

**PLAINFIELD TOWNSHIP  
PLANNING COMMISSION SPECIAL MEETING  
APRIL 17, 2019**

A special meeting of the Plainfield Township Planning Commission was held on Monday, April 17, 2019 at the Plainfield Township Volunteer Fire Company Banquet Facility located at 6480 Sullivan Trail, Wind Gap, PA, 18091.

Chairman, Paul Levits, called the meeting to order at 7:00 P.M.

The Pledge of Allegiance was performed.

**ROLL CALL:**

The following Commissioners answered roll call: Chairman, Paul Levits, Vice Chairman, Robert Simpson, Robin Dingle and Terry Kleintop. Mr. Jeffrey Beavan was excused from the meeting.

Also present were Secretary, Paige Stefanelli, Township Manager, Tom Petrucci, Zoning Officer, John Lezoche, Solicitor, David Backenstoe, Esq., Special Environmental Legal Counsel, John Embick, Esq., Special Environmental Engineering Consultant, Michael Brunamonti, P.E., Alternate Township Engineer, Farley Fry, P.E., Alternate Township Engineer, Robert Lynn, P.E. and Special Environmental/Wetlands Consultant, Mr. Jason Smith, PWS.

**NEW BUSINESS:**

**1. GRAND CENTRAL SANITARY LANDFILL, INC. (PEN ARGYL ROAD, PEN ARGYL, PA 18072) SLATE BELT HEAT RECOVERY CENTER PROPOSED LAND DEVELOPMENT PLAN:**

The Planning Commission acknowledged the fact that Grand Central Sanitary Landfill Slate Belt Heat Recovery Center has received an Extension of Time through May 31, 2019. Mr. Levits allowed for Plainfield Township's Consultants to review their letters pertaining to the outstanding items in regards to Synagro's application.

Mr. Peter Terry from Benchmark Engineering read over his review letter verbatim. The Benchmark Engineering Review Letter dated April 3, 2019 by Mr. Peter Terry is hereby incorporated for reference in these minutes as though it were more fully set forth at length as "Exhibit A". Mr. Terry noted that there were four (4) remaining issues yet to be addressed. One major issue is the driveway location. The design of the driveway needs to be readdressed and designed better. He added that there were plans recently submitted but did not have any changes made to the design. The trip generation was resubmitted to PennDOT and are currently awaiting comments from PennDOT regarding the submission. Mr. Hecht stated that the applicant does not have the traffic expert present at

the meeting and they are expecting to hear back from PennDOT in the beginning of May 2019.

Mr. Jason Smith from Hanover Engineering went through his review from an email written to Mr. Petrucci dated April 9, 2019 and is hereby incorporated for reference in these minutes as though it were more fully set forth at length as “Exhibit B”.

Mr. Tom Pullar with EarthRes stated that the issues stated by Mr. Smith have been previously addressed. There are specific items that the applicant and Mr. Smith disagree with. Ms. Pam Racey questioned whether there was anything on Mr. Smith’s list that is not related to the sedimentation pond. Mr. Smith noted there are some drafting issues and maintenance issues that need to be addressed. Ms. Dingle and Mr. Kleintop noted that there are comments within the letter stating technical deficiencies with the submission. The DEP is concerned on the design of the pond/sedimentation basin. Ms. Dingle added that this body of water was not designed as a sedimentation basin. Mr. Pullar noted that he does not have all answers at this time with respect to the latest DEP letter.

Mr. Simpson questioned filling in the pond and whether it would meet the Township’s Ordinance. Mr. Smith noted that this would be up to the Township for interpretation. In Mr. Smith’s opinion, it would not meet the Zoning Ordinance. Mr. Pullar added that the basin changes were already completed and approved by the DEP. Mr. Simpson questioned Mr. Pullar on how the applicant plans on resolving the water table issue. Mr. Pullar is unsure and will leave it as a disagreement at this time. Ms. Racey added that the items being discussed by the DEP are not requirements, rather, they are recommendations and she wanted to make that clear. The applicant will meet with representatives of the DEP in order to discuss the possibility of obtaining relief from this issue.

