

# TOWNSHIP OF FLORENCE

December 18, 2014

Governor Chris Christie  
Office of Governor  
PO Box 001  
Trenton, NJ 08625

Dear Governor Christie:

As you may be aware, Elcon Recycling Services is proposing to construct a commercial hazardous waste treatment facility in the Keystone Industrial Port Complex located in Falls Township, Pennsylvania. Elcon is seeking what the DEP calls Siting approval from the state. This is a preliminary regulatory approval, and does not negate all of the applications that must be submitted and approved to DEP or Falls Township. What is disconcerting about the application is that it was not widely known, and the public hearing held by the DEP on December 10, 2014 did not really allow the public adequate time to gain true insight into this proposal.

There was no written information handed out at the December 10<sup>th</sup> meeting, but the DEP did direct everyone to the power point presentation on their website. Unfortunately, at the public meeting, the power point information was not visible to the majority of the public. The power point presentation can be accessed at [RA-HazWaste@pa.gov](mailto:RA-HazWaste@pa.gov).

The DEP is holding only one public hearing for a facility that will process commercial hazardous waste from the chemical and pharmaceutical industry. To make matters worse, the DEP is requiring that all comments be submitted to their office no later than December 26, 2014. This is an inadequate period of time for citizens in New Jersey and Pennsylvania to review information on this proposed hazardous waste treatment facility. Based on the lack of time to gather information and ask meaningful questions, how can anyone make an informed decision about a facility that could negatively impact the lives of residents in two states for years to come?

Florence Township passed the enclosed Resolution (2014-254) last night requesting that the DEP extend its comment period so that concerned citizens in Pennsylvania and New Jersey can have more time to gain knowledge about the proposed hazardous waste facility in Falls

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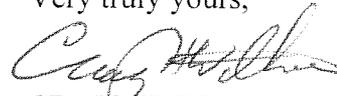


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Township. It is unfair for the DEP to make a decision on the Siting location without seeking input from the public in a reasonable manner. One public meeting with approximately 30 minutes allowed for questions is unfair and unreasonable to residents of Pennsylvania and New Jersey.

Florence Township is asking the State of New Jersey and the NJDEP to evaluate the proposed hazardous waste treatment facility that Elcon wants to construct in Falls Township, Pennsylvania, not far from the Delaware River and New Jersey municipalities. We are opposed to the chemical waste treatment facility because it could negatively impact the future for residents who live in all of the below listed communities. We respectfully ask that the state use its expertise to assist us in opposing this proposal so that residents in New Jersey and also Pennsylvania can rest assured that their quality of life and the environment will not be compromised by a chemical hazardous waste treatment facility near the Delaware River.

Very truly yours,



CRAIG H. WILKIE

Mayor

Enclosures

cc: Florence Township Council  
Florence Township Administrator  
Mayor Randy H. Miller, City of Beverly  
Mayor Joseph R. Malone, III, City of Bordentown  
Mayor Stephen Benowitz, Bordentown Township  
Mayor Dr. James A. Fazzino, City of Burlington  
Mayor Brian J. Carlin, Burlington Township  
Mayor Anthony Minniti, Cinnaminson Township  
Mayor Bill Dillenbeck, Delanco Township  
Mayor Thomas Pullion, Edgewater Park Township  
Mayor Karen A. Scheffler, Esq., Borough of Palmyra  
Mayor George Conrad, Sr., Riverside Township  
Mayor Eddie Campbell, Township of Willingboro  
Commissioner of NJDEP, Bob Martin

**RESOLUTION 2014-254**

**OPPOSITION TO PROPOSED HAZARDOUS WASTE TREATMENT FACILITY IN KEYSTONE INDUSTRIAL PORT COMPLEX IN FALLS TOWNSHIP BUCKS COUNTY, PENNSYLVANIA**

**WHEREAS**, on December 10, 2014 the Pennsylvania Department of Environmental Protection (DEP) hosted a public meeting and hearing regarding a commercial hazardous waste treatment facility proposed by Elcon Recycling Services to be located in the Keystone Industrial Port Complex in Falls Township, Bucks County Pennsylvania; and

**WHEREAS**, the DEP states that this operation is a commercial hazardous waste treatment facility, and that it will treat liquid waste from the chemical and pharmaceutical industry; and

**WHEREAS**, the DEP in their informational press release and at the December 10 meeting said that Elcon Recycling Services has offices in Princeton, New Jersey and has submitted an application for a Phase 1 siting review approval or permit; and

**WHEREAS**, the Phase 1 siting criteria is “in place to prohibit the location of hazardous waste treatment facilities under certain criteria”; and

**WHEREAS**, the public meeting was supposed to provide an opportunity for public participation but in reality, such participation for questions from the public was very limited and insufficient for the public to gain true insight and details into the proposed hazardous waste treatment facility; and

**WHEREAS**, it was evident from the public meeting that some residents and local governmental officials, including some from Pennsylvania only heard about the meeting at the last minute and this greatly restricted their ability to gather detailed information concerning a proposal that could have long-term impact on residents in both Pennsylvania and New Jersey; and

**WHEREAS**, there was no written detailed information distributed to the public concerning the waste matter, air emissions, discharges to the Delaware River or precautions that will be taken to protect residents in Pennsylvania and New Jersey; and

**WHEREAS**, the DEP and the applicant, Elcon has provided very little time for concerned members of the public and governmental officials to review and comment on the application before the December 26, 2014 deadline for submittal of testimony, and this lack of time is unreasonable and unfair for an application involving a hazardous waste treatment facility.

**NOW, THEREFORE BE IT RESOLVED**, by the Council of the Township of Florence, County of Burlington, State of New Jersey, as follows:

1. That the DEP is hereby requested to extend its December 26, 2014 deadline date for public comments so that concerned parties in New Jersey and Pennsylvania can have adequate time to review and submit written concerns.

2. That the Township of Florence has concerns for not only air emissions, discharges to the Delaware River and the impact on the quality of life for residents in Pennsylvania and New Jersey, but also about the potential impact on municipal potable drinking wells.

3. That the inadequate time provided for public review and comments leaves the Township of Florence with no other option at this time except to oppose the hazardous treatment facility and to implore the DEP to hold more public informational hearings as part of the Phase 1 siting review for residents in both states.

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I, JOY M. WEILER, Clerk of the Township of Florence, County of Burlington, State of New Jersey, do hereby certify that the foregoing Resolution is a true copy of the Resolution approved by the Township Council at their December 17, 2014 meeting.

  
JOY M. WEILER, RMC/MMC

**Note:**

*This Resolution asks the Pennsylvania Department of Environmental Protection to extend the public comment period beyond December 26, 2014 and also opposes the proposed hazardous waste treatment facility proposed for Falls Township, Pennsylvania.*