Civil & Environmental Engineering, Landscape Architecture and Land Surveying, PLLC

DUNN MINE AND C&D FACILITY PERMIT RENEWAL AND MSE BERM MODIFICATION FULL ENVIRONMENTAL ASSESSMENT FORM

Prepared For:

S.A. DUNN LANDFILL & COMPANY, LLC 209 PARTITION STREET EXTENSION RENSSELAER, NEW YORK 12144

Prepared By:

CIVIL & ENVIRONMENTAL ENGINEERING, LANDSCAPE ARCHITECTURE AND LAND SURVEYING, PLLC 31 BELLOWS ROAD RAYNHAM, MASSACHUSETTS 02767

CEE Project 182-442

JANUARY 2022

TABLE OF CONTENTS

1.0	PROJECT BACKGROUND		
	1.1	Project Description	1
	1.2	Part 360 Solid Waste Management Plan Regulations	3
	1.3	Mined Land Use Regulations	3
	1.4	Traffic	4
	1.5	Noise	4
	1.6	Cultural Resources	4
	1.7	Stormwater	4
	1.8	Groundwater	5
	1.9	Wetlands	5
	1.10	Visual Resources	5
	1.11	Odor	5
	1.12	Air Quality	6
	1.13	Summary	6

FIGURES

Figure 1 – Revised C&D Disposal Area
Figure 2 – MSE Berm Disturbed Area
Figure 3 – Site Vicinity Plan

APPENDICES

- Appendix A Full Environmental Assessment Form
- Appendix B Additional Narrative Information
- Appendix C EAF Mapper Summary Report
- Appendix D Supporting Referenced Documents
- Appendix E Visual Resource Assessment Report
- Appendix F Current Mitigation of Offsite Impacts

1.0 PROJECT BACKGROUND

1.1 PROJECT DESCRIPTION

The Dunn Mine and Construction & Demolition Debris (C&D) facility is located in Rensselaer and North Greenbush, New York. It is owned and operated by S.A. Dunn & Company, LLC (S.A. Dunn). The facility is currently permitted to operate under a permit initially issued by the New York State Department of Environmental Conservation (NYSDEC) on July 20, 2012, and renewed on September 9, 2016, with a stated expiration date of July 20, 2022 (Permit DEC #4-3899-00006/00006). Civil & Environmental Engineers, Landscape Architects, and Land Surveyors, PLLC, (CEE) has prepared this Full Environmental Assessment Form (EAF, Appendix A) for the facility's permit renewal application and for the proposed modification to construct a mechanically stabilized earthen (MSE) berm on the northern and eastern boundary of the site.

The current permit encompasses both the mining and C&D disposal activities at the site. Initial permitting for the landfill site was prepared by C.T. Male Associates, P.C. and included a Draft Environmental Impact Statement accepted by NYSDEC on January 9, 2012, a Final Environmental Impact Statement dated May 2012, and a solid waste permit application, including engineering drawings, dated October 2010, last revised December 2011. Subsequent to receiving approval for construction of the facility, the construction-phasing plan as presented in the initial permit application was revised and a minor modification was prepared by Sanborn, Head and Associates in May 2014. NYSDEC approved the permit revisions, and construction of the site began in late summer 2014. The first phase of construction was approved by NYSDEC in early 2015, and waste placement activities began in January of 2015. Subsequently, Civil & Environmental Engineering, Landscape Architecture and Land Surveying, PLCC (CEE) prepared a permit modification to revise the landfill construction sequencing that was approved in September 2015. In 2016 the facility applied for a modification that included increasing the facility footprint area to include additional mining and waste disposal area of approximately 4.8 acres in the southwestern area of the site. This modification resulted in an additional land disturbance area of approximately 3.9 acres. In October 2019, a NYSDEC initiated permit was issued pertaining to daily cover, install an enhanced active gas collection system, and establish and maintain an odor complaint reporting system. A Full Environmental Assessment Form was prepared by CEE to address the additional area of land disturbance, along with a Part 360 Permit Application, and Mining Permit Modification. In August 2021, S.A. Dunn submitted a Mined Land Permit Reclamation Permit renewal application which will be processed with its Part 360 Solid Waste Management Facility renewal application.

