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July 25, 2019

EXPRESS MAIL

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Mr. Thomas Magge
Water Management, Program Manager
Pennsylvania Department of Environmental Protection
Southeastern Regional Office
2 East Main Street
Norristown, PA 19401

Subject: NPDES Stormwater General Permit Application
Amended Application
PAG-03 Coverage
Elcon Recycling Services, LLC
Falls Township, Pennsylvania
IES Project No. EV191065.01

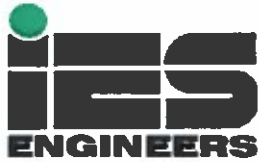
Dear Mr. Magge:

On behalf of Elcon Recycling Services, LLC (Elcon), IES Engineers (IES) is pleased to submit the enclosed original and two copies of the amended portions of the application for the National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit for Elcon's proposed facility located at 100 Dean Sievers Place, Falls Township, Pennsylvania.

Elcon recently responded to the Department's Waste Management Program staff to address comments outlined in its review letter dated May 15, 2019. Some of the comments were addressed by revising the site layout. These changes will affect the Industrial Stormwater Management application with respect to the quantity and distribution of impervious coverage. The site still intends to manage stormwater in a similar way as described in the March 1, 2019, application amendment. The purpose of this application is to provide the affected portions of the amended NPDES permit application submitted to the Department March 1, 2019, to align the NPDES permit application with the site features provided in response to the Department's recent comments.

As in our previous submission, we are enclosing only the pages that have changed as a result of revisions to the Part B application. The changes include:

1. Site layout
2. Impervious surface coverage
3. Change in stormwater management basin layout and location



Mr. Thomas Magge
July 25, 2019
Page 2

Elcon requests the Department to incorporate these new amended elements into the application package that was originally submitted on October 16, 2018, and amended on March 1, 2019.

We look forward to receipt of the NPDES Stormwater General Permit. If you have any questions or require additional information during the review and approval of this application, please do not hesitate to contact me or Dr. Rengarajan Ramesh of Elcon at (267) 243-3144.

Sincerely,

A handwritten signature in blue ink that reads "Marjorie J. Fitzpatrick".

Marjorie J. Fitzpatrick, QEP
Principal Project Manager

cc: P. Patel, PADEP
S. Shankar, PADEP (w/o attachment)
Z. Elgat, Elcon
R. Ramesh, Elcon
M. Tucci, IES
A. Soni, IES



1720 Walton Road, Blue Bell, PA 19422 610-828-3078 Fax 610-828-7842

AMENDED PORTIONS

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL
PERMIT (PAG-03) APPLICATION**

**ELCON RECYCLING SERVICES, LLC
FALLS TOWNSHIP, PENNSYLVANIA**

SUBMITTED TO:

**PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE
2 EAST MAIN STREET
NORRISTOWN, PA 19401**

SUBMITTED BY:

**IES ENGINEERS
BLUE BELL, PENNSYLVANIA**

IES PROJECT NO. EV191065.01

**ORIGINAL SUBMISSION OCTOBER 2018
AMENDED MARCH 2019
AMENDED JULY 2019**

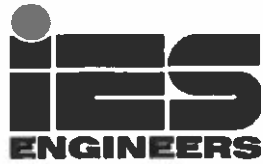


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Revision Narrative

Notice of Intent (NOI) Form - Revised July 24, 2019

Attachment C — Figures – Revised Site Plan



REVISION NARRATIVE

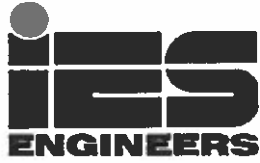
Elcon Recycling Services, LLC (Elcon) is proposing to construct a commercial facility for treatment of hazardous and residual liquid waste streams to be located at 100 Dean Sievers Place within the Keystone Industrial Port Complex (KIPC) in Falls Township, Bucks County, Pennsylvania.

Elcon recently responded to the Department's Waste Management Program staff to address comments outlined in its review letter dated May 15, 2019. Some of the comments were addressed by revising the site layout. These changes will affect the Industrial Stormwater Management application with respect to the quantity and distribution of impervious coverage. The site still intends to manage stormwater in a similar way as described in the March 1, 2019, application amendment. The purpose of this application is to provide the affected portions of the amended NPDES permit application submitted to the Department March 1, 2019, to align the NPDES permit application with the site features provided in response to the Department's recent comments.

