



# Alaimo Group

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March 28, 2025

Ms. Julie Acton, Executive Director  
Salem County Improvement Authority  
286 Welchville Road, PO Box 890  
Alloway, NJ 08001-0890

Re: Salem County  
Solid Waste Advisory Council  
Application to Amend the Salem County  
District Solid Waste Management Plan  
Giordano's Vineland Scrap Material, LLC  
107 Tilbury Road  
Block 47, **Lots 2, 3 and 4**  
City of Salem  
**Engineer's Report #2**  
Our File: A1110-0033-000

Dear Ms. Acton,

Our office has reviewed **revised** documents submitted for the above-referenced application. Our office has been requested to review the application on behalf of the Salem County Solid Waste Advisory Council (SWAC). **New or revised information is shown in bold.** The following documents have been submitted:

- Application to Amend the Salem County District Solid Waste Management Plan, 15 Pages, dated 10/23/24.
- Conceptual Preliminary Site Plans, prepared by MidAtlantic Engineering Partners, dated 9/24/24, **revised 3/13/25** consisting of **eleven (11)** sheets.
- Impact Statement for Block 47, **Lots 2, 3 & 4**, City of Salem, Salem County, NJ, prepared by MidAtlantic Engineering Partners, dated **3/17/25**.
- **Public Notices.**
- **Response letter from MidAtlantic Engineering Partners. LLC dated 3/19/25.**
- **Letter from New Jersey American Water, dated 2/24/25.**
- **Draft letter from SMS Lines, dated 2/17/24.**

- Consulting Engineers -

Civil • Structural • Mechanical • Electrical • Environmental • Planners

- **Traffic Engineering Assessment, prepared by Shropshire Associates, LLC, dated March 26, 2025.**
- **Building Renderings - Proposed 200' x 500 'x 40' Pre-Engineered Metal Building System for Giordano's Recycling, prepared by Fabbri Builders, Inc.**

### **Project Description**

The proposed project is a Transfer Station/Materials Recovery Facility (TS/MRF), Single Stream, Class A (with metal buy-back center), Class B Recycling Center and Class C decasing area. Based on the conceptual preliminary site plans ("the plans") and impact statement, the properties included in the application are Block 47, **Lots 2, 3, and 4**, located along Tilbury Road, CR #661 in the City of Salem. The properties consist of **47.75** acres based on the tax map.

**The plans show a 50,000 SF building (Phase 1) containing a 30,000 SF construction / demolition (C/D) area, and a 20,000 SF metal buy back area. The plans show a 100,000 SF building (Phase 2) containing the addition of a 50,000 SF trash area.**

**The construction / demolition (C/D) area contains an unprocessed material dumping area, a mobile grinder, proposed sorting lines and a bypass line for clean material, 2000 SF baler and unauthorized material container. The metal buy-back area contains public indoor scales, four (4) copper / brass / high temp. alloys bunkers, 2000 SF baler and unauthorized material container. The trash area contains a dumping area for unprocessed material, sorting lines, a bypass line for clean material, a 5,000-15,000 SF processing area and Class C decasing area with a 20' high push wall, 2000 SF baler and unauthorized material container.**

**Seven (7) 40-foot wide openings are to be located along the north side of the building. The north side contains employee and public parking, public drop off area and twenty-eight (28) 12' x 60' truck spaces.**

**Nine (9) 30-foot wide overhead doors are to be located along the south side of the building. The south side contains a stabilized base paved staging and storage area for proposed exterior stockpiles for brick and block, soil, clean stone aggregate, wood, aluminum, six (6) 20' x 50' bunkers for clean sorted metal, an equipment storage area, covered trailer storage area, six (6) 12' x 60' truck parking spaces and a 25,000 SF temporary structure for finished goods.**

Access to the proposed facility is to be provided from Tilbury Road, CR #661 via a one-way curbed entrance drive which leads to a **guard shack**, two (2) inbound scales and scale house and then to the staging and storage area. Site exit is via a one-way curbed exit drive leading to two (2) outbound scales and scale house, **payment building**, then to Tilbury Road, CR #661. **Masonry walls are to be located across the frontage of the property with security fencing at the entrance and exit.**

The plans also show an area for future expansion, retaining wall, stormwater collection system, stormwater basins, and stormwater outfalls. The plans show that freshwater wetlands and a tributary to Salem River exist on the site.

