



SPRINGFIELD TOWNSHIP

MONTGOMERY COUNTY, PENNSYLVANIA

1510 Paper Mill Road, Wyndmoor, PA 19038

www.springfieldmontco.org

EPA BROWNFIELDS CLEANUP GRANT APPLICATION FUNDING OPPORTUNITY: EPA-OLEM-OBLR-20-07

NARRATIVE INFORMATION SHEET

IV.D.1 Applicant Identification

Springfield Township, Montgomery County
1510 Paper Mill Road
Wyndmoor, PA 19038-7032
Applicant DUNS: 025589409

IV.D.2. Funding Requested

IV.D.2.a. Grant Type:

SINGLE SITE CLEAN-UP

IV.D.2.b. Federal Funds Requested

IV.D.2.b.i Funds Requested:

\$332,620

IV.D.2.b.ii Cost Share Waiver:

Springfield Township is NOT requesting a cost share waiver.

IV.D.3. Location:

Springfield Township,
Montgomery County, Pennsylvania

IV.D.4. Property Information:

Former Tank Car Corp. of America (TCCA) Site
1725 Walnut Avenue, Oreland, PA 19075

IV.D.5. Contacts

IV.D.5.a. Project Director

Brandon Ford, Assistant to the Manager
Springfield Township
1510 Paper Mill Road, Wyndmoor, PA 19038
Phone: 215.936.7600
Email: bford@springfieldmontco.org

IV.D.5.b. Chief Executive/ Highest Ranking Elected Official

Michael Taylor, Township Manager,
Springfield Township
1510 Paper Mill Road, Wyndmoor, PA 19038
Phone: 215.936.7600
Email: mtaylor@springfieldmontco.org

IV.D.6. Population

19,418 (U.S. Census 2010)

IV.D.7. Other Factors Checklist

IV.D.7. Other Factors Checklist

Other Factors		Page #
Community population is 10,000 or less.		N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory		N/A
The proposed brownfield site(s) is impacted by mine-scarred land		N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation		Secured resource is identified in the Narrative on Pages 3-4
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).		N/A
The proposed site(s) is in a federally designated flood plain.		N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.		N/A

IV.D.8. Letter from the State or Tribal Environmental Authority

Attached is a letter from the Pennsylvania Department of Environmental Protection (DEP) dated October 4, 2019 approving a work plan developed by BL Companies on behalf of Springfield Township.

The work plan sets forth the plan for assessing and remediating the former TCCA property in adherence to the requirements outlined in the Land Recycling and Environment Remediation Standards Act (Act 2).

Sections 2.4, 3.3 and 3.4 of the work plan directly detail the remediation and demolition of on-site structures, activities which serve as the basis for this clean-up grant application.



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

October 4, 2019



Mr. Donald E. Berger, Jr., Township Manager
Springfield Township
1510 Paper Mill Rd.
Wyndmoor, PA 19038-7032

Re: Approval of ISRP Work Plan
Tank Car Corporation of America
eFACTS PF ID No. 818846
1725 Walnut Ave.
Springfield Township
Montgomery County

Dear Mr. Berger:

The Department of Environmental Protection (DEP) has reviewed the April 1, 2019, document titled "Revised Work Plan for Site Assessment Activities", amended July 10, September 5, and September 19, 2019, for the property referenced above. The work plan was prepared by BL Companies Pennsylvania, Inc. The plan was submitted to DEP for the Industrial Sites Reuse Program of the Department of Community and Economic Development. DEP reviewed the plan pursuant to the requirements of the Land Recycling and Environmental Remediation Standards Act (Act 2).

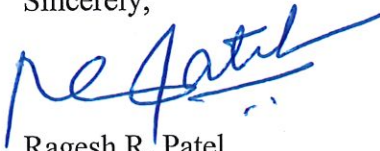
The plan proposes to:

1. install 18 soil borings around the site perimeter, to 15'-16' below ground surface;
2. collect shallow and deep soil samples from the 18 borings;
3. analyze shallow and deep soil samples for the same analytical suites that were analyzed previously;
4. install four new shallow groundwater monitoring wells, to 50 feet below ground surface;
5. collect four quarterly water samples from each of six existing and four new wells;
6. analyze the water samples for "VOCs, SVOCs, and dissolved priority pollutant metals";
7. install three (deeper than 50 feet below ground surface) groundwater monitoring wells;
8. prepare and submit to the Department a Remedial Investigation Report;
9. survey the property for hazardous materials.

DEP hereby approves the work plan based on the information provided. We look forward to receiving an eventual final report demonstrating attainment of a cleanup standard for the site.

If you have any questions or need further information regarding this matter, please feel free to contact Sarah Pantelidou, P.G. by email at spantelido@pa.gov or by telephone at 484.250.5778.

Sincerely,



Ragesh R. Patel
Regional Manager
Environmental Cleanup and Brownfields

cc: Mr. Yoder, P.G., BL
Mr. Eckert—DCED
Ms. Pantelidou, P.G.
Mr. Brown, P.G.
Mr. Cherry
Mr. Kelly, EPA
Mr. Gross
Regional File
Re 30 (hmw19ecb) 277-3

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Township of Springfield

* b. Employer/Taxpayer Identification Number (EIN/TIN):

23-6001928

* c. Organizational DUNS:

025589409

d. Address:

* Street1:

1510 Paper Mill Rd.

Street2:

* City:

Glenside

County/Parish:

* State:

PA

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

19038-7032

e. Organizational Unit:

Department Name:

Office of the Manager

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Brandon

Middle Name:

* Last Name:

Ford

Suffix:

Title:

Assistant to the Manager

Organizational Affiliation:

Springfield, Township of

* Telephone Number:

215-836-7600

Fax Number:

* Email: bford@springfieldmontco.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Grants

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-20-07 for Cleanup Grants

* Title:

FY21 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Springfield Township's Brownfields Clean-up Grant for the Former Tank Car Corporation of America (TCCA) site seeks \$352,036 in federal funding to abate and demolish five abandoned, former industrial structures containing hazardous materials located on Township property as a prerequisite for the eventual redevelopment of the site into a public park.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

PA 4

* b. Program/Project

PA 4

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/1/21

* b. End Date:

9/30/24

18. Estimated Funding (\$):

* a. Federal

\$352,036

* b. Applicant

* c. State

* d. Local

\$88,009

* e. Other

* f. Program Income

* g. TOTAL

\$440,045

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Brandon

Middle Name:

* Last Name:

Ford

Suffix:

* Title:

Assistant to the Manager

* Telephone Number:

215-836-7600

Fax Number:

* Email:

bford@springfieldmontco.org

* Signature of Authorized Representative:

Brandon J. Ford

Digitally signed by Brandon J. Ford
DN: cn=Brandon J. Ford, o=ou,
email=bford@springfieldmontco.org, c=US
Date: 2020.10.27 12:12:49 -04'00'

* Date Signed:

10/27/20

Applicant Name: Township of Springfield

Award Number: _____

Budget Information - Non Construction Programs

OMB Approval No. 0348-0044

Section A - Budget Summary						
Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Brownfields Cleanup Grants	66.818			\$ 332,620		\$332,620
2. Brownfields 66.818 Cleanup Grants - Cost Share	66.818				\$83,155	\$83,155
3.						\$0
4.						\$0
5. Totals		\$0	\$0	\$332,620	\$83,155	\$415,775
Section B - Budget Categories						
6. Object Class Categories	Grant Program, Function or Activity				Total (5)	
	(1) Federal Fund Request	(2) Local Cost Share	(3)	(4)		
a. Personnel	\$0	\$0	\$0	\$0	\$0	
b. Fringe Benefits	\$0	\$0	\$0	\$0	\$0	
c. Travel	\$0	\$0	\$0	\$0	\$0	
d. Equipment	\$0	\$0	\$0	\$0	\$0	
e. Supplies	\$0	\$0	\$0	\$0	\$0	
f. Contractual	\$ 332,620	\$83,155	\$0	\$0	\$415,775	
g. Construction	\$0	\$0	\$0	\$0	\$0	
h. Other	\$0	\$0	\$0	\$0	\$0	
i. Total Direct Charges (sum of 6a-6h)	\$332,620	\$83,155	\$0	\$0	\$415,775	
j. Indirect Charges	\$0	\$0	\$0	\$0	\$0	
k. Totals (sum of 6i-6j)	\$332,620	\$83,155	\$0	\$0	\$415,775	
7. Program Income					\$0	

Section C - Non-Federal Resources					
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) Totals	
8.	\$0	\$0	\$0	\$0	
9.	\$0	\$0	\$0	\$0	
10.	\$0	\$0	\$0	\$0	
11.	\$0	\$0	\$0	\$0	
12. Total (sum of lines 8 - 11)	\$0	\$0	\$0	\$0	
Section D - Forecasted Cash Needs					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th quarter
13. Federal	\$332,620	\$29,220	\$95,200	95200	\$113,000
14. Non-Federal	\$83,155	\$7,305	\$23,800	23800	\$28,250
15. Total (sum of lines 13 and 14)	\$415,775	\$36,525	\$119,000	\$119,000	\$141,250
Section E - Budget Estimates of Federal Funds Needed for Balance of the Project					
(a) Grant Program	Future Funding Periods (Years)				
	(b) First	(c) Second	(d) Third	(e) Fourth	
16.	\$0	\$0	\$0	\$0	
17.	\$0	\$0	\$0	\$0	
18.	\$0	\$0	\$0	\$0	
19.	\$0	\$0	\$0	\$0	
20. Total (sum of lines 16-19)	\$0	\$0	\$0	\$0	
Section F - Other Budget Information					
21. Direct Charges \$415,775.00		22. Indirect Charges			
23. Remarks					

Instructions for the SF-424A

Public Reporting Burden for this collection of information is estimated to average 3.0 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Please do not return your completed form to the Office of Management and Budget; send it to the address provided by the sponsoring agency.

General Instructions

This form is designed so that application can be made for funds from one or more grant programs. In preparing the budget, adhere to any existing Federal grantor agency guidelines which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, grantor agencies may require budgets to be separately shown by function or activity. For other programs, grantor agencies may require a breakdown by function or activity. Sections A, B, C, and D should include budget estimates for the whole project except when applying for assistance which requires Federal authorization in annual or other funding period increments. In the later case, Sections A, B, C, and D should provide the budget for the first budget period (usually a year) and Section E should present the need for Federal assistance in the subsequent budget periods. All applications should contain a breakdown by the object class categories shown in Lines a-k of Section B.

Section A. Budget Summary Lines 1-4 Columns (a) and (b)

For applications pertaining to a **single** Federal grant program (Federal Domestic Assistance Catalog number) and **not requiring** a functional or activity breakdown, enter on Line 1 under Column (a) the catalog program title and the catalog number in Column (b).

For applications pertaining to a **single** program **requiring** budget amounts by multiple functions or activities, enter the name of each activity or function on each line in Column (a), and enter the catalog number in Column (b). For applications pertaining to multiple programs where none of the programs require a breakdown by function or activity, enter the catalog program title on each line in **Column** (a) and the respective catalog number on each line in Column (b).

For applications pertaining to **multiple** programs where one or more programs **require** a breakdown by function or activity, prepare a separate sheet for each program requiring the breakdown. Additional sheets should be used when one form does not provide adequate space for all breakdown of data required. However, when more than one sheet is used, the first page should provide the summary totals by programs.

Lines 1-4, Columns (c) through (g)

For new applications, leave Columns (c) and (d) blank. For each line entry in Columns (a) and (b), enter in Columns (e), (f), and (g) the appropriate amounts of funds needed to support the project for the first funding period (usually a year).

