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May 1, 2026

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

PROJECT NAME	: WIN Waste Innovations of Northern New England, Inc Transfer Station (formerly United Materials Management of Leominster)
PROJECT MUNICIPALITY	: Leominster
PROJECT WATERSHED	: Nashua River
EEA NUMBER	: 16878
PROJECT PROPONENTS	: WIN Waste Innovations of Northern New England, Inc (formerly United Materials Management of Leominster, LLC)
DATE NOTICED IN MONITOR	: March 25, 2026

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 Final Environmental Impact Report (FEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

I acknowledge comments from residents of Leominster that continue to express concern that odor, noise, and traffic impacts associated with the existing facility will worsen if an increase in the daily tonnage of waste processed at the facility is increased. As discussed below and in prior Certificates, the MEPA filings for this project have performed studies and evaluations to assess the project's impacts and mitigation measures in accordance with the purpose of MEPA to provide meaningful opportunities for public review of the potential environmental impacts of projects for which Agency Action is required, and to assist each Agency in using (in addition to applying any other applicable statutory and regulatory standards and requirements) all feasible means to avoid Damage to the Environment or, to the extent Damage to the Environment cannot be avoided, to minimize and mitigate Damage to the Environment to the maximum extent practicable. While I deem the Proponent's disclosures to be adequate for purposes of MEPA review, this Certificate does not constitute an approval of the

project. The Massachusetts Department of Environmental Protection (MassDEP) and the Leominster Board of Health (BOH) must review the project and determine whether the project can be approved and what conditions and mitigation measures are required to ensure that the project meets all relevant performance standards and regulatory requirements. I expect that these agencies will continue to engage the public during subsequent permitting of the project.

Project Description

As described in the Final Environmental Impact Report (FEIR), 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. The FEIR provided updated information about the project's proximity to the floodplain based on a revised Flood Insurance Rate Map (FIRM) number 25027C0288F (effective date July 8, 2025) prepared by the Federal Emergency Management Agency (FEMA). The revised FIRM indicates that the 100-year floodplain associated with Fall Brook north of the site has a Base Flood Elevation (BFE) of approximately 339 ft to 344 ft NAVD 88, and the 100-year floodplain associated with the stream in the southern part of the site has a BFE of approximately 349 to 356 ft NAVD 88; these BFEs are a minimum of 10 ft below the ground level elevation at the site (approximately 365 ft NAVD 88). The revised BFEs are higher than those shown on the previous FIRM; however, as with the previous FIRM, the 500-year floodplain is confined to the area immediately adjacent to Fall Brook and to 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 FEIR maintains the Designated Geographic Area (or DGA) for the project as 1 mile.

Environmental Impacts and Mitigation

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.[1] 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.[2] 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 the BMPs detailed below to minimize noise, odor, and air emissions associated with operation of the facility and transport of waste; planting of 15 additional trees around the perimeter of the site and contributing to community tree planting programs; implement procedures for logging and responding to complaints; using rail cars rather than trucks to transport C&D and MSW off-site; and monitoring and clean up of trash along adjacent streets. Additional mitigation measures may be required by MassDEP and the Leominster BOH in any permits issued for the proposed tonnage increase.

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 MassDEP. The project requires a Minor Modification to an Existing Solid Waste Site Assignment from the Leominster BOH.

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 FEIR

The FEIR was generally responsive to the limited Scope included in the DEIR Certificate. It included supplemental information to clarify analyses provided in the DEIR, draft

[1] 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.
[2] 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.

Section 61 Findings, and responses to comments received on the DEIR. According to the FEIR, there have been no changes to the project design since the DEIR was filed.

The Leominster BOH has not formally initiated the permitting process for the Proponent's request for a Minor Modification to an Existing Site Assignment. However, according to the FEIR, in preparation for the permitting process, the Leominster BOH has engaged third-party consultants to review the Proponent's traffic, odor, and noise studies. According to the FEIR, the third-party consultants have generally confirmed the results of the Proponent's analyses.

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 as new diesel truck traffic is not anticipated to exceed 150 daily trips.

The FEIR reviewed the Proponent's public engagement efforts prior to filing the FEIR and included an updated Public Involvement Plan (PIP). The FEIR also reviewed the Proponent's procedures for receiving and responding to complaints received about the facility's operation; provided responses to complaints and comments submitted by area residents; and identified measures to address cumulative air quality impacts on environmental justice communities.