### **General**

1. Review is based on “Guidelines for Evaluation of Solid Waste Facility Requests to be Included in the Salem County Solid Waste Management Plan” (“the Guidelines for Evaluation”) and the contents of the application to assist the SWAC in review of the application. **Applicant response: Acknowledged.**
2. The applicant should provide proof of publication in accordance with Section 1.2 of the Guidelines for Evaluation. **Applicant response: Proof of public notice publications are included within the application package and are included with this resubmission.**

### **Evaluation Criteria**

3. Evaluation Criteria are provided in Section 2.0 of the Guidelines for Evaluation and include the following:

*The SWAC's evaluation of the proposed facility and recommendation to the Commissioners will be based on the application's consistency with the following criteria:*

1. *The proposed facility will provide for the proper management of solid waste and can be shown to be a complementary component of the coordinated strategy for solid waste management.*
2. *The proposed Facility will not have a negative effect on existing public efforts and legal responsibilities of Salem County to manage solid waste.*
3. *The facility shall not have a negative effect on public or environmental health, safety or welfare.*
4. *The applicant has demonstrated the necessary competency, knowledge, resources and experience to operate the proposed facility in accordance with all laws, regulations and the Solid Waste Management Plan.*
5. *The proposed facility has proposed a proven technology (or innovative technology shown to be feasible) and appropriate for managing the solid waste proposed to be accepted at the facility.*

**Applicant response: Acknowledged.**

### **Properties and Ownership**

4. Section 3.1.2 of the Guidelines for Evaluation states: “A copy of the deed of record establishing ownership of the facility property or, if the applicant is other than the landowner, a legal agreement (for example, a legal lease agreement) to use the real property in question for the intended purpose shall be provided.” **Applicant response: A copy of the deed of record with options agreement is included within the application package.**
5. The application (Page 2) states that Block 47, Lots 2, 3 and 4 are owned by the City of Salem, and refers to Resolution No. 2024-275 of the City of Salem in support of the project; and Resolution No. 2024-274 authorizing the execution of a land option purchase agreement with Giordano’s for purchase of the site for purposes of the redevelopment of the former Salem City Landfill. The applicant should confirm that copies of the resolutions were submitted with the application. **Applicant response: Copies of the resolutions approved by Salem City Council are included within the application package.**
6. The application (Page 2) states that Block 47 Lot 5 is currently owned by Salem County. The applicant should confirm whether there is a legal agreement with Salem County to use real property in question for the intended purpose. **The plans and impact statement have been revised to exclude Lot 5.**
7. The plans and impact statement are based on the project including Block 47 Lots 2, 4 and 5, a total of 41.58 acres (Lot 2 contains 10.17 acres; Lot 4 contains 30.00 acres and Lot 5 contains 1.41 acres). The application (Page 1) states that the project includes Block 47 Lots 2, 3, 4 and 5. If Lot 3 (7.58 acres) is included, the project would contain 49.16 acres. The lots and acreage proposed to be included in the project should be clarified, and the application, plans and impact statement should be modified accordingly. **The plans and impact statement have been revised to include Lot 3 and exclude Lot 5. The properties included are Block 47, Lots 2, 3 and 4, a total of 45.75 acres.**

### **Geographical Location**

8. Section 3.2.2 of the Guidelines for Evaluation requires a USGS Quadrangle map, which shall delineate any public access roads to the site and any streams, ponds, wetlands, floodplain and sensitive receptors (for example, hospitals, schools, playgrounds, churches, homes, etc.) within a one-half mile radius of the site. It is recommended that that the USGS map in Appendix A of the impact statement show a boundary of ½ mile from the site, and any of the above sensitive receptors. **The USGS Quadrangle Map provided in Appendix A of the Impact Statement has been revised to delineate the sensitive receptors listed above within a one-half mile radius of the site.**

