



DIVERSIFIED ENTERPRISES, INC.

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November 5, 2012

Mr. Kevin Walker and Mr. Thomas Thompson
The Pennsylvania Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18701-19153

RE: Bethlehem Municipal Garage
540 Stefko Boulevard
Bethlehem, PA 18017
PADEP FACILITY ID #48-19594
PAUSTIF CLAIM #99-0083(F)

Dear Mr. Walker and Mr. Thompson:

B&B Diversified Enterprises (B&B), Inc. is working with the City of Bethlehem, ICF International (ICF), and Underground Storage Tank Indemnification Fund (USTIF) on the above referenced project. B&B was brought in by USTIF to aid the City of Bethlehem in moving the case forward. The additional efforts needed to complete the characterization for this Site will be completed by a new consultant to be selected by the City of Bethlehem. In an effort to continue moving forward on the project, we would like to obtain the PADEP's approval on the proposed scope of work prior to the selected consultant completing the investigation. In addition, B&B would like to formally request a Site Characterization Report (SCR) extension until a new consultant can be selected and an appropriate characterization investigation can be completed. B&B respectfully requests a revised SCR deadline of June 14, 2013.

B&B, ICF, and the City of Bethlehem have reviewed the PADEP's most recent correspondence dated August 14, 2008 and would like to move forward with completing the characterization of the Site. A copy of the aforementioned PADEP correspondence is attached for your reference. In the PADEP correspondence dated August 14, 2008, the PADEP denied approval of the SCR Addendum dated May 29, 2008 and cited the following:

- "Consistent with the Pennsylvania Code Title 25 § 245.309, Subparagraph 4, the groundwater characterization must determine the regulated substances involved, and the extent of migration of those regulated substances in groundwater. Based on the Department's review of the report, the one comprehensive groundwater sampling event conducted on March 3, 2008 on monitoring wells MW-1 through 3 is not adequate in defining the extent of contamination at the site. In order to confirm the initial rounds of groundwater sampling and to determine if additional monitoring wells are needed, an additional round of sampling is

warranted. This additional round will provide data to determine if the compound detected in the blank collected from monitoring well MGMW-3 is representative of the aquifer or is something encountered during sampling/laboratory analysis. “

- “The Department recommends that any additional groundwater sampling at the site include the parameters on the revised short list (effective March 15, 2008) for petroleum products for unleaded gasoline, specifically, 1,2,4- and 1,3,5-trimethylbenzene. “
- “Provide more information on the monitoring well construction differences between MW-2, MW-3 and MW-1. The Department’s review of the geologic cross sections indicate that monitoring well MW-1 may not be monitoring the same intervals/fractures as monitoring wells MW-2 and MW-3. The aquifer test indicates that there wasn’t any influence in MW-2 and MW-3 when pumping from MW-1.”

The above described PADEP suggestions were taken into consideration while developing this work plan and as such, the following activities are being proposed:

1. **Soil boring investigation –**

In an effort to delineate the soil at the Site, a soil boring investigation is being proposed at the Site. As part of the investigation, the selected consultant will advance a total of seven (7) soil borings at the Site. Soil borings will be advanced to groundwater, bedrock, or refusal, whichever is encountered first. However, in the event that there is no evidence of petroleum hydrocarbon impact (includes olfactory, visual, and field instrument detections) for more than 25 feet, then the boring maybe terminated. Soil samples will be collected continuously in five (5) foot intervals and will be logged by an on-site geologist for soil classification and structure, odor, soil moisture, soil texture, color, and screened with a photoionization detector (PID).

With regards to soil borings SB-1 through SB-7, soils exhibiting the highest PID reading in each borehole will be collected for submittal to a laboratory for analysis. An additional soil sample will be collected at the bedrock interface or just above groundwater in an effort to delineate the soil sample with the highest PID reading. If a boring exhibits no PID readings, a soil sample will be collected from approximately five (5) to six (6) feet below surface grade of the boring and then again at the base or refusal.

