Speaker 1 (00:00:00):

Welcome to the Clean Earth Public Participation Meeting. All participants will be in listen only mode during the presentation based on your early feedback. We have extended this evening's event to two hours. After today's presentation, there will be an opportunity for you to dial in by phone and submit your questions and comments. Please note that if you're viewing this meeting through the online webcast, you must still dial in to make a comment. Again, if you want to speak, to ask a question or offer a comment, you must dial in and the toll free number to dial is 1-866-652-FIVE 2 0 0. Again, that number is 1-866-652-FIVE 2 0 0. Once you dial that number, please press star one on your touchstone phone to put yourself in the queue to ask a question for your convenience. The number will be on the screen when it is time for questions, comments and questions will be limited to two minutes per person.

(00:01:04):

Each person will have only one opportunity to speak during the hearing. If you do make a comment or ask a question using the phone number, please remember to mute your webcast. Additionally, you may submit online questions anytime using the window on the webcast. If we have enough time this evening, we will attempt to address these written questions. Regardless, all verbal and written questions will be summarized, compiled and addressed in writing by December 23rd and made available at https slash pages clean earth inc.com/ New York ppp. The website link is also listed below the online question submittal box. Please note this event is being recorded. I would now like to turn the conference over to David Dunlap, vice President of Envi Corporation. Please go ahead David.

Speaker 2 (00:02:07):

Thank you Amy. Good evening. As noted, my name is David Dunlap. I'm the Vice President Vire, the parent company for Clean Earth. Thank you all for attending this evening's public hearing. So the public hearing has been prepared to fulfill and comply with the requirements of the New York State Department Environmental Conservations Commissioner policy number 29. Tonight we will provide the Fort Edward community with an opportunity to learn more about Clean Earth, the Fort Advert facility and the proposed project. So without delay, I'd like to move onto the agenda for the evening. So give me just a second. I'm going

Speaker 3 (00:02:48):

To share my screen, give everybody couple seconds, make sure everything shows up. So here's the agenda for

Speaker 2 (00:03:06):

This evening. I'm sorry to nearly advance my slide there. Here's the agenda for this evening. We're going to do an introduction on Clean Earth and the Fort Edward facility. We're going to review the proposed project and the permit application process and give everybody an opportunity to make comments. Please note that the URL at the bottom of almost every page, as I'll probably note numerous times tonight, if you go to this URL, you can find detailed information on the project in the permit application, ways to submit written comments, and even a copy of the presentation

Speaker 3 (00:03:45):

That I'm using right now. So the facility in Fort Edward is owned and

Speaker 2 (00:03:57):

Operated by Clean Earth, but you may also see the names Environmental Soil Management of New York or it's abbreviation ESMI. The names are often used interchangeably, but ESMI and Clean Earth are the same entity. It's also important to note that the facilities permits are all listed under the name ESMI. Who is Clean Earth? Clean Earth is a division of Envi Corporation. Envi is an environmental services company based in Philadelphia, Pennsylvania. Our services help companies safely manage their waste, achieve sustainability goals, reduce carbon footprint, and generally engage in the circular economy. Our goal is to reuse and recycle a hundred percent of the materials we handle for our customers. And in 2023, over 90% of those materials were reused or recycled as reflected in our ESG report that we issued earlier this year. And what that really means is that all of those materials that were reused and recycled did not end up at an incinerator

Speaker 3 (00:05:05):

Or in a landfill. We're very proud of that. So lemme talk briefly about the Forwood facility.

Speaker 2 (00:05:18):

We've been on Towpath Lane since 1995 and during all those years we have been safely and compliantly cleaning and contaminated soil to meet state cleanup standards. The facility uses a process called thermal desorption. Simply put that the soil is tumbled in the cylinder, heat is applied and the contaminants are absorbed or evaporated from the soil. The remediated soil cleaned of the contaminants is discharged from the cylinder and after testing is reused per state regulations, the contaminants removed from the soil passed to second unit, which we call a thermal oxidizer, and that unit destroys the contaminants and controls air emissions. For more info on the process, please refer to the public participation plan that is found on the website. As I noted before, on the bottom of this page, you'll see the URL but also in the bottom of your chat window. You should also have a link. Some important facts about the Fort Edward facility I think that are very relevant to today's conversation is the facility does not manufacture or use PFAS. The facility does not currently process soil identified as containing PFAS. The facility is not an incinerator. And a question that I often get when I talk to people about our facilities is that any missions that you might see from the facility are water vapor. This visible water vapor comes and goes and is almost entirely dependent on the outside temperature

Speaker 3 (00:07:05):

And relative humidity. Let's now talk about the proposed project.

Speaker 2 (00:07:20):

The permit application that we have submitted to DEC is for short term project that will take about two weeks of operating time. We intend to treat up to a maximum of 5,000 tons of soil lightly contaminated with PFAS. The project will occur under the strict guidelines laid out in a final permit issued by the state. The permits many conditions will include testing of the soil, both pre and post-treatment and testing of the air to evaluate potential emissions. All sampling and testing will be conducted as documented in the permit application and is approved by the state. When the project is completed, clean

Speaker 3 (00:08:02):

Earth will submit a detailed report to the state. So I think

Speaker 2 (00:08:12):

It's important to take a moment to discuss the project purpose and value or put another way. Why do this research? Why ask the DEC for a RD and D permit? Most directly EPA and the state of New York want us to validate what others have already shown to be true. Regulators want as much certainty as possible. So we have offered to prove that cece's technology can be just as safe and as effective as others have shown in both the lab and at full scale. But the greater value may be in what it means for those who must deal with pfas contaminated drinking water and other contaminated issues. In the state of New York, P FFA s contaminated soil can cause P FFA S contaminated drinking water. This PFAS contaminated soil or what I like to call PFAS hotspots Leach PFAS in use stream when it rains and some of that PFAS ends up in your drinking water without action. These hotspots will leak out PFAS for many decades to come. So having options to clean up soil directly

Speaker 3 (00:09:29):

Address P FFA S contaminated drinking water.

Speaker 2 (00:09:33):

Now currently there are a few basic options We have to address those PFAS soil hotspots. You can do nothing and just leave it, which I don't think is an option for most of us. You can dig it up and put it in a landfill. Of course that does not eliminate the PFAS or destroy it, but rather defer the problem to future generations or you can dig it up, clean up the soil and destroy the PAS. That is how CE thermal Clean Earth's thermal desorption technology can help New York communities fix their PFAS properly. In addition. And finally, but not the least, conducting this short-term project will be a direct help to the state of New York because it is going to need to comply with federal regulations that we know of currently and wants to come in the future, but also develop its own state specific policies and regulations and ultimately ensure that the PFAS contamination

Speaker 3 (00:10:34):

Found in the state is safe and cleaned up. So how might the project affect the surrounding community?

Speaker 2 (00:10:49):

I'm sure you're also worried about how this project, this is probably one of the issues that you're most worried about. A major part of the permit application process is evaluating this crest. You can find this detail in the permit application is posted on the website, but briefly as required by the state, we have conducted extensive air modeling that shows no adverse air impacts. This modeling includes the fact that no total PFAS emissions, if any, will be, excuse me, lemme say that again. Total PAS emissions if any, will be below the state's P OA emission standards. We've also modeled other potential pollutants such as hydrogen fluoride and carbon tetra fluoride. All of our modeling has also showed that any potential emissions of these contaminants will be below state safety standards. There'll be no new construction for this project, so no disturbance associated with this project. There'll be no additional dust emissions, no additional noise, odor or light from the facility associated with the project. No additional truck traffic and no water discharges. In fact, the facility has no water discharges

Speaker 3 (00:12:07):

Regardless of the project. Alright, so where are we in the permit application

Speaker 2 (00:12:18):

Process? In fact, we're quite early in the process and here this is sort of a simplification of the state process. We've completed an initial permit application to the state and DEC has reviewed it, asked for additional information which we have supplied. Currently we are in the first public participation stage. As part of the application we are required to develop a public participation plan, which can be found on the website. This public hearing fulfills a major part of that plan going forward. What happens next? DEC will evaluate our permit application including the comments received at this hearing and any that you might submit in writing. DEC will determine if the permit application is complete. If yes, then the DEC will create a draft permit and put it out for public comment. We will also post it on our website. DEC will evaluate all comments received and then decide whether or not to actually issue the RDAD permit. So that's summary of the project. As noted before, you can access all the details at the website. We are now ready to move to the public comment period for that portion of the hearing. I will be joined by Rob Martin, excuse me. Rob Martin, who is Cleaner's technical director. Rob is based right there in Fort Edward. And so with that I'll turn it back over to the moderator.

Speaker 1 (00:14:00):

Thank you David. We'll now open the floor to comments or questions. Participants can submit their comment or question by calling the toll free number on the screen, 1-866-652-FIVE 2 0 0 1 dialed. Please press one to join the queue to ask a question or to speak. You'll be asked for your name and location. If you change your mind and decide not to ask a question or to give a comment, you can remove yourself from the queue by pressing star. Two questions can also be submitted via the online webcast chat time admitting we will attempt to answer some of those questions at the end of the public comment. At this time we'll pause momentarily to assemble our roster. Once again, participants can submit their question by calling the toll free number on the screen, 1 8 6 6 6 5 2 5200. Once you dial that number, please press star one on your touch tone phone to put yourself in the queue to ask a question. And the first comment comes from Paul Itso at Fort Edward New York. Please remember to mute your webcast.

Speaker 3 (00:15:15):

Hello? Can you hear me? Hello? Yes, yes. I'm sorry. I was muted.

Speaker 4 (00:15:23):

Hi. I was wondering, does this project require approval by, are you in the

Speaker 3 (00:15:29):

Village or town of Fort Edward?

Speaker 5 (00:15:35):

Is Rob Martin speaking? We're located within the village.

Speaker 3 (00:15:40):

Does the village have, do they have to approve this project? The village, from a permitting standpoint

Speaker 5 (00:15:52):

Does not need to approve the project.

Speaker 4 (00:15:56):

Oh, so it's strictly the state I guess or DEC, something like that?

Speaker 5 (00:16:03):

Correct. The permit has been submitted directly to New York State DEC.

Speaker 4 (00:16:08):

Okay. Well I live over in the town of Monroe actually, but my mailing address is Fort Edward and we just had a big issue where we live with a firm that was treating solid waste. They were using a process called paralysis and they claimed, just like you claim 99.9% of P-F-A-S-P-F-O-S, you name it will be destroyed. Our local residents did their homework and it was completely false. In fact, the EPA doesn't even claim that. Could you cite the peer-reviewed study that support your claim of 99.9% destruction of PFAS or any related compounds?

Speaker 1 (00:16:59):

30 seconds please wrap up your comments.

Speaker 4 (00:17:03):

That's my comment.

Speaker 2 (00:17:06):

Thank you for that. And to answer your final question, this is David again. The citations that you asked for are in on the website in the public participation plan, but also in the permit application. If you would like us to find and send you those citations, if you put your contact information in the chat, we'd be happy to send you that directly. Alright, thank you.

Speaker 1 (00:17:35):

The next question comes Gilis at Fort Ed Edward New York.

Speaker 6 (00:17:40):

Hi. Wow, I didn't expect that early on a response. I guess the, can you hear me?

Speaker 2 (00:17:50):

Yes, Teresa,

Speaker 6 (00:17:51):

Please

Speaker 2 (00:17:51):

Go ahead.

Speaker 6 (00:17:52):

Okay,

Speaker 2 (00:17:52):

Yes,

Speaker 6 (00:17:53):

So if you're saying to Mike Inso that he can put that in the chat, I'm on my cell phone to participate in this meeting and I'm not sure how I would do that. I'm talking Shannon to them now. Okay, so let me express my concern.

Speaker 7 (00:18:26):

So,

Speaker 6 (00:18:32):

Oh, I'm up and live. Hang on. I got to find my right

Speaker 3 (00:18:35):

Paperwork.

Speaker 8 (00:18:41):

You have only a minute left. Please proceed. I

Speaker 6 (00:18:43):

Know, I'm so sorry, but this is a very difficult approach to a meeting and we are all trying very hard to make this happen. Okay. So I would I guess express at this point that we would like to have or demand continuous monitoring on the stacks during this trial period with results open to the public. I do not feel this public meeting postcard was effective in fulfilling the mandate from New York State DEC to encourage public participation. That's what's bad about this approach. Most people I've spoken with were angry and threw it out because there was no information on it. They were unable to access the website, which is the problem that I'm having right now and they just could not click the clicks. We need an in-person meeting. Rob Martin offered to meet with me at my kitchen table. That's not appropriate. We need an in-person meeting. This is not working. Thank you. Is my time up now? Your time is up. Thank you ma'am.

