



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Waste
LE
Delta Thermo
General Permit
Applicants

September 10, 2013

Mr. Robert Van Naarden
Delta Thermo Energy, A, LLC
One Northbrook Drive
1210 Northbrook Corporate Circle
Suite 100
Trevose, PA 19053

Re: 2nd Technical Deficiency Letter
Delta Thermo Energy, A, LLC – Allentown Facility
APS ID# 799226, AUTH ID# 955622
City of Allentown
Lehigh County

Dear Mr. Van Naarden:

The Department of Environmental Protection (DEP) has reviewed your May 31, 2013 response to the Department's April 16, 2013 technical review letter. The following deficiencies were not adequately addressed:

Technical Deficiencies

1. The process description indicated a standby service agreement was in place between Delta Thermo Energy A, LLC and Sustainable Waste Solutions, LLC. This agreement must also be in compliance with the Lehigh County Solid Waste Management Plan. Please provide documentation showing the agreement complies with the plan.
2. The process description, page 6, includes a request to include the beneficial use of bottom ash as part of the general permit. Because the process is not yet in operation, chemical data and physical characteristics of the ash cannot be determined. The Department requests that this be withdrawn until data is available to make a decision on the potential beneficial uses of the bottom ash. The applicant may request to modify the general permit when information is available to support this claim.
3. Form X – There are three additional comments for revisions to the radiation action plan:
 1. Page 3 should include a comment that tritium signs can only be detected visually.
 2. Page 12, Section 6.5 should include a comment that DOT has limits on Radium 226, 228, and other TENORM isotopes based on specific activity (pCi/g).
 3. Page 13, Section 6.6 – DTE may want to establish a limit in $\mu\text{R/hr}$ because not all K-40 is NORM; it may be considered TENORM if concentrated.
4. Bonding Worksheets – The bond calculations indicate that the maximum volume of MSW to be removed is 600 tons and sludge is 50 tons. However, Section 2, page 4 of the process description

bcc: Scott Walters
Stacy Daugherty
Bill Tomayko – NERO
Tracey McGurk – NERO
General Permit File
File

SEW:SLD:pa