The FEIR included an updated PIP that documented the two public meetings (including the MEPA consultation session that was held in a hybrid format) conducted during the MEPA review of the project. Both meetings were held prior to filing the DEIR; however, according to the Proponent, no public meetings were requested prior to the filing of the FEIR. The PIP identifies commitments to ongoing public involvement through the MassDEP and Leominster BOH permitting processes, including providing updated information on the project website[3] and advance notice of permit hearings in both Spanish and English. The Leominster BOH has not yet opened the public hearing on the Proponent's application for a Minor Modification to an Existing Solid Waste Site Assignment; however, as noted, the City has engaged third-party consultants to reviewed the traffic and odor analyses, and no concerns have been raised to date with the conclusions of the Proponent's studies.

The FEIR included the Proponent's procedures for receiving and responding to complaints received about the facility, which are typically received by the Proponent from MassDEP or the Leominster BOH after a resident has contacted one of those agencies.

- After receiving a complaint, a representative of MassDEP or the Leominster BOH investigate the complaint by typically going to complainant's location, then visiting

[3] https://www.win-waste.com/about-us/locations/leominster-ma-200tanzio/#UMML

the project site. After receiving notification of the complaint from MassDEP or the Leominster BOH, the Proponent would conduct its own investigation of conditions at the facility.
- The Proponent will correct and/or mitigate the condition if the complaint condition is confirmed
- If the complaint was received directly by the Proponent, the Leominster BOH will be notified of the complaint and the results of the Proponent's investigation into the cause of the complaint; if the confirmed complaint condition is an incident or disruption that could affect public health, safety, environment, or operation of the facility, the Proponent will notify MassDEP within 24 hours
- The Proponent will work with MassDEP and the Leominster BOH to conduct any follow-up actions necessary
- The Proponent will record the incident in a complaint log electronically kept in company's environmental health and safety software (or any equivalent tracking mechanism). Unsubstantiated and unconfirmed complaints will also be recorded in the complaint tracking software.

I recommend that MassDEP and/or the Leominster BOH incorporate this complaint response procedure, with any modifications deemed appropriate, in the permits issued for the project.

The DEIR previously reviewed the six odor complaints and one noise complaint received by the City and/or MassDEP between April 7, 2021 and March 18, 2025 and measures implemented by the Proponent to address verified impacts. According to the FEIR, one additional odor complaint was received by the Leominster BOH in August 2025 which was not included in the DEIR; however, the condition causing the complaint was not verified by the Leominster BOH after its investigation. According to the FEIR, no other noise or odor complaints have been submitted since the filing of the DEIR.

As required, the DEIR contained a baseline assessment of any unfair or inequitable environmental burden and related public health consequences impacting EJ Populations. This assessment included review of air quality related indicators in EPA's EJ Screen and pediatric asthma prevalence for schools serving students residing within the DGA. According to the EJ Screen data, no air related indicators are considered elevated within the EJ Screen tool (i.e. equal to or greater than the 80th percentile compared to statewide values) in EJ census block group within the DGA.[4] Moreover, EJ Populations with relatively higher air quality related indicators within the DGA (but still below the 80th percentile) are generally located north of the site, closer to downtown Leominster. The facility's main truck route proceeds south of the site, towards Route I-190, thus increased truck traffic will not be directed towards the EJ areas with higher air pollution. In addition, only one school with available pediatric asthma data serves communities within the DGA; as reported in the DEIR, the school's asthma prevalence is lower than the state

[4] Note that in the DEIR, nitrogen dioxide (NO_2) was identified as an elevated air related indicator in one EJ population within the DGA; however, the percentile reported in the DEIR (84th percentile) was for the NO_2 EJ index, which is an index value that combines demographic factors with the raw environmental values in a block group. MEPA EJ protocols currently require reporting of only the environmental indicator (which did not exceed the 70th percentile for NO_2 within the DGA).

average (87% of MA average) and is located nearly a mile north of the site, again in the opposite direction of the main truck routes.

Several common concerns with the project were raised by residents through comment letters and during public meetings; these include concerns related to increased truck traffic on Tanzio Road, Lancaster Street, and other streets near the project site; garbage debris on Tanzio Road and Lancaster Street unintentionally littered by trucks transporting waste to the site; noise associated with operation of the facility and loading of rail cars for off-site transport of waste; and odor associated with the facility. As previously documented in the DEIR, the Proponent has committed to enforce delivery hours and to monitor Lancaster Street to identify any trucks destined for the site that are parked along the street waiting for the facility to open, ensure that all trucks have adequately covered waste; and picking up trash along Tanzio Road, including nails and screws. According to the FEIR, the Proponent has not observed, nor have complaints been received regarding, delivery trucks parking on Lancaster Street since the DEIR was filed. The Proponent further asserts that trash along Lancaster Street may be attributable to trucks and other vehicles unrelated to the facility; however, based on the ongoing need to clean up trash on Tanzio Road (which only services the site and abutting residences), it is reasonable to assume that trucks delivering waste to facility contribute to the trash on Lancaster Street. I encourage MassDEP and/or the Leominster BOH to require the Proponent to contribute to cleanup of trash on Lancaster Street. Potential mitigation measures in this regard include the Proponent extending street sweeping efforts along Lancaster Street or the Proponent assisting in the purchase of a street sweeper for use by the City.

