

Let's protect our earth



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
RICHARD T. DEWLING, Ph.D., P.E., COMMISSIONER
CN 402
TRENTON, N.J. 08625
609 - 292 - 2885

(IN THE MATTER OF CERTAIN AMENDMENTS)
(TO THE ADOPTED AND APPROVED SOLID)
(WASTE MANAGEMENT PLAN OF THE)
(WARREN COUNTY SOLID WASTE)
(MANAGEMENT DISTRICT)

CERTIFICATION
OF THE AUGUST 12, 1987
AMENDMENT TO THE WARREN COUNTY DISTRICT
SOLID WASTE MANAGEMENT PLAN

BY ORDER OF THE COMMISSIONER:

A. Introduction

The New Jersey Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) established a comprehensive system for the management of solid waste in New Jersey. The Act designated all twenty-one (21) of the state's counties, and the Hackensack Meadowlands District, as Solid Waste Management Districts, and mandated that the Boards of Chosen Freeholders and the Hackensack Meadowlands Development Commission develop comprehensive plans for waste management in their respective districts. On October 16, 1981, the Department approved, with modifications, the Warren County District Solid Waste Management Plan.

The Act requires that all district plans be based on and accompanied by a report detailing the existing waste disposal situation in the district, and a plan which includes the strategy to be followed by the district in meeting the solid waste management needs of the district for the ten-year planning period. The report must detail the current and projected waste generation for the district, inventory and appraise all facilities in the district, and analyze the waste collection and transportation systems which serve the district. The disposal strategy must include the maximum practicable use of resource recovery techniques. In addition to this strategy, the plan must designate sufficient available suitable sites for the disposal of the district's waste for the ten-year period, which sites may be in the district or, if none are available, in another district. (The Act provides procedures for reaching any necessary interdistrict agreements.)

The Act further provides that a district may review its plan at any time and, if found inadequate, a new plan must be adopted. The Warren County Board of Chosen Freeholders completed such a review and on August 12, 1987, adopted an amendment to its approved district solid waste management plan which incorporates a waste disposal contingency plan. The following is background information regarding the Warren County Contingency Plan submission.

The Warren County policy for long term solid waste management is to construct a resource recovery facility and a district landfill. The resource recovery facility has been under construction since July 31, 1986 and is expected to be operational by Summer/Fall 1988. The permit to construct and operate the landfill was issued in October 1987 with an anticipated opening by mid 1988. When both these facilities are functional, it is anticipated that the waste disposal requirements for the county will be accommodated for the next twenty years.

Currently, the waste haulers operating within Warren County have negotiated disposal agreements with G.R.O.W.S. Landfill in Falls Township, Pennsylvania. The short-term plan for waste disposal is to continue this arrangement prior to operation of the resource recovery and landfill facilities.

This August 12, 1987 contingency plan amendment is in response to a February 23, 1987 letter sent to Warren County, as well as to all other New Jersey counties, requesting that a contingency plan be submitted to the Department which demonstrated that the county had plans to provide waste disposal in the event of certain emergency situations. In response, on April 3, 1987, Warren County submitted a draft contingency plan with three options in case of disposal emergencies. The plan first provided for direct haul to out-of-state transfer and disposal facilities as the county's short-term alternative. A second option was recommended by the Warren County Solid Waste Advisory Council (WCSWAC) for a temporary transfer station to be constructed by the haulers if nearby Pennsylvania landfills were unavailable to the county. A third contingency alternative involved the resource recovery facility once it comes on line. In the event of failure of the facility, the county will continue to use the Warren County District Landfill which is expected to be operational by July 1, 1988.

In its review of Warren County's April 3, 1987 draft contingency plan, the Department noted that the county did provide waste generation and disposal capacity data as required and had identified the in-county disposal shortfall which would occur until mid 1988. However, the submission failed to identify backup landfills which could be used in the event of sudden closure, such as occurred with the closure of Keystone Landfill in Pennsylvania to North Jersey counties. Additionally, the submission failed to develop policy response options to being closed out of other states, to delays in the development of both in-county resource recovery and landfill facilities, or to temporary disruptions that could occur once both in-county facilities are operational.

The Department then recommended four modified policy response options for the county's consideration.

1. Alternative out-of-state landfill operations should be identified to be utilized in conjunction with an in-county transfer station if there is a loss of disposal privileges at currently used facilities, or if there are delays in development of the county landfill.

