



July 26, 2023

Lisa D. Houser, P.E.
Environmental Engineer Manager
Pennsylvania Department of Environmental Protection
Waste Management Program
Northcentral Regional Office
208 West Third Street, Suite 101
Williamsport, PA 17701-6448

Via UPS Ground & Electronic Mail

RECEIVED

JUL 27 2023

WASTE MANAGEMENT

RE: Supplemental Response to the Department's November 30, 2022 Request for Additional Information Related to the PA Waste, LLC Municipal Solid Waste Application for the Camp Hope Run Landfill Permit No. 101719; APS 944978; AUTH 1189259

Dear Ms. Houser,

Compliance Plus Services, Inc. ("CPS") is pleased to provide the following supplemental submission regarding the Camp Rattlesnake property on behalf of PA Waste, LLC ("PA Waste"), in further response to the Pennsylvania Department of Environmental Protection's ("Department") November 30, 2022 Request for Additional Information ("Request") related to the Camp Hope Run Landfill.

This response supplements PA Waste's initial May 1, 2023 submittal to the Department's Request, which included information with respect to Form E of PA Waste's Permit Application related to the Camp Rattlesnake property. As a preliminary matter, although various access roads are identified on permit drawings (see, e.g., Existing Site Conditions, Sheet 2, Drawing S1 (July 1, 2019)), including to the Camp, the site area itself does not contain any features that clearly identify a specific road, path, or trail as Camp Rattlesnake's "access" leading to the Camp property from Route 153. Instead, the site area contains various unmarked, undeveloped dirt trails and pathways that were abandoned from prior surface mining operations at the site. Given this, PA Waste has approximated a pathway based on the maps and information available that leads across the facility property to the Camp. Although PA Waste's maps included herein label the approximated path as the "Existing Camp Rattlesnake Access Road," PA Waste does not concede that a definitive road or pathway currently exists or that Camp Rattlesnake's property deed defines the "existing access road" mentioned therein.

With respect to its property, Camp Rattlesnake alleged in its appeal of PA Waste's permit (EHB Docket No. 2020-18-L) that access to its property would be blocked following construction of the landfill.¹ To address this allegation, PA Waste has prepared a revised conceptual design of its facility with an amended permit area boundary and dedicated alternate access path that will provide Camp Rattlesnake continuous, uninterrupted access directly from Route 153 to its Camp property. This dedicated access pathway will have the same entrance to the property through the southern

¹ Camp Rattlesnake withdrew its appeal and the EHB did not fully adjudicate this issue.

gate, the same entrance to the Camp property (see in Exhibit 1), and will be outside of the permitted area. Access to the landfill permitted area will be controlled in accordance with the Department's permitting requirements under 25 Pa. Code Chapter 273.

Camp Rattlesnake and the Camp Hope Run facility will effectively have the same ingress/egress from Route 153, as shown in the conceptual Figure 2 depiction that is provided in Exhibit 2 of this submission. Following that short ingress/egress road, the facility will maintain a dedicated gate and primary access road into its site area. Camp Rattlesnake's access will be adjacent to that area but will not be limited by the facility site control features. The dedicated alternate access that would be provided for Camp Rattlesnake follows a path that is similar to one of the surface mining trails previously identified on the July 20, 2019 Drawing No. S1, Existing Site Conditions (labelled on Drawing S1 as "Existing Access Roads"). For the purpose of illustration, we have included as Exhibit 3, a drawing that shows this existing approximated access pathway alongside of the proposed alternative access path.

This new design will mean that the Camp's access to its property will not be impacted or limited by the operation of the landfill – i.e., that Camp Rattlesnake will be in no way landlocked or otherwise prevented from accessing its property through the same property entrances that it currently has.

We look forward to your review of this proposal and any comments that you may have. If this proposal is satisfactory, PA Waste will further evaluate its permit application and will make any necessary revisions. You can contact me at 215-734-1414 or via email at mlogan@complianceplusservices.com.

Sincerely,



Michael D. Logan
Vice President, Environmental Services
Compliance Plus Services, Inc.

