pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

TO: Ragesh R. Patel
Regional Manager

FROM: Lisa Strobridge, PG
Licensed Professional Geologist

THRU: Richard M. Staron, PG
Licensed Professional Geologist Manager

Richard M. Staron Digitally signed by Richard M. Staron Date: 2022.06.06 09:10:26 -04'00'

DATE: June 3, 2022

RE: ECB – Storage Tank Cleanup Program
Chapter 245 Technical Memo Summary
Tank Group 1
Site Characterization Report and Remedial Action Plan
Philadelphia Refinery Point Breeze Processing Area
Facility ID No. 51-33620
3144 West Passyunk Avenue
City of Philadelphia

Owner/Remediator/Operator Name and Address:

Anne Garr, Esq.
Hilco Redevelopment Partners
111 S. Wacker Drive, Suite 3000
Chicago, IL 60606

Act 2 Standard(s) Sought:

Soil -
Nonresidential Statewide health standards (NR SHS): Short Lists 1-5 (Leaded Gasoline, Unleaded Gasoline, Fuel Oil No.1, Diesel Fuel, Fuel Oils 4,5, and 6).

Volatiles: *benzene, toluene, ethylbenzene, total xylenes, MTBE, naphthalene, cumene, 1,2,4-TMB, 1,3,5-TMB, EDB, EDC*
Semi volatiles: *anthracene, fluorene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, chrysene, phenanthrene, pyrene*
Inorganics*: lead*

Groundwater -
NR SHS: Short Lists 1-5

Volatiles: *benzene, toluene, ethylbenzene, total xylenes, MTBE, naphthalene, cumene, 1,2,4-TMB, 1,3,5-TMB, EDB, EDC*
Semi volatiles: *anthracene, fluorene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, chrysene, phenanthrene, pyrene*
Inorganics*: lead*

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Property Size: 8.7 acres

Project Site History:

Petroleum refining began at the Philadelphia Refinery from 1870 through 2019. The facility consisted of two refineries, Point Breeze operated by Atlantic Petroleum Corporation (formerly ARCO) and Girard Point by Chevron (formerly Gulf). Sunoco purchased these two refineries in 1988 and 1994 and consolidated them into a single facility. In 2012, Sunoco sold the refinery to the Carlyle Group and entered a joint venture to operate it as Philadelphia Energy Solutions (PES). Sunoco, Inc. is now a subsidiary of Energy Transfer Partners, L.P., and Evergreen is a Sunoco affiliate that is responsible for legacy environmental remediation. In 2020, PES was acquired by Hilco Redevelopment Partners (HRP). HRP is redeveloping the property into an industrial park.

In August 2020, PADEP was notified of HRP's intent to begin decommissioning the former refinery, and in December 2020, HRP submitted a site-specific aboveground storage tank (AST) closure soil sampling plan that divided the ASTs into eight tank groups. On April 23, 2021, PADEP approved the *Aboveground Storage Tank Closure Work Plan* (Work Plan), which defined the number of samples and sampling lists for each AST.

Tank Group 01 is located within the former Point Breeze Refinery North Yard (North Yard), No. 3 Tank Farm, and is also located within Evergreen's AOI-8 designation (PF 749898). On June 23, 2021, PADEP was notified of a confirmed release as indicated in closure soil sample results collected from PB-668 (0080), PB-666 (043A), and PB-663 (074A) for various Short List 1-5 compounds. PB-672 (PADEP #044A) is also located within Tank Group 1, but closure samples collected from PB-672 (PADEP #044A) met applicable NR SHS. Prior to demolition, the primary products held within these tanks were: Heavy Gas Oil (PB 663 and PB 666), Light Cycle Oil (PB 668) and Vacuum Oil (PB 672).

Specific redevelopment details (building placement, cut/fill areas, pavement, etc.) for the Tank Group 1 footprint have not been finalized at the time of this SCR and RAP submittal.

Site Findings:

General Information:

- Unconsolidated materials extend to approximately 30-80 feet below grade and consist of fill (up to 25 ft), alluvium (silt, clay, and sand), the Trenton Gravel, and the Potomac-Raritan-Magothy (PRM) formations (sand and clay units) in the portion of AOI-8 where Tank Group 1 is located. It is noted that the Upper Clay Unit is not continuous in this area. The Wissahickon Formation underlies the unconsolidated materials.
- The property is also underlain by historical fill material, which was placed for the purpose of reclaiming lowlands along the banks of the tidal Delaware and Schuylkill Rivers during industrialization.

