

April 15, 2025

Ms. Michaele Gobel, Principal/CFO Liberty Soils, LLC 411 NW Park Avenue, Suite 401 Portland, OR 97209

via email: Gobel@eq-cap.com

Re: Local Municipality Involvement Process (LMIP) Meeting

Municipal Waste Major Permit Modification Application

Liberty Soils Biosolids Management Facility

Application# 603455-A251

APS No. 1129302 Auth No. 1513091 Reilly Township, Schuylkill County

Dear Ms. Gobel and Local Government Officials:

Thank you for attending the March 27, 2025 LMIP meeting regarding Liberty Soils' application for a major permit modification for an increase in the facility's daily maximum tonnage at its biosolids management facility located at 500 Blackwood Road in Reilly Township, Schuylkill County.

We hope that you found the meeting helpful regarding the proposed modification and the DEP permitting process and that topics regarding truck traffic and storage capacities were adequately explained. Only municipalities and local government officials that attended the meeting are cc'd on this letter.

Attached is a Liberty Soils fact sheet about the application.

If you have any questions, please contact Dave Matcho dmatcho@pa.gov or at 570-830-3111.

Sincerely,

Roger Bellas

Roger Bellas

Environmental Program Manager

Waste Management Program

Enclosures: Liberty Soils Fact Sheet

cc: Sarah Hrywnak, Third Oak, Inc. (via email: shrywnak@third-oak.com)

Reilly Township w/ enclosures (via email: reillytownship@yahoo.com)

Washington Township w/ enclosures (via email: office@washingtontownship.info)

Branch Township w/ enclosures (via email: branchtownship@comcast.net)

Schuylkill County w/ enclosures (via email: bhetherington@co.schuylkill.pa.us)

# Liberty Soils, LLC // Overview of the Permit Modification Application SW 603455 Submitted to PA DEP Jan. 2025

## **Excerpt from Permit Application Docs:**

The applicant, Liberty Soils, LLC, proposes the following modifications:

- 1. Accept a monthly average of 300 wet tons of biosolids per receiving day, with a daily maximum of 500 wet tons of biosolids. The current permit allows the facility to accept a daily maximum of 300 wet tons of biosolids. The requested modification allows a daily surge of up to 500 wet tons of biosolids and keeps the monthly average to 300 wet tons of biosolids per receiving day (Monday Saturday). There will not be an increase in the total annual wet tons of biosolids received.
- 2. Rename the "curing building" and "covered product storage area" to "Storage Buildings" and redefine the function of the Storage Buildings for product curing and storage.

### What does this mean?

#### Item #1 Explained:

- Liberty is currently permitted to receive a <u>maximum</u> of 300 wet tons of biosolids per day.
- Liberty is requesting a modification to the <u>method</u> for measuring the 300-ton daily maximum.
  Liberty is asking that the measurement be 300 wet tons per day, <u>averaged</u> over a month, but no more than <u>500</u> tons per day.
- The current permit's language limits Liberty's abilities to operate as intended, at 300 tons per day.
- Due to the nature of Liberty's business and the current language of the permits, Liberty averages approximately 260-280 tons per day, 20-40 tons less than intended.
- With the requested permit modification, Liberty will be better equipped to handle the nature of a logistics business and reach its current 300 wet tons per day permitted capacity.
- The change will allow Liberty to absorb the ebbs and flows of the business that are outside of Liberty's control (i.e., truck breakdowns, road closures, unsafe travel conditions). If a scheduled load is missed, it can be made up for the following day.
- The receiving days will remain the same (Monday Saturday)
- The volume of finished product produced annually will remain the same.

# Item #2 Explained:

- Liberty is changing the names on the site plan of two buildings to reflect their actual names.
- This is an administrative change. The permit change will not change the daily process. This is simply updating the permit documents to reflect current operations.