



Some Talking Points and Questions

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

<https://bit.ly/2O5uuBJ>

- 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?