

**SOUTH HADLEY PLANNING BOARD VIRTUAL MEETING
MEETING MINUTES OF MARCH 14, 2022
As Approved**

Present: Brad Hutchison, Chair; Diane Mulvaney, Vice-Chair; Joanna Brown, Clerk; Nate Therien, Member; Michael Davis, Member; Michael Adelman, Associate Member; and Anne Capra, Director of Planning and Conservation

Chair Hutchison called the meeting to order at 6:30 PM and reviewed the virtual meeting protocols.

Agenda Item #1 --- Open Comment Period

No requests to speak during the open comment period were received.

Agenda Item #2 --- Minutes

Draft minutes of the February 28, 2022 regular meeting minutes were sent to the Board for review. All revisions were incorporated in the most recent draft sent to the Board.

Motion: Vice-Chair Mulvaney moved to approve the February 28, 2022 regular meeting minutes. Member Davis seconded the motion. Five (5) out of five (5) members voted in favor of the motion through roll call.

Agenda Item #3 --- Correspondences

The list of the correspondences were sent to the Board prior to the meeting.

Agenda Item #4 --- Public Hearing Continuance to consider Special Permit and Stormwater Management Permit applications filed by E-ink Corporation for demolition of an industrial building and redevelopment of the existing site at 7 Gaylord Street, Assessor's Map 18 Parcel 86

Chair Hutchison called the public hearing to order at 6:34 PM. (See public hearing minutes)

The regular meeting reconvened at 7:48 PM.

Agenda Item #5 --- Planning and Conservation Department Report on Planning Projects and Development Updates

Director Capra detailed the following items:

- *Future Public Hearing Dates* – The Planning Board was scheduled to hold a public hearing at their next meeting to consider the final draft of the Master Plan update. Hearings to consider endorsement of the Route 202/33 Corridor Study and revisions to the Stormwater Management Bylaw would happen within the upcoming months. The Board would prioritize hearings regarding items requiring Town Meeting action.

- *Housing Production Plan* – The Selectboard authorized use of ARPA (American Rescue Plan Act) funds to update the Town’s Housing Production Plan. Director Capra was in the process of issuing requests for proposals to identify a consultant to facilitate the update.
- *Future Meeting Dates* – The Board reviewed future meeting dates as follows:
 - March 28
 - April 11
 - April 25
 - May 9
 - May 23
 - June 13 (Member Therein may not be able to attend)
 - June 27
 - July 25
 - August 8
 - September 12
 - September 26

Agenda Item #6 --- Other New Business

There was no new business to discuss.

Agenda Item #7 --- Adjournment

Motion: Clerk Brown moved to adjourn the meeting. Member Therien seconded the motion. Five (5) out of five (5) members voted in favor of the motion through roll call.

The meeting adjourned at 8:17 PM.

Respectfully Submitted,

As Approved

Colleen Canning, Planning/Conservation Coordinator

Appendix

Document	Document Location
Meeting ‘Q&A’ Transcript	Attached

**SOUTH HADLEY PLANNING BOARD VIRTUAL PUBLIC HEARING
CONTINUANCE:**

Special Permit and Stormwater Management Permit applications filed by E-ink Corporation for demolition of existing industrial building and redevelopment of the existing site at 7 Gaylord Street, Assessor's Map 18 Parcel 86

**MEETING MINUTES OF MARCH 14, 2022
As Approved**

Present: Brad Hutchison, Chair; Diane Mulvaney, Vice-Chair; Joanna Brown, Clerk; Nate Therien, Member; Michael Davis, Member; Michael Adelman, Associate Member; Anne Capra, Director of Planning and Conservation

Chair Hutchison called the public hearing back to order at 6:34 PM.

The applicant and representatives present at the hearing were as follows: Rob Heumann, E-ink Corporation; Keith Jacobsen, E-ink Corporation; Rob Troccolo, IFDesign, LLC; and Rob Newton, BSC Group. The third party peer-review consultant, Jim Riordan of Weston & Sampson, was also present at the hearing.

Chair Hutchison overviewed the status of the hearings and application review. A peer-review had been performed to evaluate the proposed stormwater management plan and the application's conformity to the local zoning bylaw. The peer-reviewer would present their findings during the hearing. As the applicant had not yet responded to the peer-review in writing, it was anticipated that the hearing would be continued.

Jim Riordan, Weston & Sampson, presented a slideshow (attached) which detailed the findings within the peer-review. The stormwater management plan generally met the Massachusetts standards but some items needing clarification were noted within the review. Special Permitting was required due to the proposed chemicals associated with the project. The peer-review identified that additional labeling and details were needed on the application plan sets. Information was also needed regarding site screening, air quality, and traffic associated with a shared entrance drive.

Member Therien asked why no secondary containment was needed in the loading area. Jim Riordan stated that a secondary containment was not required due to the tight hose connection. However, he could research more information regarding the question.

