

**Table 18: Summary and Response to MEPA Comments**

| <b>MEPA<br/>Comment ID<br/>(Certificate<br/>page #)</b> | <b>Comment</b>                                                                                                                                                                            | <b>Response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| M-1(2)                                                  | The DEIR should confirm the number of non-truck vehicle trips under existing and proposed conditions.                                                                                     | The number of non-truck vehicle trips is confirmed to be the same as previously estimated at 42 average daily trips per day. This is identified in <i>Chapter 6.3</i> , subsection <i>Trip Generation</i> on p. 64 of the DEIR.                                                                                                                                                                                                                                                                |
| M-2 (2)                                                 | Identify additional 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. | Additional mitigation measures besides the use of best management practices include upgrades to the atomized misting system for odor controls, closing one-door after 4 pm, prohibiting trucks from queuing along Lancaster Road prior to facility opening, air ventilation system modifications, and continued use of rail to minimize traffic and emissions, and others. Mitigation measures are presented in <i>Chapters 6.3, 6.4, 6.5, 6.6, 6.7</i> , and summarized in <i>Chapter 8</i> . |
| M-3 (3)                                                 | The DEIR should be prepared in accordance with 301 CMR 11.07, for outline and comment.                                                                                                    | The DEIR follows the format as specified at 301 CMR 11.07(6). <i>Chapter 1</i> provides subsection “DEIR Format” stating this.                                                                                                                                                                                                                                                                                                                                                                 |
| M-4 (3)                                                 | The DEIR should provide detailed plans, sections, and elevations to accurately depict existing and proposed conditions, resiliency, and other mitigation measures.                        | Facility Resilience is addressed in <i>Chapter 7</i> of the DEIR. Facility plans that represent both existing and proposed conditions, as no construction is proposed, are included in Attachment 2. Plans show that the Facility is built well above floodplain and the stormwater system evaluated in <i>Chapter 7-Climate Change</i> indicates the stormwater system is currently constructed to handle the 10-year storm event at 2070 projected rainfall intensities.                     |
| M-5 (3-4)                                               | The DEIR should identify, describe, and assess the environmental impacts of any changes in the project that have occurred between the preparation of the ENF and DEIR.                    | <i>Chapter 2</i> of DEIR states there have been no changes to the project since the ENF.                                                                                                                                                                                                                                                                                                                                                                                                       |

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| M-6 (4)                                                 | The DEIR should identify and describe permitting and review requirements associated with the project; provide an update on the status of each; and analyze applicable statutory and regulatory standards and requirements; and provide a discussion of the project's consistency with those standards.                                                                                                                                                                                                                                                                                                                              | <i>Chapter 2</i> identifies the one state permit (Modification to Large Handling Facility, BWP SW 07) and one local approval (modification to site assignment) required for the project that will be sought after the MEPA process. <i>Chapter 6.1</i> summarizes the project's compliance with the Solid Waste Regulations in which local site assignment and modification to the ATO permit is based upon.                                                                                                |
| M-7 (4)                                                 | The information and analyses should be addressed within the main body of the DEIR and not in appendices. In general, the appendices should only provide raw data.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Substantive information and analyses are included within the narrative of the DEIR. Sources of tables and figures included in the reports within the Attachments are referenced and the electronic document is indexed to facilitate review.                                                                                                                                                                                                                                                                |
| M-8 (5)                                                 | 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. | <i>Chapter 4 Alternatives to the Project</i> presents the alternatives to the project including those in the 2023 ENF (Alternatives 1 & 2), sites evaluated in the 2018 ENF (Alternatives 3 & 4), and new sites (Alternatives 5 & 6). Each of these describes the environmental impacts of each alternative. One new alternative was identified outside of an EJ area, as verbally requested by MEPA.<br><br>As the current location and the Preferred Alternative are the same, no comparison is provided. |
| M-9 (6)                                                 | The DEIR should include an updated PIP; and be sent to an updated EJ Reference list. A pre-filing public meeting shall be held, with consultation from MEPA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | An updated PIP is included as Attachment 9 of the DEIR. The updated EJ Reference list is included within the PIP as sub-Attachment 2. Chapter 10 of the DEIR provides a                                                                                                                                                                                                                                                                                                                                     |

