



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHEAST REGIONAL OFFICE

July 29, 2011

Mr. Gerald Kirkpatrick
Environmental Standards, Inc.
1140 Valley Forge Road
Valley Forge, PA 19483

Re: ECP - Land Recycling Program
Bishop Tube
eFACTS No. 617200
1 South Malin Road
East Whiteland Township
Chester County

Dear Mr. Kirkpatrick:

The Department of Environmental Protection (Department) has received and reviewed the June 14, 2011, document titled "Final Report," for the property located at 1 South Malin Road in East Whiteland Township, Chester County. The report was prepared by Environmental Standards, Inc., and submitted to the Department in accordance with the Land Recycling and Environmental Remediation Standards Act (Act 2) and constitutes a "Final Report" as defined in Chapter 3, Section 303 of Act 2.

A Final Report summary has been attached which describes the area(s) of the property characterized, contaminants identified, remediation performed, and that a residential Statewide Health Standard was attained in soil for PCB aroclor 1254 and 1260. A figure depicting the areal extent and the reference coordinates of the sites remediated is included. The Department approves this report for the substances identified in soil and remediated to an Act 2 standard within the site(s) specified. Chapter 5, Section 501 of Act 2, provides the liability protection where attainment of Act 2 cleanup standards is demonstrated. Cleanup liability protection provided by this chapter applies to the current and future owner or any other person who participated in the remediation; a person who develops or occupies the site; successor or assign of any person to whom liability protection applies; and public utility to the extent the public utility performs activities on the identified site.

Although remediation under Act 2 is now complete for this site, you are advised that any future earth disturbance or development may require either approvals or permits from the appropriate county soil conservation district. Therefore, you should contact the conservation district before engaging in any such activities. Upon cessation of any groundwater treatment system and/or the elimination of the discharge from a treatment system associated with a National Pollutant Discharge Elimination System (NPDES) permit, please submit a request to cancel the NPDES permit to the Department's Water Management Program.

Thank you for your cooperation in working with the Department in the remediation of this site. Your efforts are helping to return land to productive use and prevent the needless loss of green space across the Commonwealth.

If you have any questions or need further information regarding this matter, please contact Mr. Chris Falkler at 484.250.5794.

Sincerely,



Stephan Sinding
Regional Manager
Environmental Cleanup

Attachment

cc: Mr. Payne
Mr. Falkler
Mr. Molina
Permitting Chief - Water Management
Ms. Bass
Ms. Fields
Mr. Miller
Mr. Wentzel
Mr. R. Patel
Mr. Armstrong
Mr. Sheehan
Anderson Hartzell, Esq.
Mr. Heany – Constitution Drive Partners
East Whiteland Township
Chester County Health Department
Chester County Conservation District
Re 30 (GJS11)205-8



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHEAST REGIONAL OFFICE

MEMO

TO File

FROM Christopher Falkler, Soil Scientist *CF*

THROUGH Walter Payne, PG *WP*

DATE July 27, 2011

RE X Special Projects/Act 2 617200
 Bishop Tube
 1 South Malin Road
 East Whiteland Township
 Chester County

Owner/Client Name: Constitution Drive Partners, c/o Richard Henry

Owner Mailing Address: 2701 Renaissance Boulevard, 4th Floor
King of Prussia, PA 19406

Act 2 Standard Attained: X Soil

<input type="checkbox"/> SS	<input type="checkbox"/> BG	X SHS (residential)
<input type="checkbox"/> GW	<input type="checkbox"/> SS	<input type="checkbox"/> BG
		<input type="checkbox"/> SHS

Brief Project Site History: Soil remediation activities were undertaken at the site in response to vandals who unlawfully gained access to the secured outdoor electrical substation at the property. As part of their illicit activities, the vandals drained a transformer of its oil contents upon removing the transformer from the substation.

There were three transformers. With the one stolen, the other two were sampled to determine what PCBs the oil may contain. Transformer 1 detected araclor 1260 and transformer 2 did not contain any PCBs.

Interim Remedial Actions: PCB araclor 1260 is not a COPIAC.

Site Findings: Absorbent pads and oil dry were applied as emergency response measures. Two areas were identified to be impacted from the PCB release.

1. Visually impacted soil was excavated in the driveway area around the exterior shoulder of the storm water inlet. Cracks in the asphalt enabled the oil to seep to the surface.
2. To determine the extent of the impact to the drainage ditch, a oil sheen was visually traced at the site upslope from the ditch. The oil sheen was visually observed for approximately 150 feet within a grated culvert and concrete trough to a concrete junction box which accepts 30" corrugated metal pipe and 24" reinforced concrete pipe. A small amount of oil was identified in both the 24" reinforced concrete pipe and 30" corrugated metal pipe. It was determined that there was an apparent relationship between the transformer oil release and the oil encountered in the 24" reinforced concrete pipe and the 30" corrugated metal pipe, trough, grated culvert, and drainage ditch. Two soil samples were collected where the oil had seeped and analyzed for PCBs. Soil results reported arochlor 1260 above the 9 ppm rSHS MSC (30 ppm and 10 ppm). To properly remediate the conveyance, all piping would have to be removed.

Site Cleanup History:

- NIR/NOC Receipt Date: N/A 90 day report
- Cleanup Start/SCR Received Date: 3/16/2011
- Cleanup Completion Date: 5/5/2011

Discussion of Cleanup Involved and Demonstration of Attainment: A total of 208.59 cubic yards of PCB impacted soil was excavated and properly disposed of.

After excavation of the driveway area (64.5 cubic yards), eight post remedial soil samples were collected and analyzed for PCBs. Aroclor 1260 was the only PCB detected, but the analytical results for soil were below the residential SHS.

Following the removal of the 24" reinforced concrete pipe and 30" corrugated metal pipe, eleven soil samples were collected and analyzed for PCBs. Aroclor 1254 was detected in one soil sample (SS-17) and aroclor 1260 was detected in several soil samples, but all detections were below their respective residential SHS MSCs. The detection aroclor 1254 is believed to be a relic of historical site activity since it was not previously identified in oil samples obtained to characterize the contents of the remaining two transformers or site characterization soil samples.

Demonstration of attainment of the residential SHS has been proven for the PCB aroclor 1260 with no soil analytical result exceeding its residential SHS MSC.

DEP Final Action Approval/Disapproval Letter: approved July 27, 2011

DEP Contact: Christopher Falkler, Soil Scientist
Southeast Regional Office **PHONE:** 484.250.5794

Site Contact: Gerald Kirkpatrick, PG
Environmental Standards, Inc.
1140 Valley Forge Road
Valley Forge, PA 19482 **PHONE:** (610) 935-5577

cc: RCSOB LRP (w/Report Summary and Final Letter)
Mr. Sinding (w/Review Letter)
Re 30