Speaker 3 (00:20:08):

Theresa, thank you for those comments. Moderator, we can move forward.

Speaker 1 (00:20:27):

Brandon Sullivan from Hutson Falls New York. You are next. Please go ahead. Hi. My question was how long does it

Speaker 8 (00:20:33):

Take for PFAS to go away?

Speaker 7 (00:20:40):

Hello?

Speaker 3 (00:20:42):

That's the end of your question.

Speaker 2 (00:20:43):

Okay. That's something that's in nature. If it's a release to the environment, it can take quite a number of years forever. Chemicals are not a very good name. It does degrade slowly, but that's in point why we want to work with the state and show that our system works effectively at not just cleaning the soil but also removing the PFAS and destroying the PFAS so that it's not in the environment. If you put PFAS under the correct conditions, high temperatures, you can destroy the PFAS.

Speaker 8 (00:21:21):

Okay, I have one more. What is the safest way to handle it?

Speaker 3 (00:21:29):

We don't handle pfas

Speaker 2 (00:21:32):

Pure PAS on a regular basis. So that was not a question that I can answer directly. I can tell you though that any PFA s soil that we might bring into the facility, we have a very clear process for bringing in trucks. They're covered, they come in a designated route, they come into our facility, they dump their load inside a building. We close the doors, we have negative pressure on the facility and otherwise make sure that that air is run through a carbon filter. So any PFA s contaminated soil we might bring into our facilities handled in a very

Speaker 3 (00:22:16):

Appropriate and safe manner. Next question please. The next

Speaker 1 (00:22:25):

Question comes from Tracy Murray Ford, Edward New York. Hello, can

Speaker 9 (00:22:29):

You hear me?

Speaker 3 (00:22:31):

Yes

Speaker 10 (00:22:31):

Ma'am.

Speaker 9 (00:22:33):

Hello. Good evening. And just a comment before I ask my question. I too am feeling really uncomfortable. This is a community that has been devastated for decades with other industries that have just wreaked habit, not only on the economy but just the population. It's a very, very surprising thing to find that there is a company that is in a position to possibly and potentially contaminate the

community is just unconscionable and you can understand the trepidation and fear that is in this community. So I want you to understand that it's very important that you establish a dialogue and yes, we really do need to have face-to-face meetings and I would ask that you please consider that frequently in the future. My question is about the permit that is being requested. This postcard and an article in the Times Union actually gave me information about what's happening and I don't live very far from this facility at all. It's frightening. My question to you is, if this permit is issued, is this a first step in you becoming A-P-F-O-A processing center in the future? Or is this just

Speaker 1 (00:24:22):

30 seconds,

Speaker 9 (00:24:23):

Please wrap up your comment. Is this just a test for you to prove to the DEC that this process works and that you'll be doing this elsewhere? Or are you trying to prove that you are able to do it in this community if it is successful?

Speaker 2 (00:24:42):

Thank you for that question. So we can't speculate at the moment. We believe that the technology that we have in place at Fort Edwards is capable of cleaning PFAS contaminated soil and safely destroying the PFAS that we remove. Not until we have those final results and have the opinion from the DEC. Can we speculate any further?

Speaker 3 (00:25:12):

Thank you. Next question please.

Speaker 1 (00:25:16):

Next question is from Dan Shapely at Fish Scale New York.

Speaker 3 (00:25:22):

Can you hear me?

Speaker 7 (00:25:25):

Please? Go ahead.

Speaker 11 (00:25:27):

Okay, three related questions. So PFAS are a very large family of chemicals. As you know, relatively few can be tested for and even fewer are regulated. So when you say that PFAS will be tested for in the soil pre and post process and in the air, what PFAS are you talking about? Number two, what are the potential harmful transformation products that could be created by incineration in this manner or thermal desorption in this manner? And how will those be identified or tested for? And then finally, if you could just state which PFAS the DEC has ambient air quality standards for I'd appreciate it. You mentioned only PFOA. Thank you.

Speaker 2 (00:26:16):

Alright, excellent questions. Rob, do you want to begin to address those?

Speaker 5 (00:26:20):

I will. I'll start with the later question. New York State DEC to your point has only identified one PFAS compound in their air regulation section and that is PFOA, as you noted, in relation to what we will call products of incomplete destruction picks or PIs sometimes referred to. What we have proposed to utilize are the current methods which have been developed by EPAs Office of Research and Development, which is OTM 45, which looks at TFAS specific compounds OTM 50, which looks at picks or PIs and OTM 55, which also looks at another set of PIX or PIs that are associated with PFAS degradation in relation to soil or solids media. We are, we have authorized, well, I'm sorry, we have proposed utilizing current method EPA methodology 1633, which is the current analysis standard for PFAS in solids.

Speaker 2 (00:27:36):

If you want more information, it's found in the permit application found on our website. But if you'd like us to call that out in a little more detail, if you supply your information in the chat function, we can certainly try to send that to you. Just make sure that you list your question so that we can address it directly. Thank you. Next question.

Speaker 1 (00:28:01):

The next question is from Megan Munoz, Fort Edward, New York.

Speaker 12 (00:28:05):

Hi, good evening. I'm going to shoot off a bunch of questions because you're, I believe like five minute presentation that you blew through missing a whole bunch of things really upset me. So I'm going to start with my questions about you not being able to cite one thing that supports what you want to do in this state. Even though in a county over, we just went through this with PSAS and there was cancer spread through the community, the testing that you want to do with the testing they did, the DOD actually shut it down because of the harm it was doing to the community. You are not going to be able to get rid of a forever chemical, hence the name Forever Chemical. So this is supported by, I'll cite my sources. This is David Bond professor at Bennington College and they did a study showing that actually when you put this in the air, it travels further.

(00:29:08):

You're just taking your fluorine and you are sending it out into the community to harm our children. This facility is behind the school. You're not being honest because I came across a paper where you guys were already burning the PS SASS right here in Fort Edwards, sir. So the lack of knowledge and the lack of information that you're willing to provide us tells me everything we need to know. You did not even contact our public health so that they could get involved with this situation and let the community know how harmful what you want to do is. So if you can explain why you're not able to cite things or even say yes, the ETA 1633 analysis, but you guys don't do testing on site. None of you live in Fort, so none of the accidents or the harm that happens is going to affect you or your families.

Speaker 1 (00:30:07):

Please wrap up your comments.

Speaker 12 (00:30:09):

Thanks ma'am. None of this affects you. So if you could actually cite some scientific data to say this is safe other than the scientific data I can provide from Northeastern College and the College Bennington College, then I'd appreciate it because you don't sound very confident about what you're doing and it's almost embarrassing and degrading to us that you won't even meet in person to have a conversation when this is something that can destroy our community.

Speaker 3 (00:30:39):

Unreal. Alright, thank you for those comments. To

Speaker 2 (00:30:45):

Partially address your commentary, I suggest that you look on the website, both the public participation plan and then the multiple documents supporting the permit application. We answer many of the concerns you have with respect to the science and the underlying information that shows how effective thermal desorption unit can be and the modeling associated with that. The state has required that shows that the emissions will be, there will be little to zero emissions in that they will be safe. Next question please.

Speaker 1 (00:31:24):

The next question is from Richard Fisher, Fort Edward, New York.

Speaker 3 (00:31:28):

Hello. Can you hear

Speaker 13 (00:31:31):

Hello? Hello. Please

Speaker 7 (00:31:34):

Go ahead. Yes.

Speaker 13 (00:31:36):

Okay. I have a couple questions. One is I understand that you're not letting us know where the soil's coming from. Is that true

Speaker 2 (00:31:48):

Sir? Until we get a permit application, we cannot effectively contract with anybody to obtain that soil. So if we do, okay,

Speaker 13 (00:31:56):

Let me give you a press release from your president, Jeff Beswick on 1 22 24 Clean Earth and five other companies, I won't name them, will participate in the remediation of PFASs impacted waste collected from two Department of Defense basis in Pennsylvania. So it sounds to me like this test is going to take soil from Pennsylvania and bring it all the way up here to Fort Edward. That's just my guess. My other

question is why Fort Edward? You have over 90 sites in 50 states and you picked this little town in upstate New York.

Speaker 3 (00:32:36):

I guess that's my question. Why Ford Edwards, Edward, Rob, would you like to address Ford

Speaker 5 (00:32:47):

Edward has been evaluated by the company based on the relationship we have in existence with New York State Department of Environmental Conservation and our work in the past with them on research development and demonstration permits. In relation to your first comment in relation to DOD and the state of Pennsylvania, if you did happen to notice Jeff Bewick's comments, there was likely a link associated with that. If you follow the link, you'll find information on the project itself. Within that link you'll find that the notice that this is, that particular project is slated for other clean Earth facilities where liquids will be treated. That is not a project that is managing solids. That's a project that is managing liquids contaminated with PF Os. Thank you Rob. Next question please.

Speaker 1 (00:33:46):

The next question comes from Simon Coombs, I'm sorry, Hudson Falls.

Speaker 14 (00:33:52):

Hello, can you hear me?

Speaker 2 (00:33:55):

Yes, we can hear you.

Speaker 14 (00:33:57):

Good evening. I just have two simple questions. First one being, where is all this soil coming from? Because is it coming from Fort Edward or is it coming from somewhere else? And two, what is stopping the smoke or whatever is happening at the factories to spread throughout the air and contaminate the waters and pretty much the whole area around Fort Edward.

Speaker 2 (00:34:30):

Alright, thank you for those questions. So I heard where is the soil coming from and how do we prevent any emissions? And so since I've been talking a lot, I'll let Rob, and we've already answered this one once, but Rob, I'll let you answer it again.

Speaker 5 (00:34:44):

As David I just mentioned in the previous answer, we have not identified so locations yet for the material that would be utilized in the research project. And if you look at the application that was submitted, this was also discussed with New York State DEC two purposes. One, we were not positive that the permit would be approved, and two being that we do not have a permit to treat the soil. We're not in a situation where we can contract to receive the soil for treatment. And then the second question is how do we control emissions are controlled at the facility with the thermal oxidizer. Thermal oxidizer is discussed in the application. It is also discussed in the other portions of comments are posted on our public participation website. Thermal oxidizer is a high temperature unit, which based on its

temperature has the ability to degrade various compounds and PF Os. Thank you Rob. Next question please.

Speaker 1 (00:35:55):
The next question is from Mike Volpe and others and for Edward New York,

Speaker 15 (00:36:02):
You're up.

Speaker 1 (00:36:03):
You're up.

Speaker 15 (00:36:04):
Hello, can you hear me?

Speaker 1 (00:36:05):
Yes, please go ahead.

Speaker 15 (00:36:08):
Well, I'm the closest resident to this plant and as far I can smell it every day I have it all of my new vehicles As far as noise, I hear it all night long, the beeping, I hear the loading. As far as traffic, I've seen many close near misses out here in front of my house as far as burning different contacts down here. How come a PA ain't involved the federal government? I see everything that goes on down here. I grew up in this neighborhood. We've been through PCBs, we've been through

Speaker 3 (00:36:53):
Dirt all over the road.

Speaker 15 (00:37:01):
The guy saying, why do you support every new, because you want to sneak it through here because nobody else will let you have it here. So that's all I got to say. I have a public person, person meeting. You got me so pissed off right now that

Speaker 3 (00:37:29):
Come

Speaker 8 (00:37:31):
You can't even pressure wash, sit.

Speaker 3 (00:37:45):
Sorry

Speaker 2 (00:37:46):

We had a bit of difficulty. We had a little bit of difficulty hearing you sir. So we're done. You're having a difficulty with the phone connection. I suggest that you maybe try to call back later and we'll take your call again, but if you would like to submit your comments in writing, we're certainly happy to take those as well. So thank you very much for your comments and we will move on to the next one.

Speaker 1 (00:38:11):

The next question or comment comes from Amanda Durkey, Fort Edward, New York.

Speaker 16 (00:38:16):

Hi, can you hear me please? Okay, so I want to start by saying Hi, Mr. Martin. You and I had some email correspondence. I want to repeat what some people have already said that this public hearing needs to occur to have an in-person option. I can say that there is so much getting lost in translation right now in this format when every single person that's coming on is saying, can you hear me? Can you hear me? That's no way to have a discussion about this. Phones are cutting in and out. It's tough to follow what is happening. I would request that you follow what you have outlined in your public participation plan with regards to actively seeking on page one. Your objective is to actively seek and enhance public participation during the review of this. By doing this as a remote option and having us participate in this way on the phones is not actively seeking and certainly not enhancing public participation.

