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Carbon Fertilizer Manufacturing Facility
Moreau Industrial Park

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Site Plan Application Supplemental Information
for
SEQRA Negative Declaration

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Town of Moreau, New York
Town Planning Board Meeting
March 7, 2022

Replicating Nature

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Carbon plays a fundamental role in natural cycles where it is naturally produced.

What we are all about

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Environmentally beneficial resource recovery

Green Infrastructure that displaces dirty industry

Carbon Fertilizer

We are “essential”

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We provide an “essential service”

We provide an “essential commodity”

We provide an “essential GHG reduction”

Outline

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- **Supplemental Site Plan Submittal - Feb. 23, 2022**
  1. Basic Application Content
  2. Revisit the SBS Manufacturing Process
  3. The SEQR Assessment
  4. Staff Notes from July 2021
  5. Questions to NYSDEC from Jan. 12, 2022, Meeting
  6. Conclusions
  7. Next Steps

1. Basic Application Content

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- **Site Plan Application Checklist.**
  - Added references to text and/or drawings for each item.
- **Full Environmental Assessment Form (EAF) Part 1.**
  - Updated wastewater discharge.
    - ✓ Office, truck wash, and air treatment.
  - Updated air emissions.
    - ✓ CO_2 and hazardous air pollutants.
- **Stormwater Pollution Prevention Plan.**
  - Revised per Laberge Group Review Letter (12/8/2021).
- **Landscaping and Lighting Plan.**
  - Landscaping Plan Included on Sheet L-6.10.
  - Lighting Plan included on Sheet L-7.10.

Basic Application Content (cont'd)

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- **Architectural Drawings.**
  - Updated to show emission stack locations.
- **Sewer Connection.**
  - Connection location shown on Sheet L-3.10.
  - Acceptance letter from City of Glens Falls included.
- **Water Connection.**
  - Connection Locations shown on Sheet L-3.10.
  - Town Sewer / Water Department Flow Testing in-progress.
- **Driveway Connection.**
  - Connection Location shown on Sheet L-1.10.
  - Town Highway Superintendent conducting Final Review.

2. Revisit the SBS Manufacturing Process

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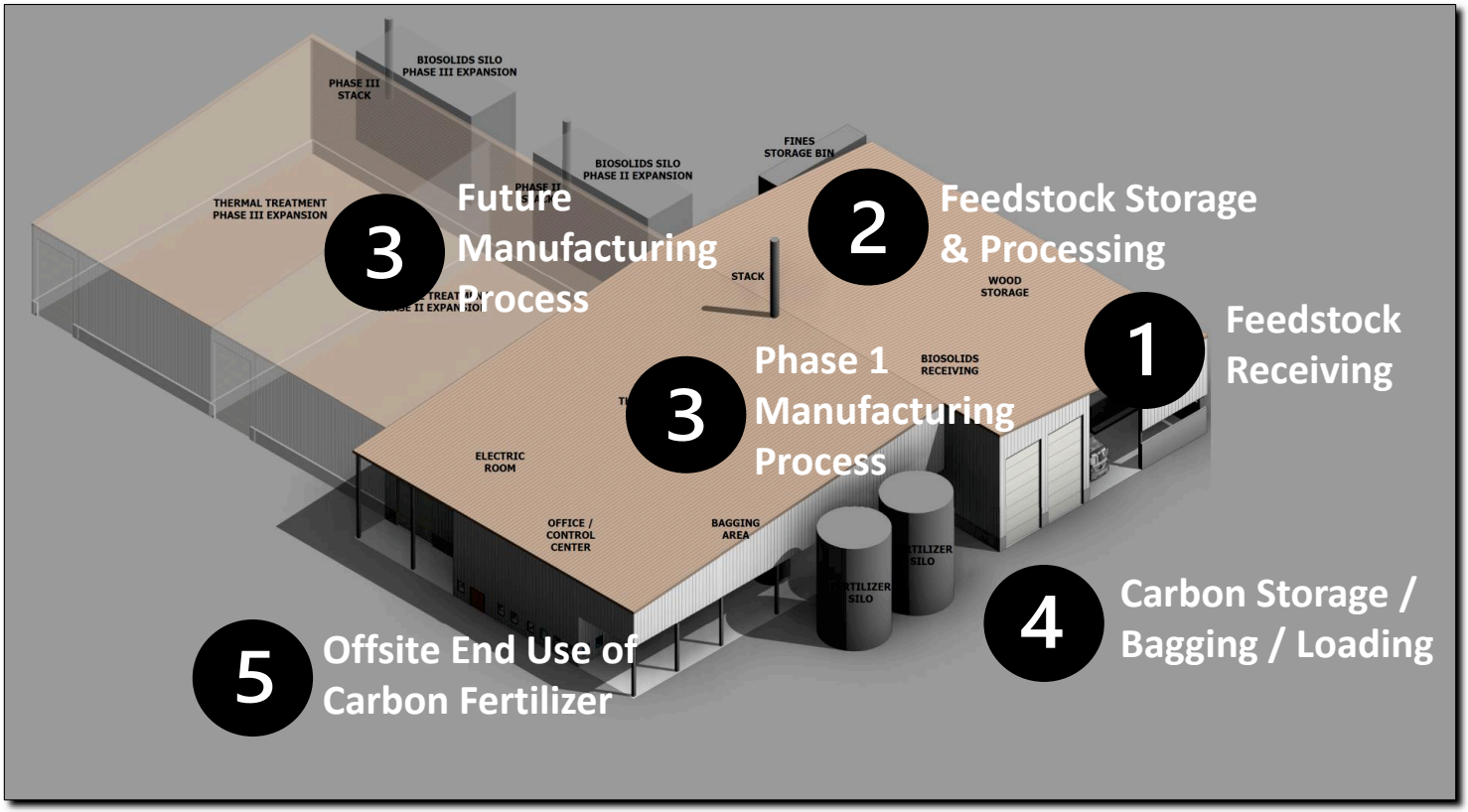