A total of 14 soil samples are proposed to be collected both in laboratory-sterilized sample jars and using an appropriate sampling method. The samples will then be placed on ice and delivered to an accredited laboratory for chemical analysis. Soil samples will be collected and analyzed for the PADEP unleaded gasoline short list (benzene, toluene, ethylbenzene, total xylenes, MTBE, naphthalene, isopropylbenzene, 1,3,5-trimethylbenzene, and 1,2,4-

trimethylbenzene). The analytical data, field results; boring logs, and sampling map from the event will be summarized and included in a SCR.

The approximate locations of the seven (7) soil borings (SB-1 through SB-7) are provided on the attached figure for your review. Please note that the proposed boring locations may need to be moved due to health and safety concerns, obstructions, and/or the presence of subsurface utilities at the Site. Prior to the advancement of the soil borings, the selected consultant will be required to complete a private markout at the Site to identify the location of obstructions and underground utilities. If due to valid concerns the general locations of the proposed borings need to be altered more than eight (8) feet from the approximate locations provided on the attached figure, then the selected consultant will be required to contact the PADEP, discuss the need for the changes, and provide the PADEP with a revised soil boring location map.

2. Fracture Trace Analysis and Geophysical Investigation –

In an effort to collect sufficient data to confirm and/or position the bedrock monitoring wells in appropriate locations, the selected consultant will complete a fracture trace analysis as well as a geophysical investigation. A Professional Geologist will attempt the fracture trace analysis; however, there are concerns that the development of the site and surrounding properties may prohibit the collection of sufficient defensible data. As such, a geophysical investigation that includes electrical resistivity imaging and seismic refraction will be completed. The fracture trace analysis and geophysical investigation will be completed prior to the installation of the additional bedrock monitoring wells. The Professional Geologist will utilize the information from the analysis and investigation as well as actual site conditions to determine the locations of the five (5) proposed bedrock monitoring wells. The SCR will discuss the efforts completed and provide the locations in which the bedrock monitoring wells were installed.

3. Monitoring well installation activities –

- **Installation of overburden/weathered rock monitoring wells –**

A total of three (3) monitoring wells (MW-4, MW-5, and MW-6) are proposed for installation to investigate whether a shallow water bearing zone is present in the overburden/weathered rock at the Site. Drilling will be conducted under the supervision of a Pennsylvania-licensed Professional Geologist and the construction specifications will be determined by the Professional Geologist and dictated by actual site conditions (i.e. actual depth to competent bedrock, actual depth to groundwater, etc.).

The wells will be drilled and constructed in accordance with generally accepted practices as outlined in the PADEP Groundwater Monitoring Guidance Manual, dated January 1, 1999 (Document # 383-3000-001). The overburden/weathered rock monitoring wells will be constructed using schedule 40 PVC flush threaded casing and schedule 40 PVC flush threaded 0.010 slot size screening in the well column. The selected consultant will install the wells to a depth above or slightly into the competent rock, but no more than five (5) feet into competent bedrock. A protective flush-mounted manhole will be cemented in place around the PVC riser and finished flush with surface grade. Each monitoring well will be completed with a watertight locking cap for security.

- **Installation of additional bedrock wells –**

As part of the characterization activities, the installation of five (5) additional bedrock monitoring wells (MW-7, MW-8, MW-9, MW-10, and MW-11) are being proposed in an effort to complete the delineation efforts in the bedrock aquifer. The Professional Geologist will utilize the information from the fracture trace analysis and geophysical investigation as well as actual site conditions to determine the locations of the five (5) proposed bedrock monitoring wells. The SCR will discuss the efforts completed and provide the locations in which the bedrock monitoring wells were installed.

The five (5) bedrock wells are anticipated to be advanced to a total estimated depth of 70 feet below surface grade. However, based on available information, it is possible that water bearing fractures may be present in the bedrock at shallower depths. As such, the consulting firm selected during the bidding process will be instructed that if water is encountered at a shallower bedrock depth, then it needs to be appropriately investigated. If the Professional Geologist determines that water is present at a shallower bedrock depth and needs to be investigated with additional, appropriately constructed monitoring well(s), the shallower bedrock wells would be constructed as determined appropriate by the Professional Geologist and dictated by actual site conditions. In addition, B&B will remind the selected consulting firm that careful consideration needs to be taken when installing the five (5) proposed bedrock monitoring wells. Specifically, the wells should not be over drilled, under screened, or screened across the overburden and bedrock.

