

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Hazardous Sites Cleanup Program
RESPONSE TO PUBLIC COMMENTS
Bishop Tube Site
September 5, 2007

The Department provided a public comment period concerning the selection of the prompt interim response at the Bishop Tube Site. Notice of this response action was published in the *Pennsylvania Bulletin* on December 16, 2006. Written comments were accepted during the comment period which extended from December 16, 2006 to March 16, 2007 and oral comments were presented at a public hearing conducted on January 30, 2007 at the East Whiteland Township Building. The Department has compiled all comments, criticisms, and new data received during the comment period and at the public hearing, from the following persons.

Oral Comments:

1. Ms. Angela Bohn, 64 Malin Road, Malvern, PA 19355
2. Ms. Sharon Connor, 95 Village Way, Malvern, PA 19355
3. Mr. Keith Hartman, 53 Village Way, Malvern, PA 19355
4. Mr. Kenneth Leasa, 54 Conestoga Road, Malvern, PA 19355
5. Mr. John Mott, 276 Swedesford Road, Malvern, PA 19355
6. Michael Picarella, Tioga Pike Road, Exton, PA 19341
7. Mr. Brough Richey, 1 Lapp Road, Malvern, PA 19355
8. Mr. Mark Tillman, 8 Winding Way, Malvern, PA 19355

Written Comments

9. Angela and Larry Bohn, 64 Malin Road, Malvern, PA 19355 (via email dated March 15, 2007)
10. Delores Kash, 6 Birch Rd., Malvern, PA 19355 (via email dated February 1, 2007)
11. Robert W. Thomson, Babst, Calland, Clements, Zomnir, 2 Gateway Center, Pittsburgh, PA 15222 (via letter dated March 16, 2007)

Each comment, the source or sources of the comment identified by number (in parenthesis), and the Department's response are listed below.

Oral Comments:

Comment #1

What is the impact on the health of people living in the neighborhood surrounding where you will be doing the cleanup? (1)

Response:

The Department will be monitoring emissions from the treatment system to assure that cleanup activities will not adversely affect the community. Over the long-term, remediation of the source area will reduce the release of hazardous substances to the surface water and air.

Comment #2

Also, when you are doing the cleanup, will you sample the soil in homes that have, not only wells, but have public sewer and public water? (1)

Response:

The Department is currently formulating plans for assessing potential vapor migration from contaminated areas associated with the site to indoor air. This may include sampling of soil vapor and/or indoor air in and around certain homes near the site. Work performed thus-far to evaluate this pathway (including sampling between the Bishop Tube property and the nearest residences) does not raise significant concerns.

Comment #3

How will you let us know what you're doing? What will be the information, how will we get information? (1)

Response:

The Department will be scheduling future hearings and informational sessions to keep the community informed. We will also be providing information to the Township through its Environmental Advisory Council (EAC). We anticipate that the EAC will occasionally request our attendance at their regular meetings.

Information is also available in the Department's regional files, located in our Norristown office.

Comment #4

If when you start doing this, you find that your well isn't doing everything it's supposed to do, and it is letting the toxic vapors into the air, how will we know about that? (1)

Response:

The system is designed to automatically shut-down if certain components are not operating properly. The contaminant concentrations and volumes of vapors being treated by this system are not expected to pose a risk to the community. If the treatment system is not functioning properly, the Department will take steps to correct the problem and/or shut the system down.

Comment #5

Will you be addressing the cancer deaths that we heard about to see if they had a relation to the contamination here, and if so, how will we find out about that? (1)

Response:

The Department has sought the assistance of the Agency for Toxic Substances and Disease Registry (ATSDR) This federal agency, part of the Centers for Disease Control, has the expertise and resources to investigate the relationship between environmental contamination and incidences of disease including cancer. ATSDR will be reporting back to the community and the Department.

Comment #6

My concern is how soon would you check our properties? They never came out and actually did anything on my property or my neighbors', and I'm concerned because I know my house included, and all up around that corner, there's been at least one person in each household that had died of cancer within the last, I'd say, five, ten years. So I do have a health issue and concern about this, you know, all these chemicals that have been released in the air. (2)

Response:

As mentioned in the response to Ms. Bohn, the Department is planning to evaluate potential affects on indoor air associated with the site.

