



People & Technology Creating a Safer, Cleaner Environment

Environmental Justice Impact Statement Public Hearing

Linden Free Public Library

April 15, 2024 6p.m.

**Safety-Kleen Systems, Inc.
1200 Sylvan Street, Linden, NJ**

**New Enclosed Waste Treatment Process &
Container Storage Areas**

safety-kleen®
PROTECTION · CHOICES · PEOPLE
MAKE GREEN WORK®

Meeting Format



Purpose

- Environmental Justice Impact Statement Public Hearing

Safety-Kleen Systems, Inc. 1200 Sylvan Street, Linden, NJ - New Enclosed Waste Treatment Process & Container Storage Areas

Accessibility

- In addition to the public forum taking place this evening at the Linden Public Library there is a Virtual Link that has been provided for attendees to participate online.
- All materials related to this Environmental Justice Impact Statement Public Hearing have been translated into Spanish – including the onsite live translation via a licensed interpreter.
- A recording and transcript of this public hearing will be made available in English & Spanish.

Ground Rules

- Be Respective
- Please silence Cell Phones

How to submit questions

- Please save questions until presentation concludes
- Verbally / Raise Hand
- Email: SafetyKleenLindenEJIS@CleanHarbors.com

Meeting Length - 2 Hours

To review the entire EJIS go to:

<https://dep.nj.gov/ej/meetings/#njdep-ej-publicmeeting>

Or

<https://www.safety-kleen.com/support/technical/regulatory-information>

Meeting Agenda



- **Facility Aerial Views**

Safety-Kleen Systems, Inc. 1200 Sylvan Street, Linden, NJ

- **Environmental Justice Impact Statement (EJIS) Defined**

- **Project Background**

- **Assessment of Project Impacts on Environmental and Public Health Stressors**

- **Conclusion**

- **Questions?**

The Safety-Kleen Linden Facility West to East View



The Safety-Kleen Linden Facility East to West View



Environmental Justice Impact Statement



Environmental justice impact statement or “EJIS” means a systematic, interdisciplinary and integrated assessment of environmental and public health conditions in an overburdened community that identifies and analyzes:

- (1) existing environmental and public health stressors;
- (2) any adverse environmental and public health stressors;
- (3) the presence or absence of adverse cumulative stressors;
- (4) potential environmental and public health stressors associated with a facility;
- (5) whether the facility can avoid causing a disproportionate impact;
- (6) the measures the facility will propose to implement to avoid or address any disproportionate impact; and
- (7) where applicable, how the new facility serves a compelling public interest in the overburdened community.

Environmental Justice Impact Statement



Due to a proposed facility expansion the following actions have been taken that require an EJIS:

- A combined RCRA/Solid Waste Permit modification & new Air Permit requests have been submitted to the NJ Department of Environmental Protection (NJDEP) for the treatment of a maximum 200 tons/day of hazardous waste for stabilization & solidification & receive 99 tons per day non-hazardous waste & of that solidify 84 tons per day in two (2) fully enclosed mix pits.
- 3 existing truck stations & the newly constructed Mix Pit Building are proposed to be RCRA/Solid Waste permitted to store approved hazardous & non-hazardous wastes in containers.

Environmental Justice Impact Statement



Background

Clean Harbors/Safety-Kleen have been approached by existing & potential customers (e.g., local power utilities, transit authorities, etc.) to provide a hazardous & non-hazardous waste stabilization/solidification process at the Linden facility for sludges generated from their operational & remediation activities that include utility manhole cleanouts, oil/water separator cleanouts, maintenance garage trench cleanings, spill clean-ups etc. Such materials are typically low level metal-bearing hazardous wastes requiring stabilization & solidification prior to offsite disposal.

- Associated utility company activities are essential for maintaining area electrical grids
- The Linden facility owned & operated by Safety-Kleen Systems, Inc. (Safety-Kleen) as of 1989 has been in existence since 1942 with a primary function of recycling/reusing/reclaiming non-renewable natural resources like organic-based solvents.
- Amongst other regulatory programs the facility is currently permitted by the NJ Department of Environment Protection (DEP) under the Resource Conservation & Recovery Act (RCRA) & Clean Air Act (CAA) for the storage of hazardous & non-hazardous wastes in tanks & containers as well as the recycling of organic solvents & treatment via fuel blending of hazardous wastes in tanks.
- The facility is inspected weekly by DEP & is recognized under its Environmental Stewardship Program.

