

September 8, 2017

Mr. Dustin Armstrong
Environmental Protection Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Discharge Mitigation Plan Addendum
Former Bishop Tube Facility
1 South Malin Road
Malvern, Pennsylvania

Dear Mr. Armstrong:

On behalf of Constitution Drive Partners, L.P. (CDP), Environmental Standards, Inc. (Environmental Standards) has prepared this Discharge Mitigation Plan Addendum for the former Bishop Tube facility located at 1 South Malin Road in Malvern, Pennsylvania. This discharge Mitigation Plan Addendum addresses the Pennsylvania Department of Environmental Protection's (PA DEP's) August 28, 2017 request to submit a plan to permanently mitigate the discharge of water from the leaky pipe into Little Valley Creek.

Background

In June 2017, PA DEP notified CDP that a pipe crossing Little Valley Creek, adjacent to the former Bishop Tube Facility, was leaking water into Little Valley Creek. PA DEP personnel and Environmental Standards personnel collected samples of water discharging from the pipe and sediment in the creek bed. PA DEP subsequently requested a plan for mitigating the discharge from the pipe.

Work to Date

On behalf of CDP, Environmental Standards submitted a Work Plan, dated July 19, 2017, to PA DEP to mitigate the discharge. PA DEP approved the Work Plan with some comments and recommendations. On August 24, 2017, Environmental Standards and its subcontractor (Coventry Environmental) mobilized to the project site to plug the influent and effluent lines in a manhole connected to the leaking pipe. Inflatable plugs were inserted into the influent and effluent lines and then inflated to the recommended pressure.

Environmental Standards performed three subsequent site visits to evaluate if the water leaking from the pipe had been mitigated. During the follow-up visits, it was visually observed that water was still leaking from the pipe, but at a reduced rate. Observations of the manhole adjacent to the stream indicated that a minor amount (less than three-inches in the center trough) of water had accumulated. Observations of the manhole by the former drum storage area did not indicate any changes from observations prior to plugging the manhole.

Discharge Mitigation Plan Addendum

Based on site reconnaissance, it appears that the only way to stop water from entering Little Valley Creek from the leaking sewer line is to sever and plug the leaking pipe on the Bishop Tube side of the creek. Environmental Standards has developed the following amended approach to eliminate the discharge from the leaking pipe.

1. Remove an approximate 2-foot section of pipe on the Bishop Tube side of Little Valley Creek. The pipe section will be removed as close to the bank as possible.
2. Use a flashlight to determine if there is an obstruction in the pipe, both toward the manhole and across Little Valley Creek.
3. Take photographs to document observations.
4. Manually insert plastic sheeting or other suitable material into the pipe to act as a stop gap to prevent flowable fill from flowing up the pipe.
5. Use flowable fill to create a plug in the Bishop Tube side of the pipe. The plug will be approximately 1-foot in length.
6. Cap the pipe to ensure the flowable fill remains in place.
7. Cap the open end of the remaining pipe that crosses Little Valley Creek.
8. Periodically check the plugged pipe to verify that the flow has been stopped.

Should you have any questions regarding this submittal, please do not hesitate to contact me at 610-935-5577, extension 512.

Sincerely,



Stephen D. Brower, P.G.
Director of Geosciences/Principal

SDB:cg

Copy to: Mr. Guy Wolfington – CDP (electronic copy)
Mr. Jerry O'Connor – CDP (electronic copy)
Mr. Jonathan Spergel – Manko, Gold, Katcher & Fox, LLP (electronic copy)
Ms. Kate Baganski – Chester County Economic Development Council
East Whiteland Township – Township Manager