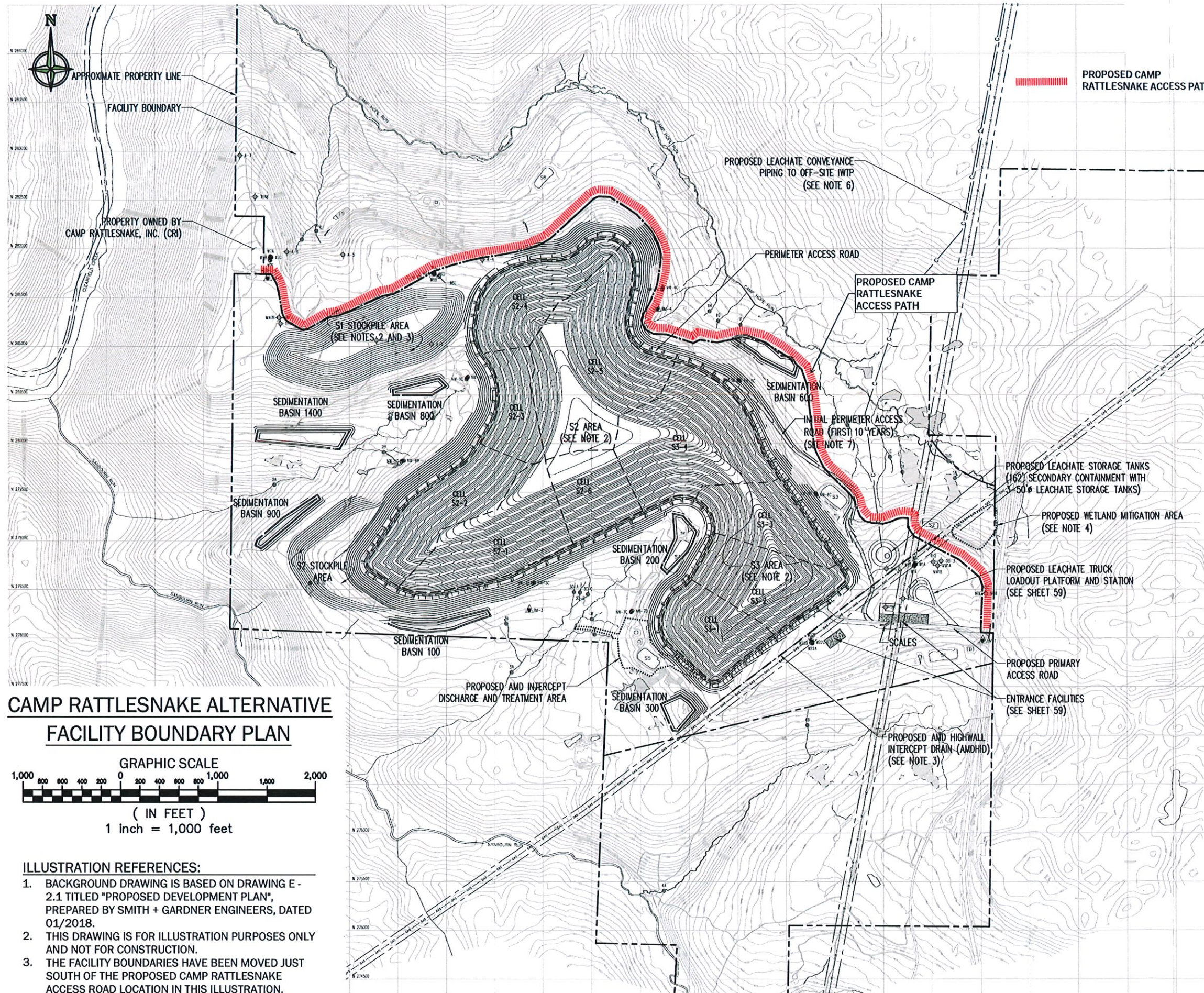
cc: Steven Rovner - PA Waste LLC – (Electronic Copy Only)
Robert Schena, Jr. – Fox Rothschild – (Electronic Copy Only)

N:\LETTERS\7800-7899\7842 - Camp Rattlesnake Proposed Access Road Ltr to PADEP for Supplemental Response.docx

Exhibit 1

*Compliance Plus Services, Inc.'s
Exhibit E-2.1B Camp Rattlesnake
Facility Boundary*

IF THIS SCALE BAR DOES NOT MEASURE 3", THIS DRAWING IS NOT PRINTED TO SCALE



CAMP RATTLESNAKE ALTERNATIVE FACILITY BOUNDARY PLAN

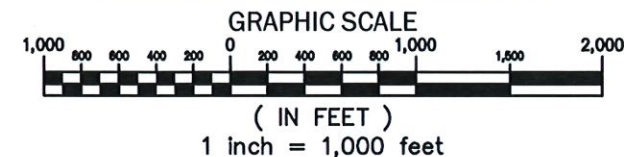


ILLUSTRATION REFERENCES:

1. BACKGROUND DRAWING IS BASED ON DRAWING E-2.1 TITLED "PROPOSED DEVELOPMENT PLAN", PREPARED BY SMITH + GARDNER ENGINEERS, DATED 01/2018.
2. THIS DRAWING IS FOR ILLUSTRATION PURPOSES ONLY AND NOT FOR CONSTRUCTION.
3. THE FACILITY BOUNDARIES HAVE BEEN MOVED JUST SOUTH OF THE PROPOSED CAMP RATTLESNAKE ACCESS ROAD LOCATION IN THIS ILLUSTRATION.