9. It is recommended that the Zoning Map on the Cover Sheet of the plans include the zoning districts within Elsinboro Township in addition to the zoning districts within Salem City. **The zoning map has been revised to include the zoning districts within Elsinboro Township.**

### **Process Design and Operation**

10. The application (Page 3) states that the proposed Transfer Station/Materials Recovery Facility (TS/MRF) will be a one (1) story metal building with an area of 30,000 to 60,000 SF to begin operations and subject to expansion upon receipt of appropriate approvals thereafter. The plans and impact statement show the building size to be 100,000 SF plus a 25,000 temporary structure for finished goods, plus an area for future expansion. The proposed building size and proposed phasing should be clarified, and the application, plans and impact statement should be modified to be consistent. **The plans have been revised to clarify the proposed building size and phasing. Phase 1 building size is 50,000 square feet and Phase 2 building size is 100,000 square feet plus a 25,000 square foot temporary structure for finished goods. It is recommended that the applicant provide testimony describing the proposed site circulation, operations and storage areas for each phase.**
11. The application (Page 3) states that the height of the building will be approximately 40 feet. **Applicant response: Acknowledged.**
12. The plans show the building to include nine (9) 30' wide x 30' high overhead doors on the south side of the building. **The building has been revised to include seven (7) 40' wide x 40' high openings on the north side. It is recommended that the applicant describe the use of these openings and confirm whether they will have overhead doors.**
13. Site Layout Plan Note 15 states: See architect's plans for building elevations and floor plans. Architectural plans and elevations should be submitted for review if available. **Building Renderings - Proposed 200' x 500 'x 40' Pre-Engineered Metal Building System for Giordano's Recycling, prepared by Fabbri Builders, Inc. have been submitted for review. It is recommended that the applicant provide testimony describing the proposed building size, height, doors and appearance for each phase.**
14. The application (Page 5) indicates that the facility will be open seven (7) days per week, accepting vehicles from 7:00 am to 7:00 pm, with waste processing within the TS/MRF building 24 hours per day. All waste processing operations will take place within an enclosed building. This appears to indicate that all overhead doors will be closed when trucks are not entering or exiting the building. The applicant should confirm whether this is the case. **Applicant response: The applicant will provide testimony stating that the overhead doors are to be closed during off hours with no vehicles entering or exiting the facility.**

15. Section 3.3.1 of the Guidelines for Evaluation requires that the site plan identify the placement of all equipment, buildings, activities and areas related to the receipt, storage, processing and transferring of all unprocessed and processed recyclable materials.  
**Applicant response: The plans have been revised to identify the placement of all equipment, buildings, activities, and areas related to the receipt, storage, processing, and transferring of all unprocessed and processed recyclable materials.**
16. The application (Page 6) states that Class A separated materials may have their own chemistry bunkers outside once source separated. The location of any proposed chemistry bunkers should be shown on the plans. **Applicant response: The plans have been revised to show the location of proposed bunkers.**
17. The application (Page 6) states that once an open top trailer is full the trailer will be covered and stored on site prior to transport or transported immediately to its end destination by truck or rail. Storage areas for covered trailers should be shown on the plans. **Applicant response: The plans have been revised to show storage areas for covered trailers.**
18. It is recommended that the location of existing and proposed rail be shown on the plans, and that the application describe any improvements required and proposed to provide rail service to the facility. **The plans have been revised to show approximate locations of existing and proposed rail lines. A draft letter from SMS Rail Service, Inc. is included with the resubmission indicating that the rail line is in service up to West Broadway. The plans show extension of the rail line from West Broadway to Tilbury Road and along Tilbury Road to the facility site. The extension of the rail line and the use of the rail line for transporting waste is subject to the acquisition of the property needed for the railroad right-of-way, and subject to the approval of Salem County, the railroad owner.**
19. The plans show a paved area 205' wide x approximately 440 long adjacent to the building on the north side. It is recommended that the plans identify the purpose for this area, and any vehicle circulation, vehicle storage or material storage proposed in this area. **Applicant response: This area is intended for vehicle circulation and material drop-off via loading docks. The plans have been revised to show vehicle circulation within this area.**