In reference to the quarry/body of water on the property, Mr. Kleintop questioned how the applicant will determine the current depth of the body of water as it stands today. He noted the quarry is still quite wide. He also questioned how the base will be raised. Mr. Kleintop noted the only way he sees plausible is to bring in large amounts of fill and placing the fill directly in the middle of the basin. The applicant noted that the exact depth of the basin is not known but can be calculated.

Ms. Dingle stated that certain things that were permitted many years ago are not permitted in the same way as it is today. She added that the process today is much more complicated. Mr. Hecht noted that they are working towards satisfying the DEP. Ms. Dingle added that the Planning Commission has been asking many questions over the past few meetings and requested a lot of additional information. Such information will now be required by the DEP because they are now asking the same questions. This is now necessary to obtain for the Planning Commission’s review considering the DEP is now requesting the same information. Ms. Dingle and Mr. Simpson added that the

Planning Commission does in fact have authority in both the Zoning Ordinance and the Plainfield Township SALDO to request information by the applicant. With respect to §27-1401.A and §27-1401.B, these sections provide authority for the Planning Commission to ask *and require* specific information for the application to obtain for proper consideration and review. Mr. Hecht noted that the applicant has been following the state process. All applications submitted on behalf of the applicant have been provided to the Township. The applicant noted they have also been addressing comments by the Conservation District.

The applicant stated that their position is that they have submitted all required documents and that they have complied with all requirements with Plainfield Township. The DEP application submitted is still under review. Mr. Simpson noted that he does not want to be in a position where the Planning Commission has to make a decision based on something being in the hands of the DEP. Solicitor Backenstoe added that the Planning Commission may not have a favorable determination/recommendation if they do not have all of the information as requested. Solicitor Backenstoe questioned Mr. Pullar on what the estimated depth is for the pond. Mr. Pullar noted it is approximately 60 feet deep once all improvements have been made to the basin. He is projecting the depth based on what the side slopes will be as material is placed. Additional material may be added at a later time. Ms. Dingle noted that the current model provided is not sufficient for their review. She requested that specific depth measurements of the area are included on the model. The Planning Commission requested that only hard data is submitted and nothing hypothetical.

Mr. Jason Smith read over #8 of his most recent review letter verbatim. The Hanover Engineering Review Letter dated April 15, 2019 by Mr. Jason Smith is hereby incorporated for reference in these minutes as though it were more fully set forth at length as “Exhibit C”. Mr. Pullar will clarify this item with Mr. Smith at a later date once he gathers all necessary information. Mr. Petrucci requested Ms. Racey to include the Township in the meeting with DEP regarding working out the latest comments/deficiencies.

Mr. Smith questioned the applicant on whether the basin would be lined after the fill is placed in order to have a barrier between the water and ground water below the fill. Mr. Pullar noted there is no liner proposed at this time. Mr. Pullar added that many of the items within Mr. Smith’s review letter need to be met/discussed with the DEP. Additionally, Hydrogeological plans were submitted for Mr. Brunamonte’s review by the applicant.

Mr. Michael Brunamonte from BCM Engineers noted that he has received additional information from the applicant regarding comments on the hydrogeological plan. Since then, Mr. Brunamonte generated a new review letter. In reference to the stormwater

permit, there has been a draft permit that has been issued. Mr. Brunamonte added that there are still comments where the applicant's response was "item will be addressed in Nuisance Mitigation Control Plan". He requested an inventory of where to locate those answers to his comments within the Nuisance Mitigation Control Plan. He will also provide the Township with a review letter notating the remaining issues regarding the proposed facility. Mr. Simpson questioned whether the applicant submitted a complete hydrogeological evaluation/study. Mr. Brunamonte noted that he received a packet regarding hydrogeological information and based on what was reviewed, items on his review letter were still outstanding. Mr. Brunamonte noted that the pond has a connection to groundwater and he has concerns about that. He added that this is very different discharge from the norm. He requested that there are extra precautions put in place to ensure that if an issue were to occur on the property, that the problem can be identified and rectified as efficiently as possible.

