

## **CROYDON PUBLIC COMMENTS**

RT ENVIRONMENTAL SERVICES, INC.  
WILL KEEP THE PUBLIC COMMENT PERIOD  
OPEN UNTIL SEPTEMBER 30, 2011

COMMENTS SHOULD BE SENT TO:  
RT ENVIRONMENTAL SERVICES, INC.  
ATTN: LAWRENCE W. BILY  
215 WEST CHURCH ROAD SUITE 300  
KING OF PRUSSIA, PA 19406

OR

[LBILY@RTENV.COM](mailto:LBILY@RTENV.COM)

## QUESTIONS AND ANSWERS

- Q. Why not excavate and remove all waste?  
A. Material on the site will be consolidated and capped, meeting all DEP requirements. This is permitted under the Act 2 Program by DEP. A low rise area which consists of hazardous wastes, will be excavated and removed.
- Q. Who is responsible, kids will play there?  
A. Person who originally generated the materials and placed the materials, is responsible for the material being present at the site. Under Act 2, the "remediator" accepts responsibility for successful completion of the clean-up, which includes capping, and ultimately, there will be maintenance requirements for the cap.
- Q. Where is the hazardous lead waste?  
A. The presenter in the public meeting showed the location of this material on the plan, and a copy of that is attached.
- Q. How you know you have identified everything?  
A. This investigation work, and the frequency of sampling, followed appropriate DEP protocols. Part of that involves asking questions today, on input from surrounding property owners, on any additional information that you wish to let us know of.
- Q. How many samples were taken?  
A. Sampling follows DEP protocols – 12 samples per 3,000 cubic yards. Additional samples will be taken at the time of removal and consolidation of the material. The total number of samples taken to date is 24.
- Q. The information you gave us is hard to believe – the area was a filled in swamp.  
A. Additional delineation was completed to confirm the volumes, and the exact locations of material.
- Q. When the property is built on by anyone will more testing be done?  
A. Work is being complete and remediation will be completed prior to construction of any residences. As remediation work will have been completed prior to construction of buildings, no further testing will be required.
- Q. Have roads been tested – sub-base under the roads came from a steel mill.  
A. Crushed slag rock material from US Steel Plant, is commonly used in road base throughout lower Bucks County. This does not require testing, as an area of concern, under the Act 2 Program, as the material is considered to have been beneficially used.
- Q. There were drums present behind the laundry, which used to be present at the site. Has this area been tested?  
A. No testing is not been completed in that area, but testing will be completed to make sure that there are not concerns.

- Q. There is concerns that drums will be located, as they were there 55 years ago.  
A. Magnetic locating equipment will be used to check for the presence of drums, and if any are located during excavation, they will be appropriately managed.
- Q. Will there be a fence around the area?  
A. Yes a construction fence and a silt fence will be placed around the excavation area during the time that it is active.
- Q. What about cesspools - (12 of them)  
A. If encountered, they will be handled during site work – concrete can be crushed and left on site.
- Q. Only two places undeveloped and tested are in the open areas?  
A. The remedial design is to place material in the two areas for consolidation.
- Q. Is the report available on line?  
A. Yes at [www.rtenv.com](http://www.rtenv.com).
- Q. When will work be done?  
A. In late fall or early spring of 2012. By time E&S approval is obtained from the Conservation District, it will probably be next year.
- Q. Who is responsible for watching the cap for next 50 years?  
A. Probably a Homeowners Association.
- Q. Who tells them – future homeowners?  
A. It goes in the Deed. Most developers put this information in the sales trailer when the houses are being offered.
- Q. Is it that much more in cost to remove all material than to consolidate and cap it?  
A. Yes – hundreds of thousands of dollars.
- Q. That means there is a lot of stuff there?  
A. Enough to made removal cost prohibitive. Under Act 2, the Client can pick an appropriate plan to remediate site.
- Q. Will there be monitoring during site work?  
A. Yes
- Q. Will Developers report if they find something?  
A. Yes. The Developers we work with are reputable and will report unusual findings for further evaluation.
- Q. If you stand on Second Avenue, it slopes up - what happens to groundwater?  
A. Two feet of buffer will be maintained on the cap placed over the consolidated material.

- Q. Where will water go from the hills that will be built?  
A. The County Conservation District has to approve an Erosion and Sedimentation Control Plan (E&S Plan) designed to not change overall runoff volume from the site. Runoff will be managed in infiltration areas, or else the Township Engineer will require storm sewer connection. Note that the cap is soil, not impervious clay.
- Q. If there is a hill it will cause sheets of runoff.  
A. That will be accounted for in the E&S Plan.
- Q. Where will clean soil come from?  
A. The soil underneath the impacted material was tested and found to be clean.
- Q. Won't moving activities change what's in the soil?  
A. Chemical composition doesn't change just because soil is moved.
- Q. Why isn't DEP here tonight?  
A. They were given the option to attend.
- Q. Main thing – they are not cleaning up because of money?  
A. Remediation will be completed in accordance with the DEP Act 2 Land Recycling Program.
- Comment – Some people would rather see site left alone.
- Comment – Some people would like to see all material removed.
- Comment - People were threatened by developers; one woman's father was told – better to keep your mouth shut.
- Q. Who should be contacted at the DEP with questions about the site or the Plan?  
A. Walter Payne is the person at DEP to contact with complaints/comments about the plan.
- Q. What is the time frame?  
A. About 30-45 days for E&S Plan approval. Work could start in late October or early November. However, it will more likely occur in spring of next year.
- Q. Where will material go (person had arrived late)  
A. Impacted material, ash/rubber debris will be placed in the two consolidation areas. Some material with high lead concentrations will be taken offsite.
- Q. What about material in foundation areas?  
A. Material in those areas was found to be only two feet deep, and it will be removed before construction.

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Q. You are only giving us twenty days to comment on the Plan?

A. What would you like?

Answer: Until next February.

We will wait 21 days from tonight (August 29, 2011-September 19, 2011)

Does anyone have anything new?

(No Comments)

