Easton, Pennsylvania August 15, 2019

A regular meeting of the Northampton County Council was held on the above date with the following present: Ronald R. Heckman, President; Lori Vargo Heffner, Vice President; John Cusick; Margaret L. Ferraro; Kevin Lott; William B. McGee; Robert F. Werner; Tara M. Zrinski; Linda M. Zembo, Clerk to Council and Christopher T. Spadoni, Solicitor to Council. Absent was Matthew H. Dietz.

Pledge of Allegiance

Ms. Vargo Heffner led County Council in the pledge of allegiance.

Approval of the Minutes – August 1, 2019

Ms. Vargo Heffner made the following motion:

Be It Moved By the Northampton County Council that the minutes of the August 1, 2019 meeting shall be approved.

Ms. Zrinski seconded the motion.

The minutes were approved by voice acclamation.

Courtesy of the Floor

Mr. Joseph O’Brien, 5220 Vermont Drive, Easton, PA – stated he addressed County Council two weeks ago regarding the PennEast pipeline. He further stated the pipeline had little to no benefit to the citizens of the County, but came with significant risks to personal safety, the environment and quality of life.

Mr. O’Brien advised there was the letter of the law and spirit of the law and each had different responsibilities they put on government, particularly on its leadership. He further advised the letter of the law implied action did not have to be taken and that was usually a good thing.

Mr. O’Brien stated when looking at Act 167 and the letter of the law right on through to some of the recommendations that were created by working groups as to what was required to
support pipeline development in Pennsylvania there was not really much local governments could do and that has to be acknowledged. He further stated then there was the spirit of the law that came from the Clean Water Act, Act 167 and the 2006 storm water ordinances that were adopted by County Council.

Mr. O'Brien advised these laws were about protecting the environment, but they really should think about protecting the people. He further advised just as the letter of the law could lead to a conservative point of view where action should be taken; the spirit of the law often required action within the law or to interpret it in ways that it could be used to support a goal or sometimes to take massive action of actually amending it.

Mr. O'Brien stated this was essentially what was being presented here because the County could not stop the pipeline, but perhaps it could create a pause for consideration and evaluation of it in light of the health and welfare of its citizens.

Mr. O'Brien advised they could amend the storm water ordinances of 2006 to essentially say that no earth disturbance of greater than one acre except routine road maintenance shall be committed in any portion of a watershed where earth disturbance of greater than one acre had taken place since the 2006 storm water ordinance was enacted or until the 2006 storm water ordinance for the watershed question was superceded by a revised storm water ordinance approved by the Department of Environmental Protection.

Mr. O'Brien stated the intent and spirit of the law of Act 167 was for regular five year detailed reviews and then changes because there were development habits especially if they thought about the change that happened here because now when it rained it usually poured and clearly earth disturbances had taken place.

Mr. O'Brien advised County Council within the next two weeks could put through an ordinance to change what would be the playing rules for this pipeline. He further advised they could also adjust riparian buffer waivers that had been requested by PennEast throughout the entire course of the pipeline area.

Mr. O'Brien stated it was important to think about the individual people that were involved because in the Code of Federal Regulations Act 49 Subtitle B Part 192 there was a
regulation that stated if there was a disabled person within 1000 feet of a pipeline, the pipeline had to use Class 4 not Class 3 pipe.

Mr. O'Brien advised in his neighborhood there were two people who were in wheelchairs that would be within a 1000 feet and the ability of these two individuals to evacuate their homes in under a minute was not feasible.

Mr. O'Brien stated he wanted County Council to consider the individuals involved and not just the letter of the law, but the spirit of it and take massive action on behalf of the County.

Arky Colon, 494 Pheasant Road, Saylorsburg, PA - advised he worked for Northampton County Pretrial Services and was present to discuss a resolution that would be presented to County Council later this evening. He further advised the members of the now defunct union did not once come to the County and ask to go step per step from their union pay scale to the Career Service pay scale.

Mr. Colon stated they were on the Career Service pay scale before joining the union that was decertified as of January 22, 2019 so as of that date, they had no pay scale so he wanted to know how they were being paid and why the issue was only being addressed today.

Mr. Colon advised if not for himself and some members of the group, they would not be here today because they were told the matter would be handled in 2020, but it was August 15, 2019 and they were currently being paid on a union pay scale that did not exist. He further advised they did not negotiate with the Administration this year because they had no power to negotiate, but he approached them so at some point in time they would do what was fair.

