FINAL ENVIRONMENTAL IMPACT REPORT (FEIR)

Massachusetts Environmental Policy Act

Project:

WIN Waste Innovations of Northern New England, Inc.
Transfer Station
formerly United Material Management of Leominster
200 Tanzio Road
Leominster, Massachusetts 01453

EEA#16878

February 2026

Applicant/Owner:
WIN Waste Innovations
90 Arboretum Drive, Suite 300
Portsmouth, NH 03801

Green Seal Environmental, LLC

114 State Road, Sagamore Beach, MA 02562 | Tel: (508) 888-6034 | Fax: (508) 888-1506 | www.gseenv.com

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1. Overview

1.1 Project Overview

The project consists of a tonnage increase for the existing United Material Management of Leominster solid waste transfer station located at 200 Tanzio Road, Leominster, Massachusetts (the Facility). This Facility was originally reviewed by MEPA in 2018 under EEA #16878. On behalf of United Material Management of Leominster, LLC (UMML) Green Seal Environmental, LLC (GSE) prepared an Environmental Notification Form (ENF) for the proposed project in 2024 and a Draft Environmental Impact Report (DEIR) in 2025. This Final Environmental Impact Report is being submitted following the issuance of the DEIR Certificate as further described below.

1.2 Secretaries Certificate(s)

The ENF was noticed in the Environmental Monitor on September 25, 2024. After a review and comment period, a Certificate (EEA#16878) was issued by the Secretary of the Executive Office of Energy and Environmental Affairs on December 9, 2024. The DEIR was noticed in the Environmental Monitor on September 10, 2025. After a review and comment period, a DEIR Certificate was issued on November 7, 2025. Copies of the Secretaries Certificates are included as Attachment 1.

1.3 FEIR Format

This FEIR has been developed in accordance with the format provided at 301 CMR 11.07(6) (the MEPA Regulations) with consideration of the scope presented in the DEIR Certificate. A separate section in the FEIR has been provided for each of the categories/sections identified in the MEPA Regulations and/or as amended by the MEPA DEIR Certificate. The FEIR is limited in content per the scope in the DEIR Certificate however, this filing contains some background and contextual information for cohesiveness. Where appropriate, summaries of previously-provided information have been included. This FEIR, in conjunction with the DEIR, provides a complete description and analysis of the Project.

Per the DEIR Certificate, the scope of the FEIR focuses on the following topics:

- Project Description and Permitting Update
- Environmental Justice/Public Health
- Solid Waste
- Odor
- Air quality
- Mitigation and Draft Section 61 Findings
- Responses to Comments

2.Project Summary

2.1 Project Information

- Project Name: United Material Management of Leominster
- EEA#: 16878
- Project Description: Increase the daily capacity of the existing transfer station from 1,000 tons per day (tpd) to 1,500 tpd.

2.2 Project Changes since DEIR

No changes to the proposed Project have occurred since the review of the DEIR. However, the Facility name has been changed with MassDEP to WIN Waste Innovations of Northern New England, Inc, Transfer Station, effective February 4, 2026.
For purposes of this application and Final Certificate, please indicate the following project name and proponent on the FEIR Certificate to be:

Project Name: WIN Waste Innovations of Northern New England, Inc. Transfer Station (formerly United Material Management of Leominster)

Project Proponent: WIN Waste Innovations of Northern New England, Inc. (formerly United Material Management of Leominster, LLC)

2.3 Summary of Permits

Following the MEPA process, two additional permits will be required:

- Minor Modification to Site Assignment, Leominster Board of Health
- Modification of a Large Handling Facility, BWP SW 07, MassDEP Solid Waste

In preparation of the Site Assignment modification, the City engaged third-party consultants to perform limited traffic, sound, and odor studies to verify conditions reported in the studies conducted by the Facility as part of the Project. These studies have been completed and will be further reviewed and discussed as part of the future Site Assignment modification process. Where analyses parameters were similar, the studies generally match the data and conclusions presented as part of the Project. Site Assignment hearings will commence after the MEPA process is concluded. Site Assignment hearings will be conducted in accordance with 310 CMR 16.00, which includes evaluation of the project in accordance with the site suitability criteria at 310 CMR 16.40 which was presented in the ENF.

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2.Project Summary, Continued

2.3 Summary of Permits, Continued

The permit application to MassDEP will be submitted after the completion of the Site Assignment modification process with the City. The permit application will follow and include pertinent information per the BWP SW 07 permit application form and will address performance standards and requirements for handling facilities per 310 CMR 19.000.

Further discussion on the third-party traffic and odor studies conducted for the City are provided in their respective sections (6.3.3 and 6.5.5) herein.

2.4 Summary of Project Alternatives

The DEIR included an expanded alternatives analysis that evaluated No Build and the alternatives presented in the 2023 ENF (Alternatives 1 & 2), the sites evaluated in the prior 2018 ENF (Alternatives 3 & 4), and new site(s) (Alternative 5 & 6):

1. The existing Leominster Facility (preferred alternative)
2. Expansion at the existing UMM Millbury Facility in Millbury
3. Expansion at the existing Waste Management Facility in Leominster
4. Development of new facility at a vacant parcel in Leominster
5. Expansion at the existing AKS Facility in Fitchburg
6. Development of a new facility outside of an Environmental Justice area.

No additional alternative analysis scope was included in the DEIR Certificate.

2.5 Summary of Potential Impacts

As identified in the MEPA Certificate, potential impacts include the following:

- Noise
- Odor
- Emissions
- Traffic

2.6 Summary of Measures to Avoid or Minimize Damage

As identified in the ENF, the Facility uses Best Management Practices to minimize potential impacts to the Site and surrounding environment. The following BMPs are implemented at the Facility:

- All tipping, handling, and loading is performed within a fully-enclosed waste handling building.
- Use of a fine atomized misting system within the Waste Handling Building effectively controls fugitive dust and odor.

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2.Project Summary, Continued

2.6 Summary of Measures to Avoid or Minimize Damage, continued

- The building floor is impervious concrete that will prevent any potential contact with or contamination of groundwater. Any liquids released from the waste is collected in an interior floor drain system. The liquid collected in this system is routed through an oil/water separator and discharged to the sanitary sewer system pursuant to their existing discharge permit.
- Utilize overhead doors to contain any excessive dusty or odorous materials that may be delivered.
- Regular daily cleanup and sweeping occurs on the external paved surfaces to mitigate any dust or windblown litter.
- Enhanced stormwater controls that meet or exceed MassDEP Stormwater Standards to minimize impacts to stormwater.
- Use of rail for exportation of materials, effectively reducing diesel-related emissions.

2.7 Summary of Mitigation Measures

UMML has identified the following mitigation measures to reduce potential impacts due to the tonnage increase:

- Close one overhead tipping door during operations after 4 pm to reduce noise impacts to nearby receptors.
- Limit MSW tonnage to 600 tons on the floor overnight.
- Install enhanced filters on existing air ventilation system to reduce potential odors and/or dust. Filtration may include the addition of coarse particulate filters.
- Plant additional trees on site to mitigate carbon impacts.
- Work with City to install new signage on Malburn Street to provide notice and discourage any trucks (new to facility) from traveling through the residential neighborhood.
- Evaluate potential modifications to the existing air handling units to reduce noise.
- Modify existing misting system to increase odor counteractant application and efficiency (completed).
- Based on need (waste storage volumes), the Facility may also add carbon filtration to increase odor control.

3.Project Description

3.1 Existing Conditions

The 13.46-acre existing project site is located on the west side of Tanzio Road in an industrial area in southeastern Leominster. 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. A site Locus Plan is included in Attachment 2 as Sheet EX-1. The Site is shown on C-1 included in Attachment 2.

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. EJ Populations are shown on EX-5 in Attachment 2.

Currently the facility is permitted to accept up to 1,000 tons per day (tpd) of solid waste including municipal solid waste and construction and demolition debris (C&D). Waste handling occurs inside an existing 32,400 square foot (sf) handling building that includes a dedicated rail loadout bay, three tipping doors, and a material processing line that separates out recyclable material from the C&D waste stream. There are two scales on site to serve inbound and outbound vehicles which minimizes time vehicles are on site and potentially idling, thereby reducing emissions on site.

Refer to site plans included herein as Attachment 2. No changes to the site plans have been made since the DEIR, except for the most recent changes by FEMA to mapped floodplain shown on Figure 2 included within the plan set as Attachment 2.

Continued on next page

3.Project Description, Continued

3.2 Objectives and Benefits

The objectives and benefits of the project include the following:

- Increase available waste handling (as conduit to disposal facilities) and recycling capabilities in the region as in-state capacity continues to decrease and forces out-of-state disposal.
- Use existing infrastructure minimizing construction impacts.
- Use rail infrastructure which is 4 times as efficient as trucking, reducing potential diesel emissions and traffic.

3.3 Proposed Conditions

This Project is for the increase of the allowable daily accepted tonnage. No construction is proposed as part of this project. Handling of the increased tonnage will occur within previously constructed/existing site infrastructure.

3.4 Planning Consistency

The Project is designed to utilize existing site infrastructure and will have no construction-related impacts. This includes using all existing access roads, rail infrastructure, stormwater management features, buildings, and utilities. The DEIR presented the project's consistency with the Massachusetts Solid Waste Master Plan, the regional Montachusett Master Plan, and the Leominster Master Plan. No changes to the project have been made since the DEIR and the DEIR Certificate did not identify any additional scope related to Planning Consistency.

4.Alternatives to the Project

4.1 Summary of Alternatives

The project is proposed to meet increasing demand for MSW and C&D waste disposal in Massachusetts. According to MassDEP, solid waste transfer facilities are necessary to divert and dispose of waste to conserve the state's declining landfill capacity. The ENF included an alternatives analysis that evaluated No Build and Millbury Facility Expansion Alternatives. The MEPA Certificate required the DEIR evaluate the alternatives presented in the 2023 ENF (Alternatives 1 & 2), the sites evaluated in the prior 2018 ENF (Alternatives 3 & 4), and new sites (Alternatives 5 & 6):

1. The existing Leominster Facility (Preferred Alternative)
2. Expansion at the existing UMM Millbury Facility in Millbury
3. Development of new facility at parcel 320-1E in Leominster
4. Expansion at the existing Waste Management Facility in Leominster
5. Expansion at the existing AKS Facility in Fitchburg
6. Development of new facility outside of an EJ area, in the Leominster vicinity. The DEIR selected the property adjacent to the Sterling Landfill as the sixth alternative.

The DEIR presented and evaluated the above alternative sites for access, suitability, potential impacts, and overall location. The DEIR Certificate did not identify any additional scope in regards to further assessment of alternatives.

5.Existing Environment

5.1 Overview

In accordance with 310 CMR 10.11.10 (6), this Existing Environment section provides a description and analysis of the physical, biological, chemical, economic, and social conditions of the Project site, its immediate surroundings, and the region (in sufficient detail to provide a baseline in relation to which the Project and its alternatives can be described and analyzed and its potential environmental and public health impacts and mitigation measures can be assessed). Topics that were addressed in the DEIR included the following:

1. Topography, geology, and soils;
2. Surface and groundwater hydrology and quality;
3. Air quality, GHG emissions, and noise;
4. Plant and animal species and habitat;
5. Traffic, transit, and pedestrian and bicycle transportation;
6. Scenic qualities, open space, and recreational resources;
7. Historic structures or Districts, and Archaeological Sites;
8. The built environment, human use of the Project site, and its immediate surroundings;
9. Rare or unique features; and,
10. Publicly available data on public health conditions in the immediate vicinity of the Project site.

    Note: the Project site is not located in tidelands or locked tidelands, so those topics do not apply to this EIR.

The DEIR presented a description and analysis of the above referenced topics. The DEIR Certificate did not identify any additional scope in regards to further assessment of the existing environment.

No changes to the existing environment, in terms of the ten topics above, has occurred since submittal of the DEIR in August 2025 except as noted below:

- The FEMA flood map for the site was updated with effective date of 7/8/2025. No significant changes to the mapped floodplain were noted that would impact the site or Project. The developed portion of the Facility remains well outside and above the mapped floodplain. EX-2 in Attachment 2 has been updated to reflect the revised floodplain based on MassGIS data.

6. Impacts

6.0 Overview

The MEPA Regulations at 301 CMR 11.07(6) (the MEPA Regulations) require an assessment of impacts. As such, the DEIR presented an assessment of impacts by topic in Report Section 6, which included the following:

- 6.1 Solid Waste
- 6.2 Environmental Justice
- 6.3 Transportation/Traffic
- 6.4 Greenhouse Gas Emissions
- 6.5 Noise
- 6.6 Air Quality
- 6.7 Odor
- 6.8 Construction period (n/a)

Per the DEIR Certificate, the scope of the FEIR focuses on the following subset of topics:

- Solid Waste
- Environmental Justice/Public Health
- Air Quality
- Odor

Although the DEIR Certificate does not include any required scope related to traffic, the FEIR includes a traffic section in order to respond to public comments regarding general traffic on Lancaster Street. This traffic section is included as Report Section 6.5 Impacts-Traffic.

The following report sections (6.1 through 6.5) correspond to the FEIR scope topics and provide additional information as requested in the DEIR Certificate to supplement the information already provided in the DEIR:

6.1 Solid Waste
6.2 Environmental Justice/Public Health
6.3 Air Quality
6.4 Odor
6.5 Traffic

6.1 Impacts-Solid Waste

6.1.1 Overview

The UMM Leominster Transfer Station is a MassDEP-permitted solid waste handling facility with valid solid waste permits to accept and handle up to 1,000 tons per day of solid waste. A minor modification to the existing Site Assignment from the Leominster Board of Health and a modification to the existing solid waste Authorization to Operate (ATO) permit (BWP SW 07) from MassDEP will be required for the proposed tonnage expansion to 1,500 tons per day.

The capacity increase of 500 tons per day triggers MEPA review as the solid waste threshold at 301 CMR 11.03 (9)(b)(1) is exceeded. A mandatory ENF is required for the tonnage increase, and an EIR is required because the Facility is located within one mile of an Environmental Justice community.

6.1.2 Summary of DEIR

The ENF and DEIR presented the Site Suitability Criteria which regulates and determines whether a location or existing Facility is "suitable" to handle solid waste per the Massachusetts Site Assignment Regulations at 310 CMR 16.00.

The Draft Site Suitability Report included in the ENF outlined each of the siting criteria and described how the Project complies with each criterion. Most of the siting criteria provides protections to the environment (i.e., establishing minimum distances to rivers and drinking water sources, etc.) and to nearby receptors (i.e., nuisance condition controls, minimum distances to residential dwellings, daycares, and schools, etc.). No site shall be determined to be suitable or be assigned as a solid waste management facility where the establishment or operation of the facility would result in nuisance conditions which would constitute a danger to the public health, safety, or the environment.

As these siting criteria focus on protections, the Facility was and is designed to mitigate for and control potential nuisance conditions such as noise, dust, odor, etc. Operational controls (e.g., misting system, air handling system, building envelope, etc.) coupled with Best Management Practices (street sweeping, loadout procedures, good housekeeping, etc.) provide mitigating measures to control potential nuisance conditions and maintain the Facility in accordance with its permits.

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6.1 Impacts-Solid Waste, Continued

6.1.3 FEIR Scope

The DEIR Certificate identified the following scope for inclusion in the FEIR related to Solid Waste:

1. The FEIR should describe the existing and proposed activities conducted by the Proponent within the two identified time periods: permitted hours and posted waste delivery hours.
2. The FEIR should confirm the tonnage limits to be requested for daily operations and for overnight storage. The FEIR shall estimate the remaining capacity of the Facility after the daily tonnage is increased to 1500 tons and identify any changes that would be needed to accommodate more than 1,500 tpd.
3. The FEIR should include commitment to the use of rail for off-site transport and discuss whether future permits will require the use of rail.

6.1.4 Operating Hours

The Facility is permitted to accept waste from 6 am to 7 pm on weekdays and from 7 am to 3 pm on weekends per the current site assignment and operating permit ("Permitted Hours"). In these time periods, the Facility is allowed (permitted) to accept and tip waste within the handling building.

Currently, 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.

At times outside of the Permitted Hours, the Facility may not accept inbound waste. However, the Facility is not currently otherwise restricted from conducting any other necessary operations (housekeeping, railcar or truck loadout, maintenance) outside of these hours. It is noted that during the time outside the Permitted hours, the use of equipment inside and outside of the handling building is greatly reduced thereby reducing overall noise-generating activities.

The Facility conducts all other necessary daily activities such as material management, processing, loadout, street sweeping, and minor equipment maintenance, etc., generally within the Permitted Hours.

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6.1 Impacts-Solid Waste, Continued

6.1.5 Capacity and Storage Limits

The Project as proposed does not include any construction or expansion of on-site buildings or infrastructure, as the increased daily tonnage can be handled within the 32,500-sf (approximate) handling building. Current daily limits on waste types are 1,000 tons combined MSW and C&D. The Facility cannot predict day to day ratios of inbound waste based on waste type as it is constantly variable.

As identified in the DEIR and earlier in the Draft Site Suitability Report included within the ENF and shown on Figure 6 of the appended plan set, the handling building 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 tipping and loadout areas. This equates to storage of 3 days of full inbound capacity, and is adequate storage space. At 1,500 tons per day, handling and storage area would equate to 2 days of full inbound capacity which is also adequate storage space. Based upon these storage volumes, the Facility could receive up to 3,000 tpd and have enough space to store that daily tonnage plus receiving and operational space, thereby estimating the remaining capacity after this 500-ton increase as 1,500 additional tons per day. The Facility is not requesting any type of increased storage volumes at this time.

In accordance with the Facility's Authorization to Operate Permit (ATO), maximum quantities of material that can be stored on the tipping floor within the handling building overnight are limited to the following quantities:

- C&D (Category 1) - 375 tons (1,500 cy)
- C&D residuals and bulky waste (Categories 2 & 3)- 1,000 tons (2,000 cy)
- MSW- 600 tons (2,400 cy)
- Rejected items- 60 cy

The Facility strives to move materials through the Facility as efficiently and quickly as possible, which includes minimizing any stockpiles at the end of the working day. However, many factors contribute to normal daily operations and it is not uncommon to have stockpiles of materials staged for morning loadout. As indicated above, the current permit identifies limits to these overnight stockpiled materials.

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6.1 Impacts-Solid Waste, Continued

6.1.5 Capacity and Storage Limits, Continued

The Odor Study(ies) included in the ENF and DEIR analyzed odor potential with the use of the existing misting system and under summertime weather conditions to estimate the worst-case potential odor loading scenario which could occur in the warmer months. 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. Under maximum summer odor potential conditions, the preferred (acceptable) hourly odor threshold could be exceeded, but only for short durations. Modeling indicates detectability approximately 5% of the time, and only under the combined assumptions that (1) 600 tons per day are continuously maintained on the floor overnight and (2) odor generation remains at peak summer conditions at all times, which is an unrealistic long-term average scenario.

Therefore, in order to determine if additional odor control will be necessary, the Facility will monitor overnight MSW storage and determine frequency at which MSW overnight storage approaches 600 tons. If this occurrence is consistently greater than 50% of the time (between May and September) and greater than 75% of the time during other months, odor monitoring will be conducted to assess if off-site impacts are occurring. Any confirmed odor complaints will also be considered as part of the overall assessment and evaluation of additional odor controls. As indicated in the odor study, additional controls to be considered include adding carbon filters to existing air handling system, adding circulating carbon units within the building, or adding a targeted supplemental misting/odor counteractant system for just the MSW stockpile area(s).

Daily limits on specific waste types are not proposed at this time as intent of tonnage increase is to accommodate market fluctuations throughout the year (the influx of materials during the busy seasons) which can include both C&D and MSW.

6.1.6 Use of Rail

As presented in the ENF and DEIR, the Facility is served by rail which is used as the primary transportation method of outbound materials to end disposal outlets. As Massachusetts disposal capacity is dwindling with no in-state solution identified, export to other states will continue for the foreseeable future. Rail is currently the most cost-effective and fuel-efficient mode of long-haul transport. The Facility commits to using this method of transportation for disposal, as available.

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6.1 Impacts-Solid Waste, Continued

6.1.6 Use of Rail, Continued

As the rail service is controlled by another entity, the Facility must have alternative disposal methods available for use if there is a disruption in service. The Facility must be able to loadout materials to prevent nuisance conditions (i.e., odor) from occurring and to continue the normal throughput of materials so as not to create a back-up in the region by diverting waste elsewhere to other locations that may or may not have capacity while creating more vehicle miles and emissions.

Impact studies conducted as part of this project assess a worst-case scenario of truck transport only and no use of rail to be conservative and to account for a potential condition of disrupted rail service. As presented in the DEIR, no significant impacts to traffic or air quality results from this Project.

6.2 Impacts-Environmental Justice and Public Health

6.2.1 Overview

The Environmental Justice (EJ) and Public Health component of the Final Environmental Impact Report (FEIR) provides supplemental information as requested by MEPA in the DEIR Certificate regarding outreach and response measures, and feasible mitigation measures within EJ populations.

As the Project is within an EJ Area, enhanced public outreach is a component of the Project permitting. The Project's submitted Environmental Notification Form (ENF) included a Public Involvement Plan which was updated and included in the DEIR. Updates to the PIP as requested in the MEPA DEIR Certificate were incorporated into the PIP (see Attachment 3). As part of the DEIR Certificate, the Project must continue to provide public outreach for the Project to EJ populations in Leominster and those who commented on the DEIR.

6.2.2 Summary of DEIR

The DEIR presented existing public health data for the areas within the EJ populations and sources of potential pollution within the 1-mile Designated Geographic Area (DGA) as provided by the Massachusetts Department of Health. This data was used in a baseline assessment of existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations. As outlined in the MEPA Interim Protocol, health criteria exceeding the 110% statewide rate could be viewed as exhibiting "vulnerable health EJ criteria," and therefore, potentially bearing an "unfair or inequitable" environmental burden and related public health consequences.

The DEIR also reviewed air quality indicators and provided a mesoscale air quality analysis, which was presented in the Air Quality section of the DEIR and addressed in Section 6.3 of this FEIR. A Greenhouse Gas (GHG) analysis was also provided in the DEIR.

6.2.3 FEIR Scope

The DEIR Certificate identified the following scope for inclusion in the FEIR related to Environmental Justice/ Public Health:

1. The FEIR should include an updated PIP.
2. The FEIR should provide a detailed description of the Proponents procedures for receiving and responding to complaints.
3. The FEIR should include an update on efforts to respond to community comments and complaints, specifically related to truck routing controls, noise, and odor mitigation efforts, and railroad crossing traffic control.

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6.2 Impacts-Environmental Justice and Public Health, Continued

6.2.3 FEIR Scope, Continued

4. The FEIR should quantify the number of trees proposed to be planted to increase the vegetative barrier around the site.
5. The FEIR should continue to explore feasible mitigation measures to address cumulative air quality impacts on environmental justice communities.

6.2.4 Updated PIP

The PIP was revised to reflect any changes or updates to the distribution list, engagement methods, public review opportunities, and involvement strategies, as applicable and available. A copy of the updated PIP is included as Attachment 3.

6.2.5 Complaint Response

The Facility has the following procedure for receiving and responding to complaints. The actual steps involved may change depending on how the complaint is initially received. Most complaints are received from the Board of Health and/or MassDEP either by email or telephone.

1. Investigate conditions of complaint. Investigation typically will involve a member from the Board of Health and/or MassDEP going to complainant's location, then go to the Facility. The Facility investigates conditions at the Facility.
2. Correct and/or mitigate condition if complaint condition is confirmed and founded.
3. Notify BOH (if not source [notifier] of complaint or otherwise initially copied/notified).
4. Notify MassDEP, Solid Waste department within 24 hours if confirmed complaint condition is an incident or disruption that could affect public health, safety, environment, or operation of the facility (if not source [notifier] of complaint or otherwise initially copied/notified).
5. Conduct any follow-up actions necessary.
6. Record incident in complaint log electronically kept in company's environmental health and safety software (or any equivalent tracking mechanism). Unsubstantiated and unconfirmed complaints are recorded as 'near misses' in the software (or any equivalent tracking mechanism).

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6.2 Impacts-Environmental Justice and Public Health, Continued

6.2.6 Update to Response Efforts

The DEIR identified public comments received and actions the Facility took to rectify and mitigate these conditions or issues immediately. The following paragraphs present an update on the efforts to respond to comments regarding truck routing controls, noise and odor mitigation efforts, and railroad crossing control, as requested in the DEIR Certificate.

- Since the submittal of the DEIR, no trucks using the Facility have been identified by the Facility (or reported to the Facility) for stopping along Lancaster Road. Facility employees are trained to issue warnings and notices to those who violate this policy.
- As identified in the DEIR, the misting system was previously modified to allow for increased odor counteractant application. One odor complaint was received in August (8/18/2025) since finalizing the DEIR for submittal, however none have been received since. The August complaint was investigated by the BOH and was unconfirmed.
- The Facility has facilitated conversation between CSX and the City regarding railroad crossing improvements. These conversations have clarified the process for permitting and implementation and what the next steps would be.
- No noise complaints have been received by the Facility since filing the DEIR.

6.2.7 Tree Planting

As described in the DEIR, the initial development of the facility in 2019 maintained the vegetated buffer to the south and enhanced the plantings (trees and shrubs) between the tree line and the limit of pavement to restore buffer zones to resource areas as well as provide visual buffer to the east and south. This buffer now maturing, may also reduce noise from idling trucks, and reduce concentrations of CO_2 in the vicinity of the Facility.

As a mitigation measure for reducing NO_2, CO_2, and carbon impacts, the Facility proposes to plant additional trees on site. Assessment of the site and consideration of the Riverfront Area Restoration plantings installed as part of initial development in 2020, it is estimated that approximately 15 native trees can be planted on site. Tree placement will be complementary to existing vegetation, maintain required stopping sight-distance at the entrance, maintain required CSX clearance to the rail lines, and not interfere with or encroach into the power easement located to the north of the site.

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6.2 Impacts-Environmental Justice and Public Health, Continued

6.2.8 Feasible Mitigation Measures for Cumulative Air Quality Impacts

The Facility continues to explore the feasibility of additional mitigation measures to address cumulative air quality impacts on the EJ community. As discussed in the Air Quality section, the Facility is amenable to installing EV chargers if it was requested by employees and/or clients utilizing the Facility that owned heavy duty electric vehicles and/or if the Facility itself added any electric vehicles to their fleet.

