UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Daniel Sevick, President
Frazer/Exton Development, L.L.C.
440 Creamery Way, Suite 150
Exton, PA 19341

September 22, 2016

Re: Operation and Maintenance Program at the Foote Mineral Superfund Site

Dear Mr. Sevick:

As you are aware, the July 2008 Groundwater Monitoring Plan, required quarterly monitoring for the first two years of O&M to be followed by a potentially reduced frequency of monitoring if approved by EPA. EPA's approval of reduced frequency would be based on demonstration of decreasing contamination throughout the plume of contamination. Over the past several years, sample results have shown apparent declining trends in the concentration of contaminants in groundwater in wells GMZ-3 and GMZ-4.

However, the declining trends have not been demonstrated throughout the full extent of the plume. Currently, the furthest monitoring well, well GMZ-1 located 8400 feet downgradient from the source area, is showing an apparent increasing trend for lithium, although at relatively lower concentrations. This is not unexpected considering the temporary disturbance to the source materials caused by the Remedial Actions taken at this site. Considering that the declining trends have not been demonstrated throughout the full extent of the plume, EPA believes that is not yet appropriate to reduce the monitoring requirement to annual sampling. Charts of the lithium concentrations over time in the specific wells are enclosed.

EPA does, however, feel that it is appropriate at this time to reduce the requirement to semi-annual sampling, to be conducted in winter (December/January) and summer (June/July). EPA is therefore asking that you submit a schedule for sampling events to be conducted in the 2016/17 cycle, with assurance that those events will be financed. If you have any questions concerning this information, please contact me at (215) 814-3190 or via e-mail at feeney.jim@epa.gov.

Sincerely,

James J. Feeney
Remedial Project Manager

Enc: Results table and figures
CC: B. Pugh - EPA
R. Bower - EPA
M. Gold - MGKF

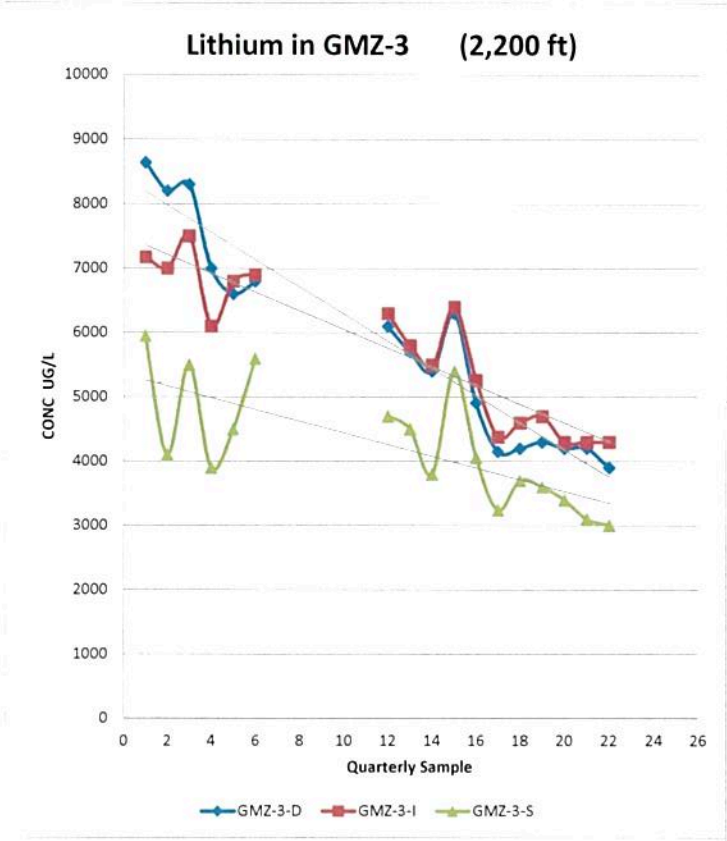
FOOTE MINERAL SUPERFUND SITE
GROUNDWATER MONITORING RESULTS (unfiltered, except where noted)

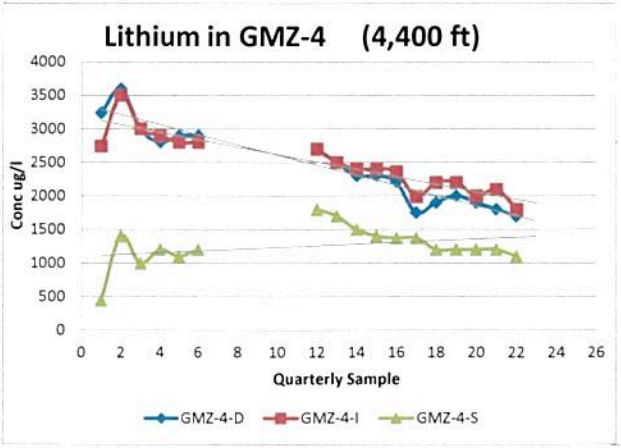
LITHIUM (STD-260)