Facility Process Flowchart

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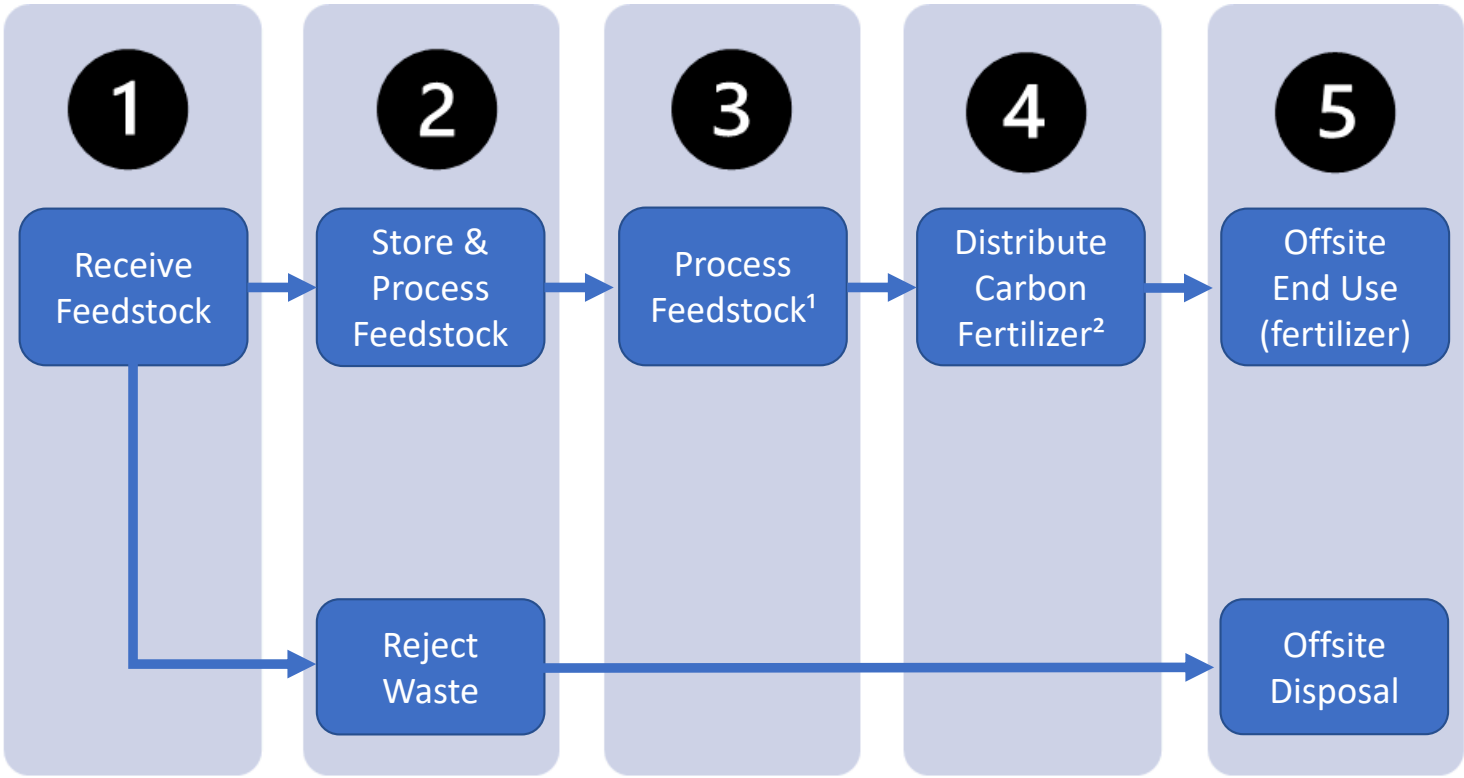