Drilling is to be conducted under the supervision of a Pennsylvania-licensed Professional Geologist and the construction specifications will be determined by the Professional Geologist and dictated by actual site conditions (i.e. actual depth to bedrock, actual depth to groundwater, etc.). The wells should be drilled and constructed in accordance with generally accepted practices as outlined in the PADEP Groundwater Monitoring Guidance Manual, dated January 1, 1999 (Document # 383-3000-001). Based on

anticipated drilling conditions, a Pennsylvania-licensed driller should install the wells using air-rotary methods.

Following the installation of the proposed bedrock monitoring wells, the Professional Geologist at the selected consulting firm will review the available construction logs for the current monitoring well network and make a determination as to whether some, none, or all of the wells need to be appropriately abandoned and possibly replaced. All monitoring well locations will be advanced in the locations proposed in the work plan, unless the presence of utilities, obstructions, or safety concerns requires a change in the location. In addition, the estimated construction specifications provided above may need to be altered during drilling as dictated by actual site conditions.

4. Complete Site Survey and Evaluation of groundwater flow –

Following the installation of the additional monitoring wells, a Pennsylvania-licensed surveyor will survey and map the Site and all pertinent features. All identified monitoring well locations will be surveyed relative to an arbitrary benchmark, the Site buildings, property boundaries, and important Site features with the purpose of placing their horizontal coordinates on a scaled site map. In addition, the vertical coordinates of the new monitoring well top of casings and surface grade will be surveyed. In conjunction with collecting depth to groundwater readings during sampling events and in an effort to establish groundwater flow in each of the identified water bearing zones at the Site. Tops of casing for the existing monitoring wells will also be surveyed to facilitate the construction of Site wide groundwater flow maps. In addition, the presence of SPL (if detected) will be taken into consideration when calculating the static water levels in the wells and constructing Site wide groundwater flow maps (a groundwater flow map will be generated for each identified aquifer). Groundwater elevation data collected following the installation of the additional monitoring wells along with data from the site survey will be utilized to produce a series of summary figures to be included in the SCR which will provide additional information as to the groundwater flow direction in each aquifer identified (both overburden and bedrock) at the Site.

5. Aquifer testing – Slug tests, Step test and Pump test –

- **Slug Tests –**

Rising head slug testing will be conducted on three (3) of the bedrock monitoring wells to be installed at the Site. A PVC slug will be used to displace the static water level in the well while a transducer will record water levels before the slug is placed in the well, during the recovery of the water level back to the original static water level, and following the removal of the slug. Transducers will be used to monitor the water levels in the wells during each of the slug tests. The data collected by the

transducer during the slug tests, the selected consultant will calculate Site-specific hydrogeologic values including permeability. All of the calculated values will allow for the modeling efforts and risk assessment activities to be conducted with Site specific data rather than using published values. In addition, the data collected during the slug testing of the bedrock monitoring well(s) will be evaluated to determine the appropriate monitoring well to be used for the step test and the eight (8) hour pump test.

- **Step Test –**

The bedrock monitoring well demonstrating the highest permeability during the slug test will be used for the step test and the subsequent eight (8) hour pump test. The selected consultant will conduct a two-hour step test on the well determined by the slug test results to have the highest permeability within the source area. The data collected during the step drawdown test will be used to determine an optimal pumping rate and yield for the constant rate pumping test.

- **Pump Test –**

Once the pumping rate has been determined, an eight (8) hour constant rate pumping test will be conducted by the selected consultant on the selected bedrock monitoring well at the Site. Transducers will be used to monitor the resultant water levels in the pumping well and surrounding monitoring wells to be determined at a later date. Also, the remaining monitoring well network will be gauged periodically throughout the test to provide additional aquifer characterization data. Data collected during the constant rate pumping test will be analyzed and used to calculate Site specific aquifer values including hydraulic conductivity, transmissivity, storage capacity, and groundwater seepage velocity. All of the calculated values will allow for the modeling efforts and risk assessment activities to be conducted with Site specific data rather than using published values.

Please note, that the selected consultant will be advised that additional slug testing efforts may be necessary in the proposed overburden/weathered bedrock monitoring wells. However, until appropriately constructed overburden/weathered bedrock monitoring wells are installed and the presence of water is confirmed; additional details on the aquifer testing cannot be appropriately determined and provided.

