
PARALLEL PRODUCTS OF NEW ENGLAND, INC.

Massachusetts Environmental Policy Act
Expanded Environmental Notification Form

Supplemental Submittal

Site Location:

100 Duchaine Boulevard
New Bedford, Massachusetts 02745

March 2019

Prepared For:

Parallel Products of New England, Inc.
100 Duchaine Boulevard
New Bedford, Massachusetts 02745

Green Seal Environmental, Inc.

114 State Road, Building B, Sagamore Beach, MA 02562 | Tel: (508) 888-6034 | Fax: (508) 888-1506 | www.gseenv.com

Leading the Industry with Innovative Environmental, Engineering and Energy Solutions Since 1997.

The following supplemental submittal to the Expanded Environmental Notification Form (EENF) has been prepared at the request of the MEPA office to provide additional detail on the proposed project relative to the requested Phase 1 waiver. The MEPA office requested that each of the criteria that must be addressed in a waiver request as detailed in 301 CMR 11.11 (1) and (4) be expanded upon in greater detail and that the impacts of the Phase 1, taken alone, be evaluated. There are no changes to the project scope as defined/outlined in the EENF submittal.

Parallel Products of New England (PPNE) is requesting a Phase 1 waiver to allow construction of:

1. Glass processing facility
2. Canopy style photovoltaic solar power facility
3. Rail sidetrack from existing rail line to the proposed glass processing facility

As discussed in the EENF, the proposed Phase 1 project does not trigger any of the MEPA review thresholds defined in 301 CMR 11.03.

Page 2 of the EENF contains a Summary of Project Size & Environmental Impacts. This table summarizes the combined impacts of Phase 1 and Phase 2. The following table breaks down the impacts by phases (for the items that are impacted by either Phase 1 or Phase 2).

Description	Existing	Phase 1 Change	Phase 2 Change	Total Change
Land				
Total site acreage	71	0	0	0
New acres of land altered		4.6	4.2	8.8
Acres of impervious area	16	0.5	3.0	19.5
SF of new BVW altered		4,087	349	4,436
SF of new other wetland alteration		350	0	350
Structures (excludes solar canopy)				
Gross square footage	95,916	27,500	200,390	323,806
Maximum height		30	45	
Transportation				
Vehicle trips per day	76	220	272	498
Parking spaces	468	0	-60	-60
Wastewater				
Water use (gpd)	150	150	12,850	13,150
Wastewater generation (gpd)	150	150	82,825	83,125

As noted in the above table the environmental impacts of Phase 1 are significantly less in Phase 1 than in Phase 2 with the exception of impacts to wetlands and new acres of land altered. These

impacts are largely due to construction of the rail sidetrack. Although this track will be used for both Phase 1 and Phase 2, the track will be largely constructed in Phase 1.

As indicated on the site plans included in Appendix A of the EENF, the project development area is separated from the existing rail line by a large wetland area that extends from the north property line to the south property line. The variations on rail alignment are limited by the design restrictions (radius of curves, slope, etc) associated with rail development. The design of the rail sidetrack has been designed to minimize the impacts to wetlands to the extent possible. The design features that were included in the design to minimize impacts to wetlands include:

1. At the proposed rail crossing of the drainage swale, the track is perpendicular to the swale at the crossing to minimize the area of wetlands and riverfront impacted.
2. To the extent possible, the rail alignment follows an existing right of way access road and traverses an area of existing disturbed soils.
3. The rail crosses the wetlands at the location to minimize area impacted. The crossing location passes through an isolated area of uplands within the wetland area to minimize wetland area impacted.
4. Within the wetland areas, the rail will be located between two retaining walls to minimize the impacts to wetlands (retaining wall eliminates the need for sloping embankments from rail elevation down to existing grade). The distance between the two retaining walls will be the minimum distance allowed by the railroad.

The rail crossing of the drainage swale will be constructed by placing a box culvert in the drainage swale. The rail crossing of the bordering vegetative wetland will be constructed on fill placed between two retaining walls. Both of these design features will result in permanent impacts to wetlands. PPNE will file a Notice of Intent (NOI) with MassDEP and the New Bedford Conservation Commission prior to construction of the rail line. This NOI will include plans for wetlands replication per the requirements of 310 CMR 10.55 (4) and with any applicable rules and regulations of the New Bedford Conservation Commission. Work within the 25 foot riverfront area has been minimized to the extent feasible by selecting an alignment that minimizes the size of the riverfront area impacted.

301 CMR 11.11 (1) Standards for All Waivers

The Secretary may waive any provision or requirement in 301 CMR 11.00 not specifically required by MEPA and may impose appropriate and relevant conditions or restrictions, provided that the Secretary finds that strict compliance with the provision or requirement would:

- a) *result in an undue hardship for the Proponent, unless based on delay in compliance by the Proponent;*

Parallel Products of New England (PPNE) has processed/recycled glass bottles collected through the State's bottle deposit program since 2004. The glass that is collected by PPNE is processed by a series of stages that include crushing, screening and separation by color prior to being sent to bottle manufacturers to create new bottles. Historically, the processed glass was sent to the Ardagh Group Glass Plant in Milford, MA. The Ardagh Plant closed in March 2018, which have left the Commonwealth with limited solution for handing this type of glass.