[1] Drying, pyrolysis, air treatment, sewer discharge.

[2] Storage, bagging, loading.

SBS Manufacturing Process

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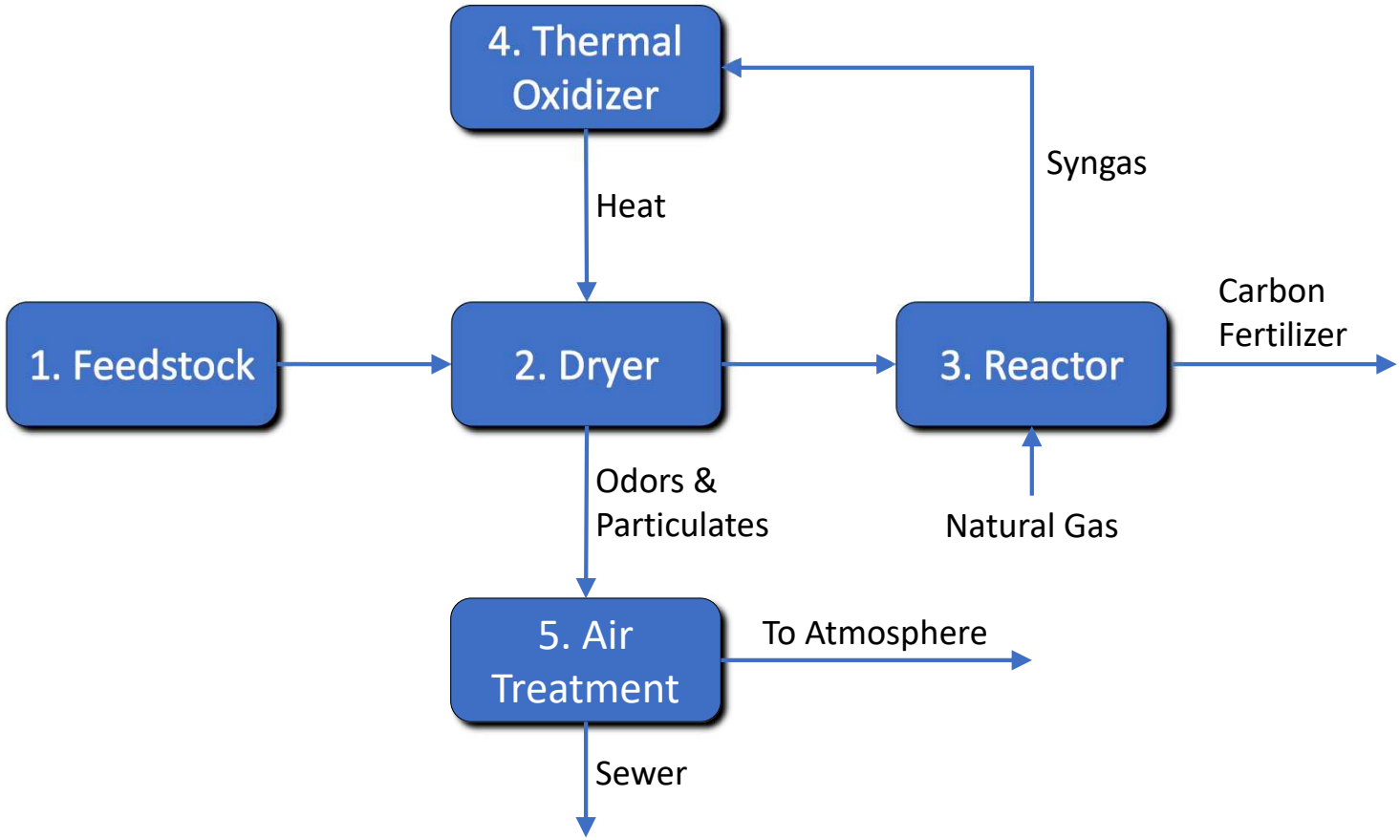

3. The SEQR Assessment

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- **Moderate to Large Potential Impacts Mitigation.**
  - Permits: Approved facility design/ operation requirements.
  - Question 6 a. i., c., d., and e.: Impact on Air.
    - ✓ CO_2 and NOx emissions mitigation: NYSDEC Air Permit.
    - ✓ Dust and Odors mitigation: facility design and permits.
  - Question 15c. Impact on Noise, Odor, and Light.
    - ✓ Odor mitigation: facility design and permits.
  - Question 16. Impact on Human Health (none to small).
    - ✓ Facility prohibited from receiving hazardous materials.
- **Permit Compliance.**
  - Stack testing, recordkeeping, and reporting to NYSDEC.

