

June 17, 2016

Mr. John Oren. P.E.  
Permits Chief  
Waste Management Program  
Pennsylvania Department of Environmental Protection  
909 Elmerton Avenue  
Harrisburg, PA 17110-8200

RE: Lancaster County Solid Waste Management Authority response to the Department of Environmental Protection's Second Environmental Assessment letter regarding the Frey Farm Landfill Vertical Expansion.

Dear Mr. Oren:

The Lancaster County Solid Waste Management Authority (LCSWMA) is responding to comments submitted by the Department of Environmental Protection (DEP) in the Second Environmental Assessment letter dated May 5, 2016 regarding the Frey Farm Landfill Vertical Expansion. The following responses parallel the numbered comments in DEP's letter as follows:

**Response to Comment #1:**

LCSWMA, with the assistance of Landscape Architect, Brian Kauffman of Kauffman Engineering, developed a preliminary concept plan to reflect prior and current land use of the area surrounding the Frey Farm Landfill (see Attachment #1). The plan abates visual impacts of the increased height of the landfill through selective, strategic plantings of warm and cool season grasses, thereby creating the appearance of agricultural contour strip cropping across the Frey Farm Vertical Expansion (FFVE). Additionally, areas of potential natural succession create the appearance of a pastoral area. LCSWMA intends to implement this concept plan incrementally, as the vertical expansion progresses contingent upon approval by DEP.

**Response to Comment #2:**

LCSWMA recognizes the wind turbines, adjacent to the Frey Farm Landfill, have a significant visual impact. LCSWMA contends this visual impact is no different than large transmission powerlines or large industrial facilities, such as the neighboring site where the Turkey Hill Dairy production facility resides.

As stated above (see Response to Comment #1), LCSWMA developed an initial visual impact concept to address the aesthetics of the FFVE.

**Response to Comment #3:**

LCSWMA reviewed the pictures and commentary provided by J. Dwight Yoder, Esq. related to his interpretation of the line of sight study and related visual impacts. All lenses distort as the distance increases from the focus (center of the lens). This is a mathematical reality. As it relates to a 55 mm standard lens, as used by Attorney Yoder, this perspective magnifies the image beyond what the natural eye typically observes. Additionally, this type of standard lens does not include perspective related to the surrounding landscape as a wide angle does.

It is LCSWMA's understanding the methods applied by ARM are consistent with methods applied with other permit line of sight studies performed in the Commonwealth. ARM provided details in their response for the lens used on the camera to collect the images provided in the application (see Attachment #6).

**Response to Comment #4:**

LCSWMA purchased, and provided to Manor Township, a radar-based messaging sign to help control vehicle speeds on designated waste hauling routes. Manor Township will take responsibility for utilization of the radar based messaging sign (see Attachment #2) and will comply with the Pennsylvania Department of Transportation (PADOT) requirements for a portable traffic control sign.

LCSWMA obtained clarification on the PADOT signage requirements from PADOT District 8-0 Traffic Engineer, Mr. Jason Bewley, who indicated that a portable sign does not require a sign permit from PADOT. However, Mr. Bewley did specify the sign placement will need to follow guidelines established by Publication 213 for temporary traffic signage. Sign deployment will require three (3) days advance notification to Mr. Bewley from Manor Township prior to placement of the portable sign. The sign shall not remain in one (1) location for more than two (2) weeks.

The messaging sign will be placed along roadways designated for use by waste transporting vehicles within Manor Township. All sign placements will occur on Rt. 441/ River Rd., Rt. 999, and Donnerville Rd. (see Attachment #3).

**Response to Comment #5:**

LCSWMA's Safety Manager, along with LCSWMA Facility Compliance Officers and labor staff, will conduct weekly visual observations of traffic on restricted roads within Manor Township for waste hauling traffic, including Letort Rd., Blue Rock Rd. and Anchor Rd. Additionally, LCSWMA staff will complete an observation form (see Attachment #4), documenting the date and time the inspection was completed along with any offending vehicle information. Written notice of any speeding infractions will

be provided to the operator of the vehicle. A second (2nd) offense by the same vehicle operator will result in a thirty (30) minute delay time penalty, and forwarding of information to the Manor Township police. A third (3rd) offense will result in a one (1) week ban of the vehicle operator from the landfill. A fourth (4th) offense will result in a one (1) year ban of the vehicle operator from the landfill.

LCSWMA's Safety Manager, along with LCSWMA Facility Compliance Officers and labor staff, will conduct daily speed checks utilizing a LCSWMA owned radar gun. Staff will conduct speed checks for a minimum of two (2) hours per day along designated waste hauling routes, this interval may be reduced if automated traffic monitoring systems are applied (ex: driver in cab systems and or speed photo image recording monitoring systems). The date, time, and location of the speed checks will be documented (see Attachment #4), along with the pertinent information for any violators (ex: truck number, license number, and driver name).