As noted in the previous section (6.2.7) the Facility has committed to planting additional trees on site which is located within an EJ area. The addition of trees will help reduce NO_2 in the area (and other pollutants: O_3, SO_2, CO, PM_{10}[1]) by their ability to adsorb it as part of the normal gas exchange process of the plant.

The Facility owner will also evaluate and consider making a donation to an urban canopy renewal program such as the Greening the Gateway Cities Program (GGCP) established by DCR and the Bureau of Forest Fire and Forestry and its supporting organization the MA Urban Canopy Project, or a similar local program like Growing Places. The GGCP was created with a goal of increasing the number of trees planted in urban residential areas and Environmental Justice neighborhoods of the Massachusetts Gateway Cities to improve general air quality and lower energy consumption. Target areas include those that have lower tree canopy, older housing stock, higher wind speeds, and larger renter population. Growing Places is a non-profit in Leominster that focuses on supporting a community-based food program, but also supports the GGCP by providing outreach efforts and educational programming for the program. Providing support to these organizations will enable additional plantings within the Leominster and surrounding urban areas, where it is needed most.

[1] Air Pollution Removal by Urban Tree and Shrubs in the United States; Urban Forestry & Urban Greening 4 (2006) pgs 115-123;
https://www.fs.usda.gov/ne/newtown_square/publications/other_publishers/ne_2006_nowak001p.pdf

6.3 Impacts-Traffic

6.3.1 Overview

The traffic component of the Final Environmental Impact Report (FEIR) provides response to public comment solely, no traffic-related scope was identified in the DEIR Certificate.

A Traffic Impact Study (TIS) was conducted for the proposed project by Bowman Consulting Group, Ltd. (Bowman) dated April 2024 which was included in the ENF. The DEIR included an updated Traffic Impact Study and provided a summary of the additional traffic analysis conducted at nearby intersections along Lancaster Road north of the Project.

6.3.2 Summary of DEIR

The DEIR included an updated Traffic Impact Study (TIS) generally consistent with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines* which analyzed the impacts of the increased traffic generated by the project. The analysis incorporated the following conditions that were not previously analyzed 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 TIS analyzed the transportation impacts of the project at the following intersections (the Study Area) (as shown on Figure 9 in the DEIR):

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

Field-collected data (manual turning movement counts [TMCs]) was used to determine peak traffic hours, existing traffic conditions, and project future build and no-build traffic conditions and impacts. Automatic traffic recorder data collected at the site driveway combined with video data identified peak Facility-specific traffic and the percentage of waste-hauling truck volume on Lancaster Street associated with the Facility.

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6.3 Impacts-Traffic, Continued

6.3.2 Summary of DEIR, Continued

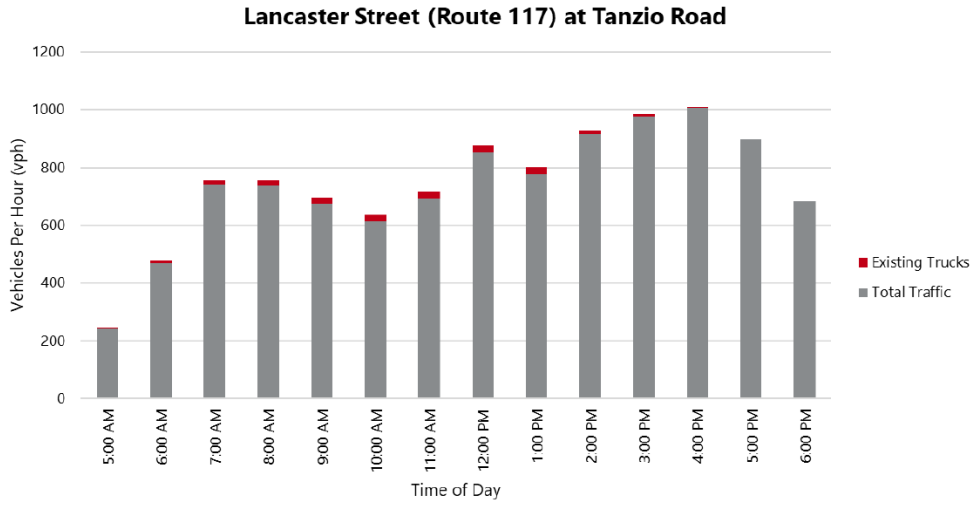
The TIS evaluated traffic impacts in the study-area intersections for a worst-case scenario where all trucks transporting inbound material would depart from the site empty, and all trucks transporting outbound material would arrive at the site empty, with no reduction for the use of backhauls and no rail service. By doing this, it evaluates traffic impacts for more traffic than what is expected (variability in average per truck volumes) and/or if the rail service is impacted and unavailable.

The TIS concluded that the are no significant Level-of-Service impacts associated with maximized facility traffic, therefore if the rail wasn't used, as it is now regularly, it would not significantly increase impacts.

6.3.3 Response to Traffic Comments

As presented in the Traffic section of the DEIR, traffic data collected as part of the updated Traffic Impact Study identified a total of 10,284 vehicles travelling along Lancaster Street at Tanzio Road over the course of 14 hours on March 17, 2025. Of that, 189 were Facility-related vehicles, equivalent to 1.8% of the total traffic. Figure 1 below (which was included in the DEIR as Figure 12) depicts the vehicle counts per hour.

Figure 1- Daily Traffic Counts



Using the automatic traffic data recorder data, it was further determined that of 112 total waste-handling vehicles identified traveling on Lancaster Road at Tanzio Road, 20 were not associated with this Facility.

Continued on next page

6.3 Impacts-Traffic, Continued

6.3.3 Response to Traffic Comments, Continued

The immediate area surrounding the intersection of Tazio Road and Lancaster Street is zoned Industrial on the west side of Lancaster Street and Residential on the east side. In this Industrial zoned area, commercial and/or industrial businesses operate along Tanzio Road and Lancaster Street and have truck traffic associated with it. As evidenced in photos provided by a public commenter, truck traffic associated with businesses at 651, 651R, 645, and 637 Lancaster Street need to maneuver on Lancaster Road in order to reverse into the business' to make deliveries which slows down/stops traffic momentarily on Lancaster Street (just north of Tanzio Road). Additionally, due to the configuration of these properties and street-front parking, it appears general traffic will use this area to pull off the road and stop. Based upon the public comments, these photographed maneuvers by non-Facility trucks occur early morning before the weekday morning peak hour of 7:45 am to 8:45 am and Facility peak hour of 8:00 am to 9:00 am, as reported in the TIS included in the DEIR.

Through the ENF and DEIR process, the Facility has monitored this area and identified vehicles using this area as a temporary stop or staging area as part of their route to/from the Facility. The vehicle(s) identified were issued warnings and instructed to cease stopping there and to instead use the local truck stop. The warning included notice of future penalties and restrictions if the actions continued. The Facility is committed to continuing this practice of enforcement and has an established enforcement procedure for vehicles accessing the Facility that do not follow any established rule or condition of Facility use.

The Facility does not have any control over the delivery schedules to the businesses on Lancaster Street or any other non-Facility related traffic that may park at these businesses. It is understood that these practices may be disruptive to the residents living across the street along Lancaster Road. The Facility commits to continuing compliance and enforcement with vehicles associated with their Facility operations.

6.3.4 Traffic Study by City

The City hired a third-party consultant to perform a limited traffic assessment for the proposed Project in preparation of the upcoming Site Assignment modification process. The traffic assessment included collecting new traffic volume data at the Facility entrance and field-assessment of existing roadway and travel network conditions, and then calculating projected future traffic impacts (Level of Service), in consideration of the Project and other planned projects in the area. The TIS concluded that there were negligible impacts to traffic, which are consistent with the findings presented in the ENF and DEIR. Further review, comparison, and discussion of results from both studies will occur during the site assignment process.

6.4 Impacts-Air Quality

6.4.1 Overview

The Air Quality component of the Final Environmental Impact Report (FEIR) provides supplemental information as requested by MEPA in the DEIR Certificate regarding clarification of modeling inputs and analysis considerations related to emissions and trucks.

An Air Quality Study was conducted for the proposed project by Tech Environmental, Inc. (Tech) dated July 10, 2024 which was included in the ENF. The DEIR included an updated Air Quality Analysis (Greenhouse Gas and Environmental Justice Air Quality Analysis, dated August 2025) in response to MEPA comments in the ENF Certificate.

Air quality analyses focused on Greenhouse Gases and emissions from the Project which is located within an Environmental Justice area. Other screening and evaluations identified:

- The Facility does not use stationary fuel-burning equipment that would be regulated under the Federal Clean Air Act and as such does not require an Air Permit.
- On-site Facility equipment is EPA Tier III or IV rated, reducing on-site emissions.
- Air particulate emission estimations in the ENF indicated potential quantities well below National Ambient Air Quality Standards (NAAQS) as adopted by Massachusetts.

Mitigation measures include environmental controls at the Facility related to air quality and emissions reductions, and general operations of consolidating waste to gain transportation efficiencies, thus reducing total vehicle miles and vehicle related emissions associated with the Project.

6.4.2 Summary of DEIR

The DEIR included a mesoscale emission analysis in accordance with MassDEP Guidelines that assessed NOx, PM_{10}, $PM_{2.5}$, Diesel Particulate Matter (DPM), and VOCs within the seven roadway segments in the Traffic Study Area and EJ community. The analysis was conducted for three cases: Existing, No-build, and Build. This analysis also included an assessment on the environmental burdens and pediatric asthma prevalence for school grades K-8; and qualitative air quality microscale analysis for traffic intersections included in the Traffic Study Area, as well as qualitative and quantitative assessments.

Continued on next page

6.4 Impacts-Air Quality, Continued

6.4.2 Summary of DEIR, Continued

Stationary GHG emissions analysis was performed using the Emissions Footprint Estimation Tool. The analysis is based on the 2010 MEPA Greenhouse Gas Emissions Policy and Protocol (the "2010 GHG Policy"). This analysis confirmed that the Project does not expect to generate 2,000 or more tons per year (tpy) of CO_2 emissions. According to the policy, the analysis should provide energy efficiency modeling to support GHG estimates for the Base Case and Design Case. To the extent a project is already required to conduct a GHG analysis under the 2010 GHG Policy, that analysis satisfies the requirements of Part IV.B. [2]

Transportation GHG analysis was performed using the EPA MOVES4 model for CO_2 emissions. The analysis was conducted for three traffic scenarios: Existing, No-build, and Build along the seven roadway segments in the Traffic Study Area and EJ community. On site idling emissions were also calculated and included in the analysis.

6.4.3 Scope for FEIR

The DEIR Certificate identified the following scope for inclusion in the FEIR related to Air Quality:

1. The FEIR should confirm that the emission estimates for the 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.
2. 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.
3. The FEIR should specify the conversion rates used (VMT to TPY of emissions) to estimate the No Build and Build emissions and confirm that they are applicable to transport.
4. The FEIR should discuss the feasibility of implementing charging infrastructure for trucks, in anticipation of future clean truck mandates.

Continued on next page

[2] MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations Effective Date: January 1, 2022.

6.4 Impacts-Air Quality, Continued

6.4.4 Emissions Estimates

The Greenhouse Gas Emissions Analysis included analysis of stationary and mobile sources. Mobile source analysis scenarios included the three traffic study scenarios where average daily traffic was available for use: 2025 Existing, 2032 No-Build, and 2032 Build. The emission estimates in these scenarios are for Facility-related truck traffic only and do not include other vehicles in the transportation study area.

The improvements in background condition as modelled under future Build Conditions is noted to be attributed to improvements in engine technology per federal clean truck mandates. The mesoscale emissions analysis used the U.S. Environmental Protection Agency (EPA) approved Motor Vehicle Emission Simulator (MOVES) version 4 (MOVES4). Although these mandates may be delayed due to the current federal administration, as documented by EPA, MOVES4 incorporates the emissions impacts of the Heavy-Duty (HD) 2027 rule and the Light-Duty (LD) Greenhouse Gas (GHG) 2023 rule[3].

Heavy duty trucks are considered to be a vehicle with a Gross Vehicle Weight Rating (GWVR) of 26,001 pounds or more, typically including Class 7 and 8 vehicles designed for heavy towing, hauling such as tractor trailers and large sanitation trucks. Therefore the emissions analysis is applicable to the engine technologies used for Facility-related operations.

Average daily diesel truck traffic volumes and county-specific inputs obtained from MassDEP are used to develop the MOVES4 model input files. MOVES4 is applied to generate pollutant-specific emission factors in units of grams per vehicle-mile traveled. These emission factors are multiplied by daily vehicle miles traveled (VMT) to estimate total daily emissions in grams per day, which are then converted to kilograms per day, which can be further projected to an equivalent tons per year quantity (1 kg = 0.00110231 ton). This methodology is applied uniformly to all solid waste truck engine technologies included in the emissions analysis and is consistent with EPA-approved mobile source emissions modeling practices.

Continued on next page

[3] https://www.epa.gov/system/files/documents/2023-08/420f23019.pdf

6.4 Impacts-Air Quality, Continued

6.4.4 Emissions Estimates, Continued

The Project includes two types of vehicle traffic: Diesel truck traffic and employee vehicles. The diesel truck traffic comprises 90% of the overall Facility-related traffic and employee trips are approximately 10% of the overall Facility-related traffic. The Facility is currently not equipped with EV charging stations but would consider adding them if it was requested by employees and/or clients utilizing the Facility that owned heavy duty electric vehicles, and/or if the Facility added any electric vehicles to their fleet that would normally be parked on-site.

6.5 Impacts- Odor

6.5.1 Overview

The odor component of the FEIR provides supplemental information as requested by MEPA in the DEIR Certificate regarding clarification of modeling assumptions and inputs, and assessment of conclusions.

An Odor Study was conducted for the proposed project by Tech Environmental, Inc. (Tech) dated July 10, 2024 which was included in the ENF. The DEIR included an updated Odor Analysis to address comments in ENF Certificate.

6.5.2 DEIR Summary

The DEIR included an updated odor study to supplement the initial study included with ENF. The updates included the evaluation of odor loading from rail cars, as well as response to comments, review of historical odor complaints, and evaluation of overnight storage in regards to odor.

The DEIR concluded that with adherence to BMPs, particularly following first-in, first-out policies; waste covering; limited indoor storage (limited to <600 tons overnight per the permit without additional controls); and timely railcar rotation; odors from the overall Facility remain insignificant and not cause a nuisance condition. Responses to MassDEP comments on the DEIR pertaining to odor and material storage are provided in report section 8.5.

6.5.3 FEIR Scope

The DEIR Certificate identified the following scope for inclusion in the FEIR related to Odors:

1. The FEIR should provide additional details about the supplemental odor analysis provided in the DEIR, including the modeling assumptions used, if the model assumed the waste was covered, and how the results were assessed to reach the conclusions presented in the DEIR.

Continued on next page

6.5 Impacts- Odor, Continued

6.5.4 Modeling Assumptions

The updated odor modeling analysis presented in the DEIR, accounted for both empty and full rail cars. The revised model included a total of 27 rail cars, consisting of 19 empty rail cars and 8 full rail cars. Each rail car was modeled as an individual volume source using representative rail car dimensions.

Odor emission rates were based on dilution-to-threshold (D/T) values of 22.4 D/T for empty uncovered rail cars and 4.5 D/T for full rail cars covered with a Posi-Shell spray-on material prior to being moved outdoors for temporary storage and pickup These values reflect conservative assumptions regarding potential odor generation based on odor measurements collected from rail cars by Tech Environmental at a MSW composting station in Halifax, Nova Scotia.

The odor modelling was conducted using EPA's recommended AERMOD dispersion model (40 CFR 51 Appendix W), version 23132, which is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. The graphical user interface, BEEST, created by Beeline Software, was used to facilitate model setup and post-processing. AERMOD was used in "refined" mode, with full receptor grids and five years of meteorological data from nearby Worcester, MA airport.

The default AERMOD model input units are grams/sec and the default output concentration units predicted by the AERMOD model are ug/m^3. Input source units of (D/T) (m^3/sec) were modeled, and a conversion factor was included with the AERMOD model to convert the output concentration units to odor units (D/T). Separate AERMOD modeling runs were set up to model 15-minute averaging periods. The model predicted maximum 15-minute odor concentrations (D/T values) by setting the model to predict one-hour concentrations and scaling these concentrations within the model by a factor of 1.32 per the one-fifth power law.

The conclusions of potential odor impact were assessed by identifying if the model projected potential sustained odor concentrations greater than 5 D/T at nearby receptors.

Continued on next page

6.5 Impacts- Odor, Continued

6.5.5 Odor Study by City

The City hired a third-party consultant to perform air emission modeling for the proposed Project in preparation of the upcoming Site Assignment modification process. Inputs into the model were generally the same as those prepared for and presented in the ENF and DEIR, however there were some identified differences in the inputs that resulted in different calculated odor concentrations and frequency. These include but are not limited to: accounting for existing odor control technology used at the Facility and application of conversion factors. Further review, comparison, and discussion of results from both studies will occur during the site assignment process.

7.Mitigation and Draft Section 61 Findings

7.1 Introduction

UMML has prepared these Section 61 Findings to comply with the requirements of the Secretary's DEIR Certificate (the Certificate) issued on November 7, 2025 for EEA #16878, the requirements of Massachusetts General Laws, Chapter 30, Section 61, and the Massachusetts Environmental Policy Act (MEPA) regulations at 310 CMR 11.07(6)(k).

As required in the Certificate, "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 form, 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."

7.2 Regulatory Overview

In accordance with M.G.L. c. 30, section 61, any Agency, that takes Agency Action on a Project for which the Secretary required an EIR, shall determine whether the Project is likely to, directly or indirectly, cause any Damage to the Environment and make a finding describing the Damage to the Environment and confirming that all feasible measures have been taken to avoid and minimize the Damage to the Environment.

Contents of Section 61 Findings

In all cases, the Agency shall base its Section 61 Findings on the EIR and shall specify in detail: all feasible measures to be taken by the Proponent, or any other Agency or Person, 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. The Final EIR (FEIR) is required as part of the Certificate of the Secretary of Energy and Environmental Affairs to include a separate chapter on mitigation measures associated with FEIR and that this chapter also includes Draft Section 61 Findings for all state agency actions.

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.2 Regulatory Overview, Continued

The Draft Section 61 Findings shall contain a clear commitment to implement mitigation, an estimate of the individual costs of the proposed mitigation, identification of the parties responsible for implementing the mitigation, and a schedule for the implementation of mitigation. In accordance with M.G.L. c. 30, section 61, the reasonably foreseeable climate change impacts of a project, including its additional GHG emissions, and effects, such as predicted sea level rise shall be taken into consideration.

Section 61 Findings and Agency Action

Provided that mitigation measures are specified as conditions to or restrictions on the Agency Action, the Agency shall:

1. Make its Section 61 Findings part of the Permit, contract or other document allowing or approving the Agency Action, which may include additional conditions to or restrictions on the Project in accordance with other applicable statutes and regulations; or

2. Refer in its Section 61 Findings to applicable sections of the relevant Permit, contract or other document approving or allowing the Agency Action.

Subject Matter Jurisdiction Limitations on Section 61 Findings

In the case of a Project undertaken by a Person that requires one or more Permits or a Land Transfer but does not involve Financial Assistance, any Participating Agency shall limit its Section 61 Findings, or any mitigation measures specified as conditions to or restrictions on the Agency Action, to those aspects of the Project that are within the subject matter of any required Permit or within the area subject to a Land Transfer.

Proposed Section 61 Findings

Proposed Section 61 Findings prepared by a Proponent in accordance with 301 CMR 11.07(6)(k) are intended to assist a Participating Agency in fulfilling its obligations in accordance with M.G.L. c. 30, section 61. The Proponent's preparation of Proposed Section 61 Findings shall not mean that a Participating Agency has made its own Section 61 Findings. Except in accordance with 301 CMR 11.06(4) and 11.08(7), the Proponent's Proposed Section 61 Findings shall not limit an Agency's discretion in making its own Section 61 Findings.

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7.Mitigation and Draft Section 61 Findings, Continued

7.2 Regulatory Overview, Continued

Filing and Distribution of Section 61 Findings

The Proponent and a Participating Agency shall each file a copy of the Section 61 Findings with the Secretary, who shall publish notice of the availability of the Section 61 Findings in the next Environmental Monitor in accordance with 301 CMR 11.15(2), and shall each circulate copies of the Section 61 Findings to any Agency or Person upon request.

7.3 State Agency Actions

The following table identifies the required State Agency Actions for the Project:

Table 1- Required State Agency Actions

State Agency	Action
Executive Office of Energy and Environmental Affairs	MEPA review and Secretary's Certificate (ENF, DEIR, FEIR)
Department of Environmental Protection (MassDEP)	Modification to Large Handling Facility Operating Permit (BWP SW 07)

7.4 Mitigation Summary

The following has been identified as Project Impacts: Traffic, Noise, Odor, and Air Quality/GHG. As requested, the below Table 2 presents a summary of Project mitigation commitments to address potential impacts, organized by type of Impact, as listed above. The table also has two additional sections to address Other Nuisance Conditions and Environmental Justice. As noted previously in the DEIR, no construction is proposed as part of the Project, therefore no construction-related mitigation measures are identified. Implementing this Project at an existing facility that does not need physical expansion can be considered a reduction in overall impacts, as there are no construction-related impacts.

Traffic

As identified in the updated Traffic Impact Study presented in the DEIR, intersection and roadway operations will not be impacted by the Project, and do not require any mitigation measures. Mitigation measures proposed by the Project as summarized in Table 2 are intended to minimize potential overall impacts to local roadways and traffic within Environmental Justice areas.

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.4 Mitigation Summary, Continued

Noise

As identified in the Sound Studies provided in the ENF and DEIR, the Project will comply with the MassDEP Noise Policy and the Leominster Noise Ordinance, and will not cause a condition of noise pollution or nuisance sound. Acoustic modeling of the Facility operations at maximum loading was performed to analyze sound levels at 22 residential receptors using sound levels data collected at the Facility. The study assumed that one of the overhead tipping doors would be closed during end-of-day conditions (between 5pm and 7 pm), therefore the mitigation proposed for noise is that one of the overhead tipping doors will be closed after 4pm to ensure compliance with the study assumptions. No other mitigation was determined necessary.

Noise from truck traffic along Lancaster Road (within a designated EJ area) was assessed as part of the DEIR and determined to be negligible as the overall Project traffic (considering worst case with no use of rail) would only equate to a 3.7% increase in overall roadway traffic. This small increase in vehicle volume would generate a negligible increase in traffic noise.

The Project will mitigate potential noise impacts from the Facility to the immediate surrounding receptors using multiple operational strategies, as identified in Table 2.

Odor

As identified in the Odor Studies provided in the ENF and DEIR, the Project will not cause an adverse impact to health, safety, or the environment with respect to odors at nearby receptors. Odor dispersion modeling was conducted to determine potential odor impacts from the Facility. The modeling indicated that the overall frequency and volume of MSW storage in the building overnight will determine if further mitigation measures may become necessary in expanded operations. As the tonnage increase does not necessarily equate to more MSW as the Facility also receives C&D, the Project does not automatically require additional mitigation measures for odors.

The Project will mitigate potential odor impacts from the Facility using multiple operational strategies, as identified in Table 2. In response to public comments, recent modifications to the atomized misting system were completed which included the replacement of the dosimeter to improve counteractant dosing control and misting nozzles to improve atomization and coverage. Monitoring of waste storage volumes in future operations will determine if additional strategies will be needed to control nuisance odors at the Facility.

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.4 Mitigation Summary, Continued

Air Quality

As identified in the Air Quality and the Greenhouse Gas, Environmental Justice Air Quality Studies, the Project will not generate emissions that would represent an unfair or inequitable environmental burden or related public health consequence. The studies included: a quantitative analysis of GHG emissions at the Facility including stationary and mobile) which demonstrated that emissions are negligible and do not require further assessment; mesoscale air quality analysis of mobile sources; determination that a microscale analysis was not required; assessment of pediatric asthma prevalence for K-8 schools; and public health assessment in consideration of existing environmental burdens and Vulnerable Heath Criteria. No other mitigation was determined necessary.

Air Quality will not be significantly impacted by the Project and mitigation measures proposed by the Project as summarized in Table 2 below are intended to minimize potential impacts to air quality within Environmental Justice areas.

Other

Additional mitigation measures were included to address other potential impacts and nuisance conditions from operations. These included operational and good housekeeping measures to control and mitigate dust, reduce loading to the stormwater collection and treatment system, and measures implemented in response to public comments. These additional measures are also included in Table 2.

Environmental Justice

As summarized within this Mitigation Summary section and identified in the Greenhouse Gas, Environmental Justice Air Quality Study included in the DEIR, the Project will not create impacts that would represent an unfair or inequitable environmental burden or related public health consequence within the Environmental Justice Areas in proximity to the Facility. Many of the mitigation measures presented apply to both the subject matter and Environmental Justice.