### Traffic

20. **The impact statement has been revised to refer to the Traffic Engineering Assessment submitted for the project. It is recommended that the applicant provide testimony from the traffic engineer describing the traffic impact assessment.**

21. **It is recommended that the applicant provide testimony from the traffic engineer describing the anticipated number and type of vehicles entering and exiting the site during daytime and nighttime hours and during the AM and PM peak hours.**
22. The impact statement (Page 9) states that outbound waste, recyclables and Class B material will be loaded onto a combination of transfer trailers and roll-off containers, depending on the material type. **The impact statement has been revised to state that it is anticipated that the outbound material trucks will exit the site on a more regular schedule than collection vehicles are scheduled to arrive. It is recommended that the applicant provide testimony from the traffic engineer describing the anticipated number and type of transfer trailers, roll-off containers and other large vehicles entering and exiting the site.**
23. The impact statement (Page 9) states that a major goal of this development is to mitigate any potential traffic congestion to and from the facility. **It is recommended that the applicant provide testimony from the traffic engineer describing how potential traffic congestion to and from the facility will be mitigated.**
24. It is recommended that the applicant provide an exhibit showing proposed access routes, the location of the potentially impacted intersections, ownership of the roads, zoning and land uses along the proposed routes, and any impacts to bridges or other structures. **It is recommended that the applicant provide testimony from the traffic engineer describing the impacts to intersections, roadways and properties in the vicinity of the project, and future stop-controlled intersections.**
25. Consideration should be given to defining a specific haul route to and from the facility, to reduce impacts and potentially required improvements to County roads. A potential route would be to utilize only NJ Routes 45 and 49, S. Front Street, Grieves Parkway and Tilbury Road, CR #661 to and from the facility entrance. While there is a residential zone and uses along a portion of S. Front Street, there are also residential zones and uses along the other proposed access routes including Grieves Parkway, Yorke Street, Chestnut Street, Griffith Street, Grant Street, and Keasbey Street in Salem City; and Tilbury Road, South Tilbury Road, Amwellbury Road and Salem-Fort-Elfsborg Road in Elsinboro Township. **It is recommended that the applicant provide testimony from the traffic engineer describing the proposed truck routes to and from the facility.**
26. The application (Page 4) refers to a Traffic Flow Plan. This plan should be submitted for review. **It is recommended that the applicant provide testimony from the traffic engineer describing any necessary or proposed improvements to the signage, turning radii or pavement for the proposed truck routes to and from the facility.**
27. The application (Page 9) states that Tilbury Road is an interstate. Tilbury Road, CR #661 is a Salem County road. Based on the Salem County Land Development Standards, Tilbury Road is classified as an urban local road, with a planned right-of-way width of 66 feet. Based on the tax map the existing right-of-way width varies, and

it appears additional right-of-way would be required along the frontage of Lots 2 and 4 in order to provide a right-of-way width of 33 feet from the centerline. **Applicant response: Acknowledged. If it is determined that additional right-of-way is required along the site frontage then said additional right-of-way will be dedicated.**

28. Section 3.3.2 of the Guidelines for Evaluation requires that the applicant indicate the provisions incorporated into the site plan to ensure safe and efficient vehicular and pedestrian circulation, parking, loading and unloading. It is recommended that the plans address off-street parking for employees, visitors and the public; and acknowledge the responsibility to comply with the provisions for electric vehicle (EV) charging stations if applicable; and pedestrian circulation at the site for the safety of employees, visitors and the public. **Applicant response: The plans have been revised to address off-street parking and pedestrian circulation.**

### **Materials**

29. The application proposes that the facility will accept the following waste types: 10, 13, 13C, 23, 25 and 27. NJDEP regulations define each of the above waste type as follows [NJAC 7:26-2:13(g)1]:

- 10 Municipal (household, commercial and institutional): Waste originating in the community consisting of household waste from private residences, commercial waste which originates in wholesale, retail or service establishments, such as, restaurants, stores, markets, theatres, hotels and warehouses, and institutional waste material originated in schools, hospitals, research institutions and public buildings.
- 13 Bulky waste: Large items of waste material, such as appliances and furniture. Discarded automobiles, trucks and trailers and large vehicle parts, and tires are included under this category.
- 13C Construction and demolition waste: Waste building material and rubble resulting from construction, remodeling, repair, and demolition operations on houses, commercial buildings, pavements and other structures. The following materials may be found in construction and demolition waste: treated and untreated wood scrap; tree parts, tree stumps and brush; concrete, asphalt, bricks, blocks and other masonry; plaster and wallboard; roofing materials; corrugated cardboard and miscellaneous paper; ferrous and non-ferrous metal; non-asbestos building insulation; plastic scrap; dirt; carpets and padding; glass (window and door); and other miscellaneous materials; but shall not include other solid waste types.
- 23 Vegetative waste: Waste materials from farms, plant nurseries and greenhouses that are produced from the raising of plants. This waste includes such crop residues as plant stalks, hulls, leaves and tree wastes processed



through a wood chipper. Also included are non-crop residues such as leaves, grass clippings, tree parts, shrubbery and garden wastes.

- 25 Animal and food processing wastes: Processing waste materials generated in canneries, slaughterhouses, packing plants or similar industries, including animal manure when intended for disposal and not reuse. Also included are dead animals. Deceased animals that are intended for cremation in an animal crematorium with the residual ashes either returned to the pet owner or interred in a burial plot at a legally recognized pet cemetery, or deceased animals intended for internment at a legally recognized pet cemetery are not considered solid waste pursuant to this chapter. (Carcasses which are cremated at a crematorium but whose final destination of the residual ashes is a solid waste facility are considered disposed of and are considered solid waste pursuant to this chapter.) Animal manure, when intended for reuse or composting, is to be managed in accordance with the criteria and standards developed by the Department of Agriculture as set forth at N.J.S.A.4:9-38.
- 27 Dry industrial waste: Waste materials resulting from manufacturing, industrial and research and development processes and operations, and which are not hazardous in accordance with the standards and procedures set forth at N.J.A.C. 7:26G. Also included are nonhazardous oil spill cleanup waste, dry nonhazardous pesticides, dry nonhazardous chemical waste, and residue from the operations of a scrap metal shredding facility.

**Applicant response: Acknowledged.**

30. A letter from Giordano's dated July 9, 2024, was submitted with the application confirming that "*Giordano's shall not accept, receive, process or transfer any waste that originates within Salem County without the prior consent and written approval of Salem County, duly authorized by the Salem County Improvement Authority and/or the Salem County Board of Commissioners.*" The applicant should confirm that this letter is incorporated into the application. **Applicant response: The referenced letter was included with the application.**
31. The application (Page 8) indicates that the facility will receive an average of 1,000 tons per day (7,000 tons per week) of solid waste when operating at full capacity. **Applicant response: Acknowledged.**
32. The application (Page 7) states that construction and demolition (C&D) and packaging materials is made up of clean construction debris and residual plastics from processing plants, papers, cardboards, metal, aggregate and single use plastics. Along with concrete, brick, block clean nonhazardous soil and construction materials, and that this process of mixed products will take place under roof in a 30,000 to 50,000 SF building. It appears the description included in the application needs to be revised to agree with the plan, which shows a 100,000 SF building for processing of materials. **Applicant**

**response: The application and plans have been revised to clarify that the facility is intended to be built in phases.**

### **Class A Materials**

33. The application (Page 1) also proposes that the facility also accept Single Stream Class A recyclable materials, up to 1,000 tons per day. NJDEP regulations define Class A recyclable material as follows [NJAC 7:26A-1.3]:

- "Class A recyclable material" means a source separated non-putrescible recyclable material specifically excluded from Department approval prior to receipt, storage, processing or transfer at a recycling center in accordance with N.J.S.A. 13:1E-99.34b, which material currently includes source separated non-putrescible metal, glass, paper, plastic containers, and corrugated and other cardboard. **Applicant response: Acknowledged.**