2. Terminated facilities within Warren County that have available air space could be reopened to provide interim capacity until the long-term resource recovery and landfill facilities are operational.
3. Construction of an emergency cell or the reopening of previously used cells at the county landfill, after it is operational, should be evaluated.
4. The development of additional reciprocal interdistrict agreements that would provide for the redirection of waste flows on an emergency basis should be assessed.

In its final contingency plan submission, adopted as a plan amendment, the county has provided an update of its solid waste generation. The county has determined that its solid waste will increase from 253 tons/day in 1987 to 277 tons/day by 1991. At an annual rate, this increase would be about 2000 tons/year from 92,540 in 1987 to 101,160 tons/year in 1991. Based on this analysis, the county had determined that a shortfall in disposal capacity will exist between the present and mid 1988 until operation of the county resource recovery and landfill facilities. In addition to providing for this shortfall in capacity, the need exists for contingency options that will provide for disposal capacity if the resource recovery and/or landfill are shut down for any reason.

The final contingency plan enumerated three major policy alternatives in response to certain 'trigger events'.

1. Direct Haul: In the event that there is any termination of disposal capacity at G.R.O.W.S., the Warren County Board of Chosen Freeholders and the Pollution Control Financing Authority (the county's waste management implementation agency) will work with the waste haulers to expedite the selection of and negotiation for alternative out-of-state disposal capacity.
2. Transfer Station: In the event that Warren County waste haulers are required to utilize more distant disposal sites prior to the opening of in-county disposal facilities, or at a later date if the in-county facilities are unavailable, then some form of load consolidation and transfer to long-haul vehicles will be required. The county has determined that the most suitable site, from the standpoint of location, accessibility and current in-depth environmental evaluation, appears to be the present district landfill site.
 - a. If the problem of disposal is expected to be a relatively short-term event, then the county envisions as most appropriate, a temporary transfer station, located on the county-owned site and operated either by the Pollution Control Financing Authority or under contract by a private operator. It is expected that a temporary transfer station could be put in place and become operational within 30 days.

- b. If the waste disposal problem could persist for a protracted period, then a more permanent baling facility could be constructed for waste compaction and transport to a designated out-of-state disposal site. Such a facility would be designed by the Authority and constructed and operated by a private vendor selected through the public bidding process. If a permanent facility was needed, a 90 to 180 day time period would be required.
 - c. In the event of a waste disposal emergency, an immediate meeting will be held with the Authority, freeholders and key county staff personnel, including the solid waste coordinator, county administrator, county engineer and health officer to assess the extent and length of the problem.
3. **Emergency Cell or Reopen Used Cell:** In the event that an emergency arises after the Warren County District Landfill has been constructed, then the consulting engineer for solid waste, together with the Pollution Control Financing Authority, will evaluate the circumstances of the problem at the landfill, and will determine if an emergency cell should be constructed or a previously used cell should be reopened.

The above noted Warren County Contingency Plan Amendment was received by the Department of Environmental Protection on September 4, 1987, and copies were distributed to various state level agencies for review and comment, as required by law. The Department has reviewed this amendment, and has determined that the amendment adopted by the Warren County Board of Chosen Freeholders on August 12, 1987, is approved, with modification, as provided in N.J.S.A. 13:1E-24, and as further addressed in Section C. below.

B. Findings and Conclusions with Respect to the Warren County District Solid Waste Management Plan Amendment

Pursuant to N.J.S.A. 13:1E-24a(1), I, Richard T. Dewling, Commissioner of the Department of Environmental Protection have studied and reviewed the August 12, 1987 amendment to the Warren County District Solid Waste Management Plan according to the objectives, criteria, and standards developed in the Statewide Solid Waste Management Plan, and I find and conclude that this plan amendment is consistent, as modified, with the Statewide Solid Waste Management Plan.