**Response to Comment #6:**

LCSWMA will distribute biannually (January 2<sup>nd</sup> and July 1<sup>st</sup>) an information packet to all waste haulers using LCSWMA Facilities, which will provide details of allowable haul routes to access LCSWMA Facilities, posted speed limits on these roadways and highlight, safety related concerns along the designated roads. Facility scale attendants will distribute this packet to any new drivers they encounter during the year. Copies will also be available to waste hauling companies using LCSWMA facilities to distribute to new drivers during their new employee orientation. Written notice of any infractions to designated haul routes will be provided to the vehicle owner. A second (2nd) infraction by the same vehicle operator will result in a thirty (30) minute delay time penalty and forwarding of information to the Manor Township Police. A third (3rd) infraction will result in a one-week ban of the vehicle operator from the landfill. A fourth offense will result in a one-year ban of the vehicle operator from the landfill. (see Attachment #4).

**Response to Comment #7:**

LCSWMA's COO, Robert Zorbaugh, met with the Penn Manor School District Transportation Coordinator, Carolyn Finegan, to discuss the FFVE project and the potential increase in truck traffic. During the meeting, Mr. Zorbaugh reviewed with Ms. Finegan a PowerPoint presentation (see Attachment #5) that included information on the Frey Farm Landfill Vertical Expansion permit application and ADV/MDV increase request. This was the same presentation presented at the LMIP meeting on April 21, 2015.

Penn Manor School District is the only school district that operates school bus service stops along designated landfill haul routes. The Columbia School District does not operate a bus system.

**Response to Comments 8 – 16:**

LCSWMA engaged the services of Kanishka Perera, Ph.D. of HDR Engineering (HDR) and Gerald Ahnell, P.G. of Hydro-Geo Services, Inc. (HGS) to provide second professional opinions related to the FFVE Phase I geologic and seismic concerns raised by Walter M. Leis, Charles K. Scharnberger, and Craig H. Benson, hired by Attorney Yoder to challenge the work done by ARM. Dr. Perera and Mr. Ahnell both reviewed the permit application prepared by ARM. Dr. Perera and Mr. Ahnell also reviewed the reports submitted by Mr. Leis, Mr. Scharnberger, and Mr. Benson as part of the public comment process.

Mr. Ahnell's expert second opinion (see Attachment #7) related to general geology of the FFVE sight condition reaffirms the initial assessment prepared by the ARM Group. In his report, Mr. Ahnell states the geologic conditions are "sufficiently detailed, well organized and more than adequate to satisfy the data needs of the PADEP for this permit modification application" (see Attachment #7, Page #1). Mr. Ahnell's expert second opinion further disputes and discredits the perceived issues raised by Mr. Leis, Mr. Scharnberger, and Mr. Benson related to soil/rock creep, soil water/hydrogeological conditions along the western slope of the FFVE, and changes in the sites hydrogeological conditions from the pre-landfill conditions.

Dr. Perera provided expert second opinion (see Attachment #8) on site seismic risks related to Peak Ground Acceleration (PGA) associated with the FFVE site. Mr. Perera used the deterministic method, incorporating site specific conditions (ex: soils / geologic borings) and location to determine PGA using the Shake 2000 model. The largest local earthquake recorded was 4.6 moment magnitude scale (Mw) in Spring Township, Berks County in 1994. Mr. Perera conducted his analysis using 5 Mw earthquake at 10 km and 6 Mw earthquake at 20 km, which far exceeds any current engineering criteria for the site design. Mr. Perera states in his report, "... use of the 0.1g for geotechnical stability analysis is appropriate" (see Attachment #8, Page #31), which is consistent with ARM FFVE Phase I application.

LCSWMA believes the two additional second professional opinions of Kanishka Perera Ph.D. of HDR and Gerald Ahnell P.G. of HGS related to geologic and seismic site conditions validate the FFVE Phase I application ARM group has developed and submitted. These reports accurately and comprehensively address the incorrect siting concerns raised by Mr. Leis, Mr. Scharnberger, and Mr. Benson. LCSWMA believes any further seismic and geologic stability review should be conducted as part of the Phase II design evaluation.

ARM's response (see Attachment #6) further augments the (2) two second opinion reports related to geologic /seismic concerns as well as comments 17-18 of the DEP Second Environmental Assessment letter.

Please do not hesitate in contacting me if you have any questions or concerns related to our responses to your letter or any other issue related to the Frey Farm Landfill.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "m. d. reider", is written in a cursive style.

Mark D Reider CPSS/SC  
Director of Environmental Compliance

Attachments1-8

cc: Manor Township  
Lancaster County Planning Commission  
ARM Group  
HDR  
HGS Inc.