Environmental Justice Impact Statement



Background (cont.)

- The subject RCRA permit modification is to allow for the treatment of metal-bearing hazardous wastes via stabilization/solidification in 2 enclosed Mix Pits as well as authorize 4 additional container storage areas (CSAs). A new CAA permit will authorize construction & operation of the mix pit operation with air pollution control devices installed.
- The Mix Pits will be located in a newly constructed purpose-built building with all proper secondary containment to contain spillage & air pollution control devices to remove dust & any low-level organic air pollutants.
- The Mix Pits will be constructed of steel-lined concrete inground structures provided with secondary containment as well as leak containment & detection.
- Treatment via stabilization/solidification (a USEPA recognized treatment process) is performed by placing compatible metal bearing hazardous wastes in the Mix Pits, decanting free liquids off the wastes, then adding binding agents (e.g., Portland cement) in the Mix Pits followed by solidification using various absorbent materials & mixing all materials using a dedicated backhoe or excavator.

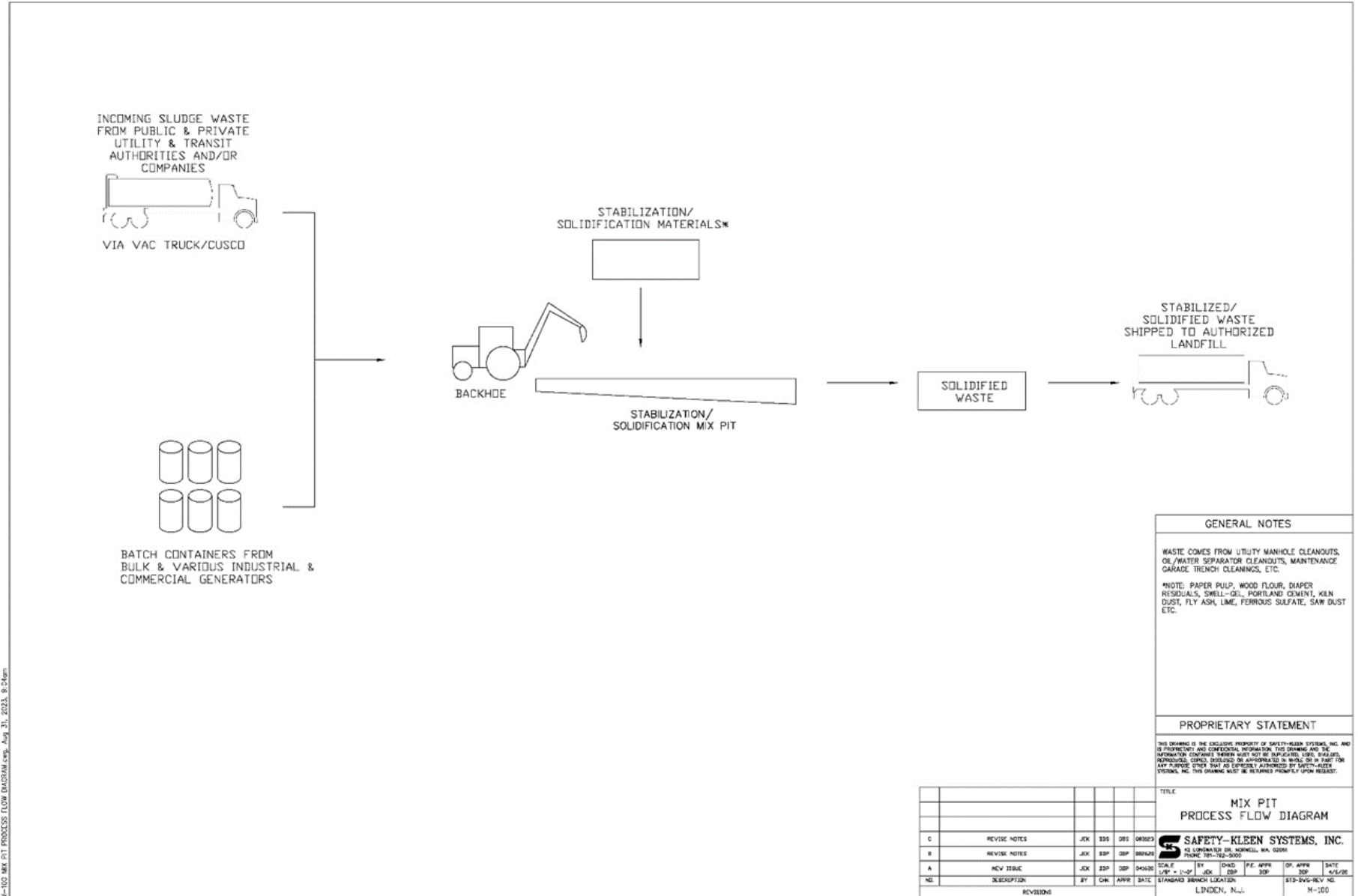
Environmental Justice Impact Statement



Background (cont.)

- The mixture will then be tested to confirm treatment is successful rendering the hazardous wastes non-hazardous prior to offsite disposal.
