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2021

October 10, 2025

Mr. Tom Decker

DEP Regional Communications Manager

Department of Environmental Protection

230 Chestnut Street

Meadville, PA 16335

Mr. Decker:

In reference to Municipal Waste Landfill Application #101741 (Brockway Transload Station Permit)

Before presenting my concerns about this application and my justifications as to why this application should be denied by PA DEP, I feel it is important to present some overriding issues and ask several questions:

1. Noble Environmental, Inc., through its two subsidiaries, Greentree Rail LLC and Lampwrights LLC, has made clear its intentions. To get DEP to approve this application, while they work to get the Surface Transportation Board to approve the construction of a rail line from the Owens-Corning Crenshaw Plant to the Greentree Landfill. The Brockway Transfer Station would be Phase I and the rail line would be Phase 2.
2. Despite an enormous amount of information, documentation and evidence regarding the extremely detrimental environmental impacts of the proposed rail line, Lampwrights has managed to convince the STB's Office of Environmental Analysis to accept a limited-scope Environmental Analysis, rather than a thorough and complete Environmental Impact Statement. This raises gravely serious concerns about the apparent lack of true concern for what the significant environment impacts will be, and why Lampwrights (Noble Environmental) has been allowed to dodge a thorough environmental study.
3. As this letter and the application further documents, Greentree Rail LLC cannot even answer directly or consistently the question - what type of waste will be handled at the transfer station and subsequently shipped to the landfill. Greentree Rail LLC even addresses the prospect of hazardous waste arriving at the transfer station and the landfill. Hazardous waste should NEVER be a issue. The fact that this could even occur should be alarming.
4. However, even if the waste that ultimately ends up at Greentree Landfill is municipal solid waste, the potential for hazardous waste being deposited in the landfill is still likely. Based on



the almost-non-existent screening of municipal waste in the states that ship waste to Pennsylvania, there will definitely be Household Hazardous Waste (HHW) in those shipments. And while the presence of non-household Universal Waste (UW) may be screened a little more thoroughly in those states, there is substantial evidence that “municipal solid waste including commercial waste” being shipped to Pennsylvania contains varying levels of hazardous waste. It will end up in Greentree Landfill.

5. Based on all of these factors, not the least of which is the ineffective management of hazardous waste by the waste management stream including Noble Environmental, Inc. – and given that Greentree Landfill wants to double the current daily tonnage received, increasing even more the potential for water and soil contamination, I have two questions:
 - a. Since I assume this would have been a top priority of the Department, what are the results of any and all core samples that DEP has conducted or has record of at the Greentree Landfill site, and specifically, at the water level of the Little Toby Creek? State, community and private resources have spent the last several decades cleaning up the contamination of Little Toby and restoring it to the pristine cold water fish (CWF) waterway that it is today.
 - b. What records exist of efforts that the Department has undertaken to protect this community from what could easily become a massive environmental disaster?

With that overview, here are specific concerns that I have about the application in question:

I am deeply concerned about the inconsistencies, but mostly the misleading, inaccurate and deceptive information that has been provided by Greentree Rail LLC in its permit application.

There are a number of inconsistencies contained within the application to DEP, pertaining to what types of waste would be shipped to the transload station, and therefore, trucked to the Greentree Landfill.

In Attachment D-1 (Narrative Response) (Attachment A)

The Brockway Transload Facility (BTF) is anticipated to transfer sealed, ***solid municipal waste*** from rail to road transport

In Attachment D-1 (L)(2) (see attached) (Attachment B)

The waste stream affected by the county plan documents is ***municipal waste***, as defined in the PaDEP Rules and Regulations. See Form O for more information about waste streams.

Attachment O-1 (2)(b) (Attachment C)

b. Composition:

The transload facility will accept the same waste types as Greentree Landfill, providing the waste can be shipped in sealed containers via rail. Currently, Greentree Landfill has been permitted by the Pennsylvania Department of

Environmental Protection under Solid Waste Disposal Permit 101397 to accept ***municipal waste, construction/demolition waste, municipal waste incinerator ash, and nonhazardous residual wastes; municipal water/wastewater treatment plant sludges, industrial liquid wastes and sludges; friable and nonfriable asbestos; coal ash; tires and certain categories of recyclables, sewage sludge, hospital incinerator ash and other processed infectious waste***

4700-PM-CEE0001 10/2023 (Attachment D)

Application

Page 3

Proposed transfer station to accept containerized ***solid waste*** via rail for offloading and transport to the Greentree Landfill

2540-PM-BWM0357 Rev. 10/2016 (Attachment E)

Page 1

Municipal Waste Transfer Facility X

Therefore, the application contains inconsistent references to what waste will be handled at the transload facility:

Solid waste

Solid municipal waste

Municipal waste

Every form of waste that Greentree Landfill is permitted to accept

This is a serious concern, that the application does not clearly state what waste will be accepted and not accepted at the transfer station.

I am very concerned that the application asks for an explanation of how waste will be handled that Greentree Landfill is not permitted to accept (example – hazardous waste)

Attachment O-1 (5) (Attachment F)

Describe how wastes, not approved by the Department, will be prevented from being accepted at the facility.

