



June 11, 2020

Dr. Zvi Elgat, CEO
c/o Dr. Rengarajan Ramesh
USA Representative
Elcon Recycling Services, LLC
11 LeParc Drive
Princeton, NJ 08550

Re: Wastewater Treatment & Storage Facility
Application No. 09-0228A
APS ID No. 980277, AUTH ID No. 1250768
Falls Township
Bucks County

Dear Dr., Elgat:

After continuing to review the initial submission of Plan Approval application 09-0228A as well as the supplemental information submitted on 2/6/20, the Department of Environmental Protection's (DEP) New Source Review Section has identified some additional questions. In order to complete our evaluation please review the statements and questions below and forward a response to the DEP.

1. Submit a detailed startup plan that at a minimum includes inspecting, adjusting and testing of main mechanical components, dry testing of all electrical equipment including instrumentation and process control devices and the primary ranges set on instrumentation. Include a phased startup plan with a gradual increase in treatment of wastewater until it can be determined the plant can be operated safely and within the DEP's regulations.
2. Plan Approval application, Section C, page 39: the maximum capacity for each thermal oxidizer burner is listed as 70 MMBtu/hr, however Table 3-9 in Attachment 3 of the Plan Approval application lists the size of each thermal oxidizer burner as 90 MMBtu/hr. Specify what the size of the thermal oxidizer burners will be.
3. Attachment 3, Table 3-2 of the Plan Approval application: The NO_x controlled annual emission rate is listed as 21.00 tons per year. Forward the calculations to demonstrate how this number was calculated. Also, does the 21.00 tons per year include combustion emissions from the rotary dryer burner and both of the thermal oxidizer burners?

4. Attachment 3, Page 3-6, of the Plan Approval application: Emission estimates and supporting calculations states that the peak loading to the oxidizer is calculated to be 4,400 lbs/hr of VOC. Provide the calculations to demonstrate how this emission rate was arrived at. Also, include how the breakdown for fraction of maximum hourly emissions was calculated.
5. Provide the calculations for the VOC emissions for Sources 102, 103, 105 and 107.
6. Attachment 3, Table 3-2 of the Plan Approval application: The organic HAPs are included with the VOC emissions and the inorganic HAPs are included with the PM emissions. Forward a separate listing for the organic and inorganic HAPs to include a list of the HAPs that were calculated and HAP emissions from each source.
7. Attachment 3, Page 3-8 of the Plan Approval application: The emissions for the drying ovens and the reactor vents are listed. The VOC emissions from both sources are exactly the same, the Department wants to confirm that these emission calculations are correct.
8. Attachment 3, Page 3-17 of the Plan Approval application: Elcon is proposing an average SO_x emission of 5.70 lb/hr. Please forward the calculation on how this number was arrived at.
9. Is the crystallizer reboiler heated by the waste heat boilers?
10. How will the treatment units that are powered by steam from the waste heat boilers operate prior to the waste heat boilers reaching their operating temperature and providing the required steam output?
11. How is the brine dryer powered?
12. On page 7 of the technical data provided by Durr for the thermal oxidizers it states the waste stream has an Ammonia content of 0%, where as in Attachment 3 page 3-18 of the Plan Approval application it states that, "ammonia emissions can be formed during the treatment process due to ammonia-containing liquid waste."
13. Attachment 6, Page 6-1, of the Plan Approval application: The application states "An interlock system and alarm system will be in place to stop the process feed to the operations if one of the thermal oxidizer combustion chamber temperatures falls below the temperature established during the most recent compliance test." Please indicate where in the treatment process the process feed will be halted.
14. Please provide a combustion chamber temperature for the thermal oxidizers that will be used as the set point in the plan approval until it can be determined what the most efficient operating range will be through monitoring and recordkeeping.

15. Provide more detail on the carbon adsorption system, specifically, how VOC emissions will be monitored, and breakthrough detected.
16. Provide information of all violations that occurred at Elcon's facility in Israel. This information should include the violation, date and how Elcon resolved the violation.

The above is requested in accordance with 25 Pa. Code Section 127.12(a)(2) and (10), and produced under the responsible charge of Mr. James Beach, P.E. You must submit a response for each of the above deficiencies within 30 calendar days. Should you have any questions regarding the identified deficiencies, please contact DEP to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 10-day period allotted for your reply, unless otherwise extended by DEP. You will have a final opportunity to correct any deficiencies, which will be summarized in a pre-denial letter, before DEP makes a final determination on your application.

If you have any questions concerning this matter, please contact me at 484.250.5071, and refer to **APS ID No. 980277, AUTH ID No. 1250768.**

Sincerely,



Stephen J. Steirer
Engineering Specialist
Air Quality

cc: Mr. Ramamurthy, Director of Air Quality, RCSOB
Mr. Trivedi, RCSOB
Mr. Evans, RCSOB
Mr. Fleck, RCSOB
Division of Permits
Mr. Beach
Mr. Mountain
Mr. Rebarchak
Mr. White
Ms. Hunt
Ms. Cain
Mr. Fogel
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