

STERLING

Sterling Environmental Engineering, P.C.

June 6, 2022

Town of Moreau Planning Board
351 Reynolds Road
Moreau, New York 12828

via email: biclerk@townofmoreau.org

Subject: Saratoga Biochar Solutions, LLC
Site Plan Application – Stack Height
STERLING File #2020-20

Dear Planning Board,

Sterling Environmental Engineering, P.C. (STERLING) provides this summary describing the rationale for increasing the Facility stack height from 75 feet indicated in the original Site Plan to the currently represented height of 115 feet for the Saratoga Biochar Solutions, LLC (SBS) Facility.

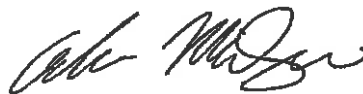
The original Site Plan selected a stack height of 75 feet to provide the lowest height that would achieve the applicable air standards for the first process line. The actual emissions would be verified through a stack test after commencing operation of the first process line with the expectation that actual emissions would be lower than estimated in the permit application to the New York State Department of Environmental Conservation (NYSDEC). The emissions assessment would be modified to confirm compliance with air standards for each subsequent process line prior to construction.

Following discussions with NYSDEC, SBS elected to revise the stack height to a height that meets applicable air standards for the full buildout of three process lines using current emission estimates included in the permit application. This provides a representation of the highest anticipated stack configuration for the Planning Board's consideration during Site Plan review. A stack test will still be performed following startup of the first process line to verify actual emissions. The Town of Moreau Code §149-5 excludes chimneys and necessary mechanical appurtenances that extend above the roof level from the definition of "Maximum Building Height"; therefore, no zoning variance is required for the increased stack height.

We look forward to continuing the Site Plan review with the Planning Board.

Very truly yours,

STERLING ENVIRONMENTAL ENGINEERING, P.C.



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