Greentree will maintain a close relationship with the waste generators supplying the loaded rail cars to the transload facility, staying informed of the generators' waste streams and informing them of recent changes in solid waste policies. ***The scale operator will review the manifests*** and has the authority to accept or deny the waste. In the event a waste load is rejected, Greentree will coordinate with the shipper to have the load returned to its origin, either by rail or by trucking. Greentree Landfill's Form R1 outlines the procedures for analysis and classification for managing residual wastes through the landfill and identifies wastes that are not approved for acceptance at the facility. No waste analysis of

classification will occur onsite. This transload facility will utilize Greentree Landfill's Waste Analysis and Classification Plan, as all waste delivered to the facility will remain in sealed containers and be transferred directly to Greentree Landfill for disposal.

The reference to the scale operator reviewing the manifests is in bold italics. Since under Federal laws and regulations, manifests are only required to accompany shipments of hazardous waste, it is very concerning that Greentree Rail LLC has a plan in place for how hazardous wastes (which should never reach Greentree Landfill) will be addressed at the landfill. Of even greater concern is that shipments of hazardous waste could actually arrive at the transfer station, and then be unloaded from the trains, loaded onto trucks and trucked along local roadways to the landfill. If hazardous waste actually made it to the transfer station, which it should not, why wouldn't it be flagged and dealt with at the transfer station, rather than creating a more hazardous situation with loading, unloading and shipping it locally by truck?

Throughout the referenced DEP application, Greentree Rail LLC states that it will be shipping sealed waste containers to the transfer station and then trucking them to the Greentree Landfill. Conversely, Lampwrights LLC in its proposal to the Surface Transportation Board indicates that it will only be shipping hermetically sealed intermodal waste shipping containers on its rail line.

Sealed containers and hermetically sealed containers are not the same thing. See Attachments G and H.

Sealed containers do not provide the same level of protection as hermetically sealed containers, and it is to be expected that some degree of odor escape and liquid leaking from sealed containers may/will occur. Greentree Rail LLC indicates numerous times in its proposal that odor and leakage of leachate from the containers is not expected to occur because they are sealed. This is not an accurate representation of the real dangers of sealed containers at the transfer station. Of particular concern would be leakage of toxic leachate, given that there would be no methods of dealing with it at the transfer station, and the potential harm that it could inflict on neighboring waterways, wetlands, etc.

This risk becomes highly elevated considering that the application calls for allowing storage of the containers on site for up to 48 hours.

Throughout its application, Greentree Rail LLC states that **one of its primary intents is to reduce the volume of truck traffic hauling waste to Greentree Landfill**. The application also references the anticipated **maximum daily capacity at the transfer station of being 3000 tons** (50% of Greentree Landfill's maximum daily permitted capacity).

Using data provided by Lampwrights LLC in its Surface Transportation Board filings (see Attachment L, pg. 2), **an average truck capable of transporting intermodal waste shipping**

containers is 20-25 tons. Using this data, if the transfer station would operate at capacity, an additional 120-150 trucks per day would be added to the traffic flow between Brockway and the Greentree Landfill. This is not decreasing truck traffic in the local community. This would be significantly adding to the traffic flow. The application is providing inaccurate and misleading information in this regard.

While Greentree Rail LLC does not specifically mention other states as being the source of the “waste by rail” nature of this application, it does reference “out-of-state” and “surrounding areas”, as being the sources of the waste that would be shipped by rail. See Attachment J “Benefits”.

This is the same premise that Lampwrights LLC has used with the Surface Transportation Board. The information that has been used by Noble Environmental, Inc. and its subsidiary LLCs is deceptive, false and misleading.

I have informed the Office of Environmental Assessment at the Surface Transportation Board as well as Noble Environmental, Inc of numerous false and misleading statements, including but not limited to:

- The majority of out-of-state municipal waste over the last 20-25 years has not come from New York, Massachusetts and Connecticut, **as claimed by Lampwrights.**
 - Massachusetts has not shipped any municipal waste to Greentree since 2021 (and then only a very small amount). Going back to 2003, Massachusetts only shipped 1931 tons of municipal waste to Greentree.
 - Connecticut has not shipped any municipal waste to Greentree since 2020, and virtually none since 2009 (only 360 tons in the last 16 years).
- Lampwrights claims that almost 50% of Greentree’s daily permitted capacity is attributable to municipal waste from New York, Massachusetts and Connecticut.
 - The facts – only 34% of municipal waste to Greentree in the last 5 years is from out-of-state.
 - The facts – **only 7% of Greentree’s daily permitted capacity has come from those states (and 99% of that from New York) during the past 20 years**
- Lampwrights claims that the sole purpose of the proposal to the STB for the rail line is to replace truck traffic with rail service.
 - The facts – **based on historical data from PA DEP, the average daily truck traffic to Greentree from out of state waste is less than 11 trucks a day.**
- In its letter of August 5, 2025 to the OEA, Lampwrights claims that the flow of municipal waste from Northeast states is expected to continue to materially rise.
 - **Fact - Data from PADEP shows that there has been no trend of increase in disposal rates at Greentree from Northeast states to substantiate these**

statements, and there are no waste shipments being received at Greentree from any Northeast states except New York and New Jersey.

The data to refute the unsubstantiated claims by made by Lampwrights – and being used by Greentree Rail LLC to justify the need for the Brockway Transfer Station is all available from the Pennsylvania Department of Environmental Protection – Solid Waste Management Reports.

