



December 22, 2011

Mail Code 401-02C  
Ross M. Hull, Environmental Specialist 3  
NJDEP Solid & Hazardous Waste Management Program  
Bureau of Recycling & Planning  
P.O. Box 420  
Trenton, NJ 08625-0420

**RE: Administrative Action Request: Plan Inclusion Clarification/Modification  
Morris County MUA – Class “B” & Class “C” Vegetative Waste Facility, Parsippany  
and Class “B” & Class “C” Vegetative Waste Facility, Mount Olive**

Dear Mr. Hull:

This administrative action (“AA”) request is provided to clarify the existing Solid Waste Management Plan (“Plan”) inclusion of the above referenced sites to make it consistent with the NJDEP general approval provided for these two sites. This AA request is meant to clarify the sites’ Plan inclusion and modify it to bring it into agreement with the General Approvals to Operate (“GA”). This request for administrative action does not propose to change the processing of material from what has been occurring in accordance with the general approvals. The 4 specific changes to the Plan are requested as follows:

1. With respect to the Parsippany site (Block 7; Lot 2 and located at 500 West Hanover Ave., Parsippany) modify the Class “C” operation’s capacity limit to be 48,800 CY of unprocessed material to be on site at one time as opposed to 63,000 CY accepted annually. The current GA allows the MCMUA to have approximately 48,800 cubic yards of Class C recyclables on site at one time.
2. With respect to the Parsippany site (Block 7; Lot 2 and located at 500 West Hanover Ave., Parsippany) modify the Class “B” operation’s capacity limit to 6,700 CY of unprocessed material to be on site at one time as opposed to 3,500 CY accepted annually. Additionally, modify the inclusion of the Class “B” brush grinding operation to eliminate the 4” limitation on the diameter of the brush that is allowed to be processed. This is being eliminated since it was based on a regulation that is no longer applicable. The revised size limitation requested is to be based on the ability of the site’s equipment to process such material.
3. With respect to the Mount Olive site (Block 400; Lot 1 and Block 401; Lot 4 and located at Waterloo Road, Mount Olive) modify the Class “C” operation’s capacity limit to be 47,900 CY of unprocessed material to be on site at one time as opposed to 94,000 CY accepted annually. The current GA allows the MCMUA to have approximately 47,900 cubic yards of Class C recyclables on site at one time.

4. With respect to the Mount Olive site (Block 400; Lot 1 and Block 401; Lot 4 and located at Waterloo Road, Mount Olive) modify the Class "B" operation's capacity limit to be 29,500 CY of Class B recyclables on site at one time. The current GA allows the MCMUA to have 29,400 CY of Class C recyclables on site at one time and limits the receipt of Class B recyclables at the site to 152 tons per day. It is the MCMUA's understanding that the Department will be adjusting the GA's limitation on brush from 29,400 CY to 29,500 CY in the next renewal process due to an error in its calculations.

State regulations, specifically N.J.A.C. 7:26-6.11 (b)-5, allow for modifications to be made to the Plan with respect to the operation of existing facilities through an administrative action procedure. This administrative action procedure permits the county's designated implementing agency, which is the MCMUA, to submit a letter to the NJDEP describing and requesting the changes to the Plan in lieu of going through the more formal and time-consuming Plan amendment process. The MCMUA formally requests the Plan be modified as described above in accordance with this administrative action process.

If you have any additional questions on this request please contact me.

Sincerely,

  
Larry Gindoff  
Solid Waste Coordinator

Enclosure

Cc: Glenn Schweizer, MCMUA Executive Director