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December 15, 2025

BY ELECTRONIC AND FIRST-CLASS MAIL

Lauren Antonelli, M.A.
Director of Public & Community Health
Hudson Health Department
Town of Hudson
78 Main Street
Hudson, MA 01749
lantonelli@townofhudson.org

Re: Request for Minor Modification to Site Assignment, 1 Municipal Drive, Hudson, MA

Dear Ms. Antonelli:

On behalf of B-P Trucking, Inc. and the Hudson Department of Public Works, enclosed please find a Request for Minor Modification to Site Assignment for 1 Municipal Drive, which is also referred to as 300 Cox Street.

I have included four (4) hard copies of the Request for you and the three members of the Hudson Board of Health.

Best regards,

Peter F. Durning

cc: *via electronic mail*
Eric Ryder, Director of Public Works, (eryder@townofhudson.org)
Stephen DePaolo (Stephen.DePaolo@bptrucking.com)
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B-P Trucking, Inc. and Hudson Department of Public Works

Request for Minor Modification to Site Assignment

1 Municipal Drive, Hudson, Massachusetts 01749

December 15, 2025

Introduction

The Town of Hudson, owner of a 72 acre parcel of property at 1 Municipal Drive, which is also referred to as 300 Cox Street (the "Property"), acting through its Department of Public Works ("DPW"), and B-P Trucking, Inc., the operator of the existing transfer station ("B-P" and together with the DPW, the "Proponents"), request a minor modification to the existing solid waste site assignment for the Property issued by the Hudson Board of Health in January 1986 (the "1986 Site Assignment") to authorize the acceptance of up to 850 tons per day ("TPD") of solid waste. A copy of the 1986 Site Assignment is attached as **Exhibit A**.

Executive Summary

In instances where an existing site assignment does not state a capacity or a total volume limit on TPD but the Massachusetts Department of Environmental Protection ("MassDEP") permit contains such a limit, the Site Assignment Regulations for Solid Waste Facilities at 310 CMR 16.00 provide a mechanism whereby a proposed increase in the MassDEP-approved TPD requires a minor modification to the site assignment to provide a review process at the local board of health.

Given that the Property is already site assigned and this request is only seeking a modification to increase the TPD, as provided in 310 CMR 16.22(3), the approval process for this minor modification does not require the filing of a site suitability application to MassDEP or issuance of a site suitability report by MassDEP.

The regulations require the Board of Health to conduct a hearing in accordance with the public notice and public hearing requirements referenced in 310 CMR 16.22(3). The regulations also provide that the Board shall grant the minor modification to the site assignment unless the Board finds that the requested increase in TPD would present a danger to public health, safety, or the environment pursuant to G.L. c. 111, § 150A.

Description of "minor modification"

The following is an excerpt from 310 CMR 16.22 that describes "minor modifications to a site assignment that is relevant for this request:

(3) Minor Modifications to Site Assignments at the Request of the Facility Owner or Operator. *Any request to modify a site assignment that is not subject to 310 CMR 16.22(1) or (2), including any request to modify*

conditions established by the Board of Health in the site assignment, or to increase daily or annual tonnage limits, except as specified at 310 CMR 16.22(4), are deemed to be "Minor Modifications." The Board of Health may modify a site assignment to address a minor modification, at the request of the facility owner or operator, without requiring the filing of a new application by the applicant or site suitability report by the Department, provided the Board of Health provides public notice and holds a public hearing in accordance with the requirements of 310 CMR 16.00 prior to deciding on the minor modification.

Site Location

The Property currently includes the existing solid waste transfer station, as well as other municipal facilities such as the Hudson Fire Department, Hudson Wastewater Treatment Facility, and combined Hudson Police Department and Public Works Facility.

The existing transfer station was constructed in 1988 and began operating in 1996. Since 1999, the transfer station has been operated by B-P.

Prompted by the 2017 construction of the Hudson Police Department and Public Works Facility, the Town and B-P have been engaged in planning activities aimed at relocating the existing transfer station operations to the interior of the 72-acre parcel. The existing transfer station building is located approximately 350 feet from Cox Street, whereas the proposed facility will be located approximately 1,800 feet from Cox Street.

Proposed Facility

After securing the requested Minor Modification to the 1986 Site Assignment, the Proponents will also pursue permits and approvals for a new transfer station building permitted to accept up to 850 TPD of solid waste.

The solid waste material to be accepted at the proposed 53,000 square foot (sf) facility will be the same as currently accepted at the existing facility which consists of municipal solid waste (MSW), construction and demolition (C&D) waste, and bulky waste (Bulky Waste). The proposed facility will provide sufficient space to transfer these materials into semi-trailers that will transport the material off-site for final disposal or reclamation.

The proposed facility, like the existing facility, will allow Hudson residents to visit the facility to drop off MSW and household recyclables in an exterior drop-off area.

In addition to receiving solid waste, the proposed facility will also accept recyclable materials (glass, metal, plastic, paper) and, except for glass, provide for sorting and baling of these materials. The existing facility also accepts these recyclable materials. Since the recyclable materials are not solid waste, they are not subject to the Site Assignment and do not figure into the TPD limitation in the proposed Minor Modification.

The hours of operation of the proposed facility will remain unchanged from the current operating hours. It will be open to the public from 7:00 a.m. to 5:00 p.m., Monday through Friday, and Saturdays from 7:00 a.m. to 2:00 p.m. As is the case with the current operations, during the weekdays there may be some limited operations between the hours of 5:00 pm and 6:00 pm at the proposed facility as part of the daily facility shutdown. During this time, the facility will not be open to the public, but there may be some equipment operations occurring on the tipping floor.

Regulatory Approvals and Permitting Activity

The Secretary of the Executive Office of Energy and Environmental Affairs ("EOEEA") issued a Certificate on the Final Environmental Impact Report ("FEIR") for the proposed facility on November 29, 2024. A copy of the Certificate is attached as **Exhibit B**.

In the Certificate, the Secretary reviewed the FEIR for the proposed facility to be permitted to accept up to 850 TPD and concluded that the FEIR "**adequately and properly** complied with MEPA and its implementing regulations" (emphasis in original).

The Secretary also noted that the "entire site is within a valid site assigned area; however, the project will require a Minor Modification to the existing Site Assignment from the Hudson Board of Health in accordance with 310 CMR 16.22."

Though there is no tonnage limit in the 1986 Site Assignment, under the current Authorization to Operate Renewal from MassDEP dated December 12, 2022, Permit Application No. 22-SW06-0003-APP, and Authorization No. SW06-0000013, the existing facility is permitted to accept up to 350 TPD of MSW, C&D, and Bulky Waste combined.

To construct and operate the proposed facility, the Proponents will require MassDEP's review and approval for an Authorization to Construct Permit for Large Handling Facility (BWP SW 05) and an Authorization to Operate Permit for Large Handling Facility (BWP SW 06).

In addition to these two (2) state permits issued by MassDEP, the Proponents will require local approvals for the construction of the facility, including:

- an Order of Conditions pursuant to the Wetlands Protection Act and the Hudson Wetlands Protection Bylaw from the Hudson Conservation Commission authorizing construction within the wetland buffer zone;
- Site Plan Approval from the Hudson Planning Board; and
- a Building Permit and Occupancy Permit from the Hudson Building Department.

Traffic Impacts and Traffic Mitigation

The increase in tonnage from 350 TPD to 850 TPD is expected to generate a total of 370 new inbound truck trips to the facility (185 trucks entering to drop-off material; 185 trucks exiting empty) and a total of 44 new outbound truck trips (22 semi-trailers exiting full; 22 semi-trailers returning empty), on an average weekday.

As part of the MEPA process, B-P engaged Vanasse & Associates, Inc. ("VAI"), to prepare a Transportation Impact Assessment ("TIA") to identify the traffic impacts associated with the proposed facility. The VAI study was prepared in accordance with *MassDOT Guidelines for Transportation Impact Assessment* and was conducted pursuant to the standards of the traffic engineering and transportation planning professions for the preparation of such reports.

Based on the results of the TIA, VAI made the following conclusions:

- When including daily trips from an additional 17 employees that are anticipated to be working at the new transfer station (17 entering and 17 exiting per day, for a total of 34 trips), the proposed facility is expected to add approximately 448 new vehicle trips on an average weekday (two-way, 24-hour volume), with 90 new truck trips (45 entering and 45 exiting) expected during the weekday morning peak hour and 34 new truck trips (17 entering and 17 exiting) expected during the weekday afternoon peak hour.
- Project-related traffic increases external to the study area are projected to range between 2 to 28 vehicles during peak hours, with traffic percentage increases ranging from 0.1 to 1.5 percent.
- The analysis has indicated that the Project will result in minimal impact on motorist delays at the study intersections, as compared to future no-build conditions.
- No apparent safety deficiencies were noted with respect to the motor vehicle crash history at the study area intersections in the immediate area of the Property.
- Lines of sight at the proposed Property driveway where it will intersect with Cox Street were found to exceed or could be made to meet or exceed the recommended minimum distance for safe operation based on the appropriate approach speed.

VAI concluded that traffic increases will not result in significant increases on overall traffic volumes or traffic delays within the study area and the site driveway will provide efficient access to and from the development.

VAI also concluded that project-related traffic can be adequately accommodated within the existing off-site infrastructure with minimal impact on the traffic operations within the study area.

VAI made certain recommendations for traffic mitigation. Several of these recommendations, which are listed below, were also referenced in the Secretary's FEIR Certificate as Mitigation and Section 61 Findings:

- Install STOP-signs (Manual on Uniform Traffic Control Devices (MUTCD) R1-1), with a painted STOP-bar included, at all driveways.
- All signs and other pavement markings to be installed within the Project site shall conform to the applicable standards of the current MUTCD.
- Prompt removal of snow within the project site within sight triangle areas where such accumulations would impede sight lines.
- Maintain landscaping or signage along the site frontage or the site driveway to be no higher than 24 inches or be set back sufficiently from the edge of the roadways so as not to inhibit the available sightlines.
- Implement off-site improvements in collaboration with the Town of Hudson DPW, including:
    - Installation of appropriate warning signage, such as MUTCD designation W8-6 (Truck Crossing), along Main Street approximately 200 ft away from the intersection with Mackin Street, to alert motorists driving along Main Street to the possibility of trucks crossing at the intersection; and
    - Relocation of Main Street eastbound stop bar approximately 20 ft to the west of the intersection with Cox Street in order to reduce the level of encroachment from transfer station outbound trailers.

The Proponents agree with the proposed traffic mitigation measures and would support making them conditions of approval of the minor modification to the 1986 Site Assignment.

Based on the foregoing, the traffic impacts from the proposed facility will not constitute a danger to public health, safety, or the environment based on traffic congestion, pedestrian and vehicle safety, road configurations, and alternate routes.

Air Quality Impacts

The anticipated air emissions from the facility will not exceed required state and federal air quality standards and will not otherwise constitute a danger to the public health, safety or the environment. This conclusion takes into consideration:

- The concentration and dispersion of emissions. There are no significant stationary sources of air emissions proposed for the facility. Air emissions will be from trucks and cars traveling through

the facility and from non-road vehicles handling material within the facility. The concentration of emissions from each of these sources will be limited by relevant EPA on-road and non-road vehicle emissions standards.

- The number and proximity of sensitive receptors. The proposed facility will be located approximately 1,400 feet further into the Property than the existing transfer station, increasing the distance to homes and other sensitive receptors. Increasing the distance to sensitive receptors improves the dispersion of emissions. Given the distance to sensitive receptors, the anticipated emissions will not constitute a danger to public health, safety or the environment at the receptors.
- The attainment status of the area. The Commonwealth of Massachusetts is in "attainment" – that is, all locations are meeting the National Ambient Air Quality Standards ("NAAQS"). Those standards include primary standards intended to protect public health, including sensitive populations such as children and the elderly, and secondary standards intended to protect the environment.

With respect to vehicle emissions, traffic from the facility will not constitute a danger to the public health, safety, or the environment. As described in Section 3.2 of the April 2024 DEIR, Epsilon Associates, Inc. ("Epsilon"), performed an air quality analysis that included an estimate of the project-related vehicle and truck emissions. Epsilon determined that the worst-case intersection for projected air emissions in the project area is Lakeside Avenue & Lincoln Street in Marlborough, with about 40 peak project-related vehicles per hour, and a delay time of 76 seconds. Air emissions were compared with emissions from similar projects where air modeling was conducted. The results showed that the vehicle emissions would not result in air pollutant concentrations that exceed the NAAQS. The NAAQS are set at levels that are protective of the most sensitive population groups (e.g., older persons and children). Other intersections will have lower air emissions and lower impacts. As project-related emissions will not result in air pollutant concentrations that exceed these standards, the traffic impacts will not constitute a danger to public health.

House Keeping and Maintenance

Best Management Practices ("BMPs") will be performed to ensure the efficient and safe operation of the proposed facility. This will include clearing the tipping floor and conducting occasional floor washdown to maintain the general cleanliness of tipping floor operations, performing regular inspection and cleaning of floor trench drains, and repairing metal building panels in the event they become damaged. Similarly, access roads and drop-off areas will be maintained in good condition and security fencing will be routinely inspected and repaired if damaged.

Handling equipment (loaders, excavators, skid steers) and other on-site rolling stock (such as power sweeping equipment, hoist trucks, yard mules) will be maintained as part of a routine preventive maintenance program.

Dust and Odor Control

A dust control and odor control misting system will be installed in the proposed transfer station building. The system will consist of wall-mounted fog cannons that operate using a combined air/water mix to produce the misting spray.

A total of three fog cannons are proposed that will provide odor and dust control coverage for the MSW and C&D tipping floor and trailer pit areas. Two fog cannons will be located above the overhead doors that provide access onto the tipping floor and a third will be installed in the northwest corner of the building providing both tipping floor coverage and coverage at the two trailer pits. The fog cannons, which can be operated in both stationary and oscillating mode, will be connected to a central pump/deodorizer/control station via high pressure hydraulic piping.

The proposed facility will exercise dust and odor control mitigation measures as summarized below:

Dust Control

- Maintain paved vehicle traffic areas, including sweeping of these areas on a routine basis;
- Wet paved surfaces as necessary;
- Post signage regarding requirements for covering (tarping) of loads until inspection at the scale house;
- Provide verbal commands at the scale house;
- Handle all solid waste, including C&D materials, within the building; and
- Use the dust control water misting system in the C&D portion of the building.

Odor Control

- Handle commercial MSW loads within the building (residential MSW drop-off will be performed in the Residential Drop-off Area at the stationary compactors, which themselves will provide odor control through the fully enclosed containment of the residential MSW waste stream);
- Design, operate, and maintain the building's ventilation system to account for considerations such as odor and dust control, as well as management of emissions from mobile equipment operating on the tipping floor;

- Clean the tipping floors and travel ways regularly with a street sweeper and hoses, and clean the floor drains to prevent residue buildup;
- Employ a "first-in, first-out" policy for waste received at the facility, which will reduce the potential for odors to accumulate in the building;
- As an exception to the "first-in, first-out" waste transfer policy, odorous waste loads will take priority when loading trailers for off-site material disposal; and
- Use the MSW odor control misting system, which will contain odor control agents.

Further, inspection rounds will be completed regularly and operational data, including security video footage, will be recorded and maintained. Additionally, a hotline will be established to receive details from neighbors about any odor issues that arise. The collected information will be used to determine the cause of any odors, so that appropriate solutions may be implemented. B-P engaged Epsilon to complete an odor study which lists all design elements and operational practices which will be used to minimize odors and identify odor issues, as well as potential retrofit options to be implemented as necessary. A copy of the odor study is attached as **Exhibit C**.

Sound Issues

The proposed facility will be located approximately 1,400 feet further into the Property than the existing transfer station. Where the existing transfer station is located approximately 450 feet from the homes along Cox Street, the proposed facility will place the building approximately 2,000 feet from these homes. The facility relocation itself will result in an improvement in sound control at the site for nearby sensitive receptors. Noise modeling based on operational sound level measurements, completed by Epsilon, demonstrates that the facility will not cause sound experienced at the nearby residences and receptors to exceed the levels associated with a quiet residential area. The noise modeling results are presented in the sound study Epsilon prepared on behalf of B-P in support of the request for the site assignment modification. A copy of the sound study is attached as **Exhibit D**.

In addition to the improvement related to the building relocation, operation of the facility will incorporate the following noise mitigation practices:

- Collection vehicles owned by B-P, as well as those used in the operation of the facility, shall have "white noise" back-up alarms rather than traditional beepers. This BMP will be implemented with initial operation. Any traditional back-up alarms which must be used

will be set at the lowest levels allowed by OSHA and local regulations.

- Properly maintain equipment in use at the facility, including maintaining sound reducing devices, such as mufflers, installed on the equipment.
- Generate and supply training handouts for third-party truck drivers with steps that they should be taking in order to reduce and mitigate noise to the greatest extent possible, including minimizing idling and obeying speed limits.
- Arrange the facility layout to eliminate steep uphill grades for waste-hauling trucks.
- Conduct all tipping, sorting, storage, and loadout within the enclosed building.

Further, inspection rounds will be completed regularly and operational data, including security video footage, will be recorded and maintained. Additionally, a hotline will be established to receive details from neighbors about any noise issues that arise. The collected information will be used to determine the cause of any noise problems, so that appropriate solutions may be implemented. Additional mitigation measures and retrofit options can be found in the sound study completed by Epsilon.

Litter Control

Litter control at the facility will be exercised using procedures currently employed. Material delivered to the proposed facility will be confined to the interior of the transfer station building and areas of the site dedicated to residential drop-off activities. All commercial loads delivered to the site will be required to be covered and vehicles transporting material from the site will be covered prior to leaving the facility. Laborers will be responsible for the maintenance of the site, including collection of any windblown litter.

Employees will inspect the facility daily for material which could be dispersed due to wind conditions. If materials are found, they will be picked up for disposal or recycling. To reduce the potential for windblown litter and material dispersion, all containers subject to windy conditions will be properly covered and/or otherwise contained to the extent practicable. Routine sweeping of roadways will also assist with litter control. In addition, security fencing installed around the perimeter of the facility will help confine windblown litter on-site and facilitate its collection.

All areas of the proposed facility, including the building, the Residential Drop-off Area, and along the access road, will be inspected for litter and windblown material on a daily basis. Should litter and/or other windblown materials be encountered, including in areas along the perimeter fencing, they will be picked up during the daily cleanup activities.

Vector Control

C&D and Bulky Waste consist of non-putrescible materials and as such are not a food source that attract vectors. MSW on the other hand can provide a food source that may attract vectors such as rodents, insects, and birds. The best management practices aimed at maintaining odor control, such as the transfer of waste on a "first-in, first-out" basis and keeping the waste moving through the facility, will aid in vector control.

A vector control program, conducted by a professional exterminating service, will also be in-place at the proposed facility. The exterminating service will conduct routine inspections, set and collect trap stations, and advise B-P on housekeeping activities aimed at improving vector control as needed.

Public Benefits

The more modern, efficient transfer station will benefit the Town and the broader community. The proposed facility will have the space to transfer waste material into semi-trailers for offsite disposal or reclamation.

The proposed facility will also allow Hudson residents to drop off MSW and household recyclables in an exterior drop-off area. The new area will be over two times larger than the existing residential drop-off area and available for the exclusive use of Hudson residents only.

The proposed facility will also accept recyclable materials (glass, metal, plastic, paper) and provide for the sorting and baling of the metal, plastic, and paper within the building. Additional benefits include the creation of temporary construction and new full-time jobs, resulting in a positive impact due to construction spending and employment.

In addition to the benefits associated with the operational features of the proposed facility, B-P will continue to provide the following public benefits to the Town:

- Free trash and recycling to all town buildings (schools, town buildings, town fields; currently over 28 different locations).
- Free disposal at the transfer station for the Hudson Department of Public Works.
- Support to town community organizations and events by way of free container use and free disposal (examples: Assabet River Clean-up and Hudson Clean-up Day).

An additional benefit being provided in connection with the project is B-P's commitment to contribute $50,000 ($10,000 annually for the first five years from when the facility begins operating) to the Town of Hudson expressly for the purpose of tree planting associated with Town projects. The intent of this commitment is to assist the Town in adding new trees to greenspaces on public land. B-P will work with the Town to identify an appropriate financial mechanism for establishing and tracking funding used under the proposed tree planting program.

Conclusion

Given that the requested increase in daily tonnage will not present a danger to public health, safety, or the environment, and because there will be no adverse impacts to the community from the proposed facility, the Proponents respectfully request the Board of Health approve this request for a minor modification at a public hearing after providing notice in accordance with 310 CMR 16.00.

EXHIBIT A

BOARD OF HEALTH

TOWN HALL, HUDSON, MASSACHUSETTS 01749
PHONE 617-562-7050

January 26, 1987

At a Public Hearing held January 7, 1986 for the purpose of the Site Assignment of 1 Municipal Drive, plate 13, parcel 66, for use as a Refuse Transfer Station it was voted on by the Board of Health 3-0 in favor of granting the Site Assignment.

Site Assignment of 1 Municipal Drive, plate 13 parcel 66, granted January 7, 1986.

Patrick J. Colaluca

Patrick J. Colaluca

Chairman, Board of Health

PC/jh

EXHIBIT B

The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Maura T. Healey
GOVERNOR

Kimberley Driscoll
LIEUTENANT GOVERNOR

Rebecca L. Tepper
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1081
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November 29, 2024

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Hudson Solid Waste Transfer Station
PROJECT MUNICIPALITY	: Hudson
PROJECT WATERSHED	: SuAsCo
EEA NUMBER	: 16586
PROJECT PROPONENT	: B-P Trucking, Inc.
DATE NOTICED IN MONITOR	: October 23, 2024

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08(8) of the MEPA regulations (301 CMR 11.00), I have reviewed the Final Environmental Impact Report (FEIR) and hereby determine that it **adequately and properly** complies with MEPA and its implementing regulations.

Project Description

As described in the FEIR, the project consists of constructing a new approximately 53,000-square foot (sf) waste transfer station permitted to accept up to 850 tons per day (tpd) of solid waste consisting of municipal solid waste (MSW), construction and demolition (C&D) debris, and recyclable materials (glass, metal, plastic, paper).[1] The new facility is proposed to be located approximately 1,800 feet (ft) from Cox Street, and will provide enough space to transfer MSW and C&D debris into semi-

[1] This represents a 6,000 sf increase in the size of the transfer station from the ENF, resulting from further design development between filings, that was erroneously excluded from the Certificate on the Draft Environmental Impact Report (DEIR).

trailers that will transport the material off-site for final disposal or reclamation. Cardboard will be sorted and baled inside the facility and the remaining recyclables will be transported off-site via a semi-trailer to a material recovery facility. Additionally, the new facility will also allow Hudson residents to drop-off municipal solid waste and household recyclables in an exterior drop-off. Hours of operation will remain unchanged from the existing facility: open to the public Monday – Friday from 7:00am – 5:00pm, and Saturday from 7:00am – 2:00pm. The existing solid waste transfer station located on the site is currently permitted to accept up to 350 tpd of solid waste. The new facility will seek to increase this capacity by 500 tpd. The existing facility will be decommissioned, repurposed and likely utilized by the Hudson Department of Public Works (DPW) as a material stockpile and storage area, once the new facility is in operation.

Project Site and Procedural History

The Town of Hudson (the "Town") owns an approximately 72.4-acre parcel which consists of a number of municipal facilities, including an existing solid waste transfer station, the Hudson Fire Department, Hudson Wastewater Treatment Facility, the Hudson Police Department, and DPW Facility. The existing solid waste transfer station (8,286 sf) was constructed in 1988 and began operating in 1996. Since 1999, the waste transfer station has been operated by B-P Trucking (the "Proponent"). The existing transfer station accepts up to 350 tpd of solid waste consisting of MSW and C&D debris.

The existing solid waste facility was permitted when the Hudson Board of Health filed an ENF (EEA# 6415) on February 11, 1987; a Certificate was issued on March 3, 1987 stating that no EIR was required. The original site assignment did not include a tonnage limit. On December 23, 2000, the Proponent filed an ENF for the Hudson Transfer Station and Recycling Project (EEA# 12391) at this location; a Certificate was issued on January 1, 2001, and stated that no EIR was required.

State and local wetland resource areas located adjacent the project area include Bordering Vegetated Wetlands (BVW). According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Panel No. 25017C0343F, effective July 7, 2014), the project site is located approximately 500 ft from Zone AE associated with the Assabet River with a Base Flood Elevation (BFE) of 196 ft NAVD88. According to the Massachusetts Natural Heritage and Endangered Species Program (NHESP) Atlas (15th Edition), the site is not located within Estimated and Priority Habitats of Rare Species. The site was previously subject to an archaeological survey, though no archaeological resources were identified on-site.

According to preliminary mapping of Environmental Justice (EJ) Populations available when the Environmental Notification Form (ENF) was filed, the site is located within one mile (0.3-miles) of one EJ Population characterized by Minority and within five miles of 16 additional EJ Populations characterized by Minority (13), Minority and Income (1), and Minority, Income, and English Isolation (2). The Draft Environmental Impact Report (DEIR) previously identified the "Designated Geographic Area" (DGA) for the project as five miles around EJ Populations, included a review of potential impacts and benefits to EJ Populations within this DGA, and described public

outreach efforts undertaken to date.[2] The FEIR maintained the five mile DGA and included additional analyses in accordance with the Scope.

Changes Since the DEIR

Since the filing of the DEIR, there have been no physical changes to the proposed building or site layout; however, the Proponent has been working to update the project's design, and address comments and concerns raised by state and local agencies. In particular, the FEIR details the following changes:

- **Low Impact Development (LID) Measures** – In response to the DEIR Certificate, the Proponent has incorporated a number of LID measures into the stormwater management system, including grassed swales, grassed buffer areas, permeable pavers, and bioretention basins.
- **Wastewater** – As noted in the DEIR, the Proponent had previously proposed conveying wastewater captured by the transfer station's floor drains to an on-site holding tank. Comments provided by MassDEP on the DEIR noted that conveyance of industrial wastewater generated from the building's floor drain system to an on-site holding tank would not be permittable. Therefore, the Proponent has revised the wastewater collection system to convey captured wastewater through an oil/water separator and into the municipal sewer system.
- **Dust and Odor Control** – The Proponent conducted further evaluation of the overhead dust and odor control misting system previously proposed in the DEIR, in response to MassDEP comments, which would be deactivated during the winter months (generally from December through March) to prevent freezing. Based on this evaluation, the Proponent is now proposing a wall-mounted fog cannon that will operate using a combined air/water mix to produce the misting spray, allowing the system to operate throughout the year without requiring a system deactivation during the winter months.