Member Therien questioned who was responsible for review of the provided emergency plan as the peer-reviewed had a narrow review scope which did not include the emergency plan. Vice-Chair Mulavey and Associate Member Adelman both expressed a desire to see more information within the emergency plan. The Board could consider what further review was needed.

Clerk Brown wanted for the Board of Health to review the application. The Public Health Director had been given the revised application materials and would provide comments within the upcoming days. Clerk Brown indicated that she wanted the Board of Health to review the application as well as the department Director.

Member Davis questioned how traffic would be impacted as the site utilized a shared entrance drive and the redevelopment posed a reduction in impervious surface. The applicant would provide a full response in writing within their peer-review responses.

Chair Hutchison opened the hearing to public comment at 7:20 PM.

Peter McAvoy, Jewett Lane, submitted a question through the meeting's 'question & answer' function and spoke at the hearing. He also submitted a google form (attached) which indicated concern for the use of Toluene. Peter McAvoy deferred his comment period time to John Hazen who was a South Hadley resident and was knowledgeable about printing processing and associated chemicals.

John Hazen, Cedar Ridge, spoke at the hearing. He was the president and CEO of a regional paper company who self-imposed a ban on the use of Toluene due to its volatility and potential for air pollution.

Robert Please, Jewett Lane, spoke at the hearing. He advocated that a risk assessment be performed to evaluate impacts relating to potential tank leaks or creation of hazardous vapors. He also questioned if the Town had the time, money and expertise to monitor a project of this size.

Carol Constant, Morgan Street, spoke at the hearing. She reiterated the aforementioned comments regarding the Town's ability to monitor the project long term.

Charlie Sheehan, Hadley Village Road, expressed concern for the proposed projects and potential public health risks. He mentioned that an industrial error using similar chemicals caused an explosion at CAI Coating in Danvers in which many homes were damaged.

Additional comments submitted through the meeting's 'question and answer' function were read out loud. (attached)

Clerk Brown stated that the Town's Master Plan identified the need to consider climate resiliency. Any number of catastrophes could occur which could create hazardous conditions relative to E-Ink's proposed expansion.

Member Davis asked the applicant how chemicals were currently stored on site and what the operational impact would be if the proposed tank farm was eliminated from the application. The applicant stated that a small amount of Toluene was used in operations. Isopar-E was collected and disposed of by a hazardous waste contractor. The Isopar-E would be disposed of through the same process in the newly proposed facility. The proposed tank farm utilized a closed processing system which resulted in safer operations. Additionally, chemicals could be recycled and reused

in a way that was not currently possible. The tank farm would allow E-ink to synthesize their own chemical components rather than having them shipped in which would allow them to create enough material to supply their own demand.

The meeting needed to be continued to allow time for the applicant to respond to the peer-review comments in writing. The Board could also consider what additional review would be needed regarding the emergency plan and risk assessment.

Motion: Clerk Brown moved to continue the hearing until March 28, 2022 at 6:30 PM. Vice-Chair Mulvaney seconded the motion. Five **(5)** out of five **(5)** members voted in favor of the motion through roll call.

The regular meeting reconvened at 7:48 PM.

Respectfully Submitted,

As Approved

Colleen Canning, Planning/Conservation Coordinator

Document	Document Location
Meeting 'Q&A' Transcript	Attached
Peer-Review Presentation	Attached
Google Form – McAvoy	Attached

March 14, 2022 Planning Board Meeting 'Q&A' Transcript

# Question	Asker Name
<p>1 The Planning Board and the Town are at their highest oversight and determination of usage with regard to highly dangerous, volatile items which can jeopardize public health. Has anyone asked the petitioner whether Toluene and related chemicals necessary for its project? Peer organizations, such as Hazen Paper Company (according to a phone conersation with John Hazen President and CEO of Hazen Paper) determined 30 years ago that those chemical items were NOT essential and it will not use them in similar processing matters.</p>	Peter McAvoy
<p>2 I have a question for weston on sampson. Were they asked to provide a risk analysis or risk assessment</p>	Robert Pleasure
<p>3 Underscoring Carol Constant's good statements, let's not limit it to issuing a special permit. Let's include the possibility of a clear and unambiguous NO!</p>	Peter McAvoy
<p>4 Charlie Sheehan's statement about CAI mentioned 80+/- homes damaged, the homes were blown apart on the side of the explosion and surprisingly far from the plant. Please review the Yoiutube of the event.</p>	Peter McAvoy
<p>5 Here is the link to the explosion in Danvers: https://youtu.be/eYN9WivpQ6M</p>	Martha Terry
<p>6 I do not wish to speak. Just want to share this with you.</p>	Martha Terry
<p>7 Mr. Heumann makes a decent point re recycling, but why must it be done at that location? Is it essential that it be there to E-Ink. Its not essential to Carl and Desiree Scheinost who live adjacent to E-Ink?</p>	Peter McAvoy
<p>8 Isn't July 5 a raindate for Fireworks?</p>	lindalyoung