Mr. Chris Davis, 3562 Dartmouth Drive, Bethlehem, PA - stated he worked for Adult Probation and next Tuesday he would complete 29 years of employment with the County. He further stated he was disappointed by the lack of effort on the County's part.

Mr. Davis advised they received the information this week about their new pay scale, which was just their old pay scale with an additional 2% increase. He further advised there was no room for growth or steps provided for someone in his situation
so in essence he would be receiving 64 cents per hour more than he was currently making.

Mr. Davis stated when he was working at McDonald’s flipping hamburgers as a junior in high school after two years he received a higher pay increase than what the County was giving him now after 29 years of service and four years at Lehigh University. He further stated he was disappointed by what he had seen and he hoped County Council would take their request under consideration.

Mr. Tom Carlo, 306 South Robinson Avenue, Pen Argyl, PA - read a statement by Mr. Russell Zerbo of the Clean Air Council that was presented at the Pennsylvania Department of Environmental Protection meeting regarding the Air Quality Permit and Storm Water Runoff Permits for the proposed Synagro Sludge Drying Plant (see Attachment #1).

Mr. Carlo advised this facility was going to bring in 400 tons of additional sewer sludge a day to the dump, noting they already were bringing in 10-15 trucks of sewer sludge to mix with the garbage. He further advised their plan was to pelletize it and sell it for fertilizer.

Mr. Carlo stated they did not know where they were going to get rid of it, but they think they were going to use it for heat in cement plants. He further stated they wanted to fill in another 100 feet of a quarry pond that was used to fill local wells, but they did not know its depth.

Mr. Carlo advised the storm water runoff was going into that, as well as the Waltz Creek and the Bushkill Creek, both of which were of high quality.

County Executive Report

Mr. McClure stated in preparation to begin negotiations with the Managed Care Organizations coming to Gracedale they had an analysis performed with respect to their bargaining situation. He further stated during this process they discovered Gracedale had 44% of the Medicaid beds in the County so it was absolutely necessary to keep Gracedale so they could take care of these individuals.
Mr. McClure advised a lot of time was spent especially during the Human Services Committee meetings discussing Gracedale and the state of its operation, but due to the number of Medicaid beds and the condition of some of the residents the numbers provided were never going to change. He further advised Gracedale did not turn anyone away so the conditions of the residents were going to change particularly with the closure of state hospitals.

Mr. McClure stated he received a letter from Mr. Brad Roseberry, the individual who was leading the fight against big trucks, to let the County know that since County Council sent a resolution against big trucks the big truck legislation had stalled in Congress.

Mr. McClure advised County Council allowed the County to refinance its most recent bond issue so he would like to come to a Finance Committee meeting with a proposal regarding the $60 million 2012 Bond Issue. He further advised if they were to refund these bonds, it would save the County approximately $4 million depending on market conditions.

Mr. McClure stated the reason they were coming to County Council was because it would be a taxable event even though he was not wild about taxable events when it came to a municipality.

Mr. McClure advised on September 9, 2019, at 12:00 p.m., there would be a groundbreaking ceremony at the location of the new Forensic Center, which was adjacent to the 911 Center.

Mr. McClure stated because of a lawsuit filed by the landlord of the County's West Easton Treatment Center, he stopped paying West Easton the host fee, which was up to $50,000 a year. He further stated the lease allowed the County to pay that fee and deduct it from the rent so they had agreed to pay it.

Mr. McClure advised the work to demolish the Milides Building had begun.

Mr. McClure stated the County only received 40% from the bi-Counties arrangements with the Lehigh-Northampton Transportation Authority (LANTA) and Lehigh Valley Planning Commission (LVPC). He further stated LANTA needed to be reauthorized by March 2022 so there was a potential for the County to receive a percentage of the services relative to the
population for its 50% contribution.

With regards to LVPC and the Lehigh Valley Transportation Study, Mr. McClure advised there was an opportunity for the County to use its leverage in terms of what was contributed to LVPC on an annual basis. He further advised the County was receiving from now until 2045 28% of the funds from the most recent Transportation Improvement Program (TIP).

In answer to Mr. McGee’s question as to how the County arrived at this situation, Mr. McClure stated when LVPC was established it was a bi-County planning commission and inherent in that the County represented not only itself as an entity, but all the municipalities and somewhere along the way that got lost. He further stated it seemed his two predecessors put their emphasis on particular infrastructure projects, which was County bridges.