Mr. Simpson questioned about the constituents of sludge at the facility. Mr. Brunamonte noted that whatever parameters are included within the DEP response, those are the constituents that will be monitored. Mr. Pullar is in agreement with most comments within Mr. Brunamonte's review letter. He noted that background monitoring will take place with both the landfill and their facility. Mr. Pullar stated the NPDES permit requirements is beyond what the DEP requires and there are mechanisms within that permit that will require corrective actions by the applicant. Ms. Dingle noted that if the applicant does testing every few months and finds an issue with the testing results, its possible that the issue was affecting nearby waters for some time. Because this is directly connected to groundwater and nearby waterway's, she requested that testing be completed more frequently. Mr. Pullar stated that the facility will need to discuss that issue.

Mr. Pullar noted that in reference to background monitoring, there are no direct numbers that the applicant has at the moment. This is a topic that has been previously discussed but the applicant has not reached an agreement at this time. Ms. Dingle stated that the wells would be in place to provide more precise data measurements. She added that having this facility is still a threat to resident's ground water and their well water. Ms. Dingle recommended that a liner be put in sedimentation basin #2 once it has been filled as an option for extra protection from pollution of groundwater. Mr. Brunamonte noted that the monitoring wells will provide a snapshot of any issues that may occur. Ms. Racey wanted it to be clear that the sedimentation basin has already been approved and permitted. She added that the facility will be in an enclosed building. Mr. Kleintop stated that because the fill will be very newly placed, it will also be quite porous. He added that there is a potential risk for contamination of the Township's waters if a spill were to occur. Ms. Dingle stated that most residents have wells in the community and the facility

is located within the vicinity of high quality streams. Ms. Dingle stated that this is a very poorly sited area for a facility such as this.

Mr. Kleintop stated his concerns with a nearby issue with Nestle Waters. He noted that there was a serious contamination issue that has yet to be resolved to this day. In reference to well location maps that were provided to Mr. Brunamonte from the applicant, Mr. Kleintop questioned how many wells were located on the map. Mr. Pullar noted that the wells on the map have been indicated as close proximity of the landfill. Such wells are already being tested. Additional well monitoring and their locations are still being discussed by the applicant. Mr. Brunamonte stated that additional well testing is being recommended as an additional safety option.

Mr. Pullar stated that the site drainage has been revised. In terms of the well monitoring, he agrees to the recommended increase frequency of testing. Mr. Pullar noted that they have received a General Permit deficiency letter which the applicant is currently working to rectify the issues identified. Mr. Brian Cataldo noted that they have created an enhanced BMP which has sheath flow across the proposed parking lot along with a regraded area. With the revisions, all flow will now be monitored on the proposed lot. Mr. Jason Smith recommended baseline monitoring in order to identify current data. Mr. Smith also requested lower levels for testing baselines. Additionally, he would like to see monitoring take place before and after filling the sedimentation basin.

Mr. Robert Lynn from Benchmark Engineering stated that he has nothing new to address as there have been no recent submissions by the applicant. Mr. Jim Hecht stated that they are currently preparing to submit a response to his review letter. Mr. Hecht requested that all engineers and consultants put together a list of all outstanding items and submit it to the applicant. Mr. Brunamonte stressed the applicant to indicate where in the submission documents the consultants can find information regarding their comments. Mr. Simpson would like the applicant to provide information on how the stormwater issues are going to be addressed within the next month. Mr. Pullar will review the calculations.

Ms. Trudy Johnston from Material Matters noted that in reference to the DEP Deficiency Letter, she is currently in the process of reviewing the letter. Synagro has 60 days to respond to the letter. Ms. Johnston held a conference call with representatives of Synagro on April 3, 2019 to discuss modifications to their Nuisance Mitigation Control Plan. She also requested additional information from the applicant as well. The Material Matters Review Letter dated April 15, 2019 by Ms. Trudy Johnston is hereby incorporated for reference in these minutes as though it were more fully set forth at length as "Exhibit D".

