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November 7, 2025

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

Project Name	: United Material Management of Leominster
Project Municipality	: Leominster
Project Watershed	: Nashua River
EEA Number	: 16878
Project Proponent	: United Material Management of Leominster, LLC
Date Noticed in Monitor	: September 10, 2025

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Draft Environmental Impact Report (DEIR) and hereby determine that it **adequately and properly** complies with MEPA and its implementing regulations. The Proponent may prepare and submit for review a Final Environmental Impact Report (FEIR).

Project Description

As described in the Draft Environmental Impact Report (DEIR), the project consists of increasing the waste handling capacity of an existing transfer station from 1,000 tons per day (tpd) (300,000 tons per year (tpy)) to 1,500 tpd (450,000 tpy). The facility will continue to handle, sort, and transfer municipal solid waste (MSW) and construction and demolition (C&D) debris. The proposed increase in tonnage does not require any new or expanded buildings, changes to the exterior of the property, or changes in operations procedures; however, more waste will be delivered to the site by a larger number of trucks and removed from the site by more train cars and trucks. The facility will continue to operate six days a week (Monday through Saturday). The existing facility was reviewed by MEPA when it was originally proposed for construction in an ENF submitted in August 2018 (EEA#15868). A Certificate was issued on the ENF on September 7, 2018 and did not require preparation of an EIR. The general operations of the existing facility will not change from what was described in the 2018 ENF.

The existing transfer station consists of a 33,600-square foot (sf) building with 32,400-sf of waste handling space and 1,260 sf of office space; a scale house and two scales; a rail yard; parking areas for employees; internal site drives; and a stormwater management system. Trucks delivering waste to the facility will continue to use the same circulation pattern as is currently in use. Trucks enter the site from Tanzio Road and proceed in a counter-clockwise direction through the site. Trucks drive across the inbound scale to be weighed; then proceed to a paved tarmac area where they can back up into the building through one of three off-loading doorways; deposit waste onto the tipping floor; exit the building through the same doorway; drive around the building to be weighed again on the outbound scale; then exit the site through the same driveway on Tanzio Road.

All solid waste handling will continue to be handled within the fully-enclosed building. Solid waste deposited on the tipping floor is inspected for unacceptable materials, such as waste ban materials or hazardous waste. Any recyclable C&D material will be sorted/handled on-site with the existing sorting line and transported by truck to an off-site facility or consolidated for off-site shipment to another MassDEP-approved C&D processor. Acceptable waste is either pushed by a front-end loader or excavator to a waste staging area in the southwestern portion of the building or consolidated in the waste tipping area and pushed to an outbound loading area located along the western portion of the interior of the building. Non-recyclable waste is then loaded onto a rail car parked within a rail loading bay in the west side of the building. All non-recyclable waste will be transported off-site by rail. Once fully loaded and covered, rail cars are pulled out of the building by a rail car pusher, rather than a locomotive, onto railroad tracks along the west side of the site and stored there until picked up by a train for off-site disposal. Rail cars are typically picked up three times per week under existing conditions, and a fourth weekly pickup is anticipated to be added to accommodate the additional waste. As detailed below, the facility employs the Best Management Practices (BMPs) listed below to minimize potential impacts to the environment and avoid nuisance conditions which would constitute harm to public health and safety.

Project Site

The 13.46-acre project site is located on the west side of Tanzio Road in an industrial area in southeastern Leominster. The majority of the site has been disturbed and cleared of large trees. It is covered in brush and shrub vegetation with an unpaved road through the site. The site is bordered to the west by a CSX rail line; to the north by Fall Brook, an electrical transmission line and vacant properties; to the east by Tanzio Road and an active sand and gravel facility; and to the south by an undeveloped area with wetlands and woods. Tanzio Road is located off Route 117 (New Lancaster Road), which provides vehicular access to Interstate-190 (I-190) approximately 1.5 miles south of the site. Approximately 3.69 acres of the site are impervious; no new impervious area is proposed.

The existing transfer station, on-site roadways, and other ancillary structures are located in a level part of the site which generally ranges in elevation from 366 ft NAVD 88 to 372 ft NAVD 88. A small area in the northernmost part of the project site, in which no activities are proposed, is within the Outer Riparian Zone of the Riverfront Area associated with Fall Brook.

An unnamed perennial stream (a tributary of Fall Brook) and associated Bordering Vegetated Wetlands (BVW), Bordering Land Subject to Flooding (BLSF) and Riverfront Area are located in the southern portion of the site. As shown on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) number 250314007B, effective date September 16, 1982, the 100-year floodplain associated with Fall Brook north of the site has a Base Flood Elevation (BFE) of 344 ft NAVD 88 and the 100-year floodplain associated with the stream in the southern part of the site has a BFE of 350 ft NAVD 88. As mapped on the FIRM, the 500-year floodplain is confined to the area immediately adjacent to Fall Brook and the unnamed tributary and does not extend onto any part of the site where transfer station operations will take place.

The project site is located within an Environmental Justice (EJ) population designated as Minority, and within one mile of eight additional EJ populations in Leominster, including two designated as Minority, five designated as Minority and Income, and one designated as Minority, Income, and English Isolation. The project site is located within five miles of 25 additional EJ populations designated as Minority; Minority and Income; Minority and English Isolation; and Minority, Income, and English Isolation located in Leominster, Fitchburg, Lancaster, and Shirley. The DEIR identifies the Designated Geographic Area (or DGA) for the project as 1 mile.

Environmental Impacts and Mitigation

The DEIR provided updated trip generation estimates for the facility under existing conditions and with the proposed increase in capacity from 1,000 tpd to 1,500 tpd.[1] Under existing conditions, the facility generates 48 employee auto trips and 216 truck trips per day, including 214 truck trips for delivery of waste to the site and 2 truck trips for off-site transport of waste after handling at the site. The project will generate up to 106 New truck trips per day transport of waste to the site.[2] Under proposed conditions, the facility will generate up to 370 daily trips, including 48 employees trips (no increase because the number of employees will not change), 320 daily trips by trucks delivering waste to the site (160 loaded trucks in and 160 empty trucks out), and 2 daily trips associated with of-site transport of recycled material.[3] As detailed below, the increase in vehicle trips will cause higher air emissions. The increase in capacity has the potential to cause additional odor and noise impacts.

Measures to avoid, minimize, and mitigate environmental impacts include continued use of Best Management Practices to minimize noise, odor, and air emissions associated with operation of the facility. Final mitigation measures should be identified in the FEIR, including measures to minimize and mitigate off-site impacts in EJ populations associated with project-generated trucks and train traffic and other operations of the facility.

[1] Trip generation estimates have been updated since the filing of the ENF.
[2] As detailed below, the Proponent calculated that 128 truck trips associated with transporting waste off-site hypothetically could be needed to support the proposed increase in capacity; however, this was analyzed only as a worst-case scenario for traffic and air quality analysis as the project will continue the use of rail for off-site transport of waste. The continued use of rail will eliminate the need for these 128 truck trips for off-site transport of waste.
[3] In the absence of the proposed off-site transport by rail, the project could generate up to 128 additional truck trips per day transporting waste off-site (64 empty trucks in and 64 loaded trucks out) for a total trip generation from the site (including existing trips) of 498 trips.

Jurisdiction and Permitting

This project is subject to MEPA review because it requires Agency Action and exceeds the ENF threshold at 301 CMR 11.03(9)(b)(1), New Capacity or Expansion in Capacity for combustion or disposal of any quantity of solid waste, or storage, treatment or processing of 50 or more tpd of solid waste, unless the Project is exempt from site assignment requirements. The project is required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a Designated Geographic Area (or DGA) (as defined in 301 CMR 11.02) around one or more EJ populations. The project requires a Modification of a Large Handling Facility (BWP SW 07) permit from the Massachusetts Department of Environmental Protection (MassDEP). The project requires a Minor Modification to an Existing Solid Waste Site Assignment from the Leominster Board of Health.

Because the project is not seeking Financial Assistance from an Agency, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of any required or potentially required Agency Actions and that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the DEIR

The DEIR was generally responsive to the Scope included in the ENF Certificate. It included updated transportation, air quality, noise, and odor analyses, draft Section 61 Findings, and responses to comments received on the ENF. According to the DEIR, there have been no changes to the project design since the ENF was filed.

Alternatives Analysis

According to the DEIR, the project is proposed to meet increasing demand for MSW and C&D waste disposal in Massachusetts. As previously noted in its comments on the ENF, MassDEP acknowledges that solid waste transfer facilities are necessary to divert and dispose of waste to conserve the state's declining landfill capacity. As required by the ENF Certificate, the DEIR included an expanded alternatives analysis that reviewed alternative sites (in addition to the alternative site evaluated in the ENF) for a new or expanded transfer facility, and evaluated alternative ways of operating the facility at the proposed location to further minimize traffic, odor and noise impacts.

The DEIR also summarized the No Build Alternative previously included in the ENF, which would maintain the facility's existing capacity of 1,000 tpd. According to the DEIR, because of the regional demand for waste management and the lack of landfill capacity, exportation of waste will be the primary method of waste disposal in the state. Therefore, the volume of waste material exceeding the existing 1,000 tpy capacity, if not handled at this facility, would have to be transported to other transfer stations at potentially greater distances, resulting in greater air emissions, particularly if rail were not available for transportation of waste at the alternate location. In addition, the state's overall waste disposal, processing, and recycling capacity would continue to decline. For these reasons, the No Build Alternative is not a feasible alternative.

Alternative Locations

The DEIR evaluated the siting alternatives listed below.

1. Expansion of the Proponent's existing Millbury facility (reviewed in the ENF)
2. Construction of a new transfer facility at a different location in Leominster
3. Expansion of the transfer station operated by another entity (Waste Management) at 256 Lancaster Road in Leominster
4. Expansion of the Proponent's existing transfer station in Fitchburg
5. Development of a new facility in the vicinity of Leominster but outside of an EJ area
6. Expansion of the Proponent's existing Leominster facility (Preferred Alternative)

Expansion of the Millbury facility (Alternative 1) involves increasing its capacity by 500 tpd, from 1,000 tpd to 1,500 tpd. This alternative was previously reviewed in the ENF for this project. The Millbury facility is not served by rail, and therefore all material would be transported to and from the site by trucks, which, according to the Proponent, is four times less efficient in terms of fuel use than rail transport. Furthermore, the Millbury facility is farther away from the sources that would otherwise dispose of waste in Leominster, and would therefore generate greater air emissions from truck delivery of waste to the site. The Millbury facility is located adjacent to, but not within an EJ population; however, trucks delivering waste material to and from the site would pass through an EJ population. The Town of Millbury exceeds 110% of the statewide average rate of heart attack hospitalizations; however, no other vulnerable EJ health criteria are met or exceeded in Millbury or the census tracts within 1 mile of that site. The nearest residences are over 650 ft away from the facility (further away than the nearest residences to the Leominster facility). According to the DEIR, Alternative 1 (expansion of the Milbury facility) was not pursued because of the greater distances that trucks would need to travel and the lack of rail service.