While this next comment does not specifically address something in this proposal, it is quite concerning that Justin Marks, Attorney for Lampwrights LLC, has had conversations with the Office of Environmental Analysis for the Surface Transportation Board about **THIS** application. The nature of those conversations has not been publicly revealed, but their existence is documented (See Attachment K). Also documented in the same Attachment K is the fact that Attorney Marks provided a copy of this application to the Office of Environmental Analysis, and suggested to that Office that this application might assist them in performing their Federally-mandated environmental review and analysis of Lampwrights' application to the Surface Transportation Board.

While I understand that the Pennsylvania DEP can only take action on the referenced application (#101741), what cannot be overlooked is that this application and the petition for exemption by Lampwrights LLC, a sibling LLC of Greentree Rail LLC, (both subsidiaries of Noble Environmental, Inc.) intending to be formally filed with the Surface Transportation Board, are joined together. As a result, what Greentree Rail LLC has to say in its application to the PA DEP cannot truly be separated from what Lampwrights LLC is saying to the Surface Transportation Board and its Office of Environmental Analysis.

Attachment L, Justin Marks' letter of August 5, 2025 to the Office of Environmental Analysis, clearly indicates that the Brockway Transfer Station application is Noble's plan for expediting waste by rail until the proposed rail line can be constructed.

My concern is that a Federal agency, with completely separate statutory and regulatory requirements than the statutory and regulatory requirements that apply to this application, have been provided with an unapproved application to the PA DEP, with the suggestion that this unapproved application might assist them in their decision making process about a petition that Noble Environmental, Inc. needs to receive approval on in order to "complete their plan" for transporting waste by rail – the Brockway Transfer Station being the "other part of their plan".

Their plan: Phase I – Brockway Transfer Station. Phase II- Construction of a new rail line from the Owen-Illinois Brockway Plant in Crenshaw to the Greentree Landfill.

In my view, Justin Marks, acting on behalf of Lampwrights LLC is attempting to improperly influence the Surface Transportation Board with this DEP permit application, and is thereby "linking" the approval requests for the rail line and the transfer station – in order to improperly influence the decision-making by both the PA DEP and the Surface Transportation Board.

Before I close, I ask once again, what are the results of the core samples that DEP has conducted and/or has record of at the Greentree Landfill site, at the water level of the Little Toby Creek? And secondly, what has the Department done (or what is the Department doing) to protect this community from the potential environmental disaster that could occur if this transfer station application were to be approved.

And on that point, I will end my comments, at least at this time. Lampwrights (Noble) cannot build the rail line without running an integral part of it through my property. I have no intention of allowing them to do so. My property is not for sale. Furthermore, I will not allow them to cause irreparable harm to the church and homeless ministry that are situated on my property.

If you wish to have any further documentation of anything that I have provided in these comments, please don't hesitate to contact me at 814-590-3898 or jwisor@windstream.net

Respectfully,

Bishop Jack Wisor

Cc: Congressman Glenn Thompson
State Senator Cris Dush
State Rep. Mike Armanini
State Rep. Brian Smith
Cynthia Brown, Surface Transportation Board
Danielle Gosselin, Office of Environmental Analysis

ATTACHMENT

A

**GREENTREE RAIL, LLC
BROCKWAY TRANSLOAD FACILITY
TRANSFER STATION PERMIT APPLICATION**

FORM D: ENVIRONMENTAL ASSESSMENT FOR TRANSFER FACILITY

ATTACHMENT D-1: NARRATIVE RESPONSE TO ENVIRONMENTAL ASSESSMENT CRITERIA

Greentree Rail, LLC proposes to operate a solid waste transfer facility in Snyder Township, Jefferson County, Pennsylvania. The Brockway Transload Facility (BTF) is anticipated to transfer sealed, solid municipal waste from rail to road transport. All waste received at the BTF will be transported to the Greentree Landfill. The site is an historic rail siding that has been used to transfer locomotive cargo for over one hundred years. The application proposes the updating and continued use of the siding to support Greentree Landfill.

Exclusionary Area Criteria

The following section identifies and addresses the Exclusionary Area Criteria that are established under 25 PA Code §279.202: Areas where transfer facilities are prohibited.

Responses to the exclusionary area criteria are included in this section regardless of applicability to the proposed project.

25 PA Code §279.202. Areas where transfer facilities are prohibited.

(a) Except for areas that were permitted prior to April 9, 1988, a transfer facility may not be operated as follows:

- (1) Floodplain. In the 100-year floodplain of waters in this Commonwealth, unless the Department approves in the permit a method of protecting the facility from a 100-year flood consistent with the Flood Plain Management Act (32 P. S. § § 679.101—679.601) and the Dam Safety and Encroachments Act (32 P. S. § § 693.1—693.27).***

The transload facility is not within the 100-year floodplain of waters in this Commonwealth. Based on review of the 100-year floodplain limit obtained from the Federal Emergency Management Agency Flood Insurance Rate Mapping and a review of the Pennsylvania Department of Environmental Protection's (PaDEP) eMapPA website at <https://gis.dep.pa.gov/emappa/>, the transload facility permit boundary is not within the 100-year floodplain. The nearest 100-year floodplain is associated with Walburn Run to the east of the permit area and is depicted on the permit drawings as obtained from the Pennsylvania Spatial Data Access (PASDA) site. See the Existing Conditions Drawing Sheet 1 of 2 in the permit drawing set for the nearest floodplain boundary.

(2) Wetland.