Mr. McClure advised former County Executive John Stoffa’s plan was to borrow money, but that did not work well because the bridge building process was so slow and expensive. He further advised since his entire focus was on the County’s assets there was not a larger engagement with LVPC with respect to municipal needs.

Mr. McClure stated former County Executive John Brown also identified the County bridges as a problem and went down the P3 route. He further stated again it was a focus on just County bridges and when this particular TIP was voted on he actually voted the County’s three votes in favor of this TIP that had the County at the 28% level.

Mr. McGee commented having the P3 program left a lot of money on the table that the County could have received.

Mr. McClure advised to be fair it was incredibly hard to get a bridge on the TIP because it was expensive and took so long to be completed.

In response to Ms. Ferraro’s question as to whether there was any information regarding the situation with the Grist Mill shop in Tatamy, Mr. McClure stated Mr. Charles Dertinger, Director of Administration, was working on getting signage to indicate they were open.
Consideration of a Personnel Request Resolution: Department of Human Services - Children, Youth and Families

Mr. McGee introduced the following resolution:

R. 89-2019 IT IS HEREBY RESOLVED by the Northampton County Council that the one (1) full time position of Caseworker 2, pay grade PS-35, salary $40,255, shall be eliminated and one (1) full time position of Casework 3, pay grade PS-37A-1A, salary $44,341, shall be created in the Department of Human Services - Children, Youth & Families Division, effective August 15, 2019.

IT IS HEREBY FURTHER RESOLVED by the Northampton County Council that one (1) full time position of Casework Manager 2, pay grade HS-42B-1A, salary $56,386, shall be created in the Department of Human Services - Children, Youth & Families Division, effective August 15, 2019.

IT IS HEREBY FURTHER RESOLVED by the Northampton County Council that two (2) full time positions of Casework Supervisor, pay grade HS-38B-1A, salary $47,284, shall be created in the Department of Human Services - Children, Youth & Families Division, effective August 15, 2019.

IT IS HEREBY FURTHER RESOLVED by the Northampton County Council that one (1) full time position of Caseworker 3, pay grade PS-37A-1A, salary $44,341, shall be created in the Department of Human Services - Children, Youth & Families Division, effective August 15, 2019.

As there were no questions or comments, Mr. Heckman called for the vote.

The vote: McGee, "yes"; Ferraro, "yes"; Heckman, "yes"; Lott, "yes"; Vargo Heffner, "yes"; Werner, "yes"; Zrinski, "yes"; and Cusick, "yes".

The resolution was adopted by a vote of 8-0.

Consideration of Corrections Officers Interest Arbitration Award Resolution
Mr. McGee introduced the following resolution:

**R. 90-2019 WHEREAS**, Northampton County Charter Section 202 (12) provides that, "the County Council shall have the power to approve any collective bargaining agreements with officers and employees".

**NOW, THEREFORE, IT IS HEREBY RESOLVED** by the Northampton County Council that the Northampton County Corrections Officers Interest Arbitration Award, between the County of Northampton and the Northampton County Corrections Officers, shall be approved this 15th day of August 2019.

As there were no further questions or comments, Mr. Heckman called for the vote.

The vote: McGee, "yes"; Heckman, "yes"; Lott, "yes"; Vargo Heffner, "yes"; Werner, "yes"; Zrinski, "yes"; Cusick, "yes" and Ferraro, "yes".

The resolution was adopted by a vote of 8-0.

Consideration of Revised Department of Human Services Pay Scales Resolution

Mr. McGee introduced the following resolution:

**R. 91-2019 WHEREAS**, the Northampton County Council adopted resolution #164-2018, which adopted pay scales for certain full time County employees, including the 2018 Department of Human Services Civil Service (Non-Union) Pay Scale and the 2018 PSSU Pay Scale; and

**WHEREAS**, on August 6, 2019, the Department of Human Resources indicated that due to changes in State maximum allowable salaries it became necessary to revise the 2019 Human Services Civil Service (Non-Union) Pay Scale and the PSSU Pay Scale.

**NOW, THEREFORE, BE IT RESOLVED** by the Northampton County Council that the Human Services (Non-Union) and PSSU pay scales shall be revised to read as indicated on the attached documents (refer to Exhibit "A").