6. **Soil Gas Sampling –**

During the characterization of the Site, a total of three (3) soil gas samples are proposed to be collected during each of the two (2) soil gas sampling events. As part of the soil gas

investigation, samples will be collected in laboratory provided Summa canisters equipped with laboratory calibrated flow regulators and analyzed for the PADEP Constituents list for unleaded gasoline via TO-15.

The vapor intrusion investigation should be completed in a manner consistent with the Land Recycling Technical Guidance Manual – Section IV.A.4 Vapor Intrusion Into Buildings from Groundwater and Soil under the Act 2 Statewide Health Standards, Document 253-0330-100, dated January 24, 2004.

All soil gas points will be advanced in the locations proposed in the work plan, unless the presence of utilities, obstructions, or safety concerns requires a change in the location. Results from soil gas sampling events will be summarized and presented to the PADEP in the SCR.

7. **Sensitive Receptor Survey –**

As part of the characterization investigation, the selected consultant will be tasked with performing a Sensitive Receptor Survey (SRS) for the Site. A 1,000-foot radius water usage survey will be completed in an effort to document the area water use. As part of the water usage survey, the selected consultant will complete the following:

1. Conduct a private and public well search by obtaining an area specific report;
2. Obtain and review tax maps for the area;
3. Contact the local municipality and water authority to confirm water usage in the area of the Site and any local restrictions on water usage;
4. Review of previously completed sensitive receptor surveys;
5. Review of county property assessment records;
6. Canvass of the area; and
7. Field verification of water supply to surrounding properties.

Results from the SRS will be summarized and included in the SCR.

8. **Groundwater monitoring and sampling –**

Following the installation and development of the additional bedrock monitoring wells and shallow monitoring wells (if sufficient groundwater is present), the selected consultant will gauge and sample the expanded monitoring well network. The selected consultant will conduct a minimum of two (2) groundwater monitoring and sampling events prior to the preparation and submittal of the SCR.

During each of the groundwater monitoring and sampling event, static water levels within each well will be measured using an electronic oil/water interface probe, which is capable of detecting both SPL and water to an accuracy of 0.01 feet. All water levels will be collected within the smallest timeframe to ensure the collection of representative static water levels in the wells. If a measurable amount of SPL is detected in a well, the thickness of SPL will be measured, recorded, bailed from the well, and contained in a 55-gallon drum at the Site.

Following gauging activities, the selected consultant will appropriately purge and sample each of the available monitoring well using an acceptable method. Groundwater samples collected during each of the events will be sent to an accredited laboratory to be tested for the required constituents of concern in accordance with Pennsylvania's Storage Tank Regulation procedures and cleanup standard criteria as specified in Pennsylvania's Act 2. Specifically, each sample will be analyzed for PADEP unleaded gasoline short lists (benzene, toluene, ethylbenzene, total xylenes, MTBE, naphthalene, isopropylbenzene, 1,3,5-trimethylbenzene, and 1,2,4-trimethylbenzene).

Please note that the number of wells to be sampled may need to be altered based on investigation observation and evaluation. Specifically, if a shallower bedrock aquifer is identified and additional bedrock monitoring wells are installed; then the wells will be developed and sampled accordingly. If existing wells are deemed inappropriately constructed and subsequently abandoned, then the wells will be removed from the sampling schedule. If replacement bedrock monitoring wells are needed, then the wells will be installed, developed and sampled accordingly. Results from groundwater monitoring and sampling events will be summarized and presented to the PADEP in the SCR.

9. Preparation and submittal of a SCR -

Following the completion of the proposed Site Characterization activities and receipt of analytical results from a minimum of two (2) groundwater sampling events following the installation and development of the proposed bedrock monitoring wells and the proposed shallow bearing zone well(s) (if sufficient groundwater is present), the selected consultant will prepare a SCR for the Site. The report will summarize the results of the recent investigations, the findings of the previous investigations, a comprehensive Site history, sensitive receptor information, geologic data and cross sections, results and analysis of the aquifer testing, soil boring logs, monitoring well construction logs, a series of summary tables, and figures illustrating the information provided in the report.