Alternative 2 includes construction of a new facility at a 7.61-acre site (parcel 320-1E) in Leominster that was previously operated as a sand and gravel pit but is now vacant. This site is located on Tanzio Road across the street from the Proponent's existing Leominster facility at which the capacity is proposed to be expanded in the Preferred Alternative. The Alternative 2 site is similar to the Preferred Alternative site in that it is zoned for industrial use and is a previously disturbed site of adequate size. Alternative 2 has good truck access to regional highways; however, there is no direct access to rail and a new rail spur would have to be constructed to the railroad tracks, which are located over 700 feet away. The site is located within the same EJ population, and within one mile of the same eight additional EJ populations, as the Preferred Alternative. The City of Leominster exceeds 110% of the statewide average rate of heart attack hospitalizations; however, no other vulnerable EJ health criteria are met or exceeded in Leominster or the census tracts within 1 mile of the site. This alternative is infeasible because it is even closer to residences than the Preferred Alternative site is and the site's irregular shape would make it impossible to provide the required 500-ft setbacks to residences. In addition, selection of Alternative 2 requires extensive filling of the existing sand and gravel pit, which would generate greater impacts, including truck trips, during the construction period.

Alternative 3 involves an increase in the capacity of an existing transfer station owned and operated by another entity (Waste Management) on a 6.68-acre parcel at 256 New Lancaster Road in Leominster (approximately 1.2 miles south of the Preferred Alternative site). The Waste Management facility has a permitted capacity of 650 tpd of MSW only, and therefore could not accept C&D material without a modified site assignment. The nearest residence to the facility is approximately 600 ft away; however, due to the proximity of the site to the nearest I-190 ramps, trucks using the highway would not have to pass through residential neighborhoods to access the site. According to the DEIR, increasing the capacity of this facility would require an expansion of the existing 20,000-sf building to at least 30,000 sf; however, it appears that in order to maintain property line setback requirements, the building would have to be expanded in an L-shaped configuration, which does not allow for proper truck traffic flow in front of the tipping doors. Because the site does not have rail access, an increase in the capacity of the facility would generate a greater number of truck trips than the Preferred Alternative. The Waste Management facility is located in an EJ population and within one mile of four additional EJ populations, including three in Leominster and one in Lancaster. The City of Leominster and Town of Lancaster both exceed 110% of the statewide average rate of heart attack hospitalizations; however, no other vulnerable EJ health criteria are met or exceeded at the community or census tract levels within 1 mile of that site. The facility is privately owned and would have to be purchased by the Proponent. As noted above, an expansion of the building to accommodate an additional 500 tpd does not appear to be possible without compromising truck routing through the site, and a site assignment modification would be required in order for the facility to accept C&D material. For these reasons, and particularly the greater truck trips associated with this option, this alternative was not selected.

Alternative 4 includes expansion of the Proponent's existing transfer station at 15 Cobbler Drive in Fitchburg, which is the solid waste facility operated by the Proponent nearest to the Preferred Alternative location. The site consists of three non-contiguous parcels, of which only one 3.1-acre parcel is site assigned and permitted to accept 500 tpd, including 250 tpd of MSW and 250 tpd of C&D. The closest residential property is located approximately 1,800 ft away. The site is zoned residential and the truck route between the site and Route 2 passes through a largely industrial area with few residences. To increase the capacity of the facility, the existing building would have to be expanded; however, due to the small size of the site assigned parcel, the adjacent property would have to be purchased, site assigned, and developed for waste handling. The Alternative 4 site is located within an EJ population and within one mile of eleven additional EJ populations, including seven located in Leominster and four located in Fitchburg. The City of Fitchburg exceeds 110% of the statewide average rate of heart attack hospitalizations, low birth weight, blood lead levels, and pediatric asthma, and three census tracts within 1 mile of the site meet the criteria for low birth weight; as noted above, the City of Leominster exceeds 110% of the statewide average rate of heart attack hospitalizations. Alternative 4 was not selected due to the need to acquire the adjacent parcel, expand the existing building, and complete the site assignment approval process for the adjacent parcel. In addition, the site does not have rail access; therefore, the use of this site would generate more new truck trips than the Preferred Alternative.

Alternative 5 involves construction of a new transfer station at a 24-acre site adjacent to an existing landfill in Sterling. According to the DEIR, this location is the closest industrially-

zoned site to the Preferred Alternative site that is not located in or within one mile of an EJ population. The site is owned by the Town of Sterling and used by its Public Works Department. It is located close to Route 12 and to ramps providing access between the site and I-190. The nearest residential building is approximately 700 ft away; however, it is located on the truck route between the site and Rt 12 and I-190. Despite the site's location next to a landfill, it is located within a Zone II drinking water protection area; therefore, the site does not meet site suitability criteria. In addition to the unavailability of the site due to its ownership and use by the Town of Sterling, the site does not have rail access. For all of these reasons, this site was not selected.

As described above, the Preferred Alternative will minimize impacts by increasing the permitted capacity of the existing transfer station, which can accept additional waste without any structural or operational modifications to the site. According to the DEIR, the facility has ample interior accessways to provide adequate truck queuing space; uses two scales to assist with traffic flow and to minimize delays; has an adequate number of doors to handle the proposed increase; and has sufficient interior space to stockpile and temporarily store additional MSW and C&D waste. According to MassDEP, the processing /sorting line operates at a general capacity of 30 tons per hour and averages 198 tons of C&D per day, which is well below the current processing line capacity and feasibly allows for the proposed increase in capacity.

Environmental Justice

As noted above, the project site is located within an EJ Population designated as Minority and within one mile of eight additional EJ populations, including two designated as Minority, five designated as Minority and Income, and one designated as Minority, Income, and English Isolation. Within the census tracts containing the above EJ Populations within one mile of the project site, Spanish and Spanish Creole were identified as spoken by 5% or more of residents who also identify as not speaking English very well. The DGA is identified as 1 mile.

Public Engagement

The DEIR described public involvement activities conducted after the ENF certificate was issued. The Proponent held a public meeting at 6:00 PM on Tuesday, June 24, 2025 at the Franco American War Veterans facility in Leominster. Notice of the meeting was distributed to the EJ Reference List by email on June 11, 2025, and published in local newspapers and posted at City Hall and the Leominster Public Library in English and Spanish. The meeting notice was provided to the City, the Spanish American Center, and posted on the project website (www.ummleominster.com) in both Spanish and English. The Proponent offered interpretation services by request; however, no requests for interpretation services were received. A recording of the June 24, 2025 meeting and the presentation slides used at the meeting are posted on the project website. The meeting was attended by 12 people, including residents, representatives of the City, and MEPA staff. The Proponent provided an overview of the project, its purpose and need, permitting timeline, and reviewed the findings of an updated traffic study completed after the ENF was filed. Questions from meeting attendees focused on existing impacts of the facility, including truck traffic, roadside trash, and railroad operations; in addition, residents inquired about the degree to which truck traffic, noise, and odor will increase if the capacity of the facility changes from 1,000 tpd to 1,500 tpd. The Proponent discussed these issues with meeting

attendees and provided responses either at the meeting or in the DEIR. The DEIR includes a summary of the Proponent's responses to the concerns raised as shown below.

- The increase in tonnage will be implemented gradually, and is expected to vary over the year, with most additional tonnage expected to be C&D material delivered during peak construction seasons (typically May/June and September/October).
- The Proponent noted that under the current permitted maximum of 1,000 tpd, the facility received between 900 and 1,000 tons of waste on only eight days in 2024 and only 16 days in 2023. The Proponent expects that if the capacity is permitted to increase to 1,500 tpd, that maximum capacity will similarly be reached on only a few days each year.
- The Proponent does not currently plan to seek out a larger client base with the expansion. The expansion will serve existing clients and will minimize the number of times the facility has to turn away residents and clients due to capacity issues during the busy seasons.
- The facility's hours of operation are not proposed to be changed and will not be extended to accept additional waste.
- An updated traffic study was conducted and presented in the DEIR to confirm the number of truck trips and the trip distribution, including routes taken by packer trucks collecting curbside trash in the City and delivering waste to the facility.
- The Proponent anticipates one additional switch (rail service) per week to accommodate the additional tonnage (52 rail cars to 72 rail cars per week).
- The Proponent reviewed the facility's existing odor mitigation measures, including fans equipped with filters, a misting system with odor counteractants is used indoors, and rail cars are covered with a spray foam that seals the car.
- In response to a comment about litter on Lancaster Street, the Proponent noted that not all trash deposited along Lancaster Street may come from trucks delivering waste to the project site because trucks from other waste companies also use Lancaster Street. The Proponent will continue to monitor trucks delivering waste to the site to ensure the use of tarps to cover waste.
- In response to comments about trash, including nails and screws, along Tanzio Road, the Proponent committed to add magnets to the street sweeper so that it picks up metallic debris; according to the DEIR, this was implemented starting in December 2024
- The Proponent reviewed its procedures for receiving, investigating, and responding to complaints
- The Proponent offered to provide contact information for the CSX railroad company to City officials to help establish a dialogue about the railroad crossing on Litchfield Street
- The Proponent offered to provide residents with a guided tour of the site (according to the DEIR, no tours were requested)

Prior to filing the DEIR, the Proponent obtained an updated list of community-based organizations (CBOs) and tribes/indigenous organizations which the Proponent used to update its project-specific the "EJ Reference List." The updated EJ Reference List also included commenters on the ENF. A link to the DEIR was submitted by email to the EJ Reference List when the DEIR was submitted to the MEPA Office.

