



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

August 14, 2008

The Rail Road Action & Advisory Committee (TRRAAC)
P.O. Box 4155
Lancaster, PA 17604-4155

Re: Request for Environmental Investigation
Former Lancaster Brickyard Dump (PA-1901)
Manheim Township, Lancaster County

Dear Committee Members:

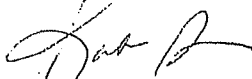
This reply is in response to the committees' letter and petition to the Environmental Protection Agency (EPA), dated May 9, 2008 requesting an investigation of potential groundwater and soil contamination associated with the former Lancaster Brickyard Dump and the existing Norfolk Southern (Dillerville) Rail Yard (Eastern Section). The TRRAAC has expressed concerns regarding the possible environmental and human health impacts associated with the proposed relocation of the rail yard to the dump site which is presently owned by the Lancaster County Solid Waste Management Authority (LCSWMA). The rail yard would be relocated in conjunction with the proposed 67-acre Lancaster Northwest Gateway/Armstrong Site redevelopment project. This project would result in the expansion of Franklin & Marshall College's campus, Lancaster General Hospital and related retail/commercial development in this former industrial area. The potential exposure of nearby residents to asbestos containing materials (ACMs) and other hazardous wastes disposed in the landfill has been raised as a public health issue, if proper remediation measures aren't taken. The TRRAAC has proposed an alternate site to the east-southeast of the existing yard on Norfolk Southern Property which is away from residential areas.

The former Lancaster Brickyard Dump was previously investigated by EPA Region III's CERCLA (Superfund) Site Assessment Program initially in 1987 and again in 1989-1990. A Preliminary Assessment (PA) was completed in July 1987 and was followed by a Site Inspection (SI) in January 1990. The PA/SI approach is typically followed for sites being considered for possible listing on the Superfund National Priorities List (NPL), which represents the list of the nations worst hazardous waste disposal sites in terms of human health and environmental impact. At the time, EPA determined, based on the PA/SI results that the site did not meet the minimum criteria for listing consideration and therefore was designated as "No Further Response Action Planned" in 1990 and a Final Assessment Decision (FAD) was made in 2001 that (based on existing information) the site was not of ongoing federal interest.

Based on information supplied by the Pennsylvania Department of Environmental Protection (PADEP), it is understood that the site is formally entered into the Act 2 Land Recycling (Voluntary Cleanup) Program ensuring that the investigation and remediation of the landfill will be conducted. As part of the Rail Yard relocation project the landfill will be entirely removed with waste material being disposed of in a permitted solid waste landfill. In addition, remediation of groundwater and soil contamination will be conducted to meet applicable state standards consistent with its proposed land use. The plan to remove the landfill and remediate environmental contamination is being funded entirely by private parties involved in the redevelopment project.

EPA does not believe it is necessary to re-open the site for investigation at this time. However, EPA will be provided a copy of the final landfill investigation report and may, at its discretion, perform a review of this report. Any comments resulting from this review will be presented to the PADEP for consideration. However, the PADEP is under no obligation to address our comments. Should conditions change in the future or if the PADEP requests EPA involvement, we may reconsider our position.

Sincerely,



Kathleen Anderson, Chief
Site Assessment & Non-NPL
Federal Facilities Branch
U.S. EPA Region III



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