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| <b>MEPA<br/>Comment ID<br/>(Certificate<br/>page #)</b> | <b>Comment</b>                                                                                                                                                                                                                                      | <b>Response</b>                                                                                                                                                                                                                                                                                                                                                               |
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|                                                         |                                                                                                                                                                                                                                                     | summary of the pre-filing public meeting and the advance notice conducted following the May 20, 2025 consultation with MEPA.                                                                                                                                                                                                                                                  |
| M-10 (6-7)                                              | 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.                                                            | <i>Chapter 6.2 Impacts Environmental Justice</i> (p. 46) includes a summary table of DEIR scope items related to Environmental Justice. <i>Chapter 6.6</i> and Attachment 6 of the DEIR address the baseline assessment, which is found to not represent an unfair or inequitable environmental burden.                                                                       |
| M-11 (7)                                                | The DEIR should use the DPH EJ Tool to identify any census tract or municipality in which the EJ populations exhibit vulnerable health criteria.                                                                                                    | <i>Chapter 5.10-Public Health</i> (p. 35) identifies Heart Attack as a Vulnerable Health Criteria as sourced from the DPH EJ Tool. <i>Chapter 6.6</i> (pp. 88-89) further discusses environmental burden in regard to this criteria.                                                                                                                                          |
| M-12 (7)                                                | The DEIR should identify sources of potential pollution within the identified EJ population using DPH EJ Tool mapping layers.                                                                                                                       | <i>Chapter 5.10 Public Health</i> (p. 37) and <i>Chapter 6.6 Potential Sources of Pollution</i> (p. 89) and Table 11 identifies sources of potential pollution. A total of 38 potential sources of pollution from 13 different source types were identified within 1 mile of site.                                                                                            |
| M-13 (7)                                                | The DEIR should identify any air quality indicators in EPAs EJ Screen that are elevated at or above the 80 <sup>th</sup> percentile, and provide these data for each census block, and where appropriate along truck routes outside the 1-mile DGA. | <i>Section 6.6 Environmental Indicators</i> (p. 91) and Table 12 identifies air quality indicators. There was one EJ block with a Nitrogen Dioxide indicator, two EJ block with a lead paint indicator, five EJ blocks with a superfund proximity indicator, two EJ blocks with a hazardous waste proximity indicator, and one EJ block with a UST indicator at or above 80%. |
| M-14 (7)                                                | The DEIR should identify the number and type of facilities within 1 mile that operate under MassDEP Air or solid waste permits,                                                                                                                     | <i>Section 5.10 Public Health</i> (p. 37) and Table 11 in <i>Section 6.6</i> (p. 90) identifies air and waste permits within 1-mile. There are no facilities with air permits or active solid                                                                                                                                                                                 |