34. According to NJDEP recycling information, in single stream programs, bottles, cans, and other containers, as well as paper grades are all collected together in one recycling bucket. **Applicant response: Acknowledged.**

35. The application (Page 6) indicates that Single Stream Class A materials will arrive on-site for intermediate processing in the same manner as solid waste. The material will be sorted on the industrial picking line or floor sorted and baled for further processing offsite. The application should state whether a baler is proposed. Details for any proposed baler should be provided. The location and size of any proposed baler should be shown on the plans. **Applicant response: The plans have been revised to indicate the locations of approximately 2,000 SF balers within each building section.**

36. The application (Page 7) states that the Class A part of the facility will be for the public to drop off metals, paper, plastics, all mandated and non-mandated recyclables that are already source separated. The plans should identify the location where the public will access the facility and drop off materials. **Applicant response: The plans have been revised to indicate the location of the public drop off.**

### **Class B Materials**

37. The application (Page 1) also proposes that the facility accept up to 700 tons per day of Class B material consisting of shingles, brick, block, concrete, non-hazardous soil, brush, stumps, trees and tree parts, wood (painted, unpainted and engineered) and tires. NJDEP regulations define Class B recyclable material as follows [NJAC 7:26A-1.3]:

- "Class B recyclable material" means a source separated recyclable material which is subject to Department approval prior to receipt, storage, processing or transfer at a recycling center in accordance with N.J.S.A. 13:1E-99.34b, and which includes, but is not limited to, the following:

1. Source separated, non-putrescible, waste concrete, asphalt, brick, block, asphalt-based roofing scrap and wood waste;
2. Source separated, non-putrescible, waste materials other than metal, glass, paper, plastic containers, corrugated and other cardboard resulting from construction, remodeling, repair and demolition operations on houses, commercial buildings, pavements and other structures;
3. Source separated whole trees, tree trunks, tree parts, tree stumps, brush and leaves provided that they are not composted;
4. Source separated scrap tires; and
5. Source separated petroleum contaminated soil.

**Applicant response: Acknowledged.**

38. The application (Page 7) states that Class B materials will be stockpiled in the unprocessed material storage area. The unprocessed material storage area should be shown on the plans. **Applicant response: The plans have been revised to indicate the location of the unprocessed material dumping areas.**
39. The application (Page 7) states that Class B materials will be ground on-site using mobile grinding equipment. The proposed grinding equipment and grinding area should be shown on the plans. **Applicant response: The plans have been revised to indicate the proposed grinding equipment and area.**
40. The application (Page 7) states that processed Class B material will be moved to the Processed Material Storage Area, where it may be stored for a period of up to one (1) year, and that the Processed Material Storage Area has a capacity of up to 12,000 cubic yards, subject to change. The Processed Material Storage Area should be shown on the plans. **Applicant response: The plans have been revised to indicate the processed material stockpile areas.**

**Class C Materials**

41. The application (Page 1) also proposes a Class C Decasing Area. NJDEP regulations define Class C recyclable material as follows [NJAC 7:26A-1.3]:
  - "Class C recyclable material" means a source separated compostable material which is subject to Department approval prior to the receipt, storage, processing or transfer at a recycling center in accordance with N.J.S.A. 13:1E-99.34b, and which includes, but is not limited to, organic materials such as: 1. Source separated food waste; 2. Source separated biodegradable plastic; 3. Source

separated yard trimmings, including any biodegradable paper bags in which the yard trimmings are collected; 4. Source separated biomass; and 5. Lakeweed generated from the cleaning of aquatic flora from freshwater lakes. [NJAC 7:26A-1.3]:

**Applicant response: Acknowledged.**

42. It is recommended that the application define the Class C Decasing process and the materials to be accepted, stored and processed. The Class C Decasing Area should be shown and identified as such on the plans. **It is recommended that the applicant describe the decasing process and the location where the Class C decasing is to take place.**
43. The applicant should indicate whether Class A, Class B, and Class C materials to be accepted at the facility will originate within Salem County. **Applicant response: The applicant will provide testimony that Class A, B, and C materials from Salem County will be accepted at the facility.**

