplicate sample, one sump water sample, and one trip blank sample were collected for VOC analysis. No VOC compounds were detected at concentrations exceeding above PADEP MSCs for used aquifers with less than 2,500 ppm total dissolved solids content.

- The three soil gas samples were collected. Ethanol, isopropyl alcohol, and acetone were detected in the soil gas samples. Enviroprobe Services, Inc., a START Subcontractor, used a mixture of isopropyl alcohol and acetone to clean the equipment. It is suspected that this procedure may have caused the elevated concentrations of these compounds in the soil gas samples. These compounds were not detected at elevated levels in the subsurface soil or groundwater samples. Tetrachloroethene (PCE) was detected in sample 003-SG03-A at 16.3 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), which exceeds the EPA Region 3 target sub-slab soil gas concentration of 3.1 $\mu\text{g}/\text{m}^3$. While this sample was not a sub-slab soil gas sample, the target shallow soil gas concentration is being used as a conservative bench mark. PCE was not detected in any subsurface soil or groundwater sample.

On June 18, 2007, ATSDR released the Health Consultation document completed for the removal assessment at the site. ATSDR and PADOH concluded the following:

- Exposures to the assessed concentrations of lead, PCBs, arsenic, chromium, PAHs, and other compounds detected in surface soils, pose no apparent public health hazard to area residents that may visit the vacant lot area of the American Street Tannery site.
- Exposures to VOCs in indoor air in residential locations at or near the site represent an indeterminate health hazard because sub-slab vapor (air) sampling or indoor air sampling data are not currently available. However, the levels of VOCs in soil gas, groundwater, sump water, and subsurface soil do not suggest that there would be an indoor air issue at this site.
- Frequent exposures to the levels of contamination detected in the surface soil at the Liberty Lands Community Park, adjacent to the American Street Tannery Site, represent no apparent public health hazard. The levels of inorganic compounds, PCBs, SVOC's, and pesticides are all well below concentrations that would be considered a health threat. The levels of contamination that were detected in the composite soil samples at this property adjacent to the American Street Tannery Site do not indicate that the surface soil was impacted as a result of the alleged mismanagement of the excavated soils during the recent redevelopment at the American Street Tannery Site.

ATSDR and PADOH recommended that EPA collect sub-slab soil vapor samples and determine if there are elevated levels of VOCs accumulating beneath building foundations at the American Street Tannery Site. If VOCs levels are determined by USEPA Region 3 to be high enough to result in an indoor air vapor intrusion issue, then indoor air samples should be collected and analyzed to determine the levels of VOCs that residents may be exposed in their indoor air at the American Street Tannery Site. ATSDR and PADOH also included general recommendations to the public to minimize exposures to lead and general recommendations for blood lead testing for children and pregnant women.

ATSDR and PADOH are soliciting public comment on the Health Consult. The comment period began on June 18th and with end on July 18, 2007. The Health Consult, the EPA Trip Report, community factsheets and other documents were posted on the EPA Website www.epaossc.net/americanstreettannery.

On June 22, 2007, the OSC, ATSDR, PADOH, PADEP and the City of Philadelphia participated in a conference call to share the findings of the Health Consult.

On June 25, 2007, the OSC, CIC, ORC, ATSDR and PADOH met with the Petitioner and NLNA Board members to brief them on EPA's findings and ATSDR/PADOH conclusions and recommendations.

On June 27, 2007, the OSC, CIC and ATSDR met with property owners to discuss their sampling results.

On June 28, 2007, the OSC, CIC, ATSDR Rep, and PADOH Reps attended a NLNA Members meeting at St. Michael's Church. The OSC and PADOH Reps briefed the Northern Liberties community on EPA's findings and ATSDR/PADOH conclusions and recommendations.

Next Steps

EPA and START will prepare a Sampling and Analysis Plan to address sampling soil vapor and indoor air at residential properties immediately adjacent to the vacant lot. The OSC and CIC will schedule with residential property owners when to be sampled. Once samples are collected and analyzed, EPA will request that the results be evaluated to determine if a threat to home owners exist due to vapor intrusion. The evaluation and findings will be shared with homeowners, NLNA, PADEP and City of Philadelphia. The OSC will continue to coordinate with the Petitioner, NLNA, PADEP, and the City of Philadelphia as necessary.