The Ardagh Plant was the only glass bottle production facility in New England. Currently, glass is being trucked to bottle production plants over great distances, including plants in Texas and Georgia. As a result of increased shipping distances and a nationwide trucking shortage, PPNE has not been able to provide sufficient outbound shipments of glass to match the inbound shipments. As a result, glass has been accumulating on site. The new glass processing facility and a new rail sidetrack is a necessary development for the Commonwealth to ensure recycling of glass bottles versus disposal and/or lower value usages such as fill. A Phase 1 waiver for this construction is clearly a hardship for PPNE and without its development is highly detrimental to Massachusetts recycling initiatives under the Solid Waste Master Plan. Without a Phase 1 waiver, it is likely that some glass products may need to be sent for disposal due to the difficulties in shipments to recycling outlets. Not granting a Phase 1 waiver is both a hardship to PPNE and clearly a detriment to recycling efforts for glass bottles.

Aside from PPNE's recycling initiatives, they have been developing photovoltaic solar power at 100 Duchaine Boulevard for 2016 years and currently have 1.5 MW on line. The proposed 1.9 MW increase in solar capacity is a project that was in development prior to the start of planning for the current site development plans. Permitting, design and interconnection agreements have all been in the development stages prior to the start of permitting for the facility subject to MEPA review. It is a hardship to PPNE to stop project development of the solar expansion until the MEPA review has been completed. It should be noted that under the current SMART program it is imperative that the project proceed forward soon so that this facility can be placed into the queue and increase the goal towards carbon neutrality.

b) not serve to avoid or minimize Damage to the Environment

Not granting a Phase 1 waiver will not avoid or minimize damage to the environment. The Phase 1 plan to increase on-site solar power and to add glass processing on-site have minimal impacts to the environment as these facilities are to be constructed in areas of disturbed land and on lands that are largely impervious due to existing paved areas and the previously constructed and currently abandoned structures.

Construction of the rail sidetrack will have wetlands impacts that will require filing of a Notice of Intent and the project will require wetlands replication. The rail sidetrack will be constructed to service both the Phase 1 project and the Phase 2 project. Wetlands impacts are identical if only Phase 1 was constructed, if only Phase 2 was constructed, or if both Phase 1 and Phase 2 were constructed.

The Phase 1 project will reduce greenhouse gas emissions. The Phase 1 project includes the construction of additional solar power and the construction of a rail sidetrack for the transport of glass to out of state recycling facilities. As discussed in Appendix C of the EENF, the solar installation at the site results in a 1,649 ton per year reduction in CO₂. Greenhouse gas emissions associated with moving a ton of by-product by rail are far less than moving the same amount by diesel truck.

301 CMR 11.11 (4) Determinations for Phase One Waiver

- a) *the potential environmental impacts of phase one, taken alone, are insignificant;*

This is addressed in item b) above.

- b) *ample and unconstrained infrastructure facilities and services exist to support phase one;*

The project is a redevelopment of an existing industrial site. At 71 acres in size, the site is more than adequate for the proposed development. The existing site includes the infrastructure necessary to support the proposed site. The existing site includes all required access roads, is serviced by municipal water and sewer, and has the necessary electric supply.

- c) *the Project is severable, such that phase one does not require the implementation of any other future phase of the Project or restrict the means by which potential environmental impacts from any other phase of the Project may be avoided, minimized or mitigated;*

The Phase 1 project is independent of Phase 2. The Phase 1 project will proceed even if the Phase 2 project does not. The Phase 1 project does not trigger any MEPA review thresholds.

The proposed solar project is a continuation of the development of solar power at the site. The solar development is unrelated to the proposed Phase 2 project. Prior to initiation of the proposed project, PPNE has installed 1.5 MW of solar power at the site. Phase 1 of the proposed project includes construction of an additional 1.9 MW of solar power. Construction of the proposed solar expansion is planned for an area of the site that is currently impervious due to its location developed on a canopy structure above existing paved areas and above concrete slabs associated with historical building construction by

the former site owners. Environmental impacts associated with the solar expansion are minimal. Construction of this solar expansion does not have any impact on the construction or environmental impacts of the proposed Phase 2 construction.

Phase 1 is being developed to meet an immediate need for recycling glass in the commonwealth and without it, less recycling will occur due to the distance to outlets. The glass processing will be performed within an enclosed building. The building and outdoor storage bunkers will be located on an existing impervious concrete slab which is a remnant of a building that was demolished by the former owners of the site. The glass processing facilities have been located such that this facility has no impact on the siting or environmental impacts of the Phase 2 development.

Construction of the rail sidetrack is an essential component of the glass processing facility. The distances required to recycle glass make the inclusion of rail transportation a necessity. Glass processing will be performed within an enclosed building. The processing building will be located on an existing impervious surface (a concrete slab which remains from a building which was demolished after Polaroid vacated the site).

The rail line constructed for transport of glass to recycling markets will be expanded in the Phase 2 development to provide for the outbound shipment of MSW and dried biosolids. The proposed rail sidetrack will have an impact on wetlands. The existing rail line to the west of the site is separated from the project area by wetlands. The proposed rail line must cross through wetlands to service the site.

The rail layout has been selected to minimize the impacts to wetlands. The rail line has been oriented to be perpendicular to the drainage swale at the point of the crossing to minimize the size of the wetland area impacted by construction. The rail alignment has been selected to minimize the area of wetland impacts.

All impacts to wetlands as a result of the construction of the rail sidetrack will occur during Phase 1 of the project. Expansion of the sidetrack for Phase 2 will consist of constructing additional track to service the MSW and Biosolids processing facilities. The Phase 2 expansion will largely be limited to existing impervious surfaces and will not have any wetlands impacts.

- d) *the Agency Action on phase one will contain terms such as a condition or restriction in a Permit, contract or other relevant document approving or allowing the Agency Action, or other evidence satisfactory to the Secretary, so as to ensure due compliance with MEPA and 301 CMR 11.00 prior to Commencement of any other phase of the Project.*

The Phase 1 project does not trigger any MEPA review thresholds.