

August 24, 2026

Mr. Joseph C. Valenti, President
Waste Reduction, Recycling & Transfer Inc.
2100 Sans Souci Parkway
Hanover Township, PA 18706
Via email: jvalenti101@hotmail.com

Re: Technical Deficiency Letter
Municipal Waste Transfer Station Application for Major Permit Modification
Waste Reduction, Recycling & Transfer Inc.
Application No.: 101600-A261
APS ID No.: 1160009, Auth ID No.: 1565013
Hanover Township, Luzerne County

Dear Mr. Valenti:

The Department of Environmental Protection (DEP) has reviewed the above referenced major permit modification application. The following deficiencies have been identified:

Deficiencies

Form D – Environmental Assessment

1. The drawings included with the application do not appear to show the proposed access road connecting to Dundee Road. Access roads are by definition part of the facility and need to be included in the permit area. Please provide an updated drawing(s) showing the proposed access road and expanded permit area that includes the new access road.
2. The response to Form D Fish, Game, and Plants section indicates a Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review was completed; however, a copy of the PNDI review was not included. Please provide a copy of the PNDI results.
3. For response to Form D Historic/Archaeologic section please utilize the Pennsylvania Archaeologic and Historic Resource Exchange (PA-SHARE) tool and provide a copy of the results.
4. For response to the traffic and zoning sections of Form D, applicant should enter into an arrangement with Hanover Township on a maintenance agreement for Dundee Road and obtain the necessary zoning and construction permits for the new driveway entrance/exit.
5. Please address the following comments made by the PA Department of Transportation (PADOT) on the traffic section of Form D:
 - a. Please provide a trip distribution diagram so PADOT can determine which direction the additional trips are expected to arrive from for the new Dundee access.

- b. There is a proposed fuel station on Dundee Road. As a part of the fuel station, there is proposed to be increased traffic using Dundee Road for the proposed fuel station access. The entering trips from Sans Souci Parkway to Dundee Road will require the study of turn lanes from SR 2002 (Sans Souci Parkway) to Dundee Road and a HCM capacity analysis to ensure the intersection capacity is not reduced. The proposed fuel station is proposing to lengthen the existing right turn lane as far as practical, given the adjacent existing merge from the SR 29 off ramp. The proposed road reconfiguration may change the lane widths, and the availability of a WB left turn lane.

Form I – Soil Erosion and Sedimentation Control

6. This form should be completed for the proposed modifications, to include the proposed access road.

Form L – Contingency Plan for Emergency Procedures and Preparedness, Prevention, and Contingency (PPC) Plan

7. This form was not provided. Please complete and submit a Form L for this modification.
8. Please provide a facility map that includes emergency response equipment such as spill kits, fire extinguishers, and evacuation routes.
9. The PPC Plan Section 1.1, Form A, and maps provided in the Form 5 section are inconsistent in the total site area and permitted area, please keep in mind Comment 1 above as well. Please revise.
10. The PPC Plan Section 1.2 states 500-tpd. Please revise.
11. Section 2.4 of the PPC Plan – Chain of Command only lists Joseph C. Valenti, Operations Manager. Please include an operational chain of command for times when Mr. Valenti is offsite.

Form O – Transfer Facilities

12. Section C.1: No drawings are provided of the proposed access road. As noted in Comments 1 and 4 above, please provide a map with the proposed access road, proof of contact with Hanover Township regarding any requirements for this access road, and proof of satisfaction of PADOT's requests above.
13. Section C.2: Please provide any details regarding E&S controls during the construction of the access road.

Form 5 – Map Requirements

14. No Form 5 was provided. Please complete and submit a Form 5 for this modification.

Bonding Worksheets – Transfer Station

15. Please clarify the date prepared on the Bonding Worksheets and throughout the bonding documentation.
16. Please provide the operational controls that limit the quantity of waste to 500 or 1,500 tons.
17. Please provide quotes to support Items A-2, A-5, and A-7.

18. Please provide calculations to support the provided inflation rate or please utilize the method provided in 25 PA C.s. 271.331(c)7.
 19. Please re-evaluate the total required bond with any adjustments made regarding the above deficiencies.
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You must submit a response fully addressing each of the significant technical deficiencies set forth above within 60 calendar days or the DEP may deny the application.

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to the deficiency, you have the option of asking the DEP to decide based on the information regarding the subject matter of that deficiency that you have already made available. If you choose this option regarding any deficiency, you should explain and justify how your current submission satisfies that deficiency.

Should you have any questions regarding the identified deficiencies, please contact Bradley Lester, E.I.T. at (570) 820-4841 or bralester@pa.gov.

Sincerely,

David F. Matcho

David F. Matcho, P.E.
Environmental Engineering Manager
Waste Management Program

cc: Hanover Township (via email: sguesto@hanovertownship.org)
Luzerne County (via email: dan.reese@luzernecounty.org)
Quad Three Group, Inc. (via email: dfife@quad3.com)