(00:39:19):

Page nine again, states things about utilizing a range of engagement strategies to facilitate participation, involvement and direct communication with the community. This format certainly does not facilitate participation is very challenging. It's very difficult. People cannot figure out how to make this work. I've never participated in a meeting such as this. Page nine again in your public participation plan states that during this meeting there will be a question and answer portion where the floor will be open for attendees to ask questions and make remarks. This is our open floor on a phone line. There's technical difficulties that are occurring. We really have no clue how many people are actually participating in this meeting because some people don't understand how to use the technology so they're logging in with other people. You have a record of who has logged in. In my personal opinion,

Speaker 1 (00:40:14):

It's a

Speaker 16 (00:40:14):

Calculated move.

Speaker 1 (00:40:15):

30 seconds, please wrap up your comments.

Speaker 16 (00:40:17):

Understood. It is my personal opinion that this is a calculated move you do not truly want to seek nor enhance public participation. We as a community, the outlying surrounding communities deserve an opportunity to be able to meet in person, to communicate our things effectively, hear from you effectively. This is not

Speaker 8 (00:40:35):

Effective.

Speaker 3 (00:40:40):
Thank you for your comment. Next question please.

Speaker 1 (00:40:45):
Next question comes from Melanie Dickinson, Ford, Edward, New York

Speaker 16 (00:40:51):
Opinion, this calculated move.

Speaker 1 (00:40:53):
Melanie, please go ahead and please mute your webcast

Speaker 16 (00:40:57):
Community

Speaker 3 (00:40:58):
Ing. Melanie, are you there? Melanie? Yes. I'm mute your webcast.

Speaker 1 (00:41:10):
I'm sorry, what? I'm sorry what? Please mute the webcast. We're hearing Amanda's questions still. Next question comes from,

Speaker 17 (00:41:18):
Hold on,

Speaker 1 (00:41:18):
Melanie. Okay, we can move on to the next question if you'd like.

Speaker 17 (00:41:25):
No. Okay. Can you hear me now?

Speaker 18 (00:41:30):
Yes we can. You have to meet your webcast,

Speaker 17 (00:41:31):
Ma'am. You have to turn that off. Mute that. I'm sorry. Okay.

Speaker 1 (00:41:43):
We can't continue until it's not echoing.

Speaker 17 (00:41:45):

Okay. I have issues with this. I have a number of issues with this facility. Let me ask you a question. Currently, are you using the same facility that you ESMI used to do petroleum based soil burning. Hello?

Speaker 5 (00:42:14):

Hello? That is correct.

Speaker 17 (00:42:17):

Okay, so you are currently a title three facility burning Toxic Forever Chemicals requires a Title five. So my concern is that you are poorly burning petroleum soil. Now I smell it and it's awful. How bad is it going to get when you start burning toxic and that we may not even know that we're breathing it. So I have a very, very big problem with this facility. It's not adequate, it's too small. We're a very small community and there's a lot of people around this site. It's not a site that is in the middle of nowhere where it's not going to harm anyone. We don't have PFLA here like in these other areas and you are going to be bringing it into us. We have enough with the PCBs. We don't need anything else. The community is constantly fighting to keep you people out of this area. Please, please don't come to this area. Find a place that's out in the middle of nowhere and does not affect the community. Thank you.

Speaker 3 (00:43:38):

Thank you Melanie.

Speaker 8 (00:43:44):

Next

Speaker 1 (00:43:45):

Question comes from Michelle Fulcom, Hudson Falls, New York.

Speaker 19 (00:43:51):

Hi, how are you? Good. Please go

Speaker 7 (00:43:54):

Ahead.

Speaker 19 (00:43:55):

Hi, like everybody else, I'm against this. We have enough issues with the PCBs. That being said, I do have some questions like how is this safely going to, if you get the approval to do this, how is this going to be safely brought into our community without any spillage on our roads? What if, sorry, I'm reading. I wrote things down. How long does the soil sit in your facility before it's getting, I guess burnt? How are you safely storing it and what if something breaks and now we have all of these toxins going into the air.

Speaker 3 (00:44:58):

That's it. Thank you Michelle, for the questions

Speaker 5 (00:45:05):

To work through them back from the beginning. In relation to the transportation and material to the facility, transportation occurs with permitted haulers that have sealed truck beds and covers some materials brought in and permitted hauled vehicles in relation to how long the material sits at the facility. That time can be variable. It's based on other inbound soils in relation to this particular project. There will be some time where it does sit in storage prior to it being processed. And that's inside though, and that is inside of a storage building. All soils received, the facility are placed inside of the building that you would see and resides in the center of the facility proper in relation to equipment failure, which I believe was the last question, not T. In relation to equipment failure, the facility does have processes in place to manage issues that do arise that are in association with the facility and the equipment safely shut down to safely address any issues. Correct. Okay, very good. Thank you

Speaker 2 (00:46:24):

For that question. Next one.

Speaker 1 (00:46:28):

The next question comes from Jane Donahue at Fort Edward New York.

Speaker 3 (00:46:33):

Hello, can you hear me? Hello?

Speaker 7 (00:46:37):

Yes, please go

Speaker 2 (00:46:38):

Ahead. Yes, sir. Jay,

Speaker 10 (00:46:40):

First of all, I want to echo the sentiments by others. We do need a public hearing and the in-person option, this is kind of unbearable, but be that as it may, let's deal with what we have. First of all, you're familiar, we have some infrastructure problems in the village between the bridges, the roads, and I have a concern with V-E-S-M-I, the location. There's one entrance and one egress. So if we take a look at that, I appreciate your confidence in the transportation of this materials. Matter of fact, you stated you've got clear process to bring in trucks and that being very appropriate and safe. That's kind of nebulous. I don't think you understand the urgency that could be involved here because I don't care what safeguards you have set up. And I'm sure in your eyes they're good living here. They're probably not. But remember the word accident is in the dictionary for a reason. Accidents can happen.

(00:47:39):

My question, so how will those accidents, those the accidental spills, contaminations, how will they be handled? Especially understanding the proximity of the building with the school and the public park. Now that's going to take expediency to handle anything that's like this. So I don't know if the existing forms that you have in the ESMI down there are are going to help this whole project in case something does come up. And my other thing is if there is an accident, something does spill, God forbid we hope that doesn't happen, that'll change the environment. So how's that going to affect the secret process when you go through this entire thing?

Speaker 1 (00:48:21):

30 seconds? Pardon? Please wrap up your comments.

Speaker 10 (00:48:23):

Okay, I'm done there. I'm going to hang up so I hear, I can listen to the answers.

Speaker 3 (00:48:31):

Thank you Jay.

Speaker 2 (00:48:34):

I think your primary questions were focused on trucking the safety of potential spills. And so hopefully I've summarized that and I'll let Rob address that.

Speaker 5 (00:48:49):

If there happened to be an incident with the transportation of material to the facility, the cleanup of those materials would be managed by spill contractors. The facility itself controls what occurs at the location and there are processes in place. Third party contractors would be performing the spill cleanups that would occur offsite in relation to any sort of

Speaker 3 (00:49:19):

Transportation spill in relation to transportation incidents with

Speaker 5 (00:49:32):

The facility and spills. We would have to evaluate if that's occurred, but by recollection, I do not believe that we've had a vehicle incident where a spill has occurred offsite in process or transportation to the facility. But we can verify that information and provide it as a public comment response. Thank you. Robs

Speaker 2 (00:49:55):

Next comment or question please,

Speaker 1 (00:49:58):

As a reminder, please mute your webcast when you're making your comment via the phone line. The next question comes from Dale McCline, Fort Edward, New York.

Speaker 3 (00:50:09):

Hello, please

Speaker 7 (00:50:12):

Go ahead.

Speaker 20 (00:50:15):

Okay, so as someone who lives in Fort Edward, I'm scared to even drink the water because of how it might be affecting my immune system or my health. So I just believe that as someone who has lived here for only two years, but I still feel like I am a citizen of Ford Edward. I am scared of what is happening here and I don't really like it. But it sounds like you're not really taking into account the people who live here. And I believe that's not the correct way to go about it. I believe if you are to do something, you should put all the safeguards you can on it. But I guess my question, one of them at least would be if when you are getting rid of the PFAS, according to you, you said that there would be water vapor coming out of the facility. And I believe you also said that you wouldn't be dealing with water. So

Speaker 3 (00:51:43):

I guess that's the end of my question. So in clarification to,

Speaker 5 (00:51:56):

I guess provide clarification to your question, the facility does not discharge liquid water as part of its operation. What is seen as David had mentioned at times being emitted from the stack is a steam plume, which does appear based on atmospheric conditions. And this time of year, if you were to view the facility, you would happen to notice a steam plume that's associated with the process stack. So we do not directly discharge liquid water moisture is emitted

Speaker 2 (00:52:42):

At the process stack after it's gone through the oxidizer and been cleaned of contaminants. Thank you for the question and we'll move on. Thank you.

Speaker 1 (00:52:55):

The next question comes from Nora Hunt, Queensbury New York.

Speaker 14 (00:53:00):

Hello, I'm Nora Hunt. From what I understand, burn PA carcinogens are what

Speaker 8 (00:53:09):

Effect?

Speaker 3 (00:53:14):

Nora, can you please repeat your question?

Speaker 14 (00:53:18):

When you burn PFAS can be extre and what areas will these carcinogens?

Speaker 2 (00:53:29):

So to repeat that question, when we process soil and run the emissions through our oxidizer areas, what local geography might be affected? So if you look at our permit application, it's also discussed in our Triple P, our permit public participation plan. We've evaluated potential impacts to the local community. And this was something I direct directly, directly in my brief comments at the beginning. We believe there will be no unsafe impacts to the community. We've modeled emissions. Those models have been

conducted per the state requirements. We've compared any potential emissions with the state ambient air quality numbers and any potential emissions are below those standards.

Speaker 5 (00:54:31):

Just to further on the comments, since we've had a few questions in relation to emissions and modeling, the model is included in the permit application that is posted on the public participation website. So that information can be viewed via access at either the public website that we've posted or at the Hudson Falls Library. And we will also be placing the documents for public view in the Fort Edward Library. Thank you, Rob. Next question.

Speaker 1 (00:55:11):

The next question is from Ava Manley at Hudson Falls New York. Hello,

Speaker 21 (00:55:18):

Ava,

Speaker 7 (00:55:18):

Please go

Speaker 21 (00:55:18):

Ahead. I just have one question and if you are releasing CCF four, which is 7,390 times stronger than CO2 as a greenhouse gas, why aren't you stating there is no environmental

Speaker 8 (00:55:33):

Impact of this project

Speaker 3 (00:55:40):

In relation to CF four emissions?

Speaker 5 (00:55:43):

As I just noted in the previous question, information associated with those emissions and the modeling associated with CF four is included

Speaker 3 (00:55:53):

In the permit application and those emissions are below any state

Speaker 2 (00:56:00):

And those any potential CF four emissions are below the state of New York's ambient air quality standards. Thank you. That was a good question. Thank you.

Speaker 3 (00:56:13):

Next question.

Speaker 1 (00:56:16):

As a reminder, please mute your webcast when you're making your comment via the phone line. And the next question comes from Reese Mosco. Hudson Falls, New York.

Speaker 8 (00:56:27):

Hi. I was just wondering how long it takes to burn the chemicals.

Speaker 3 (00:56:34):

Alright, good question. How long does the process

Speaker 5 (00:56:38):

Take, Ralph? I'll answer that in two parts. Soil that is treated within the rotary kiln, or I believe David May have referred to it as a Tumblr at the beginning of his presentation, is processed over a timeframe of about 10 minutes. Our thermal oxidation process has a retention time of about 2.1 seconds, and that's the oxidation process where the absorbed contaminants from the soil are oxidized and destroyed.

Speaker 2 (00:57:13):

So it happens very quickly when we begin to process the soil. Each pound of soil moves through the system very quickly, less than 15 minutes. And then as Rob just noted, it's the high temperatures and the airflow through the oxidizer. It only takes a few, excuse me, a seconds to destroy those contaminants. Excellent question. Thank you. We'll move on.

Speaker 1 (00:57:41):

The next question on page two, me, Ford Edward, New York, please go ahead.