The analyses of the project's traffic impacts and mobile-source air emissions conservatively assumed that all processed waste will be transported off-site using trucks, resulting in an increase in the number of truck trips from 216 under existing conditions (1,000 tpd limit) to 450 under proposed conditions (1,500 tpd limit). According to the FEIR, this conservative analysis determined that the project would have minimal impacts on traffic operations and air emissions based on an estimated reduction of mobile source emissions compared to existing conditions (due primarily to anticipated mandated improvements to truck engine technology). However, the FEIR included firm commitments from the Proponent that the facility will continue the use of rail to transport of a portion of waste off-site, which will reduce the number of truck trips associated with the tonnage expansion by 128 trips, to a total of 322 daily truck trips under proposed conditions (an increase of 106 truck trips per day compared to existing conditions). According to the FEIR, the Proponent facilitated a meeting between the City and the CSX railroad company regarding improvements to rail infrastructure, such as new signage and railroad crossing traffic control to improve safety and minimize traffic disruptions. These conversations should be on-going and informed by priorities raised by constituents and City leadership during the Leominster BOH site assignment process.

The FEIR reviewed potential mitigation measures to be implemented by the Proponent to address cumulative air quality impacts on environmental justice communities. According to the FEIR, the Proponent will continue to maintain the trees and shrubs planted around the perimeter of the site when the existing facility was constructed in 2019; this vegetated buffer has matured and likely reduces noise exposure and provides a visual screen. To increase the existing vegetative barrier around the site and potentially mitigate air quality impacts, the Proponent has

committed to plant 15 additional native trees at the site. The Proponent will install EV charging stations at the site, if requested by employees and/or clients delivering waste to the site using electric vehicles or if the Proponent adds electric vehicles to its fleet of waste transport vehicles. According to the FEIR, the Proponent will evaluate making a donation to an urban canopy renewal program such as the Department of Conservation and Recreation's (DCR) Greening the Gateway Cities program and/or Growing Places, which is a non-profit organization in Leominster that focuses on supporting a community-based food program but also provides outreach and educational programming in Leominster in support of the supports the Greening the Gateway Cities program.

Finally, according to the project website, the Proponent is currently subject to a host community agreement that includes a host community fee for mutual benefit. It is anticipated that a new host community agreement will be developed in connection with the Leominster BOH's review of the project. I encourage the City to engage the public as it finalizes the host community agreement for the project, and consider the measures evaluated as part of this MEPA review.

Solid Waste Management

As required by the Scope included in the DEIR Certificate, the FEIR clarified the facility's hours of operation and the activities proposed to occur within certain time periods. According to the FEIR, the facility's permits restrict only the hours during which waste may be delivered to the site; there are no time restrictions for other waste management operations, including maintenance and railcar or truck loadout. The facility is permitted to accept waste from 6:00 AM to 7:00 PM on weekdays and from 7:00 AM to 3:00 PM on weekends ("Permitted Hours"); however, the Proponent accepts deliveries by parties other than its own vehicle fleet only from 6:30 AM to 3:30 PM on weekdays and 7:00 AM to 11:30 PM on Saturdays ("Posted Waste Delivery Hours"). According to the FEIR, most activities, such as material management, processing, loadout, street sweeping, and minor maintenance are conducted during Permitted hours; activities outside of Permitted Hours are primarily conducted within the building, which minimizes potential odor and noise impacts. The Proponent has not proposed to modify its Permitted Hours in connection with the proposed increase in tonnage to 1,500 tpd; however, the Leominster BOH may impose restrictions on the facility's operating hours.

The existing Authorization to Operate allows overnight storage within the building of 375 tons of C&D, 1,000 tons of C&D residuals and bulky waste, 600 tons of MSW, and 60 cubic yards (cy) of rejected items (such as food waste or hazardous material). According to the FEIR, the Proponent has requested that no overnight tonnage limits be applied to the facility due to fluctuations in the type of materials received at the site over the course of the year. However, the odor study included in the DEIR determined that additional odor controls may be necessary if over 600 tons of MSW are stored overnight. The Proponent proposes to monitor the frequency at which 600 tons or more of MSW are stored overnight; if that level of overnight storage is exceeded 50% of the time between May and September (and greater than 75% of the time during other months when temperatures are cooler and odors less noticeable), additional odor controls may be implemented, such as adding carbon filters to the air handling system, adding circulating

carbon units within the building, and/or adding a supplemental misting/odor counteractant system that targets the MSW stockpile area.

