



September 8, 2017

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

Re: Bishop Tube Site  
Response to DEP's August 28, 2017 Letter Regarding  
Pipe Discharge Mitigation Plan

Dear Mr. Armstrong:

On behalf of the Bishop Tube Project Team ("BT Team"), Roux Associates, Inc. ("Roux Associates") has prepared this letter in response to the Pennsylvania Department of Environmental Protection's ("DEP") August 28, 2017 letter requesting that the BT Team investigate the extent and location of the leaking pipe over Little Valley Creek ("LVC") throughout the former Bishop Tube site (the "Site").

As summarized in DEP's letter, initial pipe discharge mitigation activities were conducted on August 24, 2017 by the property owner, Constitution Drive Partners, L.P. ("CDP"). These activities were intended to completely seal the identified sewer pipe and prevent the aqueous discharge from the pipe to LVC. Based on the information in DEP's August 28, 2017 letter, supplemental mitigation activities are now necessary to completely eliminate the aqueous discharge. Once the aqueous discharge is successfully mitigated, there will no longer be a discharge to LVC. However, the source of water and flow of water through the facility sewer infrastructure has still not been assessed based on the information currently available.

In the August 28, 2017 letter, DEP states that the BT Team "should investigate the extent and location of pipe throughout the property." This suggestion is a significant deviation from any approved remedial investigation scope of work conducted at the Site. The BT Team respectfully declines to embark on an investigation of facility infrastructure owned by others, especially when a) the observed aqueous flows were entirely within the piped/manhole infrastructure, and b) in prior letters, DEP has directed CDP to assess its sewers and determine the source of aqueous flow within those sewers. We await the results of those investigations conducted by others.

At present the BT Team remains focused on securing access agreements to allow completion of the DEP-approved drilling scope-of-work. As previously communicated to DEP, the continued identification of potential supplemental activities will necessarily extend the timeframe for completion of the Remedial Investigation ("RI"). Further,

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submission of the Feasibility Study ("FS") Report is contingent upon DEP approval that the RI is complete.

Should you have any questions or comments, 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 - E-mail  
Bonnie McClennen - PADEP - E-mail  
Bishop Tube Project Team - E-mail