Speaker 22 (00:57:47):

Hi, I'm a lifetime resident Fort Edward, and you admitted how this contaminated soil is a forever chemical that can leach into our drinking water. So my biggest question is, can you a hundred percent guarantee that contaminated soil will not leak or spill when it's being transported to your facility around town? And I know James Donahue already questioned what is going to happen if there's a leak. I work very close by at the school, at the park, having practice there. And what's special about these trucks that they're able to safely bring this soil through and this designated route that the trucks take. Is it going by my house? Where is this designated route where these leaks could potentially happen? And just to kind of emphasize what Amanda Durkey said, not everybody is here that is interested in this event. People were poorly told that this was happening and they've had a really hard time to attend this meeting and we're really denying their voices by not having this in person. Clearly there's technical issues. I want to have an in-person hearing and just to your point, you keep saying that, well, the smoke stack that you're seeing is visibly water vapor. That's what I teach my students too, that in a cold day when you breathe out visibly, you see the water vapor. But we all know we're also emitting CO2 as well. It's there. You can't see it with your naked eye, but there's other things being emitted. So that would be my question. Can you a hundred percent guarantee there will be no leaks in our town?

Speaker 8 (00:59:25):

Thank you,

Speaker 3 (00:59:30):

Paige. Thank you for the question.

Speaker 2 (00:59:35):

I think we really have to go back and look at the compliance record of the Fort Edward facility and some of the comments that Rob has made earlier. We've had no, as far as we can remember, no identifiable accidents or releases. We've had a stellar compliance record over the 20 plus years that the facility has been in operation there. So that's where we put our hat when it comes to us of being able to say that we believe that we will protect the local community. Thank you for that question. We'll move on to the next one.

Speaker 1 (01:00:12):

The next question is from Jeannie Mullin, Fort Edward, New York. Please go ahead.

Speaker 23 (01:00:17):

Hi. How do you justify processing hazardous materials while the facility is located on the Empire State Trail? It's the bike path. There's families that ride their bicycles there. And the other thing I have a concern with is you stated a while ago that when product comes in, you close the doors, you have negative pressure when you treat the PFAS, wait a minute, you don't have a, how can you be making that statement when you don't have a permit yet to treat PAS? Thank you.

Speaker 3 (01:00:57):

So I'm a little unclear on what the question was there there, Rob.

Speaker 5 (01:01:03):

I think the question perhaps ended with how are we processing PFAS if we're not currently permitted to manage PFAS that as David had made in the presentation earlier, not managing soils that are known to have PFAS contaminations. I believe there was also a question in relation to the facility and the building. The building is fitted with carbon bins, which are used to draw air from the building itself through activated carbon, which is then emitted to atmosphere. So I believe part of the question may have been in relation to emissions associated with the building and the carbon beds are a control mechanism for those emissions.

Speaker 2 (01:02:02):

Thank you, Rob.

Speaker 3 (01:02:04):

Next question please.

Speaker 1 (01:02:07):

The next question comes from the Monroe Hudson Falls, New York.

Speaker 24 (01:02:13):

Hello. My question is, how will accidentally spills be handled at the factories and what impact would a spill have on the environment?

Speaker 2 (01:02:24):

Very good, Rob, I'll let you take. So what would happen if we had a spill at the facility?

Speaker 5 (01:02:32):

Sure. So as was noted, soil as it's received, is stored in the storage building which limits its movement to the environment. If there was soil that during the dumping process ended up outside of the building, those soils would be moved into the building itself material, which is conveyed from the building directly to the process unit. If there is a spill that occurs of soil. Now again, we're talking about solids. Those solids are cleaned and they're placed back into the building for storage until they're conveyed again to the process unit for treatment.

Speaker 2 (01:03:14):

Thank good question, moderator. Next commenter.

Speaker 1 (01:03:22):

The next question comes from Lisa Oand Monroe, New York.

Speaker 25 (01:03:27):

Hello. I'm curious as to how the soil has been contaminated, what sources and I've looked at online, but I'd like you to tell the folks that are listening how this soil has been contaminated. Secondly, is your company currently working with the US Federal government? And lastly, this is just a comment because I know if I ask the question, you're going to say you would feel comfortable, but imagine yourself, your children, your elderly parents living right next to this. How comfortable would you feel about it? You're going to tell me you would feel comfortable, but guarantee you wouldn't be buying a house here or just typical upstate New Yorkers that just keep getting contaminated and tortured by companies like yourself.

Speaker 2 (01:04:16):

All right, thank you for those comments. And the questions, I'll repeat the two questions I heard. One of them was, how do we know what materials contaminate the soil? And whether we're talking about PFAS or not, any soil that we bring into the facility, it just doesn't show up on our front door. We go through a very clear process, strict process with the supplier of the contaminated material to understand what materials contaminate that soil. There has to be a profile developed, we have to approve it, and then that's how we get. And if that material, that contaminant is something that we can manage, treat at the facility, then we accept it per our permit conditions and we process it safely. Your other question had to do with whether or not we work. We have contracts with the federal government. We do have some clean Earth, and environ is a very large corporation. So specific to your question, but yes, we do work for the federal government in various ways.

Speaker 3 (01:05:26):

Next question please.

Speaker 1 (01:05:28):

The next question comment comes from Michael Dickinson for Edward New York.

Speaker 26 (01:05:32):

That's

Speaker 1 (01:05:32):

Me at the facility. Did we accepted for our permit condition? Michael, please mute your webcast. Hold on.

Speaker 26 (01:05:39):

Yes, I have a question. You stated that 99.9% of the contaminants are removed from the soil. How does that apply to the air? That's vapors that are coming out of the spec. And how do you know for sure what percentage is coming out? That's question one. Question two was, as someone else stated, the bike trail goes right by your facility and you're telling me that the building is under negative pressure, but I live right nearby and those doors are left open all the time. So how do we know that you're going to follow procedures with this process?

Speaker 3 (01:06:33):

Thank you. Alright, thank you for those questions, Michael. Rob, the

Speaker 2 (01:06:40):

First question was about the destruction efficiency for air emissions,

Speaker 5 (01:06:47):

Destruction efficiency for air emissions in relation to this RD and D project will be measured in evaluated in accordance with EPA Office of Research and Development methods, which have been put into Operation four emissions evaluation. Those are OTM 45, 50 and 55. Those are referenced in the application which has been submitted to New York State DEC. Those analytical methods will be utilized in determining the destruction, removal, efficiency of the process. But other studies and research show, as was also noted previously and is contained in the application and is contained in the comments associated New York DC clarifications. Those references are available via the permit, which is available on the public participation website. As David noted, if there is a request to have specific reference provided to those, if you put your information into the chat that's associated with this public participation meeting, we can provide that information directly. And you can also comment via the public participation website or we also have posted a phone number for comments to be received as well. Very good.

Speaker 2 (01:08:18):

And then there was a question about the

Speaker 5 (01:08:21):

Facility and the doors facility and the doors are operating in accordance with the operations and maintenance manual, which has been approved by the State of New York. Okay, thank you very much.

Speaker 2 (01:08:33):

Moderator, next question.

Speaker 1 (01:08:37):

As a reminder, please mute your webcast when you're making your comment via the phone line. If you have connected via phone to ask a question or to comment but have not yet, press star one to queue up to speak. Please do so now. And our next question comes from Andrew Smith. Hudson Falls, New York.

Speaker 3 (01:08:54):

Hello. Hello, Andrew? Yes sir.

Speaker 27 (01:08:58):

Can you hear me? I have two questions. My first one is for transportation. Are you guys using back roads for the trucks or are you just going to use the normal roads that everyone is using? And my second question is, can I say cure? Like cure the soil? Are you guys putting it back? What does that mean? Ask my questions.

Speaker 3 (01:09:24):

Alright, thank you Andrew.

Speaker 2 (01:09:26):

So the first question is, and I'll let Rob handle this one as well. Truck routes

Speaker 5 (01:09:32):

To answer the question as it was related, trucks entering the facility do not use back roads. They use primary routes to travel into and outside of Fort Edward itself.

Speaker 2 (01:09:51):

And then the second question was, I think Andrew used the term cure, but I think what he was getting to is when the soil is clean, what happens to it?

Speaker 5 (01:10:04):

Port Edward facility holds a beneficial use determination from the state of New York. That beneficial use determination allows us to place treated soil back into the economy. As David had mentioned, in vary clean earth, our propositions are to recycle as much material as possible. That material can be sold to the public or commercial industrial entities and be reused in accordance with that beneficial use determination that is determined based on analytical associated with the treated soils. So based on soil contaminant, there are specific criteria that has to be met in accordance with state regulation that then allows us to reutilize that soil as a product. Got

Speaker 2 (01:10:57):

It. So the state has standards, we clean the soil. If we meet those standards, then we can reuse it. If we don't meet the standard, we process the soil again until it does meet the standard. And we do testing all the time to make sure that that happens. Thank you. Alright, next question.

Speaker 1 (01:11:14):

Next question is from Isabella Print. Hudson Falls, New York. Hello. Please

Speaker 7 (01:11:22):

Go ahead. Hi, Isabella.

Speaker 28 (01:11:25):

Hi. So how can you verify that all of the PS aos have been removed from the soil if the Environmental Protection Agency still states that all the pfas

Speaker 8 (01:11:41):

Aren't even known yet?

Speaker 3 (01:11:48):

So the question is how can we verify

Speaker 2 (01:11:51):

All the P-P-F-A-S are removed from the soil? There are thousands of different types of variations of a perfluorinated compound, but the EPA has identified those that are most applicable, most toxic, and they have testing mechanisms for them. As we mentioned earlier, 1633 being the primary test method to test for soil. So the U-S-E-P-A has done their analysis and determined that at least at this time, those are the best ones. Those are the best pollutes that we should be testing for to ensure that the soil is clean enough for safe use. Thank you, Isabella, for the question. Next,

Speaker 1 (01:12:42):

The next question comes from Riley Richards, Hudson Falls, New York.

Speaker 24 (01:12:48):

Hello. What precautions will be to ensure that the soil being transported does not leak, spill, or contaminate other regions during transport?

Speaker 5 (01:13:04):

Thank you for the question. As we have discussed, materials transported in permitted vehicles, they are covered and the gates are sealed. Enclosed to just make a term on clarification, leaking generally refers to materials that are liquids. So we are not allowed to receive liquids at the location. So just to clarify, right, we're speaking about solids transportation.

Speaker 3 (01:13:41):

Thank

Speaker 2 (01:13:41):

You, Rob.

Speaker 3 (01:13:43):

Next question.

Speaker 1 (01:13:46):

Next question comes from Ben brand. No, port Edward, New York.

Speaker 29 (01:13:53):

Good evening. Just confirming that you can hear me all right?

Speaker 15 (01:13:57):

Yes, Ben?

Speaker 29 (01:14:01):

Yes sir. Once again confirming you can hear me all right?

Speaker 2 (01:14:05):

Yes, we can.

Speaker 29 (01:14:07):

Okay, thank you. So this is a two part question, but first I just want to reiterate what's already been said numerous times that an in-person meeting or series of meetings regarding this permit application and whatever else is involved with it, is absolutely critical. This format is just, it's not sufficient, it's not acceptable. So the question again, two parts. The current state classification of the contaminated soil that you are trucking in the PFAS contaminated soil, is that considered a regulated waste or a hazardous waste? And then the second question, so I don't get cut off here. The current stack scrubbers at the SMI facility, are they designed for and sufficient for managing the byproducts of the thermal destruction of the pfas? And what is the monitoring regimen for those emissions during this proposed two week RD and D permit and who actually receives the results of those monitoring Are those publicly accessible documents? Thank you.

Speaker 2 (01:15:28):

Alright, Ben, those are a lot of questions, but I think we've written them down. I want to start by answering, just to make sure that we're clear, that the facility does not currently accept any soils that have been identified containing PFAS. And we don't manufacture PFAS. We don't use PFAS. So there is no, obviously you're concerned, there is no PAS there right now. So the question then, you had a number of questions about regulated regs versus hazardous waste stack scrubbers monitoring, et cetera, and I'll let Rob begin to answer those

Speaker 5 (01:16:08):

In relation to PFAS being a hazardous waste, hazardous waste regulations, which are often referenced as CRA PAS is not a hazardous waste. PFAS at present is managed as a non-hazardous waste within the state of New York and by the federal government. The next question I had written down was in relation to the stack scrubbers and if they would be applicable for products that would be associated with PFAS at the facility. We presently do not have a scrubbing system that is on the stack. One byproduct of PFAS oxidation is hf, which is hydrofluoric acid, which is actually a of the complete mineralization of PFAS compounds. If such requirement was necessary for us to control an emission at the stack of hf, there are well-known implementable technologies to manage such emissions. At present. As was noted in our application, those emissions do not exceed any state or federal guidelines for emissions. The last question I have is in relation to permitting, and I believe it actually was in reference to whether or not

the facility, what the permit status of the facility is. The facility is permitted to receive non-hazardous waste. We maintain a solid waste permit with state and an air resources permit with the state. Those permits are both referenced in the application, the front section of the application, which is available via the website.

Speaker 2 (01:18:19):

Thank you, Rob. Next question.