Comment #7

When I was growing up we couldn't -- at night, they would release this -- it looked like black soot in air. It would get all over your clothes --- if you had clothes out. The cars, if you didn't take it off, it would eat the paint on your cars. So I'm just very concerned about that. Health issues concerning the whole development, especially down at our end. And we've been --- I was evacuated at least two or three times. And the fumes were bad at night, but they would wait late at night while people were sleeping, and that's when they would really release it into the air. (2)

Response:

These conditions were associated with the operations of the Bishop Tube Company. Operations which resulted in the release of hazardous substances to the soil and groundwater currently being addressed by this response action.

Comment #8

The kids in the neighborhood use this Bishop Tube site as a hangout. So is there any postings that are going to go up, or will it be watched so that the kids [stay out], since this is hazardous? The fence has been knocked down, that used to keep them from going in there. They ride big wheels, skateboards and hang out over there. Something needs to be done to keep the kids out. (2)

Response:

The Department is aware and shares your concern about the trespassing problem at the site. You are encouraged to report instances of trespassing to the Township police. The Department has advised the property owner and the Township of these concerns.

Comment #9

I worked at Bishop Tube for 16 years. My father had 42 years there. My concern is that we at least go out and investigate—(Mr. Hartman asked us to project a slide from Mr. Armstrong's presentation showing an aerial view of the site and referred to the eastern side of the Plant #8 Building.)—The contamination that I'm referring to is right back here on the back end of the plant. That's where the cesspools were for these metals, and salts, and acid and what all have you. (3)

Response:

This comment does not pertain to the on-going response action. However, the Department continues to investigate the site to determine what additional response actions are required. The involvement of former employees like Mr. Hartman is critical to this task.

Comment #10

My only concern is not only with this site (Mr. Hartman referenced a property east of the site on a map of the site area.) Right here is the junkyard. They've since built a body shop right next door to it. That was owned by the Gray family. That junkyard is still owned by the Gray family...is where those lagoons were that the trichloroethylene and the salts from this pickling process were dumped in there.... If there's something there that runs under the railroad track, and it goes right down into that property, that needs to be addressed. And somebody should be out there putting a well in at the back of that junkyard to find out what's going on with this. (3)

Response:

Thank you for this information, there are a number of potential sources of regional groundwater contamination in the vicinity of the Bishop Tube site. The Department will follow-up on this site in due course.

Comment #11

A fellow by the name of Dave Worst was president of our union at the time I was there. We have information, printed information, on who the owners of the

company were, but good luck finding them, because they're from Italy. We'll help you in any way we can. (3)

Response:

As mentioned above, the Department continues to investigate the site including companies involved in its operation.

Comment #12

In response to a comment raised about heavy soot emissions from the former Bishop Tube facility, Mr. Hartman commented – I'd just like to comment on what you said about the soot. The soot that was belched out of Bishop's was --- early on, that was from the heating systems that we used to burn bunker oil, and you know, really heavy oils. And then we switched oils, and that stuff stopped, and it ceased doing it. We could only --- when we did the changeover, we could only blow the stacks, so to speak, at a certain time and period, but that went away because we changed fuels. (3)

Response:

Clarification noted. Thank you.

Comment #13

I do think we ought to make it clear though, to the audience here, that there's no additional contamination whatsoever being generated by that site. It's what's leaching out from the site. There's no manufacturing, there's nothing in there that's stored, to the best of my knowledge. I would hope that they would move the oil tanks for the --- when I was last in the plant they pretty much dug where the degreaser was. They excavated that all out, and filled it with stone and cement. Same way with the pickling area, that's all been removed. I just don't know if they actually dug up the fuel tanks. (3)

Response:

The Department is aware of at least one fuel tank. There is no indication from our investigation that a release has occurred from that tank. The Department is not authorized to address releases of petroleum under the Hazardous Sites Cleanup Act.

