

NOV 15 2021

Dustin Armstrong

DEP Southeast Region Off.

2. E. Main St., Norristown, PA 19401

Nov. 8, 2021

RE: Bishop Tube, Chester County PA

Comments re: the proposed Site remediation

While the village sleeps, Toxins continue to creep into the air, the soil, the groundwater, the streams, and the drinking water.

Villagers continue to die of cancer and children continue to suffer brain tumors and die.

Bishop Tube operated from 1950 till 1999. During that time it was cited for violations several times. It seems that unlike Chem Clean, just down the road from Bishop Tube, no action was taken, unless violations which produced no change for the better.

And while I appreciate the efforts of Dustin and PADEP to come up with a long overdue remediation plan, several important issues have been ignored>

1. A topographical map with latitude and longitude, locations and depths of samples collected and a useful determination of this data to aid in the determination of both the vertical and horizontal path of the contamination.
2. A determination of the extent in order to determine the Site.
3. To determine the migration path and extent of the contamination.
4. Very important is the absence of past, present or proposed testing in every capacity and every media for perfluorinated carboxylic acids (PFAS) commonly used in metallurgical processes since the 1930s. These chemicals are soluble, are in our air, streams, groundwater and in our bodies. As opposed to TCE which is a DNAPL. Insoluble in water sinking to undetermined depths, semi volatile: with thermal treatment emits toxic gasses. Care needs to be taken in the chemicals used to OXY/REDUX for fear of converting to a form of PFAS due to incomplete reaction. Not cost effective.
5. PFAS are carcinogen's, endocrine disrupters, cause gastrointestinal disorders, reproduction issues, low birth rates and on, and on.

The contaminated drinking water well on Conestoga Road should be used to monitor depth of the TCE and migration.

A true hydro-geological study of the area is necessary. Much of the Valley is Karst and sandstone permitting contaminants to continue migration. Failure to do a hydrogeological assessment may be why the sparging failed. The topography of Bishop Tube is different from that of the Chem Clean Site. And we do not know how well that is working.

Previously the composition of the 13.5 acres was considered basalt but after reviewing recent studies it appears to be gneiss which better fits the media of a previous shallow sea. In the case of PFAS which are

surfactants and used in hydraulic drilling, it's likely that they have increased the migration of the TCE through fractures in the gneiss allowing greater contamination of the stream which is a High Quality Stream and flows into Valley Creek. A Movable Feast.

In conclusion: In order to make a sound decision on remediation, you must first develop sound evidence and the data to support PADEP's decision. Meanwhile the Village continues to suffer.



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