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**Via Electronic & First Class Mail**

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PROGRAM ECB / HSCA  
FAC NAME Bishop Tube Co.  
COUNTY 15  
MUNICIPALITY 925  
FILE ID # 638317  
FILE TYPE # 664

**Re: Bishop Tube HSCA Site**

Dear Andy,

On behalf of Johnson Matthey, Inc. ("Johnson Matthey") and Whittaker Corporation ("Whittaker"), please accept this response to your letter dated September 25, 2012 in which the Pennsylvania Department of Environmental Protection ("DEP" or "Department") requested that Johnson Matthey and Whittaker further implement the September 2007 Statement of Decision ("SOD"), which was provided to us at the September 19, 2012 in-person meeting with the Department.

In the interest of avoiding a potential enforcement action or lifting the stay on the currently pending litigation in United States District Court for the Eastern District of Pennsylvania, Johnson Matthey and Whittaker are willing to conduct a treatability study within the overburden in Building 8 on the Bishop Tube Site (the "Site") as part of the ongoing Remedial Investigation to evaluate whether the previously performed enhanced reductive dechlorination bench-scale microcosm study might be feasibly applied in the field.

By way of background, at the request of the Department, the Bishop Tube Project Team completed a bench-scale microcosm study on samples of soil and groundwater collected from the Site. The microcosm study results demonstrated that anaerobic degradation, both naturally occurring and through the addition of substrates and bio-augmentation, took place within the soil and groundwater samples in a laboratory setting. We concluded from this that anaerobic reductive dechlorination may be a favorable remedial option for the Site. However, as the Department agreed during our meeting on September 19<sup>th</sup>, findings from a controlled laboratory study do not necessarily translate to the natural environment. Accordingly, a treatability study

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within the unconsolidated "source area" beneath Building 8 (i.e., the area to be addressed, as defined in the SOD) is necessary.

As you noted in your September 25<sup>th</sup> letter, the general steps required to complete a field treatability study include development of conceptual engineering design, preparation of a work plan for Department approval, installation of monitoring/injection points, collection of pre-treatment (baseline) data, injection of substrates (and bio-augmentation, if/as warranted), and monitoring of performance and reporting of results. With these steps in mind, we anticipate that treatability study results could be available in approximately 8 months (2 months for design/approvals and 6 months for implementation) from initiation. The study would be monitored as it proceeds. Any supplemental substrate additions, bio-augmentation, or other changes made to enhance final outcome could affect the schedule.

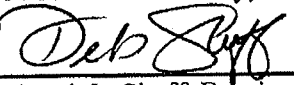
If directed by the Department to proceed with a treatability field-scale study for the Building 8 area as defined in the SOD, our technical consultant has advised us that it can provide a schedule and a work plan within 30 and 60 days, respectively.

Like you, we are interested in continuing the successful public/private partnership that the Bishop Tube Project Team and the Department have built over the years. Should you have any questions or comments, please do not hesitate to contact the undersigned.

**For Whittaker Corporation**

  
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cc: The Bishop Tube Project Team (Via Electronic Mail Only)