

Environmental Justice Screening Form

Project Name	Permit Modification at United Material Management of Leominster, LLC
Anticipated Date of MEPA Filing	September 3, 2024
Proponent Name	United Material Management of Leominster, LLC
Contact Information (e.g., consultant)	<p>Environmental Consultant: Laura Bugay, PE Green Seal Environmental, LLC l.bugay@gseenv.com 508-888-6034</p> <p>Community Involvement Contact: UMM of Leominster Mary Urban, Senior Director of Communications and Community Relations comms@win-waste.com (866) 946-9278</p>
Public website for project or other physical location where project materials can be obtained (if available)	www.ummlleominster.com
Municipality and Zip Code for Project (if known)	Municipality: Leominster, MA Zip Code: 01453
Project Type* (list all that apply)	Solid Waste, Industrial
Is the project site within a mapped 100-year FEMA flood plain? Y/N/ unknown	No
Estimated GHG emissions of conditioned spaces (click here for GHG Estimation tool)	<p>N/A, as there will be no modification to existing facility/conditioned spaces.</p> <p>The existing facility was constructed in 2019-2020 with three conditioned spaces including the employee facility trailer, offices, and scale house. According to the GHG estimation tool, these spaces currently generate 13 tons per year of CO₂ emissions (less than 2 single-family houses). No changes are proposed.</p>

Project Description

1. Provide a brief project description, including overall size of the project site and square footage of proposed buildings and structures if known.

United Material Management of Leominster (UMML) is a state-of-the-art municipal solid waste (MSW) and construction & demolition (C&D) waste handling and transfer station with an integrated rail line. The facility, located at 200 Tanzio Road in Leominster, Massachusetts, specializes in the recycling of C&D debris and the transfer of residuals for responsible end disposal.

In order to meet the growing demand for waste handling in Massachusetts, UMML is proposing a project, subject to Massachusetts Environmental Policy Act (MEPA) review, that will increase the handling capacity at its current facility in Leominster. The facility will not require any building expansion to accommodate the increased handling capacity. The facility is currently permitted to process up to 1,000 tons of waste per day (TPD). This project would increase that capacity to 1,500 TPD.

The UMML facility is located on a 13.46-acre parcel of land within an Industrial Park and includes an access driveway, parking areas, and an existing 32,500-square-foot building with a metal frame and sheathing. Even with this proposed capacity increase, all waste handling functions will continue to be performed entirely within the existing material processing building and its confines, including tipping and inspection, temporary waste storage, and outbound rail and truck loading. C&D processing activities will continue to utilize sorting equipment for the removal and recovery of recyclables. The facility will continue to predominantly ship material for end disposal via rail, the least carbon-intensive mode for land transport.

