



September 5, 2017

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

Re: Bishop Tube Site

Dear Mr. Wolfington:

During an August 7, 2017 meeting with personnel representing Pennsylvania Department of Environmental Protection ("DEP"), Constitutional Drive Partners L.P. ("CDP"), and Environmental Standards, there were discussions on several topics including CDP's plan to mitigate the discharge of a pipe to Little Valley Creek, the Industrial Sites Reuse Program ("ISRP") Grant application, and the plan for the entire property.

During this meeting, you indicated that your ISRP grant application was now "dormant." Given that information, DEP plans no further review or comment on Revision 2 of the Remediation Scope of Work ("SOW") submitted by Environmental Standards, Inc. on behalf of CDP, which was received by DEP on April 26, 2017. DEP has reviewed and commented on earlier versions of this SOW dated August 16, 2016, November 18, 2016, and January 16, 2017.

DEP is expecting that the Remedial Investigation and the Feasibility Study will be completed by late fall provided Johnson Matthey Inc and Whittaker Corp ("JM/W") secure access and complete their work as they have indicated to DEP. After review of that documentation, DEP will utilize all available information to propose a remedial response action which will meet an Act 2 Standard for nonresidential use. Public Notice of the proposed action will be published in the Pennsylvania Bulletin, which initiates the opening of the Site's Administrative Record for a 90-day public comment period. The administrative record will include all of the documentation that DEP reviewed prior to proposing the remedial action. We hope to open the administrative record associated with that proposal sometime during the winter of 2017/early spring of 2018. At this time, we are requesting documentation that details all of the activities which may have impacted environmental conditions at the Site that you have performed on the property since CDP purchased the property in 2005. We need this so that we can incorporate that information, as may be necessary, into our administrative record. Specifically, your response to this request should include, but not be limited to, the following:

1. Documentation regarding the types and quantities of hazardous substances, materials containing hazardous substances, or any other material which were disposed of, stored, spilled or released into the soil, groundwater or surface water at the Site. Please use specific chemical names rather than generic terms, such as “solvents” or “liquid wastes.” Please also describe the manner and the location in which any of the above materials were disposed of, stored, spilled or released into the soil, groundwater or surface waters on the property.
2. Documentation regarding the approximate dates such hazardous substances, materials containing hazardous substances, or any other material were disposed of, stored, spilled or released on the property.
3. Documentation associated with any investigation or remediation activities performed by CDP on the property.

As used herein, the term “documents” includes, but is not limited to, writings (handwritten, typed, or otherwise produced or reproduced), any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigations, schedules, price lists, phone-records, magnetic voice or video records, tapes, summaries, magnetic tapes, recordings, disks, computer printouts, or data compilations from which information can be obtained or translated.

During the meeting, we also discussed CDP’s attainment of an Act 2 Standard considering the current zoning and CDP’s most recent proposed residential development. DEP reminded CDP of the possibility that additional remedial actions may be necessary to demonstrate attainment of an Act 2 residential standard beyond those necessary for a non-residential standard for all contaminants of concern including chlorinated solvents and metals for soils, and to address any exposure pathways on the property associated with groundwater contamination.

Please provide the requested documentation within 15 days of the date of this letter. If you have any questions, please feel free to contact me at [darmstrong@pa.gov](mailto: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. Eckert - DCED  
Mr. Brower, P.G -Environmental Standards, Inc.  
Mr. Spergel, Esq. - MGKF  
Mr. Martin, P.G. - Roux Associates  
Ms. McClennen  
Mr. R. Patel  
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