For continuing grant program applications, submit these forms before the end of each funding period as required by the grantor agency. Enter in Columns (c) and (d) the estimated amounts of funds which will remain unobligated at the end of the grant funding period only if the Federal grantor agency instructions provide for this. Otherwise, leave these columns blank. Enter in columns (e) and (f) the amounts of funds needed for the upcoming period. The amount(s) in Column (g) should be the sum of amounts in Columns (e) and (f).

For supplemental grants and changes to existing grants, do not use Columns (c) and (d). Enter in Column (e) the amount of the increase or decrease of Federal funds and enter in Column (f) the amount of the increase or decrease of non-Federal funds. In Column (g) enter the new total budgeted amount (Federal and non-Federal) which includes the total previous authorized budgeted amounts plus or minus, as appropriate, the amounts shown in Columns (e) and (f). The amount(s) in Column (g) should not equal the sum of amounts in Columns (e) and (f).

Line 5—Show the totals for all columns used.

Section B. Budget Categories

In the column headings (a) through (4), enter the titles of the same programs, functions, and activities shown on Lines 1-4, Column (a), Section A. When additional sheets are prepared for Section A, provide similar column headings on each sheet. For each program, function or activity, fill in the total requirements for funds (both Federal and non-Federal) by object class categories.

Lines 6a-i—Show the totals of Lines 6a to 6h in each column.

Line 6j—Show the amount of indirect cost.

Line 6k—Enter the total of amounts on Lines 6i and 6j. For all applications for new grants and continuation grants the total amount in column (5), Line 6k, should be the same as the total amount shown in Section A, Column (g), Line 5. For supplemental grants and changes to grants, the total amount of the increase or decrease as shown in Columns (1)-(4), Line 6k should be the same as the sum of the amounts in Section A, Columns (e) and (f) on Line 5.

Line 7—Enter the estimated amount of income, if any, expected to be generated from this project. Do not add or subtract this amount from the total project amount. Show under the program narrative statement the nature and source of income. The estimated amount of program income may be considered by the federal grantor agency in determining the total amount of the grant.

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Prescribed by OMB Circular A-102

Section C. Non-Federal Resources

Lines 8-11—Enter amounts of non-Federal resources that will be used on the grant. If in-kind contributions are included, provide a brief explanation on a

Page 3 of 4

Section E. Budget Estimates of Federal Funds Needed for Balance of the Project

Lines 16-19—Enter in Column (a) the same grant program titles shown in

grant. If in-kind contributions are included, provide a brief explanation on a separate sheet.

Column (a)—Enter the program titles identical to Column (a), Section A. A breakdown by function or activity is not necessary.

Column (b)—Enter the contribution to be made by the applicant.

Column (c)—Enter the amount of the State's cash and in-kind contribution if the applicant is not a State or State agency. Applicants which are a State or State agencies should leave this column blank.

Column (d)—Enter the amount of cash and in-kind contributions to be made from all other sources.

Column (e)—Enter totals of Columns (b), (c), and (d).

Line 12—Enter the total for each of Columns (b)-(e). The amount in Column (e) should be equal to the amount on Line 5, Column (f) Section A.

Section D. Forecasted Cash Needs

Line 13—Enter the amount of cash needed by quarter from the grantor agency during the first year.

Line 14—Enter the amount of cash from all other sources needed by quarter during the first year.

Line 15—Enter the totals of amounts on Lines 13 and 14.

Lines 16-19—Enter in Column (a) the same grant program titles shown in Column

(a), Section A. A breakdown by function or activity is not necessary. For new applications and continuation grant applications, enter in the proper columns amounts of Federal funds which will be needed to complete the program or project over the succeeding funding periods (usually in years). This section need not be completed for revisions (amendments, changes, or supplements) to funds for the current year of existing grants.

If more than four lines are needed to list the program titles, submit additional schedules as necessary.

Line 20—Enter the total for each of the Columns (b)-(e). When additional schedules are prepared for this Section, annotate accordingly and show the overall totals on this line.

Section F. Other Budget Information

Line 21—Use this space to explain amounts for individual direct object-class cost categories that may appear to be out of the ordinary or to explain the details as required by the Federal grantor agency.

Line 22—Enter the type of indirect rate (provisional, predetermined, final or fixed) that will be in effect during the funding period, the estimated amount of the base to which the rate is applied, and the total indirect expense.

Line 23—Provide any other explanations or comments deemed necessary.

**Preaward Compliance Review Report for
All Applicants and Recipients Requesting EPA Financial Assistance**

Note: Read Instructions before completing form.

I. A. Applicant/Recipient (Name, Address, City, State, Zip Code)

Name:

Address:

City:

State: Zip Code:

B. DUNS No. **II. Is the applicant currently receiving EPA Assistance?** ☐ Yes ☒ No**III. List all civil rights lawsuits and administrative complaints pending against the applicant/recipient that allege discrimination based on race, color, national origin, sex, age, or disability. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7.)****IV. List all civil rights lawsuits and administrative complaints decided against the applicant/recipient within the last year that allege discrimination based on race, color, national origin, sex, age, or disability and enclose a copy of all decisions. Please describe all corrective actions taken. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7.)****V. List all civil rights compliance reviews of the applicant/recipient conducted by any agency within the last two years and enclose a copy of the review and any decisions, orders, or agreements based on the review. Please describe any corrective action taken. (40 C.F.R. § 7.80(c)(3))****VI. Is the applicant requesting EPA assistance for new construction? If no, proceed to VII; if yes, answer (a) and/or (b) below.**☐ Yes ☒ No**a. If the grant is for new construction, will all new facilities or alterations to existing facilities be designed and constructed to be readily accessible to and usable by persons with disabilities? If yes, proceed to VII; if no, proceed to VI(b).**☐ Yes ☐ No**b. If the grant is for new construction and the new facilities or alterations to existing facilities will not be readily accessible to and usable by persons with disabilities, explain how a regulatory exception (40 C.F.R. 7.70) applies.****VII. Does the applicant/recipient provide initial and continuing notice that it does not discriminate on the basis of race, color, national origin, sex, age, or disability in its program or activities? (40 C.F.R. 5.140 and 7.95)**☒ Yes ☐ No**a. Do the methods of notice accommodate those with impaired vision or hearing?**☒ Yes ☐ No**b. Is the notice posted in a prominent place in the applicant's offices or facilities or, for education programs and activities, in appropriate periodicals and other written communications?**☒ Yes ☐ No**c. Does the notice identify a designated civil rights coordinator?**☒ Yes ☐ No**VIII. Does the applicant/recipient maintain demographic data on the race, color, national origin, sex, age, or handicap of the population it serves? (40 C.F.R. 7.85(a))**☒ Yes ☐ No**IX. Does the applicant/recipient have a policy/procedure for providing access to services for persons with limited English proficiency? (40 C.F.R. Part 7, E.O. 13166)**☒ Yes ☐ No

- X. If the applicant is an education program or activity, or has 15 or more employees, has it designated an employee to coordinate its compliance with 40 C.F.R. Parts 5 and 7? Provide the name, title, position, mailing address, e-mail address, fax number, and telephone number of the designated coordinator.

Not applicable

- XI. If the applicant is an education program or activity, or has 15 or more employees, has it adopted grievance procedures that assure the prompt and fair resolution of complaints that allege a violation of 40 C.F.R. Parts 5 and 7? Provide a legal citation or Internet Address for, or a copy of, the procedures.

Not applicable

For the Applicant/Recipient

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. I assure that I will fully comply with all applicable civil rights statutes and EPA regulations.

A. Signature of Authorized Official

B. Title of Authorized Official

C. Date

Assistant to the Manager

10/27/20

For the U.S. Environmental Protection Agency

I have reviewed the information provided by the applicant/recipient and hereby certify that the applicant/recipient has submitted all preaward compliance information required by 40 C.F.R. Parts 5 and 7; that based on the information submitted, this application satisfies the preaward provisions of 40 C.F.R. Parts 5 and 7; and that the applicant has given assurance that it will fully comply with all applicable civil rights statutes and EPA regulations.

A. *Signature of Authorized EPA Official

B. Title of Authorized Official

C. Date

*** See Instructions**

Instructions for EPA FORM 4700-4 (Rev. 06/2014)

General. Recipients of Federal financial assistance from the U.S. Environmental Protection Agency must comply with the following statutes and regulations.

Title VI of the Civil Rights Acts of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Act goes on to explain that the statute shall not be construed to authorize action with respect to any employment practice of any employer, employment agency, or labor organization (except where the primary objective of the Federal financial assistance is to provide employment). Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act provides that no person in the United States shall on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Federal Water Pollution Control Act, as amended. Employment discrimination on the basis of sex is prohibited in all such programs or activities. Section 504 of the Rehabilitation Act of 1973 provides that no otherwise qualified individual with a disability in the United States shall solely by reason of disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Employment discrimination on the basis of disability is prohibited in all such programs or activities. The Age Discrimination Act of 1975 provides that no person on the basis of age shall be excluded from participation under any program or activity receiving Federal financial assistance. Employment discrimination is not covered. Age discrimination in employment is prohibited by the Age Discrimination in Employment Act administered by the Equal Employment Opportunity Commission. Title IX of the Education Amendments of 1972 provides that no person in the United States on the basis of sex shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Employment discrimination on the basis of sex is prohibited in all such education programs or activities. Note: an education program or activity is not limited to only those conducted by a formal institution. 40 C.F.R. Part 5 implements Title IX of the Education Amendments of 1972. 40 C.F.R. Part 7 implements Title VI of the Civil Rights Act of 1964, Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act, and Section 504 of The Rehabilitation Act of 1973. The Executive Order 13166 (E.O. 13166) entitled; "Improving Access to Services for Persons with Limited English Proficiency" requires Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Items "Applicant" means any entity that files an application or unsolicited proposal or otherwise requests EPA assistance. 40 C.F.R. §§ 5.105, 7.25. "Recipient" means any entity, other than applicant, which will actually receive EPA assistance. 40 C.F.R. §§ 5.105, 7.25. "Civil rights lawsuits and administrative complaints" means any lawsuit or administrative complaint alleging discrimination on the basis of race, color, national origin, sex, age, or disability pending or decided against the applicant and/or entity which actually benefits from the grant, but excluding employment complaints not covered by 40 C.F.R. Parts 5 and 7. For example, if a city is the named applicant but the grant will actually benefit the Department of Sewage, civil rights lawsuits involving both the city and the Department of Sewage should be listed. "Civil rights compliance review" means any review assessing the applicant's and/or recipient's compliance with laws prohibiting discrimination on the basis of race, color, national origin, sex, age, or disability. Submit this form with the original and required copies of applications, requests for extensions, requests for increase of funds, etc. Updates of information are all that are required after the initial application submission. If any item is not relevant to the project for which assistance is requested, write "NA" for "Not Applicable." In the event applicant is uncertain about how to answer any questions, EPA program officials should be contacted for clarification. * Note: Signature appears in the Approval Section of the EPA Comprehensive Administrative Review For Grants/Cooperative Agreements & Continuation/Supplemental Awards form.