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.4 Mitigation Summary, continued

Table 2 – Mitigation Commitment Summary

Impact Category	Mitigation Measure	Schedule/Cost	Responsibility
Traffic	Maximize rail transport	Ongoing/ NA	UMML
	Install sign on Malburn Street indicated no truck thru traffic	Following Site Assignment modification/TBD	UMML to coordinate with City for approval
	Maintain truck route for outbound materials	Ongoing/NA	UMML
	Provide regular communications with haulers/clients regarding truck routes, ours of operation, etc.	Ongoing/$500 annually	UMML
	Direct deposit offered to employees	Ongoing / NA	UMML
Noise	Conduct all waste handling activities within the confines of the building	Ongoing/ NA	UMML
	Maintain tipping door locations on north side of handling building, away from the easterly and southern residential areas to maintain visual aesthetic from Tanzio Road and minimize potential noise nuisance conditions	Ongoing/ NA	UMML
	Close at least one of the three of the overhead doors after 4pm to reduce noise during end-of-day conditions	Ongoing/NA	UMML
	Limiting the outside rail car mover activity to within permitted operational hours and not before 6am	Ongoing/ NA	UMML
	Require trucks with tailgates 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	Ongoing/ NA	UMML

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.4 Mitigation Summary, continued

Table 2 – Mitigation Commitment Summary, continued

Impact Category	Mitigation Measure	Schedule/Cost	Responsibility
Noise	Limiting equipment operation outside the building prior to 6 AM (weekdays) and 7 AM (Sat); and after 7 PM (weekdays) and 3 PM (Sat)	Ongoing/ NA	UMML
	Assess if modifications to the interior ventilation system could reduce noise	Assessment completed. Estimated @25k-$40k for upgrades	UMML
	Provide regular communications with haulers/clients regarding truck routes, ours of operation, etc.	Ongoing/$500 annually	UMML
	Investigate reports of trucks parking on nearby streets prior to facility opening and issue warning to company(ies) that if activity continues, they will not be allowed to use the facility	Completed and to continue as ongoing measure/ NA	UMML
Odor	Conduct all waste handling activities within the confines of the building	Ongoing/ NA	UMML
	Maintain overhead door locations on north side of handling building, away from the easterly and southern residential areas to maintain visual aesthetic from Tanzio Road and minimize potential odor migration	Ongoing/ NA	UMML
	Maintain overhead doors as currently constructed on one side to reduce wind tunnel effect	Ongoing/ NA	UMML
	Assess if replacement of door motors could speed operation	Assessment completed. Not recommended by door manufacturer.	UMML
	Limit MSW tonnage to 600 tons on the floor overnight	Ongoing/ NA	UMML

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.4 Mitigation Summary, continued

Table 2 – Mitigation Commitment Summary, continued

Impact Category	Mitigation Measure	Schedule/Cost	Responsibility
Odor	Maintain atomized misting system within the handling building to control dust and odors	Ongoing/ $40,000 annually	UMML
	Modify components (dosimeter and nozzles) of the misting system to increase coverage and dosing level capabilities	Completed summer 2025/$20,000	UMML
Air Quality/ GHG	Maximize rail transport	Ongoing/ NA	UMML
	Utilize existing electrically-powered processing line with no planned replacement/conversion of components to fuel-powered equipment	Ongoing/ NA	UMML
	Adhere to and enforce anti-idling requirements of vehicles on site	Ongoing/ NA	UMML
	Plant additional trees on site, as space allows	Following ATO modification / ~$6,000	UMML
	Evaluate and consider making a donation to an urban canopy renewal program.	Following ATO Modification / $TBD	UMML
Other/ Nuisance Conditions	Maintain impervious pavement on all surfaces that are associated with facility operations to control dust and reduce loading to stormwater treatment system	Ongoing / unquantified	UMML
	Continue regular sweeping of outdoor paved surfaces to control dust and minimize potential sediment migration during storm events	Ongoing / unquantified	UMML
	Modify street sweeper to include magnets at the front and back to pick up nails/screws along Tanzio Road	Completed Winter 2024-25 / $NA	UMML

Continued on next page

7.Mitigation and Draft Section 61 Findings, Continued

7.4 Mitigation Summary, continued

Table 2 – Mitigation Commitment Summary, continued

Impact Category	Mitigation Measure	Schedule/Cost	Responsibility
Other	Maintain stormwater controls and BMPs throughout ongoing operations	Ongoing/ $10,000 annually	UMML
	Maintain compliance with on-going operations & maintenance (O&M) and inspection procedures	Ongoing/ unquantified	UMML
	Maintain complaint log to record instances of complaints and follow-up measures	Ongoing/NA	UMML
	Utilize existing infrastructure to handle the proposed increase in tonnage, eliminating construction-related impacts	NA/$0	UMML
EJ	Maximize rail transport	Ongoing/ NA	UMML
	Utilize existing electrically-powered processing line with no planned replacement/conversion of components to fuel-powered equipment	Ongoing/ NA	UMML
	Adhere to and enforce anti-idling requirements of vehicles on site	Ongoing/ NA	UMML
	Plant additional trees on site, as space allows	Following ATO modification / ~$6,000	UMML
	Maintain truck route for outbound materials	Ongoing/NA	UMML
	Provide regular communications with haulers/clients regarding truck routes, ours of operation, etc.	Ongoing/ NA	UMML
	Direct deposit offered to employees	Ongoing / NA	UMML
	Evaluate and consider making a donation to an urban canopy renewal program.	Following ATO Modification / $TBD	UMML

Notes:
Mitigation costs provided are those which have already been completed, or as approximated (~). Costs that are indicated as unquantified indicates there are variables that make assigning a value difficult. NA: Not Applicable or Available.

8.Response to Comments

8.1 Overview

This section provides responses to comment letters submitted during the comment period for the DEIR. Comment letters from individuals and regulatory agencies were attached to the Secretaries Certificate.

The FEIR is divided into sections as defined in 301 CMR 10.07 (6) and as amended by the Scope section of the Secretaries Certificate. Each section of the FEIR addresses the issues detailed in the Secretaries Certificate. A cross-reference and response to each topic/comment in the Secretaries Certificate is included as Table 4 presented within Attachment 4.

This section includes a brief synopsis of the public comment(s), followed by a response and identification of the location within the FEIR that the comment is addressed. Comments that are addressed are identified by a letter/number designation in the margin of the comment letter or document. The comment letters included with the Secretaries Certificate with the comment identification in the margin is included in Attachment 5.

The following is a list of the agencies, organizations, and individuals that submitted comments on the DEIR. The letter code used for identification of the commenter is noted in parentheses. The letter code is followed by a dash and a number to indicate the number of comments on different topics were made by the commenter.

- Haily Brady (HB) – 3
- Steven Allain (SA) – 2
- Massachusetts Department of Transportation (MassDOT) - 1
- Massachusetts Department of Environmental Protection, Central Regional Solid Waste Office (MassDEP) -3

Continued on next page

8.Response to Comments, Continued

8.1 Overview, continued

The following table summarizes the main topic of concern raised in the comment letters received as part of the DEIR process.

Table 3: Summary Table of DEIR Public Comment Topics

Commenter		Comment Topics [1]						
		Traffic	Noise	Odor	Against	Vectors	Other	Support
1	HB	x					x	
2	SA	x						
3	MassDEP						x	
4	MassDOT	x					x	

1. The Comment Topics listed above were those previously listed in the DEIR from the ENF process and does not reflect the scope of comments received on the DEIR.

After reviewing the comments submitted as part of the DEIR and as tabulated above, it was determined that the public comments addressed the same issue of traffic, and the two Departmental comment letters focused on that Department's jurisdiction. As such, a general response to the traffic comments, and a response to each Department letter comments has been prepared in the following sections. Note that the MassDOT letter did not include any additional comments to be addressed. MassDOT indicated that "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 upon transportation issues." No further response to MassDOT's comment letter is required.

In the following sections a summary of each of the topics noted in comment letters is provided. A response to the comments follows the summary of each topic. The right margin indicates where the response to a specific comment is addressed. The comment numbers in the index use the numbering system defined above.

Continued on next page

8.Response to Comments, Continued

8.2 Traffic Comments

Index
HB-1,2
SA-1,2

Comment Summary

The public comments received cited traffic in the area as a concern. The comments received are summarized below:

- The area cannot handle an increase in traffic. (HB-1)
- The intersections in North Leominster are poorly designed. (HB-2)
- Photos were provided showing trucks parked at 637 Lancaster Street and trucks maneuvering to access businesses near 637, 645, 651, and 651 R Lancaster Street. Commenter stated that adding more trucks to this area is not a good idea. (SA-1)
- Inquiry if repaving the road has been considered. (SA-2)

Response to Comments

Section 6.3.3 of the FEIR addresses public comments on traffic. As previously presented in the Traffic section of the DEIR, traffic data collected as part of the updated Traffic Impact Study identified a total of 10,284 vehicles travelling along Lancaster Street at Tanzio Road of which only 189 were Facility-related vehicles, equivalent to 1.8% of the total traffic. This study also concluded that the addition of more vehicles from this Project (which were over estimated to account for worst-case scenario of no rail, and no vanpool) would not impact current normal traffic delays and movements at the study area intersections.

The immediate area surrounding the intersection of Tazio Road and Lancaster Street is zoned Industrial on the west side of Lancaster Street and Residential on the east side. In this Industrial zoned area, commercial and/or industrial businesses operate along Tanzio Road and Lancaster Street and have truck traffic associated with it. As evidenced in photos provided by a public commenter, truck traffic associated with businesses at 651, 651R, 645, and 637 Lancaster Street need to maneuver on Lancaster Road in order to reverse into the business' to make deliveries which can ultimately slow down/stop traffic momentarily on Lancaster Street (just north of Tanzio Road). Additionally, due to the configuration of these properties and street-front parking, it appears general traffic will use this area to pull off the road and stop. Based upon the public comments, these photographed maneuvers by non-Facility trucks occur early morning before the weekday morning peak hour of 7:45 am to 8:45 am and Facility peak hour of 8:00 am to 9:00 am, as reported in the TIS included in the DEIR.

Continued on next page

8.Response to Comments, Continued

8.2 Traffic Comments, Continued

Through the ENF and DEIR process, the Facility has monitored this area and identified facility-related vehicles using this area as a temporary stop or staging area as part of their route to/from the Facility. The vehicle(s) identified were issued warnings and instructed to cease stopping there and to instead use the local truck stop. The warning included notice of future penalties and restrictions if the actions continued. The Facility is committed to continuing this practice of enforcement and has an established enforcement procedure for vehicles accessing the Facility that do not follow any established rule or condition of Facility use.

Index HB-1,2 SA-1,2

The Facility does not have any control over the delivery schedules to unaffiliated businesses along Lancaster Street or any other non-Facility related traffic that may park at these businesses. It is understood that these practices may be disruptive to the residents living across the street along Lancaster Road, and the Facility commits to continuing compliance and enforcement of vehicles associated with their Facility operations.

Discussions about the overall condition of Lancaster Street occurred with member(s) of the City Council at the public meeting on June 24, 2025, as noted in Chapter 10 of the DEIR. As the Facility currently contributes only 1.8% of the overall traffic on state route 117, repaving by the Facility is not reasonable.

8.3 Other Public Comments

Comment Summary

- Concerned about impact to Nashua River (HB-3)

Index HB-3

Comment Response

- The Facility is located over 2,700 feet from the Nashua River. The Facility has procedures and controls in place to manage potential releases to the environment including the following:
- Handling all waste inside the building, under cover.
- Trench drains inside the handling building intercept any potential contact water.
- Facility good housekeeping measures required per Facility O&M plan that is part of the Facility's operating permit(s).
- Stormwater management system designed to remove 89% of total suspended solids, and is equipped with oil-water separator and hoods to trap oil.

Continued on next page

8.Response to Comments, Continued

8.3 Other Public Comments, Continued

- O&M on stormwater system maintains system in good operating order so it functions as intended.
- The Facility has a written Spill Prevention, Control, and Countermeasure Plan in place that requires regular inspections, preventative maintenance, training, and response actions to spills or potential spill scenarios.
- Overall Facility design including BMPs and operations is protective of the environment and any on-site spill would unlikely impact the nearby unnamed stream that ultimately connects to the North Nashua River.

Index HB-3

8.4 MassDOT Comments

Comment Summary

- Based on the Project's minimal impact on the state highway system, MassDOT recommends no additional MEPA review be required for the project based upon transportation issues.

Comment Response

- No response required.

Index MassDOT

8.5 MassDEP – Solid Waste Comments

Comment Summary

MassDEP included the following comments:

1. Clarify difference between operating hours and waste acceptance hours
2. Confirm operating efficiency and odor control in regards to overnight MSW storage volumes
3. Confirm feasibility of operating misting system at all times during waste acceptance hours, and identify alternative protocols that would be implemented to control dust and odor in lieu of misting system.

Comment Response

1. Section 6.1.4 clarifies the difference between operating hours and waste acceptance hours. A noise mitigation measure is identified as "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 "permitted waste acceptance hours" in which additional trucks would be accessing and operating at the Facility and generating additional operational noise.

Index MassDEP

Continued on next page

8.Response to Comments, Continued

8.5 MassDEP – Solid Waste Comments, Continued

Outside of these hours, operations would be limited to only Facility vehicles and equipment which would primarily be operated in the building for equipment warm-up, preparation of waste acceptance, loading of rail cars, vehicle maintenance, etc; or if Facility repairs or maintenance needs to occur while the Facility is not in operation due to safety concerns. Typically, Facility employees will arrive at and leave from the site 1-2 hours before and after waste deliveries. This timeframe allows the Facility to prepare for waste deliveries, conduct any required maintenance, load outbound railcars or vehicles, and conduct general beginning and end-of-day housekeeping.

Index MassDEP

It should be noted that the current posted waste delivery hours for inbound vehicles ("gate hours") are further limited within the permitted waste acceptance hours, although noise impact studies are conservative and account for full operations within the permitted waste acceptance hours to assess the current permitted conditions and worst-case scenario.

2. The current overnight storage limit for MSW as imposed in the current ATO is 600 tons. Regardless of how much MSW is tipped in a given day, the overnight storage amount is limited to that amount. In terms of odor control, the 600 tons that is stored overnight, would need to be loaded out following the first-in, first out operational practice to reduce the potential for increased odor.

   Additionally, in assessing the operational floor space to handle an additional 500 tons per day (1,500 tpd total), the handling building 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 tipping and loadout areas. This equates to storage of 2 days of full inbound capacity, at the 1,500 tons per day. If 600 tons of MSW was left on the floor overnight, there is still ample receiving and storage area to accept another 1,500 tons without consideration of any outbound loadout. There is ample floor space to handle the additional tonnage proposed.

Continued on next page

8.Response to Comments, Continued

8.5 MassDEP – Solid Waste Comments, Continued	3. Operating a misting system throughout the winter months is not feasible because the handling building is unheated and the system will freeze and burst. Heat traces are not adequate, as the nozzles will still freeze, and adding anti-freeze to the misting system is not safe for the environment or employees. In terms of odor control, the misting system is less important to control odor in the winter months because the cold winter conditions significantly slows waste degradation and thereby reduce the potential odor generation from the waste mass. When the misting system cannot be operated due to freezing temperatures, the Facility can and will employ the following measures as appropriate, safe, and practicable; in addition to utilizing the air handling system to achieve the same odor and dust control that the misting system provides: • Use handheld hoses for dust suppression on extra dusty loads • Close doors if a load is anticipated to be dusty (C&D primarily) • Tip dusty loads further into the building, away from the doors • Follow first in-first out MSW procedures to reduce MSW storage time.	Index MassDEP

ATTACHMENT 1

MEPA DEIR AND ENF CERTIFICATES

The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900, Boston, MA 02114
www.Mass.gov/EEA | **Tel:** (617) 626-1000 | **Fax:** (617) 626-1081

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

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.

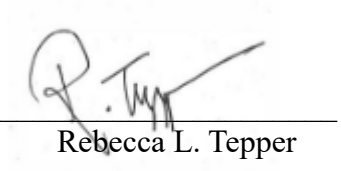
Responses to Comments

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

The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Maura T. Healey
GOVERNOR

Kimberley Driscoll
LIEUTENANT GOVERNOR

Rebecca L. Tepper
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1081
http://www.mass.gov/eea

December 9, 2024

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME	: United Material Management of Leominster
PROJECT MUNICIPALITY	: Leominster
PROJECT WATERSHED	: Nashua River
EEA NUMBER	: 16878
PROJECT PROPONENTS	: United Mineral Management of Leominster, LLC
DATE NOTICED IN MONITOR	: September 25, 2024

Pursuant to the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62L) and Section 11.06 of the MEPA Regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of a mandatory Draft Environmental Impact Report (DEIR).

Project Description

As described in the Environmental Notification Form (ENF), 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. 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.

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. According to the ENF, 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.

Environmental Impacts and Mitigation

Environmental impacts associated with the project include generation of 110 New truck trips per day in addition to the approximately 224 truck trips generated by operation of the existing facility (334 total truck trips under proposed conditions). The ENF did not identify the number of employee vehicle trips, which was previously estimated to be 42 average daily trips (adt) in the 2018 ENF; the DEIR should confirm the number of non-truck vehicle trips associated with the site under existing and proposed conditions. 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. Additional measures should be identified in the DEIR, 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.

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.

SCOPE

General

The ENF described the project and its impacts largely in a format consistent with the application form for a Site Suitability Modification permit from MassDEP. The DEIR should not be prepared in the permit application format. The DEIR should be prepared in accordance with Section 11.07 of the MEPA regulations for outline and content, and it should provide the information and analyses required in this Scope. 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.

Project Description and Permitting

The ENF included a brief description of existing and proposed conditions, preliminary project plans, an alternatives analysis, and measures to avoid, minimize and mitigate environmental impacts. During the review period, the Proponent distributed a copy of an analysis of the project's transportation impacts. Consistent with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, the ENF contained an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"),[1] together with information on climate resilience strategies to be undertaken. The DEIR should provide a more detailed description of the impacts and mitigation measures, as set forth in this Scope.

The DEIR should provide detailed plans, sections, and elevations to accurately depict existing and proposed conditions, including proposed above- and below-ground structures, resiliency and other mitigation measures. The DEIR should identify, describe, and assess the environmental impacts of any

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

changes in the project that have occurred between the preparation of the ENF and DEIR. It should provide updated calculations of impacts in a tabular format. The DEIR should identify and describe state, federal and local permitting and review requirements associated with the project, provide an update on the status of each of these pending actions, analyze applicable statutory and regulatory standards and requirements, and provide a discussion of the project's consistency with those standards.

The information and analyses identified in this Scope should be addressed within the main body of the DEIR and not in appendices. In general, appendices should be used only to provide raw data, such as drainage calculations, traffic counts, capacity analyses and energy modelling, and such data and analyses should be summarized with text, tables and figures within the main body of the DEIR. Information provided in appendices should be indexed with page numbers and separated by tabs, or, if provided in electronic format, include links to individual sections. Any references in the DEIR to materials provided in an appendix should include specific page numbers to facilitate review.

Alternatives Analysis

The project is proposed to meet increasing demand for MSW and C&D waste disposal in Massachusetts. According to MassDEP, solid waste transfer facilities are necessary to divert and dispose of waste to conserve the state's declining landfill capacity. The ENF included an alternatives analysis that evaluated No Build and Millbury Facility Expansion Alternatives. The No Build Alternative would maintain the facility's existing capacity of 1,000 tpd. According to the ENF, 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. Waste material that would be transported to the proposed facility would have to be transported elsewhere at potentially greater distances with greater air emissions, particularly if rail were not available for transportation of waste.

The Millbury Facility Expansion Alternative would involve expansion of the capacity of the Proponent's existing facility in Millbury by 500 tpd, from 1,000 tpd to 1,500 tpd. The Millbury facility is the transfer facility owned by the Proponent that is closest to the Leominster facility. According to the ENF, the Millbury facility is not served by rail, and therefore all material would be transported to and from the site by trucks, which is four times less efficient in terms of fuel use and emissions 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. According to the ENF, the Milbury Facility Expansion Alternative was not pursued because of the greater distances that trucks would need to travel and the lack of rail service.

According to the ENF, the Preferred Alternative will minimize environmental impacts by using an existing facility that was originally designed and constructed with the capacity to accommodate additional waste. The facility transports all waste from the site using rail cars rather than trucks, which minimizes traffic and air quality impacts. According to the ENF, transporting waste by rail is four times more fuel efficient than transporting waste by trucks; trains can move a ton of freight over 470 miles on a single gallon of fuel whereas a truck can move a ton of freight only approximately 134 miles per gallon of fuel.

The DEIR should review additional alternative sites for a new or expanded transfer facility, including the locations previously reviewed in the 2018 ENF. To the extent specific sites were considered for either expansion or construction of a new facility, the DEIR should present a full comparison of environmental impacts, including impacts to nearby EJ populations, as between those locations and the currently proposed site. The DEIR should also discuss whether operations at the current location could be modified to further minimize traffic, odor and noise impacts as compared to the Preferred Alternative.

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 in Leominster, 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.

Effective January 1, 2022, all new projects in DGAs as defined in 301 CMR 11.02, as amended around EJ populations are subject to new requirements imposed by Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* ("Climate Roadmap Act") and amended MEPA regulations at 301 CMR 11.00. Two related MEPA protocols – the MEPA Public Involvement Protocol for Environmental Justice Populations ("MEPA EJ Public Involvement Protocol") and MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations ("MEPA Interim Protocol for Analysis of EJ Impacts") – are also in effect for new projects filed on or after January 1, 2022. Under the new regulations and protocols, all projects located in a DGA around one or more EJ populations must take steps to enhance public involvement opportunities for EJ populations, and must submit analysis of impacts to such EJ populations in the form of an EIR. The ENF identified the DGA as one mile.

Community Engagement

The Proponent prepared an EJ Screening Form which was distributed to a list of community-based organizations (CBOs) and tribes/indigenous organizations (the "EJ Reference List") provided by the MEPA Office and to the Leominster Spanish American Center, local elected officials and City agencies. Upon filing the ENF, the Proponent visited nearby homes to alert local residents of the filing and provide project information. The project distribution list was expanded after the public informational meeting noted below to include attendees of the meeting, and will be further expanded to include anyone expressing an interest in the project. After providing advance notice of the filing of the ENF and prior to its filing, the Proponent held a public informational meeting at the Leominster Public Library on July 22, 224. The meeting was publicized through advertisements in local English and Spanish-language newspapers, by providing notice in English and Spanish to the City and to the Leominster Spanish American Center, and by posting notice of the meeting and other project-related materials in English and Spanish on the project website (www.ummleominster.com). A Spanish-language interpreter was available for the meeting, but translation services were not requested. In addition to the Proponent, the meeting was attended by two people, including the state representative for the district and a representative of the City's Board of Health. Meeting attendees inquired about new

jobs that may be created by the project; according to the Proponent, up to 18 positions may be created in connection with adding a second shift for C&D processing.

A MEPA site visit and hybrid consultation session were held on Wednesday November 13, 2024. The site visit, which included a tour of the facility and explanation of facility operations under existing and proposed conditions, was held at the project site at 4:00 PM and was attended by MEPA staff, the Proponent's representatives, and four members of the Leominster City Council. The consultation session was held at 6:00 PM at the Franco American War Veterans Function Hall in Leominster. A Spanish interpreter was available at the consultation session, but his services were not requested. The Proponent's presentation and a recording of the meeting are posted on the project website. In addition to MEPA staff and the Proponent's representatives, the consultation session was attended in person by a member of the Leominster City Council, two City of Leominster staff members, and four residents; two additional residents participated remotely. Issued raised by residents included truck traffic, including associated noise, through residential areas; train safety at road crossings; noise from trains late at night; and trash, including construction debris such as nails, from trucks delivering waste to the site littering area streets and wetlands. Residents recommended that the Proponent conduct more frequent sweeps along truck routes to pick up trash, work with the City and railroad operator to provide motorists with notice when roads will be closed due to train crossings, and revise the traffic study to include container trucks passing through residential areas to access the site after collection curbside trash in Leominster. As detailed below, the Proponent should address these issues in the DEIR.

The ENF included a Public Involvement Plan (PIP) which describes ongoing public engagement efforts to be implemented by the Proponent, including additional public informational meetings if requested by the public, distribution of notices of future public hearings to the project distribution list, maintaining updated project information on the project website, and continuing communication with elected representatives, City officials, and the Spanish American Center.

The DEIR should include an updated PIP that contains a full description of 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. The DEIR, or a summary thereof, should be distributed to the EJ Reference List that was used to provide notice of the ENF. The Proponent should obtain a revised EJ Reference List from the MEPA Office to ensure that contact information is updated. I note that the purpose of the MEPA Public Involvement Protocol is to require direct and meaningful engagement with EJ populations, including low-income and minority residents as well as those who lack resources to fully participate in public processes. The Proponent is strongly encouraged to develop public involvement strategies that seek meaningful input from EJ populations that may be affected by the project by engaging directly with residents and community organizations. In addition, the Proponent should hold at least one public meeting prior to filing the DEIR. The Proponent is encouraged to seek input from the MEPA and EEA EJ Offices in planning this meeting and updating the project PIP.

Baseline Assessment and Project Impacts

The DEIR should include a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations within the

DGA in accordance with 301 CMR 11.07(6)(n)1 and the MEPA Interim Protocol for Analysis of EJ Impacts. Specifically, the DEIR should use the DPH EJ Tool to identify any census tract or municipality in which the EJ populations are located as exhibiting "vulnerable health EJ criteria"; this term is defined in the DPH EJ Tool to include any one of four environmentally related health indicators that are measured to be 110% above statewide rates based on a five-year rolling average. In addition, sources of potential pollution should be identified within the identified EJ populations, based on the mapping layers available in the DPH EJ Tool. The DEIR should also identify any air quality related indicators in EPA's EJ Screen that are elevated at or above the 80th percentile of statewide average and provide these data 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. The DEIR should identify the number and type of facilities within 1 mile that operate under MassDEP air or solid waste permits, and state how this number compares to statewide totals.

According to the ENF, all project-generated trucks will use a truck route that passes entirely through EJ populations located between the site and I-190. The ENF did not identify routes through EJ populations used by trucks that transport waste to the site from other directions, including trucks collecting curbside wase in Leominster; these routes, and the number of project-generated trucks using the routes should be described in the DEIR. The DEIR should provide air quality analysis consistent with the *MassDEP Guidelines for Performing Mesoscale Analysis of Indirect Sources (1991)*, as indicated in the Air Quality Scope below. For the EJ block groups along truck routes, the DEIR should also utilize Massachusetts Department of Environmental Protection (MassDEP) Cumulative Impact Analysis (CIA) methods[2] to analyze asthma prevalence at a finer scale via pediatric asthma prevalence for k-8 schools. The data for pediatric asthma prevalence can be downloaded on the MassDEP CIA website (Indicator Data for Cumulative Impact Analysis) and all pre-kindergarten to twelfth grade (PK-12) public schools can be viewed on the online MassDEP CIA Mapping Tool.[3] These data should be provided for all schools servicing the any EJ neighborhoods along truck routes within the DGA, and the DEIR should report any rates that are above the statewide average. The DEIR should discuss the extent to which Transportation Demand Management (TDM) measures will serve to reduce diesel vehicle traffic, including delivery trucks, associated with project operations. It should also discuss other potential mitigation measures, such as early adoption of federal and state clean truck mandates for any fleet vehicles, installation of EV charging infrastructure onsite for trucks and vehicles, and re-routing of or time limitations on truck routes. If impacts are unavoidable, the DEIR should consider measures to improve air quality in affected EJ neighborhoods, such as tree plantings, air monitoring, indoor air filters, and contributions to local public health services.