- (i) In or within 300 feet of an exceptional value wetland, as defined in § 105.17 (relating to wetlands).***

As determined by the October 2024 (Revised January 2025) delineation report by WHM Group, LLC. (see Attachment D-3), the seven identified wetlands on or connected to the permit area are not exceptional value wetlands. Additionally, since neither Little Toby

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BROCKWAY TRANSLOAD FACILITY
ATTACHMENT D-1: NARRATIVE RESPONSE TO ENVIRONMENTAL ASSESSMENT CRITERIA

- 2. For municipal waste disposal and processing facilities, list the approved municipal, county, regional or state solid waste plans or laws that will be implemented by the proposed facility. Provide the name and telephone number of a contact person from the agency that approved the plan as well as relevant documentation for each plan. List the waste streams that are affected by the planning laws in place where the waste is generated.**

The transload facility will be used to implement approved county plans, similar to the role fulfilled by the Greentree Landfill. Greentree Landfill is also included in several other county plans as either the exclusive, non-exclusive or back-up disposal site. The waste stream affected by the county plan documents is municipal waste, as defined in the PaDEP Rules and Regulations. See Form O for more information about waste streams.

M. Air Quality Impact

- 1. Describe briefly the impacts on ambient air quality. This includes the emissions of volatile organic compounds, toxic air compounds, fugitive particulate emissions and other air pollutants.**

Fugitive dust particulate emissions may be generated during the use of transfer trailers and container handler during day-to-day operations. However, the site consists of hard-packed gravel, and the site will experience minimal daily traffic. It is unlikely that dust generation will be an issue. However, if dust becomes a nuisance at the facility, dust control methods, such as watering the roads, may be implemented as needed.

The waste transferred at this facility will be transported in sealed containers, and will not emit volatile organic compounds, toxic air compounds, fugitive particulate emissions, or other air pollutants.

- 2. Based upon site specific meteorological data describe the prevailing wind direction and speed and describe potential adverse air impacts to the surrounding community.**

Review of 12 months of recent weather data from The Pennsylvania State Climatologist data archive (<https://climate.met.psu.edu/data/>) indicates that the predominant wind direction in the area is from the north and average annual wind speed is approximately 7.5 mph.

Due to the limited potential for the sealed containers to emit odors, operation of the facility is not anticipated to have significant air impacts to the surrounding community.

- 3. Describe the control measures to be taken to mitigate or minimize the potential adverse air impacts which you identify.**

If dust becomes a nuisance at the site, the facility can utilize a water truck or similar dust control method to reduce fugitive dust emissions associated with heavy construction equipment from road truck traffic and other related operations. When necessary, the facility may also augment roadway dust management techniques with the use of PaDEP approved chemical dust suppressants.

ATTACHMENT

C

**GREENTREE RAIL, LLC.
BROCKWAY TRANSLOAD FACILITY
TRANSFER FACILITY PERMIT**

Form O: Transfer Facilities

Attachment O-1: Transfer Facilities Operations Plan

B. OPERATING PLAN

1. Description of general operations of the facility:

The Brockway Transload Facility owned and operated by Greentree Rail, LLC (Greentree) is located on a private road connecting to PA Route 219. Train cars carrying sealed waste containers will enter the site via a rail spur. The waste containers will be unloaded and placed onto waste hauling vehicles and hauled to Greentree Landfill for disposal. Typically, waste containers removed from train cars will be hauled to Greentree Landfill the same day. In unique situations, waste containers may be staged for a period of 48 hours after being offloaded. For example, containers may be staged if the train cars are scheduled to be transported away from the facility, but trucking is not sufficient to haul all containers to the landfill prior to departure. In this instance, the remaining containers will be staged while trucking removed the container in the next 1-2 days. This is not anticipated to occur on a regular basis though.

If loaded containers are staged onsite, staging will not occur within 50' of a property boundary. Sealed empty trailers can also be staged onsite, although empty containers are not required to maintain a 50' setback from property boundaries.

A container handler will be used to unload waste containers from the rail cars, stage them, and load them onto waste hauling vehicles. After the trailer is loaded, it will be hauled to Greentree Landfill located at 635 Toby Road, Kersey PA 15846 facility.

2. Source(s) of Waste

a. Waste Origin:

Waste received by the transload facility will include waste typically received by Greentree Landfill. In-state and out-of-state generating locations may vary depending on the inclusion of this site in additional Solid Waste Management Plans and business contracts with haulers, companies and communities.

b. Composition:

The transload facility will accept the same waste types as Greentree Landfill, providing the waste can be shipped in sealed containers via rail. Currently, Greentree Landfill has been permitted by the Pennsylvania Department of Environmental Protection under Solid Waste Disposal Permit 101397 to accept municipal waste, construction/demolition waste, municipal waste incinerator ash, sewage sludge, hospital incinerator ash and other processed infectious waste,

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Latitude/Longitude Point of Origin	Latitude			Longitude		
	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
	41	14	41.11	78	46	11.67
Horizontal Accuracy Measure	Feet		--or--	Meters		
Horizontal Reference Datum Code	☐ North American Datum of 1927 ☐ North American Datum of 1983 ☐ World Geodetic System of 1984					
Horizontal Collection Method Code						
Reference Point Code						
Altitude	Feet		--or--	Meters		
Altitude Datum Name	☐ The National Geodetic Vertical Datum of 1929 ☐ The North American Vertical Datum of 1988 (NAVD88)					
Altitude (Vertical) Location Datum Collection Method Code						
Geometric Type Code						
Data Collection Date						
Source Map Scale Number	Inch(es)		=	Feet		
	--or--			Centimeter(s)		= Meters