Speaker 1 (01:18:23):

The next question comes from Sarah Brandle, port Edward, New York. Please go ahead Sarah.

Speaker 18 (01:18:32):

Hi there.

Speaker 7 (01:18:35):

Hello.

Speaker 18 (01:18:36):

First question, what is the upside or benefit to the Ford Edward community for ESMI to take in the PFAS contaminated soils in and can you tell us how many people are on this meeting? And additionally, how many questions have been submitted to you via the chat box? And you missed my husband's questions. He wanted to know what the monitoring, monitoring regimen was of the air emission.

Speaker 2 (01:19:12):

Thank you. Alright, Sarah, let me start. I'll start with the first two and I'll let you, Rob, I'll let you take the monitoring requirements. So as I addressed in my summary comments at the beginning of this hearing, first of all, we don't handle PFAS. We don't generate PFAS discharges of water or such, but we do certainly know that there are some people in the New York State communities having PFAS issues in their drinking water. The upside for the people in New York is that cleaning PFAS contaminated soil will alleviate PFAS contaminated drinking water. And that's what's most important to the, I believe is what is most important certainly to me and my family. And so that's the upside, being able to manage PFA S contaminated soil to prevent PFA s contaminated water. The other, the next question was number of questions or a number of people on this website.

(01:20:19):

Yes, we've been monitoring that. We were keeping track of that. We've had over 300 people registered at varying time today. We had over 400, 547 people registered at varying times. Today we've had from 50 to a hundred people on the call and we've had a number of people that have submitted written comments. A number of those we've already addressed through these verbal comments. When we are all done and completed here, as I noted, we will summarize, compile, and address all of those comments on our website that will include exact numbers on the number of people that participated and the number of questions received. I'll turn the last question over to you, Rob, which was monitoring requirements, a regimen monitoring regimen, I

Speaker 5 (01:21:08):

Believe understood monitoring regimen. And again, make note that the information associated with emissions testing is included in the application which you can view verse via the public participation website. We will be testing as noted PFAS and products of incomplete destruction via O TM 45. These are EPA methods OTM 45 OTM 50, and O TM 55. We will also be looking at other potential compounds such as hydrofluoric acid as it was mentioned earlier, HF via Method 26 A if I remember correctly. And I will verify the other test methods that are in there and we can post that as a response to a question. But the monitoring requirements in total that are in there are included in the submission. Finally, I will note prior to us performing that emissions testing that plan and those methods need to be approved by New York State Department of Environmental Conservation.

Speaker 2 (01:22:28):

Thank you

Speaker 3 (01:22:30):

Moderator. Next

Speaker 30 (01:22:31):

Question please.

Speaker 1 (01:22:32):

Next question is from William Ru Hudson Falls, New York.

Speaker 30 (01:22:38):

Good evening, gentlemen. My first question is I keep hearing you guys refer to the EPA and New York State's DEC. And I would like to know if in your opinion, that those two groups have been ahead or behind the curve when it's on PFAS and P FOAs? Because to me they've been behind the curve for quite some time. And my second is your employees working in the plant? What kind of PPE do they have to wear?

Speaker 2 (01:23:13):

So thank you for those questions, William. I'm not going to pass judgment on EPA or the DEC and how they've been working. I can tell you that we're working as diligently as we can to follow the regulations, ensure that our plant operates safely as it's permitted now. And certainly as we've explained many times, make sure that if we do get this permit to do this short two week test that we follow all the rules that the DEC applies to us. The last question was about PPE at the facility and I'll let Rob answer that.

Speaker 5 (01:23:50):

PPE is provided to the employees based on OSHA regulation and evaluation of potential hazards at the facility in accordance with hope, in accordance with OSHA regulation.

Speaker 2 (01:24:10):

So it's fair to say that we abide with by those regulations and otherwise utilize the correct PPP for the hazardous situation. Thank you. All right, next comment please.

Speaker 1 (01:24:25):

Next question or comment comes from Dr. Denise Mayer for Edward New York, please go ahead.

Speaker 31 (01:24:33):

Hi, this is Dr. Mayer. So you keep referring to the emissions that you think you're not going to release, but you also in your permit rely heavily on citing the EPA guidance that was just released in April of 2024. And in that guidance, they talk about a paper by shields at all in 2023. And you cite that paper in your list of citations. It's the only one that's actually a peer reviewed paper. So the other ones are just industry based. So this paper and the EPA really points out that the process that you're defining in your plant doesn't meet the criteria for complete combustion. And it's inadequate to only report destruction efficiencies that those products of incomplete combustion are important. And we don't, I live here in Fort Edwards, I don't want you just to report what was released. I don't want them to be released. So the temperatures that you're saying you're going to use are 1500 to 1800 degrees Fahrenheit, but this paper says you really need a minimum of 2012 degrees Fahrenheit, which is a big difference. These chemicals, I'm going to just keep going. I don't want to stop because I know you're only going to give two minutes. These contaminants are an emerging concern. And so the methods, the guidelines, everything is changing constantly because we're always learning so much more. EPA did designate PFAS is hazardous materials. Just this past April you did this permit application in 2023. Since then, a lot's changed also in your permit. Department of Health had to report on the risks of PFAS.

Speaker 1 (01:26:34):

I'm sorry, they couldn't even please wrap up your comments

Speaker 31 (01:26:37):

Because they stated many, many times that the toxicology data are too limited to evaluate their risk. So they had to use surrogates of similar type compounds. But we know those do not have the same biological impacts.

Speaker 1 (01:26:56):

Dr. Mayer, I believe you've come to the end of your time.

Speaker 3 (01:27:00):

Alright, thank you. I really do. The next question comes from

Speaker 1 (01:27:20):

Katie to group Fort Edward New York.

Speaker 2 (01:27:24):

Oh, I apologize. Wait, moderator, I'm sorry, I was on mute. Can we,

Speaker 7 (01:27:29):

Oh, I'm sorry.

Speaker 2 (01:27:31):

I'm sorry. My fault Rob and I were going to try to answer Dr. Mayer's questions. I apologize.

Speaker 1 (01:27:37):

Thank you.

Speaker 2 (01:27:40):

And we'll get to the next caller in just a moment. So you asked a number of questions, Dr. Mayer, some important ones. Rob and I are very familiar with the Shields et al paper. I think it was somewhat misrepresented in your comments, but I'll let Rob provide some brief background on that paper.

Speaker 5 (01:28:03):

Sure. Mr. Shields of V-P-O-R-D has actually provided additional work since the time of the submittal. In his particular work though, he's working with equipment that is not specific to the For Edward facility, a lot of his work was done with the rainbow furnace, which resides in Carolina, which does act in a similar fashion to our thermal oxidation system. He's also done work and not knowing the exact reference to your point, but has actually done work which has demonstrated the fact that PFAS can be oxidized at a lower temperature than the 2000 degree note that you have you previously made comment to. So if it's specific document which is associated with Mr. Shields, we'd be happy to address those comments specifically via written comments as well.

Speaker 2 (01:29:07):

In addition, Dr. Shields talks about destruction, efficiency, DRE, and we agree that destruction efficiency is not the only way to measure the effectiveness of a unit like this. And that's why, and remember that the Shields paper was written before the EPA came out with the analytical methods we had talked about earlier, OTM 55 and 55, which test for these products of incomplete combustion. And so his point that he tries to make there is yes, look at destruction efficiency, but you will do a better job if you use these. And he was implying that you need these test methods to look at the emissions. And now we have the test methods and that's why we're doing what we're doing here as in part. And then the last question from Dr. Me was about the hazardous materials designation. Can you kind of tease that out

Speaker 5 (01:30:07):

For folks? So right, EPA has designated POA and PFOS as hazardous materials, but that classification does not make those materials a hazardous waste. So they are still classified as a non-hazardous waste.

Speaker 2 (01:30:29):

So a lot of people across the country have commented on that as well. But that's within the regulatory structure, both at the federal level and state level. That's a very important unique designation and applies here and we follow the rules that the state has applied to us. Alright, so once again, I apologize, fed screw up, we were on mute, but let's move on to the next question.

Speaker 1 (01:30:55):

The next question comes from Katie to group for Island New York. Please go ahead, Katie.

Speaker 32 (01:31:00):

Yes, can you hear me?

Speaker 1 (01:31:02):

Yes, please

Speaker 32 (01:31:02):

Go ahead. There's Katie. Okay. Hi. I have a really basic question. My question is, you're a business, is that correct?

Speaker 3 (01:31:14):

And your question is why don't you finish your question?

Speaker 32 (01:31:18):

Okay, well I'd like to know, you're obviously a business, you're not a nonprofit, is that correct? And so in regards to that, how much profit would you make from the company that you have and what would be the final product that you would be selling from this process?

Speaker 3 (01:31:44):

Alright, Katie, thank you very much for that question. So

Speaker 2 (01:31:47):

To summarize the question is what is the final product that comes out of the Fort Edwards operation?

Speaker 5 (01:31:58):

Final product that comes out of the Fort Edward operation is treated soil in relation to what we would be treat, I guess I believe the comment would be was selling in relation to the material that comes forth from the facility would be the soil that is treated that meets the beneficial use determination, which has been granted to the facility by the state of New York. So as that meet that criteria can be placed depending on contamination levels in residential, commercial and industrial applications. And that would be the material that would be sold out of the Fort Edward facility, which is the treated soil.

Speaker 2 (01:32:47):

It's clean enough, it meets the state standards, and then we can sell it at whatever the market price might be. Thank you Rob. Next question please.

Speaker 1 (01:32:59):

Next question comes from Ron laforge, Fort Edward, New York.

Speaker 33 (01:33:06):

Ron, hi. I would just like to say I am a fairly new resident to Fort Edward. I've only lived here for a few months. I would just, sorry, just got to collect my thoughts. Why is your processing facility so close to living, breathing humans that could in fact get possibly diseases from all of this? And also you're driving the infected soil through main roads across in town where there are people there low income housing too, so they probably couldn't even get the healthcare they need and it's just why couldn't the facility be in a very open place with almost no people around and using back roads. But also I would just like to say I have heard that the emissions can also cause cancer and I may be wrong, but I myself am at a serious

risk of cancer and I would just like to say that I'm a young kid, I am only 14. I will turning 15 in a week and I would like to say I would want to live past the age of 15 just because I think it might be fine.

Speaker 1 (01:34:52):

Ronan, 30 seconds, please wrap up your comments.

Speaker 3 (01:35:03):

Ryan, thank you very much for your comments. Next question please.

Speaker 1 (01:35:09):

The next question comes from Madeline Moffett, Hudson Falls, New York. Hello.

Speaker 14 (01:35:20):

I would like to ask, as you're burning these soils, what will be the number one benefit for our community

Speaker 8 (01:35:26):

And citizens?

Speaker 3 (01:35:32):

Madeline, excellent question. As we noted

Speaker 2 (01:35:34):

Earlier, there's PS Serious PFAS contamination in various parts of New York and it's going to have to the state, other communities are struggling with how to clean that up. Showing the state of New York that a process, the technology that we have there, the thermal desorption technology showing that it is capable of cleaning the soil to meet state standards as well as destroying any PAS emissions to meet other state standards is critical to not just the state but the nation finding a path forward to address the PFAS contamination issues that we're all dealing with. Good question. Next comment please.

Speaker 1 (01:36:27):

Next question or comment comes from Josh PLU for Edward New York.

Speaker 7 (01:36:35):

Josh, please go ahead.

Speaker 3 (01:36:37):

Hello, can you hear me?

Speaker 7 (01:36:39):

Yes, can you hear me? Go ahead.

Speaker 34 (01:36:44):

Okay, first of all, I'm going to be a little redundant here. I'm opposed to everything going on down here. Ford Edwards had enough, but I won't get into that. So my question is, there's byproducts hf Now, I was on a hazmat crew for years. HF is no joke and there's many more byproducts from this. My thing is what's really bothering me is everything you answer is just to meet the status quo. What you're permitted to do, you won't go above and beyond down there. To me, this is all lip service. I strongly disagree with this whole online meeting. We definitely need in-person meetings, but my thing is what if all of your data is wrong? First off, you stated you want to lessen the carbon footprint. It's a known scientific fact that if you do not destroy the forever chemical, and you folks have mentioned several times destroying or just destabilizing 'em, if they're not destroyed, it can create different byproducts, different forever chemicals which can increase the carbon footprint. So my question is how do you get around that? Thank you,

Speaker 3 (01:38:14):

Josh. Thank you for your comment. I would address it

Speaker 2 (01:38:17):

In brief is that the destruction of PFAS does not create carbon dioxide other than in a sense that as you mentioned, the incomplete destruction, which we do not believe is going to occur because of how we operate. We burn natural gas that creates the heat that then breaks the carbon flooring bonds and destroys the PFAS. So you can say that our facility has a carbon footprint, yes, because we burn natural gas to destroy contaminants. But the part about addressing, if I understood it correctly, how PFAS and carbon footprint are related is not how we understand it. So

Speaker 5 (01:39:12):

Next good question to further the question which was in relation to products of incomplete combustion associated with PFAS, we intend to run current EPA methodology for the identification of those products, which is utilizing OTM 50 and OTM 55 in addition to OTM 45, which is specific for PFAS compounds.