As required by the Scope included in the DEIR Certificate, the FEIR included an estimate of the total capacity of the facility. According to the FEIR, the existing building (which is not proposed to be expanded to accommodate the increase to 1,500 tpd) has adequate interior area to stockpile and temporarily store up to 2,200 tons of C&D residuals and/or MSW, and up to 800 additional tons of C&D separate from the areas used for active tipping on a daily basis; this equates to storage of three days of storage of material delivered to the site. Under proposed conditions (1,500 tpd), the available storage area can store two days of material. Based on these storage volumes, the facility could receive up to a total 3,000 tpd and have enough space to store that daily tonnage in addition to the necessary receiving and operational space. Therefore, the Proponent estimates that the facility could accept an additional 1,500 tpd after the site is permitted to receive 1,500 tpd; however, no additional increase beyond the 500 tpd proposed in the FEIR (from 1,000 tpd to 1,500 tpd) is proposed at this time. The FEIR did not identify any changes that would be necessary to accept an additional 1,500 tpd in the future.

Odor

The FEIR included additional details about the odor analysis previously provided in the DEIR, which included potential odor emissions from railcars loaded with waste. According to the FEIR, the odor analysis presented in the DEIR modeled odor emissions under a worse-case scenario in which all the waste at the site is MSW (which is a greater source of odor than C&D; however, the facility receives more C&D material than MSW and will continue to do so under proposed conditions); all the doors of the facility would be open at all times (however, in practice, the doors are closed except to allow trucks to enter and exit); and 27 railcars are stored outside the building, including 19 empty railcars and eight railcars full of waste covered by a spray-on material that enclosed the waste. With these baseline 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. As previously summarized in the DEIR, the analysis determined that under the 600-ton scenario, the intensity of odor required additional mitigation measures; however, the Proponent 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. As noted above, the Proponent will monitor the frequency at which 600 tons or more of MSW are stored overnight and, if necessary, implement additional odor controls such as carbon filters or a supplemental misting/odor counteractant system.

Air Quality

As previously detailed in the DEIR, the increase in project-generated truck trips as a result of the facility expansion will result in an approximately five percent increase in 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 in the traffic analysis; however, emissions would remain below existing conditions

since future roadway conditions are expected to improve with changes in engine technology. The estimated increase in emissions is in comparison to a No Build scenario which includes an increase in background traffic volumes in the traffic study area (without truck trips generated by the proposed increase from 1,000 tpd to 1,500 tpd). Total estimated increases associated with the project were modest, and range from an increase of 0.0001 tons per year (tpy) for PM and 0.0026 tpy for NOx.

The emissions estimates were prepared based on the assumption that the project will generate a total of 234 new daily truck trips; however, as noted above, the Proponent has committed to the use of rail in lieu of trucks (which will eliminate 128 of the 234 new truck trips) to minimize air emissions and impacts to traffic operations. Therefore, while both the traffic analysis and air quality analysis modeled as a worst case scenario—i.e., 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 because of the use of rail cars to transport waste off-site. Emissions estimates under Existing, No Build, and Build conditions were generated using the EPA's MOVES4 model, which accounts for reduced emissions from trucks due to mandated improvements to truck engine technology and includes emission rates for all types of trucks anticipated to be used to deliver waste to the site. As noted above, the Proponent will install charging stations for electric trucks should the fleet of trucks delivering waste to the site by the Proponent or clients using the site warrant their installation.

Mitigation and Draft Section 61 Findings

The FEIR includes a separate chapter summarizing proposed mitigation measures and includes draft Section 61 Findings. It contains commitments to implement these mitigation measures, identifies the parties responsible for implementation, and includes a schedule for implementation. As described in the FEIR, the Proponent has committed to implement the following measures to avoid, minimize and mitigate Damage to the Environment:

Environmental Justice

- Implement the PIP included in the FEIR, which includes ongoing public engagement through the DEP and Leominster BOH permitting processes, including providing updated information on the project website[5] and advance notice of permit hearings in both Spanish and English
- Implement a complaint response procedure
- Plant 15 shade trees at the project site to enhance the existing vegetated barrier around the site and mitigate the project's air quality impacts
- Continued exploration of monetary contributions to tree planting efforts by the Greening the Gateway Cities program and Growing Places
- Conduct weekly inspections, and trash pick-ups as necessary, along Tanzio Road
- Add magnets to street sweeper to pick up nails and screws along Tanzio Road
- Maintain impervious cover on all surfaces where facility operations occur and conduct regular sweeping of the site to minimize dust

