

December 1, 2008

Mr. Keith Orris
Franklin & Marshall College
P.O. Box 3003
Lancaster, PA 17604-3003

**RE: BRICK YARD REMEDIATION PROJECT
RT PROJECT #71384-01**

Dear Mr. Orris:

In response to your recent letter, there are still a number of unaddressed issues regarding the above-referenced project.

These are as follows:

- Your recent letter does not indicate that there are plans to manage raw material with friable asbestos, according to the National Emissions Standards for Hazardous Air Pollutants. There is a difference between materials which become friable as a result of loading, and those which are already friable, when encountered. Materials containing HYDROCORD would undoubtedly meet the latter description. Following the recent public meeting, Mr. Ned E. Wehler, of ARM Group, Inc. indicated that NESHAP program requirements will be followed. Mr. Wehler also stated that no waiver would be applied for, which is inconsistent with your letter. When and if materials are encountered which contain HYDROCORDIC backing, and which are already friable, it is requested that you describe the specific procedures that will be followed for raw materials, which will reportable avoid fiber release incidents and not require a waiver.
- In the public meeting, Mr. Wehler also promised that there will be "real time" monitoring for lead fugitive dust emissions. Use of Draeger Tubes and XRF technology were cited, as technology to complete this type of measurement. We are familiar with both technologies, and are not aware that fugitive dust emissions can be measured, on a "real time" basis as described. Please respond with the name of the specific technology to be used for measuring fugitive dust emissions, which will address the lead in soil concentrations, which cause the potential for dust emissions with lead. Please supply the specifics for the promised property line fugitive dust emission monitoring program.
- As there are adjacent waste disposal units, and not all waste will be removed, an opinion needs to be put forth as to whether there are or are not "commingled" plumes. We have described this situation to PADEP who is evaluating it further. Please note carefully that with only four quarters of post excavation groundwater monitoring planned, after the removal activity, that it may not be known for some time, as to whether Cleanup Liability Protection can be conferred on the groundwater release at the site for metals, given the extent of foundry sand, and waste containing metals, present on the adjacent disposal sites. To avoid a surprise later, should contaminant concentrations not fall off after completion of the removal activity, we would strongly recommend careful evaluation of the



Mr. Keith Orris
Franklin & Marshall College
RT Project #71384-01
December 1, 2008
Page 2

upgradient and downgradient conditions, groundwater flow directions, etc. now. Otherwise, it could be risky to redevelop the site, not knowing for sure, that the removal activity will not result in removal of all disposal of contaminants, given the adjacent disposal areas which could also impact groundwater, and could make approval of the Final Report and obtaining Cleanup Liability Protection difficult or not possible at some future time.

- There also remains a question related to the Deissly Farm property. Is the reference the ARM Report to this property being developed in the future, a proposed "pathway elimination" demonstration or not? If this is meant to be a pathway elimination demonstration, then it would appear in appropriate to rely on that at this time, unless the property owner has currently agreed to this demonstration, as, there is no guarantee that the "future use" limiting exposure to impacted groundwater will actually occur.

We look forward to your responses to these items.

Very truly yours,

RT ENVIRONMENTAL SERVICES, INC.



Gary R. Brown, P.E.
President

GRB\jw

F:\RT Projects\71300 SERIES\71384-01\713840106.doc

Cc: M. Davis, Esq. – Barley Snyder Senft & Cohen, LLP,
K. Horvath, P.G. – PADEP,
K. Ashworth - TRRAAC
Manheim Township
Lancaster Township
East Hempfield Township