PROJECT INFORMATION

Project Name			
Brockway Transload Facility Permit Application			
Project Description			
Proposed transfer station to accept containerized solid waste via rail for offloading and transport to the Greentree Landfill			
Project Consultant Last Name	First Name	MI	Suffix
Wozinski	Patrick		P.E
Project Consultant Title	Consulting Firm		
Project Manager	BAI Group		
Mailing Address Line 1	Mailing Address Line 2		
366 Walker Drive	Suite 300		
Address Last Line -- City	State	ZIP+4	
State College	PA	16801	
Phone	Ext	FAX	Email Address
814-238-2060		814-238-7123	pwozinski@baigrouppllc.com
Time Schedules	Project Milestone (Optional)		
None proposed			

ATTACHMENT

E



FORM A

APPLICATION FOR MUNICIPAL OR RESIDUAL WASTE PERMIT

This form must be fully and accurately completed. All required information must be typed or legibly printed in the spaces provided herein. Replacement/substitution of or attachment to this form is prohibited. Improperly completed forms may be rejected by the Department, may be considered to be violations of the Department's Rules and Regulations, and may result in assessment of fines and penalties.

SECTION A. APPLICANT IDENTIFIER (Check one of the boxes and identify both)

☐	Owner	Name: Greentree Rail, LLC.	Phone #:
		Address: 6000 Town Center Blvd, Canonsburg, PA 15317	Email:
☒	Operator	Name: Greentree Rail, LLC.	Phone #:
		Address: 6000 Town Center Blvd, Canonsburg, PA 15317	Email:

SECTION B. TYPE OF FACILITY

Municipal Waste Landfill ☐ Construction/Demolition Waste Landfill ☐ Municipal Waste Composting Facility ☐ Municipal Waste Incinerator or Resource Recovery Facility... ☐ Municipal Waste Demonstration Facility ☐ Municipal Waste Transfer Facility ☒ Municipal Waste Processing Facility ☐ Other, Specify ☐	Residual Waste Landfill ☐ Class I ☐ Class II ☐ Class III ☐ Residual Waste Disposal Impoundment Class I ☐ Class II ☐ Residual Waste Composting Facility ☐ Residual Waste Demonstration Facility ☐ Residual Waste Transfer Facility ☐ Residual Waste Incinerator or Other Processing Facility ☐ Residual Waste Agricultural Utilization ☐ Residual Waste Land Reclamation ☐ Oil and Gas Wastewater Storage Impoundment ☐ Other, Specify ☐
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SECTION C. MAP LOCATION

U.S.G.S. Map Location of Facility (attach the map and identify location on the USGS map)

7.5" Map Name Falls Creek, PA

Center of Facility:

Latitude 41 ° 14 ' 41.11 " Longitude 78 ° 46 ' 11.67 "

SECTION D. GENERAL INFORMATION

Number of New Acres Proposed for Permit (Issued) 1 • 82	Number of Acres Proposed for Permit (New) 1 • 82
Total Acres of the Property 11 • 93	
Number of Previously Permitted Acres 0 • 0	Current Permit ID Number(s) <u>pending</u>

ATTACHMENT

F

**GREENTREE RAIL, LLC.
BROCKWAY TRANSLOAD FACILITY
TRANSFER FACILITY PERMIT**

Form O: Transfer Facilities

Attachment O-1: Transfer Facilities Operations Plan

B. OPERATING PLAN

1. Description of general operations of the facility:

The Brockway Transload Facility owned and operated by Greentree Rail, LLC (Greentree) is located on a private road connecting to PA Route 219. Train cars carrying sealed waste containers will enter the site via a rail spur. The waste containers will be unloaded and placed onto waste hauling vehicles and hauled to Greentree Landfill for disposal. Typically, waste containers removed from train cars will be hauled to Greentree Landfill the same day. In unique situations, waste containers may be staged for a period of 48 hours after being offloaded. For example, containers may be staged if the train cars are scheduled to be transported away from the facility, but trucking is not sufficient to haul all containers to the landfill prior to departure. In this instance, the remaining containers will be staged while trucking removed the container in the next 1-2 days. This is not anticipated to occur on a regular basis though.

If loaded containers are staged onsite, staging will not occur within 50' of a property boundary. Sealed empty trailers can also be staged onsite, although empty containers are not required to maintain a 50' setback from property boundaries.

A container handler will be used to unload waste containers from the rail cars, stage them, and load them onto waste hauling vehicles. After the trailer is loaded, it will be hauled to Greentree Landfill located at 635 Toby Road, Kersey PA 15846 facility.

2. Source(s) of Waste

a. Waste Origin:

Waste received by the transload facility will include waste typically received by Greentree Landfill. In-state and out-of-state generating locations may vary depending on the inclusion of this site in additional Solid Waste Management Plans and business contracts with haulers, companies and communities.

b. Composition:

The transload facility will accept the same waste types as Greentree Landfill, providing the waste can be shipped in sealed containers via rail. Currently, Greentree Landfill has been permitted by the Pennsylvania Department of Environmental Protection under Solid Waste Disposal Permit 101397 to accept municipal waste, construction/demolition waste, municipal waste incinerator ash, sewage sludge, hospital incinerator ash and other processed infectious waste,

BROCKWAY TRANSLOAD FACILITY
ATTACHMENT O-1: TRANSFER FACILITIES OPERATIONS PLAN

and nonhazardous residual wastes; municipal water/wastewater treatment plant sludges, industrial liquid wastes and sludges; friable and nonfriable asbestos; coal ash; tires and certain categories of recyclables.

c. Weight or volume:

The Brockway Transload Facility transfer station is being permitted for 3,000 tons per day.

