Talking Points and Fact Sheet
Synagro's Slate Belt Heat Recovery Center
Redraft Industrial Stormwater Permit
PADEP "NPDES" PA0276120, published July 13, 2019

Facts

The Pennsylvania Department of Environmental Protection (PADEP) has issued a "redraft" of the proposed permit for industrial stormwater for the proposed Synagro sewage sludge drying plant, which would be located in Plainfield Township next to Pen Argyl, PA. A draft was first issued last year, there was a public comment period through Nov. 21, 2018, and a public hearing was held on the draft permit and other permits for the sludge plant on November 7, 2018. Many public comments were submitted and Synagro revised its application and PADEP issued the "Redraft" to reflect those and Plainfield Township's ongoing review.

PADEP states that the permit has been changed as follows:

- Revised Drainage Areas and Outfall locations (regrading plan changes, revised stormwater controls).
- Enhanced NPDES Monitoring Plan: First year of quarterly monitoring; Outfalls Nos. 001, 002, 004, and 007 shall include monitoring/reporting for 1,1,1-Trichloroethane; 1,1-Dichloroethane; 1,1-Dichloroethene; 1,2-Dibromoethane; 1,2-Dichloroethane; Benzene, cis-1,2-Dichloroethene; Ethyl Benzene; Methylene Chloride; Tetrachloroethene; Toluene; trans-1,2-Dichloroethene; Trichloroethene; Vinyl Chloride, and Xylenes. Outfall No. 004 monitoring will include copper and Nitrate-N monitoring.
- Enhanced Stormwater Best Management Practices (BMPs) including direction of roof drainage to Basin No. 2; stormwater inlet filter inserts; "isolation flip gate" control for Outfall No. 001 to allow capture of spills, leaks, and other releases.
- Part C.VI.C condition expanded to allow submittal of a Standard Operating Procedure (SOP) for discharge of uncontaminated precipitation collected in the thermal heater containment areas.

See the PADEP July 13, 2019 redraft permit public notice here: https://bit.ly/2y02J45
See the **PADEP Hearing Notice** and how to sign up to speak here: https://bit.ly/2Y0kdN9
Review files DRN obtained from PADEP including the redrafted permit and PADEP Fact Sheet here: https://bit.ly/32DstRT

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Talking Points

- **The permit will not prevent pollution.** 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. 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 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. See scientific reports and studies about sludge and "biosolids" here: https://bit.ly/2xBcZjf

- **Water quality monitoring of quarry pond and groundwater not required but must be.** The former quarry pond is named "Sediment Basin 2" in the draft permit. The pond is a Pennsylvania Water of the Commonwealth as per PA Code Title 25, Chapter 102. The pond discharges to groundwater and is hydrologically connected to Little Bushkill Creek and Waltz Creek, waterways protected as High Quality/Cold Water Fishery streams under PA regulations. The redrafted permit says sampling and monitoring will be included in the PADEP Waste Management Permit. However, since that permit is not drafted yet, this permit must require that a groundwater study that identifies the flows, quantity, and quality of the pond and groundwater must be required. These streams cannot be degraded.

- **Not enough monitoring of operations.** Continuous and perpetual monitoring for pollutants is not required. Baseline sampling is to be followed by quarterly monitoring for the first year, then semi-annual monitoring for certain outfalls: 001, 002, 003, and 004. Additional sampling for Volatile Organic Compounds (VOC) is required for outfalls 001, 002, 004, and 007 for the first year only unless PADEP requires otherwise due to violations. At outfall 004, copper and nitrate-N have been added for the first year or upon request by PADEP. Essentially, monitoring will be reduced or will sunset for certain dangerous pollutants after the first year of operation.

- **Weak correction process of violations.** The Corrective Action Plan (CAP) process required due to a stormwater permit violation of pollution limits is weak. According to the permit, the facility does not have to immediately resample in the event of a violation of the permit parameters. If a permit limit for a pollutant is exceeded, the facility would only have to resample at the next stormwater sampling event (quarterly or semi-annually) and only must submit a 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. However, the permit states that "upfront" action must be taken by the facility to address any exceedance of pollutant limits to correct noncompliance or they will be subject to enforcement. Regardless, this could allow pollution to continue if the action taken by the facility is not adequate and PADEP would not see the data to prove the correction for weeks or possibly months after the violation. This weakness in the CAP process could lead to contamination of surface water, groundwater, and the environment.

