

To : Hazardous Waste Facility Siting Team Leader, PaDEP

Via Email: RA-HazWaste@pa.gov

From : Catherine A. Ross. 407 Centennial Drive, Morrisville (FALLS TWP) PA 19067

Re : ELCON Public Hearing

Date : October 13, 2015

To whom it may concern,

I write to state my opposition to the proposed ELCON facility and the Phase I Siting Criteria Permit for the plant proposed to be constructed in Keystone Industrial Port Complex (KIPC), Falls Township, Bucks County PA.

I have lived and voted in Falls Township for more than 35 years. My home is located about 3.5 miles from the proposed Elcon facility. As a community we already bear the environmental impact on our air and water quality resulting from faulty landfill operations in the nearby area that are unable to operate within prescribed limits.

There are no operating Elcon facilities anywhere in the world but Israel. Elcon's recent bid to expand operations to Castellanza, Italy, was denied, with officials citing numerous inconsistencies in the documents and too many important critical environmental issues to fully delineate the potential impact on the environment. ¹

The operating Elcon plant in the Haifa Bay area, is located in Dshanim Industry Park, Kiryat-Ata. The Israeli Ministry of Environmental Protection ordered the plant relocated out of Haifa Bay area by the end of 2015² for the health and safety of its own citizens to the designated hazardous waste disposal area in the Negev desert of south central Israel. This is the same region where Elcon has transported its hazardous salts³ and sludge output from the Haifa area plant.⁴ The Ramat Hovav⁵ area is reknown for its pollution and the national dumping site for the

¹ <https://translate.google.com/translate?hl=en&sl=it&u=http://www.varesenews.it/2013/09/e-arrivato-il-no-definitivo-la-elcon-non-si-fara/51555/&prev=search>

² See section entitled "Remove Hazardous Material Facilities" in the 2015 Action Plan to Reduce Pollution and Environmental Risks in Haifa Bay 2015-2020" of the Israeli Ministry of Environmental Protection.

http://www.sviva.gov.il/English/env_topics/IndustryAndBusinessLicensing/Haifa-Bay-Industrial-Zone/Pages/Plan-to-Reduce-Air-Pollution-and-Environmental-Risks-in-Haifa-Bay-2015-2020.aspx

³ <http://www.haaretz.com/hasen/spages/880535.html>

"The company developed technology to treat high concentrations of organic matter in effluents produced in pharmaceutical plants. They have decided to transform hypersaline effluents into solid salt rather than dispose of them in pools. The resulting salt is, of course, transported to Ramat Hovav."

⁴ <http://www.haaretz.com/hasen/spages/880535.html>

nation's hazardous waste chemicals. The area was originally chosen for its isolated location, the direction of its winds, and scarce population.

The KIPC Falls Township location is not and should not become a designated hazardous waste disposal area for the eastern half of the United States as envisioned by Elcon⁶. Unlike Ramat Hovav, this area is not isolated nor in a desert area with safe wind direction. It is surrounded by dense population areas of Bucks County, Mercer County and Burlington County, New Jersey. The direction of the winds and the flow of the waterways impact millions of people.

According to Dr. Zvi Elgat, Elcon founder and CEO, the Haifa plant is "a carbon copy of the plant Elcon intends to build in Falls Township".⁷ He reported that the Israeli facility has been in operation for ten years "**without a glitch**". He also stated that "**If you don't operate it properly, anything could happen**" in response to questions about environmental risks of the facility.⁸

Elcon has a history of violations exceeding limits of hazardous pollutants in the end products of Elcon's treatment process⁹, brine, salts, sludge, air emitted from its processing plant and water that is processed and discharged and/or made available for other plants to re-use. Accordingly Israeli Ministry of Environmental Protection relocated the plant away from Haifa to a remote desert centralized hazardous waste region instead.

The Israeli Ministry concern for environmental risks in the event of an emergency incident in a factory, war or an earthquake, or during the transfer of hazardous materials is worthy of

"Sacks full of sludge, produced in a process in which effluents are dried, are placed in a long line in the Elcon back-lot every day, ready to be transported to Ramat Hovav."

⁵ https://en.wikipedia.org/wiki/Ramat_Hovav

⁶ "Operations will serve as a catalyst for industrial and pharmaceutical companies to expand or locate in the region as this type of facility is not located anywhere on the east coast." Pg 2 An Introduction to Elcon brochure.

⁷ Feb 18, 2014 presentation to Falls Twp Board of Supervisors.

⁸ Watch the video starting at 1:26 (8:24 pm on the meeting time clock within the video) at <https://www.youtube.com/watch?v=Asc0M7Qh33Q&feature=youtu.be>

See meeting minutes for 2/18/14 Falls Twp Board of Supervisors Meeting (Item #9, page 7) at <http://fallstwp.com/media/13177/02-18-2014-Minutes.pdf>

⁹ <http://www.haaretz.com/hasen/spages/880535.html>

Transport of Elcon treated polluted hazardous brine waste was halted by Israeli MoEP due to exceeded limits of pollutants. A complete record of the Ministry of Environmental Protection action as to Elcon is available upon freedom of information act request by any Israeli citizen. It is not presently available to Falls Twp residents to further document the violations and failures of Elcon to operate properly and safely.

consideration when making safe site location decisions for a plant such as Elcon. Unlike PaDEP, the Israeli Ministry has knowledge of Elcon operations since 2003 in Haifa.

