



Some Talking Points
“Slate Belt Heat Recovery Center”
Plainfield Township and Pen Argyl, Northampton County, PA.
Draft Industrial Stormwater Permit
“NPDES” PA0276120, Storm Water, SIC Code 4953

Synagro’s proposed sludge drying plant is moving through the PA Dept. of Environmental Protection’s (PADEP) approval process. There are several permits needed, this is the first draft issued. PADEP states: “The application is for a new NPDES permit for a new discharge of treated Industrial stormwater. The receiving stream(s), Waltz Creek and UNT Little Bushkill Creek, are located in State Water Plan watershed 1-F and is classified for Cold Water Fishes, Migratory Fishes, High Quality—Cold Water, and Migratory Fish, aquatic life, water supply and recreation. The discharge is not expected to affect public water supplies.” PADEP provides a list of contaminants that may be included in the final permit and states that the design flow is 0 MGD. See the public notice and draft permit here: <https://bit.ly/2C0cySQ>

- It is stated in Synagro’s application for the industrial stormwater discharge permit that the project “meets the provisions of zoning ordinance” or that it has received zoning approval from the Township. (PADEP General Information Form, p. 3.) This is obviously false since Plainfield Township Planning Commission hearings are ongoing and there are contested zoning issues. **The draft permit should be withdrawn by PADEP on these grounds.**
- It is unclear precisely how PADEP will assure that the stormwater discharge doesn’t degrade Little Bushkill Creek and Waltz Creek. The limits for the parameters listed in the draft permit are unclear and do not include many of the pollutants that can be found in sludge and its process wastewater. Is this because the “design flow” is 0 MGD? See scientific reports and studies about sludge and “biosolids” here: <https://bit.ly/2xBcZif>
- In the application to PADEP for this permit, Synagro submitted only partial, unclear, or, in some cases, invalid information about the proposed facility:
 - Sediment basin #2 is described as an “existing, permitted, non-discharging, engineered stormwater control pond” and “does not connect with Little Bushkill Creek” (NPDES permit app., March 2018, Module 1, p. 3) However:
 - The draft permit is based on invalid information about sediment basin #2. Plainfield Township filed an appeal with PADEP on September 11 contesting the classification of the basin as described above based on 17 objections.

The draft permit should be withdrawn until this legal matter is resolved.

Read the Township appeal here: <https://bit.ly/2BXuYU8>

- The basin is a former quarry pond that discharges to groundwater and is hydrologically connected to the Little Bushkill Creek watershed. See an expert's letter on this issue here: <https://bit.ly/2IL0xSF>
 - The basin discharges to the Little Bushkill Creek's surface water through an outflow structure and spillway under certain conditions so it is not "non-discharging". The Plainfield Township SALDO (SW Management Chapter 22 – Part 10.7) requires an outflow control structure to prevent flooding and requires that all detention basins have an emergency spillway.
- The application materials claim that only "uncontaminated runoff" will be sent to the quarry pond/sediment basin #2 but this description does not consider all the contaminants that could be in the stormwater that may be carried there by all activities at the site. There is no explanation of how it was concluded that the stormwater from the site will not be contaminated except to state that areas where the sludge processing activities will take place will collect stormwater to be sent to the wastewater silo and then trucked offsite, not to the basin. The entire site and entrance area is an industrial site and should be controlled as such.
 - The application materials state that the drying units will use waste heat from the Green Knight landfill gas-powered turbines and go so far as to say "The proposed project location was chosen based on the waste heat source provided" by Green Knight. This is misleading at best because there is no analysis that shows how much landfill gas will be produced or for how long it will be used. Imported natural gas is identified as the alternative fuel to be used and there is already a gas pipeline in the vicinity and a new one is part of the project proposal. (NPDES permit application, March 2018, Introduction, p i.)
 - The application materials describe the vegetated swale that is proposed around a portion of the quarry pond/sediment basin #2 as a "best management practice". But it is not demonstrated that the swale will remove the contaminants in the stormwater that may be carried there; it is simply assumed. (NPDES permit application, March 2018, Introduction, p ii.)
- There are other issues and questions raised by the stormwater discharge permit due to lack of information or lack of sufficient detail:
 - The extent and frequency of monitoring at Outfall 001, where the swale will convey stormwater, is unclear. It is stated in the application materials that it will be sampled once at the startup of the operation and at least semi-annually after that, based on permit requirements that are not spelled out. The parameters to be tested for are listed in the application as "oil and grease, BOD5, COD, TSS, Total Nitrogen, Total Phosphorus, and pH", and as required in the NPDES permit. (MODULE 1 Supplemental Narrative - Anti-Degradation, Slate Belt Heat Recovery Center, p.1-2.)

Why won't the monitoring include more contaminants that are known to be contained in sludge and the process wastewater and why won't it be continuous, considering the irregular and changing make-up of the contaminated materials from a wide variety of sources that will be entering and leaving the facility? How will the routine spills and runoff that occur at an industrial operation of this intensity - at such a crowded location with a variety of dangerous pollutants - be discovered and prevented from entering the pond/basin and, in turn the groundwater and the Little Bushkill and Waltz Creeks, if there is no continuous monitoring system for a comprehensive list of contaminants to alert for pollution?

- An enormous amount of truck traffic enters and leaves the Grand Central Sanitary Landfill through the State Rt. 512 entrance every day during operating hours (6:00 am to 6:00 pm). Sewage sludge and garbage is currently trucked into the landfill for disposal on the same road through this entrance. Forty truck trips per day are planned to serve the proposed sludge drying plant and another ten truck trips per day to carry the "biosolid" pellets to market, adding to the already heavy truck traffic. Runoff drains and/or flows to Waltz Creek or Little Bushkill Creek, both High Quality, Cold Water streams protected from degradation by state regulation. There is no discussion about the potential impacts of polluted runoff from this additional truck traffic and no proposed management practices to prevent polluted runoff to these waterways and their watersheds from the cumulative day-to-day truck traffic on this roadway and entrance area, despite the dangerous and, in some cases, hazardous materials being hauled through these locations. Has approval been secured from PennDot and other authorities for the use of the entrance and roadways?
- The permit application materials state that 1,120 gallons of sewage per day will be produced and sent to the Pen Argyl Municipal Authority sanitary sewage system. (PADEP General Information Form, p. 3.) Why is the amount so high? What are the precise sources and uses that are expected to produce this sewage flow? Has Pen Argyl Municipal Authority approved this hookup? What is the alternative plan for sewage and water if the approval isn't secured?
- Why is there no Act 537 Sewage Facilities plan even though it meets the threshold for such a plan? (PADEP General Information Form, p. 5.)
- There will be air emissions from this proposed facility's operations, as stated in the application materials, as well as from diesel truck traffic. (PADEP General Information Form, p. 6.) How will the deposition of air emissions to the ground surface and water be measured and controlled in the stormwater runoff?
- It is stated in the application materials that there will be no storm or wastewater infiltration to groundwater within ½ mile of any "public water supply well, spring or infiltration gallery". However, the quarry pond/sediment basin does infiltrate to groundwater and it is unknown if there is a spring or other infiltration mechanism within ½ mile so this statement is unsubstantiated and may be incorrect.