Comment #14

I'm a resident for 60 years. I would like to relate this little tale from family experience. Back in the '60's, my father-in-law then had the Brachbill Hotel. And that's across Rt. 30, on the north side, from Bishop Tube. My daughter and her first cousin tell that one day they were swimming in the Brachbill pond and they noticed some blue water coming through the culvert underneath the highway. These children followed the blue water, crawling underneath the highway, and they went up and they got to the margins of the Bishop Tube, and of course the stuff was coming from there. Her recollections today is that they were told about this contamination, but nothing at all was done about it. (4)

Response:

The Department has received many reports of releases from the former Bishop Tube facility. Thus far our investigation has revealed that trichloroethylene is the most significant contaminant of concern associated with the site. However, we continue to follow-up on additional potential source areas and chemicals of concern at the site.

Comment #15

I'm going to try to combine a couple of the comments that came up in the question and answer. I understand this is accelerating this portion of the cleanup, because we have an interested developer, which is fine. And the sooner you get the source out, the better it's going to be for everybody. I do want to stress though that I think we need to make sure that this is the best cleanup approach --- that we're not making allowances to the developer by not tearing the buildings down, and going with some method that may not be the best way of doing it. So I just want to make sure that the DEP is convinced that the way they're going is the best technology for cleaning this site. (5)

Response:

The Department believes that treatment of contaminated soils (saturated and unsaturated) in place will significantly reduce the quantity or mass of trichloroethylene and related compounds. We also believe that sufficient flexibility has been incorporated into the remedy to mitigate the ongoing release of contaminants to groundwater even if air sparging and soil vapor extraction fails to do so.

Comment #16

I used to reside at 66 Malin Road for ten or eleven years with my family. We since moved to Tioga Pike Road, in Exton. I just want to put on the record that if this contamination does go back, apparently, from what we're hearing, to the late '70s, early '80s, what action maybe should have been taken by the Township to notify the people in the area that this plant was contaminated? Because, obviously, this is the first a lot of us are hearing about it, and it's now 2007. (6)

Response:

This comment should be directed to the Township. The Department's record contain historical information regarding this site, and are available for public review at our Norristown office, during regular business hours.

Comment #17

Why is this site being remediated through DEP? And why was it not classified as an EPA supervised site? (7)

Response:

Questions regarding EPA's involvement should be directed to EPA.. Initially this site was being investigated voluntarily by the then property owner and former operator Christiana Metals under Department oversight. Immediately after voluntary actions ceased, the Department initiated further investigations under HSCA.

Comment #18

I guess my main concern would be Little Valley Creek does run across my property. So I am concerned about what is being – what groundwater is being released into the creek? What metals and contamination are in there? I've been living here for 33 years, and we used to play in it as kids. So I am concerned about my kids playing in and around the creek. (8)

Response:

Information regarding stream sampling is included in the Administrative Record, which is available for review at the Township Building or in the Department's Norristown Regional Office. The Department intends to perform more investigative work to evaluate potential site impacts to Little Valley Creek. This may include human health and ecological risk assessment work.

Written Comments

Comment #19

When will the cleanup begin? (9)

Response:

As noted at the hearing and in the Analysis of Alternatives preliminary construction work to install the system was initiated during the comment period. Completion of the system's construction was delayed due to heavy rain events in the spring. System operation is expected to begin by September 2007.

Comment #20

We want to be notified at our above address when clean up begins. (9)

Response:

There are no current plans to individually notify residents when clean up work begins, but again, system construction is underway and operation is expected to begin by September 2007. However, as mentioned in the response to comment #3 the Department plans to update the Township Environmental Advisory Council regularly at its meetings. Future public hearings and information sessions will also be scheduled.

Comment #21

Will the safest and best methods be used in the cleanup so humans will not have their health impacted negatively? (9)

Response:

Recovered vapors will be treated using a catalytic oxidizer to destroy target contaminants including trichloroethylene before release into the atmosphere.

