



September 19, 2019

**CERTIFIED MAIL NO.** 7005 1820 0007 4204 4741

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 revised Hydrogeologic Characterization Work Plan (Work Plan) that was submitted with the Response to Technical deficiencies on August 12, 2019, and received by the Department on August 13, 2019, in response to DEP's geologic and hydrogeologic technical comments in its letter dated March 1, 2019, and July 11, 2019. DEP has determined it to have the following technical deficiencies, which must be addressed prior to issuance of the permit:

### **Technical Deficiencies**

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1. DEP's March 1, 2019 technical review letter requested that two additional core borings and two additional exploratory wells be installed. One pair were to be installed approximately 1,600 feet southeast of EXW-06/CB-01 and the other pair installed 1,600 feet northeast of EXW06/CB-01. According to Exhibit SP-01, proposed borings EXMW-13 and CB-02 have been located correctly. However, proposed borings EXMW-4 and CB-03 have been located northwest of EXMW-06/CB-01 instead of northeast. Please revise Exhibit SP-01 to relocate EXMW-4/CB-03 to DEP's requested location.
2. Based on the information submitted by Champion, the Work Plan continues to lack a comprehensive surface water characterization plan in accordance with 25 Pa. Code § 290.302(a)(3). DEP notes that there are numerous surface water impoundments/ponds identified on Exhibit SP-01 that need to be sampled and characterized. In its response dated August 12, 2019, Champion stated that "it does not appear relevant" to characterize these surface water points (except for Pond 5), as these impoundments/ponds are existing

stormwater collection ponds and all are directed to a single point where the water is treated and discharged. DEP observes that these ponds also collect runoff from the coal refuse area which, by regulatory definition, characterizes Ponds 1 through 6 to be as separate leachate impoundments. DEP reminds Champion that the objective of WMGR052 is to beneficially use coal ash to cover the exposed coal refuse to improve environmental conditions at the site and surrounding area. Therefore, DEP views the water quality characterization of these ponds to be extremely relevant to Champion's beneficial use activities. Monitoring of these ponds provide the opportunity to collect data that will indicate whether the use of coal ash is producing a demonstrable beneficial effect on groundwater/surface water quality at the site. Therefore, the water in Ponds 1, 1A, 2, 3, 4 and 6 must be sampled and characterized in accordance with 25 Pa. Code §§ 290.301(b)(2)(e), (f) and (i), and § 290.302(a)(3). Please revise Exhibit SP-01 to identify Ponds 1, 1A, 2, 3, 4 and 6, and revise the Work Plan to include sampling and characterization of these surface water points in accordance with 25 Pa. Code §§ 290.301(b)(2)(e), (f) and (i), and § 290.302(a)(3).

3. DEP has identified 18 additional springs, seeps, and ponds on, or adjacent to, the proposed permit area, some of which have been visibly impacted by past coal refuse disposal activities. The following list of surface water points (listed by longitude and latitude) must be identified on Exhibit SP-01, sampled and characterized in accordance with 25 Pa. Code §§ 290.301(b)(2)(e), (f) and (i), and §§ 290.302(a)(3).
  - a) 40° 25' 14.23" N, 80° 18' 50.55" W
  - b) 40° 25' 18.53" N, 80° 18' 50.75" W
  - c) 40° 25' 05.02" N, 80° 18' 48.23" W
  - d) 40° 25' 04.87" N, 80° 18' 42.31" W
  - e) 40° 25' 16.79" N, 80° 18' 27.90" W
  - f) 40° 25' 23.45" N, 80° 18' 22.50" W
  - g) 40° 24' 57.78" N, 80° 17' 26.94" W
  - h) 40° 25' 01.50" N, 80° 17' 14.30" W
  - i) 40° 24' 57.78" N, 80° 17' 26.94" W
  - j) 40° 24' 55.19" N, 80° 17' 17.25" W
  - k) 40° 24' 48.51" N, 80° 17' 25.13" W
  - l) 40° 24' 45.41" N, 80° 17' 19.98" W
  - m) 40° 24' 38.73" N, 80° 17' 21.08" W
  - n) 40° 25' 12.57" N, 80° 18' 13.08" W
  - o) 40° 25' 16.20" N, 80° 18' 15.06" W
  - p) 40° 24' 44.30" N, 80° 18' 12.97" W
  - q) 40° 24' 45.01" N, 80° 18' 07.19" W
  - r) 40° 24' 38.73" N, 80° 17' 21.08" W
4. Based on field observations from DEP, Champion must to revise Exhibit SP-01 to reflect current site conditions. A section of the new Pennsylvania Turnpike intersects the south and southwest portion of the property boundary. As a result, tributaries A and F have been reconfigured and the Exhibit no longer depicts current site conditions.

5. Section 3.1 of the Work Plan discusses site reconnaissance and identification of surface water characterization points. Champion states that particular attention will be directed toward observing changes in the mine spoil overburden that may affect groundwater recharge and discharge patterns within approximately 500 feet of the proposed reclamation area. The Work Plan does not provide adequate detail relating to what “changes” will be of significance to groundwater recharge and discharge patterns. Please revise this section of the Work Plan to outline a list of specific changes in the mine spoil overburden that CEC’s field reconnaissance team would view as noteworthy. In addition, based on the history of this site, DEP is requesting that the observation area be extended 1,000 feet from the proposed reclamation area. Also, please revise the narrative in this section to discuss how detailed surface water reconnaissance will be conducted along the south side of Route 22, the east and west sides of Route 980 and the west side of Candor Road, where these roads parallel the site.
6. In DEP’s March 1, 2019 technical review letter, an issue was raised regarding potential private water supplies along Candor Road. Champion stated that records indicate that the 10 residences bordering the site are connected to public water service and no longer utilize private wells for drinking water. However, Exhibit SP-01 shows a viable drinking water supply on the west side of Candor Road near Pond 1. Please provide data on this well, including construction specifications and sample data in accordance with 25 Pa. Code §§ 290.302(a) and 290.301(b)(2)(e), (f) and (i).
7. DEP’s March 1, 2019 technical review letter requested, pursuant to 49 Pa. Code § 37.59(2), that Drawing CS-1 be stamped by a Licensed Professional Geologist. This deficiency remains unaddressed. Please have Drawing CS-1, as well as Exhibit SP-01, stamped by a Licensed Professional Geologist.
8. DEP acknowledges and approves Champion’s request to submit data gathered through implementation of the Work Plan (once approved) after 6 months of data collection has been performed. DEP may then continue the review of Champion’s response to DEP’s identified technical deficiencies on Champion’s application for coverage under WMGR052 while Champion continues to collect the additional 6 months of data. The additional data must be provided to DEP as an addendum to Champion’s pending application for coverage under WMGR052.

You must submit a response fully addressing each of the significant technical deficiencies stated above by October 29, 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](mailto: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 14, 2019, unless otherwise extended by DEP.

Sincerely,



Christopher Solloway, Chief Permits Section  
Division of Municipal and Residual Waste

bcc: Ali Tarquino Morris  
Christopher Tersine  
Greg Holesh – SWRO  
Denis Strittmatter – SWRO  
Matt Barch – SWRO  
Sharon Hill – CO Mining  
General Permit File  
File

