

UPSTREAM WATCH

October 10, 2019

Dear Mr. Marshall:

Attached are the slides presented at last night's Planning Board meeting.

Thank you (and the Board) in advance for considering my availability when rescheduling the remainder of the air emissions section. I am available October 30th or November 6th.

We do have one question with respect to "air". The agenda formally listed "air emissions", but the focus of last night's presentation was strictly on air quality. In "air emissions" submission, there is also an SOP for minimizing fugitive dust, but the proponent did not mention that topic. Will that be a future topic for the proponent to first present to the Board before we comment on it?

Please allow me to reiterate one point from the presentations and discussion last night. Although my slides and discussion recommended many permit conditions, it is not the intent to suggest that the Planning Board be put in any position to make design decisions. The equipment and operating assumptions made in the information submitted in the proponent's studies, to demonstrate compliance, were developed solely by the proponent and provided to the Planning Board. The Planning Board should then include those as Special Permit conditions (i.e. special limits to this unique project). The design limits and assumptions are, and should be, entirely up to the proponent. Any assumptions they include to demonstrate permitting compliance should only be included in their analyses if they plan to meet them, so it is reasonable to simply include them as a permit condition to (1) establish expectations for the proponent and the City, (2) protect the public, and (3) justify and protect the Planning Board's final decision.

Again, I apologize for not providing the slides in advance, but I simply did not have sufficient time to prepare and submit these in advance. As I mentioned at the meeting last night, as of last Friday, October 4, 2019, the agenda with these topics were not posted on the cityofbelfast.org website. I thought based upon the First Procedural Order that the website was the go to source for the meetings and agendas. It is good to learn at the meeting that I can also check the Republican Journal for these agenda dates and topics going forward.

I will definitely provide the air quality slides ahead of time, within 7 days of posting on the website/Journal, but I may need to adjust them based upon the new information provided during the proponent's presentation last night. Last night the air emissions presentation and discussion focused on a limit of "10% of design" capacity. I rechecked their air quality report and there is no mention of "10% of design" as the "self-selected" permit limit, I think they called it last night, to allow for some peak shaving. The report discusses a maximum fuel assumption of 900,000 gallons, which corresponds to about 10.52% of design. If the limit is now "10% of design", that would correspond to a little less than 860,000 gallons per year. Please let me know whether the design basis is as presented last night, or as originally discussed in their consultant's report, and I will adjust my slides accordingly prior to the posting submission deadline.

Sorry for the multiple questions. I know this is a very long process, so I thank you for your time.

Sincerely,



Michael Lannan, P.E.

On behalf of Upstream Watch