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November 15, 2007

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

PROJECT NAME : Southbridge Environmental Industrial Park
PROJECT MUNICIPALITY : Southbridge
PROJECT WATERSHED: : Quinebaug River
EEA NUMBER : 10955
PROJECT PROPONENT : Southbridge Recycling & Disposal Park
(formerly Wood Recycling Inc.)
DATE NOTICED IN MONITOR : October 9, 2007

As Secretary of Environmental Affairs, I hereby determine that the Supplemental Environmental Impact Report (EIR) submitted on the above listed project **adequately and properly complies** with the Massachusetts Environmental Policy Act (G. L., c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00). No further MEPA review is required.

Project Description and Procedural History

The project change, described in the June 29, 2007 Notice of Project Change (NPC) and the Supplemental EIR, consists of a re-allocation of up to 224,640 tons per year (tpy) of solid waste from the construction and demolition (C&D) waste processing facility to the landfill within the Southbridge Environmental Industrial Park. The proponent proposes to increase the annual landfill tonnage limit to 405,600 tpy. The increase will consist of any combination of municipal solid waste (MSW) and C&D residues from the processing facility. The Supplemental EIR indicates that the maximum combined limit for the landfill and the processing facility will be 499,200 tpy. In addition, the project includes installation of an energy recovery facility at the landfill.

The original project, as described in the Final EIR, consisted of the development of 140 acres of a 402-acre tract of land located in and around the existing Southbridge Municipal Airport and Southbridge Municipal Landfill. The development consisted of expansion of the landfill, creation of a 1,101,000 square foot (sf)¹ industrial park (including a wood waste processing and manufacturing facility) and construction of associated infrastructure, including a new access road to connect Pleasant Street to Worcester Street (Route 169).

An Environmental Notification Form (ENF) for the project was filed in October, 1996. The December 23, 1996 Secretary's Certificate on the ENF required the filing of an EIR and designated the project as "Major and Complicated." In a separate Certificate issued the same day, a Special Review Procedure (SRP) was established. The SRP required that a separate ENF be filed for any further expansion of the Southbridge Municipal Airport. In accordance with the SRP, the July 31, 1998 Secretary's Certificate on the Draft EIR allowed Phase I of the project to proceed prior to completion of the Final EIR. Phase I consisted of the following elements: expansion of the landfill by 82 acres and an increase in its permitted capacity; construction of a 1,500 tpd (468,000 tpy) C&D processing facility; construction of a 350 tpd (109,305 tpy) wood fiber-manufacturing facility; and construction of 79,000 sf of manufacturing space (on 15 acres). Phase II consists of the full build-out of the industrial park and construction of the connection to Route 169.

A Final EIR was filed in January, 2000 for Phase II of the project. The February 18, 2000 Secretary's Certificate indicated that the Final EIR adequately and properly complied with MEPA and its implementing regulations. An NPC addressing a decrease in the size of the wood waste processing facility was filed on March 4, 2005 and deemed by the MEPA Office to be an insignificant project change.

The June 29, 2007 NPC described the proposed re-allocation of solid waste. Because the project change consists of a significant increase in the amount of MSW disposal (719 tpd), which was not contemplated during previous MEPA review, and a significant increase in air quality emissions, the August 10, 2007 Secretary's Certificate on the NPC required the proponent to file a Supplemental EIR.

Permits and Jurisdiction

The original project was reviewed prior to the 1998 revision of the MEPA regulations. It was subject to MEPA review and required the preparation of an EIR pursuant to 301 CMR Section 11.25 (1) and (30) because it required a state permit and consisted of a new non-residential construction project entailing the direct alteration of 50 or more acres of land and would increase landfill capacity by more than 300 tons per day (tpd). The project required a Sewer Connection Permit and a 401 Water Quality Certificate from the Department of Environmental Protection (MassDEP), and an Access Permit from the Massachusetts Highway Department (MassHighway). Also, the project required a National Pollutant Discharge Elimination System (NPDES) Stormwater Permit for construction activities.

¹ The Town was considering acquiring an additional 22 acres to expand the industrial park by 273,000 sf.

The project change requires a Comprehensive Plan Approval and an Amended Authorization to Operate from MassDEP. It may require a Sewer Connection Permit from MassDEP. It will require a Minor Site Assignment Modification from the Southbridge Board of Health. It may require a Title V Air Permit from the US Environmental Protection Agency (EPA).