In addition, the FEIR clarifies changes made to the project between the ENF and DEIR filings that were not fully identified in the Certificate on the DEIR. Specifically, design development changes that occurred between the ENF and DEIR filings resulted in a 1.8-acre increase in direct land alteration and creation of impervious surface. Specifically, the proposed access roads and paved areas were refined to accommodate vehicle access to and movement within the proposed residential drop-off area (RDOA), and vehicle access and movement in and around the transfer station building. Pavement areas were also refined to accommodate empty trailer storage, temporary full trailer vehicle layover, and roll-off container storage. These changes also increased the size of the transfer station from 47,000 sf to 53,000 sf (a 6,000-sf increase).

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include 12.6 acres of land alteration, creation of 8.2 acres of impervious area, and addition of 448 vehicle trips (1,202 vehicle trips total and

[2] Under updated mapping issued on November 12, 2022 and made effective January 4, 2023, 25 EJ Populations are present within the 5-mile DGA and are designated as Minority (20); Income (1); Minority and Income (3); and Minority, Income, and English Isolation (1). Pursuant to MEPA guidance issued in November 2022, the project is allowed to proceed under scoping issued prior to the change in mapping. In any event, the DEIR provides analysis to disclose impacts to currently mapped EJ Populations.

414 truck trips).[3] The project will add 20 parking spaces (26 spaces total); use 1,540 additional gallons of water per day (gpd) (for a total usage of 1,850 gpd); and generate 535 additional gpd of wastewater (for a total generation of 660).[4] The facility will increase handling of solid waste by 500 tpd (and is proposing to accept 850 tpd of solid waste total).

Measures to avoid, minimize, and mitigate project impacts include the installation of erosion and sedimentation controls; utilization of best management practices (BMPs) during construction; designing stormwater infrastructure for climate resiliency; elevation of essential mechanical systems to reduce risk of flooding; and installation of a water misting system to suppress dust and odors. The Proponent has also committed to donate $50,000 ($10,000 annually for the first five years from when the facility begins operating) to the Town expressly for the purpose of tree planting associated with Town projects. In addition, the additional capacity of the facility is anticipated to improve waste management in the area and address anticipated capacity concerns associated with solid waste management.

Jurisdiction and Permitting

This project is subject to MEPA review because it requires Agency Action and meets/exceeds the ENF thresholds at 301 CMR 11.03(1)(b)(2) for the creation of five or more acres of impervious area and 301 CMR 11.03(9)(b)(1) for New capacity or Expansion in capacity for combustion or disposal of any quantity of solid waste, or storage, treatment or processing of 50 or more tpd of solid waste.[5] The project is required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA of one or more EJ Populations. The project will require an Agency Action in the form of an Authorization to Construct Permit for Large Handling Facility and Authorization to Operate Permit for Large Handling Facility from the Massachusetts Department of Environmental Protection (MassDEP).

The project requires a local Order of Conditions (OOC) from the Hudson Conservation Commission; if the OOC is appealed, a Superseding OOC will be required from MassDEP. The entire site is within a valid site assigned area; however, the project will require a Minor Modification to the existing Site Assignment from the Hudson Board of Health, in accordance with 310 CMR 16.22.

Although the project is not receiving Financial Assistance from an Agency, MassDEP's site suitability regulations are broad enough to confer broad scope jurisdiction for purposes of MEPA review Therefore, MEPA jurisdiction extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

[3] This represents an increase of 1.8 acres of land alteration and impervious surface from the ENF, resulting from further design development of the proposed access roads and paved areas.

[4] This represents an increase of 460 gpd of water usage and 315 gpd of wastewater generation from the DEIR, resulting from the proposed change in dust and odor control system.

[5] As discussed below, the project is proposed to be a "transfer station," and, therefore, is asserted to be exempt from the mandatory EIR threshold at 301 CMR 11.03(9)(a) *for New Capacity or Expansion in Capacity of 150 or more tpd for storage, treatment, processing, combustion or disposal of solid waste, unless the Project is a transfer station, is an Expansion of an existing facility within a validly site assigned area for the proposed use, or is exempt from site assignment requirements.* As noted, the project requires EIR review in any event due to its proximity to EJ Populations.

Review of the FEIR

The FEIR included a project description, existing and proposed conditions plans, revised estimates of project-related impacts, and an identification of measures to avoid, minimize and mitigate environmental impacts. The FEIR provided a response to comments on the DEIR and draft Section 61 Findings.

I acknowledge comments from residents, including from those that reside in proximity to the project site, which identify concerns regarding potential air quality impacts of the proposed project, primarily resulting from the increase in solid waste tonnage and daily truck trips. As discussed below, the Proponent provided further analysis in the FEIR, including a survey of asthma rates for surrounding census blocks and a further assessment of elevated "environmental indicators" through EPA's EJ Screen Tool. While these tools do not appear to show elevated air quality indicators in the immediate vicinity of the site, the project nonetheless will route 96% of truck traffic through these neighborhoods and several K-8 schools with reported asthma rates above statewide average are located near these designated truck corridors. The Proponent has committed to contributing $50,000 towards tree planting efforts to mitigate project impacts, and it is strongly encouraged that the selection of planting locations prioritize communities along designated truck routes in light of the potential co-benefits of tree planting to improving air quality. As noted above, the Proponent has also committed to installing a dust and odor control system that will operate throughout the year and designing the building's ventilation system to further account for odors and emissions from mobile equipment.

Environmental Justice (EJ) / Public Health

As noted above, the project site is located within one mile of two EJ Populations characterized by Minority within the City of Hudson. The site is also located within five miles of 23 additional EJ Populations characterized by Minority (18), Income (1), Minority and Income (3), and Minority, Income, and English Isolation (1). Portuguese or Portuguese Creole are identified as being spoken by 5% or more of Limited English Proficiency ("LEP") residents within one mile and five miles of the site. Spanish or Spanish Creole are also identified as being spoken by 5% or more of LEP residents within five miles of the site.

The DEIR previously provided a "mesoscale" air quality analysis for the traffic study radius around the project site indicating that the added emissions from the 448 new vehicle trips (414 new trucks) associated with the project would not increase the estimated air pollutants—volatile organic compounds (VOC), nitrogen oxides (NOx), particulate matters (PM2.5 and PM10) and Diesel PM (DPM)—as compared to Existing 2024 Conditions (though a small increase was expected from future 2031 No Build to 2031 Build conditions). The DEIR also indicated that only two EJ block groups in Marlborough (block groups 3213.02-2 and 3214-2) display elevated environmental health indicators related to air quality (according to DPH EJ Tool and EPA EJScreen), but showed that only a small portion (about 5%) of truck trips would extend in that direction. Nevertheless, giving mapping that showed that the proposed truck routes would expose EJ Populations immediately to the west and south of the site to up to 94% of semi-trailer truck trips and up to 60% of packer/roll-off truck trips, the DEIR Scope required further assessment of health conditions in those EJ areas.

The Proponent previously evaluated childhood asthma rates as part of its "vulnerable health EJ criteria"[6] analysis; however, the Massachusetts Department of Public Health (DPH) EJ tool only estimates asthma rates by municipality and thus has limited capacity to report neighborhood level asthma conditions. In accordance with the Scope, the FEIR included an analysis of childhood asthma rates for k-8 schools servicing the three Hudson EJ neighborhoods (census block groups 3222-1, 3223-3 and 3224-2), utilizing the MassDEP Cumulative Impact Analysis (CIA) Mapping Tool.[7] The FEIR includes the following table detailing the results of the analysis:

School Name/ Census Tract	Street Name	Average Case Count	Average Enrollment Count	Pediatric Asthma Prevalence (% of students)	Pediatric Asthma Prevalence (% of MA rate)	Pediatric Asthma Prevalence (%tile)
C A Farley/3223 and 3224	Cottage Street	68.3	486	14.1	115%	68
Forest Avenue Elementary/3222 and 3224	Forest Avenue	43.7	325	13.4	110%	64
David J. Quinn Middle School/3223	Manning Street	85	656.7	12.9	105%	60
Mulready Elementary/3224	Cox Street	26	253.3	10.3	84%	39

As shown above, the analysis indicates that childhood asthma rates are slightly higher than the statewide average rate of 12.2 % for all the schools evaluated except for the Mulready Elementary School, which is the closest school to the project site (which is below statewide average). The FEIR states that these data reinforce that asthma is a complex, multi-factorial disease, with multiple triggers and risk factors beyond outdoor ambient air pollution. In addition, none of the air quality environmental indicators assessed by the U.S. EPA's "EJ Screen" Tool, which shows a percentile measure of each indicator by census block as compared to the MA statewide average, were elevated above the 80th percentile of statewide average within the Town.[8] Therefore, the FEIR states that when evaluated in conjunction with the DEIR air quality analysis, which, as discussed above, showed no increase in emissions from Existing 2024 conditions over the traffic study radius, the project is anticipated to result in minor contributions to overall air pollution levels and would not result in a disproportionate adverse effect on EJ Populations based on the cumulative effects on existing pollution burdens and project impacts.

The FEIR further evaluated potential air quality impacts on EJ neighborhoods located in the Town of Marlborough (census tracts 3213.02-2 and 3214-2), where truck traffic will extend. In particular, the Transportation Impact Assessment (TIA) was extended into Marlborough to evaluate the impact of these truck trips. According to the FEIR, the worst-case intersection identified was Lakeside Avenue/Lincoln Street (located within an EJ Population characterized by Minority), based on peak

[6] This term is defined in the DPH EJ Tool to include any one of four environmentally related health indicators (heart attack hospitalization, childhood asthma, childhood blood lead, and low birth weight) that are measured to be 110% above statewide rates based on a five-year rolling average.
[7] Available at: https://mass-eoeea.maps.arcgis.com/apps/webappviewer/index.html?id=5a876b759df24d10b4a9e9e5b3921310
[8] According to the EPA's EJ Screen Tool, within the three EJ neighborhoods in Hudson, only Wastewater Discharge Proximity was shown to be above 80th percentile of statewide average.

morning emissions with about 40 peak project-related vehicles per hour, and a delay time of 76 seconds. While these additional truck trips will contribute minimally to overall air quality at this intersection, only a small portion (about 5%) of truck trips would extend in this direction. The Proponent also consulted the EPA's EJ Screen, which shows a percentile measure of each indicator by census block as compared to the MA statewide average, for the two census tracts within Marlborough (census tracts 3213.02-2 and 3214-2) along truck routes. The analysis indicated that three indicators (NATA Air Toxics, RMP Proximity, and Hazardous Waste Proximity) were shown to be 80th percentile or higher of statewide average in these two census tracts:

- NATA Air Toxics: 99th Percentile (3214-2)
- RMP Proximity: 83rd Percentile (3213.02-2) and 95th Percentile (3214-2)
- Hazardous Waste Proximity: 83rd Percentile (3214-2)

According to the FEIR, these environmental indicators (except NATA Air Toxics) are proximity indicators, which are proxies for potential environmental exposures but do not represent actual exposures. In addition, none of the air pollutants that are typically of concern for diesel traffic, including fine particulate matter ($PM_{2.5}$), diesel particulate matter (DPM), and ozone, were elevated compared to state levels.

In order to further evaluate potential impacts, the Proponent also expanded its survey of EJ Screen factors to the full five mile DGA around the site; as shown below, when aggregated across the entire five mile DGA, none of the indicators are shown to be 80th percentile or higher of statewide average:

- Particulate Matter ($PM_{2.5}$): 73rd Percentile
- Ozone: 23rd Percentile
- Nitrogen Dioxide: 37th Percentile
- NATA Diesel Particulate Matter (DPM): 35th Percentile
- NATA Air Toxics: 48th Percentile
- Traffic Proximity: 26th Percentile
- Superfund Proximity: 56th Percentile
- RMP Proximity: 28th Percentile
- Hazardous Waste Proximity: 38th Percentile

According to the FEIR, while air quality impacts are anticipated to result from project construction activities, construction period adverse effects would be mitigated to the greatest extent practicable through use of construction period best management practices (BMPs), including the use EPA Tier 4 construction equipment or equipment retrofitted with diesel emission control devices to the greatest extent practicable; Ultra-Low Sulfur Diesel for all trucks and construction machinery; maintaining an "idle free" work area; and minimizing exposed storage of debris on-site through measures such as wetting soils prior to disturbing and covering stockpiles. The Proponent has also committed to minimize the frequency of truck routing through EJ communities, for those vehicles that are under the Proponent's direct control. In addition, the Proponent has committed to donating $50,000 ($10,000 annually for five years) to the Town expressly for the purpose of tree planting associated with Town projects, which could have the co-benefit of improving air quality for overburdened neighborhoods. The FEIR states that it is anticipated that these projects would be performed under the

authority of the Hudson DPW and the donated funds would be used by the Town to support tree planting in Town rights-of-way for roadway improvement projects and other similar projects that benefit the community. As noted, while existing air quality indicators are not shown to be elevated above 80th percentile of statewide rates for the communities directly near the site, the project nonetheless will route 96% of project truck traffic through the three Hudson EJ neighborhoods in close proximity to the site; in addition, several K-8 schools where asthma rates are reported to be above statewide average are located near designated truck routes. In these circumstances, it is strongly recommended that the Proponent work with the Town to select planting areas that best serve residents along the anticipated truck routes. I also encourage the Proponent to explore additional fuel alternative options and early adoption of the Advanced Clean Truck regulations (at 310 CMR 7.40) to reduce GHG emissions, including the use of trucks meeting the above forthcoming emissions standards and EV truck tractors.

Land Alteration and Stormwater

In accordance with the Scope, the FEIR provides additional details regarding total land alteration and creation of impervious surfaces. According to the FEIR, the design development changes that occurred between the ENF and DEIR filings resulted in a 1.8-acre increase in direct land alteration and creation of impervious surface. Specifically, the proposed access roads and paved areas were refined to accommodate vehicle access to and movement within the proposed residential drop-off area (RDOA), and vehicle access and movement in and around the transfer station building. Pavement areas were also refined to accommodate empty trailer storage, temporary full trailer vehicle layover, and roll-off container storage. Based on an analysis of existing cover types, the project is anticipated to alter 0.18 acres of existing paved area; 0.01 acres of existing building area; 1.18 acres of gravel area; 0.24 acres of grassed area; 1.55 acres of scrub/shrub; and 9.44 acres of woodland.

As noted above, the Proponent has incorporated a number of LID measures into the stormwater management system, including grassed swales, grassed buffer areas, permeable pavers, and bioretention basins. In general, these areas are located where the Proponent had originally proposed grassed islands, within or adjacent to paved areas. Permeable pavers are proposed for installation in the parking stalls in the employee parking lot, encompassing an area of approximately 4,600 sf. The permeable paver system will be comprised of a concrete paver underlain by a sand layer, stone base layer, and stone reservoir layer. The system will collect and infiltrate stormwater runoff from the parking lot area. According to the Proponent, the Stormwater Report will be updated to reflect the incorporation of these LID measures; however, any additional attenuation or recharge benefits they would provide would supplement those already presented in the DEIR.[9] The other components of the stormwater management system will continue to consist of four subsurface detention/infiltration structures and oil grit separators, 50 deep-sump catch basins, 29 drain manholes, and associated drainage piping. In addition, the system has been designed to convey and provide peak attenuation for stormwater runoff up to the future (2070) 50-year storm event (9.5 inches).

Solid Waste

According to the FEIR, the proposed transfer station will consist of two primary operational areas: an approximately 53,000 sf transfer station and recycling building, and an approximately 1.3-acre

[9] Confirmed by email from Alex Brooks (Epsilon Associates) to Nicholas Moreno (MEPA) on November 22, 2024.

RDOA, which will be reserved for Hudson residents who choose to visit the site to drop-off their household waste and recyclables. As noted above, a Minor Modification to the existing site assignment will be sought from the Hudson Board of Health, in accordance with 310 CMR 16.22(3) to address the increase in permitted tonnage from 350 tpd to 850 tpd, prior to seeking authorization permits from MassDEP.

As noted above, the Proponent has incorporated changes to the proposed facility's wastewater management system, and dust and odor control misting system, in response to comments provided by MassDEP on the DEIR. Wastewater collected via the transfer station's floor drains will no longer be conveyed to an on-site holding tank but instead will be conveyed through an oil/water separator and into the municipal sewer system. The Proponent originally proposed the installation of a dust control and odor control misting system that would be deactivated during the winter months (generally from December through March) to prevent freezing in the misting system lines. However, the system has been redesigned in order to operate throughout the year. The FEIR states that a total of three wall-mounted fog cannons, that operate using a combined air/water mix to produce the misting spray, will be installed around the tipping floor and trailer pit areas. Two fog cannons will be located above the overhead doors that provide access onto the tipping floor and a third will be installed in the northwest corner of the building providing both tipping floor coverage and coverage at the two trailer pits. In addition, the building's ventilation system will be designed to account for considerations such as odor and dust control, as well as management of emissions from mobile equipment operating on the tipping floor.

In accordance with the Scope, the FEIR includes a capacity analysis which evaluates the rate at which MSW and C&D waste can be moved through the transfer station during peak operating conditions as well as the temporary floor storage space needed to support material handling activities during peak operations. The transfer station building will provide a large tipping floor area for MSW (approximately 17,800 sf) and unprocessed C&D waste (approximately 12,900), and a recyclables processing area for the sorting and baling of recyclable materials. The facility will also include two drive-through trailer pits located below the tipping floor in order to expedite loading. According to the analysis a typical 100 cubic yard (cy) trailer can be loaded and exiting the facility in under 20 minutes. Based on the proposed increase in tonnage capacity of 850 tpd (650 tpd of MSW and 200 tpd of C&D waste), all 850 tons can be loaded into trailers in under nine hours. The tipping floor has also been sized to provide at least 1,300 cy of space for MSW and 800 cy of space for C&D waste, with approximately 400 cy of supplemental space available. In addition, the existing facility currently accommodates 5,800 tons per year (tpy) or approximately 22 tpd of recyclables from both businesses and residents. The project facility has been designed to account for future growth in recyclable quantities and will capacity to accommodate 20,000 tpy or approximately 77 tpd of recyclables.

According to the FEIR, C&D processing will not be performed at the proposed facility; however, since the facility will be classified as a "Large C&D Transfer Station," the facility must be operated in compliance with the MassDEP's Minimum Performance Standard (MPS) applicable to C&D handling facilities. The MPS establishes performance criteria that are intended to improve the efficiency of C&D handling facilities in separating banned and other recoverable materials from inbound waste loads. However, facilities that elect to transfer all unprocessed or partially processed C&D materials to an MPS-compliant facility for further processing, after first separating clean gypsum wallboard and zero-tolerance waste ban items, are exempt from meeting the MPS criteria. The FEIR states that C&D loads

from the proposed transfer station will be shipped to the ReSource Waste Services of Epping C&D Processing Facility, located in Epping, New Hampshire, which provides MassDEP data annually to demonstrates the processing facility meets the MPS.

Climate Change

Adaptation and Resiliency

As noted above, the project is anticipated to result in the alteration of 11.23 acres of vegetated area, including 9.44 acres of tree clearing. Based on a LiDAR analysis, approximately 7.87 acres of the roughly 9.44-acre woodland disturbance area consists of conifers and the remaining 1.57 acres consists of deciduous trees. Conifer heights generally ranged from 50 to 80 ft, whereas deciduous tree heights ranged from 10 to 50 ft. The FEIR states that the Proponent also conducted an evaluation of measures to reduce the impacts associated with tree removal. According to the FEIR, existing trees will be preserved along portions of the southern and eastern property boundaries of the project site to the maximum extent possible and LID measures have been incorporated into the stormwater management system. As noted, the Proponent has committed to donate $50,000 ($10,000 annually for the first five years from when the facility begins operating) to the Town expressly for the purpose of tree planting associated with Town projects. It is anticipated that these projects would be performed under the authority of the Hudson DPW and the donated funds could be used by the Town to support tree planting in Town rights-of-way for roadway improvement projects and other similar projects that benefit the community. In addition, the Proponent has committed to further evaluating the feasibility of incorporating tree plantings into the proposed design, specifically in grassed areas where such plantings would not interfere with stormwater management. As noted, it is encouraged that the locations for tree plantings prioritize communities along designated truck routes, as well as locations of nearby K-8 schools.

In accordance with the Scope, the Proponent consulted the recommended methodologies in the Climate Resilience Design Standards Tool to evaluate the project's heat resiliency. As part of the evaluation of the project's resiliency to future heat conditions, "hot spot" areas within 500 ft of tree clearing activities were identified using present-day land surface temperature indices available through the Resilient MA Climate Change Projections Dashboard. Based on the evaluation, one existing hot spot is located in the center of the municipal complex adjacent to the project site, approximately 100 feet from the proposed tree clearing area. The FEIR states that this area is not located within an EJ community and the closest hot spot to the site that is located within an EJ community is approximately 0.9 miles away. Furthermore, the FEIR states that since the effects of hot spots tend to be localized, any potential heat impacts of tree clearing on the site would be limited to the project site itself and would not exacerbate any existing hot spot conditions that may be mapped within nearby EJ communities. Nevertheless, the Proponent has committed to preserving existing trees along portions of the southern and eastern property boundaries to the extent possible and will continue to explore opportunities to incorporate tree plantings on-site.

Construction Period

According to the FEIR, construction is anticipated to begin in spring 2026 with the facility to begin operating in 2027. The existing transfer station will cease operations once the new transfer station begins operating.

All construction and demolition activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle construction and demolition (C&D) debris to the maximum extent.

Mitigation and Section 61 Findings

The FEIR provides final mitigation commitments and draft Section 61 Findings for use by Participating Agencies, which are summarized below. The Section 61 Findings should be provided to Participating Agencies to assist in the permitting process and issuance of final Section 61 Findings.

Environmental Justice (EJ) / Public Health

- Install a dust and odor control system, consisting of three wall-mounted fog cannons, around the tipping floor and trailer pit areas that will operate throughout the year.
- Design the building's ventilation system to account for considerations such as odor and dust control, as well as management of emissions from mobile equipment operating on the tipping floor.
- Donate $50,000 ($10,000 annually for the first five years from when the facility begins operating) to the Town of Hudson expressly for the purpose of tree planting associated with Town projects. It is encouraged that selection of planting locations prioritize the communities along designated truck routes for the project.

Land Alteration and Stormwater

- Protect and maintain existing trees along portions of the southern and eastern property boundaries of the project site to the maximum extent practicable.
- Further evaluate whether tree planting opportunities exist on-site in proposed grassed areas where trees would not interfere with the functioning of the stormwater management system.
- Donate $50,000 ($10,000 annually for the first five years from when the facility begins operating) to the Town of Hudson expressly for the purpose of tree planting associated with Town projects.
- Construction of a stormwater management system, (including deep-sump, hooded catch basins, oil/grit separators, subsurface detention/infiltration structures, and sediment forebays paired with infiltration basins) designed to convey and provide peak attenuation for stormwater runoff up to the future (2070) 50-year storm event (9.5 inches).

- Incorporate Low Impact Development (LID) measures into the stormwater management system, including grassed swales, grassed buffer areas, permeable pavers, and bioretention basins.

Wetlands and Water Resources

- Comply with all Standard and Special Conditions to be included in the Order of Conditions issued by the Hudson Conservation (or MassDEP in the case of an appeal).
- Prepare and implement a Stormwater Pollution Prevention Plan (SWPPP).
- Protect wetland resource areas from secondary impacts during construction through the implementation of erosion and sedimentation controls, incorporating BMPs.

Transportation

- Install STOP-signs (Manual on Uniform Traffic Control Devices (MUTCD) R1-1), with a painted STOP-bar included, at all driveways.
- Install all signs and other pavement markings within the project site to the applicable standards of the current MUTCD.
- Prompt removal of snow within the project site within sight triangle areas where such accumulations would impede sight lines.
- Maintain landscaping or signage along the site frontage or the site driveway to be no higher than 24 inches or be set back sufficiently from the edge of the roadways so as not to inhibit the available sightlines.
- Implement off-site improvements in collaboration with the Town of Hudson Department of Public Works, including:
    - Installation of appropriate warning signage, such as MUTCD designation W8-6 (Truck Crossing), along Main Street approximately 200 ft away from the intersection with Mackin Street, to alert motorists driving along Main Street to the possibility of trucks crossing at the intersection; and
    - Relocation of the Main Street eastbound stop bar approximately 20 ft to the west of the intersection in order to reduce the level of encroachment from transfer station outbound trailers

Climate Change

Adaptation and Resiliency

- Locate the proposed transfer station building approximately 500 ft from the current edge of the 100-year floodplain associated with the Assabet River to the north of the site.
- Design and construct the transfer station building with the lowest floor elevation (the trailer pit floors) approximately 10 ft above the 100-year BFE of the Assabet River and the major operational space of the building (tipping floor) approximately 22 ft above the BFE.
- Construction of a stormwater management system, (including deep-sump, hooded catch basins, oil/grit separators, subsurface detention/infiltration structures, and sediment forebays paired with infiltration basins) designed to convey and provide peak attenuation for stormwater runoff up to the future (2070) 50-year storm event (9.5 inches).
- Donate $50,000 ($10,000 annually for the first five years from when the facility begins operating) to the Town of Hudson expressly for the purpose of tree planting associated with Town projects.

Greenhouse Gas Emissions

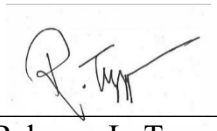
- Design and construct the proposed buildings and structures to achieve compliance with updated Stretch Code requirements through the use of energy mitigation measures, including:
  - High performing building envelopes for conditioned office spaces;
  - 100% electric heat pump space heating and cooling;
  - Electric domestic hot water heating via air source heat pumps;
  - Roof to be constructed PV-ready; and
  - Install electric vehicle (EV) charging and readiness per 2023 Stretch code requirements.
- Submit a self-certification to the MEPA Office, prepared in accordance with the MEPA GHG Policy, that identifies the GHG mitigation measures incorporated into the building and will detail the compliance to the GHG reduction commitments detailed above.

Construction Period

- Implement mitigation measures to prevent stormwater contamination including among others, use of erosion and sedimentation controls.
- Limit fugitive dust emissions using industry-best practices, such as watering, sweeping, and wheel-washing.
- Reduce potential air emissions through the use of heavy equipment retrofitted with diesel emissions control devices, using Ultra Low Sulfur Diesel for all trucks and construction machinery, and minimizing idling.
- Minimize construction period noise impacts to the extent feasible through the use of mufflers, selection of quieter equipment, and minimizing idling.

Conclusion

Based on a review of the FEIR, comment letters, and in consultation with Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. Outstanding issues may be addressed during the local, state, and federal permitting processes. No further MEPA review is required, and the project may proceed to permitting. Participating Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.



