

**PUBLIC PARTICIPATION PLAN**

**Applicant:**

Environmental Soil Management of New York, LLC

**Facility:**

Fort Edward Township, NY

**NYSDEC Application Number:**

5-5330-00038/00027

**As Required by:**

NYSDEC Commissioner's Policy Guidance CP-29

**Submitted to:**

New York State Department of Environmental Conservation

Region 5

232 Golf Course Road

Warrensburg, NY 12885

**Revision Date:**

September 24, 2024

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## List of Acronyms

<b>Acronym</b>	<b>Definition</b>
CP-29	Commissioner Policy 29, Environmental Justice and Permitting
NOCA	Notice of Complete Application
NYSDEC	New York State Department of Environmental Conservation
PEJA	Potential Environmental Justice Area
PPP	Public Participation Plan
PFAS	Per- and polyfluoroalkyl substances
AFFF	Aqueous Film Forming Foam
NYCRR	New York Codes, Rules & Regulations
RD&D	Research, Development & Demonstration
ESMI	Environmental Soil Management of New York, LLC
USEPA	United State Environmental Protection Agency
NYSDOT	New York State Department of Transportation
DAR	Division of Air Resources
NOCA	Notice of Complete Application

## 1. Introduction and Objectives

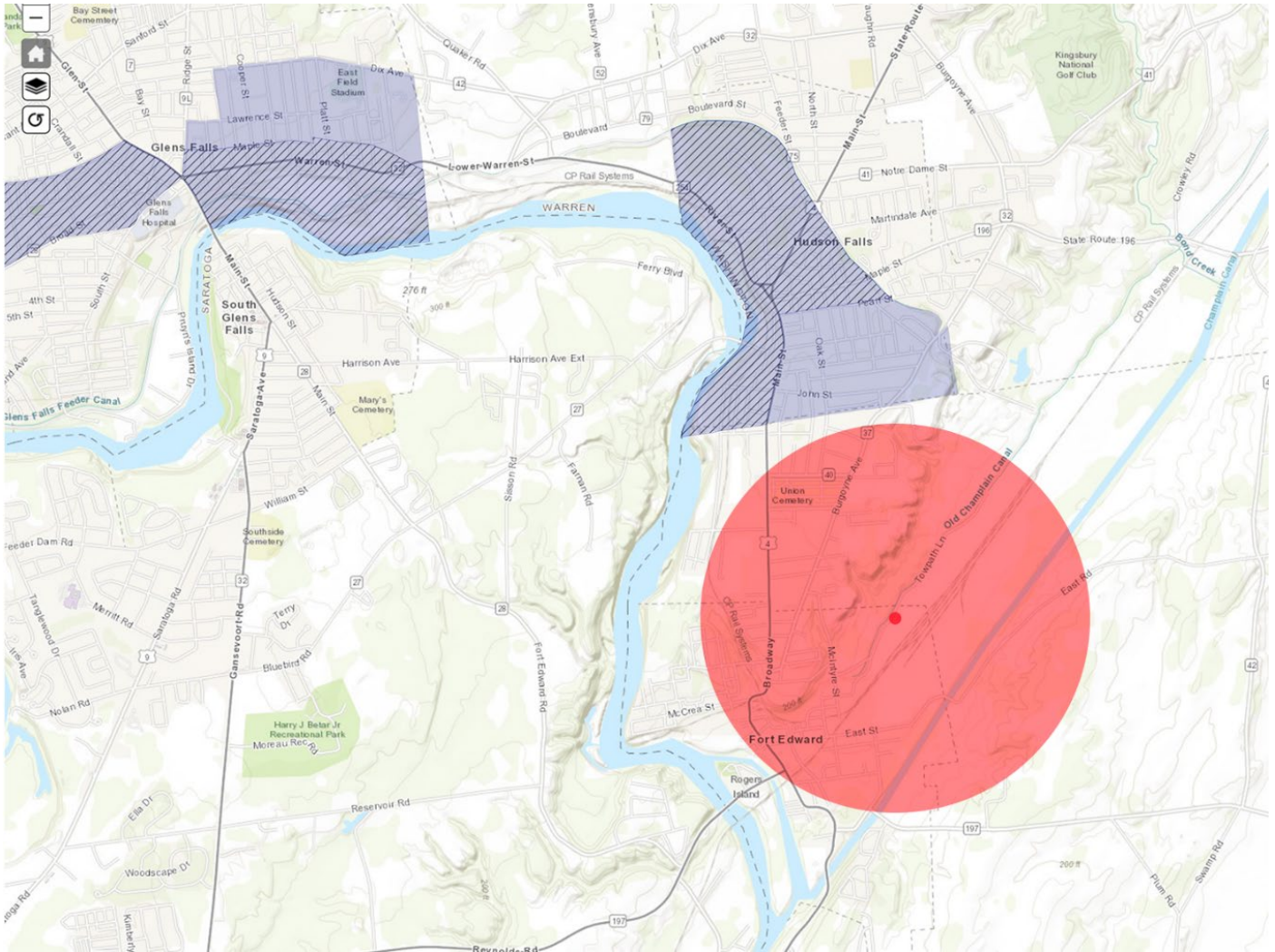
This Public Participation Plan (PPP) has been prepared to fulfill and comply with the requirements of New York State Department of Environmental Conservation (NYSDEC) Commissioner Policy 29, Environmental Justice and Permitting (CP-29) for Environmental Soil Management of New York, LLC (ESMI) in Fort Edward, New York and its Research, Development & Demonstration (RD&D) permit application 5-5330-00038/00027. As noted in a March 14, 2024, correspondence from the NYSDEC, there exists the presence of mapped DACs and mapped PEJAs in the area near the EMSI facility (See Figure 1).