U.S. ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

KEY CONTACTS FORM

Authorized Representative: *Original awards and amendments will be sent to this individual for review and acceptance, unless otherwise indicated.*

Name: Brandon Ford
 Title: Assistant to the Manager
 Complete Address: 1510 Paper Mill Road
Wyndmoor, PA 19036
 Phone Number: 215-836-7600

Payee: *Individual authorized to accept payments.*

Name: Michael Taylor
 Title: Township Manager
 Mail Address: 1510 Paper Mill Road, Wyndmoor, PA 19036
 Phone Number: 215-836-7600

Administrative Contact: *Individual from Sponsored Program Office to contact concerning administrative matters (i.e., indirect cost rate computation, rebudgeting requests etc.)*

Name: Brandon Ford
 Title: Assistant to the Manager
 Mailing Address: 1510 Paper Mill Road, Wyndmoor, PA 19036
 Phone Number: 215-836-7600
 FAX Number: _____
 E-Mail Address: bford@springfieldmontco.org

Principal Investigator: *Individual responsible for the technical completion of the proposed work.*

Name: Michael McGowan
 Title: Senior Project Manager
 Mailing Address: 535 Route 38, Suite 250, Cherry Hill, NJ 08002
 Phone Number: 856-485-8406
 FAX Number: _____
 E-Mail Address: mmcgowan@blcompanies.com
 Web URL: www.blcompanies.com

The public reporting and recordkeeping burden for this collection of information is estimated to average 30 minutes per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

1. Project Area Description and Plans for Revitalization

1.A. TARGET AREA AND BROWNFIELDS

1.a.i Background and Description of Target Area

Springfield Township is a 19,000-person suburban municipality situated just northwest of the City of Philadelphia in southeastern Pennsylvania. Oreland, the village in which the former TCCA property is located, is a census-designated place (CDP) within and composing nearly one-third of Springfield Township. The community is primarily residential, consisting of over 7,000 households, but also features numerous small businesses (i.e. local hardware stores, restaurants, etc.) that cater to the suburban lifestyle enjoyed by Springfield residents.

Springfield's picturesque existence as a quiet residential community was not always the case. Like most other communities in the northeastern U.S., Springfield Township was once a bustling center of industry due to the discovery of vast lime and ore deposits in Oreland (hence the name) and close proximity to the ports and rail junctions of the City of Philadelphia. Ore extraction and processing as well as railroad-specific industries (like that of the former TCCA property) served as the mainstays of the local economy. Mining and other industrial land uses dominated Springfield Township's economy until the later part of the 20th century, when the community as a whole transformed into a primarily residential suburb of Philadelphia.

The target area, the former TCCA site exemplifies the challenges of Springfield Township and countless other communities struggling to overcome historical land uses that are not consistent with or possess detrimental and long-lasting effects on contemporary uses. In the case of Springfield Township and Oreland in particular, the community has transformed from an area known for mining and railroad industrial activity to a quiet residential suburb. The contaminants from historical industrial activity in Oreland, especially at the former TCCA property (described in the Brownfield description section), posed such a threat to those living in the adjacent residential neighborhood that the property was subject to an EPA removal action that lasted from 2006 through 2011. The target area has since served as a blighted property consisting of five buildings in various states of deterioration. Combined with its history as a site of industrial contamination, this nearly eight acres of blight continues to depress the property values of nearby residential properties and inhibits the ability of adjacent neighborhoods to maximize their quality of life.

1.a.ii Description of the Brownfield Site

The defunct former TCCA property, located at 1725 Walnut Avenue in Springfield Township, Montgomery County, Pennsylvania, is the target area of this grant application. The site situated between a mixed industrial and residential area and is generally bounded to the west by Oreland Mill Road, to the south and east by Walnut Avenue and residential homes, and to the north by railroad tracks. The Property consists of approximately 7.89 acres. The property was purchased by Springfield Township in 2015 after a Phase I environmental assessment was performed as part of the Township's due diligence efforts prior to the agreement of sale.

From approximately 1921 until 2001, TCCA owned and operated a facility at the Property to repair or maintain railroad tank cars. Operations at the facility included the rebuilding, repair, alteration, and conversion of rail cars; major and minor fabrication and welded repairs to tanks; and

sandblasting and painting of railroad cars. TCCA's former industrial operations at the facility produced hazardous wastes and liquids containing hazardous substances that were placed in a lagoon, and later into buried tanker cars, at the Property. In addition, sandblasting grit containing lead was used and disposed of at the Property. When TCCA ceased operations in 2001, the lagoon, tanker cars, and sandblast grit were left in place on the Property. The EPA initiated a Superfund removal site evaluation at the Site in 2006 and selected to conduct a Removal Action. This action included the identification of above- and below-ground tanks; securing tank-openings and piping systems to prevent releases of hazardous substances; and sampling, characterizing, removing, and disposing off-Site liquids in the tanks. It did not, however, remediate all known contaminants on the site. Residual contaminants in soil and groundwater were left behind. BL Companies, on behalf of the Township, currently is in the process fully delineating these impacts. Once fully delineated, the residual impacts will be actively remediated, as needed, and then capped with several feet of clean fill material.

In addition to the residual surface and subsurface soil and groundwater impacts, hazardous materials remain in the buildings on the property. A Hazardous Building Materials Investigation & Waste Disposal Inventory was conducted on September 29, 2020, focusing on the remediation and demolition of the remaining on-site structures listed below:

- A two-story, slab-on-grade, Office Building, located in the south-central portion of the Site;
- A one-story, slab-on-grade, Warehouse Bldg., located in the southwestern portion of the Site;
- A one-story, slab-on-grade Small House, located in the southwestern portion of the Site;
- A one-story, slab-on-grade Boiler House, located in the northwestern portion of the Site; and
- A one-story, slab-on-grade Paint Shop Bldg., located in the northwestern portion of the Site.

The purpose of the survey was to determine the nature and estimated extent of asbestos containing materials (ACMs) present in the Site buildings prior to renovation, along with addressing the potential presence of other HBMs, including lead-based paint (LBP), polychlorinated biphenyl (PCB)-containing fluorescent light ballasts, mercury-containing fluorescent light tubes and thermostat switches, and miscellaneous wastes that may have specialized disposal requirements. It should be noted that the asbestos portion of this investigation generally followed the Occupational Safety and Health Administrations (OSHAS) regulations and the United States Environmental Protection Agency's (USEPAs) National Emission Standards for Hazardous Air Pollutants (NESHAP) protocol.

Hazardous Building Materials Investigation & Waste Disposal Inventory Results

- Approximately 100 linear feet of roof sealant and approximately 500 square feet of 9-inch by 9-inch, resilient floor tile would be classified as Category I non-friable ACMs;
- Approximately 500 square feet of joint compound; approximately 38,000 square feet of transite typewall and/or roof panels; approximately 100 linear feet of window glaze; and approximately
- 20 square feet of boiler backerboard panel would be classified as Category II non-friable ACMs.
- Large quantities of LBP in all five on-site buildings;
- PCB-containing fluorescent light ballasts in four of the five buildings;
- 432 linear feet of Mercury-containing fluorescent light tubes and four thermostat switches

To address these hazardous materials, the environmental consultants recommend that the on-site structures be abated of asbestos and lead-based paint and that the hazardous materials be removed in accordance with state and federal guidelines. Once these abatement/removal activities are completed, the buildings will be demolished.

1.B REVITALIZATION OF THE TARGET AREA

1.b.i Reuse Strategy and Alignment with Revitalization Plans

The Township has a two-pronged reuse strategy for the former TCCA site. First, the Township will continue to delineate surface and subsurface soil and groundwater contaminants through the state-funded Phase II environmental assessments currently being conducted by BL Companies. If any “hot spots” warranting active remediation are detected, such remediation will be performed. While the assessments are underway, the Township's second prong involves the abatement and demolition of the on-site structures as outlined in the attached quotes received by qualified environmental professionals (see attached). Once the subsurface delineation activities, hazardous materials abatement, and building demolition are completed, a fresh layer of clean fill material will be spread across the property, capping any residual subsurface and surface impacts.

As indicated throughout this grant application, Springfield Township intends to redevelop the former TCCA site into a public park featuring an athletic field, passive open space, and a walking trail. The initial acquisition of the site was a one of the major long-term priorities of the Township's [open space plan](#). Additionally, the creation of new parklands and more even distribution of open space was identified as a major goal in the Township's [parks and recreation master plan](#), with Oreland being of particular importance for park acquisition due to its nature as a nearly fully development area. The redevelopment of the former TCCA site would significantly add to the minimal park area situated in the Oreland section of Springfield Township. The purposed reuse of the former TCCA site as a public park with numerous recreational amenities also aligns with Pennsylvania's ["Recreation for All" Plan](#), which promotes the development and expansion of recreational opportunities for citizens of all ages.

1.b.ii Outcomes and Benefits of Reuse Strategy

Site reuse will have many benefits, but the most significant are:

1)	Cleanup and remediation of this blighted site will allow the Township and neighborhood to redevelop the property and remove a detrimental influence on nearby property values. It would also improve the quality of life for the adjacent neighborhoods. Oreland deserves additional parkland and recreational opportunities to which residents can take their children.
2)	Cleanup and remediation is necessary for the site to qualify for future grant applications specifically geared for the redevelopment of the site.
3)	Reuse of the former TCCA site will spur economic development in Oreland by making that section of the Township more appealing to residents and businesses. By removing the blighted property and reassuring neighbors that the site has been properly remediation and redeveloped for public purposes, the area will become a beacon to attract additional families and businesses to the Township.
4)	Reuse will both improve infrastructure and create a new crossroads for pedestrians and bicyclists, linking the eastern segments of Walnut Avenue to Oreland Mill Road and the future Walnut Avenue pedestrian pathway to the western segment of Walnut Avenue.

1.C STRATEGY FOR LEVERAGING RESOURCES

1.c.i Resources Needed for Site Reuse

In 2020, the Pennsylvania Department of Community and Economic Development awarded Springfield Township funding to conduct Phase II environmental assessments at the former TCCA site. Those funds were matched by the Township using local capital reserve funds.

If this application is awarded grant funding, the remediation and demolition of on-site structures will facilitate the likelihood of the Township obtaining state and county grant funding for the redevelopment of the site. The Township has been quite successful in applying for and being awarded funding in recent years:

- \$102,450 from PA DCED's Industrial Site Reuse Program (ISRP) for Phase II Assessments
- \$197,600 from Montgomery County's Comprehensive Plan Implementation Program for park redevelopment (Mermaid Park)
- \$134,000 from PA DCNR's Community Conservation Partnership Program for park improvements (Cisco Park)
- \$72,215 from Montgomery County's Community Development Block Grant for park improvements (Chiaramonte Park)

Once the phase II environmental assessments are complete, the Township intends to submit a second ISRP grant for the redevelopment of the site. Preliminary conversations with state officials seem to indicate a high likelihood of the site to continue to be awarded state grants since it is a former heavy industrial property adjacent to a residential neighborhood.

1.c.ii Use of Existing Infrastructure

Reuse at the former TCCA will use existing infrastructure including adjacent sewer, water, storm drainage, road, and dry utilities. Plans for reuse include the construction of two rain gardens and will meet the Township's MS4 standards. Walnut Avenue and Orelan Mill Road provide adjacent road access, while pedestrian and bicycle access to the former TCCA property will be provided by on-street access and the proposed Walnut Avenue Pedestrian Walkway (which will connect the TCCA site with the Township-owned Sandy Run Park).

2. Community Need and Community Engagement

2.A COMMUNITY NEED

2.a.i The Community's Need for Funding

Springfield Township has already expended \$650,000 for the acquisition and current assessment of the former TCCA site. Being a primarily residential community, the Township relies heavily on property and earned income taxes for fund operating revenues. The Township lacks a dedicated source of funding, such as a restricted Open Space Fund that could otherwise be used to finance the remediation and demolish of the on-site structures. Thus, this grant would serve as a critical source of funding for the project.

2.a.ii Threats to Sensitive Populations

1. Health or Welfare of Sensitive Populations

Orelan is the most densely populated and socio-economically challenged area in Springfield Township. The population of Orelan is primarily married couples (67%) with younger families (average household size is 2.7). The youth population in Orelan is expected to climb in upcoming years as the local growth rate (6.2%) is about 20 percent higher than the state rate (5.2%).