The DEIR includes an updated Public Involvement Plan (PIP) that describes measures the Proponent intends to undertake to promote public involvement by the identified EJ populations during the remainder of the MEPA review process, including a discussion of any of the best practices listed in the MEPA EJ Public Involvement Protocol that the project intends to employ. Public engagement measures identified in the PIP include:

- A project website (www.ummleominster.com) has been established to serve as a single-source of information and communication platform in Spanish and English, including project summaries, fact sheets, public meeting recordings, and past MEPA filings
- Notices of upcoming public informational meetings and public hearings will be provided in Spanish and English and posted on the project website; physically posted at City Hall, Leominster Public Library, and Spanish American Center; published in local newspapers (in English to the Sentinel and in Spanish to the Vocero); and distributed via email to the EJ Reference List and abutters
- Notification of meetings and public hearings will be provided two weeks in advance, and no less than three days in advance in accordance with Open Meeting Law requirements
- Spanish translators will be provided at all public meetings upon request
- Public meetings will be scheduled during evening hours at accessible locations near public transportation, as feasible
- The Proponent will specifically engage with representatives of the Spanish American Center, the Mayor and City agencies, and other elected officials at key project milestones
- A virtual tour video of facility will be provided on the project website with Spanish translation
- The project distribution list will be updated regularly

Prior to filing the FEIR, the Proponent should take steps to directly engage with those community members who commented on the DEIR. If requested by the community, the Proponent should host another public meeting prior to filing the FEIR. I also encourage the Proponent to consider creative engagement strategies by organizing meetings with pre-existing groups (e.g., grassroots organizations, neighborhood associations, etc.) or organizing in natural areas of congregation (e.g., within places of worship, libraries, and community events).

Baseline Assessment

The DEIR contained a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations in accordance with 301 CMR 11.07(6)(n)1. and the MEPA Interim Protocol for Analysis of EJ Impacts. According to the DEIR, the data surveyed show some indication of an existing "unfair or inequitable" burden impacting the identified EJ Populations based on an evaluation of four environmentally related health indicators that are measured to be 110% above statewide rates based on a five-year rolling average.[4] Specifically, the City of Leominster meets the vulnerable

[4] See https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html. Four vulnerable health EJ criteria are tracked at the municipal level in the DPH EJ Viewer (heart attack hospitalization, childhood asthma, childhood blood lead, and low birth weight); of these, two (childhood blood lead and low birth weight) are also available at the census tract level.

health EJ criteria for heart attack hospitalizations; however, no criteria are met in any of the census tracts in the DGA.

According to the DEIR, the following sources of potential pollution exist within the one-mile DGA, based on the mapping layers available in the DPH EJ Tool:

- Major air and waste facilities: 5
- M.G.L. c. 21E sites: 3
- "Tier II" toxics use reporting facilities: 9
- MassDEP sites with AULs: 1
- Underground storage tanks: 3
- EPA facilities: 3
- Road infrastructure: 3
- Regional transit agencies: two bus stops operated by the Montachusett Regional Transit Authority
- Other transportation infrastructure: 3 railways
- Energy generation and supply: 6 power transmission lines

According to the output report from the Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool") previously included in the ENF, the project site has a High exposure to riverine flooding due to extreme precipitation and a Moderate exposure to extreme heat and to stormwater flooding due to extreme precipitation. EJ populations near the site are likely also exposed to these climate risks.

As required by the Scope included in the ENF Certificate, the DEIR reviewed air quality related indicators in EPA's EJ Screen[5] that are elevated at or above the 80th percentile of statewide average for each EJ census block within the 1-mile DGA (not aggregated across the entire 1-mile radius) and as appropriate, along anticipated truck routes outside the 1-mile DGA. According to the EJ Screen data, no census blocks exceed the 80th percentile for most air quality related environmental indicators within one mile or five miles of the project site; however, the indicator for nitrogen dioxide (NO_2) was exceeded within the DGA (based on the "Environmental Justice" (EJ) index").[6] In addition, the Lead Paint indicator exceeded the 80th percentile level in two census blocks within the DGA, based on both the EJ index and environmental indicator index. According to the DEIR, there are no other facilities (other than this project site) within one mile of the site that operate under MassDEP air or solid waste permits; the closest such facilities are over five miles from the project site.

[5] Note that as of February 2025, the EJ Screen tool is no longer available on EPA's website. The Proponent utilized a reproduced version of EJ Screen at an alternative site (https://pedp-ejscreen.azurewebsites.net/).
[6] The DEIR summarized Environmental Justice Indexes data provided in the EJ Screen tool, rather than Environmental Burden Indicators data as required in the Scope. While the percentiles do not greatly differ between the two datasets in the vicinity of the DGA, the EJ Index for nitrogen dioxide exceeded the 80th percentile, whereas the environmental indicator was below the 80th percentile.

Project Impacts

As previously noted in the ENF Certificate and summarized above, commenters have identified a number of impacts along transportation routes used by project-generated trucks and trains, including noise early in the morning and late at night; queuing of trucks along Lancaster Street and New Lancaster Road; use of Malburn Street, which is a residential street from which through trucks are prohibited, by trucks delivering waste to the facility; odor complaints; scattering of trash from trucks that are not adequately covered; rodents along transportation routes; and traffic disruptions associated with the at-grade train crossing on Litchfield Street. In addition, the DEIR reviewed the 11 unique complaints received by the City and/or MassDEP between April 7, 2021 and March 18, 2025. According to the DEIR, six of the complaints were related to odor, and were all attributed to the same residence; two of the complaints concerned operation of the facility (specifically related to a bay door left open); one concerned noise and dust; one concerned the presence of rodents along the railroad tracks; and one concerned trash along the railroad tracks. According to the DEIR, the Proponent has implemented the following measures to address the truck traffic, noise, trash, and rodent issues:

- The trucks that were parked on Lancaster Road prior to facility opening were identified and warnings issued to the companies that if activity continues, they will not be allowed to use the facility
- All customers have been reminded of the facility's hours of operation and that no early arrivals or idling/queuing anywhere outside of the site is allowed
- All customers have been reminded that trucks are prohibited on Malburn Street. The Proponent will work with the City to install a "No Thru Trucks" sign on Malburn Street near the Lancaster Street intersection
- The Proponent is investigating the feasibility of implementing sound dampening measures on ventilation fans to determine if such measures would reduce noise impacts; alternatively, the feasibility of replacing current fans with low noise fans that can achieve the same exhaust flow rates will be investigated
- One of three doors will remain closed after 4:00 PM to minimize noise impacts
- In response to complaints about traffic backups due to the at-grade CSX train crossings, the Proponent has facilitated direct conversation between the City and CSX by providing the City with contact information for CSX
- The Proponent uses a pest management company to control rats, which includes bait stations and monthly inspections. In addition, good housekeeping measures will continue to be employed, including first-in, first-out procedures[7] to minimize attractants and building maintenance to minimize access to material by rodents.
- Additional information about noise, including noise generated by trains picking up loaded rail cars from the site, is discussed further in the Noise section below
- Responses to odor complaints are discussed further in the Odor section below

The DEIR included an analysis of potential impacts on EJ populations of air emissions from project-generated trucks. As required in the ENF Certificate Scope, the DEIR utilized

[7] "First in- first out" practices ensure that waste is removed from the tipping floor in the order it was received to minimize the length of time that the waste is on site and potentially contributing odors

Massachusetts Department of Environmental Protection (MassDEP) Cumulative Impact Analysis (CIA) methods[8] to analyze asthma prevalence at a finer scale via pediatric asthma prevalence for kindergarten through eighth grade (K-8) schools along truck routes in the DGA. Only one school reporting pediatric asthma data is located within the DGA. The school reports an asthma prevalence lower than the state average (87% of MA average) and is located nearly a mile north of the site in the opposite direction of the facility's main truck route (proceeding south of the site, towards Route I-190). Moreover, as detailed in the Air Quality section, the increase in facility capacity will generate minimal emissions of air contaminants.

As directed in the ENF Certificate, the Proponent evaluated the feasibility of implementing additional air quality mitigation measures such as tree planting, highway barriers, limiting hours of operations, installing air filters on nearby residential dwellings, and battery electric charging for trucks. The Proponent committed to additional tree plantings to increase the existing and maturing vegetative buffer between the site and neighboring uses, mitigating air emissions and reducing noise pollution from the facility. While the DEIR states that limiting hours of operations is infeasible and may actually result in truck redirection through residential roads, the Proponent is committed to enforcement of current operation hours by issuing warnings to customers regarding no early arrivals idling/queuing outside of the facility. The DEIR states that battery electric charging for trucks would require regional infrastructure changes to support the shift of future truck fleets from diesel to electric. Finally, according to the DEIR, installing air filters on nearby residences is not a feasible option depending on the age and design of residential dwellings and will be cost prohibitive. I note that portable air purifiers are generally considered a cost-effective mitigation option that can provide measurable reductions in indoor particulate concentrations regardless of building age or design.

Public Health

The DEIR reviewed publicly available data, including through the DPH EJ Tool, to assess the public health conditions in the immediate vicinity of the project site, identify any project impacts that could materially exacerbate such conditions. As noted above, heart attack hospitalization is the only vulnerable health criterion that is met within the DGA (at the community level).

The DEIR reviewed MassDEP air monitoring data for the three-year period from 2021 to 2023 collected at sampling stations in Worcester. Concentrations of all contaminants are below the National Ambient Air Quality Standards (NAAQS); however, average annual background concentrations of $PM_{2.5}$ were measured as 8.2 micrograms per cubic meter, which is 91.5% of the NAAQS (9 micrograms per cubic meter). While the project will result in a modest increase in annual $PM_{2.5}$ emissions (estimated at 0.0001 tons per year), the NAAQS is determined by health-based exposure thresholds and given background concentrations already approach this limit, even relatively minor project contribution warrant consideration to ensure continued protection of sensitive populations.

[8] MassDEP recently finalized regulations related to a CIA framework for certain air permits. The regulations and associated guidance are available here: https://www.mass.gov/info-details/cumulative-impact-analysis-in-air-quality-permitting.

As discussed in the Air Quality section below, air pollutant emissions are anticipated to decrease under 2032 Build conditions compared to existing conditions (primarily due to more stringent EPA diesel vehicle emission standards). This provides some assurance that future background $PM_{2.5}$ concentrations may decrease compared to 2021-2023 $PM_{2.5}$ concentrations, further decreasing below the NAAQS. Nonetheless, I encourage the proponent to continue to identify and implement feasible mitigation measures to minimize cumulative air quality impacts and protect the environmental justice communities within which they operate. The FEIR should also confirm that improvements in background conditions would also occur for truck traffic, given the delayed implementation of federal clean truck mandates.

