Saratoga Biochar Solutions LLC Site Plan Application Supplemental Submission: Facility Safety and Emergency Response Preparedness

May 31, 2022

During the Moreau Town Planning Board's site plan application review pertaining to the proposed Saratoga Biochar Solutions ("SBS") project, facility safety and emergency response was raised more than once as a topic of concern. To address this concern, Saratoga Biochar respectfully submits the following summary of interaction and planning with Saratoga County Emergency Response, and the South Glens Falls Fire Department.

On April 20, 2022, SBS met with Saratoga County's Director of Emergency Management Mr. Carl Zeilman, along with Saratoga County Fire Coordinator Ed Tremblay, South Glens Falls Fire Chief Peter Corlew, and Saratoga County Emergency Services Specialist Michael Stanley. A copy of Director Zeilman's post-meeting email confirming the meeting and its participants is included below for reference. The following provides a summary of this meeting.

- SBS executives Raymond Apy and Bryce Meeker, and their consultant Andrew Millspaugh of Sterling Environmental provided Mr. Zeilman, Mr. Tremblay, Mr. Stanley and Mr. Corlew with an overview of the proposed Saratoga Biochar Solutions project in the Moreau Industrial Park. Site plan and facility structure drawings were provided and discussed.
 - O SBS processing technology to be implemented at the facility was reviewed with particular attention given to fire and emergency response items of interest: rotary dryer, rotary kiln, thermal oxidizer, natural and synthesis gas energy usage, carbon storage capacity and location, dust and dust mitigation systems, liquid nitrogen fire emergency purge system, fire sprinkler system, sulfuric acid storage tank design and location, and the need and use of sulfuric acid in the air cleaning system, operating temperature ranges, heat pathways, and the areas and equipment within the facility with the greatest potential for fire emergency.
 - Facility property and building ingress/egress were reviewed.
 - o 24/7 staffing plans, facility operating hours, and days of operation were discussed.
 - A full-size set of conceptual site plan and facility drawings were provided and left with Mr. Zeilman for reference and future use.
- Fire Chief Corlew requested that two (2) yard fire hydrants be added to the site plan in the northwest and southwest portion of the site to provide a water source to the rear of the facility.
 - These hydrant locations have been added to (indicated on) site plan diagrams submitted as supplemental to the Moreau TPB June 6, 2022.
- Mr. Tremblay noted the requirement that a lock box or equivalent means of fulltime site and building emergency access be installed to provide emergency access to all areas of the facility 24/7/365. SBS submitted that it would comply with such requirement and further stated that the facility would be staffed by a minimum of two employees whenever in operation, and that the company had no current intention of installing security fence and gating.
 - A note indicating the facility access requirement has been added to the site plan diagrams submitted as supplemental to Moreau TPB June 6, 2022.
- Mr. Tremblay indicated that there is no local response team with "confined space" rescue capabilities, which would be necessary for an emergency involving someone in the receiving pit.

- This led to a discussion of receiving pit design, which includes a scalping grates and covers such that human entry is not possible unless opened for service. It was further discussed that access into the pits would only be for planned maintenance or inspections by qualified individuals approximately once per year with confined space training, appropriate equipment (rope and harness, PPE, ability to self-rescue, etc.).
- Notes pertaining to this part of the discussion shall be added to the facility emergency response plan.
- Mr. Tremblay and Mr. Corlew requested that SBS hold facility layout and operation familiarization sessions with first responders during facility construction and during initial startup operations and SBS agreed to fulfill this request.
 - Notes pertaining to this part of the discussion shall be added to the facility emergency response plan.
- The following was determined and agreed at the close of the meeting:
 - O Saratoga Biochar will continue to engage the Saratoga County Office of Emergency Response and the South Glens Falls Fire Department in all matters discussed on April 20th throughout the process of architectural detail planning, and facility construction.
 - O Upon completion of detailed facility architectural plans and process equipment engineering, and in conjunction with the manufacturers providing equipment for the facility, Saratoga Biochar committed to draft a detailed facility emergency response plan and to review same with Saratoga County Emergency Response and South Glens Falls Fire Department officials for their input and approval prior to system startup. This plan is to include any and all necessary emergency response training for employees, as well as familiarization sessions with local and county emergency responders.

Copy of post meeting confirmation mail from Carl Zeilman:

From: Carl Zeilman < CZeilman@saratogacountyny.gov>
Sent: Wednesday, April 20, 2022 1:55 PM
To: Raymond Apy <rapy@northeasternbiochar.com>
Cc: Ed Tremblay < ETremblay@saratogacountyny.gov>; Theodore T. Kusnierz < TKusnierz@saratogacountyny.gov>
Subject: Northeastern Bio Char Meeting Follow Up

Ray

Thank you for stopping in today with Bryce Meeker and Andrew Millspaugh to discuss the proposed North Eastern Bio Char project in the Town of Moreau. We appreciate you reaching out to us to discuss the proposed project, timeline, emergency preparedness and response. It was valuable to have South Glens Falls Fire Chief Pete Corlew and our County Fire Coordinator in attendance. We look forward to keeping the conversation going as you move through the process. Should you have additional questions, please do not hesitate to reach out to the office at: 518-885-2232.

Regards,

Carl

Carl P. Zellman, M.P.A.
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