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NYSDEC REGION 1
ENVIRONMENTAL PERMITS

October 11, 2021

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 your Notice of Incomplete Application, dated July 2, 2021, we offer the following response:

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: The Facility Manual has been revised to address this comment. Please refer to Page 11 of the Facility Manual for information on compliance with 361-5.

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 outline railcar movements, a new drawing has been developed for DEC consideration. Please refer to the following engineering drawing in the Facility Manual - Appendix A:

- Rail Plan, dated September 1, 2021, by Barrett, Bonacci & Van Weele, PC

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: The 235' long by 47' wide (11,045 ft²) tipping area can accommodate four (4) 20 cy trucks unloading simultaneously; or three (3) 40 cy trucks unloading simultaneously. Please refer to the following engineering drawing in Facility Manual Appendix A which depicts the truck turning movements while at the facility:

- C-1 On Site Traffic Flow Plan

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 the Facility Manual to provide clarification. Please refer to Page 5, 2. RAIL OPERATIONS for the added details.

By utilizing a combination of (15) 52' and (13) 65' long gondola railcars, the facility will be able to manage 150% of the permitted daily tonnage requested by the NYSDEC. The required length of track to store a minimum of (28) railcars is 1,737 linear feet. The Peconic Environmental facility has 1,834 linear feet of track storage available. Please refer to the following engineering drawing in the Facility Manual Appendix A:

- Rail Plan

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.

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 pile dimensions of waste on the tipping floor used to calculate the storage capacity are depicted in the following drawing in the Facility Manual Appendix A:

- Figure 1 – C&D Storage Plan

The transfer station can safely store (2) 100'x77'x30' high piles with 1 on 1 side slopes. Each of the two (2) resulting pile volumes is 4,003 cy. A 25' wide pathway for loading railcars shall remain in the center of the two (2) piles. The proposed transfer station building height is 67'. Our proposed pile height of 30' is below the 2/3 value ($2/3 \times 67' = 44.9'$) suggested.

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

Response: A new plan has been added to the application. Please refer to the following engineering drawing in the Facility Manual Appendix A for details on truck queuing and staging:

- C-1: On Site Traffic Flow plan

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: The only planned outside storage of non-putrescible waste is in railcars. All railcars loaded with C&D will be stored on tracks and covered with a rail tariff compliant tarp. The location of stored railcars can be found on the following drawing in Appendix A:

- Rail Plan

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

Response: Unauthorized waste, once identified, will be stored in the southeast corner of the transfer station tipping floor. This location is depicted on the following plan in the Facility Manual Appendix A:

- C-1 One Site Traffic Flow Plan, see 12'x12' hatched area in SE corner

Unauthorized waste shall be segregated, secured, and contained in this storage zone in order to prevent leakage or contamination of the environment. It shall be removed within seven (7) days after receipt. Transportation shall be performed by a company authorized to transport the waste. Disposition shall be to a facility authorized to receive the waste. In unauthorized waste incident will be recorded with the following form contained in the Facility Manual Appendix D:

- Unauthorized Waste Form

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.

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 jjcline@h2m.com. We thank you for your time and assistance in this matter.

Very truly yours,

H2M architects + engineers

Joseph F. Cline, P.E.
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Date: 2021.10.11 16:47:35 -04'00'

Joseph F. Cline, P.E.
Practice Leader

Enclosures (3)

1. Facility Manual, revised September 2021
2. Facility Manual – Appendices
3. Engineering Report, revised September 2021

CC: Kevin Gershowitz, w/enclosures

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