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May 11, 2018

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

PROJECT NAME : Casella of Holyoke
PROJECT MUNICIPALITY : Holyoke
PROJECT WATERSHED : Connecticut River
EEA NUMBER : 15841
PROJECT PROPONENT : Casella of Holyoke, Inc.
DATE NOTICED IN MONITOR : April 11, 2018

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the Proponent is requesting an increase in the permitted capacity of the solid waste transfer facility from 750 tons per day (tpd) to 1,250 tpd. The facility will continue to handle municipal solid waste (MSW), construction and demolition (C&D) debris, and recyclables. No physical expansion of the facility is proposed; a set of operational changes will be implemented to improve the efficiency of waste handling and processing.

All solid waste handling and processing occurs within an existing 33,270-square foot (sf) building. The approximately 10,754-sf western section of the building was added in 2017 to provide sorting and mechanical processing equipment to facilitate removal of recyclable material from C&D waste. The remainder of the building includes tipping floors for MSW, processing

equipment, and loading areas for outbound material. All vehicles enter the site from Berkshire Street, drive across the scale, proceed to the C&D or MSW tipping areas, and utilize the scale before exiting onto Berkshire Street. Some post-processing C&D waste is removed from the site by rail cars that enter and exit the south end of the building on a spur line of the Pioneer Valley Railroad (PVRR). The PVRR line runs along the Connecticut River south of the site.

Changes to support the increased capacity include the installation of a truck scale on the west side of the building and a second truck access point on an adjoining parcel to the south which is owned by the Proponent. The scale on the north side of the site and the entrance on Berkshire Street will continue to be used by other trucks. The proposed entrance will be used primarily by smaller trucks such as roll-off and packer-type trucks. All trucks exiting the site will be weighed on the existing scale and exit onto Berkshire Street. The proposed entrance and scale will improve the flow of trucks through the site by reducing the number of vehicles using the same entrance and by providing a more direct route for trucks carrying C&D material to the tipping floor in the western part of the building.

Site Description

The 2.10-acre site is located in an industrial section of Holyoke that is zoned for waste management. The facility is bounded by Berkshire Street to the northeast, Main Street to the northwest, Holyoke's wastewater treatment plant to the southeast, and industrial uses, including the facility's management offices, to the southwest. Interstate-391 (I-391) terminates approximately 2,000 feet to the north; on-ramps from Main Street to I-391 South and off-ramps from I-391 North onto Main Street are located approximately 800 feet northwest of the site.

Permits and Jurisdiction

The project is undergoing review and requires an ENF pursuant to 301 CMR 11.03(9)(b) of the MEPA regulations because it requires a State Agency Action and will result in new capacity for the storage, treatment or processing of 50 or more tpd of solid waste. The project requires a Site Suitability Report for a Major Modification to an Existing Site Assignment and a Modification of a Large Handling Facility from the Massachusetts Department of Environmental Protection (MassDEP). The project is subject to the Executive Office of Energy and Environmental Affairs' (EEA) Environmental Justice (EJ) Policy. It will require a Major Modification of the existing Site Assignment from the Holyoke Board of Health.

Because the Proponent is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required State Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations. In this case MEPA jurisdiction extends to solid waste.

Environmental Impacts

The project will increase the permitted capacity of the Facility to support an additional 500 tpd of MSW, C&D debris, and recyclables. According to the ENF, the increased capacity

will add 158 new truck trips per day (446 daily trips total), including 18 new trips during each of the morning and evening peak hours. Measures to avoid minimize, and mitigate project impacts include limiting all discharge and handling of solid waste to the enclosed tipping floors, minimizing the time that waste is on the tipping floor and the use of dust and odor controls.

Review of the ENF

The ENF provided a description and plans of existing and proposed conditions, a discussion of project alternatives, a Traffic Impact and Access Study, a copy of the Site Suitability Modification application submitted to MassDEP, and identified measures to avoid, minimize and mitigate project impacts. Consistent with the enhanced outreach requirements of the EJ Policy, the Proponent published Spanish-language versions of the MEPA Public Notice and site visit notification in a local newspaper and on its website.

