



December 18, 2019

Dr. Rengarajan Ramesh  
Elcon Recycling Services, LLC  
11 LeParc Drive  
Princeton, NJ 08550

Re: Clarification Request for Elcon's Response to Notice of Intent to Deny  
Phase II RCRA Part B Application  
Elcon Recycling Services, LLC  
ID No. PAR 000 544 486  
APS No. 872052, AUTH No. 1075413  
Falls Township  
Bucks County

Dear Dr. Ramesh:

The Pennsylvania Department of Environmental Protection ("DEP") is in the process of reviewing Elcon Recycling Services, LLC's ("Elcon") Response (the "Response") to DEP's May 15, 2019, Notice of Intent to Deny the above referenced Phase II RCRA Part B permit application for Elcon's proposed commercial hazardous waste storage and treatment facility to be located at 100 Dean Sievers Place within the Keystone Industrial Port Complex (former United States Steel Fairless Works site) in Falls Township, Bucks County. The Response was received on July 15, 2019. DEP is seeking clarification on the following items listed in the Statement of Basis in DEP's Notice of Intent to Deny:

#### **Requested Clarifications**

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1. Please clarify the following items concerning the groundwater monitoring program as detailed in the July 15, 2019, response and attachments:
  - a. Please update Figure 2 to label the wells, MW-1 to MW-5, as indicated in DEP's 5/15/19 comment letter.
  - b. In Elcon's closure plan, please clarify Elcon's required groundwater monitoring activities during the facility's closure period and how the groundwater monitoring program will be evaluated to ensure final closure of the site.
  - c. Please modify and/or clarify the groundwater monitoring cost estimates during closure.

2. Please provide the distance between the radiation monitor sensors that Elcon is proposing to install at the entrance of the facility.
3. Please clarify how Elcon calculated the \$4.44/gal weighted average costs contained in the Response. Please provide all documentation that Elcon relied on to calculate the \$4.44/gal weighted average cost.
4. Please provide additional information confirming that the facilities Elcon identified may accept Elcon's waste (anticipated characterization and facilities acceptance criteria) at closure. Please clarify whether the transportation costs to these facilities were included in the \$4.44/gal weighted average costs.

Please submit responses to the above clarification requests in full within 30 calendar days from the date of this letter or DEP may proceed to deny the application as indicated previously.

Should you have any questions regarding the identified clarification request, please contact this office at the telephone number referenced in the footer of the first page, and refer to Application No. 872052, Authorization No. 1075413, to schedule a meeting.

Sincerely,



Patrick L. Patterson  
Regional Director  
Southeast Regional Office

cc: Mr. Gray, Falls Township  
Ms. Kostick, Bucks County Health Department  
Ms. Lemoine, U.S.E.P.A., Region 3  
Ms. Fitzpatrick, IES Engineers