**Materials Handling and Process Flow**

44. The plans should designate storage areas for each recyclable material that may be accepted at the facility. It is recommended that each area be identified by recyclable material Class for clarity. **Applicant response: The plans have been revised to indicate storage areas for each recyclable material to be accepted by the facility.**
45. The application (Page 4) states that unauthorized/hazardous waste received at the facility will be separated and stockpiled in an unauthorized/hazardous waste storage area. The unauthorized/hazardous waste storage area should be shown on the plans. **Applicant response: The plans have been revised to indicate the locations of sealed containers for unauthorized materials.**
46. The plans should show the location of all container storage and trailer storage. **Applicant response: The plans have been revised to indicate the location of all container and trailer storage.**

**Marketing Materials**

47. Section 3.3.5 of the Guidelines for Evaluation requires the following:
- *Name, address and telephone number of all planned end markets for the materials.*
  - *List all end market contracts or agreements and submit same as evidence of the applicant's ability to sell the products resulting from the proposed activities at the Facility. Where end market contracts or agreements are not available at the*

*time of application for a general approval to operate a recycling center, the applicant shall submit letters of interest from prospective end market users of the products resulting from the applicant's recycling operation. Letters of interest may be based on information provided by the applicant to prospective end market users such as a description of the equipment to be used at the facility and the specifications of the products resulting from facility operation.*

- *If the applicant is proposing to use intermediate solid waste processing facilities prior to the delivery of materials to a recycling end market, then the applicant shall describe the facilities being used for each material. Descriptions shall include location, capacity and the operations and/or processes the intermediate facilities will perform on the materials.*
- *Identify the disposal facility(ies) that will manage residue from the proposed facility. Indicate the consistency of utilizing this disposal facility(ies) with the current Solid Waste Management Plan.*

**Applicant response: Section II, subsection L of the application (“Marketing Materials”) provides a list of end markets including, but not limited to, Salem County Landfill, Cumberland County Landfill, South State, Inc., Giordano Vineland Scrap Material, Ardagh Glass, DS Smith, Sims Metal Management, and Bioenergy Devco.**

48. The application (Page 10) describes the end market for Class A materials (metal, plastic, paper, cardboard, etc.) as Giordano Vineland Scrap Metal, LLC; and the end market for Class B materials (wood, concrete masonry, brick, asphalt, non-hazardous soil, etc.) as Giordano Recycling. **Applicant response: Acknowledged.**
49. The application (Page 10) states that Salem County’s generated residual waste will be disposed of in accordance with the provisions of the Salem County District Solid Waste Management Plan. Non-Salem County generated waste will be disposed of in accordance with the appropriate District’s Solid Waste Management Plan. **Applicant response: Acknowledged.**
50. The application (Page 13) lists planned end markets. The application should indicate whether agreements are in place for all the materials to be transported from the proposed facility. **Applicant response: While agreements are not in place at this time, the applicant has a long-standing relationship with the facilities identified in the application to accept refuse. Written agreements can be supplied upon DEP approval of the facility.**
51. The application (Page 10) describes a contingency plan for waste handling during short term and long-term shutdown, such as equipment failure, structural damage, vehicular accident or other unforeseen events. In the case of short-term facility shutdown (not to exceed 48 hours), material will be stored within the building. In the case of long-term

shutdown, NJDEP will be notified and inbound vehicles will be routed to other facilities, or to separate lines for processing or scales for inbound and outbound. In this case, the companies that haul material to the facility would be advised to redirect their trucks to another TS/MRF or to the Salem County Landfill. **Applicant response: Acknowledged.**

52. It is recommended that the applicant indicate whether an agreement is in place with the Salem County Improvement Authority for acceptance of waste materials during facility shutdown, or in the event that end markets are unavailable. **Applicant response: While an agreement is not in place at this time, a written agreement can be supplied upon DEP approval of the facility.**