Alternatives Analysis

The project is intended to address a need for solid waste handling capacity in Holyoke and the Pioneer Valley due to the impending closure of nearby landfills in Chicopee and Southbridge. The ENF included an alternatives analysis that evaluated a No Build alternative and two alternative locations that could accommodate handling of additional waste tonnage. The No Build alternative would avoid the traffic and air quality impacts of the project, but it was rejected by the Proponent because it would not address the need for solid waste handling in the region. Alternative A would include the construction of a new handling facility on a 1.63-acre City-owned lot on the north side of Berkshire Street. It is the site of a former incinerator, and is now used for leaf and yard waste composting. The site is located within the Waste Management zoning district but it has not been site assigned for MSW or C&D. It has good access to the regional highway system and is of sufficient size to accommodate a transfer facility, but the configuration of the lot would not provide an efficient truck circulation pattern. The Proponent rejected this alternative because it would require the demolition of the incinerator building and stack, would require new permitting, including a site assignment for MSW and C&D, does not have rail access and would have increased impacts associated with the construction of a new facility. In addition, operational impacts of the Alternative A facility would likely be greater than the Preferred Alternative due to the need for more truck trips in the absence of rail access. Alternative B would include construction of a new facility at the Chicopee landfill. The facility has good access to the regional highway system and sufficient space available for a new transfer station, but does not include rail service. The landfill is appropriately site assigned and a transfer station could be permitted as part of the post-closure use of the site. This alternative was rejected because wetlands are present at the site, construction of a new facility would have greater impacts than the Preferred Alternative and it does not have rail access.

The Preferred Alternative continues the use of the existing facility, requires a minimal amount of new construction and does not add impervious area. It does not require a new site assignment and will continue to use rail service for disposal of wastes. Waste handling will continue to be confined within the building and air emissions and odor controls will be upgraded if necessary.

Solid Waste

The facility will increase its daily tonnage from 750 tpd to 1,250 tpd and from 234,000 tons to 382,500 tons on an annual basis. The facility's hours of operation will not change as a result of the project. It will operate Monday through Saturday with no restrictions on truck traffic between 6:00 AM and 6:00 PM; during the evening and early morning hours, trucks must use the most direct route between I-391 and the site.

The ENF included a copy of the Major Modification of an Existing Site Assignment (BWP SW 38) permit application submitted to MassDEP. The project will also require the filing of a Modification of a Large Handling Facility (BWP SW 07) application. According to MassDEP, the Proponent will be required to manage, process, handle, and dispose of all solid waste and recyclable materials in accordance with Site Assignment Regulations for Solid Waste Facilities (310 CMR 16.00) and Solid Waste Facility Regulations (310 CMR 19.00), including the waste ban regulations (310 CMR 19.017). I refer the Proponent to MassDEP's comments regarding the processing of Asphalt, Brick, and Concrete (ABC) and the prohibition on knowingly accepting asbestos and asbestos-containing material.

Site operations should be managed in accordance with applicable MassDEP Solid Waste and Air Pollution Control regulations pursuant to M.G.L. c.40, §54. Nuisance odors and dust will be managed by the following means:

- Conducting all handling within the building;
- Using rapid-opening overhead doors to minimize exposure to outside air;
- Using a misting system with an odor-neutralizing agent;
- Operating a negative pressure ventilation system with odor control processes;
- Removing all waste off the floor a minimum of two to three times a week;
- Sweeping paved areas at regular intervals; and
- Wetting paved surfaces to control dust.

According to MassDEP, additional odor control measures using Best Available Control Technology (BACT) may be required. The Proponent may also be required to modify its existing Waste Ban Compliance Plan to account for the additional waste to be handled at the facility.

Traffic and Transportation

The project will generate an additional 158 daily truck trips for a total of 446 trips per day. The project will add 18 trips in each of the morning and evening peak periods. The ENF included a Supplemental Traffic Impact and Assessment Study (STIA) that analyzed traffic operations at four nearby intersections under 2017 Existing, 2024 No Build and 2025 Build conditions. According to the STIA, project-generated trips will not have any significant effects on traffic operations at these intersections.

The STIA did not analyze traffic operations associated with the proposed entrance. Trucks currently access the site by making a left turn from the left lane of Main Street onto

Berkshire Street. The proposed entrance will require that trucks make a left turn off Main Street approximately 500 feet south of the intersection of Main Street at Berkshire Street, where Main Street is only one lane in each direction. As noted by MassDEP, vehicles seeking to continue south on Main Street will not be able to pass a truck making a left turn into the new entrance. MassDEP may require the Proponent to consider alternative routes or roadway mitigation measures to mitigate impacts on Main Street through-traffic.

