



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHWEST REGIONAL OFFICE

March 2, 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 second technical review of the referenced Determination of Applicability for General Permit WMGR038 and the additional information received on February 2, 2011. The following technical deficiencies have been identified:

1. A site drawing depicting the permit area for the facility as defined by §287.1 was provided in the information received February 2, 2011. The permit area was drawn around the tire processing and tire storage areas. Since General Permit WMGR038 authorizes the processing, storage, and the beneficial use of tires as fuel in boilers or other combustion units, the permit area should also include the building containing the combustion units. The submitted map should be revised to include these units.
2. The information provided on the submitted Form HW-C was not sufficient. All of the information required by §287.124 should be submit on or attached to the Form HW-C. This includes information on all partners and officers of the Limited Liability Company, owners of record of surface, subsurface, and contiguous areas, and related parties. The operating agreement or other documentation forming the LLC should be submitted to clearly show who has the legal authority to sign for and commit the company to contracts and agreements. This information will be needed to determine the appropriate signatures for the bonding documents.
3. The current drawings, landowner information, and Form E-GP appear to give conflicting information. Drawings C1.1 and C1.4 indicate the parcels are owned by The Hon Company. The Form E-GP was signed by Victor Gatto indicating Crawford Renewable Energy as the landowner. Please verify the current landowner of record, and any lease agreements or options to buy the property. The Form E-GP should be properly filled out by the existing landowner. If the property later changes ownership, then a new Form E-GP can be submitted.

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4. The Highway Occupancy Permit submitted appears to have expired. A new permit will be required prior to the start of construction activities at this site.


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 45 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 45 days, your application may be denied.

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 45-day period allotted for your reply, unless otherwise extended by DEP.

Sincerely,



Joel Fair
Environmental Engineer Manager
Waste Management

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

JF:jb