### Access Control

53. Section 3.3.6 of the Guidelines for Evaluation requires that the applicant list proposed means to control and/or limit access to the proposed facility, both during and after operating hours. The application (Page 4) describes proposed video monitoring and security, and safety managers. It is recommended that the plans show any proposed gates or security fence at the facility. **Applicant response: The plans have been revised to indicate locations of proposed security fencing and masonry walls along the entrance to the facility. As the plans are finalized with the DEP, updates regarding security measures will be provided to the City and County.**

### Other Approvals

54. In accordance with Section 1.2 of the Guidelines for Evaluation, the applicant shall identify any local, state, or federal permits and/or approvals that may be required for the proposed Facility. As the permits and/or approvals are applied for, the applicant shall provide SWAC with full copies of each application. The application states that the following permits are required:

- A-901 approval (New Jersey Department of Law & Public Safety)
- NJDEP Solid Waste Facility Permit
- NJDEP Air Quality Permit
- Cumberland-Salem Conservation District Certification
- Department of Community Affairs – Building Permits

**Applicant response: Acknowledged. A copy of each application package will be provided to SWAC at the time the applications are made.**

55. The impact statement states that the property contains wetlands which have not yet been verified by NJDEP in a letter of interpretation (LOI) and that development of the property will comply with all NJDEP requirements and approvals, including, if necessary, the establishment of conservation easements to protect environmentally

sensitive areas. It appears that required NJDEP approvals may include wetlands and flood hazard area permits. **Applicant response: Acknowledged.**

56. The impact statement states that the project will comply with NJDEP stormwater management regulations for major development at N.J.A.C. 7:8, that all necessary stormwater/outfall permits required by NJDEP will be obtained during the design and permitting phase of the project. **Applicant response: Acknowledged.**
57. The applicant should confirm whether the project will comply with the Salem County Land Development Standards, and whether an application for site plan approval will be submitted to the Salem County Planning Board. **Applicant response: An application for site plan approval will be submitted to the Salem County Planning Board.**
58. Salem County Road Opening Permits will be required for road openings within County roads. **Applicant response: Acknowledged.**
59. The plans show water and sewer services from Tilbury Road, CR #661. The impact statement (Page 10) indicates that the appropriate Salem City, NJDEP and any other approvals will be obtained for water and sewer service. **A letter from New Jersey American Water was submitted stating that water and sewer service is available to the property.**
60. It is recommended that plans be submitted to the appropriate fire and emergency services agency for review and comment regarding site access and circulation by emergency vehicles. **Applicant response: The proposed plans will be submitted to the appropriate fire and emergency services agency for review and comment.**

#### **Salem County Solid Waste Management Plan Consistency**

61. Section 3.5 of the Guidelines for Evaluation requires the following:

- *List the significant benefits the facility will have on the community.*
- *List the significant negative impacts the facility will have on the community and mitigating measures taken.*
- *Describe why there is a need for the facility.*
- *Describe, by percent, the anticipated geographic points of generation, i.e. towns, county and/or state of each solid waste types accepted. Include the sector of the community, i.e. commercial, residential, industrial for each waste type and list any restrictions if any.*

- *Additional Pertinent Information: The applicant shall provide any additional information in their application that is pertinent to their proposal. In addition, the SWAC reserves the right to request any additional information.*

**Applicant response: Section II, subsection M of the application details the benefits and negative impacts to the community, including a previously submitted County Presentation as well as the Impact Statement provided with this resubmission.**

62. The application (Page 13) refers to an attached County Presentation setting forth several benefits to the community. The applicant should confirm that the County Presentation was submitted with the application. **It is recommended that the applicant describe the referenced County Presentation and the benefits it sets forth.**
63. The application (Page 13) refers to the impact statement regarding negative impacts, and states that additional minor impacts may include trucks backing up, which the applicant plans to buffer; odd trucks that may get off route, they will be guided with GPS in the trucks. Giordano's does not believe there are many negative impacts for this project which will reuse an old non-used landfill. **Applicant response: Acknowledged.**

**Miscellaneous**

- 64. Some of the details included in the application need to be updated to be consistent with the revised plans and impact statement.**

Should there be any questions please do not hesitate to contact our office.

Very truly yours,

ALAIMO GROUP

  
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James H. McKelvie, PE, CME  
Senior Associate

JHM