In addition to mobile-source air emissions from project generated truck trips, the project may also exacerbate existing community odor and noise concern. The project includes measures to minimize and mitigate odor and noise generated by the project, as discussed elsewhere in this certificate, so that the facility complies with the MassDEP Noise Policy and avoids nuisance odor conditions.

Solid Waste Management

The project will increase the solid waste transfer capacity of the existing facility by 500 tpd (from 1,000 tpd to 1,500 tpd). Because the entire site is already site assigned, the project requires a minor modification to the Site Assignment from the Leominster Board of Health. The project also requires a Modification of a Large Handling Facility permit from MassDEP, which will be reviewed after the Board of Health's decision on the Site Assignment modification. In the ENF, the Proponent provided a Draft Site Suitability Report that outlined each of the siting criteria per 310 CMR 16.00 (Site Assignment for Solid Waste Facilities regulations) that the project must meet in order to receive a Site Assignment modification. The siting criteria are intended to minimize conditions through which operation of a solid waste facility would constitute a danger to the public health, safety or the environment by establishing restricted areas and minimum setbacks from sensitive receptors such as residences and schools and from natural resources such as water supplies, open space, habitat, and wetlands, and by requiring facilities to operate in a manner that avoids nuisance conditions which would constitute a danger to the public health, safety or the environment.

The facility is permitted to operate from 6:00 AM to 7:00 PM on weekdays and from 7:00 AM to 3:00 PM on Saturdays; however, the facility has posted delivery hours for third-party clients from 6:30 AM to 3:30 PM on weekdays and from 7:00 AM to 11:30 AM on Saturday. The FEIR should clarify the activities conducted by the Proponent within these time periods and the anticipated operating hours and waste acceptance hours under future permits. According to the DEIR, the existing facility can accommodate the proposed tonnage increase because the site has adequate space for truck circulation and queuing; the three tipping doors can accommodate the anticipated rate of deliveries; the tipping floor has adequate space to accept and store additional waste; and the processing/sorting line has the capacity for an additional 20 tons per hour (for a total of 50 tons per hour including the 30 tons per hour currently processed). The facility's permitted maximum overnight storage limit, which the Proponent will continue to adhere to, is a total of up to 2,035 tons, including 375 tons of unprocessed C&D, 1,000 tons of C&D residuals and bulky waste (combined), 600 tons of MSW, and 60 cubic yards of rejected

materials. According to the DEIR, the building has enough space to accommodate up to 2,200 tons of C&D residuals or MSW in the tipping and loadout areas and up to 800 additional tons of C&D in other locations within the building for a total of up to 3,000 tons of overnight storage which equates to two days of full inbound capacity. The FEIR should confirm the tonnage limits that will be requested for each type of waste on a daily basis and for overnight storage. The FEIR should provide an estimate of the remaining capacity of the facility after the daily tonnage is increased to 1,500 tons.

Noise

The Proponent previously provided in the ENF a sound study which analyzed noise impacts associated with operation of the facility under proposed conditions. The analysis modeled sound levels at 22 residential receptors surrounding the facility. Sources of noise evaluated in the study included excavators and loaders used to move waste in the building; idling trucks inside and outside the building; recycling equipment in the building; ventilation fans; trucks entering and leaving the site; rail car moves; street sweepers, and compactors. The analysis determined that predicted noise levels at all modeled receptors, were no more than 10 decibels (dbA) higher than ambient sound levels, which complies with MassDEP's Noise Policy. The noise analysis in the ENF assumed that the facility would operate with the following noise mitigation measures:

- The tipping doors are oriented away from the nearest residential receptors
- Tipping hours will continue to be limited to the period from 6:30 AM to 4:00 PM
- Handling and processing materials would take place only inside the building
- Outside rail car mover activity will continue to be limited to operational hours and will not occur before 6:00 AM.
- Trucks with tailgates will continue to be required to remain inside the building until the tailgates are closed to reduce noise associated with tipping, unless trucks are otherwise equipped with seals or gaskets.
- Operation of equipment outside the building will not be permitted prior to 6:00 AM on weekdays and 7:00 AM on Saturday, or after 7:00 PM on weekdays and 3:00 PM on Saturday.
- Equipment will be operated at normal and reduced speeds to minimize sound levels.
- Ventilation fans and motors are located inside the building to reduce sound impacts.
- Use of rollup doors at tipping floor and rail loadout bay outside of peak operating hours to contain sound from within the building.
- On-site storage of spare rollup door parts to minimize potential time a door is inoperable if damaged.
- Provide regular communications with haulers/clients regarding truck routes, hours of operation, and consequences of arriving early or not following traffic routes.
- Trucks will adhere to anti-idling laws.

Comments received on the ENF raised concerns about potential increased noise levels if the capacity of the facility is permitted to accept more waste. Commenters specifically identified noise generated by increased train and truck activity, and ventilation fans. According to the DEIR, a significant increase in noise is not expected from trains hauling waste from the site

because the frequency of train service will increase from three times per week to four times per week under proposed conditions, and each pick up lasts only about 20 to 30 minutes. Similarly, the noise generated by trucks is not anticipated to increase significantly because project-generated truck traffic is a small portion of the overall vehicular traffic on area's roadways. According to the DEIR, the sound analysis included in the ENF documented that the project will have minimal off-site noise impacts, and noted that other nearby buildings have large ventilation systems that may be contributing noise to the area. In response to comments related to the project's noise impacts, the Proponent has committed to implement the following additional mitigation measures that were not previously described in the ENF:

- As noted above, the trucks that were parking on Lancaster Road prior to facility opening were identified and warnings issued to the companies that if activity continues, they will not be allowed to use the facility
- All customers have been reminded of the facility's hours of operation and that no early arrivals or idling/queuing anywhere outside of site, outside of designated truck stop locations, is allowed
- The Proponent is investigating the feasibility of implementing sound dampening measures on ventilation fans to determine if such measures would reduce noise impacts; alternatively, the feasibility of replacing current fans with low noise fans that can achieve the same exhaust flow rates will be investigated
- One of three doors will remain closed after 4:00 PM to reduce sound impacts

Odor

An odor analysis was previously provided in the ENF. Potential odor impacts were modeled using the AEROMOD dispersion model to assess a worse-case scenario in which all the doors of the facility would be open at all times and that all the waste at the site is MSW (which is a greater source of odor than C&D); however, in practice, the doors are closed except to allow trucks to enter and exit, and the facility receives more C&D material than MSW (and will continue to do so under proposed conditions). The analysis modeled a scenario where 150 tons of MSW were left on the tipping floor overnight, which reflects the typical volume of MSW stored overnight; and a scenario where 600 tons of MSW (the maximum permitted volume of MSW that can be stored overnight) were left on the tipping floor overnight. The analysis determined that under the 600-ton scenario, the intensity of odor required the addition of an odor counteractant to the existing water misting system and exhaust filters on the exhaust fans. The facility is permitted to store 600 tons of MSW overnight; however, the Proponent typically stores closer to 150 tons of MSW overnight to minimize odors and to ensure adequate floor space for overnight storage of C&D material. According to the DEIR, the Proponent is not seeking to increase the permitted maximum volume of MSW to be stored overnight (600 tons) and does not expect that the typical volume of MSW stored overnight will increase significantly above 150 tons in connection with the proposed increase in capacity.

The DEIR summarized the results of a supplemental odor analysis that included loaded railcars as an odor source; according to the DEIR, loaded railcars were excluded from the prior analysis because they are not significant contributors to total site odors. The supplemental odor analysis concluded that the odor produced by MSW in a railcar would be confined to an area of

10 feet around the railcar and would dissipate quickly due to the low emission rate. The DEIR provided only a summary of the supplemental odor analysis and did not specify the modeling assumptions or methods; this should be provided in the FEIR.

As noted above, the DEIR included a review of the six odor complaints that were received by the Leominster Board of Health or MassDEP from 2021 to 2025. For each complaint, the DEIR listed the date the complaint was received, the agency to which the complaint was made, a summary of the complaint, and, in cases where the complaint was investigated, a summary of the outcome of the investigation. Observations of wind speed and direction were included for four of the complaints. According to the DEIR, MassDEP and/or the Leominster Board of Health investigated four of the odor complaints. In two cases investigated by the Leominster Board of Health, faint and/or intermittent odors were detected by the investigator; however, according to the DEIR, none of the four complaints were confirmed by the investigating agencies as having nuisance potential. As noted above, all of the complaints were received from the same residence.

The DEIR identified the following best management practices that are used, and will continue to be used, at the facility to control odor generated by MSW:

- Follow first-in, first-out protocols for moving MSW through the facility
- Use odor counteractants in the misting system
- Close overhead doors if an odorous load arrives at the facility
- Handle all MSW, including during loadout activities, inside the handling building.
- Cover the MSW in railcars with a CSX-approved covering, which can include either a lid, posi-shell, or other equivalent (ATMOS). The posi-shell and ATMOS products create a hard waterproof shell that entirely covers the waste within the rail car
- Minimize storage of MSW in the building overnight and over weekends.
- Continue good housekeeping practices

Air Quality

The DEIR included an analysis of potential impacts of air emissions from project-generated trucks through EJ areas along the truck routes. According to the DEIR, the project will generate a total of 234 new daily truck trips, including 106 new trips (53 trucks entering and 53 trucks leaving) associated with delivery of waste to the site, and 128 daily truck trips (64 entering and 64 leaving) that could be generated by the project due to hauling of waste material from the site by trucks; however, according to the DEIR, the 128 truck trips will not be generated because the facility will continue to use rail to transport waste off-site. Therefore, while both the traffic analysis and air quality analysis modeled, as a worst case scenario, a hypothetical increase of 234 new truck trips per day from the project, the actual number of new truck trips is expected to be approximately 106 per day. The FEIR should confirm whether the use of rail in lieu of trucks will be a condition of the revised permit from MassDEP or local Board of Health.

Trucks traveling to and from the site include smaller packer trucks and roll-off trucks that will deliver waste to the site. According to the DEIR, any tractor trailers (up to 128 daily truck trips) will travel directly between the site and I-190 to transport waste off-site. The packer trucks

and roll-off trucks will deliver waste to the site from local sources using local roads in addition to traveling to and from the site using I-190. According to the DEIR, 75% of truck delivering waste to the site will arrive from the south, including 69 truck trips per day (65%) that will use I-190, New Lancaster Road and Tanzio Road and 11 truck trips per day (10%) that will use Willard Street, New Lancaster Road and Tanzio Road. The remaining 25% of truck trips (27 trips per day) will deliver waste from the north using Lancaster Street and Viscoloid Street. All of these road segments are located within EJ populations in the DGA.

