



November 19, 2009

Mr. James E. Miller  
Pennsylvania Department of Environmental Protection  
Environmental Program Manager  
Waste Management Program  
208 West Third Street, Suite 101  
Williamsport, Pennsylvania 17701-6448

Received  
NOV 20 2009  
WASTE MANAGEMENT

Dear Mr. Miller:

Subject: Transmittal  
Revision No. 2 to Residual Waste Permit Application  
Harmony Residual Waste Landfill  
Eagle Environmental II, L.P.  
Chest Township, Clearfield County, Pennsylvania  
APS#645070  
CEC Project 060-205

On behalf of Eagle Environmental II, L.P. (Eagle), Civil & Environmental Consultants, Inc. (CEC) is submitting one original and three copies of the enclosed Revision No. 2 to the Residual Waste Permit Application for Harmony Residual Waste Landfill, located in Chest Township, Clearfield County, Pennsylvania. Revision No. 2 is submitted in response to a Pennsylvania Department of Environmental Protection (DEP) letter dated May 29, 2009,<sup>(1)</sup> wherein the DEP requested additional information concerning the leachate transmission line and overall management of leachate.

Revisions to the permit application forms, narratives, and supporting information are indicated by a single vertical bar in the right margin and a revision date of (Revision 2 November 2009) on the bottom of each page being revised. Additions to the narrative are further noted with a single underline beneath added text, and deletions to the narrative are noted with a single strike through the text. Revisions to the drawings are indicated by a triangle containing the appropriate revision number.

<sup>(1)</sup> Pennsylvania Department of Environmental Protection, "Letter, Eagle Environmental II, L.P., Permit ID #301355, Harmony Residual Waste Landfill, APS#645070, Chest Township, Clearfield County," dated May 29, 2009.

### Civil & Environmental Consultants, Inc.

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Mr. James E. Miller  
CEC Project 060-205  
Page 2  
November 19, 2009



Instructions for inserting revisions into the existing Residual Waste Permit Application are provided with this response letter. However, CEC personnel will make the revision insertions into the DEP's copies upon request. CEC will also schedule appointments with Clearfield County and Chest Township to insert the revisions into their copies of the application.

The DEP's comments are provided below in **bold type**, followed by Eagle's response.

**COMMENT NO. 1**

**In Form 17R – Leachate Management, the application states that the leachate from this proposed landfill would be treated by an off-site publicly owned treatment works (POTW). This POTW is owned and operated by Westover Borough. During the May 7, 2009 public meeting that was held to discuss the Harms and Benefits related to the project, there was a question asked in regard to the leachate treatment. At that time, your consultant indicated that there is currently no signed agreement between Eagle Environmental II, L.P. (Eagle) and Westover Borough that provides for the landfill's leachate to be treated there. A review of Form 17R confirmed this to be true. In light of this fact the application contains an incomplete Form 17R. In order for the Department to proceed with the review of the Environmental Assessment, this issue must be resolved.**

**RESPONSE**

On September 8, 2009, Eagle signed an agreement with Westover Borough to allow for discharge of Harmony Residual Waste Landfill leachate to Westover Borough's wastewater treatment facility (WWTF). A copy of the agreement is provided as Exhibit 17R-1.1 to Form 17R of the application. As a consequence of the agreement, Attachment 17R-1 (Leachate Treatment Methods – Narrative) has been revised to reflect the conditions of the agreement.

In preparing this response to comments letter, Eagle revised the design of the leachate transmission line to incorporate combined vacuum/air release valves with associated manholes throughout the pipe alignment. This re-design was necessary to determine more precise locations for these manholes and allow for a determination of their potential environmental impact. Additionally, based on field reconnaissance conducted by CEC on August 3, 2009, the alignment of the transmission line was revised in several locations to account for field observations and GPS-determined locations of wetlands, streams, and terrain. Accordingly, several permit drawings illustrating the leachate transmission line have been revised, and narrative and design calculations provided in Attachment 17R-3

Mr. James E. Miller  
CEC Project 060-205  
Page 3  
November 19, 2009



(Facilities Description), Exhibit 17R-3.1 (Sump to Storage Tanks Pump Sizing Calculations) and Exhibit 17R-3.2 (Storage Tanks to Westover Tie-In Pump Sizing Calculations) have been revised.

### COMMENT NO. 2

**Eagle has submitted a Chapter 105 Joint Permit Application for multiple encroachments upon streams and wetlands. Included in this application is the leachate pipeline. However, the application only evaluates impacts of this leachate pipeline to the property boundary. No evaluation of impacts from the property boundary to the Westover POTW has been included. In order for the Department to proceed with the review of the Environmental Assessment, this issue must be resolved.**

### RESPONSE

An environmental assessment of the portion of the leachate transmission line located between Eagle's property and the Westover Borough WWTF has been performed. The assessment is provided in the Chapter 105/Section 404 Joint Permit Application submitted to DEP's Watershed Management Program. Potential harms resulting from installation and operation of the leachate transmission line, both on and off Eagle's property, and proposed mitigation measures have been added to the Harms and Benefits Evaluation included with this Residual Waste Permit Application. As a consequence of the changes required to incorporate the leachate transmission line's potential harms and mitigation measures, the entire Harms and Benefits Evaluation narrative is being submitted with this response.

In addition to submitting revisions/information in response to the above comments, Eagle is also submitting revised narratives to Attachment 7R-4 (Surface Water Information) and Attachment 7R-5 (Surface Water Quality Data), and additional data for Exhibit 7R-5.1 (Surface Water Data). These components were updated to include monthly/quarterly surface water data generated for Pine Run and its tributaries between October 2008 and July 2009. These data were requested by DEP's Moshannon District Mining Office as a part of the ongoing review of the Bituminous Surface Mine Permit Application.

Mr. James E. Miller  
CEC Project 060-205  
Page 4  
November 19, 2009



CEC trusts these responses and the attached revised sections of the Residual Waste Permit Application are sufficient to respond to the DEP's May 29, 2009 letter. If you have any questions or require additional information, please contact Mr. Mark Harlacker at (717) 243-1692 or me at (724) 327-5200.

Very truly yours,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

A handwritten signature in cursive script, reading 'Eric D. Chiado', is positioned above the typed name.

Eric D. Chiado, P.E.  
Senior Project Manager

EDC/jg  
Attachments

cc: Mark Harlacker  
Bill Neidigh

L-060205.N19/W