Soil:

- Soil borings installed to delineate impacts in Tank Group 1 were predominately installed to a target depth of 5 feet below grade, with targeted supplemental borings installed to maximum depths of 15 feet to vertically delineate soil impacts.
- Fill materials were reportedly encountered in all borings.

- A total of 69 soil borings were installed using a combination of direct push drilling technologies and hand augers for AST closure assessment samples.
- A total of 100 soil samples were collected from Tank Group 1 for both AST Closure Sampling and subsequent delineation.
    - 71 samples were collected during AST closure activities including 2 duplicate samples
        - Most AST closure samples were collected from May 18, 2021 to May 20, 2021 and additional samples were collected on January 17, 2022 after the double bottom tank bottom was removed from PB-666 (043-A)
    - 29 additional samples were collected to laterally and vertically characterize soil impacts identified from the AST closure samples.
        - The characterization samples were collected from November 29, 2021 to December 1, 2021.
- For the AST closure assessment samples, soil was reportedly field screened with a photoionization detector (PID) and the depth with the maximum PID response was submitted for laboratory analysis of Short List 1-5 compounds; however, a review of subsurface logs indicated this procedure was not consistently implemented. At locations where there was no PID response (0 ppm), the soil samples were proposed to be collected from a depth of 3-3.5 ft below grade.
    - AST closure assessment samples collected from depths of 1 ft below grade are needed for multiple locations at each of the four tanks where product line samples were collected from deeper intervals.
    - AST closure assessment samples that were designated as AST sample locations should have been sampled at a depth of 3 ft below grade.
    - Deviations from the AST Closure Requirements should have been explained and prior approval received. A review of the subsurface logs did not indicate a consistent basis for deviation, and it was observed that field screening was not consistently conducted throughout the boreholes. An explanation of deviations is needed for approval and/or re-sampling may be required following review of an explanation of deviations.
- An oily sheen or oil stained soil was observed during site assessment activities.
    - An “oily sheen” or “oil sheen” was noted in subsurface logs for PB-666-06 at 3-3.5 ft, PB-666-24 at 3.5-4 ft, and PB-668-06 at 2.5-3 ft on May 19, 2021.
        - The interval that the oil sheen was observed was not sampled.
        - PADEP was not notified within 24-hours of this obvious contamination field observation consistent with the AST Closure Requirements.
    - “Oil stained soil” was noted in subsurface logs for PB-666-12 at 2.5-3ft on May 18, 2021.
        - PADEP was not notified within 24-hours of this obvious contamination field observation consistent with the AST Closure Requirements.
    - “Staining” was noted in subsurface logs for PB-666-17 at 3.5 to 4 ft on May 18, 2021 and PB-666-21R at 6-6.5 ft on December 20, 2021.
        - PADEP was not notified within 24-hours of this obvious contamination field observation consistent with the AST Closure Requirements.
    - “Light oil staining” or “oil staining” was noted in subsurface logs for PB-666-21 at 4.5 to 5 ft on May 18, 2021 and PB-672-12 at 4.5-5 ft on May 20, 2021.

  - PADEP was not notified within 24-hours of this obvious contamination field observation consistent with the AST Closure Requirements.

- Soil results exceeded applicable SHS MSCs at the following locations:
  - PB-663 (074A)
    - Lead exceeded direct contact and/or soil to groundwater SHS MSCs in 9 closure assessment samples (PB-663-01, PB-663-02, PB-663-03, PB-663-04, PB-663-07, PB-663-09, PB-663-10, PB-663-11, PB-663-12).
      - PB-663-01 and PB-663-02 were product line samples, however the assessment sample depths were 3-3.5', so it is not known if surface soil impacts are present at these locations. Lead delineation samples were attempted to the west (PB-663-15), however samples collected from PB-663-15 from 0-0.5 ft, 3-3.5 ft, and 6-6.5 ft interval exceeded the soil to groundwater SHS MSC. A soil sample from 14.5-15 ft interval met the soil to groundwater SHS MSC for vertical delineation.
      - PB-663-16 and PB-663-17 were installed to delineate lead impacts north of PB-663 and both of these samples contained concentrations of lead above soil to groundwater SHS MSCs in samples collected at 0-0.5 ft, but deeper samples (3-3.5 ft and 6-6.5 ft in PB-663-16 and PB-663-17, respectively) met applicable standards.
      - Lead delineation west of PB-663-15 and north of PB-663-16 and PB-663-17 beyond the dike area is needed to delineate soil to groundwater SHS MSCs for lead in Tank Group 1.
    - 1,2-EDB detection limits were higher than the soil to groundwater MSC in PB-663-02 and is considered an exceedance.
      - The 1,2-EDB detection limit exceedance at PB-663-02 was not further delineated.

