

June 4, 2019

Robert Rovner
PA Waste, LLC
1785 Bustleton Pike
Feasterville, PA 19053

Re: Pre-denial Letter
PA Waste LLC - Municipal Waste Landfill Application
Camp Hope Run Landfill – Permit # 101719
APS 944978; AUTH 1189259
Boggs Township, Clearfield County

Dear Mr. Rovner:

The Department of Environmental Protection (DEP) has reviewed the response received on April 4, 2019 to the technical deficiency letter (TDL) sent by DEP on November 26, 2018 and has determined that several deficiencies and comments remain unresolved. The deficiencies are based on applicable laws and regulations and pursuant to the Pennsylvania Solid Waste Management Act of July 7, 1980 and the most recent effective version of the Municipal Waste Regulations. Comments that are noted are inconsistencies within the application or items requiring clarification or additional detail. 25 Pa Code §271.201(2) states that “the permit application is complete and accurate.” Revisions and additional information are needed for the application to meet these regulations.

Phase I Deficiencies

Form F – Attachment F-1 (Revised March 2019)

1. Comment: The last sentence on page 1 of 12 states “In this regard, material with <1.0% Total Sulfur excavated from Area S2 will be used for those applications that have the more stringent particle size requirements (i.e. revegetated final and intermediate cover and subbase) whereas the material with <1.0% total sulfur from Area S2 (processed) from the rock/lithic material will be used primarily for structural fill and daily operational cover.” It is unclear as to why this revision was made. It is uncertain as to what this sentence is describing and why % sulfur is discussed in this section. Please revise this section.
2. Comment: The narrative and table on page 5 of 12 do not match. The narrative states 34% is reclaimed mine area whereas the table indicates 32%. Please revise appropriate sections to provide an accurate and consistent application.
3. Comment: Table F-5.7 does not match the tables on pages 2 of 12 and 5 of 12. Please revise all appropriate sections to provide an accurate and consistent application.

Form 6 (Revised March 2019)

4. Comment: On the Overburden Analysis Summary Table 6.2, (also Drawing 14-2.2, Table J-1.3, Figure J-1.6, and Exhibit 24-4.3) hole No. S2-2 and S2-3 indicate that the Lower Kittanning Rider seam (LKr) was encountered but does not list the LKr distance above the bottom of LK. Please clarify and revise all appropriate application sections.

Form 8 - Attachment 8-13 (Revised March 2019)

5. Comment: Response to TDL Comment 5, The Department agrees with the response as stated in the TDL response letter, however there appears to be an error with the insertion of the response on Page 2 of Attachment 8-13. Please revise the second paragraph of the Sampling Monitoring Wells section of Attachment 8-13 to clearly describe the sampling method for wells with limited yield.

Phase II Deficiencies

Form 3 – Phase II Map Requirements [25 Pa Code §273.133]**Sheet 3- Drawing S2: Proposed Development Plan (Revised March 2019)**

6. Deficiency: Proposed benchmark BM-3 is located in a wetland area, proposed for delineation. The wetlands were not present on this drawing previously. It is recommended that the benchmark be relocated to a new location, not in a wetland. If the proposed permanent benchmark is going to stay in this location, this will in turn affect the impacts in the Waterways & Wetlands application and may inevitably require revision. Additionally, all proposed benchmarks must be tied to the proposed grid coordinate system.

Sheet 4 – Drawing S3: Subbase Plan (Revised March 2019)

7. Deficiency: Response to TDL Deficiency 16, The subgrade contours in the S3-1 Area on Drawing S3A (and Drawing S5) do not reflect the partially disturbed area (southern portion of S3-1). Contours on Drawing S3A indicate that the subgrade will be equivalent to the LK structure contour elevation whereas the revised narrative in Form J states that bedrock is not anticipated to be encountered. Please revise Drawings to clearly indicate proposed subgrade contours.

Sheets 17-25 – Drawing X1 to X9: Cross-sections (Revised March 2019)

8. Comment: Response to TDL Deficiency 38, The revised Note 8 (on Drawings X1 through X9) states an incorrect alkaline addition rate. Please revise Note 8 to be consistent with the alkaline addition rate proposed in Attachment 14-2.

Form 14 – Operation Plan: Phase II [25 Pa Code §273, Subchapter C] – Attachment 14-2, Mining Special Material Handling Plan (Revised March 2019)

9. Comment: Response to TDL Comment 80, The revisions in Attachment 14-2 and Figure J-1.6 indicate a zone where the LKr could be encountered but does not describe how this zone was determined. Please revise Attachment 14-2 to include a brief description about how the LKr zone was determined.
10. Comment: Response to TDL Comment 90, The response provided in the TDL response is adequate in regard to limiting exposure of the potentially high sulfur bearing material but was not incorporated into the application narrative. Please revise Attachment 14-2, 3.0 and any other appropriate sections to include suitable portions of the comment response.
11. Deficiency: Response to TDL Deficiency 92, The response provided in the TDL response letter did not include the volume and location of onsite alkaline material storage. Please indicate the location and approximate volume of onsite alkaline material storage and revise all appropriate application sections.