Speaker 2 (01:39:42):

Thank you, Rob. Great moderator. Next commenter please.

Speaker 1 (01:39:49):

The next question or comment comes from Jan Osco, Fort Edward, New York. Please go ahead.

Speaker 35 (01:39:56):

Hi, I have a couple questions. My first comment is that it's for Edward, not for Edwards. I mean that tells us right there how little you know or care about this community. Secondly, several people have asked what are the benefits for Edward? You have said several times how everybody else in New York state is going to benefit but not for Edward. I want to know how for Edward's going to benefit. Thirdly, you stated earlier that you don't need approval from the village of Ford Edward to conduct this two week study. We all know that if this trial is successful, you have every intention of trying to permanently implement this process in Fort Edward. So my question is, do you need approval from the village to permanently implement this process? And if not, why as this process wasn't being conducted when the company was originally approved for business in Fort Edward.

Speaker 2 (01:41:07):

Thank you Jan for your questions. A lengthy one. I think the most important part to address is the last part dealing with the Fort Edward community and requiring a permit from the village to our extent, our knowledge at the moment, we do not believe so, but maybe we are correct there and certainly we will have discussions if we decide to move forward with any permanent operation there. Of course, that will depend on the tasks and engagement with the state DEC, but if we decide to move forward, we will certainly have communications with otherwise work with the village to ensure that we are in compliance with any permit requirements that they might have. Thank you again. If moderator next commenter please.

Speaker 1 (01:41:59):

Next questionnaire comes from Angela Presley for Edward New York.

Speaker 36 (01:42:05):

Hello. I'd like confirmation that you can hear me please? Yes

Speaker 7 (01:42:08):

You can. Yes.

Speaker 36 (01:42:11):

Okay, thank you. I have one question for Rob and one question for guests. Before I get to those questions, I have one comment which is that if I were to give feedback on the format of this meeting, I would echo what a lot of other people have said. This has not been a great experience. Also, your answers have been unclear. You've been self-referencing a lot. The reason we're asking these clarifying questions is because your material is not clear. So we don't want to just hear you say, please read the report. We've read the report and that's why we have these questions. Okay. I'm going to start with the question for Jeff. So this is from kind of a central business model question. I heard you describe the business model briefly and talk about your profit from the sales of the soil, but I would also like to know how much of your business model relies on the income from the service of cleaning the soil as well as the sales of the soil.

(01:43:08):

I just need to understand what that looks like. And on your website multiple times we talk about over 30 years of PFOS experience with cleaner. So I'd like you to describe that experience please. And for Rob, I have questions about the employees. I feel like this is a group that has been ignored As far as the stakeholders in any of your planning or in your protocol, I would like to know how many employees are at the Fort Edwards facility and can you describe their training to handle these types of materials? What are the demographics of those employees? You don't have to go through all of this now, but like the responses in writing later and are these vulnerable folks who are going to have trouble with the healthcare costs if there are effects down the line? And then one quick quantitative response that you can give me is if there is a spill on your facility, how fast would a response team get to that still? And I'd like that answer in

Speaker 8 (01:44:12):

Minutes please. Thank you.

Speaker 3 (01:44:17):

Angela, thank you very much. I think a number of questions and

Speaker 2 (01:44:20):

I think your point was well made that there are some of those questions that we don't have immediate answers to and we will certainly record your comments and respond to those. The last question though, which was about a spill on the facility, so a release of a solid on the facility, how quickly would that be cleaned up?

Speaker 5 (01:44:42):

Personnel are on facility when the unit is operating on a 24 hour basis. If there is a noted spill of material, the material is cleaned, I would say in a very

Speaker 2 (01:45:00):

Short term appropriate period of time. So identified and they begin the process of picking it up and putting it back in the right spot. Correct immediately as many respects begins the response. Thank you very much. Alright, moderator next commenter please.

Speaker 1 (01:45:21):

Next question of comment comes from Ailey Pruitt, Fort Edward, New York.

Speaker 7 (01:45:28):

Hello, go ahead. Hello,

Speaker 37 (01:45:29):

Can you

Speaker 1 (01:45:29):

Hear me? Yes you can.

Speaker 37 (01:45:32):

Okay. As a student, a freshman student at Fort Edward High School, I would just like to know, since Fort Edward high school is less than a mile away, how will you ensure that students are not being subjected to PFAS contamination and will monitors be at school? And if also would you feel comfortable bringing your own kids to this school since it's less than a mile away with or without monitors? Thank

Speaker 3 (01:46:06):

You.

Speaker 2 (01:46:06):

Alright, thank you Al. Thank you Allie. I think that the question really focused on admissions. How do we know that we don't have any or that they're below standards? We've explained that a number of times. We appreciate the question every time though we have monitoring systems that collect samples and then the analysis as we described, O TM 45, 50 and 55 are all run to ensure that the emissions are below

standards as well as for things like hydrogen fluoride and other potential pollutants. With respect to monitors at any location offsite of the facility, there's no intention to do that.

Speaker 5 (01:46:52):

The comment

Speaker 3 (01:46:53):

We could add in relation to offsite locations and emissions,

Speaker 5 (01:47:04):

Again, can be viewed and referenced in the permit application itself. The modeling runs which do depict the local community and emission potentials is part of the permit application. That information is available on the website. Thank you, Rob.

Speaker 3 (01:47:29):

Next commenter please.

Speaker 1 (01:47:32):

Next question comes from Deshaun Brown. Hudson Falls New York.

Speaker 14 (01:47:38):

Did you do your research on Fort Edward and Hudson Falls cancer map? Because if you did, you wouldn't be burning the dangerous cancer

Speaker 8 (01:47:47):

Causing chemicals into the air.

Speaker 3 (01:47:56):

Thank you for that comment.

Speaker 2 (01:48:00):

Next commenter please.

Speaker 1 (01:48:03):

The next question or comment comes from Griffin Borang. Hudson Falls New York, please go ahead.

Speaker 3 (01:48:10):

Hello,

Speaker 38 (01:48:14):

Can you hear me?

Speaker 7 (01:48:16):

Yes, Griffin? Yes, please go ahead.

Speaker 38 (01:48:18):

Okay. I was just wondering what is the concentration of PFAS in the 5,000 tons of dirt that you're testing and by saying that it's 99.9%, all that burns then that 0.1% introduced into the environment where may not be already.

Speaker 2 (01:48:48):

Alright Griffin, I think the last part of your question was a little unclear, but we can certainly address the first part.

Speaker 7 (01:48:55):

Rob,

Speaker 5 (01:48:57):

In relation to soil PFAS concentrations in the soil, that would be part of the RD and D project. As we've noted a few times this evening, those soils have not yet been identified. To recap the discussion, they have not been identified for two primary purposes. One, we do not have a present permit to accept and to be able to treat soil with known PFOS concentrations. And in part of that reason and not knowing whether or not the RDD permit would be granted by the state of New York, we therefore cannot go out and try to identify soils that would be used in the itself.

Speaker 2 (01:49:49):

Thank you. Thank you Rob. Alright, next commenter please.

Speaker 1 (01:49:55):

Next question comes from Kyle cousin Port Edward, New York. Please go ahead, Kyle.

Speaker 39 (01:50:01):

Hello? Hello. Can you hear me?

Speaker 1 (01:50:04):

Yes.

Speaker 39 (01:50:06):

Okay. So I would like to reiterate that this should definitely be an in-person meeting. I've been trying to get on this call for a while now and having difficulty with it. But there's a question that's been asked as part of multiple questions and you're clearly avoiding directly answering this. So I'm going to ask it as my only question and that is, what is the, if any, direct benefit from this process to the community of Fort Edward? You keep talking about New York state and groundwater and the United States, but that can be studied anywhere else. What does the studying of this in Fort Edward, how does that benefit us here in Fort Edward?

Speaker 3 (01:50:53):

Kyle, thank you for that question. I think we've been clear on what

Speaker 2 (01:50:57):

We believe the benefits are and we'll let those stand for now. But we will also address these questions at a later

Speaker 3 (01:51:04):

Date. Provide answers at a later date. Alright, moderator, additional commenters?

Speaker 1 (01:51:16):

Yes. Our last question seems to be from Joanne Rio for Edward New York. Joanne, please mute your webcast.

Speaker 40 (01:51:26):

I did, yes.

Speaker 1 (01:51:28):

Okay.

Speaker 40 (01:51:30):

A lot of different things that I had thought of have already been talked about. I do agree with many of the other people that we need a in-person meeting. I like to see graphs and charts and a lot of people were cut off because of the phone service. The benefit of Fort Edward, I didn't hear anything about a benefit for Fort Edward. That was very vague. But another thing, my question is when you get your permit to start doing this, if the people in this community are totally against it from which it sounds like to me, are you still going to go ahead with it if we don't want it?

Speaker 3 (01:52:30):

Hello? Yes. Thank you Joanne

Speaker 2 (01:52:36):

For the comment. As we've noted before earlier, we're in the very preliminary stages of this approach. We are still just applying for a research permit where we've submitted the application. We will have to wait until after if we receive that permit to do the short term testing. We'll have to rate for those results and the assessment by the EEC before we can comment on any other future decisions or operations with regard to pfas at the Fort Edward facility.

Speaker 3 (01:53:11):

So thank you very much for your comment. Moderator anymore,

Speaker 1 (01:53:21):

There are no more commenters in the queue.

Speaker 3 (01:53:26):

All right.

Speaker 1 (01:53:40):

Someone else is just under the queue. Would you like to go ahead and take them or would you like to conclude as we're getting very close to the end of our time?

Speaker 2 (01:53:47):

Yeah, just a moment. We'll take that last commenter and if there's anybody else on the phone that has not yet commented, please remember to press star one so that you can get into the queue. Otherwise, we'll take this comment and then we'll move forward with my concluding remarks. So please moderate our next commenter.

Speaker 1 (01:54:09):

Next comment comes from JD Ock for Edward New York.

Speaker 41 (01:54:13):

Hi. So I was in the queue. I spoke with someone directly in the beginning and I quickly pressed star one again at the very end. It kind of seems like a game that you're playing because I'm on the phone with four other people who coincidentally also left a lot of comments in the text in the beginning and none of us have been selected for a phone call up until now. I just want to note that some of your responses have been extremely vague. For example, it's alarming that you cannot provide specific citations from your own proposal, especially those related to the most basic and easily anticipated questions. Further, this allows for no follow-up questions from us, no clarifying questions and no fact checking. And lastly, I do have a question. Earlier you stated that there were no identifiable releases and that begs the question of how many unidentified releases there have been and how good your monitoring actually is since no third party monitoring is involved in the current or the proposed process. Thank you.

Speaker 3 (01:55:27):

In relation to the

Speaker 5 (01:55:29):

Third party monitoring, which was noted in particular to this permit submittal admissions testing would be completed by a third party, which is not ESMI or Clean Earth. The samples collected from emissions monitoring will be analyzed by a certified laboratory, which is also third party and not owned or operated by clean Earth Soil analysis in addition, is also run by a certified laboratory, which is a third party and not owned and operated by clean earth. So analytical methods that are associated with the process currently and in association with the research permit submittal would be collected and analyzed by a third party

Speaker 3 (01:56:37):

Laboratory

Speaker 5 (01:56:38):

Certified.

Speaker 2 (01:56:41):

Alright, thank you Rob. It looks like we've got a few more folks have signed on. Moderator, can we continue to move forward?

Speaker 1 (01:56:48):

Absolutely. The next question comes from Carter Baros for Edward New York. Carter, please

Speaker 3 (01:56:56):

Go ahead with your question. Okay. Perhaps you're muted.

Speaker 8 (01:57:11):

Can you hear me now we can.

Speaker 3 (01:57:14):

Yep.

Speaker 21 (01:57:15):

Please meet your webcast though. Can combine the P FFAs criteria and r and d soil. Why would the soil be treated again if the first round treatment didn't remove the PFAS? Are you testing all 11,000 PFAS

Speaker 8 (01:57:27):

That could exist in the soil?