MEMORANDUM

TO: Anne Capra, AICP, Director
Planning & Conservation, South Hadley, MA
M. James Riordan, AICP, LEED AP, Team Leader

FROM: James Pearson, PE, Technical Leader
Daron Kurkjian, PE, Senior Project Manager

DATE: March 11, 2022

SUBJECT: E Ink Expansion: Special Permit Peer Review

Introduction

Weston & Sampson was requested by the Town of South Hadley (the Town) to provide a review of the Special Permit and Stormwater Permit application for the proposed expansion of the E Ink facility at 7 Gaylord Street in South Hadley. The project site is fully developed as an existing industrial facility with an existing building, curbs, paving and utilities. The applicant proposes to remove a portion of the existing building and construct a new building and covered loading dock. Construction is approximately within the same footprint as the existing building. Other site improvements are also proposed, including storage tanks, drainage improvements, utility relocation and paving/cub replacement.

This memorandum summarizes the results of our peer review. The peer review has been prepared pursuant to our February 18, 2022 contract with the Town. In general, materials that we reviewed to prepare this memorandum include those submitted with the Special Permit application as of February 14, 2022 as listed below:

- E Ink Corporation Facility Expansion, 7 Gaylord Street, South Hadley, Massachusetts, Application for Special Permit (Two Pages, No Author, January 5, 2022)
- E Ink Corporation Facility Expansion, 7 Gaylord Street, South Hadley, Massachusetts, Project Narrative (Two Pages, No Author, Revised February 9, 2022)
- E Ink Corporation Facility Expansion, 7 Gaylord Street, South Hadley, Massachusetts, Drawing Set (Nine Sheets, BSC Group, January 5, 2022, Revised February 2, 2022)
- E Ink Corporation Facility Expansion, 7 Gaylord Street, South Hadley, Massachusetts, Application for Stormwater Permit (Two Pages, No Author, January 5, 2022)

- E Ink Corporation Facility Expansion, South Hadley, Massachusetts, Stormwater Management Report (41 Pages, BSC Group, January 2022)
- E Ink Corporation Hazardous Waste/Material Contingency Plan for South Hadley 950-1028 REVE (34 Pages, Tony Vinciguerra, June 18, 2021)
- Summary of E Ink South Hadley – Flammable and Combustible Chemicals (One Page, No Author, January 31, 2022)
- Safety Data Sheets (SDS) provided as of February 14, 2022 (142 Pages, No Author, No Date)
- E Ink Pigment Functionalization Process Overview (One Page, E Ink, No Date)
- First and Second Floor Area Control Drawings (Two Pages, IF Design, No Date)
- Letter from Troccoli to Captain Houle with attachments regarding tank farm questions at the E Ink facilities (Nine Pages, February 4, 2022)
- Letter from Troccoli to Capra regarding Special Permit and NOI Application at the E Ink facilities, attachments listed but not included with letter (Seven Pages, February 4, 2022)
- E Ink Permits Required (Two Pages, No Author, February 4, 2022)

Per our contract with the Town, our peer review includes the following:

- Peer review of the Stormwater Report and Application for Stormwater Permit for compliance with Chapter 200 Stormwater Management (Town of South Hadley, MA Stormwater Management (ecode360.com)), paying particular attention to containment of the industrial chemicals and relationship to the storm sewer on site.
- Peer review of Stormwater Report for compliance with the Wetlands Protection Act and South Hadley Wetlands Bylaw Chapter 240 as submitted with the Notice of Intent.
- Peer review of project plans and supplemental materials related to the containment, handling, and transport of industrial chemicals. This review includes review of management practices from onsite delivery of virgin materials, spent materials, and any emissions (air quality) associated with these processes.
- Written peer review report with findings for #1-3 above, which addresses how the proposed project meets the Special Permit standards as outlined in the South Hadley Zoning Code 255-129 (ecode360.com).

Overview of the Proposed Facility Expansion

The applicant proposes to demolish an existing administrative building and replace it with an expansion to its chemical processing facility. Work outside of the building will include relocation of sewer and storm drain infrastructure within the footprint of the expansion, replacement of pavement and curb, installation of chemical storage tanks, a chemical delivery spill containment system, and stormwater quality structures.

The applicant proposes to install stormwater structures to improve stormwater management at the site. Proposed structures include deep-sump, hooded catch basins and proprietary hydrodynamic separator stormwater treatment units. The applicant has indicated that one of the units will be installed on the main storm drain line that collects runoff from an abutter.

Peer Review

This peer review is provided under the following general review topics:

- Stormwater Management
- Environmental Management

Our review provides a section for each area of concern. The sections are structured to include a listing of review standards, our findings for the review standard, and then additional review findings.

