

April 8, 2016

Mr. Dean Bennett
Director of Community and Economic Development
Town of Hampden
106 Western Avenue
Hampden, Maine 04444

Re: MRC/Fiberight Response to Review Comments

Dear Dean:

We have reviewed the letter provided by Woodard and Curran based on their preliminary review of the Site Plan Application that we've submitted on behalf of the Municipal Review Committee (MRC) and Fiberight, LLC. Based on our discussions with you, we thought that it may be helpful to provide some additional information in response to some of the technical items noted in the Woodard and Curran letter prior to the Planning Board meeting on April 13th as part of MRC/Fiberight's Application. Eaton Peabody will be providing a separate letter addressing the applicability of the Subdivision Ordinance.

Regarding Article 4.1.7.2 and 4.1.7.6, building elevations have not been prepared at this time and the ordinance does not indicate that they are required. The proposed processing portion of the building will be a metal building typical of what would be found in an industrial park setting. The administration portion of the building will most likely be a wood frame structure. There are no existing buildings in the vicinity, but the proposed building would integrate well with other industrial type buildings, which matches the zoning of the property.

Regarding Article 4.1.7.9, stormwater management, we have submitted a Stormwater Permit application to Maine Department of Environmental Protection (MDEP) that addresses the stormwater along the access road. The MDEP Solid Waste Permit application addresses stormwater management for the facility development. It is our understanding that the review of these portions of the permits has been completed and all MDEP comments have been addressed. If the MDEP permits have not been issued by the time that the Planning Board is prepared to make a determination on this project, we would suggest that the MDEP permit approvals be a condition of the Town approval.

Regarding Articles 4.1.7.13, 4.2.3.4, and 4.4.1 air emissions and odor standards, we offer the following response to letters a-f in the review letter:

- (a) There are no locally operated facilities, similar in process, that are provided with odor controls comparable to those being proposed for the Fiberight facility. The facility most similar in operations is the Fiberight facility in Lawrenceville, Virginia. To date, there have been no odor complaints at the Virginia facility.

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- (b) In order to address the MDEP requirement for the prevention of nuisance odors at occupied buildings, the revised DRAFT Operations and Maintenance Plan (O&M) manual submitted to MDEP on March 30, 2016, includes revisions to the Odor Management Section. The updated O&M manual includes provisions for regular site inspection and odor survey with the purpose of identifying sources of potential odors. The inspection and odor survey will include the waste receiving areas, truck queuing area, and truck maneuvering areas. The applicant will be submitting the results of these inspections and odor surveys to the MDEP on a weekly basis. Section F.3 of the revised O&M manual states the following in regard to the inspection intervals:

During the first month of, and for a total of 6 months during, the first year of operation a daily inspection and odor survey will be conducted around the facility. The daily inspection period must include the summer months when waste odors are expected to be strongest. If operations commence in the winter months and no odor issues are identified during the first month, inspections will be reduced to weekly until warmer weather. If after 6 months, including summer months, no odor issues are identified, inspections will be permanently reduced to weekly.

- (c) As specified in Section F.2 of the Revised O&M manual, queued waste trucks that exhibit strong odors will be prioritized for offloading to minimize the time the truck is waiting to unload. Trucks containing waste that is typically more odorous may be scheduled for receipt to minimize the time the truck is in queue. Following off-loading onto the tipping floor, trucks will be allowed to drain remaining leachate to the maximum extent practicable inside the building. This practice will minimize the potential for leaks or drips from trucks outside the building or on public roadways. The drained leachate is collected in the trench drain system and reintroduced into the pulping process. In addition to the operational and mechanical controls that are proposed, the Applicant will maintain sufficient odor neutralizing agents for application as necessary. The neutralizing agent will be available in both spray and solid form.

The Applicant will have no legal control over the routes that waste haulers use to transport waste from the source to the Applicant's facility. Based on input from the Town of Hampden, the Applicant can request that waste haulers avoid certain roadways or intersections but will have no enforcement capability. In accordance with Chapter 411 of the Solid Waste Rules, waste haulers must be licensed in order to transport waste within the State of Maine. Waste haulers must comply Chapter 411, Section 5(C) which states "All waste must be properly contained during transportation to prevent any leaking, spilling, blowing or any other type of discharge to the environment. No conveyance shall be loaded beyond its legal capacities." Trucks and haulers that do not comply with this regulation will be warned by Fibright that waste will not be accepted if the hauler continues to be out of compliance with the MDEP licensing General Conditions.