November 29, 2024
Date

Rebecca L. Tepper

Comments received:

Comments submitted on the MEPA Public Comment Portal

11/14/2024 Keith Griffis

11/14/2024 Sara Frost
11/18/2024 Sushma Singh
11/18/2024 Anonymous
11/19/2024 Cindy Boland
11/21/2024 James Carvalho
11/21/2024 Per & Lena Gyllstrom
11/21/2024 LJ Strz
11/22/2024 Julie Bolduc

Comments submitted by email

11/14/2024 Ashley Murphy
11/14/2024 Sarah Bis
11/15/2024 Katie Cunningham
11/18/2024 Alicia Smith
11/18/2024 Jaime Olivo
11/18/2024 Michelle Bernier-Capaldo
11/18/2024 Tim Porter
11/19/2024 Robert Burgess
11/19/2024 Shira Meadows
11/20/2024 Tony Pires
11/21/2024 Jeanette Millard
11/22/2024 Barabara Worley
11/22/2024 Brianna Graca
11/22/2024 Sarah Wise
11/22/2024 Rachel Attaway
11/22/2024 Katie Staines
11/22/2024 Kelli Peterson
11/22/2024 Riverside Gun Club
11/22/2024 Massachusetts Department of Environmental Protection (MassDEP) Central Regional Office (CERO)
11/27/2024 Massachusetts Department of Energy Resources (DOER)

RLT/NJM/njm

Outlook

Hudson transfer station

From Ashley Murphy <murphyashleyc@gmail.com>
Date Thu 11/14/2024 2:51 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon Mr. Moreno,
I'm writing as a concerned Mulready Elementary parent and Hudson resident regarding the Hudson transfer station FEIR proposal. The smell from the garbage at the transfer station permeates the Mulready playground on a daily basis. It's unpleasant to say the least. I'm concerned about student and staff health and safety as it is, and adding more waste capacity will only make things worse. In addition, the increased traffic of large trucks coming and going throughout the day, adding to air pollution and safety concerns. I've been pulling out of the Mulready parking lot seeing trucks flying by the school on their way to the transfer station as students are walking to and from school. Hudson doesn't need to take on everyone else's trash.

Ashley Murphy
Hudson resident

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16586	KEITH	6 STRATTON ROAD	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-14-2024	GRIFFIS	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-22-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	keithdgriffis@gmail.com	01749	

Comment Title or Subject

Topic: Our Students Deserve Better

Comments

I am a resident of hudson and have two girls with chronic health conditions at Mulready School. My concern of this project is that it is going to increase traffic, capacity, noise, and be in ther literal back yard near the playground.

if you have ever set foot in this areas you can realize the kids are already smelling noxious fumes during the day. They keep windows closed to keep the smell out. Their claim of holding public sessions are a joke. Nobody has any idea this is coming until a parent stumbled on it today. People are outraged. We are going to take this to the news media if needed to stop the increase in capacity. The move of location is better, but the proximity to a fragule ecosystem is already a major concern on top of our students health. Please consider the points below and restrict the capacity - there is only 50 tons generated in town a day - WHY DO WE NEED 850? This is a money making sceheme due to the high density of contracts with construction waste in surrounding towns. Please stop it or put a cap on the waste below 450 tons a day.

- Poor Air Quality: The increase in diesel truck traffic due to the facility's expansion is expected to contribute significantly to air pollution, particularly diesel particulates. Such pollution could adversely affect the health of young children, exacerbate conditions like asthma, and pose risks to their developing lungs.

- Proximity to School: The proposed transfer station is located adjacent to Mulready Elementary School. The proximity raises concerns about persistent noise from truck backup alarms, trailer hitching, and constant vehicle movement, creating a disruptive learning environment for students.

- Proximity to Wetlands: The project includes work within the wetland buffer zone, which may lead to environmental concerns, including the potential impact on local ecosystems that can influence the overall health and wellness of the surrounding communities, including school children.

- Significant Increase in Waste Processed: The expansion plan proposes increasing the transfer station’s capacity to handle an average of 850 tons of solid waste per day, which is significantly more than the 60 tons per day generated by the town of Hudson. This expansion is not solely serving the local community's needs and will attract additional external waste and associated traffic.

Attachments

Update Status

Status

Accepted

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Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16586	Sara	2 Edith Road	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-14-2024	Frost	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-22-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	drsarafrost@gmail.com	01749	

Comment Title or Subject

Topic: Keep Hudson Safe and Clean!

Comments

To whom it may concern,
My name is Dr. Sara Frost, and I am a concerned parent of a child attending Mulready Elementary School. I also reside near the BP Transfer Station. I am writing to express my strong opposition to the proposed significant increase in the station's tonnage.
The town currently utilizes a mere 50 tons of the transfer station's capacity. This means that the station is operating at only 6% of its current capacity. Despite this, the proposed expansion aims to increase the capacity to a staggering 850 tons, representing a 1700% increase. Such a drastic expansion will have severe environmental consequences.
Increased waste handling will lead to:

- **Air pollution:** The release of harmful pollutants and greenhouse gases.
- **Water pollution:** Potential contamination of local water bodies and groundwater.
- **Land degradation:** The need for more landfill space, leading to the loss of valuable land and natural habitats.
- **Increased traffic:** More trucks will transport waste to the facility, causing traffic congestion, noise pollution, and safety hazards.

Moreover, the expansion will negatively impact the health and well-being of our community, particularly our children. The increased traffic, noise, and potential odors will disrupt the peaceful nature of our neighborhood and create a less desirable living environment, potentially subjecting us to unpleasant smells.
I urge you to prioritize the health and safety of our community and the environment. Please reject the proposal to increase the transfer station's tonnage by such a significant amount. I also request that you consider alternative solutions for managing the town's waste, such as improved recycling programs or waste reduction initiatives.
Thank you for your time and consideration.
Sincerely,
Sara Frost, PhD

Attachments

Update Status

Status

Accepted

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Outlook

Hudson Solid Waste Transfer Station, Project 16586

From Sarah Bis <marith.se@gmail.com>
Date Thu 11/14/2024 2:45 PM
To health@townofhudson.org <health@townofhudson.org>; Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,
My name is Sarah Bis and I am a resident of Hudson, MA at 20 Orchard Drive. I am writing regarding concerns for the impact of expanding the current Hudson Solid Waste Transfer Station at 300 Cox St. My daughter is currently a kindergartener at Mulready Elementary School at 306 Cox St, which abuts the transfer station. My young son will also attend this school when he turns 5. The odor and noise of the existing transfer station is already quite disruptive to outdoor activities at the elementary school, including student drop off and pick up, recess, physical education, and other recreational use of the school fields and playground. I have yet to personally experience this on the hottest days of June, but I expect it will be unpleasant. Many of the programs for students with special needs in our town are served at this location. In addition, I am concerned about the traffic and air pollution that will result from an increase in the number of large trucks on the road where children are walking to and from school. Increasing the size and amount of trash that the transfer station manages by 1600% will have a strong noticeable impact on not only the health and safety of children on our community. Please help me safeguard the health of my children and their ability to access a free and appropriate public education in my community by opposing expansion of this facility.
Respectfully,
Sarah Bis

Outlook

Fwd: Opposition to Expansion of Hudson Transfer Station

From Katie Cunningham <k8e.cunningham@gmail.com>
Date Fri 11/15/2024 8:48 AM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

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Dear Nicholas Moreno,
I am writing to express my strong opposition to the proposed expansion of the Hudson transfer station. Unfortunately, I couldn't get the "comments" button to populate in the "actions" portion of the grid on the MEPA site, so I am emailing you and asking if you can attach my comment to the open comment period.

As a concerned resident of Hudson, I am deeply troubled by the potential negative impacts this expansion will have on our community, particularly on the health of our children and the environment.

Environmental Justice Concerns:
The proposed expansion will disproportionately impact the health and well-being of residents in a community less affluent than its neighboring towns (from whence the garbage will come). The increased truck traffic, noise pollution, and air pollution will significantly degrade the quality of life for families living nearby. Given the high population of recent immigrants, ESL learners, and the more disparate socioeconomic brackets in this town, I believe this project fails to meet the principles of environmental justice, as it places an undue burden on a vulnerable population. Furthermore, at the elementary school that this project will abut, there is a dedicated program for children with autism. Exposing this vulnerable population to to both the toxins implicit in the project as well as the increased sensory input inherent in the expansion is unfair.
Public Health Risks:
The expansion will lead to a substantial increase in diesel truck traffic, resulting in higher levels of harmful air pollutants. These pollutants, such as particulate matter and nitrogen dioxide, have been linked to serious health problems, including respiratory illnesses, heart disease, and cancer. Children, the elderly, and individuals with pre-existing health conditions are particularly vulnerable to the adverse effects of air pollution.
Ecological Impacts:
The proposed expansion site is adjacent to the Assabet River, a vital waterway that has undergone significant restoration efforts. Increased truck traffic, potential spills, and runoff from the expanded facility pose a significant threat to the river's water quality and ecosystem. This could harm aquatic life, disrupt the delicate balance of the ecosystem, and undermine the progress made in restoring the river.
Community Disruption and Quality of Life:
The expansion will disrupt the peaceful character of town leading to increased noise pollution, traffic congestion, and safety hazards. The constant influx of heavy trucks will negatively impact the quality of life for residents, particularly those living near the facility.
This project benefits the residents of the Commonwealth minimally and private enterprise maximally, at the expense of the health of our residents and our community.
I urge MEPA to carefully consider the potential negative impacts of this proposed expansion and reject the project.
Thank you for your attention to this important matter.

Sincerely,
Katie Cunningham
5 West Ave
Hudson, MA

* https://decodingbiosphere.com/2023/04/25/the-causes-and-effects-of-air-pollution-a-comprehensive-guide/
* https://www.studocu.com/vn/document/truong-dai-hoc-khoa-hoc-xa-hoi-va-nhan-van/quan-he-quoc-te/air-pollution-is-a-significant-concern-in-vietnam/85155501

Outlook

Public Comments Against BP Transfer Station Expansio

From Alicia Smith <smith.alicia@gmail.com>
Date Mon 11/18/2024 4:24 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Nick!
Thank you for taking our public comments on the BP Transfer project. I am a parent of a student at Mulready Elementary School and an abutter to the Dump. I am writing to express my concerns about the expansion of the BP Transfer station.

From my initial research/convos, the expansion has very little to no benefit for the people of Hudson. For the below reasons, I am against the expansion.

1. The dump is looking to increase its ability to receive garbage by 242%, which is 1700% of what Hudson needs for its own garbage disposal. This would bring in trash from all surrounding towns.
2. Hundreds of more trucks barreling down the narrow roads, more smell, more trashwater on the roads coming home to your garage (yes, this is an actual problem).
3. Since BP pays pennies on the dollar to lease the land from the town, the expansion wouldn't solve our current budget issues, and we'd STILL have to pay for the wear and tear on the roads (they are abysmal due to these trucks already).
4. We'd still have to pay for trash pick up!
5. The scariest aspect is the increased threat to the safety of the children and pedestrians walking to Mulready Elementary. The huge trucks already fly down narrow Cox Street and surrounding streets cutting over to the transfer station. More trucks = more traffic = more accidents.
6. The most vulnerable population in Hudson (PreK-4th grade) already has polluted air on their only sports field. It absolutely STINKS when you go outside. And yet they breathe it in consistently all day while playing on the field or playground. I can't imagine 1700% more trash. Yes, the new proposal has a "misting system" to keep the smell down. Do we have this now?
7. Trucks will be driving through wetlands to get to the expanded area. It's adjacent to Assabet land and now drainage may be an issue (we already have enough superfund waste sites in our town that we're paying to rectify).
8. Not to mention the noise pollution and actual trash that is covering the sidewalks already from trucks dropping trash as they drive by. The homeowners deal with it every day and the town has to pick it up.

Don't turn Hudson into everyone else's dump!

Gratefully,

Alicia Smith

24 Zina Road, Hudson MA

978-204-1554

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16586	--	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-18-2024	--	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-22-2024	--	--	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	--	--	

Comment Title or Subject

Topic: Wetland Protection

Comments

Segoe UI | 10 pt | Paragraph

I don't see how this plan can even be permitted since the proposed access road cuts through the wetland and is well within the 25 foot no disturb bylaw of Hudson. What protections will be there from trash ending up in both the wetland and the assabet from the facility.

Attachments

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Outlook

Comment on Project ID number 16586, Hudson Solid Waste Transfer Station

From Jaime L. Olivo <jaimelynnolivo@gmail.com>
Date Mon 11/18/2024 12:57 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

As a long time resident with children in Hudson Public Schools, including the school next to the transfer station, I am not in favor of increasing the amount of waste at this transfer station. I am concerned with the traffic, large trucks, and the smell that I have witnessed myself when dropping off my child. Hudson has been building new residences and townhouses and should also invest in infrastructure to support them. Thank you.
Jaime Olivo

Outlook

Dump expansion

From Michelle Bernier-Capaldo <michellebernier@gmail.com>
Date Mon 11/18/2024 5:14 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello!

I am writing to express my concerns about the expansion of the BP Transfer station in Hudson.

From my initial research/convos, the expansion has very little to no benefit for the people of Hudson. For the below reasons, I am against the expansion.

1. The dump is looking to increase its ability to receive garbage by 242%, which is 1700% of what Hudson needs for its own garbage disposal. This would bring in trash from all su
2. Hundreds of more trucks barreling down the narrow roads, more smell, more trashwater on the roads coming home to your garage (yes, this is an actual problem).
3. Since BP pays pennies on the dollar to lease the land from the town, the expansion wouldn't solve our current budget issues, and we'd STILL have to pay for the wear and tear
4. We'd still have to pay for trash pick up!
5. The scariest aspect is the increased threat to the safety of the children and pedestrians walking to Mulready Elementary. The huge trucks already fly down narrow Cox Street ar
6. The most vulnerable population in Hudson (PreK-4th grade) already has polluted air on their only sports field. It absolutely STINKS when you go outside. And yet they breathe i
7. Trucks will be driving through wetlands to get to the expanded area. It's adjacent to Assabet land and now drainage may be an issue (we already have enough superfund waste
8. Not to mention the noise pollution and actual trash that is covering the sidewalks already from trucks dropping trash as they drive by. The homeowners deal with it every day an

Help us prevent Hudson from turning into everyone else's dump!

Gratefully,

Michelle Bernier-Capaldo

22 Worcester Ave

508 954 5887

--
Michelle Bernier-Capaldo
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Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16586	Sushma	9 Elaine Circle	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-18-2024	Singh	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-22-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	sushma01749@hotmail.com	01749	

Comment Title or Subject

Topic: Vehemently oppose the above proposal

Comments

Segoe UI | 10 pt | Paragraph

Hello ,

I am a long time resident and live close to,the current transfer station location. This proposed expansion is very concerning to me and my community. There's an elementary school near by and we can't go to the school's playground and soccer's field without smelling a foul odor. I am a resident on the near by street , by fire station and on my walks during summer time , I had to hold my breath from school to fire station. I am deeply concerned about the environmental effect this proposal will have on the health of the community. Not to mention , the wear and tear our roads and streets will have to bear while transporting these same BP trucks. I will strongly recommend a third party review of this proposal , preferably an environmental scientist to assess the effects of this proposal on the safety and health of our community. Please consider my sincere request to oppose this proposal to expand transfer station location. Thank you !

Attachments

Update Status

Status

Accepted

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Outlook

Fwd: Hudson MA Transfer Station

From Tim Porter <tporter138@gmail.com>
Date Mon 11/18/2024 8:10 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Nicholas,

My name is Tim Porter and I was trying to add comments to EEA 16586 but was unable to. Would you be able to assist with adding the below?

I live in Hudson with my wife and two children, both of whom attend Mulready Elementary school in Hudson. After hearing more about plans for the new transfer station we are extremely concerned about what is planned for the site. Below are some bullets shared by a local town member that highlights many of the pitfalls of this project.

Thanks,
Tim Porter
Resident of Hudson

- The dump is looking to increase its ability to receive garbage by 242%, which is 1700% of what Hudson needs for its own garbage disposal. This would bring in trash from all surrounding towns.
- Hundreds of more trucks barreling down the narrow roads, more smell, more trashwater on the roads coming home to your garage (yes, this is an actual problem).
- Since BP PAYS PENNIES ON THE DOLLAR to lease the land from the town, the expansion WOULDN'T SOLVE OUR BUDGET ISSUES, and we'd STILL have to pay for the wear and tear on the roads (they are abysmal due to these trucks already)
- The scariest is the increased threat to the safety of the children and pedestrians walking to Mulready. The huge trucks already fly down narrow Cox Street and surrounding streets cutting over to the transfer station. More trucks = more traffic = more accidents.
- The most vulnerable population in Hudson (PreK-4th grade) already has polluted air on their only sports field. It absolutely STINKS when you go outside. And yet they breathe it in consistently all day while playing on the field or playground. I can't imagine 1700% more trash. Yes, the new proposal has a "misting system" to keep the smell down. Do we have this now??
- Trucks will be driving through wetlands to get to the expanded area. It's adjacent to Assabet land and now drainages may be an issue (we already have enough superfund waste sites in our town that we're paying to rectify).
- Not to mention the noise pollution and actual trash that is covering the sidewalks already from trucks dropping trash as they go by. The town gets to pick that up with the infrequent street sweepers.

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16586	CINDY	5 LAFRANCE DRIVE	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-19-2024	BOLAND	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-22-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	CINDYBDB@VERIZON.NET	01749	

Comment Title or Subject

Topic: Please stop the proposal

Comments

Segoe UI | 10 pt | Paragraph

Hudson is a small community which will not benefit in ANY way from more than doubling the tranfer station's capacity. Any SMALL financial benefit will be more than offset by the cost of the added truck traffic on our roads and trash cleanup behind the trucks. The added traffic and smell will only be a deficit to the town.

Please STOP this project!

Attachments

Update Status

Status

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Outlook

Concerned about Hudson Transfer Station expansion

From Robert Burgess <bobb2001@gmail.com>
Date Tue 11/19/2024 2:27 PM
To health@townofhudson.org <health@townofhudson.org>; Kate.Hogan@mahouse.gov <Kate.Hogan@mahouse.gov>; Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>
Cc sduplisea@townofhudson.org <sduplisea@townofhudson.org>; jcongdon@townofhudson.org <jcongdon@townofhudson.org>; dbemis@townofhudson.org <dbemis@townofhudson.org>; jquinn@townofhudson.org <jquinn@townofhudson.org>; ssharek@townofhudson.org <ssharek@townofhudson.org>

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As a resident of Hudson, Mass., I am concerned about the expansion of the proposed new transfer station.

I have been at the current transfer station on Saturdays when many contractors from out of town visit to drop off their truck loads. My understanding is there are not many dumps open on Saturdays, so these trucks bring their garbage to Hudson. The line of trucks can be as long as an hour long.

I don't see how encouraging these out of town trash haulers benefits Hudson residents. Anyone who lives in the neighborhood has to deal with large trucks, loud noise, and unpleasant smells, which is especially frustrating for the elementary school students and staff next door.

With the transfer station moving nearby, why would we want to increase any of these health, safety, annoyance factors by increasing the tonnage of waste the dump can take in?

Finally, I would much rather see the new transfer station take an ecofriendly approach and increase its capacity to accept and process compostable materials. Many area towns return compost for free to their residents. In Hudson, we can drop off our leaves and grass clippings, but do not have access to the compost that should come from processing those materials. Furthermore, expanding the list of compostable materials the transfer station will accept to include dead garden plants and food waste would reduce the amount of trash going into the wastestream created by Hudson residents, while creating a valuable end product (compost) that can be used to enrich our yards, parks, and neighborhoods.

I urge you to encourage BP to think about being greener by working in a small footprint, collecting as little out of town waste as possible, and by establishing a modern day composting program. Let's think more about the environment and human wellbeing and less about how much out of town trash we can process so close to an elementary school.

Thank you,
Robert Burgess
31 Bradford Road
Hudson, MA

Outlook

Protect Hudson: Oppose BP Transfer Station Expansion

From Shira Meadows <shiracmeadows@gmail.com>
Date Tue 11/19/2024 5:22 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Moreno,

My name is Shira Meadows, and I reside near the BP Transfer Station. I am writing to express my strong concerns regarding the proposed expansion of the transfer station's tonnage capacity.

This expansion raises several issues that could significantly impact our community:

1. **Increased Traffic:** Cox Street is already heavily trafficked, and adding more trucks will only worsen congestion, making it less safe for residents, commuters, and children.
2. **Limited Access:** More traffic and longer wait times could restrict residents' ability to access the Transfer Station when needed.
3. **Environmental Concerns:** The increased garbage intake would likely intensify unpleasant odors, undermining the quality of life for those living nearby.

Allowing BP to increase its garbage intake by 242.85%—approximately 1700% of what the town itself generates—offers no clear benefits to Hudson. Instead, it creates unnecessary challenges for our community, turning our beautiful town into a dumping ground for others' waste.

I urge you to prioritize the well-being of Hudson residents by rejecting BP's proposal to increase its garbage tonnage. Let's work together to keep Hudson safe, clean, and a place we're proud to call home.

Thank you for considering my concerns.

Sincerely,
Shira Meadows

6 Edith Road, Hudson

Outlook

BP expansion

From Antonio Pires <pires24@yahoo.com>
Date Wed 11/20/2024 9:20 AM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,
I am writing to you with deep concern about the building of the new transfer station and the amount of trash trucks that will be entering our community.

I have lived in Hudson my whole life (52 years) but on broad street since 2010. the amount of trucks that come up and down this street has become ridiculous. I have a partner who works from home and has opted not to because of such heavy noise from their big trucks..

We had passed the J break law in Hudson but that doesn't seem to apply to broad st. With most of our houses on broad st being 10-20 ft from the road they shake our whole house when decelerating down Broad Street. Maybe a sign would help from using the engine break coming down the hill, or more law enforcement to monitor the busy times. The loud exhaust on these trucks is also just as bad coming up the hill with a full load. The quality of life on Broad Street has really decreased from the amount of BP trucks and trash contractors going all day. I'm not sure how much longer we can live here due to the noise pollution from these trucks on broad street.
Perhaps they should be forced to go Marlboro st which has a less impact on the residents. Just seems kind of absurd to go down Broad Street and then make the tight turn down by Main street or vila do Porto Boulevard. This is not a good trucking route.

I work in Waltham and have followed BP trucks as well as contractors from that area all the way to the BP transfer station. If they plan on increasing their trash disposal this will be a big blow to our community. The amount of trash trucks will really decrease the quality of life in Hudson. We will be a major hub for anybody looking to dispose of their trash with zero revenue for our beautiful town. This is not good for Hudson or community.

Im not sure why we even need this if we already have a trash pick up service in Hudson. If people choose to sign up for it.
Please consider us residence in our community and vote against the BP expansion. It is just not good for Hudson or its future.
Concerned resident
Tony

November 21, 2024

Nick Moreno
MEPA Analyst
nicholas.moreno@mass.gov

Nicholas,

The attached is a comment upon the "Hudson Solid Waste Station" Final Environmental Impact Report (FEIR) submitted to MEPA by Epsilon Associates on behalf of B-P Trucking under MEPA EEA #16586. Please include this as a Public Comment for the Project.

Regards,
James Carvalho
3D Autumn Drive
Hudson, MA 01749
jbcarvalho@verizon.net

Final Environmental Impact Report
EEA # 16586

Hudson Solid Waste Transfer Station and Recycling Facility

Submitted to:
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

This proposed 850 ton/day Solid Waste Transfer Station in Hudson should NOT be approved

This public comment is in response to the Final Environmental Impact Report (FEIR) prepared by Epsilon Associates on behalf of B-P Trucking and submitted to MEPA on October 15,2024.

I had previously submitted a public comment in response to the previously submitted Draft Environmental Impact Report (DEIR) back in May of this year. That prior comment is included in Section 7.0 of this FEIR. In my opinion, the issues in my prior comment remain valid concerns for this proposed project and should be part the MEPA review before approval or disapproval by Secretary Tepper. I will not be resubmitting that previous comment as I consider that the copy in Section 7.0 should be sufficient to be included in the Secretary's review of this project.

B-P Trucking has included in the FEIR their answers to the issues raised in my DEIR comment. Where, in my opinion, the B-P answers do not address the fundamental issues which I raised, I will ask again for an answer. Where, in my opinion, the B-P answers provided are insufficient I will challenge their viewpoint. I trust the Secretary will take this into consideration.

I have no insight into what is the MEPA view of the issues which I raise. You have provided no answers. I know that MEPA approval is required for this project. It is unclear to me what discretion MEPA has under 301 CMR 11.00 to deny or approve with conditions. As the Hudson public learned under the recent EEA #16585 warehouse project, Massachusetts law greatly favors business and developers, not citizens. There may be little that MEPA can do. But, I will ask.

I am not a traffic engineer or an environmental scientist. I am a resident of Hudson who is concerned about the impact of this massive expansion of our solid waste transfer station. I see this project as unfair to the Cox Street neighborhood, the adjacent Mulready Elementary School and the Town of Hudson in general. Hudson is already hosting a 350 ton/day solid waste facility, characterized as "Large", which far exceeds the level of solid waste generated in our town.

It is my hope that MEPA will deny the B-P expansion to 850 ton/day capacity for the protection of the citizens of Hudson. The current 350 ton/day certification is more than enough.

When the FEIR for EEA #16586 was officially noticed in the October 23rd issue of the MEPA Monitor, which I subscribe to, I posted that information on the local facebook group page Keep Hudson Safe & Strong https://www.facebook.com/groups/keephudsonsafe

This prompted one of the facebook group members to ask "This is going through no matter what … correct?", see above. In truth I don't know the answer to this question. My limited experience with the MEPA approval process comes from EEA #16585, the proposed mega warehouse at 75 Reed Road in Hudson. Many in Hudson opposed this warehouse as excessive in that location surrounded by two over 55 residential communities and a child care center. Various concerns prompted public comments to MEPA and our local Hudson Planning Board including traffic concerns, noise and diesel PM2.5 pollution. These same issues exist for the proposed Hudson Solid Waste Transfer Station, EEA #16586. The warehouse application under EEA #16585 was withdrawn by the proponent, Portman. There was significant opposition from citizens of Hudson to this project, however, in my opinion, Portman withdrew their speculative proposal because business conditions showed a reduced demand for large warehouses. We will never know what the final Secretary Certificate would have said for EEA #16585.

I used the MEPA "Search" tool to find another 119 Solid Waste Transfer Station projects reviewed by MEPA. In particular I found EEA #16236 in 2020 which requested the doubling of the ton/day capacity of the Northbridge solid waste transfer station. MEPA characterized this expansion as "minor" and it was approved "*Pursuant to the Massachusetts Environmental Policy Act (MEPA) (M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00)*". Also "*Conclusion The ENF has described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on a review of the ENF and comments received, and in consultation with State Agencies, I have determined that an EIR is not required. The project may proceed to permitting.*" I also noted that on online search showed MEPA denied in 2004 a solid waste transfer station in Brockton, Champion City Recovery, in part because "the company did not supply sufficient information about traffic safety around the site and the facility's effect on air quality." MEPA Permitting SW05 and SW06 only asks for an anticipated or proposed solid waste capacity.

