

**New York State Department of Environmental Conservation
Notice of Incomplete Application - This is NOT a Permit**



Application ID: 5-4144-00187/00001

Batch Number: 740906

Facility: Saratoga Biochar Solutions LLC
2-12 Electric Dr
Moreau, NY 12803

Contact: Raymond Apy *Owner ID:* 1810578
26 F Congress St # 346
Saratoga Springs, NY 12866

Permit(s) Applied for: 1 - Article 19 Air State Facility
1 - Article 27 Title 7 Solid Waste Management

Project Location: in MOREAU in SARATOGA COUNTY

Your application for Permit is incomplete. The following items are required:

Air State Facility items: Please provide the following information in support of your Air State Facility application:

1. Estimated manufacturer PFAS compound destruction efficiency for the thermal oxidizer.
2. AERMOD results for PFAS compounds using PFOA as a surrogate and aggregating for all compounds.
3. Estimate of incoming biosolids PFAS concentrations and an estimate of total PFAS compounds emissions from facility.
4. Overlay the final Disadvantaged Community (DAC) areas on the AERMOD maps, use the shapefiles available on DEC's website;
5. Revise the CLCPA analysis to include indirect emissions associated with truck traffic to and from the facility. Emission factors in EPA's GHG Emission Factors Hub (https://www.epa.gov/system/files/documents/2023-03/ghg_emission_factors_hub.pdf) can be used for this purpose.
6. Resubmit a revised CLCPA both Section 7(2) and 7(3) analyses for the entire facility as a single document/report that captures all of the changes/revisions requested and provided to DEC.
7. Resubmit a complete Air State Facility application incorporating all design changes.

Solid Waste Management items: Please provide the following information in support of your Solid Waste application:

1. Regarding your 4/4/22 response to DEC comment #2: Is additional storage necessary for incoming material? What if the facility goes down for a day and incoming biosolids cannot be processed that day?

2. Regarding your 4/4/22 response to DEC comment #3: Is additional storage necessary for finished product? Does this storage provide sufficient capacity in the event you're unable to move product?
3. In the BUD petition it states that during the startup period, manufactured product will be sent to a regional compost facility. What facility is this and are they authorized to accept this material?
4. In the BUD petition it states that 25% of biosolids in NY are going out of state. Please provide a source for this percentage.
5. For the guaranteed analysis/carbon fertilizer value in the BUD petition, please include test data or sources for this information.

For technical questions regarding these comments, please contact appropriate program staff as follows:

- Kevin Wood, Division of Materials Management, 518-623-1200, Kevin.Wood@dec.ny.gov
- Paul Sierzenga, Division of Air, 518-623-1200, Paul.Sierzenga@dec.ny.gov


cc: Julia Stuart, NYSDEC Air

Paul Sierzenga, NYSDEC Air
Andrew.Millspaugh@sterlingenvironmental.com
Aaron Love, NYSDEC OGC
Alanah Keddell-Tuckey, NYSDEC OEJ
Kevin Wood, NYSDEC Materials Management

Please submit requested information by June 02, 2023
No further action can be taken until all of these materials are received.

Contact Person:

ERIN L BURNS
NYSDEC
1115 NYS ROUTE 86
PO BOX 296
RAY BROOK, NY 12977
Telephone Number: (518) 897-1234

Signature: 

Date: May 02, 2023