The DEIR provided an assessment of the air quality impacts associated with emissions from project-generated trucks using the EPA MOVES4 model and data from the traffic study. The analysis evaluated emissions of Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NOx), Fine Particulate Matter ($PM_{2.5}$), Diesel Particulate Matter (DPM/PM_{10}), and Carbon Dioxide (CO_2) along the truck routes described above. The analysis estimated emissions from trucks in the study area under 2025 Existing, 2032 No Build, and 2032 Build scenarios. According to the analysis, emissions of all contaminants except CO_2 will be lower under 2032 No Build conditions than under 2025 Existing conditions due to general improvements in engine technology and associated reductions in air emissions from truck trips. Under 2032 Build conditions, truck emissions of VOCs, NOx, $PM_{2.5}$ and DPM/PM_{10} will be approximately 5% higher than emissions under 2032 No Build conditions, but still remain lower than under 2025 Existing conditions. The increases associated with the project are modest, and range from an increase of 0.0001 tons per year (tpy) for PM and 0.0026 for NOx. As shown in Table 1, emissions of all pollutants except CO_2 are below 0.01 tpy; emissions of CO_2 are discussed in more detail in the Climate Change section below.

Table 1. Mesoscale Emissions Analysis Results (tons per year)	2025 Existing	2032 No Build	2032 Build	Project-generated emissions
VOCs	0.0046	0.0043	0.0045	0.0002
NOx	0.0668	0.0553	0.0579	0.0026
$PM_{2.5}$	0.0029	0.0019	0.0020	0.0001
DPM/PM_{10}	0.0031	0.0021	0.0022	0.0001
CO_2	26.83	28.43	33.49	5.07

As discussed in the Environmental Justice section above, the Scope included in the ENF certificate required the DEIR to utilize the Massachusetts Department of Environmental Protection (MassDEP) Cumulative Impact Analysis (CIA) methods[9] to analyze asthma prevalence at a finer scale via pediatric asthma prevalence for k-8 schools servicing any EJ neighborhoods along truck routes within the 1-mile DGA. According to the DEIR, there are three schools near the truck routes within the DGA; however, data was available only for the Frances Drake Elementary School, which is located on a section of Viscoloid Avenue identified as a secondary truck route used by 25% of the trucks delivering waste to the site. According to the DEIR, the pediatric asthma prevalence for this school is 10.7% of the students, which is about 87% of (or lower than) the statewide average.

[9] MassDEP recently finalized regulations related to a CIA framework for certain air permits. The regulations and associated guidance are available here: https://www.mass.gov/info-details/cumulative-impact-analysis-in-air-quality-permitting.

According to the DEIR, the project will result in a minimal increase in air pollutants and the project will comply with all applicable health-protective standards, including the National Ambient Air Quality Standards (NAAQS). As noted above, the air quality analysis assumed that all waste will be transported off-site by truck; however, the Proponent will continue to transport nearly all waste from the site using rail, thereby eliminating almost 55% (128 truck trips) of truck trips associated with waste transport to and from the site. The emissions estimates shown above range up to 0.0026 tpy at most (for NOx), and the baseline indicators do show NO_2 (measured as "EJ index") as exceeding 80th percentile of state rates. However, as noted in the DEIR, all modeled emissions are likely approximately double the actual emissions from project-generated truck trips due to the use of rail. According to the DEIR, other means of reducing emissions from trucks, such as the use of EV trucks, would require a significant change in the existing and future truck fleet and infrastructure that is not yet available for use. In addition, implementation of Transportation Demand Management (TDM) measures is not feasible for waste delivery trucks, which come at variable frequency and locations. According to the DEIR, the Proponent will comply with any additional diesel vehicle emissions standards adopted by MassDEP, including California's Advanced Clean Trucks standards.

Traffic and Transportation

The DEIR included an updated transportation study generally consistent with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014 which analyzed the impacts of the increased traffic generated by the project. The analysis incorporated the following conditions that were not included in the traffic study included in the ENF:

- Employee vehicle trips and updated truck trip generation estimates under proposed conditions
- Evaluation of traffic operations at an additional intersection (Lancaster Street at Viscoloid Avenue) based on comments by residents that waste trucks pass through this intersection
- Routes used by local packer trucks delivering waste to the site

The TIA analyzed the transportation impacts of the project in a study area including the following intersections:

- New Lancaster Road (Route 117) at Willard Street
- Lancaster Street (Route 117) at Tanzio Roa
- Tanzio Road at Site Driveway
- Lancaster Street at Viscoloid Avenue

According to the DEIR, the facility is permitted to operate from 6:00 AM to 7:00 PM on weekdays and 7:00 AM to 3:00 PM on Saturday; however, posted delivery hours at the facility (for third-party clients) are from 6:30 AM to 3:30 PM on weekdays and 7:00 AM to 11:30 PM on Saturday.

Under existing conditions, up to 107 truck deliveries per day (214 total truck trips) are generated by the facility to accept the currently permitted maximum of 1,000 tpd. In addition, the ticketing data indicates the day with highest site-generated traffic also included one off-site transport of recyclables by truck (an additional two truck trips), for a total of 216 daily truck trips under existing conditions.[10] Under proposed conditions, a total of up to 160 truck deliveries (320 total truck trips per day) will be needed to deliver a maximum of 1,500 tpd of waste to the site, an increase of 53 truck deliveries (106 additional daily truck trips). To reflect a hypothetical worst-case scenario, the analysis also added 128 daily truck trips to reflect the use of 64 trucks to haul waste away from the site; however, as noted, the Proponent will continue to use rail for off-site transport on non-recyclable waste, and, thus, only one truck trip per day, which was included in the trip generation estimate for existing conditions, will be used to transport recyclable material off-site. Under proposed conditions, the site was therefore modeled as generating a total of 450 daily truck trips, including 216 trips associated with existing operations and 234 trips associated with the proposed increase in capacity. Under existing conditions, employees generate 48 vehicle trips per day; because the number of employees will not increase, all 48 trips are considered existing trips. By applying the hourly distribution of project-generated truck trips under existing conditions to the truck trip estimate under proposed conditions, the project will generate an additional 32 truck trips in the AM peak period (a total of 62 truck trips including existing trips) and an additional 12 truck trips in the PM peak period (a total of 22 truck trips including existing trips).

The DEIR provided updated peak period capacity analyses and level-of-service (LOS) designations for through traffic and each turning movement at study area intersections. The LOS reflects the overall operations of an intersection, including traffic speed, delay, and capacity. For urban intersections, LOS D reflects an acceptable level of operations; LOS E or F reflects significantly congested conditions and long delays. The analysis included the Existing 2025 condition, which represents existing roadway volumes (including existing site-generated trips); the No Build 2032 condition, which incorporates a 2.0% compounded annual growth rate added to traffic volumes under Existing 2025 conditions; and the Build 2032 condition, which includes the addition of project-generated truck trips to the No Build 2032 scenario (including, for modeling purposes, the 128 trips for off-site transport that will not be needed due to the use of rail). According to the DEIR, all study area intersections operate, and will continue to operate, at LOS C or better during both peak periods under all three modeled scenarios, and no changes in LOS are expected from No Build 2032 to Build 2032 conditions, including at the intersection of Lancaster Street at Viscoloid Avenue which was analyzed due to its location on a route used by local packer trucks. No mitigation was proposed in the DEIR because project-generated truck trips will have minimal impacts on traffic operations in the study area, as shown by the lack of change in LOS between the No Build 2032 and Build 2032 scenarios.

The Scope included in the ENF Certificate required the DEIR to identify truck routes used by packer trucks or other trucks transporting waste to the site from curbside collection in Leominster or from locations that do not require access from I-190, and a description of queuing by trucks that are waiting to enter the site prior to the opening of the facility or during periods

[10] The analysis estimated that under the existing permitted capacity of 1,000 tpd, an additional 86 truck trips hypothetically could be generated for off-site transport of waste, if rail were not in use; however, in practice this waste is removed off-site by rail and, thus, these trips were not included in the analysis as existing conditions.

when the facility is at capacity with respect to the number of trucks that can be managed on-site. In addition to adding to the traffic analysis the intersection of Lancaster Street at Viscoloid Avenue, which is an intersection that some packer trucks use to access the site from curbside pickups in Leominster, the DEIR assessed potential impacts of air emissions on EJ populations along that portion of the truck route (as described above). The DEIR also confirmed observations by residents that trucks delivering waste to the site may arrive before the facility is open to accept waste and stop along the side of Lancaster Street until the facility opens. According to the DEIR, the Propponent has identified trucking companies engaged in this practice and issued warnings that the waste delivered to the facility by the companies will not be accepted if the delivery trucks arrive before the facility is open. The FEIR should include a commitment by the Proponent to continue to monitor the compliance of customers of the facility with this directive. The FEIR should include a clear commitment to continue to use rail to reduce emissions from truck traffic, and should clarify whether this will be a condition of the revised permit from MassDEP or the local Board of Health.

According to the DEIR, the Proponent encourages employees to use alternative modes of transportation by providing showers and changing rooms for employees who bike or walk to work, and providing vanpool services for workers staffing the recycling operations, who are through a local employment agency. In addition, employee shifts do not coincide with peak traffic periods; therefore, employee vehicle trips to do not contribute to peak period traffic conditions. However, as noted, the primary mitigation measure for minimizing truck trips is the use of rail to transport waste off-site, which will eliminate 128 new truck trips per day that would be otherwise required in connection with the proposed increase in capacity.

Climate Change

The DEIR provided an assessment of the resilience of the facility under projected 2070 climate conditions and provided an estimate of the project's stationary and mobile-source Greenhouse Gas emissions.

Adaptation and Resiliency

As previously summarized in the ENF Certificate, the Proponent used the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool")[11] to produce an output report used to assess the climate risks of the project. Based on the output report previously provided the ENF, the project site has a "High" exposure rating based on the project's location for riverine flooding associated with extreme precipitation, and "Moderate" exposure ratings for extreme heat and urban flooding associated with extreme precipitation. Based on the 30-year useful life identified for the project and the self-assessed criticality of the existing transfer station building, the MA Resilience Design Tool recommends a planning horizon of 2050 and a return period associated with a 25-year (4% chance) storm event for extreme precipitation when considering resiliency design measures. As previously reported in the ENF, both the 100-year and 500-year flood elevations of the streams adjacent to the site are well below the elevation where waste processing activities take place, and the site is not likely to be subject to flooding under future climate conditions.