The cleanup and redevelopment of the former TCCA site will directly provide Oreland families that with direct access to parklands and recreational opportunities. This is crucial since the area is consists mostly of single-family residences with younger children (nearly a quarter of Oreland's population is under the age of 20).

2. Greater Than Normal Incidence of Disease and Adverse Health Conditions

For the purposes of this grant, the activities funded would directly result in the elimination of hazardous materials and waste as identified and described in previous sections. These materials pose a direct threat to any individual who might ignore the Township's warnings and come across them on site. In addition to the hazardous materials and soil and groundwater impacts, the deteriorated condition of the on-site structures pose a credible physical threat due to their structural instability.

3. Disproportionately Impacted Populations

As noted above, families and children—particularly in the Oreland neighborhood—are disproportionately impacted by the current condition of the former TCCA property and will be particularly benefited by the redevelopment. These sensitive populations are particularly impacted by the Oreland's lack of sidewalks, public greenspace, and affordable housing, and the inability to move safely and conveniently to jobs or services without an automobile. The former TCCA site reuse plan seeks to address these issues directly by: eliminating a major source of blight in the Oreland neighborhood; improving street-side infrastructure; linking Sandy Run Park with the neighborhoods located east of the Oreland Mill Road/Walnut Avenue intersection; and providing new public greenspace for the residents of Oreland. The redevelopment of the former TCCA site will also directly address environmental justice issues that disproportionately impact sensitive populations in Oreland.

2.b Community Engagement

2.b.i Project Involvement & 2.b.ii Project Roles - The table below shows anticipated project partners and their roles. We also anticipate partnership with local recreational entities to enable reuse and programming of the former TCCA site:

PARTNER ENTITY	ROLE
<i>BL Companies</i>	On-site project manager and environmental consultant
<i>Post & Schell, P.C.</i>	Environmental Counsel; providing legal assistance
<i>Carroll Engineering</i>	Responsible for providing engineering services for the reuse of the site
<i>PA Dept. of Environmental Protection</i>	Oversees clean-up of TCCA site under Act 2 program
<i>PA Dept. of Community and Economic Development</i>	Administrator of the Industrial Site Reuse Program; potential source of environmental site assessment and redevelopment funding
<i>PA Dept. of Conservation and Natural Resources</i>	Lead state agency responsible for promoting recreational and green spaces; potential source of redevelopment funding.
<i>Springfield Soccer Club</i>	Potential active uses of the proposed multipurpose fields featured on the redevelopment plans for the former TCCA site.
<i>Springfield Lacrosse</i>	Potential active uses of the proposed multipurpose fields featured on the redevelopment plans for the former TCCA site.
<i>Oreland Lions Club</i>	potential partner for volunteers and fundraising
<i>Springfield Rotary Club</i>	potential partner for volunteers and fundraising

2.b.iii Incorporating Community Input

The local community, project partners, and residents/groups impacted by the project have already been heavily involved in cleanup and reuse planning. Most recently, on October 19, 2020, the Township hosted a virtual public meeting to share and solicit feedback on the draft Cleanup Grant application to EPA and the Analysis of Brownfields Cleanup Alternatives.

Moving forward with cleanup planning, implementation, and master plan development the Township will continue robust community engagement, including: (1) stakeholder and small group outreach; (2) at least two public meetings or open houses during the cleanup process and more during reuse planning (translators and information in Hmong and Spanish will be utilized as appropriate); (3) on-site engagement, such as displays; (4) web-based communications, including a web page dedicated to this project with a feedback mechanism; and (5) media outreach.

3 Task Descriptions, Cost Estimates, and Measuring Progress

3.a Proposed Cleanup Plan

This grant application is intended to fund the acquisition of environmental liability insurance, the full remediation and demolition of the onsite structures, and the remediation and capping of residual soil and groundwater impacts. Investigation activities are ongoing and are being largely funded by a Pennsylvania Industrial Sites Reuse Program Grant. The remediation activities, to which this application applies, will consist of the following tasks:

TASK 1: Purchasing Extending Environmental Liability Insurance **[Post Schell Lead: A. Mapes] [Nov 2020]**

- Purchase environmental liability insurance to cover risks associated with known and unknown residual contaminants and hazardous materials at the site. First payment will be made before grant is awarded. Remaining payments are due annually in November 2021, 2022, and 2023.

TASK 2: Abatement and Removal of Hazardous Materials in the Onsite Structures **[BL Companies lead: M. McGowan] [June 2021]**

- This task can be broken down into two (2) action items:
 - Item 1: The removal and disposal of the following asbestos containing materials from:
 - 500 SF of 9x9 ACM Floor tiles only from Office Bldg.
 - 500 SF of Friable ACM Joint compound from Small House
 - 28,000 SF of Transited roof panels from Warehouse
 - 100 LF of window glazing from Boiler
 - 20 SF of white backer board panels 3 layers from Boiler House
 - 10,000 SF of Transited roof panels from Paint Shop
 - Item 2: The removal and disposal of the following materials from:
 - ~ 90 PCB containing ballasts
 - ~ 90 Mercury containing lamps
 - 4 Mercury containing thermostats
 - Packaging, recycling and disposal of all items listed above

TASK 3: Demolition of the Onsite Structures **[BL Companies lead: M. McGowan] [Aug 2021]**

- Demolition of the five on-site structures.

TASK 4: Additional Soil Remediation (if applicable) and Capping
[BL Companies lead: M. McGowan] [Nov 2021]

- Although not anticipated, active soil and groundwater remediation will be performed if required based on the results of the ongoing investigations. In addition, regardless of whether any active remediation is performed, the site will be capped with several feet of clean fill material. The clean fill material is stockpiled at the site and will be spread across the site at the appropriate time during the remediation phase of the cleanup. Finally, BL Companies will prepare reports documenting the remediation plans and remediation results, BL Companies and environmental counsel will assist with drafting and recording an environmental covenant for the site.

3.b Description of Tasks/Activities and Outputs

3.b.i Project Implementation See proposed clean-up plan for details

3.b.ii Anticipated Project Schedule

See proposed clean-up plan for estimated completion date for each task. Please note that the Township fully expected to complete all work outlined in this grant application within a two (2) year window.

3.b.iii Task/Activity Lead See proposed clean-up plan for details on activity leads.

3.b.iv Outputs See proposed clean-up plan for outputs for each task.

3.c Cost Estimates

Budget Categories		Project Tasks (\$)				
		Task 1	Task 2	Task 3	Task 4	Total
Direct Costs	Personnel					
	Fringe Benefits					
	Travel ¹					
	Equipment ²					
	Supplies					
	Contractual	\$36,525	\$238,000	\$141,250	TBD	\$415,775
	Other					
Total Direct Costs ³						
Indirect Costs ³						
Total Federal Funding (Not to exceed \$500,000)		\$29,220	\$190,400	\$113,000	TBD	\$332,620
Cost Share (20% of requested federal funds) ⁴		\$7,305	\$47,600	\$28,250	TBD	\$83,155
Total Budget (Total Direct Costs + Indirect Costs + Cost Share)		\$36,525	\$238,000	\$141,250	TBD	\$415,775

All figures provided in the table above are based on actual estimates provided by service providers/contractors. Actual estimates are provided as an attachment to this application.

Task 1: Purchasing Extending Environmental Liability Insurance (TOTAL COST: \$36,525)

The budget includes the cost of environmental liability insurance in the amount of \$36,525 to cover the Township during the three year period of the grant. This figure represents 60% of the premium that the Township will be paying for a 5-year Pollution Legal Liability (PLL) insurance policy that goes into effect on October 30, 2020. Coverage includes, among other things, coverage for onsite clean-up costs, bodily injury claims, property damage and natural resource damages claims, location liability, transportation liability, and emergency expenses.

The limits for this coverage generally are \$5,000,000 for each pollution event and \$10,000,000 aggregated policy limit. Other limits and sub-limits apply to certain types of claims and cost items, such as business interruption coverage and crises management expenses.

Task 2: Abatement and Removal of Hazardous Materials (TOTAL COST: \$238,000)

The budget for Task 2 is based on the findings of the Hazardous Building Materials & Waste Disposal Inventory conducted by BL Companies in Sept. 2020. This estimate includes \$238,000 for a licensed abatement professional to legally abate and remove hazardous building materials from the site. Costs also include proper disposal at a facility licensed to accept hazardous building materials. This project has been priced to commence as Non-Union, Prevailing Wage Standard Hours/Shift Work, Monday to Friday from 7:00am to 3:30pm.

Task 3: Demolition of the Onsite Structures (TOTAL COST: \$141,250)

The budget for Task 3 is based on an estimate received in October 2020 for the demolition of the five existing on-site structure at the property in the amount of \$141,250. In addition to the actual demolition, this estimate includes notification of demolition to the PA One Call system and appropriate environmental agencies (PA DEP & US EPA), removing vegetation surrounding the buildings, and fencing off the demo site.

Task 4: Additional Soil Remediation (if applicable) and Capping (TBD)

Although not anticipated or included as an active component of this grant application, additional soil and groundwater remediation will be performed if required based on the results of the phase II environmental assessment currently being conducted. In addition, regardless of whether any active remediation is performed, the site will be capped with several feet of clean fill material. The clean fill material is stockpiled at the site and will be spread across the site at the appropriate time during the remediation phase of the cleanup. Finally, BL Companies will prepare reports documenting the remediation plans and remediation results, BL Companies and environmental counsel will assist with drafting and recording an environmental covenant for the site.

3.d Measuring Environmental Results

The Township will track, measure, and report project performance through its quarterly reports, the ACRES database, and the project website. For each task, Project Outputs, Project Outcomes, and Tracking Methods are described below.

Task 1: Purchasing Extending Environmental Liability Insurance

OUTPUTS: purchasing of environmental liability insurance to cover risks associated with residual hazardous materials and work to be performed in subsequent tasks

OUTCOMES: mitigate liability and risk exposure to the township

TRACKING METHODS: retainage of an executed agreement of insurance coverage

Task 2: Abatement and Removal of Hazardous Materials in the Onsite Structures

OUTPUTS: clearance of hazardous building materials and proper disposal of said materials for five structures

OUTCOMES: Removal of obstacles to demolition of blighted structures, reduction of environmental and public health risk, preparation for eventual redevelopment of property

TRACKING METHODS: Set remediation schedule, biweekly updates on remediation progress; confirmation of proper material disposal

Task 3: Demolition of the Onsite Structures

OUTPUTS: demolition of the five onsite structures

OUTCOMES: Removal of blight, reduction of environmental and public health risk, preparation for eventual redevelopment of property

TRACKING METHODS: Set demolition schedule, biweekly updates on demolition progress

Task 4: Additional Soil Remediation (if applicable) and Capping

OUTPUTS & TRACKING METHODS: TBD

OUTCOMES: Reduction of environmental and public health risk, preparation for eventual site redevelopment.

4. Programmatic Capability and Past Performance

4.a Programmatic Capability

4.a.i Organizational Structure & 4.a.ii Description of Key Staff

Springfield Townships organizational structure is as follows: the Township Manager is in direct charge of all municipal offices including the Planning & Zoning Department, Finance Office, Police and Public Works Departments, and the Free Library of Springfield Township (an operating department of Springfield Township). As such, the Township Manager will be directly responsible for overseeing this grant. A description of the grant roles and experience of each staff involved is included below:

Project Management: Mr. Brandon Ford, Springfield Township Assistant to the Manager, will serve as the project director for this grant. Mr. Ford has 5 years of experience working in grants administration for the Municipality of Norristown and now for Springfield Township. Mr. Ford has administered numerous state and county grants simultaneously will work being on time and mostly under budget.