Speaker 2 (01:57:33):

Alright, Carter, thank you. That seemed like a two part question. And the first part is about retesting or retreating soil. Our protocols call out that if we have cleaned or processed and cleaned soil, we must test it. And if it does not meet the reuse conditions that the state has as far as its standards, then we retre it. Again, I don't have any numbers on that, but that almost rarely happens. But that is our protocol and the intent with messaging that to you is to make sure you understand that we do test it and then if it doesn't meet the standards, we're not going to release it. The last question had to do with the numerous PFAS that have been identified by chemists but are not necessarily found in the environment or in the contaminated soil that you might find in the state of New York or someplace around the United States. The state of New York, as well as the federal EPA change that the federal EPA has developed a number of analytical laboratory methods that tests for the most important and most likely PAS that you will find in the environment and that's the ones that we're going to test for.

Speaker 5 (01:59:02):

Good question. Thank you Carlos. I would simply add that the method 1633 is the best current available technology for identifying PFAS in solids. That is the methodology which we have proposed in the project.

Speaker 2 (01:59:20):

Good addition there Rob. Alright, next commenter please.

Speaker 1 (01:59:25):

The next question comes from Shannon Curley. Glen Falls New York.

Speaker 42 (01:59:29):

Hi, this is Janet Curley. So I have a comment and a question. The comment is that the phone format is okay as a second option for people who are unable to attend in person, but I find it disrespectful to have this as the only option for answering questions about the potential handling of forever chemicals in our community, especially given the history here with increased cancer rates. The question that I have is I was surprised that the PFAS are classified as non-hazardous waste. Two PFAS are in fact classified as hazardous substances. So how do you know that the soil that you are taking in does not contain those hazardous substances?

Speaker 3 (02:00:32):

To

Speaker 5 (02:00:32):

Provide a little clarity on regulation, because a material is classified as a hazardous material does not classify it as a hazardous waste. There's a couple sets of regulations that are in reference that do not directly tie together. So a hazardous materials classification does not correlate directly to a hazardous waste determination in relation to the research project. Concentrations of POA and P OS will be identified in the soil using EPA methodology 1633, which is the analytical method for demonstrating or determining if there are those PFOS compounds in solids.

Speaker 2 (02:01:20):

Alright, thank you. That's an important clarification there on the difference between hazardous materials, hazardous substances and hazardous waste. It's two different regulatory schemes in this case, PFOA and PFOS are not identified or not regulated as a hazardous waste. All right, moderator, next commenter please.

Speaker 1 (02:01:43):

Next is Ron Addison, Fort Edward, New York. Ron, please go ahead.

Speaker 43 (02:01:50):

Yes, I too would like to object to this format and an in-person meeting should have been held. I also am seeing that 5,000 tons I take it is supposed to be processed within around a two week

Speaker 3 (02:02:08):

Period. Now during that process

Speaker 43 (02:02:18):

When there's the completion of it, after it's been processed, the results of it's being processed will that third party I guess has been clarified will be, it won't be done by the EPA or DEC, just a third party laboratory test it. I guess just clarify yes or no to that. I got the question here. In this processing they're going to review and determine whether or not the 30 or whatever the most toxic parts of PFAS could

potentially be eliminated. You seem very optimistic on your eradicating the PFAS to the level levels that are acceptable and if they are would be okay I guess. But if they aren't and you're a first or a second attempt at breaking that down, what would be done if you say you sell the soil that's been brought to proper levels or if you are unable to do that in the event, if you can't do that to bring it to the levels that you optimistically seem to be think you able to do.

Speaker 1 (02:03:53):

Ron, can you

Speaker 43 (02:03:54):

I'm

Speaker 1 (02:03:55):

Sorry, what jump, I'm sorry. Can you wrap it up 30 seconds?

Speaker 43 (02:03:59):

Yes. Now what's going to be done with soil that can't be brought down to the proper levels and have any of these permits been requested in other states where you have these facilities and what are the results? Have you had a positive or a negative determinations in request to do the same process elsewhere?

Speaker 3 (02:04:31):

That's it, Ron. Thank you for that question.

Speaker 2 (02:04:38):

I'll answer the first part, which was asking about third party testing. D-E-C-E-P-A. As it was indicated earlier, we have third party sample companies that collect the samples and also third parties that analyze those samples for PFAS. Those are all third party certified companies that certified meaning that they're certified by the state and other entities to do these analysis and these sampling operations in the correct manner. So that is independent of the ESMI clean earth operations. Second question had to do with the soil and the contaminants in it and whether or not they get cleaned out and what you do if not, if we don't clean that, et

Speaker 5 (02:05:28):

Cetera. And I'll let Rob address that part. And before I address that question, Ron, I'm going to go back a little bit to your first part of the question too that David spoke to historical research projects completed by the facility and other emissions tests have been witnessed by D-E-C-D-E-C is not directly involved with the sampling or the analytical. They are involved in the approval processes associated with those methodologies and what's called a protocol for doing the testing. They approve those protocols and there is generally a witness from DEC who is onsite witnessing those events. The intent of obviously having witness there is to verify that we are in compliance or complying with the plans that have been put forward and approved by the state. Okay, good point. So just to go back and address that now in relation to the next question, which was

Speaker 2 (02:06:40):

The next question was about soil. The contaminated soil, we clean it up and what if it's not clean?

Speaker 5 (02:06:49):

Correct. So as was proposed in our submittal, if the facility is not successful in treating the soils to a determined soil concentration, those soils will be shipped to a permitted waste disposal facility capable of handling PFAS contaminated solids. The last question was in relation to permits that we may have approached or worked with or discussed in other states. Cleaner has been in discussion with other states in relation to permits for PFAS treatment for both solids and liquids treatments. We are in different various phases associated with that, but in relation to discussions only with other states with our thermal desorption technology.

Speaker 3 (02:08:13):

Got it.

Speaker 2 (02:08:14):

Thank you Rob. Thank you Ron. Yeah, thank you Ron for the question. Next commenter in the queue.

Speaker 1 (02:08:22):

Thank you. Once again, if you have not yet pressed star one to join the question queue, please do so. Now the next question comes from Kira Fullham, Hudson Falls, New York. Thank you. Please go Kira.

Speaker 44 (02:08:37):

Hi. So my question is how do you know you are not poisoning our air with all of what you're doing if you can't maintain it for long as you lose control of it? And my second question is why is the map grid view of the map so small that you can only see a little bit of our state and you

Speaker 8 (02:09:06):

Can't see the rest?

Speaker 3 (02:09:12):

Thank you Kira for this question. So

Speaker 2 (02:09:15):

Thank you Kira. Your first part of the question was how are we sure that our emissions are at the levels below the standards that the state requires? As we've explained a number of times here on the call but is in excruciating detail in our permit application, we have a number of test protocols and analytical methods that we will use to monitor the air emissions. With respect to the map

Speaker 5 (02:09:45):

Grid that you see, which I believe what you're referencing in the map grid is the modeling that is contained with the permit submittal. The modeling grid endpoints was determined through discussions with New York State DEC. So the endpoints or the end of the grid maps was decided and determined based on discussions with New York DEC prior to and in accordance with our permit submittals. So DEC asked us to

Speaker 2 (02:10:17):

Model it in that form. Good. Alright, points. Thank you Rob. Alright, moderator, next comment, sir.

Speaker 1 (02:10:28):

The next one is Millie Netter from Hudson Falls, New York. Millie,

Speaker 3 (02:10:33):

Please go ahead, Netter.

Speaker 8 (02:10:47):

Is there a test to determine whether a person has been affected by PCBs? If so, what are the steps being taken?

Speaker 3 (02:10:59):

Millie, it's a good question.

Speaker 2 (02:11:02):

Today's discussion is not on PCBs, so I'm not prepared to answer that. I would suggest that you call the New York State DEC or New York State Department of Health and they'll have an appropriate response to that question on PCBs and testing human beings. But it's a good question. Thank you. Next commenter please.

Speaker 1 (02:11:26):

The next commenter is Marie ew Monroe, New York.

Speaker 3 (02:11:33):

Hello, please go ahead Marie. Hello Marie. Marie, do you have us on mute?

Speaker 8 (02:11:58):

Can you hear me

Speaker 1 (02:11:59):

Now we can. Please go ahead.

Speaker 17 (02:12:02):

Okay. Thank you. I'm sorry about that. Will you be hauling soil that is contaminated with dangerous

Speaker 3 (02:12:10):

Heavy metals for this process and addition, I would like to know

Speaker 17 (02:12:26):

If you are taking in soil from military basis, will you let the public know before you begin and will there be a possibility that could have nuclear waste in it?

Speaker 3 (02:12:44):

Thank you. Radiation to metals that are accepted at the facility

Speaker 5 (02:12:55):

As was referenced a little bit earlier, we have a strict guidance as part of our profiling process for the analysis of metals that may be contained within soils that are received at the facility. I will note again that the facility is not permitted to accept hazardous waste, which some metals are and can be considered hazardous waste, but we are not permitted to receive those levels or concentrations of metals at the Fort Edward location In relation to the concern associated with Department of Defense locations, again in relation to our protocol and our protocols for profiling and acceptance, anything associated with which I believe was referenced as nuclear waste and I apologize if I did not get the termination correct. Again, those materials cannot and are not permitted to be accepted at the facility.

Speaker 2 (02:14:01):

Yes, no nuclear waste at the Fort Edward facility. Thank you Rob. Next comment or please

Speaker 1 (02:14:11):

The next question comes from Alison Donnelley, Hudson Falls. Hello Alison, please mute your webcast.

Speaker 45 (02:14:22):

My question is how are they testing the ammunitions coming out of the stacks? The emissions coming out of the specs.

Speaker 2 (02:14:32):

Got it. Rob, do you want to repeat one of your responses from earlier about air emissions?

Speaker 5 (02:14:38):

So in relation to air emissions at the facility associated with the research permits will be running various methods in relation to PFAS. Those methods are OTM, which stands for other test method 45 OTM 50 and O, TM 55, which are designed to identify PFO S compounds and products of incomplete destruction or combustion in relation to other materials that have been measured. Some of the other compounds that were mentioned earlier, which is HF hydrofluoric acid, we'll be running testing measures for that. Another compound which was identified this evening is CCF four that is also being tested for and is within protocol associated with admissions associated with this particular permit.

Speaker 2 (02:15:34):

Thank you Rob. Next commenter please.

Speaker 1 (02:15:39):

Next question or comment comes from McKenna Doyle Hudson 12, New York.

Speaker 46 (02:15:45):

Hi. Page 58 shows A-P-F-A-S plume over Hudson Falls and it's incomplete as it extends past

Speaker 8 (02:15:52):
The 1.5 mile radius.

Speaker 3 (02:15:59):
Can you repeat that question but a little bit slower please?

Speaker 46 (02:16:03):
Yeah, page 58 shows A-P-F-A-S plume over the Hudson falls and it's incomplete as it extends

Speaker 8 (02:16:10):
Past the 1.5 mile radius.

Speaker 3 (02:16:16):
So you're talking about, you said page 58

Speaker 2 (02:16:19):
And the plume modeling.

Speaker 28 (02:16:23):
Yes.

Speaker 2 (02:16:23):
And she's indicating you believe that it's incomplete. Alright Rob, do you want to address? Thank you.

Speaker 5 (02:16:32):
In relation to the modeling and the endpoints, determined modeling endpoints were determined based on discussions with New York State Department of Environmental Conservation. So the endpoints noted in the model were based on guidance we received from the state.

Speaker 2 (02:16:51):
Got it. Good point. Alright, next commenter please.

Speaker 1 (02:17:00):
Next question or comment comes from Jana Blair for Edward, New York.

Speaker 45 (02:17:06):
Good evening gentlemen. How do you know if a car is not going to crash into the trucks with the chemicals in it? And are you going to have the roads blocked off until notice, until the chemicals are in storage? Because I've been living in this town for 10 years and my grandma is at health risk right now and if she gets any disease or anything she can end up dying. So I am not trying to get her dead or have her dead and it's a risk if you bring chemicals around this town. So

Speaker 8 (02:17:48):

Thank you.

Speaker 3 (02:17:53):

Alright, thank you for

Speaker 2 (02:17:53):

That question. We work very hard with our contracted trucking companies to ensure that drive safely. They follow all DOT regulations. As we noted earlier, the trucks they use are sealed. Remember this is not chemicals as much as it's a lot of soil with a small amount of contamination in it and those trucks are inspected on a regular basis, they're covered, et cetera. So the likelihood of a car crashing into a truck and causing a spill is very

Speaker 5 (02:18:32):

Low. I would think the only perhaps comment would add, which David mentioned not soil, does not contain or is not the same as concentrated PFAS liquids. Right. There's David noted soil concentrations of P ffo S are generally low or are lately contaminated. They're not concentrated PFAS items. No liquids

Speaker 2 (02:19:02):

Involved as we've said many times. Correct. No liquids that are

Speaker 3 (02:19:04):

Involved. Got it. Alright, next comment please.

