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Mr. Robert P. Thomas, AIA
Project Manager
Campbell Thomas & Co.
1504 South Street
Philadelphia, PA 19146-1636

Reference: Schuylkill River Trail and Freedom Trail Project

Subject: Preliminary Site Investigation Report

STV Project No.: 30-12665

Dear Mr. Thomas:

STV is pleased to submit this letter report documenting limited site characterization activities and findings as related to preliminary investigation review of the proposed segments of the Schuylkill River Trail and Freedom Trail. This report details January 2006 field reconnaissance activities performed by STV. STV prepared this Draft Preliminary Site Investigation Report based on visual evaluation of potential hazardous waste materials and sites, along with non-intrusive review of suspected wetland areas along the selected trail route.

1.0 PROJECT BACKGROUND AND PURPOSE

The Schuylkill River National and State Heritage Area is proposing to construct the Schuylkill River Trail and Freedom Trail (trail) along approximately twenty miles of the abandoned Schuylkill canal towpath, existing trail routes, and public and private roadways and properties. The trail will connect several existing trails and is considered a critical link to an inter-county railway system. To meet this goal, project-specific environmental studies, preliminary and final right-of-way (ROW) planning, and acquisition of the abandoned towpath and private properties, have been initiated by the project planning committee.

STV conducted limited site characterization activities along the proposed trail during the month of January 2006. The purposes for performing field reconnaissance along the trail were to visually determine general locations of wetland complexes, and visually identify locations of potential hazardous wastes and/or waste generators. This report documents those activities and includes the methodology, implementation, results, findings, and recommendations. Using these data, the project planning committee can better evaluate the need for further studies and environmental clearance documentation, and their associated costs. This environmental



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investigation will assist the project planning committee in making sound decisions regarding preliminary and final right-of-way planning and future pre-construction operations as they relate to potential hazardous waste materials and/or wetlands habitat found on or adjacent to the trail. STV walked or drove the length of the proposed trail in its entirety. Available mapping and aerial photography were utilized to document and record areas in the event of wetlands identification or hazardous materials observation. STV took note of varying topographic conditions and proximity to public and private roads and abutting private properties and businesses. Indicators of wetlands habitat and potentially hazardous materials were visually investigated and duly documented.

2.0 SCOPE OF INVESTIGATION

STV focused its environmental studies on a single preferred trail route identified and mapped by the project planning committee. Reconnaissance activities were limited to those features identified on lands within 100 feet of either side of the trail corridor centerline. STV collected current and past land use information to verify the potential of recognized environmental conditions as defined under Section 1.0; subparagraph 1.1.1 of ASTM E 1527-00 and reviewed secondary source information pertaining to the proposed trail corridor. These data sources included National Wetlands Inventory (NWI) wetland maps, geology maps, soils maps, and topographic maps as well as mapping supplied by Campbell Thomas & Co. (wetlands and floodplains aerial) to initiate characterization of the environmental setting along the proposed trail route. STV did not obtain project specific environmental database records.

STV did not collect physical samples of potentially hazardous soils or groundwater. Rather, field personnel conducted non-intrusive, visual reconnaissance for the presence of potential hazardous waste sites and/or hazardous waste generators along and adjacent to the proposed trail. Findings of the visual evaluation are documented in the following report. Further, wetland areas were identified based on a visual inspection of in-field conditions only.

3.0 FINDINGS AND RECOMMENDATIONS

Findings

The trail route traversed a mix of businesses, residential properties, and public and private land use areas. Miscellaneous debris and discarded materials were observed within the proposed ROW along several areas; further visual investigation revealed the majority of these to be a mix of wood, brick, empty drums, and other miscellaneous scrap material. The discarded, 55-gallon, metal drums appeared empty and were not labeled.

Electrical transformers pose an environmental concern when they contain PCB-laden dielectric oil. In the event of an accidental release, PCBs may enter subsurface soils and groundwater. During the site walk, STV did not identify any transformers whose condition would suggest existing environmental conditions are present along the proposed ROW. Photographs of the proposed trail ROW and abutting properties are found in Appendix B.



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The following sites were identified as potential areas of concern for hazardous wastes or hazardous waste generators:

Railroad Right-of-Way

The proposed trail parallels and crosses historic (inactive) and existing (active) railroad rights-of-way. Numerous railroad ties were identified within the former and active rail beds. These ties may pose a potential environmental hazard, as railroad ties were traditionally treated with coal tar creosote. Exposure to coal tar creosote volatiles may be harmful to the public. STV also identified and documented the location of the Blue Mountain & Reading Railroad rail yard, adjacent to Route 61 in Hamburg, which contains numerous out-of-service train engines and freight and passenger cars. The trains had been located on the premises for an undetermined period of time; the majority of the trains appeared in a poorly maintained condition.

Carpenter Technology

Segments of the proposed trail traverse portions of the Carpenter Technology Corporation (Car Tech) property. STV is currently coordinating access agreements to allow a detailed inspection of the proposed trail route through the Car Tech property. USEPA public database records indicate that Car Tech is a known generator and user of numerous hazardous chemical compounds and manufacturing byproduct materials. This report will be duly updated per future correspondence to reflect site visits or interviews with Car Tech personnel.

'Embankment'

Project planning committee personnel were provided the location of buried lead battery casings adjacent to the trail route. Interviews with adjacent property owners revealed the approximate vicinity and linear extent of the buried casings which, according to interviewees, had been historically used as fill material to create an embankment adjacent to the trail. Site characterization activities as to include soils and groundwater sampling within proximal areas of suspected lead battery casings may be recommended.

Recommendations

Based upon the findings of the existing conditions assessment conducted along the proposed Schuylkill River Trail and Freedom Trail ROW, the following recommendations are offered.

Conduct detailed wetlands delineation in accordance with U.S. Army Corps of Engineers (USACE) 1987 Wetlands Delineation Manual to determine the presence of jurisdictional wetlands within and adjacent to the proposed ROW. Impacts to project area wetlands are regulated by Pennsylvania Department of Environmental Protection (PADEP) and USACE through appropriate coordination and permitting processes. Impacts to wetlands will require permitting with these agencies.

Investigations of several existing and former business operations, specifically those operations which historically supported the former railroad, may be required. More thorough site



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investigation activities to include a complete on-the-ground site walk are recommended to further characterize trail conditions with respect to the presence or absence of uncontrolled hazardous wastes or waste generators. Additional corridor investigation findings may result in the conclusion that soil sampling activities are warranted in selected areas. The results of these additional project area characterizations will further enable the project planning committee to make sound decisions regarding cost estimates for trail development and ROW activities.

4.0 LIMITATIONS

This report has been prepared for the sole use of Campbell Thomas & Company, and its assignees. Varying amounts of professional judgment and opinion were required of STV's environmental professionals during review of the proposed trail right-of-way conditions and development of conclusions and recommendations. In view of the dynamic nature of environmental laws, regulations, standards, and guidelines, STV's opinions and recommendations are based on site conditions at the time of this investigation and do not apply to future project area land use changes or other past site conditions of which STV is unaware.

No environmental site assessment can completely eliminate uncertainty regarding the potential for recognized environmental conditions on a property; therefore, STV cannot "certify" the entire project area is free of environmental contamination. STV performed this investigation in a manner consistent with the customary thoroughness and competence exercised by environmental and engineering consulting professionals currently practicing in the same locality under similar conditions.

If you have any questions or need additional information or would like to discuss the above recommendations in further detail, please call me at 610-385-8355 or Mr. Steve Sottung at 610-385-8262.

Sincerely,

Peter M. Gaskins
Environmental Scientist
STV Incorporated