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May 5, 2010

Southcentral Regional Office

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Mr. Ned E. Wehler, P.G.
ARM Group, Inc.
PO Box 797
Hershey, PA 17033

Re: Comments Received for the
Lancaster Brickyard Final Report
Manheim Township, Lancaster County

Dear Mr. Wehler:

On April 6, 2010, the Department participated in a public meeting to solicit questions and comments on the Lancaster Brickyard Final Report. The report was submitted by your firm and is currently under review by the Department. The Department must act on this submittal by June 1, 2010, and requests the following questions and comments be addressed in an amended Final Report:

1. Plain Language Summary
 - a. Provide a plain language summary section at a 7th or 8th grade level
 - b. Post the summary on Franklin & Marshall College's website
 - c. Provide the summary in all publicly available copies of the Final Report
2. Groundwater Contamination
 - a. Address who will be responsible for additional cleanup if post remedial care monitoring shows contaminant levels increasing
 - b. Discuss the duration/length of groundwater monitoring
 - c. Are additional monitoring wells necessary down stream?
 - d. Discuss groundwater flow and contaminant transport
 - e. Collect stream samples during each post remedial care groundwater sampling event
3. Discuss the Pennsylvania Natural Diversity Inventory (PNDI) search. Were Bog Turtles identified?
4. Asbestos
 - a. Asbestos was known to have been disposed of in the dump. Discuss what type(s) were found, asbestos content, and what percentage of the waste material removed was asbestos containing material.
 - b. Discuss who the licensed asbestos inspector(s) were, and if they were present during all excavation activities
 - c. Was soil visually inspected prior to excavation for asbestos containing material?

5. Discuss how the partners implemented the Public Involvement Plan during the remediation
6. Drums found during excavation
 - a. Discuss why two samples were collected from the drum contents and the results
 - b. Provide a physical description of the drums (i.e., drums were metal or fiber, intact or leaking, color, etc.)
 - c. Discuss what action(s) were taken when the drums were uncovered
 - d. Provide photos of the drums
 - e. Discuss any evidence of the timeframe of drum disposal into the dump
7. Discuss the overweight trucks that left the site and subsequent corrective action(s)
8. Discuss the use of the excavated material as alternate daily cover

The only written comment the Department has received to date is an April 6, 2010 letter from William J. Cluck (attached). If you have any questions or wish to discuss this in more detail, please contact me at (717) 705-4866 or at khorvath@state.pa.us.

Sincerely,



Kathleen G. Horvath, P.G.
Special Projects Chief
Environmental Cleanup Program

Enclosure: April 6, 2010 letter to Horvath from Law Office of William J. Cluck

cc: Keith Orris, Franklin & Marshall College
William J. Cluck
Dan Gillis, CAARRT