ESMI proposes to accept and treat a new waste stream at an existing facility which may result in types and quantities of impacts, including air emissions, not previously noticed when the facility's existing permits were made available for public review and comment. As such the Department has determined that the proposed RD&D project should be treated as a major permit application, as allowed by 6 NYCRR § 621.3(b)(3), and subject to public review and comment.

This PPP has been developed in accordance with the procedures established in CP-29 Section V.D, and it aims to help ensure meaningful and effective public participation throughout the NYSDEC environmental permit review process. Public participation in the NYSDEC environmental permit review process means a program of activities that provides opportunities for stakeholders to be informed about and involved during the review of a proposed action.

The objective of this PPP is to outline and describe the program of activities that EMSI will implement to actively seek and enhance public participation during the review of its RD&D permit application.

**FIGURE 1 – 1-Mile Radius from Project Location**



## 2. Project Description and Proposed Action

The ESMI facility located at 304 Towpath Lane, Fort Edward Township, Washington County, New York, has operated as an employer, taxpayer, and a good steward to the environment and the local community since 1995.

ESMI remediates and cleans contaminated soil using a process known as thermal desorption. The soil comes from construction and remediation projects at former industrial, commercial and residential sites throughout New York and adjacent states, as well as emergency response actions initiated by New York State and other response teams. ESMI's work has helped Fort Edward and other communities in New York and throughout New England clean-up contaminated sites, minimize the disproportionate burden on disadvantaged communities, and return impacted property and soil back into productive use.

The soil is cleaned (or remediated) to meet state beneficial use criteria. The cleaned soil is then sold as a product for use in residential, commercial, and industrial applications. ESMI is regulated under NYSDEC regulations and holds permits from both the state's Solid Waste and Air Resources Divisions.

## 2.1. Project Overview

ESMI has submitted an application to the NYSDEC for a Research, Development & Demonstration (RD&D) permit<sup>1</sup>. Upon satisfaction of all application requirements, ESMI anticipates that an RD&D permit for this project would be issued by the state under authority granted by New York Codes, Rules and Regulations Title 6 § 360.18 (Solid Waste) and Title 6 § 201-1.16 (Air Resources). These regulations allow the NYSDEC to issue short-term research permits to test innovative technologies while simultaneously ensuring that the public health is protected.

ESMI intends to conduct a short-term test to treat up to a maximum of 5,000-tons of PFAS contaminated soil. It is anticipated that this testing will take less than two weeks of actual operation. There have been numerous studies showing the effectiveness of thermal desorption for the treatment of PFAS (see Appendix A), including United States Environmental Protection Agency (USEPA) and Department of Defense (DoD) lab and bench scale research. The State of Alaska has also permitted two companies to utilize thermal desorption units for the treatment of PFAS contaminated soil<sup>2</sup>.

During this test, ESMI will validate the USEPA's research at full-scale. This test will occur under an approved NYSDEC RD&D permit. Monitoring and validation testing will include laboratory analysis on the soil both pre- and post-treatment. In addition, air emissions testing will be conducted to evaluate process emissions. This short-term test as well as all emissions sampling and laboratory tests will be completed as approved by NYSDEC.

## 2.2. Process Description

ESMI uses a well-established and environmentally safe process called thermal desorption (see Figure 2 – Thermal Desorption Process Flow Diagram). A thermal desorber is not the same as an incinerator<sup>3</sup>.

Thermal desorption removes contaminants by heating them so that they un-stick (desorb) from soil, sludge or sediment. Once the soil enters the thermal desorption unit, the thermal desorption process occurs within a fully enclosed system. Thermal desorption can remove