Stormwater

Review Findings for Stormwater

We reviewed the application materials as listed above. Below, we provide a review, standard by standard:

Section 200-20

We reviewed the applicant's stormwater management permit submission pursuant to requirements of Section 200-20 of the Town's Bylaws and find that it has been prepared in conformance with the requirements therein, except for certain items for which additional information has been requested as further described below.

Section 200-17, 200-18, and 200-19

We reviewed the applicant's submission pursuant to requirements of Section 200-17 to 200-19 of the Town's Bylaws and find that it to be prepared in conformance with the stormwater elements except as provided below:

1. *Section 200-17: To prevent the adverse impacts of stormwater runoff, the stormwater performance standards in this Article VI must be met at new development sites.*

To prevent the adverse impacts of stormwater runoff, the Town requires that new developments must adhere to Massachusetts Stormwater Management Standards. Section 200-18(A) of the Town's bylaws specifies this requirement. Our comments related to the Massachusetts Stormwater Management Standards our provided below, under our findings related to Section 200-18(A).

2. *Section 200-18 (A): Projects must meet the standards of the Massachusetts Stormwater Management Standards as promulgated by the Massachusetts DEP.*

The Massachusetts Stormwater Standards are established in Volume 3 of the Massachusetts Stormwater Handbook. There are 10 standards, which include:

- *Standard 1 - No new stormwater conveyances may discharge untreated stormwater to or cause erosion in wetlands or water of the Commonwealth*

Untreated stormwater is not being discharged to wetlands or waters of the Commonwealth. The applicant proposes to install stormwater quality management

BMPs which are expected to improve stormwater quality in comparison with existing conditions. Adequate riprap protection for a new outfall has been provided to prevent erosion to the receiving waterbody. This standard has been met.

- *Standard 2 - Peak Rate Attenuation*

The proposed development will result in less impervious area onsite than existing conditions. The applicant asserts that this fact, on its face and without computational analysis, is evidence that peak stormwater discharge rates will not increase. We concur with this assessment and believe that this standard has been met to the maximum extent practicable.

- *Standard 3 – Recharge*

The proposed development will result in less impervious area on site than existing conditions. The applicant asserts that there is, therefore, no loss to groundwater recharge because of this development, and that in fact the development will result in a slight increase in recharge. We concur with this assessment and believe that this standard has been met to the maximum extent practicable.

- *Standard 4 - Required Water Quality Volume.*

The applicant has provided calculations for water quality volume and equivalent water quality flow for purposes of sizing one of the stormwater-quality structures (CS-4 on the plans) that is being proposed. We offer the following comments related to these calculations and to conformance with this standard in general:

- The calculation for CS-4 appears to use 0.5 inches of rainfall depth for purposes of calculating water quality volume. This site appears to meet the definition of a land use with higher potential pollutant load under Standard 5; therefore, water quality volume should be calculated based on 1 inch of rainfall. We recommend that the applicant revise this calculation.
- No calculation was found for water quality volume/water quality flow for the proposed STC1200 structure. This structure appears to be handling a fairly sizable area including paved areas and rooftops. We recommend that the applicant provide a water quality volume/flow calculation to allow for sizing of this structure.
- The calculations claim a TSS removal rate of 77% for both the CS-4 and STC1200 stormwater treatment units. We recommend that the applicant provide backup neutral third-party testing information that supports this TSS removal rate.
- In both the calculations and the plans, reference is made to a “LeBaron Snout” product to be used on the catch basins. We recommend that the applicant update this reference as LeBaron is no longer in business.

- *Standard 5 - Land Uses with Higher Potential Pollutant Loads*

The applicant's statement in the stormwater report narrative under this standard is ambiguous. Based on our review we believe that the site is occupied by a land use with a higher potential pollutant load.

- *Standard 6: Standards concerning discharges within Zone II, Interim Wellhead protection areas of public water supplies, and stormwater discharges near or to any other critical areas*

The site does not appear to be within critical areas under this standard.

- *Standard 7: Computations demonstrating that peak rate attenuation, recharge, and water quality treatment is provided to maximum extent practicable for redevelopment projects.*

We agree that this project is correctly classified as a redevelopment project. As such, we believe that the project approach generally meets the standards to the maximum extent practicable, but the applicant should address the comments identified herein.

- *Standard 8: Development of an Erosion and Sediment Control Plan*

The applicant has shown erosion and sediment control measures on their plans and has included a comprehensive erosion and sediment control plan as part of their stormwater report. The measures proposed appear to be appropriate to address Standard 8; however, see our review of Standard 9 (below) regarding operation and maintenance of erosion and sediment control measures.

- *Standard 9: Operation and Maintenance*

The applicant has provided an operation and maintenance plan for stormwater best management practices. The narrative under this standard appears to primarily include language about construction-period measures that properly belongs under Standard 8. We recommend revising this accordingly and that the applicant revise the narrative to identify long-term operations and maintenance considerations that are more applicable to this standard.

- *Standard 10: Illicit Discharge Compliance Statement*

The applicant states that there are “no known illicit discharges to the stormwater drainage system, and no new ones are proposed.”