3. Equipment to be Used

- **Railcar Mover**

A railcar mover will be available at the Brockway Transload Facility. The major application of the railcar mover is to move the railcars along the rail spur so they can be unloaded by the container handler.

- **Container Handler**

A container handler will be available at the Brockway Transload Facility. The major application of the container handler is to unload the waste containers from the train cars, move the containers to and from the staging area, and load the containers onto the waste hauling vehicles.

- **Transfer Trucks/Trailers**

Greentree owns a large number of trucks and trailers. The trucks and trailers will be able to haul the sealed containers from the rail shipment.

4. Describe the equipment and procedures for waste measurement:

There will be no scales located at the site. The waste going through the Brockway Transload Facility will be weighed at the scales at Greentree Landfill. Greentree Landfill will maintain separate records pertaining to the quantity and type of waste brought in from the transload facility during each business day.

5. Describe how wastes, not approved by the Department, will be prevented from being accepted at the facility.

Greentree will maintain a close relationship with the waste generators supplying the loaded rail cars to the transload facility, staying informed of the generators' waste streams and informing them of recent changes in solid waste policies. The scale operator will review the manifests and has the authority to accept or deny the waste. In the event a waste load is rejected, Greentree will coordinate with the shipper to have the load returned to its origin, either by rail or by trucking. Greentree Landfill's Form R1 outlines the procedures for analysis and classification for managing residual wastes through the landfill and identifies wastes that are not approved for acceptance at the facility. No waste analysis or classification will occur onsite. This transload facility will utilize Greentree Landfill's Waste Analysis and Classification Plan, as all waste delivered to the facility will remain in sealed containers and be transferred directly to Greentree Landfill for disposal.

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Hermetically sealed intermodal waste containers combine the standardized size and transport versatility of intermodal containers with a leak-proof, airtight seal, typically achieved through peripheral adhesive on lids or specialized sealing mechanisms, to safely contain and transport hazardous, medical, or other special waste. These containers ensure compliance with regulations by preventing leaks and odors and are engineered for durability to withstand the physical stresses of multi-modal transportation, including rail, truck, and ship. 🔗

Key Components & Features:

- **Intermodal Design:** The container's structure is built to standard sizes (like 20-foot or 40-foot ISO standards) allowing it to be moved between different transportation modes (ship, rail, truck) without needing to unload the contents. 🔗
- **Hermetic Seal:** A crucial feature that provides an airtight and liquid-tight enclosure to prevent waste from escaping and to contain odors. 🔗
- **Specialized Lids:** Lids often feature peripheral adhesives, grip mechanisms, or click-to-seal technology to ensure a secure, hermetic seal. 🔗
- **Durability:** These containers are designed to be shock-resistant and withstand extreme temperatures, vibration, and impact to protect the contents during transport. 🔗
- **Waste Containment:** They are engineered for containing hazardous materials, medical waste, laboratory cultures, or other special wastes. 🔗
- **Safety Features:** Equipped with features like side carry handles, stacking capabilities, and corner twist locks for secure handling and transport. 🔗
- **Regulatory Compliance:** The robust construction and seals help facilities meet duty of care requirements and stringent regulations for handling and transporting hazardous materials. 🔗

How They Work:

1. **Waste Loading:** Waste is loaded into the container, ensuring it is properly contained according to its specific waste classification. 🔗
2. **Sealing:** The lid is securely affixed, activating the hermetic seal through its adhesive or locking mechanism, creating a barrier against leaks and odors. 🔗
3. **Intermodal Transfer:** The sealed container is then transported using standard intermodal logistics, moving via ship, train, or truck. 🔗
4. **Final Destination:** The container remains sealed throughout the journey, protecting the cargo until it reaches its final destination for proper disposal or treatment

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Non-hermetically sealed intermodal waste containers are large, reusable freight containers, typically made of metal, used for transporting and storing waste across different modes of transport (ships, trains, trucks) that do not provide a perfectly airtight seal, unlike a "hermetically sealed" container which is designed to be completely sealed. Standard large shipping containers, for example, have door seals that are not hermetic, allowing for some air exchange. 📎

Characteristics and Types:

- **Non-hermetic:** This means the container's door seals and other components may not be perfectly airtight, allowing for minor air or liquid leakage. 📎
- **Intermodal:** They are designed to be moved between different forms of transportation (e.g., ship to train to truck) without the cargo being unloaded and reloaded. 📎
- **Waste Containers:** While intermodal containers are primarily for general cargo, they can be adapted to hold various types of waste, from general waste to more hazardous materials, depending on the specific design and modifications. 📎
- **Bulk or Loose Materials:** Some intermodal containers, like bulk containers, are specifically designed for loose materials such as grains, featuring a top fill and end discharge. 📎

Why They Are Not Hermetically Sealed:

- **Practicality:** A completely hermetic seal on standard shipping containers is difficult to achieve and maintain, especially given their repeated use and potential for small gaps in door seals. 📎
- **Design:** Standard intermodal containers are primarily for durable, often dry, cargo, and a hermetic seal isn't a primary design requirement for general freight. 📎

Considerations for Waste Transport:

- **Waste Type:** The type of waste determines the suitability of a container. Hazardous waste, for example, requires specific, DOT-rated containers designed to contain and prevent leakage. 📎
- **Sealing Methods:** To prevent leaks, waste often needs to be contained within the intermodal container by other means, such as in plastic bags, drums, or other smaller sealed containers, especially for hazardous waste. 📎
- **Regulations:** Regulations from bodies like the Department of Transportation (DOT) dictate the requirements for containers used for hazardous materials, ensuring they are designed to withstand stresses like vibration, impact, and extreme temperatures.

