

August 27, 2008

Mr. Keith A. Orris
Vice President for Administrative Services & External Affairs
Franklin & Marshall College
PO Box 3003
Lancaster, PA 17604
(717) 291-3993 Fax (717) 358-4528

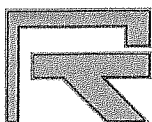
**RE: RESPONSE TO YOUR LETTER DATED JULY 28 AND
REMEDIAL INVESTIGATION REPORT/CLEANUP PLAN COMMENTS
RT PROJECT #71304-01**

Dear Mr. Orris:

I am in receipt of your recent letter, I have reviewed the Remedial Investigation Report (RIR) and Cleanup Plan, and on behalf of TRRAAC, respond as follows:

FRIABLE ASBESTOS FINDINGS

- There is considerable evidence to show that large quantities of asbestos containing flooring material from the Lancaster Armstrong plant was disposed of in the landfill. RT has substantial experience on asbestos containing material projects, and we are surprised that there would be a situation that older sheet and/or tile flooring material would not have to be managed as potentially friable material. The reason for this is that for many years, when such material is broken during demolition and/or loadout, both the USEPA and the Pennsylvania Department of Environmental Protection consider such material to be "friable". Normal excavation of brittle flooring tile or sheet material, and placement in a truck, involves the use of heavy equipment, and breakage into small pieces occurs frequently upon truck loading, especially when the material is mixed with demolition or municipal waste. We strongly recommend that this issue be revisited, or, if waivers have been applied for, and a licensed asbestos inspector or project planner has specifically determined that the Armstrong waste material is non-friable and will remain unfriable during loading and transport; we request to see that determination in writing. This is particularly important, as documents in DEP's files suggest that the material to be excavated was previously considered "clean fill".
- Your consultant's laboratory determinations of non-friable from an "in the ground" sample is not a determinative finding when material is to be the subject of large scale excavation and removal. We strongly recommend that if the project goes forward, that all identifiable sheet and tile asbestos containing materials (ACMs) be properly managed as "friable" or "potentially friable", as has been the case in other similar projects. As indicated below, Armstrong's sheet products with Hydrocord backing that were disposed of are friable or will become friable. Note that this determination and the proper management method should have been disclosed prior to the public meeting. The Remedial Investigation Report and Cleanup Plan failed to adequately investigate or disclose that large quantities of one or more Armstrong floor products as follows were received by LCSWMA and are obviously present in the landfill:



- Futuresq Corlon (Introduced in 1957)
- Tessera Corlon (Introduced in 1958)
- Montina Corlon (Introduced in 1961)
- Excelon Vinyl-Asbestos Tile

Research of these Armstrong products can be found in Attachment 1. Trucking of these scrap products to the "Lancaster Landfill" is reported to have began in 1957. The significance of these materials is that they had "Hydrocord" backing. They were manufactured with this backing so as to be able to be installed on concrete floors. This material was produced in a manner similar to how ACM gaskets were produced. Hydrocord contained latex asbestos. As it is a "backing" such material is usually considered by regulatory agencies to be vulnerable to delamination and to therefore be in a friable form rather than as hard, solid tile and sheeting products would be. Backing material at the site today is likely crumbly and delaminated.

Shipped to the landfill were large quantities of this material resulting from:

- Ends of rolls
- Edge trimming waste
- Other materials rejected for quality assurance/quality control reasons.

Your consultant's own information shows that Armstrong flooring products were disposed of at the site and the attached documents show that the disposal occurred during the period that Armstrong used asbestos. We would also recommend that you check with Armstrong on any other ACM products shipped to the landfill. **Table 1** contains a list of references TRRAAC members readily located. Capping and no landfill disturbance appear to be the only feasible alternative for landfill remediation given the significance of this new finding – friable material in significant quantities will in all likelihood be encountered during landfill excavation. The July 31, 2006 Step 1 investigation clearly identified the material as Armstrong's. It is very surprising that the ARM Group's September 2002 Environmental Due Diligence Evaluation failed to identify the potential for asbestos containing material. Moreover, the Notice of Intent to Remediate sent to DEP and Manheim Township does not mention asbestos containing material. In summary, the RIR failed to adequately investigate or disclose that large quantities of one or more Armstrong floor products as follows were disposed of at this site.

GANNETT FLEMING/RAIL YARD DESIGN

- We agree that Gannett Fleming is a reputable consultant, but the June 12th letter further indicates that there is apparently not an objective assessment of rail yard alternatives. It is not TRRAAC's responsibility to complete engineering alternative evaluation work. Given the size and scale of state and/or federal funding, we would have expected that an objective review of railyard alternatives be included in the materials made publicly available. Based on the most recent letter from Gannett Fleming, Norfolk Southern is having input into the process, as expected, but we see nothing in writing from Norfolk Southern, to have the railroad formally go on record justifying what alternatives are and are not feasible operationally. One would normally anticipate an objective analysis of alternatives, not simply short answers from a future user, as continues to be presented here.
- With respect to the conclusion in the Gannett Fleming letter that the proposed consolidation plan is a "superior design", this is simply not justified by taking on a former municipal landfill excavation project, including excavation of material which has been portrayed as clean fill, but will more than likely need to be managed under state and federal regulations and law, as friable asbestos material. A fair and reasonable evaluation of alternatives still has not been presented.

