

# Berkshire Regional Planning Commission Clearinghouse Review Report

September 5, 2007

**SUBJECT:** Mt. Greylock Historic Parkway Rehabilitation  
**EOEA#:** 12843  
**LOCATION:** Lanesborough, Adams, Cheshire, New Ashford, North Adams, Williamstown  
**ESTIMATED COST:** \$10 million (estimation taken from 2002 EENF)  
**REVIEW TYPE:** Notice of Project Change (NPC)  
**PROPONENT:** Dept. of Conservation and Recreation (DCR)  
**COMMENTS DUE:** September 11, 2007

## PROJECT DESCRIPTION:

The Mt. Greylock Historic Parkway Rehabilitation project is currently under construction. The project has gone through a thorough MEPA review, receiving a MEPA Certificate in 2002 after the completion of an Expanded Environmental Notification Form. This certification placed several conditions on the project, including measures to protect rare plants and animals during and after construction.

The project received the most recent certificate in 2006 for its first NPC. The changes being proposed included the installation of a septic line and the burying of overhead utilities underneath the rehabilitated section of road between the Summit and the intersection of Rockwell and Notch roads.

The DCR has filed a second NPC, this time for the construction of a temporary portable asphalt batch plant below the Visitor Center within the Mt. Greylock State Reservation in Lanesborough. The portable batch plant will supply much of the asphalt being used in the reconstruction project. The asphalt being produced by the batch plant will be used exclusively within the Reservation; none of it will be exported for use on any other construction project. The facility will be located at an existing construction staging area and will not include additional clearing of wooded areas. The site is not located in or near rare species habitat. The portable batch plant is being proposed to reduce truck traffic (and its associated fuel consumption, air emissions and other impacts), and to help keep the project within the proposed timeline and budget. The batch plant is proposed to be used only during the 2008 construction season.

The construction of the portable batch plant requires an Air Quality Permit from the Department of Environmental Protection (DEP). The batch plant does not exceed any MEPA air pollution thresholds, but the DCR has requested that the batch plant proponent, Maxymillian, Inc., which is the contractor for the road reconstruction, evaluate the environmental impacts of the plant and submit a NPC with MEPA. DCR will not approve of the batch plant until the MEPA Certificate has been issued.

## CONSIDERATIONS AND POTENTIAL ISSUES:

### Air Emissions

Maxymillian, Inc is proposing to employ a new portable batch plant model, which has been determined to be a Best Available Control Technology, which is the appropriate technology for a

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facility of this type. The plant is expected run a total of 500 hours during the 2008 construction season and will burn approximately 196,000 gallons of ultra-low sulfur distillate oil per year.

According to the NPC, locating the batch plant at the site will save approximately 5,000 truck load deliveries, saving approximately 20,000 gallons of fuel. The NPC states that the fuel savings will greatly reduce greenhouse emissions and eliminate several thousands of pounds of air emissions along local roadways, including:

- 125 lbs of PM
- 4,900 lbs. of NO<sub>x</sub>
- 38,000 lbs of CO
- 1,230 lbs of THC

The plant requires the filing of a BWP AQ 02 permit to the DEP for a Non-major Comprehensive Plan approval, as it will emit more than 5 tons of pollutants per year. Maxymillian Inc., is currently installing the new batch plant at a private site in North Adams. During the next few months it will produce asphalt and monitor air emissions to determine if the plant performs as expected. This plant will be moved to the Lanesborough site next year if permitted to do so by DCR.

The NPC did not discuss the air pollutants that the portable batch plant would emit. Supplemental information provided by Maxymillian Inc. states that during the construction season of 2008 the plant is expected to emit:

- 1 ton per year (tpy) PM/PM<sub>10</sub>,
- 4.35 tpy NO<sub>x</sub>
- 4.17 tpy CO
- .04 tpy SO<sub>2</sub>
- 2.48 tpy VOC
- .35 tpy HAP

The construction of the portable batch plant at the Mt. Greylock State Reservation will reduce the total amount of air pollution generated by the road rehabilitation project. The plant will eliminate the need to truck new asphalt into the site. However, the air pollution associated with the recycling and production of asphalt will be transported from a permanent, industrial facility located in Pittsfield to the base of Mt. Greylock in Lanesborough.

According to the proponent and personnel at the Mass. DEP, the level of air pollution to be emitted by the facility is relatively low and it is temporary in nature. Air emissions will be monitored and documented by the proponent in accordance with DEP permit conditions.

### Consistency with Local & Regional Plans

Maxymillian, Inc. has discussed the proposed portable batch plant with the Lanesborough Select Board and Town Manager. The Select Board is supportive of the facility because it will reduce truck traffic and its associated impacts on local residents and the road system.

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Overall, BRPC supports the rehabilitation project, noting in its comments of Sept. 9, 2002:

*DEM [now DCR] is to be commended for their attempt to rehabilitate the road while also respecting and honoring the scenic, environmental and historic qualities of the area. The planning efforts are exemplary and will serve as model for similar projects involving scenic, historic and natural resources.*

### Alternatives

An alternative analysis was not directly provided in the NPC. According to statements made by Maxymillian, Inc. personnel, the batch plant will reduce truck traffic (and its associated air pollution impact) and it will significantly assist in keeping the project on schedule. If the batch plant is not constructed, the truck traffic and its associated air pollution savings will be eliminated, and the project will most likely not be completed on time.

The preferred site for the location of the portable batch plant is Jones' Nose, located at a higher elevation on Rockwell Road and nearer to the northern reaches of the construction site. However, due to the presence of rare species, the site below the Visitor Center was chosen as the nearest alternative. The proposed site is an open field and is already a construction staging area, limiting the need for further clearing or disturbance. Erosion controls are already employed on the site.

### **COMMENTS AND RECOMMENDATIONS:**

No new environmental threshold has been exceeded. The proponent has provided the supplemental information requested by BRPC staff, and has agreed to forward this information to everyone on the MEPA distribution list, including all five of the communities in which the Mt. Greylock State Reservation is located. The BRPC believes that the information provided in the NPC, along with the supplemental documentation provided by the proponent, sufficiently represents the environmental impacts of the portable batch plant and that no further MEPA review is required.

These comments were approved by the Berkshire Regional Planning Commission's Executive Committee at their meeting on September 5, 2007.