

AVA, NY LANDFILL TIMELINE

APPENDIX E – DANIEL GUTMAN – 1999

Jan 11, 1999, Letter to DEC Deputy Regulatory Permit Administrator Joseph Homburger, from Daniel Gutman (B.S., M.S. in Physics) - Comments on air quality analysis in the Final Environmental Impact Statement:

Concentration estimates for hazardous air pollutants and for particulate matter contained in the FEIS is based on questionable meteorological data, an inadequate receptor grid, incorrect emissions data and low number of truck trips.

- 1) The use of meteorologic data in dispersion modeling from Rome Air Force Base rather than EPA data from Syracuse airport resulted in unusually high number of calms. In dispersion modeling, calm hours are discounted in a particular way. Overestimating the number of calm hours and then eliminating them, can underestimate pollutant concentrations. Modeling techniques other than Gaussian models may have to be used.
- 2) Air pollutant concentrations from an area source are highest at property boundaries. Most of the boundary is free of receptors and the modeling very likely ignored the locations of highest concentration.
- 3) FEIS ignored local soil characteristics instead using a national average data in estimating particulate emissions. Airborne particulates at landfills are largely in the form of soil particles. Soil at the site contains high percentage of silt, which becomes airborne very easily (see Gerraghty and Miller "Site Investigation Report"). The net result of this is actual soil generated particulate emissions could be as much as 5 times the amount calculated in FEIS and a clear violation of National Ambient Air Quality Standards.
- 4) Particulate emission from paved and unpaved roads is directly related to number of truck trips. FEIS should have assumed a maximum number of truck trips to determine particulate matter emission rates. DEIS assumed 100 truck trips on typical day, however leachate generation will range from 5 million-10 million gallons per year. Water trucks used to control dust generated were omitted from the calculations, as were particulate emissions from diesel engines.