-1-

In connection with the permit renewal and as required under the June 2019 Consent Order (R4-2019-0409-24) entered between S.A. Dunn and NYSDEC, the facility is seeking approval to construct a MSE berm on the northerly and easterly side of the site(MSE Berm), which will result in a reduction of the overall waste disposal footprint. The proposed revision will decrease the total waste footprint by 1.2 acres and will not increase the maximum permitted elevation of the site above the maximum permitted elevation. The proposed berm will also increase the setback distance from the northern property line. The elevation of the current permitted northern perimeter berm is at approximately the same elevation as existing grade, whereas the proposed MSE Berm will be approximately 40 to 60 feet above existing grade, resulting in visual screening of the landfill operations from the surrounding properties. There will be no increase in the permitted airspace and if fact, the proposed modification results in an airspace reduction of approximately 220,000 cubic yards.

There are no proposed changes to the waste acceptance rate, or other permitted mining or C&D disposal operational conditions.

Unless otherwise indicated, this EAF therefore applies only to construction of the MSE Berm. The area of the proposed berm is 5.2 acres, which includes the geogrid embedment length, the top width of 50 feet, including the swale, access road, and planting area (where applicable), the side slopes of the proposed berm, as well as the stormwater management swale at the toe of the berm and the North Infiltration Basin. Although the North Infiltration Basis has already been approved and permitted, it will be built during MSE Berm construction and has therefore been included in the project area acreage, as shown on Figure 2. The berm area is located within the area addressed by the original 2012 FEIS. A permit application form is included in Appendix A.

The original permitted facility, which encompassed approximately 68 acres, was previously reviewed under the State Environmental Quality Act (SEQR) in 2012 and subsequently reviewed under SEQR in 2016 to incorporate an additional 4.8 acres of mining and waste disposal area. It is expected that this project will not result in additional impacts beyond those contemplated with the permit application. The original Final Scope associated with the original DEIS in 2012 for the facility included:

- Part 360 Solid Waste Management Plan Regulations
- Mined Land Use Regulations
- Traffic
- Noise
- Cultural Resources
- Stormwater
- Groundwater
- Wetlands
- Visual Resources
- Odor
- Air Quality

These items were also reviewed during SEQR review of the full EAF prepared for the footprint modification in 2016. A discussion of each of these items is provided in the following sections. As noted below, the proposed project will continue to be designed, constructed, and operated in accordance with the existing permits such that the project will not result in additional adverse impacts.

1.2 PART 360 SOLID WASTE MANAGEMENT PLAN REGULATIONS

The facility has been and will continue to be designed, constructed, and operated in accordance with 6 NYCRR Part 360 regulations. A Part 360 permit application for the additional footprint area has been submitted for approval that included an Engineering Report and Plans, an Operations and Maintenance Plan, Technical Specifications, and a Construction Quality Assurance/Quality Control Manual that document how the design, construction, and operations of the facility modification will maintain compliance with Part 360 regulations.

1.3 MINED LAND USE REGULATIONS

A mining modification permit application has been submitted to incorporate the proposed MSE Berm construction in the Mining Reclamation Plan. Otherwise the sand and gravel mine operations will continue in accordance with the existing Mined Land Reclamation Permit.

-3-

1.4 TRAFFIC

A traffic study was prepared and submitted with the 2012 FEIS for the facility, and traffic impacts from the facility were previously reviewed under SEQR. Based upon this review, the current permit conditions for the facility allow for generation of up to 100 truck trips (round trip) per day. There are no proposed changes to this condition; therefore, there will not be additional adverse impacts associated with traffic. No increase in truck traffic would be permitted to accommodate construction of the MSE Berm.

1.5 NOISE

The noise impacts from the facility were previously reviewed under SEQR. The currently existing operations at the site will continue as currently permitted and reviewed, including the same usage of the same type of equipment for construction of the MSE Berm, which should generate similar levels of noise. These activities would take place within the previously approved facility footprint. Therefore, the proposed project is not expected to result in an increase in noise.

1.6 CULTURAL RESOURCES

A cultural study was prepared and submitted with the 2012 FEIS for the facility, which included the MSE Berm area, and cultural impacts from the facility were previously reviewed under SEQR. The potential for impact of this project to have an effect on potentially significant cultural resources has been evaluated by Columbia Heritage, LTD, who determined that the potential for impact is low. MSE Berm construction will take place within the permitted facility footprint. The approximate area that will be under construction has been already disturbed by historical mining operations, which date back more than 100 years.