To provide Programmatic Support of the grant, the Township has retained the services of BL Companies to facilitate the on-site project management and conduct the Phase II environmental assessments:

Mr. Michael McGowan of BL Companies serves as the Senior Project Manager for the TCCA Site and is an 18-year veteran in the field of environmental engineering. As a Senior Project Manager, he have lead multi-disciplinary project teams to achieve remediation project objectives, including supervision of scientists, engineers, sub-consultants, laboratories, and remedial contractors. He specializes in risk management for contaminated sites, remedial investigation, remedial program design, hazardous waste and remedial implementation. He has also collaborated with clients to develop remedial strategies, provide progress updates, and prepare proposals, budgets, and financial forecasts; and, also provided technical review of project plans, design reports, engineering specifications, bidding documents, contractor agreements, and construction reports/documentation.

Grant Support: Springfield Township has retained Mr. Aaron Mapes of Post & Schell, P.C. to assist with the legal aspect of the former TCCA site. Mr. Mapes is a Principal in the Firm's Environmental Practice Group, and counsels clients on a wide variety of environmental matters, including environmental diligence for real estate transactions and energy infrastructure projects, brownfields redevelopment, compliance with environmental laws, environmental permitting, and litigation of complex environmental lawsuits and administrative appeals. Mr. Mapes clients include real estate private equity funds, local municipalities, and companies in the energy distribution and industrial sectors.

Procurement: In the case where additional expertise is required (i.e. environmental contracting), the Township utilizes a competitive procurement process for obtaining this expertise. This will consist of setting up a proposal review committee, receiving proposals from multiple firms, evaluating the firms based on established criteria, and awarding the contract to the firm that best meets those criteria.

4.a.iii Acquiring Additional Resources

The Township will contract for any additionally-needed services or expertise utilizing its own procurement policy: the Townships policy is compliant with, but stricter than, federal requirements. The Township keeps a meticulous procurement record for all brownfields-related acquisitions documenting outreach, MBE/WBE good faith efforts, cost/price analysis, rationale for decision, etc. The Township intends to procure and contract for services pertaining to the remediation and demolition of on-site structures as outlined in this grant. The Township will not work with sub-recipients under this grant.

4.b past Performance and Accomplishments

4.b.i Currently Has or Previously Received an EPA Brownfields Grant

N/A. The Township has never received an EPA Brownfields Grant

4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

1. Purpose and Accomplishments

To date, the Township has hired a Qualified Environmental Professional (QEP), BL Companies, to conduct the Phase II environmental assessments and have retained an Environmental Counsel to guide the Township through the PA DEP Voluntary Cleanup Program and assist with minimizing environmental liabilities and risk.

A work plan for the Phase II assessment, which also documented the hazardous material abatement, building demolition, and capping work subject to this grant application, was submitted and approved by both the Pennsylvania Department of Environmental Protection as well as the Pennsylvania Department of Community and Economic Development (DCED). The Phase II Assessments have begun, with soil samples having been collected and groundwater monitoring wells installed on site. A Hazardous building materials and waste disposal investor was also conducted as a pre-demolition action item to identify all hazardous materials to be remediated before demolition. These assessment activities are being funded in part by a state grant under DCED's Industrial Site Reuse Program (ISRP) with the matching funds being drawn from the Township's capital reserve fund.

Community outreach has also taken place, with adjacent neighbors along with others in the community convening in October 2020 to learn more about activity at the site and the Township's intent to apply for the US EPA Brownfields Cleanup Grant Program.

2. Compliance with Grant Requirements

Springfield Township has not received any federal assistance agreements in prior years. The Township has four open grants, three with Montgomery County and one with the Pennsylvania Department of Community and Economic Development. The County grants were awarded for FY18 & 19 with an expected completion date of FY 20 and the Township has submitted timely quarterly reports to the County as per the cooperative grant agreement. The DCED grant was awarded in FY20 specifically to conduct the Phase II environmental assessment at the former TCCA Site. Work promptly began on the assessment once the Governor's pandemic-induced work restriction was lifted. The expected end date of the grant is FY21. The Township's environmental consultants are submitting timely reports on the progress of the work.

4.b.iii Never Received Any Type of Federal or Non-Federal Assistance Agreements

Springfield Township has never received any type of federal or non-federal assistance agreement.

Threshold Criteria for Cleanup Grants

1 Applicant Eligibility

Springfield Township is a municipality of the Commonwealth of Pennsylvania and therefore eligible for funding.

2 Previously Awarded Cleanup Grants

Springfield Township and the target area (the former TCCA site) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3 Site Ownership

As of October 30, 2015, Springfield Township is the sole owner of the target area (the former TCCA property).

4 Basic Site Information

- (a) Site name: Former Tank Car Corporation of America (TCCA) site
- (b) Address: 1725 Walnut Avenue, Orelan, PA 19075
- (c) Current Owner: Springfield Township is the current owner

5 Status and History of Contamination at the Site

The target area, the former TCCA site, was contaminated by hazardous substances due to its prior use as a railroad tank car rehabilitation facility under the ownership of the TCCA (operating from 1921-2001). The operations at the Site included the removal of various residual materials from tank cars as well as sandblasting/painting/repairing tank cars. At least two surface water impoundments/lagoons reportedly were used at the Site to store various potentially hazardous materials that were removed from the tank cars. In addition, at least four buried railroad tank cars and other aboveground tank cars and tanks reportedly were used to store hazardous materials.

Between 2007 and 2011, the United States Environmental Protection Agency (USEPA) implemented site characterization and remedial activities at the Site. The characterization activities included the collection and analysis of numerous on-Site surface and subsurface soil samples; the collection and analysis of surface soil samples from adjacent off-site residential properties; the collection and analysis of surface water samples from the property directly north of the Site; and the installation of three new monitoring wells and the sampling of these new wells and three existing monitoring wells. The results of the site characterization activities revealed various compounds, mainly volatile organic compounds (VOCs), polynuclear aromatic hydrocarbon (PAH) compounds, and metals in surface and subsurface soils and ground water at the Site at concentrations exceeding Medium Specific Concentration (MSC) cleanup standards developed pursuant to Pennsylvania's Land Recycling and Environmental Remediation Standards Act (Act 2). PAH and metal exceedances of Act 2 MSCs also appear to have been identified in surface soil samples collected on adjacent off-site residential properties.

In response to these investigation activities, the USEPA performed significant remedial activities at the Site, including such actions as:

- Removal and off-Site disposal of liquids from piping systems, the removal of tanks to facilitate the removal of contaminated soils, and removal and off-Site disposal of visually contaminated soils.
- Implementation of temporary erosion and sedimentation controls to control storm water through the Site and to minimize migration from the Property.
- Removal, and consolidation onto the Property, of sandblast grit containing hazardous substances from the residential properties adjacent to the Property as well as on the Property itself.
- Removal, and temporarily storage of, shallow underground water to facilitate removal of the black tarry material from the lagoon area.
- Removal and off-Site disposal of the black tarry material and affected soils from the lagoon area.
- Construction of a cover atop the consolidated sandblast materials.
- Installation of permanent erosion and sedimentation controls to minimize future migration of hazardous substances from the Site.
- Placement of signage identifying the location and characteristics of hazardous substances remaining at the Site.
- Demolition of the paint shed on the northern boundary of the Property and off-Site disposal of the debris.
- Demolition of the sandblast shed on the Property and off-Site disposal of the debris.
- Exterior cleaning of nearby structures and equipment on neighboring properties and installation of vegetation around the Property perimeter.

Since there are still environmental impacts at the site beyond what was remediated by USEPA, including impacted soil and ground water and hazardous building materials, additional remediation activities are required before the property can be converted to a public recreational amenity.

6 Brownfields Site Definition

Springfield Township affirms that the target area (the former TCCA site) is (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and/or (c) not subject to the jurisdiction, custody, or control of the United States government.

7 Environmental Assessment Required for Cleanup Applications

BL Companies, on behalf of the Township, currently is in the process fully delineating the environmental impacts that require remediation. One component of this work is delineating the residual surface and subsurface soil and groundwater impact at the site. This work is ongoing. Once fully delineated, the residual surface and subsurface impacts will be capped with several feet of clean fill material.

In addition to the residual soil and groundwater impacts, hazardous materials remain in the buildings on the property. A Hazardous Building Materials Investigation & Waste Disposal Inventory was conducted on September 29, 2020, focusing on the remediation and demolition of the remaining on-site structures listed below:

- A two-story, slab-on-grade, Office Building, located in the south-central portion of the Site;
- A one-story, slab-on-grade, Warehouse Building, located in the southwestern portion of the Site;
- A one-story, slab-on-grade Small House, located in the southwestern portion of the Site;

- A one-story, slab-on-grade Boiler House, located in the northwestern portion of the Site; and
- A one-story, slab-on-grade Paint Shop Building, located in the northwestern portion of the Site.

The purpose of the survey was to determine the nature and estimated extent of asbestos containing materials (ACMs) present in the Site buildings prior to renovation, along with addressing the potential presence of other HBMs, including lead-based paint (LBP), polychlorinated biphenyl (PCB)-containing fluorescent light ballasts, mercury-containing fluorescent light tubes and thermostat switches, and miscellaneous wastes that may have specialized disposal requirements. It should be noted that the asbestos portion of this investigation generally followed the Occupational Safety and Health Administrations (OSHA's) regulations and the United States Environmental Protection Agency's (USEPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP) protocol.

Hazardous Building Materials Investigation & Waste Disposal Inventory Results

- Approximately 100 linear feet of roof sealant and approximately 500 square feet of 9-inch by 9-inch, resilient floor tile would be classified as Category I non-friable ACMs;
- Approximately 500 square feet of joint compound; approximately 38,000 square feet of transite typewall and/or roof panels; approximately 100 linear feet of window glaze; and approximately
- 20 square feet of boiler backerboard panel would be classified as Category II non-friable ACMs.
- Large quantities of LBP in all five on-site buildings;
- PCB-containing fluorescent light ballasts in four of the five buildings;
- 432 linear feet of Mercury-containing fluorescent light tubes and four thermostat switches

To address these hazardous materials, the environmental consultants recommend that the on-site structures be abated of asbestos and lead-based paint and that the hazardous materials be removed in accordance with state and federal guidelines. Once these abatement/removal activities are completed, the buildings will be demolished.

8 Enforcement or Other Actions

The Township is unaware of any ongoing or anticipated environmental enforcement or other actions related to the site. The Township has been in close coordination with state agencies and DEP regarding the site, which would lead and be aware of such enforcement actions. The Township is aware, however, that the EPA previously initiated a cost recovery action against TCCA to recover the costs incurred by EPA in connection with its Removal Action. The Township understands that this cost recovery action has been resolved, and that the primary relief to EPA was taking assignment of one or more insurance policies owned by TCCA.

9 Sites Requiring a Property-Specific Determination Not applicable.

10 Threshold Criteria Related to CERCLA/Petroleum Liability

10.a Property Ownership Eligibility - Hazardous Substance Sites

10.a.i Exemptions to CERCLA Liability

- 1. Indian Tribes - Not applicable.**
- 2. Alaska Native Village Corporations and Alaska Native Regional Corporations - Not applicable.**

3. Property Acquired Under Certain Circumstances by Units of State and Local Government

In 2015, Springfield Township acquired the targeted area (the former TCCA property) by condemnation through a filing of a Declaration of Taking with the Montgomery County Court of Common Pleas pursuant to Chapter 3, Section 302 of the Pennsylvania Eminent Domain Code, 26 Pa. C.S. 302 on October 30, 2015. As indicated in the attached County record for the property, the date of sale and subsequent transition of ownership to Springfield Township occurred on October 30, 2015.