My conclusion is that MEPA may approve or deny or approve certification with reasonable conditions based upon review of the impact and mitigation measures.

An UNFAIR burden on Hudson:

At the April 24, 2024 zoom public presentation of the Hudson Solid Waste Station project, B-P representative V.P. Gary DePaolo noted that the solid waste generated by Hudson is estimated at 50 ton/day. The balance of the 350 ton/day capacity which is currently approved for this transfer station comes from other sources. Some of this excess solid waste comes from neighboring, and much wealthier, towns like Sudbury and Wayland. Look at this comparison of median family income.

Rank	Municipality	Type	County	Per capita income	Median household income	Median family income	Households	Population
149	Hudson	Town	Middlesex	$48,829.00	$94,191.00	$129,472.00	8,035	20,032
5	Sudbury	Town	Middlesex	$96,008.00	$217,847.00	$228,426.00	6,208	18,912
26	Wayland	Town	Middlesex	$89,947.00	$203,789.00	$234,051.00	4,779	13,859
31	Stow	Town	Middlesex	$88,285.00	$111,701.00	$144,861.00	5,573	7,130
85	Northborough	Town	Worcester	$62,946.00	$129,780.00	$161,601.00	5,821	15,863
99	Maynard	Town	Middlesex	$55,372.00	$112,432.00	$147,701.00	4,269	10,702
101	Berlin	Town	Worcester	$55,248.00	$106,908.00	$121,182.00	1,311	3,326
113	Bolton	Town	Worcester	$66,748.00	$167,132.00	$191,434.00	1,853	5,606

https://en.wikipedia.org/wiki/List_of_Massachusetts_locations_by_per_capita_income

The median family incomes in these surrounding towns is twice that in Hudson. Further consider the property values in these neighboring towns, also twice that in Hudson.

City/Town 2022 median home price

Hudson $550,750

Sudbury $1,150,000

Wayland $1,047,000

https://www.bostonmagazine.com/property/single-family-home-price-chart-2023/

The neighboring town of Sudbury just opened their $28.8 million 51,000 square foot net zero ready Fairbank Community Center with an 8 lane pool, fitness room, gymnasium with volleyball/basketball etc. The Lincoln-Sudbury High School ranks near the top 1% of high schools in America. In contrast, Hudson is facing a struggle to maintain level services in our school system and will see severe cuts to all schools if the expected 2.5 tax override vote does not pass next Spring.

Approval to expand the Hudson transfer station to 850 ton/day capacity will invite more wealthier towns, Lincoln, Weston etc. to send their waste to Hudson.

The Hudson Select Board tries hard to keep our real estate tax rate down. There is a trend in Town to establish public-private partnerships to offload municipal services from the annual budget. As a result Hudson has for-profit companies run our waste water treatment plant, our ambulance service and our transfer station. While it may argued that this approach provides some efficiencies and lowers direct cost to the Town, it is unlikely that a municipally run solid waste transfer station would be petitioning to expand the facility certification so that they can import more garbage from surrounding towns.

All of the benefits listed in the FEIR can be made available to Hudson with a modern solid waste facility certified for the current 350 ton/day capacity, alas, but less business for B-P Trucking.

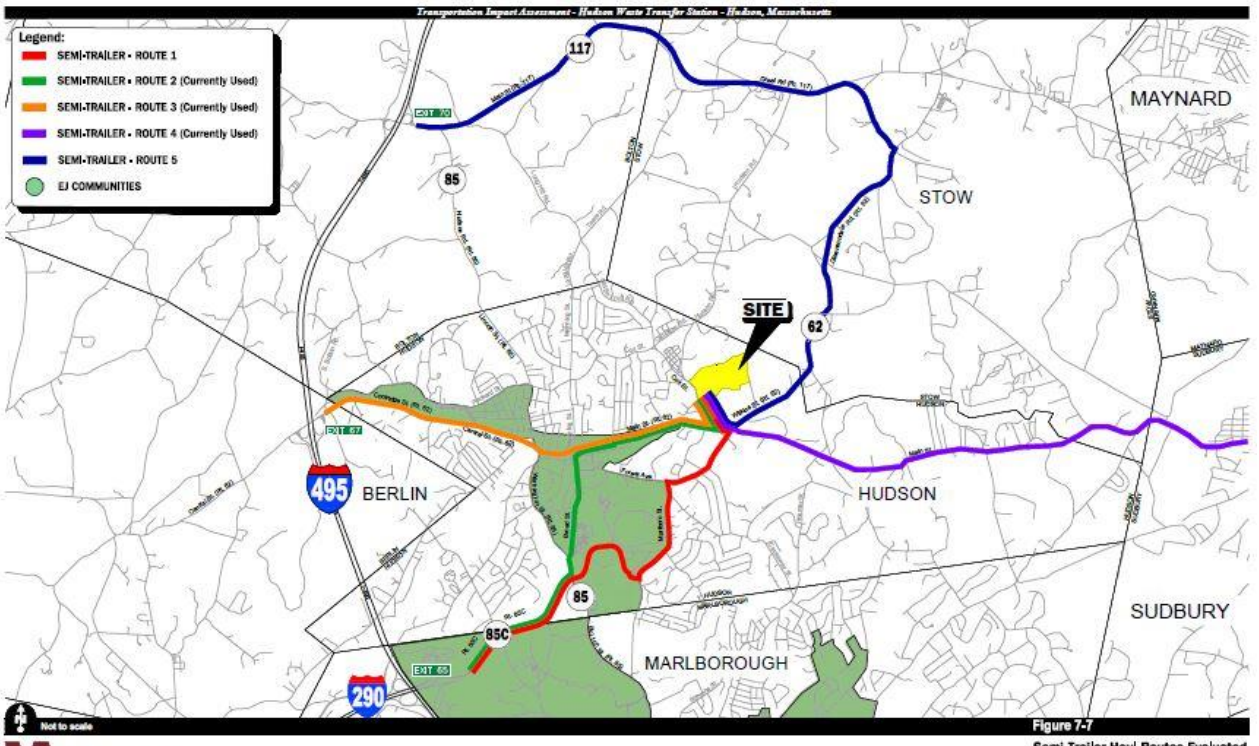
It is unfair for MEPA to approve this expansion to 850 ton/day capacity, making Hudson the regional solid waste center for wealthier towns who do not share this burden. The current 350 ton/day capacity is enough.

JC.2

"*The Proponent is not aware of any requirement to conduct additional traffic monitoring*, " Noted that under the proposed large warehouse facility in Hudson, reviewed by MEPA under EEA # 16585, that Proponent, Portman, did agree to conduct traffic monitoring "…. including monitoring 6 months after occupancy and one year after occupancy". That warehouse Proponent agreed as part of the Planning Board Site Plan Review to provide this study as a reasonable confirmation of the actual traffic impact which was estimated in the project filings. For that project the site plan review preceded the MEPA review.

The scale data would be only one step in the confirmation of traffic impact. Traffic monitoring along each of the major proposed Routes identified in the DEIR, or whatever routes the truck choose to take, will confirm not only the magnitude of traffic impact via scale data but the actual impact of large trucks on the roadways in Hudson. This is especially important in light of the disclosure in the FEIR that "With respect to third-party customers visiting the proposed facility with packer trucks, roll-off trucks, and smaller vehicles, B-P will have no control over the routes these customers choose to take….".

In case MEPA does not have jurisdiction to require this study perhaps the Hudson Planning Board will make this a requirement in their Site Plan Review, whenever that happens.



JC.3

The intent of this public comment may not have been clear. It is a concern about the wear upon the roadways in Hudson due to the large increase in heavy truck traffic.

Semi-trailers from the transfer station loaded could weigh as much as 80,000+ pounds (30,000 to 35,000 pounds empty with up to 55,000 pounds, 25 tons, solid waste bales) and there would something like 34 of these leaving the transfer station every day. Smaller rear/side/front load and roll off solid waste trucks may have empty weight approaching that of a semi-trailer depending on their capacity (i.e. 18,000 to 35,000 empty). Something like 260 of these truck trips arriving at the transfer station to deliver the 850 tons of solid waste could carry an average of about 7000 pounds of solid waste each. These are rough estimates. Heavy trucks such as these increase the wear on roadways far above that of passenger vehicles and will predictably reduce the useful life of these roadways before maintenance is required. The axle weight formula in the DEIR public comment predicts the equivalent wear compared to a passenger car based upon axle weight. It's from an old study. Depending upon the quality of the roadway the wear on pavement due to these heavy trucks may be more or less. The pavement maintenance cost which results from this transfer station traffic will be a burden on Hudson DPW budget. It could be significant increased cost to the taxpayer in Hudson. That is why an analysis of the impact of the transfer station traffic on Hudson roadways is important.

The FEIR response reads "*A pavement impact analysis is conducted when the existing pavement structure shows evidence of failure due to truck traffic. No such damage was identified within the study area.*" Perhaps the technical term "pavement impact analysis" is inappropriate. What Hudson needs to know is how much the pavement structure will be damaged as a result of the traffic from the transfer station, how much this will reduce the useful life of our roads.

In 2017 the Hudson Department of Public Works issued a Pavement Management Study. This report was prepared by Vanasse Hagan Brustlin of Watertown, MA, which may be the same firm who contributed to the FEIR Traffic Impact Analysis. In this report it states "*Pavement management is the practice of planning for pavement repairs and maintenance with the goal of maximizing the value and life of a pavement network.*"
https://www.townofhudson.org/sites/g/files/vyhlif3281/f/uploads/townwide_pavement_study.pdf
The 2017 Study didn't wait for "evidence of failure" because our DPW needs to plan for and budget for pavement repairs and maintenance. It's just good management.

The FEIR says "No such damage was identified within the study area." It is unclear in this reply how much actual investigation was done to support this statement. There are many roadways in

Hudson now which have asphalt crack filler repair. The crack filler may be an indication that a more extensive maintenance and capital cost expense will be need in the near future.

It is of no consequence that Cox street was recently repaired. That was part of Hudson DPW Director Eric Ryder's plan. What is of consequence is how long will that new pavement last considering the increased heavy truck traffic resulting from the proposed 850 ton/day expansion of the transfer station. Eric may be planning for that section of Cox Street to last 20 years before maintenance is needed. But, for example, the increased heavy truck traffic may make repair necessary after only 7 years. That would be an impact to Eric's Capital Paving Plan and an unanticipated expense to the Town. This goes for all of the roadways in Town, including state highways, on the proposed truck routes for the proposed transfer station.

If the Vanasse and Associates listed in the FEIR is the same as the Vanasse firm which did the 2017 report for the Hudson DPW, they would be a unique resource to evaluate the impact of an expanded transfer station.

MEPA must require B-P Trucking to provide a study of the pavement impact for all Hudson roads on the proposed travel routes for the transfer station due to the heavy truck traffic from the transfer station as a requirement of approval of this project.

JC.4

Rodent Information & Reporting

Have you seen a rat in your neighborhood? Report a Rodent Sighting

How We Can Work Together to Prevent Rodents

Rats have been a part of the Massachusetts ecosystem since the area was originally settled in the early 17th century. They are commonly found in most urban areas and increasingly in suburban areas like Hudson. Neighboring communities, such as Marlborough, are also seeing an increase in rats. However, they are only present because of human activities, and thus it is possible to reduce their numbers by working together as a community to modify our habits.

https://tinyurl.com/2fa58zfp

Hudson has seen a big increase in rats recently. To address this the Hudson Health Department now has established an online rodent sighting mechanism. It is a serious concern. Parents who send their children to the Mulready Elementary School are going to be concerned about this risk of an expansion to 850 ton/day of solid waste, justified or not. As a matter of good community public relations B-P Trucking should provide the relatively small cost to extend extermination services to the neighboring Mulready School to assure these parents that this proposed expansion will not put their children at risk.

If MEPA does not have the jurisdiction to require this protection for the Mulready School, then perhaps the Hudson Health Department/Board of Health should do so. Board of Health approval is required for this project. This so-called "minor" expansion of the Hudson Solid Waste Transfer Station first came up at a Hudson Board of Health meeting on Monday November 18. No one from B-P was present at this meeting. There will be a public comment period on the project sometime in December and a public hearing scheduled sometime in January. B-P needs to be there, with good answers.

https://www.facebook.com/HudsonBOH

JC.6

"the Amazon project application (EEA #16585) has been withdrawn. Should that project or any other proposal for that site come forward, the proponent for that project will be required to prepare a new traffic study, which would need to incorporate traffic projections for both the proposed transfer station and the 75 Reed Road development."

The new owner of the Intel property off Reed Road, National Development, is currently in process of marketing that property for development and that development will potentially coincide with the completion of the proposed transfer station. The potential of a massive increase in traffic on the proposed transfer station Route 1 from the former Intel remains. This concern came up at the Hudson Planning Board site plan review of a new Dunkin' location down the street at the intersection with Washington Street. That will be a minor impact compared to the potential traffic from the former Intel property and still that coincidence became a concern for site plan approval of the Dunkin' project. Diesel Truck traffic on transfer station Route 1, on Reed Road, has already raised concerns in this neighborhood regarding the noise created by the use of truck engine brakes, enough so that a citizen petition at Hudson Town Meeting this near resulted in a new engine brake noise bylaw. The warehouse project has raised a level of sensitivity to more traffic by the abutters in that area of town.

B-P should de-emphasize the use of Route 1 for transfer station traffic.

JC.8

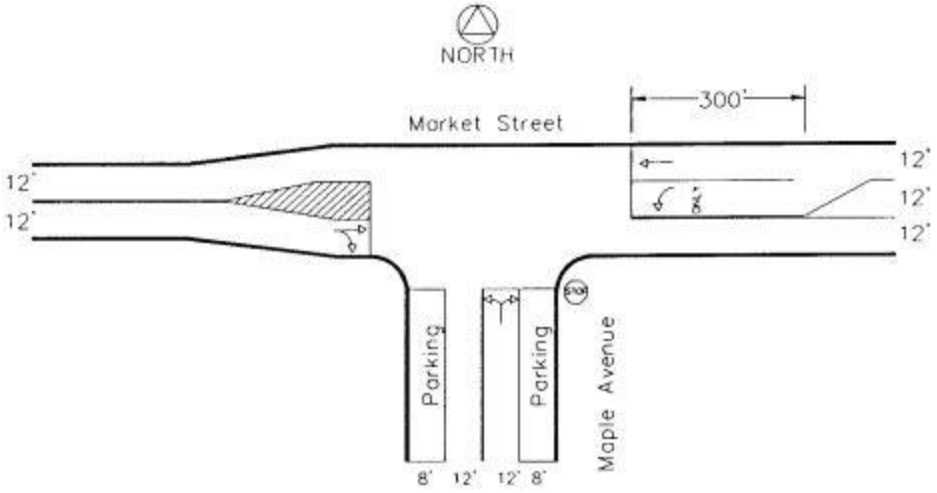


Figure A-9. Case Study 3: Existing intersection geometry (not to scale).

The intent of this public comment may not have been clear. It is a concern about safety at the intersection of the proposed transfer station driveway on Cox Street and not the inconvenience of travel delays for traffic at peak times during the day.

The warrant analysis described in the FEIR according to the National Cooperative Highway Research Program (NCHRP) sounds impressive but the public can not be expected to have a background to evaluate the detail of that analysis.
https://onlinepubs.trb.org/onlinepubs/nchrp/esg/esg.pdf

Warrant analysis in NCHRP Report 457 is based, in part, upon "Historic Data" for an existing intersection. The proposed driveway to the proposed Hudson Solid Waste Transfer Station doesn't exist. There is no historic data, crash data, for this intersection and there won't be significant, unusually frequent crash, data for years. The warrant analysis can not be complete without this data.

As observed in the drawings included in this DEIR comment large trucks and in particular tractor trailer trucks do not turn like passenger cars and will encroach upon other travel lanes if the intersection is not wide enough. Large trucks and in particular tractor trailer trucks do not accelerate cross travel lanes. The proposed solid waste transfer station intersection design has to take truck turn dimensions into account. A wider roadway, a dedicated left turn lane, should make left turns at the intersection safer.

In the B-P response to public comment JC.2 in the FEIR it reads "*the typical weekday afternoon peak hour for adjacent roads usually occurs between 4:00 PM and 6:00 PM. In contrast, the critical traffic activities for the existing facility peak around midday, between 12:00 PM and 2:00 PM, when adjacent roads are not typically burdened with heavy traffic volumes."* That fact would reduce the inconvenience of delay to peak hour traffic. But, that facility peak more closely coincides with the traffic associated with the Mulready Elementary School, school busses, parents picking up their children, children walking home from school.

Hudson Public Schools Elementary School Hours & Curriculum

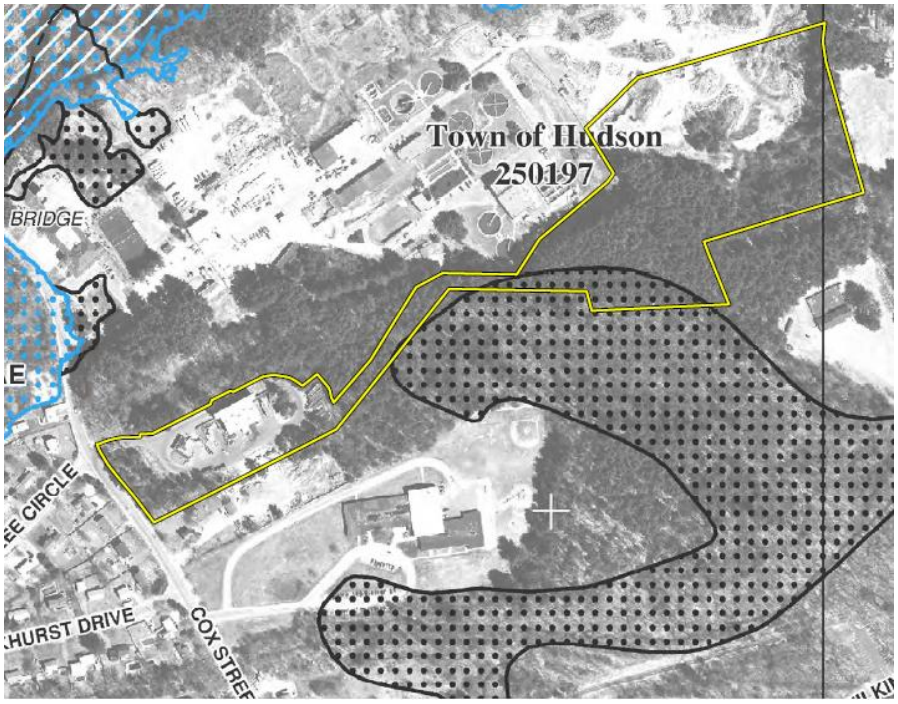
Elementary School Hours

All Hudson Elementary Schools
8:20 a.m. – 8:35 a.m. Student Arrival
8:20 a.m. – 8:40 a.m. Breakfast Available
8:35 a.m. Starting Time
2:55 p.m. Dismissal (11:45 a.m. Early Dismissal)

The B-P Trucking FEIR conclusion is nothing special is needed at the site driveway. Now is the time to evaluate this intersection for safety not after it is apparent from historic data.

This is a further reason why a peer review by subject expert professionals should be done for the public to have confidence in the conclusions given in the FEIR. MEPA must require a peer review of this intersection as a condition of approval.

JC.9



The intent of this public comment may not have been clear. It is a concern about the health of young children, aka sensitive receptors, at the nearby Mulready Elementary School.

The lungs of these children are still developing. PM2.5 particulate matter is fine "inhalable" particulate matter less than 2.5 microns in diameter. Concentrations of PM2.5 from diesel trucks can impact long term health. PM2.5 can cause devastating health impacts including asthma, chronic obstruction pulmonary disease (COPD), cancer and premature death. PM2.5 can penetrate deeply into the lungs to irritate and corrode the lung wall. Some PM2.5 particles are small enough to pass through lung tissue into the blood stream. Living within 500 feet of a diesel truck highway has been identified as a risk factor for respiratory and cardiovascular problems, a "diesel death zone".

A longer driveway and a big increase in diesel traffic means more PM2.5 emissions. Massachusetts has an "anti-idling" law which limits unnecessary engine idling to five minutes. https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXIV/Chapter90/Section16aIn
The penalty for violating the anti-idling law is a fine of up to $500 for each offense after the first, and a fine of up to $100 for the first offense. The law also restricts unnecessary idling in school zones (within 1000 feet from the grounds of Mulready School). Mass DEP won't be enforcing this law. Hudson Police have authority to enforce but they won't be doing that either. It must be a B-P responsibility to enforce the MA idling law. According to the FEIR Section 3.2.1.3 *"Therefore, the total time to fill a trailer and replace it with an empty trailer is approximately 20 minutes. For both C&D and MSW trailers loads, the weight of the load typically averages 25 tons."* for each of the two pits in the plan. In case B-P allows these trailers to idle for 20 minutes while loading that will exceed the state idling law. Without a coordinated arrival management plan trailers will queue up behind the trailers being loaded along this long driveway and these waiting trailers may also be idling thus extending their anti-idling violation. 40 trailers, all violating the anti-idling law, would incur a $20,000 per day fine. Additional trucks delivering solid waste to the facility, offloading and queuing up behind them,

can also contribute to anti-idling violations. B-P Trucking must have a plan for compliance with the state anti-idling law. Compliance with Massachusetts law will lower the PM2.5 emissions which might impact children at the Mulready Elementary School. The plan must include posting signage about idling. Potentially B-P might furnish block heater connections at each diesel truck loading bay to keep diesel engines warm in order to reduce idling. Eventually the transition to fossil-free vehicles will eliminate this diesel pollution. MEPA must require this anti-idling concern to be addressed.

The FEIR reply says "Air quality in the vicinity of the Project Site is generally good, with all local background concentrations found to be well below the NAAQS". The validity of this statement must be challenged because it is based upon data collection at the air quality station in Worcester some 16 miles away and a theoretical Mesoscale Analysis based upon emission trends. This will be of small comfort to the parents who send their young to the Mulready Elementary School.

The FEIR says "The Mulready Elementary School, which is the closest school to the Project Site on Cox Street, has an asthma prevalence rate of 10.3%, which is lower than the state rate of 12.2% and is in the 39th percentile for the state." This statement in the FEIR is irrelevant. Irrelevant today for the child at Mulready Elementary School who has asthma. Irrelevant for MEPA to certify a facility which has 20 years remaining on the current land lease with a facility estimated to have a 60 year life expectancy. The children (and possibly the grandchildren) of current Mulready School students could potentially be impacted by this MEPA approval decision.

Mulready parents want to know that the air quality at their child's school is safe, not theoretically safe, measured safe. That's what they will want to know at the upcoming Board of Health Public Hearing in January. MEPA suggested that the proponent mitigate the loss of trees which will be removed when the proposed facility is constructed. B-P has offered to donate $50,000 to offset the carbon capture loss of those trees. The cost of on site air quality measurement is far less. Purple Air of Draper, Utah, for example, offers a complete air quality monitor for $299 which can provide measurements via WiFi or log them to a micro-SD card. The cost to B-P Trucking would be to install a low cost air quality monitor and to have a B-P employee periodically report the measurements to the Hudson Board of Health. https://www2.purpleair.com/products/purpleair-zen

PurpleAir Zen Air Quality Monitor

58 reviews

$299.00

The PurpleAir Zen is the latest air quality monitor from PurpleAir, measuring real-time PM2.5 concentrations for residential, commercial, or industrial use. Containing a full-color LED ring, the resulting glow indicates real-time air quality at a glance, whether used indoors or out. Built-in WiFi enables the air quality monitor to transmit data to the real-time PurpleAir Map, where it is stored and made available to any smart device.

Double tap to adjust the brightness of the highly visible multi-colored LED ring, allowing quick air quality identification from across the room. Uncluttered and attractive, this indoor or outdoor monitor provides you and your family with industry-leading performance in measuring PM2.5 pollutant levels in or around your home.

For locations with limited WiFi access, the PurpleAir Zen PM2.5 measurement device incorporates real-time clock and SD card capabilities, allowing the sensor to record and store data on a microSD card.

MEPA (and the Hudson Board of Health) must make PM2.5 diesel emissions reduction a requirement for approval. Evidence of this reduction can be confirmed by ongoing low cost, on site, air quality measurement equipment which must also be a requirement for approval.

There needs to be a peer review of the Vanasse and Associates Traffic Impact Report (TIA). This not disrespect for the work which Vanasse has provided but, like a second opinion for an important medical decision, a peer review provides an additional perspective on the options for this proposed transfer station.

The TIA provided is a complex technical study. The average citizen doesn't have the training to evaluate this complex report. Perhaps MEPA (and the Hudson Planning Board, other Boards) doesn't have that expertise either. A peer review by a professional traffic engineering company can provide additional options and potentially lead to a more informed decision for those who approve or disapprove.

On EEA #16585, the Intel warehouse project on Reed Road in Hudson, which was withdrawn, there were peer reviews of traffic, stormwater and noise impacts. It took a professional traffic engineering company, Muller Associates to question the TIA for the project by Howard Stein Hudson based upon a warehouse according to ITC LUC150 "a standard warehouse" when clearly the site plan presented a warehouse configuration which more properly be characterized as a LUC 155 "fulfillment center" or as a LUC 156 "parcel hub", configurations which would generate 2 to 3 times the diesel truck traffic as the LUC 150 traditional "warehouse". Citizens couldn't do that.

It's also a manner of presentation which if not clear to the public which may lead to misunderstanding. Take for example the total trips presentation in the DEIR.

Land Use	AM Peak Hour[4] (8:00 – 9:00 AM)			PM Peak Hour[4] (12:00 – 1:00 PM)			Weekday ADT[5]		
	IN	OUT	TOTAL	IN	OUT	TOTAL	IN	OUT	TOTAL
Existing Waste Facility Trips									
TMC May 25, 2022 (350 TPD)[1]	54	48	102	49	48	97	374	380	754
Proposed Waste Facility Expansion									
Proposed Expansion Inbound Trips[2]	43	43	86	15	15	30	185	185	370
Proposed Expansion Outbound Trips[2]	2	2	4	2	2	4	22	22	44
Proposed Employee trip Increases[3]	0	0	0	0	0	0	17	17	34
Proposed Expansion Total Trips	45	45	90	17	17	34	224	224	448
Waste Facility Total Trips									
850 TPD	99	93	192	66	65	131	598	604	1,202

An uninformed citizen might see this chart and compare 754 total trips for the currently certified 350 ton/day transfer station and compare this to 1202 total trips for the expanded 850 ton/day transfer station as a 59% increase, not so bad. That chart doesn't break out the distribution of trash trucks (inbound), semi-trailers (outbound) and citizen recycling trips today. Presented differently this table might show that diesel traffic based upon the certified capacity (850/350) is more like a 240% higher number of heavy diesel truck trips impacting the roadways and citizens of Hudson.