  - PB-666 (043A)
    - Lead exceeded direct contact and/or soil to groundwater SHS MSCs in 10 closure assessment samples (PB-666-01-SS01, PB-666-02-SS01, PB-666-03-SS01, PB-666-04-SS01, PB-666-06-SS01, PB-666-12-SS01, PB-666-15-SS01, PB-666-16-SS01, PB-666-17-SS01, and PB-666-21-SS01)
      - Additional lateral delineation is needed to the north, south, and east for PB-666-21 at the 0-0.5 ft and 6-6.5 ft intervals.
      - Additional lateral delineation is needed to the east for PB-666-15, PB-666-16, and PB-666-17 at the 3-4 ft interval.
      - Vertical lead delineation is needed at PB-666-01, PB-666-02, PB-666-03, PB-666-04, PB-666-06, PB-666-15, PB-666-16, and PB-666-17.
    - Benzene was detected in PB-666-11 at 3.5-4 ft and PB-666-20 at 3.5-4 ft at concentrations above the soil to groundwater SHS MSCs.
      - This benzene exceedance is sufficiently laterally delineated.
      - The benzene exceedance was vertically delineated with soil samples below SHS MSCs at the 0-0.5 ft and 6-6.5 ft intervals in subsequent samples.
    - 1,2-EDB detection limits were higher than the soil to groundwater MSC in PB-666-07-SS01, PB-666-11-SS01, PB-666-12-SS01, PB-666-20-SS01

- The 1,2-EDB detection limit exceedance at PB-666-07-SS01, PB-666-11-SS01, PB-666-12-SS01, PB-666-20-SS01 were not further delineated.

- Toluene exceeded the soil to groundwater SHS MSCs in AST closure assessment sample PB-666-20-SS01 at 3.5-4 ft.
  - This toluene exceedance is sufficiently laterally delineated.
  - The toluene exceedance was vertically delineated with soil samples below SHS MSCs at the 0-0.5 ft and 6-6.5 ft intervals.
- Benzo(a)pyrene was detected above the soil to groundwater SHS MSC in PB-666-11 at 3.5-4 ft and PB-12 at 2.5-3 ft.
  - Each location was subsequently vertically delineated as soil samples met SHS MSCs at the 0-0.5 ft and 6-6.5 ft intervals.
  - These benzo(a)pyrene exceedances were sufficiently laterally delineated.
- Naphthalene was detected above the soil to groundwater SHS MSC in PB-666-12 at 2.5-3 ft.
  - Each location was subsequently vertically delineated as soil samples met SHS MSCs at the 0-0.5 ft and 6-6.5 ft intervals.
  - This naphthalene exceedance was sufficiently laterally delineated.

- PB-668 (0080)
  - Petroleum odor was noted in PB-668-07 at 2.5 to 3ft and was not sampled.
  - Lead exceeded direct contact and/or soil to groundwater SHS MSCs in PB-668-02 at 3-3.5 ft and in PB-668-03 at 1.5-2 ft.
    - Vertical delineation is needed at each location.
    - Additional lateral delineation is needed to the north and east for PB-668-02 and to the north, east and west for PB-668-03 at 1.5-2 ft.
  - 1,2-EDB detection limits were higher than the soil to groundwater MSC in PB-668-06 and is considered an exceedance.
    - The 1,2-EDB detection limit exceedance at PB-668-06 was not further delineated.
  - Benzo(a)pyrene exceeded the soil to groundwater SHS MSCs in PB-668-06 at 2.5-3 ft.
    - The exceedance was subsequently vertically delineated as soil samples met SHS MSCs at the 0-0.5 ft and 6-6.5 ft intervals.
    - This benzo(a)pyrene exceedance was sufficiently laterally delineated.
  - Naphthalene exceeded both the direct contact and soil to groundwater SHS MSCs in PB-668-06 at 2.5-3 ft.
    - The exceedance was subsequently vertically delineated as soil samples met SHS MSCs at the 0-0.5 ft and 6-6.5 ft intervals.
    - This naphthalene exceedance was sufficiently laterally delineated.