As discussed previously with Department staff, the only pages enclosed are the ones that have changed as a result of revisions to the Part B application. The changes include:

1. Site layout
2. Impervious surface coverage
3. Change in stormwater management basin layout and location

Elcon requests the Department to incorporate these new amended elements into the application package that was originally submitted on October 16, 2018, and amended on March 1, 2019.



NOTICE OF INTENT (NOI) FORM
REVISED JULY 15, 2019 – PAGES 2 AND 4

County Name	Municipality Name	City	Boro	Twp	State
Bucks County	Falls Township	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
County Name	Municipality Name	City	Boro	Twp	State
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Site Location Address Line 1		Site Location Address Line 2			
100 Dean Sievers Place					
Site Location City	State	ZIP+4			
Morrisville	PA	19067			
Detailed Written Directions to Site					
Rt. 1 to S. PA Ave. to River Road to S. PA Ave to Old Bordentown Rd, to S. Port Rd to Dean Sievers Pl.					
Site Contact Last Name	First Name	MI	Suffix		
Ramesh	Rengarajan				
Site Contact Title		Site Contact Firm			
U.S. Representative					
Mailing Address Line 1		Mailing Address Line 2			
11 LeParc Drive					
Address Last Line – City		State	ZIP+4		
Princeton		NJ	08550		
Phone	Ext	FAX	Email Address		
(267) 243-3144			Ramesh.rengarajan@gmail.com		
Site-to-Client Relationship					
OWNOP					
Attach a site plan and topographic map with facilities and discharge locations identified (see instructions). See Attachment C for site plan and topographic map.					

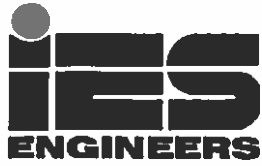
FACILITY AND DISCHARGE INFORMATION

1. Total area of site (sf):	1,406,866	% Pervious:	72.44	% Impervious:	27.56
2. Report the latitude and longitude of the facility below (see instructions).					
Latitude			Longitude		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
40	10	6.6	-74	45	38.9
Horizontal Reference Datum: <input type="checkbox"/> NAD of 1927 <input checked="" type="checkbox"/> NAD of 1983 <input type="checkbox"/> WGS of 1984 <input type="checkbox"/> Unknown					
3. Attach a Preparedness, Prevention and Contingency (PPC) Plan to the NOI.					
<input checked="" type="checkbox"/> PPC Plan Attached Date of Latest Update: New Plan					
Note for existing facilities: if there have been leaks or spills on-site within the past five years, report in the PPC Plan the cause of leaks or spills, the substance(s) released, measures taken to remediate the incident(s) and preventative measure(s) taken to reduce the possibility of future incidents.					
4. Identify and describe all non-stormwater discharges that are expected to occur during the 5 years following permit coverage or No Exposure Certification approval. Describe the frequency and volume of all such anticipated discharges.					
Elcon's treatment process results in zero industrial wastewater discharge; therefore, the only anticipated discharges from the facility are stormwater discharges.					
<input checked="" type="checkbox"/> No non-stormwater discharges are anticipated during the 5 years following coverage or approval					
5. Describe how often stormwater outfalls are inspected and routine maintenance performed.					
The stormwater management basin and outfall will be inspected at least twice per year. See the site PPC Plan in Attachment D for further preventative maintenance details.					

7. List all stormwater outfalls in the same order as #6, above, and provide the information requested below (see instructions). Use additional pages as necessary.

Outfall No.	No Exp.?	Non-SW?	Sampling?	Rep. Outfall	DA (sf)	% Imp.	Description of Materials/Activities in Drainage Area Exposed to Precipitation	Description of BMPs in Drainage Area to Control Pollutants in Stormwater
001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		530,125	73.13*	Facility roofs, parking lots, asphalt pavement, or grass areas. See Attachment A for further details.	See Attachment D, PPC Plan, for detailed BMPs. BMPs prescribed by the PAG-03 General Permit will be implemented.
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					

8. Do any of the outfalls identified above discharge to a storm sewer system? Yes No Is the storm sewer an MS4? Yes No
 Name of storm sewer owner/operator: _____ Outfalls discharging to storm sewer: _____



ATTACHMENT C
FIGURES
REVISED SITE PLAN