



July 26, 2018

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

Re: Administrative Completeness Review
Phase II RCRA Part B Application
Elcon Recycling Services, LLC
Falls Township, Bucks County
ID No.: PAR 000 544 486
APS No.: 872052, AUTH No.: 1075413

Dear Dr. Ramesh:

On March 1, 2017, the Pennsylvania Department of Environmental Protection (“DEP”) received the above-referenced Phase II RCRA Part B permit application (“the Application”), submitted by IES Engineers on behalf of Elcon Recycling Services, LLC (“Elcon”), for a 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.

DEP conducted a series of administrative completeness reviews on the Application, resulting in two DEP administrative deficiency letters dated May 30, 2017, and January 9, 2018. In response to those review letters, Elcon supplemented the Application by responses received by DEP on October 13, 2017, and May 9, 2018 (“the Responses”). The Responses were intended to address the comments noted in DEP’s two administrative deficiency letters and supplemented the Application by providing additional information and/or revisions to pages, forms, reports or drawings submitted in the Application.

DEP has reviewed the above-referenced application for administrative completeness and has determined that the Application, as supplemented by the Responses (collectively “the Phase II Application”), contains sufficient detail to conduct a technical review and is now administratively complete. A notice to this effect will be placed in the *Pennsylvania Bulletin*. Note that this is not a final action by DEP on this application. The administrative completeness review is the first in a series of reviews conducted by DEP.

In accordance with Section 309(e) of the Hazardous Sites Cleanup Act, 35 P.S. § 6020.309(e), DEP will now conduct a ten (10) month technical review of the Application.

As part of technical review, Elcon may be advised if additional information is required to further clarify, modify or supplement previously submitted application material. Any such requests for additional information as part of technical review do not render an application administratively incomplete. However, failure to correct deficiencies in the application may result in denial of the application in accordance with applicable statutory provisions.

Elcon is reminded that it should submit all other DEP permit applications as soon as possible so that reviews can be coordinated. Please refer to DEP's March 24, 2017, letter regarding permit coordination.

Sincerely,



Patrick L. Patterson
Regional Director
Southeast Regional Office

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