[11] https://resilientma.org/rmat_home/designstandards/

The DEIR included an assessment of the resilience of the existing stormwater management system under projected 2070 climate conditions using data available through the MA Resilience Design Tool. The stormwater management system consists of deep sump hooded catch basins equipped that flow to oil-grit separators to remove Total Suspended Solids (TSS) and oils from stormwater before flows are directed to one of three subsurface infiltration systems on site. As the site is considered a Land Use with Higher Potential Pollutant Load) (LUHPPL) per the Massachusetts Stormwater Management Standards (SMS), it has been designed achieve 44% pre-treatment standards prior to infiltration and to treat a water quality volume of 1" over the impervious surface. According to the DEIR, the stormwater management system, which was constructed at the same time as the building in 2019, was designed to accommodate flows from a 24-hour, 100-year storm event with a precipitation depth of 6.5 inches. Because the project will not add new impervious area, no changes to the stormwater management system are proposed. However, the DEIR evaluated the performance of the stormwater management under projected 2070 storm events. According to the DEIR, the existing stormwater management system can accommodate runoff from the projected 2070 24-hour 10-year storm event, which has a precipitation depth of 6.4 inches (slightly less than the 6.5 inches of rain associated with the present-day 100-year storm event). The Proponent used HydroCAD modeling software to assess the performance of the stormwater management system under projected 2070 25-year and 100-year storm events, which have 24-hour precipitation depths of 8.1 inches and 11 inches, respectively. The results of the modeling analysis determined that one of the existing infiltration systems has adequate capacity to handle flows from the 2070 25- year and 100-year storm events without modification; however, the other two infiltration systems would need to be enlarged or modified with an outlet pipe to prevent overflow under projected 2070 conditions. According to the DEIR, the stormwater management system will be modified in response to larger storm events as needed.

The MA Resilience Design Tool recommends the 90th heat percentile when planning for extreme heat conditions (which indicates an increase in extremely hot days as compared to a historical baseline). The DEIR did not review adaptation and resiliency measures intended to address extreme heat; however, as noted above, the project will not add new impervious area and the Proponent will plant trees to improve the vegetative buffer around the perimeter of the site and to mitigate GHG emissions.

Greenhouse Gas Emissions

As the project does not exceed mandatory EIR thresholds, it is not subject to review under the May 5, 2010 MEPA GHG Policy. However, analysis may be required under MEPA EJ protocols, if the facility's stationary-source emissions exceed 2,000 tpy of GHG emissions for conditioned spaces using the GHG Emissions Footprint Estimation Tool.[12] Based on the use of the Tool, the facility is estimated to generate 80 tpy of GHG; therefore, no additional analysis of stationary-source emissions is required.

As discussed above, the DEIR included a mesoscale air analysis that evaluated potential GHG emissions associated with the project's mobile source emissions. As shown in Table 1

[12] https://www.mass.gov/doc/ghg-emissions-calculator/download

above, emissions from project-generated truck trips will emit 5.07 tpy of GHG. No roadway mitigation, which could reduce GHG emissions by improve traffic operations, is proposed because the traffic study determined that the project will have minimal impacts on the roadway network. As noted above, GHG emissions are minimized through the use of rail to transport waste off-site, which would eliminate more than 50% of emissions associated with truck traffic under proposed conditions.

SCOPE

General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content and provide the information and analyses required in this Scope. The Scope should be read in the context of the Review of the DEIR section above. It should demonstrate that the Proponent will pursue all feasible measures to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible. The FEIR should comprehensively list and describe all proposed mitigation measures.

Project Description and Permitting

The FEIR should include a site plan and identify any changes to the project since the filing of the DEIR. It should identify and describe state, federal, and local permitting and review requirements associated with the project and provide an update on the status of each of these pending actions. In particular, if the Leominster Board of Health has commenced its review of the project, the FEIR should provide a status report on the proceedings, including public hearings and analyses required by the Board of Health. The FEIR should include a description and analysis of applicable statutory and regulatory standards and requirements, and a discussion of the project's consistency with those standards.

Environmental Justice / Public Health

The FEIR should include an updated PIP that incorporates any additional or revised methods for engaging with EJ populations adopted by the Proponent based on feedback received from the public or the City. The Proponent should prepare updated materials identified in the Draft PIP as necessary to reflect changes to the project and future opportunities for public review. The Proponent should continue meaningful engagement efforts prior to filing the FEIR, including by directly corresponding with community members who commented on the DEIR, holding an additional public informational meeting upon request, and organizing and enacting creative involvement strategies that meet members of the community where they are (for example, by organizing meetings with pre-existing groups (e.g., grassroots organizations, neighborhood associations, etc.) or organizing in natural areas of congregation (e.g., within places of worship, libraries, and community events). The FEIR should provide a detailed description of the Proponent's procedures for receiving and responding to complaints, including coordination with the City, MassDEP, and complainants.

With regard to project impacts, the Proponent should include an update on its efforts to respond to community comments and complaints, specifically related to truck routing controls, noise and odor mitigation efforts, and railroad crossing traffic control. The FEIR should quantify the number of trees proposed to be planted to increase the vegetative barrier around the site. The FEIR should continue to explore feasible mitigation measures to address cumulative air quality impacts on environmental justice communities, such as targeted measures in census blocks with elevated NO_2 indicators or implementing EV charging infrastructure for trucks

Solid Waste

The FEIR should describe the activities conducted at the facility outside of waste acceptance hours under existing and proposed conditions. As requested by MassDEP, the FEIR should clarify what the anticipated operating hours of the facility will be and how that differs from the approved waste acceptance hours. The FEIR should confirm the tonnage limits that will be requested for each type of waste on a daily basis and for overnight storage. The FEIR should provide an estimate of the remaining capacity of the facility after the daily tonnage is increased to 1,500 tons, and identify any changes that could be needed to accommodate more than 1,500 tpd of waste in the future. The FEIR should include a clear commitment to use rail for off-site transport of non-recyclable waste, and confirm whether the revised permitting from MassDEP or local Board of Health will require the use of rail in lieu of trucks for off-site transport of non-recyclable materials after handling at the facility.

Odor

The FEIR should provide additional details about the supplemental odor analysis provided in the DEIR. It should specify the modeling assumptions used, including whether the model assumed that waste in the rail cars was covered, and how the results were assessed to reach the conclusions summarized in the DEIR.

Air Quality

The FEIR should confirm that the emissions estimates for 2025 Existing and 2032 No Build scenarios in the mesoscale analysis are for trucks only and do not also include emissions from other vehicles in the transportation study area. The FEIR should confirm that improvements in background conditions as modeled under future No Build conditions, and attributed to improvements in engine technology, also apply to truck traffic, given delayed implementation of federal clean truck mandates. The FEIR should specify the conversion rates used (VMT to TPY of emissions) to estimate No Build and Build emissions, and confirm that they are applicable to engine technologies used for truck traffic including the tractor trailers modeled for off-site transport. The FEIR should discuss the feasibility of implementing charging infrastructure for trucks, in anticipation of future clean truck mandates.

Mitigation and Draft Section 61 Findings

The FEIR should include a separate chapter summarizing all proposed mitigation measures. This chapter should also include a comprehensive list of all commitments made by the

Proponent to avoid, minimize and mitigate the environmental and related public health impacts of the project, and should include a separate section outlining mitigation commitments relative to EJ populations. The filing should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The list of commitments should be provided in a tabular format organized by subject matter (traffic, water/wastewater, GHG, EJ, etc.) and identify the Agency Action or Permit associated with each category of impact. Draft Section 61 Findings should be separately included for each Agency Action to be taken on the project. The filing should clearly indicate which mitigation measures will be constructed or implemented based upon project phasing to ensure that adequate measures are in place to mitigate impacts associated with each development phase.

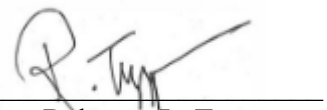
Responses to Comments

The FEIR should contain a copy of this Certificate and a copy of each comment letter received on the DEIR. The FEIR should contain a direct response to the scope items in this Certificate and to comments received on the DEIR. To ensure that the issues raised by commenters are addressed, the FEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the FEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the FEIR to each Person or Agency who previously commented on the DEIR, each Agency from which the project will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. The Proponent may circulate copies of the FEIR to commenters other than Agencies in a digital format (e.g., CD-ROM, USB drive) or post to an online website. However, the Proponent should make available a reasonable number of hard copies to accommodate those without convenient access to a computer to be distributed upon request on a first come, first served basis. A copy of the FEIR should be made available for review in the Leominster Public Library.

November 7, 2025
Date



Rebecca L. Tepper

Comments received

10/07/2024	Haily Brady
10/24/2025	Massachusetts Department of Transportation (MassDOT)
10/29/2025	Massachusetts Department of Environmental Protection (MassDEP)/Central Regional Office (CERO)
10/29/2025	Steve Allain
10/321/2025	Steve Allain

Energy & Environmental Affairs
Public Comments Portal

alexander.strysky@mass.gov

View Comment

Comment Details

EEA #/MEPA ID
16878

Comments Submit Date
10-7-2025

Certificate Action Date
10-24-2025

Reviewer
Alexander Strysky, (857)408-6957, alexander.strysky@mass.gov

First Name
Haily

Last Name
Brady

Phone
--

Email
hailybrady16@gmail.com

Address Line 1
200 Harvard St

Address Line 2
--

State
MASSACHUSETTS

Zip Code
01453

Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Concerned citizen

Comments

This area cannot handle an increase in traffic. The design of the intersections in North Leominster are an absolute nightmare now. Adding large vehicles and an increase in volume of any kind, is irresponsible. The larger issue, however, is the environmental impact. The Nashua River is still healing from the damaging effects and pollution the plastic and chemical factories had on it decades ago. The river is no longer changing colors and I feel that's something we should maintain. This river is also prone to flooding and runoff or accidental spillage would most likely spread throughout the city. Bad idea all around

Attachments

Update Status

Status
Accepted

SUBMIT

Share Comment

SHARE WITH A REGISTERED USER

BACK TO SEARCH RESULTS

Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Phillip Eng, Interim MassDOT Secretary

massDOT
Massachusetts Department of Transportation

October 24, 2025

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Leominster – United Material Management of Leominster – DEIR
(EEA #16878)