[5] https://www.win-waste.com/about-us/locations/leominster-ma-200tanzio/#UMML

- Enforce anti-idling requirements on all vehicles at the site
- Enforce the existing prohibition on deliveries by uncovered trucks and trucks that park along Lancaster Street prior to the opening of the facility for waste deliveries
- Work with the City and the CSX railroad company to minimize traffic operations and safety concerns associated with rail crossings in the vicinity of the site
- Continue to use best management practices, such as keeping the loading bay doors closed, conducting waste handling within the building, using a misting system within the building, and covering loaded railcars with a spray-on coating to minimize noise and odor emissions
- Continue to transport all C&D and MSW off-site using rail to minimize truck traffic and associated emissions
- Maintain the existing stormwater management system so that it continues to meet the Stormwater Management Standards (SMS) and minimize water quality impacts

Transportation

- Minimize truck trips by using rail to transport C&D and MSW off-site
- Install electric charging stations for autos and trucks upon request by employees or should the fleet of trucks delivering waste to the site by the Proponent or clients using the site warrant their installation
- Assist the City to work with CSX to minimize disruptions at rail crossings

Noise

- The tipping doors are oriented away from the nearest residential receptors
- Handling and processing of materials would take place only inside the building
- Close at least one of the three overhead doors after 4:00
- 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
- Evaluate the need for modifications to the interior ventilation system, including the use of sound dampeners, or replacement of the system to minimize noise impacts
- Prohibit parking of trucks delivering waste to the site along Lancaster Street prior to the opening of the facility

Odor

- Conduct all waste handling within the building and keep the loading doors closed to the extent possible; all MSW will be handled (including during loadout activities) within the building

- Follow first-in, first-out protocols for moving MSW through the facility
- Maintain overhead door locations on the north side of the building, away from residential areas
- Limit overnight storage of MSW to 600 tons, or less if required by permitting agencies
- Maintain the use of a misting system with odor counteractants, which was upgraded in 2025 to increase coverage and dosing levels
- Cover the MSW in railcars with a CSX-approved covering, such as a lid, or posi-shell or other equivalent products which create a hard waterproof shell that entirely covers the waste within the rail car

Air Quality

- Minimize mobile-source emissions through the use of rail for off-site transport of MSW and C&D
- Use the existing electric processing line rather than converting to fossil-fuel powered processing line equipment
- Enforce anti-idling requirements on all vehicles at the site
- Plant at least 15 additional trees around the perimeter of the site
- Continued exploration of monetary contributions to tree planting efforts by the Greening the Gateway Cities program and Growing Places
- Maintain impervious cover on all surfaces where facility operations occur and conduct regular sweeping of the site to minimize dust

Adaptation and Resiliency

- As detailed in the DEIR, the existing stormwater management system, which is not proposed to be modified because no new buildings or impervious surfaces are proposed, meets the requirements of the SMS
- As detailed in the DEIR, one of the three infiltration systems at the site has the capacity to handle flows from the 2070 25- and 100-year storm events, and the other two infiltration systems will be modified in the future in response to larger storms
- The site elevation is approximately 10 ft above the existing BFE in the adjacent floodplains and the present-day 500-year floodplain does not extend onto the site

Conclusion

Based on a review of the FEIR and consultation with Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. Participating Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

May 1, 2026
Date

Rebecca L. Tepper

Comments received

04/09/2026	Craig Long
04/10/2026	Gary LeBlanc
04/19/2026	Frank Bangrazi, Sr.
04/20/2026	The Bangrazi Family
04/22/2026	Maureen Allain
04/23/2026	Steven Allain
04/24/2026	Massachusetts Department of Environmental Protection (MassDEP)/Central Regional Office (CERO)
04/24/2026	Patricia Marcotte

RLT/AJS/ajs

Energy & Environmental Affairs
Public Comments Portal

alexander.strysky@mass.gov

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Comment Details

EEA #/MEPA ID
16878

Comments Submit Date
4-9-2026

Certificate Action Date
4-24-2026

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

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State
MASSACHUSETTS

Zip Code
01453

Organization
Leominster Fire

Affiliation Description
Municipality

Status
Opened

Comment Title or Subject

Topic: Blocking Streets

Comments

Segoe UI | 10 pt | Paragraph

Would this create longer times for streets to be blocked when moving the rail cars? Is it possible for the Fire Department to be notified of the street closing for responses by Fire apparatus?

Attachments

Update Status

Status

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From: Gary LeBlanc
To: Strysky, Alexander (EEA)
Subject: UMML increased waste handling
Date: Friday, April 10, 2026 4:50:57 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

My house is located at 299 Tanzio Road, one of the closest houses to the facility and I have a few concerns about the proposed waste increase:

1. What are the hours of operation?

2.The noise that comes from the facility is very loud and sometimes makes my entire house shake.

3. The traffic on Lancaster Street is very heavy at times and the proposed increase will bring in approximately 200 trucks a day or more to the facility.