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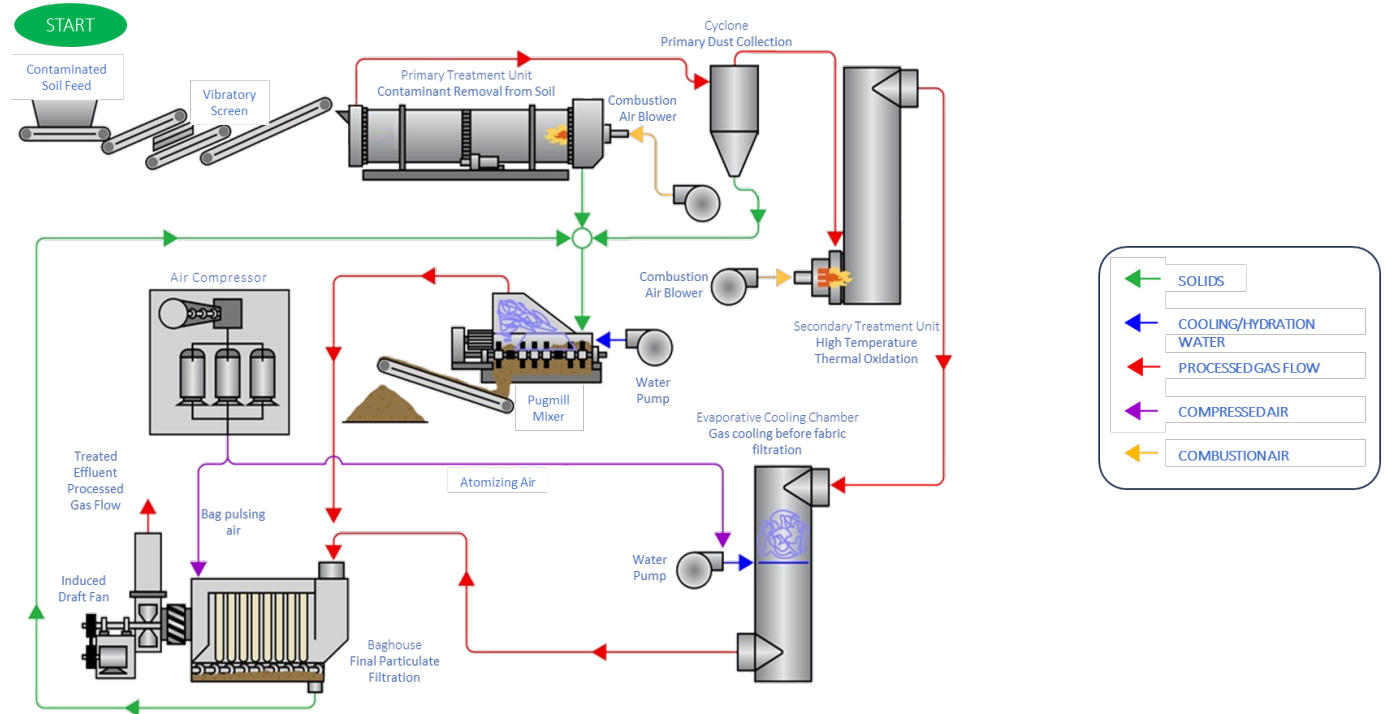
<sup>1</sup> By definition (6 NYCRR § 621.3(l)(2)(v) and 6 NYCRR § 360.18) RD&D permits are minor permits, short-term in duration, where the activity poses little to no risk to public health or the environment.

<sup>2</sup> Alaska DEC Website: <https://dec.alaska.gov/spar/csp/offsite-remediation/>

<sup>3</sup> USEPA, Community Guide to Thermal Desorption - <https://semspub.epa.gov/work/HQ/401623.pdf>

many organic contaminants, including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and PFAS compounds.

**FIGURE 2 – Thermal Desorption Process Flow Diagram**



Soil received at the facility to be processed by the thermal desorption unit originates from states within the Northeast U.S. Soils received by the facility are transported in covered trailers and roll-off containers meeting all NY State Department of Transportation (NYSDOT) and US Department of Transportation (USDOT) requirements.

The heating of soil is accomplished in a machine called a thermal desorption unit, which causes the contaminants found in the soil to evaporate. Evaporation changes the contaminants into vapors (gases) and separates them from the solid material.

The remediated soil is discharged from the process unit cleaned of contaminants. Desorbed/separated contaminants are conveyed via the heated airstream that exits the desorber into the thermal oxidization unit, a component in the air emission control system.

Once the soil is remediated through the thermal desorption unit it is devoid of moisture and must first be rehydrated using water. The soil is then stockpiled to allow post-treatment sampling and analysis. Treated soil analysis must meet the NYSDEC’s strict beneficial use criteria. Remediated soil meeting the beneficial use criteria is no longer a regulated waste and can now be reused in residential, commercial, and industrial applications.

The contaminants desorbed/separated from the soil move into a second unit called the thermal oxidizer (air emission control system). In this unit the contaminants are subjected to very high temperatures to be destroyed<sup>4</sup>, where the contaminants are oxidized and broken down into water, carbon dioxide and their elemental components. The thermal oxidizer, bag house, and other air emission control equipment are operated at the facility under performance criteria set forth in the facility's NYSDEC Air Resources Permit.

The Fort Edward facility does not discharge liquid water from its process. Water in the form of steam is emitted from the permitted air emission point.

### 2.3. Project Purpose and Importance

In general, PFAS compounds do not break down or degrade easily in the natural environment; these compounds are often referred to as persistent organic pollutants. Although PFAS chemicals are used in everyday products, at excessive levels these substances can also be toxic to both humans and the environment. There are some PFAS compounds, based on combined toxicity and persistence, which if not properly handled and managed, can represent a potential danger to public health and the environment. These human health risks are primarily associated with ingestion of PFAS. Additional information on potential health impacts can be found on the NYSDEC PFAS webpage<sup>5</sup>.

On April 8, 2024, the USEPA issued its *Interim Guidance on the Destruction and Disposal of PFAS (Ver 2)*<sup>6</sup>. The USEPA found thermal treatment to be among the technologies that have a lower potential for environmental release of PFAS compared to other technologies. Specifically, new research since 2020, including research conducted by the USEPA's Office of Research and Development, indicates thermal treatment units operating under certain conditions are more effective at destroying PFAS and minimizing releases or exposures. The updated USEPA guidance contains a technology evaluation framework to help analyze the effectiveness of destruction and disposal technologies. The guidance also encourages the development of additional information on the operation of these units at scale.

This project will utilize the USEPA's PFAS Destruction and Disposal Technology Evaluation Framework to gather additional data to assist NYSDEC with its important work, help prepare for compliance with upcoming federal regulations, and allow the NYSDEC to enhance its own state specific PFAS policies, guidance, and regulations. Furthermore, this research will help to ensure that PFAS contamination in New York State is cleaned up safely.