The Report will be completed following the guidelines specified in Pennsylvania Code, Title 25, Chapter 245 and the Land Recycling Program (Act 2) Technical Guidance Manual for a Site Characterization Report. The selected consultant will also present significant

Mr. Kevin Walker and Mr. Thomas Thompson
The Pennsylvania Department of Environmental Protection
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conclusions and make recommendations for future work at the Site in the SCR. The report will be appropriately signed and sealed by a licensed Professional Geologist.

Following collection of the second round of groundwater monitoring and sampling data, a determination will be made whether additional characterization efforts will be needed or if the completed efforts have fully characterized and delineated the groundwater and soil at the Site. The selected consultant will keep the PADEP updated on the progress of the investigation.

Please note that cost adders are included in the framework of the bid package to allow for activities that were not included in the base scope of work discussed in the work plan, but maybe later determined to be necessary. For instance, a cost adder has been included to cover a scenario where the Professional Geologist has determined that water is present at a shallower bedrock depth and needs to be investigated with additional, appropriately constructed monitoring well(s). Following the installation of the proposed bedrock monitoring wells, the Professional Geologist at the selected consulting firm will be able to review the available construction logs for the current monitoring well network and make a determination as to whether some, none, or all of the wells need to be appropriately abandoned and possibly replaced. Again, cost adders structured into the bid package will allow for abandonment and replacement of the wells are needed. Once properly constructed monitoring wells can be installed, then the appropriateness of the current monitoring well network can be determined by a licensed Professional Geologist and the groundwater flow direction in each water bearing zone can be determined.

With regards to investigation derived waste (IDW), the selected consultant will be advised to dispose of all IDW waste and purge waste as per the PADEP Northeast Regional Office (NERO) guidance and to check with the NERO for current requirements. The selected consultant will be responsible for arranging any offsite waste disposal (if required).

If no response is received from the PADEP within 30 days, the City of Bethlehem, B&B, ICF and USTIF will assume that the PADEP is in agreement with the proposed workplan and will proceed with bidding out the project.

Mr. Kevin Walker and Mr. Thomas Thompson
The Pennsylvania Department of Environmental Protection
November 5, 2012
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Thank you in advance for your assistance on this project and please feel free to contact B&B if you have any questions or need any additional information.

Sincerely,
B&B Diversified Enterprises, Inc.



Carl Bastian, P.G.
President



Mark Bedle
Vice President



Valerie L. Gourley
Project Manager



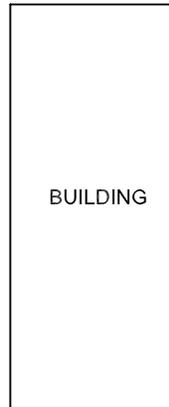
Cc: File
Ms. Jennifer Goodyear, ICF International
Mr. Matthew Dorner, City of Bethlehem



BROAD ST.

STEFKO BOULEVARD

PARKING



FORMER USED MOTOR OIL UST AREA

MW-4

MGB-4/MG-4

MGB-5B/MG-5B

MGB-6/MG-6

SG-2

SG-3

MW-3

SB-1

SB-2

MW-5

SS#3U

SS#4U

SS#1U

SS#2U

SS#5U

SS#1

SS#2

SS#3

SS#4

SS#5

SS#6

SS#7

SS#8

SS#9

SS#10

SS#11

SS#12

SS#13

SS#14

SS#15

SS#16

SS#17

SS#18

SS#19

SS-1

SS-2

SS-3

SS-4

DSS-2

DSS-3

DSS-1

MW-1

MGB-3/MG-3

MGB-2

MW-6

BUILDING

DISPENSERS

LEGEND

- GROUNDWATER MONITORING WELL
- ATTEMPTED MONITORING WELL
- LOCATION - 09/20/10
- HISTORICAL SOIL BORING LOCATION
- PROPOSED OVERBURDEN/WEATHERED BEDROCK MONITORING WELL LOCATION
- PROPOSED SOIL BORING LOCATION
- PROPOSED SOIL GAS POINT LOCATION

NOTE: THE PROFESSIONAL GEOLOGIST WILL UTILIZE THE INFORMATION FROM THE FRACTURE TRACE ANALYSIS AND THE GEOPHYSICAL INVESTIGATION, AS WELL AS ACTUAL SITE CONDITIONS, TO DETERMINE THE LOCATIONS OF THE FIVE (5) PROPOSED BEDROCK MONITORING WELLS (MW-7 THROUGH MW-11).



