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January 13, 2022

Mr. Eugene R. Zamojcin, Environmental Analyst II
New York State Department of Environmental Conservation
Division of Environmental Permits, Region 1
SUNY @Stony Brook
50 Circle Road
Stony Brook, NY 11790

Re: Peconic Environmental Services Property
100 Peconic Avenue, Medford, NY
Application #1-4722-07052/00001
SCTM #200-736-2-8.3
H2M Project No. GSRC1901

Dear Mr. Zamojcin:

In accordance with our Webex meeting with DEC staff on Thursday, January 7, 2022, we offer a revised Facility Manual dated January 2022; revisions to the Facility Manual are italicized for ease of review, along with the following responses:

1. *Comment 2: The facility proposes to accept C&D waste and it still states in the Facility Manual that recyclables will be separated from the waste stream. Part 361-5 applies to facilities that process and/or store construction and demolition (C&D) debris to extract recyclable or reusable materials. As such Part 361-5 is applicable.*

Response: A revised Application Form has been furnished in Appendix E. Our application now seeks to operate a C&D Debris Handling & Recovery Facility in accordance with Part 361-5. The Facility Manual has been revised to provide additional details on C&D unloading, sorting recyclables and storing recyclables (Page 7). A new drawing furnished in Appendix A, Figure 3 - Site Plan has been added to depict material handling areas. The Part 360 sub-parts have been checked.

2. *Comment 3: The required design parameters for rail car movement depicting rail cars being brought into and out of the building for loading and disposal purposes shall be shown on site plan.*

Response: In order to provide additional railroad track information, a new drawing has been developed for DEC consideration. Please refer to the following:

- Appendix A, Figure 4 - C&D Tracks Track Schematic, dated 1/7/2022, prepared by Saratoga Railroad Engineering, PC
- Additional rail car details have been provided in the Facility Manual:
 - Facility Manual, Section B, Item No. ii, Paragraph No. 2 Rail Operations, page 5.
 - Facility Manual, Section B, Item No. ii, Paragraph No. 3 Rail Track Infrastructure page 6.
 - Facility Manual, Section B, Item No. iii, Paragraph No. b Railcar Loading, page 8.
 - Facility Manual, Section B, Item No. iii, Paragraph No. b, Rail Car Sequencing, page 8.

3. *Comment 9a: Details on the number of trucks that can unload simultaneously inside the building without obstructing traffic flow still needs to be provided.*

Response: Appendix A, Figure 6 – On Site Traffic Flow Plan has been revised to depict all four (4) traffic flow paths into the facility. A new drawing, Appendix A, Figure 7 - Tipping Movements has been prepared and depicts four (4) roll off trucks dumping within the building and three (3) staging on the south side of the building. Both 20 cy and 40 cy roll off trucks are approximately 34 ft. long and 8 ft. wide. Please refer to the following: which depicts the truck turning movements while at the facility:

- Appendix A, Figure 6 - On Site Traffic Flow Plan
- Appendix A, Figure 7 - Tipping Movements

4. *Comment 9c: Based on operation and compliance history of other similar rail transload facilities, DEC staff find that the correlation between throughput and the number of railcars available on-site is one of the most important factors that limit the throughput of a facility. Our experience and review of similar operations has shown that the number of railcars available on-site must be able to handle at least 1.5 times the daily throughput. The submitted application indicates that the site only has capacity to store 25 railcars which is insufficient for the proposed throughput of 1,938 tons per day (tpd). Please provide clarification and additional details.*

Response: The Peconic Environmental Services site's proposed permit capacity is 1,938 tons. 150% of this value is 2,907 tons. Additional details have been added to provide clarification, please refer to Facility Manual, Page 5, Item No. 2 Rail Operations for the added details.

5. *Comment 9d: Details on the total number of railcars in the fleet still needs to be provided.*

Response: The rail car fleet servicing Peconic Environmental Services consists of approximately 1,000 rail cars. Gondola railcars are readily available for use by Peconic Environmental Services. The railcar providers will include Tunnel Hill Landfill, NS and CSX. In addition, the Facility Owner has approximately 170 railcars under his control.

During the 1/7/22 meeting the owner indicated that additional railcars would be purchased and or leased if required once all permitting is secured and the facility ready to become operational.

6. *Comment 12: Please include the dimensions of the C&D pile used when calculating for a building full of waste. The Department generally requires the calculations to be based on a stockpile of at least 2/3's of the building's height.*

Response: The closure estimate has been revised to include a full building of waste, stacked two thirds of the building height high. The dimensions of the pile indicated in the closure cost estimate are:

Disposal Fee of full building of waste - assume waste is occupying entire tip, processing floor and is piled 2/3 of building height with 1 on 1 side slopes. (Base = 139' wide x 235 long, Top = 44' x 135', Height is 45'). Delivered waste density is 3.75 CY/ton



7. *The location where truck queuing and staging will occur on-site must be shown and labeled on the site plan.*

Response: Please refer to the following, which depicts the truck turning movements while at the facility:

- Appendix A, Figure 6 - On Site Traffic Flow Plan
- Appendix A, Figure 7 - Tipping Movements

8. *The Facility Manual states "All tipping, storage, loading, and related activities shall be conducted in the enclosed building with adequate odor controls to effectively control off-site nuisances. Non-putrescible waste may be stored in outdoor areas if it is stored in closed containers or covered trailers." Please depict the onsite location where these containers would be stored. In addition, the location of waste stored outside needs to be shown on the site plan.*

Response: this item was not discussed

9. *Where will unauthorized waste be stored? This needs to be shown on the site plan.*

Response: this item was not discussed

10. *The Town of Brookhaven recommended curb radii at the site entrance on Peconic Ave be increased to 30ft to accommodate the large trucks that are expected to frequent the facility. Will this comment be implemented and reflected on the site plan?*

Response: Modifications will be made to the site plan to address all Town of Brookhaven comments in this regard.
In accordance with the DEC request, please refer to:

- Appendix E, Town of Brookhaven - SEQRA Negative Declaration, dated February 25, 2021

Should questions arise during your review of the materials outlined above, please do not hesitate to contact this office, either by phone at 631.756.8000, ext. 1447, or by e-mail at jcline@h2m.com. We thank you for your time and assistance in this matter.

Very truly yours,

H2M architects + engineers

Joseph F.
Cline, P.E.

Digitally signed by Joseph F. Cline,
P.E.
DN: cn=Joseph F. Cline, P.E., o=H2M,
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Joseph F. Cline, P.E.
Practice Leader

Enclosures

- Facility Manual, revised January 2022

CC: Kevin Gershowitz, w/enclosures