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|                                                         | and how this total compares to statewide totals.                                                                                                                                                                                                                                                                                                           | waste operating permits within 1-mile of the Facility.                                                                                                                                                                                                                                                                                                                                                                                                   |
| M-15 (7)                                                | The DEIR should identify other truck routes and the number of project-generated trucks.                                                                                                                                                                                                                                                                    | <i>Section 6.3 Impacts-Traffic</i> presents the updated traffic study conducted to assess traffic to the north of the Facility. Figures 13 and 14 present the distribution of trucks for each route.                                                                                                                                                                                                                                                     |
| M-16 (7, 13)                                            | The DEIR should provide a Mesoscale air quality analysis.                                                                                                                                                                                                                                                                                                  | <i>Section 6.6</i> presents the Mesoscale Analysis (pp. 98-103) and supporting calculations are included in Attachment 6.                                                                                                                                                                                                                                                                                                                                |
| M-17 (7)                                                | The DEIR should analyze asthma prevalence for K-8 schools using the Cumulative Impact Analysis Method and report any rates above the statewide average.                                                                                                                                                                                                    | <i>Section 6.6</i> (pp. 92-94) addresses pediatric asthma prevalence. The one nearby school that had data available indicated the asthma prevalence is 10.7% which is 87% of the state rate.                                                                                                                                                                                                                                                             |
| M-18 (7)                                                | The DEIR should discuss the extent to which Transportation Demand Management (TDM) measures will serve to reduce diesel vehicle traffic associated with project operations. The DEIR should discuss other potential mitigation measures. If impacts are unavoidable, the DEIR shall consider measures to improve air quality in affected EJ neighborhoods. | <i>Chapter 6.4 subsection Emissions from Mobile Sources</i> (pp. 79-80) addresses TDM measures and mitigation, as well as Section 2.2 within Attachment 6. Although identified project TDM measures will not mitigate diesel-related traffic, the use of rail and backhauls are the two most significant mitigation measures to reduce diesel vehicle traffic. Additional tree plantings at the Facility can help offset carbon impacts in the vicinity. |
| M-19 (7-8; 10)                                          | The DEIR should describe measures to be implemented to further minimize impacts as identified by commenters. It should identify potential sources of noise associated with transport of waste and review alternatives for minimizing impacts.                                                                                                              | <i>Chapter 2, subsection Summary of Measures to Avoid or Minimize Damage</i> (p. 6) summarizes both measures to avoid or minimize damage and mitigation measures to address impact. <i>Chapter 9- Response to Comments</i> (pp. 124-132) summarizes each comment received during the ENF process and provides a response including discussion of mitigation measures, of which some have already been implemented (CSX                                   |

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|                                                         |                                                                                                                                                                                                                        | coordination, misting system upgrades, enforcement on early morning queuing). <i>Chapter 6.5-Impacts-Sound</i> (p. 82+) addresses sources of noise and mitigation measures.                                                                                                                                         |
| M-20(8)                                                 | The DEIR should include a discussion of proposed mitigation and include such measures in draft Section 61 findings.                                                                                                    | Mitigation measures are included in the draft Section 61 findings presented in <i>Chapter 8</i> (p.115+)                                                                                                                                                                                                            |
| M-21 (8)                                                | The DEIR should include a separate section on “Public Health” an discuss any known or reasonably foreseeable public health consequences that may result from the environmental impacts of the project.                 | <i>Chapter 5.10</i> (p. 35+) is a separate section on Public Health. The public health assessments and analyses included in <i>Chapters 6.4 and 6.6</i> further discuss public health and concludes the project will have negligible environmental impacts and is unlikely to result in public health consequences. |
| M-22 (8)                                                | Other publicly-available data including the DPH EJ Tool should be surveyed to assess the public health conditions in the immediate vicinity of the project site in accordance with 310 CMR 11.07(6)(g)10.              | Public Health conditions in the vicinity of the site include one vulnerable health criteria, and air quality well below NAAQS, as presented in <i>Chapter 5.10</i> .                                                                                                                                                |
| M-23 (8)                                                | The DEIR should contain specific discussion of any permit-required performance standards that are intended to public health and how the project intends to meet or exceed them.                                        | <i>Chapter 6.1-Impacts- Solid Waste</i> (p. 39+) identifies the projects compliance with the solid waste regulations and its current operating permit.                                                                                                                                                              |
| M-24 (8)                                                | 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. | <i>Chapter 5.10</i> (p. 37) and Table 11 within <i>Chapter 6.6</i> identifies there are no nearby facilities with air permits. <i>Chapter 6.6</i> also provides analysis of predicted Project Impacts (pp. 100-103) which discusses air quality in the area.                                                        |
| M-25 (8)                                                | 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).                                         | Table 3 in <i>Chapter 5.10</i> (p. 38) summarizes the Air Monitoring Data and applicable NAAQS. Air Quality in the area is under the NAAQS.                                                                                                                                                                         |