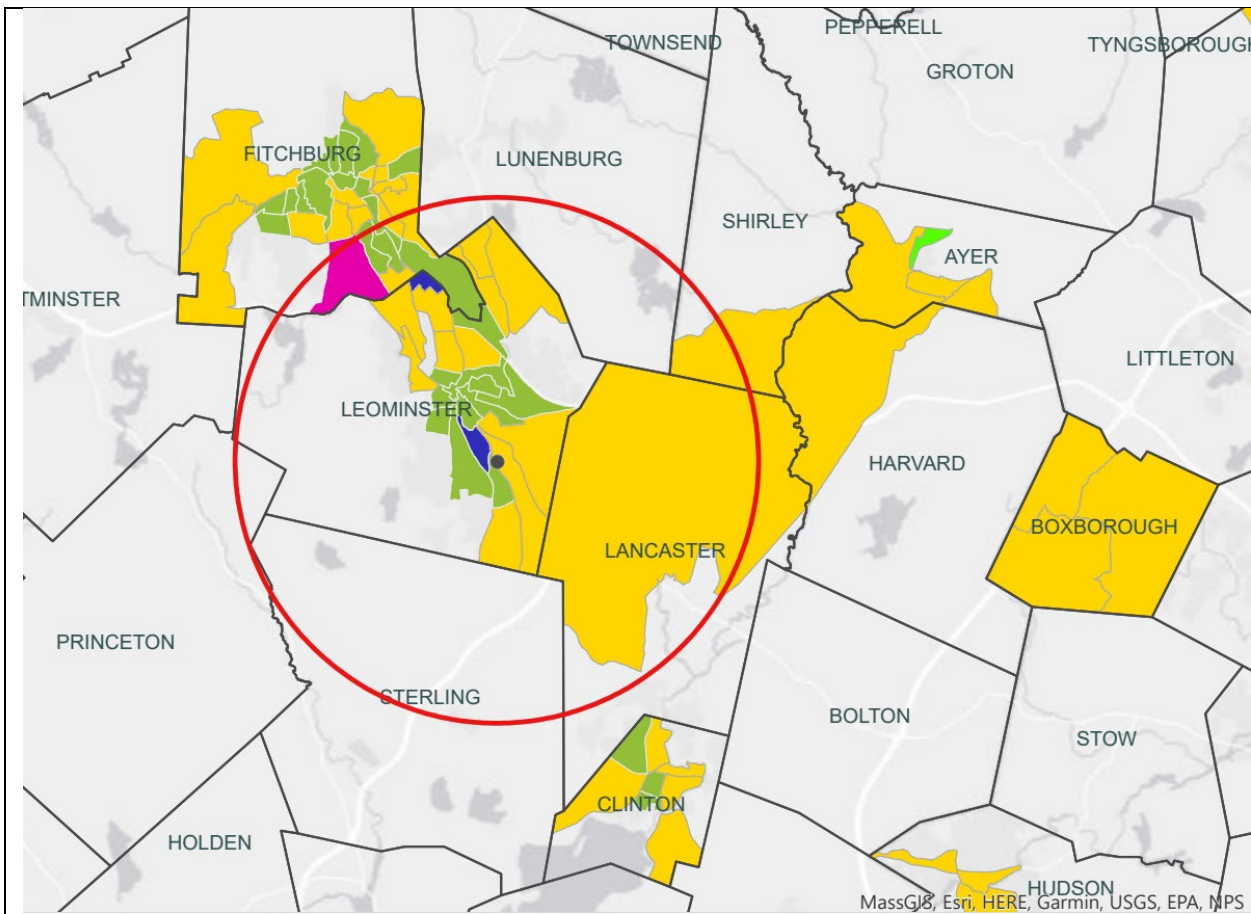
2. List anticipated MEPA review thresholds (301 CMR 11.03) (if known)

(9) Solid Waste

3. List all anticipated state, local and federal permits needed for the project (if known)

Local: Leominster Board of Health – Major Modification to an Existing Site Assignment
State: MassDEP Site Suitability (BWP SW 38); MassDEP Permit Modification (BWP SW 07)

4. Identify EJ populations and characteristics (Minority, Income, English Isolation) within 5 miles of project site (can attach map identifying 5-mile radius from [EJ Maps Viewer](#) in lieu of narrative)



- UMML site
- 5-mile radius
- Minority
- Minority and income
- Minority, income, and English isolation
- Minority and English isolation

5. Identify any municipality or census tract meeting the definition of “vulnerable health EJ criteria” in the [DPH EJ Tool](#) located in whole or in part within a 1 mile radius of the project site

The DPH EJ Tool shows that the City of Leominster contains one Vulnerable Health EJ neighborhood, for heart attack criteria. The Lancaster municipal boundary is within 1 mile of the project although Lancaster does not have any Vulnerable Health EJ criteria.

6. Identify potential short-term and long-term environmental and public health impacts that may affect EJ Populations and any anticipated mitigation

There will be no physical building expansion to the existing facility for this project. The potential environmental and public health impacts to the local EJ Population are expected to be limited to that associated with traffic, however, will not necessarily lead to more vehicles in the surrounding EJ areas. There will be more vehicle activity with the increased capacity but mainly at the facility.

The facility provides a local outlet for locally generated waste so that vehicles already travelling on local roads won't have to travel as far to dispose/recycle waste materials, which saves fuel and reduces emissions. The increased vehicle activity and the associated emissions will be mitigated through compliance with MassDEP's Anti-Idling law, Tier IV-compliant vehicle usage, and facility design that includes two truck scales to minimize time trucks are on site and air handling systems for equipment operating inside. EPA's March 2024, Greenhouse Gas Emissions Standards for Heavy Duty Vehicles – Phase 3 Rule will further regulate GHG emissions from refuse and tractor trailer heavy duty trucks starting in 2027 that will further reduce GHG emissions associated with this project.

The facility's advanced Best Management Practices for air quality include:

1. Enclosing all tipping, handling, and loading operations within the handling building.
2. Utilizing a misting system in the handling building to control dust and odor.
3. Conducting daily cleanups and sweeping.
4. Using covered transportation for trucks and railcars.
5. Applying first in/first out procedures to reduce the time municipal solid waste (MSW) remains on site, minimizing the potential for nuisance conditions.
6. Using two vehicle scales to increase efficiency and minimize time trucks are on site.