ATTN: MEPA Unit
Alexander Strysky

Dear Secretary Tepper:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Draft Environmental Impact Report for the United Material Management of Leominster as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

cc: Jonathan Gulliver, Administrator, Highway Division
Carrie Lavallee, P.E., Chief Engineer, Highway Division
Barry Lorion, P.E., District 3 Highway Director
James Danila, P.E., State Traffic Engineer
Montachusett Regional Planning Commission (MRPC)
Leominster Office of Planning and Development

Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Phillip Eng, Interim MassDOT Secretary

massDOT
Massachusetts Department of Transportation

MEMORANDUM

TO: David Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: October 24, 2025

RE: Leominster – United Material Management of Leominster – DEIR
(EEA #16878)

The Public/Private Development Unit (PPDU) has reviewed the Draft Environmental Impact Report (DEIR) for the United Material Management of Leominster (the "Project") submitted by Green Seal Environmental, LLC on behalf of United Material Management of Leominster, LLC (the "Proponent"). The Project site includes a 32,400-square-foot (sf) solid waste transfer (MSW) and handling building, which features 1,260 sf of attached office space, totaling a footprint of 33,660 sf. The site also has a rail yard, scale house, parking areas, and grading and paving, along with related facilities. It includes catch basins, drainage manholes, and underground infiltration systems designed to manage stormwater according to Massachusetts Stormwater Standards. The site is bordered by Tanzio Road to the east and a rail line to the west. Part of the northern section of the property contains an electrical easement with transmission towers, while the northern area is vacant industrial-zoned land. The southern part of the site consists of additional vacant land with a wooded wetland area surrounding a brook.

The Project aims to increase the allowed tonnage at the MSW and C&D handling and transfer facility. The goal is to raise its maximum daily capacity from 1,000 tons per day (tpd) to 1,500 tpd, representing a 500 tpd increase. The facility operates six days a week and is projected to reach an annual capacity of 450,000 tons. It is expected to have a lifespan of about 30 years, which equates to an estimated total capacity of 13.5 million tons. Access to the site is via Tanzio Road.

The Project previously submitted an Environmental Notification Form (ENF) on September 25, 2024, for which the Secretary of Energy and Environmental Affairs issued a Certificate on December 9, 2024, requiring the Proponent to prepare a DEIR.

The DEIR includes a TIA prepared in accordance with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines*. The TIA analyzes the study area, focusing on the Project's impact on intersection operations and safety. The Project is only expected to generate up to 234 new daily truck trips (117 entering and 117 exiting), though only 106 of these are directly related to inbound material transport, with most outbound

material handled by rail or backhaul. The traffic analysis used conservative estimates, showing that area intersections, including those in Environmental Justice (EJ) communities, will maintain acceptable levels of service through 2032, with no mitigation measures needed. Tanzio Road, which serves industrial uses, lacks pedestrian and bicycle infrastructure but is not expected to be used for such purposes.

Based on the Project's minimal impact on the state highway transportation system, MassDOT recommends that no additional MEPA review be required for this project based on transportation issues. If you have any questions about these comments, please feel free to contact William Simon at *William.M.Simon@dot.state.ma.us*.

The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston, MA 02114
Phone: 617-292-5500

Maura T. Healey	Kim Driscoll	Rebecca Tepper	Bonnie Heiple
Governor	**Lieutenant Governor**	**Secretary**	**Commissioner**

October 29, 2025

Secretary Rebecca Tepper
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Attention: MEPA Unit – Alexander Strysky

Re: Draft Environmental Impact Report (DEIR)
United Material Management of Leominster, LLC
Leominster
EEA #16878

Dear Secretary Tepper,

The Massachusetts Department of Environmental Protection's (MassDEP) Central Regional Office has reviewed the DEIR for the proposed expanded operations at United Material Management of Leominster (the "Project"). United Material Management of Leominster, LLC (the "Proponent") is proposing to increase the existing waste handling operation, currently permitted for 1,000 tons per day (tpd), by 500 tpd to 1,500 tpd. The

maximum annual capacity will increase from 300,000 tons to 450,000 tons. The facility, located at 200 Tanzio Road, consists of a 32,400-square-foot (sf) solid waste handling building with 1,260 sf of attached office space. The property includes a rail yard, a scale house and scales, parking areas, stormwater collection structures, and associated appurtenances. The Project will not include an increase in the building size or construction of additional buildings.

The Project is under MEPA review because it meets or exceeds the following review threshold:

- 301 CMR 11.03(9)(b)(1) - New Capacity or Expansion in Capacity for combustion or disposal of any quantity of solid waste, or storage, treatment or processing of 50 or more tpd of solid waste, unless the Project is exempt from site assignment requirements.

The Project requires the following State Agency Permit:

- MassDEP - Large Handling Facility Modification (SW 07).

The Proponent filed an Environmental Notification Form (ENF) to construct and operate a 1,000 tpd handling and transfer station at this location (EEA #15896), which was published in the Environmental Monitor on August 8, 2018. The Secretary of Environmental Affairs (the "Secretary") issued a Certificate on the ENF for that project on September 7, 2018, stating no EIR was required.

The DEIR states that the Project is unchanged since the current ENF. One or more Environmental Justice Populations are located within the Designated Geographic Area around the Project. MassDEP offers the following comments:

Alternatives Analysis

The Certificate required the DEIR to discuss whether operations at the current location could be modified to further minimize traffic, odor and noise impacts as compared to the Project as proposed. The Proponent discusses the following potential modifications in the DEIR:

- reduce noise from the ventilation system by increasing the fan size to reduce revolutions, thereby reducing vibrational noise,
- reduce noise from the ventilation system by adding sound dampening materials to the unit,
- Modifying the overhead door mechanisms to allow the doors to close quicker if operations are odorous and need to be contained to prevent impacts,
- continued use of rail for transporting outbound materials to reduce the amount of vehicles accessing the Facility as well as emissions,
- ensure vehicles accessing the facility adhere to anti-idling rules, and
- maintain communications with haulers and those using the Facility to ensure and enforce facility rules including trucks not parking /queuing outside the Facility, not using Malburn St, and following signage.

However, the discussion focuses mostly on noise and traffic and only minimally addresses potential odors. As noted below, additional information should be provided in the Final EIR (FEIR) to address the potential for increased odors if the increased capacity is approved.

Solid Waste

The Certificate required the Proponent to review existing permitting requirements established by MassDEP and the Leominster Board of Health and describe how the proposed increase in capacity will comply with existing permit conditions and identify any changes that may be necessary to accommodate the additional waste. The DEIR includes an assessment of the existing facility (the "Facility") and concludes the following:

- the Facility has ample interior accessways to provide adequate truck queuing space,
- the Facility uses of two scales to assist in traffic flow and to minimize delays,
- the existing number of doorways are adequate to handle the proposed increase,
- the handling building has adequate interior area to stockpile and temporarily store up to 2,200 tons of C&D residuals or MSW, as well as up to 800 additional tons of C&D separate from the tipping and loadout areas.
- the processing /sorting line operates at a general capacity of 30 tons per hour and averages 198 tons of C&D per day, according to the Facility's annual solid waste

reports. This is well below the processing line capacity and feasibly allows for inbound C&D to double in the proposed project.

The Proponent concludes that no changes are needed to the Operation and Maintenance Plan or to the building. However, an increase in tonnage requires a Large Handling Facility Modification (SW 07) permit. Please see the comments below concerning capacity for overnight storage and other operational issues.

Noise

The Proponent was required to respond to comments that raised noise concerns or suggested additional mitigation measures for this impact. The DEIR lists the controls and mitigation measures currently in place to reduce sound impacts from the Facility operation. The DEIR states that one mitigation measure will be "Limiting equipment operation outside the building prior to 6 AM (weekdays) and 7 AM (Saturday); and after 7 PM (weekdays) and 3 PM (Saturday)." These are the waste acceptance hours allowed by the facility site assignment as well as MassDEP's Authorization to Operate permit, not the overall operating hours for the Facility. In light of this statement, the Proponent should clarify what the anticipated operating hours of the Facility will be and that differs from the approved waste acceptance hours.

Odor

The ENF included an odor study to determine the potential odor impacts from the Facility on residential and commercial receptors near the site. The Certificate noted that the odor modelling did not appear to account for odors emanating from loaded railcars stored outside the facility and that the DEIR should explain how this potential source of odor is accounted for as a potential impact in the model or through other means under existing and proposed conditions. The Certificate also directed the Proponent to identify mitigation measures to minimize odors from exterior sources. The DEIR states that the odor model was revised to include railcars and concluded that, with covering and timely rotation of railcars, odors from railcars remain negligible as long as the best management practices from the facility's Operations and Maintenance Plan were followed. The revised study concluded that results of the model would not change.

The Proponent was required to review any odor complaints received by MassDEP and the Leominster Board of Health, as well as the specific incidents identified in comment letters from various residents. The Proponent was directed to review weather conditions and any records maintained by the Proponent concerning the volume and type of waste handled on days complaints were received to assess the conditions that may have contributed to the odorous conditions. The Proponent was also required to identify any operational measures and treatment practices that could be implemented to address conditions corresponding to the odor complaints. MassDEP believes this issue was sufficiently addressed in the DEIR.

The Certificate required the DEIR to discuss how the Proponent will operate the facility to ensure that no more municipal solid waste ("MSW") is stored overnight on the tipping floor than from which odors can be adequately mitigated through the use of odor controls, whether this limit will be a term of the Board of Health or MassDEP permit. The amount of MSW allowed to be stored overnight will be limited as a condition of MassDEP's SW07 Modification of a Large Handling Facility permit. The DEIR states, "It is important to note that consistently storing 600 tons on the floor would compromise operational efficiency given the spatial constraints, making 150 tons a more realistic and sustainable daily target." UMML is not requesting a change to the 600 tons per day maximum for overnight storage of MSW or increasing the size of the Facility, therefore, the FEIR should include information explaining how the operational efficiency will be maintained without decreasing the maximum allowed volume of overnight MSW storage.

Air Quality

According to the ENF, measures to minimize air emissions from operation of the Facility include handling all waste within the enclosed building, using a water-based misting system in the building to control dust, and using equipment that complies with EPA emissions standards for diesel engines. The Certificate required the Proponent to identify any additional measures that could be implemented to further minimize air emissions associated with operation of the Facility. MassDEP will require a hard-piped misting system to be operated at all times during waste acceptance hours as a permit condition in the SW07 Modification of a Large Handling Facility Permit. If it is not feasible to operate the misting system at all times during waste acceptance hours, the FEIR should explain why it

The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston, MA 02114
Phone: 617-292-5500

is not feasible and propose alternative protocols that would be implemented to ensure compliance with this permit condition.