- Non-hazardous industrial wastes will be solidified in the mix pits by decanting free liquids off the wastes, adding various absorbent materials (e.g., kiln dust) in the Mix Pits followed by mixing all materials using a dedicated backhoe or excavator.
- The facility is currently permitted for 465,940 gallons of hazardous waste storage in containers.
- 3 existing truck stations & the new Mix Pit Building are being permitted by the subject permit modification for the proper storage of hazardous & non-hazardous wastes in containers in support of the Mix Pits & other operations.
- The newly permitted CSAs will allow for an additional 168,000 gallons & 600 cubic yards of hazardous waste storage in containers.

Hazardous Waste Treatment via Mix Pit Flow Diagram



M-100 MIX PIT PROCESS FLOW DIAGRAM.cmp, Aug 31, 2023, 8:54am

GENERAL NOTES

WASTE COMES FROM UTILITY MANHOLE CLEANOUTS, OIL/WATER SEPARATOR CLEANOUTS, MAINTENANCE GARAGE TRENCH CLEANINGS, ETC.

*NOTE: PAPER PULP, WOOD FLOUR, DIAPER RESIDUALS, SWELL-GEL, PORTLAND CEMENT, KILN DUST, FLY ASH, LIME, FERROUS SULFATE, SAW DUST ETC.

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REVISIONS		TITLE	
NO.	DESCRIPTION	BY	DATE
C	REVISE NOTES	JCK	2/28/2023
B	REVISE NOTES	JCK	2/28/2023
A	NEW ISSUE	JCK	2/28/2023

SAFETY-KLEEN SYSTEMS, INC. 2000 LINDEN BLVD., LINDEN, N.J. 07036 PHONE 908-752-5000			
SCALE: 1/4" = 1'-0"	BY: JCK	CHKD: JSP	DATE: 4/16/20
DESCRIPTION: STANDARD BRANCH LOCATION	BY: JCK	CHKD: JSP	DATE: 4/16/20
LINDEN, N.J.		N-100	