- B-672 (044A)
  - Soil lithology was not described for PB-672-11.
  - All soil samples associated with this tank met both direct contact and soil to groundwater SHS MSCs.

- It was noted in the report text that benzo(a)fluoranthene was identified as a COC for tanks PB-666 and PB-668, however no exceedances of the SHS MSCs were observed.
- Contaminant distribution maps were not included.

Groundwater:

- Two aquifers have been historically documented at the site.
  - An unconfined shallow aquifer occurs within the Holocene and Trenton Gravel deposits.
  - A deeper semi-confined aquifer is present within the Farrington Sand and is part of the PRM aquifer system. The deeper groundwater unit is separated by a clay unit.
- Groundwater is first encountered in the vicinity of Tank Group 1 at depths ranging from 9 ft to 19 ft below ground surface (bgs), as reported in historical AOI-8 monitoring well data for wells located in proximity to Tank Group 1.
- Groundwater monitoring wells were not installed to evaluate soil to groundwater impacts associated with AST removal activities for benzene, 1,2-EDB, toluene, naphthalene, benzo(a)pyrene, and lead.
- The report indicates that groundwater impacts associated with AST closure activities do not warrant further evaluation as supported by the following lines of evidence:
  - a historical benzene dissolved plume is present in Tank Group 1 and the presence of benzene is a proxy for other petroleum compounds.
  - light non-aqueous phase liquids (LNAPL) is present east of Tank Group 1.
  - dissolved lead was present in wells to the north and west of Tank Group 1 at concentrations above the groundwater SHS MSCs.
  - a former lead smelter was historically present in the area.
- PADEP does not concur with the technical basis provided for not evaluating groundwater.
  - A groundwater investigation is required to evaluate potential groundwater impacts for each COC. Use of a proxy contaminant is not appropriate given that VOCs, SVOCs, and metals have different physical, chemical, and transport properties in the environment.
  - The presence of LNAPL east of Tank Group 1 does not exclude the possible contributions of impacts from the ASTs. Additional lines of evidence, such as forensic sampling, are needed.
  - An evaluation of the presence of lead in groundwater, considering groundwater flow direction, is needed to further support the basis of a historical condition.
  - An assessment of the contribution of impacts to groundwater from the soil samples collected during AST closure activities is needed.
  - The location of the former lead smelter located north of Tank Group 1 was not presented in the context of implications for other historical AOI-8 lead sample results, or implications of lead results observed in Tank Group 1.
  - Local groundwater flow was not presented as part of the report.

LNAPL:

- Oil sheen was noted in soil subsurface logs but was not further evaluated.

Surface Water:

- The potential for surface water impacts were not evaluated as part of this report.

Vapor Intrusion:

- Soil samples were screened against nonresidential vapor intrusion screening values.
    - Benzene concentrations exceeded the vapor intrusion screening values at PB-666-11 at 3.5-4 ft and PB-666-20 at 3.5-4 ft.
    - The detection limit 1,2 EDB exceeded the screening level in PB-663-02, PB-663-14, PB-666-07-SS01, PB-666-11-SS01, PB-666-12-SS01, PB-666-20-SS01, PB-668-06-SS01,
    - The detection limit 1,2 EDC exceeded the screening level in PB-663-02, PB-666-07-SS01, PB-666-11-SS01, PB-666-12-SS01, PB-666-20-SS01, PB-668-06-SS01,
    - Naphthalene and 1,2,4-TMB concentrations exceeded the VI screening levels in PB-668-06-SS01.
- The vapor intrusion pathway is currently incomplete as there are no occupied structures in Tank Group 1.
- Reference is made to PESRM evaluating future vapor intrusion pathways as part of future redevelopment, however, an understanding of how this exposure pathway will be addressed is required as part of the statewide health standard RAP.
    - Hilco is required to address the potential future vapor intrusion impact associated with the AST closure exceedances in the RAP since Statewide health standards are selected.