Fibright and MRC chose the proposed site, in part, based on its location in respect to separation from occupied buildings. The nearest occupied residence is located at a distance of approximately 3500' and is buffered by a generally forested area. Seasonal prevailing wind directions were evaluated based on 5 years of meteorological data collected at the Bangor

International Airport (BIA). Given the proximity of BIA to the proposed site, and the similarities in topography, this data should be representative of the prevailing wind directions at the proposed site. During the spring and summer months when the potential for nuisance odors to exist is generally higher, the prevailing wind direction is to the north. This direction is away from the closest residences. During the autumn and winter months when the potential for nuisance odor generation is the lowest, the prevailing wind direction is to the southeast. Neither of the conditions will convey potential nuisance odors in the direction of the nearest occupied buildings.

- (d) Section F.5 of the revised O&M manual addresses the process for handling odor complaints. Fiberight will provide trained staff to receive complaints from the public 24 hours per day, 7 days per week. The Town of Hampden will be supplied with this contact information. In the event that complaints are received by Town of Hampden, they can be forwarded to the Applicant. The following is the Basic Process for Odor Complaint Response:
1. When an odor complaint call is received, Fiberight staff shall obtain the necessary information from the caller to fill out an Odor Complaint Response Form (Form). This information includes: the caller's name and address; date and time of the complaint; and whether the caller would like someone to visit them at the location of the complaint, either on-site or as a result of truck traffic, to verify the odor. A copy of the Odor Complaint Response Form is attached.
 2. The Form will be completed by the staff member answering the phone and the information relayed to the appropriately trained response staff for follow-up action.
 3. If a visit is requested, the appropriate staff member should note the conditions observed during the visit. At a minimum, the following should be noted; wind direction, distance from the facility, and odor noted.
 4. If a visit is not requested, or upon return from a visit, staff should perform an inspection of the facility to check for obvious sources of potential odor. Upon completion of the inspection, the appropriate corrective measures should be taken.
 5. The Fiberight staff member who is addressing the complaint shall notify Fiberight's Operations Manager within four hours of the complaint and notify MRC (as the landlord and owner of the property) and MDEP (as the regulatory agency) of the complaint immediately.
 6. If MDEP determines that the facility created an off-site odor nuisance, Fiberight will submit a written report to the Department detailing the cause of the nuisance odor, follow-up actions taken, as well as plans for future treatment, minimization, and control of nuisance odors. This report will be submitted within 30 days.
- (e) There are no anticipated odor issues associated with the operation of the flare or boiler. The flare and thermal oxidizer are the control mechanism for tail gas and potential bypass gas. There are no anticipated odor issues anticipated from the combustion of gas. The fuel source for the boilers, post-hydrolysis solids, similar to the flare gas, is not expected to generate odors during combustion or storage.

(f) Section B.1(2) Operations addresses the control of dust on roadways as follows:

2. A paved road provides access to the facility. If necessary during dry periods, the access ways may need to be wetted to control excessive dust generation resulting from facility activities. The access road will be kept free of excessive dirt and debris by sweeping or other methods, to ensure a clear travel way. All proposed roadways will be paved, so there should not be any dust issues from the access road or the site upon construction completion.

Section B.9 Routine Maintenance and General Cleanliness and Section B.12 Litter Control. As discussed in the response to Item 4(c), "All waste must be properly contained during transportation to prevent any leaking, spilling, blowing, or any other type of discharge to the environment", this will limit potential litter issues on the roads leading to the site. Trucks will be required to keep their loads covered until they reach the scale house. Regular inspections, daily, and weekly will be conducted around the facility and any litter will be noted and removed at that time. If it becomes evident that litter is becoming problematic, staff will review waste handling protocol to determine the likely cause and the appropriate change will be made, as practicable.

Regarding traffic, based on our discussions with you, we are examining the haul routes of current MRC towns that could potentially travel within Hampden (e.g., Route 1A), on their way to the proposed facility. Based on the historical tonnage from these towns, we will estimate the expected number of trips per day/week from this region. We will be prepared to discuss this in more detail at the Planning Board meeting next week.

Please let us know if you have any questions or need additional information. We look forward to discussing these items in more detail with the town and Planning Board next week.

Sincerely,
CES, Inc.



Sean Thies, P.E.
Senior Project Manager

SMT/jok
Enc.

Cc: Greg Louder, MRC
Jon Pottle, EP

ODOR COMPLAINT REPORT

Top portion of this form is to be filled out at the time of the complaint.

Date: _____

Time: _____

Name of caller: _____

Contact information for the caller:

Location of complaint:

Does the caller wish to have the odor verified? (y/n)

Bottom portion of this form is to be filled out by the responder.

Was a visit to the caller conducted? (y/n)

Distance of the complaint from the facility: _____

Was an odor noted? (y/n)

Was the caller's location downwind of the facility? (y/n)

Is there anything unusual happening at the facility? (Shutdown, maintenance, etc.?) (y/n)

Any unusually odorous waste loads delivered? (y/n)

Was a follow-up inspection conducted at the facility? (y/n)

List any items identified during the inspection that require attention.

What steps were taken to correct any issues identified?

