



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19103-2029



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

**PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
LAND RECYCLING PROGRAM**

400 Market Street
Harrisburg, PA 17105-8471

Mr. Steve Cassidy
Property Owner
601 Spruce Street Investment Partners, LLC
270 West Walnut Lane
Philadelphia, PA 19144

Re: 601 Spruce Street property
Pennsylvania One Cleanup Program

Dear Mr. Steve Cassidy:

The United States Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Protection (DEP) acknowledge your interest in completing the environmental cleanup at the 601 Spruce Street site located Perkasie, PA as identified by your Notice of Intent to Remediate (NIR) submitted on September 17, 2020. DEP and EPA have developed an approach to conducting such work at RCRA facilities which we refer to as the One Cleanup Program.

EPA and DEP signed a *One Cleanup Program Memorandum of Agreement* (MOA) on April 21, 2004. The MOA provides a streamlined approach for Pennsylvania facilities with corrective action obligations under the Resource Conservation and Recovery Act (RCRA) to complete federal corrective action and, concurrently, receive a liability release from Pennsylvania. The EPA agrees to your participation in the One Cleanup Program per your wish to select this option within the NIR.

On June 1, 2020, 601 Spruce Street Investment Partners, LLC entered into a consent order and agreement with DEP under the Hazardous Sites Cleanup Program requiring you to file an Act 2 notice of intent to remediate, submit Act 2 reports, and demonstrate attainment of an Act 2 cleanup standard for the site.

The project managers for your facility are Lena Harper, DEP and Tran Tran, EPA. Their



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job is to work with you to coordinate the review and approval process to make certain that the requirements of both programs are met. The DEP project manager will have the overall lead, while EPA will be responsible for addressing RCRA issues, including a determination of the environmental indicators for human health and groundwater control.

Upon completion and submittal of the Remediation and Investigation Report (RIR), all parties will discuss the appropriate next steps and schedules. Where possible, we will rely on Act 2's Statewide Health or site specific options to develop a remedy. We also plan to follow Act 2 time frames as much as possible. If these options do not fully satisfy RCRA requirements, we expect the parties to develop an acceptable alternative.

Once agreement is reached on any necessary cleanup, EPA will publish a draft Final Decision for public input and proceed to a final Decision using EPA's ***Final Guidance on Completion of Corrective Action Activities at RCRA Facilities***, which can be found in the February 23, 2003 ***Federal Register***. DEP will proceed with a review and an approval decision on the Act 2 reports as provided in Act 2, Sections 302(e), 303(h) and 304(n). Responsibility for any post-remedial measures or institutional controls will be determined by the joint work team on a facility-specific basis in order to ensure the needs of both programs are met.

For your convenience, the full text of the MOA can be found at the following link:
<http://www.epa.gov/region03/revitalization/pennsylvania.htm>

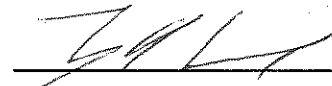
Both EPA and DEP look forward to working with 601 Spruce Street Investment Partners, LLC to achieve an effective cleanup that will protect human health and the environment while providing an efficient, streamline process. For more information please contact Lena Harper, DEP at (484) 250-5721 or Ms. Tran Tran, EPA at (215) 814-2079.

Sincerely,

Olhasso,
Alizabeth

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Alizabeth
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Alizabeth Olhasso, Acting Chief
Land, Chemicals & Redevelopment Division
Region III
US Environmental Protection Agency



Troy Conrad, Director
Bureau of Environmental Cleanup and Brownfields
Department of Environmental Protection

Cc: Tran Tran, EPA
C. David Brown, PADEP
Lena Harper, PADEP
Ragesh Patel, PADEP