Speaker 1 (02:19:11):

Next question a comment on from Tanya Palsy for Edward New York.

Speaker 47 (02:19:17):

Hi, I have a few questions and I'll try to be quick. Can you hear me?

Speaker 5 (02:19:27):

Yes, we can.

Speaker 47 (02:19:27):

Can you hear me? Okay. Your business page states that you can treat soils, you can dispose of hazardous waste, you can dispose of electronics and pharmaceuticals. Will your project facility be limited permanently to only contaminated soils or will you be doing all these others eventually? That's my first question. My second question is, I know that projects of a certain size can bypass the local government and move right onto the federal level and not even have to worry about whether for Edward passes you on the permitting process. You can just bypass all of it if your project becomes large enough, has your project already become large enough and are you just going to bypass all the, for Edward people here and the Hudson Falls people and everybody's concerns. Will you just bypass everybody and go to the federal level? Because this sounds like a nationwide thing you're talking about.

(02:20:31):

Third question, where is all this contaminated soil coming from? Is it coming from anywhere and everywhere is other states or is this just, where is it coming from that you're hauling it in from? Is it coming from all over the nation? Nuclear, I mean, I don't know where it's coming from. Last question is, how will you compensate property and homeowners if property values drop significantly due to your project and people's fears about your project? And will you be compensating families that are affected if they end up with health issues? Do you have the funding to compensate people for all of that? So those are my questions,

Speaker 2 (02:21:22):

Tanya. Thank you. Four questions. The first one is you addressed our broader business that is Clean Earth. The current facility at in Fort Edward is a facility that handles contaminated soil. I cannot tell you what our future business plans are, but I can certainly tell you that the facility has been there for 20 plus years and all it's ever done in that time is handle contaminated soil and process to the state standards. Your question about federal versus local and bypassing local Fort Edward and other community concerns? No, we have no intention of bypassing the local community or permitting that might be required or any other state concerns. This is in part why we're having today's public hearing so we can gather input from the community and begin to address the concerns. The next question was about where is the soil coming from? As we've noted earlier, first of all with respect to this permit application to treat soil lightly contaminated with PFAS, we have not yet identified that soil and that's, and that's because we don't have permission to accept it yet. And so it would not make sense for us to go out and work with a potential customer to identify that. So our hands are tied until we get permission from the state. And finally, the last question was about compensation. I'm not prepared to have that discussion today and so we will let that one stand until a later date possibly. But thank you very much for your comments. Well understood and we appreciate them. Next moderator or next commenter please.

Speaker 1 (02:23:26):

Next question is from there, Gillis, whatever, New York.

Speaker 6 (02:23:30):

Hi Emily. Emily, I'm right here. I did have difficulty getting signed back in, but I am back in now. I'm there Gillis 24 East Road, Fort Edward, New York. What I'm hearing over the last two hours is that fear is a huge issue when young adults are asking about soil spills. It's being explained that this soil has small amounts of PFAS being transported and if they were small amounts of PFAS, I don't understand why they would have to be cleaned up. I am against this project. I'm here to voice the concerns. Due to the ESMI has been mandated to have this PPP because it needs a major permit process, not minor, as was explained to me by Rob Martin in a conversation we had. This is not a minor permit because of the risk inherent to the process of thermal DESORPTION of PFAS. Why are we bringing it into our community?

(02:24:32):

That's what you're hearing over and over for the last two hours. This site that you're proposing to test that at is a half a mile within our school playground and activity fields in Fort Edward. This is an experimental destruction of PFAS, A toxic chemical that is known to cause cancer in disrupt hormones in immune function. Why would you allow a chance of further contamination to our soil, water, and community? Our region inclusive of Hudson Falls, Southlands Falls, Glens Falls, and Fort Edward has been inundated by exposure from industrial contaminants. My 30 18 year career consisted of scanning cancer patients. I was a CT tech registered the state and federal licensure Coworkers consistently asked me, why do you know so many people? You know why? Because they were from Fort Edward and

Hudson Falls. I can imagine that even you need to see the fear in these parents' eyes when you talk about bringing more chemicals, more contamination to our community. That's why you're having to do A PPP. Do not interrupt me and take away Myam. Last 30 seconds.

Speaker 1 (02:25:56):

You've already passed your 30 seconds.

Speaker 6 (02:25:59):

I've already passed my two minutes.

Speaker 1 (02:26:01):

Yep.

Speaker 6 (02:26:03):

She said 30 seconds. You said 30 seconds. That's the problem with this. I was

Speaker 8 (02:26:07):

Trying to give you letter. It takes

Speaker 2 (02:26:11):

The next, excuse me just a minute. This is David. This is David Teresa moderator. Excuse this there. Our moderator has been instructed to limit people to two minutes, but I'll let you continue. So please, Theresa, please continue with your comments. Thank you.

Speaker 6 (02:26:28):

Thank you. So you are being mandated to do this because you are in close proximity to an environmental justice and permitting. That's called a CP 29 for ESMI and this RD and D permit that you exist also near the presence of a mapped DAC robbed, that's disadvantaged communities. We bear the burdens of negative public health effects, environmental pollution impacts, and we possess certain social economic criteria in these areas. You are also right on the border of a mapped PEJA, which is an environmental justice area. If you don't extend your circle past a mile and a half, you're not into it. If you take it out a little bit, you're right over the top of Hudson Falls, that enforces that. The idea that all people should have a right to live in a healthy community. The United States EPA has a mapping tool that combines environmental and social economic indicators to help protect these people. That's why they're all coming forward. You are being mandated to provide this PPP that has been difficult for everyone to work through for the last two and a half hours. And I'm done. Thank you, Rob. But you cut off 30 seconds ahead.

Speaker 3 (02:28:07):

You cut off 30 seconds. Sorry Teresa, did you finish?

Speaker 6 (02:28:18):

You want a public meeting? Thank you.

Speaker 2 (02:28:24):

Alright, thank you Theresa for those comments. Moderator, do we have any more commenters in the queue?

Speaker 1 (02:28:34):

Yes, I have Sarah Gillis, Hudson Falls, New York.

Speaker 48 (02:28:38):

Alright, thanks. My name is Shannon Gilli. I will answer all these questions for you because you're having a really hard time pulling up your references. Just so you know, every reference that you have in your permit are blocked for general citizens. You need to have a subscription to access those. So my first question is, will you send all of us the references that you have in your permit in A PDF format so that we can all read them in their entirety? New York State response on page two of their notification of incomplete application to the DEC said they didn't know why you were using a 99.9 to 99.99% efficacy. It says it in their permit. I read all of your permits and it has not been resolved. There has been no accepted rate by the DEC. They don't accept 99.9, but you continue to use it in your models.

(02:29:35):

You cite a paper 23 times for a burning of PFAS that happened already in Fort Edward and you weren't zoned for it. You took 22 tons of soil, you burnt it without anyone knowing, and that is a citation that you will probably receive. Why have you resolved that question by the DEC about the 99.9? Because none of your references say that when you finally did use method two to accurately model the 1.86 grams per centimeter cubed molecules, that will be coming out eventually. It states on page four that you can model a 3.1 mile radius. There's no mention in your permit that the DEC is limiting your monitoring parameters. And I will be foiling all of your email interactions to see if that conversation happened behind closed doors. There's multiple maps showing plumes over Hudson falls. And if you truly have our best interest in mind, you will extend that model to 3.1 miles as it states in method two parameters.

(02:30:46):

If you're saying that you aren't going to completely model the plume, you're just going to ignore it. What is the point of you being here? You're saying you're here for our safety and those numbers are crashing when it comes to Hudson Falls. If you can't verify that those are not below the standards of the New York state, you're lying to us extend 3.1 miles and show us that it's under the DEC standards. There is no reference to support your statement on page six that you believe PFAS can be completely thermally oxidized at temperatures. You're suggesting 982 Fahrenheit. That's 600 degrees Celsius. You need to process these at a thousand degrees and not a single reference in your permit states that these chemicals can be disintegrated at 600 degrees. You have 600 degrees as hot as you can get it and you're going to try it and you're going to see what happens.

(02:31:44):

Is that correct? That your facility can only reach 600 degrees Celsius for thermal oxidation? You also state in order to remove PPAs, it must boil. It must boil from the soil. PFAS boiling points are unknown in many cases. And you state in your permit that you believe that PFAS will evaporate from soil even if it doesn't reach a boiling point. My eighth graders know that that's a joke, especially when you have organic compounds in the soil that are going to bind those chemicals even stronger. You have no idea what that means when you say you believe this isn't a Christmas show. When you say you believe something is going to happen, and I have read every single reference in your paper, not a single one

states that you can boil PFAS at the temperatures you're suggesting not a single one states that you can thermally oxidize A-P-F-A-S at temperatures under 1000 degrees. And in your model you are using 99.99% on a load of PFAS soil that you brought in illegally. And it only had what? 54 parts per billion. It's a joke we your modeling soils that you brought in to that facility without the village's knowledge, you need to model these with an appropriate level of PFAS. You are citing studies that you did there that are only 70% effective. You cite your study 70% effective.

(02:33:36):

How are you going to resolve this when you share all of these references in PDF formats? And every one of these people can read everything that you're saying because none of your references say this. I have been reading them for a week, not one. So I hope everyone on this call understands that when they say, when you say, go read our references, they can't because we don't have access to them. And when we do, we are going to see how many times you avoided a question because the answer isn't there. You know that you are not going to get a thousand degrees Celsius. You know that you are not going to boil those PFAS at 350 degrees Celsius when there's organic matter in the soil. So if you could let everyone on this call when we're going to get all of these journals, let us know that the DEC got back to you somehow and told you that 99.9% was an appropriate model to use and what Hudson Falls people are going to do when you get us that 3.1 mile radius that your model method to is capable of.

Speaker 5 (02:34:57):

Thank you. Shannon, for the comments, I just want to verify a few items. I believe at the beginning of your statement, you referenced the fact that you could not utilize the links that were provided for the reference documents, and then I believe that you noted that you had read the reference documents. Could you just clarify, did you have access to them or not?

Speaker 48 (02:35:19):

Sure. Of course I have access through multiple universities. I work with Cornell, I work with Albany University as well, and I am a master teacher, so I have access to any reference site that I want to based on different logins and sign-ins that I can get through friends that I have in different universities.

Speaker 27 (02:35:46):

Okay, understood. We'll make sure that request

Speaker 48 (02:35:49):

Them and I can read them.

Speaker 5 (02:35:52):

Okay. We will make sure those links are live. We'll make sure that those links are live.

Speaker 48 (02:35:57):

No, you can't read them without paying for them. You can't live link, a primary source to a journal of chemistry. You have to make A PDF and you have to let us have the PDF.

Speaker 3 (02:36:13):

Thank you

Speaker 5 (02:36:14):

For that. I understand we are going to make sure that the documents are accessible by the public. Would like to address the comments about illegally accepting material into the Fort Edward location. That was work was concluded and occurred under an approved research demonstration permit issued by New York State Department of Environmental Conservation. So we were acting in accordance with the permit that was provided to us by New York State in relation to temperatures associated with the operation. I believe what you were referencing in relation to 600 degrees Celsius is a temperature associated with our primary treatment unit, which is the rotary kiln and not our thermal oxidizer, which does have the ability to reach temperatures, which you noted and temperatures which we had within the application. We'll make sure that those temperatures are noted and are available also for the public to review.

Speaker 2 (02:37:24):

Excellent. Rob, thank you for that response. Based on my engagement with moderator, we do not have any further people in the queue looking over the written comments. We've addressed those, but we will certainly review all those. Again, we will review all of the commentary that we received verbally today. As I noted earlier, we will make sure that we will respond to those comments in writing, compile 'em in such a way that they're summarized and respond and provide additional detail as necessary to make sure that our responses are clear and the folks that have been on the line get the knowledge they need. This concludes our event. I want to make sure that everybody knows where they can get further information. Once again, we've mentioned this a number of times, but if you can see here we have a documented repository, the webpage that we've talked about numerous times. You see the link there. We have the link at the bottom of the webcast. You can go there and view all these detailed materials. You can submit additional comments using that website and within the next couple of weeks we will, as I just noted, we will summarize, compile, and address all these questions in writing as well. We also have additional contact information there if you would like to express yourself in other ways. So once again, thank you very much. I appreciate your input today and thank you and goodnight.

Speaker 1 (02:39:00):

My office is now concluded. Thank you for attending today's presentation. You may now disconnect.