

City of Taunton

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May 18, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Mr. Alexander Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: Comments on DEIR Aries Taunton, LLC

EEA Number 16311

Dear Mr. Strysky:

The City of Taunton and its consultant, Tetra Tech, Inc. (Tetra Tech) reviewed the Aries Taunton, LLC (Aries) Draft Environmental Impact Report (DEIR) for the proposed biosolids gasification facility to be located in Taunton, Massachusetts. A detailed review was conducted to assess the DEIR's compliance with Massachusetts Environmental Protection Act (MEPA) statutory requirements and to assess the completeness of technical analyses related to environmental justice (EJ), air quality, and noise.

The attached report provides detailed comments and recommendations for consideration in the development of a Supplemental EIR and the final EIR. We recognize however, that certain of these comments, particularly those involving air quality modeling, might be more appropriately addressed during the air permitting process with MassDEP.

Following is a summary of key comments of particular concern to the City of Taunton.

1. One public outreach session has been held since issuance of the DEIR. The City requests that one or more additional meetings be held prior to issuance of the FEIR.
2. Additional technical analyses for the nearby EJ community are needed including a more comprehensive evaluation of air and water quality.

3. The comparable Aries facility in Linden, New Jersey, completed construction late last fall. The SEIR and FEIR should provide additional data on operations as well as on emissions and emissions control technologies, including odor, that have since become available for the New Jersey facility. These data are expected to be relevant to the performance of the Aries Taunton project.

4. The fate of PFAS through the production of dried biosolids and biochar (i.e., the dryers and gasifier) requires additional evaluation, including the relied upon test data for the Australian Loganholme facility and providing additional data to address the uncertainty in the assessment.

5. The PFAS and mercury risk assessment should include receptors nearest the proposed Facility.

The City of Taunton appreciates MEPA's efforts to ensure the environmental integrity of the proposed Project. Please let me know if you have any questions on the City's comments.

Sincerely,



Shaunna O'Connell
Mayor, City of Taunton



Phillip Duarte
President, Taunton Municipal Council