

May 31, 2016

Mr. Robert M. Talley
President-Corporate, General Counsel,
and Secretary
Johnson Matthey
435 Devon Park Drive, Suite 600
Wayne, PA 19087-1998

Mr. Eric G. Lardiere Vice President, Secretary, and General Counsel Whittaker Corporation 1955 North Surveyor Avenue Simi Valley, CA 93063

Re: Bishop Tube Site Feasibility Study

Dear Mr. Talley and Mr. Lardiere:

As a follow-up to our April 8, 2016, meeting with representatives of Johnson Matthey and Whittaker Corporation (Project Team) and findings outlined in the Treatability Study Report dated October 29, 2015, discussed at the meeting, the Department of Environmental Protection (DEP) is requesting preparation of a Feasibility Study (FS) for the Bishop Tube HSCA Site (Site) in accordance with Section 5(f) of the Amended Consent Order and Agreement dated August 4, 2009.

The FS should utilize the existing data accumulated by your experienced consultants and DEP's investigation activities. It should be prepared in accordance with the most recent U.S. Environmental Protection Agency guidance and evaluate potential remedial measures to address contaminant source areas within the unconsolidated overburden and bedrock zones beneath the Site and the resulting downgradient contaminant plume.

The following remedial action objectives should be considered in the FS preparation:

- 1. Eliminate current open exposure pathways.
- 2. Eliminate potential/future exposure pathways.
- 3. Remove contaminant mass and reduce mass discharge from contaminant source areas.
- 4. Reduce diffuse discharge of Site contaminants to Little Valley Creek.
- 5. Reduce the size and life-span of the contaminant plume.

In order to meet these objectives, the FS should, using the data gathered by both the Project Team and DEP, address the following environmental media:

- 1. On-site unsaturated soils, which may contribute to groundwater contamination and potentially serve as a vapor intrusion and/or direct contact risk.
- 2. On-site and off-site saturated soil, bedrock, and nonaqueous phase liquids, contaminated as a result of releases at the Site, which serve as a source of groundwater contamination.

3. On-site and off-site groundwater contamination resulting from the Site, which may pose a current and/or future exposure risk through vapor intrusion and/or consumption.

DEP is preparing a response to the May 13, 2016, submission by Roux Associates, which addressed our December 31, 2015, comments on the Remedial Investigation (RI) and Treatability Study (TS) Reports. We are confident that remaining questions concerning the RI can be resolved. Resolutions of these questions should not delay initiation of the FS work. DEP is also aware that the current property owner, Constitution Drive Partners (CDP), intends to facilitate certain actions to address near-surface source areas at the Site, and we highly recommend coordinating any proposed remedial options with CDP's plans. In light of the proposed use of the Site, we request an expedited timeframe for completing the FS.

Within thirty days, please provide DEP with a timeline for completing the FS and a list of screening-level remedial options to address the environmental medial listed above. We continue to expect that none of the proposed actions will adversely affect the soil and groundwater contamination. Please consider all of the data available as a result of your activities which began in 2009, as well as previous DEP investigation activities.

If you have any questions, please feel free to contact Mr. Dustin A. Armstrong by e-mail at darmstrong@pa.gov or by telephone at 484,250.5723.

Sincerely,

Ragesh Patel

Environmental Group Manager

HSCA Section

Environmental Cleanup and Brownfields

cc:

Mr. Armstrong

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Ms. Pohlman, P.E., Chair - East Whiteland EAC

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