



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHWEST REGIONAL OFFICE

January 10, 2011

Mr. Victor Gatto
Crawford Renewable Energy, LLC
360 Chestnut Street
Meadville, PA 16335

Re: Technical Deficiency Letter
Determination of Applicability, WMGR038NWD05
Meadville Power Station
Greenwood Township, Crawford County
APS No. 727342, Auth No. 857295

Dear Mr. Gatto:

The Department of Environmental Protection (DEP) has completed a technical review of the referenced Determination of Applicability for General Permit WMGR038. The following technical deficiencies have been identified:

1. A Professional Certification, Form B, must be completed by the Professional Engineer preparing the application.
2. A site drawing depicting the permit area for the facility as defined by §287.1 must be made part of the application.
3. The application should include a statement or statements documenting the permit area for the facility will meet the setback distances identified in General Permit WMGR038, Section C, Condition 21.
4. Proof of a Pennsylvania Natural Diversity Inventory (PNDI) Project Planning Environmental Review was conducted and results of that review should be submitted with the application.
5. The application must identify any impacts the operations may have on local traffic and any measures that will be implemented to minimize this impact.
6. Will a Highway Occupancy Permit be required from PennDOT or Greenwood Township for any of the entrances/exits at the facility?
7. Additional drawings showing the tire processing and tire storage buildings should be included. These drawings should include the general layout of the buildings and equipment, storage areas, floor drains, fire protection systems, and horizontal and vertical dimensions.

8. The Emergency Response Plan lacks sufficient detail. Additional information should be provided for the following:
 - a. Identification of specific emergency equipment.
 - b. Fire suppression systems for all areas tires will be processed and stored: types, locations, functionality, and required water supply (quantity and pressure). Also the submitted control plan identified use of NFPA 850 Standards for fire protection. While this may be appropriate for portions of the electrical generating facility, the Residual Waste Regulations require consistency with NFPA 231D for indoor storage of whole and processed tires.
9. The application should identify the types of railcars that will be used to transport the tires to the facility, the length of time these rail cars may remain loaded and stored on the rail sidings, and the method these railcars will be unloaded.

Your response to these deficiencies 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. Copies of the revisions and instructions are to be sent to the DEP regional office. The requested information should be submitted within 90 days of receipt of this letter.

Upon receipt of your submission, DEP will continue its evaluation of the application. You will be notified later if deficiencies remain in your application and given an opportunity to correct any deficiencies. In accordance with DEP's Money Back Guarantee Program, the clock tracking the elapsed time for completing the review of your application has stopped as of the date of this letter. The clock will restart when you respond.

If you believe the listed deficiencies are not significant, you may ask DEP to review the information you have already submitted. If you choose this option, you should explain and justify how your current submission satisfies the deficiencies noted above. If you fail to respond to this request within 90 days, your application may be denied.

Mr. Victor Gatto

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If you have any questions regarding this letter or would like to schedule a meeting to further discuss this matter, please contact me. This meeting must be scheduled within the 90-day period allotted for your reply, unless otherwise extended by DEP.

Sincerely,



Joel Fair
Environmental Engineer Manager
Waste Management

cc: Crawford County Commissioners
Crawford County Planning
Greenwood Township Supervisors
Mr. William Pfister
NRO
Tracking Log

JF:ls1