The Proponent may seek to increase the amount of processed waste material transported off-site by the PVRR rail system. The ENF included documentation from the PVRR that it could accommodate five additional rail cars with some modifications to its railyard south of the site. During the permitting process, MassDEP will require the Proponent to submit additional information on the potential increased use of the PVRR system, including storage of loaded cars.

Conclusion

Based on a review of the ENF and comments received, and in consultation with State Agencies, I have determined that the ENF has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts can be avoided, minimized and/or mitigated to the extent practicable. No further MEPA review is required. The project may proceed to state permitting.

May 11, 2018

Date

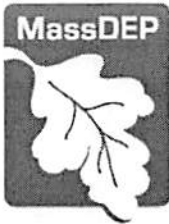


Matthew A. Beaton

Comments received:

05/01/2018 Massachusetts Department of Environmental Protection (MassDEP)- Western Regional Office (WERO)

MAB/AJS/ajs



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Casella 15841

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May 1, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Alex Stysky, EEA No. 15841
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: Casella Holyoke - Transfer Station ENF
Holyoke, MA

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted for the proposed Casella Holyoke, Inc. Transfer Station project at 700 Main Street in Holyoke (EEA #15841). The applicable MassDEP regulatory and permitting considerations regarding air pollution, solid waste, and waste site cleanup are discussed.

I. Project Description

The Proponent seeks to increase the accepted daily/annual tonnage and modifications to the operation at the facility to improve efficiency of waste handling. The Facility is an existing municipal solid waste (MSW) and construction and demolition waste (C&D waste) transfer station that also operates processing equipment to separate recyclable materials from C&D waste. The Proponent proposes to increase the permitted tonnage limit from 750 tons per day and 234,000 tons per year to 1,250 tons per day and 382,500 tons per year. The Proponent also intends process changes to increase efficiency to accommodate the increased tonnage per day.

The project requires MassDEP permits *BAW SW 38 - Site Suitability for a Major Modification to an Existing Site Assignment* and *BAW SW 07 - Modification of a Large Handling Facility* from MassDEP. The project also requires approval of the proposed change to the *Site Assignment* from the Holyoke Board of Health.

Environmental impacts associated with this project include:

- Increased tonnage per day from 720 to 1,250, and
- 158 additional vehicle trips per day, (228 to 446).

II. Required Mass DEP Permits and/or Applicable Regulations

Air Pollution

310 CMR 7.00

Solid Waste

310 CMR 16.00

Bureau of Waste Site Cleanup

310 CMR 40.000

III. Permit Discussion

Bureau of Air and Waste

Air Pollution Control

The operations at the site must conform to current Air Pollution Control Regulations. The proponent should implement measures to alleviate dust, noise, and odor nuisance conditions that may occur during operation. Such measures must comply with the MassDEP's Bureau of Air and Waste Prevention (BAW) Regulations 310 CMR 7.01, 7.09, and 7.10.

Solid Waste

Existing operations included both waste handling and processing to separate recyclable materials from C&D waste and MSW processing and transport. The Proponent proposes to increase the permitted tonnage limit from 750 tons per day and 234,000 tons per year to 1,250 tons per day and 382,500 tons per year. The Proponent also intends process changes to increase efficiency to accommodate the increased tonnage per day.

On April 9, 2018, the Proponent filed a *BAW SW 38, Major Modification of an Existing Site Assignment* permit application. MassDEP will review the application, prepare a *Report on Suitability* and forward that Report with recommendations and accompanying record to the Board of Health for the Board's review. The Holyoke Board of Health is the issuing agency for the actual *Site Assignment Modification*.

A previous Site Assignment required a Waiver from the 100 foot setback between the waste handling area and two property lines. This proposal would not affect the distance from the waste handling area to any property lines, so it appears that no further waivers to the setback criteria are necessary.

As noted, the proposed increase in tonnage will require filing a *BAW SW 07, Modification of a Large Handling Facility* MassDEP permit application. MassDEP staff have met with the Proponent and discussed the proposal and will continue to be available for pre-permitting discussions and/or a meeting to provide additional permitting guidance to the Proponent.

Any MassDEP permit issued will detail that the Proponent shall properly manage, process, handle, and dispose of all solid waste and recyclables received by this proposed project pursuant to 310 CMR 16.00 and 310 CMR 19.000, including the regulations at 310 CMR 19.017 (waste ban). In addition, regulation requires that the Proponent shall not knowingly accept asbestos and asbestos-containing waste material and that any regulated asbestos and asbestos-containing waste material, be managed as special wastes in accordance with 310 CMR 19.061.