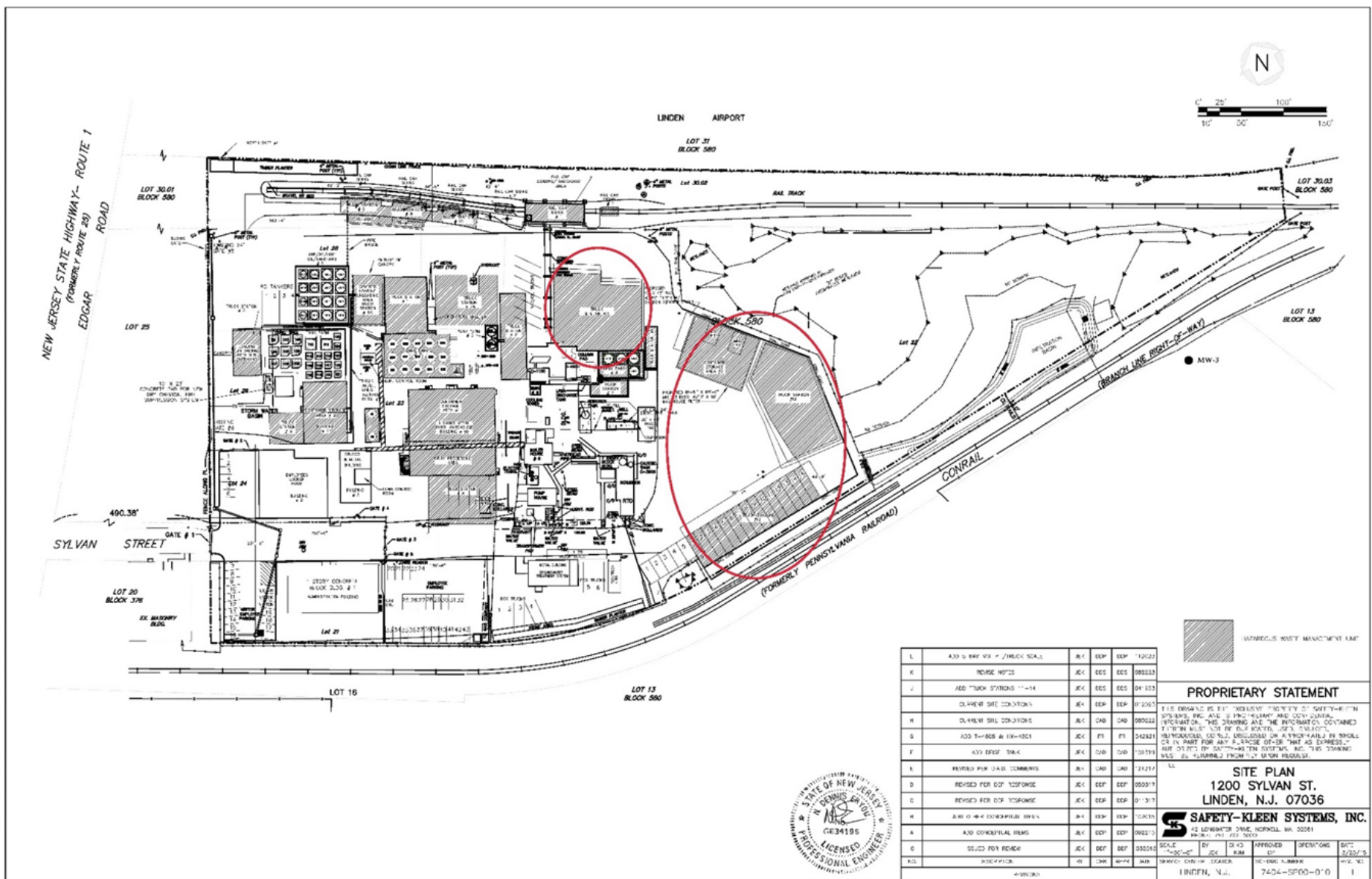
Environmental Justice Impact Statement



A site plan showing locations for the Mix Pit and the CSAs as well as preliminary designs for the Mix Pit & the Mix Pit Building are as follows:



Mix Pits & New Container Storage Area Locations



L	ADD 5' RAY W/ - / (MIX) SCALE	JFK	EEP	EEP	12/22
R	REVISE NOTES	JFK	CCS	CCS	08/22/23
V	ADD TRACK STORAGE 11-14	JFK	CCS	CCS	04/23
	CLARIFY SITE CONDITIONS	JFK	EEP	EEP	07/20/23
H	CLARIFY SHL CON-2102-5	JFK	CAO	CAO	08/02/23
D	ADD T-805 & 106-1051	JFK	PT	PT	24/23/23
F	ADD 0202 - 106-C	JFK	DBR	DBR	10/19/23
I	REVISED PER O&M COMMENTS	JFK	CAO	CAO	12/12/23
D	REVISED PER O&M RESPONSE	JFK	EEP	EEP	05/03/23
D	REVISED PER O&M RESPONSE	JFK	EEP	EEP	07/31/23
H	ADD 0-4-4 CATCHPILE 88VA	JFK	ESP	ESP	12/21/23
R	ADD CONCEPTUAL PILING	JFK	EEP	EEP	08/22/23
D	REVISED FOR PERMITS	JFK	DEF	DEF	03/20/24
REV	REVISED FOR PERMITS	JFK	DEF	DEF	03/20/24

