



Green Seal Environmental, Inc.

ENGINEERING | ENVIRONMENTAL | ENERGY SERVICES

114 State Road, Bldg. B, Sagamore Beach, MA 02562

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MA-SDO Certified D/WBE, D/MBE

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November 15, 2019

RE: Public Commenter Distribution Letter
Parallel Products of New England, LLC
100 Duchaine Boulevard, New Bedford, MA

NOTICE OF DRAFT ENVIRONMENTAL IMPACT REPORT SUBMISSION (EOEEA#15990)

To Whom It May Concern,

Please accept this letter as formal notification that a Draft Environmental Impact Report for the above referenced property has been filed with the Executive Office of Energy and Environmental Affairs (EOEEA) on November 15, 2019. You are receiving this notification as part of the circulation requirements set forth by EOEEA. A project fact sheet, summarizing the project, is attached for your information. A full copy of this DEIR, public meeting dates and/or updates to this project can accessed and downloaded at www.parallelproductssustainability.com. Also, a limited number of hard copies of the DEIR are available upon request, on a first come first served basis, by contacting the undersigned.

Notification of the filing of the DEIR will be published in MEPA's Environmental Monitor on November 22, 2019. Parallel Products of New England has requested an extended public review period and all comments are due by January 23, 2020.

All written comments should be sent to:
Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Comments can also be emailed to MEPA@mass.gov. Please reference this project with the designation EEA #15990.

Comments can also be submitted through the MEPA Public Comment Portal (available at <https://www.mass.gov/service-details/submitting-comments>)

Informational meeting(s) on the project as described in the DEIR will be held in early January. The date, time and location of the meeting(s) will be posted on the Parallel Products web site www.parallelproductssustainability.com as soon as the arrangements have been finalized.



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A Certificate on the DEIR will be issued by the Secretary of the EEA on January 30, 2020. The Certificate will contain a determination that either 1) the Draft EIR is adequate and include a scope of additional study and analysis for a Final Environmental Impact Report (FEIR), or 2) the Draft EIR is inadequate and include a scope of additional study and analysis for a supplemental Draft EIR.

Should you have any questions or comments, please do not hesitate to contact me at (508) 888-6034 (ex. 16). My e-mail address is greg@gseenv.com.

Sincerely,

GREEN SEAL ENVIRONMENTAL, INC.

Gregory C. Wirsen, MSc.
Executive Vice President



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Project Fact Sheet

Parallel Products of New England

100 Duchaine Boulevard, New Bedford

Parallel Products

Parallel Products has been a leader in the sustainability industry since 1979. Parallel Products looks for ways to deal with materials that businesses cannot sell because they have expired or because of manufacturing issues. Parallel Products accepts these materials and through processing and handling techniques maximizes the recovery of materials, ethanol production, and brand protection for unsaleable materials.

Parallel Products has purchased the 71 acre industrially zoned site within the New Bedford Business Park located at 100 Duchaine Boulevard. The site was formerly owned by Polaroid Corporation and used in the production of film. Parallel Products is proposing to further its recycling business with the construction of facilities that can recycle municipal solid waste (MSW) and biosolids.

Project Description

Parallel Products is currently moving its existing recycling operations from 969 Shawmut Avenue, New Bedford to the 100 Duchaine Boulevard site. The relocated operations will occupy existing unused buildings at the site. In addition, Parallel Products is proposing to further develop this site as a campus for recycling and for the production of green/renewable energy (e.g. solar).

The proposed site development will be constructed in two phases as defined below.

Phase 1-Construction of a Glass Recycling Facility

Phase 1 development consists of building a glass Beneficiation operation at the 100 Duchaine Boulevard site and the construction of approximately 1.9 MW of solar power energy generation. The Phase 1 operation will recycle glass containers that are collected through the Massachusetts bottle deposit system. A 27,500 square foot building is currently under construction to house the glass recycling equipment. Bottles collected will be processed such that the glass can be reused to produce new glass containers and other glass products. Processing at the site will include crushing, sizing and separation of the glass by color. The glass cullet produced will subsequently be sold to glass manufacturers for the production of new products including glass containers.

As a result of the limited options for recycling glass in Massachusetts and the greater distances needed to send processed glass to manufacturers, PPNE will construct a rail sidetrack from the existing rail line adjacent to the 100 Duchaine Boulevard site. This will allow shipment of recycled glass by rail that will significantly increase transportation efficiencies and reduce greenhouse gas emissions.

Phase 1 will include construction of 1.9 MW of solar power. Solar panels will be constructed on a canopy system that will be built over part of the proposed rail sidetrack, over existing parking areas, and on the building for glass storage. The proposed 1.9 MW solar power installation will be in addition to the existing 1.5 MW solar power already constructed and operational on site.

