

BUREAU OF WASTE MANAGEMENT

July 11, 2019

CERTIFIED MAIL NO. 7017 1070 0000 6445 3069

Mr. Raymond J. Bologna
Champion Processing, Inc.
P.O. Box 1073
Coraopolis, PA 15108

Re: Technical Deficiencies
Champion Processing, Inc.
APS ID# 981695, General Permit No. WMGR052SW001 (Hydrogeologic
Characterization Work Plan), AUTH ID# 1253239
Robinson Township
Washington County

Dear Mr. Bologna:

The Department of Environmental Protection (DEP) has reviewed the Hydrogeologic Characterization Work Plan (Work Plan) that was submitted in response to Champion Processing Inc.'s (Champion) response to DEP's geologic and hydrogeologic technical comments in its letter dated March 1, 2019, and has determined it to have the following technical deficiencies. Prior to issuance of the permit the following deficiencies must be addressed:

Technical Deficiencies

1. The stated objectives of the Work Plan are to develop a geologic and hydrogeologic understanding of subsurface conditions at the facility and to address Comment No. 7 of DEP's March 1, 2019 letter. The objectives are to 1) identify the presence of site groundwater, 2) identify the regional aquifer to be monitored throughout the life of the facility, and 3) verify that the proposed subgrade elevations will maintain eight feet of separation from the uppermost regional aquifer at the site. Champion claims that these objectives are intended to satisfy the requirements of 25 Pa. Code § 290.301, regarding the water quality monitoring of the proposed site. However, the overall objectives of the Work Plan fail to account for all of the requirements of 25 Pa. Code § 290.302. Champion is reminded that the regulations require a complete and thorough understanding of the surface water configuration and conditions at the site, as well as, determining the subsurface conditions and the potential of monitoring multiple aquifers throughout the life of the facility. Please revise Section 1 of the Work Plan to satisfy the requirements and objectives of Pa. Code 25 §§ 290.301 and 290.302.

2. With regard to Champion's response to Comment No. 7b, it remains DEP's position that the 12 exploratory wells should be screened exclusively in the Pittsburgh Limestone (Upper Casselman Formation) and the two core-borings be exclusively screened in the Connellsville Sandstone. The two core-borings should be advanced to approximately the midpoint within the Connellsville Sandstone, terminated, and the proposed pump tests conducted. The Work Plan calls for well construction to include 2-inch diameter PVC and well screens to range from 10 to 20 feet in length. DEP will approve the 2-inch diameter PVC; however, DEP requires that the screens be limited to 10 feet in length. This length will allow for a more precise measurement of potentiometer surfaces within the aquifers. The locations of the 12 air rotary borings are acceptable. However, based on the areal extent of the proposed activities (nearly a square mile), DEP is requesting two additional core-borings and two additional exploratory wells. One pair should be installed approximately 1,600 feet southeast of EXW-06/CB-01, and the other pair installed 1,600 feet northeast of EXW-06/CB-01. These wells should be installed with same construction specifications as the other rotary and core borings. The basis on which DEP requires this information is 25 Pa. Code §§ 290.301(a) and 290.302(a).
3. As stated in DEP's March 1, 2019 letter, the groundwater elevation contours illustrated on Exhibit: SP-01 appear to be based on the Upper Casselman formation. However, several inaccuracies have been identified on this exhibit. The following list of wells show their corresponding static water levels and designated gradient positions that were used to construct Exhibit: SP-01:
 - a. GWP-IU, 1094.2' feet,
 - b. GWP-2D, 1120.2' feet,
 - c. GWP-3D, 1175.95' feet and,
 - d. GWP-4D, 1124.3' feet.

Exhibit: SP-01 shows that GWP-1U is the designated upgradient well but has the lowest static water level, and GWP-3D is designated as a downgradient well but has the highest static water level. Therefore, DEP reiterates its position that Exhibit: SP-01 presents no reliable basis regarding any interpretations of groundwater flow beneath the site. Champion claims "that the existing groundwater monitoring well network has provided detection monitoring for the coal refuse facility for many years," but concedes that the gradient designations do not match the gradient positions, with no explanation. Champion also states that after the proposed borings are installed the necessary information will be available for an "accurate" depiction of groundwater conditions at the site; therefore, inferring that current data is inaccurate. In the meantime, to avoid confusion, DEP requests that Drawing NO: CS-1 and Exhibit: SP-01 be revised to eliminate Groundwater Table Lines and Groundwater Elevation Contours until new and "accurate" data is obtained.

4. Based on information submitted by Champion, the Work Plan lacks a comprehensive surface water characterization plan in accordance with 25 Pa. Code § 290.302(a)(3). The following surface water locations – SWP-A, B, C, D, F, G and H, which Champion states

are downgradient of the proposed site. However, according to Exhibit: SP-01, there appears to be numerous potential spring, seep and surface water locations that need sampled and characterized on unnamed tributaries (UNT) C, D, E and F, as well as an upstream sampling location on UNT A. In addition, there are at least 10 surface water impoundments/ponds identified on Exhibit: SP-01 that need sampled and characterized. Also, the map legend for Exhibit: SP-01 denotes existing drainage channels on the site in black, but the map shows drainage channels in black and orange. DEP needs to know the status and purpose of all surface water conveyance structures at the proposed site (convey storm water, leachate, seeps, springs, surface water or a combination). Once identified, both Exhibit NO: 1 and the Work Plan must be appropriately revised to outline the method by which Champion will conduct a thorough seep, spring, and surface water survey of the proposed disposal site and adjacent areas.

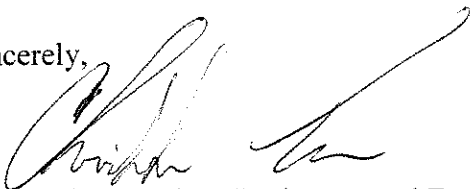
5. The permit application lacks the required 12 minimum background samples and analytical data that is required for all installed monitoring wells and all identified surface water locations in accordance with 25 Pa Code §§ 290.301(b)(2), (e) and (f). Please revise the Work Plan and application to include the required data.

You must submit a response fully addressing each of the significant technical deficiencies stated above by October 4, 2019, or DEP may deny the application.

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be denied.

Should you have any questions regarding the identified deficiencies, please contact Christopher Tersine by phone at 717.787.6755 or via email at ctersine@pa.gov, and refer to Application No. 981695, Authorization No. 262882, to discuss your concerns or schedule a meeting. The meeting must be scheduled by October 4, 2019, unless otherwise extended by DEP.

Sincerely,



Christopher Tersine, Environmental Engineer
Division of Municipal and Residual Waste