



November 21, 2018

Submitted electronically to coconnolly@pa.gov

Permits Chief, Northeast Regional Office
PA Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18701

Colleen Connelly
Community Relations Coordinator
PA Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18701

Re: Minor Permit Modification Application, Grand Central Sanitary Landfill, Inc., Facility No. 100265, Plainfield Township, Northampton County, PA

Dear Permits Chief and Ms. Connelly,

Delaware Riverkeeper Network submits these comments on the Grand Central Sanitary Landfill (GCSL), Waste Management Permit Modification Application for the proposed Slate Belt Heat Recovery Center (SBHRC). The opportunity for public comment on the application was announced in a Pennsylvania Department of Environmental Protection (PADEP) Newsroom announcement on October 19, 2018.

(https://www.media.pa.gov/Pages/DEP_details.aspx?newsid=1088).

The announcement stated: "Grand Central Landfill is requesting a modification of its existing Waste Management Permit to allow the proposed heat recovery center to be located within the Grand Central Landfill permit boundary. The permit modification application was received by the DEP on March 21, 2018. The application was determined to be administratively complete on March 26, 2018, and is currently under review."

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On March 14, 2018, EarthRes Group, Inc. submitted, on behalf of Grand Central Sanitary Landfill Inc. (GCSL), a minor permit amendment application for the proposed SBHRC. EarthRes described in the application: “The facility will be developed by Slate Belt Heat Recovery Center, LLC on a parcel on GCSL's site within the landfill permit boundary and adjacent to the Green Knight Economic Development Corporation (GKEDC) landfill gas-to-energy plant (LPGTE). The SBHRC facility will beneficially use waste heat from the GKEDC LFGTE facility to dry dewatered biosolids and produce a Class A biosolid product.”

Delaware Riverkeeper Network has several questions and concerns regarding technical completeness. We request that the application be rejected and returned to the applicant as incomplete.

Regarding the application for the permit for the Grand Central Sanitary Landfill (GCSL) Modification to Sediment Basin #2, PADEP states that the permit will cover “...the modification of the existing Sedimentation Basin No. 2 (part of existing GCSL stormwater controls) involving partial filling and relocation of emergency spillway”. Plainfield Township appealed PADEP’s decision regarding the sediment basin, contesting that sediment basin #2 is a properly permitted, engineered stormwater basin in September 2018. Plainfield Township maintained that the agency should require a new permit for the use of the pond as a sediment basin stating that it’s an abandoned quarry pond, not an engineered basin. The proposed filling, relocation, and any other modification of the quarry pond cannot occur until this issue is resolved. Therefore, the application is not technically complete. This waste permit modification should not be considered until this legal matter is resolved.

PADEP states that the permit modification will cover “other earthwork within the GCSL permit area relating to the SBHRC permit area”, that the area to be disturbed for the sludge plant will remain part of the GCSL permit area, and that the related earthwork will be covered by their permit. The disturbance of the 12.05 acres proposed for the sludge plant drains to the Little Bushkill Creek and Waltz Creek, both classified by Pennsylvania as High Quality Cold Water streams, which can degrade their quality both during construction and post-construction during facility activities and operation. This application is not technically complete until the stormwater management system, including the sediment basin, is resolved. Therefore PADEP should not allow any earthwork or disturbance of the 12.05 acre site.

PADEP states that the permit modification will cover “any impacts of the proposed co-located SBHRC industrial activities on GCSL operations (use of common access roads, scales, etc.)”. An enormous amount of trucks carrying sewage sludge and garbage enters and leaves the landfill through the State Rt. 512 entrance every day. Forty truck trips per day are planned to serve the proposed sludge drying plant and another ten truck trips per day to carry the “biosolid” pellets to market, adding to the already heavy truck traffic, a total of 50 total additional truck trips per day, according to the application.

Runoff from the proposed SBHRC truck traffic could contain spilled or leaked hazardous pollutants. This road runoff drains or flows without filtration from the roads into Waltz Creek or Little Bushkill Creek, both High Quality, Cold Water streams protected from degradation by state

regulation. Currently and, increasingly in the future if the SBHRC is permitted, runoff drains and/or flows to Waltz Creek or Little Bushkill Creek, and also is discharged into the abandoned quarry pond (sediment basin #2).

Road runoff typically carries salts from winter and dust control road treatments; sediment, hydrocarbons, Benzene, Toluene, Ethylene, and Xylene (BTEX), and other contaminants; and pollutants deposited to the surface from the routine emissions from diesel powered trucks that use the entrance and roadway. Other pollutants spilled or leaked from the sewage sludge, garbage and other landfill waste being transported in the trucks could also be carried as stormwater into the creeks or the quarry pond from the cumulative day-to-day truck traffic on this roadway and entrance area. How much additional runoff from this new truck traffic will flow to the creeks, what parameters will be monitored for, and how and when will this be monitored? Will the results of sampling be made easily available to the public?

The public is very concerned about the runoff quality and quantity and the impacts this could have on local and regional water resources and ecosystems, making it very important for data to be provided through an accessible on-line reporting system. Information in the application about how water quality degradation will be prevented from the stormwater system used at GCSL and the proposed SBHRC is deficient.

The application for the permit modification also shows that the truck access road runoff drains to the quarry pond (sediment basin #2). The Plainfield Township appeal maintains that the pond is hydraulically connected to groundwater but the application does not explain how the groundwater will be protected. Considered a water body protected by the rules, statutes and regulations of the Waters of the Commonwealth, the pond and the groundwater to which is hydraulically connected would be exposed to pollution and/or contamination by the additional activities of these co-located operations. The application does not explain how the pond and groundwater will be protected and is therefore technically deficient.

The application for the permit modification also proposes changes to the existing erosion and sedimentation plan for the landfill by adding a channel, by reducing the volume of sediment basin #2 and by relocating the inlet storm pipe and emergency spillway of sediment basin #2 (the quarry pond). The use of the quarry pond as a sediment basin is central to all of these changes but is vulnerable to degradation. The proposed filling of the pond that will reduce the volume of the pond jeopardizes the quality of the quarry pond and the groundwater. The Little Bushkill and Waltz Creeks are vulnerable to stormwater being conveyed by channel or spillway.

The public has expressed deep concern about the potential impacts of this project and the modification to the GCSL waste permit required for the SBHRC. How will PADEP provide the required protections to these water resources under Article 1, Section 27 of Pennsylvania Constitution which provides for pure water, clean air, and the preservation of the natural, scenic, historic, and esthetic values of the environment for all people, including generations yet to come?

PADEP should reject the application as technically deficient and not ready for review until the herein discussed issues are fully resolved.

Thank you for the opportunity to comment on the minor permit modification application of the GCSL waste permit.

Submitted by:

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Maya K. van Rossum
the Delaware Riverkeeper
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A handwritten signature in blue ink that reads "Tracy Carluccio". The signature is cursive and somewhat stylized.

Tracy Carluccio
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