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<sup>4</sup> The temperatures used to control PFAS air emissions (i.e., destroy the PFAS) will range from 1500 to 1900 deg F

<sup>5</sup> <https://www.dec.ny.gov/chemical/108831.html>

<sup>6</sup> <https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf>



## 2.4. Potential Impacts

The ESMI facility in Fort Edward has operated as an employer, taxpayer, and a good steward to the environment and the local community since 1995. For the duration of the RD&D information collection process to prove the destruction of PFAS, the facility will look and operate as it has done for the past 29 years. The thermal desorption and thermal oxidation units are fully enclosed and operate at a negative pressure to prevent leaks. We anticipate that the actual research will take only about two weeks.

According to existing USEPA research, as well as the emissions modeling completed in accordance with USEPA and NYSDEC procedures, emissions associated with the testing will meet the state's identified air emission criteria, including DAR-1<sup>7</sup>. As described, soil contaminated with PFAS will be brought into the facility, PFAS will be separated from the soil via thermal desorption, and the remediated soil will be moved from ESMI to a permitted waste management facility. The separated PFAS will be destroyed via thermal oxidation.

- Land:
  - This RD&D project will use the existing Fort Edward facility. There will be no new construction or other land disturbance at the facility.
  - The clean remediated soil (with the PFAS removed) will be tested to confirm the absence of identifiable quantities of PFAS. Upon confirmation, the soil will be disposed of in a regulated waste management facility. Based on laboratory bench-scale testing completed by others (see Appendix A), we do not expect identifiable concentrations of PFAS in the soil.
  - Contaminated soil, prior to processing, will be stored in a building specifically designed to hold contaminated materials. The storage building's concrete floor has been placed over a 40 mil and 60 mil high density polyethylene (HDPE) liner to prevent the migration of hydrocarbons and other contaminants to subsurface soils and water.
  - Besides destroying the PFAS, this technology allows for material, like soil, to be beneficially reused. This approach conserves valuable landfill space, avoids the need to site new landfills in the future, and preserves natural soil and fill resources.
  - The thermal desorption process destroys PFAS, reducing the mass and minimizing potential risk. Whereas, landfilling of PFAS contaminated material does not eliminate or destroy PFAS and may allow "leachate to enter and contaminate groundwater"<sup>8</sup> potentially used for drinking.

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<sup>7</sup> NYSDEC, DAR-1 Guidelines for the Evaluation and Control of Ambient Air Contaminants Under 6 NYCRR Part 212 - [https://extapps.dec.ny.gov/docs/air\\_pdf/dar1.pdf](https://extapps.dec.ny.gov/docs/air_pdf/dar1.pdf)

<sup>8</sup> USEPA, Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Material Containing Perfluoroalkyl and Polyfluoroalkyl Substances – Version 2 (2024), April 8, 2024 - Section 3.b Landfills, Page 67 - <https://www.epa.gov/system/files/documents/2024-04/2024-interim-guidance-on-pfas-destruction-and-disposal.pdf>

- Air:
  - There will be no adverse impact on the local community.
  - The Fort Edward facility already possesses an air permit for its existing operations.
  - The RD&D permit application includes a description of the air emissions control equipment and a screening model of potential air emissions to assess the potential impacts in comparison to state and federal air standards. As delineated in the permit application, third-party air modeling presently indicates that total potential emissions for all PFAS compounds will be below the NYSDEC ambient air quality standard for PFOA. Modeling also indicates any potential hydrogen fluoride (HF) and tetrafluoromethane (CF<sub>4</sub>) will be below the NYSDEC ambient air quality standards (DAR-1).
- Plants and Animals:
  - This RD&D project will have no impact on plants or animals as there will be no new construction, no operations outside of the existing footprint of the facility, and no discernable air, water, or solids emissions.
- Energy:
  - This RD&D project will result in no additional use of energy. The facility will use its existing electrical and natural gas infrastructure to conduct the project. The research will help identify the most efficient operating temperatures that will control PFAS compounds while also being as efficient as possible with the facilities energy use.
- Noise, Odor, and Light:
  - This RD&D project will result in no additional noise, odor, or light from the Fort Edward facility.
  - Acceptance of the soil associated with this RD&D will not increase the annual number of trucks received at the facility or increase the number of hours the facility operates on average annually.
  - Trucks delivering material to the facility offload into an environmentally secure storage building. The storage building was designed to control particulate and odor emissions as well as to minimize noise resulting from the pre-processing of solid matrices prior to treatment. The control of particulate and odor emissions is accomplished using an induced draft fan paired with gas phase carbon bed absorber system.

## 2.5. Impact Mitigation Steps

The facility was originally designed to mitigate potential impacts such that the impacts are not significant or adverse. Current impact mitigation includes the following:

- Fully enclosed storage facility for odor and noise control, which also possesses a liner system below the concrete floor to prevent migration of contamination.
- Induced draft ventilation system with an activated carbon filter for odor control.

- Engineered air emissions control devices consisting of a cyclone separator, thermal oxidizer, evaporative cooling chamber, and a baghouse to maintain air emissions below regulatory thresholds.

Impact mitigation is also discussed in Section 2.4

### 3. Stakeholder Identification and Contact List

A contact list of stakeholders for the proposed action is provided in Appendix B. The contact list includes individuals and organizations with a direct stake in the proposed action and people and individuals and organizations that have expressed interest in the proposed project or similar projects affecting the same neighborhood or community.

The initial contact list was developed by identifying stakeholders from the following categories: local government and elected officials; business owners, residents, and occupants; local civic, community, environmental and religious organizations; local news media; administrator/operator of any school or day care that live, work and/or represent a neighborhood or community within a 1-mile radius of the project area (See Figure 1).