LEGEND	
	EXISTING GROUND CONTOUR (10' INTERVAL)
	PROPERTY LINE
	FACILITY BOUNDARY
	FACILITY LIMIT COINCIDENT WITH PROPERTY LINE
	EXISTING OVERHEAD POWER TRANSMISSION LINE
	EXISTING GAS LINE
	RIGHT OF WAY
	AMD HIGHWALL INTERCEPT DRAIN
	LEACHATE CONVEYANCE PIPING
	BOREHOLE LOCATION
	COREHOLE LOCATION
	MACRONVERTEBRATE SAMPLING LOCATION
	MONITORING WELL INSTALLED AS PART OF THE SURFACE MINE ACTIVITIES
	MONITORING WELL INSTALLED AS PART OF THE LANDFILL PERMIT APPLICATION INVESTIGATION
	INVESTIGATIVE WELLS (APRIL 2014, MEISER & EARL)
	BENCHMARK - TO BE ESTABLISHED
	SURFACE WATER IMPOUNDMENT
	SEDIMENT BASIN FROM FORMER MINING OPERATIONS
	TREATMENT BASIN FROM FORMER MINING OPERATIONS
	STREAM
	COAL CROPS
	GEOLOGIC FAULT LINE (APPROXIMATE)
	AREA OF FORMER STRIP MINE
	"MIDDLE AND LOWER KITTANNING" FORMATIONS (ALLEGHENY GROUP)
	CLARION FORMATION (ALLEGHENY GROUP)
	MERCER FORMATION (POTTSVILLE GROUP)
	CONNOQUENESS-POCONO FORMATIONS (UNDIVIDED)
	PREVIOUSLY DELINEATED WETLAND (SEE REFERENCE 4)
	DELINEATED WETLAND VERIFIED 2012 REVIEWED WITH THE ARMY CORPS OF ENGINEERS (SEE REFERENCE 5)

NOTES:

1. THE PROPOSED DEVELOPMENT AREA IS DIVIDED INTO THREE PRIMARY AREAS AS A FUNCTION OF THEIR EXISTING CONDITIONS AND PROPOSED USE. AREA S1 IS CURRENTLY UNDEVELOPED WITH ONLY LIMITED PRIOR SURFACE MINING AND IS INTENDED FOR PERMANENT SOIL/ROCK STOCKPILING; AREA S2 IS UNDEVELOPED AND IS PLANNED FOR WASTE DISPOSAL CONSTRUCTION/OPERATION AND SOIL/ROCK STOCKPILING; AND AREA S3 IS PRESENTLY A RECLAIMED SURFACE MINED AREA PLANNED FOR WASTE DISPOSAL CONSTRUCTION/OPERATION.
2. THE PHASE S3 AREA IS A PREVIOUSLY SURFACE MINED AREA (LOWER KITTANNING COAL) THAT WAS RECLAIMED TO ITS CURRENT CONDITION AS APPROXIMATE ORIGINAL CONTOUR. THE PHASE S2 AREA HAS HAD NO PRIOR SURFACE MINING. THE S1 AREA HAS HAD ONLY LIMITED PREVIOUS SURFACE MINING AS SHOWN ON SHEET 2.
3. THE ACTUAL AND HIGHWALL INTERCEPT DRAIN LOCATION WILL VARY AS A FUNCTION OF THE ACTUAL TOE-OF-HIGHWALL LOCATION ENCOUNTERED IN THE FIELD AT THE TIME OF THE WORK.
4. AT THE TIME OF THIS APPLICATION THESE AREAS ARE PROPOSED FOR MITIGATION OF DIRECT AND SECONDARY WETLAND IMPACTS. THE ACTUAL, FINAL MITIGATION APPROVED BY BOTH DEP AND THE ARMY CORPS OF ENGINEERS MAY VARY FROM WHAT IS SHOWN HERE.
5. THIS FACILITY DISCHARGE IS BEING SEPARATELY PERMITTED THROUGH AN NPDES PROCESS WITH DEP, CLEAN WATER PROGRAM (DRAFT PERMIT ISSUED 5/31/13).
6. THE DISTURBANCE ASSOCIATED WITH THIS PROPOSED CONVEYANCE SYSTEM IS BEING SEPARATELY PERMITTED THROUGH A CHAPTER 102 AND CHAPTER 105 PROCESS WITH DEP, WATERWAYS AND WETLANDS PROGRAM AND THE ARMY CORPS OF ENGINEERS.
7. THIS ACCESS ROAD WILL BE USED AS NEEDED WHILE FORMER MINE SPOIL IN THE S3 AREA IS RE-EXCAVATED AND THE PERIMETER BERM ARE CONSTRUCTED.

