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August 17, 2020

Via Email

Mr. Sachin Shankar, P. E.
Assistant Regional Director
Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Re: Withdrawal of Elcon applications

Dear Mr. Shankar:

As you requested, and consistent with the notice that was provided to the Department on July 23, 2020 (see attached), I have been authorized by our client, Elcon Recycling Services LLC, to provide this letter to the Department formally withdrawing the following applications for the Elcon project in Falls Township now pending before Department:

- Phase II RCRA Part B application
- Air Plan Approval Application
- NPDES Stormwater Construction Permit application
- NPDES stormwater GP application
- Application for planning modules

If there are any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Joel Bolstein'.

M. Joel Bolstein
Counsel for Elcon Recycling Services, LLC

cc: Dr. Zvi Elgat

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota Nevada
New Jersey New York North Carolina Pennsylvania South Carolina Texas Virginia Washington



Industrial Liquid and Solid Wastes Treatment Center

To: Joel Bolstein Esq. – Fox Rothschild LLP

From: Dr. Zvi Elgat CEO – Elcon Recycling Services LLC

Date: July 23, 2020

RE: Elcon's withdrawal of the permit applications

Elcon Recycling Services is announcing that it has decided not to proceed with its proposed project in Falls Township, Pennsylvania. The current business climate, including the impacts of COVID-19, has forced Elcon to re-evaluate its plans for expanding its hazardous waste treatment business into the United States. Elcon feels confident that it could obtain the approvals necessary to operate the proposed facility, and that the proposed facility would have provided an environmentally sustainable solution for treating liquid hazardous waste. Elcon very much appreciates the professionalism of everyone it has worked with at PADEP. The permitting process, however, is being terminated and Elcon will be notifying PADEP that it will be withdrawing the applications that are pending. It will also notify the Bucks County Court of Common Pleas that it is withdrawing its land use appeal. It is entirely possible that Elcon will seek to expand its treatment business into the U.S at some point in the future, especially if the U.S increases pharmaceutical manufacturing in response to COVID-19, with the corresponding need to increase the capacity for treating the liquid hazardous waste that is generated.

Dr. Zvi Elgat

CEO

A handwritten signature in black ink, appearing to be 'Zvi Elgat', written over the printed name and title.