Phase 2-Construction of a MSW Processing Facility and a Biosolids Facility

Phase 2 of the project includes the construction of a municipal solid waste (MSW) and construction and demolition waste (C&D) processing/handling facility and a biosolids processing facility. Currently, significant quantities of MSW and biosolids are being trucked out of state for treatment and disposal. PPNE will construct a facility to collect and process this material in Massachusetts and then ship the residual waste out of state by rail for disposal. The infrastructure proposed will significantly increase transportation efficiencies and reduce greenhouse gas emissions.

A new 50,000 square foot MSW tipping/handling building will be constructed to accept MSW and to load residual MSW on to rail cars. The tipping building will be designed to allow waste delivery trucks to drive into the building to dump/tip their loads of waste material for subsequent processing/handling/transfer. After tipping, front end loaders will stage the material for subsequent processing/handling.

MSW received by the facility will be processed to extract recyclable materials. An existing building adjacent to the site of the proposed MSW tipping building will be used to house MSW processing equipment. Processing will consist of a processing line that includes both mechanized separation equipment and a manual picking line. Materials extracted, based on market conditions, will include metals, cardboard, aluminium, wood, glass, PET, paper and plastic. After the recyclable material has been extracted, the remaining waste will be baled and shrink wrapped for transport to a disposal facility. The primary means of transport for disposal will be by rail. Trucks can also be used to transport waste, if necessary. Recyclable materials extracted from MSW will be sent to recycling markets by either rail or truck depending upon market conditions and outlet locations.

The rail sidetrack will be expanded in Phase 2 to allow the site to accommodate the additional rail cars that will be required for removal of the non-recyclable portion of the MSW.

Phase 2 will include the construction of a biosolids drying facility. The facility will accept and process up to a maximum of 50 dry tons per day of biosolids. The biosolids will originate at various municipal wastewater treatment plants. The biosolids will be delivered to the facility by truck. The biosolids processing will be performed within a new building proposed to be constructed on site. The building is expected to be approximately 30,000 sf. The biosolids will be sent to a thermal dryer that utilizes a natural gas burner. The biosolids will be dried to approximately 90% solids reducing the volume and weight of the biosolids. The dried biosolids will be sent for disposal in rail cars or beneficially used for purposes such as alternative daily landfill cover.

Project Permitting and Public Input

Parallel Products of New England has filed an Expanded Environmental Notification Form (EENF) with the Executive Office of Energy and Environmental Affairs (EOEEA). After review of the EENF, the EOEEA determined that Phase 1 of the proposed project could proceed without further review by the EOEEA, but Phase 2 will require the submittal of a Draft Environmental Impact Report (DEIR) to be followed by a Final Environmental Impact Report (FEIR).

The following is a listing of the permitting activity still required for the project. Opportunity for public input for each permitting activity is noted.

Phase 1

Permit	Permit Issued By	Public Input Opportunities
Amended Site Plan Approval	New Bedford Planning Board	Public hearing
Order of Conditions	New Bedford Conservation Commission	Public hearing

Phase 2

Permit	Permit Issued By	Public Input Opportunities
Draft Env. Impact Report	EOEEA	30 day public comment period
Final Env. Impact Report	EOEEA	30 day comment period
Site Suitability Report	MassDEP	21 day comment period
Site Assignment	New Bedford Board of Health	21 day comment period and public hearing
Order of Conditions	New Bedford Conservation Commission	Public hearing
Amended Site Plan Approval	New Bedford Planning Board	Public Hearing
Authorization to Construct	MassDEP	30 day comment period
Authorization to Operate	MassDEP	21 day comment period

The Draft Environmental Impact Report is expected to be submitted to the EOEEA in mid-November. The schedule for the permits listed above is not defined at this time, as the permits required by MassDEP and the City cannot be submitted until the Final Environmental Impact Report has been accepted by the EOEEA. This date is not defined at this point in time. The permit status and schedule for public comment and schedule for public meetings will be posted on the Parallel Products web site as the dates become defined www.parallelproductssustainability.com.

All permit applications and permits issued will be available on the Parallel Products web site as soon as they are issued.

Traffic Impact Study

A Traffic Impact Study was conducted to evaluate the impact of the proposed facility on traffic in the project area. The proposed project will accept glass, municipal solid waste and biosolids delivered by truck. After processing the bulk of this material will be sent to out of state landfills for disposal. Outbound shipment of material will be primarily by rail.

To be conservative, the Traffic Impact Study assumed that all outbound shipments of waste material was by truck and that rail was unavailable. Deliveries to the site will utilize Route 140 to access the site. Trucks will exit Route 140 at exit 7 and take Braley Road/Theodore Rice Boulevard to Duchaine Boulevard. Parallel Products will ban trucks accessing the project site from using Phillips Road.

The proposed facility is expected to be serviced by 150 trucks entering and then exiting the site daily. In addition, facility employees are expected to result in 75 vehicles entering and then exiting the site daily. For comparison, vehicle counts on Duchaine Boulevard in June 2018 indicate an average of 4,150 vehicles utilize Duchaine Boulevard on a daily basis.