A letter dated January 12, 2016 from the EPA Region III Office confirms that that the disposal of hazardous substances occurred at the site prior to the Township's acquisition of the property and that the Township did not cause or contribute to any release of hazardous substances at the site. The Township can also confirm that the Township has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site since acquiring ownership. The only work undertaken by the Township at the property has been the Phase I and now Phase II environment assessments and the recently completed Hazardous substance inventory referenced in previous sections of this application.

10.a.ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

1 Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Not applicable. As noted, the property was acquired on October 30, 2015.

10.a.iii Landowner Protections from CERCLA Liability

1 Bona Fide Prospective Purchaser Liability Protection

1.a Information on the Property Acquisition

In 2015, Springfield Township acquired sole ownership of the targeted area (the former TCCA property) from the Tank Car Corporation of America. The acquisition occurred by condemnation through a filing of a Declaration of Taking with the Montgomery County Court of Common Pleas pursuant to Chapter 3, Section 302 of the Pennsylvania Eminent Domain Code, 26 Pa. C.S. 302 on October 30, 2015. As indicated in the attached County record for the property, the date of sale and subsequent transition of ownership to Springfield Township occurred on October 30, 2015.

The elected officials and appointed officers of Springfield Township have not had nor do they currently have any familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators associated with the Tank Car Corporation of America.

1.b Pre-Purchase Inquiry

Prior to the purchase of the property by Springfield Township, a Phase I Environmental Assessment (ESA) was conducted by Penn Environmental & Remediation, Inc. The Phase I ESA was conducted in general compliance with the ASTM E1527-13 standard. It was initiated on May

6, 2015, which was within 180 days of the purchase date of October 30, 2015. As part of its Phase I ESA, Penn E&R undertook the following actions, among others:

- Penn E&R conducted a file review at the Pennsylvania Department of Environmental Protection (PADEP) on May 21, 2015 to determine if the Department maintained pertinent files or documents associated with the Site.
- Penn E&R reviewed Site-specific files maintained on the United States Environmental Protection Agency (USEPA) website (<http://www.epa.gov/arweb>).
- Penn E&R contacted Springfield Township and Montgomery County to determine if these entities maintained any environmental reports, records of violations, or other information regarding environmental conditions at the Site.
- Penn E&R obtained and reviewed a commercial database report of federal and state environmental records to identify the location of properties within a 1-mile radius that might pose an unacceptable environmental risk to the Site.
- Penn E&R obtained and reviewed an environmental lien search report and historical aerial photographs and topographic maps to document past uses of the Site and surrounding areas.
- Penn E&R conducted a Site reconnaissance and interviewed knowledgeable personnel.

1.c Timing and/or Contribution Toward Hazardous Substances Disposal

A letter dated January 12, 2016 from the EPA Region III Office confirms that that the disposal of hazardous substances occurred at the site prior to the Township's acquisition of the property and that the Township did not cause or contribute to any release of hazardous substances at the site.

The Township can also confirm that the Township has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site since acquiring ownership. The only work undertaken by the Township at the property has been the Phase I and now Phase II environment assessments and the recently completed Hazardous substance inventory referenced in previous sections of this application.

1.d Post-Acquisition Uses

Since acquiring ownership in late 2015, the only use of the property has occurred through a leasing of the 5,000 square-foot warehouse to a welding company owned and operated by Bruce Allen (612 Edge Hill Road, Glenside, PA 19038). The lease between the Township and Mr. Allen is dated July 1, 2016 and has been continued on a month to month basis to the present date. As per the terms of the agreement, the tenant (Mr. Allen) is responsible for gas and electric utilities in addition to a base rate. The agreement also stipulates that the Landlord (the Township) shall not make any repairs, replacements, or renewals of all structure aspect of the warehouse in which the tenant is located. Mr. Allen has been the only tenant since acquisition of the site and is aware of the Township's intention to remediate and eventually redevelop the site.

1.e Continuing Obligations

Since acquiring ownership in 2015, the Township has actively restricted access to the site with the only exemption being the tenant of the one warehouse building. This was done in order to prevent

or limit exposure to any previously released hazardous substance and prevent any threatened future release. Fencing and signage surround the perimeter of the property and the Township has maintained its adherence to all federal and state rules and regulations in accordance to the guidelines shared with the Township following the EPA activity between 2006 and 2011.

The Township also continues to investigate and remediate the site under Pennsylvania's Act 2 program. The Township submitted to PA DEP a Notice of Intent to remediate and is currently conducting additional Phase II environmental assessment (which include additional soil and groundwater sampling as well as a hazardous substance inventory of the on-site structures).

Shortly after the Township acquired the property, USEPA issued a Superfund comfort/status letter. The letter stated that US EPA believes the following would be appropriate "reasonable steps" to stop continuing releases, prevent threatened future releases, and prevent or limit human, environmental, or natural resources exposure to earlier releases as required by CERCLA Section 101(40)(D).

1. Maintain the integrity of the EPA-constructed cover on the Property to prevent the release of, or exposure to, the contaminated soils and sands beneath the cover;
2. Do not decrease the thickness of the cover (it may, however, be increased);
3. Paving the capped area would be acceptable to the EPA as it would provide an additional layer of protection, provided the paving operation does not impact the cover's integrity;
4. Maintenance should be performed on the covered area commensurate with use of the area, weather conditions, etc. For example, if rain causes some of the cover to erode, additional material should be put in place and measures taken to prevent reoccurrence;
5. Before any work is undertaken within the covered area that may impact the integrity of the cover, notify the EPA and PADEP in writing of the work to be undertaken and the steps to be used in ensuring that there will be no releases and that human, environmental, and natural resource exposure to contaminants beneath the cover will be avoided;
6. Maintain the existing signage notifying users of the Property that digging in the covered area is prohibited.

The Township has taken/complied with each of these steps since acquiring the property. It also has assisted, cooperated with, and provided access to those performing the cleanup; complied with all information requests and administrative subpoenas that have been issued in connection with the property; and provided all legally required notices.

a.iii.2 Non-Publicly Owned Sites Acquired Prior to January 11, 2002

Springfield Township is a municipal entity of the Commonwealth of Pennsylvania and this section is not applicable.

10.b Property Ownership Eligibility - Petroleum Sites

10.b.i Information Required for a Petroleum Site Eligibility Determination

b.i.1 Current and Immediate Past Owners	Does Not Apply.
b.i.2 Acquisition of Site	Does Not Apply.
b.i.3 No Responsible Party for the Site	Does Not Apply.
b.i.4 Cleaned Up by a Person Not Potentially Liable	Does Not Apply.
b.i.5 Judgments, Orders, or Third Party Suits	Does Not Apply.
i.6 Subject to RCRA	Does Not Apply.
b.i.7 Financial Viability of Responsible Parties	Does Not Apply.

11 Cleanup Authority and Oversight Structure

11.a Cleanup Oversight

Cleanup Oversight: The Site is entered into the Pennsylvania DEP's Voluntary Response Action Program (Act 2). Under the Voluntary Response Action Program, the Pennsylvania DEP provides technical review and comment on all plans, reports, and activities pertaining to cleanup of the Site. The Town has also hired qualified environmental professionals (QEP), BL Companies for project management and assessment activity as well as Post & Schell, P.C. as environmental counsel for the Township. The consultants will obtain and evaluate remediation contractor bids, coordinate and oversee remediation activities, and document the remedial actions pertinent to the Pennsylvania DEP Voluntary Response Action Program. The Township Manager will oversee the activities of the consultants and will report regularly to Springfield's elected officials and the public on their conduct.

11.b Access to Adjacent Properties

Not applicable. No Cleanup (or associated confirmation sampling or monitoring activities) to be performed using US EPA funds will require access to neighboring properties.

12 Community Notification

12.a Draft Analysis of Brownfields Cleanup Alternatives

Draft Analysis of Brownfields Cleanup Alternatives is attached.

12.b Community Notification Ad

The residents of Springfield were notified of the Township intent to apply for the EPA Brownfields Grant program as well as instructions on how to comment on the draft application, its location, and the time, date, and location of the public meeting pertaining to this application through the Township website (www.springfieldmontco.org) as well as a personalized letter hand delivered to nearly two dozen properties surrounds the former TCCA site. Copies of the website notice and personalized letter are attached.

12.c Public Meeting

A public meeting pertaining to this grant application was held virtually via Zoom due to state restrictions on public gatherings. Approximately twenty residents attended in addition to Township representatives and elected officials. Meeting notes and sign-in sheets are attached to this grant application. Public comments and applicant responses to those comments are not included as no public comments were received outside of the public meeting.

12.d Submission of Community Notification Documents

The residents of Springfield were notified of the Township intent to apply for the EPA Brownfields Grant program as well as instructions on how to comment on the draft application, its location, and the time, date, and location of the public meeting pertaining to this application through the

Township website (www.springfieldmontco.org) as well as a personalized letter hand delivered to nearly two dozen properties surrounds the former TCCA site.

Copies of the draft ABCA, website notice and personalized letter informing residents in adherence to the guidelines of this application, meeting notes, and meeting sign-in sheet are attached. Public comments and applicant responses to those comments are not included as no public comments were received outside of the public meeting.

B.13 Statutory Cost Share

13.a Meet Required Cost Share

Springfield Township is committed to providing the local match share of \$88,009 through the use of the Township's healthy capital reserve fund. The Township's Board of Commissioners affirmed their commitment to using existing capital reserve funds for this grant's local match with the adoption of Resolution 1509 on October 14, 2020.

<https://www.springfieldmontco.org/media/2793/boc-october-business.pdf>

III.B.13.b Hardship Waiver

Not applicable

DRAFT Analysis of Brownfields Cleanup Alternatives

Former Tank Car of America (TCCA) Site
1725 Walnut Avenue
Oreland, PA 19075

Prepared by:

Springfield Township
Montgomery County, Pennsylvania

October 2020

In Reference to:

Springfield Twp. Grant Application
EPA Brownfield Clean-up Grant 2020

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1. INTRODUCTION AND BACKGROUND

1.1 SITE LOCATION

The former Tank Car Corporation of America site is located at 1725 Walnut Avenue in Oreland, Pennsylvania, a census-designated place (CDP) within and composing nearly one-third of Springfield Township, Montgomery County. The former TCCA site is situated at the intersection of Walnut Avenue and Oreland Mill Road, and is bounded to the East and South by residential neighborhoods, to the West by a light industrial property, and to the North by commuter railroad tracks owned and operated by the Southeastern Pennsylvania Transportation Authority (SEPTA).

There have been no rail car repair/refurbishment operations at the site since 2001. In October 2015, Springfield Township acquired the former TCCA property.

This Analysis of Brownfields Cleanup Alternatives (ABCA) documents concerns the entirety of the former TCCA site and has been prepared to support cleanup that will occur at this site should funding be awarded through the FY21 EPA Brownfields Cleanup Grant.

1.2 PREVIOUS SITE USES AND PREVIOUS CLEANUP AND REMEDIATION

From approximately 1921 until 2001, TCCA owned and operated a facility at the Property to repair or maintain railroad tank cars. Operations at the facility included the rebuilding, repair, alteration, and conversion of rail cars; major and minor fabrication and welded repairs to tanks; and sandblasting and painting of railroad cars. TCCA's former industrial operations at the facility produced hazardous wastes and liquids containing hazardous substances that were placed in a lagoon, and later into buried tanker cars, at the Property. In addition, sandblasting grit containing lead was used and disposed of at the Property.