ESMI will utilize this contact list to communicate and disseminate information about the proposed project/action and permit application review process to the affected community and stakeholders. At a minimum, this includes distribution of the written information and outreach materials described in this plan to inform the community about upcoming public meetings and opportunities for public participation.

The contact list will be reviewed periodically and updated as appropriate throughout the application review process. ESMI will update the contact list with any new stakeholders identified during the public meeting or execution of other PPP components. In addition, individuals and organizations will be added to the contact list upon request. Such requests should be submitted to the project liaison identified in Section 4. Other additions to the contact list may be made at the discretion of ESMI or in consultation with NYSDEC staff, as appropriate.

### 4. Project Liaison

A representative from the project team will be available during business hours at:

Robert Martin  
(877) 685-8312  
[rmartin@cleanearthinc.com](mailto:rmartin@cleanearthinc.com)

Local residents and interested stakeholders can contact the project liaison listed above to provide input to the project team, discuss related issues or concerns and/or to ask questions or request information. The project liaison shall respond in a timely manner and in the manner appropriate to questions or information requests received. The project liaison will be

responsible for tracking and documenting public input, inquiries, questions, and information requests received, along with responses provided.

## 5. Public Outreach Activities

ESMI will utilize a range of engagement strategies and conduct various public outreach activities to facilitate participation, involvement, and direct communication with the community during the permit application review process. ESMI will implement the public outreach activities outlined below upon finalization and NYSDEC approval of this PPP.

In compliance with the requirements of CP-29, ESMI will hold one public information meeting to inform the public about the proposed action and the RD&D permit application review process. ESMI will prepare, distribute, and post written information and materials, including a meeting notice and fact sheet, to encourage dialogue and solicit input from interested stakeholders during the RD&D permit application review process. ESMI will maintain a webpage ([https://pages.cleanearthinc.com/new-york-ppp](https://pages.cleaneearthinc.com/new-york-ppp)) to supplement the requirements. All public outreach materials and information will be prepared and presented in an easy-to-read, understandable format, using plain language free of legal terminology, and geared towards a non-technical audience.

The fact sheet and public meeting notice (see Appendix C and D respectively) will be made available and disseminated in English. In addition, the public can contact the project liaison regarding the availability of language assistance and to request that the notice and fact sheet are translated into another language for comprehension by non-English speaking or limited proficiency stakeholders.

### 5.1 Public Meeting

One public meeting will be conducted to satisfy the intent of CP-29. A meeting is typically required near the end of the permit application review process to inform the public about: the status of, or, if applicable, the availability of, final application materials and draft permits for review; the pending NYSDEC public comment period, and deadline to submit written comments to NYSDEC, if established; and eventual final decision.

ESMI will facilitate the meeting. The meeting will consist of ESMI and/or its representatives presenting a brief overview of the project, including any relevant background information, details on the RD&D permitting action, scope of work, and schedule. This meeting will include a question-and-answer portion where the floor will be open for attendees to ask questions and make remarks.

Once the PPP has been approved by NYSDEC, the fact sheet (see Appendix C) will be posted and available in the online document repository described in Section 5.2 of this document. No later than two weeks prior to the public meeting, ESMI will distribute the fact sheet to provide stakeholders with relevant background on the proposed project/action and facilitate

meaningful participation during the meeting. The fact sheet will be distributed together with the public meeting notice via email and/or mail.

The meeting notice and fact sheet will be posted at the following locations:

- Hudson Falls Free Library

The fact sheet will also be posted within the vicinity of the project site and visible to the public. For example, information may be posted on bulletin boards located in public facilities such as libraries, schools, or community centers within the project site.

## 5.2 Online Document Repository

An online document repository will be established for the community and interested stakeholders to access and review information about the project. The online repository available at <https://pages.cleanearthinc.com/new-york-ppp> will provide information and documents relating to the project and RD&D permit application.

The repository will be updated throughout the permitting process with project-related information and written materials, including:

- Application forms and supporting materials
- Draft permit
- Fact sheet
- Notice of Complete Application (NOCA) provided by the NYSDEC
- Project Updates: Will cover progress to-date in implementing the plan; all substantive concerns raised to-date; all resolved and outstanding issues; the components of the plan yet to be implemented; and an expected timeline for completion of the plan

## 5.3 Distribution of Notice of Complete Application

Once NYSDEC determines the RD&D permit application for the proposed action/project is complete and provides the Notice of Complete Application (NOCA) to the applicant, ESMI, in accordance with this plan will post the NOCA and draft permit to the online document repository and/or notify meeting attendees via email.

## 6. Final Summary Report and Written Certification

Upon completion of the public participation plan, ESMI will submit written documentation to the NYSDEC to certify that it has fully executed and complied with the approved PPP. The certification shall be signed by the ESMI or its designated agent and submitted to NYSDEC prior to a final decision on the permit application. The report will summarize the activities that occurred in accordance with the PPP and will identify any substantive concerns raised by stakeholders during the public meeting, or, at any time throughout the permitting process and detail ESMI's response(s) to any such concerns or questions. ESMI will include, or append, any

documentation that supports the final summary report, such as: the meeting sign-in sheet(s), record of attendees/participants, meeting presentation, notes or minutes, summary of questions and answers, and copy of newspaper notice or other proof of publication. In addition, the report will identify any changes or modifications to the proposed project that were made or considered by ESMI to address or reduce concerns surrounding the permit application. The final summary report and written certification will become part of the application record and will be posted to the online document repository so that it is readily available to the public.

