

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 5

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July 27, 2023

Saratoga Biochar Solutions LLC
ATTN: Raymond Apy
26 F Congress Street, #346
Saratoga Springs, NY 12866

RE: Request for Additional Information
DEC #5-4144-00187/00001
Facility: Saratoga Biochar Solutions
Moreau (T), Saratoga County

Dear Mr. Apy:

This letter requests additional information required for the Department's CLCPA review and are required for application completeness. These technical comments were generated by our Air staff after further review of Saratoga Biochar Solutions analysis contained within its most recent Air application submission.

Please provide responses to the following technical comments generated in addition to the items contained within our June 14, 2023 Notice of Incomplete Application and our July 11, 2023 Request for Additional Information:

1. On April 14, 2022, a comment was emailed to the facility asking for potential mitigation methods for the GHG emissions to be considered. This comment was not fully addressed in the June 13, 2022, or the May 13, 2023 resubmission. Please discuss potential mitigation methods and whether they are feasible.
2. It is stated in the analysis that the syngas directed to the thermal oxidizer (destruction efficiency 99.5%) contains methane. However, the facility emissions summary states that there are 0 tpy of potential direct methane emissions. Please include the methane that is not destroyed by the thermal oxidizer in the facility's potential GHG emissions (Table R).
3. DEC recently asked for a discussion on the ultimate fate of PFAS compounds and assuming CF₄ would be created in the thermal oxidizer, please included the GHG implications (CF₄ = PFC-14, which has a GWP₂₀ of 4880 per Subpart 496.5) when discussing the ultimate fate of CF₄.



Department of
Environmental
Conservation

If you have questions regarding the technical items being requested in this letter, please contact Paul Sierzenga, Regional Air Engineer at Paul.Sierzenga@dec.ny.gov or 518-623-1200.

Sincerely,

A handwritten signature in black ink that reads "Erin L. Burns". The signature is written in a cursive style with a large, flowing "E" and "B".

Erin L. Burns
Regional Permit Administrator

ec: Paul Sierzenga, NYSDEC Air
Julia Stuart, NYSDEC Air
Aaron Love, NYSDEC OGC
Kevin Wood, NYSDEC DMM
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