

July 7, 2020

Mr. Dustin Armstrong
Environmental Cleanup Program
PA Department of Environmental Protection
2 East Main Street
Norristown, Pennsylvania 19401

Re: Bishop Tube Site
2019 Remedial Investigation Report (“RIR”);
2019 Feasibility Study Report (“FS Report”); and
2020 Remedial Alternatives Analysis for Soils (“RAA-Soils”).
Response to DEP Comment Letters dated June 11, 2020 and June 18, 2020, on the RIR and the
FS Report, respectively, and Comments on GES’ RAA-Soils when distributed by DEP.

Dear Mr. Armstrong:

In letters dated June 11, 2020 and June 18, 2020, the Pennsylvania Department of Environmental Protection (“DEP”) provided comments on the Remedial Investigation Report dated June 10, 2019 (“RIR”) and the Feasibility Study (“FS”) Report dated June 17, 2019 (“FS Report”) together with those of their General Technical Assistance Contractor, Groundwater & Environmental Services, Inc. (“GES”). DEP’s comments were in response to the following:

- The Bishop Tube Project Team’s (“BT Team”) letter dated March 20, 2020, responding to DEP’s comments on the RIR provided in DEP’s letter dated October 11, 2019 (as clarified in discussions at three meetings and two conference calls among the BT Team, DEP, and GES between December 2019 and February 2020); and
- The BT Team’s letter dated April 2, 2020, responding to DEP’s comments on the FS Report provided in DEP’s letter dated October 28, 2019 (as clarified in discussions at three meetings and two conference calls among the BT Team, DEP, and GES between December 2019 and February 2020).

DEP has advised the BT Team that a Remedial Alternatives Analysis for Soils (“RAA-Soils”) prepared by GES will be circulated to the BT Team by DEP in the near future.

In its RIR and FS Report comment letters, the DEP requested a 30 day response by the BT Team for circulation of “mark-up” versions of the text/tables/figures/appendices of both documents, and suggested that Roux had already prepared responses to most of DEP’s comments.¹ This timing is not realistic, however, because an integrated response is necessary to effectively complete the RIR, the FS Report, and assess the RAA-Soils. This integrated response is necessitated by a) the prescriptive editing of the RIR and FS Report by DEP and GES, b) the near-concurrent submission of these two documents as previously dictated by DEP, c) the need to carry DEP-approved RIR language into various RIR appendices (i.e., the Human Health Risk Assessment Report, the Ecological Risk Assessment Report, and the Groundwater Modeling Report), d) the need to carry DEP-approved RIR language into

¹ DEP’s suggestion that Roux “already prepared responses to most of DEP’s comments” is incorrect. Roux’s responses in its March 20, 2020 and April 2, 2020 letters clearly illustrate which DEP comments already had a prepared response (i.e., those responses where Roux provided precise language that was requested/approved by DEP). For all other comments, Roux was awaiting DEP’s response letters.

Mr. Dustin Armstrong
July 7, 2020
Page 2

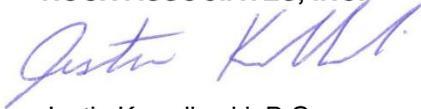
the FS Report, and e) the need to consider and cite to the RAA-Soils in the revised FS Report as requested by DEP (DEP FS Comments, pg.4).

Given all of the above, in terms of anticipated timing, the BT Team expects to be in a position to convene the DEP-requested conference call within 2 weeks of the receipt of the RAA-Soils, allowing 1 week for review of the RAA-Soils and 1 week to select a mutually-agreeable date for DEP, GES, and the BT Team for the conference call. In the interim, the BT Team will continue its review of and response to the DEP's and GES' RIR and FS comments. The BT Team will present to DEP proposed steps and an anticipated schedule for circulation of "mark-up" versions of the text/tables/figures/appendices of both documents during the conference call for DEP's approval. The approved steps and schedule can then be documented in the next progress report.

Should you have any questions or comments, please contact the undersigned at (856) 423-8800.

Sincerely,

ROUX ASSOCIATES, INC.



Justin Kowalkoski, P.G.
Senior Geologist



Greg Martin, P.G.
Vice President/Principal Hydrogeologist

cc: Richard Staron, PADEP
Bonnie McClennen, PADEP
Adam N. Bram, PADEP
John Nagel, East Whiteland Township, Manager
East Whiteland Township, EAC
Bishop Tube Project Team