

To: Pennsylvania Department of Environmental Protection

Re: "Slate Belt Heat Recovery Center" sludge drying plant redrafted stormwater permit (National Pollution Discharge Elimination System Permit No. PA0276120) and the proposed Air Quality Plan (Approval No. 48-00111A)

I am writing in opposition to the above referenced draft permit and proposed plan because I do not consider them to protect the water and air quality of the region. These permits will allow groundwater pollution, stream degradation and air pollution that threatens my and my community's health and the region's environment and natural assets. I request that you deny approval for these proposed permits.

- The Little Bushkill Creek and Waltz Creek will both receive stormwater and groundwater flow from the Synagro sludge plant site. These streams are High Quality/Cold Water Fishery protected waterways under PADEP anti-degradation special protection waters regulations. Brown and brook trout are existing uses in these creeks that are threatened by the discharges and alternatives have not been investigated as required under § 93.4c. "Implementation of antidegradation requirements". I want these streams and the life in them to be protected from degradation.
- The creeks are connected to the abandoned freshwater quarry pond, used as a sediment basin by the Grand Central landfill and Green Knight Energy Center. The sludge plant stormwater is also proposed to go into the basin but the treatment practices proposed are not proven to remove all the pollutants in the runoff. The pollution that enters the pond will end up in the groundwater and Little Bushkill and Waltz Creeks. This is unacceptable! Our water bodies, streams and groundwater need protection and it is your responsibility to provide it.
- Although the revised draft permit requires that additional contaminants must be monitored for, many of the pollutants that can be found in sewage sludge and its process wastewater are not included in the permit. Bacteria, radioactive substances, pharmaceuticals, and the highly toxic per- and polyfluoroalkyl substances (PFAS) are just some of the dangerous contaminants that are found in sewage sludge but are not included in the redrafted permit. These hazardous components put public health at risk and must not be allowed to escape removal requirements.
- The stormwater permit does not require continuous and perpetual monitoring for pollutants. Monitoring will be reduced or can stop altogether after the first year of operation or if no violations are found. When it is required, sampling is infrequent, occurring only quarterly and/or semi-annually. The dangerous constituents of sludge and wastewater require continuous and permanent sampling to catch pollution if it does occur and protect our water and streams.
- If violations do occur at the facility, the correction process is full of holes and is not protective of the environment. The Corrective Action Plan (CAP) says when there is a violation, they would only have to resample at the next stormwater sampling event (quarterly or semi-annually) and only must submit a correction plan (CAP) if the next sampling shows a violation again. Even in that case, the CAP is required within 90 days of the end of the sampling period, not immediately. Even though the permit states that "upfront" action must be taken by the facility to address any exceedance of pollutant limits, this weak CAP process could allow pollution to continue if the action taken by the facility is not adequate. Weeks or months could pass before DEP would get the data, which could lead to contamination of surface water, groundwater, and the environment. It is totally unacceptable for DEP to go easy on violations!

- There are areas where pollution can runoff and no one will ever know it. The access road runoff goes directly into drains that empty into the Little Bushkill and Waltz Creeks without monitoring. Outfall 005 which drains the west side of the facility has a portion where Green Knight and GCSL drainage is mixed in, so DEP is not requiring sampling except if they request it in the future if waste vehicles use the area. Baseline monitoring of all areas of the site and the freshwater quarry pond is not required. Without baseline sampling and comingled waste monitoring, there will be no accountability if pollution occurs. This laxity engenders sloppiness and can allow unchecked pollution. DEP must require the information that is needed to prevent harm.
- Adding to the potential sources of pollution on the site is the untreated wastewater that would be produced by the dryer, transferred to trucks and then hauled to an as-yet undisclosed location with the excess stored on site in a 300,000-gallon silo. Handling and storing the concentrated, potentially toxic wastewater around the clock will mean lots of potential for spills, accidents, leaks and dirty runoff that will be routed to the quarry pond and the streams.
- There is nothing in the draft stormwater permit or the proposed air quality plan that will measure and/or control the hazardous air pollutants that will be emitted from the drying plant and deposited on the ground and surface water. Dust that will be kicked up by trucks and operations can pick up hazardous properties from the air. The accumulation of pollutants such as Sulfuric Acid and Sodium Hydroxide that will be used in the processing and stored on site could be substantial, as well as hydrocarbons and other compounds by the at least 50 diesel trucks and other motor vehicles traveling to and from the facility. Furthermore, particulate matter and ozone precursors proposed for the facility are in violation of clean air standards.

These are some of the reasons I am opposed to DEP approving these proposed permits. I want this community, the region, our water, air and public health to be protected from degradation and harm. I urge that both the redrafted stormwater permit (National Pollution Discharge Elimination System Permit No. PA0276120) and the proposed Air Quality Plan (Approval No. 48-00111A) be denied.