

May 3, 2024

AERC Recycling Solutions
c/o Ms. Shannon Crawford, Area Environmental Manager
2591 Mitchell Avenue
Allentown, PA 18103
Via email: scrawford@cleanearthinc.com

Re: Technical Deficiency Letter
General Permit Application
AERC Recycling Solutions
Application No. WMGR081-NE005
APS ID#: 1099933, AUTH ID#: 1460046
City of Allentown, Lehigh County

Dear Ms. Crawford:

The Department of Environmental Protection (DEP) has reviewed the above referenced permit modification of General Permit WMGR081-NE005. The DEP has identified the following deficiencies. The deficiencies are based on applicable laws and regulations.

Deficiencies

1. Form E-GP – Contractual Consent of Landowner

- The signature on this form is dated for October 6, 2024. Please revise this answer.

2. Form HW-C – Compliance History

- “The type of permit submittal is incorrectly identified as “Other: Enviri Name Change”. The “Renewal” block should be checked.
- Section A.1 – The full name of the applicant should be identified.
- Section A.2 – The applicant is identified elsewhere in the application and in Attachment A as a corporation but is identified as a Limited Liability Company in this section. This section should be revised to reflect that the applicant is a corporation.
- Section B.1.a-c is answered as “N/A”; however, Attachment A “Corporate Structure” indicates that the applicant is a corporation or a division of a corporation. As such, Section B.1.a-c should be completed with the requested information.
- Section B.2 – please identify the principals and corporate officers of the applicant, as well as any other related parties.

- Section B.6 is marked “N/A”; however, Section B.6.a and B.6.b are subsequently answered. This answer should be revised by removing “N/A”, as this Section is applicable.
- Section D – Only 5 years of compliance history is provided; Please provide a 10-year compliance history, as applicable.
- The form was only signed by one individual. The form should be signed by two authorized representatives.”

3. Contingency Plan

- PA DEP Central Office contact should be updated. The current contacts should be: Chris Solloway, Program Manager, telephone number: 717-787-7381/email: csolloway@pa.gov and Jason Dunham, Environmental Group Manager, telephone number: 717-787-1982/email: jadunham@pa.gov.
- PA DEP Northeast Regional Office contact should be updated. The current contact should be Roger Bellas, Program Manager, telephone number: 570-826-2201/email: rbellas@pa.gov.

You must submit a response fully addressing each of the significant technical deficiencies set forth above within 60 calendar days or the DEP may deny the application.

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to the deficiency, you have the option of asking the DEP to decide based on the information regarding the subject matter of that deficiency that you have already made available. If you choose this option regarding any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be denied.

Should you have any questions regarding the identified deficiencies, please contact Bradley Lester at bralester@pa.gov or (570) 820-4841.

Sincerely,

David F. Matcho

David F. Matcho, P.E.
Environmental Engineering Manager
Waste Management Program

cc: Lehigh County (via email: commissionersoffice@lehighcounty.org)
Lehigh Valley Planning Commission (via email: srockwell@lvpc.org)
City of Allentown (via email: Michael.Hanlon@AllentownPA.gov)