Commenters identified a number of impacts along transportation routes used by project-generated trucks and trains, including noise, particularly early in the morning and late at night; queuing of trucks along Lancaster Street and New Lancaster Road; odor and scattering of trash from tucks that are not adequately covered; rodents along the transportation routes; and traffic disruptions associated with the at-grade train crossing on Litchfield Street. According to the ENF, waste transported to and from the site is required to be covered to minimize potential odor and trash deposition. The DEIR should describe measures that will be implemented by the Proponent to further minimize these impacts. It should identify potential sources of noise associated with transport of waste and review alternatives for

[2] 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.
[3] MassDEP CIA Mapping Tool

minimizing impacts, such as management of trucks arriving during early morning hours. The DEIR should include a discussion of proposed mitigation and include such measures in draft Section 61 findings. I note that generalized project benefits should not be analyzed to "net out" project impacts, unless the benefit serves to mitigate the specific impact analyzed. Particular focus should be given to benefits that serve to promote the equitable distribution of Environmental Burdens, or reduce any existing Environmental Burdens identified for the EJ population. Moreover, the Proponent is encouraged to invest in strategies that provide support and resources to the surrounding EJ neighborhoods. For example, the Proponent could consider commitments to employ a greater proportional of residents in surround EJ communities, monetary contributions to community activities (e.g., local sports teams, local non-profit organizations, or local infrastructure improvements).

Public Health

The DEIR should include a separate section on "Public Health," and discuss any known or reasonably foreseeable public health consequences that may result from the environmental impacts of the project. Particular focus should be given to any impacts that may materially exacerbate "vulnerable health EJ criteria," in accordance with the MEPA Interim Protocol for Analysis of EJ Impacts. In addition, other publicly available data, including through the DPH EJ Tool, should be surveyed to assess the public health conditions in the immediate vicinity of the project site, in accordance with 301 CMR 11.07(6)(g)10. Any project impacts that could materially exacerbate such conditions should be analyzed. To the extent any required Permits for the project contain performance standards intended to protect public health, the DEIR should contain specific discussion of such standards and how the project intends to meet or exceed them. The DEIR should discuss whether other nearby facilities are subject to MassDEP air permitting, and whether the cumulative impact of this project and nearby facilities would materially impact air quality in the area. The DEIR should provide available data from nearby air monitoring stations and report on whether existing air quality is under National Ambient Air Quality Standards (NAAQS) that are derived from public health risk standards.

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 (rather than a major 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. Comments from MassDEP indicate that the Department encourages this type of solid waste transfer facility to assist in managing Massachusetts waste, including the reuse/recycling of C&D materials. MassDEP indicates that proper waste management and waste diversion is important to conserve the state's declining landfill space and resources if accomplished in an environmentally sound manner.

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 enter the site from Tanzio Road and proceed in a counter-clockwise direction through the site. Trucks will first 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 is and 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 processed 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. Waste is then loaded onto a rail car parked within a rail loading bay in the west side of the building. 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.

According to the ENF, the facility was developed using state-of-the-art Best Management Practices (BMPs) to minimize potential impacts to the environment. The following BMPs are implemented at the Facility:

- All tipping, handling, and loading is performed within a fully-enclosed processing and handling building
- The building floor is impervious concrete that will prevent any potential contamination of groundwater. Any liquids released from the waste will be collected in a floor drain system. The liquid collected in this system is routed through an oil/water separator and discharged to the sanitary sewer system pursuant to site's existing discharge permit
- Use of a fine atomized misting system within the waste handling building effectively controls fugitive dust and odor in the building
- External paved surfaces are subject to daily cleanup and sweeping
- The site includes a stormwater management system that meets or exceed MassDEP Stormwater Management Standards

The DEIR should 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.

Noise

The ENF included a sound study which analyzed noise impacts associated with operation of the facility under proposed conditions. The analysis compared modeled noise levels to two ambient noise level scenarios: a "normal daytime" condition and an "end of day" condition, which reflects ambient noise levels for two hours (5:00 PM to 7:00 PM on weekdays and 1:00 PM to 3:00 PM on Saturdays) after active tipping operations. Ambient sound levels under "normal daytime" conditions ranged from 41

to 55 decibels (dBA) and ambient sound levels under the “end of day” scenario condition ranged from 39 to 44 dBA.

The following sources of noise associated with operation of the facility (both indoor and outdoor activities) were modeled:

- A front-end loader and two excavators operating (continuously) inside the building to move materials
- An idling haul truck inside the building (limited by the Proponent to no more than five minutes, per anti-idling regulations)
- A C&D recycling system inside the building, the noise from which is dominated by the electrically- powered screener
- Four elevated building ventilation fans (three on the west wall and one on the north wall)
- A front-end loader or skid steer operating continuously outside the building (however, in practice this occurs infrequently because waste handling occurs indoors)
- A railcar mover outside the building to move rail cars in the rail yard
- An idling haul truck outside the building (limited by the Proponent to no more than five minutes, per anti-idling regulations)
- A street sweeper outside of the building (not expected to operate continuously)
- A compactor outside of the building (not expected to operate continuously)
- Haul trucks traveling to and from the facility

The modeling results were compared to the standards of MassDEP’s Noise Policy (Policy Statement 90-001, February 1, 1990), which is used to assess nuisance noise levels defined in the Air Pollution Control Regulations at 310 CMR 7.10. The Noise Policy identifies violations of the regulation as occurring if the sources cause either an increase in the broadband sound pressure level of more than 10 dBA above the ambient sound level, or a "pure tone" condition. Future maximum sound levels were predicted at 22 residential receptors surrounding the facility. Under both the “normal daytime” scenario and the “end of day” scenario, predicted noise levels at all receptors were no more than 10 dbA higher than ambient levels. As stated above, the DEIR should discuss whether additional measures could be taken to reduce noise impacts, including through limitations on truck traffic or hours of operation. The DEIR should provide a thorough response to comments that raise noise concerns or suggest additional mitigation measures for this impact.

Odor

According to the ENF, the primary source of odor at the site is MSW, rather than C&D waste. The existing facility is permitted to store a maximum of 600 tons of MSW overnight within the building; however, according to the ENF, the Proponent implements a “first-in, first-out” policy for MSW or odorous waste, and the facility is operated so that no more than 100 tons of MSW is stored in the building overnight. Additional odor mitigation measures implemented at the facility include confining all waste handling activities to within the enclosed building, covering trailers, rail cars, and containers, an atomized misting system, use of odor counteractants in the misting system as necessary, and minimizing overnight stockpiles of MSW.

The ENF included an odor study to determine the potential odor impacts from the facility on residential and commercial receptors near the site. To provide a worst-case scenario, the study assumed that all the doors of the facility would be open at all times and that all the waste at the site is MSW; 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. Potential odor impacts were modeled using the AEROMOD dispersion model. The model provided estimates of odor intensity expressed as a dilution-to-threshold (D/T) value, which reflects the amount of air required to dilute an odor source to a point where less than 50% of the people will be able to detect it. The study established an impact threshold of 5 D/T for 15 minutes or more in residential areas; an odor intensity of 5 D/T would require 5 units of ambient air to dilute one unit of odorous air to an acceptable level. Two scenarios were modeled: 1) 150 tons per day of MSW were left on the tipping floor overnight, which reflects an increase from the Proponent's 100-ton policy limit consistent with the proposed 50% increase in waste capacity; and 2) 600 tons of MSW were left on the tipping floor overnight. Both modeling scenarios assumed that no odor mitigation measures were implemented. For the 150 tons of MSW scenario, the model determined a potential maximum hour concentration of 2 D/T at the nearest residences, and that an odor concentration of 5 D/T would be experienced 13 times for 15 minutes over a period of a year, which corresponds to 0.15% of the time. According to the ENF, no odor mitigation is required under the 150-ton scenario. Under the 600 tons of MSW scenario, the model determined the maximum hour concentration to be 8 D/T at the nearest residences, and that an odor intensity of 5 D/T would be experienced 480 times for a period of 15 minutes, which corresponds to 5.5% of the time. According to ENF, the 600-ton scenario requires mitigation due to the intensity of odor determined in the model.

The odor study also modeled the effect of odor mitigation measures to minimize impacts of the 600 tons of MSW scenario. The mitigation measures included the addition of an odor counteractant to the existing water misting system and exhaust filters on the exhaust fans; to provide a conservative estimate, the analysis assumed that two-thirds of the odor would be treated, and one-third of the odors would pass untreated through the open doors. Under this scenario, the maximum hour concentration at the nearest residences would be 5 D/T and that an odor intensity of 5 D/T would be experienced 127 times for a period of 15 minutes, which corresponds to 1.4% of the time.

According to the ENF, the policies, controls, and procedures currently implemented at the facility have been effective in preventing nuisance odor conditions, and the facility has operated since 2020 without odor complaints. The modeling results summarized above predict minimal odor impacts under expected operating conditions, and identify mitigation measures that could be implemented to minimize odors if more MSW were to be stored overnight than is currently stored. However, I received comments from residents from the neighborhood closest to the site that indicate that odors from the facility are detectable at those locations and have been reported to the Leominster Board of Health and MassDEP. In some cases, comment letters identified specific dates and locations where odors were detected. The odor modelling described above does not appear to account for odors emanating from loaded railcars stored outside the facility; 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, and identify mitigation measures implemented by the Proponent to minimize odors from exterior sources. The DEIR should include a review of any odor complaints received by MassDEP and the Leominster Board of Health, and the incidences identified in comment letters. Using information regarding the date and/or general location of the reported incidences, the Proponent should review weather conditions and any records maintained by the Proponent concerning the volume and type of

waste handled on those days to assess the conditions that were present and may have contributed to the odorous conditions. The DEIR should identify any operational measures and treatment practices that could be implemented to address conditions corresponding to the odor complaints. The DEIR should discuss how the Proponent will operate the facility to ensure that no more MSW is stored overnight on the tipping floor than 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.

Air Quality

The ENF included an Air Quality Study which evaluated emissions of particulate matter (PM_{10} and $PM_{2.5}$) at the project site by the following four sources associated with operation of the facility:

- Loading and unloading materials into and out of trucks inside the building
- Conveying, screening, and sorting of C&D inside the building
- Non-road diesel equipment exhaust emissions inside and outside the building
- On-road diesel trucks idling inside and outside the building

A summary of the facility-wide emissions of PM_{10} and $PM_{2.5}$ is shown in Table 1. The total emissions at the facility are below the 1 ton per year (tpy) air permitting threshold.

Table 1. Project emissions of particulate matter (tons per year). Derived from Table 1 in the Air Quality Study.

Emissions Source	PM_{10}	$PM_{2.5}$
Truck Loading/Unloading	0.064	0.008
C&D Processing	0.50	0.075
Non-Road Diesel Equipment Exhaust	0.032	0.031
On-Road Diesel Truck Idling Exhaust	0.071	0.065
Total	0.66	0.18

The Proponent used the U.S. Environmental Protection Agency's (EPA's) AERMOD air dispersion model to estimate the concentration of PM_{10} and $PM_{2.5}$ at receptors within a grid extending 3,280 feet (1,000 meters) in all directions from the property fence line. The model was used to predict the 24-hour average and annual average concentrations of $PM_{2.5}$ and the annual average concentration of PM_{10}. The modeling results showing the maximum modeled concentrations, which occurred at the property line, in comparison to the National Ambient Air Quality Standards (NAAQS) are shown in Table 2.

Table 2. Maximum modeled particulate matter concentrations (micrograms per cubic meter). Derived from Table 3 in the Air Quality Study.

Pollutant	Averaging Period	Project emissions	Background concentrations	Total concentration	NAAQS limit
$PM_{2.5}$	24-hour	1.9	16.7	18.6	35
$PM_{2.5}$	Annual	0.4	8.2	8.6	12
PM_{10}	Annual	11.0	45.0	56.0	150

According to the ENF, the maximum concentrations of particulate matter emitted at the project site were measured in the model at the property line, and the concentrations were modeled to decrease further away from the property line. As shown in Table 2, the project will not cause an exceedance of the NAAQS. According to the ENF, the project will also meet the lower $PM_{2.5}$ annual NAAQS of 9 micrograms per cubic meter promulgated by the EPA on February 7, 2024.

According to the ENF, measures to minimize air emissions from operation of the facility include handling all waste within the enclosed building, use of a water-based misting system in the building to control dust, and using equipment which complies with EPA emissions standards for diesel engines. The DEIR should identify any additional measures that can be implemented by the Proponent to further minimize air emissions associated with operation of the facility.

The DEIR should include an air quality analysis in accordance with the *MassDEP Guidelines for Performing Mesoscale Analysis of Indirect Sources (1991)*. Data on NOx, $PM_{2.5}$, PM_{10}, and Diesel Particulate Matter (DPM), in addition to GHG and VOCs, should be provided to the extent they are available for roadway segments included within the traffic study area used for the TIA. Additional analysis of air quality at intersections adjacent to EJ populations should be conducted in accordance with the Environmental Justice Scope above. I am aware that MassDEP has proposed regulatory changes to adopt the California Air Resources Board (CARB)'s Medium and Heavy Duty (MHD) engine and vehicle regulations. These MHD regulations include three parts: 1) GHG Phase 2 Standards for MHD Engines and Vehicles starting in model year (MY) 2025; 2) Heavy-Duty Omnibus Regulation which contains a comprehensive set of emission standards and other emission-related requirements for heavy-duty engines and vehicles, starting in MY 2025; and 3) Advanced Clean Trucks Regulation resulting in offers of zero emission vehicle (ZEV) sales starting in MY 2025 and ramping up to 55% of Class 2b-3, 75% of Class 4-8 and 40% of Class 7-8 tractor sales being ZEVs in MY 2035. Given this transition to a cleaner truck fleet as of MY 2025, it is my expectation that mitigation commitments relative to mobile source emissions will address diesel vehicle traffic; early adoption of future mandates relative to its truck fleet is strongly encouraged.

Traffic and Transportation

The ENF included a transportation study generally consistent with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014 which analyzed the impacts of the increased truck traffic associated with the project. It described existing and proposed roadway conditions, roadway and intersection volumes, and roadway safety issues. The analysis reviewed future conditions and vehicular operations under No Build and Build scenarios using a seven-year planning horizon. According to the ENF, all truck traffic will continue to enter and exit the site using the driveway off Tanzio Road; all trucks will use only Tanzio Road, Lancaster Street, and New Lancaster Road to travel between the site and the nearest exit on I-190. When exiting the site, project-generated traffic is prohibited from turning left onto the northern section of Tanzio Road in order to prohibit trucks from cutting through the residential area along Aspinwall Avenue and Malburn Street to access Lancaster Street. According to the ENF, all project-generated truck traffic will travel on the section of Route 117 south of the site between Tanzio Road and I-190. However, the DEIR should include an analysis of routes used by trucks accessing the site from other directions, such as packer trucks delivering waster to the site directly from curbside trash collection.

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 Road
- Tanzio Road at Site Driveway

The number of new truck trips was estimated based on the truck trips associated with existing operations. According to the ENF, inbound solid waste is delivered to the site with an average load of 9.4 tons per truck; therefore, under existing conditions, up to 107 truck deliveries per day (314 total truck trips) are generated by the facility to accept the maximum of 1,000 tpd. Under proposed conditions, a total of up to 160 truck deliveries (320 total trips per day) will be needed to deliver a maximum of 1,500 tpd of waste to the site, an increase of 54 truck deliveries (108 total additional truck trips). In addition, the number of outbound trucks transporting recyclables from the site to other processing facilities will increase from 5 (10 truck trips total) to 7 (14 total truck trips). Based on these calculations, the total number of truck trips associated with the facility will increase from 224 under existing conditions to 334 truck trips under proposed conditions, an increase of 110 truck trips. These calculations are based on the use of rail to transport all waste material off-site. According to ENF, if trucks were used to transport waste off-site, the total number of truck trips under existing conditions would be 286 trips, which would increase by 142 trips to 428 truck trips under proposed conditions; however, trucks have not been used to transport waste off-site in the past and the Proponent proposes to continue to use only rail for this purpose. According to the ENF, project-generated truck trips are distributed fairly evenly during the day, with eight new truck trips (a total of 22 truck trips for the entire facility including existing truck trips) during the AM peak period and two new truck trips (eight total truck trips) during the PM peak period. The DEIR should provide additional documentation in support of the estimate of new truck trips that will be generated by the project. It should describe the type and capacity of trucks that will bring waste to the site. The DEIR should document that the use of an average of 9.4 tons of waste per truck accurately reflects the range in truck sizes that will transport waste to the site; according to the Air Quality Study included in the ENF, C&D waste tends to be delivered in smaller trucks

The ENF provided 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.

Existing 2023 conditions were established using turning movement counts (TMCs) collected in March, 2023. The No Build 203 condition incorporates a 2.0% compounded annual growth rate added to traffic volumes under Existing 2023 conditions. Build 2030 conditions include the addition of project-generated truck trips to the No Build 2030 scenario. According to the ENF, all study area intersections will operate LOS C or better during peak periods under all the No Build and Build scenarios, and no changes in LOS are expected from No Build 2030 to Build 2030 conditions. No mitigation was proposed in the ENF 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 2030 and Build 2030 scenarios.

The 2018 ENF indicated that the project will generate 42 average daily trips (adt) associated with employee trips to and from the site; however, the ENF currently under review did not identify the project's non-truck vehicle trip generation. The DEIR should quantify the daily and peak period employee vehicle trip generation, and identify any impacts on study area intersections associated with the project's total trip generation (employees and trucks) under proposed conditions.

The DEIR should provide additional analysis of truck operations that are not reflected by the capacity analysis, including a description of queuing of trucks that are waiting to enter the site prior to the opening of the facility or during periods when the facility is at capacity with respect to the number of trucks that can be managed on-site. The DEIR should 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; quantify the number and hourly distribution of said trucks; and provide an analysis of traffic operations at affected intersections. As noted above, the potential impacts of these trucks on EJ populations with respect to noise, odor, and trash should be evaluated.

Climate Change

Adaptation and Resiliency

Effective October 1, 2021, all new projects are required to submit an output report from the MA Resilience Design Tool to assess the climate risks of the project. Based on the output report attached to 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 and the 90th heat percentile when planning for extreme heat conditions. The recommendations for extreme precipitation appear to be based on a "Medium" criticality assessment of the project. According to the ENF, the existing stormwater management stormwater management system was designed to accommodate up to the present-day 100-year storm event and incorporated infiltration to the maximum extent practicable. According to the ENF, both the 100-year and 500-year flood elevations 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.

The DEIR should include an assessment of the resilience of the facility under projected 2070 climate conditions using data available through the MA Resilience Design Tool. The DEIR should describe the components of the stormwater management system, including measures required of land uses with higher potential pollutant loads, and compare its capacity to precipitation depths under projected storm conditions. The DEIR should describe any measures incorporated into the design of the existing facility, including its stormwater management system, that will provide resiliency to the identified climate risks. It should identify potential adaptation strategies that could be implemented in the future, if necessary, to respond to unanticipated climate risks.

Greenhouse Gas (GHG) 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.[4] The DEIR should report on the anticipated GHG emissions using this tool. The ENF indicates that no changes are proposed to the building and, therefore, it did not provide an analysis of the project's GHG stationary or mobile source emissions. If stationary source emissions for conditioned spaces exceed 2,000 tpy, the DEIR should provide a GHG analysis in accordance with the 2010 MEPA GHG Policy.

The DEIR should include an evaluation of potential GHG emissions associated with the project's mobile source emissions. The DEIR should follow the guidance provided in the GHG Policy for *Indirect Emissions from Transportation* to determine mobile emissions for Existing Conditions, Build Conditions, and Build Conditions with Mitigation. The DEIR should describe truck loading and staging activities and estimate GHG emissions from idling. The Proponent should thoroughly explore means to reduce overall single occupancy vehicle trips and to minimize air emissions from diesel vehicle traffic. The DEIR should also review measures to promote the use of low-emissions vehicles, including installing EV charging stations and providing designated parking spaces for these vehicles (a minimum of 25% of proposed spaces) with the balance of spaces being EV ready for future installation.[5] The Build with Mitigation model should incorporate TDM measures, and any roadway improvements implemented by the project, and document the associated reductions in GHG emissions. The DEIR should explain how TDM measures will be monitored and adjusted over time and provide a methodology for quantifying emission reductions impacts rather than an assumed percentage reduction.

Mitigation and Draft Section 61 Findings

The DEIR should include a separate chapter summarizing all proposed mitigation measures including construction-period 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, 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.

Responses to Comments

The DEIR should contain a copy of this Certificate and a copy of each comment letter received on the ENF. The DEIR should contain a direct response to the scope items in this Certificate. The DEIR should include direct responses to comments on the ENF and the scope items in this Certificate that

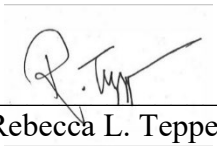
[4] https://www.mass.gov/doc/ghg-emissions-calculator/download
[5] More information on EV infrastructure can be obtained from the MassEVolves program at www.massevolves.org.

specifically address each issue raised in the comment letter or Certificate; references to a chapter or sections of the DEIR alone are not adequate and should only be used, with reference to specific page numbers, to support a direct response. This directive is not intended to, and shall not be construed to, enlarge the Scope of the DEIR beyond what has been expressly identified in this certificate.

Circulation

In accordance with 301 CMR 11.16, the Proponent should circulate the DEIR to each Person or Agency who commented on the ENF, 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. Pursuant to 301 CMR 11.16(5), the Proponent may circulate copies of the DEIR to commenters 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 DEIR should be made available for review in the Leominster Public Library.

December 9, 2024
Date



Rebecca L. Tepper

Comments received:

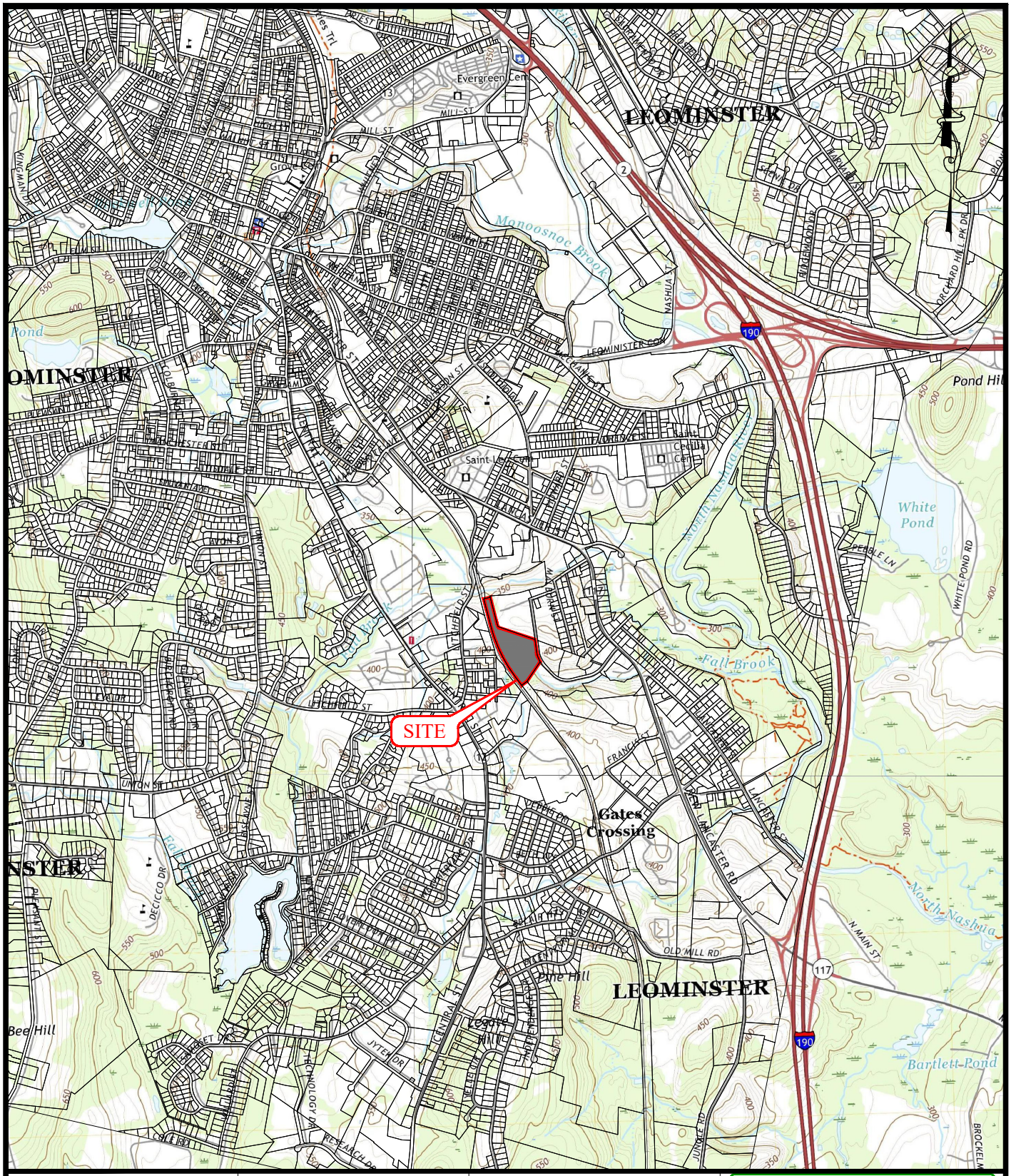
10/01/2024 Michelle Powell
10/04/2024 Deb Buckley
10/07/2024 Paul Brayton
10/10/2024 Frank Bangrazi
10/14/2024 David Dill
10/14/2024 Lisa Christy
10/14/2024 Steven Allain
10/15/2024 Massachusetts Department of Transportation (MassDOT)
10/16/2024 Terri Stymiest
11/12/2024 Yancarlos Alvarez
11/13/2024 Vincent Seretto
11/29/2024 Massachusetts Department of Environmental Protection (MassDEP)/Central Regional Office (CERO)

RLT/AJS/ajs

ATTACHMENT 2

PROJECT PLAN SET:

LOCUS PLAN- EX-1
WATER RESOURCES PLAN- EX-2
LAND USE PLAN- EX-3
ZONING PLAN- EX-4
EJ POPULATION PLAN- EX-5
EXISTING/PROPOSED EXTERIOR LAYOUT PLAN- C-1
EXISTING/PROPOSED INTERIOR LAYOUT PLAN- C-2
TRAFFIC PATTERN PLAN- C-3



NOTE: USGS TOPOGRAPHIC MAP WAS PROVIDED BY THE OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MassMapper), COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS CURRENT TO JUNE 2021.