MassDEP appreciates the opportunity to comment on the Project. If you have any questions regarding these comments, please do not hesitate to contact JoAnne Kasper-Dunne, Central Regional Office MEPA Coordinator, at joanne.kasper-dunne@mass.gov.

Very truly yours,

Mary Jude Pigsley
Regional Director

cc: Commissioner's Office, MassDEP

From: Steven Allain
To: Strysky, Alexander (EEA)
Cc: Boccadoro, Helena (DEP); Briggs, Andrea (DEP); Harson, Kate (EEA); Hughes, Jennifer (EEA); Kasper-Dunne, JoAnne (DEP); Kim, Tori (EEA); Lucien, Lionel (DOT); Timmermann, Timothy; Mejia, Josbel (EEA); mrpc@mrpc.org; Laura Bugay; Michelle Powell; dmazzarella; Cushner, Mary (DEP); Volkerding, John (DEP); McQuade, James (DEP); lenglish@leominster-ma.gov; PAUL BRAYTON; Lisa Christy; tonystymiest@yahoo.com; davedill2016@gmail.com; frankie111290@gmail.com; Deb.Buckley@gmail.com; claire@uumassaction.org; juliablatt; Jodi.Valenta@tpl.org; kerry@msaadapartners.com; sylvia@communityactionworks.org; Heather Clish; jepke@clf.org; Britteny Jenkins; Amy Boyd Rabin (she/her); zsaifee@environmentalleague.org; ben@environmentmassachusetts.org; robb; cluppi@cleanwater.org; Lena@N2NMa.org; Miles@N2NMa.org; rob@oceanriver.org; deb.pasternak@sierraclub.org; Heidi Ricci; tribalcouncil@chappaquiddickwampanoag.org; crwritings; Peters, John (EOHLC); melissa@herringpondtribe.org; rockerpatriciad@verizon.net; rhalsey; Coradot@yahoo.com; Solomon.Elizabeth@gmail.com; Brian.Weeden@mwtribe-nsn.gov; david.weeden@mwtribe-nsn.org; 106Review@mwtribe-nsn.gov; thpo@wampanoagtribe-nsn.gov; info@spanishamericancenter.org; lcc01453@gmail.com; rracine@leominster-ma.gov; Higgins, Natalie - Rep. (HOU); nbutler@leominster-ma.gov; nkremp@leominster-ma.gov; David Cormier; ewood; DPHToxicology
Subject: Re: Notice of MEPA Comment Period Extension - EEA#16878, United Material Management, Leominster
Date: Wednesday, October 29, 2025 7:58:53 AM

This is at 7:30am on 10/29/25, 1/4 mile from the proposed site in front of the current Restore location. Adding more traffic is a GREAT idea.

On Fri, Oct 24, 2025, 3:15 PM Strysky, Alexander (EEA) <alexander.strysky@mass.gov> wrote:

> The comment period on the Draft Environmental Impact Report (DEIR) has been extended to October 31, 2025. The MEPA Certificate on the DEIR will be issued on November 7, 2025. Comments may be submitted my email to alexander.strysky@mass.gov or via the MEPA Public Comments Portal.

The project involves the proposed to increase waste handling operations from 1,000 tons per day (300,000 tons per year) to 1,500 tons per day (450,000 tons per year) by United Material Management (UMM) of Leominster. The facility accepts Municipal Solid Waste (MSW) and Construction and Demolition (C&D) waste delivered by trucks. The waste will be handled within the building, sorted to remove recyclable material, and loaded on to rail cars or trucks within the building. No expansion of the building is proposed. The increased waste handling would increase the daily number of truck trips from 214 (107 entering, 107 exiting) to 320 (160 entering, 160 exiting) with materials (except recyclables) transported off the site by rail.

Alex Strysky

MEPA Office

100 Cambridge Street

Boston, MA 02114

Cell: (857) 408-6957

NEW!! MEPA has proposed amendments to its regulations at 301 CMR 11.00 to streamline housing and ecological restoration projects. More information is available here.

Effective July 1, 2025, use of the MEPA e-Filing Portal is mandatory for ENF, NPC and EIR filings. More information is available on the MEPA website.

From: Steven Allain
To: Strysky, Alexander (EEA)
Date: Wednesday, October 29, 2025 8:01:37 AM

Has paving the road been concidered in this update proposal. Not been paved since 1992.

From: Steven Allain
To: Strysky, Alexander (EEA)
Cc: Boccadoro, Helena (DEP); Briggs, Andrea (DEP); Harson, Kate (EEA); Hughes, Jennifer (EEA); Kasper-Dunne, JoAnne (DEP); Kim, Tori (EEA); Lucien, Lionel (DOT); Timmermann, Timothy; Mejia, Josbel (EEA); mrpc@mrpc.org; Laura Bugay; Michelle Powell; dmazzarella; Cushner, Mary (DEP); Volkerding, John (DEP); McQuade, James (DEP); lenglish@leominster-ma.gov; PAUL BRAYTON; Lisa Christy; tonystymiest@yahoo.com; davedill2016@gmail.com; frankie111290@gmail.com; Deb.Buckley@gmail.com; claire@uumassaction.org; juliablatt; Jodi.Valenta@tpl.org; kerry@msaadapartners.com; sylvia@communityactionworks.org; Heather Clish; jepke@clf.org; Britteny Jenkins; Amy Boyd Rabin (she/her); zsaifee@environmentalleague.org; ben@environmentmassachusetts.org; robb; cluppi@cleanwater.org; Lena@N2NMa.org; Miles@N2NMa.org; rob@oceanriver.org; deb.pasternak@sierraclub.org; Heidi Ricci; tribalcouncil@chappaquiddickwampanoag.org; crwritings; Peters, John (EOHLC); melissa@herringpondtribe.org; rockerpatriciad@verizon.net; rhalsey; Coradot@yahoo.com; Solomon.Elizabeth@gmail.com; Brian.Weeden@mwtribe-nsn.gov; david.weeden@mwtribe-nsn.org; 106Review@mwtribe-nsn.gov; thpo@wampanoagtribe-nsn.gov; info@spanishamericancenter.org; lcc01453@gmail.com; rracine@leominster-ma.gov; Higgins, Natalie - Rep. (HOU); nbutler@leominster-ma.gov; nkremp@leominster-ma.gov; David Cormier; ewood; DPHToxicology
Subject: Re: Notice of MEPA Comment Period Extension - EEA#16878, United Material Management, Leominster
Date: Wednesday, October 29, 2025 8:16:07 AM

Fork truck in road. Person stopping traffic. Please allow more traffic.

On Wed, Oct 29, 2025, 8:04 AM Steven Allain <sallain113@gmail.com> wrote:

Two 18 wheel trucks unloading on street now.

On Fri, Oct 24, 2025, 3:15 PM Strysky, Alexander (EEA) <alexander.strysky@mass.gov> wrote:

> The comment period on the Draft Environmental Impact Report (DEIR) has been extended to October 31, 2025. The MEPA Certificate on the DEIR will be issued on November 7, 2025. Comments may be submitted my email to alexander.strysky@mass.gov or via the MEPA Public Comments Portal.
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>
> Alex Strysky
>
> MEPA Office

100 Cambridge Street

Boston, MA 02114

Cell: (857) 408-6957

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From: Steven Allain
To: Strysky, Alexander (EEA)
Cc: Boccadoro, Helena (DEP); Briggs, Andrea (DEP); Harson, Kate (EEA); Hughes, Jennifer (EEA); Kasper-Dunne, JoAnne (DEP); Kim, Tori (EEA); Lucien, Lionel (DOT); Timmermann, Timothy; Mejia, Josbel (EEA); mrpc@mrpc.org; Laura Bugay; Michelle Powell; dmazzarella; Cushner, Mary (DEP); Volkerding, John (DEP); McQuade, James (DEP); lenglish@leominster-ma.gov; PAUL BRAYTON; Lisa Christy; tonystymiest@yahoo.com; davedill2016@gmail.com; frankie111290@gmail.com; Deb.Buckley@gmail.com; claire@uumassaction.org; juliablatt; Jodi.Valenta@tpl.org; kerry@msaadapartners.com; sylvia@communityactionworks.org; Heather Clish; jepke@clf.org; Britteny Jenkins; Amy Boyd Rabin (she/her); zsaifee@environmentalleague.org; ben@environmentmassachusetts.org; robb; cluppi@cleanwater.org; Lena@N2NMa.org; Miles@N2NMa.org; rob@oceanriver.org; deb.pasternak@sierraclub.org; Heidi Ricci; tribalcouncil@chappaquiddickwampanoag.org; crwritings; Peters, John (EOHLC); melissa@herringpondtribe.org; rockerpatriciad@verizon.net; rhalsey; Coradot@yahoo.com; Solomon.Elizabeth@gmail.com; Brian.Weeden@mwtribe-nsn.gov; david.weeden@mwtribe-nsn.org; 106Review@mwtribe-nsn.gov; thpo@wampanoagtribe-nsn.gov; info@spanishamericancenter.org; lcc01453@gmail.com; rracine@leominster-ma.gov; Higgins, Natalie - Rep. (HOU); nbutler@leominster-ma.gov; nkremp@leominster-ma.gov; David Cormier; ewood; DPHToxicology
Subject: Re: Notice of MEPA Comment Period Extension - EEA#16878, United Material Management, Leominster
Date: Friday, October 31, 2025 7:39:45 AM

The third truck this morning.

On Fri, Oct 31, 2025, 7:28 AM Steven Allain <sallain113@gmail.com> wrote:

This pic is at 7am this morning. Please allow MORE traffic.

On Fri, Oct 24, 2025, 3:15 PM Strysky, Alexander (EEA) <alexander.strysky@mass.gov> wrote:

> The comment period on the Draft Environmental Impact Report (DEIR) has been extended to October 31, 2025. The MEPA Certificate on the DEIR will be issued on November 7, 2025. Comments may be submitted my email to alexander.strysky@mass.gov or via the MEPA Public Comments Portal.
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>
> Alex Strysky
>
> MEPA Office

100 Cambridge Street

Boston, MA 02114

Cell: (857) 408-6957

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