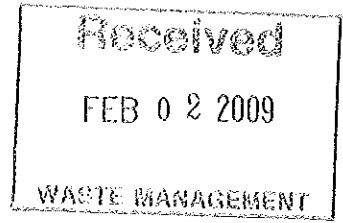




Balanced Environmental Solutions

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January 30, 2009



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

**RE: Administrative Review – Request for Additional Deadline Extension
Ag Lime Biosolids Processing Facility; Permit ID #101695
APS #647453; AUTH #727365
Ag Lime Processing, LLC; Buffalo Township, Union County, PA**

Dear Mr. Miller:

On behalf of Ag Lime Processing, LLC (Applicant), Blazosky Associates, Inc. requested an extension of the Administrative Review for completeness of the Waste Management Permit Application referenced above on October 30, 2008. The initial extension request was made in order for the Applicant to complete modifications on the project in response to the items listed on the administrative incompleteness review correspondence of August 4, 2008. By letter dated November 7, 2008, the Department granted a 90-day extension in response to that request.

This supplemental submission to the application addresses the status of the items noted in the Department's Administrative Review letter. The items discussed in the August 4, 2008 correspondence are summarized in bold italics below, with our responses to each item.

1. Contiguous landowner written waiver from the owner of an occupied dwelling within 300 yards of the proposed facility

At the time of submission of the application, the applicant anticipated securing permission from the landowner to the east of the facility that is within 300 yards of the facility layout proposed at that time. Since that time, it has become apparent that the landowner is not willing to grant a written waiver for the project; therefore, the applicant is modifying the layout of the facility, moving it to the west of its originally proposed location. This relocation will eliminate the need for a written waiver from the landowner.

The applicant subsequently engaged an engineer to complete plans for the building and facility modifications. The modifications were submitted in a revised Land Development Plan application to Buffalo Township. The Buffalo Township Planning Commission reviewed the application at its public meeting on January 26, 2009. The Planning



Commission had minor comments which are being incorporated into the Land Development Plan prior to the township's next regularly scheduled Planning Commission meeting on February 2, 2009. Following final approval by the Planning Commission, the application will be reviewed by the Board of Supervisors. Upon approval of the Land Development Plan by Buffalo Township, a modification to the processing facility application depicting the revised building location will be submitted to the Department for review.

2. Proof of Public Notice

Proof of public notice for the application was performed in accordance with the requirements of 25 PA Code Section 271.141. A notice was published in The Daily Item, Sunbury, Pennsylvania, on June 12, 19, and 26, 2008. Municipal and contiguous landowner notices regarding the application were sent on May 29, 2008. Proof of publication and certified mail receipts for the municipal and contiguous landowner notices are enclosed with this correspondence.

3. Articles of Incorporation

At the time of submission, it was anticipated that the applicant would establish a Limited Liability Corporation with the intended name as listed in the application, Ag Lime Processing LLC. The applicant has since decided to establish a corporation instead. Articles of Incorporation indicating that Ag Lime Processing, Inc. was established on October 28, 2008 are enclosed with this correspondence.

4. Form E Contractual Consent of Landowner

At the time of submission, the Form E had not yet been recorded by the Union County Recorder of Deeds. The Form E has since been recorded on June 2, 2008. Recording documents are enclosed with this correspondence. Note however, that the recorded document was made under the LLC name. The applicant is pursuing having the Form E rerecorded under the name Ag Lime Processing, Inc.

Traffic Study

After an initial review of the traffic study approach route submitted with the application, the Department requested that the traffic study be extended to State Route 15, considered to be the nearest "major highway." Traffic counts were completed on the additional leg of the approach route. The traffic study is being revised and will be included with the supplemental submission discussed above for the building relocation.

Zoning Approval

As discussed in the permit application, Buffalo Township had issued a zoning permit for the project on July 12, 2007. The permit had an expiration date of 12 months following issuance and has therefore expired. The Zoning Administrator for the Central Keystone Council of Governments, William F. Baker, reviewed the Land Development Plan

submitted to Buffalo Township in January, 2009. A comment letter from Mr. Baker dated January 14, 2009 to the Buffalo Township Planning Committee noted a number of items that needed to be added to the plans in order to satisfy zoning requirements. The correspondence also clearly indicated that the project is for an agricultural business and is a permitted use under the current zoning for the project area. Based on this documentation and communications with the zoning administrator, the applicant expects to receive zoning approval once the comments have been incorporated into the Land Development Plan drawings and resubmitted. The zoning approval will be included in a supplemental submission.

The decision to relocate the building has delayed progress, leading to rework and the need to obtain new Township approvals. Despite the delay, significant progress has been made on the items required. In order to allow time for Buffalo Township to complete review of the revised site layout and finalize Land Development and zoning approvals, we respectfully request a further extension to respond to the remaining outstanding items and to revise the application as necessary to incorporate the revisions to the layout of the building and facility for an additional 90 days.

Thank you for your consideration of this extension request. If you have any questions or comments concerning this request, please contact me at (814) 238-2060.

Sincerely,

Blazosky Associates, Inc.



Karen E. Finlan
Project Manager

cc: Daryl Beiler