Appendix A  
Research Publications

- Frank Barranco, Paul Caprio, and George Hay, "Final Report - Evaluation of Indirect Desorption Coupled with Thermal Oxidation Technology to Treat PFAS-Impacted Investigation-Derived Waste, SERDP Project ER18-1572", February 2020. (Documents PFAS removal from soil processed through a thermal desorber and subsequent destruction with a thermal oxidizer.) - [LINK](#)
- Nathan H. Weber, Sebastian P. Stockenhuber, Ammar Abu Fara, Charles C. Grimison, John A. Lucas, John C. Mackie, Michael Stockenhuber and Eric M. Kennedy, "Experimental Thermal Decomposition of PFOS and PFOA", proceedings of the IT3 Conference, January 27-28, 2021. (Study evaluated the products formed at temperatures of 1,706 and 1,994°F and under various types of atmospheres - argon, nitrogen, air, water. When air plus water vapor were used as the carrier gas, no lighter fluorinated compounds were identified in the off gas at 1,706°F. PFOS data was also presented at 1,994°F with similar trends evident.) - [LINK](#)
- Benjamin Hanley, John Lucas, and Annette Nolan, "Remediation of PFAS-impacted Soil Using Innovative Treatment Technologies", presentation at Ecoforum Conference and Exhibition, 2016 (Study of removal of PFOS and PFOA from soil using thermal desorption)
- J. Ryan, B Gullett, Analysis of Fate of PFAS During Incineration PFAS Emissions Measurement Methods Development and Emissions Characterization Study at National Response Corporation Alaska, LLC AFFF Contaminated Soil Thermal Treatment Facility SERDP Project ER19-1408, Nov. 2020. - [LINK](#)
- E. Shields, et al, "Pilot Scale Thermal Destruction of PFAS in a Legacy AFFF", May 2023. (Study measured PIC in the off gas from direct destruction of AFFF liquid at different residence times and temperatures in a pilot scale furnace.)
- A. Rance, "A Thermal Desorption Solution for Per- and Polyfluoroalkyl Substances (PFAS) in Soils", July 15, 2019 (Study showing that thermal desorption successfully eliminated greater than 99% of the PFOS and PFOA from in the remediated soil.)
- USEPA, Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Material Containing Perfluoroalkyl and Polyfluoroalkyl Substances – Version 2 (2024), April 8, 2024 - [LINK](#)

**Appendix B**  
**Stakeholder List**

Postal Customer	Name, Title	Address 1	Address 2	Address 3	Street Address	City	State	Zip	Site Name (County)
<b>Contact List</b>									
<p><b>Instructions:</b></p> <p>1. Enter NYSDEC Application # and Facility Name (if known) in cells A5 and A6 and the date of the list in D6.</p> <p>2. Each contact list <b>must</b> include the following categories: local government and elected officials; adjacent business owners, residents, occupants and/or property owners; local civic, community, environmental and religious organizations; local news media; administrator/operator of any school or day care that live, work and/or represent a neighborhood or community within the outreach area specified in the PPP ; and any other parties who have requested to be placed on the site contact list.</p> <p>3. Residents and businesses adjacent to the site should be identified in Column A as "<b>Postal Customer</b>". <b>Leave Column B blank.</b> For all other categories of individuals and organizations, identify the name and title (if known) in Column B and leave Column A blank. "Titles" are typically for elected officials (e.g., "Senator," "Assemblyperson," "Mayor," "Supervisor").</p> <p>4. Row 7 does not contain actual column headings. They are in Row 1, so <b>PLEASE DO NOT CHANGE OR DELETE ROW 1.</b> It is necessary for merging to labels and envelopes.</p> <p>5. Please put P.O. Box numbers in the "Address 3" column, where possible.</p>									
NYSDEC Application #: 5-5330-00038/00027									
Facility Name: Environmental Soil Management of New York LLC dba ESMI A Clean Earth Company			List Last Updated:						
Postal Customer	Name, Title	Address 1	Address 2	Address 3	Street Address	City	State	Zip	Site Name (County)
<b>Local Government and Elected Officials</b>									
	Congresswoman Elise Stefanik	NA	NA	NA	99 Troy Rd.,Ste. 312	East Greenbush	NY	12061	Rensselaer
	Senator Jacob Ashby	NA	NA	NA	594 Columbia Turnpike	East Greenbush	NY	12061	Rensselaer
	Assemblymember Carrie Woerner	NA	NA	NA	112 Spring St., Ste. 205	Saratoga Springs	NY	12866	Saratoga
	Senator Dan Stec	NA	NA	NA	5 Warren St.	Glens Falls	NY	12801	Warren
	Assemblymember Matthew Simpson	NA	NA	NA	4 Southwestern Ave., Ste 3	Queensbury	NY	12804	Warren
	Robert Henke-Chair Washington County Board of Supervisors	NA	NA	NA	383 Broadway, County Municipal Center, Building B.	Fort Edward	NY	12828	Washington



