

December 18, 2019  
81 Longview Rd.  
New Bedford, Ma 02745-1918

Secretary Kathleen Theoharides,  
Executive Office of Energy and Environmental Affairs,  
Attn: MEPA Office EEA No. 15990, Parallel Products of New England  
100 Cambridge St. Suite 900  
Boston, Ma. 02114

Dear Regulating Agencies;

Please refer to my previous comment letter dated Dec 3, 2019. Because MEPA has excluded from the DEIR the necessary and required Site Suitability demonstration of 310CMR16 by waiver, the protections guaranteed the citizens of Massachusetts have been denied.

Specifically the proponent's description of the important issues have been excluded from public review, comment and analysis:

1. The incoming specifications of the waste materials are not described in detail. These assumed materials are the basis for computer modeling that allegedly meet environmental impact requirements.
2. The destination and the customers for the products that are produced from the handling and classification, of recycled Glass, Municipal Solid Waste and dried waste water sludge are not identified. The only information provided is that these product materials, which are significant in volume and toxicity, are transported off site possibly out of the State. Where?, To whom?, How if the present method of shipment is not in accord with rail requirements?
3. The proponent has no previous experience in constructing or operating a facility that receives sludge from waste water treatment plants and septage at any of their 5 other plants. The process description has a proposed layout and list of equipment that will be used. Further it is stated that Best Available Technology, BACT, will be employed in the operation to dry the material. Have PP of NE, LLC sought or included results of an independent expert able to testify to the probability that the chosen technology Meets BACT. Since drying sludge from waste water treatment facilities is the most noxious activity that is proposed, it should receive the most scrutiny. The proponents lack of experience as well as the industry experience of companies like Synagro in handling, drying, transporting and land application of this material have failed to protect the communities from the negative issues that have resulted. Will our community also suffer from these unintended but likely consequences?
4. The security of financial assurance which requires the proponent to protect the city of New Bedford from costly liabilities by default, should the construction or operation of the facility be terminated or abandoned or by a bankrupt operator, has not been demonstrated. In addition this assurance must include set aside funds that will be available to immediately correct community nuisances from operation of the facility that may appear during the course of any activity on the site should it become licensed to operate.

5. Site appropriate distances to residences, schools, hospitals, water wells, rivers, wetlands have not been demonstrated. Many residences are closer than the 500' setback stipulated from the property boundary of the proposed facility. Plans the proponent submitted do show the mandatory 100' artificial setback from the property boundary proposed limit of activity on the site. However once operation begins, no enforcement or operating limitations will be imposed if this make-believe barrier is breached which could result from backed up truck deliveries, spillage or lack of storage prior to export of dried sludge. Uncovered dried sludge quickly becomes noxious that would affect many of the several hundred homes within one half mile of the facility. Further more operation of the facility is planned for 24hr/day in order to achieve production goals. Even if sufficient spare capacity is designed into every component in the handling, receiving, storage and discharge to export; unplanned interruptions will occur that may expose the workers and the community to the odors associated with exposed sewage sludge. The proposed location for a sewage sludge drying facility is just wrong and does not meet the site appropriate distances.

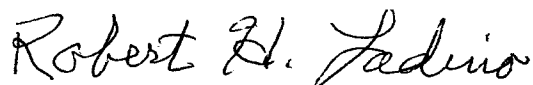
6. For all the above reasons and uncertainties that the facility will meet the environmental requirements, neither the proponent nor the regulating agencies have given the community assurances in the licensing requirements that this regional glass cull handling, Municipal Solid Waste transfer and waste water sludge treatment facility will not become a significant nuisance if operation is allowed to proceed.

MEPA has the authority to vigorously pursue the answers that will be developed in the Site Suitability demonstration that has been omitted in the DEIR documents it has issued. It should be abundantly clear that without that demonstration, licensing this facility is premature and does not meet the intent of the Law which protects the citizens from the poor choices nuisance industries make for their facilities.

The approval of the DEIR should not be given, and an immediate stop ordered for the previously approved Phase 1 construction of the glass handling facility and associated railroad spur track, pending demonstration of the Site Suitability requirements, followed by a public hearing, allowing all interested parties to intervene.

Parallel Products of N.E. have had access to the regulating agencies to date, and the public directly affected have not, except through written comments. It is time to bring this licensing process into the public arena with all parties present, and at a location that is convenient for the community that is asked to host a nuisance industry.

Thank you for considering the necessity of the issues I have raised.



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