Between 2007 and 2011, the United States Environmental Protection Agency (USEPA) implemented site characterization and remedial activities at the Site. The characterization activities included the collection and analysis of numerous on-Site surface and subsurface soil samples; the collection and analysis of surface soil samples from adjacent off-site residential properties; the collection and analysis of surface water samples from the property directly north of the Site; and the installation of three new monitoring wells and the sampling of these new wells and three existing monitoring wells. The results of the site characterization activities revealed various compounds, mainly volatile organic compounds (VOCs), polynuclear aromatic hydrocarbon (PAH) compounds, and metals in surface and subsurface soils and ground water at the Site at concentrations exceeding Medium Specific Concentration (MSC) cleanup standards developed pursuant to Pennsylvania's Land Recycling and Environmental Remediation Standards Act (Act 2). PAH and metal exceedances of Act 2 MSCs also appear to have been identified in surface soil samples collected on adjacent off-site residential properties. In response to these results, the USEPA performed significant remedial activities at the Site, which included the removal of hazardous materials, above and underground tanks/tank cars, and visually

impacted soils from the Site. The USEPA also excavated the lagoons and disposed of off-site black tarry material identified in the lagoons, backfilled the lagoons with sandblasting grit, consolidated the sandblasting grit on the property, and capped the consolidated sandblasting grit with clay and modified stone. Although it is not clear, USEPA may have removed sandblasting grit from adjacent residential properties to the Site and consolidated/capped it with the on-Site sandblasting grit.

1.3 SITE ASSESSMENT FINDINGS

Previous environmental assessment activities at the Site include the following:

- May 2006, Groundwater & Soil Sampling, Penn E&R, Inc.
- Feb. 2007, Removal Response Action Plan, Environmental Maintenance Co., Inc.
- April 2009, Public Health Evaluation, US EPA - Agency for Toxic Substances and Disease Registry (ATSDR)
- Nov, 2008-Oct. 2009, Removal Site Evaluation, US EPA
- May-July 2015, Phase I Environmental Site Assessment (ESA), Penn E&R, Inc.
- Sept. 2017 – Soil Sampling – BL Companies, Inc.
- Sept.-Ongoing, 2020, Phase II ESA, BL Companies, Inc.
- Sept. 2020, Hazardous Building Materials Investigation & Waste Disposal Inventory, BL Companies, Inc.

Many of these site assessment results are summarized in the Revised Work Plan for Site Assessment Activities, dated October 25, 2018, revised March 15, 2019, August 14, 2019, and September 20, 2019, prepared by BL Companies, which has been provided to EPA along with the Township's application materials.

The following summarizes key findings identified for the Site as a result of the site assessment activities above. Please note that many of these findings subsequently were addressed or remediated through EPA's Removal Action, or are now being further investigation by BL Companies:

- A review of the soil sample results revealed that SVOC exceedances were identified in all soil samples, VOC and metal exceedances were identified in several samples. A review of the water sample results revealed that benzene and numerous SVOCs were detected at concentrations exceeding their Act 2 RUA MSCs.
- The RAP indicated that there were three USTs and seven ASTs located on the property. The material identified in the USTs was a heavy petroleum mixture indicative of a No. 4-6 bunker type oil. With the exception of two tanks, AST-5 (water/ammonia solution) and AST-7 (heating oil), the liquids stored in the ASTs contained VOCs, SVOCs, and metals.
- Subsurface soils are contaminated with volatile and semi-volatile organics. These chemicals present a potential for public health concern if direct contact occurs,

vapor intrusion into nearby dwellings occurs, or contaminants migrate to ground water aquifers accessed for drinking water. None of the contaminants analyzed exceed adult Comparison Values (CVs) for noncancerous health effects, except lead. The ability of PAHs to induce short-term health effects in humans is not clear. Therefore, ATSDR concluded that direct contact with PAR-contaminated soils may result in adverse dermal effects (i.e. rash, irritation, inflammation). The arithmetic mean and maximum lead concentrations identified in surface soils at the Site were 1,145 parts per million (ppm) and 1,980 ppm, respectively. Acute exposure to lead at these concentrations was not expected to result in adverse health effects, but chronic exposures to these lead concentrations may cause adverse health effects.

- As a result of these findings, ATSDR recommended the following actions: Access to the Site should be restricted to reduce potential exposures to trespassers; On-site workers should be informed of the contamination identified at the property and the potential for unhealthy exposures to surface and subsurface soil contaminants; The sources of waste at the Site, including leaking underground tanks and other hazardous waste containers, should be properly addressed to eliminate future exposures; Nearby residents should be informed about conditions at the Site; Elevated VOC concentrations in subsurface soil indicate the potential for vapor intrusion; Future users of the Site, including developers, planners, and future residents, should be made aware
- The removal site evaluation indicated that the Site is covered with sand blasting grit contaminated with elevated inorganic contaminants (i.e. lead) and concentrations of organic contaminants (predominantly PARs such as benzene (a) pyrene). It was noted that exposure to these contaminants may occur via direct contact and incidental inhalation or ingestion pathways. The contaminants in the sandblasting grit could also migrate to surface water as evidenced by contaminants in the drainage pathway, shallow ground water, and surface water. Further, the contaminants in the sandblasting grit could also migrate to adjacent properties through air migration.
- The removal site evaluation also indicated that the subsurface soil at the Site was highly contaminated with organic contaminants similar to those found in the tanks at the Site which suggests that the subsurface soils are likely contaminated by wastes associated with the tanks and/or the former impoundments. In addition, it was noted that subsurface soil is exposed at the surface in a few areas from which direct contact or incidental inhalation or ingestion may occur. However, the subsurface soil predominantly poses a risk of release to shallow and deeper underground water systems. The contamination was observed by the OSC to be present at levels much deeper than the base of the former impoundments which indicates that the contamination is migrating deeper. The shallow ground water contained elevated concentrations of organic and inorganic contaminants, while the deeper ground water was contaminated by low levels of organic constituents.

- During the Phase I ESA Site reconnaissance, Penn E&R observed four aboveground storage tanks (ASTs). The ASTs included a 275-gallon waste oil tank located in the Maintenance Shop, a 1,000-gallon diesel fuel AST located in the Paint Shop, and a 10,000-gallon fuel oil AST and a 500-gallon diesel fuel AST located outside of the Boiler House. The ASTs appeared to be in fair condition with no obvious signs of leakage. In addition, seven ASTs/tank cars were historically used by TCCA to store hazardous materials. Most of these tanks were located to the north of the Maintenance Shop. These ASTs were subsequently decommissioned and removed from the Site by the USEPA and others.
- In addition to the current ASTs mentioned above, Penn identified several 55-gallon drums inside of the Maintenance Shop, Boiler House, and Paint Shop. Although the drums appeared to be in good condition with no apparent signs of leakage, the contents of the drums are unknown. Penn E&R observed a small wooden storage closet in the Boiler House which contains chemistry equipment and several small bottles of various chemicals and mixtures. Penn E&R conducted visual asbestos and lead-based paint surveys at the Site as part of this Phase I ESA. Based on the age of the Site buildings, it is possible that asbestos-containing material (ACM) and lead-based paint (LBP) could be present within the building materials. Suspect ACM observed during Penn E&R's visual assessment included insulation on the furnace and associated piping in the Boiler House. Painted surfaces observed in the Office building may contain LBP.
- As part of the ongoing Phase II ESA being conducted by BL Companies, a Hazardous Building Materials & Waste Disposal Inventory revealed that approximately 100 linear feet of roof sealant and approximately 500 square feet of 9-inch by 9-inch, resilient floor tile would be classified as Category I non-friable ACMs. In addition, approximately 500 square feet of joint compound; approximately 38,000 square feet of transit type wall and/or roof panels; approximately 100 linear feet of window glaze; and approximately 20 square feet of boiler backer board panel would be classified as Category II non-friable ACMs. Additionally, the Site buildings contain PACMs in the form of boiler and HVAC units; electrical conduit insulation; and approximately 2,000 square feet of roofing materials on the Office Building (upper roof) and Boiler House that were not sampled as part of the survey.

1.4 PROJECT GOAL

In 2015, the Township acquired the former TCCA site to remediation and redevelop the site for public use. The proposed redevelopment of the Site will include construction of a small community park that conceptually will include a baseball field, a walking path, open recreational space, and a single structure as a restroom facility. The redevelopment plans are intended to eliminate a source of local blight and to restore the Site to a useful purpose to benefit the community and local area residents

2. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1 CLEANUP OVERSIGHT AND RESPONSIBILITY

The cleanup will be overseen by an environmental professional, BL Companies in coordination with Springfield Township staff and environmental Counsel, Post & Schell, P.C. The Site has been entered into the Pennsylvania DEP Voluntary Cleanup Program (Act 2). All documents prepared for the Site will be submitted to the PA DEP.

2.2 CLEANUP STANDARDS FOR MAJOR CONTAMINANTS

The cleanup standards for the Site will be site-specific standards as provided for in the rules and regulations of Pennsylvania's Land Recycling and Environmental Remediation Standards Act of 1995 (Act 2).

2.3 LAWS AND REGULATIONS APPLICABLE TO THE CLEANUP

Laws and regulations that are applicable to this cleanup include the Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental laws, and Township by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits and notifications will be obtained prior to commencement of the work.

3. EVALUATION OF CLEANUP ALTERNATIVES

Based on the planned redevelopment of the Site, including the abatement by removal of all asbestos, and the removal and proper disposal of all Universal Waste are considered presumptive remedies, and cleanup alternatives were not considered for these contaminants and/or tasks.

To address contamination at the Site, three different cleanup alternatives were considered and are described below:

Alternative 1 - No Action:

Alternative 2 – Remediation, Demolition, Hot Spot Removal, and Capping:

Demolition of Site buildings containing hazardous materials and waste to eliminate those materials and remove blight. Remove hot spots of soil contamination as warranted. Cap residual soil contaminants with clean fill material brought to the property from off-site. Implement Activity and Use Limitations (AULs) requiring maintenance of the cap and prohibiting extraction of groundwater.

Alternative 3 - Remediation, Demolition, Removal of all Impacted Soil, and Active Groundwater Treatment:

Demolition of Site buildings containing hazardous materials and waste to eliminate those materials and remove blight. Removal of all impacted soil detected on the site. Actively treat groundwater. Implement Activity and Use Limitations (AULs) to prohibit extraction of groundwater as necessary.

3.1 ANALYSIS OF CLEANUP ALTERNATIVES

To satisfy the U.S. Environmental Protection Agency (EPA) requirements, the effectiveness, ease of implementability, resiliency to climate change, and cost of each alternative were considered prior to selecting a recommended cleanup alternative.

3.1.1 Effectiveness

Alternative 1 - No Action:

This alternative is not effective in controlling or preventing the exposure of others to contamination at the Site.

Alternative 2 – Remediation, Demolition, Hot Spot Removal, and Capping:

This alternative is effective and meets the requirements of applicable regulations. Although all impacted soil will not be removed, and groundwater will not be treated, exposure pathways to residual impacts will be eliminated through capping and the implementation of AULs, significantly mitigating the risk associated with these residual contaminants.

Alternative 3 - Removal of all Impacted Soil, and Active Groundwater Treatment:

This alternative and meets the requirements of applicable regulations. Since all impacts soil and hazardous materials would be removed from the Site, risk associated with the historic contaminants would be significantly reduced or eliminated.

3.1.2 Feasibility and Ease of Implementation**Alternative 1 - No Action:**

This alternative is easy to implement as no actions will be conducted.

Alternative 2 – Remediation, Demolition, Hot Spot Removal, and Capping:

This alternative would utilize standard techniques for the abatement of hazardous building materials, hot spot removal, and capping.

This alternative is practical and implementable.