Ms. Johnston referenced charts from her review letter and identified sections that were "parts per million" for scales. She requested for all tables provided by the applicant to be finalized. Ms. Johnston questioned whether other employees (other than employees of

Synagro) will be performing daily monitoring testing. Mr. Simpson questioned whether Ms. Johnston is in full agreement with all issues? Ms. Johnston noted that there are still major outstanding items that need to be addressed. Mr. Simpson noted to Mr. Jim Hecht that he is concerned about the possible odors that can emit from the trucks and how these types of issues can be properly mitigated. Mr. Hecht noted that no one will be able to smell odors from the trucks if they are sitting in their vehicles behind the truck. Ms. Johnston stated that the applicant is approximately 80% in compliance with the standards set forth by Material Matters for the Nuisance Mitigation Control Plan. Mr. Hecht added that mitigation matters regarding odors will be included in the Nuisance Mitigation Control Plan.

Mr. Jim Hecht presented a PowerPoint to the Planning Commission regarding the Nuisance Mitigation Control Plan. Mr. Hecht explained the flow chart and their proposed mitigation strategies. In reference to the additional requested information by Material Matters, such information will be provided. The applicant is attempting to identify the potential for any and all odor issues. Mr. Hecht generated a detailed checklist and summary chart for the Planning Commission as well. When the applicant is replying to an issue, there will be specific chart schedule on how the matter will be handled. Such information on the chart includes what they do at the time of a complaint, who they notify, the time and day of when everything is done, and measures taken in order to alleviate the issue. Once a complaint has been submitted, the applicant will take immediate action and will go by the chart on how it will be managed. If the source of the complaint cannot be identified, the issue will then be tracked down by a panel of individuals. A corrective action plan may take place if the source of the issue cannot be identified. All documents regarding complaints will be well detailed and documented. The Township will be notified on all instances. Ms. Dingle noted that she has some concerns regarding the length of time between certain corrective actions within the chart. She would like to see immediate action be taken. She also requested that more direct communication be taken with the resident who submitted the complaint.

Mr. Terry Kleintop questioned Ms. Pam Racey regarding other Synagro locations. Ms. Racey noted that all locations have internal operations at the facility. Additionally, at the plant located in Florida, trucks transport biosolids. There are approximately 6 to 8 trucks daily. Out of their other facilities, one of the facilities does incineration work and the other does compost work. The one has approximately 40 to 50 trucks per day and the other facility has approximately 12 to 18 trucks per day. Additionally, Ms. Racey stated that the Florida site takes inbound material and has material going outbound. Additionally, they have the same type of drying process. Mr. Kleintop noted about a facility in Hunts River. He noted that Synagro purchased the property with the facility already existing. There were many known issues for that location in terms of odors. Ms. Racey stated that the design had to be changed and different technology had to be used

for the odor control system. There were technical issues with that facility. Ms. Racey added that the facility closed due to an economic standpoint. She added that they really went down on the amount per ton per day and as a result, the facility had to close. They did not shut down due to odors.

Chairman, Paul Levits, provided a short break from 9:15 P.M. to 9:20 P.M.

Special Environmental Legal Counsel, Attorney Embick, stated to the Planning Commission that both the Zoning Ordinance and Subdivision and Land Development Ordinance (SALDO) and provisions of the Pennsylvania Constitution provide ample authority for this evaluation and requests for additional information. If the Planning Commission does not receive the information requested, then the Planning Commission has the right to recommend denial. Attorney Goodrich on behalf of the applicant will submit legal memorandum which will address those issues.

Ms. Racey questioned whether the applicant should wait to respond to the review letters until a list has been received from the Township on all outstanding items to date from all consultants/engineers. Mr. Petrucci noted that the applicant will receive a condensed correspondence with all remaining items to be addressed by the applicant.

