

Elcon Phase One Criteria Public Hearing - September 30, 2015

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"I do not want daily truck-loads (17-25) of hazardous waste coming into Bucks County to be baked and boiled by Elcon Recycling Services. Elcon claims there is no flare, but this facility is baking hazardous waste with toxic chemicals in a thermal oxidizer, discharging over 2 tons of hazardous sludge per day and 5,000 tons of hazardous salts per year. They have not disclosed where its waste will be disposed of.

This is an unproven technology. In April of 2013, the Elcon Recycling Facility in Haifa, Israel exceeded limits of various pollutant levels in its discharged water. The company released illegal levels of Total Organic Carbon, Chloride, Potassium, Sulfates, Copper and Nickel. Elcon also routinely exceeded levels of sulfide emissions and Halogenated Organic Compounds (like chloroform) and broke the Chromium limit in August of 2012. Heavy metals and organic carbon in water raises the cancer risk for those in surrounding areas.

Elcon claims they do not know what hazardous wastes will be processed at the facility and until this information is made public please go no further in the siting process. Elcon has applied to process 596 different kinds of hazardous waste that may contain up to 120 mg/l of Mercury, 900 mg/l of Lead and 300 mg/l of Cadmium.

In several inspections DEP noted that the ground was covered with slag and refractory materials and urged Elcon to do soil samples. I do not believe Elcon has not done such sampling.

Bucks was the only county in Pennsylvania to have more than one "Red" ozone day in 2013. In 2014, Bucks was second only to Pittsburgh and Philadelphia for "orange" ozone days. On red ozone days the air is unhealthy for all residents, not just children, the elderly and asthmatics. 25 tons per year of NOx pollution, proposed by Elcon, can only make the air in Morrisville unhealthier. In 1999, EPA named the Philadelphia-area as a severe non-attainment area for ozone pollution. In a severe non-attainment area, facilities emitting 25 tons of NOx per year are major sources. I believe that the lack of history on this facility or similar facilities requires DEP to treat it with caution and consider it a major source of pollution in a troubled area.

Morrisville's air quality is already poor and exposes low-income and minority populations to toxic air pollution. The Wheelabrator Falls waste incinerator (including trash and tires) is adjacent to the proposed site. Within three miles there are over 48,000 residents, half of which are minorities and 34% live under the poverty line. This qualifies Morrisville as an environmental justice community, deserving protection from additional pollution from hazardous facilities. The Wheelabrator Falls facility was found to have violated their DEP air permit in May for "Failure to meet the Department's continuous emission monitoring requirements." Please do not allow Elcon Recycling Services to bring hazardous waste to an already impoverished, polluted area where facilities burning waste are currently breaking air rules."

Thank you