Low Impact Development

The Massachusetts Stormwater Handbook indicates that proponents of projects subject thereto must consider environmentally sensitive site design and low impact development (LID) techniques to manage stormwater.

The Massachusetts Stormwater Standards list specific credits for LID that the applicant may pursue for compliance in lieu of installing dedicated stormwater management BMPs. We understand that the applicant is not seeking LID credit. We find that the applicant has complied with standards 3 and 4 to the maximum extent practicable and is, therefore, not required to achieve LID credit standards.

3. *Section 200-18 (B): When the proposed discharge may have an impact upon a sensitive receptor, including streams, storm sewers, and/or combined sewers, the Planning Board may require an increase in these minimum requirements, based on existing stormwater system capacity and standards of other Town boards, including, but not limited to, the Board of Health and the Conservation Commission.*

To our knowledge, the Town has required no increase in the minimum standards. Stormwater quality treatment at the proposed development is to be primarily provided by stormwater quality structures. We find the selected best management practice to be appropriate for the proposed project. As noted above, additional information is requested to verify that the system is sized and designed in accordance with MassDEP standards.

Section 200-19

We reviewed the applicants Stormwater Management Permit submission pursuant to requirements of Section 200-19 of the Town's Bylaws and found it to be prepared in general conformance with the stormwater elements, provided that the applicant furnishes the information requested herein.

Special Permit Review

Review Standards for the Special Permit

Standards for special permits are included in the Town Bylaws § 255-129. These are reproduced below with comments:

A. Except in the case of a special permit for changing a nonconforming use or structure, which is governed by § 255-7B, the SPGA must make written findings on the following mandatory standards, requiring that a proposed use will:

(1) Comply with all applicable land use district, overlay district, and other specific requirements of this and other bylaws and regulations, and be consistent with the purpose and intent of this bylaw and of the land use district in which it is located.

The applicant's special permit modifies the existing manufacturing facility usage by the inclusion of a tank farm for chemical storage. The additional chemical storage and processes are presented in a "Pigment Functionalization Process Overview Diagram." We recommend clarification on the new tank farm and chemical loading/unloading area including:

- a) There are eight rectangular features shown adjacent and northeast to the proposed storage tanks that are not labelled. Please label these features to indicate their nature.
- b) Please provide more details of the secondary containment system around the tanks. At a minimum this should include the surface type, grading, berms and drains (if any).
- c) Secondary contaminant is present at the truck loading/unloading area. What will be the connection of hosing or pipes to the new tanks? If piped with a hose connection no secondary containment is required. Otherwise, please describe the secondary containment planned and provide sizing calculations.
- d) Note 9.a on Drawing Sheet C 3.0 states that hoses shall be taken inside the building to be drained, cleaned, and sealed for next use. Please indicate where the hoses will be drained too. What controls are in place for the cleaning processes for the hoses? Please clarify how rinsate water will be managed.
- e) In the event of a spill to the "Unloading Spill Containment Area," will the area be cleaned prior to opening the valve to the stormwater system to prevent residual chemicals from entering the stormwater system? How will wash water be handled if it is generated as part of the cleaning process?
- f) Text on the site plan C-3.0 notes "Tank Farm (see Arch. Plans)." Please provide the referenced architectural plans.
- g) Text within tank outlines is not legible on PDF, please provide legible labeling.
- h) We recommend that Sheet C-3.0 include an alternate plan view excluding the truck vehicle to show fixed structures only. It is unclear if the rectangular area outside the vehicle outline is a separate concrete/asphalt pad or other structure.

(2) Be suitable to the surrounding neighborhood and the "Land Use Area" in which it is located. Land Use Areas are identified and described in the section of South Hadley's Master Plan entitled "Land Use Area Vision Statements" (pages 1-10 through 1-19). In making this determination, the Planning Board shall take into consideration any guidance provided by the land use goals articulated in South Hadley's Master Plan, goals articulated in South Hadley's open space and recreation plan, and input from relevant boards, Town officials, and the public.

(3) Be compatible with existing uses and uses allowed by right in the neighborhood, Land Use Area, and zoning district.

(4) Be compatible with the existing character of the neighborhood and Land Use Area, and/or zoning district. "Character" shall be understood to include prevalent patterns of: site design; setbacks from property lines; amount and location of parking; amount, type, location and quality of open spaces and landscaped areas; amount, type, and location of impervious surfaces; distances and relationships between buildings; density of building(s) relative to land area; building massing; architectural style and detailing; materials; buffering from adjacent uses; traffic volume and timing; noise; odors; and light.

(5) Be suitable for the property on which it is proposed, considering the property's, scenic, cultural and historic significance, and its ability to be buffered or screened from neighboring properties and public roads.

