

HRP Title V Environmental Justice Public Meeting - September 1, 2021

Questions & Answers

This list shows all questions received in connection with the virtual public meeting held on September 1 to discuss the Title V air permit modifications and renewal. Hilco Redevelopment Partners (HRP) developed a separate Q&A document specific to the Title V air permits available at <https://www.hrp Philly.com/community>. Those questions and answers have been repeated here (noted with **) in addition to the other questions received.

Questions are copied directly as asked with spelling errors corrected.

Q1: Does Hilco have an emergency operations plan (EOP)?

A: *HRP engaged NorthStar Contracting Group, Inc. (NorthStar) to conduct on-site decommissioning and demolition work. NorthStar follows a document required under OSHA 1910.120 Hazardous Waste Operations (HazWOPER) and Emergency Response Manual that is specific to our site and sets forth emergency procedures.*

Q2: What provisions does this plan have for notification of nearby residents?

A: *Emergency response is currently handled by NorthStar, who operates the facility, and maintains the capability to manage emergency events including appropriate notifications for local residents. Training and knowledge of the Incident Command personnel allow for quick on scene assessment of any potential off-site impacts, and this knowledge and on scene observation would be shared with the Philadelphia Office of Emergency Management (OEM).*

Q3: What provisions does this plan have for evacuation of nearby residents? Or is Hilco relying on the City's EOP?

A: *Emergency response, including evacuation if necessary, is coordinated with the Philadelphia OEM.*

Q4: How has Hilco coordinated with the City's Office of Emergency Management to plan for emergencies and their potential impact on nearby residents?

A: *NorthStar and HRP have conducted meetings with the Philadelphia Fire Dept. and OEM, including tours to maintain their awareness as the site is in the process of demolition. HRP and NorthStar expect to provide key status updates to OEM as appropriate.*

Q5: Has Hilco conducted or worked with relevant authorities on any exercises to test the efficacy of emergency management plans and protocols for the refinery site? If so, were any representatives of nearby communities included in these exercises?

A: *HRP and NorthStar maintain policies and procedures for emergency response for the site's current operations. At this time, the site operations do not include mock exercises. The site had recent actual responses (in connection with the 885 Tank incident), during which Unified Command and Operations were carried out successfully, confirming the efficacy of on-site emergency planning.*

Q6: What is Hilco doing to make these emergency management plans and protocols available to the public?

A: *Plans are shared with the Philadelphia Fire Department and Philadelphia OEM as required or requested of NorthStar or HRP.*

Q7: Will the recording of this video be made available to attendees or the general public?**

A: *The presentation recording, PowerPoint slides, and Q&A summary will be shared via the HRP Philadelphia website, <https://www.hrpphilly.com/community>.*

Q8: Hello do you know what cause the fire on 8\23\2021 if this happen again will they let the community know ahead of time next time because we do not want fossil fuel in my community.

A: *The incident occurred during torch cutting of Tank 885 in preparation for demolition. Tank 885 had been cleaned and inspected and approved for demolition by a third party inspector certified by PADEP in accordance with PADEP requirements. NorthStar's post-incident review identified that some very low amounts of residual material may have been ignited by the hot work demolition activities. The fire was fully contained in the tank, and (other than temporary smoke) no fossil fuels were released. NorthStar has demolished over 60 tanks to date without issue. Going forward, and out of an abundance of caution, NorthStar plans to minimize the risk of this occurring by reducing the amount of hot work, improving firewatch capabilities, and continuing to ensure tanks are cleaned and inspected prior to demolition.*

Q9: to clarify - we will be receiving this PowerPoint at the end correct? **

A: *The PowerPoint will be posted at <https://www.hrpphilly.com/community>.*

Q10: Who is the master planning architect?

A: *The master planning effort is a team of different planning experts and consulting firms lead by CBT (<https://www.cbtarchitects.com/>) and also includes CRB (<https://www.crbgroup.com/>), Veinderweil Engineers (<https://www.vanderweil.com/>), Interface Studio (<http://interface-studio.com/>), BR+A Consulting Engineers (<https://www.brplusa.com/>), and Dynamic Engineering (<https://www.dynamicec.com/>).*

Q11: Wastewater treatment plant regulations differ whether you are or are not refining petroleum products. How will wastewater treatment change at the site as you dismantle fossil fuel production equipment?**

A: *Yes, wastewater treatment will change as the wastes generated on-site change. HRP/PESRM is in discussions with the Pennsylvania Department of Environmental Protection (DEP) to eventually close the on-site wastewater treatment plants (which were in place to support refining) and move to alternate treatment appropriate for the facility's current and future operations. Certain aspects of the current wastewater treatment operations will remain subject to the Title V Operating Permits (TVOP) until shut down.*

Q12: Can you show "before" and "after" photos of the areas that Stephanie Eggert refers to as progress being made?

