



May 31, 2017

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

Re: Former Bishop Tube Site
2017 Supplemental Remedial Investigation Work Plan and Response to DEP Comments
on Vapor Intrusion

Dear Mr. Armstrong:

On behalf of the Bishop Tube Project Team (“BT Team”), Roux Associates, Inc. (“Roux Associates”) is providing three copies of the enclosed 2017 Remedial Investigation (“RI”) Work Plan (“WP”) dated May 31, 2017, for your review and approval. This 2017 RIWP was prepared to address outstanding activities necessary to complete the RI for the Site, including a vapor intrusion (“VI”) building survey of 39 Conestoga Road and the installation and sampling of a sentinel monitoring well network.

In addition to transmitting the 2017 RIWP, this letter responds to the Pennsylvania Department of Environmental Protection’s (“DEP”) comments related to VI in an e-mail dated February 23, 2017 as further discussed and clarified with DEP during technical conference calls on April 26 and May 10, 2017.

The responses provided below are presented to document the status of DEP’s outstanding comments on VI and to ensure that the enclosed 2017 RIWP satisfies DEP’s requirements for completion of the RI. A separate communication will respond to DEP’s comments regarding the Preliminary FS Screening Memorandum.

The following responses are based on DEP’s comments on VI in an e-mail dated February 23, 2017 and subsequent communications between the BT Team and DEP. A copy of DEP’s e-mail is provided as an attachment to the 2017 RIWP.

1. One round of indoor air quality (“IAQ”) sampling was conducted at 160 Lancaster Avenue and the results demonstrated the vapor intrusion pathway was not complete. As agreed with DEP, a second round of sampling will be conducted in the future, during the heating season¹, as part of a post-RI monitoring program for VI. A work plan for additional IAQ sampling will be submitted for DEP review and approval following completion of the RI.

¹ The BT Team and DEP agreed that the second round of IAQ sampling would occur during a future heating season despite the absence of a permanently installed heating system at this property.

2. As agreed with DEP, additional VI monitoring of 140 Lancaster Avenue is not required as all compounds screened out of the cumulative risk evaluation for groundwater for this property based on the data from permanent monitoring well MW-36.
3. As agreed with DEP, the BT Team will evaluate building construction at 39 Conestoga Road to determine whether supplemental IAQ samples are required in the future. The proposed scope of work for this supplemental inspection task has been included in the attached 2017 RIWP. Results and recommendations will be presented in the supplemental RI Report.
4. As agreed with DEP, the depiction of potential VI impact will be addressed in the supplemental RI Report.
5. As discussed and agreed with DEP, a) the need for and scope of any supplemental IAQ sampling at 39 Conestoga Road will be based on the results from Item 3, above, and b) based on the cumulative risk evaluation for groundwater and the recent and historical IAQ sampling results, the VI assessment is complete for the Village Way properties located to the east of the former Bishop Tube property.
6. Cumulative risk screening to be included in the supplemental RI Report will evaluate 1,1-Dichloroethene ("1,1-DCE").

The schedule for completion of the supplemental 2017 RI activities is attached to the RIWP and shows an estimated submission date for the supplemental RI Report of October 31, 2017. A revised schedule for completion of the FS will be submitted in the future, but at present, it is anticipated that the FS Report will be largely completed on a parallel timeline as the supplemental RI Report and will be submitted approximately one month after the supplemental RI Report.

Should you have any questions or comments or need additional copies the 2017 RIWP, please contact either of the undersigned at (856) 423-8800.

Sincerely,
ROUX ASSOCIATES, INC.



Justin Kowalkoski, P.G.
Senior Geologist



Gregory D. Martin, P.G.
Vice President/Principal Hydrogeologist

cc: Richard Staron - PADEP
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Bishop Tube Project Team