As there were no questions or comments, Mr. Heckman called for the vote.
The vote: McGee, "yes"; Lott, "yes"; Vargc Heffner, "yes"; Werner, "yes"; Zrinski, "yca"; Cusick, "yca"; Ferraro, "yes" and Heckman, "yes".

The resolution was adopted by a vote of 8-0.

Consideration of Revised Court-Appointed Professional Employees Pay Scales Resolution

Mr. McGee introduced the following resolution:

R. 92-2019  WHEREAS, the Northampton County Council adopted resolution #164-2018, which adopted pay scales for certain full time County employees, including the Court-Appointed Professional Employees; and

NOW, THEREFORE, IT IS HEREBY RESOLVED by the Northampton County Council that the 2019 pay scale for Court-Appointed Professional Employees who are no longer represented by AFSCME Local 1040, shall be retroactive to July 28, 2019 (as referenced in Exhibit “A”) and shall be approved this 15th day of August 2019.

Mr. Cusick advised these employees were the backbone of the Court system and based on everything he heard he felt this pay should be made retroactive to the beginning of the year.

Mr. Cusick made a motion to amend the retroactive date from July 28, 2019 to January 1, 2019.

Mrs. Ferraro seconded the motion.

In answer to Ms. Zrinski’s question as to what the implications were with regard to the amendment, Mr. Cusick stated a budget amendment would have to be made.

Mrs. Ferraro advised it was a small amount of money in the grand scheme of things and she felt these employees were being punished for leaving the union and it was an affront to these loyal employees by not having the retroactive date set to the beginning of the year.

Mrs. Ferraro stated she hoped County Council members take off their union hats and put on their do what is right for the
employees' hat.

Mr. Werner advised in light of the comment made yesterday about the employees making a bad decision by leaving the union he did not feel if people made bad decisions, they should suffer financial hardship. He further advised this was a reasonable request and would not present a financial hardship for the County.

Mr. Lott stated he was trying to figure out why this group of employees did not have a game plan moving forward when they decertified from the union and he did not think he received an answer yesterday. He further stated County Council always asked the Administration where they were going to get the money to do things and now consideration was being given to double what the Administration requested.

Mr. Lott advised he respected the employees and spent his life fighting for the rights of employees, but he was confused about the thought process that went into leaving the union. He further advised everyone had the right to be in a union or not, but they also had a right as an employee to make sure their decisions were good ones.

Mr. Lott stated he felt these employees should have had a game plan that could have been presented during budget time. He further stated he was not positive, but he felt decisions were made without a lot of thought process on the timing of their decision.

Mr. Lott advised he was going to go with the suggestion of the Administration so he would be voting against the amendment.

Ms. Vargo Heffner advised she had been both a union and non-union employee and if a 2% increase was requested, it could be turned down and someone might not get a raise for years. She further advised this was the best reasonable offer the Administration made and she was concerned about going against what was originally decided.

In response to Ms. Vargo Heffner's question as to whether negotiations were held with these individuals, Ms. Elizabeth Kelly, Director of Human Resources, stated there were no negotiations because when they decertified they lost any right to engage in collective bargaining. She further stated the Order of Certification was issued January 22, 2019 so the Administration was not obligated to bargain.
Ms. Kelly advised they were eventually contacted by Mr. Colon and Mr. Kevin Eisenhart, Intensive Aftercare Probation Officer, and then she; Mr. Stephen Barron, Director of Fiscal Affairs; Ms. Kathleen Wedge, Deputy Director of Human Resources and Ms. Ruth Vega Velez, Associate Court Administrator, met with six of the employees because they wanted to hear what they had to say. She further advised they did not discuss any percentage increases, but they felt they should be on the Career Service pay scale at the same grade and step that they were on their most recent union pay scale.

Ms. Kelly stated they discovered the cost of moving everyone who was in that former union would be approximately $356,000 and decided that would not be feasible. She further stated it was expensive, more than they had negotiated with any other employee union group and more than any employee received in any single year.

Ms. Kelly advised she, Mr. Barron and Ms. Wedge looked at what it would cost to move them to the closest possible step, but determined it would result in uneven pay increases and would cost $50,000. She further advised they also looked at moving them to the closest step plus or minus so again there would be losers and winners and would cost $20,000.