The Division of Solid Waste Management circulated the plan amendment to sixteen review agencies and solicited their review and recommendations. Pursuant to N.J.S.A. 13:1E-24a(2) and (3), these agencies included various agencies, bureaus, and divisions within the Department of Environmental Protection as well as the Board of Public Utilities. Also among these agencies were the Department of Community Affairs, the Department of the Public Advocate, the Department of Health, the Office of Recycling, the Department of Agriculture, the Department of Transportation, and the New Jersey Turnpike Authority. Of these agencies, the following did not object to the proposed plan amendment: the N.J.D.E.P. Division of Fish, Game and Wildlife, the State Departments of Agriculture, Health, Transportation and

Community Affairs; the Green Acres Program, the New Jersey Turnpike Authority, and the New Jersey Advisory Council on Solid Waste Management. The following agencies failed to respond to our requests for comments: the Department of the Public Advocate and the U.S. Environmental Protection Agency. The following agencies submitted substantive comments which are further addressed below: the N.J.D.E.P. Divisions of Environmental Quality, Parks and Forestry, Solid Waste Management, and Water Resources, the Office of Recycling, and the Board of Public Utilities.

1. Comments on Siting and Construction of a Transfer Station

The Division of Solid Waste Management's Bureau of Resource Recovery noted that a solid waste facility permit is required to consolidate or transfer solid waste from a collection vehicle to a transfer vehicle. The Department comments that under emergency conditions set forth in N.J.A.C. 7:26-1.10, the Department could issue a master performance permit (MPP) in approximately 30 days. The public bidding process would probably add an additional 30 days and construction could require 90 to 180 days, depending on the performance level required by the permit conditions. Further, since the Warren County Landfill site has been designated as a site for the transfer station in the contingency plan, no additional plan amendment and public hearing process will be necessary to site the transfer station. A modification of the current amendment will be necessary to clarify which entity, the county and/or the haulers, would design and construct the interim facility.

The Division of Parks and Forestry's Office of New Jersey Heritage requested the opportunity to review any contingency site locations once such locations have been identified. The Department responds that the county has designated the location for the transfer station adjacent to its landfill facility in White Township on the same site. Since the transfer station will be an interim facility permitted through a Master Performance Permit, responding to an emergency situation, no other plan amendment, public hearing or state review would be mandated.

The Division of Water Resources' Bureau of Ground Water Quality Management notes that in the event that a temporary or more permanent transfer station is needed, the transfer station must include provisions for adequate ground water monitoring. The Department responds that an interim or permanent transfer facility will be required to be in compliance with all ground water regulations and permits as conditioned in an MPP.

2. Comments on Use of Reopened Cells or Construction of an Emergency Cell

The Division of Environmental Quality's Bureau of Air Quality Planning and Evaluation indicated that new and closed landfills should be equipped with positive vent systems which direct landfill gases to air pollution control devices. These devices require air pollution control permits pursuant to N.J.A.C. 7:27-8.2[a] 1 and 16. These regulations require permits for all stationary equipment used to ventilate a solid waste facility directly or indirectly to the ambient

atmosphere. The Department responds that in the case of reopening a cell in the Warren County Landfill, the necessary vents would be in place, having been required under the permit conditions issued for initial construction of the landfill. With respect to construction of an emergency cell, the Bureau of Air Quality would be consulted as to necessary emergency air pollution measures.

The Division of Solid Waste Management's Bureau of Sanitary Landfill Closure stated while reopening a used cell was the more feasible of the two possibilities, the county would have to submit some design and engineering plans. The Department noted that the county would be required to submit emergency plans showing the proposed final configuration and a final cell height not to be exceeded. In order to avoid delay during an emergency event, the county would be required to submit a conceptual design for the emergency cell, an indication of the length of time the cell would be in use, and a method and time-frame for excavating the disposed waste subsequent to termination of use of the emergency cell.

3. Other Comments on the Contingency Plan

The Office of Recycling reviewed the plan and found it to be inconsistent with the goals of the Statewide Solid Waste Management Plan. Specifically, the Office of Recycling has the following comments. In the updated solid waste generation data of Section 14, page 80, no mention is made of the effect that the district mandatory recycling plan will have on the waste generation quantities listed for the years 1987 through 1991. This discrepancy must be satisfied for the Office of Recycling to determine if the goals of P.L. 1987, c. 102 have been in the proposed contingency plan. In assessing the need for immediate additional short term disposal capacity, the county has chosen "triggering" events such as the closing of G.R.O.W.S. landfill in eastern Pennsylvania. Prior to the county assessing its needs for additional disposal capacity, the Office of Recycling recommends that the county establish a policy that will assess the potential to increase recycling of municipal waste. The Department responds that the request to counties for contingency plans required waste generation data over time, exclusive of a percentage of recycled waste. In the submission of its final recycling plan, the county has an opportunity to offer an evaluation for the potential to increase recycling efforts to curtail the waste stream. This information could be used in the Department's future assessment of emergency plans for direct haul, use of an emergency transfer station, or reopened landfill cell or emergency cell. The duration of response and/or size of the emergency facility could be conditioned by the amount of waste to be recycled.