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BROCKWAY TRANSLOAD FACILITY
ATTACHMENT D-2: BENEFITS AND HARMS: ENVIRONMENTAL, SOCIAL AND ECONOMIC

by common herbaceous species that proliferate in wet areas where drainage alterations create hydric conditions in soils that may not normally be hydric. These wetlands lack plant diversity, habitat structure, and standing water. They primarily occur as a consequence of stormwater control features and surface operations or construction activity.

This wetland encroachment will be permitted via a Chapter 105 Joint Permit application and fully mitigated as required by the governing regulatory agency(ies) through construction of additional wetland of equal or greater value and size, or via other approved mitigation methods. Hence, there will be no remaining unmitigated impact to wetlands.

Water Quality: As noted above and unlike typical transfer facilities, this operation will not have the potential to generate wastewater (i.e., leachate) since the waste will be containerized and no rinse water will be produced. Additionally, as discussed above, sediment runoff is not anticipated. Surface water and groundwater quality impact from the facility is therefore not anticipated to occur.

Benefits

Development of the proposed transload facility will result in a number of benefits that will be realized if the facility goes forward. The primary purpose of the facility is to provide more efficient waste transportation options to waste haulers in surrounding areas seeking to dispose of waste at Greentree Landfill. Transfer facilities in general, and use of rail specifically, often present the most efficient method of collecting wastes and transporting them to a disposal facility, resulting in several important benefits described below.

Waste Disposal/Transfer Needs: The facility will provide transfer capacity allowing for the use of rail to transport waste rather than use transfer trailers on public roads. This will address a critical need for more effective waste hauling and reduction of truck transportation from longer distances outside of the immediate area that don't currently have disposal options. This facility will help to ensure the consistent, safe and efficient transfer of municipal and residual waste.

Reduction in Waste Hauling Truck Traffic in the Local Area: Rail hauling into the area to dispose at Greentree Landfill reduces long haul truck transportation that currently travels from Interstate 80 via Route 219 and through downtown Brockway. Since this rail siding is located east of Brockway, transfer trailers from the facility will not be going through downtown but will instead only have a short (approximately 7 miles) haul through mostly rural and industrial areas to the landfill. In addition to less truck traffic in general, this also results in numerous related benefits to the local area including reduction of fuel usage, truck exhaust, wear and tear to roadways, etc., and represents a social benefit to the immediate area.

Further Benefits Through Rail Hauling: In addition to the immediate area, use of rail for a portion of the waste disposing at Greentree represents numerous overall benefits along the route from where the waste is generated and in the collection areas where the waste is loaded on to railcars. Based on the study "Rail Connectivity Needs Assessment" conducted by the Florida Department of Transportation, there are a number of environmental benefits to displacing the receipt of waste by trailer delivery to rail delivery. The first is in the reduction of fuel consumption. According to

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RE: Lampwrights Response to Information Request 1 - Part 1

From Marks, Justin J. <jmarks@ClarkHill.com>

Date Wed 8/6/2025 9:37 AM

To Webster, Elizabeth <Elizabeth.Webster@stb.gov>; Stevens, Karen <Karen.Stevens@stb.gov>

Cc Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Alan Summerville <asummerville@vhb.com>

Thanks Elizabeth. Hi Karen, it is nice to meet you.

I do not have a definitive answer as we are waiting on the consultants and BPRR to provide some information. But I will inquire and see if I can obtain a timeline.

Justin

Justin J. Marks

Attorney at Law

Clark Hill

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jmarks@clarkhill.com | www.clarkhill.com

From: Webster, Elizabeth <Elizabeth.Webster@stb.gov>

Sent: Wednesday, August 6, 2025 9:34 AM

To: Marks, Justin J. <jmarks@ClarkHill.com>; Stevens, Karen <Karen.Stevens@stb.gov>

Cc: Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Alan Summerville <asummerville@vhb.com>

Subject: Re: Lampwrights Response to Information Request 1 - Part 1

EXTERNAL EMAIL: The sender (Elizabeth.Webster@stb.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Thanks, Justin. Just wondering if you have an idea when the rest of the response will be submitted?

Also, I'm adding Karen Stevens here. She will be transitioning to the lead on this project. Could you please include her on future emails (and part 2 Info Request)?

Thanks!
Elizabeth

From: Marks, Justin J. <jmarks@ClarkHill.com>

Sent: Tuesday, August 5, 2025 5:27 PM

To: Webster, Elizabeth <Elizabeth.Webster@stb.gov>

Cc: Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Alan Summerville <asummerville@vhb.com>

Subject: Lampwrights Response to Information Request 1 - Part 1

Elizabeth:

Attached please find a letter from Lampwrights with responses to OEA's Information Request. As discussed on our call last week, this is a partial response. Also – as discussed – on our call, we are providing the application that another Noble entity filed with the PA DEP for a separate (non-common carrier) rail transloading facility in proximity to the Proposed Line.