1.7 STORMWATER

The proposed stormwater management system for the facility was previously reviewed under SEQR. There will be no increase to the peak discharge off-site. The facility currently operates and will continue to operate in accordance with a site specific Stormwater Pollution Prevention Plan (SWPPP), which has been updated to include the proposed MSE Berm, in accordance with NYSDEC State Pollution Discharge Elimination System (SPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-17-001). The SWPPP will be reviewed and updated at the frequencies specified by the permit, as well as when there are

-4-

significant changes to the stormwater management system. The proposed stormwater management system is fully described in the Part 360 permit application and revisions will be made to the SWPPP to incorporate additional discharge points as they are constructed.

1.8 GROUNDWATER

The facility was previously subject to SEQR review and the proposed MSE Berm will not affect the permitted conditions regarding groundwater management as this application includes a reduction in overall waste disposal footprint.

1.9 WETLANDS

The facility was previously reviewed under SEQR in 2012 and there are no changes in impacts to wetlands associated with the proposed modification. A wetland delineation was done on the project site by the U.S Army Corps of Engineers and it was determined that four (4) small wetlands and four (4) streams located at the southern portion of the site. The proposed MSE Berm is not located within the southern area where wetland areas were delineated.

1.10 VISUAL RESOURCES

The visual impacts of the facility were previously reviewed under SEQR. The proposed MSE Berm will not result in an increase in the peak elevation of the landfill. The proposed MSE Berm will be higher in elevation than the currently permitted berm, which will result in improved visual screening of the daily operations of the landfill from the adjacent school property and other surrounding properties as compared to the current permitted conditions. A Visual Resource Assessment Report was prepared by Saratoga Associates and is included as Appendix E. The report concludes that the proposed MSE Berm will not cause a diminishment of the public enjoyment and appreciation of any scenic or historic resource, or one that impairs the character or quality of such a place.

1.11 **ODOR**

The odor impacts associated with the facility were previously reviewed under SEQR. The proposed MSE Berm will not result in an increase of odor on the site.

-5-

1.12 AIR QUALITY

The air quality impacts of the facility were previously reviewed under SEQR. The proposed project will continue to be operated in accordance with best management practices to control the potential for impacts to air quality. Since the operations will remain the same, there will not be an increase in adverse impacts to air quality.

1.13 SUMMARY

As noted above, the facility was previously reviewed under SEQR. There are no proposed changes to mining and C&D disposal operations, and thus no additional adverse impacts, associated with the permit renewal and modification beyond those already contemplated during the initial review. The MSE Berm will improve visual screening at the northern end of the property and otherwise is also not expected to generate additional adverse impacts. The facility will continue to operate in accordance with current protocols to reduce the potential for nuisances.

The completed EAF form for the permit renewal and proposed MSE Berm modification is attached in Appendix A, and additional discussion supporting the EAF has been provided in Appendix B. Additional reference information is presented in Appendices C through E. Detailed information regarding the current measures S.A. Dunn is currently implementing to mitigate off-site impacts, as well as recent sampling and monitoring results from NYSDEC and other parties, is included in Appendix F. These measures will continue to be followed. Visual reference information is illustrated in Figures 1 through 3.

FIGURES

- Figure 1 Revised C&D Disposal Area
- Figure 2 MSEh Berm Disturbed Area
- Figure 3 Site Vicinity Plan



EXISTING MAJOR CONTOUR EXISTING FENCE EXISTING PAVED ROAD EXISTING UNPAVED ROAD EXISTING TREE LINE EXISTING PROPERTY LINE EXISTING ADJACENT PROPERTY LINE PERMITTED LANDFILL PERIMETER LIMIT EXISTING LANDFILL PHASE LIMIT PROPOSED LANDFILL PERIMETER LIMIT PROPOSED LANDFILL PHASE LIMIT PROPOSED REDUCTION IN C&D DISPOSAL FOOTPRINT AREA $(\pm 1.2 \text{ ACRES})$

REFERENCE NOTES:

- EXISTING TOPOGRAPHY WAS COMPILED BY SOUTHERN RESOURCES MAPPING CORPORATION USING PHOTOGRAMMETRIC METHODS FROM PHOTOGRAPHY DATED MARCH 16, 2021, AND SUPPLEMENTED WITH TOPOGRAPHY FROM OCTOBER 10, 2020 AND NOVEMBER 4, 2020. SURVEY CONTROL DATA WAS PROVIDED BY WASTE CONNECTIONS, INC.
- 2. PROPERTY LINE INFORMATION WAS TAKEN FROM A PLAN TITLED "ATLA/ASCM LAND TITLE BOUNDARY SURVEY, LANDS OF KELLY AND DUNN TO BE CONVEYED TO S.A. DUNN & COMPANY, LLC," PREPARED AND SEALED BY WILLIAM N. CURRAN, AND UPDATED AS NECESSARY BASED ON AVAILABLE TITLE INFORMATION.



