



January 11, 2017

Mr. Gregory D. Martin, P.G.
Roux Associates
402 Heron Drive
Logan Township, NJ 08085

Re: Bishop Tube Site
Response to DEP Comments & FSWP Addendum and Revised Schedule

Dear Mr. Martin:

DEP has reviewed the documents referenced above that were submitted on behalf of the Bishop Tube Project Team on December 16, 2016. Our comments and responses associated with each submittal are provided below.

Remedial Investigation (RI) and Treatability Study Completion Reports
Response to DEP Comments

Vapor Intrusion

DEP approves the supplemental RIWP work associated with the investigation of vapor intrusion including the plan for follow up sampling at 97 Village Way and 39 Conestoga Road, and the sampling procedures described in the "IAQ Work Plan" submitted via email on December 16, 2016. We offer the following additional comments for your consideration:

- DEP's positions regarding evaluation of the non-cancer risk and land use determination for the 54 and 39 Conestoga Road properties, respectively, are accurately stated in the response letter.
- As indicated in prior correspondence, collection of a sub-slab sample at 154 Lancaster Avenue concurrently with the proposed indoor air sampling may help attribute indoor air conditions to vapor intrusion or link them to use of volatile chemicals within the building.
- The plan for following up past detections of site-related CVOCs in indoor air at 54 Conestoga Road relies on an assumption that concentrations have declined. If such a decline is confirmed, additional regular sampling of indoor air over an extended time period would be necessary to ensure that risks associated with vapor intrusion continue to be below the risk thresholds.

- The proposed cumulative vapor intrusion risk assessment planned for groundwater should be evaluated to determine if follow up sub-slab, indoor air or soil gas sampling are needed to evaluate existing occupied structures in the vicinity of the shallow groundwater contamination associated with the site. If follow up sampling is necessary, it should be initiated during the current heating season, if possible.

Source Area and Groundwater Delineation

- DEP will review and comment on the Supplemental RIWP. Please note that we continue to believe that additional delays to the completion of the RI associated with installation of more downgradient, deep bedrock monitoring wells are unnecessary. Preparation of a 30-year model, which incorporates existing data gathered during the RI and the additional sampling effort proposed in this response, will provide an accurate and defensible predictive model. As previously stated, in our June 20, 2016 letter, the model should be sufficiently conservative to serve as a preliminary screening tool for assuring that exposure pathways are not opened in the future.
- Will groundwater to indoor air screening levels be incorporated into the distance versus concentration analysis in addition to medium specific concentrations (MSCs), to assess potential groundwater discharge areas? The following section (*Assessment of Vapor Intrusion along Little Valley Creek*) seems to indicate they will. Please clarify.

Northeast Corner of Site – Potential DNAPL Source Area

- DEP continues to believe that additional soil delineation is needed in the northeast corner of the Site. The coverage of soil borings in the area is limited and several borings referenced in the response, were installed by BCM, Inc. in the 1980s, with no indication that a PID was used. Additionally, the sample result for MW-8-SB, collected by Roux is 50,000 µg/kg. The soil to groundwater MSC is 500 µg/kg for TCE. The location of this sample is isolated from the other known source areas.

Schedule

- Please provide a more detailed schedule, which includes anticipated DEP review periods for document submittals.
- In our May 31, 2016 letter requesting preparation of a Feasibility Study, DEP requested expedited completion of the Feasibility Study (FS). As discussed in our December 6, 2016 conference call, DEP also requests expedited completion of the RI.
- The response indicates that two rounds of groundwater sampling will be performed. However, the schedule seems to include only one round of sampling (Q2 – 2017). Please clarify. (If sampling is planned for the first quarter - 2017, a separate plan for

the groundwater monitoring may be submitted for review prior to submitting the Supplemental RIWP).

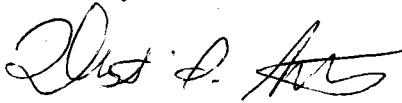
Feasibility Study Work Plan (FSWP) Addendum and Revised Schedule

DEP has reviewed and approved the FSWP and the FSWP Addendum including the list of assumptions identified in the FSWP Addendum. If there is a need to revise the schedule as it is approved, please provide a written request in accordance with the COA. DEP reserves the right to request that the FSWP be amended to include additional soil analysis should Constitution Drive Partner's ("CDP") proposed soil remediation fail to occur.

As requested in previous correspondence, please continue to coordinate RI and FS work with CDP as soil remediation and redevelopment efforts move forward.

If you have any questions, please feel free to call me at darmstrong@pa.gov or by phone at 484.250.5723.

Sincerely,



Dustin A. Armstrong
Environmental Protection Specialist
Environmental Cleanup

cc: Ms. McClennen
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