4.The trash escaping from the waste trucks can be seen on Tanzio Road and Lancaster Street.Sometimes there is waste odor from the trucks and facility.

5. The increased waste will need more trains to pick it up and add more noise.

In closing I am not in favor of the proposal.

Sincerely,

Gary LeBlanc

From: Frank Bangrazi
To: Strysky, Alexander (EEA)
Subject: Public Comment re UMM of Leominster
Date: Sunday, April 19, 2026 1:42:23 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

This email is in regards to the proposed increase of waste handling by UMML of Tanzio Road in Leominster. My name is Frank Bangrazi, Sr. My son resides at 27 Calza St. in Leominster. His residence is approximately 700 feet south west of the transfer station. Since the transfer station has been in operation, the immediate area around his home has been exposed to a strong odor of garbage or a chemical smell with the garbage odor as well noise outside of operational working hours, making outdoor activities unpleasant. The operation is a nuisance. My son and I have contacted Mayor Mazzarella's office as well as Leominster Health Department several times. We have also emailed James McQuade and spoken to him on the phone. He informed me that the smell could not leave the property and UMML would be fined if it did. It is my understanding after speaking with UMML management staff that UMML has not been fined. Nor have air quality or noise level tests been done in over a year. I was assured by the previous owner of the transfer station, Scott Lemay, that the building would be equipped with sound absorption panels. At the June meeting at the Franco Vets, the manager of the transfer station told me that it would be done. To my knowledge, this has not been done. I was also assured the rail cars carrying trash would be sealed. I have observed rail cars with trash not covered or sealed. In particular, on April 19, 2026, there were 6 fully loaded railcars parked in the holding area on the side of the transfer station not covered with a sealing material that I was told at the June, 2025 meeting would be used. I have asked UMML management if they use filters over the exhaust fans and I was told they do and that they are periodically changed. The outside walls where the fans are located is covered with a large amount of dust particles showing that it is escaping from inside the building. There is a hole in the building that is not covered on that same side of the building. I have been told that misters are on all the time but I have observed that this is not the case.I have been in contact with Matt Travis, the onsite operator of the transfer station when we are experiencing odors and he increases the odor control application which has a chemical smell that mixes with the garbage smell. I worry about the health effects of the aerosolized chemicals as well as the garbage. This operation has been a documented failure in keeping strong odors from leaving the property. With the summer months coming the intake of additional trash will add to the existing problem we are dealing with now.

At the meeting in June, 2025 at the Franco Veterans Hall in Leominster, I spoke out

against this same proposal and I reiterate my stance that this operation should not take any more waste as it has already affected the quality of life in this neighborhood. Please don’t hesitate to contact me if you have questions or comments for me.

From: Gmail
To: Strysky, Alexander (EEA)
Subject: UMML Transfer Station Leominster
Date: Monday, April 20, 2026 11:56:13 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

My name is Frank Bangrazi Jr. and I live with my wife and infant daughter at 27 Calza Street in Leominster which is very close to the transfer station on Tanzio Road. This facility has been a nuisance since it was built, and we are very disappointed with the proposed increase in waste processing as they cannot currently ethically and responsibly handle the waste without making the entire neighborhood smell like garbage. We were promised by multiple city officials in the preliminary meetings for this facility that we would never smell anything or have any issues with odor or noise, and this has been far from the truth.

Our main concern is the air quality in the surrounding area, especially now that we have an infant daughter at home who is now being exposed to this air in addition the the chemicals they put in the misters to help prevent the smell. These misters are incredibly ineffective when garbage is sitting in the open, unsealed carts waiting to be picked up, and the smell is exceedingly offensive on days when they are processing more waste than normal. Some days it can be smelled as far away from the facility as the intersection of Central Street and Litchfield Street, before I even pull onto Calza Street.

Have any air quality studies been done in the surrounding area since this facility was built in order to prove that it is not adversely affecting the air quality? We would like some assurance that this facility is not going to harm our daughter and that the chemicals used in the misters have been proven to be safe with no adverse effects after long term exposure. We are vehemently against the proposal to increase waste at this facility, and we are begging you to please do the right thing and fix these issues before considering an increase in waste processing.

Thank You,
The Bangrazi Family
27 Calza Street
Leominster, MA 01453

From: maureenttv@aol.com
To: Strysky, Alexander (EEA)
Subject: Transfer Station proposal for additional trucks
Date: Wednesday, April 22, 2026 10:01:15 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am submitting a letter in opposition to the proposal of additional tonnage on Tanzio Road in Leominster.

