



60 Crossways Park
Woodbury, New York 11797
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June 8, 2022

Richard Onorati, II, Chairperson
80 Ridgebury Hill Road
Slate Hill, NY 10973
(845) 355-5700

Subject: Comments to the Dolsontown Corridor Development GEIS

Dear Mr. Onorati:

The City of Middletown and its consultant are in the process of reviewing the DGEIS for the above referenced project. The City of Middletown is going on record as opposing this project and our initial comments are provided below. Additional comments will be forth coming.

1. Will the proposed roadway of Dolsontown Road Right of Way widening include improvements to increase the weigh bearing capacity of the existing lanes, between 17M and McVeigh Road? Dolsontown Road is posted for 6-ton vehicles while transfer vehicles typically are filled to 20-tons.
2. Table 1 on page 417 shows 20 total truck trips in the AM peak hour and 15 in the PM peak hour. What is the total number of trucks per day entering and exiting the site? How many trips will be generated by the Transfer Station and how many by the Truck Maintenance/Storage Facility?
3. Has there been consideration provided to the wastewater quality generated from the transfer station? Liquids that had been passed through municipal solid waste or washdown water are likely to have a wastewater quality different from ones typically generated from office buildings, residences and warehouses and may require additional treatment prior to discharge. The provided documents do not appear to indicate pretreatment and appears to indicate direct discharge into sanitary sewer. Please clarify all pretreatment requirements to discharge to the sanitary sewer system.
4. Please confirm the expected capacity of the transfer station. The traffic study by Chazen provided in Appendix E states "The transfer station is proposed to accept and process 950 tons per day (tpd) of MSW and C&D and also include a 4,000 square foot (SF) office



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building." This capacity is not directly conveyed in the DGEIS and should be noted but is not. Is the 950 tons per day an assumption or a statement of capacity?

5. Are the materials that the transfer station will be handling still undecided? The DGEIS states "municipal solid waste (MSW), construction and demolition debris (C&D), and industrial waste (IW) for disposal, sorting and packaging of Old Corrugated Containers (OCC), and simple floor sorting for hardfill, brush, clean wood, and picked metal from the C&D for further processing and recovery." Will this facility take in any type of waste as listed herein or is this a generic statement to provide flexibility in what may be accepted if this project were to move forward?
6. The transfer station discusses utilization of a residential drop off facility and it does not appear that a capacity is provided for such facility.
7. The Marangi Solid Waste Facility's drawings does not appear to provide vehicle queuing may cause backups to the main road, particularly because vehicles will need to wait to dump.
8. Has a truck turning radius evaluation been completed? There does not appear to be adequate turning radius into all the building proposed.
9. Has the expected waste throughput been projected based on the surrounding transfer stations?
10. "Warehousing, solid waste transfer systems, and truck maintenance facilities, all stated land uses in the DGEIS, are regulated under NYSDEC's multi-sector permit for stormwater discharges from industrial facilities. It is unclear if the specific requirements of this permit have been addressed by the DGEIS."

Very truly yours,

A handwritten signature in black ink, appearing to read "K. Kelly".

Keith F. Kelly, P.E.
Client Service Leader
CDM Smith NY Inc.