REVISIONS	
NO./ DATE	COMMENT

DRAWING TITLE:

SITE LOCUS MAP

CAD TECH:	CHECKED BY:
D. HAZEN	L. BUGAY
ENGINEER:	DATE:
L.BUGAY	5/22/2024

PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

Green Seal Environmental, LLC
114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
Fax: (508) 888-1506
www.gseenv.com

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

SCALE:

1" = 2,500'

SHEET:

EX-1

0.5 MILE RADIUS FROM PROPERTY BOUNDARY

LANCASTER STREET (RTE 117)

WELL ID: 258974
511 LANCASTER STREET

500 FOOT RADIUS FROM PROPERTY BOUNDARY

RESERVOIR BROOK

FALL BROOK

100-FOOT WASTE HANDLING AREA SETBACK

CSX CORPORATION RAILROAD

TANZIO ROAD

SOLID WASTE HANDLING FACILITY

WELL ID: 261137
8 REED STREET

WELL ID: 272701
CRISCI STREET
(STREET # NOT PROVIDED)

FALL BROOK

LITCHFIELD STREET

SITE

WELL ID: 272723
TANZIO ROAD
(STREET # NOT PROVIDED)

MEDIUM YIELD AQUIFER (TYP)

BROOK (UNNAMED)

NHESP CERTIFIED VERNAL POOL

WELL ID: 137336
30 HUDSON STREET

200' OUTER RIPARIAN ZONE TO RIVERFRONT AREA (TYP)

100' WETLAND BUFFER ZONE (TYP)

100 YEAR FLOOD LIMIT (TYP)

WETLAND (TYP)

WELL ID: 258693
823 LANCASTER STREET

LITCHFIELD STREET

CENTRAL STREET (RTE 12)

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LEGEND

- DEP WETLANDS
- 100' BUFFER ZONE
- MEDIUM YIELD AQUIFER
- NHESP CERTIFIED VERNAL POOL
- PRIVATE WELL
- SITE SETBACK
- SITE PROPERTY LINES
- ABUTTER PROPERTY LINE
- FEMA 100 YEAR FLOOD LIMIT
- 200' OUTER RIPARIAN ZONE TO RIVERFRONT AREA
- STREAM

LEGEND OF FEATURES NOT FOUND

THE FOLLOWING FEATURES WERE SEARCHED FOR AND NOT FOUND WITHIN THE AREA DEPICTED ON THE PLAN:

- ZONE A
- ZONE B
- ZONE I
- ZONE II
- IWPA
- PROPOSED DRINKING WATER SOURCE AREAS
- HIGH YIELD AQUIFER
- MUNICIPAL SUPPLY WELL
- PUBLIC WATER SUPPLY WELL
- POTENTIAL VERNAL POOL

NOTES:

1. THE INFORMATION SHOWN ON THIS PLAN WAS OBTAINED FROM MASSMAPPER.
2. WELL RECORDS WERE RESEARCHED AT MASS.GOV EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS DATA PORTAL AND CITY OF LEOMINSTER HEALTH DEPARTMENT.
3. PROPOSED DRINKING WATER SOURCE AREAS RESEARCHED ON MASSDEP WATER MANAGEMENTACT PERMITS AND DECISIONS WEBSITE

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114 State Road, Building B
Sagamore Beach, MA 02562
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Fax: (508) 888-1506
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REVISIONS

NO.	DATE	COMMENT
1	02/20/26	MASSGIS FLOODPLAIN UPDATE

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

DRAWING TITLE:

WATER RESOURCES PLAN

CAD TECH:	CHECKED BY:
D. HAZEN	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	5/22/2024
	SCALE: 1" = 200'
	SHEET: EX-2

\\GREEN-SEAL\DATA\OLD_WASTE DEPARTMENT\CLIENTS\UNITED WASTE MANAGEMENT LEOMINSTER\ACTIVE\DRAWINGS\DRAWINGS 2025-2026\SITE SUITABILITY\CAD\REVISED FOR FEMA\LEOMINSTER FIGURES.DWG

ST LEO'S CEMETERY

0.5 MILE RADIUS FROM PROPERTY BOUNDARY

NHESP ESTIMATED HABITATS OF RARE WILDLIFE

NHESP PRIORITY HABITATS OF RARE SPECIES

LANCASTER STREET (RTE 117)

SOLE PROPRIETOR SOCIAL WORKER

FARMLAND OF UNIQUE IMPORTANCE (TYP)

FULLER STREET CONSERVATION AREA

PRIME FARMLAND (TYP)

500 FOOT RADIUS FROM PROPERTY BOUNDARY

RESERVOIR BROOK

LEOMINSTER LASSIE LEAGUE FIELD COMPLEX

LINCOLN WOODS

FARMLAND OF STATEWIDE IMPORTANCE (TYP)

AREA OF CRITICAL ENVIRONMENTAL CONCERN (TYP)

SOLID WASTE HANDLING FACILITY

CSX CORPORATION RAILROAD

TANZIO ROAD

LITCHFIELD STREET

JOHNNY APPLESEED STATE PARK

100 FOOT WASTE HANDLING AREA SETBACK

SITE INDUSTRIAL DISTRICT

EAGLES FIELD

LITCHFIELD STREET

CENTRAL STREET (RTE 12)

OLD DEERFIELD WOODS ESTATES CONSERVATION AREA

TAK CENTER FOR MENTAL HEALTH-MEDICAL OFFICE

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LEGEND

- FARMLAND OF UNIQUE IMPORTANCE
- FARMLAND OF STATEWIDE IMPORTANCE
- PRIME FARMLAND
- AREA NO LONGER FARMLAND
- CONSERVATION LAND
- CONSERVATION AND RECREATION AREA
- HISTORICAL/CULTURAL AREA
- AREAS OF CRITICAL ENVIRONMENTAL CONCERN
- NHESP ESTIMATED HABITATS OF RARE WILDLIFE
- NHESP PRIORITY HABITATS OF RARE SPECIES
- SITE SETBACK
- WASTE HANDLING AREA SETBACK
- SITE PROPERTY LINES
- ABUTTER PROPERTY LINE
- HEALTHCARE

LEGEND OF FEATURES NOT FOUND

THE FOLLOWING FEATURES WERE SEARCHED FOR AND NOT FOUND WITHIN THE AREA DEPICTED ON THE PLAN:

- STATE FORESTS
- OTHER SOLID WASTE FACILITIES
- WILDLIFE MANAGEMENT AREAS
- MDC RESERVATIONS

NOTES:

1. THE INFORMATION SHOWN ON THIS PLAN WAS OBTAINED FROM MASSGIS.
2. NO PRISONS, CHILDREN'S PRE-SCHOOLS, ELEMENTARY SCHOOLS, MIDDLE SCHOOLS, HIGH SCHOOLS, DAYCARES, SENIOR CENTERS OR YOUTH CENTERS WERE FOUND WITHIN A ONE-HALF MILE RADIUS OF THE SITE.
3. SEE FIGURE 4 FOR ZONING AND OVERLAY MAP.
4. NO OTHER SOLID WASTE FACILITIES WERE FOUND WITHIN ONE-HALF MILE OF THE SITE.

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114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
Fax: (508) 888-1506
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REVISIONS

NO.	DATE	COMMENT

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

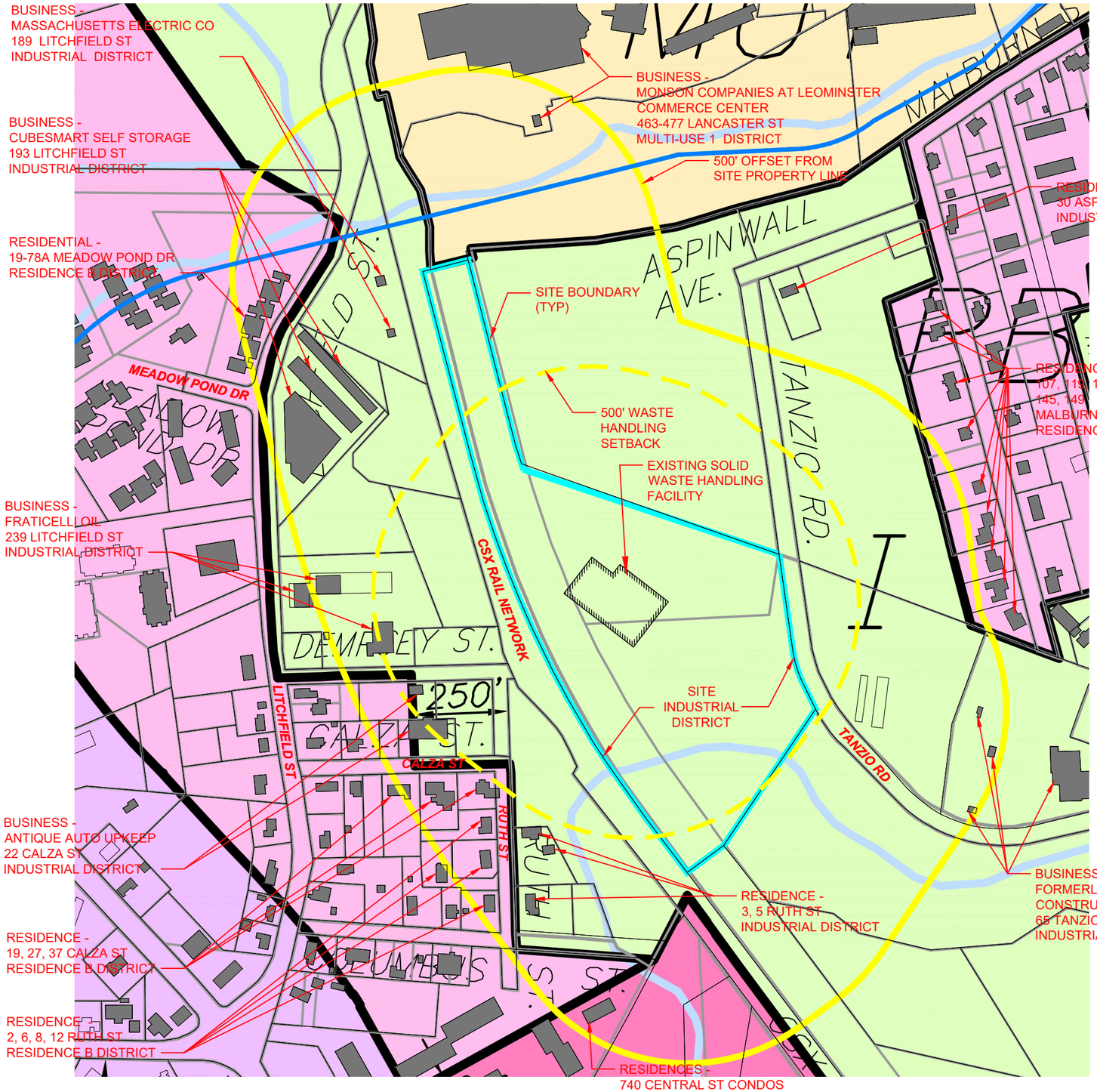
PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

DRAWING TITLE:

LAND USE PLAN

CAD TECH:	CHECKED BY:
D. HAZEN	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	5/22/2024
	SCALE: 1" = 200'
	SHEET: EX-3



January 14, 2013

Sheet 1 of 2:

Water Supply Protection and Underlying Districts

LEGEND

- WSP — WATER SUPPLY PROTECTION DISTRICT

UNDERLYING DISTRICTS:

- RR — RURAL RESIDENCE AND AGRICULTURE
- RA — RESIDENCE A
- RB — RESIDENCE B
- RC — RESIDENCE C
- BA — BUSINESS A
- BB — BUSINESS B
- C — COMMERCIAL
- I — INDUSTRIAL
- MU1 — MULTI-USE 1
- MU2 — MULTI-USE 2
- V — VILLAGE
- AREA OF CITY DEPICTED ON SHEET 2
- INTERSTATE HIGHWAY
- STATE NUMBERED ROUTE
- PUBLIC OR PRIVATE STREET OR WAY
- HIGHWAY OR STREET TRAVEL LANE
- PARCEL PROPERTY LINE
- WATER BODY
- WATER COURSE
- EXISTING STRUCTURE
- SITE PROPERTY LINES

NOTE:

THE INFORMATION SHOWN ON THIS PLAN WAS OBTAINED FROM THE CITY OF LEOMINSTER AND MASSMAPPER.

Green Seal Environmental, LLC
114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
Fax: (508) 888-1506
www.gseenv.com

REVISIONS

NO.	DATE	COMMENTS

PROJECT:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

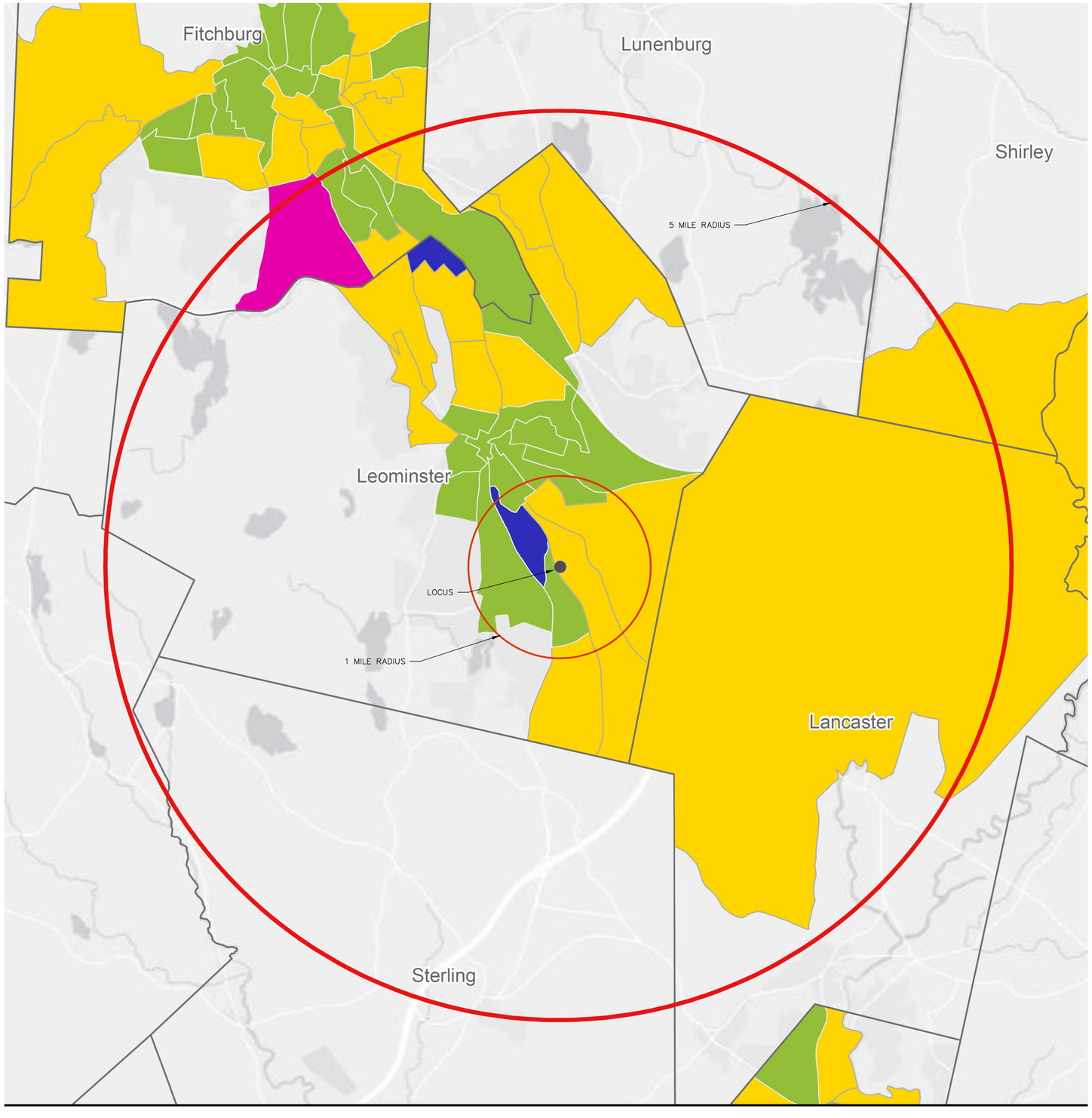
PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

DRAWING TITLE:

ZONING & OVERLAY MAP

ENGINEER: L. BUGAY
CAD TECH: D. HAZEN
CHECKED BY: L. BUGAY
SCALE: Not to Scale
DATE: 5/22/2024
SHEET: EX-4



Minority: the block group minority population is >= 40%, or the block group minority population is >= 25% and the median household income of the municipality the block group is in is < 150% of the Massachusetts median household income

Income: at least 25% of households have a median household income 65% or less than the state median household income

Language isolation: 25% or more of households do not include anyone older than 14 who speaks English very well

Minority and Income

Minority and English isolation

Income and English isolation

Minority, Income and English isolation

NOTES:
1. THESE DATA WERE OBTAINED FROM https://www.mass.gov/info-details/massgis-data-2020-environmental-justice-populations
2. PER GUIDELINES, PROJECT IS SUBJECT TO THE 1-MILE DESIGNATED GEOGRAPHIC AREA (DGA) FOR ENVIRONMENTAL JUSTICE RELATED PROTOCOLS.



LOCUS MAP
N.T.S.

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114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
Fax: (508) 888-1506
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REVISIONS

NO.	DATE	COMMENT

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

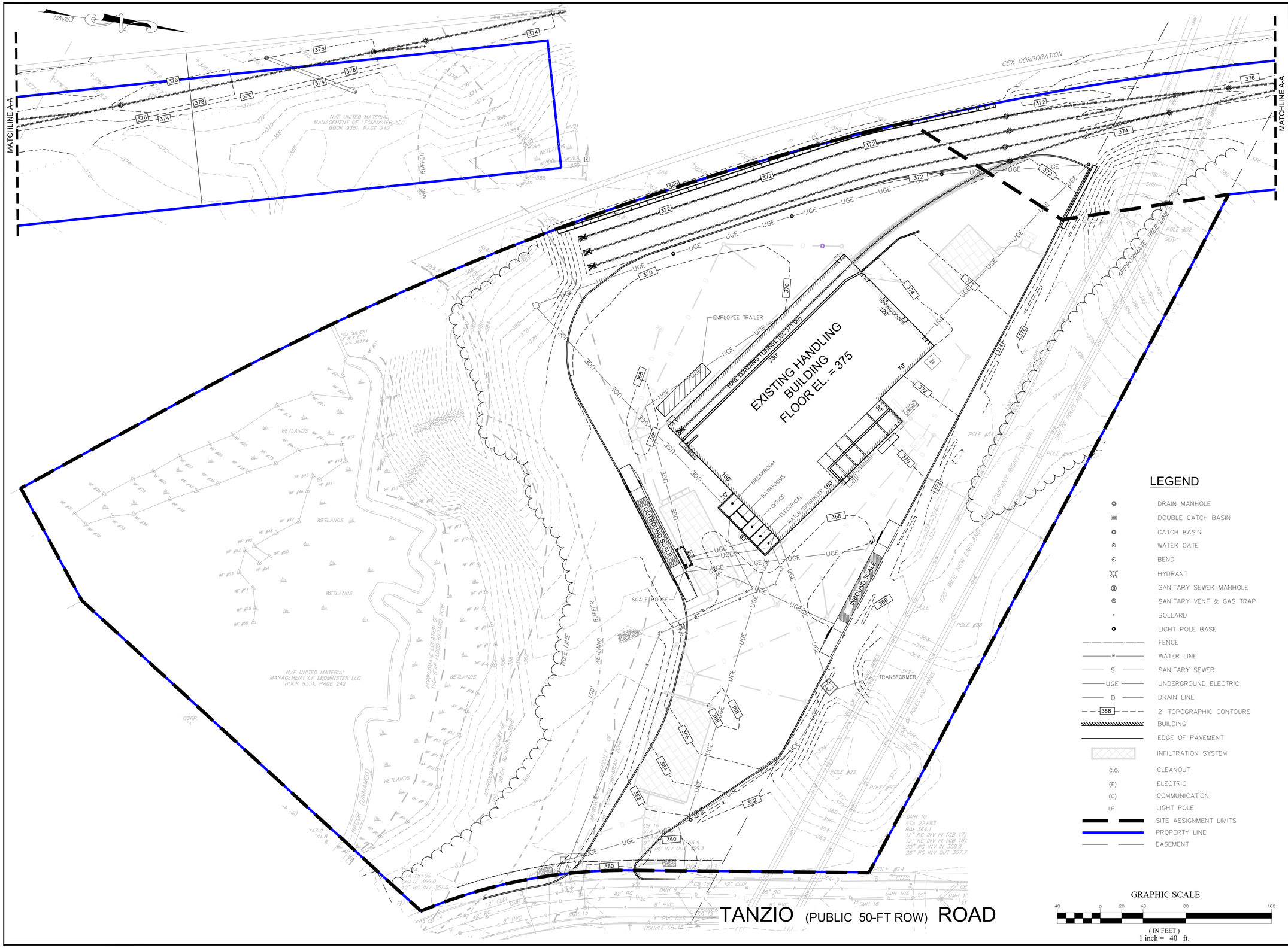
PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

DRAWING TITLE:

ENVIRONMENTAL JUSTICE POPULATIONS 2020

CAD TECH:	CHECKED BY:
D. HAZEN	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	5/22/2024
	SCALE: 1"=3000'
	SHEET: EX-5



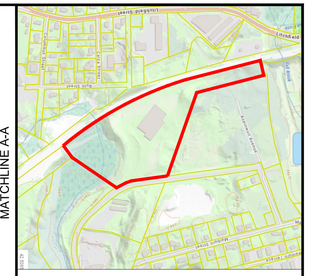
LEGEND

- DRAIN MANHOLE
- DOUBLE CATCH BASIN
- CATCH BASIN
- WATER GATE
- BEND
- HYDRANT
- SANITARY SEWER MANHOLE
- SANITARY VENT & GAS TRAP
- BOLLARD
- LIGHT POLE BASE
- FENCE
- W — WATER LINE
- S — SANITARY SEWER
- UGE — UNDERGROUND ELECTRIC
- D — DRAIN LINE
- 368 — 2' TOPOGRAPHIC CONTOURS
- BUILDING
- EDGE OF PAVEMENT
- INFILTRATION SYSTEM
- C.O. — CLEANOUT
- (E) — ELECTRIC
- (C) — COMMUNICATION
- LP — LIGHT POLE
- SITE ASSIGNMENT LIMITS
- PROPERTY LINE
- EASEMENT

GRAPHIC SCALE

40 0 20 40 80 160

(IN FEET)
1 inch = 40 ft.



LOCUS MAP
N.T.S.

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114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
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REVISIONS

NO.	DATE	COMMENT

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

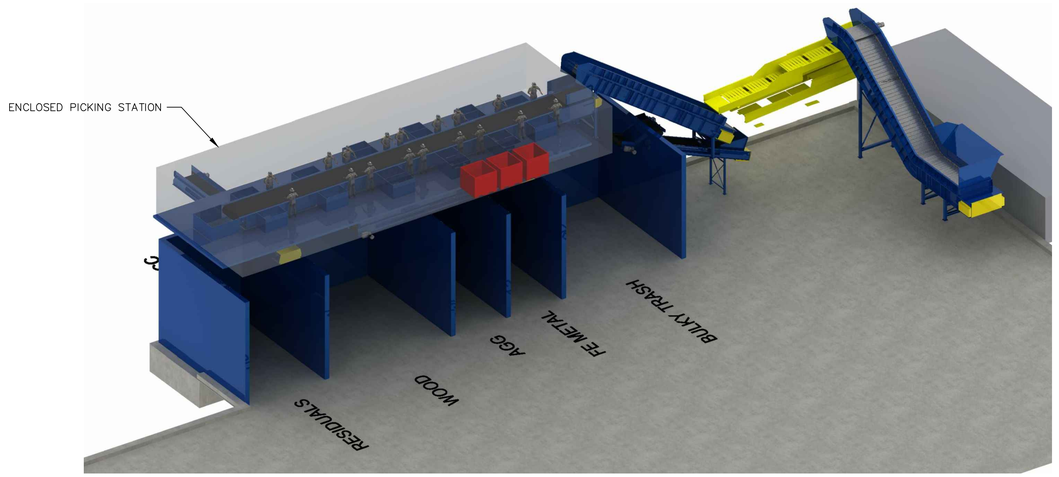
PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

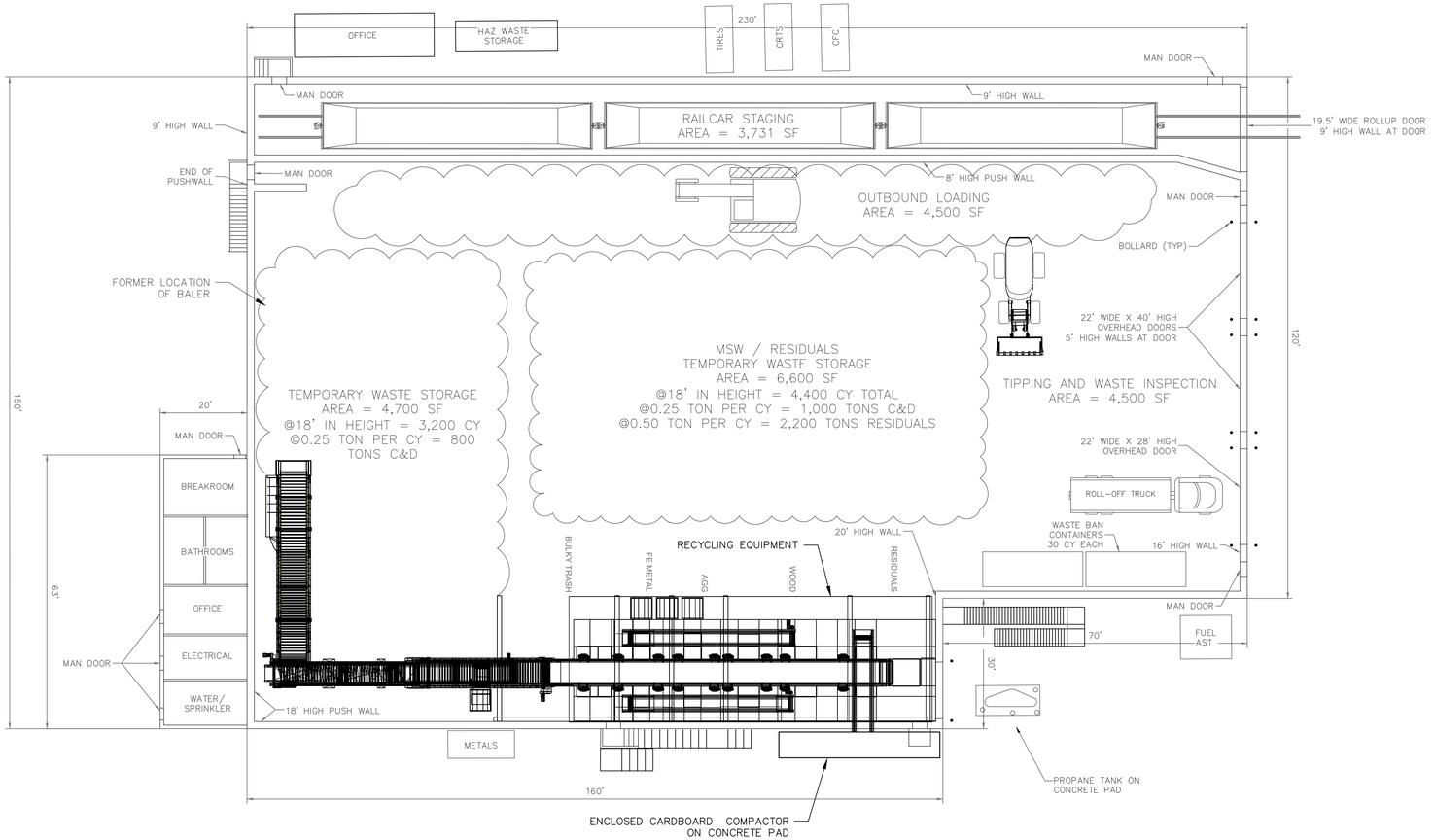
DRAWING TITLE:

EXISTING AND PROPOSED CONDITIONS PLAN - EXTERIOR

CAD TECH:	CHECKED BY:
M. MIXON	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	8/15/2024
	SCALE: 1"=40'
	SHEET: C-1



GENERAL ARRANGEMENT FOR
RECYCLING EQUIPMENT
NOT TO SCALE



NOTE: LOCATION OF WASTE BAN CONTAINERS
AND/OR RECYCLING CONTAINERS MAY VARY

INTERIOR LAYOUT
SCALE:1/16" = 1'-0"



LOCUS MAP
N.T.S.

