



STATEMENT OF BASIS

REGION III
ID # PAD 005
820 691

Seneca Landfill, Inc.
Harmony, Pennsylvania
Signed August 2014

Facility/Unit Type:	Hazardous/Municipal Waste Landfill
Contaminants:	Heavy metals and organic chemicals
Media:	Groundwater and soil
Proposed Remedy:	Continued compliance with the terms and conditions of the PADEP Municipal Solid Waste Operating Permit No. 100403.

I. INTRODUCTION

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis to solicit public comment on its proposed remedy for the Seneca Landfill, Inc. (Facility), formerly known as Vogel Disposal Services, Inc. Seneca Landfill. The Facility is an operating municipal waste landfill (Landfill) which is subject to EPA's Corrective Action program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 et seq.

The Facility is an operating municipal waste landfill subject to Pennsylvania Department of Environmental Protection (PADEP) Municipal Solid Waste Operating Permit No. 100403 (Solid Waste Permit). The Facility's permitting requirements include the operation and maintenance of the groundwater monitoring system, maintenance of landfill caps, operation and maintenance of the leachate collection and treatment system, operation of the gas recovery system and compliance with and maintenance of institutional controls. EPA has determined that all necessary corrective action for the Facility has already been implemented under the PADEP Solid Waste Permit and PADEP-approved RCRA closure plans.

EPA is providing a 30-day public comment period on this Statement of Basis and may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (Final Decision) after the comment period has ended.

Information on the Corrective Action program as well as a fact sheet and the Government Performance and Results Act Environmental Indicator Determinations for the Facility can be found by navigating to <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

The Administrative Record for the Facility contains all documents on which EPA's proposed remedy is based. See Section VIII for information on how you may review the Administrative Record.

II. FACILITY BACKGROUND

The Facility is located on Hartman Road in Lancaster and Jackson Townships, Butler County, PA. It is situated on approximately 268 acres of land just east of Harmony, PA and is surrounded by a mix of industrial property, farm land and wooded land (Figure 1).

The Facility is an active municipal waste disposal facility permitted under the Solid Waste Permit which was initially issued in July 1973 and most recently reissued in October 2011. The Facility is also subject to the post-closure requirements of RCRA under the authorized state hazardous waste program.

The Facility landfill consists of four fill areas as described below. The four landfill areas occupy approximately 100 acres of the Facility. Areas A, B, and C pre-date Area D. Area D overtops part of Area A and all of Areas B and C (Figure 2).

Area A – This area consists of approximately 48 acres of a former surface mining area. It is an unlined, closed, disposal area that received waste until 1990. Both municipal and industrial waste were placed in Area A, including industrial sludges (F019 and K061) that are classified as hazardous waste.

Area B – This area consists of approximately 19 acres. It is an unlined landfill that received waste until 1981. It contains municipal, construction, and industrial waste. A discrete area contains industrial sludges (K061) that are classified as hazardous waste. Area B was previously closed, but the waste is currently being exhumed and relocated to cells within Area D, which is constructed with a double-liner and leachate collection system.

Area C – This area consists of approximately 24 acres of a lined disposal area. It is constructed with a double-liner, leachate collection system. It contains municipal waste and is completely incorporated into the larger, active disposal area, Area D.

Area D – This is the active municipal disposal area. When complete, it will cover approximately 80 acres. It will incorporate all of Area B (after the pre-1981 waste is relocated), and overfill all of Area C and part of Area A. It is constructed with a double-liner, leachate collection system.

III. SUMMARY OF ENVIRONMENTAL HISTORY

The operations at the Facility are regulated by the PADEP under both the hazardous waste program and the solid waste program. The Facility's operating requirements are specified in the Solid Waste Permit. The operating requirements include continued inspection, maintenance, monitoring, and assessment of the landfill caps, groundwater monitoring system, leachate collection and treatment system, and gas recovery system. The Solid Waste Permit also imposes land-use restrictions to prevent exposure to contamination and protect the integrity of the caps, groundwater monitoring systems, leachate collection and treatment system, and gas recovery system. Operations at the Facility are restricted to landfilling operations, inspection, maintenance, and monitoring by authorized personnel.

Area A and Area B were closed under PADEP-approved closure plans, which are incorporated into and enforceable under the Solid Waste Permit.

- Area A was closed in 1990 by covering with a geosynthetic membrane/soil cap or overtopping with the Area D liner system.
- Area B was closed in 1982 by covering with a geosynthetic membrane/soil cap. The closure plan was modified in October 2000 to relocate all of the waste in Area B to new, lined cells of Area D. On October 22, 2001, EPA designated a portion of Area D as an Area of Contamination that may receive the relocated hazardous waste. The waste relocation effort is on-going.

The Facility has a comprehensive groundwater monitoring system for the four landfill areas. The monitoring well network consists of 9 wells; 3 upgradient, 1 side gradient, and 5 downgradient wells. Groundwater is monitored quarterly for indicator parameters, metals and organic compounds.