Comment #22

How long will it take to complete? (9)

Response:

The Department intends remove the maximum amount of contamination from the soil and shallow groundwater with the system. Determining when the system is shut-down for each of the three areas will be based on removal rates rather than on a pre-established end date. Currently it is estimated that the system may be operated for a period of two to three years.

Comment #23

Can it be completely cleaned up? (9)

Response:

This response action is intended to remove chlorinated solvents such as trichloroethylene from the soil and shallow groundwater in the three defined source areas, where soil contamination exceeds state cleanup standards. Removing and destroying these contaminants at their source helps to prevent them from migrating off-site in groundwater. Also, see the Department's response to Comment #25.

Comment #24

We want to be notified when it is completed. (9)

Response:

There are no current plans to individually notify residents when clean up work is completed, but we expect work for this phase to take several years. We plan to keep the community updated through the EAC, public information sessions, and public hearings.

Comment #25

Is the goal to completely remove toxins from environment? (9)

Response:

Ultimately that is our goal. However, this response action only addresses sources of contamination in soil and shallow groundwater. The Department anticipates that further cleanup will be required to address contamination at deeper intervals and in the larger groundwater plume. To date no technology has been developed to achieve complete removal of contamination from the groundwater media.

Comment #26

What is the acceptable amount of toxins that will not do harm to humans? (9)

Response:

It depends on the contaminant, at what level and for how long an individual was directly exposed. You may want to refer to the Agency for Toxic Substances and Disease Registry website - <http://www.atsdr.cdc.gov/>, contacting that agency for further information.

Comment #27

What is the address of the home with the contaminated well of Rt. 401? (9)

Response:

Out of consideration to the privacy of the individuals involved, the Department is not providing this information in this comment response document.

Comment #28

What impact will these toxins have on the Wegman's Supermarket that is being built over the Worthington Steel site? (9)

Response:

The Department has not evaluated the former Worthington Steel property with respect to contamination from the Bishop Tube site. Documented releases of hazardous substances had occurred at Worthington Steel. The property owner of the former Worthington Steel site has achieved a standard under the Commonwealth's Land Recycling and Environmental Remediation Standards Act. The approved post remedial care plan requires evaluation of exposure pathways (i.e. vapor intrusion) as part of the property development.

Comment #29

What impact does the contamination have on the restaurants immediately North of the site? (9)

Response:

The Department plans to evaluate off-site exposure pathways as site investigation work continues.

Comment #30

We would like the soil and air quality on our property tested by you and we want the results. (9)

Response:

The Department is developing a plan for systematically evaluating off-site exposure pathways related to the site. This will likely include collection of samples from private properties in the area. If the Department determines that samples from your property are required as part of this evaluation, you will be contacted. If samples are collected at your property, results will be provided to you.

Comment #31

Why weren't we notified when the company first learned that it was contaminating the environment? (9)

Response:

Upon receiving information about contamination at the site the Department initiated enforcement and response actions. The Department's files are open for public review.

Comment #32

What role does the DEP and the companies involved have regarding the cases of cancer in this area? (9)

Response:

The Department has sought the assistance of the Agency for Toxic Substances and Disease Registry (ATSDR) This federal agency, part of the Centers for Disease Control, has the expertise and resources to investigate the relationship between environmental contamination and incidences of disease including cancer.

Comment #33

How long did the East Whiteland Township, Great Valley School District and the County of Chester know about the contamination, and what actions are they going to take to test our property for the contamination? (10)

Response:

Any question regarding East Whiteland Township, Chester County or Great Valley School District should be directed to those entities.

Comment #34

If CCIDA asked back in 1999 for forgiveness of taxes, why weren't residents notified? (10)

Response:

Questions regarding CCIDA should be directed to them.

Comment #35

The complete letter is attached and incorporated into this response. (11)

Response:

By incorporating the letter into this response document it is part of the Administrative Record for the response action. The Department has not identified Marcegaglia as a "responsible party" at the site. Rather, the Department considers Marcegaglia to be "potentially responsible" under the provisions of HSCA pertaining to site operators.