DRAWN BY:	TLG	CHECKED BY:	
DATE:	JANUARY 2022	DWG SCALE:	1":

ļ	EGEND			
		EXISTING MAJOR CONTOUR		
	XXX	EXISTING FENCE		
		EXISTING PAVED ROAD		
		EXISTING UNPAVED ROAD		X X X X X X X X X X X X X X X X X X X
		EXISTING TREE LINE	. /11/ (?	
		EXISTING PROPERTY LINE		
AM		EXISTING ADJACENT PROPERTY LINE		
9.05		PERMITTED LANDFILL PERIMETER LIMIT		
/202		EXISTING LIMIT OF GRADING		C. T. C. T.
1/12,		EXISTING LANDFILL PHASE LIMIT		
ė.		PROPOSED LIMIT OF GRADING		
<i>.</i> –		PROPOSED LANDFILL PERIMETER LIMIT		
garan		PROPOSED LANDFILL PHASE LIMIT		
-	·/////////////////////////////////////	PROPOSED LIMIT OF ADDITIONAL		
/202		DISTURBED AREA (0.27± ACRES)	EXISTING LEACHATE TANK	
(1/13	·/////////////////////////////////////	PROPOSED LIMIT OF REDUCTION	EXISTING SCALES	
:S7 FS:		IN DISTURBED AREA (0.931 ACRES)		Selfan II VIII Palle
URE 2				121111111111111111111111111111111111111
g{FlG		, 5		
ure.dw		, X	EXISTING	16.280-
d Fig			Scale House	
sturbe Z	<u>OTE:</u>			
ة لا ¹	NET DISTURBED AREA IS	REDUCED BY APPROXIMATELY		
rth M.	0.00 AURES.		EXISTING	PARTITION STREET EXTENSION
§_ <u>R</u> -∼	EFERENCE NOTES:		FACILITY ENTRANCE	(AKA DUNN HILL ROAD)
anne J	. EXISTING TOPOGRAPHY W. RESOURCES MAPPING CO	AS COMPILED BY SOUTHERN		
AF-FI	PHOTOGRAMMETRIC METHO MARCH 16, 2021, AND S	ODS FROM PHOTOGRAPHY DATED SUPPLEMENTED WITH TOPOGRAPHY		
116-E	FROM OCTOBER 10, 202 SURVEY CONTROL DATA V	0 AND NOVEMBER 4, 2020. WAS PROVIDED BY WASTE	CIVIL & ENVIRONMENTAL ENGINEERING	
12-SN	CONNECTIONS, INC.		PERMIT FIGURE, DATED MARCH 2016)	
1824	. PROPERTY LINE INFORMA	TION WAS TAKEN FROM A PLAN		
ures	OF KELLY AND DUNN TO	BE CONVEYED TO S.A. DUNN &		
F Fig	CUMPANY, LLC, PREPARI CURRAN, AND UPDATED	ED AND SEALED BY WILLIAM N. AS NECESSARY BASED ON		
16-EA	AVAILABLE TITLE INFORMA	ATION.		
S/SW:	. THE EXISTING LIMIT OF C FIGURE TITLED "ADDITION	GRADING WAS TAKEN FROM A AL DISTURBED AREA" PREPARED		
ma/a	BY CIVIL & ENVIRONMEN ARCHITECTURE AND LAND	TAL ENGINEERING, LANDSCAPE) SURVEYING PLLC, DATED MARCH,		Civil & Environmental Engineering
-CAC	2016.	· · ·		Landscape Architecture and Land Surveying, Pl
-442				31 Bellows Road
182-				Raynham, MA 02767
2018				DRAWN BY: TLG CHECKED BY:
á				DATE: JANUARY 2022 DWG SCALE: 1":

12/2022 \sim



LEGEND:



2. ZONING/LANDUSE, AND WELL INFORMATION WERE TAKEN FROM NEW YORK GIS DATABASE.

3. THERE ARE NO PUBLIC/PRIVATE WELLS WITHIN 1-MILE OF THE PROPOSED AREA OF MODIFICATION.



DRAWN BY:	KFH	CHECKED BY:	
DATE:	MAY 2021	DWG SCALE:	1"=

NOTES:

RECREATION & ENTERTAINMENT ZONE WILD, FORESTED, CONSERVATION LAND ZONE PUBLIC/PRIVATE WATER SUPPLY WELL (SEE NOTE 3)