



Talking Points and Questions

**“Slate Belt Heat Recovery Center, LLC” (SBHRC) and EarthRes Group, Inc.,
representing Synagro, an application for a Waste Management General Permit “to
process biosolids and produce Class A biosolid products”, a sludge drying facility,
and an application for a “Minor Modification” to the
Grand Central Sanitary Landfill Waste Management Permit
Pen Argyl and Plainfield Township, Northampton County, PA**

- The sludge: Will only pre-treated sludge be delivered to the site or will raw sludge also be delivered? Will each load of sludge be sampled for its content and will the data be posted publicly? Will any sludge be stored on site prior to processing?
- Truck traffic: 40 truck trips per day to deliver 400 wet tons, 84 dry tons of sludge. Is there a photograph of these trucks available with their capacity specifications? Will these trucks be counted and will they be distinguished from the trucks bringing sludge to the landfill? How will emissions from the diesel trucks be monitored? Where will they park while waiting? It's stated SR 512 will be used for both incoming and outgoing trucks. How will this traffic be coordinated with landfill traffic? Are the “directions” in the application the route that will be used by all trucks? Has there been a traffic impact study and analysis of accident likelihood? Will PADEP require this?
- The “product”: The two storage silos for the finished “Class A Product” - dry pellets sold as fertilizer or used in industrial heating or as a filler – will be opened from the bottom to fill trucks and can be a source of offensive odor. How will odors be controlled? There are supposed to be 10 truck trips per day to remove the product – will there be an enforced limit on truck traffic?
- Wastewater: A storage tank on site will hold 300,000 gallons collected from various processes. What is the volume expected from each source? There is no identified destination for the concentrated wastewater that will be produced and trucked away. We know that 40 truck trips of sludge delivery per day is supposed to include the removal of wastewater but the projected volume of wastewater is not disclosed. Precisely what facilities will receive this waste and how much of it will be trucked away each day, including

the volume capacity of each tanker truck? It's stated that the wastewater will be loaded onto trucks at an unenclosed filling area with "containment" and that the trucks may also be washed there; process wastewater is identified as a source of odor. How will odors, fumes and pests be controlled from this open area and will there be secondary containment? Will wastewater be sampled prior to leaving the site and if so, where will sample data be posted for the public? Is there a photograph of the type of truck that will be used?

- Sludge Offloading: Trucks are supposed to back into a "covered" receiving unit which is opened at the top for delivery. Sludge emits odors and possible fumes. How many hours each day will the enclosure be open for offloading and how will odors and pests such as flies be controlled while the facility roof is open?
- Heat: Although supposed to use "primarily waste heat", a supplemental "oil heater" will also be used that burns natural gas. Exactly how much heat will be from the landfill and how much from gas over the life of the project? What type of oil will be used in the heating system?
- Chemical Compounds: Sulfuric Acid and Sodium Hydroxide will be stored and used in processing. Sulfuric Acid can cause irritation to eyes, skin, nose, throat; pulmonary edema, bronchitis; emphysema; conjunctivitis; stomatis; dental erosion; eye, skin burns; dermatitis (<https://www.cdc.gov/niosh/npg/npgd0577.html>) The International Agency for Research on Cancer (IARC) has classified strong inorganic acid mists containing sulfuric acid as a known human carcinogen. (<https://bit.ly/2zqNgeN>) Sodium hydroxide causes eye and skin burns, digestive and respiratory tract burns. (<http://www.certified-lye.com/MSDS-Lye.pdf>) What concentration of sulfuric acid will be used, how will these chemicals be controlled within and outside of the facility and how much will be stored, used and disposed each day?
- The operation: It's stated that the facility will operate 24/7 and truck traffic will operate Monday-Saturday, 6am to 6pm. It's also stated that Synagro has "successfully operated for 20 years" in "populated areas". Where has this specific model of facility been operated by Synagro in the U.S.?
- Odors: In addition to the already listed odor issues, the odorous compounds such as hydrogen sulfide, ammonia, odor from the belt dryer system, fans and other sources should be predicted based on an air dispersion model that considers wind direction, weather, and other site specific features such as structures. Will PADEP require this analysis? Why is hydrogen sulfide only being removed up to 1.5 ppm and ammonia only up to 2 ppm? Why aren't emissions from these chemicals being prevented? What will be the cumulative or mixing effect of existing odors from the landfill, combined with new odor sources at this facility? Will PADEP require such an analysis?