Armstrong, Dustin

From: [REDACTED]
Sent: Thursday, March 15, 2007 7:20 PM
To: darmstrong@state.pa.us
Subject: Bishop Tube Site

Comments in Response to Public Meeting held on 1/30/2007 in East Whiteland Township from: Angela and Larry Bohn

[REDACTED] Road
Malvern, PA 19355
East Whiteland Township

When will clean up begin? We want to be notified at our above address when clean up begins. Will the safest and best methods be used in the cleanup so humans will not have their health impacted negatively? How long will it take to complete? Can it be completely cleaned up? We want to be notified when it is completed. Is the goal to completely remove toxins from environment? What is the acceptable amount of toxins that will not do harm to humans? What is the address of the home with the contaminated well on Rt. 401? What is the address of the home that wanted to put in the well but decided against it? What impact will these toxins have on the Wegman's Supermarket that is being built over the Worthington Steel site? What impact does the contamination have on the restaurants immediately North of the site? We would like the soil and air quality on our property tested by you and we want the results. Why weren't we notified when the company first learned that it was contaminating the environment? What role does the DEP and the companies involved have regarding the cases of cancer in this area? Thank you.

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Armstrong, Dustin

From: [REDACTED]
Sent: Thursday, February 01, 2007 9:47 AM
To: darmstrong@state.pa.us

Per our Hearing meeting on January 30 of 2007, I Delores Kash at [REDACTED] Malvern, Pa 19355 tele # [REDACTED] Would like to know how long did the East Whiteland Township, Great Valley School District and The County of Chester new about the contamination?, and what actions our they going to take to test our property for the levels contamination? If CCIDA asked backed in 1999 for forgiveness of taxes, why weren't residents notified.

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March 16, 2007

VIA FACSIMILE (484) 250-5961

Dustin A. Armstrong
Project Officer
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Re: Bishop Tube Site
Notice of Prompt Interim Response

Dear Mr. Armstrong:

This is a comment for the Administrative Record on the Proposed Interim Response for the above-captioned site. In your letter enclosing Public Notice of the proposed action, you stated that you were sending it to "known responsible persons and holders of liens against the subject property." Marcegaglia is neither a responsible person nor a lien holder.

The history of the involvement of Marcegaglia at the site is as follows. In 1991, Christiana Metals Corporation, a creditor of Bishop Tube Division of Electralloy Corporation, was awarded the debtor's personal property located at the Frazer, Pennsylvania facility owned by Christiana. At the time of sale, the facility at the Frazer site had been shut down since 1987.

Marcegaglia S.p.A. entered into an agreement with Christiana to purchase machinery and equipment owned by Christiana. Marcegaglia S.p.A. formed a new corporation, the New Bishop Tube Company, effective January 1, 1992, to which the Christiana machinery and equipment was transferred. The new corporation leased the Frazer facility from Christiana and began operation in the third quarter of 1992. Later the name of the corporation was changed to Damascus-Bishop Tube Company, and still later to Marcegaglia USA, Inc.

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Dustin A. Armstrong
Pennsylvania Department of Environmental Protection
March 16, 2007
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The business operated on the Frazer site was completely different from and unrelated to the business that had been operated by the Bishop Tube Division (sometimes called "Bishop Tube Company") of Electralloy Corporation. Of the equipment purchased, the four largest mills were useful to Marcegaglia, which sent people from Italy to modify them for its business. Other equipment, such as the cold draw equipment, was scrapped and pickling and degreasing pits covered. Marcegaglia did no pickling or degreasing and used no TCE.

The records we have reviewed in the Department's files show that the Department was aware of contamination from the site since at least 1972. The reports from monitoring wells and work plans submitted to the Department before Marcegaglia was on site show TCE contamination deep under the site. The records show that TCE came from the historic degreasing operations. It is obvious Marcegaglia could not have caused or contributed to the releases at the site.

Please remove Marcegaglia from the list of responsible parties at the site.

If you have any questions, please give me a call.

Very truly yours,



Robert W. Thomson

RWT/dmt

cc: David Cornelius
Ferdinando Saglio
Colleen G. Donofrio, Esq.