In answer to Ms. Vargo Heffner’s question as to whether the group involved requested the pay increase be retroactive, Ms. Kelly stated she did not know if they used the word retroactive, but they made it known they wanted this increase to pick up where their collective bargaining agreement left off and they wanted to be moved to the Career Service pay scale the day after the contract expired.

Ms. Kelly advised they never talked about a 2% increase with the group, but they decided to do that when they realized the pay adjustment in moving them to Career Service was not going to be easy, smooth or cost free.

Ms. Vargo Heffner stated the County had a lot of unions that bargained in good faith who gained and lost. She further stated she did not know the history as to why these employees were no longer in the union, but that was a choice that was made and sometimes people had to live with their choices.

After Ms. Zrinski commented that she wanted to hear what
Mr. Colon had to say about the situation, Mr. Heckman advised since this was a unique situation with the employees he would allow it.

Mr. Colon advised they understood they lost the ability to negotiate when they decertified, but he approached the County Administration around September of 2018 to inform them that there was the possibility that in 2019 they would not be members of the union. He further advised he did not understand how it became the employees' burden once they were decertified to have a plan because they were the County’s responsibility as of January 22, 2019. He noted they originally came from the Career Service pay scale and they were qualified to be on it.

In response to Mr. Heckman’s question as to whether they were objecting to the pay scale, Mr. Colon stated his objection was their pay scale no longer existed and 2% was added without any background to do it.

In answer to Ms. Zrinski's question as to whether they expected to end their unionization and then go directly back on the Career Service pay scale, Mr. Colon advised they approached the Administration and asked for a fair resolution, noting they did not ask to go step for step on the pay scale.

Mr. Lott stated any time County Council approved non-union employee pay scales it approved what the Administration provided so he wanted to know if it was standard procedure to go against what the Administration provided.

Mr. Colon advised they were currently non-union employees being paid as union employees from a pay scale that no longer existed.

Mr. Cusick stated at budget time the Administration makes a proposal regarding pay scales and County Council had the option to either accept them or not.

Ms. Zrinski advised she asked yesterday if this was a reasonable request because the amount was $69,992, which was not a whole lot of money. She further advised the 2% that went across the board was the raise that everyone received and they were looking for a 4½% raise.

Mr. Colon stated they never said that, but they were looking to be placed on the Career Service pay scale closest to where they were on the union pay scale.
In response to Mr. Heckman’s question as to why Mr. Cusick’s amended date was January 1, 2019 and not January 22, 2019 when the union was decertified, Mr. Cusick advised it was because January 1, 2019 was the date when all the other employees received their raise and when their contract expired.

Mrs. Ferraro stated it was not fair to have these employees in limbo and treated differently than the other Career Service employees.

Mr. Heckman advised that as of January 22, 2019, these employees became wards of the County, but they had a pay scale so he was not going to address that issue. He further advised he did not get a reason as to the July 28, 2019 date other than that was the date that was chosen.

Mr. McGee stated this issue was discussed a lot yesterday, but the Administration presented a fair deal so he was going to agree to the date of July 28, 2019.

As there were no further questions or comments, Mr. Heckman called for a vote on the motion.


The motion failed by a vote of 4-4.

As there were no questions or comments regarding the resolution, Mr. Heckman called for the vote.


The resolution was adopted by a vote of 5-3.

LVPC Liaison Report

Mr. McGee advised LVPC was going to appear before County Council on September 5, 2019 to review their regional plan. He further advised there were some big cuts in transportation for the Lehigh Valley and they would discuss that at a later date.
Mr. Werner stated for years questions were asked as to what their plans were with regard to traffic created by the warehouses. He further stated he did not think another committee was going to make it better because it required help at a higher level so he would recommend going to the State or Federal level.

Adjournment

Ms. Vargo Heffner made a motion to adjourn the meeting.

Mr. Cusick seconded the motion.

The motion to adjourn passed unanimously by acclamation.

______________________________________________
Linda M. Zembo
Clerk to Council
Russell Zerbo, Clean Air Council  
215-567-4004 x130 rzerbo@cleanair.org

Synagro does not acknowledge in its application that Northampton County does not meet federal air pollution standards for ground-level-ozone and particulate matter. In counties that do not attain federal pollution standards, the limits on air pollution from proposed facilities are much lower.