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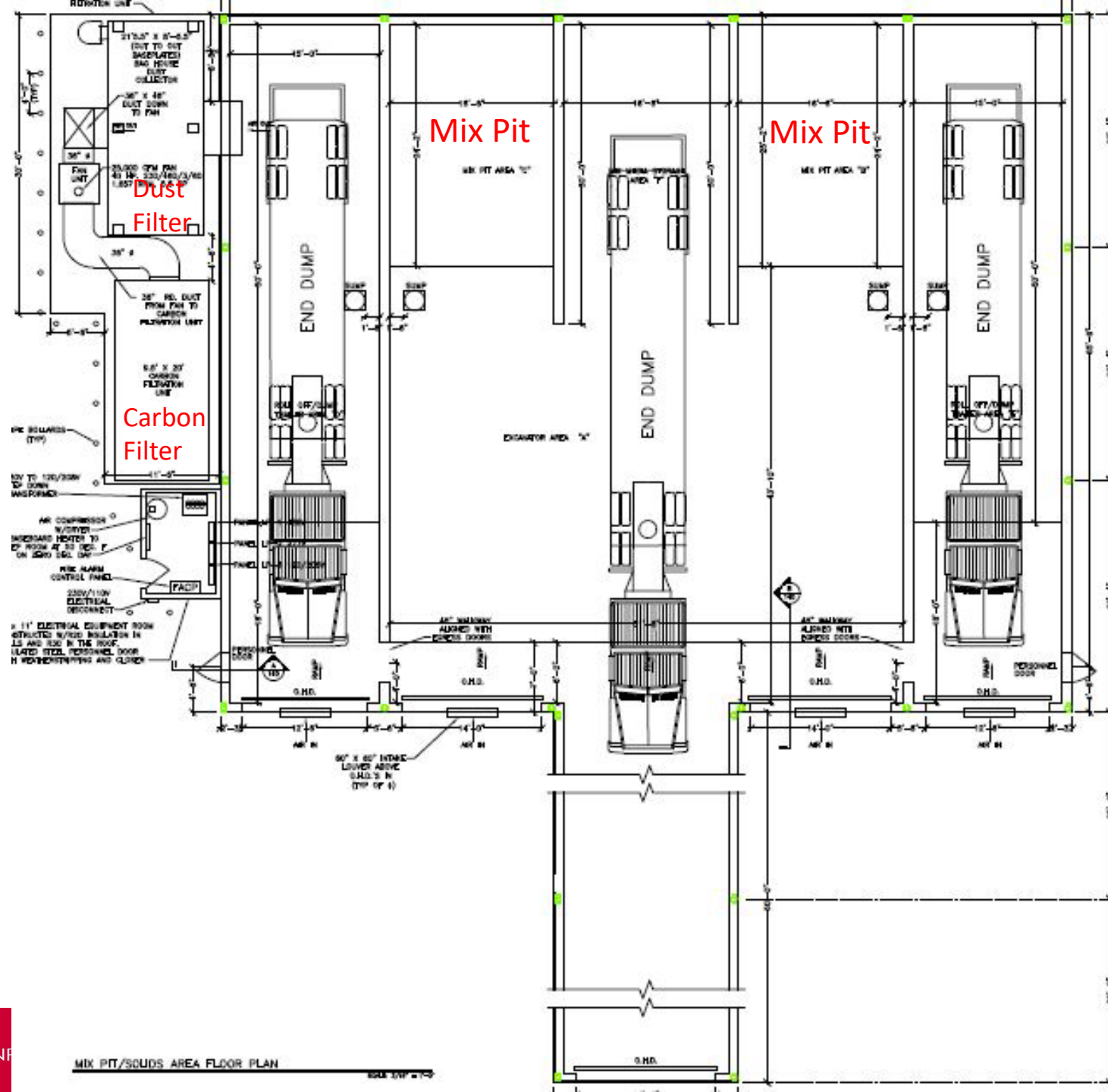
SITE PLAN
1200 SYLVAN ST.
LINDEN, N.J. 07036