Ecological:

- The report indicates Tank Group 1 screens out of a SHS ecological assessment given that the area of impacted soil is less than 2 acres and the COCs are related to only light petroleum products.
- PADEP does not concur that only light petroleum products are the source of COCs given the reported tank use Heavy Gas Oil (PB 663 and PB 666), Light Cycle Oil (PB 668) and Vacuum Oil (PB 672).
- The area of impacted soil with respect to ecological assessment under SHS will need to be re-evaluated when soil delineation is complete.

Site Cleanup History:

Incident Number(s): 56446
Confirmed Release Date(s): verbal June 23, 2021, written July 2, 2021
SCR: submitted February 21, 2022. This SCR is being reviewed along with the RAP.
RAP: was due and received on April 7, 2022. The SCR and RAP are being reviewed.
COA: PADEP and PESRM entered into a COA on January 15, 2020 and as approved on January 22, 2020 by the U.S. Bankruptcy Court for the District of Delaware. The COA has been amended on seven occasions.
Soil Management Plan: A Soil Management Plan, dated June 15, 2020 and approved by PADEP on June 18, 2020 describes how HRP will take a site specific approach to characterizing impacted soil, categorize soil for reuse at the site, manage contaminated soil and waste, integrate site grading with site remedy implementation, and perform the work in a manner consistent with Act 2 cleanup requirements.

Aboveground Storage Tank Closure Work Plan: A site specific Aboveground Storage Tank Closure Work Plan was approved by PADEP on April 23, 2021 and outlines the concept of sampling and reporting by Tank Groups, as well as clarifies the sampling to be conducted at tanks and below product lines.
AST Closure Reports: AST Closure Reports for Tank Group 1 were submitted to PADEP under a separate cover on May 10, 2022. On May 17, 2022, HRP and their consultant were notified that these reports were incomplete. The following omissions were noted:

1. Sample depths should be clearly identified for all samples so the correct standards can be applied.
2. Disposition of the tanks and piping and documentation need to be provided.
3. Disposition and amount of uncontaminated soil and debris needs to be identified/described or checked as not applicable.
4. Color photographs of the tank closure were not provided.
5. Documentation of proper disposal of waste generated during tank closure was not provided.
6. Documentation of disposition of usable product drained from tanks during closure was not provided.
7. Clarification if soil or other backfill material was excavated as part of the closures and, if so, the initial staging of those materials and their final disposition.

The revised AST Closure Reports have not been received by PADEP as of June 2, 2022.

Discussion of Cleanup Involved:

- The RAP indicates one of two remedies will be selected: 1) impacted soil above synthetic precipitation leaching procedure (SPLP) soil specific SHS will be excavated and transported offsite for disposal or 2) soil will be managed under the Soil Management Plan previously approved for the site.
    - The RAP indicates SHS selection, so consideration of use of the Soil Management Plan is not appropriate given the Soil Management Plan is a site-specific standard approach.
    - The RAP also indicates that alternative SHS will be proposed based on future synthetic precipitation leaching procedure (SPLP) results and the proposed volume of soil to be excavated will be determined based on the soil specific SPLP SHS.
        - The SPLP sampling was not conducted at the time of the RAP submittal to know what the alternative SHS will be for each COC.
        - SPLP sampling was proposed for benzene, toluene, and naphthalene, but not for 1,2 EDB, benzo(a)pyrene, or lead.
            - It is stated that "lead impacts in soil will be addressed under Act 2 by Evergreen in accordance with the 2012 Buyer-Seller Agreement and the 2020 First Amendment to that Agreement".
                - It is not clear to PADEP if these lead impacts in soil to be addressed by Evergreen include impacts to Tank Group 1 since the impacts in that specific area were not known at the time of the execution of the agreement.
            - A plan to address 1,2 EDB and benzo(a)pyrene impacts is needed.