Bylaw items 2 through 5 refer to zoning and land use. The applicant's narrative, dated February 9, 2022, notes that the tank farm will be screened and the building will include landscaping and a vegetative buffer. Plan C-3.0 indicates a limited area of loam and seed (i.e., grass). Architectural plans are requested to allow for review of the aesthetics of the proposed renovations. These will be compared to existing, large-scale manufacturing activities of the existing E Ink facility.

(6) Provide safe access for fire, police, and other emergency vehicles.

The applicant has engaged with the Town Fire Department. These files are included in the peer review and provide additional useful information on the nature of the proposed tank farm. We have no further comments on this issue currently.

(7) Provide adequate water, drainage and waste disposal systems without causing significant harm to any natural water system or overloading any public water, drainage, or sewer system, or any other municipal facility.

Please refer to the stormwater peer review comments related to stormwater handling. The February 4, 2022 letter from IFDesign addresses questions from the Town of South Hadley Planning board regarding the water-quality (i.e., stormwater) unit and coordination with the abutting property for an agreement and easement. The letter notes that E Ink and Fuel Services (an abutter) will coordinate to maintain a stormwater quality treatment unit. The applicant has indicated that "E Ink intends to memorialize the easement after discussions with the Planning Board and Conservation Commission." We recommend that a written agreement regarding any easements, operations, maintenance and management be ratified prior to permit approval.

We request the applicant provide details about the stormwater to be treated by this system and the type of stormwater quality unit for review and confirmation of bylaw compliance.

(8) Not cause significant traffic congestion, impair pedestrian or bicycle safety, or overload existing roads, sidewalks and trails, considering their current width, surfacing, and condition, and any improvements proposed to be made to them by the applicant.

This peer review did not include a review of traffic. The applicant has noted that, by providing a turn radius, the existing configuration includes trucks backing into the driveway to access the loading dock; the proposed new configuration notes that backing into to the driveway will no longer be required. That is, trucks will pull into the driveway of the applicant's shared driveway rather than needing to back-in from the street. We would note that the shared driveway

arrangement does present some risk as E Ink trucks, loaded with hazardous materials, will potentially be maneuvering in the same area with vehicles from the other facility. It is not clear how this risk will be managed.

(9) Not result in excessive air, water, noise, or light pollution, or create any other public or private nuisance.

The applicant has listed a closed loop system with minimal air exposure. We understand that the proposed project will require permit review for air quality. Since our review overlaps with air quality, we offer the following air related questions and comments:

- a) What vapor/emissions controls will be in place for the new tank farm? What are the components of this closed loop system?
- b) Please describe the emissions control system described in the applicant's Hazardous Waste Material Contingency Plan to include a Regenerative Thermal Oxidizer (RTO) and how vapors from the tank farm or other new processes will be routed to this RTO.
- c) Will air monitoring be performed and will air monitoring data shared with the Town as the system start-up begins? Based on wind direction, residential properties may be within 500 feet of the tank farm. The Hazardous Waste Materials Contingency Plan includes Oxygen and Lower Explosive Limit (LEL) monitors in interior spaces.
- d) Does the applicant plan to include vent ports for the 8,500-gallon precast concrete tank? If a limited release of toluene occurred how would this concrete tank be managed to both avoid vapor migration if venting is present or build-up of vapors.
- e) Has the applicant performed a Hazardous Building Materials Inventory (HBMI) of the Administrative Building to be demolished? The MassDEP will require under the AQ-06 Construction/Demolition Notification completion of hazardous material survey and abatement during partial demolition/renovation activities.
- f) Please specify any odor controls and air monitoring to be performed during toluene and pigment deliveries.
- g) Does the applicant propose an inspection plan and schedule for tanks storing hazardous wastes (310 CMR 30.686 and 310 CMR 30.696)?
- h) Does the applicant plan to submit a written assessment to MassDEP attesting that proposed tank system has sufficient structural integrity and is acceptable for the storing of hazardous wastes (310 CMR 30.693(1))?

- i) Does the applicant plan to perform tightness tests prior to putting the tanks into use (310 CMR 30.693(5))?

(10) Not degrade the scenic, rural, or historic character of the Town with structures or other lot features which are deemed visually objectionable in light of prevailing community as reflected in the goals articulated in South Hadley's Master Plan.

(11) Be consistent with the South Hadley Master Plan, provided that the Comprehensive Plan provides legally sufficient guidance and that the applicable provision of the Master Plan is not inconsistent with any specific provision of this bylaw.

(12) Comply with applicable criteria for site plans under § 255-148.

Bylaw items 10, 11 and 12 will require a set of architectural plans for review. The requested architectural plans will provide information needed to review the visual nature of proposed construction and review criteria of § 255-148.

Thank you for the opportunity to assist the Town of South Hadley with this review. If you should have questions related to this review, please contact me at (401) 497-6705 (mobile) or by email at riordanj@wseinc.com.