	Samuel Hall- Vice-Chair Washington County Board of Supervisors	NA	NA	NA	383 Broadway, County Municipal Center, Building B.	Fort Edward	NY	12828	Washington
	Timothy Fisher- Town of Fort Edward Supervisor	NA	NA	NA	20 King St. PO Box 146	Fort Edward	NY	12828	Washington
	Matthew Traver- Village of Fort Edward Mayor	NA	NA	NA	118 Broadway	Fort Edward	NY	12828	Washington
	Peter Williams- Village of Fort Edward Deputy Mayor	NA	NA	NA	118 Broadway	Fort Edward	NY	12828	Washington
	City of Glens Falls Mayor	NA	NA	NA	42 Ridge Street	Glens Falls	NY	12801	Saratoga
	Village of Hudson Falls Mayor	NA	NA	NA	220 Main St	Hudson Falls	NY	12839	Washington
<b>Adjacent Business Owners, Residents, Occupants, and/or Property Owners</b>									
	Trius, Inc	NA	NA	NA	268 Towpath Ln	Fort Edward	NY	12828	Washington
	Real Bark Mulch LLC	NA	NA	NA	304 Towpath Ln	Fort Edward	NY	12828	Washington
	Terry Karanikas	NA	NA	NA	384 Towpath Ln	Fort Edward	NY	12828	Washington
	Delaware & Hudson Railway Corp	NA	NA	NA	16 Factory St	Fort Edward	NY	12828	Washington
<b>Local Civic, Community, Environmental, and Religious Organizations</b>									
	Rogers Island Heritage Development Alliance	NA	NA	NA	PO Box 208	Fort Edward	NY	12828	Washington
	Fort Edward Historic Association	NA	NA	NA	29 Broadway	Fort Edward	NY	12828	Washington
	Fort Edward Chamber of Commerce	NA	NA	NA	11 Rogers Island	Fort Edward	NY	12828	Washington
	Fort Edward Library	NA	NA	NA	23 East St.	Fort Edward	NY	12828	Washington
	Fort Edward Senior Center	NA	NA	NA	78 Oak St.	Hudson Falls	NY	12839	Washington
	Village Baptist Church	NA	NA	NA	131 Broadway	Fort Edward	NY	12828	Washington
	Clean Air Action Network of Greater Glens Falls	<a href="mailto:contact@cleanairactionnetwork.org">contact@cleanairactionnetwork.org</a> ; cc: <a href="mailto:tracy.frisch@gmail.com">tracy.frisch@gmail.com</a>	NA	NA	NA	NA	NA	NA	NA
	Crandall Public Library	NA	NA	NA	251 Glen St	Glens Falls	NY	12801	Saratoga

	Fort Edward Public Library	NA	NA	NA	23 East St	Fort Edward	NY	12828	Washington
	Washington County Co-Op Extension	NA	NA	NA	415 Lower Main St, Ste 2	Hudson Falls	NY	12839	Washington
	Fort Edward Village Recreation	NA	NA	NA	39 McIntyre St	Fort Edward	NY	12828	Washington
	St Joseph's Church	NA	NA	NA	164 Broadway	Fort Edward	NY	12828	Washington
	For Edward American Legion	NA	NA	NA	44 McCrea St	Fort Edward	NY	12828	Washington
	Rogers Island Visitor Center	NA	NA	NA	11 Rogers Island Dr	Fort Edward	NY	12828	Washington
	Hudson Falls Free Library	NA	NA	NA	220 Main St	Hudson Falls	NY	12839	Washington
	LEAP Head Start Rivert Street	NA	NA	NA	11 Saint Pauls Dr	Hudson Falls	NY	12839	Washington
	Gospel Lighthouse Assembly of God Church	NA	NA	NA	30 LaCross St	Hudson Falls	NY	12839	Washington
	World Awareness Children's Museum	NA	NA	NA	89 Warren St	Glens Falls	NY	12801	Saratoga
	First Baptist Church	NA	NA	NA	100 Maple St	Glens Falls	NY	12901	Saratoga
	Hudson River Watershed Alliance	NA	NA	NA	PO Box 1734	Kingston	NY	12402	Ulster
	Warren County Head Start	NA	NA	NA	11 Pearl St	Glens Falls	NY	12801	Saratoga
	Riverkeeper	<a href="mailto:info@riverkeeper.org">info@riverkeeper.org</a>	NA	NA	20 Secor Rd	Ossining	NY	10562	Westchester
	Rensselaer Environmental Coalition	<a href="mailto:info@rensselaerenvironmentalcoalition.org">info@rensselaerenvironmentalcoalition.org</a>	NA	NA	PO Box 228	Rensselaer	NY	12144	Rensselaer

**Local News Media**

	Post Star	<a href="mailto:jdecamilla@poststar.com">jdecamilla@poststar.com</a>	NA	NA	76 Lawrence St	Glens Falls	NY	12801	Saratoga
	Glens Falls Chronicle	<a href="mailto:Chronicle@loneoak.com">Chronicle@loneoak.com</a>	NA	NA	15 Ridge St.	Glens Falls	NY	12801	Saratoga
	Times Union	<a href="mailto:cseiler@timesunion.com">cseiler@timesunion.com</a>	NA	NA	645 Albany Shaker Road	Albany	NY	12211	Albany
	WNYT	<a href="mailto:mr Raffaele@wnyt.com">mr Raffaele@wnyt.com</a>	NA	NA	715 N. Pearl St.	Albany	NY	12204	Albany
	WTEN	<a href="mailto:jpetrequin@news10.com">jpetrequin@news10.com</a>	NA	NA	341 Northern Boulevard	Albany	NY	12204	Albany
	Spectrum	<a href="mailto:albanynews@charter.com">albanynews@charter.com</a>	NA	NA	104 Watervliet Avenue Ext.	Albany	NY	12206	Albany
	Foothills Business Daily	<a href="mailto:Steve@foothillsbusinessdaily.com">Steve@foothillsbusinessdaily.com</a>	NA	NA	NA	NA	NA	NA	NA