Form J - Soils Information – Phase II – Attachment J-1 (Revised March 2019)

12. Comment: Response to TDL Comment 100, The narrative in Attachment J-1 has not been revised to reflect the revised calculations. Attachment J-1 page 8 of 11 states “the Phase VI non-pod material is in excess of what is required to neutralize the potential acidity, resulting in a Net Neutralization Potential (NNP) of 3.7 tons/thousand tons...” and refers to Exhibit J-1.4. Exhibit J-1.4 was revised to conclude that the NNP of the Phase VI non-pod material is 0.1. Please revise all appropriate sections to provide an accurate and consistent application.
13. Comment: Response to TDL Comment 102, Table J-1.1 has been revised correctly but the same table in Form F revisions (F-5.9) has not been revised. Please revise Table F-5.9.
14. Comment: Sections 3.5 and 3.8 state that the material special handled and placed in the pods equates to approximately 205,119 cy and 205,120 cy respectively. Revised tables J-1.1 and J-1.2 indicate that this value is 203,603 cy. Please revise appropriate sections to provide an accurate and consistent application.
15. Comment: Section 3.8 discusses the volume of materials used to construct the pods and references Table J-1.2. The volumes listed in Section 3.8 do not match the corresponding values on Table J-1.2. Please revise appropriate sections to provide an accurate and consistent application.
16. Comment: Section 3.9 (Sulfur-Bearing Strata in S2) does not correctly describe the current landfill construction plan and refers to 2014 revisions. This application was first submitted in 2017, references to previous applications causes confusion. Please revise section 3.9

(page 9 of 11) to reflect the current landfill construction plans and remove any reference to previous applications.

17. Deficiency: Figure J-1.6 (also Drawing S3B)- Isopatch lines are missing in the area of Geologic Well A9 (Cells S2-1 and S2-3). Please revise all appropriate Figures and Drawings.

Form 24 – Liner System – Phase II [25 Pa Code §273.161 and §273.251 to §273.260] (Revised March 2019)

18. Deficiency: Part V. Properties of Synthetic Liners, page 7; Chemical compatibility testing information was provided for Solmax International 60-mil textured HDPE geomembrane in Exhibit 24-7.4. If it is the applicant's intention to utilize this material in the construction of the liner system, please supply the properties (physical, mechanical, etc.) requested on the page 7 of the Form 24. Additionally, please provide a Manufacturer Specification sheet for the material and add it to Exhibit 24-9.2.

Form 24 – Liner System – Phase II [25 Pa Code §273.161 and §273.251 to §273.260] Attachment 24-2 Technical Specifications (Revised March 2019)

19. Deficiency: Section 02607 – High Density Polyethylene (HDPE) Manholes, Section D. Construction, page 02607-2, item 3b; Please incorporate spark testing procedures for the testing of all welded connections of external pipes to stub-outs from the manholes. Additionally, if spark testing is going to be used on any other appurtenances or geosynthetics (Section 02775 HDPE Geomembrane, subsection D. Construction, item 10. Testing of Boots and Appurtenances) please incorporate testing procedures.
20. Deficiency: Section 02710 Drainage Aggregate (Leachate Management), Section B. Materials, page 02710-3, item 2; This section addresses the “course aggregate from a non-carbonate source (\leq 15% carbonate content by ASTM D3042) shall be placed around the collection pipes and within the sumps (including leachate detection sump) ...”. The course aggregate gradation criteria in item 2c does not meet the design requirement in 25 Pa Code §273.255(b)(2) and a Form Q – Equivalency Review Request was not submitted with the application. Therefore, either the narrative must be changed to delete “(including leachate detection sump)” or a Form Q must be submitted for the proposed use of this material in the detection sump.

Form 24 – Liner System – Phase II [25 Pa Code §273.161 and §273.251 to §273.260] Attachment 24-3 Construction Quality Assurance (CQA) Manual (Revised March 2019)

21. Deficiency: Section 5.0 Geomembrane CQA, Subsection 5.5, 5.5.2-Sumps and Appurtenances, page 33; bullet 2 states that “extreme care is taken while seaming around appurtenances since neither nondestructive nor destructive testing may be feasible in these areas”. The Construction Quality Assurance and Quality Control Plan (CQA/QC) must include “a description of the testing procedures and construction methods proposed to be implemented during construction of the liner system” per 25 Pa Code §273.161(b)(1).