- **Incomplete stormwater treatment.** There are still areas where stormwater runoff will not be monitored or will be monitored only semi-annually, opening up the potential for pollution that will be undetected and cause degradation of water quality. For instance:
    - The access road runoff that runs to the Grand Central Sanitary Landfill (GCSL) stormwater inlets and best management practices (BMP) is identified as outfall 008 but monitoring will only be required upon request. This road and entrance would be used by the sludge drying plant trucks every day.
    - 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. However, this allows the potential for unmonitored polluted runoff to enter the stormwater inlet to the quarry pond (sediment basin No. 2) and, even if it were requested, it would only be semi-annual monitoring. The mixing of sources is no excuse to ignore potential pollution.
    - Outfall 006 that drains active material handling and site activities discharges to an unnamed tributary of the Little Bushkill Creek, a High Quality waterway protected by antidegradation requirements. Only semiannual monitoring is required.
    - The requirement for background sampling of all areas that will be used by the plant (the site and ingress/egress routes) prior to start-up has been dropped and only some areas require this sampling to establish baseline conditions. Without background monitoring, it will be difficult to establish baseline conditions prior so that any new pollution sources can be traced to the responsible party. This could lead to a lack of clear accountability for pollution.

- **Degradation of Streams and Groundwater will violate state regulatory protections.** Under Pennsylvania's Special Protection Waters Program, the Little Bushkill Creek is designated as a High Quality Creek, Cold Water Fishery that cannot be degraded. Both the groundwater connection to the Little Bushkill from the quarry pond and the surface drain on the access road on which the sludge trucks would travel discharge to the Little Bushkill Creek, carrying pollution that will harm the creek and the life in it. Synagro has not even performed the required anti-degradation analysis they must do if they want to locate the sludge plant there. Waltz Creek is also High Quality and a Cold Water Fishery with reproducing trout its entire length. That existing use is protected by law and under 25 Pa. Code Section 93.3 Table 1, brown and brook trout must be protected but instead will be exposed to polluted runoff and discharges from the quarry pond where stormwater runoff is supposed to be contained. We cannot tolerate and regulations do not allow the degradation of these protected streams.

Additional facts/information:

- **SAFETY CONCERNS.** Explosions and fires have occurred and continue to occur at Synagro sludge facilities, raising substantial safety issues. As recently as August 2 of this year a Synagro "…machine used to dry wastewater sludge and turn it into pellets" in Stamford, Connecticut exploded, sending three people to the hospital. (https://m.stamfordadvocate.com/local/article/Explosion-at-Stamford-Water-Pollution-

Control-14275125.php). Other explosions have occurred at: Synagro's Bronx facility between 2003 and 2005; their Hawaii facility between 2003 and 2007; in 2016 at Synagro's pellet plant in South Baltimore MD; and a fire broke out at their Hagerstown MD drying facility in 2006 and an explosion occurred there in 2007. The danger of explosion and fire is obviously not abated by Synagro and poses new threats to residents and the region.

- Synagro's projected startup date for SBHRC: September 2020

- 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, totaling 50 truck trips per day. This does not count employees and other services at the facility.

- An enormous amount of truck traffic currently enters and leaves the Grand Central Sanitary Landfill through the State Rt. 512 entrance every day. Sewage sludge and garbage is currently trucked into the landfill for disposal on the same road through this entrance. These additional diesel trucks wind their way along local roads and now will have to maneuver around this tight site sandwiched between the quarry pond, the Green Knight Energy Facility, and all the components of the sludge plant. It's too much!

- The wastewater produced from the drying of the sewage cannot be discharged locally because it is too polluted. "Possum belly" tank trucks are planned by Synagro to be used to carry the wastewater in the bottom of the truck to a location off site with the top part of the trucks used to haul the sewage sludge into the facility. This means lots of concentrated sewage wastewater will have to be constantly handled at the site and also stored in a 300,000-gallon silo because the drying plant will operate 24 hours per day but trucks are limited to 6am to 6pm. Pollution that comes off the constant stream of trucks and all the operations that would occur at the drying plant will end up in the local environment. In addition, we do not even know where the wastewater will ultimately be disposed since Synagro has not produced contracts from wastewater facilities; do we really want hundreds of thousands of gallons of polluted, untreated sewage wastewater handled and stockpiled here? This is not a responsible plan. The impacts will be borne by the local community, Pen Argyl and Plainfield Twp., and those who live along the truck routes. How is this fair?

- How will the deposition of air emissions to the ground surface and water be measured and controlled in the stormwater runoff? The proposed Air Quality Plan identifies hazardous air pollutants that will be released by the facility, as well as by the diesel trucks.

- It is stated in the application materials that there will be no stormwater 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. This issue must be resolved when the hydrogeological study is conducted. There is no excuse for a thorough study not to have already been completed. We need science not estimates!

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