There are many problems with Synagro's air pollution application. Within 3 miles of Grand Central Sanitary Landfill, 25% of the population lives below the poverty line, qualifying the region as an environmental justice area under the state’s guidelines. Given the proposed concentration of sewage and municipal waste activity in this already burdened community, DEP must consider the cumulative impacts of this coordinated proposal between Waste Management, Synagro and the Green Knight Energy Center.

In the proposed air permit posted on DEP's own website Synagro is proposing over 15 tons per year (TPY) of PM10 (16.86 TPY) and over 25 TPY of general PM (37 TPY), both of which should trigger Prevention of Significant Deterioration thresholds in a county that does not attain PM standards, like Northampton.

Synagro's proposed 11.3 TPY of PM2.5 above the New Source Review (NSR) threshold of 10 TPY. Synagro should be required to adhere to New Source Review requirements for PM 2.5. Synagro goes as far to include this statement in its application: “Particulate Matter associated with paved and unpaved road emissions were also included since roadway dust emissions are often a concern for landfill sites.”

Some of the most significant particulate matter emissions in this proposal are caused by emissions from roads within the footprint of the facility. These are particularly significant given the nature of materials at the site, sewage and municipal waste. Just as Slate Belt Heat Recovery may accept stormwater from the two adjacent facilities, dust from the two adjacent facilities may migrate. Synagro even relies on on dust pollution controls from the Grand Central Sanitary Landfill.

Synagro claims Grand Central Sanitary Landfill's compliance history is irrelevant to its NPDES application, but later acknowledges that “the facilities stormwater is subject to potential loading from co-located facilities (GKEDC and GCSL).” SBHRC's stormwater compliance directly hinges on the compliance of co-located facilities, thus the compliance history of those facilities is relevant to Synagro's NPDES application.
Grand Central Sanitary Landfill's storage tanks also have a significant, recent violation history
https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=488673

Synagro operates a sewage pelletizer in Camden, NJ that has recent Clean Water Act violations
https://echo.epa.gov/detailed-facility-report?fid=110006705743

Synagro states in its application that, "GCSL’s water trucks will be available to spray down the
areas surrounding the SBHRC, minimizing the potential for dust emissions."

Both the control of dust pollution and the comingling of stormwater further illustrate the need to
assess the cumulative impacts of these coordinated facilities waste facilities.
In the aggregation questionnaire Synagro answers “No” to the question “Will materials be
routinely transferred between facilities?”. This is clearly untrue based upon the coordinated
transfer of waste heat and landfill gas.

In Synagro’s waste application on page PDF page 24 it clearly states that biosolids drivers will
leave SBHRC to be weighed at GCSL and then return to SBHRC to be loaded with wastewater.

Page 62 here says they will have ten employees/visitors on any given day

http://files.dep.state.pa.us/RegionalResources/NERO/NEROPortalFiles/CommunityInformation
/SlateBelt/SBHR-Application%20Part%201.pdf

PDF page 10 here says 16 employees
http://files.dep.state.pa.us/RegionalResources/NERO/NEROPortalFiles/CommunityInformation
/SlateBelt/SBHR-Application%20Part%204.pdf

On page 32 of Synagro’s waste permit they are proposing 84 truck trips per day with none
allotted to employees and visitors. On page 62 of Synagro’s Part 1 air application they propose
50 truck trips per day not including 20 for visitors and employees.

Again on page 49 of Air Application part 4 Synagro proposes 50 truck trips plus 20 automobile
trips for 10 employees/visitors and zero truck trips for their wastewater.

**Stormwater Stuff**

Synagro also proposes to discharge stormwater to the Little Bushkill Creek which is recognized
as a High Quality Water by the DEP. Synagro failed to provide a nondischarge analysis, they also
do not provide an alternate option for discharging into the Little Bushkill Creek. In order to
maintain the High Quality designation of the Little Bushkill Creek, the DEP must require Synagro
to abide by the Clean Streams Law and evaluate nondischarge alternatives.

Synagro claims Grand Central Sanitary Landfill’s compliance history is irrelevant to its NPDES
application, but later acknowledges that “the facilities stormwater is subject to potential loading from co-located facilities (GKEDC and GCSP).” SBHRC’s stormwater compliance directly hinges on the compliance of co-located facilities, thus the compliance history of those facilities is relevant to Synagro’s NPDES application.

Grand Central Sanitary Landfill’s storage tanks also have a significant, recent violation history https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=488673

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