A: *HRP will make photos available on its website as they become available, <https://www.hrpphilly.com/>*

Q13: How many participants are in the meeting?

A: *There were approximately 100 attendees.*

Q14: How are residents being engaged in the “master” planning of future uses of the site currently? Is HRP open to suggestions for how residents can be effectively engaged in the planning of a development that will greatly impact our neighborhoods?

A: *HRP continues to refine the master plan. HRP shares the master plan updates often with the public and local stakeholders to incorporate feedback in an informal manner.*

Q15: What company or companies work on site to remove hydro carbons and asbestos? Or is Hilco doing the work? Is the asbestos disposal certified? By what organization?

A: *Hydrocarbon and asbestos removal is being conducted by NorthStar in coordination with its subcontractors who are specialized and certified in each area. Hydrocarbon removal is currently handled by: NorthStar, ACV Environmental, MPW Tank & Environmental Services, Inc., Environmental Industrial Services Corporation (EISCO), and Nooter Construction Company. Asbestos abatement is currently handled by: NorthStar, Delta BIDS, Inc., Pepper Environmental, Services, Inc., Spectrum Environmental Services, Inc. with substantial completion estimated by end of this year 2021. Asbestos disposal is certified by US EPA. The Vertex Companies, Inc., operating on HRP’s behalf, provides asbestos abatement oversight and air monitoring for the asbestos removal.*

Q16: Does those air pollution reduction numbers factor in emissions from the Schuylkill River Tank Farm? Specifically, which pollutants are included, and what are the prior and proposed emission limits for each.

A: *No, the numbers provided in the presentation were specific to the former refinery emissions reductions and assumed that Schuylkill River Tank Farm (SRTF) continued to operate. Currently, the SRTF is in a non-operable state. No changes in emission limits will occur with the equipment associated with the SRTF operations. Very little operating equipment remains in the former refinery at this time, and emission limits are unchanged from the existing Title V permit.*

Q17: THEY HAS BEEN BAD SMELL COME FROM THE REFINERY. WELL, I THINK THE COMMUNITY NEED KNOW THE TANKS ARE BE TAKE DOWN ONE BY ONE WE DON'T NEED FOSSIL FUEL

A: *Please report any questions or concerns to Jasmine Sessoms, HRP’s Senior Vice-President (SVP) of Corporate Affairs, at (215) 907-8345.*

Q18: Which labor unions are currently represented at the site?

A: *The current labor unions represented on site include Laborers Local 57, Laborers Local 332, Laborers Local 135, Operating Engineers Local 542, Boilermakers Local 13, and Teamsters Local 107.*

Q19: AMS slide states that they will issue the notification for the title 5 permit in Philadelphia inquirer and the "local paper". what local paper do you plan to issue the notice in? **

A: *A public notice of AMS’s intent to issue the Title V Operating Permit (TVOP) will be published in the Pennsylvania Bulletin and the Philadelphia Inquirer, Philadelphia Tribune, or Philadelphia Daily News, as required under Pennsylvania regulations.*

Q20: PLEASE consider using the newspaper Philadelphia Tribune to notify the community! **

A: *A public notice of AMS's intent to issue the Title V Operating Permits (TVOP) will be published in the Pennsylvania Bulletin and the Philadelphia Inquirer, Philadelphia Tribune, or Philadelphia Daily News, as required under Pennsylvania regulations.*

Q21: WILL THE OIL TANKS GO TO THEY HEAT PEOPLE HOME AND GASOLINE THEY IS USE FOR CARS SO ALL TRAIN WILL STOP GO INTO THE REFINERY.IS THERE IN ONE WORK IN THE REFINERY RIGHT NOW. WE NEED TO KEEP MY COMMUNITY SAFE SO MANY PEOPLE HAS DIED FROM CANCERS SO MANY PEOPLE HAS SUFFER WITH ASTHMAS FROM CHILDREN TO ADULT

A: *The facility will never again house refinery operations. The facility is undergoing demolition and will be redeveloped. The SRTF (i.e., fuel farm) is currently non-operational.*

Q22: When the PES Fire Brigade responded to the tank fire, was PFAS (fire suppressant) used? Where? How much? How has it been/will it be disposed of? When?

A: *A mixture of water and firefighting foam was used to extinguish the fire. This foam appears to have contained per- and polyfluoroalkyl substances (PFAS). Small areas of soil that came in contact with the water and foam mixture was removed and characterized for proper off-site disposal. The water/foam mixture was stored in tanks onsite and is currently undergoing testing. The analytical results will determine the treatment and disposal plan.*

Q23: When will the public be allowed to provide input on the updated Masterplan?