The Board of Public Utilities (BPU) notes that inasmuch as the county's contingency plan may have an adverse effect on the disposal rates for haulers subject to the Board's jurisdiction, Warren County will need to coordinate their plans with the BPU staff upon implementation of the contingency plan. The Department agrees and responds that emergency waste flow redirections and adjusted disposal rates would have to be submitted to the BPU.

4. Comments on Policy Options Not Considered in Contingency Plan

Three of the recommendations offered by the Division of Solid Waste Management in response to the draft contingency plan were discounted by the county; negotiating alternate out-of-state contracts with disposal facilities on behalf of the county haulers, consideration of reopening terminated landfills, and establishment of interdistrict agreements with other counties for disposal capacity.

- a. Direct Haul: The county stated that they had specifically avoided identifying and negotiating with alternative out-of-state disposal sites on the basis that the waste haulers were more knowledgeable about the opportunities open and locations available. Further, the county maintains that the independent waste haulers are better able to negotiate effectively with the disposal site operators, producing better service with fewer disruptions and at a somewhat lower cost to county residents than some other counties. The Department responds that this arrangement, if demonstrably satisfactory for the county, is acceptable. However, the development of a list of landfills with excess capacity would be of value to the county/haulers in an emergency.
- b. Reopening Terminated Landfills: The county noted that the only terminated landfill that could be considered is the High Point Landfill in Franklin Township. Since control of this facility had been assumed by the Department at the direction of the Chancery Division of the Superior Court, it is not within Warren County's jurisdiction to make a decision as to whether or not to reopen the High Point Landfill. The Division of Water Resources, Bureau of Ground Water Quality Management stated that because the High Point Landfill is a closed landfill, equipped with a permanent clay cover, any disruption to the facility which would necessitate recapping is inappropriate. The NJDEP is currently performing a Remedial Investigation/Feasibility Study (RI/FS) at the site which will result in the selection of a remedial action plan. The Division of Water Resources does not believe that reopening High Point is a feasible option. The Department generally concurs with the county in this assessment. However, future consideration should be given to reopening closed landfills as an emergency option. In Warren County, facilities such as Crouse, Hope Township, Independence Township and Belvidere-White Township landfills, might be considered.

- c. **Development of Interdistrict Agreements:** With respect to interdistrict agreements, the county believes that the development of additional interdistrict agreements for emergency waste flow is not a feasible option at the present time due to the critical shortage of disposal capacity in New Jersey. As new facilities come on line and the situation changes within the state, the county indicated that they will consider negotiation with other counties for backup disposal capacity. The Department responds that, presently, Warren County and Hunterdon County have an interdistrict agreement allocating 100 tons per day of Hunterdon waste to the future Warren County resource recovery facility. Hunterdon County, which generates approximately 350 tons per day, hosts a 400 ton per day transfer station. Some reciprocal agreement could be negotiated which enables Warren County to utilize the Hunterdon facility for emergency situations. Further, a transfer station to process some 200 to 300 tons per day of waste in neighboring Sussex County is under construction, offering another opportunity for an interdistrict agreement for emergency disposal. In an effort to build regional waste agreements, conserve land and reduce the economic impact of waste disposal in emergency situations, efforts should be made by the county to seek an interdistrict agreement with a neighboring county for emergency disposal in preference to construction of interim facilities. The Department will work constructively with the county to achieve this goal.

C. Certification of the Warren County District Solid Waste Management Plan Amendment

I, Richard T. Dewling, Commissioner of the Department of Environmental Protection, in accordance with N.J.S.A. 13:1E-1 et seq. and N.J.S.A. 13:1E-21, which established specific requirements regarding the contents of the district solid waste management plans, have reviewed the August 12, 1987, amendment to the approved Warren County District Solid Waste Management Plan and certify to the Warren County Board of Chosen Freeholders that the August 12, 1987 amendment is approved, with modifications, as further specified below.