#### **PUBLIC COMMENT:**

*Peter Layman*- Mr. Layman appreciates the detailed review by the Planning Commission. He noted he is concerned about the odors that may emit from this site. He stated that there is no question that progress has been made. Currently, it does not seem as though that the applicant has an enforceable and clear Nuisance Mitigation Control Plan. Ms. Johnston stated Mr. Layman is correct because she is looking for additional detail on methods and performance standards. Ms. Johnston added that there are still significant issues outstanding. Odors can be expected from this type of facility. Mr. Layman noted that he is disappointed to hear that May 31, 2019 is the deadline when many responses are still required. He added that this is a self-inflicted issue.

*Howard Klein*- Mr. Klein questioned Ms. Johnston on who is all present during conference calls. He also noted that he did not understand the presentation. Mr. Klein mentioned issues with PFAS and questioned what the applicant plans on doing about the issue. Ms. Racey stated that they will continue to monitor industry groups and regulators to assess whether there are any new hazards to be aware of/regulate. Mr. Kline questioned whether she is aware of Maine and Wisconsin. Ms. Racey noted that those states are putting standards in place to regulate PFAS. Mr. Klein noted stated that these are not only in the ground but are in biosolids too. Mr. Klein suggested the applicant to look into the matter and to install filters for well testing.

Gerald Lennon- Mr. Lennon has concerns with the possible odors and those odors spreading across the entire Township. He also noted that the air currents and weather conditions have a big impact on the odors. He stressed to Grand Central and Synagro to have an airflow map done. Mr. Lennon also requested a safety data sheet. Ms. Racey noted that they do have labels for all products that are sold but not for inbound biosolids.

Alec Colquhoun- Mr. Colquhoun questioned whether the well monitoring is a safety measure to ensure there will be no issues with well water quality. Mr. Brunamonte stated the intent is to monitor the impacts that the facility may have on nearby wells. This is a necessary safety measure as it provides another layer of assurance. Mr. Jason Smith added that there are many factors to go into that decision. Mr. Colquhoun questioned if the applicant can provide three additional facilities that they own that have the same production/machinery. Ms. Racey stated that there are facilities in Florida, Honolulu, and Philadelphia. Baltimore, Maryland also has facilities. She noted they have the same concept, however, the facilities do not use the exact dryer that they are proposing for this facility. Mr. Colquhoun questioned which facility would be the closest to what they are proposing for this site. Ms. Racey stated that Philadelphia is close to scale but is a larger facility. She added that the main facility in Maryland will be using the same technology as the one currently being proposed.

Don Moore- Mr. Moore questioned the exact locations of two facilities that were mentioned. Ms. Racey stated that there is one in Charlotte County, Florida and one in Waterbury, Connecticut. Mr. Moore questioned whether it is the same material as what will be used at this proposed facility. Ms. Racey stated that most material that will come to this facility will likely already be digested. Most materials at the other facilities has material that is undigested.

In reference to the hydrogeological study, Mr. Moore questioned whether the applicant intends to perform one. Ms. Racey noted that they prepared a study and has been provided to the Township. Mr. Jim Hecht noted that they were asked to interact with the consultants directly and noted that he was told that what they provided was reasonable and adequate to start proposing safe guards. Mr. Moore stated that additional detail needs to be provided in reference to Ms. Johnston's comments. Ms. Johnston noted that as long as those requested details are provided, she can then make a judgement at that point. Mr. Moore added that truck odors and emissions can be a significant issue in the Township. He questioned why there is a need for a Nuisance Control Mitigation Plan when it was just stated that the trucks will not be emanating any odors.

**ACTION: Motion was made by Robert Simpson and seconded by Robin Dingle to table the Grand Central Sanitary Landfill, Inc. Slate Belt Heat Recovery Center Proposed Land Development Plan for the next available meeting date. *Prior to the***



*vote, Chairman, Paul Levits, asked if there were any comments from the governing body or the public. Motion approved. Vote 4-0.*

**ADJOURNMENT:**

Having no further business to come before the Planning Commission, motion was made by Robert Simpson and seconded by Terry Kleintop to adjourn the meeting. Motion approved. Vote 4-0.

The meeting adjourned at 9:59 P.M.

Respectfully submitted,

Paige Stefanelli  
Planning Commission, Secretary  
Plainfield Township