

APPENDICES

Appendix JS-A

Best Management Practices for Control of Odors

Empire State Newsprint Projects
Besicorp-Empire Development Company, LLC
Best Management Practices for Control of Odors

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TABLE OF CONTENTS

1.0 Introduction	1
2.0 Potential Source of Odors.....	1
2.1 Raw Material Handling and Storage	1
2.2 Gray Water.....	1
2.3 Wastewater Treatment.....	1
2.4 Sludge Handling	2
3.0 Best Management Practices for Odor Control at Empire State Newsprint Project.....	2
3.1 Raw Material Handling and Storage	2
3.2 Gray Water.....	3
3.3 Wastewater Treatment.....	4
3.4 Sludge Handling	5
4.0 Odor Response	7

Exhibit A - FKC Screw Press and Rotary Screen Thickener Recycle Sludge Dewatering Applications (>40% recycle sludge content)

Exhibit B - Community Liaison Program - See section XIII of Appendix JS-I of the Joint Settlement Agreement

1.0 Introduction

The identification and control of odors associated with the Empire State Newsprint Project ("ESNP") recycled newsprint manufacturing plant ("RNMP") and cogeneration facility have been raised by several commenters on the Project's Article X Application/DEIS and Supplement. The purpose of this plan is to describe the concerns raised regarding the potential sources of odor associated with the operation of these facilities and the design features and operational best management practices that will be employed to avoid and/or mitigate these potential odors. This plan also provides a description of the "Community Outreach Process" that would be used to address any unexpected odor issues that may arise in the unlikely event of a process upset during operation.

2.0 Potential Source of Odors

Commenters have suggested that potential sources of odors associated with the RNMP could include raw material handling and storage; wastewater treatment; and sludge handling. In addition, the use of "gray water" for the cogeneration facility cooling tower makeup has been mentioned as a potential source of odor.

2.1 Raw Material Handling

In the RNMP, raw materials brought into the facility include bales of old newspapers ("ONP") and old magazines ("OMG") that will be transported in covered trucks or rail cars. If they were inadvertently exposed to the weather, once the bales were opened up, the exposed wet paper could release some odor associated with the previous decomposition of the paper.

2.2 Gray Water

The use of gray water from the Albany County Sewer District South Plant has been suggested as a source of odors. While wastewater treatment plants themselves are considered potential sources of odors, these sources are associated with the sludge generated from the process and potential hydrogen sulfide generation during anaerobic upset conditions, not with the treated effluent.

2.3 Wastewater Treatment

Wastewater treatment facilities have long been noted as potential sources of odorous compounds. Typically, odors are indicative of poor operation resulting

