

# FRANKLIN & MARSHALL

November 7, 2008

Mr. Gary R. Brown, P.E.  
RT Environmental Services, Inc.  
215 West Church Road  
King of Prussia, PA 19406

Dear Mr. Brown:

I am writing in response to your correspondence of October 10, 2008 and have structured this letter by the order in which topics were contained in your letter.

**1. Sampling:** Our twelve samples of the waste vinyl flooring and linoleum products are adequate for characterization purposes according to the Pennsylvania Department of Environmental Protection (DEP). Each sample represented a different type of flooring product observed at the site. Thus, each distinct, unique type of floor tile was collected and tested for asbestos content. With respect to DEP requirements for characterization, the applicable Chapter 250 regulations do not prescribe a specific number of samples to be collected for characterization purposes, and because the Chapter 250 regulations do not concern themselves with the asbestos content of soil, there is no prescribed set of samples required for characterization purposes with respect to asbestos content. This is the opinion of our consultant, ARM Group Inc. (ARM) which corroborated its findings with experts at DEP. The adequacy of the sampling is also confirmed by DEP's approval of our RICP report on October 3, 2008.

**2. Hydrocord Product:** Based upon Armstrong's manufacturing records for the 1955-1962 time period, Hydrocord backing of waste sheet vinyl may be present on the site. However, there are a number of differing types of waste vinyl and linoleum products evident at the site. ARM personnel identified 12 distinct types of flooring products. Each of them was sampled and tested by the analytical laboratory for asbestos content. Only 2 of 12 samples contained asbestos material, and in both cases, the laboratory determined the material to be non-friable and organically bound. Each of the different types of waste vinyl and linoleum flooring products are adequately accounted for in our waste removal plans.

**3. Project Scope:** Based on our analysis, it is unlikely there will be any "double bagging" of waste floor products. Waste floor products found to contain materials that are prone to producing dust will be wetted by water misting and water soaking procedures to prevent any conditions of friability from producing dust concentrations in excess of regulatory thresholds. If classified by the project's field supervisor (a licensed asbestos inspector) as friable, then these types of materials will be placed, while wet, into an impermeable container (e.g. watertight roll off container), for subsequent transport to and disposal at the Frey Farm Landfill.

Bagging or double bagging procedures are expected to be limited to the circumstance where relatively minor (i.e. small sized) quantities of friable asbestos containing material (if any), such as thermal insulation materials, are encountered.

**4. Other Information:** The information provided in this letter is responsive to your comments regarding Hydrocord, the number of samples and waste management procedures. If you have additional relevant information about any of the waste vinyl floor products beyond the actual laboratory analyses, waste information and sample descriptions that we have already obtained and presented in detail in the RICP report, then we would encourage you to provide that information to us immediately. Respectfully we observe that the information you have provided thus far – while certainly encyclopedic in volume – nevertheless is primarily speculative and anecdotal in nature.

**5. Impulse Noise:** I believe that the “April meeting” in my office to which you refer actually occurred on June 12, 2008 in the Huth Room of the College’s Steinman College Center. As you may recall, we scheduled this meeting to provide you with the results of the noise, vibration, air quality and human health assessment studies that had just been completed, and our goal was to provide it to you in advance of the public meeting that we held a week later on June 19, 2008.

I was not present at the June 12, 2008 meeting, but I have discussed it with Gannett Fleming, our consultants, who were present at the meeting and who were responsible for the air, noise, vibration and human health risk assessment documentation for the project. To be clear, they specifically do not recall promising any raw noise data to you. We are providing it now, however, in the interest of full disclosure. Please see the attached noise summary and data sheets. This attachment includes both 24-hour noise sampling data and 20 minute point sampling data that was conducted in the neighborhood.

Consistent with federal guidelines, it was not the goal of the Gannett Fleming noise study to measure impulsive noise events. However, as part of the 24-hour noise monitoring conducted at the existing railyard for the project, observations on impulsive noise events were made by Gannett Fleming investigators on April 17<sup>th</sup>, 2008 between the hours of 2:00 p.m. and 10:30 p.m. This observation window corresponds to the period of peak railyard activity within the Dillerville Yard as indicated in the attached narrative. Gannett Fleming was able to link a very limited number of these observations to impulsive events they observed at the railyard while conducting their noise monitoring. While Gannett Fleming did identify impulsive noise events generated by railyard activity, it also identified operations at R.R. Donnelly & Sons Company (Donnelly) as a generator of impulsive noise events. Many other activities or noise sources could have caused impulsive noise events to be recorded when investigators were not present on site during the 24-hour monitoring period. Other possible sources of impulsive noise could include barking dogs, train whistles, closing automobile doors and traffic noise on Dillerville Road or Harrisburg Pike. Therefore, it is not accurate for anyone to conclude definitively that the impulsive noise events recorded during the 24-hour sampling period are attributable only to railyard activity.