SAFETY-KLEEN SYSTEMS, INC.
 42 LOWMEYER DRIVE, NORWALK, MA 02061

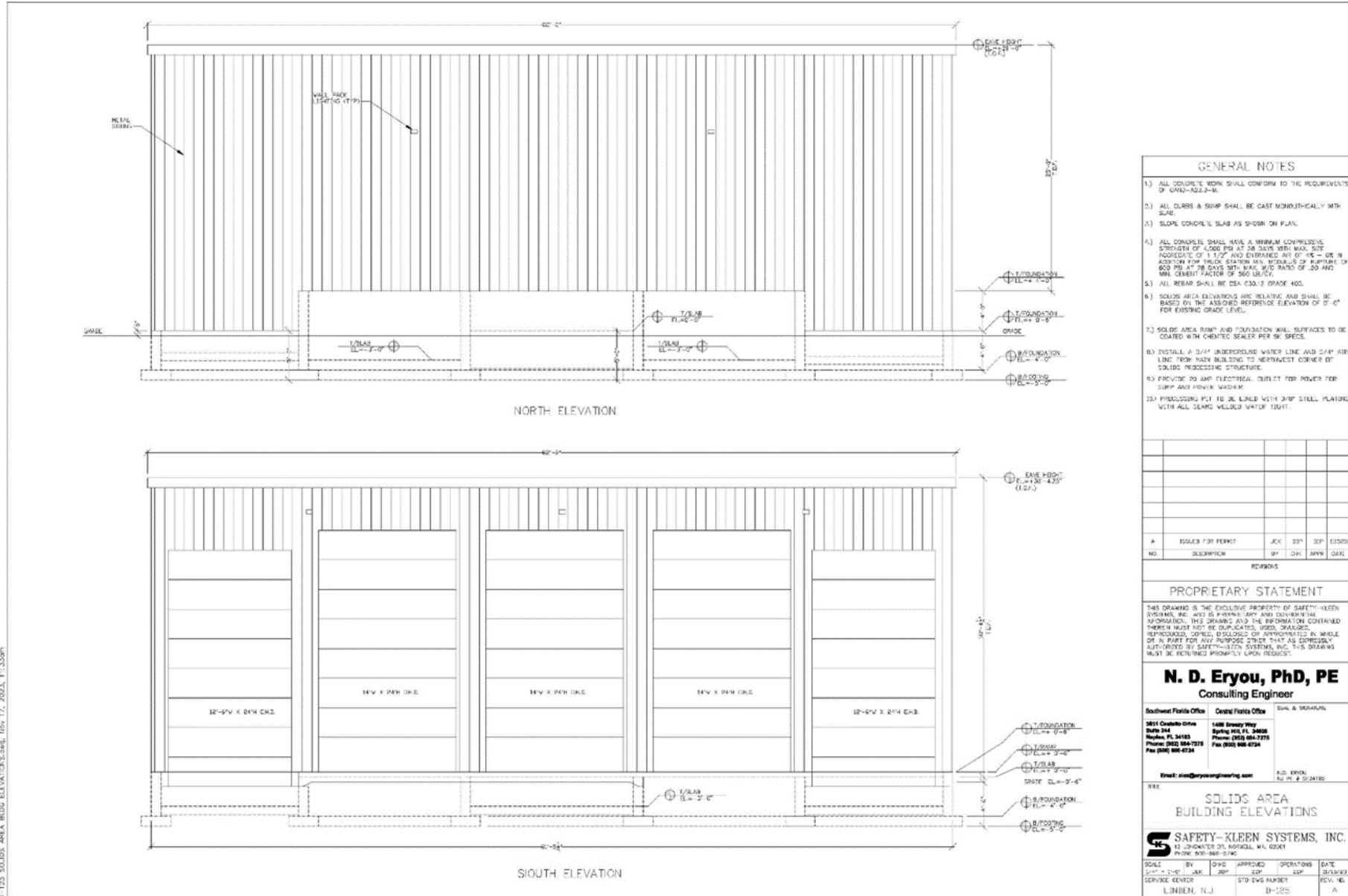
SCALE: 1" = 40'-0" (AS SHOWN)
 DATE: 12/22/23
 PROJECT: LINDEN AIRPORT
 SHEET: 1 OF 1



Mix Pit Building



Mix Pit Building



D-125 SOLIDS AREA BUILD ELEVATION (REV. 10/2023), 11:33am

Environmental Justice Impact Statement



• Permit Modification Summary

- Add a new process for the treatment of a maximum 200 tons/day of hazardous wastes via stabilization & solidification in the fully enclosed Mix Pits with air pollution control devices & receive up to 99 tons/day non-hazardous wastes of which a maximum of 84 tons/day will be solidified in the Mix Pits

- Addition of 4 new CSAs:
 - ❖ Truck Station 11 - 67,500 gallons
 - ❖ Truck Station 12 - 82,500 gallons
 - ❖ Truck Station 13 – 600 cubic yards
 - ❖ Mix Pit Building/CSA 3 – 18,000 gallons

Assessment of Project Impacts on Environmental and Public Health Stressors

➤ Ground-Level Ozone

Volatile organic compounds (VOCs) interact with nitrous oxides in the presence of sunlight to produce ground-level ozone. With emission controls in place, mix pit operations are expected to have the potential to emit 1.58 tons per year (tpy) of VOCs, which represents a 7.3% increase in facility-wide potential to emit for VOCs.