Because the proponent is not seeking financial assistance from the Commonwealth for the project, MEPA jurisdiction is limited to those aspects of the project within the subject matter of required or potentially required state permits that may have significant environmental impacts. These include land alteration, solid waste, water quality, air quality, wastewater and traffic/transportation.

Review of the Supplemental EIR

The Supplemental EIR provides a status report on the overall project and previous mitigation commitments, including an overview of environmental management of the existing landfill. It provides more detail on the proposed changes and associated mitigation measures. It indicates that the active portion of the landfill (Phase 7) is being constructed in phases and is sited within the 32-acre footprint adjacent to Phases 1 through 6. It indicates that the new C&D processing facility is substantially complete. The proponent has completed the land acquisitions necessary for the construction of the access road and the project has been permitted. The proponent expects to put the access road out for bid in the Spring of 2008. Planning for the build-out of the industrial park, including the wood fiber manufacturing facility and cellulose-based manufacturing facility, is ongoing. The Supplemental EIR indicates that the Town does not intend to proceed with expansion of the airport.

The Supplemental EIR identifies changes in air emissions associated with the project change and evaluates these changes based on continued use of flaring and introduction of an energy recovery facility. The Supplemental EIR indicates that certain air pollutants, including Volatile Organic Compounds (VOCs), Nitrogen Oxides (NO_x), Particulate Matter (PM) and greenhouse gases will increase as MSW volumes grow and as the energy recovery facility is brought on-line. Sulfur dioxide (SO₂) emissions will decrease with the proposed change. The Supplemental EIR indicates that the landfill has the potential to become a major source of VOCs and NO_x, based on the Potential to Emit (PTE). The project change will require a Major Plan Approval from MassDEP. A Best Available Control Technology (BACT) analysis will be completed as part of the permitting process.

Emissions of landfill gases are currently minimized through the facility's landfill gas collection and destruction system, which includes a 20.6 MMBtu/hr open flare. This system will be improved, and greenhouse gas emissions associated with the project will be minimized further, with the introduction of two 9.07 MMBtu/hr landfill gas to energy generators. Energy created by these generators will be used to meet the landfill's electricity demands. It is estimated that each unit will produce 800 kilowatts (kw) of power and that it will displace 500 tpy of carbon dioxide (CO₂) equivalents at peak production. The proponent may add up to 6 additional generators to maximize the potential of this system.

The Supplemental EIR indicates that the project change will not result in an increase in traffic associated with the facility. It notes that the authorization limits identified previously, which were developed with the Town, were based on limiting truck trips to the facility. The Supplemental EIR indicates that all trucks servicing the facility must use the designated truck route.

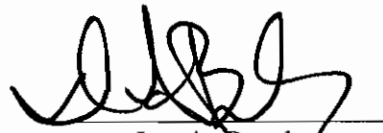
The Supplemental EIR includes updated draft Section 61 Findings. It indicates that the Town of Southbridge will provide project plans to the Army Corps of Engineers (ACOE) and the Massachusetts Historical Commission (MHC) for any proposed development that may affect the sites within and adjacent to Lot 4/5 and Lot 7/8 to ensure that any potential impacts to historic and/or archaeological sites are avoided. I note that the Section 61 Findings do not incorporate a commitment to install and operate the landfill gas to energy recovery facility. I encourage the proponent to revise these to incorporate a firm commitment to this facility (in Section 3. Impacts and Mitigation Measures) to mitigate the project's greenhouse gas emissions and I expect that MassDEP will consider including such a requirement during the permitting process.

Comments from MassDEP do not identify the need for additional information on either solid waste or air quality issues. Comments on the NPC provided by MassDEP identified potential and required air quality permits and expressed concern that the authorized capacity associated with the facility was not accurately reflected in the filing. It appears that the Supplemental EIR adequately addresses the issues identified by MassDEP.

Based on a review of the Supplemental EIR, consultation with state agencies and comment letters, I hereby determine that no further MEPA review is warranted. The project may proceed to permitting.

November 15, 2007

Date



Ian A. Bowles

Comments received:

11/7/07 Department of Environmental Protection/Central Regional Office
(MassDEP/CERO)
11/3/07 Cynthia B. Cooper

IAB/CDB/cdb