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114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
Fax: (508) 888-1506
www.gseenv.com

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REVISIONS

NO.	DATE	COMMENT

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

PREPARED FOR:

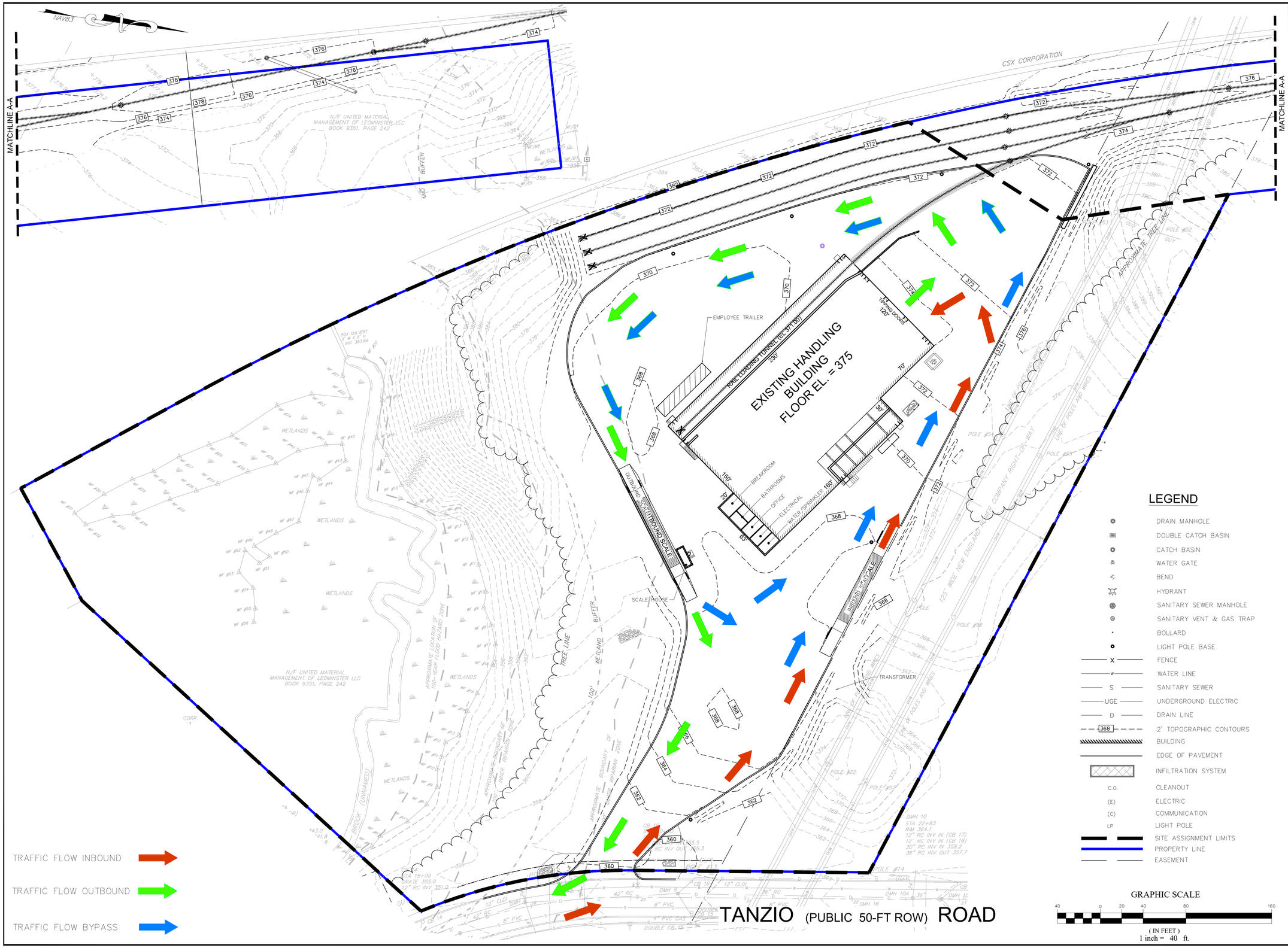
UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

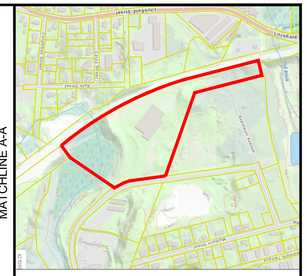
DRAWING TITLE:

EXISTING AND PROPOSED CONDITIONS PLAN - INTERIOR

CAD TECH:	CHECKED BY:
D. HAZEN	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	5/22/2024
	SCALE: AS NOTED
	SHEET: C-2

S:\Solid Waste Department\Clients\United Waste Management (Leominster)\Active\Permitting\Tonnage Increase 2023-2025\Site Suitability\CAD\Figure 6.dwg





LOCUS MAP
N.T.S.

LEGEND

- DRAIN MANHOLE
- DOUBLE CATCH BASIN
- CATCH BASIN
- WATER GATE
- BEND
- HYDRANT
- SANITARY SEWER MANHOLE
- SANITARY VENT & GAS TRAP
- BOLLARD
- LIGHT POLE BASE
- FENCE
- WATER LINE
- SANITARY SEWER
- UNDERGROUND ELECTRIC
- DRAIN LINE
- 2' TOPOGRAPHIC CONTOURS
- BUILDING
- EDGE OF PAVEMENT
- INFILTRATION SYSTEM
- C.O. CLEANOUT
- (E) ELECTRIC
- (C) COMMUNICATION
- LP LIGHT POLE
- SITE ASSIGNMENT LIMITS
- PROPERTY LINE
- EASEMENT

GRAPHIC SCALE

40 0 20 40 80 160

(IN FEET)
1 inch = 40 ft.

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REVISIONS

NO.	DATE	COMMENT

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

DRAWING TITLE:

TRAFFIC PATTERN PLAN

CAD TECH:	CHECKED BY:
M. MIXON	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	8/15/2024
	SCALE: 1"=40'
	SHEET: C-3

ATTACHMENT 3

COMMUNITY OUTREACH/ PUBLIC INVOLVEMENT PLAN (PIP)

Project Background and Purpose of PIP

Introduction

This Public Involvement Plan (PIP) outlines the actions and efforts planned to obtain meaningful public comment from the community for the United Materials Management of Leominster Expansion Project. This document will be updated as necessary as the Project progresses through permitting to capture any identified appropriate changes in outreach strategy.

Project Background

United Materials Management of Leominster (UMML) is a rail-served solid waste handling and transfer station located at 200 Tanzio Road in Leominster, Massachusetts. The Facility has been in operation since May of 2020, as a 1,000 ton per day Facility that accepts Municipal Solid Waste and Construction and Demolition Debris. The Facility is located on a 13.46-acre parcel of land within an Industrial Park and includes an access driveway, parking areas, an existing 32,500-square-foot building with a metal frame and sheathing, and rail spur and siding.

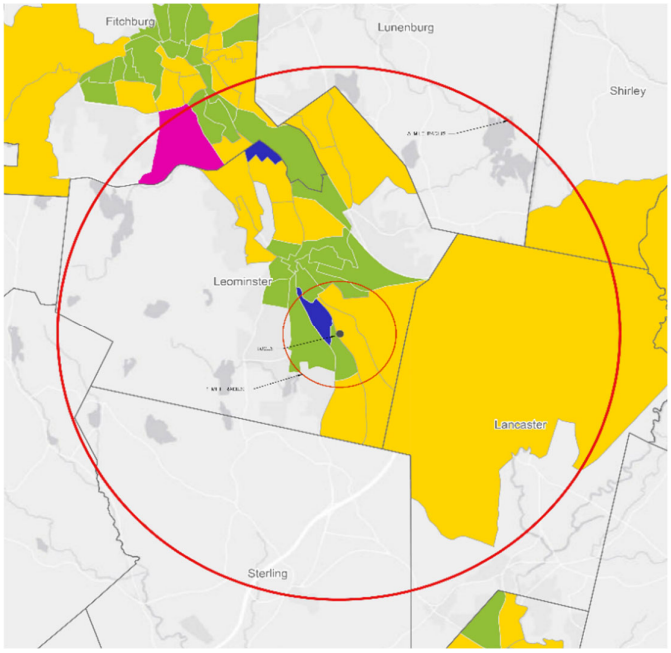
Purpose of PIP

As UMML is requesting to increase its daily tonnage from 1,000 tons per day (tpd) to 1,500 tpd, which is considered an Expansion per 301 CMR 11.03(9), there are permitting efforts associated with obtaining approval. As part of the initial permitting step through the Executive Office of Environmental Affairs, MEPA Office, this PIP has been requested.

Existing Community Conditions

EJ Populations in DGA

The Project's Designated Geographic Area (DGA) for which Environmental Justice-related outreach is based upon is determined by whether or not the Project will either exceed any air threshold at 301 CMR 11.03(8) or generate greater than 150 or more adt of diesel traffic over a duration of 1 year or more. As this Project will not exceed or generate either impacts noted, the DGA is a 1-mile radius. The below figure summarizes the EJ communities surrounding the project area and those within the 1-mile DGA. A larger Figure with expanded legend is included as Attachment 1.



	UMML site
	1 and 5-mile radii
	Minority
	Minority and income
	Minority, income, and English isolation
	Minority and English isolation

Existing Health Vulnerabilities

The DPH EJ Tool shows that the City of Leominster contains one Vulnerable Health EJ neighborhood, for heart attack criteria.

Potential Impacts and Mitigation

Potential Impacts

There will be no physical building expansion to the existing Facility for this Project. The potential environmental and public health impacts to the local EJ Population are expected to be limited to that associated with traffic, however, will not necessarily lead to more vehicles in the surrounding EJ areas. There will be more vehicle activity with the increased capacity but mainly at the Facility.

The Facility provides a local outlet for locally-generated waste so that vehicles already travelling on local roads won't have to travel as far to dispose/recycle waste materials, which saves fuel and reduces emissions. The increased vehicle activity and the associated emissions will be mitigated through compliance with MassDEP's Anti-Idling law, Tier IV-compliant vehicle usage, and facility design that includes two truck scales to minimize time trucks are on site and air handling systems for equipment operating inside. EPA's March 2024, Greenhouse Gas Emissions Standards for Heavy Duty Vehicles – Phase 3 Rule will further regulate GHG emissions from refuse and tractor trailer heavy duty trucks starting in 2027 that will further reduce GHG emissions associated with this project.

Mitigation and BMPs

The Facility's advanced Best Management Practices for air quality include:

1. Enclosing all tipping, handling, and loading operations within the handling building.
2. Utilizing a misting system in the handling building to control dust and odor.
3. Conducting daily cleanups and sweeping.
4. Using covered transportation for trucks and railcars.
5. Applying first in/first out procedures to reduce the time municipal solid waste (MSW) remains on site, minimizing the potential for nuisance conditions.
6. Using two vehicle scales to increase efficiency and minimize time trucks are on site.

UMML will continue to utilize advanced sorting equipment for the recovery of recyclables and use low-carbon rail for transport. These efficiencies preserve natural resources and reduce CO_2 emissions as moving waste by rail is four times more fuel efficient than using tractor trailers.

Outreach Strategy

Notification

Notification of upcoming public meetings will include the following at a minimum:

1. Post notice in City Hall, Spanish American Center, Leominster Library
2. Publish in Sentinel (English) and Vocero (Spanish)
3. Send notice to Project Distribution list
4. Send notices to City for inclusion on City calendar
5. Post notice on website
6. Post in Environmental Monitor (for MEPA submittals and MassDEP Site Suitability)

Notice of submittals to MEPA will include the following at a minimum:

1. Post in Environmental Monitor as required
2. Post in Sentinel (English) and Vocero (Spanish), as required
3. Send notice to Project Distribution list
4. Post on project website

Notice of Minor Modification to Site Assignment Hearing (post-MEPA process) will include the following at a minimum:

1. Post on project website
2. Notify Distribution List
3. Notify MassDEP distribution list per 310 CMR 16.08(2)
4. Notify Abutters via certified mail
5. Publish in Sentinel (English) and Vocero (Spanish)
6. Send notice to Spanish American Center

Notifications of Public Meetings will occur approximately 2 weeks in advance, and no later than 3 days in advance in accordance with Open Meeting law, unless otherwise required by regulations.

Outreach Efforts

In addition to providing Advance Notification of the ENF submittal and hosting a public meeting, UMML has reached out not only to the Spanish American Center, but to other City Departments like the Cultural Council and Mayor's office. A website was established, as described below, to function as a single-source of information and communication platform as part of outreach. Fact Sheets have been prepared in both English and Spanish (see Attachment 4).

UMML continues to communicate with the City throughout the permitting process.

Continued on next page

Outreach Strategy, Continued

Public Meetings

The anticipated Public Meetings for the Project include the following:

1. Pre-MEPA filing Advance Notification: June 19, 2024 (translation services were provided)
2. MEPA Site Walk and Public Meeting following ENF submittal and notice in Environmental Monitor: November 13, 2024 (translation services were provided)
3. Pre-DEIR filing Meeting, as requested by MEPA: June 24, 2025 (translation services were offered by request)
4. Pre-FEIR filing Meeting, if requested by the community
5. Post-MEPA Site Assignment Modification Hearing(s): anticipated April 2026

Public Engagement

The Public engagement strategy for the Project includes the following:

1. Provide Advance Notification of the Project to the Project-Specific EJ Distribution List that includes Community based organizations, indigenous organizations, tribes, City officials, and other appropriate organizations, residents, etc., that requests to be on contact list or comments on submittals/reports.
2. Hold required and requested Public Meetings throughout the Project, as further identified in the Public Meeting section above.
3. Hold Public meetings during evening hours at accessible City locations near public transportation, as feasible.
4. Continue to communicate with public officials (State Representative, Mayor's office, Spanish American Center, and local City officials).
5. Continue outreach and notification of upcoming submittals and public meetings to Project Distribution List as amended and updated throughout the process.
6. Maintain and update Project website and Distribution List.
7. Provide online virtual tour video of Facility on the Project website which will include Spanish translation.
8. Post virtual tour flyer on community bulletin boards with QR code to view virtual tour and link to Project website for more information.
9. Provide Project Summary in both English and Spanish.
10. Conduct "door-knocking" at nearby residences upon submittal of ENF.

Continued on next page

Outreach Strategy, Continued

Public Engagement, Continued

11. Posting notice of upcoming meetings in both English and Spanish community newspapers.
12. Establish Information Repository of Project reports and communications at the Leominster Library.
13. Respond to and engage with residents and those who've commented during the MEPA process, as requested.

Strategies 2, 3, 4, 5, 6, 7, 9, 10, 11, 12 listed above are consistent with those identified in the MEPA EJ Public Involvement Protocol.

Continued on next page

Outreach Strategy, Continued

Communication

A Project website was established as a source for information and to facilitate communication on the Project:

www.ummleominster.com

The website functions as an information repository with links to Project factsheets, copies of submitted reports, presentations, public notices, virtual tour video, and distribution list. The website will also provide updated schedules of upcoming hearings and public comment periods; and will provide a contact for questions or requests to be added to the Distribution/Contact list. Translation services will be provided as requested, during public meetings. The Project website will be continually updated throughout the MEPA permitting process.

Advance Notification Summary

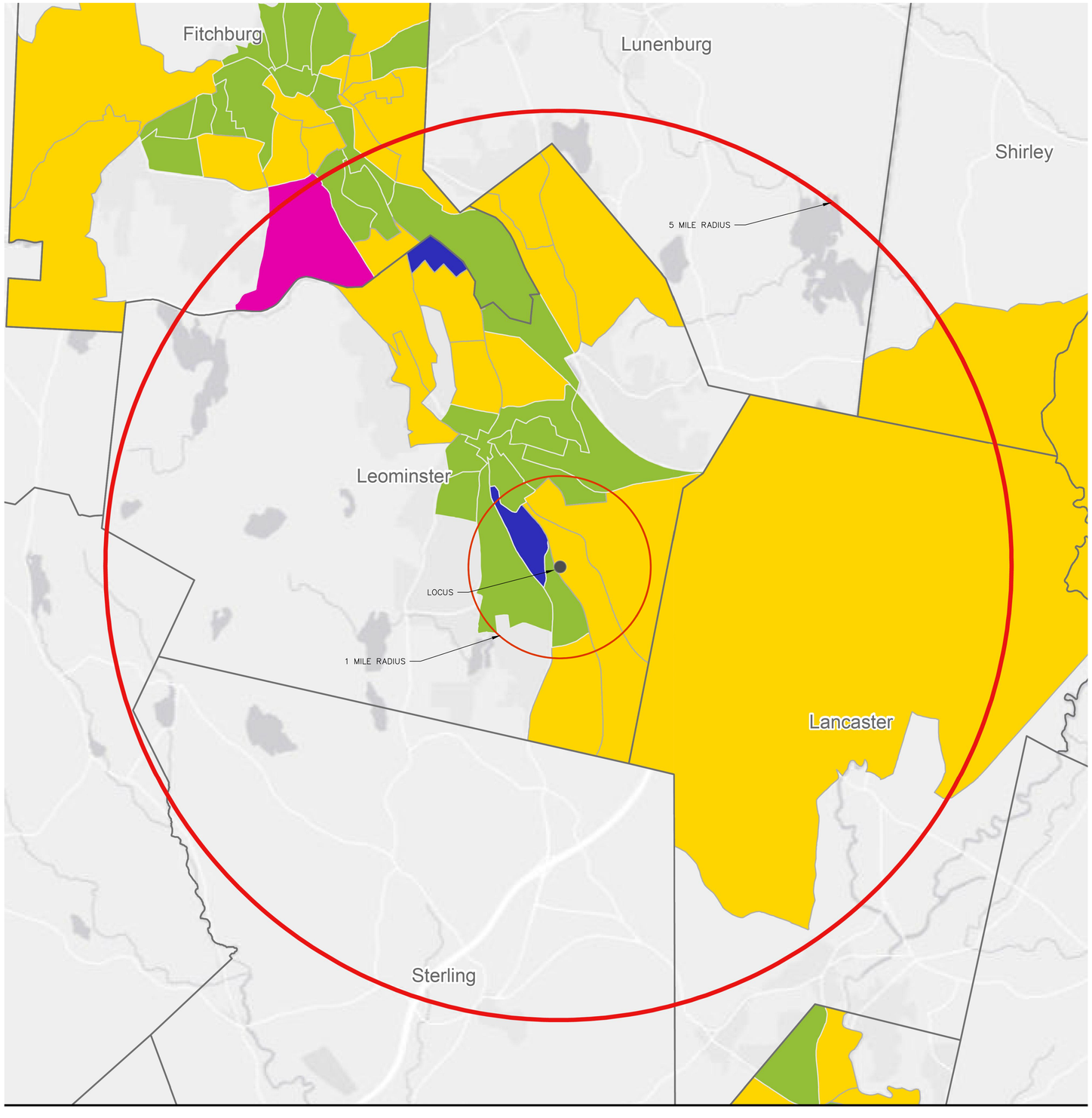
UMML provided Advance Notification prior to submitting the Environmental Notification Form to engage the public and provide awareness about the Project and the upcoming permitting process. This advance notification included sending EJ Screening Forms in English and Spanish (see Attachment 3) to the Project-Specific EJ Distribution List with information on the upcoming pre-application public informational meeting. This Distribution List is included as Attachment 2 and has been since amended following the initial July 22, 2024 public hearing. Additional Town entities and the State Representative were included in the Advance Notification.

The Public Meeting notice was published in the Sentinel in English and Vocero in Spanish prior to the meeting. It was also posted on the Leominster Public Library's bulletin board and sent to the City to be included on the City's meeting calendar.

Following the public informational meeting, additional Project information was provided and a site walk was held on August 16, 2024 for City Board of Health Officials and the State Representative's office.

ATTACHMENT 1

ENVIRONMENTAL JUSTICE POPULATIONS - FIGURE 8



Minority: the block group minority population is >= 40%, or the block group minority population is >= 25% and the median household income of the municipality the block group is in is < 150% of the Massachusetts median household income

Income: at least 25% of households have a median household income 65% or less than the state median household income

Language isolation: 25% or more of households do not include anyone older than 14 who speaks English very well

Minority and Income

Minority and English isolation

Income and English isolation

Minority, Income and English isolation

NOTES:
1. THESE DATA WERE OBTAINED FROM https://www.mass.gov/info-details/massgis-data-2020-environmental-justice-populations
2. PER GUIDELINES, PROJECT IS SUBJECT TO THE 1-MILE DESIGNATED GEOGRAPHIC AREA (DGA) FOR ENVIRONMENTAL JUSTICE RELATED PROTOCOLS.



LOCUS MAP
N.T.S.

Green Seal Environmental, LLC
114 State Road, Building B
Sagamore Beach, MA 02562
Tel: (508) 888-6034
Fax: (508) 888-1506
www.gseenv.com

These drawings are the property of the Design Engineer, Green Seal Environmental, LLC. Unauthorized reproduction for any purpose is an infringement upon copyright laws. Violators will be subject to prosecution.

Dimensions are as indicated.

Use of this plan constitutes acceptance of terms and conditions set forth in accompanying project documentation.

It is the responsibility of the user to confirm discrepancies with the Engineer prior to use.