<u>Current VOC Potential to Emit</u>	<u>Future VOC Potential to Emit</u>
21.52 Tons per Year	23.1 Tons per Year

Based on the information from this screening, the facility expansion is not expected to have a significant impact on this stressor.

EJIS Summary



➤ Fine Particulate Matter (PM_{2.5})

Mix pit operations are expected to emit fine particulate matter (PM_{2.5}), which includes particles of dust and sand that are 2.5 or fewer micrometers in diameter. The facility will install a baghouse filter which controls over 99% of particulate matter emissions associated with mix pit operations.

<u>Current Fine Particulate Matter (PM_{2.5}) Potential to Emit</u>	<u>Future Fine Particulate Matter (PM_{2.5}) Potential to Emit</u>
1.37 Tons per year	1.70 Tons per year

This expansion is not expected to impact this stressor as determined by air risk screening.

EJIS Summary



➤ Cancer Risk from Diesel Particulate Matter

Particulate matter from diesel exhaust is known to contain carcinogens, including arsenic, cadmium, & chromium.

The volume of heavy-duty trucks entering & exiting the facility is expected to increase by a maximum of 15 heavy-duty trucks per day & up to 10 light-duty trucks per day, however these vehicles are already traveling through the area. The Mix Pit operation in Linden will potentially reduce the overall miles traveled as well as exhaust emissions on a daily basis.

<u>Type of Vehicle</u>	<u>Daily Current Onsite Traffic</u>	<u>Daily Future Onsite Traffic</u>
Heavy-Duty Trucks	22	37
Light-Duty Trucks	8	18
Personal Vehicles	77	123

➤ Cancer Risk from Diesel Particulate Matter (cont.)

Maximum potential PM_{2.5} diesel exhaust emissions are expected to potentially be 0.00157 tpy for heavy-duty trucks, & 0.00071 tpy for light-duty trucks. To mitigate its effect on cancer risk from diesel particulate matter, the facility will take measures to minimize the amount of diesel particulate matter emissions associated with its operations, including using ultra-low sulfur diesel in all fleet vehicles, & minimizing idling times. The proposed expansion is not expected to have a significant impact on this stressor.

➤ Cancer Risk from Air Toxics Excluding Diesel Particulate Matter

Hazardous air pollutants (HAPs) are expected to be emitted when waste material is being mixed within the mix pit, & a trace amount of hazardous air pollutants are expected to be emitted when hazardous waste is being loaded into the mix pit. The hazardous air pollutants expected to be emitted from mix pit operations include ones that have been classified as known carcinogens, such as PCBs, arsenic, nickel, benzene, cadmium, and toluene. As mentioned above, based on potential-to-emit calculation in the facility's Mix Pit Air Permit application, mix pit operations have the potential to emit up to 1.58 tpy of hazardous air pollutants with emission controls.

EJIS Summary



➤ Cancer Risk from Air Toxics Excluding Diesel Particulate Matter (cont.)

Air emissions from the loading & mixing of waste in mix pits is controlled by the baghouse filter and carbon absorption bed. The proposed expansion is not expected to have a significant impact on this stressor, as determined by the air risk screening

➤ Non-Cancer Risk from Air Toxics

- As previously mentioned, mix pit operations are expected to emit toxic air pollutants classified as being known to cause cancer or other serious health impacts. The increased hazardous air pollutant emissions associated with mix pit operations will be minimal, and a risk screening for air quality indicated that there would be no significant air quality impacts associated with this expansion.
- The facility will take measures to minimize the non-cancer risk from air toxics by utilizing emission control equipment in the form of a baghouse dust collector & a carbon absorption bed, & performing mix pit operations within an enclosed building. The proposed expansion is not expected to have a significant impact on this stressor, as determined by air risk screening.