This includes the secondary and primary liner, as well as all appurtenances. Additionally, the liners must “be inspected for uniformity, damage and imperfections during construction and installation” in accordance with 25 Pa Code §273.254(c)(4) and §273.256(c)(3). Please modify the CQA/QC plan to incorporate testing procedures and methodologies to assure that 100% of the liner system is tested.

Form 24 – Liner System – Phase II [25 Pa Code §273.161 and §273.251 to §273.260]
Attachment 24-9 Geosynthetic Specification Sheets (Revised March 2019)

22. Deficiency: Exhibit 24-9.3, LLDPE Geomembranes; Please provide a manufacturer specification sheet for the Solmax LLDPE material if it is the intention of the applicant to propose the use of this material in the cap system.
23. Deficiency: Exhibit 24-9.4, Drainage Geocomposites; Please provide a manufacturer specification sheet for the SKAPS Industries, Transnet 270 and 330 materials and add them to Exhibit 24-9.4 as they are absent.

Form R1 – Waste Analysis and Classification Plan – Attachment R1 [25 Pa Code §271.613]

24. Comment: No response provided to TDL comment 165, Section 2.0 – New Waste Streams, page 4 of 14; All FC-1 submissions, independent of tonnage must be submitted to the Department for review and approval prior to any waste being accepted on site. Please modify the narrative.
25. Comment: No response provided to TDL comment 166, Section 2.0 – New Waste Streams, page 4 of 14; All asbestos containing waste must be submitted through on a Form U to the Department for review and approval prior to any waste being accepted on site. Please modify the narrative.
26. Comment: No response provided to TDL comment 167, Section 2.0 – New Waste Streams, page 4 of 14; All residual waste, independent of volume, must be submitted through on a Form U to the Department for review and approval prior to any waste being accepted on site. All generators are to include a hazardous waste determination. Please modify the narrative.
27. Deficiency: Table 1A and Table 2A; A pH equal to 2 or equal to 12.5 is considered hazardous. Please revise to accept a pH of above 2 or less than 12.5.
28. Comment: Table 1A and 2A; Please justify the acceptance criteria that is being proposed for the following parameters: o-Cresol, m-Cresol, p-Cresol, Cresol, 2,4-D, Methoxychlor, Pentachlorophenol, 2,4,5-Trichlorophenol, Total Oil and Grease or Total Petroleum must be justified on a technical and chemical merit basis. The Department is requesting more information on the determination of these proposed limits.
29. Comment: Table 2A, Page 4 of 7; For Generic Wastes (400), please revise free liquids to be 40% in addition to passing the paint filter test.

Form 28 – Closure/Post-Closure Land Use Plan – [25 Pa Code §273.191, §273.192, §273.321 and §273.322] – Attachment 28-1.1 – Bonding Worksheets (Revised March 2019)

30. Deficiency: Bonding Worksheet B – Cap and Final Cover Placement; Page 3, item 13g equals \$620,662.25. Please revise this line item and subsequently the total.
31. Deficiency: Bonding Worksheet F – Gas Monitoring System; line item 6. Per the references, the number of probes and structure monitoring events per year should be 4. Please revise this line item and subsequently the total.
32. Deficiency: Bonding Worksheet G – Gas Collection System, System installation, page 11; Item 20d equals \$352,000. Please revise this line item and subsequently the total.
33. Deficiency: Bonding Worksheet K – Facility Maintenance Costs
 - a. Item 8.e. equals \$17,504. Please revise this line item and subsequently the subtotal and total.
 - b. Item 14.a equals \$1,257,625.60. Please revise this line item and subsequently the subtotal and total.
34. Deficiency: Bonding Worksheet L – Summary Cost Worksheet; Following revision of the totals on the worksheets, please correct the Summary Cost Worksheet.

Please note as per 25 Pa Code §271.326(a)(2): The operator shall deposit with the Department \$10,000 or 25% of the total amount of bond determined in this subchapter, whichever is greater, in approved collateral prior to issuance of the permit.

Your response should be in the form of revisions to affected pages, forms or drawings in the application. Each revision or addition should bear the revision date and show what items have been revised or added. DEP suggests you use colored paper for page revisions to the application with additions highlighted and deletions lined-out so changes are easily identified. All revised forms must have the title sheet marked with the latest revision date. A revised Page 2 of Form A - Application for Municipal or Residual Waste Permit must be re-signed by the applicant, notarized and marked with the revision date.

You must submit a response fully addressing each of the significant technical deficiencies set forth above within 20 business days of the date of this letter 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 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. 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 me at 570.327.3752 or lhouser@pa.gov and refer to Application No. 944978, Authorization No. 1189259 to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 20-business day period allotted for your reply, unless otherwise extended by DEP.

Sincerely,



Lisa D. Houser, P.E.
Environmental Engineer Manager
Waste Management Program

Cc: Clearfield County Commissioners
Boggs Township Supervisors
Field
File