We moved to 644 Lancaster Street in 1996. Lancaster Street was a great location at the time. Then came the addition of the Transfer Station on Tanzio Road many years ago. I don't know why this location was chosen with residential housing nearby. This was the start of the HUGE increase in truck traffic on Lancaster Street. Originally it was thought that trucks would go to the transfer station coming from the Walmart side off the highway. This is NOT the case.

Lancaster St has NOT been paved since we moved in in 1996! The road should have been paved before the addition of the Transfer Station. Our house has been repaired and updated after the 2023 flood and after a drunk driver drove into our front steps in 2024. We love the way it looks now on the inside. And my husband finally got the first remote job he wanted in 2024. BUT outside our house the traffic is inconceivable. Our windows shake every time a truck drives by since the road conditions are decrepit. And now recently when regular cars drive by the windows shake. With over 10,000 vehicles driving by our house every day, that's a lot of shaking! And we have to pick up trash in our yard on a daily basis from the trash trucks driving by. This happens 7 days a week (less on Sundays) and there is no reprieve! I wake up in the middle of the night and hear the traffic! We don't open our windows because of the noise or our front blinds because all we see are trucks on the road and across the street.

PLEASE consider the residents on Highway 117! NO MORE TRUCKS!!!

Maureen Allain

Energy & Environmental Affairs
Public Comments Portal

alexander.strysky@mass.gov

View Comment

Comment Details

EEA #/MEPA ID
16878

Comments Submit Date
4-22-2026

Certificate Action Date
4-24-2026

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

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State
MASSACHUSETTS

Zip Code
01453

Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Transfer Station proposal for additional tonnage

Comments

We moved to Lancaster St in 1996. This was a great location at the time. Then the Transfer Station was added about 5 years ago. I don't know why it was approved to be built on Tanzio Road with residents living in the area where the trucks are driving by. It was thought that the trucks would come from the Rt 190 side of the city, but the trash trucks drive by our house every day.

And Lancaster Street has not been paved since we moved in 1996! This street should've been repaired before the huge increase in truck traffic! The road conditions are decrepit.

Now every time a truck drives by, our windows shake & our dishes shake in our cabinets. And we have to pick up trash in our yard on a daily basis.

PLEASE, NO MORE TRUCKS on Lancaster Street!

Maureen Allain

Attachments

Update Status

Status

Opened

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BACK TO SEARCH RESULTS

From:	Steven Allain
To:	Strysky, Alexander (EEA)
Subject:	MEPA FEIR UMML update from 1,000 tons to 1,500 comments.
Date:	Thursday, April 23, 2026 3:55:14 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

My name is Steven Allain, I am submitting my opinion against the increased volume of waste from 1,000 tons per day (TPD) to 1,500 TPD at United Material Management of Leominster. This is not my first submittal.

This increase does not provide any benefit to the area residents. From the DRAFT ENVIRONMENTAL IMPACT REPORT dated 07NOV25, currently there are 216 truck trips that container vehicles use on Lancaster Street per day. This project will add to 320 trucks per day. For someone who does not live within the vicinity an increase of vehicles does not matter. For the area residents it is a major noise, vehicle speeding and house shaking problem. There is zero signage that states there is a train recycling center in the area.

There is a distinct BANGING sound when an empty container truck goes over a bump in the road and there are a lot of bumps on Lancaster Street. The speed limit is 35 miles an hour, that sound increases with a truck traveling at 40 mph.

Traffic will already be increasing in this area because there is 250+ housing units being built on the corner of Elm Hill Ave and Lancaster St., less 1 mile north on Lancaster Street which will increase traffic with new residence.

I am wondering if your office or any local committee member has ever spent time on any part of the Lancaster street between Tanzio Rd and Viscoloid Ave. Do you just receive an application for a DEIR, the money to submit the application and approve or disapprove according to how many people give feedback or do you go to the site making the request and spend time in the neighborhood of the families that are directly affected.

There are no signs that state there is a train recycling center in the neighborhood. There are no traffic “entering” signs around the Tanzio Rd area. Since the opening of UMML there has not been any community development programs sponsored by the company or some type of discount for the residents that are daily affected.

My main concern is the recycle center opened in 2018 and now they want to increase tonnage after 8 years. What is going to happen in another three to five years when more landfills close, will they want to increase another 500 to 1000 tons and how many times will they want to increase in the future. Again, it is not going to affect anyone negatively, accept the residence that live in the route of the trucks.

Another point to consider is RT 2 commuters rely on Navigation Apps like Google Maps, Apple Maps or Ways. If there is a delay, traffic or an accident the Navigation App uses Rt 117(Lancaster street) from Viscoloid St to Rt 190 as an alternate rt.

To close, how would you feel and what you do if every day you are woken up by your house shaking by truck traffic and there is a proposal to add more to the area.

Regards, A concerned citizen of Leominster.