Eink Peer Review

March 14, 2022 Planning Board Hearing
Stormwater and Hazardous Materials



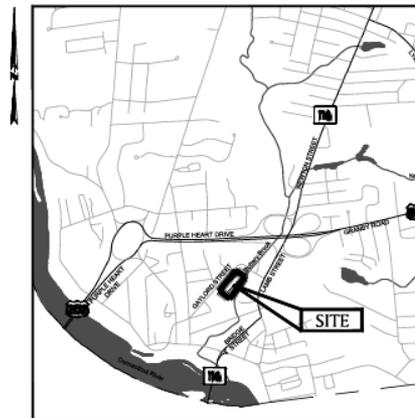
Overview of the Site

E INK CORPORATION FACILITY EXPANSION

7 GAYLORD STREET
SOUTH HADLEY, MASSACHUSETTS

JANUARY 5, 2022

REVISED FEBRUARY 2, 2022



SITE MAP

SCALE: 1"=1000'

FOR PERMIT ONLY

INDEX OF DRAWINGS

T-1.0	TITLE SHEET
EC-1.0	EXISTING CONDITIONS PLAN
C-1.0	OVERALL SITE IMPROVEMENTS PLAN
C-2.0	SITE PREPARATION PLAN
C-3.0	SITE IMPROVEMENTS PLAN
C-4.0-4.1	DETAILS
C-5.0	TURNING MOVEMENT PLAN
C-5.1	TURNING MOVEMENT DETAILS

PREPARED FOR:

Eink

E INK CORPORATION
7 GAYLORD STREET
SOUTH HADLEY, MA 01075

PREPARED BY:



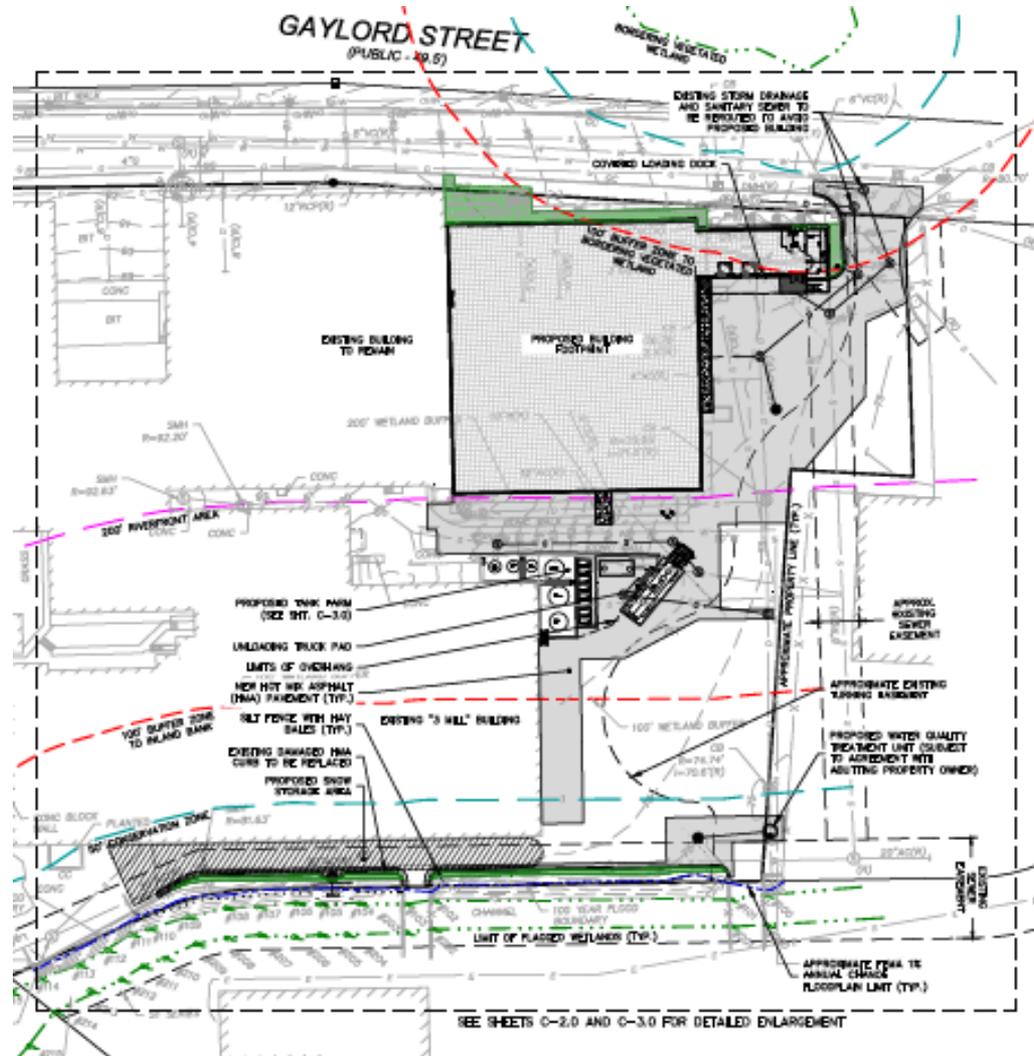
BSC GROUP

300 Brickstone Square
Andover, Massachusetts 01810
617.896.4300

JOB NO: 23301.01 DWG NO:

SHEET T-1.0

Overview of the Site



Materials Reviewed

- Application for Special Permit (January 5, 2022)
- Project Narrative (Revised February 9, 2022)
- Drawing Set (Revised February 2, 2022)
- Application for Stormwater Permit
- Stormwater Management Report
- E Ink Corporation Hazardous Waste/Material Contingency Plan
- Summary of E Ink South Hadley – Flammable and Combustible Chemicals

Materials Reviewed

- Safety Data Sheets (SDS)
- E Ink Pigment Functionalization Process Overview
- First and Second Floor Area Control Drawings
- Letter from Troccoli to Captain Houle
- Letter from Troccoli to Capra regarding Special Permit and NOI Application
- E Ink Permits Required

Stormwater

- Review Criteria
 - Section 200-20 Criteria
 - Section 200-17, 18, and 19 Performance Standards
 - Massachusetts Stormwater Standards

Stormwater

- 200-20 Safety
 - Prepared in conformance

Stormwater

- 200-17 to 200-19 Prevent Stormwater Impacts
 - Generally, meets Mass Standards 1 – 10
 - Exceptions noted in next slides for stnds 4, 5, 8, and 9.

Stormwater

- 200-17 to 200-19 Prevent Stormwater Impacts
 - Mass Standard 4 & 5
 - Should meet 1.0 inches WQV rather than 0.5 inches
 - Subject site is a LUHPPL
 - Provide STC 1200 quality and flow calculations
 - Third party testing for 77% TSS removal claim
 - Change LeBaron reference, out of business

Stormwater

- 200-17 to 200-19 Prevent Stormwater Impacts
 - Mass Standard 8 & 9
 - Construction O&M should be under Stnd 8
 - Provide long-term O&M for stormwater BMPs
 - If Fuel Services will be responsible, provide agreement

Stormwater

- 200-17 to 200-19 Prevent Stormwater Impacts
 - Mass Standard LID
 - Applicant is not seeking LID credits
 - Site is a LUHPPL. Proposal meets MEP stnd.

Special Permit Review

- Zoning Code 255-129

Special Permit Review

- Existing Facilities with Added Chemical Storage
 - Eight rectangular features on the site plan should be labeled.
 - Tanks should be clearly labeled.
 - Add detail for 2⁰ containment around tanks.
 - Provide a plan set without the truck.
 - How will the hoses be connected and managed?
 - How will the area be cleaned if a spill occurs?

Special Permit Review

- Screening from neighboring properties
 - Screening is indicated
 - Provide architectural plans to show screening

Special Permit Review

- Traffic—Shared Driveway
 - How will traffic in the shared driveway be managed during loading and offloading?

Special Permit Review

- Air Permitting
 - What's in the closed-loop system? How will vapors be managed?
 - Provide detail on air emission control from the tank farm and RTO
 - What air monitoring will be done and will data be provided to the Town?
 - Will the 8,500-gal tank be vented? How would a release be managed?
 - How will building materials from the demolished building be managed?

Special Permit Review

- Air Permitting
 - How will air be monitored and managed during toluene deliveries?
 - Inspection plan and schedule for the tanks?
 - Written, structural assessment of tank to MassDEP?
 - Tightness tests of tanks?

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thank you
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March 14, 2022 Planning Board Public Hearing Continuance - 7 Gaylord Street

This form is to allow for submission of written comments regarding the scheduled public hearing continuance to consider the Special Permit and Stormwater Management Permit applications filed by Eink for demolition of an industrial building and redevelopment on same site located at 7 Gaylord Street.

You can review the application here: <https://www.southhadley.org/1164/11004/Gaylord-Street-7---Redevelopment-2022?activeLiveTab=widgets>

Please note the Planning Board's Virtual Hearing Guidelines/Protocols - they also apply to participating in meetings - posted at <https://www.southhadley.org/1043/Virtual-Public-Hearing-Guidelines> *

Check an acknowledgement that this was noted

Please State Your First and Last Name *

Peter McAvoy

Please State Your Street Address including City/State *

20 Jewett Lane, South Hadley MA

Please state your email address - if any

peter@mcavoylaw.org

Do you wish to speak at the public hearing?

Yes

No

Please list the agenda items to which you wish to speak

E-Ink's request to store and process dangerous chemicals on property adjacent to residential neighborhoods and on watershed areas.

You can include written comments below

I am opposed to storage and processing of Toluene and related printer's chemicals because they are volatily flammable, subject to air quality damage through high vaporization and are known to be cancerous as airborne material and in liquid form. Toluene is also known to be a danger to aquifer's and aquatic life.

This form was created inside of southhadley.ma.gov.

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