RIR/CLEANUP PLAN COMMENTS

- The RIR/Cleanup Plan has been reviewed and additional comments are as follows:
 - The RIR does not contain an adequate characterization and disclosure that there are apparent Hydrocord-backed friable sheet floor waste products at the site and in the landfill. These materials, based on industry knowledge, delaminate over time. Armstrong produced large quantities of products with Hydrocord and waste materials were accepted at this landfill which remain today. As this is a dual layered material with a latex asbestos backing, excavation and loadout does present a higher risk of asbestos fiber release than is presented by more traditional forms of floor sheeting or tile as inferred in the ARM Report.
 - Separation of friable and non-friable materials in a codisposal landfill could prove infeasible and not cost effective. At a minimum, more thorough checking of the waste disposal history and recharacterization of the waste mass is needed. Any exposed asbestos containing materials (ACMs) should be covered without delay.
 - The issue of ACM excavation and loadout is broader than being only an OSHA issue. Friable ACM requires special handling procedures and will cause increased project costs. The Cleanup Plan does not adequately describe the presence of this material nor the detailed means and methods to properly manage friable ACM waste materials and procedures to avoid exposure, as would normally be required as part of a Site Specific Standard Cleanup Plan. State and federal regulations other than OSHA regulations apply to excavation, transport and disposal of this material including the Commonwealth's own

residual and municipal waste regulations. These are not discussed in detail but should be discussed in detail in the Cleanup Plan. I did not find any reference that licensed ACM Inspectors nor Abatement Workers will be employed to handle the friable materials at the time of excavation.

- o The ARM report cites planned attainment of the non-use aquifer standard (Page VI). Elsewhere, the report states that a Site Specific Standard will be used for groundwater. If PADEP has not issued a non-use aquifer designation for the project area, the non-use aquifer standard should not be cited and the report revised.
- o It has not been demonstrated that the Cleanup Plan can be safely implemented given LCSWMA's receipt and Armstrong's use of the site for disposal of its ACM products for a decade or more.
- o The Cleanup Plan should be revised to reflect that the closure could be interrupted and materials closed in-place by economic necessity if large quantities of friable ACM prove to be difficult and/or costly to separate and properly manage. The Cleanup Plan currently says HAZMAT teams may be used if project resources are exceeded but HAZMAT teams will not typically assist with this type of planned excavation and removal project. It also should be noted that we do not believe that screening and separation of materials into clean and waste fractions is appropriate or safe in this type of historic industrial and municipal waste codisposal situation.

OTHER ENVIRONMENTAL REPORTS STILL AWAITED

Please note that the long awaited final environmental reports, including noise data, have yet to be received. Without receipt of the environmental reports, which have been promised forthcoming "soon" since April, it is not possible to fully respond with comments as you request, by August 30th. We recommend that you leave the public record open for response, until 30 days after the long awaited reports are actually received. Such is typically required for a proper Public Involvement Program under the Act 2 Land Recycling process. We certainly hope given the long delays, that this information is forthcoming soon and I trust that I will be notified when relevant documents are posted on the F&M Webpage, if that is the informal form of distribution you choose.

CLEANUP ALTERNATIVE/RAIL YARD ALTERNATIVE

In conclusion, it should be pointed out that the landfill can be adequately remediated by:

- A. Implementing ARM's Site Specific Standard Attainment Cleanup Plan for groundwater.
- B. Clearing the trees, providing a soil cover and revegetating the site.

Mr. Keith Orris
Franklin & Marshall
RT Project 71304-01
August 27, 2008
Page 5

Regulatory authorities can already require LCSWMA to implement needed soil cover to avoid asbestos exposure at any time, so the only apparent environmental advantage to the railyard relocation project is to address impacted groundwater. ARM concluded that the solvent and volatiles impacted groundwater is not a major release warranting actual cleanup and can be addressed through natural attenuation.

Relocation of the rail yard on this parcel therefore should be balanced against the risk of excavating an old industrial and municipal waste codisposal landfill with large quantities of ACM from a nearby major industry, whose wastes are well known, but whose partially friable ACM composition has not been properly factored into the Cleanup Plan. As an appropriate Cleanup Plan has not been put forth to date, we disagree with Gannett Fleming's statement that a "superior design" and remedial project justifies going forward.

FINDINGS AND CONCLUSION

In my opinion, the presence of friable ACM should have been known to LCSWMA and ARM prior to the beginning of the site investigation work. As such is not the case, the project should be fully reevaluated as it is apparent that the project could lack fundamental environmental and/or economic feasibility. The RIR work is incomplete and apparent large quantities of friable asbestos material are not addressed.

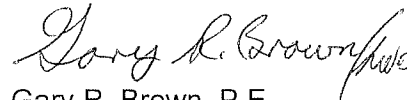
Given the Armstrong Hydrocord material findings, which should have been known long ago, we would strongly recommend rescoping the rail yard project and not to continue proposing a large scale codisposal ACM/municipal waste landfill excavation project without appropriate procedures in the Cleanup Plan to address the friable ACM present at the site.

In summary, it is clear that the landfill contains friable ACM materials. These materials cannot be feasibly excavated and loaded without causing asbestos fiber release. The project should be reevaluated; if similar Armstrong materials are ubiquitous in the landfill as suspected, the waste mass will likely need to be covered and not excavated. This is because of the high risk and cost that is associated with trying to excavate large quantities of friable ACM mixed in with large volumes of other materials.

Thank you for the opportunity to comment.

Very truly yours,

RT ENVIRONMENTAL SERVICES, INC.



Gary R. Brown, P.E.
President

Mr. Keith Orris
Franklin & Marshall
RT Project 71304-01
August 27, 2008
Page 6

Cc: TRRAAC,
Manheim Township,
East Hempfield Township,
Lancaster Township,
J. Bolstein, Esq. – Fox Rothschild,
J. Warner – LCSWMA,
J. Bergen – Lancaster General,
K. Horvath – PADEP