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| M-26 (9)                                                | The DEIR should review existing permitting requirements established by MassDEP and 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.                                                                                                                                                                                                                                                   | <i>Chapter 6.1</i> (pp. 39-42) identifies existing permit conditions and provides an assessment of how the facility can accommodate the tonnage increase within the existing building and using BMPs.                                                                                                    |
| M-27 (11)                                               | The odor study included in the ENF appeared to have excluded full rail cars from the analysis therefore the DEIR should explain how the full railcars are either accounted for in the analysis or through other means under existing and proposed conditions, and identify mitigation measures implemented by the Proponent to minimize odors from exterior sources.                                                                                                                                                                               | The odor modeling was updated to include full rail cars. <i>Chapter 6.7</i> (pp. 110-112) and the Odor Study Update included in Attachment 5 addresses odor from railcars and mitigation measures.                                                                                                       |
| M-28 (11,12)                                            | The DEIR should include a review of any odor complaints received and the incidences identified in the comment letters. The Proponent should review the 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 Odor/Air Quality section of <i>Chapter 9 Response to Comments</i> (pp. 129-130), Complaint Log Summary in Attachment 8, and the Odor Study Update in Attachment 5 present a review of the odor complaints and best management practices, both existing and proposed to mitigate for potential odors. |
| M-29 (12)                                               | 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 BOH or MassDEP permit.                                                                                                                                                                                                                                                                         | <i>Chapter 6.7</i> (p. 112) presents odor mitigation strategies related to storage. Storage limitations are currently included in the MassDEP operational permit.                                                                                                                                        |

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| M-30 (13)                                               | The DEIR should identify any additional measures that can be implemented by the Proponent to further minimize air emissions associated with the operation of the facility.                                                                                                                                                                                 | <i>Chapter 6.6</i> (pp. 103-104) discusses mitigation measures to minimize air emissions which includes but is not limited to the use of rail and backhauls, maintaining the electrically-powered processing line, adhering to anti-idling regulations on site, planting trees at the Facility, and utilizing current employee vanpool.                                                               |
| M-31 (13)                                               | The DEIR should provide additional documentation in support of the estimate of new truck trips that will bring waste to the site; describe the type and capacity 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.                                    | <i>Chapter 6.3 Impacts-Traffic, Future Conditions</i> (p. 64) presents the trip generation data and basis of average truck capacity. Appendix E of Attachment 3 tabulates the truck tickets, waste type, and tonnage. The average used in all the Air and Traffic studies are derived from real data presented in that table.                                                                         |
| M-32 (15)                                               | 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.                                                                                                            | <i>Chapter 6.3</i> (p. 64) addresses employee vehicle trips. As the facility opens and closes outside of the peak traffic hours, employee vehicles are excluded from the hourly distribution and peak hour impact assessment.                                                                                                                                                                         |
| M-33 (15)                                               | 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. | <i>Chapter 6.4 Impacts-GHG Emissions</i> and <i>Chapter 6.5- Impacts Sound</i> (p. 83) discusses queuing and protocols in place to discourage early arrivals and mitigate sound and air impacts.<br><i>Chapter 6.1 Impacts- Solid Waste</i> (p. 41) addresses on-site queuing capacity which is ample in consideration of by-pass truck lanes, multiple scales, and overall circular traffic pattern. |
| M-34 (15)                                               | 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                                                                                                                                                                                                  | Figures 13 and 14 in <i>Chapter 6.3 Impacts-Traffic</i> (pp 57-58) indicate truck routes by truck type traveling south to/from Tanzio Road to I-190 and/or Willard Street and                                                                                                                                                                                                                         |