The application has environmental data that OEA/VHB may find useful in its preparation of the EA for the Proposed Line. I've included a link in the letter, but here it is as well:

<https://www.imanageshare.com/pd/24sMZ42au5t>

Thanks,

Justin

Justin J. Marks

Attorney at Law

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August 5, 2025

Ms. Danielle Gosselin, Director
Ms. Elizabeth Webster
Office of Environmental Analysis
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: STB Docket No. FD 36833 Lampwrights LLC– Construction and Operation
Exemption–In Elk and Jefferson Counties, PA; Partial Response to Information
Request Number 1

Dear Ms. Gosselin and Ms. Webster:

Lampwrights LLC is submitting this letter to partially respond to OEA's Information Request No. 1. OEA's Information Request No. 1 is organized in four sections. This letter will respond to portions of Section 2, Rail Operations and Section 3, Waste-by-Truck Operations. Thank you for your patience as Lampwrights works with its consultants and future rail operator to collect the information request for Sections 1 and 4, and the balance of information requested for Section 2.

2. Rail Operations

- Confirm that the estimated one in-bound train and one empty out-bound train per week would stay consistent for five years after the date of the anticipated year of the issuance of a final decision from the Board.
 - Confirmed
- For the project, provide estimates of the average number of locomotives per train and their length.
 - One locomotive per train. Trains will be at a maximum of 7,000 feet.
- Provide average train speed at each roadway/rail at-grade crossing.
 - Response to be forthcoming in a future response to Information Request No. 1.

- Describe how the interchange of freight rail cars between the Buffalo & Pittsburgh Railroad, Inc. line and the roadbed track would occur around the O-I Crenshaw Glass Plant.
 - Response to be forthcoming in a future response to Information Request No. 1.
 - Describe the anticipated rail operations on the landfill track, including whether it would be used for loading, storage, or switching; who or what entity would be operating the trains and directing operations; and whether all rail operations and commodities carried would be related to the landfill.
 - The landfill track will store empty and loaded cars. A gantry crane or container style forklift will offload the intermodal containers from the flat cars and place said containers on off-road articulated rock trucks. Rock trucks will transport the intermodal containers to the working face (on landfill property) for ultimate disposal at the active working face. Empty containers will be returned to the landfill track and placed back on the flat cars. All rail operations and commodities will be landfill related.
 - Confirm that Lampwrights (or Noble Environmental, LLC, its parent company) owns or intends to own the landfill track and underlying property.
 - A wholly owned subsidiary of Noble Environmental, Inc will own the landfill track and underlying property.
 - Identify the owner of the locomotives and hermetically sealed intermodal containers that would be used to transport waste, as well as any other equipment that would be used on the landfill track.
 - Buffalo and Pittsburgh Railroad will own the associated locomotives. Intermodal containers may be owned by a subsidiary of Noble Environmental and various third parties shipping waste to Greentree Landfill.
 - Describe who or what entity would maintain the landfill track.
 - A wholly owned subsidiary of Noble Environmental will maintain the landfill track.
3. Waste-by-Truck Operations: Describe the waste-by-truck traffic to and from the Greentree Landfill.
- Confirm that there are no anticipated changes in authorized maximum daily volume of waste based on projections five years after the date of the anticipated year of the issuance of a final decision from the Board.
 - There are currently no anticipated changes, however this is subject to change based on landfill operations. Changes to the maximum daily volume accepted at Greentree Landfill are regulated by Pennsylvania Department of Environmental Protection (PADEP). A separate regulatory approval process for an increase in maximum daily volume would be performed.

August 5, 2025

Page 3

- What percentage of the daily landfill truck traffic is local waste and what percentage is long-haul waste? Discuss whether the breakdown of local and long-haul truck traffic is anticipated to change within the next five years.
 - Approximately 50% of landfill volumes are associated with long-haul waste. Given the trend in northeast solid waste movements, Lampwrights believes long-haul waste will continue to materially rise as disposal capacity continues to decrease in the northeast United States.
- What is the average capacity of a local waste truck? What is the average capacity of a long-haul truck?
 - Local Waste Trucks: 10-18 Tons depending on configuration.
 - Long Haul Trucks: 20-25 Tons depending on configuration.
- Confirm that the project would primarily be used to serve long-haul waste and that local waste would continue to be delivered by truck.
 - Confirmed

In addition to the responses provided above, Lampwrights is providing an application filed by Greentree Rail, LLC (another entity in the Noble Environmental corporate family) to the PADEP for Greentree Rail to operate a non-common carrier transloading facility – the Brockway Transload Facility. The Brockway Transload Facility is a separate project from the Proposed Line and it does not fall under Surface Transportation Board jurisdiction.

The Brockway Transload Facility is being developed to facilitate waste-by-rail until construction of the Proposed Line is completed. Lampwrights is providing this application as it contains information that OEA may find useful as it analyzes the environmental impacts of the Proposed Line. Sections of the PADEP application containing personally identifiable information have been redacted.

If you have any questions about this partial response, please let me know.

Sincerely,



Justin J. Marks
Counsel to Lampwrights LLC

Enclosure:

<https://www.imanageshare.com/pd/24sMZ42au5t>