Alternative 3 - Removal of all Impacted Soil, and Active Groundwater Treatment:

This alternative would utilize standard techniques for the abatement of hazardous building materials, impacted soil removal, and groundwater treatment.

This alternative is not feasible because it would be very costly. Removing all impacted soil at the property also would require special approval from EPA, because a significant portion of the impacted soil and hazardous materials were consolidated on-site and capped by EPA. Finally, groundwater treatment technologies may not be capable of restoring groundwater to background conditions.

3.1.3 Resiliency to Climate Change**Alternative 1 - No Action:**

This alternative will not be resilient to climate change.

Alternative 2 – Remediation, Demolition, Hot Spot Removal, and Capping:

Since all residual soil impacts would be capped beneath several feet of clean fill material, and all impacted groundwater is many feet beneath the ground, this alternative would be resilient to climate change.

Alternative 3 - Removal of all Impacted Soil, and Active Groundwater Treatment:

This alternative would remove source area soils and therefore would be resistant to climate change.

3.1.4 Cost Effectiveness

Alternative 1 - No Action:

There would be no cost associated with Alternative 1, though no remediation would be completed.

Alternative 2 – Remediation, Demolition, Hot Spot Removal, and Capping:

The cost of Alternative 2 is estimated to be \$600,000 - \$800,000, and is believed to be the most cost-effective remediation alternative available.

Alternative 3 - Removal of all Impacted Soil, and Active Groundwater Treatment:

The cost of Alternative 3 would be extremely costly. While the costs have not been estimated by a qualified environmental consultant, the Township understands this work would cost several millions of dollars.

3.2 RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup alternatives for each type of identified contamination at the Site are presented below: ***The recommended cleanup alternative is Alternative 2 - Remediation, Demolition, Hot Spot Removal, and Capping.***

Alternative 1 - No Action: Cannot be recommended since it does not address site risks.

Alternative 3 is prohibitively expensive, not necessary to mitigate against significant site risks, would require EPA approval, and has not been recommended by any environmental consultants or by PA DEP.

Alternative 2 is the only viable alternative to allow the Township to redevelop the site into a public park.

PUBLIC NOTICE

October 12, 2020

Springfield Township to pursue EPA Brownfields Clean-up Grant for former Tank Car Property



Springfield Township is applying to the United States Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant to remediate hazardous substances at a property known as the former Tank Car Corporation of America (Tank Car), located at 1725 Walnut Avenue.

The property was acquired by Springfield Township in 2015 and has been subject to several remediation activities for the eventual redevelopment of that site into a public park. The Township is now in the process of applying for funding from the U.S. Environmental Protection Agency (EPA)'s Brownfields Grant Program to initiate the next phase of that remediation and redevelopment process.

In order to update the community on Springfield's intent on applying for the Brownfields Cleanup Grant and obtain public input on the draft grant application, the Township will be hosting a public virtual meeting on **Monday, October 19, 2020 at 7:00 PM** with Township staff and the environmental consultants working on this project.

Topic: 1725 Walnut Avenue (Tank Car Site) Neighborhood Update

Time: Oct 19, 2020 07:00 PM Eastern Time (US and Canada)

Zoom Meeting Link: <https://us02web.zoom.us/j/86498034933>

Meeting ID: 864 9803 4933

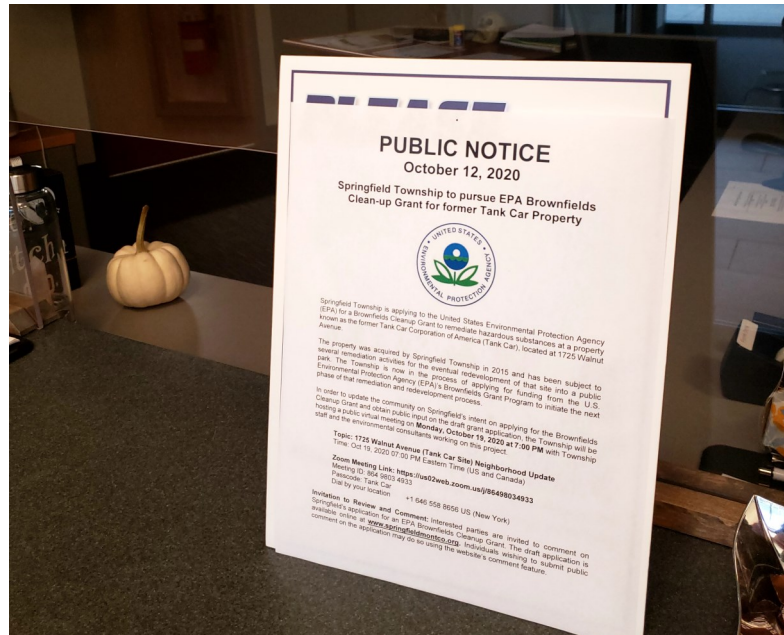
Passcode: Tank Car

Dial by your location +1 646 558 8656 US (New York)

Invitation to Review and Comment: Interested parties are invited to comment on Springfield's application for an EPA Brownfields Cleanup Grant. The draft application is available online at www.springfieldmontco.org. Individuals wishing to submit public comment on the application may do so using the website's comment feature.

Community Engagement Evidence

Public Notice on EPA meeting posted at front receptionist desk in Springfield Township Administration Building.



Community Engagement Evidence

Public Notice on EPA meeting posted on community bulletin board in Springfield Township Administration Building.





MEMORANDUM

TO: FILE
FROM: B. Ford

SUBJECT: Tank Car Corporation of America (TCCA) Site Public Meeting Notes;
Summary of Public Comment; Response to Comment

DATE: Oct. 27, 2020

This document contains a subset of the threshold documentation needed for the EPA Brownfields Cleanup Grant application, including notes from our publicly advertised meeting; a summary of public comment received in response to the advertised availability of the Township's draft application and Analysis of Brownfields Cleanup Alternatives.

As advertised, on the evening of 10/19/2020 the Township hosted a public meeting regarding our proposed and draft application to the U.S. Environmental Protection Agency for a Brownfields Cleanup Grant to be applied to the former TCCA site. The meeting was from 7 p.m. to 8 p.m. and was held virtual via the Zoom meeting platform due to social distancing guidelines and meeting restrictions.

The meeting has hosted by Township Manager Michael Taylor and myself; also in attendance were Commissioners Jonathon Cobb and James Lee, two local elected official for Springfield Township, as well as Michael McGowan and Randy Schick from BL Companies, an engineering and environmental services firm that is under contract with the Township to provide technical support and project management as the Township progresses the site through the Pennsylvania Voluntary Cleanup Program (Act 2).

In addition to posting information regarding the meeting and the opportunity for the public to learn about and comment on the Township's pending grant submission, letters were hand delivered to each of the properties adjacent to the former TCCA site the week prior to the meeting (October 12, 2020).

A total of fourteen citizens attended, as shown on the included sign in sheet. After an introduction of township officials and the representatives from BL Companies by Township Manager Michael Taylor, Michael McGowan and Randy Shick provided a brief overview of the site and its nature as a former industrial property. The BL Companies representatives also informed the public about the technical aspects of the current Phase II environmental assessments as well as the project's aim to remediate the site as a prerequisite for the eventual redevelopment of the area into a public park.

A summary of the hazardous building materials and waste disposal inventory was also shared and served as a justification for the activities covered as part of the Township's Brownfields Cleanup Grant application.

Mary Margaret Burke, a resident, asked for clarification regarding the impact of the proposed abatement and demolition activity on the work that was completed as part of the EPA removal action that took place 2006-2011. Randy Shick of BL Companies responded in stating that the proposed work would not impact the capping that was put in place by the EPA in years prior.

Attendees also inquired into whether the Township and selected contractors for the project (if awarded) would have controls in place to mitigate the amount of dust and debris. Michael McGowan confirmed that controls would be in place and that the hazardous materials would be abatement prior to demolition. Those in attendance were also informed that the range of potential alternatives available to the Township for the former TCCA is quite limited; Michael McGowan continued by stating that the preferred approach to dealing with the site is to abate and demolish the buildings, and then cap the entire property with fresh soil.

Brandon Ford then educated the public about the Township's DRAFT EPA Brownfields Clean-up Grant application, funding amounts, and an estimated timeline should the grant be awarded. With no further questions from the public, the meeting adjourned at 8:49 PM.

Those in attendance did not identify any concerns specific to cleanup strategy, nor make any formal comments that required written reply additional to the discussion we had about the timing of the project.

Comments Received and Response to Comment

The Township did not receive any written, email, or telephone comments.

PARID: 520017821001

SPRINGFIELD TOWNSHIP

1725 WALNUT AVE

Parcel

TaxMapID	52052 012
Parid	52-00-17821-00-1
Land Use Code	9940
Land Use Description	E - EXEMPT - LOCAL MUNICIPALITY
Property Location	1725 WALNUT AVE
Lot #	
Lot Size	7.89 ACRES
Front Feet	1193
Municipality	SPRINGFIELD
School District	SPRINGFIELD TWP
Utilities	ALL PUBLIC//

Owner

Name(s)	SPRINGFIELD TOWNSHIP
Name(s)	
Mailing Address	1510 PAPER MILL RD
Care Of	
Mailing Address	
Mailing Address	GLENSIDE PA 19038

Current Assessment

Appraised Value	Assessed Value	Restrict Code
50,700	50,700	Exempt

Estimated Taxes

County	0
Montco Community College	0
Municipality	0
School District	0
Total	0
Tax Lien	Tax Claim Bureau Parcel Search

Last Sale

Sale Date	08-SEP-15
Sale Price	\$0
Tax Stamps	
Deed Book and Page	5976-01430
Grantor	TANK CAR CORP OF AMERICA
Grantee	SPRINGFIELD TOWNSHIP
Date Recorded	30-OCT-15

Sales History

Sale Date	Sale Price	Tax Stamps	Deed Book and Page	Grantor	Grantee	Date Recorded
09-08-2015	\$0		5976-01430	TANK CAR CORP OF AMERICA	SPRINGFIELD TOWNSHIP	10-30-2015
01-01-1921	\$0	0	-		TANK CAR CORP OF AMERICA	

Lot Information

Lot Size	7.89 ACRES
Lot #	
Remarks	
Remarks	
Remarks	

Commercial Parcel Summary	
No. of Cards	5
Land Use Code	9940
Gross Building Area (Total of all Cards)	34,980
Total Living Units	

Commercial Parcel Summary	
Use	Area
DWG CONV-OFFICE	3,001
WAREHOUSE	31,979

Commercial Card Summary		1 of 5
Card	1	
Imp Name	TANK CAR CORP OF AMERICA OFFIC	
Structure Code	105	
Structure	MIXED RESIDENTIAL/COMMERCIAL	
Sprinkler	N	
Units		
Identical Units	1	
Year Built	1957	
Gross Building Area	2,761	
Elevator/Escalator	N	

Accessory Structures				
Card	Type	Type	Size	Year Built
1	RR1	TRACK, RAILROAD	300	1919
1	RS2	METAL UTILITY SHED	280	1960
1	PC1	PAVING CONCRETE AVERAGE	200	1960
1	RS1	FRAME UTILITY SHED	648	1960
1	CP5	CANOPY ONLY	720	1957
1	CP5	CANOPY ONLY	2000	1957

Assessment History					
Appraised Value	Assessed Value	Restrict Code	Effective Date	Reason	Notice Date
50,700	50,700	Exempt	01-JAN-16	EXEMPTION APPROVED	04-AUG-16
50,700	50,700		01-JAN-08	APPEAL	10-OCT-07
553,740	553,740			O	16-MAY-97
	553,740		01-JAN-98	REASSESSMENT	
	49,200		01-JAN-87		