REFERENCES:

1. DIGITAL TOPOGRAPHY FOR THE SITE WAS COMPILED FROM AERIAL PHOTOGRAPHY OBTAINED ON DECEMBER 20, 2004, BY MAPMAKER PHOTOGRAMMETRIC SERVICES, ST. ALBANS, VERMONT.
2. TOPOGRAPHY AUGMENTED WITH TOPOGRAPHIC AND CULTURAL INFORMATION FROM U.S.G.S. 7.5 MINUTE CLEH RICHIEY (1993) AND WALLACETON (1993) PA TOPOGRAPHIC QUADRANGLE MAPS.
3. AL HAMILTON CONTRACTING COMPANY, KAUFFMAN OPERATION: EXHIBIT 6.2 ENVIRONMENTAL RESOURCES MAP, REVISED JUNE 1999.
4. PREVIOUSLY DELINEATED WETLAND AND POND LOCATIONS WERE OBTAINED FROM DAMARISCOTTA FIELD WORK AND ARE BASED ON INFORMATION COMPILED IN 2005, AND WETLANDS INSIDE THE DISTURBED AREA WERE ALSO VERIFIED IN 2012 AND REVIEWED BY THE ARMY CORPS OF ENGINEERS.
5. THIS FEATURE WAS DEFINED BY A WETLAND DELINEATION CONDUCTED BY GREEDHORNE & O'MARA, INC., ERIC MCLEARY ECOLOGIST, FROM AUGUST TO DECEMBER 2012, AND REVIEWED BY THE ARMY CORPS OF ENGINEERS.

COMPLIANCE PLUS SERVICES, INC.

240 GIBALTAR ROAD
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www.complianceplus.com

CAMP RATTLESNAKE ALTERNATIVE FACILITY
BOUNDARY PLAN

Boggs Township, Clearfield County, Pennsylvania

Drawing: EXHIBIT E-2.1 B Date: 05/30/2023

Project No: 0403.04
Scale: 1 inch = 100'
Approved By: Bradley J. Cunningham, P.E.
Drawn By: Nathan Jackson

COMPLIANCE PLUS
SERVICES, INC.