Asphalt, brick and concrete (ABC) generated through processing and crushing shall be handled in accordance with MassDEP regulation and policy. The proponent may need to obtain a Beneficial Use Determination (BUD) for the reuse of certain materials.

MassDEP has identified the following facility permitting requirements, design features, and operational issues which could potentially be affected by the acceptance of MSW and contaminated soils:

- *Air Quality, nuisance odors and dust:* The Proponent has proposed several strategies to prevent nuisance conditions, including conducting all waste handling operations within the building; the use of rapid opening overhead doors to minimize the amount of open time; using a water misting system in the building that incorporates an odor neutralizing agent; operating a negative pressure ventilation system within the building and treating the discharged air with an odor neutralizing agent; removing all waste off the floor a minimum of two to three times per week; sweeping paved areas at regular intervals; and wetting paved surfaces to control dust. The Proponent is advised that Best Available Control Technology may be required to mitigate any nuisance odors generated.
- *Storage of MSW in railcars:* The Proponent has proposed to continue using railcars to ship waste by rail. Issues such as the number of loaded railcars stored outside the facility building and the length of time prior to transfer off-site are not addressed in the proposal. The ENF does contain a letter from the Pioneer Valley Railroad (PVRR) that states that the total storage capacity for loaded and unloaded railcars is about fifteen, and that an additional five railcars could be accommodated with site modifications. PVRR states that it is highly optimistic about the ability to handle the increased capacity, but additional details are not provided. MassDEP will review any proposed outside storage of MSW in railcars at the site, and associated storage timeframes, during the permitting process.
- *Waste Ban Compliance:* MassDEP will review the application and require the Proponent to update the facility *Operations & Maintenance (O&M)* plan, to specifically include a *Waste Ban Compliance Plan*. Procedures will be required that ensure compliance with current MassDEP regulations, policies and guidance specifically as related to C&D and MSW loads. The facility's current *Waste Ban Compliance Plan* may need to be modified to account for the greater amounts of waste that will be handled.
- *Facility Building:* The Proponent has not proposed an addition to the building. The *Operations & Maintenance Plan* for the facility shall be updated to describe how the greater amounts of C&D and MSW will be managed within the existing facility.
- *Traffic:* Included in the ENF is a Supplemental Traffic Impact Assessment (STIA) that analyzes potential impacts from the additional truck traffic (158 TPD) that will be generated by the proposed expansion. As part of the Site Suitability Report MassDEP will review potential traffic impacts from an expansion and has preliminarily reviewed the STIA and makes the following observations.

The STIA assumes that all truck traffic will enter Berkshire Street instead of Stebbins Street. Although this is a conservative assumption with respect to the Berkshire

Street/Main Street intersection, the STIA does not address potential impacts on the Stebbins Street/Main Street intersection from increased traffic.

MassDEP notes that Southbound Main Street transitions from two lanes in each direction (a 4 lane roadway) to one lane in each direction (a 2 lane roadway) at the Berkshire Street/Main Street intersection. Southbound Main Street traffic are able to pass trucks waiting to turn left onto Berkshire Street, but may be unable to pass trucks waiting to turn left onto Stebbins Street. Increased traffic turning onto Stebbins may result in a choke point/bottleneck of southbound traffic on Main Street during peak periods. MassDEP recommends the Proponent revisit the STIA and include anticipated traffic impacts on the Stebbins Street/Main Street intersection. If additional analysis indicates potential traffic backup, the Proponent should propose alternative routing or mitigation measures.

The Proponent is advised that debris generated by alteration of the site shall be disposed of at a properly licensed solid waste disposal facility, as defined at M.G.L. Chapter 111, Section 150, and in accordance with M.G.L. Chapter 40, Section 54.

Bureau of Waste Prevention

The Massachusetts Contingency Plan (MCP) and regulation 310 CMR 40.0000 governs the cleanup of confirmed oil and hazardous material releases in Massachusetts. There are no identified confirmed release sites in the proposed work area.

If oil/hazardous material contamination is encountered or a release occurs during construction activities, a Licensed Site Professional (LSP) should be retained to manage the contaminated media in compliance with the provisions of the MCP.

Spills Prevention

A spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from activities should be presented to workers at the site and enforced. The plan should include but not be limited to, refueling of machinery, storage of fuels, and accidental releases.

IV. Other Comments/Guidance

If you have any questions regarding this comment letter, please do not hesitate to contact Catherine Skiba at (413) 755-2119.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Michael Gorski
Regional Director

cc: MEPA File