APPROXIMATE SCALE
DIMENSIONS TAKEN FROM SITE PLANS DRAFTED BY URS

TITLE PROPOSED MONITORING WELL AND SAMPLE LOCATION MAP			
PROJECT CITY OF BETHLEHEM MUNICIPAL GARAGE BROAD STREET AND STEFKO BOULEVARD			
DIVERSIFIED ENTERPRISES, INC. PO BOX 188 GWYNEDD, PENNSYLVANIA 19436			
SCALE AS SHOWN	DWN. BY RS	JOB NO. ICF-BETHLEHEM	
DATE 10/02/12	APPR. BY MB	FIG. NO. 1	



Pennsylvania Department of Environmental Protection *99-083 F*
Jennie

2 Public Square
Wilkes-Barre, PA 18711-0790
August 14, 2008

Northeast Regional Office

570-826-2511
Fax 570-820-4907

CERTIFIED MAIL NO.: 7008 0500 0001 3036 8281

RECEIVED

AUG 20 2008

ICF, Inc.
PAUSTIF

RECEIVED

AUG 18 2008

Mr. Matthew Dorner
City of Bethlehem
10 East Church Street
Bethlehem, PA 18018

BUREAU OF SPECIAL
FUNDS

Re: Closure/Remediation File
City of Bethlehem-Municipal Garage
UST Site Characterization Report Addendum
No. 2 Disapproval
Facility I.D. No. 48-19594
Bethlehem, Northampton County

Dear Mr. Dorner:

The Department of Environmental Protection has reviewed the Site Characterization Report Addendum, dated May 29, 2008, relating to the contamination by regulated substances released at the above mentioned facility. This report is disapproved for the following reasons:

- Consistent with the Pennsylvania Code Title 25 § 245.309, Subparagraph 4, the groundwater characterization must determine the regulated substances involved, and the extent of migration of those regulated substances in groundwater. Based on the Department's review of the report, the one comprehensive groundwater sampling event conducted on March 3, 2008 on monitoring wells MW-1 through 3 is not adequate in defining the extent of contamination at the site. In order to confirm the initial round of groundwater sampling and to determine if additional monitoring wells are needed, an additional round of sampling is warranted. This additional round will provide data to determine if the compound detected in the blank collected from monitoring well MGMW-3 is representative of the aquifer or is something encountered during sampling/laboratory analysis.
- The Department recommends that any additional groundwater sampling at the site include the parameters on the revised short list (effective March 15, 2008) for petroleum products for unleaded gasoline, specifically, 1,2,4- and 1,3,5-trimethylbenzene.
- Provide more information on the monitoring well construction differences between MW-2, MW-3 and MW-1. The Department's review of the geologic cross sections indicates that monitoring well MW-1 may not be monitoring the same intervals/fractures as monitoring wells MW-2 and MW-3. The aquifer test indicates that there wasn't any influence in MW-2 and MW-3 when pumping from MW-1.

Mr. Matthew Dorner

-2-

August 14, 2008

Therefore, the Department has determined that further characterization is warranted. The extent of contamination has not been fully delineated. In order to assess the potential impacts to human health and the environment posed by the release(s) at this facility, you should conduct further site characterization activities in accordance with applicable provisions of 25 Pa. Code Section 245.309.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa. C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of the receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in Braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable status and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

The technical review of this report was conducted under the responsible charge of a Pennsylvania licensed professional geologist.

Thank you for your cooperation in working with the Department in the remediation of this site. If you need additional information or have any questions, please do not hesitate to call me at 570-826-2511.

This letter does not waive any rights of the Commonwealth of Pennsylvania to take enforcement action under applicable law for the conditions discussed in this letter.

Sincerely,



Ronald S. Brezinski
Program Manager
Environmental Cleanup Program

cc: Cynthia H. Biedenkopf, City Clerk/Bethlehem
Matthew J. Gordon/ URS Corporation
USTIF