Steven Allain

The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 8 New Bond Street, Worcester MA 01606
Phone: 508-792-7650

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

April 24, 2026

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

Attention: MEPA Unit – Alexander Strysky

Re: Final Environmental Impact Report (FEIR)
WIN Waste Innovations of Northern New England, Inc Transfer Station (Formerly United Materials Management of Leominster)
Leominster
EEA #16878

Dear Secretary Tepper,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the ENF for the WIN Waste Innovations of Northern New England, Inc Transfer Station (Formerly United Materials Management of Leominster) Project (the "Project")). WIN Waste Innovations of Northern New England, Inc (Formerly United Materials 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 solid waste handling building with 1,260 square feet (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 was required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because the Project is located within a Designated Geographic Area around one or more Environmental Justice populations. MassDEP offers the following comments:

Solid Waste

The Certificate on the DEIR (the "Certificate") required the FEIR to describe the activities conducted at the facility outside of waste acceptance hours under existing and proposed conditions. The Certificate also required the FEIR to clarify what the anticipated operating hours of the facility will be and how that differs from the approved waste acceptance hours.

The Proponent provided information about the permitted waste acceptance hours (from 6:00 am to 7:00 pm on weekdays and from 7:00 am to 3:00 pm on weekends) as well as activities that occur outside those hours. The FEIR states that "the Facility has identified "Posted Waste Delivery Hours" to be 6:30 am to 3:30 pm (weekdays) and 7 am to 11:30 am (Saturday), which is within the Permitted Hours. These "Posted Waste Delivery Hours" are applicable to third-party vendors. Company deliveries (internal) may arrive outside of the Posted Waste Delivery Hours, but must be within the Permitted Hours." Beyond permitted hours, waste is not accepted. The FEIR further states that although the facility is not

currently restricted from conducting necessary operations outside waste acceptance hours, during those times the use of equipment on both the interior and exterior of the building is greatly decreased, which reduces overall noise-generating activities. The FEIR adequately addresses this issue.

Odor

The DEIR states that there is no change in overnight storage volume (600 tons of Municipal Solid Waste (MSW)). The Proponent provided an evaluation of storage capacity within the building, which shows that there is ample storage and processing space to accommodate the proposed 1,500 tons per day.

The Certificate required the FEIR to provide additional details about the supplemental odor analysis in the DEIR. The Odor Studies included in the ENF and DEIR indicate a potential for odors during warmer months with increased storage. The FEIR discussed the assumptions used in the odor study provided in the DEIR and how the results were evaluated. The FEIR says that the "modeling concluded that with an average of approximately 150 tons on the floor overnight, no additional odor control is required. Even at 600 tons per day of MSW stored overnight, potential impacts remain acceptable in terms of frequency, duration, intensity, and tone." The facility will monitor overnight MSW storage and determine if additional modeling and/or controls are needed. If the monitoring finds that odors are not sufficiently controlled, MassDEP may require additional controls be put in place.

Air Quality

In its comments on the DEIR, MassDEP requested that the Proponent explain why it might not be feasible to operate the misting system in the facility at all times during waste acceptance hours. The FEIR explains that the misting system cannot operate during winter months due to freezing temperatures and an unheated building which poses safety concerns for the employees, and offers alternative measures for odor and dust control. The Proponent plans to use handheld hoses for dust suppression on extra dusty loads, close doors if a load is anticipated to be dusty, tip dusty loads further into the building, away from the doors, and follow first in-first out MSW procedures to reduce MSW storage time. In addition, MassDEP believes improvements in technologies will allow for better management of dust and odors. In the SW07 Modification of a Large Handling Facility Permit Approval a permit condition will require a dust mitigation system to be operated year-round during operating hours. MassDEP will review odor controls proposed

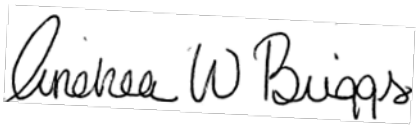
The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 8 New Bond St. Worcester MA 01606
Phone: 508-792-7650

in the permit and may require additional technologies/controls for odor control beyond handheld hoses and the other alternative measures listed in the FEIR.

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,



Andrea Briggs
Acting Regional Director

cc: Commissioner's Office, MassDEP

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alexander.strysky@mass.gov

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State
MASSACHUSETTS

Zip Code
--

Organization
--

Affiliation Description
--

Status
Opened

Comment Title or Subject

Topic: Objection to Expanded Tonnage Processing

Comments

Having looked at the proposal and mitigation ideas, I strongly oppose approving the expansion of the tonnage allowed at this site. The neighborhood already struggles with noise, traffic, and foul odors. It is inappropriate to be siting this operation at this scale so close to residences. It is simply not healthy and not fair to put this burden on this community. Please deny this expansion.

Attachments

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