Exhibit 2

*Compliance Plus Services, Inc.'s
Construction Plan Figure
Figure 2*

Exhibit 3

*Compliance Plus Services, Inc.'s
E-2.2B Camp Rattlesnake Access Path*

0 1" 2"
IF THIS SCALE BAR DOES NOT MEASURE 3", THIS DRAWING IS NOT PRINTED TO SCALE

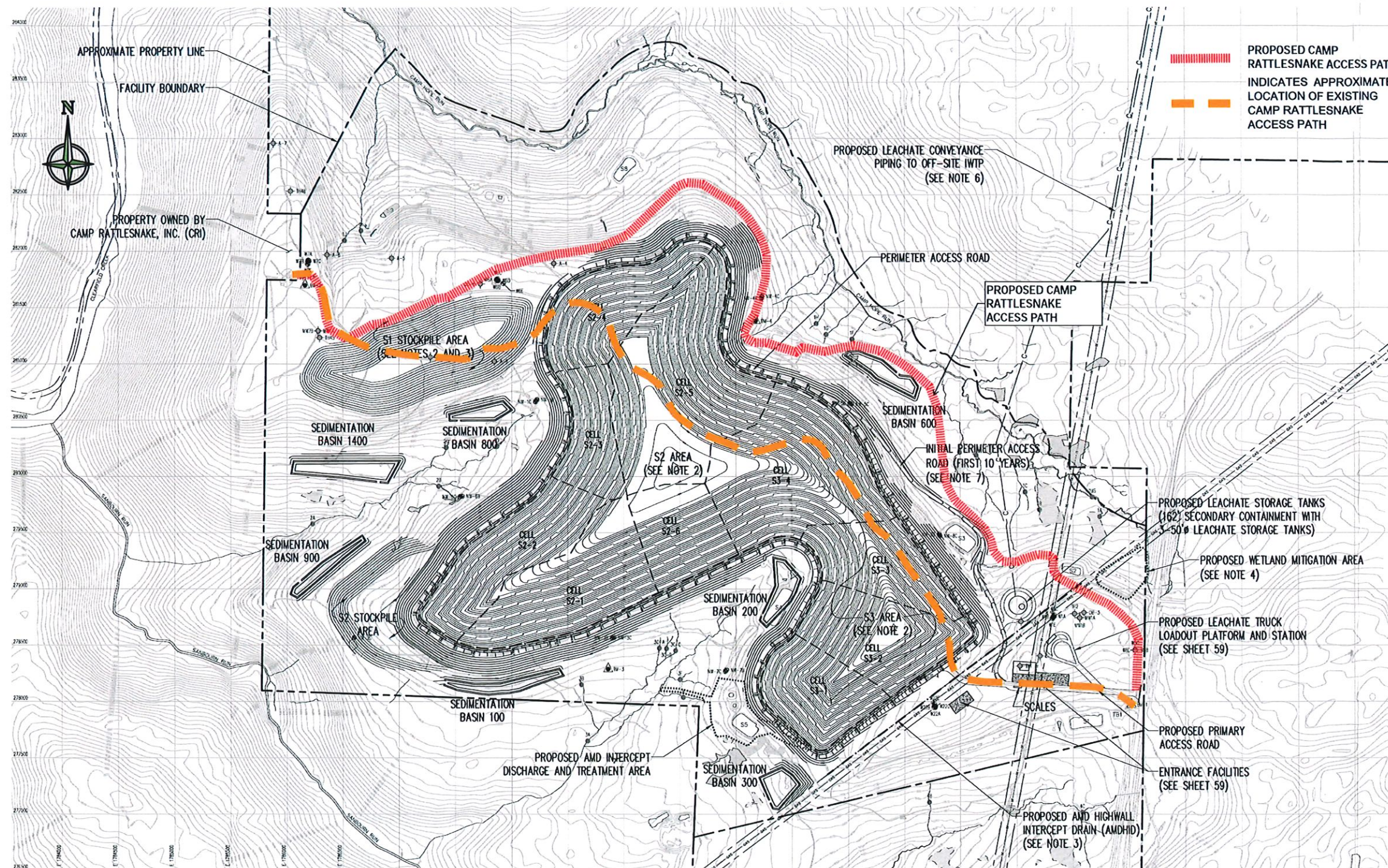
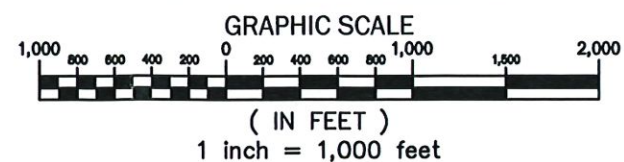


ILLUSTRATION REFERENCES:

1. BACKGROUND DRAWING IS BASED ON DRAWING E - 2.1 TITLED "PROPOSED DEVELOPMENT PLAN", PREPARED BY SMITH + GARDNER ENGINEERS, DATED 01/2018.
2. THE HIGHLIGHTED ACCESS PATH WAS SOURCED FROM THE DEPICTION ON DRAWING S-1 - SHEET 2 TITLED "EXISTING SITE CONDITIONS", PROVIDED BY SMITH + GARDNER ENGINEERS, DATED 01/2018. NO OTHER FIXED MAPPING OR SURVEY DESCRIPTION OF THE PATH WAS AVAILABLE AT THE TIME THIS DRAWING WAS PREPARED.
3. PREVIOUS MINING ACCESS PATHS BASED ON KAUFFMAN NORTH OPERATION EXHIBIT 9 - OPERATIONS MAP.
4. THIS DRAWING IS FOR ILLUSTRATION PURPOSES ONLY AND NOT FOR CONSTRUCTION.

CAMP RATTLESNAKE ALTERNATIVE ACCESS PATH PLAN



LEGEND

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PATH PLAN
Boggs Township, Clearfield County, Pennsylvania
Drawing: EXHIBIT E-2.2 B Date: 05/30/2023