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|                                                         | locations that do not require access from I-190.<br>The DEIR should quantify the number and hourly distribution of said trucks, and this analysis shall be correlated to impacts to EJ populations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | north to/from Viscoloid Avenue or Lancaster Street. Data indicates the majority of trucks are traveling to/from I-190 to the south which is in an EJ area but is also a commercial/industrial area.<br><br>The hourly distribution presented in Tables 5 and 6 (pp. 66 and 67, respectively) represents the total quantity of trucks accessing the facility. |
| M-35 (15)                                               | The DEIR should include an assessment of the resilience of the facility under the projected 2070 climate conditions using data available through the MA Resilience Design Tool. The DEIR should describe the stormwater system, including measures required of LUHPPLs, 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 the stormwater system, that will provide resiliency to the identified climate risks; and identify potential adaptation strategies that could be implemented in the future, if necessary to respond to unanticipated climate risks. | <i>Chapter 7 Climate Change</i> (p. 114) provides this description and assessment which indicates that the current stormwater system will handle the 10-year storm event for the 2070 climate conditions without modification.<br>Attachment 10 includes the 2070 climate conditions used to evaluate the stormwater system.                                 |
| M-36 (16)                                               | The DEIR should report on the anticipated GHG emissions using the GHG Emissions Footprint Estimation Tool. The DEIR should provide a GHG analysis if stationary source emissions for conditioned spaces exceed 2000 tpy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <i>Chapter 6.4 Impacts-Greenhouse Gas - Emissions</i> (p. 77) identifies the calculated GHG emissions to be 80 tpy, under the 2000 tpy threshold, therefore no GHG analysis was required/provided. The calculation is included in Appendix A of Attachment 6.                                                                                                |
| M-37 (16)                                               | The DEIR should include an evaluation of potential GHG emissions associated with the project's mobile sources emissions and follow the guidance in the GHG Policy for Indirect Emissions from transportation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <i>Chapter 6.4 Impacts-Greenhouse Gas Emissions</i> (pp 78-80) provides the evaluation for the three conditions and on-site operations and idling, with                                                                                                                                                                                                      |



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|                                                         | to determine mobile emissions for existing, build, and build with mitigation conditions. The DEIR should describe truck loading and staging activities, and estimate GHG from idling. 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 reduction impacts rather than an assumed percentage reduction. | consideration of TDMs, with Table 10 summarizing the project's emission burden of 5.07 tons/year in comparison to No-build conditions (assuming no rail, thereby presenting worst-case impacts).                                                                                                                                       |
| M-38 (16)                                               | The Proponent should explore means to reduce overall single-occupancy vehicle trips, minimize air emissions from diesel vehicle traffic; review measures to promote the use of low-emission vehicles, including installing EV charging stations with designated parking.                                                                                                                                                                                                                                                                                                    | <i>Chapter 6.4 Impacts- Greenhouse Gas Emissions</i> (p. 79) discuss TDMs, and how only approximately 10% of the overall traffic is employee passenger vehicles that would benefit from many of the typical TDM measures. Diesel truck traffic cannot be directly mitigated with alternative transportation measures.                  |
| M-39 (16)                                               | The DEIR should include a separate chapter summarizing all mitigation measures and provide Draft Section 61 Findings.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <i>Chapter 8 Mitigation and Draft Section 61 Findings</i> (pp 115-123) includes all Section 61 Findings along with potential measures to implement in the future in tabular form (Table 16).                                                                                                                                           |
| M-40 (16-17)                                            | The DEIR should contain a copy of this Certificate and a copy of each comment letter received on the ENF. The DEIR should include direct responses to comments on the ENF and the scope items in the Certificate that specifically address each issue raised in the comment letter or Certificate.                                                                                                                                                                                                                                                                          | <i>Chapter 9: Responses to Comments</i> addresses all comments made regarding the December 2024 ENF, and includes page numbers with applicable information to the responses. This table (Table 18) submitted as supplemental info summarizes responses to MEPAs comments within the ENF Certificate that is addressed within the DEIR. |