- Noise: It's stated that the enclosed operations will keep noise below 85 dBA and the exhaust fans operate at 80 dBA but will be enclosed but that there is no noise measurement for this exact facility. How can this information be relied upon? It's stated that truck backup alerts operate at 97-112 dBA at the source but will be reduced to 68.5 dBA at 150', less than the 70 dBA limit for the landfill. A noise model and noise testing run simultaneously with current noise from the landfill should be conducted to measure the cumulative noise impacts to the surrounding community. Will PADEP require this?
- Dust: It's stated that dust will be caught by the odor control system in the building and that outside dust will not be a problem as the trucks will be traveling on pavement and gravel and water will be applied to the ground when needed. Dust from sludge drying facilities can carry dangerous pollutants and the unloading and truck operations outside the facility can contribute to leaks, spills, and splashes that accumulate in dust on the site. An air dispersion model should be done to measure the likelihood of dust movement, as discussed under odors. Will the collected dust be sampled from the building and where will this dust be stored and disposed? How much dust is expected to be captured daily/monthly? Regarding the water to be applied at the site for dust suppression, where will this water come from since there is no discussion of water use at the site and if the water is trucked in, what will be its source, will it be tested for contaminants and how much is projected to be used monthly/annually? Will this water be captured as "contaminated" stormwater if it runs off the traffic area or will runoff as "uncontaminated" stormwater? It is stated that only "uncontaminated stormwater" will be routed to the stormwater basin and/or to surface water. Will the runoff from the traffic areas where dust suppression occurs be considered uncontaminated or contaminated and will runoff be sampled to determine its constituents and properties?
- Bog Turtle: Potential bog turtle habitat has been identified at the site and a survey must be performed. The bog turtle is listed as Endangered by Pennsylvania and is federally listed as Threatened under the U.S. Endangered Species Act. In Pennsylvania, as well as other states, they are threatened by habitat degradation and fragmentation which makes these vulnerable animals sensitive to land use change such as planned at this site. Will PADEP survey this site themselves or will they rely on the applicant?
- Grand Central Sanitary Landfill (GCSL) Modification to Sediment Basin #2: This is only an application that is open for comment, no draft permit has been issued for comment. It is unknown if there will be a draft permit available for public review and comment prior to it being issued. PADEP states that the permit modification 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" (NPDES Permit Fact Sheet Individual Industrial Waste (IW) and IW Stormwater, p. 1). Plainfield Township filed an appeal in September 2018 with PADEP contesting that sediment basin #2 is a properly permitted, engineered stormwater basin and is an abandoned quarry pit that discharge of stormwater to the basin causes pollution or contamination based on 17 objections. The

Township states that a permit must be required by PADEP for the basin. The proposed filling, relocation, and any other modification of the quarry pond cannot occur until this issue is resolved. This waste permit should not be issued until this legal matter is resolved. Read the Township appeal here: <https://bit.ly/2BXuYU8>. How can PADEP consider this waste permit modification when the use of the quarry pond as a sediment basin is under appeal? Will PADEP withdraw this permit until this matter is resolved?

- Grand Central Sanitary Landfill (GCSL) Modification to Sediment Basin #2: PADEP states that the permit modification will also cover “other earthwork within the GCSL permit area relating to the SBHRC [*sludge plant*] 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 directly to the Little Bushkill Creek and Waltz Creek, both classified by Pennsylvania as High Quality streams. Earth disturbance and construction of the proposed project in the watersheds of these streams can degrade their quality both during construction and post-construction during facility activities and operation. Considering the damage that could be done to these important natural resources, will PADEP hold up all earthwork until the stormwater management system, including the sediment basin, is resolved?
- Grand Central Sanitary Landfill (GCSL) Modification to Sediment Basin #2: PADEP states that the permit modification will also 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 truck traffic enters and leaves the Grand Central Sanitary Landfill through the State Rt. 512 entrance every day during operating hours (6:00 am to 6:00 pm). Sewage sludge and garbage is currently trucked into the landfill for disposal on the same road through this entrance. 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. Runoff drains and/or flows to Waltz Creek or Little Bushkill Creek, both High Quality, Cold Water streams protected from degradation by state regulation. Some road drains connect directly, without any stormwater system, to the Creeks. How much additional runoff from this new truck traffic will flow to the creeks and how will this be monitored? Road runoff typically carries salts from winter and dust control road treatments; sediment, hydrocarbons, Benzene, Toluene, Ethylene, and Xylene (BTEX), from the day-to-day emissions from the diesel powered trucks; and other pollutants that could be released from the sewage sludge, garbage and other landfill waste being transported in the trucks. The application and no proposed management practices to prevent polluted runoff to these waterways and their watersheds from the cumulative day-to-day truck traffic on this roadway and entrance area, despite the dangerous and, in some cases, hazardous materials being hauled through these locations. How will PADEP protect these streams from degradation from the proposed additional truck traffic?
- Groundwater Impacts from the Grand Central Sanitary Landfill (GCSL) Modification to Sediment Basin #2: In the application for the permit modification covering the co-located industrial activities, which includes the runoff to the creeks and to the sediment basin #2

from both the facility and the roads and scales, runoff drains and/or flows to the quarry pond (sediment basin #2). At least one road drain connects directly, without any stormwater system, to the quarry pond. Considered a water body protected by the rules, statutes and regulations of the Waters of the Commonwealth, the groundwater to which the pond is hydrologically 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 groundwater will be protected. How will PADEP provide the required protections to the groundwater 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?

- Additional Creek and Quarry Pond impacts: In the Grand Central Sanitary Landfill (GCSL) Modification to Sediment Basin #2, the application 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. The quarry pond is vulnerable to degradation from the input of polluted stormwater through the proposed new inlet. The proposed filling of the pond that will reduce the volume of the pond jeopardizes the quality of the quarry pond and its hydrologically connected groundwater. The Little Bushkill and Waltz Creeks are vulnerable to stormwater being conveyed by channel or spillway. The use of the quarry pond as a sediment basin is being contested by Plainfield Township. Will PADEP put this application on hold until the Township's appeal is resolved?