**Administrator/Operator of Any School or Daycare that Live, Work, and/or Represent a Neighborhood or Community within the Outreach Area**

	Fort Edward Union Free School District	<a href="mailto:rdemallie@fortedward.org">rdemallie@fortedward.org</a>	NA	NA	220 Broadway	Fort Edward	NY	12828	Washington
	World Class Kids Daycare	NA	NA	NA	12 Farr Lane	Queensbury	NY	12804	Warren

	Happy Campers Daycare	NA	NA	NA	3 Williams St	Fort Edward	NY	12828	Washington
	Margaret Murphy Kindergarten	NA	NA	NA	2 Clark St	Hudson Falls	NY	12839	Washington
	Hudson Falls Intermediate School	NA	NA	NA	139 Maple St	Hudson Falls	NY	12839	Washington

APPENDIX C  
FACT SHEET

## FACT SHEET

### Environmental Soil Management of New York, LLC

- **Project:** Research, Development & Demonstration (RD&D) Permit
- **Applicant:** Environmental Soil Management (ESMI) of New York, LLC
- **Facility:** Fort Edward Township, NY
- **NYSDEC Application Number:** 5-5330-00038/00027
- **A Public Participation Plan (PPP) has been developed in accordance with NYSDEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29)**

#### What is the Proposed Project?

- ESMI has submitted an application to the NYSDEC for a Research, Development & Demonstration (RD&D) permit.
- ESMI intends to conduct a short-term test to thermally treat up to a maximum of 5,000tons of PFAS-contaminated soil. It is anticipated that this testing will take less than two weeks.
- During this test, ESMI will validate EPA and DoD research at full-scale.
- This test will occur under an approved NYSDEC RD&D permit. Monitoring and validation testing will include laboratory analysis on the soil both pre- and post-treatment. In addition, air emissions testing will be conducted to evaluate process emissions.
- This short-term test as well as all emissions sampling and laboratory tests will be completed as approved by NYSDEC.

#### What is the Project's Purpose and Importance?

- On April 8, 2024, the USEPA issued its *Interim Guidance on the Destruction and Disposal of PFAS (Ver 2)*. This guidance encourages the development of additional information confirming the effectiveness of thermal destruction technology at full scale.
- The purpose of this project is to gather that additional data as requested by the USEPA.
- The project will also assist NYSDEC with its important PFAS work, help prepare for compliance with upcoming federal regulations, and allow the NYSDEC to enhance its own state specific PFAS policies, guidance, and regulations.
- This research will help to ensure that PFAS contamination in New York State is cleaned up safely.

### **How might the project affect the surrounding community?**

- There will be no adverse impact on the local community.
- There will be no new construction or other land disturbance at the facility.
- There will not be any new operations outside of the existing footprint of the facility.
- There will be no discernable air, water (beyond water vapor), or solids emissions.
- Air modeling presently indicates that total potential emissions for all PFAS compounds will be below the NYSDEC ambient air quality standard for PFOA.
- Air modeling also indicates that any potential hydrogen fluoride (HF) and tetrafluoromethane (CF<sub>4</sub>) will be below the NYSDEC ambient air quality standards.
- There will be no additional noise, odor, or light from the ESMI facility.

### **How can I participate in the permit review process?**

- ESMI will be holding a virtual public meeting on Wednesday, December 4, 2024, at 7:00 pm.
- Interested parties may attend this meeting to learn more about the project and ask questions.
- Interested parties may also provide input by submitting comments in writing, by phone, or email to the project contact person identified below.

### **Where can I get more information about the proposed project?**

- To learn more about the project, obtain instructions on how to attend the upcoming virtual public meeting, find out about the status of the permit application and public comment period, and submit comments you may:
  - Visit our online document repository at: <https://pages.cleanearthinc.com/new-york-ppp>
  - Project Contact - Robert Martin
    - by phone: (877) 685-8312
    - by email: [rmartin@cleanearthinc.com](mailto:rmartin@cleanearthinc.com)
    - in writing: Attn: Public Participation Plan, 304 Towpath Lane, Fort Edward, NY 12828

### **Who at the state is responsible for reviewing the RD&D Permit Application?**

- NYSDEC Region 5 Warrensburg Sub-Office, 232 Golf Course Road, Warrensburg, NY 12885, is responsible for reviewing and issuing the required permits.
  - Contact - Beth Magee
    - by phone: (518) 623-1283
    - by email: [beth.magee@dec.ny.gov](mailto:beth.magee@dec.ny.gov)

# PUBLIC NOTICE



## COMMUNITY MEETING

ESMI of New York

RD&D Permit Application # 5-5330-00038/00027

### Virtual Public Information Meeting

December 4, 2024

7:00 – 8:00PM EST

**Video Webcast Link:** <https://ccmediaframe.com?id=KCOMhURu>

**Telephone Call-In: 1-866-652-5200**

Hosted by: **ESMI of New York**

The meeting will:

- Inform the community on the project details
- Describe the project timelines and important milestones
- Provide opportunities for the community to ask questions

### / NYS DEC CONTACT

Beth Magee

(518) 623-1283

[beth.magee@dec.ny.gov](mailto:beth.magee@dec.ny.gov)

### / ENVIRI CONTACT

Robert Martin

(877) 685-8312

[rmartin@cleaneearthinc.com](mailto:rmartin@cleaneearthinc.com)

Additional information may be found on the internet:

<https://pages.cleaneearthinc.com/new-york-ppp>