The Federal Transit Administration (FTA) model used in the General Noise Assessment section of the FTA *Transit Noise and Vibration Impact Assessment* manual, accounts for several activities within the railyard. This is the model that Gannett Fleming used to generate predicted noise levels resulting from the operation of the existing yard and the new yard to be constructed west of Harrisburg Pike. The noise sources, included in the model, are wheel squeal due to tight curves, wheel impacts on joints and switches, wheel rolling noise, coupling/uncoupling and auxiliary equipment such as air-release noise. Some of these sources can produce impulsive noise generating events. Therefore, the model used to predict the future noise levels in the neighborhoods nearest to the new railyard accounts for impulsive noise events when predicted sound levels are calculated.

As we have said publicly, information concerning impulsive noise levels and events is contained in the noise report prepared for the project. Impulsive noise events are discussed in the report on Page 7, (second and third paragraphs). The report is available on the project's website under the June 19, 2008 Public Meeting tab. Based upon the limited number of impulsive noise events that could be identified, the predicted noise levels, for these events would reach 49 db at 1,000 feet, and 41 db at 2,600 feet. These predicted noise levels were developed using an adjustment for distance, while ignoring additional noise level reduction that will be caused by the rows of buildings acting as a sound buffer. In most cases the predicted noise levels are at or below background noise levels and, therefore, will not result in perceptible increase in predicted noise levels in the communities. As you know this topic was addressed at our public meeting in the Question and Answer Session. You can find the minutes of that discussion on the website as well under the Public Meeting tab.

I would like to take this opportunity to again note that the detailed air, noise, vibration and human health risk assessment studies conducted for this project were not required under any of the federal, state or local regulations or guidelines concerning noise. Further, FTA criteria do not require project proponents to specifically consider impulsive noise events in project impact assessment or mitigation. Finally, the results of the noise analysis clearly demonstrate there would not be a noise impact in the neighborhoods near the proposed Dillerville Yard Consolidation Project according to all applicable FTA criteria. Therefore, even if there was a requirement to study noise impacts resulting from this project, there would be no requirement to provide noise abatement because there is no impact.

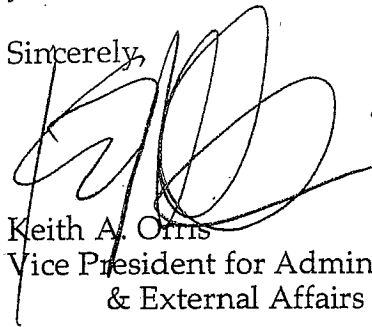
The College and Lancaster General, however, are committed to providing some form of noise abatement to the community even though mitigation is neither warranted nor required. A landscaped berm is a common form of noise abatement used on linear transportation projects. However, the engineering design required to determine the details and efficacy of this type of noise mitigation has not been completed. Therefore, the height of berms or other measures to be used, or their effectiveness in reducing noise impacts have not yet been determined. Typically, neighborhoods located as far from a potential noise source as the neighborhoods of Old School Lane Hills and Barrcrest do not benefit from structural noise abatement

of any kind. We remain willing to install this abatement option, however, and will finalize a design after consultation between the project partners and our engineers.

Finally, regarding your question on whether or not the operations of the new yard will be audible from the surrounding neighborhood, it will depend upon many factors including the time of year, atmospheric conditions, location in the neighborhood, elevation, temperature, weather, other noise producing activities or railyard operations occurring at the time. It is possible that the new yard, like the existing yard, will be audible in the Old School Lane Hills and Barrcrest neighborhoods under certain conditions, but the new yard will not result in noise impacts as defined by FTA standards.

Thank you for your letter and I trust the above information addresses the questions you raised.

Sincerely,



Keith A. Orris  
Vice President for Administrative Services  
& External Affairs

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