MEPA and/or the Hudson Planning Board must require professional peer review for all the major issues presented in the plan for this increased capacity transfer station as a condition of any approval.

Outlook

Comment from Hudson resident

From JSM 21 <millardjeanette@gmail.com>
Date Thu 11/21/2024 1:57 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Re: Solid Waste Station Final Environmental Impact Report (FEIR)" submitted to MEPA by Epsilon Associates on behalf of B-P Trucking under MEPA EEA #16586. Please include this as a Public Comment

Hello,
I was happy when I first learned that B-P was getting an upgrade for a larger waste transfer facility. I work in the recycling area that is part of the larger space.
Recently I learned that the upgrade is now an expansion that will nearly triple the size and, more importantly, the capacity that trucks (and not just trucks from Hudson) will be able to bring to the transfer station. This includes huge trucks hauling construction debris from distant towns, in addition to just Hudson residents.
This increase in size, tonnage, and trips per day will have a significant impact on Hudson - we are not a huge town or city, we are a relatively small town of just under 20,000 people. Our roads are not built like highways that can tolerate huge trucks with heavy weight, And our neighborhoods will certainly be less safe with behemoth trucks thundering down the town's roads.
While it is true that there is one road (Cox St) that connects fairly directly to highway 495, we cannot make that route mandatory. So all the other small, windy roads will also be at the mercy of the truck traffic, increased noise, and safety concerns that will come with such a large expansion.
I attended an early presentation about this B-P expansion. Much was made of the building planned, and the shoddy state of the current building. All true. But from what I heard and read, there was never anything specific stated in the public forum about almost tripling the tonnage that is being proposed.
Please look carefully, not just at what Hudson's "business friendly" SelectBoard wants, but also what makes sense for our town and the residents. At a time when we are working hard to reduce pollution, crowding, and traffic - all contributing negatively to our carbon footprint - I think we need to scale back this business proposal in favor of something more fitting to our town.
Thank you very much for considering these concerns.
Jeanette Millard
Hudson MA

Jeanette Millard

Green Hudson
Threshold Choir
Westford Community Rowing
(she/they)

"If I cannot fly, let me sing."
~ Stephen Sondheim

millardjeanette@gmail.com
(1+) 617-513-5123
(she/they)

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16586	L J	16;Welsh Street	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-21-2024	Strz	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-22-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	ljstrz15@yahoo.com	01749	

Comment Title or Subject

Topic: Hudson transfer station

Comments

Segoe UI | 10 pt | Paragraph

This is not a necessity for the town, there is overbuilding & local streets that cannot handle increased tractor trailer traffic. The towns drinking water supply has already been compromised by the incompetence of town officials. Building a larger regional trash facility in such close proximity to the Assabet River is a risk that future generations do NOT need to have their health & the overall health of the town subjected to. Instead of unnecessarily raping the land for minimal monetary gain, the town should be concerned with the overall health of the of the town's natural resources & not risk further pollution & contamination.

Attachments

Update Status

Status

Accepted

SUBMIT

Share Comment

SHARE WITH A REGISTERED USER

BACK TO SEARCH RESULTS

November 21, 2024

Rebecca L. Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Ms. Tepper:

We are 37 year residents of Hudson, MA, and *we would like to register our objection* to the proposed expansion of the Hudson Solid Waste Station: **MEPA EEA #16586**

We fully agree with comments already made by Mr James Carvalho, Mr McCormack, and Mr & Mrs Lalli.

Our major concerns and observations:

Increased truck traffic through residential area an schools. The transfer station location is already poor to begin with. The location is on the opposite side of the town from I-495. To significantly expand the site as proposed will force 400+ additional truck trips per day through populated residential areas and schools. That makes no sense in so many ways. This brings air pollution, noise pollution, wear and tear on town roads, increased risk to cars, bicycles and people walking along the routes.

We find it extremely disappointing to see comments stating that the air quality is so good that additional pollution is acceptable. The goal isn't bring the air quality down as close as possible to the threshold of acceptability. Our state mandate says the opposite. Noise pollution is also of great concern. Although signs have been posted along Reed Road not to jake-brake, this practice continues and it is near impossible to enforce.

A large "super facility" as proposed, should be placed away from residential areas near major highways. The proposed Hudson "super facility" is in the worst possible place.

Hudson residents successfully prevented the building of a warehouse off of Technology Drive for many of the same objections stated for this project. It's time we stop have hundreds additional of trucks aiming for Hudson. We need Hudson to be a safe and healthy place to live. (We hope proposals to dramatically increase truck traffic through Hudson is not becoming a pattern.)

Please say NO to this project!

Thank you for your consideration.

Sincerely,
Per and Lena Gyllstrom
34 Otsego Drive
Hudson, MA

Outlook

Please reject the BP garbage expansion in Hudson!

From Barbara Worley <Barbara.Worley@umb.edu>
Date Fri 11/22/2024 11:59 AM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Nick Moreno,

I am writing to ask you to please reject the BP expansion in Hudson.

This would be a huge setback to our town if you approve Hudson becoming a regional dump for surrounding towns. The only benefit would be to the BP Corporation and their cronies and shareholders – not to Hudson citizens who take pride in the progress Hudson has made over the past decade, not to the families who live here, pay real estate taxes here, and raise their children here.

In 2021 Hudson won “Best Main Street in America” in a national contest, according to Richard Braga, who is the administrator of Hudson's Business Improvement District. That’s because many people here have worked hard to make important improvements to our town.

We need to keep on the right track to make our town great. A dump expansion would reverse all the progress we’ve made in attracting small businesses that are growing due to the popularity of Hudson in the Boston inside-495 region as an interesting town with nice places to eat, hiking trails, and cultural attractions to explore.

Hudson has so much going for it! Becoming one of the biggest dumps in Massachusetts is not what we want to be known for. We want to raise children who will be proud of our town’s success, not disheartened because the town let it become the regional dump for other towns. All of us in Hudson are affected by the proposal to take in other town’s garbage and become an even bigger dump site. Hudson would be set back enormously if you approve BPs proposed expansion.

Families that live in the area near the dump are already concerned about the volume of smelly garbage trucks that fly along the roads, day and night, leaving trash slop flying in the streets. Some residents have reported being nearly run over by BP’s trucks.

We have children playing outside in the polluted air around the Mulready elementary school, with the constant smell of garbage around their homes and schools, as well as the noise and exhaust fumes. There are children who walk to the elementary school in that neighborhood, and we are concerned about their health and safety.

The wear and tear on our roads would increase several times over, with even more garbage trucks ruining Hudson’s streets. The environmental impact and ecological imbalances would increase, as well.

Also, please weigh the cost to benefit ratio. Would you rather get tax money from BP, or have a nice town that's in the process of improving and attracting people here? The economic benefits are on the side of the people who live here, not BP – we don't want our property values to go down because BP wants to make us a regional dump.

And please keep in mind, numerous small businesses are making our town more attractive, and they will be contributing taxes, too. If they close down and move to a more favorable town, we lose their taxes. If we allow corporate interests to bring down our town and make it less desirable, our real estate values will plummet, and Hudson will lose the progress it's made in the past decade.

Please refuse to approve the BP expansion proposal! Please!

Barbara A. Worley
Barbara.Worley@umb.edu
Resident of Hudson since 2002
8 Shawmut Ave., Hudson, MA

Barbara A. Worley, Ph.D.
Senior Lecturer III
Department of Anthropology
University of Massachusetts, Boston
https://www.umb.edu/academics/cla/faculty/barbara_worley

Office hours: By appointment via web conferencing (Collaborate or Zoom) until further notice

Outlook

Hudson transfer station 16586

From Brianna Dalton <brianandbrianna2018@gmail.com>
Date Fri 11/22/2024 4:40 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Nicholas,

I hope this message finds you well. I am writing to formally express my deep concern regarding the proposed expansion of the dump in Hudson, MA.

As a mother of three, including a kindergarten daughter who plays outside during recess in close proximity to this site, I find the situation increasingly troubling. The unpleasant odors emanating from the dump are not just a nuisance; they raise serious health concerns.

It is frustrating to think that my daughter—and countless other children—may be breathing in harmful toxins while they should be enjoying their time outdoors at recess. Given that our town is already grappling with unsafe water conditions, it is unacceptable to further compromise the air quality with the expansion of additional waste.

I urge you to reconsider this expansion and prioritize the health and safety of our community, especially our children.

Thank you for your attention to this critical matter.

Sincerely,

Brianna Graca

Outlook

16586-Hudson SW Transfer Station Final EIR Comments

From Kasper-Dunne, JoAnne (DEP) <joanne.kasper-dunne@mass.gov>
Date Fri 11/22/2024 2:32 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Hello, Nicholas. MassDEP has reviewed the FEIR for the Hudson SW Transfer Station Project and does not have any additional comments. The FEIR adequately addressed the comments MassDEP made on the Draft EIR. As part of its permit process, MassDEP may request further information and detail from the Proponent.

Please let me know if you have any questions. Thank you and have a good day.

JoAnne Kasper-Dunne
MassDEP
Central Regional Office

View Comment

Comment Details

EEA #/MEPA ID
16586

Comments Submit Date
11-22-2024

Certificate Action Date
11-22-2024

Reviewer
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov

First Name
Julie

Last Name
Bolduc

Phone
--

Email
jules_photo@yahoo.com

Address Line 1
10 Reardon Road

Address Line 2
--

State
MASSACHUSETTS

Zip Code
01749

Organization
n/a

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Opposed to the Hudson Solid Waste Transfer Station project

Comments

Segoe UI | 10 pt | Paragraph

I am writing to express my extreme opposition to expanding the dump in Hudson. Its proximity to an elementary school, and the central location within town will have an extremely negative impact on our roads and our air as giant trucks travel through our small town.

Attachments

Update Status

Status

Accepted

SUBMIT →

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BACK TO SEARCH RESULTS

Outlook

Opposition to Transfer Station Expansion in Hudson MA

From Staines, Katherine <Katherine.Staines@childrens.harvard.edu>
Date Fri 11/22/2024 6:01 PM
To health@townofhudson.org <health@townofhudson.org>; kate.hogan@mahouse.gov <kate.hogan@mahouse.gov>; James Eldridge <james.eldridge@masenate.gov>; Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>; rep.loritrahan@mail.house.gov <rep.loritrahan@mail.house.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello!

My name is Katie Staines, and I am a parent of a student at Mulready Elementary School. I am writing to express my concerns about the expansion of the BP Transfer station's tonnage.

My child attends Mulready and I am concerned of the excess traffic on the street before, during, and after school and the disruption it will cause my student. I am also worried about the excess smell that my child will be affronted by when they go out to play on the Playground. At this point the school property already has a terrible smell as a result of the current transfer station and I cannot imagine how much worse it will get when the amount of trash collected triples in size. If they aren't working to contain the fumes now, why should we assume that their solution of adding the "misters" would be sufficient? Staff and students should be able to enjoy outside time and be able to open school windows for fresh air without a constant smell of trash or the fumes of constant garbage truck traffic. This is a public health issue.

Hudson already has a growing rat problem which has been brought to attention of the Board of Health. I believe that the construction and destroying hundreds of acres of their natural habitat will force the rats in the community, especially around Mulready. The trash at the transfer station will sustain the rats and foster growth of the population. This is a major issue.

There is no added benefit of the town to allow BP to take in extra garbage and will only cause more headaches and challenges for our wonderful community. I strongly urge that the town does not allow the transfer station to increase its garbage supply by 242.85% which is about 1700% percent of what the town uses. The town is not making any money off of this deal, and we are already paying BP to pick up our trash. We will be paying more in taxes to fix the wear and tear on our roads from the hundreds of trucks going down Cox Street on a daily basis. We will also be faced with potential pollution of our wetlands that abut the Assabet River. We are still paying off the new water filtration system from the last bad deal that Hudson made with a private company. (Precision Coating leaked PFAS into the Hudson drinking water and we were left to pay the bill for the new filtration system.)

Please do not allow the Transfer Station to Increase its garbage tonnage. If this project is allowed to move forward it will have a negative impact on the students at Mulready Elementary School and the residents of Hudson for decades to come. Please consider the health of our community!

Gratefully,
Katie Staines
68 Bennett St
Hudson MA

Katie Staines, LICSW
Clinical Social Worker
Mayo Family Pediatric Pain Rehabilitation Center
She/her

Boston Children's Hospital
2 Brookline Place, Brookline MA
781-216-1650

SUPPORT HEALTH EQUITY END RACISM

Boston Children's
Where the world comes for answers

Outlook

Dump expansion near Mulready Elementary

From K Peterson <kellipetes@gmail.com>
Date Fri 11/22/2024 7:58 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mister Moreno,

I am writing to express my concerns about BP's proposed expansion of the garbage dump near Joseph L. Mulready Elementary School in Hudson, Massachusetts. Locating a facility like this so close to a school raises serious questions about the health and safety of our children. Between this and the proposed bus storage behind the same elementary building, it is beginning to seem like our young children are simply not a priority to the town.

I urge you to take action against this proposed expansion and prioritize the health and safety of our children by exploring alternative sites away from residential and school zones.

Thank you for your attention to this critical issue.

Sincerely,

Kelli Peterson

Outlook

Transfer Station Concerns

From rachel bernier <rachelrbernier@gmail.com>
Date Fri 11/22/2024 5:39 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

My name is Rachel Attaway, and I am a parent of a kindergarten student at Mulready Elementary School. I am writing to express my concerns about the expansion of the BP Transfer station's tonnage.

My child attends Mulready and I am concerned of the excess traffic on the street before, during, and after school and the disruption it will cause my student. I am also worried about the excess smell that my child will be affronted by when they go out to play on the Playground. My son also plays deck hockey off cox street and the smell at his games was so bad my parents were commenting on it. I can't imagine how bad it would be if the amount of garbage increases. I can't even think about my son smelling and breathing that in at school every day.

There is no added benefit of the town to allow BP to take in extra garbage and will only cause more headaches and challenges for our wonderful community. I strongly urge that the town does not allow the transfer station to increase its garbage supply by 242.85% which is about 1700% percent of what the town uses.

Please do not allow the Transfer Station to Increase its garbage tonnage and to disrupt the students of Mulready Elementary.

Gratefully,
Rachel Attaway

Sent from my iPhone

View Comment

Comment Details

EEA #/MEPA ID
16586

Comments Submit Date
11-22-2024

Certificate Action Date
11-22-2024

Reviewer
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov

First Name
Michael

Last Name
Brophy

Phone
--

Email
m_brophy@verizon.et

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Address Line 2
--

State
MASSACHUSETTS

Zip Code
01749

Organization
Riverside Gun Club

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Comments reflect views of Riverside Gun Club - largest property abutter

Comments

Based upon our review of the FEIR, we offer the following comments:

Since the draft EIR the paved area of the project has significantly expanded resulting in negative environmental consequences. Regretfully we did not see the draft EIR prior to end of the comment period as a result our comments are new.

The increased impervious surface requires disturbing of virtually the entire property and eliminates virtually every tree on the property. Under the previous plan there was a forested buffer zone along the property line. The current plan calls for disturbing the entire area removing in excess of 100 mature mostly pine trees. These trees would otherwise provide screening of machine noises, smells, and a visual impact to our property.

We have additional thoughts and comments that we will reserve for the coming town approval process.

Attachments

Update Status

Status

Accepted

SUBMIT

Share Comment

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BACK TO SEARCH RESULTS

Outlook

Comments on Hudson Transfer Station Expansion Project

From Sarah Cahn <sacahn14@gmail.com>
Date Fri 11/22/2024 5:28 PM
To health@townofhudson.org <health@townofhudson.org>; Kate.Hogan@mahouse.gov <Kate.Hogan@mahouse.gov>; James Eldridge <james.eldridge@masenate.gov>; Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

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Hello,

I am a current Hudson MA resident.

I listened in on the town hall meeting this past Monday and would like to provide my input on the Hudson Transfer Station Expansion project.

I am not a proponent of having this project move forward for the following reasons :

1) There are so many large trucks that go in and out of the area, which contribute to a lot of noise in the surrounding area as well as significant traffic on Cox Street. My concern is that allowing B-P Trucking to expand on their property will only exacerbate the current situation, and it will not be appreciated by the locals and neighboring streets.

2) I live in a nearby street and very much appreciate having a low noise level at my house. Allowing B-P trucking to expand on their property will only increase the noise in the area for the surrounding neighborhoods.

Thank you for your time and consideration.

Kind Regards,

Sarah Wise

]

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Telephone: 617-626-7300
Facsimile: 617-727-0030

Maura Healey
Governor

Kim Driscoll
Lt. Governor

Rebecca Tepper
Secretary

Elizabeth Mahony
Commissioner

27 November 2024

Rebecca Tepper, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: Hudson Solid Waste Transfer Station & Recycling Factory, Hudson, MA, FEIR #16586

cc: Jo Ann Bodemer, Director of Energy Efficiency, Department of Energy Resources
Elizabeth Mahony, Commissioner, Department of Energy Resources

Dear Secretary Tepper:

We've reviewed the Final Environmental Impact Report (FEIR) for the proposed project. The project includes a 3,000 SF conditioned office space, adjoining a 53,000 SF unconditioned transfer station building. There will be 25 new parking spaces.

Executive Summary

The proposed buildings can readily achieve a high level of emissions mitigation with their commitments to efficient electrification of space and water heating and improved envelope, as described herein.

Executive Summary

Hudson is a Stretch Code town. Accordingly, code minimum is Massachusetts Stretch Energy Code (IECC 2021 with MA and Stretch Code Amendments). More information can be found here: Stretch Energy Code FAQ.

Key Commitments

The project is committing to the following key items:

- High performance building envelope for conditioned spaces.
- 100% electric heat pump space heating and cooling.
- Electric domestic hot water heating via air source heat pumps.
- Roofs will be constructed to be PV ready.
- Installed EV charging and readiness.

Recommendations

While the DOER continues to recommend that the project include the above-code GHG mitigation measure, of improved air infiltration limits (Option 8 of Section C406), provided there are no changes to the key commitments, the DOER has no further recommendations for this project.

Sincerely,
Massachusetts Department of Energy Resources

Becca Edson
Decarbonization Architect

Paul F. Ormond, P.E.
Energy Efficiency Engineer

EXHIBIT C

ODOR ANALYSIS REPORT

Hudson Solid Waste Transfer Station and Recycling Facility
Hudson, Massachusetts

Prepared for:

Sanborn Head & Associates, Inc.
6 Bedford Farms Drive
Bedford, NH 03110

Prepared by:

Epsilon Associates, Inc.
3 Mill & Main Place, Suite 250
Maynard, MA 01754

September 22, 2025

TABLE OF CONTENTS

LIST OF APPENDICES

1.0 EXECUTIVE SUMMARY

B-P Trucking, Inc. (B-P) is seeking to relocate the existing Hudson, MA Solid Waste Transfer Station operations further into the interior of the 72-acre town-owned property on which the facility is located. The property is located at 1 Municipal Drive, which is also referred to as 300 Cox Street with respect to the address of the existing transfer station. The existing facility handles municipal solid waste and construction and demolition debris and has a permitted capacity of 350 tons per day. B-P has proposed to construct the new transfer station (Project), with a proposed permitted capacity of 850 tons of solid waste per day.

Epsilon Associates Inc. (Epsilon) has been retained by Sanborn Head & Associates, Inc. to provide supporting documentation to the Hudson Board of Health (the "Board") in connection with the Request for Minor Modification to Site Assignment (the "Request") filed by B-P and the Hudson Department of Public Works (the "Proponents").

2.0 INTRODUCTION

The proposed transfer station will be located further into the approximately 72-acre parcel of Town-owned land on which the existing transfer station is located. In addition to the existing transfer station, the parcel is also the location of several other municipal facilities, including a fire department, combined police department and public works facility, and wastewater treatment facility. The existing transfer station has a dedicated access road, located at 300 Cox Street, whereas the remaining municipal operations are accessible via Municipal Drive, located approximately 300 feet north of the transfer station entrance.

The location of the proposed transfer station will place the building near the southeastern corner of the property, setting the operations more distant from Cox Street and the Town's other municipal facilities, as shown in Figure 2-1. For comparison, the existing transfer station building is located approximately 350 feet from Cox Street, whereas the proposed transfer station will be located approximately 1,800 feet from Cox Street. The Riverside Gun Club owns the property that abuts the site to the east and along a portion of the southern property line in the vicinity of the proposed building. Another abutting property to the south is the Joseph L. Mulready Elementary School, where the school building is located approximately 1,300 feet southwest of the proposed transfer station building. The land to the north and east is mostly undeveloped land and the land to the south and west is primarily residential. The nearest residential areas are approximately 2,000 feet south and northwest of the proposed building area along Wilkins Street (Route 62) and Elaine Circle, respectively.

During typical operations, municipal solid waste (MSW) and construction and demolition debris (C&D) will be deposited on the tipping floor inside the building. Two front-end loaders, one used for MSW handling and one for C&D, will be used to move the material and temporarily stockpile it at either end of the tipping floor (eastern end for MSW and western end for C&D). One excavator dedicated to MSW handling and one dedicated to C&D handling will operate on the tipping floor, each used to load their respective materials into the open top trailers located in the two trailer pits that are also located within the building. The main sources of odor include odorous or putrescible waste (such as food waste) and emissions from visiting vehicles and facility operating equipment (loaders and excavators). This report describes the steps that B-P Trucking will take to avoid and minimize offsite odors associated with the operation of the proposed facility.

G:\Projects2\MA\Hudson\25-0063\MXD\2-1_Site_Area_20250716.mxd

Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services

B-P Trucking Transfer Station and Recycling Facility Hudson, Massachusetts

Epsilon Associates Inc.

Figure 2-1
Site Area

3.0 BASIS FOR REVIEW

This analysis is prepared to support documentation of compliance with the relevant approval standards for odor associated with the Request for Minor Modification to Site Assignment (the "Request") by B-P Trucking, Inc. and Hudson Department of Public Works (the "Proponents") for the property located at 1 Municipal Drive (also referred to as 300 Cox Street), Hudson, Massachusetts (the "Property"). The Minor Modification to Site Assignment is required because the existing site assignment does not stipulate a capacity or total volume limit, and the Proponents intend to increase the permitted capacity to 850 tons of solid waste per day.

Pursuant to M.G.L. c. 111, § 150A, the Board should grant the minor modification to the site assignment unless the requested increase in daily tonnage would present a danger to public health, safety, or the environment. Consistent with 310 CMR 16.40(1)(c)(1), the Request should be evaluated with the presumption that the proposed facility will be designed and constructed to meet all relevant state and federal statutory, regulatory, and policy requirements.

While not directly applicable to the standard of review for the Request, the Commonwealth of Massachusetts and the Town of Hudson have the following regulations and guidelines related to odor (there are no applicable federal requirements for odor):

- The Massachusetts Department of Environmental Protection (MassDEP) regulates odor under its Air Pollution Control regulations. In these regulations, an "air contaminant" is defined to include odor, and a condition of "air pollution" includes the presence of an air contaminant in such concentration and duration as to "cause a nuisance" or "unreasonably interfere with the comfortable enjoyment of life and property." (310 CMR 7.00).

- The MassDEP air quality regulations state "No person having control of any dust or odor generating operations… shall permit emissions therefrom which cause or contribute to a condition of air pollution" (310 CMR 7.09(1)). Further, "No person shall cause, suffer, allow, or permit the handling, transportation, or storage of any material in a manner that results or may result in emissions therefrom which cause or contribute to a condition of air pollution" (310 CMR 7.09(4)).

- MassDEP separately states that motor vehicles registered in the Commonwealth shall comply with pertinent regulations of the Registry of Motor Vehicles relative to exhaust and sound emissions. (310 CMR 7.11).

- The Town of Hudson's Protective Zoning By-Law requires that applications describe "adequate… control of lighting, sound emissions and odor emanating from the site" (8.1.7.3(d)(5)) and have no odor requirements specific to industrial districts.

In practice, MassDEP directs complaints associated with odor issues from business operations to the local Board of Health[1].

[1] https://www.mass.gov/info-details/filing-environmental-complaints#-dust-or-odor-issues-

4.0 ODOR MITIGATION & REQUIREMENTS

4.1 Odor Definition

Different individuals experience odor differently. Experience of odor character, and whether the odor is considered objectionable, will vary from person to person. In Massachusetts, odor is regulated under 310 CMR 7.09 such that operations that emit odors shall not permit their emissions to "cause a condition of air pollution." Sources of odor from a solid waste transfer station include decomposition of odorous or putrescible waste (such as food waste) and emissions from fuel-burning vehicles and equipment. Odors from waste transfer stations are expected to vary based on the wastes received each day and the weather conditions, since warm or wet weather may increase odors.

4.2 Regulatory Guidance

The Air Pollution Control regulations in 310 CMR 7.00 do not contain specific requirements for odor prevention and mitigation and 310 CMR 19.200's minimum performance and design standards and operation and maintenance standards for solid waste handling facilities do not mention odor. Thus, Epsilon reviewed relevant industry guidance to generate the list of odor mitigation practices, included as Appendix A, which will be followed at the facility. These best management practices include the complaint hotline, misting and fogging systems, restriction of truck operations (idling, engine revving), indoor storage and operation, orienting doors away from prevailing winds, and increasing distance to possible receptors. Odorous wastes will be diverted or removed from the tipping floor as soon as possible, and all other wastes will typically be removed from the site within 24 hours, except for trailers filled towards the end of a Friday and requiring storage until the following Monday (weekend holdover). This quick turnover time will prevent waste from becoming odorous while onsite. Frequent odor inspections and monitoring of the complaint hotline will ensure best practices are employed appropriately to respond to current weather conditions and types of waste on-hand.

4.3 Industry Experience

Based on Epsilon's experience with similar solid waste transfer stations, it is not expected that the operations at the proposed facility will cause odor nuisance conditions at the nearby receptors, the nearest of which is the Riverside Gun Club over 400 feet to the southwest, so long as best management practices are upheld. It is expected that odors generated onsite will be minimal and will remain within the transfer station building, so as to not become a nuisance to neighbors. The majority of best practices listed in the attached BMP document are already practiced at the current B-P Trucking Hudson location, so operators already have relevant training and experience.

5.0 CONCLUSIONS

The proposed project has been developed to avoid causation of odor "nuisance" conditions. The facility is located sufficiently far from potential odor receptors and oriented so that prevailing winds will not transfer odors from the facility towards receptors. Further, operational best management practices listed in Appendix A will be employed to identify, prevent, and mitigate potential odor issues at the facility. The facility design and operational BMPs will address and mitigate potential odor at the proposed facility, ensuring that the operations will not constitute a danger to public health, safety, or the environment.

