



# TOWNSHIP OF FLORENCE

October 13, 2015

Hazardous Waste Facility Siting Team Leader  
Pennsylvania Department of Environmental Protection  
2 East Main Street  
Norristown, PA 19401

Re: Elcon Recycling Services, LLC Application  
Proposed Hazardous Waste Storage and Treatment Facility

On behalf of Florence Township and its residents, I am filing this response to Elcon's proposal to construct a commercial hazardous waste storage and treatment facility in Falls Township, Pennsylvania.

Florence Township has serious reservations about Elcon's proposal, and the recent public information session and public hearing did not result in Elcon putting to rest the many concerns of residents and environmental organizations. Placing a commercial hazardous waste treatment facility ½ mile from the Delaware River and within such close proximity to residents in Pennsylvania and New Jersey is risky and reckless. Our allegiance as people who work in government should always be to the residents of our respective states. Changing the landscape near the Delaware River to develop a commercial hazardous waste treatment facility increases the likelihood of damaging the environment and quality of life for people in Pennsylvania and New Jersey.

I share the floodplain concerns expressed by the Delaware Riverkeeper Network. The Pennsylvania Department of Environmental Protection (DEP) has every right to examine what the potential impact to our environment with the impacts of flooding frequency and severity. Placing a chemical waste treatment facility so close to one of our region's most vital waterways warrants the DEP's in-depth scrutiny.

The Phase 1 Siting criteria calls for Water Supply to be considered as one of the applicable criteria. Yet for reasons that are still bewildering, it appears as if Elcon is trying to exempt itself from a Water Supply review. Elcon is a company untested in the United States. They are trying to build a chemical hazardous waste facility a ½ mile from the Delaware River; in the vicinity of population districts in two states; and not far from water systems that are relied upon to provide potable water. And yet, Elcon seeks to have the importance of Water Supply minimized as an important review criteria. This is a commercial hazardous waste facility proposing to treat approximately 175,000 tons of waste each year. Water Supply is and should be a vital part of the criteria used by the DEP to examine the Elcon proposal. Ignoring Water Supply is the equivalent of giving a hazardous waste treatment facility operator the right to ignore one of our most precious resources in life.

FLORENCE TOWNSHIP MUNICIPAL COMPLEX  
711 BROAD STREET  
FLORENCE, NEW JERSEY 08518-2323  
WWW.FLORENCE-NJ.GOV



(609) 499-2525 ADMINISTRATIVE OFFICES  
(609) 499-2222 MUNICIPAL COURT  
(609) 499-3131 POLICE DEPARTMENT  
(609) 499-2130 CONSTRUCTION CODE OFFICIAL

Hazardous Waste Facility Siting Team Leader  
Proposed Hazardous Waste Storage and Treatment Facility  
October 13, 2015  
Page -2-

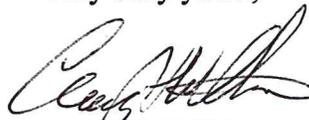
It is disconcerting how Elcon is now trying to portray itself as not being water dependent, but they are still pushing to construct a commercial hazardous waste treatment facility a ½ mile from the Delaware River and other important ecological areas. It makes no sense to locate at the Falls Township location, and so close to a beautiful waterway that links Pennsylvania and New Jersey dating back to a time well before the formation of the United States of America.

Another very serious concern that could impact wetlands, the health and safety of the public and the environment is the transportation of enormous amounts of hazardous waste proposed to be delivered to this facility. While residents have asked about transportation plans and expressed legitimate concerns about the use of trucks, truck routes and rail car routes, the information provided by Elcon at the two public meetings has not fully addressed the concerns of the public in a detailed and informational manner. If railcars will be used to transport hazardous waste, then there should be an examination of the potential impact on the wetlands buffer areas along the way. Using a rail path for tankers filled with hazardous waste that travels through or near wetlands is certainly a Siting Criteria that warrants justifiable scrutiny. Railcars passing near or through wetlands pose a risk to the environment and the impact could be catastrophic.

At the September 30<sup>th</sup> public hearing, questions from the public were raised about the compliance track record of Elcon facilities operating in Israel. Since Elcon has no hazardous waste treatment facilities in the United States, I urge the DEP to assess Elcon's track record in Israel. This is a fair request, and one which Elcon should readily welcome on the part of the DEP.

Finally, Elcon is applying to accept approximately 596 different kinds of waste at their hazardous waste treatment facility. The proximity to wetlands, the Delaware River and a significant population in Pennsylvania and New Jersey is alarming. The information provided to the public to date does not warrant an approval by the DEP. Florence Township opposes Elcon's proposal because it is not only ill-advised, but it has lacked the sharing of credible information to support its need at this location. As public officials, we should not sacrifice the health and well-being of future generations for the construction of a commercial hazardous waste treatment facility a ½ mile from the Delaware River.

Very truly yours,



Craig H. Wilkie  
Mayor

Cc: Governor Tom Wolf  
Robert Martin, NJDEP Commissioner