REVISIONS

NO.	DATE	COMMENT

PURPOSE:

SITE SUITABILITY MODIFICATION

LOCUS:

200 TANZIO ROAD
LEOMINSTER, MA 01453

PREPARED FOR:

UNITED MATERIAL MANAGEMENT OF LEOMINSTER, LLC

DRAWING TITLE:

ENVIRONMENTAL JUSTICE POPULATIONS 2020

CAD TECH:	CHECKED BY:
D. HAZEN	L. BUGAY
ENGINEER:	DATE:
L. BUGAY	5/22/2024
	SCALE: 1"=3000'
	SHEET: FIGURE 8

ATTACHMENT 2

PROJECT- SPECIFIC EJ DISTRIBUTION LIST

Project-Specific EJ Reference List

Populate this Project-Specific Reference List with the appropriate contacts from all 4 tabs in the EJ Reference List workbook

Project Name: United Material Management of Leominster

Project Address: 200 Tanzio Road, Leominster MA 01453

MA Municipalities in Project's DGA: Leominster

Date Generated: 3/6/2026

Filing Type:

☐ ENF/EENF ☑ DEIR/FEIR ☐ SEIR ☐ Other

First Name	Last Name	Title	Phone	Email	Affiliation	Contact Type *(autopopulates)*
Claire	B.W. Muller	Movement Building Director	(508) 308-9261	claire@uumassaction.org	Unitarian Universalist Mass Action Network	Statewide CBO
Julia	Blatt	Executive Director	(617) 714-4272	juliablatt@massriversalliance.org	Mass Rivers Alliance	Statewide CBO
Jodi	Valenta	Massachusetts State Director	(617) 367-6200	Jodi.Valenta@tpl.org	The Trust for Public Land	Statewide CBO
Kerry	Bowie	Board President	Not Provided	kerry@msaadapartners.com	Browning the GreenSpace	Statewide CBO
Sylvia	Broude	Executive Director	(617) 292-4821	sylvia@communityactionworks.org	Community Action Works	Statewide CBOLocal CBO
Britteny	Jenkins	Vice President	Not Provided	Bjenkins@clf.org	Conservation Law Foundation	Statewide CBO
Alex	St. Pierre	Director of Communities & Toxics	Not Provided	aestpierre@clf.org	Conservation Law Foundation	Statewide CBO
Paulina	Muratore	Director of Transportation Justice and Infrastructure	Not Provided	pmuratore@clf.org	Conservation Law Foundation	Statewide CBO
Breanne	Frank	Associate Attorney	Not Provided	bfrank@clf.org	Conservation Law Foundation	Statewide CBO
Phil	Papiasvili	Staff Attorney	Not Provided	ppapiasvili@clf.org	Conservation Law Foundation	Statewide CBO
Priya	Gandbhir	Director of Clean Power	Not Provided	pgandbhir@clf.org	Conservation Law Foundation	Statewide CBO
Julia	Carlton MacKay	Director of Community Resilience	Not Provided	jcarltonmackay@clf.org	Conservation Law Foundation	Statewide CBO
Amy	Boyd Rabin	Vice President of Policy	(617) 221-8258	aboydrabin@environmentalleague.org	Environmental League of Massachusetts	Statewide CBO
Ben	Hellerstein	MA State Director	(617) 747-4368	ben@environmentmassachusetts.org	Environment Massachusetts	Statewide CBO
Robb	Johnson	Executive Director	(978) 443-2233	robb@massland.org	Mass Land Trust Coalition	Statewide CBO
Cindy	Luppi	New England Director	(617) 338-8131 x208	cluppi@cleanwater.org	Clean Water Action	Statewide CBO
Dálida	Rocha	Executive Director	Not Provided	dalida@n2nma.org	Neighbor to Neighbor Mass.	Statewide CBOLocal CBO
Lena	Entin	Director of Individual Giving	Not Provided	lena@n2nma.org	Neighbor to Neighbor Mass.	Statewide CBOLocal CBO
Danny	Timpona	Organizing Director	Not Provided	danny@n2nma.org	Neighbor to Neighbor Mass.	Statewide CBOLocal CBO
Miles	Gresham	Campaign Director	Not Provided	miles@n2nma.org	Neighbor to Neighbor Mass.	Statewide CBOLocal CBO
Rob	Moir	Executive Director	Not Provided	rob@oceanriver.org	Ocean River Institute	Statewide CBO
Vickash	Mohanka	Director, MA Chapter	Not Provided	vick.mohanka@sierraclub.org	Sierra Club MA	Statewide CBO
Heidi	Ricci	Director of Policy	Not Provided	hricci@massaudubon.org	Mass Audubon	Statewide CBO
Alma	Gordon	President	Not Provided	tribalcouncil@chappaquiddickwampanoa	Chappaquiddick Tribe of the Wampanoag Nation	Indigenous Org
Cheryll	Toney Holley	Chair	(774) 317-9138	cholley@nipmuc.gov	Nipmuc Nation (Hassanamisco Nipmucs)	Indigenous Org
John	Peters, Jr.	Executive Director	(617) 573-1292	john.peters@mass.gov	Massachusetts Commission on Indian Affairs (MCIA)	Indigenous Org
Melissa	Ferretti	Chair	(508) 304-5023	melissa@herringpondtribe.org	Herring Pond Wampanoag Tribe	Indigenous Org
Patricia	D. Rocker	Council Chair	Not Provided	rockerpatriciad@verizon.net	Chappaquiddick Tribe of the Wampanoag Nation, Whale Clan	Indigenous Org
Raquel	Halsey	Executive Director	(617) 232-0343	rhalsey@naicob.org	North American Indian Center of Boston	Indigenous Org
Cora	Pierce	Not Provided	Not Provided	Coradot@yahoo.com	Pocassett Wampanoag Tribe	Indigenous Org
Elizabeth	Solomon	Not Provided	Not Provided	Solomon.Elizabeth@gmail.com	Massachusetts Tribe at Ponkapoag	Indigenous Org
Bettina	Washington	Tribal Historic Preservation Officer	(508) 560-9014	thpo@wampanoagtribe-nsn.gov	Wampanoag Tribe of Gay Head (Aquinnah)	Federal Tribe
Brian	Weeden	Chair	(774) 413-0520	Brian.Weeden@mwtribe-nsn.gov	Mashpee Wampanoag Tribe	Federal Tribe
Nakia	Hendricks Jr.	Office Manager	Not Provided	106Review@mwtribe-nsn.gov	Mashpee Wampanoag Tribe	Federal Tribe
David	Weeden	THPO/Director	(774) 327.0068	David.Weeden@mwtribe-nsn.gov	Mashpee Wampanoag Tribe	Federal Tribe
Neddy	Latimer	Not Provided	(978) 534-3145	info@spanishamericancenter.org	Spanish American Center	Local Organization

Project-Specific EJ Reference List

List Addendum- Project Commentors and Public Meeting Attendees

Project Name: United Material Management of Leominster
Project Address: 200 Tanzio Road, Leominster MA 01453
MA Municipalities in Project's DGA: Leominster
Date Updated: 6/27/2025
Filing Type:
| ☐ ENF/EENF | ☑ DEIR/FEIR | ☐ SEIR | ☐ Other

First Name	Last Name	Title	Email	Type
Vicki	Briggs	Chair, Leominster Cultural Council	LCC01453@gmail.com	Supplemental Research
Dean	Mazzarella	Mayor	dmazzarella@leominster-ma.gov	Supplemental Research
Raymond	Racine	DPW Director	rracine@leominster-ma.gov	Supplemental Research
Natalie	Higgins	State Rep	natalie.higgins@mahouse.gov	Public Meeting Attendee
Nicole	Butler	Assistant Director, Leominster Public Library	nbutler@leominster-ma.gov	Supplemental Research
Michelle	Powell	BOH	mpowell@leominster-ma.gov	Supplemental Research
Elizabeth	Wood	Planning Board	ewood@leomisnter-ma.gov	Supplemental Research
W	Brady	Resident	bradybill862@gmail.com	Public Meeting Attendee
David	Cormier	City Council	dcormier@leominster-ma.gov	Public Meeting Attendee
Laura	Proietti	Resident	laurafproietti@aol.com	Public Meeting Attendee
Nicole	Pare	BOH	nicolepare1968@gmail.com	Public Meeting Attendee
Wendy	Wiiks	BOH	wwiiks@leominster-ma.gov	Public Meeting Attendee
Michelle	Powell	Resident	mbpowell1975@gmail.com	ENF Commentor
Deb	Buckley	Resident	deb.buckley@gmail.com	ENF Commentor
Paul	Brayton	Resident	p.brayton@comcast.net	ENF Commentor
Frank	Bangrazi	Resident	frankie111290@gmail.com	ENF Commentor
David	Dill	Resident	davedill2016@gmail.com	ENF Commentor
Lisa	Christy	Resident	christylisa@hotmail.com	ENF Commentor
Steven	Allain	Resident	sallain113@gmail.com	ENF Commentor
Terri	Stymiest	Resident	tonystymiest@yahoo.com	ENF Commentor
Yancarlos	Alvarez	Business Owner	jctransportcorp@gmail.com	ENF Commentor
Vincenzo	Seretto	Resident	vseretto@win-waste.com	ENF Commentor
Maureen	Clapp	Resident	maureenclapp11@gmail.com	Public Meeting Attendee
Edward	Clapp	Resident	moedclapp@comcast.net	Public Meeting Attendee
Luke	Beaulac	City of Leominster	lbeaulac@leominster-ma.gov	Public Meeting Attendee
Pauline	Cormier	City Council	pcormier@leominster-ma.gov	Public Meeting Attendee
Nicole	Pare	Leominster BOH	nicolepare1968@gmail.com	Public Meeting Attendee
Claire	Freda	City Council	cfreda@leominster-ma.gov	Public Meeting Attendee
Haily	Brady	Resident	haileybrady16@gmail.com	DEIR Commentor
James	McQuade	MassDEP	james.mcquade@mass.gov	Permittor
Mary	Cushner	MassDEP	mary.cushner@mass.gov	Permittor
JoAnne	Kasper-Dunne	MassDEP	joanne.kasper-dunne@mass.gov	DEIR Commentor/Permittor

ATTACHMENT 3

EJ SCREENING FORMS
(ENGLISH AND SPANISH)

Environmental Justice Screening Form

Project Name	Permit Modification at United Material Management of Leominster, LLC
Anticipated Date of MEPA Filing	September 3, 2024
Proponent Name	United Material Management of Leominster, LLC
Contact Information (e.g., consultant)	**Environmental Consultant:** Laura Bugay, PE Green Seal Environmental, LLC l.bugay@gseenv.com 508-888-6034 **Community Involvement Contact:** UMM of Leominster Mary Urban, Senior Director of Communications and Community Relations comms@win-waste.com (866) 946-9278
Public website for project or other physical location where project materials can be obtained (if available)	www.ummleominster.com
Municipality and Zip Code for Project (if known)	Municipality: Leominster, MA Zip Code: 01453
Project Type* (list all that apply)	Solid Waste, Industrial
Is the project site within a mapped 100-year FEMA flood plain? Y/N/ unknown	No
Estimated GHG emissions of conditioned spaces (click here for GHG Estimation tool)	N/A, as there will be no modification to existing facility/conditioned spaces. The existing facility was constructed in 2019-2020 with three conditioned spaces including the employee facility trailer, offices, and scale house. According to the GHG estimation tool, these spaces currently generate 13 tons per year of CO_2 emissions (less than 2 single-family houses). No changes are proposed.

Project Description

1. Provide a brief project description, including overall size of the project site and square footage of proposed buildings and structures if known.

United Material Management of Leominster (UMML) is a state-of-the-art municipal solid waste (MSW) and construction & demolition (C&D) waste handling and transfer station with an integrated rail line. The facility, located at 200 Tanzio Road in Leominster, Massachusetts, specializes in the recycling of C&D debris and the transfer of residuals for responsible end disposal.

In order to meet the growing demand for waste handling in Massachusetts, UMML is proposing a project, subject to Massachusetts Environmental Policy Act (MEPA) review, that will increase the handling capacity at its current facility in Leominster. The facility will not require any building expansion to accommodate the increased handling capacity. The facility is currently permitted to process up to 1,000 tons of waste per day (TPD). This project would increase that capacity to 1,500 TPD.

The UMML facility is located on a 13.46-acre parcel of land within an Industrial Park and includes an access driveway, parking areas, and an existing 32,500-square-foot building with a metal frame and sheathing. Even with this proposed capacity increase, all waste handling functions will continue to be performed entirely within the existing material processing building and its confines, including tipping and inspection, temporary waste storage, and outbound rail and truck loading. C&D processing activities will continue to utilize sorting equipment for the removal and recovery of recyclables. The facility will continue to predominantly ship material for end disposal via rail, the least carbon-intensive mode for land transport.

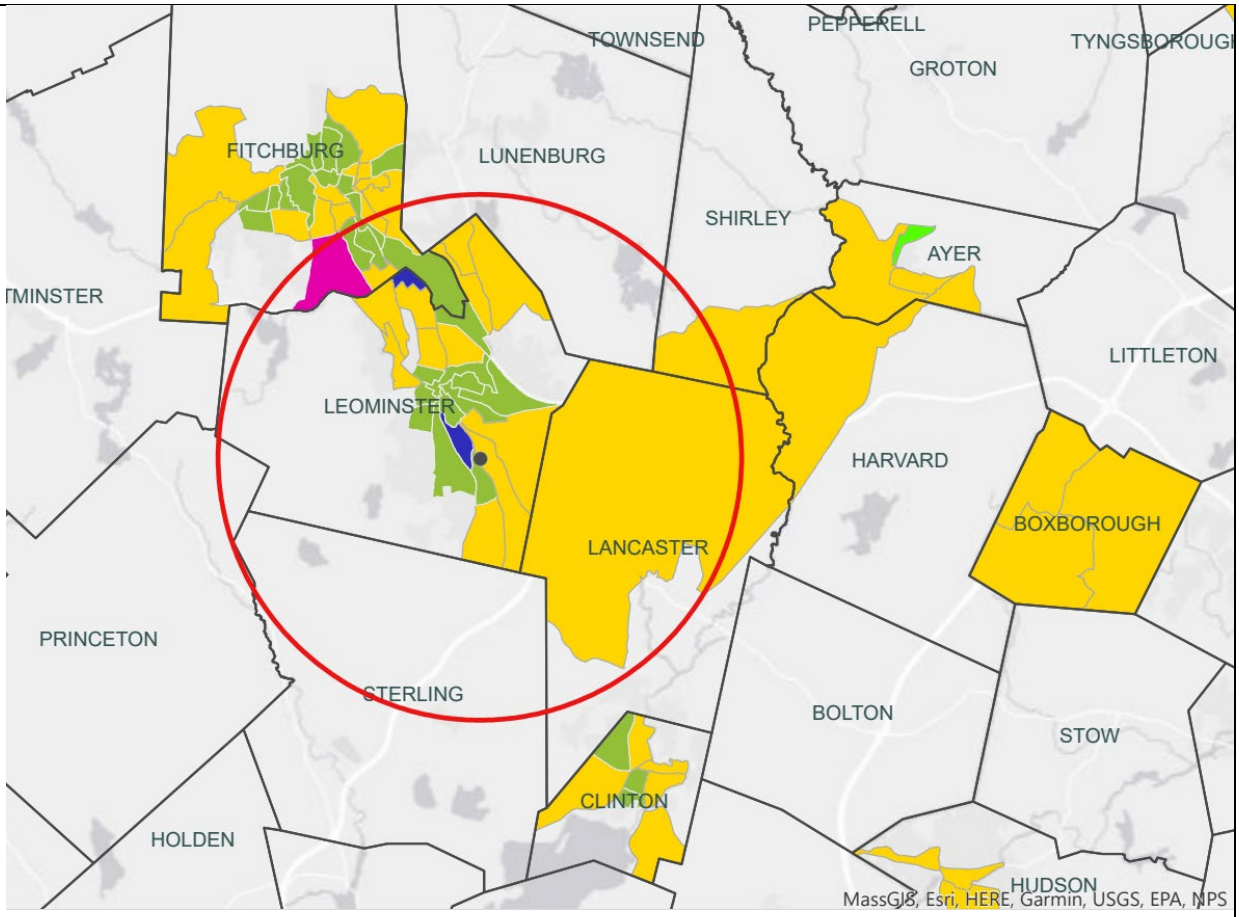
2. List anticipated MEPA review thresholds (301 CMR 11.03) (if known)

(9) Solid Waste

3. List all anticipated state, local and federal permits needed for the project (if known)

Local: Leominster Board of Health – Major Modification to an Existing Site Assignment
State: MassDEP Site Suitability (BWP SW 38); MassDEP Permit Modification (BWP SW 07)

4. Identify EJ populations and characteristics (Minority, Income, English Isolation) within 5 miles of project site (can attach map identifying 5-mile radius from EJ Maps Viewer in lieu of narrative)



UMML site

5-mile radius

Minority

Minority and income

Minority, income, and English isolation

Minority and English isolation

5. Identify any municipality or census tract meeting the definition of "vulnerable health EJ criteria" in the DPH EJ Tool located in whole or in part within a 1 mile radius of the project site

The DPH EJ Tool shows that the City of Leominster contains one Vulnerable Health EJ neighborhood, for heart attack criteria. The Lancaster municipal boundary is within 1 mile of the project although Lancaster does not have any Vulnerable Health EJ criteria.

6. Identify potential short-term and long-term environmental and public health impacts that may affect EJ Populations and any anticipated mitigation

There will be no physical building expansion to the existing facility for this project. The potential environmental and public health impacts to the local EJ Population are expected to be limited to that associated with traffic, however, will not necessarily lead to more vehicles in the surrounding EJ areas. There will be more vehicle activity with the increased capacity but mainly at the facility.

The facility provides a local outlet for locally generated waste so that vehicles already travelling on local roads won't have to travel as far to dispose/recycle waste materials, which saves fuel and reduces emissions. The increased vehicle activity and the associated emissions will be mitigated through compliance with MassDEP's Anti-Idling law, Tier IV-compliant vehicle usage, and facility design that includes two truck scales to minimize time trucks are on site and air handling systems for equipment operating inside. EPA's March 2024, Greenhouse Gas Emissions Standards for Heavy Duty Vehicles – Phase 3 Rule will further regulate GHG emissions from refuse and tractor trailer heavy duty trucks starting in 2027 that will further reduce GHG emissions associated with this project.

The facility's advanced Best Management Practices for air quality include:

1. Enclosing all tipping, handling, and loading operations within the handling building.
2. Utilizing a misting system in the handling building to control dust and odor.
3. Conducting daily cleanups and sweeping.
4. Using covered transportation for trucks and railcars.
5. Applying first in/first out procedures to reduce the time municipal solid waste (MSW) remains on site, minimizing the potential for nuisance conditions.
6. Using two vehicle scales to increase efficiency and minimize time trucks are on site.

UMML will continue to utilize advanced sorting equipment for the recovery of recyclables and use low-carbon rail for transport. These efficiencies preserve precious natural resources and reduce CO_2 emissions as moving waste by rail is four times more fuel efficient than using tractor trailers.

7. Identify project benefits, including "Environmental Benefits" as defined in 301 CMR 11.02, that may improve environmental conditions or public health of the EJ population

Key project benefits include:

Meeting the demand for waste management – The need for economical and environmentally-sensitive handling of both MSW and C&D waste in the City of Leominster is a critically-important, growing challenge. If its service capability is expanded under this project, the UMML facility will be able to better address that challenge for the city, its residents, and its businesses. Additionally, the facility will also be an important asset for the region's ability to provide an economically competitive and efficient means to manage C&D and MSW due to its unique use of rail for transport. This rail-served facility will allow the region to access disposal outlets that are generally not economically viable through traditional trucking alone.

It should also be noted that based on the inevitable closure of the Fitchburg/Westminster landfill and others, more disruptions in waste management across the region as well as the entire Commonwealth can be expected. This will place additional pressures on a statewide system that is already struggling to keep pace with demand. The UMML facility is perfectly positioned and able to alleviate some of that pressure with no new construction required.

Providing a driver for economic development – According to the Leominster Economic Development Office, industrial development in Leominster is a priority. This region continues to boast of a highly skilled workforce, particularly within manufacturing industries.

The existing UMML facility was approved for construction in 2019 and the current service expansion proposal will offer a unique opportunity to further both economic and environmental

goals without additional construction impact to the surrounding environment. It will create more employment opportunities for residents and grow the tax base.

Additionally, it is very likely that with the anticipated shortage of adequate disposal and landfill capacity in the future, exportation of waste will become more significant in Massachusetts. It is this fact that differentiates the UMML site from other waste handling facilities in that it has access to railway transport and can export waste with considerably less environmental impact that trucking transfer.

Increasing recycling – UMML specializes in the sorting and recycling of C&D materials and is a MassDEP-compliant C&D processor. An increase in permitted daily capacity would increase the quantity of materials the facility is recycling. The facility recovers hundreds of tons of recyclables each month. Asphalt, brick, concrete, cardboard, ferrous and non-ferrous metals, asphalt shingles, gypsum, tires, and wood are all sent to recycling facilities for reuse in new products — helping conserve our natural resources for future generations. What we cannot recycle is transferred to its final disposal by rail, the lowest carbon mode of land transport.

Reducing GHGs in the waste management handling process – The UMML facility is committed to sustainable business practices by taking the most efficient transport routes, recycling materials for reuse, and investing in sustainable technologies.

UMML's state-of-the-art waste handling process uses numerous GHG-reduction tactics to protect our planet, but the most impactful at this site includes consolidating waste prior to transport, using rail transport instead of traditional truck transport whenever possible, and diverting as much waste from near-capacity landfills via recycling, reuse, and recovery.

Rail transport is four times more efficient than trucking in terms of fuel use and emissions since trains can move a ton of freight more than 470 miles on a single gallon of fuel compared to trucks that can move the same for only 134 miles (approximately). Thanks to this fuel-efficient transport option at UMML, negative environmental impacts from traditional trucking such as the emission of diesel particulate, carbon dioxide, nitrogen oxides, and other greenhouse gases, are greatly reduced.

Protects open space – The existing UMML facility does not impact open space as it has adequate separation to any designated open space, is outside of mapped habitats, and is located in an existing industrial park that is zoned for this type of facility. By utilizing the existing facility, no new facility must be constructed. Therefore, no demand for additional land space is required to increase waste handling capacity.

8. Describe how the community can request a meeting to discuss the project, and how the community can request oral language interpretation services at the meeting. Specify how to request other accommodations, including meetings after business hours and at locations near public transportation.

A public meeting has been scheduled for Monday, July 22, 2024, at 6 p.m., in the Community Room at Leominster Public Library located at 30 West St, Leominster, MA 01453, which is within walking distance to bus stops along the MART Fitchburg/Leominster Bus Route System. More information about the meeting is included in the attached public meeting notice. To request language interpretation services at the meeting please email comms@win-waste.com. Please allow a two-weeks' notice prior to the meeting to request interpretation services.

Formulario de evaluación de justicia ambiental

Nombre del proyecto	Modificación del permiso en United Material Management of Leominster, LLC
Fecha prevista de presentación ante MEPA	3 de septiembre, 2024
Nombre del proponente	United Material Management of Leominster, LLC
Información de contacto (p. ej., consultor)	**Consultor ambiental:** Laura Bugay, PE Green Seal Environmental, LLC l.bugay@gseenv.com 508-888-6034 **Contacto de participación comunitaria:** UMM of Leominster Mary Urban, Director sénior de Comunicaciones y Relaciones Comunitarias comms@win-waste.com (866) 946-9278
Sitio web público para el proyecto u otra ubicación física donde se pueden obtener materiales del proyecto (si está disponible)	www.ummleominster.com
Municipio y código postal del proyecto (si se conoce)	Municipio: Leominster, MA Código postal: 01453
Tipo de proyecto* (indique todos los que correspondan)	Desechos sólidos, industriales
¿Se encuentra el sitio del proyecto dentro de un terreno inundable dentro de 100 años mapeado por la FEMA? S/N/Se desconoce	No
Emisiones estimadas de GEI de los espacios acondicionados (haga clic aquí para acceder a la herramienta de estimación de GEI)	N/A, ya que no habrá modificaciones en las instalaciones ni en los espacios acondicionados existentes. La instalación existente se construyó en 2019-2020 con tres espacios acondicionados, incluido el remolque con instalaciones para empleados, las oficinas y la estación de pesaje. Según la herramienta de estimación de GEI, estos espacios actualmente generan 13 toneladas por año de emisiones de CO_2 (menos que 2 casas unifamiliares). No se proponen cambios.

Descripción del proyecto

1. Proporcione una breve descripción del proyecto, incluido el tamaño total del sitio del proyecto y los pies cuadrados de los edificios y estructuras propuestos, si se conocen.

United Material Management of Leominster (UMML) es una estación de última generación de transferencia y manejo de desechos sólidos municipales (municipal solid waste, MSW), y desechos de construcción y demolición (construction & demolition, C&D) que cuenta con una línea ferroviaria integrada. La instalación, ubicada en 200 Tanzio Road en Leominster, Massachusetts, se especializa en el reciclaje de desechos de C&D y la transferencia de residuos para la eliminación final responsable.

A fin de satisfacer la creciente demanda de manejo de desechos en Massachusetts, UMML propone un proyecto, sujeto a la revisión de la Massachusetts Environmental Policy Act (MEPA), que aumentará la capacidad de manejo en sus instalaciones actuales en Leominster. La instalación no requerirá ninguna expansión del edificio para adaptarse al aumento de la capacidad de manipulación. Actualmente, la instalación tiene permiso para procesar hasta 1,000 toneladas de desechos por día (TPD). Este proyecto aumentaría esa capacidad a 1,500 TPD.

La instalación de UMML está ubicada en una parcela de terreno de 13.46 acres dentro de un parque industrial e incluye una entrada de acceso, áreas de estacionamiento y un edificio existente de 32,500 pies cuadrados con un marco de metal y revestimiento. Incluso con este aumento de capacidad propuesto, todas las funciones de manejo de desechos se seguirán realizando completamente dentro del edificio de procesamiento de materiales existente y sus límites, incluidos el volcado y la inspección, el almacenamiento temporal de desechos y la carga saliente en trenes y camiones. Para las actividades de procesamiento de C&D, se seguirán utilizando equipos de clasificación para eliminar y recuperar los materiales reciclables. La instalación continuará enviando material para su eliminación final predominantemente por ferrocarril, el modo de menor generación de carbono para el transporte terrestre.

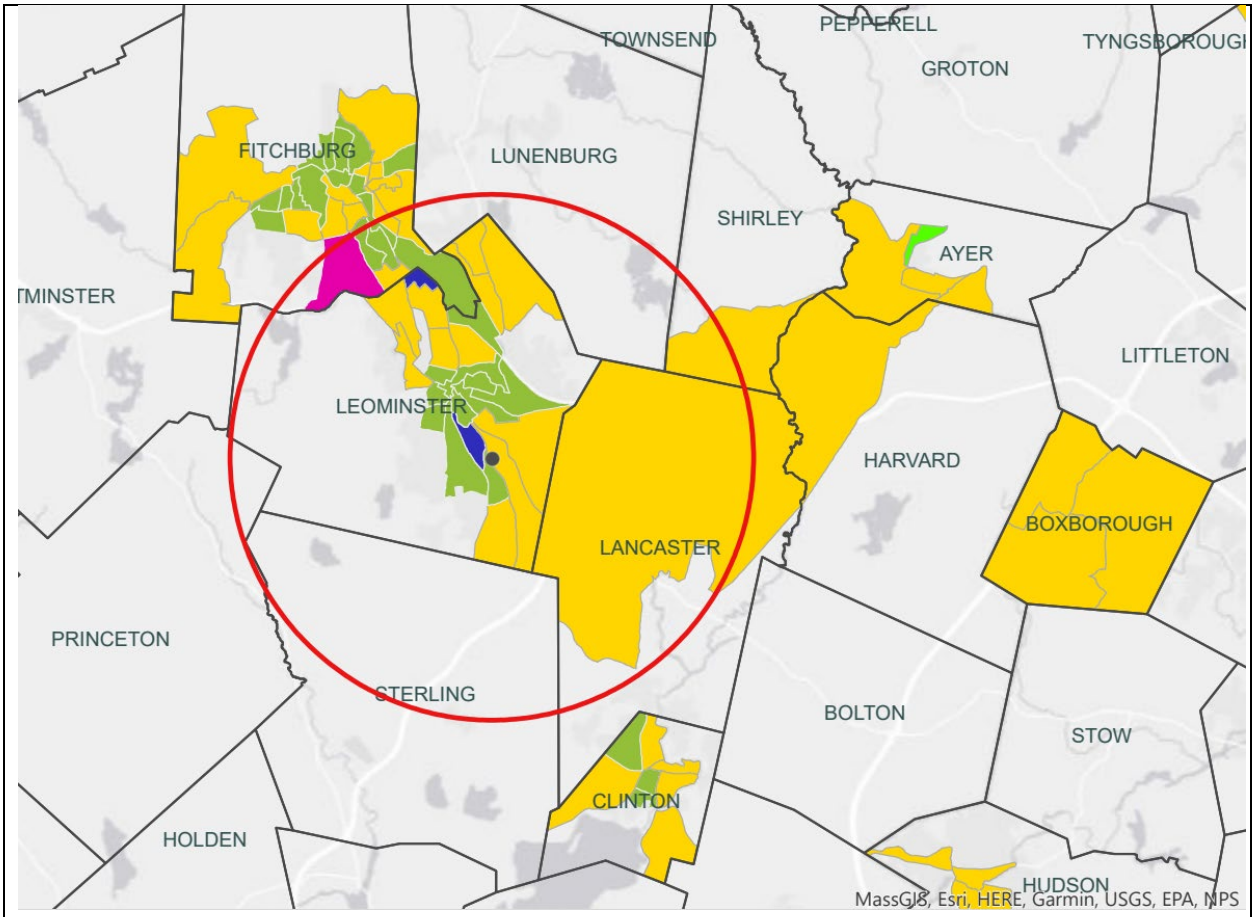
2. Indique los niveles de revisión anticipada de MEPA (301 CMR 11.03) (si se conocen).