Appendix A

Odor and Noise Best Management Practices

ODOR AND NOISE BEST MANAGEMENT PRACTICES

Hudson Solid Waste Transfer Station and Recycling Facility
Hudson, Massachusetts

Prepared for:

Sanborn Head & Associates, Inc.
6 Bedford Farms Drive
Bedford, NH 03110

Prepared by:

Epsilon Associates, Inc.
3 Mill & Main Place, Suite 250
Maynard, MA 01754

September 22, 2025

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LIST OF ATTACHMENTS

1.0 INTRODUCTION

Epsilon has prepared this list of Best Management Practices which will be used to achieve compliance with the relevant approval standards for odor and noise associated with the Request for Minor Modification to Site Assignment (the "Request") by B-P Trucking, Inc. and Hudson Department of Public Works (the "Proponents") for the property located at 1 Municipal Drive (also referred to as 300 Cox Street), Hudson, Massachusetts (the "Property"). The Minor Modification to Site Assignment is required because the existing site assignment does not stipulate a capacity or total volume limit, and the Proponents intend to increase the permitted capacity to 850 tons of solid waste per day.

2.0 ODOR REDUCTION & MITIGATION BEST MANAGEMENT PRACTICES

2.1 Programming Elements

1. The design, location, and capacity of the planned permanent odor and dust control misting system. This BMP will be implemented with initial operation. Permanent misting systems will be located in the ceiling of the MSW tipping floor and trailer pit areas. Misting systems will be designed to be operational as necessary throughout the year.

    a. The proposed misting system will consist of three fog cannons that will provide odor and dust control coverage for the MSW and C&D tipping floor and trailer pit areas. Two fog cannons will be located above the overhead doors that provide access onto the tipping floor and a third will be installed in the northwest corner of the building to provide coverage of the tipping floor and the two trailer pits.

    b. The fog cannons, which can be operated in both stationary and oscillating mode, will be connected to a central pump/deodorizer/control station via high pressure hydraulic piping. The system will be installed with auto drain lines at the low point in the hydraulic feed lines. These will drain the pumps and feed lines to prevent freezing, allowing the system to operate throughout the year without requiring deactivation during the winter months.

2. When considering the flow of solid waste through the Station, the following BMPs will be implemented with initial operation based on their having been factored into the facility design:

    a. Evaluating the dimensions of the building(s) to ensure capacity to allow indoor handling of all waste;

    b. Evaluating the prevailing wind direction to determine building orientation and setback to adjacent properties. The tipping floor roll-up doors are oriented away from prevailing winds and to avoid creating a “wind tunnel” affect within the interior spaces. Prevailing winds are most frequently from the west, and tipping doors open to the southeast.

    c. Carefully orienting the building and its doorways with respect to odor-sensitive neighboring property and closing as many doors as practical during operating hours.

3. Designing floors for easy cleanup, including a concrete surface with a positive slope to collection systems. This BMP will be implemented with initial operation. Steps will be taken to eliminate crevices, corners, and flat surfaces, which are harder to keep clean and where waste residue can accumulate.

    a. Regular inspection and cleaning of tipping floor trench drains to remove odor-producing residues.

a. Paving of outdoor areas for ease of cleaning by street sweeper.

4. Exhaust ventilation. This BMP will be implemented with initial operation. The building's ventilation system will be designed to account for considerations such as odor and dust control, as well as management of emissions from mobile equipment operating on the tipping floor. Air filtration options and ventilation needs, including the location of ventilation components such as air intake louvers and exhaust fans, will be identified as part of the mechanical system design for the building.

5. No open outdoor storage. This BMP will be implemented with initial operation. The outdoor residential drop-off compactors will be closed systems, and any temporary outdoor trailer storage/staging will be in tarped trailers.

    a. As part of normal facility operations, storage of material within the building will occur overnight and material stored overnight will be loaded into trailers the following operating day. Other overnight storage would occur when needed for holding full trailers before transporting them off-site. Under normal operations, this temporary full vehicle layover would typically not exceed 24 hours, except for trailers filled towards the end of a Friday and requiring storage until the following Monday (weekend holdover).

2.2 Operating Practices

1. Exhaust ventilation maintenance. This BMP will be implemented with initial operation. Ventilation systems, including fans, will be operated and maintained according to manufacturer's specifications. Any filters will be replaced at frequencies recommended by manufacturers.

2. Indoor waste handling. This BMP will be implemented with initial operation. To minimize odor generation from the operation, all processing, tipping, sorting, storage, and loadout will occur within the enclosed building. Transfer trailers will be tarped prior to exiting the trailer pits. Then trailers will weigh and exit the site.

    a. Residential MSW drop-off will be performed in the residential drop-off area at the stationary compactors, which themselves will provide odor control through the fully enclosed containment of the residential MSW waste stream.

    b. The quantity of material in the building is not expected to exceed one day's worth of permitted capacity.

3. Operator procedures to inspect the Station, identify needed cleanups and maintenance, and promptly implement needed cleanups and maintenance. This BMP will be implemented with initial operation. Inspection rounds (Attachment 1) will be scheduled so that operators may identify conditions which may cause an odor throughout the day. Potentially odorous conditions may include waste which has been onsite for longer than planned or liquid that has dripped onto floors. Conditions requiring maintenance include any issues with doors, ventilation, or misting systems.

4. Use of the street sweeper. This BMP will be implemented with initial operation. Any material tracked out of the building will be swept up promptly. B-P will dispatch a heavy-duty nylon bristle street sweeper for the regular dry cleaning of paved travel ways as needed.

    a. Hoses located near the tipping floor doors will be used to wet the tipping floor to conduct a wet sweep as needed.

    b. The heavy-duty rubber edge of the loader bucket also cleans the floor by pushing materials and residues like a squeegee.

5. First-in, first-out processing. This BMP will be implemented with initial operation. All waste will be removed from the facility within 24-72 hours of arrival, accounting for weekend holdover.

    a. As an exception to the "first-in, first-out" waste transfer policy, odorous waste loads, such as food waste, will take priority when loading trailers for off-site material disposal. B-P and third-party drivers are encouraged to provide advanced notice of incoming odorous loads so that any such loads can be immediately transferred into an awaiting trailer.

6. Instructions to Proponent and third-party haulers outlining queuing best practices and truck cleaning requirements to avoid liquid dripping outside of the building. See Attachment 3. This BMP will be implemented with initial operation.

7. Handling of liquids. This BMP will be implemented with initial operation. All unloading and handling of waste will be performed within the building, which will prevent the creation of potentially odiferous liquids because precipitation will not come in contact with materials in the building. Floor drains located within the building will discharge to an oil/water separator prior to conveyance to Hudson's wastewater treatment plant. The trench drains will be installed with in-line trash buckets designed to collect debris washed from the trench channels.

    a. Keeping building floor drains clean so odor-causing residues do not build up. This BMP will be implemented with initial operation. Floor trench drains and their trash buckets will be inspected daily and hoses will be used to flush out the drains when needed. Floor drains will discharge to the building's sanitary sewer system, which will convey floor drain flow to the nearby wastewater treatment plant.

8. Cleaning of the tipping floor. This BMP will be implemented with initial operation. The tipping floor will be cleared of solid waste for occasional floor washdown as needed. The optimum cleaning time would likely be later in the day when incoming truck counts are low.

9. Maintaining a clear distance from the tipping floor roll-up doors inward which is clear and free of waste. This BMP will be implemented with initial operation. Establishing a clear space will avoid situations where the loader needs to exit the building for clean-up. The tipping floor area has been sized to provide a sufficient vehicle access corridor within the building to accommodate a solid waste collection vehicle fully within the building while storing a peak day's capacity.

2.3 Plans to Identify and Respond to Odor Problems

1. Evaluating and addressing odor complaints received via a hotline telephone number which will connect to the operators on shift. This BMP will be implemented with initial operation. By gathering as much information as possible about the conditions that created the odor problem as soon as possible, B-P can take focused action to eliminate recurrence.

    a. The hotline call intake sheet, Attachment 2, includes fields for asking callers to describe the odor and its intensity and persistence. The sheet also has space for documenting complaint location, time of complaint, and weather conditions.

    b. Odor inspection process in response to any complaints from the general public should include identification of wind direction and other weather conditions, identification of odorous loads, and investigation of odor at the property line in the direction of the complaint and at the location of the complaint.

    c. Maintain an odor complaint log recording all information collected during intake process, which can be compared to operational logs to find potential causes of reported odors.

2. Maintaining an onsite weather station. This BMP will be implemented with initial operation. Collecting real-time weather data, such as wind speed and direction, will allow for quick determinations of whether an odor experienced at a residence could be resulting from the transfer station or from another source, such as the nearby wastewater treatment facility, to improve response actions.

3. Recordkeeping of operating data which may help to indicate the cause of an odor condition, such as security video footage and truck and trailer scale records. This BMP will be implemented with initial operation.

4. Systems to implement responses to complaints. This BMP will be implemented with initial operation. Possible action to address reported odors could include instructing customers not to send certain waste or increasing floor cleaning frequency.

5. Operator procedures to identify odiferous loads and expedite processing or divert the loads. This BMP will be implemented with initial operation. Odiferous or putrescible loads will be identified by operators, if not identified in advance by drivers, and removed from the station in no more than 24 hours.

6. B-P will add an odor mitigation portion to the existing monthly safety meetings. Meetings will emphasize the need to avoid odors and encourage feedback regarding specific activities or events that could produce odor. Employees will be asked to think about potential odor issues and solutions and given a communication pathway to provide those thoughts to management. Subsequent meetings will follow-up on feedback received and ask for any additional thoughts.

7. B-P will develop an odor mitigation training module and train all new employees on the odor mitigation module once it is developed. Training will include protocols for recordkeeping, odor identification, and odor response.

2.4 Retrofit Options

1. Use of portable foggers/misting systems in addition to the permanent systems. This BMP will be implemented as appropriate should an odor issue arise. Options include:

    a. Local fogging systems

    b. Building-wide fogging systems

    c. Odor control additives [Fogco or equivalent; B-P will evaluate the effectiveness of different vendor's options in treating the specific odor issue]

2. Upgrade of sweeper. This BMP will be implemented as appropriate should an odor issue arise. Replacing the current nylon brush street sweeper with one that has a water holding tank may allow for easier wet cleaning of the tipping floor if hoses are found to be insufficient.

3. Exhaust ventilation for dispersion. This BMP will be implemented as appropriate should an odor issue arise. Improving ventilation would be helpful if there is an odor issue close to the facility. In that case, enhanced capture could be achieved by replacing the fans, and enhanced dispersion could be achieved by increasing exhaust height. The larger fans would be designed to maintain a face velocity of 100 feet per minute at open doors to help ensure that odors are captured by the building ventilation system. The exhaust point(s) would be designed to improve dispersion and avoid the potential for downwash.

4. Door dimensions and opening and closing cycle times; some doors may be closed during periods of low vehicle visits to the facility and as appropriate to direct vehicles to portions of the tipping floor where drop-off activities may be preferred as part of the overall management of materials delivered to the building. This BMP will be implemented as-needed. Utilize high-speed roll-up doors for incoming trucks when justified based on traffic activity/utilization (doors that can remain closed for the majority of time but not all the time).

    a. There are six roll-up doors which will allow access to the MSW and C&D tipping floor area and two roll-up doors which allow access to the recyclables processing portion of the building. All doors are on the southern wall of the building. The C&D and MSW tipping floor doors are expected to be open for use frequently. The recycling doors may be better candidates for replacement with high-speed roll-up doors.

5. Treating floor drainage systems periodically with odor-neutralizing and bacteria-inhibiting solutions. This BMP will be implemented as appropriate should an odor issue arise.

6. Requesting that customers not deliver certain highly odorous wastes, for example, food waste that has been allowed to putrefy. This BMP will be implemented as appropriate should an odor issue arise, particularly if one customer is found to be a recurring problem

3.0 NOISE REDUCTION & MITIGATION BEST MANAGEMENT PRACTICES

3.1 Options to Reduce Sound Levels

1. The building has been sized to ensure capacity to allow indoor handling of all waste. Accordingly, this BMP will be implemented with initial operation. To minimize noise outside of the building, all tipping, sorting, storage, and loadout will occur within the enclosed building.

2. Arranging the facility layout to eliminate steep uphill grades for waste-hauling trucks, as driving uphill can significantly increase noise levels. This BMP will be implemented with initial operation. The site has been designed so that visiting trucks do not need to drive on steep grades.

3. All collection vehicles owned by B-P, as well as those used in the operation of the facility, shall have "white noise" back-up alarms rather than traditional beepers. This BMP will be implemented with initial operation. B-P may also consider using beeper alternatives such as strobe lights and proximity detectors.

    a. Any traditional back-up alarms which must be used will be set at the lowest levels allowed by OSHA and local regulations.

    b. Note that backup beepers are expected to be the only possible source of a pure tone onsite. No other aspects of operation or traffic will generate a pure tone.

4. Conducting activities that generate the loudest noise during selected hours, such as the morning or afternoon commute hours, when adjoining properties are unoccupied, or when offsite background noise is at its highest. This BMP will be implemented with initial operation.

    a. Under normal conditions, outdoor operations, will be limited to daytime hours, 7 am to 5 pm, when the facility is open to the public.

    b. Evening activity (5 pm to 6 pm) will be limited as much as possible and focused on end-of-day shutdown activities, including some material handling within the building and cleaning practices associated with routine housekeeping activities.

    c. The only regular nighttime noise sources are expected to be the building's exhaust fans, which may operate continuously. If odorous loads are delivered at the end of a day or approaching a weekend holdover, evening activity may include loading odorous waste into a trailer, and nighttime activity may include cleaning activities.

5. Truck standards communicated to third parties. This BMP will be implemented with initial operation. B-P will generate and supply training handouts (Attachment 3) for third-party truck drivers with steps that they should be taking in order to reduce and mitigate noise to the greatest extent possible. Noise restrictions will include:

a. Avoid traffic flows adjacent to noise-sensitive property.

b. Obey speed limits

c. Drop loads slowly

d. No idling more than 5 minutes

e. Do not slam doors or gates

f. No use of jake brakes

g. No revving the engine

h. Limit horn use to emergencies

i. Back-up only when needed

6. Facility-wide, B-P will ensure equipment is not idling when not actively being used. This BMP will be implemented with initial operation. B-P will ensure that diesel or gasoline powered equipment will not be allowed to idle when not actively being used. Training material will include instructions to avoid idling when not active.

7. B-P will ensure that all vehicles and equipment are operated and maintained per the manufacturer's specifications. This BMP will be implemented with initial operation. Properly maintaining mufflers and engine enclosures on mobile equipment operating within the transfer station. B-P will insist that operators of commercial hauling vehicles keep their equipment, including the muffler systems, in good repair.

3.2 Plans to Identify and Respond to Noise Problems

1. Identification of all noise-generating activities. This BMP will be implemented with initial operation. Expected noise-generating equipment on site is as follows:

    a. Tipping of waste onto the tipping floor and loading material into trailers

    b. Loaders

    c. Excavators

    d. Handling and baling of recyclables in the building

    e. Residential compactors

f. Beyond these specific sources, there are other noise-generating sources typical to an industrial material handling operation. These include delivery trucks, yard maintenance vehicles, employee vehicles, etc.

2. B-P will implement video monitoring of operations. This BMP will be implemented as appropriate should a noise issue arise. B-P will place security-style cameras with several days of recording capacity providing an overall view of the facility. B-P will review periods of footage that align with specific noise complaints and interview staff, if appropriate, to attempt to identify what activity caused an elevated noise level. If this review identifies an onsite B-P activity that could be causing elevated offsite noise, B-P will review options to avoid, minimize, or mitigate the noise-generating activity.

3. Evaluating and addressing noise complaints received via a hotline telephone number which will connect to the operators on shift. This BMP will be implemented with initial operation. By gathering as much information as possible about the conditions that created the noise problem as soon as possible, B-P can take focused action to eliminate recurrence.

    a. Complaint Intake Process: asking hotline callers to describe the sound and its intensity and persistence. Documenting complaint location, time of complaint, and weather conditions

    b. Maintain a complaint log recording all information collected during intake process, using the sheet included as Attachment 2, which can be compared to operational logs to find potential causes of reported noise conditions

4. B-P will add a sound mitigation portion to the existing monthly safety meetings. Meetings will emphasize the need to avoid potentially objectionable noise, and to encourage feedback regarding specific activities or events that could produce excessive noise. Employees will be asked to think about potential noise issues and solutions and given a communication pathway to provide those thoughts to management. Subsequent meetings will follow up on feedback received and ask for any additional thoughts.

5. B-P will develop a noise mitigation training module that discusses operational noise. B-P will train all new employees on the noise mitigation module once it is developed. Training will include protocols for recordkeeping, noise identification, and noise response.

3.3 Retrofit Options

1. Door dimensions and opening and closing cycle times; some doors may be closed during periods of low vehicle visits to the facility and as appropriate to direct vehicles to portions of the tipping floor where drop-off activities may be preferred as part of the overall management of materials delivered to the building. This BMP will be implemented as-needed should a noise issue arise from within the transfer station building that is detected offsite. Increased door closure may be

accomplished by revising operating practices or by installing high-speed roll-up doors, if necessary.

a. High-speed roll-up doors are only recommended when truck traffic dictates that doors can remain closed for the majority of time but not all the time. There are six roll-up doors which will allow access to the MSW and C&D tipping floor area and two roll-up doors which allow access to the recyclables processing portion of the building. All doors are on the southern wall of the building. The six tipping floor doors are expected to be open for use frequently. The recycling doors may be better candidates for replacement with high-speed roll-up doors, as needed if noise issues arise from within the transfer station building.

Attachment 1

Odor & Noise Inspection Checklist

Odor & Noise Inspection Checklist

Name: Date:

Time:

Conduct facility walk-through to determine whether corrective action is necessary to maintain the conditions listed below. Complete corrective actions as soon as possible.

Condition	Corrective action needed? Y/N
All roll-up doors are in good repair and are able to open and close to accommodate trucks	
Building ventilation is in good repair and active during operational hours	
Misting system is in good repair and active during operational hours	
All fog cannons are in good repair and active during operational hours	
No trash is found outside of the building	
Waste deposited on the tipping floor is kept clear from the path of entering vehicles so that a sufficient access corridor is maintained that allows, at minimum, the full length of the vehicle to enter the building	
Outdoor compactors and compaction containers are properly coupled to prevent leaking or dripping	
Building floor drains are not blocked	
No liquid is dripping from waste or trucks onto floors inside the station	
No waste has been onsite for more than 24 hours, unless for weekend holdover (72 hours maximum)	
No odor is detectable at the station perimeter	
All equipment (compactors, vehicles, loaders, excavators) is in good repair and not making any unexpected noises	

List any corrective actions taken during inspection walk-through:

List any corrective actions submitted as maintenance request to be completed:

Attachment 2

Hotline Call Intake Form

Hotline Call Intake Form

When a phone call is received, politely ask callers for the information in **bold** and write their responses. Please fill in the remaining information right after the call is complete.

Operator name:		**Caller name:**	
Date:		Call time:	
Address of complaint:			
If caller would like to be contacted for follow-up, contact info:			
Wind Direction:	Wind Speed:	Temp:	Precipitation:
If an ODOR complaint, what does it smell like (sewage, solvents, rotten food)?		**If a NOISE complaint, what does it sound like (engines, shattered glass, beeping)?**	
Is it very strong/loud? Where does it seem to be coming from?			
How long has the odor/noise been happening today? Is it constant? Has it ever been noticed before?			
If a BP employee goes to investigate the complaint location, property line, possible sources of the problem, or any other areas, please complete the fields below:			
Locations checked:	*Time:*	*Describe odor/noise, if any:*	

Attachment 3

Third-Party Driver Handout

Third Party Driver Handout

Please follow the guidelines below while onsite at BP Hudson and while driving to & from the facility:

- If you know you are carrying an odorous load (ex: old food waste), please call **(508) 231-1000 x1136** or **(978) 567-9694** so that operators at the facility can prepare for efficient handling and disposition of the material
- Queue only in the designated area, along the facility's access road
- Avoid traffic flows adjacent to noise-sensitive property
- Obey speed limits
- Drop loads slowly
- No idling in excess of 5 minutes
- Do not slam doors or gates
- No use of jake brakes
- No revving the engine
- Limit horn use to emergencies
- Back-up only when needed
- After dropping off waste, if needed rinse trucks inside the building to remove any liquid that may drip when departing the building
- Vehicles must be maintained in good repair, including muffler systems

EXHIBIT D

SOUND LEVEL STUDY

Hudson Solid Waste Transfer Station and Recycling Facility
Hudson, Massachusetts

Prepared for:

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Prepared by:

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September 22, 2025

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1.0 EXECUTIVE SUMMARY

B-P Trucking, Inc. (B-P) is seeking to relocate the existing Hudson, MA Solid Waste Transfer Station operations further into the interior of the 72-acre town-owned property on which the facility is located. The property is located at 1 Municipal Drive, which is also referred to as 300 Cox Street with respect to the address of the existing transfer station. The existing facility handles municipal solid waste and construction and demolition debris and has a permitted capacity of 350 tons per day. B-P has proposed to construct the new transfer station (Project), with a proposed permitted capacity of 850 tons of solid waste per day.

Epsilon Associates Inc. (Epsilon) has been retained by Sanborn Head & Associates, Inc. to conduct an existing ambient sound level monitoring program and a future conditions sound level analysis to provide supporting documentation to the Hudson Board of Health (the "Board") in connection with the Request for Minor Modification to Site Assignment (the "Request") filed by B-P and the Hudson Department of Public Works (the "Proponents").

Epsilon performed specific analyses to support the Board's review of the Request. Pursuant to M.G.L. c. 111, § 150A, the Board should grant the minor modification to the existing site assignment unless the requested increase in daily tonnage would present a danger to public health, safety, or the environment.

Sound level measurements were conducted to characterize the existing sound levels near the existing site and in the vicinity of the proposed relocated facility. Computer sound modeling was used to predict operational sound levels from the proposed facility.

The highest predicted Project-only L_{eq} sound level at a residence is 47 dBA. That is consistent with sound levels at a small-town residential area, and does not present a danger to public health, safety, or the environment.

Separately, Epsilon has prepared a list of Best Management Practices, provided in Appendix A, which will be used to achieve compliance with the relevant approval standards for noise. That list describes programming elements and operational practices to minimize noise, plans to identify and respond to noise problems, and options that will be available to retrofit the facility to address noise issues that may arise.

2.0 INTRODUCTION

The proposed transfer will be located further into the approximately 72-acre parcel of Town-owned land on which the existing transfer station is located. In addition to the existing transfer station, the parcel is also the location of several other municipal facilities, including a fire department, combined police department and public works facility, and wastewater treatment facility. The existing transfer station has a dedicated access road, located at 300 Cox Street, whereas the remaining municipal operations are accessible via Municipal Drive, located approximately 300 feet north of the transfer station entrance.

The location of the proposed transfer station will place the building near the southeastern corner of the property, setting the operations more distant from Cox Street and the Town's other municipal facilities. For comparison, the existing transfer station building is located approximately 350 feet from Cox Street, whereas the proposed transfer station will be located approximately 1,800 feet from Cox Street. The Riverside Gun Club owns the property that abuts the site to the east and along a portion of the southern property line in the vicinity of the proposed building. Another abutting property to the south is the Joseph L. Mulready Elementary School, where the school building is located approximately 1,200 feet southwest of the proposed transfer station building. The land to the north and east is mostly undeveloped land and the land to the south and west is primarily residential. The nearest residential areas are approximately 1,600 feet south and northwest of the proposed building area, along Wilkins Street (Route 62) and Elaine Circle, respectively.

During typical operations, municipal solid waste (MSW) and construction and demolition debris (C&D) will be deposited on the tipping floor inside the building. Two front-end loaders, one used for MSW handling and one for C&D, will be used to move the material and temporarily stockpile it at either end of the tipping floor (eastern end for MSW and western end for C&D). One excavator dedicated to MSW handling and one dedicated to C&D handling will operate on the tipping floor, each used to load their respective materials into the open top trailers located in the two trailer pits that are also located within the building. The main sources of sound are engine noise from trucks delivering waste to the facility and the machinery moving the waste inside the building.

This report presents the findings of an ambient sound level monitoring program and computer modeling to predict future sound levels of the operational Project. The Project components were modeled in CadnaA using sound data collected by Epsilon at the existing Hudson transfer station.

3.0 SOUND TERMINOLOGY

There are several ways in which sound levels are measured and quantified. All of them use the logarithmic decibel (dB) scale. The following information defines the sound level terminology used in this analysis.

The decibel scale is logarithmic to accommodate the wide range of sound intensities found in the environment. A property of the decibel scale is that the sound pressure levels of two or more separate sounds are not directly additive. For example, if a sound of 50 dB is added to another sound of 50 dB, the total is only a 3-decibel increase (53 dB), which is equal to doubling in sound energy, but not equal to a doubling in decibel quantity (100 dB). Thus, every 3-dB change in sound level represents a doubling or halving of sound energy. The human ear does not perceive changes in the sound pressure level as equal changes in loudness. Scientific research demonstrates that the following general relationships hold between sound level and human perception for two sound levels with the same or very similar frequency characteristics[1]:

- 3 dBA increase or decrease results in a change in sound that is just perceptible to the average person,
- 5 dBA increase or decrease is described as a clearly noticeable change in sound level, and
- 10 dBA increase or decrease is described as twice or half as loud.

Another mathematical property of decibels is that if one source of sound is at least 10 dB louder than another source, then the total sound level is simply the sound level of the higher-level source. For example, a sound source at 60 dB plus another sound source at 47 dB is equal to 60 dB.

A sound level meter (SLM) that is used to measure sound is a standardized instrument.[2] It contains "weighting networks" (e.g., A-, C-, Z-weightings) to adjust the frequency response of the instrument. Frequencies, reported in Hertz (Hz), are detailed characterizations of sounds, often addressed in musical terms as "pitch" or "tone". The most commonly used weighting network is the A-weighting because it most closely approximates how the human ear responds to sound at various frequencies. The A-weighting network is the accepted scale used for community sound level measurements; therefore, sounds are frequently reported as detected with a sound level meter using this weighting. A-weighted sound levels emphasize middle frequency sounds (i.e., middle pitched – around 1,000 Hz), and de-emphasize low and high frequency sounds. These sound levels are reported in decibels designated as "dBA". The C-weighting network has a nearly flat response for frequencies between 63 Hz and 4,000 Hz and is noted as dBC. Z-weighted sound levels are measured sound levels without any weighting curve and are otherwise referred

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1 Bies, David, and Colin Hansen. 2009. *Engineering Noise Control: Theory and Practice*, 4th Edition. New York: Taylor and Francis.