The Traffic Impact Study determined that the proposed project will not have any appreciable impact on the operations of the intersections or roadways in the project area.

Air Emissions Mitigation Design and Impacts Analysis

Parallel Products evaluated air emissions impacts for vehicle (trucks and employee cars) travel to and from the site, processing operations, road dust on-site, and use of front-end loaders for materials handling. The facility will be a minor source of air emissions. The key air pollutants were evaluated for the expanded environmental notification form (EENF) filing. A more comprehensive evaluation, including evaluation of additional air pollutants, was conducted as part of the draft environmental impact report (DEIR) filing.

The primary sources of air pollution during operation of the project will be combustion sources. Fuel combustion is the source of nitrogen oxides, carbon monoxide, sulfur dioxide, volatile

organic compounds, particulate matter, and formaldehyde. Specifically, the combustion sources are motor vehicles and front-end loaders fueled with diesel and gasoline, the natural gas fired biosolids dryers, and winter building heating that employs combustion of natural gas. There will be five front-end loaders at the site and all will use the latest and cleanest US Environmental Protection Agency (US EPA) regulated air pollution control technology (the technology standard is called Tier 4 Final) and the cleanest diesel fuel, called ultra-low sulfur diesel (ULSD). Exclusive use of Tier 4 engines goes above and beyond regulatory requirements. An electric rail car mover will also be used which has no emissions.

The MassDEP considers a stationary combustion source to be small, and not significant enough to regulate, if it has a maximum natural gas fueling rate of less than 10 million British thermal units per hour (MMBtu/hr). The heat input rating of the four sludge dryers is 5 MMBtu/hr each and building heating in the winter for both the glass handling and the biosolids buildings combined will be less than 5.5 MMBtu/hr. Therefore these are considered de minimis sources under current regulation/policy.

Air toxics emissions from the sludge drying process was also assessed. The sludge drying process is a limited source of the air toxics such as ammonia, hydrogen sulfide, carbonyl sulfide, and carbon disulfide. These air toxics will be emitted during heating of the sludge at a relatively low temperature under a vacuum. These air contaminants will be scrubbed out of and/or destroyed from the dryer exhaust gases using the best available control technology (BACT). Air modeling shows that air toxics impacts are below MassDEP acceptable ambient levels offsite.

Odor Mitigation Design and Impacts Analysis

Parallel Products refined the design for mitigation of odor impacts. Two different sources of odor are present at the site: municipal solid waste (MSW) and biosolids. All MSW and biosolids handling/processing operations will take place indoors and odor emissions will be dispersed by relatively tall stacks which were modeled to provide the necessary mitigation. In addition, significant reduction of odor will be accomplished using odor controls for the biosolids building exhausts. The project impacts are being designed for a criterion of 1 dilution to threshold on a 1-minute average period, which is significantly more stringent than the draft MassDEP criterion of 5 dilutions to threshold on a 15-minute average period. This should result in no detectable process odors offsite.

Noise Mitigation Design and Impacts Analysis

Potential noise from the project was evaluated for stationary equipment for the EENF filing. MassDEP policy allows a project's stationary sources to increase noise by up to 10 decibels (dBA) above background. The noise evaluation is being refined given minor project design changes, and the current draft indicates increases from the stationary sources of a maximum of 3

dBA during the daytime and 8 dBA during the nighttime. Thus, the project goes above and beyond the policy requirements. Parallel Products is using fan silencers, shielding of sources from the neighborhood by buildings and sound walls, and/or quieter equipment to achieve mitigation of noise.

Parallel Products also studied the sound impacts of on-site truck traffic and the results are included with the DEIR filing. The Federal Highway Administration (FHWA) criterion for residential neighborhoods is 66 dBA, and the project is projected to have a peak traffic sound level of 52 dBA. The Massachusetts Department of Transportation (MassDOT) significance threshold is 10 dBA incremental increase, and the project projected incremental increase is 3 dBA over existing. Thus, the project impacts are well below traffic noise criteria.

A Comparison to previous operations on Site

A previous site operation was a Polaroid film manufacturing facility that had much higher potential and actual emissions than proposed by Polaroid. Below is a comparison of the potential emissions from Parallel Products compared to Polaroid in 2003. The potential emissions from Parallel Products are orders of magnitude lower than Polaroid. The potential is also well below the actual emissions in 2003 and similar emissions were occurring from Polaroid and its successor Multilayer Coating Technologies until the facility closed around 2007.

Compound	Potential Emissions		Actual Emissions (2003)
	Parallel Products	Polaroid	Polaroid
Nitrogen oxides (NOx)	14	1290	77
Carbon monoxide (CO)	7	134	12
Particulate Matter (PM2.5)	0.9	11	38
Sulfur Dioxide (SO2)	0.1	1631	243
Volatile Organic Compounds (VOC)	<1	172	33