(9) Desechos sólidos

3. Enumere todos los permisos estatales, locales y federales previstos necesarios para el proyecto (si se conocen).

Local: Junta de Salud de Leominster: principal modificación a una asignación de sitio existente
Estado: idoneidad del sitio de MassDEP (BWP SW 38); modificación del permiso de MassDEP (BWP SW 07)

4. Identifique las poblaciones y características de justicia ambiental (EJ) (minoría, ingresos, aislamiento inglés) dentro de las 5 millas del sitio del proyecto (puede adjuntar un mapa que identifique un radio de 5 millas desde la opción Visor de mapas de EJ en lugar de texto)



- Sitio de UMML
- Radio de 5 millas
- Minoría
- Minoría e ingresos
- Aislamiento de minorías, ingresos e inglés
- Aislamiento de minorías e inglés

5. Identifique cualquier municipio o sección censal que cumpla con la definición de "criterios de población de EJ con salud vulnerable" en la Herramienta de EJ del Departamento de Salud Pública (DPH) ubicado en su totalidad o en parte dentro de un radio de 1 milla del sitio del proyecto.

La herramienta DPH EJ muestra que la ciudad de Leominster contiene un vecindario de EJ de salud vulnerable, para los criterios de ataque cardíaco. El límite municipal de Lancaster está a menos de 1 milla del proyecto, aunque Lancaster no tiene ningún criterio de EJ de salud vulnerable.

6. Identifique los potenciales impactos a corto y largo plazo sobre el ambiente y la salud pública que pueden afectar a las poblaciones de EJ y cualquier mitigación prevista.

No habrá expansión física de construcción de las instalaciones existentes para este proyecto. Se espera que los posibles impactos ambientales y de salud pública para la población de EJ se limiten a los asociados con el tráfico; sin embargo, no necesariamente generarán más vehículos en las áreas de EJ circundantes. Habrá más actividad vehicular con el aumento de la capacidad, pero principalmente en las instalaciones.

La instalación ofrece una salida local para los desechos generados localmente, de modo que los vehículos que ya circulan por carreteras locales no tienen que circular tanto para desechar/reciclar los materiales de desecho, lo que ahorra combustible y reduce las emisiones. El aumento de la actividad vehicular y las emisiones asociadas se mitigarán mediante el cumplimiento de la ley contra la inactividad de MassDEP, el uso de vehículos conforme al Nivel IV y el diseño de instalaciones que incluye dos básculas de pesaje de camiones para minimizar el tiempo que los camiones están en el sitio y sistemas de manejo de aire para los equipos que operan en el interior. Normas de emisiones de gases de efecto invernadero para vehículos de servicio pesado de la EPA de marzo de 2024: la regla de fase 3 regulará aún más las emisiones de GEI de los camiones de servicio pesado de desechos y remolques de tractores a partir de 2027, lo que reducirá aún más las emisiones de GEI asociadas con este proyecto.

Las Mejores prácticas de gestión avanzadas para la calidad del aire incluyen:

- Realizar todas las operaciones de volcado, manipulación y carga dentro del edificio de manipulación.
- Utilizar un sistema de rociado en el edificio de manipulación para controlar el polvo y el olor.
- Realizar limpiezas y barridos diarios.
- Usar transporte cubierto para camiones y vagones.
- Aplicar el procedimiento de primero en entrar/primero en salir para reducir el tiempo que los desechos sólidos municipales están en el sitio, lo que minimiza el potencial de condiciones molestas.
- Usar dos básculas para vehículos para aumentar la eficiencia y minimizar el tiempo que los camiones permanecen en el sitio.

UMML continuará utilizando equipos de clasificación avanzados para la recuperación de materiales reciclables y utilizará para el transporte el ferrocarril, que genera un bajo nivel de carbono. Estas eficiencias preservan los valiosos recursos naturales y reducen las emisiones de CO_2, ya que el consumo de combustible para transportar los desechos por ferrocarril es cuatro veces más eficiente que hacerlo con remolques de tractores.

7. Identifique los beneficios del proyecto, incluidos los "beneficios ambientales", tal como se definen en 301 CMR 11.02, que pueden mejorar las condiciones ambientales o la salud pública de la población de EJ.

Los beneficios clave del proyecto incluyen:

Satisfacer la demanda de gestión de desechos: la necesidad de un manejo económico y respetuoso con el medioambiente de los desechos de MSW y C&D en la ciudad de Leominster es un desafío creciente con una importancia crítica. Si su capacidad de servicio se amplía en virtud de este proyecto, la instalación de UMML podrá abordar mejor ese desafío para la ciudad, sus residentes y sus negocios. Además, la instalación también será un activo importante, ya que

la región podrá proporcionar un medio económicamente competitivo y eficiente para gestionar C&D y MSW gracias a su uso único del ferrocarril para el transporte. Esta instalación ferroviaria permitirá que la región acceda a salidas de desecho que generalmente no son económicamente viables a través de camiones tradicionales.

También se debe tener en cuenta que, en función del cierre inevitable del vertedero de Fitchburg/Westminster y otros, es posible que se interrumpa más la gestión de desechos en toda la región, así como en toda la Mancomunidad. Esto supondrá presiones adicionales al sistema estatal que ya tiene dificultades para mantenerse al día con la demanda. La instalación de UMML está perfectamente situada y puede aliviar parte de esa presión sin la necesidad de nuevas construcciones.

Proporcionar un impulsor para el desarrollo económico: según la Oficina de Desarrollo Económico de Leominster, el desarrollo industrial en Leominster es prioridad. Esta región sigue contando con una fuerza laboral altamente calificada, particularmente en las industrias manufactureras.

La construcción de la instalación existente de UMML se aprobó en 2019 y la propuesta actual de expansión del servicio ofrecerá una oportunidad única para promover objetivos económicos y ambientales sin impacto adicional de construcción en el entorno circundante. Creará más oportunidades de empleo para los residentes y aumentará la base impositiva.

Además, es muy probable que, debido a la escasez prevista de la capacidad adecuada de desecho y vertedero en el futuro, la exportación de desechos se vuelva más significativa en Massachusetts. Este hecho es lo que diferencia al sitio de UMML de otras instalaciones de manejo de desechos, ya que tiene acceso a transporte ferroviario y puede exportar desechos con un impacto ambiental considerablemente menor que el traslado en camiones.

Aumentar el reciclaje: UMML se especializa en la clasificación y el reciclaje de materiales de C&D, y procesa C&D en cumplimiento con el MassDEP. Un aumento en la capacidad diaria permitida incrementaría la cantidad de materiales que la instalación recicla. La instalación recupera cientos de toneladas de materiales reciclables cada mes. Asfalto, ladrillo, concreto, cartón, metales ferrosos y no ferrosos, tejas de asfalto, yeso, neumáticos y madera se envían a instalaciones de reciclaje para su reutilización en nuevos productos, lo que ayuda a conservar nuestros recursos naturales para las generaciones futuras. Lo que no podemos reciclar se transfiere para su eliminación final por ferrocarril, el modo de transporte terrestre con menos generación de carbono.

Reducir los GEI en el proceso de manejo de desechos: la instalación de UMML asume el compromiso de cumplir prácticas comerciales sostenibles al elegir las rutas de transporte más eficientes, reciclar materiales para su reutilización e invertir en tecnologías sostenibles.

El proceso de manejo de desechos de última generación de UMML utiliza numerosas tácticas de reducción de GEI para proteger nuestro planeta, pero la más impactante en este sitio incluye compactar los desechos antes del transporte, usar el transporte ferroviario en lugar del transporte tradicional de camiones siempre que sea posible y desviar la mayor cantidad de desechos de los vertederos casi colapsados a través del reciclaje, la reutilización y la recuperación.

El transporte ferroviario es cuatro veces más eficiente que el transporte en camiones en términos de uso de combustible y emisiones, ya que los trenes pueden transportar una tonelada de carga más de 470 millas con un solo galón de combustible en comparación con los camiones que pueden transportar la misma carga solo 134 millas (aproximadamente). Gracias a esta opción de transporte de bajo consumo de combustible en UMML, los impactos ambientales negativos de los camiones tradicionales, como la emisión de partículas diésel, dióxido de carbono, óxidos de nitrógeno y otros gases de efecto invernadero, se reducen en gran medida.

Proteger el espacio abierto: la instalación existente de UMML no afecta el espacio abierto, ya que se encuentra lo suficientemente apartada de cualquier espacio abierto designado, está fuera de los hábitats asignados y se ubica en un parque industrial existente que está zonificado para este tipo de instalación. Al utilizar las instalaciones existentes, no es necesario construir instalaciones nuevas. Por lo tanto, no se requiere demanda de espacio terrestre adicional para aumentar la capacidad de manejo de desechos.

8. Describa cómo la comunidad puede solicitar una reunión para analizar el proyecto y cómo la comunidad puede solicitar servicios de interpretación de lenguaje oral en la reunión. Especifique cómo solicitar otras adaptaciones, incluidas reuniones fuera del horario laboral y en lugares cercanos al transporte público.

Se programó una reunión pública para el lunes 22 de julio de 2024, a las 6 p. m., en la sala comunitaria de la Biblioteca pública de Leominster ubicada en 30 West St, Leominster, MA 01453, que está cerca de las paradas de autobús del sistema de rutas de autobús MART Fitchburg/Leominster. Se incluye más información sobre la reunión en el aviso adjunto de la reunión pública. Para solicitar servicios de interpretación de idiomas en la reunión, envíe un correo electrónico a comms@win-waste.com. Envíe un aviso con dos semanas de anticipación antes de la reunión para solicitar los servicios de interpretación.

ATTACHMENT 4

PROJECT FACT SHEET
ENGLISH AND SPANISH

UNITED MATERIAL MANAGEMENT OF LEOMINSTER

A TRANSFER STATION IN LEOMINSTER, MASSACHUSETTS



United Material Management of Leominster (UMML), located at 200 Tanzio Road in Leominster, is a state-of-the-art waste transfer station with an integrated rail line. The facility specializes in the recycling of construction & demolition (C&D) waste and the transfer of municipal solid waste (MSW) and residuals for responsible end disposal. The site recovers hundreds of tons of recyclables each month, which are sent to recycling facilities for reuse in new products – helping conserve our natural resources for future generations. What we cannot recycle is transferred to its final disposal by rail, the lowest carbon mode of land transport.

Permit modification increases region's critical disposal capacity

In order to meet the growing demand for waste handling in Massachusetts, UMML is proposing a project, subject to Massachusetts Environmental Policy Act (MEPA) review, that will increase the handling capacity at the existing Leominster facility. The facility is currently permitted to process up to 1,000 tons of waste per day (TPD). This project would increase that capacity to 1,500 TPD without requiring any building expansion to accommodate the increase in daily handling.

Essential to the region's waste management infrastructure

Meets regional demand: With recent and inevitable closures of large landfills in the Commonwealth, there is a disposal capacity shortage in the region putting pressure on statewide systems that are already struggling to meet demand. By increasing the capacity and efficiency of an existing transfer station, UMML can help meet the demands of the growing population and changing waste patterns in the region.

Integrated rail provides access to disposal outlets: The facility exists in an area that has direct access to rail. UMML's rail connectivity provides the unique ability to move waste where there's space, alleviating the state's declining capacity and supports MassDEP's Solid Waste Master Plan. The region is better served by utilizing disposal outlets that are not generally accessible or viable through traditional long-haul trucking.







UNITED MATERIAL MANAGEMENT OF LEOMINSTER
A TRANSFER STATION IN LEOMINSTER, MASSACHUSETTS

Delivers a more sustainable waste management solution

Enhanced recycling: UMML specializes in the sorting and recycling of C&D materials and is a MassDEP-compliant C&D processor. The site recovers hundreds of tons of recyclables each month for reuse in new products, and an increase in permitted daily capacity would further expand recycling quantities at the site. Recyclable materials include asphalt, brick, concrete, cardboard, metals, and wood.

Reduces greenhouse gas emissions: UMML employs several strategies to reduce GHG emissions. The most impactful tactics involve consolidating waste before transport, utilizing rail transport over traditional trucking whenever feasible, and diverting waste from near-capacity landfills. Moving waste by rail is four times more fuel efficient than trucks on a highway and has the lowest carbon footprint per ton of waste transported, reducing GHG emissions by up to 75 percent.

Existing facility located in industrial park: The existing facility has adequate separation to any designated open space, is outside of mapped habitats and residential areas, and is within an industrial zoned area. By utilizing the existing facility, we can increase regional waste disposal capacity without the need for new construction or additional land space.

Supports the local economy: UMML significantly contributes to the local economic landscape and generates revenue for the City of Leominster in the form of taxes and royalties. Increasing regional disposal capacity at UMML creates jobs, encourages local investment, and further expands the tax base and revenue for the city, while also reducing disposal costs for local waste haulers. According to the Leominster Economic Development Office, industrial development in Leominster is a priority as the region boasts a highly-skilled workforce within manufacturing industries.

State-of-the-art facility: The existing building was constructed in 2019 and is equipped with translucent panels to reduce the need for artificial light and energy usage. When lighting is required, energy efficient lighting such as LED was installed on both the interior and exterior of the building.

How it works: Waste handling is performed entirely within the existing 32,500-square-foot building. The building includes tipping and inspection areas, temporary waste storage areas, and outbound rail and truck loading areas. Processing activities include advanced sorting equipment for the recovery of recyclables, which are then transported to recycling facilities. What we cannot recycle is transferred to its final disposal by rail.

Learn more

The proposed permit modification is subject to MEPA review, and MEPA will welcome public comment. Information about UMML, MEPA filings, and supporting documents can be found at www.ummleominster.com. Should you have questions about the UMML project, please contact comms@win-waste.com.

UNITED MATERIAL MANAGEMENT OF LEOMINSTER

UNA ESTACIÓN DE TRANSFERENCIA EN LEOMINSTER, MASSACHUSETTS



United Material Management of Leominster (UMML), ubicada en 200 Tanzio Road en Leominster, es una estación de transferencia de desechos de última generación con una línea ferroviaria integrada. La instalación se especializa en el reciclaje de desechos de construcción y demolición (construction & demolition, C&D) y la transferencia de desechos sólidos municipales (municipal solid waste, MSW) y desechos para la eliminación final responsable. La instalación recupera cientos de toneladas de materiales reciclables cada mes, que se envían a instalaciones de reciclaje para su reutilización en nuevos productos, lo que ayuda a conservar nuestros recursos naturales para las generaciones futuras. Lo que no podemos reciclar se transfiere para su eliminación final por ferrocarril, el modo de transporte terrestre con menos generación de carbono.

La modificación del permiso aumenta la capacidad de eliminación crítica de la región

A fin de satisfacer la creciente demanda de manejo de desechos en Massachusetts, UMML propone un proyecto, sujeto a la revisión de la Ley de Política Ambiental de Massachusetts (Massachusetts Environmental Policy Act, MEPA), que aumentará la capacidad de manejo en sus instalaciones actuales en Leominster. Actualmente, la instalación tiene permiso para procesar hasta 1,000 toneladas de desechos por día (TPD). Este proyecto aumentaría esa capacidad a 1,500 TPD sin requerir ninguna expansión del edificio para adaptarse al aumento en la manipulación diaria.

Esencial para la infraestructura de gestión de desechos de la región

Satisface la demanda regional: Con los recientes e inevitables cierres de grandes vertederos en la Mancomunidad (Commonwealth), existe una escasez de capacidad de desecho en la región que ejerce presión sobre los sistemas estatales que ya están haciendo un gran esfuerzo para satisfacer la demanda. Al aumentar la capacidad y la eficiencia de una estación de transferencia existente, UMML puede ayudar a satisfacer las demandas de la creciente población y cambiar los patrones de desechos en la región.

La línea ferroviaria integrada proporciona acceso a las salidas de desechos: La instalación está ubicada en un área que tiene acceso directo al ferrocarril. La conectividad ferroviaria de UMML proporciona la capacidad única de mover desechos donde hay espacio, lo que alivia la capacidad decreciente del estado y apoya el Plan Maestro de Desechos Sólidos del Departamento de Protección Ambiental de Massachusetts (MassDEP). La región recibe un mejor servicio mediante el uso de salidas de desechos que generalmente no son accesibles o viables a través de camiones tradicionales de larga distancia.







UNITED MATERIAL MANAGEMENT OF LEOMINSTER
UNA ESTACIÓN DE TRANSFERENCIA EN LEOMINSTER, MASSACHUSETTS

Ofrece una solución de gestión de desechos más sostenible

Reciclaje mejorado: UMML se especializa en la clasificación y el reciclaje de materiales de C&D y es un procesador de C&D en cumplimiento con el MassDEP. El sitio recupera cientos de toneladas de materiales reciclables cada mes para su reutilización en nuevos productos, y un aumento en la capacidad diaria permitida expandiría aún más las cantidades de reciclaje en el sitio. Los materiales reciclables incluyen asfalto, ladrillo, concreto, cartón, metales y madera.

Reduce las emisiones de gases de efecto invernadero: UMML emplea varias estrategias para reducir las emisiones de GEI. Las tácticas más impactantes implican consolidar los desechos antes del transporte, utilizar el transporte ferroviario en lugar de los camiones tradicionales siempre que sea posible y desviar los desechos de los vertederos que están llegando a su capacidad. Mover los desechos por ferrocarril es cuatro veces más eficiente en el consumo de combustible que los camiones en una autopista y tiene la huella de carbono más baja por tonelada de desechos transportados, lo que reduce las emisiones de GEI hasta en un 75 por ciento.

Instalaciones existentes ubicadas en un parque industrial: La instalación existente tiene una separación adecuada con cualquier espacio abierto designado, está fuera de hábitats y áreas residenciales mapeados, y está dentro de un área zonificada industrial. Al utilizar las instalaciones existentes, podemos aumentar la capacidad de eliminación de desechos regionales sin la necesidad de nuevas construcciones o espacio terrestre adicional.

Apoya la economía local: UMML contribuye significativamente al panorama económico local y genera ingresos para la ciudad de Leominster en forma de impuestos y regalías. El aumento de la capacidad de eliminación regional en UMML crea empleos, fomenta la inversión local y amplía aún más la base fiscal y los ingresos para la ciudad, al tiempo que reduce los costos de eliminación para los transportistas de desechos locales. Según la Oficina de Desarrollo Económico de Leominster, el desarrollo industrial en Leominster es una prioridad, ya que la región cuenta con una fuerza laboral altamente calificada dentro de las industrias manufactureras.

Instalaciones de última generación: La instalación existente se construyó en el 2019 y está equipada con paneles translúcidos para reducir la necesidad de luz artificial y uso de energía. Se instaló una iluminación de bajo consumo, como LED, tanto en el interior como en el exterior del edificio para cuando se requiere iluminación.

Cómo funciona: La manipulación de desechos se realiza completamente dentro del edificio existente de 32,500 pies cuadrados. El edificio incluye áreas de vuelco e inspección, áreas de almacenamiento de desechos temporales y áreas de carga saliente de trenes y camiones. Las actividades de procesamiento incluyen equipos de clasificación avanzados para la recuperación de materiales reciclables, que luego se transportan a instalaciones de reciclaje. Lo que no podemos reciclar se transfiere para su eliminación final por ferrocarril.

Más información

La modificación del permiso propuesta está sujeta a la revisión de la MEPA, y la MEPA aceptará comentarios públicos. Puede encontrar información sobre UMML, presentaciones de la MEPA y documentos de respaldo en www.ummleominster.com. Si tiene preguntas sobre el proyecto de UMML, envíe un correo electrónico a comms@win-waste.com.

ATTACHMENT 4

TABLE 4
RESPONSE TO MEPA COMMENTS SUMMARY AND CROSS-REFERENCE TABLE

Table 4: Summary and Response to MEPA Comments

MEPA Comment ID (Certificate page #)	Comment	Response
M-1(3)	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.	Final mitigation measures are identified in the FEIR in Section 7: Mitigation and Draft Section 61 Findings. Section 7 includes specific measures on minimizing off-site impacts in EJ populations associated with project-generated trucks and train traffic and other operations of the facility.
M-2 (9)	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. The Proponent is encouraged 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).	The Facility has engaged with the commenters, other members of the community, and the City throughout the duration of this project and will continue to do so as requested in the future. Another public meeting was not requested by the community, although additional public hearings will occur as part of the Site Assignment modification process.
M-3 (14)	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.	Tonnage limits for each type of waste on a daily basis and for overnight storage, and an estimate of the remaining capacity of the facility after the daily tonnage is increased to 1,500 tons are both addressed in Section 6.1.5 of the FEIR.
M-4 (16)	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.	Section 6.5.4 of the FEIR specifies the modeling assumptions and methods of the supplemental odor analysis.
M-5 (16)	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.	Section 6.1.6 of the FEIR discusses use of rail and permitting conditions.

Table 4: Summary and Response to MEPA Comments

MEPA Comment ID (Certificate page #)	Comment	Response
M-6 (20)	The FEIR should include a commitment by the Proponent to continue to monitor the compliance of customers of the facility with the directive regarding stopping along Lancaster Road enroute to or from the Facility.	Section 6.3.3 of the FEIR includes a commitment by the Proponent to continue monitoring the compliance of customers of the Facility with this directive.
M-7 (20)	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.	Section 6.1.6 of the FEIR discusses use of rail and permitting conditions.
M-8 (22)	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 FEIR generally follows Section 11.07 of the MEPA regulations as amended by the Scope in the DEIR Certificate.
M-9 (22)	The FEIR should comprehensively list and describe all proposed mitigation measures.	All proposed mitigation measures are listed and described in Section 7: Mitigation and Draft Section 61 Findings of the FEIR.
M-10 (22)	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.	An updated PIP with additional and revised methods for engaging with EJ populations based on feedback from the public is included in Attachment 3 of the FEIR.
M-11 (22)	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.	The Proponent's procedures for receiving and responding to complaints, including coordination with the City, MassDEP, and complainants is included in Section 6.2.5 of the FEIR.
M-12 (23)	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.	Section 6.2.6 of the FEIR provides an update to response efforts by the Facility.

Table 4: Summary and Response to MEPA Comments

MEPA Comment ID (Certificate page #)	Comment	Response
M-13 (23)	The FEIR should quantify the number of trees proposed to be planted to increase the vegetative barrier around the site.	Section 6.2.7 of the FEIR discusses tree planting at the Facility. Approximately 15 new trees are proposed on site.
M-14 (23)	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 NO2 indicators or implementing EV charging infrastructure for trucks.	Section 6.2.8 of the FEIR presents feasible mitigation measures to address cumulative air quality impacts on environmental justice communities which includes proposed on-site tree planting, agreement to install EV chargers at the site in the future as requested or warranted, and consideration of future support to the Commonwealths' GGCP and /or supporting programs for urban tree planting.
M-15 (23)	The FEIR should describe the activities conducted at the facility outside of waste acceptance hours under existing and proposed conditions.	Section 6.1.4 of the FEIR describes activities conducted outside of waste acceptance hours under existing and proposed conditions.
M-16 (23)	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.	Section 6.1.4 of the FEIR clarifies operating hours of the Facility verses approved waste acceptance hours.
M-17 (23)	The FEIR should confirm the tonnage limits that will be requested for each type of waste on a daily basis and for overnight storage.	Section 6.1.5 of the FEIR discusses proposed tonnage limits of daily waste and for overnight storage of each waste type.
M-18 (23)	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.	Section 6.1.5 of the FEIR discusses the estimated remaining capacity of the Facility after the daily tonnage is increased to 1,500 tons.
M-19 (23)	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	Section 6.1.6 of the FEIR discusses use of rail and permitting conditions.

Table 4: Summary and Response to MEPA Comments

MEPA Comment ID (Certificate page #)	Comment	Response
	off-site transport of non-recyclable materials after handling at the facility.	
M-20(23)	The FEIR should provide additional details about the supplemental odor analysis provided in the DEIR including the modeling assumptions used, if the model included covered rail cars, and how the results were assessed.	Section 6.5.4 of the FEIR specifies the modeling assumptions and methods of the supplemental odor analysis included in the DEIR; confirms full rail cars were assessed as covered; and what sustained odor concentration was used to determine if odors were impactful to receptors.
M-21 (23)	The FEIR should confirm that the emissions estimate 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.	Section 6.4.4 of the FEIR confirms emissions estimates for the 2025 Existing and 2032 No Build scenarios in the mesoscale analysis are for Facility-related trucks only and does not also include emissions from other vehicles in the transportation study area.
M-22 (23)	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.	Section 6.4.4 of the FEIR confirms improvement under future No Build conditions is attributed to clean truck mandates as the EPAs MOVES4 program utilized for analysis uses those emission factors; and its application to Facility-related trucks.
M-23 (23)	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.	Section 6.4.4 of the FEIR presents the conversions used to calculate VMT to TPY emissions estimates and confirms they are applicable to engine technologies used for solid waste truck engine technology.
M-24 (23)	The FEIR should discuss the feasibility of implementing charging infrastructure for trucks, in anticipation of future clean truck mandates.	Sections 6.2.8 and 6.4.4 of the FEIR discusses the consideration of charging infrastructure at the Facility.
M-25 (23)	The FEIR should include a separate chapter summarizing all proposed mitigation measures.	Section 7: Mitigation and Draft Section 61 Findings of the FEIR includes all mitigation measures.

Table 4: Summary and Response to MEPA Comments

MEPA Comment ID (Certificate page #)	Comment	Response
M-26 (24)	Draft Section 61 Findings should be separately included for each Agency Action to be taken on the project.	Section 7: Mitigation and Draft Section 61 Findings of the FEIR includes all Section 61 Findings for each Agency Action.
M-27 (24)	The FEIR should contain a direct response to the scope items in this Certificate and to comments received on the DEIR.	Section 8 of the FEIR includes a Response to Public Comments on the DEIR including those received from residents, MassDOT and MassDEP. The FEIR Narrative and attachments were prepared as direct responses to the scope items in the Certificate, and this table (Table 4 included as Attachment 4), provides summary responses to MEPA comments and scope items.
M-28 (24)	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.	Sections 8.2 through 8.5 of the FEIR include direct responses to comments (within MEPA jurisdiction) and where appropriate includes references to report sections in which additional information can be found.

ATTACHMENT 5

DEIR COMMENT LETTERS

COMMENT CODE: HB 1-3

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

COMMENT CODE: MassDOT 1

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*.

COMMENT CODE: MassDEP 1-3

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

COMMENT CODE: SA-1

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

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.



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.

COMMENT CODE: SA-2

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

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

COMMENT CODE: SA-1

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

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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.
>
> 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

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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.

COMMENT CODE: SA 1

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

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.

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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> 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.
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100 Cambridge Street

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