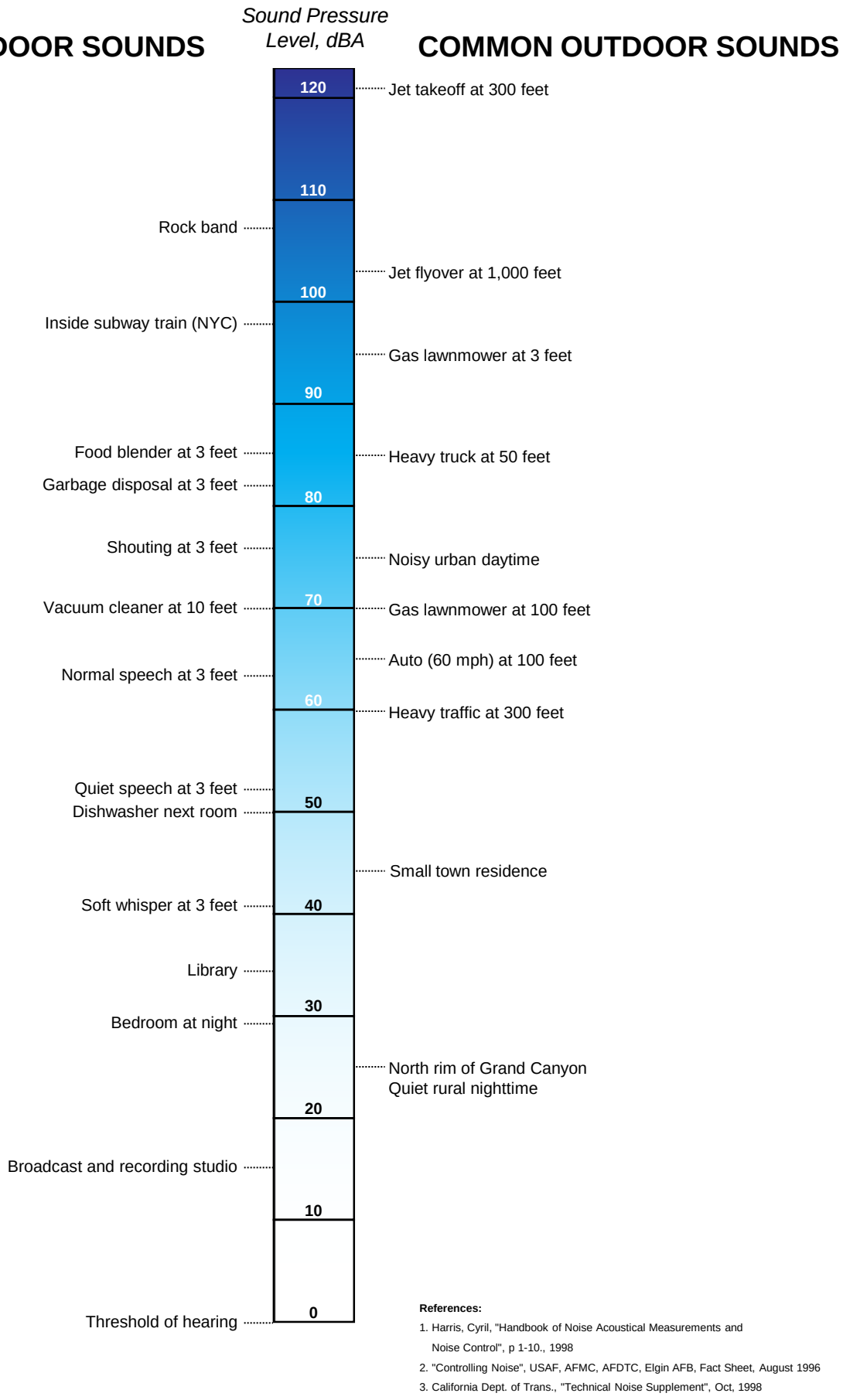
2 *American National Standard Specification for Sound Level Meters,* ANSI S1.4-2014 (R2019), published by the Standards Secretariat of the Acoustical Society of America, Melville, NY.

to as “unweighted”. Sound pressure levels for some common indoor and outdoor environments are shown in Figure 3-1.

Because the sounds in our environment vary with time they cannot simply be described with a single number. Two methods are used for describing variable sounds. These are exceedance levels and the equivalent level, both of which are derived from some number of moment-to-moment A-weighted sound level measurements. Exceedance levels are values from the cumulative amplitude distribution of all the sound levels observed during a measurement period. Exceedance levels are designated L_n, where n can have a value between 0 and 100 in terms of percentage. Several sound level metrics that are reported in community sound monitoring are described below.

- L_{90} is the sound level exceeded 90 percent of the time during the measurement period. The L_{90} is close to the lowest sound level observed. It is essentially the same as the residual sound level, which is the sound level observed when there are no obvious nearby intermittent sound sources. The L_{90} level is used to establish the “ambient” or “background” sound.

- L_{eq}, the equivalent level, is the level of a hypothetical steady sound that would have the same energy (*i.e.,* the same time-averaged mean square sound pressure) as the actual fluctuating sound observed. The equivalent level is designated L_{eq} and is typically A-weighted. The equivalent level represents the time average of the fluctuating sound pressure, but because sound is represented on a logarithmic scale and the averaging is done with linear mean square sound pressure values, the L_{eq} is mostly determined by loud sounds if there are fluctuating sound levels.



References:

1. Harris, Cyril, "Handbook of Noise Acoustical Measurements and Noise Control", p 1-10., 1998
2. "Controlling Noise", USAF, AFMC, AFDTC, Elgin AFB, Fact Sheet, August 1996
3. California Dept. of Trans., "Technical Noise Supplement", Oct, 1998

Figure 3-1

Common Indoor and Outdoor Sound Levels

4.0 BASIS FOR REVIEW

This analysis is prepared to support documentation of compliance with the relevant approval standards for noise associated with the Request for Minor Modification to Site Assignment (the "Request") by B-P Trucking, Inc. and Hudson Department of Public Works (the "Proponents") for the property located at 1 Municipal Drive (also referred to as 300 Cox Street), Hudson, Massachusetts (the "Property"). The Minor Modification to Site Assignment is required because the existing site assignment does not stipulate a capacity or total volume limit, and the Proponents intend to increase the permitted capacity to 850 tons of solid waste per day. The Board requested a noise study to support review of the Request.

Pursuant to pursuant to M.G.L. c. 111, § 150A, the Board should grant the minor modification to the site assignment unless the requested increase in daily tonnage would present a danger to public health, safety, or the environment. Consistent with 310 CMR 16.40(1)(c)(1), the Request should be evaluated with the presumption that the proposed facility will be designed and constructed to meet all relevant state and federal statutory, regulatory, and policy requirements.

While not directly applicable to the standard of review for the Request, the Commonwealth of Massachusetts and the Town of Hudson have the following regulations and guidelines related to noise (there are no applicable federal requirements):

- The Massachusetts Department of Environmental Protection (MassDEP) regulates noise under its Air Pollution Control regulations. In these regulations, an "air contaminant" is defined to include sound, and a condition of "air pollution" includes the presence of an air contaminant in such concentration and duration as to "cause a nuisance" or "unreasonably interfere with the comfortable enjoyment of life and property." (310 CMR 7.00).

- The MassDEP air quality regulations state that industrial and commercial sources of sound must prevent "unnecessary emissions from said source of sound that may cause noise." (310 CMR 7.10).

- Specific to the regulation in 310 CMR 7.10, MassDEP Division of Air Quality Control ("DAQC") Policy Statement 90-001 (February 1, 1990) (the "MassDEP Noise Policy") interprets a violation of this noise regulation to have occurred if the source causes either an increase in the broadband sound pressure level of more than 10 dBA above the ambient, or a "pure tone" condition. "Ambient" is defined as the background A-weighted sound level that is exceeded 90 percent of the time, measured during equipment operating hours (L_{90}). A "pure tone" condition occurs when any octave band sound pressure level exceeds both adjacent octave band sound pressure levels by 3 dB or more.
- MassDEP separately states that motor vehicles registered in the Commonwealth shall comply with pertinent regulations of the Registry of Motor Vehicles relative to exhaust and sound emissions. (310 CMR 7.11).

- The Town of Hudson General Bylaw Section 33 prohibits "loud, objectionable or unreasonable noise" between 11PM and 7AM, and states the Police Chief may designate quiet zones upon request of persons who are ill or near buildings where services are being conducted.

- The Town of Hudson General Bylaw Section 34 prohibits the use of engine brakes ("jake brake") except in emergencies.

In practice MassDEP directs complaints associated with noise disturbances from business operations to the local Board of Health[3].

[3] https://www.mass.gov/info-details/filing-environmental-complaints#-noise-disturbances-

5.0 OPERATIONAL SOUND LEVEL MEASUREMENTS

5.1 Existing Facility Sound Source Measurements

Sound level measurements were taken at the existing transfer station to quantify the typical sound sources associated with operations. The data were used to construct and calibrate a computer sound model of the existing facility and build a predictive sound model of the proposed future facility.

The existing transfer station is open to the public during the following hours:

- Monday through Friday: 7:00 am to 5:00 pm
- Saturday: 7:00 am to 2:00 pm
- Sunday: Closed

During the weekdays there may be some limited operations between the hours of 5:00 pm and 6:00 pm as part of the daily facility shutdown. During this time, the facility is not open to the public, but there may be some equipment operations occurring on the tipping floor. The proposed facility will have the same operating hours.

Sound level data were collected at the transfer station during typical weekday operations over a period of approximately two and half hours. Sound levels were monitored continuously using a tripod-mounted sound level meter at a location approximately 100 feet from the open waste handling building doors. A second sound level meter was used to take shorter duration measurements at locations near the facility perimeter.

5.2 Measurement Methodology

The sound level meters were mounted on tripods with the microphones placed at a height of approximately 1.5 meters (5 feet) above the ground. The onsite meter collected continuous sound level data from 10:27 am to 12:53 pm on Thursday, April 10, 2025. Observations of onsite activity were noted by a field technician during the measurements.

5.3 Measurement Equipment

Larson Davis (LD) 831A sound level meters, equipped with LD PRM831 preamplifiers and PCB 377C20 half-inch microphones were used to collect sound pressure level data at the measurement locations. Both meters were equipped with manufacturer-provided wind screens to reduce wind-induced noise.

All sound instrumentation meets the "Type 1 – Precision" requirements set forth in ANSI S1.4 for acoustical measuring devices. The measurement equipment was field calibrated before and after the measurements with a Norsonic model Nor1251 acoustical calibrator which meets the standards of IEC 942 Class 1L and ANSI S1.40. Statistical descriptors (e.g., L_{eq}, L_{90}, etc.) and third octave band data were collected for each measurement period.

5.4 Onsite Sound Levels

During the measurement period, the 1-second L_{eq} sound levels measured onsite opposite the waste handling building doors ranged from 54 dBA to 89 dBA L_{eq}. The 15-minute residual L_{90} sound levels at this location ranged from 55 to 67 dBA. Sound levels measured near the facility perimeter ranged from 48 to 70 dBA. These data were used to calibrate a sound model of existing facility operations. The sources from the calibrated model were then used to construct a model of the proposed facility as discussed in the next section.

6.0 MODELED SOUND LEVELS

6.1 Sound Sources

Sound data for potential noise-generating equipment was collected at the existing transfer station on April 10, 2025. Sources of sound from the Project are generally intermittent so levels tend to fluctuate throughout the day. To be conservative, all sources have been modeled as operating continuously and simultaneously, though in practice this will be a rare occurrence.

The noise generating activity due to front-end loader and excavator activity will take place inside the waste handling building and will emanate from the open roll-up doors. The sound power levels shown in Table 6-1 were taken from a calibrated model of the existing facility using the onsite sound pressure level measurement taken by Epsilon.

Table 6-1 Modeled Sound Sources

Sound Source	Location	Sound Power Level, dBA
Tipping Floor Roll-up Door Openings[1]	South facade of the proposed building	102
Trucks[2]	Outside of the tipping floor roll-up doors	70

Notes:

1. Based on interior building levels measured at the existing facility and model calibration. Sound power shown is per roll-up door (total of two doors at the existing facility).
2. Derived from onsite measurement taken by Epsilon. Sound power shown is per square meter to allow scaling based on the future facility size.

6.2 Modeling Methodology

The sound levels associated with the Project were predicted using the CadnaA sound level calculation software developed by DataKustik GmbH. This software uses the ISO 9613-2 international standard for sound propagation.[4] The software accounts for topography, ground attenuation, multiple building reflections (if applicable), drop-off with distance, and atmospheric absorption. The CadnaA software allows for octave band calculation of sound from multiple sources as well as computation of diffraction.

Inputs and significant parameters employed in the model are described below.

- *Project Layout:* The analysis is for the layout plan provided as Figure 1-4 of the October 15, 2024 Final Environmental Impact Report. The proposed Project layout is shown in Figure 6-1.

[4] *Acoustics – Attenuation of sound during propagation outdoors – Part 2: Engineering method for the prediction of sound pressure levels outdoors,* International Standard ISO 9613-2:2024 (International Organization for Standardization, Geneva, Switzerland, 2024).

- *Modeling Locations:* Epsilon selected modeling evaluation points at key locations as shown in Figure 6-2. All locations were modeled as discrete points at a height of 1.5 meters above ground level which is the approximate ear height of a typical standing adult.

- *Terrain Elevation:* Elevation contours for the modeling domain were imported into CadnaA to account for terrain shielding where appropriate. The terrain height contour elevations for the modeling domain outside of the Project property line were generated from elevation information derived from the National Elevation Dataset (NED) developed by the U.S. Geological Survey. The proposed grading within the Project property line were taken from the proposed conditions site plan provided as Figure 8-5 of the April 1, 2024 Draft Environmental Impact Report.

- *Source Sound Levels:* Sound power levels used in the modeling are described in Section 6-1.

- *Ground Attenuation:* Consistent with the ISO 9613-2 standard, the model allows inputs between 0 (hard ground) and 1 (porous ground). Spectral ground absorption was calculated using a G-factor of 0.5 for the entire modeling domain. An absorption of 0.5 corresponds to "mixed ground" consisting of both hard and porous ground cover and does not account for any vegetation.

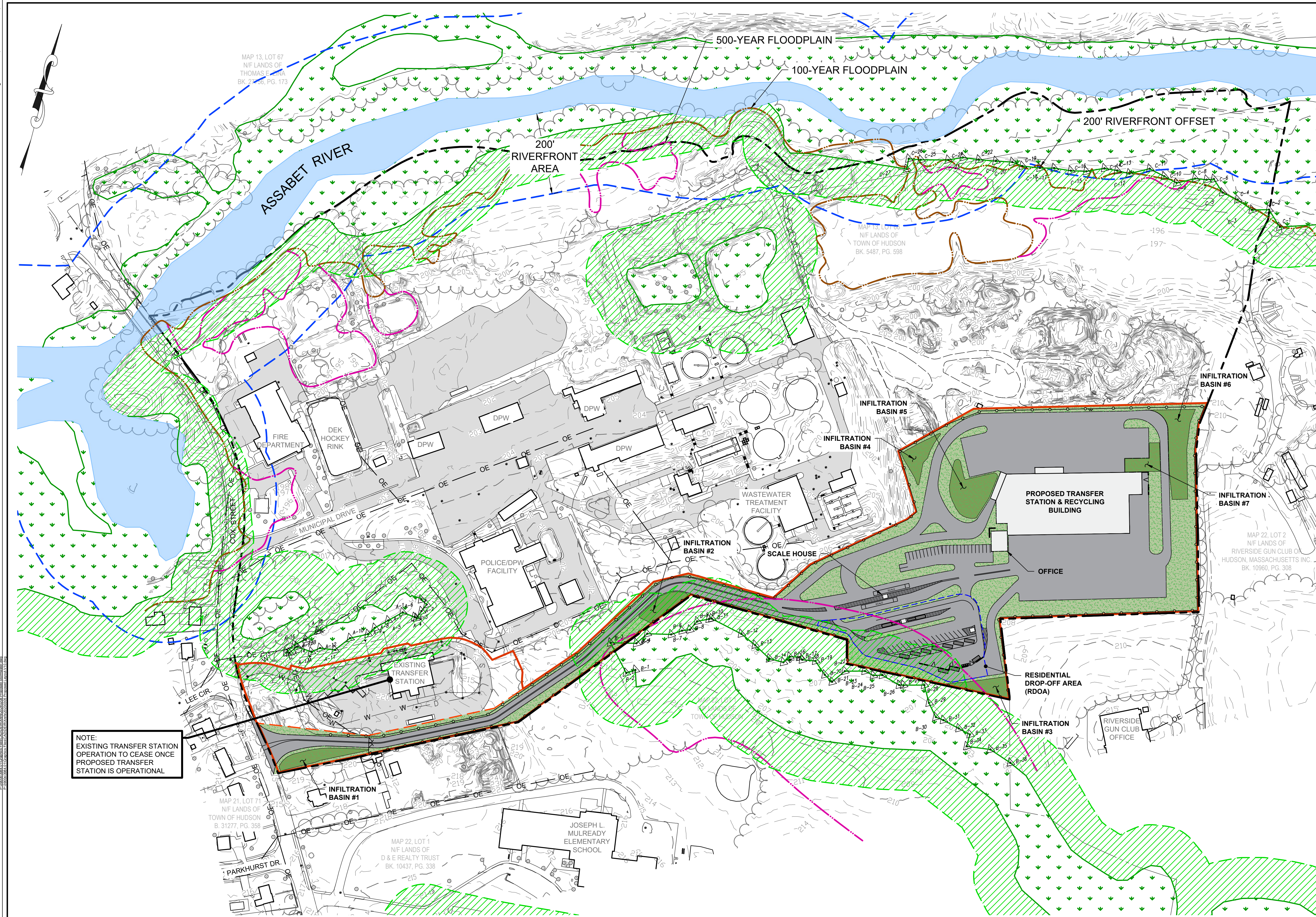
Several modeling assumptions inherent in the ISO 9613-2 calculation methodology, or selected as conditional inputs by Epsilon, were implemented in the CadnaA model to ensure conservative results (i.e., higher sound levels), and are described below:

- All modeled sources were assumed to be operating simultaneously. This scenario corresponds to the greatest sound level impacts which will be a rare occurrence.

- As per ISO 9613-2, the model includes favorable conditions for sound propagation, corresponding to a moderate, well-developed ground-based temperature inversion, as might occur on a calm, clear night, or equivalently downwind propagation.

- Meteorological conditions included in the model (T=10°C/RH=70%) were selected to minimize atmospheric attenuation in the 500 Hz and 1 kHz octave bands where the human ear is most sensitive.

- No attenuation due to tree shielding, air turbulence, or wind shadow effects was considered in the model.



NOTES:

1. TOPOGRAPHY, EXISTING SITE FEATURES AND PROPERTY LINE SURVEY WERE PROVIDED TO SANBORN HEAD BY CONTROL POINT ASSOCIATES, INC. (CONTROL POINT) OF SOUTHBOROUGH, MA IN AN ELECTRONIC FILE TITLED "03-180244-01 - BTU REV 1 (ISSUED 2023-03-17).dwg". ELECTRONIC FILE DEPICTS INFORMATION SHOWN ON DRAWINGS TITLED "BOUNDARY & TOPOGRAPHIC SURVEY", SHEETS 1 THOUGH 8, DATED MARCH 17, 2023 PREPARED BY CONTROL POINT OF SOUTHBOROUGH, MA FOR SANBORN HEAD.

2. TOPOGRAPHIC INFORMATION SHOWN HEREON IS BASED ON THE FOLLOWING:

   A. AERIAL IMAGERY, DATED APRIL 21, 2018, PROVIDED BY EASTERN TOPOGRAPHICS OF WOLFBORO NEW HAMPSHIRE, AND AN ON-THE-GROUND FIELD SURVEY BY CONTROL POINT BETWEEN OCTOBER 11, 2018 AND OCTOBER 22, 2018; AND

   B. PLANIMETRIC AND TOPOGRAPHIC FEATURES COMPILED BY CONTROL POINT USING PHOTOGRAMMETRIC METHODS FROM UAV PHOTOGRAPHY AND AN ON-THE-GROUND FIELD SURVEY BY CONTROL POINT ON JANUARY 3, 2023.

3. ELEVATIONS REFER TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88). HORIZONTAL DATUM IS REFERENCED TO THE NORTH AMERICAN DATUM OF 1983 (NAD83), MASSACHUSETTS STATE PLANE COORDINATE SYSTEM.

4. WETLAND INFORMATION WAS OBTAINED FROM MassGIS, EXCEPT IN THOSE AREAS SHOWN ON THE PLAN AS FOLLOWS:

   THE ABOVE LINE TYPE DESIGNATES THE LIMITS OF AN ON-THE-GROUND WETLAND DELINEATION PERFORMED BY EPSILON ASSOCIATES ON JANUARY 18 AND 22, 2023 AND FIELD LOCATED BY CONTROL POINT ON JANUARY 30, 2023.

5. ASSABET RIVER BOUNDARY WAS OBTAINED BY SANBORN HEAD FROM THE MassGIS HYDROGRAPHIC (WATER-RELATED) FEATURE DATA SET. HYDROGRAPHIC FEATURE DATA WAS LAST UPDATED BY MassDEP IN DECEMBER 2019.

6. FLOODPLAIN INFORMATION WAS OBTAINED FROM FLOOD INSURANCE RATE (FIRM) MAP FOR MIDDLESEX COUNTY, MASSACHUSETTS. MAP NUMBER 25017C0343F, MAP REVISED JULY 7, 2014.

LEGEND:

- EXISTING 5-FOOT CONTOUR
- EXISTING 1-FOOT CONTOUR
- PROPOSED 10-FOOT CONTOUR
- PROPOSED 2-FOOT CONTOUR
- PROJECT SITE AREA
- SITE PROPERTY BOUNDARY
- ADJACENT PROPERTY BOUNDARY
- WETLAND AREA
- WETLAND BOUNDARY (MASSGIS)
- SURVEYED WETLAND BOUNDARY (JAN 2023)
- 100-FOOT WETLAND BUFFER SETBACK
- ASSABET RIVER BOUNDARY
- 200-FT RIVERFRONT OFFSET
- 100-YEAR FLOODPLAIN
- 500-YEAR FLOODPLAIN
- PROPOSED CHAIN LINK FENCE

SANBORN HEAD

GRAPHICAL SCALE: 120' 60' 0' 120' 240'

NO.	DATE	DESCRIPTION	BY

DRAWN BY: A. WILKER
DESIGNED BY: S. WRIGHT
REVIEWED BY: D. LONG
PROJECT MGR: S. WRIGHT
PIC: S. WRIGHT
DATE: OCTOBER 2024

FINAL ENVIRONMENTAL IMPACT REPORT
B-P TRUCKING TRANSFER STATION AND RECYCLING FACILITY
HUDSON, MASSACHUSETTS

PROPOSED PROJECT LAYOUT

PROJECT NUMBER: 3984.01

FIGURE NUMBER: 6-1

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6.3 Sound Level Modeling Results

All modeled sound levels are A-weighted equivalent sound levels (L_{eq}, dBA). The predicted sound levels at the modeling locations range from 45 to 50 dBA with the roll-up doors open and interior equipment running. The highest predicted Project-only L_{eq} sound level at any modeling location is the school which is the closest property southwest of the proposed facility. The highest predicted Project-only L_{eq} sound levels at the nearest residences are 47 dBA at the residential receptors south and southeast of the facility. These sound levels do not include any contribution from existing sound sources in the area. Table 6-2 summarizes the modeling results for all modeled locations.

Table 6-2 Sound Level Modeling Results

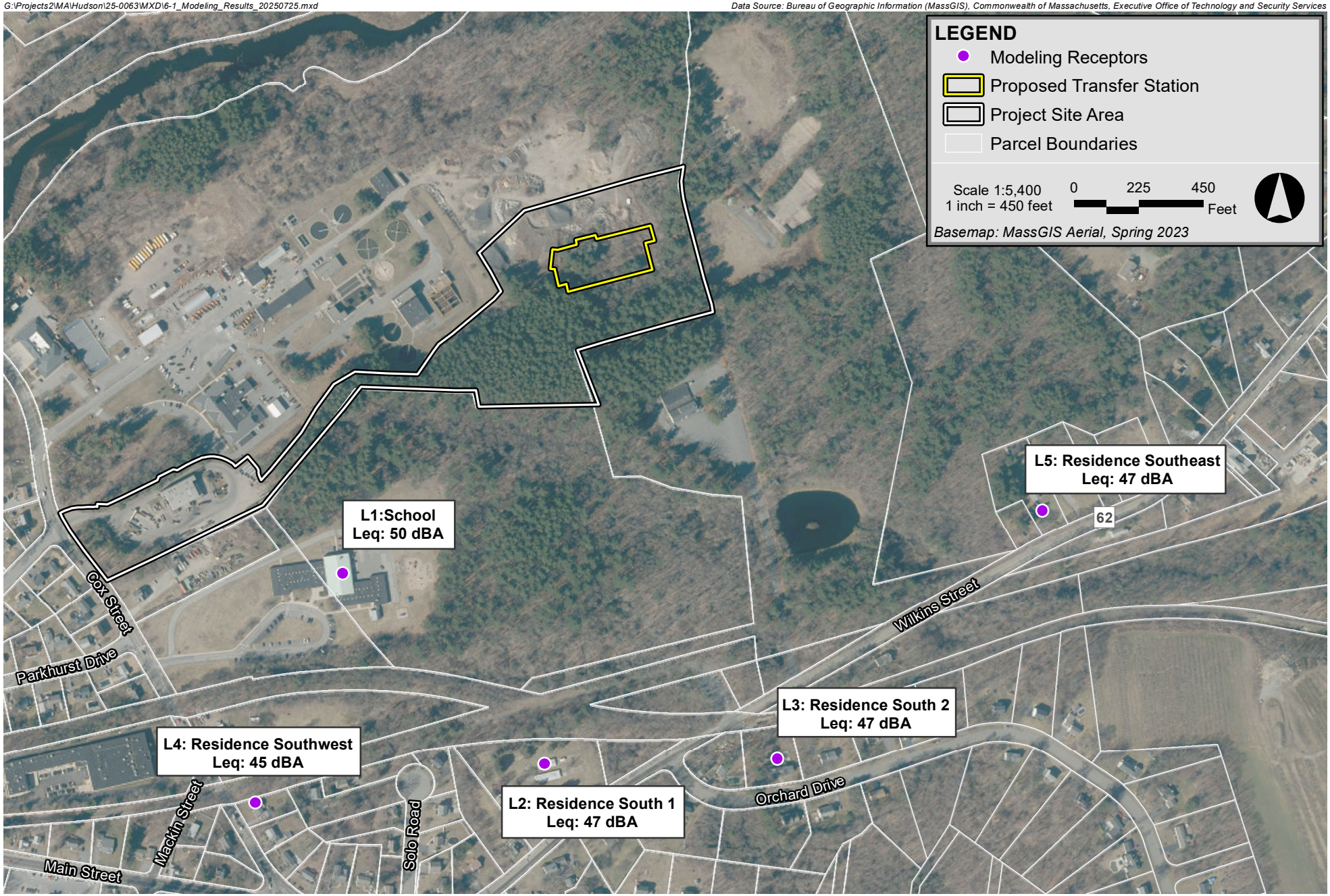
Receptor ID	Description	Project Only Sound Pressure Level, L_{eq}
		dBA
L1	School	50
L2	Residence South 1	47
L3	Residence South 2	47
L4	Residence Southwest	45
L5	Residence Southeast	47

Facility sound levels will likely be audible at the exteriors of the nearest residences, but the sound level will remain consistent with typical sound levels in small town residential communities. Modeled facility-only sound levels at the modeling locations are shown in Figure 6-2.