To reduce risks from hazardous materials the Israeli Ministry has taken action for Elcon to be relocated considerably inland, away from any rivers, bodies of water, or population centers. If such an emergency were to occur, or the ongoing violations remain unresolved, the Israeli Ministry has mitigated in advance the damage that could be done to their waterways and their citizens.

THE PROPOSED KIPC LOCATION IS NOT ONE THAT CAN TOLERATE EMERGENCY EVENTS AT A HAZARDOUS LIQUID WASTE FACILITY.

Changing weather patterns suggest a greater potential for combined weather events than in the past. An abundance of caution should be applied in determining flood potential and damage to surrounding waterways and water supplies of millions of people who depend on drinking and domestic water from Delaware River sources.

“If you don’t operate it properly, anything could happen.”

Beyond flooding, the topography and proximity to surrounding open bodies of water and wetlands is such that any kind of hazardous spill will make its way into the ground water and migrate quickly to connecting neighboring larger bodies of water and the water supply. The Delaware River supports several endangered species and extensive recreational and economic activity. Immediately across the river from the proposed site is the Abbott Marshland, important in its function of recharging groundwater and removing pollutants from air and water in addition to providing habitat for wildlife and recreational opportunities.¹⁰

Unlike landfills, a liquid hazardous waste facility poses a serious risk due to domestic terrorism and the proximity to the Delaware River. There is no 500 year or 100 year map for terrorism. Convenient, quick access and the potential to cause contamination of the surrounding water systems and waterways would be simple to accomplish. The outcome would impact everything down stream in the Delaware River, numerous public water systems, numerous power generation facilities, numerous industrial facilities and the ports of Bucks County, Philadelphia, Camden, and Marcus Hook, that utilize water from the river. Immediately across the river is the Mercer generating station in Trenton, NJ. In and near the Keystone Industrial Port Center are the Fairless co-generation plant, the Fairless Energy Company, and Wheelabrator who all depend upon river water for operations. We recently saw the results of an accidental vinyl chloride spill in Paulsboro, NJ that resulted in children being locked down inside their schools for their protection. <https://www.rt.com/usa/train-vinyl-chloride-njersey-980>

There are over 10,000 students attending high schools and elementary schools in Morrisville, Fallsington, Fairless Hills, Levittown, Trenton and Bordentown all located within 4 miles of the proposed site. An accident or a planned act of terrorism utilizing liquid hazardous waste would be much more damaging than the Paulsboro spill with long lasting effects on our area.

¹⁰ <http://marsh-friends.org/>

Explosiveness of certain liquid hazardous waste processed by Elcon has resulted in the need for development by Elcon of patents seeking to reduce the explosiveness during the transport and processing of liquid hazardous material. See patents US8647582¹¹ and US8920738¹² (System for safely processing a fluid via monitoring & decreasing explosiveness). Site location concerns must include consideration as to the impact of explosion, and fire at the proposed site, their potential to result in a deadly hazardous fire unmanageable by emergency personnel, and further to create and deposit contaminated remains that find their way into the air, surrounding properties and water supply.

The protection of our health and safety requires full investigation into all ramifications of site location and a healthy skepticism when faced with assertions of perfect operation of a facility that handles hazardous materials. This is especially so when the facility being proposed is in the process of being redesigned according to its recent pending application upon denial of its first application for siting approval. It will be the first of its kind in the world in Elcon's efforts to avoid meeting regulatory requirements associated with discharge of its treated effluent. Instead, the facility will operate at a higher temperature with the goal of producing "clean" water for sale to other industrial users. **THIS IS A NEW AND UNPROVEN TECHNOLOGY.**

The plant and it's processes are being redesigned. This application should be updated to reflect that completed "re-design" before any approval is granted. The portions of this application that state information is unavailable due to the "re-design" should be completed before a decision is made. **This application is incomplete and refers to technology and processes that are not yet developed and in proven use.**

I urge you to deny this site application as failing to meet the requirements to protect the waterways, the water supply, the air quality, and as failing to protect against other potential harms to the population and environment that could result from natural and man made disasters, as well as errors of man and machine. My neighbors and I are among that population. The water we drink and the air we breathe come from this environment.

Thank you for the opportunity to submit comments.

Sincerely,

Catherine A. Ross

Catherine A. Ross

407 Centennial Drive
Morrisville, PA 19067
ross@ross-ross.com

¹¹ <http://www.google.com/patents/US8647582>

¹² <http://www.google.com.ar/patents/US8920738>