



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

August 3, 2017

Mr. Guy Wolfington
Constitution Drive Partners L.P.
2701 Renaissance Blvd, 4th Floor
King of Prussia, PA 19406

Mr. Stephan Brower
Environmental Standards, Inc.
1140 Valley Forge Road
P.O. Box 810
Valley Forge, PA 19482-0810

Re: Bishop Tube Site
Pipe Discharge Mitigation Plan

Dear Mr. Wolfington and Mr. Brower:

On July 19, 2017, the Pennsylvania Department of Environmental Protection (“DEP”) received the above-referenced plan submitted by Environmental Standards, Inc. on behalf of Constitution Drive Partners L.P. (“CDP”) for the former Bishop Tube site (“Site”). After review of the plan, we offer you the following comments, which we hope to discuss during our upcoming meeting:

1. Please clarify the sequence of events as reported in the plan, DEP initially reported the results of our May 2, 2017 sampling to CDP via email on June 5, 2017. The plan indicates that CDP was not notified of the pipe discharge until June 21, 2017.
2. DEP believes that CDP’s plan of filling the manhole upstream of the discharge pipe may not be best approach at this time. It may be better to leave this manhole open as a collection point where contaminated ground water can accumulate and be removed for disposal until such time that the source of the contamination can be determined and eliminated or treated and discharged under a permit.
3. The pipe in the stretch between the manhole and stream crossing should be blocked and then cleaned out using a vacuum truck to prevent any residual contamination from spreading into the soil, then it should be sealed with flowable fill to prevent future discharges.
4. Steps must be taken in the course of pipe closure activities to prevent the release of flowable fill material or other residues. We suggest performing an additional inspection of the pipe (video survey) to evaluate its integrity.
5. Please specify the type of flowable fill to be utilized. The material should be resistant to water permeation, shrinking, and cracking. The pipe at the stream embankment should be plugged with an inflatable seal prior to filling the pipe. This is to avoid pushing any residual remaining in the pipe and the flowable fill into the stream.

Mr. Gary Wolfington
& Mr. Stephan Brower

- 2 -

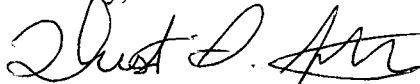
August 3, 2017

6. One week after the completion of the work it should be inspected to ensure that discharge to the stream continues to be mitigated.
7. One month after completion of the work, samples should be collected upstream and downstream from the pipe crossing to verify that discharge mitigation efforts have mitigated the discharge of inorganics to the stream.
8. The source of the water entering the piping should be identified.
9. A copy of this letter and results from the recent sediment sampling will be provided to Roux Associates for evaluation as part of the ongoing Remedial Investigation and Feasibility Study (RI/FS) work.

After the meeting, we hope that you will move forward with the steps to mitigate the discharge as soon as possible. In addition, please provide us with the schedule of activities, so that DEP can provide oversight of the activities. Within 30 days of this letter, we ask that you provide documentation to demonstrate that the work has been performed.

The analytical laboratory reports for sediment samples collected by DEP on June 22, 2017 are attached for your records. No PCBs were detected in the samples. Several inorganic constituents were detected upstream and downstream from the pipe discharge. Please forward copies of the results for the split-sampling that you performed with DEP personnel on June 22, 2017. If you have any questions, please feel free to contact me at darmstrong@pa.gov or by phone at 484.250.5723.

Sincerely,



Dustin A. Armstrong
Environmental Protection Specialist
Environmental Cleanup and Brownfields

Enclosures

cc: Mr. Nagle - East Whiteland Twp.
East Whiteland Twp. EAC
Ms. Baganski - CCEDC
Mr. Martin, P.G. - Roux Associates
Ms. McClennen
Mr. R. Patel
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