

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 4  
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May 26, 2017

Prince Knight  
Environmental & Compliance Manager  
Tradebe Environmental Services, LLC  
[Prince.knight@tradebe.com](mailto:Prince.knight@tradebe.com)

Dear Mr. Knight,

The New York State Department of Environmental Conservation (“the Department”) received your permit modification request on April 3, 2017. The subject of the request is the reconfiguration of your treatment system to use hydrogen peroxide (50%) in place of chlorine bleach (sodium hypochlorite). The Department requires additional information to determine whether the proposed treatment system modification requires the submission of an Approvable Engineering Report. Additionally, this process change may necessitate a permit modification.

Please respond to the following:

- Identify the current concentrations of pollutants that may be affected;
- Explain how hydrogen peroxide will constitute “equivalent or superior treatment” as outlined in 6 NYCRR 750-2.10 (h);
- Describe potential byproducts or increases in concentrations of other pollutants.

Regarding the interim study, please provide more detail on the following:

- Specify which SPDES parameters will be subject to increased monitoring;
- Identify which intermediate sampling points and parameters may be tested;
- Predetermine the metrics that will be used to define a successful study;
- Provide confirmation that the study has a high probability of success and will not adversely affect the community (e.g. odors).

Please feel free to contact me if you have any questions regarding this letter.

Sincerely,



Kate Kornak  
Division of Environmental Permits

cc: NYSDEC Division of Water  
Tradebe Env. Services