The Warren County contingency plan, as described in Section B., which incorporates the policy options of: direct haul to an out-of-state disposal facility; construction of an interim transfer station sited adjacent to the county landfill in White Township, with out-of-county disposal; and reopening of a closed landfill cell or construction of an interim emergency cell at the county landfill, is approved.

Construction or operation of any solid waste facility shall be preceded by the acquisition of all necessary permits and approvals under N.J.S.A. 13:1E-1 et seq. Issuance of the operating permits pursuant to the Solid Waste Management Act is limited to those applicants found by the Department and the Attorney General to be deserving of licensing under the provisions of N.J.S.A. 13:1E-126 et seq.

Further, the Department modifies the amendment as follows:

1. A clarification is to be submitted to determine which agency, the county and/or the haulers, would assume responsibility for construction of an interim transfer station, should the need arise. The above change has been determined to be minor in nature. Therefore, the county shall amend the plan pursuant to N.J.S.A. 13:1E-24d.
2. Preparation of a conceptual design for an emergency cell at the Warren County Landfill, in order to avoid delay during an emergency event, shall be submitted within 90 days.

D. Other Provisions Affecting the Plan Amendment

1. Contracts

Any contract renewal or new contract for solid waste collection or disposal which is inconsistent with the within amendment to the Warren County District Solid Waste Management Plan and which was executed prior to the approval of this amendment and subsequent to the effective date of the Solid Waste Management Act (July 29, 1977), and which shall further be for a term in excess of one year, shall immediately be renegotiated in order to bring same into conformance with the terms and provisions herein set forth. Any solid waste collection operation or disposal facility registered by the Department of Environmental Protection and operating pursuant to a contract as herein described, shall be deemed to be in violation of this amendment and of the Warren County District Solid Waste Management Plan if such renegotiation is not completed within ninety (90) days of the effective date of this amendment; provided, however, that any such registrant may, upon application to the Department of Environmental Protection, and for good cause shown, obtain an extension of time to complete such renegotiation.

2. Compliance

All solid waste facility operators and collector/haulers registered with the Department of Environmental Protection and operating within Warren County and affected by the amendment contained herein shall operate in compliance with this amendment and all other approved provisions of the Warren County District Solid Waste Management Plan. Any facility operator or collector/hauler who fails to comply with the provisions contained herein shall be deemed to be in violation of N.J.S.A. 13:1E-1 et seq., in violation of N.J.A.C. 7:26-1 et seq., and in violation of their registration to operate a solid waste facility or a collection system issued thereunder by the Department of Environmental Protection and shall be subject to the provisions and penalties of N.J.S.A. 13:1E-9 and 12 and all other applicable laws.

3. Types of Solid Wastes Covered by the District Solid Waste Management Plans

The provisions of the Warren County District Solid Waste Management Plan shall apply to all solid wastes defined in N.J.S.A. 13:1E-3 and N.J.A.C. 7:26-2.13 and shall not apply to liquid wastes, sewage sludge, septage, and hazardous wastes. Also, all non-hazardous materials separated at the point of generation for sale or reuse are excluded from the waste flows designated in the Interdistrict and Intradistrict Solid Waste Flow Rules (N.J.A.C. 7:26-6).

4. Certification to Proceed with the Implementation of Plan Amendment

This document shall serve as the certification of the Commissioner of the Department of Environmental Protection to the Warren County Board of Chosen Freeholders and pursuant to N.J.S.A. 13:1E-24c. and f., the county shall proceed with the implementation of the approved amendment contained herein.

5. Definitions

For the purpose of this amendment and unless the context clearly requires a different meaning, the definitions of terms shall be the same as those found at N.J.S.A. 13:1E-3 and N.J.A.C. 7:26-1.4 and 2.13.

6. Effective Date of Amendment

The amendment to the Warren County District Solid Waste Management Plan contained herein shall take effect immediately.

7. Reservation of Authority

Nothing contained herein shall be construed as a limitation on any other action taken by the Department of Environmental Protection pursuant to its authority under the law. The Warren County District Solid Waste Management Plan, including any amendment made thereto, shall conform with the Statewide Solid Waste Management Plan. The Department has published a Statewide Solid Waste Management Plan with appendices which includes the Department's planning guidelines and rules, regulations, and orders of the Department, including the interdistrict and intradistrict waste flow rules, and also includes the compilation of individual district plans and amendments as they are approved.