  - A plan for post-excavation sampling was proposed to include random systematic soil sampling for the appropriate soil volumes required in 25 Pa. Code Section 250.707(b)(1)(i).
  - No post remediation care requirements are anticipated for a soil excavation remedy.
    - Post remediation care requirements are anticipated for a Soil Management Plan remedy, however, use of this remedy needs to be submitted via a site-specific site characterization report and remedial action plan.
- Figures outlining the extent of the remedy needed can't be reviewed and commented on until site characterization is complete.
- The vapor intrusion pathway was not considered as part of the remedy selection.

PADEP Final Action Decision:

The February 21, 2022 SCR and April 7, 2022 RAP are recommended for disapproval due to the following deficiencies:

1. Complete AST Closure Reports were not submitted as part of the SCR, so the sources of contamination could not be determined or confirmed as required by 25 Pa. Code Section 245.309(a) and (b)(3), as referenced by 25 Pa. Code Section 245.310(a).
2. A statement certifying that a site-specific plan was implemented in accordance with OSHA requirements in 29 CFR 1910.120 was not included in the SCR, as required by 25 Pa. Code Section 245.310(a)(11).
3. Site characterization was not complete as required by 25 Pa. Code Section 245.309(b), as referenced by 25 Pa. Code Section 245.310(a)(12). AST Closure samples were not consistently collected from the appropriate depths, resulting in incomplete soil delineation at the 1-foot and 3-foot intervals in select locations at all four tank areas. In addition, soil delineation was not complete for lead or 1,2-EDB around tanks PB-663, PB-666, or PB-668. Lastly, potential impacts to groundwater were not sufficiently evaluated.
4. Groundwater contour maps were not included as required by 25 Pa. Code Section 245.310(a)(16).
5. Contaminant distribution maps were not included for soil as required by 25 Pa. Code Section 245.310(a)(22).
6. The disposition of characterization wastes was not documented as required by 25 Pa. Code Section 245.310(a)(24) as disposal documentation was missing from the AST Closure Reports.
7. A future remedy option of managing impacted soil consistent with the approved Soil Management Plan is not a Statewide health standard remedy and does not satisfy the requirements of 25 Pa. Code Sections 245.310(a)(30).
8. The future vapor intrusion exposure pathway was not addressed, as required by 25 Pa. Code Sections 245.309(c)(12), as referenced by 25 Pa. Code Section 245.310(a), and 245.310(a)(32).
9. DEP cannot fully evaluate the RAP until and approvable SCR is submitted. However, DEP notes the following: The RAP does not sufficiently explain how the proposed remedial action will meet the selected Statewide health standard as required by 25 Pa. Code Section 245.311(a)(4).

   a. The proposed SPLP sampling has not been conducted to determine the soil specific SHS for each COC, and to know if this is a viable approach. The proposed limits of excavation may change pending the SPLP results. In addition, the alternative remedy of soil management consistent with the approved Soil Management Plan is a site-specific standard remedy and cannot be used for sites where Statewide health standards are selected.
   b. It is not clear to PADEP if these lead impacts in soil to be addressed by Evergreen include impacts to Tank Group 1 since the impacts in that specific area were not known at the time of the execution of the agreement.
   c. A plan to address 1,2 EDB and benzo(a)pyrene impacts is needed.
   d. The vapor intrusion pathway was not considered as part of the remedy selection.
10. Soil lithology was not described for PB-672-11 in accordance with 25 Pa. Code Section 245.310(a)(14).
11. The potential for surface water impacts were not evaluated as part of this report in accordance with 25 Pa. Code Section 245.310(a)(29).
12. The area of impacted soil with respect to ecological assessment under SHS was not evaluated in accordance with 25 Pa. Code Section 245.310(a)(28).

In addition to the above deficiencies, additional clarification is needed for the following item:

1. Addressing the presence of obvious contamination in field observations, but not reporting the condition to PADEP or sampling each location where it was observed.

The deficiencies associated with the proposed SPLP sampling, need to provide all sampling results as part of the SCR/RAP submittal, and use of the Soil Management Plan as a site-specific remedy were communicated to HRP and Terraphase throughout multiple conversations in May 2022. On June 2, 2022, discussing these deficiencies in detail was offered to HRP, but due to scheduling conflicts, it was determined that the deficiencies would be discussed during the bi-weekly call scheduled for June 8, 2022. PADEP also indicated that this technical memo would be shared with Hilco and Terraphase following distribution of the decision letter.

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