A: *HRP continues to refine the master plan. HRP shares the master plan updates often with the public and local stakeholders to incorporate feedback in an informal manner.*

Q24: Please explain how you evaluate the internal condition/contents of tanks before demolition. Why didn't your system work effectively this time?

A: *Prior to any tank demolition, a third party inspector certified by PADEP completes an inspection in accordance with PADEP requirements and approves each tank for demolition. NorthStar has demolished over 60 tanks at the site to date. Standard procedure requires a thorough tank inspection prior to demolition. The common practice for tank demolition is to torch cut the thicker steel at the lower portion of the tank then finish the demolition with machines. Since the anomalous incident on the 23rd of August, NorthStar has updated its tank demolition procedure to minimize torch cutting and improve firewatch capabilities as it looks to continuously improve its means and methods. The onsite emergency response team immediately responded to the incident and successfully contained and extinguished the fire.*

Q25: with changes in air permitting, what changes to air monitoring will occur? **

A: *Yes, the facility was subject to air monitoring that had been required for active refining operations that will no longer apply as the permitting is updated. The facility will maintain any monitoring as required by facility air permits for the current and future operations.*

Q26: You will repurpose the waste water treatment plants for storm water run-off or will they ultimately be decommissioned/demolished?

A: The existing industrial waste water treatment plants were designed and constructed to treat effluent as a result of refinery operations. With those operations no longer occurring, HRP intends to decommission and demolish the plants pending stormwater sampling and feasibility for repurposing.

Q27: If stormwater is tainted with contaminants, will you alter the WW treatment, and not just move it to the sewers? It may still need to be treated for industrial contamination.

A: At the present time, stormwater is processed in the two on-site industrial wastewater treatment plants. In the near-term as part of future planning, HRP will be sampling stormwater as part of the overall development plan. Stormwater runoff that does not meet the requirements set by PADEP and/or the EPA will be treated or contained prior to entering public sewers or the Schuylkill River. HRP anticipates treatment either at a centralized location onsite prior to outfalls and/or on each individual development parcel within the park based on the sampling and feasibility of each treatment measure.

Q28: HOW LONG WILL THIS WORK TAKE REMOVE ALL THE TANK

A: Expecting tank removal to be complete within 18 months (or, by approximately March 2023).

Q29: Will the Title 5 permit for the SRTF reflect the pollution from the tank decom/demolition?*

A: HRP is evaluating options for the future use of the SRTF. As noted above, it is in a non-operable state at this time. The current SRTF TVOP does not specifically address decommissioning or demolition of those tanks. All tanks are or will be emptied of product prior to demolition, which means only very minimal emissions would be expected during that work. There is currently no timeline to decommission and demolish the SRTF.

Q30: Can HRP & NorthStar to provide a guide for possible smells? For example: If you're smelling A, it's likely B. If you're smelling C, it's likely D. That would be helpful to have so residents don't have to feel emotional stress and call in a complaint to AMS every time there's a smell. To have some guidelines as to what is expected VS what might be a real issue to take action on would be very helpful.

A: Please report any questions or concerns to Jasmine Sessoms, HRP's SVP of Corporate Affairs, at (215) 907-8345.

Q31: Is anyone representing the City Council, the Mayor's Office, or the Planning Commission present at this meeting?*

A: Representatives from those offices may have joined the meeting in the audience and were not speakers. This meeting was held in coordination with AMS (a City agency) as part of the Environmental Justice program in connection with the modified TVOPs.

Q32: Will HILCO monitor ambient air quality? I don't think the dust control permits require this, but there is concern about remaining VOCs, etc. being emitted during D & D*

A: Ambient air quality monitoring is not required under the current or modified Title V Operating Permits (TVOPs). However, the active decommissioning and demolition work is proceeding pursuant to appropriate permits issued by AMS including dust control permits and within asbestos monitoring requirements.

Q33: What about contaminants that are not LNAPL that may be stirred up during remediation? How are you keeping that contaminated water out of the sewers and Groundwater?

A: *HRP is actively coordinating with Evergreen, the party performing most on-site remediation, during NorthStar's performance of decommissioning and demolition of the site. During near-term decommissioning and deconstruction activities, stormwater will continue to be treated through the on-site wastewater treatment plants and will not be discharged to municipal storm drains or to groundwater. Long-term, HRP will be sampling stormwater as part of the overall development plan. Stormwater runoff that does not meet the requirements set by PADEP and/or the EPA will be treated or contained prior to entering public sewers or the Schuylkill River. HRP anticipates treatment either at a centralized location onsite prior to outfalls and/or on each individual development parcel within the park based on the sampling and feasibility of each treatment measure.*