E. Certification of Approval with Modification of the Amendment by the Commissioner of the Department of Environmental Protection

In accordance with the requirements of N.J.S.A. 13:1E-1 et seq, I hereby approve, with modifications, the amendment as outlined in Section B. of this certification, to the Warren County District Solid Waste Management Plan which was adopted by the Warren County Board of Chosen Freeholders on August 12, 1987.

February 2, 1988

DATE



RICHARD T. DEWLING
COMMISSIONER
DEPARTMENT OF ENVIRONMENTAL PROTECTION



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF SOLID WASTE MANAGEMENT
CN 414, Trenton, N.J. 08625

Michael F. DeBonis
Acting Director

FEB 01 1988

MEMORANDUM

TO: Donald A. Deieso, Assistant Commissioner
Environmental Management and Control

FROM: Michael F. DeBonis, Acting Director
Division of Solid Waste Management *Michael F. DeBonis*

SUBJECT: Briefing on an Adopted Amendment to the Warren County
District Solid Waste Management Plan

On August 12, 1987, the Warren County Board of Chosen Freeholders adopted an amendment to their district solid waste management plan. The amendment proposes to incorporate a contingency plan which enumerates three major policy alternatives in response to certain events disruptive to the disposal of solid waste: direct haul to out-of-state disposal facilities; siting and construction of an interim transfer station; and the reopening of a used cell or construction of an emergency cell at the Warren County Landfill.

The amendment was considered complete for state level review on September 4, 1987, and copies were circulated for comment on September 10, 1987. A second request for comments from those agencies that had not responded was sent on October 9, 1987. The proposed certification approves the policy options of direct haul to an out-of-state disposal facility, siting and construction of an interim transfer station, and reopening a closed cell or construction of an emergency cell at the Warren County Landfill.

Further, the Department has modified the amendment to reflect the following requirements: clarification of which entity, the county and/or the waste haulers, will be responsible for construction of the transfer station; and preparation of a conceptual design for an emergency cell.

The following is a summary of the participation by the state level review agencies concerning the August 12, 1987 amendment:

- A. The following agencies had no objections to the August 12, 1987 amendment:

Division of Fish, Game and Wildlife
Green Acres Program
New Jersey Turnpike Authority
New Jersey Advisory Council on Solid Waste Management
Department of Agriculture
Department of Health
Department of Transportation
Department of Community Affairs

- B. The following agencies provided substantive comments as shown in Section B. of the certification document:

Division of Environmental Quality
Division of Parks and Forestry
Division of Solid Waste Management
Division of Water Resources
Office of Recycling
Board of Public Utilities.

- C. The following agencies failed to respond to our requests for comment:

Department of the Public Advocate
U. S. Environmental Protection Agency

Schedule for Certification

The amendment was considered complete on September 4, 1987. Therefore, the Commissioner has 150 days or until February 2, 1988 to certify the amendment.

HK:lp
Attachment

Let's protect our earth



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
RICHARD T. DEWLING, Ph.D., P.E., COMMISSIONER
CN 402
TRENTON, N.J. 08625
609 - 292 - 2885

February 2, 1988

Honorable Anthony E. Fowler
Director
Warren County Board of Chosen Freeholders
Wayne Dumont, Jr. Administration Building
Belvidere, New Jersey 07823

Dear Freeholder Director Fowler:

Enclosed is the certification of your solid waste plan amendment which the Warren County Board of Chosen Freeholders adopted on August 12, 1987.

The amendment incorporates a contingency plan which enumerates three major policy alternatives in response to certain events disruptive for the disposal of solid waste: direct haul to out-of-state disposal facilities; siting and construction of an interim transfer station; and the reopening of a used cell or construction of an emergency cell at the Warren County Landfill.

All three of these options are approved. Further, the Department has modified the amendment to reflect the need for clarification as to which entity, the county and/or the waste haulers, will assume responsibility for construction of the transfer station, and to require preparation of a conceptual design for an emergency cell.

Warren County is to be congratulated, again, for its constant, consistent and professional pursuit of solid waste management policies that will provide its residents with present and future waste disposal security.

Sincerely,

Richard T. Dewling
Richard T. Dewling

A large, stylized handwritten signature in black ink, appearing to be "R. Dewling".