

July 31, 2019

Mr. Erik Garton, PE
Gilmore & Associates, Inc.
65 East Butler Avenue, Suite 100
New Britain, PA 18901

Re: Application for Planning Modules
Elcon Recycling Services, LLC
DEP CODE NO. 1-09002-245-3
Falls Township
Bucks County

Dear Mr. Garton:

This letter is in reference to your July 23, 2019 request for reconsideration for the application for Sewage Facilities Planning Modules for the Elcon Recycling development. This project proposes the construction of industrial wastewater recycling facility on 32.3 acres. The project will be served by public sewers. The project is located at 100 Dean Sievers Place within the Keystone Industrial Port Complex, in Falls Township (Township), Bucks County on Tax Map Parcel 13-51-1-5.

Your letter provided a new mailer and PNDI documentation along with estimated sewage flow calculations provided by IES Engineers. Your letter stated your belief that the project is exempt from Act 537 Planning since it will utilize a private treatment facility.

Sewage facilities planning is still required for this project, as stated in the Department of Environmental Protection's (DEP) letter of March 2, 2016 (see attached). Sewage facilities planning is required whenever a subdivision occurs. Projects that propose flows greater than 800 gpd are deemed to have been subdivided per DEP's Chapter 71 regulations. A deemed subdivision also occurs when projects propose 400 gpd or more of additional sewage flows at a property already produces at least 400 gpd of sewage. Since your project proposes additional flows greater than 400 gpd and total flows greater than 800 gpd, it is deemed to have been subdivided and planning is required.

If you have any questions concerning the information required, please contact me at 484.250.5184.

Sincerely,



Kelly Boettlin
Sewage Planning Specialist 2
Clean Water

Enclosure: DEP's March 2, 2016 checklist letter

cc: Falls Township
USS Real Estate
Elcon Recycling Services, LLC
Planning Section
Re