EJIS Summary



➤ Mobile Sources of Air Pollution (Traffic – Cars, Light- and Medium-Duty Trucks)

Mix Pit operations & the hazardous waste container storage areas are estimated to cause a maximum increase in car & light-& medium-duty truck traffic of 56 vehicles onsite per day. The majority of that increase will be attributed to relocated vehicles that are already traveling in the area. The facility will continue to minimize unnecessary traffic entering & exiting the facility, & the proposed expansion is not expected to have a significant impact on this stressor.

➤ Mobile Sources of Air Pollution (cont.: Traffic – Heavy-Duty Trucks & Rail)

Operation of the mix pits and hazardous waste container storage areas is estimated to cause a maximum increase in heavy-duty truck traffic of 15 trucks per day. This facility is not expected to increase the number of rail miles as no additional railways will be constructed for the purpose of this expansion. The use of the facility's rail transportation capability for offsite shipping of wastewater & treated solid wastes generated by mix pit operations is a potential transportation alternative. The proposed expansion is not expected to have a significant impact on this stressor.

EJIS Summary (cont.)



➤ Contaminated Sites (Known Contaminated Sites)

The facility is a known contaminated site with ongoing corrective action/clean-up. The proposed facility expansion is not expected to increase this stressor, as no additional known contaminated sites will be created because of this project.

➤ Contaminated Sites (Soil & Groundwater Contamination)

There are no soil contamination deed restrictions associated with the current or planned operations at the Linden Recycle Center. The facility will continue to perform groundwater monitoring and operate a groundwater treatment system which has successfully removed over 30,000 pounds of VOCs since the year 2004. This project is not expected to impact these stressors.

➤ Transfer Stations, or Other Solid Waste Facilities, Recycling Facilities, Scrap Metal Facilities

The site currently operates as a solid waste facility possessing a hazardous waste permit, which contains provisions for handling solid/non-hazardous wastes. The expansion will occur within the facility's existing footprint & no additional solid waste, recycling or scrap metal facilities will be created because of this project. The facility is not expected to impact this stressor.

EJIS Summary (cont.)



➤ Point-Sources of Water Pollution (Surface Water & Combined Sewer Overflows)

There is no point-source discharge to surface water associated with the proposed operations & the facility expansion is not expected to increase the occurrence of combined sewer overflows. The facility is not expected to impact these stressors.

➤ May Cause Potential Public Health Impacts (Drinking Water, Potential Lead Exposure, Lack of Recreational Open Space, Lack of Tree Canopy, Impervious Surface, Flooding)

The proposed facility expansion is not expected to cause any public drinking water or private well testing violations or exceedances, will not have any impact on the number of houses built before 1950 or the amount of recreational open space within the area, no trees will be removed, the amount of impervious surface will not increase, and no increase in the percentage of urban land use area that is flooded will occur.

EJIS Summary



➤ Density/Proximity Stressors (Emergency Planning, Permitted Air & NJPDES Sites)

The facility is not currently classified as an Emergency Planning site, is already classified as a permitted air site & does not require an additional NJPDES permit due to this project. The facility expansion is not expected to impact these stressors.

➤ Social Determinants of Health (Unemployment & Education)

The proposed facility expansion will require the Linden Recycle Center to hire two to five additional full-time employees & relocate approximately 43 existing employees from another company location in NJ, & is not expected to have an impact on the percentage of individuals without high school diplomas in the area. The facility expansion is not expected to impact these stressors.

Conclusion



- Clean Harbors/Safety-Kleen have public utility & transit authority customers relaying their hazardous waste processing needs to company representatives & have been requesting a means to manage their wastes locally as they perform maintenance on electrical grids & perform other services
- Clean Harbors/Safety-Kleen has long-term experience designing & operating environmentally sound processes to store & treat hazardous wastes in accordance with applicable regulations
- All required permits, registrations & other governmental authorizations will be obtained and maintained for hazardous waste transportation, storage & processing as well as for air pollution control

Conclusion



The proposed facility expansion will not have a disproportionate impact to the City of Linden.

To review the entire EJIS go to:

<https://dep.nj.gov/ej/meetings/#njdep-ej-publicmeeting>

Or

<https://www.safety-kleen.com/support/technical/regulatory-information>



Questions?