The analysis does not include or address reductions in sound levels associated with the elimination of the existing transfer station. That reduction in sound will reduce sound levels in residential areas, particularly to the west of the property.

G:\Projects2\MA\Hudson\25-0063\MXD\6-1_Modeling_Results_20250725.mxd

Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services



B-P Trucking Transfer Station and Recycling Facility Hudson, Massachusetts

Epsilon Associates Inc.

Figure 6-2
Modeling Results

7.0 SOUND LEVEL EVALUATION

Using the modeling described in Section 6, and evaluating proposed operations more broadly, Epsilon has evaluated whether reductions in sound levels at the Property could effectively reduce the potential for noise at the nearest sensitive receptors. Each option to reduce sound levels has either been implemented, is infeasible, or would be ineffective at significantly reducing sound levels at the residences. Some of the key options evaluated are as follows:

- **Facility Relocation**. *Implemented.* The proposed site significantly increases the distance to the nearest residences (from 506 feet to 1704 feet) with a corresponding reduction in sound impacts. Also, the number of residences within a 0.3 mile radius is reduced from about 70 to zero. Further reductions are not technically feasible. Other site constraints, including existing DPW operations and wetlands, preclude moving the operations further from residences.
- **Facility Reorientation**. *Infeasible.* The building orientation and traffic flow, as proposed, is optimized based upon a vehicle access corridor to the site that is aligned along the southern property line. This southerly corridor provides the only viable and dedicated access roadway to the back portion of the site that does not interfere with access to other existing on-site operations (DPW facility, public safety building, and wastewater treatment facility). Once past these existing operations, the site opens up at the easternmost end of the property, where the transfer station and residential drop-off area are proposed. With vehicles entering the facility area along the southerly property line, the optimal building layout is to have the front of the building (i.e. the side with the large overhead doors providing access to the tipping floor) facing south to receive the incoming vehicles. This is the layout as proposed. Reorienting the building so that the large overhead doors are facing north requires traffic flow to transition from the east-west direction along the southerly property line into a north-south direction in the facility area so that vehicles can enter the building from the north. This creates several limitations that significantly reduce the optimal layout of the proposed facility. These limitations include: the need to expand the development area by more than an acre to the north to provide access to the building and maintain sufficient trailer storage capacity; an increase in impervious surface of approximately 1 acre; significant additional fill requirements; a loss in employee parking, that if possible to replicate would need to be located remote from the office; loss of some stormwater management features; and the inability to segregate the residential drop-off area as effectively from commercial vehicles accessing the transfer station.
- **Changes to Operating Practices.** *Implemented.* The list of BMPs (Appendix A) documents how operations will be optimized to avoid and minimize noise impacts from trucks and equipment. Further, procedures will be implemented to identify noise-generating events and discuss potential solutions.
- **Operating Hours.** *Implemented.* Sound levels in the area tend to go down in the late afternoon (e.g., 4 pm to 6 pm) as activities in nearby facilities (e.g., DPW) wind down for the day. Per the list of BMPs, the Project activities will similarly be winding down in the late afternoon to generate less noise when background levels are low.
- **Keeping All Doors Closed.** *Infeasible.* The purpose of the transfer station is to transfer material, which requires moving material in and out of the building frequently. Epsilon also notes that much

of the sound will be from vehicle activity outside of the building, and keeping the doors closed would not mitigate that sound.

- **Closing Several Doors.** *Ineffective.* Using the techniques described in Section 6, Epsilon modeled hypothetical scenarios with different numbers of the loading doors closed. None of the scenarios showed a significant reduction in the predicted sound levels at the residences (i.e., all predicted reductions were less than 3 dBA). Similarly, curtains that could be driven through would not significantly reduce predicted sound levels at the residences.
- **Sound Barriers Near the Operations.** *Infeasible.* Epsilon reviewed several options for nearby sound barriers with the project team. In each case, the barrier would prevent the movement of material through the transfer station or would present a safety risk by blocking line-of-sight for the moving of heavy equipment.
- **Sound Barriers Near the Property Line.** *Ineffective.* Epsilon modeled several different locations, dimensions, and characteristics for sound barrier walls. None of the scenarios showed a significant reduction in the predicted sound levels at the residences (i.e., all predicted reductions were less than 3 dBA).
- **Sound Dampening on the Building Façade.** *Ineffective.* Epsilon modeled different types of sound-dampening material that could feasibly be added to the outside of the building to dampen sound and minimize reflection of sound. None of the scenarios showed a significant reduction in the predicted sound levels at the residences (i.e., all predicted reductions were less than 3 dBA).

8.0 CONCLUSIONS

A comprehensive sound level modeling assessment was conducted for the proposed transfer station. Results of the sound level assessment demonstrate that the sound levels from the Project will not present a danger to public health, safety, or the environment.

The highest predicted Project only L_{eq} sound level at a residence is 47 dBA. That is generally consistent with sound levels at a small-town residential area, and does not present a danger to public health, safety, or the environment.

Epsilon has prepared a list of BMPs (Appendix A) which will be used to achieve compliance with the relevant approval standards for noise. That list describes programming elements and operational practices to minimize noise, plans to identify and respond to noise problems, and options that will be available to retrofit the facility to address any noise issues that arise.

Appendix A

Odor and Noise Best Management Practices

ODOR AND NOISE BEST MANAGEMENT PRACTICES

Hudson Solid Waste Transfer Station and Recycling Facility
Hudson, Massachusetts

Prepared for:

Sanborn Head & Associates, Inc.
6 Bedford Farms Drive
Bedford, NH 03110

Prepared by:

Epsilon Associates, Inc.
3 Mill & Main Place, Suite 250
Maynard, MA 01754

September 22, 2025

TABLE OF CONTENTS

LIST OF ATTACHMENTS

1.0 INTRODUCTION

Epsilon has prepared this list of Best Management Practices which will be used to achieve compliance with the relevant approval standards for odor and noise associated with the Request for Minor Modification to Site Assignment (the "Request") by B-P Trucking, Inc. and Hudson Department of Public Works (the "Proponents") for the property located at 1 Municipal Drive (also referred to as 300 Cox Street), Hudson, Massachusetts (the "Property"). The Minor Modification to Site Assignment is required because the existing site assignment does not stipulate a capacity or total volume limit, and the Proponents intend to increase the permitted capacity to 850 tons of solid waste per day.

2.0 ODOR REDUCTION & MITIGATION BEST MANAGEMENT PRACTICES

2.1 Programming Elements

1. The design, location, and capacity of the planned permanent odor and dust control misting system. This BMP will be implemented with initial operation. Permanent misting systems will be located in the ceiling of the MSW tipping floor and trailer pit areas. Misting systems will be designed to be operational as necessary throughout the year.

    a. The proposed misting system will consist of three fog cannons that will provide odor and dust control coverage for the MSW and C&D tipping floor and trailer pit areas. Two fog cannons will be located above the overhead doors that provide access onto the tipping floor and a third will be installed in the northwest corner of the building to provide coverage of the tipping floor and the two trailer pits.

    b. The fog cannons, which can be operated in both stationary and oscillating mode, will be connected to a central pump/deodorizer/control station via high pressure hydraulic piping. The system will be installed with auto drain lines at the low point in the hydraulic feed lines. These will drain the pumps and feed lines to prevent freezing, allowing the system to operate throughout the year without requiring deactivation during the winter months.

2. When considering the flow of solid waste through the Station, the following BMPs will be implemented with initial operation based on their having been factored into the facility design:

    a. Evaluating the dimensions of the building(s) to ensure capacity to allow indoor handling of all waste;

    b. Evaluating the prevailing wind direction to determine building orientation and setback to adjacent properties. The tipping floor roll-up doors are oriented away from prevailing winds and to avoid creating a “wind tunnel” affect within the interior spaces. Prevailing winds are most frequently from the west, and tipping doors open to the southeast.

    c. Carefully orienting the building and its doorways with respect to odor-sensitive neighboring property and closing as many doors as practical during operating hours.

3. Designing floors for easy cleanup, including a concrete surface with a positive slope to collection systems. This BMP will be implemented with initial operation. Steps will be taken to eliminate crevices, corners, and flat surfaces, which are harder to keep clean and where waste residue can accumulate.

    a. Regular inspection and cleaning of tipping floor trench drains to remove odor-producing residues.

a. Paving of outdoor areas for ease of cleaning by street sweeper.

4. Exhaust ventilation. This BMP will be implemented with initial operation. The building's ventilation system will be designed to account for considerations such as odor and dust control, as well as management of emissions from mobile equipment operating on the tipping floor. Air filtration options and ventilation needs, including the location of ventilation components such as air intake louvers and exhaust fans, will be identified as part of the mechanical system design for the building.

5. No open outdoor storage. This BMP will be implemented with initial operation. The outdoor residential drop-off compactors will be closed systems, and any temporary outdoor trailer storage/staging will be in tarped trailers.

    a. As part of normal facility operations, storage of material within the building will occur overnight and material stored overnight will be loaded into trailers the following operating day. Other overnight storage would occur when needed for holding full trailers before transporting them off-site. Under normal operations, this temporary full vehicle layover would typically not exceed 24 hours, except for trailers filled towards the end of a Friday and requiring storage until the following Monday (weekend holdover).

2.2 Operating Practices

1. Exhaust ventilation maintenance. This BMP will be implemented with initial operation. Ventilation systems, including fans, will be operated and maintained according to manufacturer's specifications. Any filters will be replaced at frequencies recommended by manufacturers.

2. Indoor waste handling. This BMP will be implemented with initial operation. To minimize odor generation from the operation, all processing, tipping, sorting, storage, and loadout will occur within the enclosed building. Transfer trailers will be tarped prior to exiting the trailer pits. Then trailers will weigh and exit the site.

    a. Residential MSW drop-off will be performed in the residential drop-off area at the stationary compactors, which themselves will provide odor control through the fully enclosed containment of the residential MSW waste stream.

    b. The quantity of material in the building is not expected to exceed one day's worth of permitted capacity.

3. Operator procedures to inspect the Station, identify needed cleanups and maintenance, and promptly implement needed cleanups and maintenance. This BMP will be implemented with initial operation. Inspection rounds (Attachment 1) will be scheduled so that operators may identify conditions which may cause an odor throughout the day. Potentially odorous conditions may include waste which has been onsite for longer than planned or liquid that has dripped onto floors. Conditions requiring maintenance include any issues with doors, ventilation, or misting systems.

4. Use of the street sweeper. This BMP will be implemented with initial operation. Any material tracked out of the building will be swept up promptly. B-P will dispatch a heavy-duty nylon bristle street sweeper for the regular dry cleaning of paved travel ways as needed.

    a. Hoses located near the tipping floor doors will be used to wet the tipping floor to conduct a wet sweep as needed.

    b. The heavy-duty rubber edge of the loader bucket also cleans the floor by pushing materials and residues like a squeegee.

5. First-in, first-out processing. This BMP will be implemented with initial operation. All waste will be removed from the facility within 24-72 hours of arrival, accounting for weekend holdover.

    a. As an exception to the "first-in, first-out" waste transfer policy, odorous waste loads, such as food waste, will take priority when loading trailers for off-site material disposal. B-P and third-party drivers are encouraged to provide advanced notice of incoming odorous loads so that any such loads can be immediately transferred into an awaiting trailer.

6. Instructions to Proponent and third-party haulers outlining queuing best practices and truck cleaning requirements to avoid liquid dripping outside of the building. See Attachment 3. This BMP will be implemented with initial operation.

7. Handling of liquids. This BMP will be implemented with initial operation. All unloading and handling of waste will be performed within the building, which will prevent the creation of potentially odiferous liquids because precipitation will not come in contact with materials in the building. Floor drains located within the building will discharge to an oil/water separator prior to conveyance to Hudson's wastewater treatment plant. The trench drains will be installed with in-line trash buckets designed to collect debris washed from the trench channels.

    a. Keeping building floor drains clean so odor-causing residues do not build up. This BMP will be implemented with initial operation. Floor trench drains and their trash buckets will be inspected daily and hoses will be used to flush out the drains when needed. Floor drains will discharge to the building's sanitary sewer system, which will convey floor drain flow to the nearby wastewater treatment plant.

8. Cleaning of the tipping floor. This BMP will be implemented with initial operation. The tipping floor will be cleared of solid waste for occasional floor washdown as needed. The optimum cleaning time would likely be later in the day when incoming truck counts are low.

9. Maintaining a clear distance from the tipping floor roll-up doors inward which is clear and free of waste. This BMP will be implemented with initial operation. Establishing a clear space will avoid situations where the loader needs to exit the building for clean-up. The tipping floor area has been sized to provide a sufficient vehicle access corridor within the building to accommodate a solid waste collection vehicle fully within the building while storing a peak day's capacity.

2.3 Plans to Identify and Respond to Odor Problems

1. Evaluating and addressing odor complaints received via a hotline telephone number which will connect to the operators on shift. This BMP will be implemented with initial operation. By gathering as much information as possible about the conditions that created the odor problem as soon as possible, B-P can take focused action to eliminate recurrence.

    a. The hotline call intake sheet, Attachment 2, includes fields for asking callers to describe the odor and its intensity and persistence. The sheet also has space for documenting complaint location, time of complaint, and weather conditions.

    b. Odor inspection process in response to any complaints from the general public should include identification of wind direction and other weather conditions, identification of odorous loads, and investigation of odor at the property line in the direction of the complaint and at the location of the complaint.

    c. Maintain an odor complaint log recording all information collected during intake process, which can be compared to operational logs to find potential causes of reported odors.

2. Maintaining an onsite weather station. This BMP will be implemented with initial operation. Collecting real-time weather data, such as wind speed and direction, will allow for quick determinations of whether an odor experienced at a residence could be resulting from the transfer station or from another source, such as the nearby wastewater treatment facility, to improve response actions.

3. Recordkeeping of operating data which may help to indicate the cause of an odor condition, such as security video footage and truck and trailer scale records. This BMP will be implemented with initial operation.

4. Systems to implement responses to complaints. This BMP will be implemented with initial operation. Possible action to address reported odors could include instructing customers not to send certain waste or increasing floor cleaning frequency.

5. Operator procedures to identify odiferous loads and expedite processing or divert the loads. This BMP will be implemented with initial operation. Odiferous or putrescible loads will be identified by operators, if not identified in advance by drivers, and removed from the station in no more than 24 hours.

6. B-P will add an odor mitigation portion to the existing monthly safety meetings. Meetings will emphasize the need to avoid odors and encourage feedback regarding specific activities or events that could produce odor. Employees will be asked to think about potential odor issues and solutions and given a communication pathway to provide those thoughts to management. Subsequent meetings will follow-up on feedback received and ask for any additional thoughts.

7. B-P will develop an odor mitigation training module and train all new employees on the odor mitigation module once it is developed. Training will include protocols for recordkeeping, odor identification, and odor response.

2.4 Retrofit Options

1. Use of portable foggers/misting systems in addition to the permanent systems. This BMP will be implemented as appropriate should an odor issue arise. Options include:

    a. Local fogging systems

    b. Building-wide fogging systems

    c. Odor control additives [Fogco or equivalent; B-P will evaluate the effectiveness of different vendor's options in treating the specific odor issue]

2. Upgrade of sweeper. This BMP will be implemented as appropriate should an odor issue arise. Replacing the current nylon brush street sweeper with one that has a water holding tank may allow for easier wet cleaning of the tipping floor if hoses are found to be insufficient.

3. Exhaust ventilation for dispersion. This BMP will be implemented as appropriate should an odor issue arise. Improving ventilation would be helpful if there is an odor issue close to the facility. In that case, enhanced capture could be achieved by replacing the fans, and enhanced dispersion could be achieved by increasing exhaust height. The larger fans would be designed to maintain a face velocity of 100 feet per minute at open doors to help ensure that odors are captured by the building ventilation system. The exhaust point(s) would be designed to improve dispersion and avoid the potential for downwash.

4. Door dimensions and opening and closing cycle times; some doors may be closed during periods of low vehicle visits to the facility and as appropriate to direct vehicles to portions of the tipping floor where drop-off activities may be preferred as part of the overall management of materials delivered to the building. This BMP will be implemented as-needed. Utilize high-speed roll-up doors for incoming trucks when justified based on traffic activity/utilization (doors that can remain closed for the majority of time but not all the time).

    a. There are six roll-up doors which will allow access to the MSW and C&D tipping floor area and two roll-up doors which allow access to the recyclables processing portion of the building. All doors are on the southern wall of the building. The C&D and MSW tipping floor doors are expected to be open for use frequently. The recycling doors may be better candidates for replacement with high-speed roll-up doors.

5. Treating floor drainage systems periodically with odor-neutralizing and bacteria-inhibiting solutions. This BMP will be implemented as appropriate should an odor issue arise.

6. Requesting that customers not deliver certain highly odorous wastes, for example, food waste that has been allowed to putrefy. This BMP will be implemented as appropriate should an odor issue arise, particularly if one customer is found to be a recurring problem

3.0 NOISE REDUCTION & MITIGATION BEST MANAGEMENT PRACTICES

3.1 Options to Reduce Sound Levels

1. The building has been sized to ensure capacity to allow indoor handling of all waste. Accordingly, this BMP will be implemented with initial operation. To minimize noise outside of the building, all tipping, sorting, storage, and loadout will occur within the enclosed building.

2. Arranging the facility layout to eliminate steep uphill grades for waste-hauling trucks, as driving uphill can significantly increase noise levels. This BMP will be implemented with initial operation. The site has been designed so that visiting trucks do not need to drive on steep grades.

3. All collection vehicles owned by B-P, as well as those used in the operation of the facility, shall have "white noise" back-up alarms rather than traditional beepers. This BMP will be implemented with initial operation. B-P may also consider using beeper alternatives such as strobe lights and proximity detectors.

    a. Any traditional back-up alarms which must be used will be set at the lowest levels allowed by OSHA and local regulations.

    b. Note that backup beepers are expected to be the only possible source of a pure tone onsite. No other aspects of operation or traffic will generate a pure tone.

4. Conducting activities that generate the loudest noise during selected hours, such as the morning or afternoon commute hours, when adjoining properties are unoccupied, or when offsite background noise is at its highest. This BMP will be implemented with initial operation.

    a. Under normal conditions, outdoor operations, will be limited to daytime hours, 7 am to 5 pm, when the facility is open to the public.

    b. Evening activity (5 pm to 6 pm) will be limited as much as possible and focused on end-of-day shutdown activities, including some material handling within the building and cleaning practices associated with routine housekeeping activities.

    c. The only regular nighttime noise sources are expected to be the building's exhaust fans, which may operate continuously. If odorous loads are delivered at the end of a day or approaching a weekend holdover, evening activity may include loading odorous waste into a trailer, and nighttime activity may include cleaning activities.

5. Truck standards communicated to third parties. This BMP will be implemented with initial operation. B-P will generate and supply training handouts (Attachment 3) for third-party truck drivers with steps that they should be taking in order to reduce and mitigate noise to the greatest extent possible. Noise restrictions will include:

a. Avoid traffic flows adjacent to noise-sensitive property.

b. Obey speed limits

c. Drop loads slowly

d. No idling more than 5 minutes

e. Do not slam doors or gates

f. No use of jake brakes

g. No revving the engine

h. Limit horn use to emergencies

i. Back-up only when needed

6. Facility-wide, B-P will ensure equipment is not idling when not actively being used. This BMP will be implemented with initial operation. B-P will ensure that diesel or gasoline powered equipment will not be allowed to idle when not actively being used. Training material will include instructions to avoid idling when not active.

7. B-P will ensure that all vehicles and equipment are operated and maintained per the manufacturer's specifications. This BMP will be implemented with initial operation. Properly maintaining mufflers and engine enclosures on mobile equipment operating within the transfer station. B-P will insist that operators of commercial hauling vehicles keep their equipment, including the muffler systems, in good repair.

3.2 Plans to Identify and Respond to Noise Problems

1. Identification of all noise-generating activities. This BMP will be implemented with initial operation. Expected noise-generating equipment on site is as follows:

    a. Tipping of waste onto the tipping floor and loading material into trailers

    b. Loaders

    c. Excavators

    d. Handling and baling of recyclables in the building

    e. Residential compactors

f. Beyond these specific sources, there are other noise-generating sources typical to an industrial material handling operation. These include delivery trucks, yard maintenance vehicles, employee vehicles, etc.

2. B-P will implement video monitoring of operations. This BMP will be implemented as appropriate should a noise issue arise. B-P will place security-style cameras with several days of recording capacity providing an overall view of the facility. B-P will review periods of footage that align with specific noise complaints and interview staff, if appropriate, to attempt to identify what activity caused an elevated noise level. If this review identifies an onsite B-P activity that could be causing elevated offsite noise, B-P will review options to avoid, minimize, or mitigate the noise-generating activity.

3. Evaluating and addressing noise complaints received via a hotline telephone number which will connect to the operators on shift. This BMP will be implemented with initial operation. By gathering as much information as possible about the conditions that created the noise problem as soon as possible, B-P can take focused action to eliminate recurrence.

    a. Complaint Intake Process: asking hotline callers to describe the sound and its intensity and persistence. Documenting complaint location, time of complaint, and weather conditions

    b. Maintain a complaint log recording all information collected during intake process, using the sheet included as Attachment 2, which can be compared to operational logs to find potential causes of reported noise conditions

4. B-P will add a sound mitigation portion to the existing monthly safety meetings. Meetings will emphasize the need to avoid potentially objectionable noise, and to encourage feedback regarding specific activities or events that could produce excessive noise. Employees will be asked to think about potential noise issues and solutions and given a communication pathway to provide those thoughts to management. Subsequent meetings will follow up on feedback received and ask for any additional thoughts.

5. B-P will develop a noise mitigation training module that discusses operational noise. B-P will train all new employees on the noise mitigation module once it is developed. Training will include protocols for recordkeeping, noise identification, and noise response.

3.3 Retrofit Options

1. Door dimensions and opening and closing cycle times; some doors may be closed during periods of low vehicle visits to the facility and as appropriate to direct vehicles to portions of the tipping floor where drop-off activities may be preferred as part of the overall management of materials delivered to the building. This BMP will be implemented as-needed should a noise issue arise from within the transfer station building that is detected offsite. Increased door closure may be

accomplished by revising operating practices or by installing high-speed roll-up doors, if necessary.

a. High-speed roll-up doors are only recommended when truck traffic dictates that doors can remain closed for the majority of time but not all the time. There are six roll-up doors which will allow access to the MSW and C&D tipping floor area and two roll-up doors which allow access to the recyclables processing portion of the building. All doors are on the southern wall of the building. The six tipping floor doors are expected to be open for use frequently. The recycling doors may be better candidates for replacement with high-speed roll-up doors, as needed if noise issues arise from within the transfer station building.

Attachment 1

Odor & Noise Inspection Checklist

Odor & Noise Inspection Checklist

Name: Date:

Time:

Conduct facility walk-through to determine whether corrective action is necessary to maintain the conditions listed below. Complete corrective actions as soon as possible.

Condition	Corrective action needed? Y/N
All roll-up doors are in good repair and are able to open and close to accommodate trucks	
Building ventilation is in good repair and active during operational hours	
Misting system is in good repair and active during operational hours	
All fog cannons are in good repair and active during operational hours	
No trash is found outside of the building	
Waste deposited on the tipping floor is kept clear from the path of entering vehicles so that a sufficient access corridor is maintained that allows, at minimum, the full length of the vehicle to enter the building	
Outdoor compactors and compaction containers are properly coupled to prevent leaking or dripping	
Building floor drains are not blocked	
No liquid is dripping from waste or trucks onto floors inside the station	
No waste has been onsite for more than 24 hours, unless for weekend holdover (72 hours maximum)	
No odor is detectable at the station perimeter	
All equipment (compactors, vehicles, loaders, excavators) is in good repair and not making any unexpected noises	

List any corrective actions taken during inspection walk-through:

List any corrective actions submitted as maintenance request to be completed:

Attachment 2

Hotline Call Intake Form

Hotline Call Intake Form

When a phone call is received, politely ask callers for the information in **bold** and write their responses. Please fill in the remaining information right after the call is complete.

Operator name:		**Caller name:**	
Date:		Call time:	
Address of complaint:			
If caller would like to be contacted for follow-up, contact info:			
Wind Direction:	Wind Speed:	Temp:	Precipitation:
If an ODOR complaint, what does it smell like (sewage, solvents, rotten food)?		**If a NOISE complaint, what does it sound like (engines, shattered glass, beeping)?**	
Is it very strong/loud? Where does it seem to be coming from?			
How long has the odor/noise been happening today? Is it constant? Has it ever been noticed before?			
If a BP employee goes to investigate the complaint location, property line, possible sources of the problem, or any other areas, please complete the fields below:			
Locations checked:	*Time:*	*Describe odor/noise, if any:*	

Attachment 3

Third-Party Driver Handout

Third Party Driver Handout

Please follow the guidelines below while onsite at BP Hudson and while driving to & from the facility:

- If you know you are carrying an odorous load (ex: old food waste), please call **(508) 231-1000 x1136** or **(978) 567-9694** so that operators at the facility can prepare for efficient handling and disposition of the material
- Queue only in the designated area, along the facility's access road
- Avoid traffic flows adjacent to noise-sensitive property
- Obey speed limits
- Drop loads slowly
- No idling in excess of 5 minutes
- Do not slam doors or gates
- No use of jake brakes
- No revving the engine
- Limit horn use to emergencies
- Back-up only when needed
- After dropping off waste, if needed rinse trucks inside the building to remove any liquid that may drip when departing the building
- Vehicles must be maintained in good repair, including muffler systems