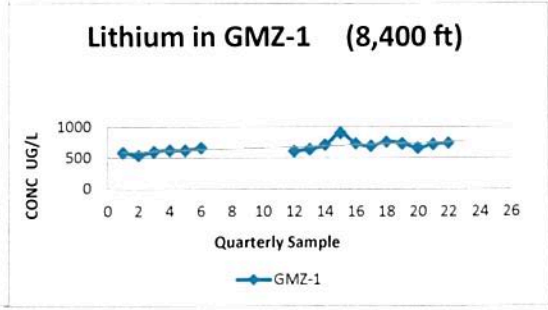
	1	2	3	4	5	6	12	13	14	15	16	17	18	19	20	21	22
(on-site)	2010 DEC	2011 MAR	2011 JUN	2011 SEP	2011 DEC	2012 MAR	2013SEP	2013DEC	2014MAR	2014JUN	2014OCT	2015MAR	2015JUN	2015SEP	2015NOV	2016MAR	2016MAY
ERM 1D	**8475.8**	**7600**	**7200**	**6800**	**6700**	**7200**	**6400**	**5900**	**5600**	**6800**	**5680**	**4770**	**5300**	NS	**4500**	**4500**	**4000**
ERM 1S	**492.6**	200	240	**330**	250	**330**	**270**	**600**	**330**	**370**	NS	170	**220**	NS	NS	NS	NS
ERM 2D	91.8	92	99	87	81	90	91	89	84	87	75	81.3	75	ND	83	83	73
ERM 2S	**357.5**	**370**	**330**	**320**	**320**	**360**	**330**	**350**	**380**	**360**	**341**	**330**	**330**	**2.1j**	310	**350**	**350**
ERM 5	26.5	28	27	30	16	25	24	27	24	**30**	30.8	285	**24**	24	27	21	23
MW 22	**24198**	**20000**	**26000**	**13000**	**14000**	**12800**	**20000**	**21000**	**16000**	**15000**	**23100**	**13200**	**18000**	**19000**	**17000**	**17000**	**22000**

(plume)	2010 DEC	2011 MAR	2011 JUN	2011 SEP	2011 DEC	2012 MAR	2013SEP	2013DEC	2014MAR	2014JUN	2014OCT	2015MAR	2015JUN	2015SEP	2015NOV	2016MAR	2016MAY
GMZ-1	**585**	**540**	**600**	**620**	**620**	**660**	**610**	**640**	**710**	**900**	**732**	**696**	**760**	**730**	**660**	**720**	**740**
GMZ-2-D	3.1	4.5	3.8	0.44	3.8	11	10 U	10 U	ND	ND	0.59 j	1.7J	1.6j	81	8.4j	1.1J	1.8J
GMZ-2-I	2.7	2.2	2.6	10 U	4.2	10 U	10 U	10 U	ND	ND	2.8 j	2.5J	4.1j	5j	6.7j	4J	3.2J
GMZ-2-S	4.2	1	0.98	10 U	0.42	10 U	10 U	10 U	ND	ND	1.2 j	0.56J	2.0j	340j	5.9j	1.6J	1.7J
GMZ-3-D	**8640**	**8200**	**8300**	**7000**	**6600**	**6800**	**6100**	**5700**	**5400**	**6300**	**4910**	4150	**4200**	**4300**	**4200**	**4200**	**3900**
GMZ-3-I	**7170**	**7000**	**7500**	**6100**	**6800**	**6900**	**6300**	**5800**	**5500**	**6400**	**5260**	**4380**	**4600**	**4700**	**4300**	**4300**	**4300**
GMZ-3-S	**5950**	**4100**	**5500**	**3900**	**4500**	**5600**	**4700**	**4500**	**3800**	**5400**	**4060**	**3240**	**3700**	**3600**	**3400**	**3100**	**3000**
GMZ-4-D	**3240**	**3600**	**3000**	**2800**	**2900**	**2900**	**2700**	**2500**	**2300**	**2300**	**2210**	**1750**	**1900**	**2000**	**1900**	**1800**	**1700**
GMZ-4-I	**2740**	**3500**	**3000**	**2900**	**2800**	**2800**	**2700**	**2500**	**2400**	**2400**	**2360**	**1990**	**2200**	**2200**	**2000**	**2100**	**1800**
GMZ-4-S	**444**	**1400**	**1000**	**1200**	**1100**	**1200**	**1800**	**1700**	**1500**	**1400**	**1370**	**1370**	**1200**	**1200**	**1200**	**1200**	**1100**

(Surf Wtr)	2010 DEC	2011 MAR	2011 JUN	2011 SEP	2011 DEC	2012 MAR	2013SEP	2013DEC	2014MAR	2014JUN	2014OCT	2015MAR	2015JUN	2015SEP	2015NOV	2016MAR	2016MAY
SW-01	**880**	**530**	**500**	**470**	**460**	**690**	**760**	**900**	**560**	**730**	**1060**	**730**	**700**	**1000**	**790**	**660**	**610**
SW-02	**484**	150	76	58	**320**	**270**	**352**	**500**	**380**	490	**408**	**350**	**230**	**300**	**200**	**220**	**38**
SW-03	3.2	15	3.3	40	42	10 U	5 U	10 U	18	17	**4.1**						
SW-04	2.4	1.7	2.4	ND	1.4	10 U	5 U	10 U	ND	NS	NS						
SW-05												740	670	1000	800	670	590
SW-06												560	450	880	720	520	38


Lithium in GMZ-3 (2,200 ft)
CONC UG/L
Quarterly Sample
GMZ-3-D
GMZ-3-I
GMZ-3-S


Lithium in GMZ-4 (4,400 ft)
Conc ug/l
Quarterly Sample
GMZ-4-D
GMZ-4-I
GMZ-4-S


Lithium in GMZ-1 (8,400 ft)
CONC UG/L
Quarterly Sample
GMZ-1