UMML will continue to utilize advanced sorting equipment for the recovery of recyclables and use low-carbon rail for transport. These efficiencies preserve precious natural resources and reduce CO₂ emissions as moving waste by rail is four times more fuel efficient than using tractor trailers.

7. Identify project benefits, including "Environmental Benefits" as defined in 301 CMR 11.02, that may improve environmental conditions or public health of the EJ population

Key project benefits include:

Meeting the demand for waste management – The need for economical and environmentally-sensitive handling of both MSW and C&D waste in the City of Leominster is a critically-important, growing challenge. If its service capability is expanded under this project, the UMML facility will be able to better address that challenge for the city, its residents, and its businesses. Additionally, the facility will also be an important asset for the region's ability to provide an economically competitive and efficient means to manage C&D and MSW due to its unique use of rail for transport. This rail-served facility will allow the region to access disposal outlets that are generally not economically viable through traditional trucking alone.

It should also be noted that based on the inevitable closure of the Fitchburg/Westminster landfill and others, more disruptions in waste management across the region as well as the entire Commonwealth can be expected. This will place additional pressures on a statewide system that is already struggling to keep pace with demand. The UMML facility is perfectly positioned and able to alleviate some of that pressure with no new construction required.

Providing a driver for economic development – According to the Leominster Economic Development Office, industrial development in Leominster is a priority. This region continues to boast of a highly skilled workforce, particularly within manufacturing industries.

The existing UMML facility was approved for construction in 2019 and the current service expansion proposal will offer a unique opportunity to further both economic and environmental

goals without additional construction impact to the surrounding environment. It will create more employment opportunities for residents and grow the tax base.

Additionally, it is very likely that with the anticipated shortage of adequate disposal and landfill capacity in the future, exportation of waste will become more significant in Massachusetts. It is this fact that differentiates the UMML site from other waste handling facilities in that it has access to railway transport and can export waste with considerably less environmental impact than trucking transfer.

Increasing recycling – UMML specializes in the sorting and recycling of C&D materials and is a MassDEP-compliant C&D processor. An increase in permitted daily capacity would increase the quantity of materials the facility is recycling. The facility recovers hundreds of tons of recyclables each month. Asphalt, brick, concrete, cardboard, ferrous and non-ferrous metals, asphalt shingles, gypsum, tires, and wood are all sent to recycling facilities for reuse in new products — helping conserve our natural resources for future generations. What we cannot recycle is transferred to its final disposal by rail, the lowest carbon mode of land transport.

Reducing GHGs in the waste management handling process – The UMML facility is committed to sustainable business practices by taking the most efficient transport routes, recycling materials for reuse, and investing in sustainable technologies.

UMML's state-of-the-art waste handling process uses numerous GHG-reduction tactics to protect our planet, but the most impactful at this site includes consolidating waste prior to transport, using rail transport instead of traditional truck transport whenever possible, and diverting as much waste from near-capacity landfills via recycling, reuse, and recovery.

Rail transport is four times more efficient than trucking in terms of fuel use and emissions since trains can move a ton of freight more than 470 miles on a single gallon of fuel compared to trucks that can move the same for only 134 miles (approximately). Thanks to this fuel-efficient transport option at UMML, negative environmental impacts from traditional trucking such as the emission of diesel particulate, carbon dioxide, nitrogen oxides, and other greenhouse gases, are greatly reduced.

Protects open space – The existing UMML facility does not impact open space as it has adequate separation to any designated open space, is outside of mapped habitats, and is located in an existing industrial park that is zoned for this type of facility. By utilizing the existing facility, no new facility must be constructed. Therefore, no demand for additional land space is required to increase waste handling capacity.

8. Describe how the community can request a meeting to discuss the project, and how the community can request oral language interpretation services at the meeting. Specify how to request other accommodations, including meetings after business hours and at locations near public transportation.

A public meeting has been scheduled for Monday, July 22, 2024, at 6 p.m., in the Community Room at Leominster Public Library located at 30 West St, Leominster, MA 01453, which is within walking distance to bus stops along the MART Fitchburg/Leominster Bus Route System. More information about the meeting is included in the attached public meeting notice. To request language interpretation services at the meeting please email comms@win-waste.com. Please allow a two-weeks' notice prior to the meeting to request interpretation services.