4. Staff Notes from July 2021

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- **Feedstock composition approved in Solid Waste permit.**
  - Stability confirmed by regular testing.
  - Hazardous waste not authorized.
- **Safe transportation and handling of feedstock ensured.**
  - Single, reputable, NYSDEC waste transporter-permitted supplier.
  - Established, approved local truck transportation route.
- **Safe facility O&M/ sulfuric acid storage and handling.**
  - Ensured through compliance with NYSDEC bulk storage program.
  - Approved personnel training program and contingency plans.
- **Air Emissions Specifications.**
  - Type, direction, magnitude approved in Air Permit.
  - Stack locations and heights - Appendix A: Sheets A100 & 201.

Staff Notes from July 2021 – continued

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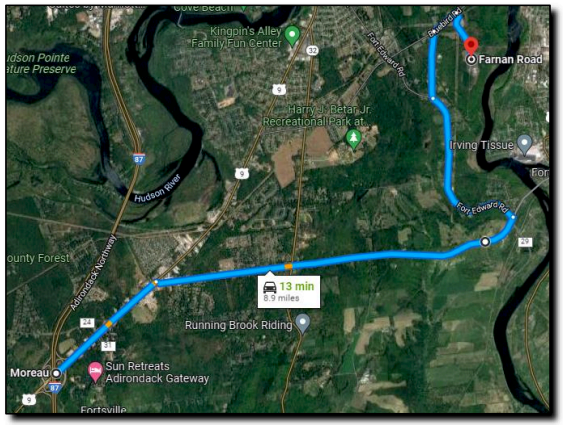
- **Traffic Type, Frequency, and Route.**
  - Truck traffic limited: 6:00 AM - 6:00 PM Monday – Saturday.
  - Up to 50 trucks per day. Less than GEIS screening threshold.
  - Standard over-the-road dump trailers with tight fitting tarps.
  - Follow established town truck route:
    1. I87 Exit 17N to Route 9 North.
    2. Route 197 (Reynolds Road) East.
    3. Fort Edward Road North.
    4. Bluebird Road East.
    5. Arrive at Moreau Industrial Park.



5. Questions to NYSDEC from 1/12/22 mtg.

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- **CO_2 Emissions Threshold: Preliminary Screening Limit.**
  - Limits approved; potential impacts mitigated by Air Permit.
- **Complaint Notification.**
  - Add Town approval condition for copies of NYSDEC notifications.
- **Permit Renewal Notification.**
  - Applications publicly posted to the Environmental News Bulletin.
- **Future Processing Increase.**
  - Any increase is a permit modification subject to DEC review.
- **No similar facilities in NYS.**
  - Facility implements well known processes and equipment.
  - Potential impacts mitigated through NYSDEC permits.
  - Permit conditions ensure safe operations, public, environment.
- **Offsite Vegetation for Noise Mitigation.**
  - Noise assessment revised to eliminate offsite vegetation effects.
  - Conservation easement exists; preserves some buffer.

6. Conclusions

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- **Site Plan supports SEQR negative declaration.**
  - Identifies mitigations included in the project (for EAF Part 3).
    - ✓ Air and Odor mitigated: facility design, permit conditions.
    - ✓ Hazardous wastes not received or processed at the facility.
    - ✓ Mitigation compliance ensured by NYSDEC oversight.
  - Potential impacts (EAF Part 2) are not significant (for Part 3).

7. Next Steps

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- **Next Step: Moreau TPB to complete EAF Part 3.**
  - Determination of Significance.
  - Required for NYSDEC to complete its permitting process.
- **Next Step: Moreau TPB to approve Site Plan.**
  - Approval contingent upon receiving all other approvals.
    - ✓ *Common and recommended*.
    - ✓ NYSDEC permits/registration:
      - Air, Solid Waste, Chemical Bulk Storage.
    - ✓ Other Agencies, e.g., Water/Sewer, Highway, WWTP, etc.

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