



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

November 27, 2017

CERTIFIED MAIL NO. 7016 0600 0000 7331 2257

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

Re: Assertion of Confidential Business Information
Elcon Recycling Services, LLC
Phase II RCRA Part B Application
Falls Township, Bucks County
ID No. PAR 000 544 486
APS No. 872052, AUTH No. 1075413

Dear Dr. Ramesh:

On October 13, 2017, the Department of Environmental Protection (DEP) received the assertion of Confidential Business Information ("CBI") relating to the entire original Real Estate Sales Agreement, and the eighth amendment of same, between Elcon Recycling Services, LLC ("Elcon") and United States Steel Corporation ("USS"). Elcon is asserting a claim of CBI for information submitted as part of its application for a proposed commercial hazardous waste storage and treatment facility to be located at 100 Dean Sievers Place in Falls Township, Bucks County. That application is currently undergoing administrative review, the results of which will be relayed to Elcon at a later date, in accordance with Section 309(d) of the Hazardous Sites Cleanup Act, 35 P.S. § 6020.309(d).

Elcon claims that the referenced Real Estate Sales Agreement and the eighth amendment of same, in their entirety, constitute confidential business information under Section 270a.12 of the Department's Hazardous Waste Regulations, 25 Pa. Code § 270a.12. In order for DEP to evaluate Elcon's claim for confidentiality, please identify the specific information contained within each section of the agreement and amendment for which Elcon is claiming as CBI and substantiate each claim by more fully describing the nature of the substantial harm to Elcon's competitive position by disclosure of the information, the reasons it should be viewed as substantial, and the relationship between the disclosure and the harm, in accordance with the requirements of 25 Pa. Code § 270a.12(2)(vi).

Dr. Rengarajan Ramesh

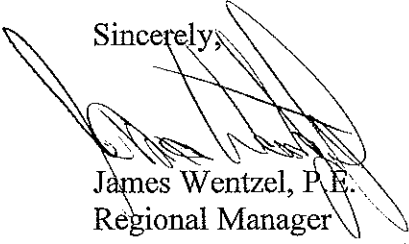
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Please provide this information within **two weeks** of receipt of this letter so that DEP may complete its evaluation of Elcon's claim for CBI. During the interim, DEP will maintain the subject information as if it were confidential until a final determination on confidentiality is made.

We await your response.

Sincerely,



James Wentzel, P.E.
Regional Manager
Waste Management

cc: Ms. Kinslow, USEPA Region 3
Re 30 (rc17wm) 325.1
