

4/4/2023

David Pepe  
NJDEP  
Office of Permitting and Project Navigation  
401 East State Street  
Trenton, NJ 08625  
(609) 984-4515

**Re: Response to Public Comments  
Veolia ES Technical Solutions, L.L.C., Middlesex, NJ  
Hazardous & Solid Waste Facility Part B Permit Renewal  
EPA ID Number NJD002454544, Permit Number HWP190002**

Dear Mr. Pepe:

Please accept this document as Veolia's response to the public comments received through our published email address and at the March 2, 2023 Public Hearing. Please note that no questions or comments were received via the posted email address, just one RSVP.

Should you have any questions or require additional information please contact me at (973) 691-3966 or email me at [paul.degiulio@veolia.com](mailto:paul.degiulio@veolia.com)

Sincerely,



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Encl. Meeting recording: Veolia EJ Meeting 3.2.2023.mp4



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## Veolia Environmental Justice Presentation & Public Hearing Questions / Comments

Q1: How often does Veolia have to do this presentation? - David Bird

A1: The Environmental Justice process will need to be repeated anytime we might request a permit modification or a new permit. The RCRA Part B Permit, once renewed, will be issued for ten years.

Q2: How does Veolia monitor the air quality? -David Bird

A2: In keeping with the applicable emissions regulations Veolia utilizes a third party company to conduct air monitoring for organic vapors on a schedule determined by the regulations. Prescribed monitoring points, such as valves, and pumps are monitored on a monthly basis and a larger list on a quarterly basis. Anything that is identified as needing follow up is reported immediately and repaired. We also report on our emissions to the NJDEP annually through two reports required under the regulations.

Q3: How does Veolia monitor/evaluate the storm water/flood water onsite before releasing it? – David Bird

A3: The active portion of the plant where processing occurs is all considered secondary and tertiary containment systems; i.e. the facility is fully covered in concrete, joints are sealed, and curbing surrounds the active portion of the plant. The tank farms are in walled areas. Storm water that falls into the active portion of the plant is contained by these systems and pumped through an air stripper to remove any volatile organics prior to discharge to the Middlesex County Municipal Utilities Authority (MUA) treatment works via sanitary sewer, under an industrial discharge permit. Sampling is conducted on the storm water in conjunction with the permit conditions. Reports are sent to the MUA monthly.

Q4: Is a release covered under Veolia air permits? -David Bird

A4: Under NJDEP regulations, a release would be covered under the Discharge Prevention, Containment, and Countermeasures/Discharge Cleanup Response Plan (DPCC/DCR Plan). Releases are required to be reported to the main emergency hotline at DEP (The Department) within 15 minutes or as soon as practicable safety-wise. The Department then makes internal communications within DEP and potentially to EPA depending on the circumstances. Written follow up is later provided by Veolia as proscribed in the regulations.

Q5: Does Veolia send water right to the sewer? -David Bird

A5: Only the domestic sewerage goes directly to the sewer. (i.e. bathrooms, sinks, showers).

Q6: How do you interface with local officials? -Homer Mosley

A6: Veolia is actively engaged with the Middlesex Community Advisory Panel (CAP), with many representatives of the CAP here tonight. We invite the local Fire Departments and Local Emergency Planning Coordinators to the facility to conduct drills, and enjoy very open, two-way communications with local, county, and state regulatory officials.

Q7: What is Veolia's approach given a scenario for an accident or spill? How does it reach the public? Does Veolia have an emergency action plan? - Barbra Benson, Middlesex OEM Lt.

A7: All plant Operations personnel are trained to the OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) standard. Therefore we would respond to our own spills or discharges. Should additional help be needed, we have additional trained staff and equipment at our other Middlesex location and in Flanders, NJ.

Veolia has several plans/permits in place related to emergency response, as governed under different regulations, permits, and company policy: a Facility Contingency Plan, an Emergency Action Plan, the



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aforementioned DPCC/DCR Plan, a Fire Prevention Plan, and a Crisis Communication Response Program.

These plans are reviewed and updated at least annually. Updated copies of the Contingency Plan are sent to the local hospital, Fire Marshall, LEPC, and Police Department.

As stated above, Veolia would report a discharge or emergency directly to the NJDEP. The fire alarm system automatically alerts the Middlesex Fire Department. Communicating with the Public would be up to the Incident Commander.

Q8: What does the general public comment period entail? How does the general public know about the comment period? - Barbra Benson, Middlesex OEM Lt.

A9: The public comment rules are set in the Administrative Order. Veolia published the notices in two major area newspapers in English and Spanish, and on a dedicated web page. The Project Summary and the Draft permit renewal were both posted there, as well. Veolia also set up and monitored a dedicated email inbox for comments submitted electronically (none were received). The NJDEP also posted our request for public comments/notice of public meeting, the project summary, and the draft renewal documents on their Environmental Justice website. The comment period is now closed; a recording of the meeting and the written responses to all questions received have been sent to the NJDEP.

Comments: General positive specific feedback on Veolia's transparency. - Wayne Foster