The groundwater beneath the Facility is contaminated with brines from past oil and gas drilling operations that were conducted near the Facility, and acid mine drainage from past mining operations. Current monitoring results show no organic compounds in the groundwater. Indicator parameters and metals are detected at elevated levels; primarily sodium, chloride, sulfate, iron and manganese. Those parameters are present at elevated levels in both the upgradient and downgradient wells, and are attributed to former oil and gas drilling and coal mining operations near the Facility.

Leachate from the landfill is collected and transported by pipe to an on-site treatment system prior to discharge to Connoquenessing Creek.

IV. STATE OVERSIGHT

The Facility has operated under PADEP (formerly the Pennsylvania Department of Environmental Resources) permitting authorities since 1970. In 1984, EPA granted the Commonwealth of Pennsylvania (Commonwealth) authorization to operate a state hazardous waste program in lieu of the federal program pursuant to Section 3006(b) of RCRA, 42 U.S.C.

Section 6926(b). The PADEP has overseen the operation, environmental monitoring, and closure of the landfill areas at the Facility for over 40 years. PADEP activities include:

- routine inspections and groundwater compliance and monitoring evaluations throughout the operating history of the Facility and during the closure period;
- review of closure plans to determine compliance with permit requirements and oversight of closure construction;
- review of monitoring data to determine compliance with permit requirements;
- review of annual financial assurance cost estimates and mechanisms; and
- evaluation of compliance with land-use restrictions.

PADEP is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains all authority in the Commonwealth for RCRA Corrective Action. EPA has determined that that all necessary corrective action for the Facility has already been implemented under the PADEP Solid Waste Permit.

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. In 2002, EPA determined that there were no unacceptable exposures to contamination at the Facility and that the migration of contaminated groundwater was under control. The environmental indicator determinations are available at www.epa.gov/reg3wcmd/ca/pa.htm. In addition, EPA has reviewed the closure and post-closure measures taken at the Facility under the Solid Waste Permit and RCRA closure plans. On-going groundwater sampling shows that releases from the Facility are controlled by the landfill caps and the leachate collection system.

V. PROPOSED REMEDY

EPA's proposed remedy for the Facility is continued compliance with the terms and conditions of the PADEP Municipal Solid Waste Operating Permit No. 100403.

VI. EVALUATION

EPA has determined the Facility's Solid Waste Permit protects human health and the environment in both the short-term and long-term, and achieves EPA's cleanup objectives at the Facility as long as the necessary operation, maintenance and monitoring activities required by the permit are performed and land and groundwater use restrictions required by the permit are maintained.

VII. FINANCIAL ASSURANCE

EPA is proposing that the financial assurance in place under the Solid Waste Permit, surety bonds in the amount of \$10,774,103, satisfies the financial assurance requirement. In addition, the mechanisms in place under the Solid Waste Permit to evaluate and modify the financial assurance on an annual basis are sufficient.

VIII. PUBLIC PARTICIPATION

Interested persons are invited to comment on EPA's proposed remedy. The public comment period will last 30 calendar days from the date that the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Maureen Essenthier, at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Maureen Essenthier at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed remedy at this Facility. The Administrative Record is available at the following location:

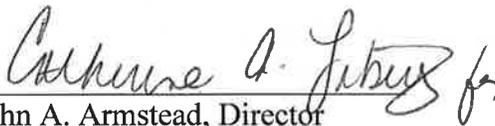
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Maureen Essenthier (3LC30)
Phone: (215) 814-3416
Fax: (215) 814 - 3113
Email: essenthier.maureen@epa.gov

IX. INDEX TO ADMINISTRATIVE RECORD

- PADEP Solid Waste Permit No. 100403, reissued 10/27/2011
 - o including Closure Plans.
- Vogel Disposal Services, Inc. (Seneca Landfill) RCRA Corrective Action Environmental Indicator – Migration of Contaminated Groundwater Under Control, 9/20/2002
- Vogel Disposal Services, Inc. (Seneca Landfill) RCRA Corrective Action Environmental Indicator – Current Human Exposure Under Control, 9/20/2002
- 2013 Municipal Waste Landfill Annual Operation Report, Seneca Landfill, Inc., June 2014
- Annual Groundwater Quality Evaluation, Seneca Landfill (2013), June 2014

- Comprehensive Groundwater Monitoring Evaluation (CME) Inspection Report, PADEP, 10/27/2011
- Existing Waste Relocation Area of Contamination (AOC) approval, EPA letter dated 10/22/2001 (with EPA Fact Sheet and public notice)
- Existing Waste Relocation Plan (Attachment 14-2 of Solid Waste Permit), revised June 2014 (with PADEP 6/26/14 approval letter)
- Groundwater quality data summary, 2000 to 2014
- Leachate Treatment Plant description, PADEP memo dated 8/13/2014

Date: 8-20-14


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