

Dear Mr. Faiman and Wilton Zoning Board Members,

Some of the information in Dr. Laura Green's "questions and answers" that a representative for Quinn Properties LLC sent to the ZBA on 10/22 concerns us therefore we are providing additional information and supporting citations to supplement our 10/15/2019 letter.

Dr. Green's explanation that hot mix asphalt plants are not a "major source" of pollution seems to be an obfuscation. In the case of asphalt plants "minor" does not mean innocuous. Asphalt mixing has an industry code of 324121 and is covered by the EPA's Toxics Release Inventory (TRI) program.

"TRI is a publicly available database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities.( United States Department of Health and Human Services) .

<https://toxmap.nlm.nih.gov/toxmap/faq/2009/08/what-is-the-toxics-release-inventory-tri.html>

The TRI program requires facilities in certain industries which manufacture, process, or use significant amounts of toxic chemicals, to report annually on their releases of these chemicals. The reports contain information about the types and amounts of toxic chemicals that are released each year to the air, water, land and by underground injection, as well as information on the quantities of toxic chemicals sent to other facilities for further waste management." (United States Department of Health and Human Services).

According to the EPA website, "chemicals covered by the TRI program are those that cause

- Cancer or other chronic human health effects
- Significant adverse acute human health effects
- Significant adverse environmental effects

<https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory#What%20is%20the%20Toxics%20Release%20Inventory?>

For the EPA's TRI index program rules state that " 324 Petroleum & Coal Products "ALL six-digit industry codes are covered."

<https://www.epa.gov/toxics-release-inventory-tri-program/tri-covered-industry-sectors#Anchor%203>

Here is a link to the NAICS Codes and Titles:

<https://www.naics.com/six-digit-naics/?code=31-33>

Here are links to TRI reports for three New England asphalt plants:

Williston VT:

[https://iaspub.epa.gov/triexplorer/release\\_fac\\_profile?TRI=0549WPKNDS346AV&TRILIB=TRIQ1&FLD=&FLD=RELLBY&FLD=TSFDSP&OFFDISPD=&OTHDISPD=&ONDISPD=&OTHOFFD=&YEAR=2015](https://iaspub.epa.gov/triexplorer/release_fac_profile?TRI=0549WPKNDS346AV&TRILIB=TRIQ1&FLD=&FLD=RELLBY&FLD=TSFDSP&OFFDISPD=&OTHDISPD=&ONDISPD=&OTHOFFD=&YEAR=2015)

Wells ME:

[https://iaspub.epa.gov/triexplorer/release\\_fac\\_profile?TRI=0409WPKNDS81BYD&year=2012&trilib=TRIQ1&FLD=&FLD=&FLD=&OFFDISPD=&OTHDISPD=&ONDISPD=&OTHOFFD=](https://iaspub.epa.gov/triexplorer/release_fac_profile?TRI=0409WPKNDS81BYD&year=2012&trilib=TRIQ1&FLD=&FLD=&FLD=&OFFDISPD=&OTHDISPD=&ONDISPD=&OTHOFFD=)

Pike Hookset NH:

[https://iaspub.epa.gov/triexplorer/release\\_fac\\_profile?TRI=03106HKSTT38HAC&year=2012&trilib=TRIQ1&FLD=&FLD=&FLD=&OFFDISPD=&OTHDISPD=&ONDISPD=&OTHOFFD=](https://iaspub.epa.gov/triexplorer/release_fac_profile?TRI=03106HKSTT38HAC&year=2012&trilib=TRIQ1&FLD=&FLD=&FLD=&OFFDISPD=&OTHDISPD=&ONDISPD=&OTHOFFD=)

Dr. Green's assurances that fugitive emissions are "small *relative* to exhaust stack emissions" is hardly comforting and tells us little about either.

As for Dr. Green's response about "air dispersion models" and odors it would seem that these would be very site specific. Unless air dispersion, temperature inversions and wind patterns have been studied by an expert, in the valley that this plant would occupy, we have no way of knowing what effects this particular plant would have on our town's air quality or how odors would travel. Perhaps the applicant would fund such a study if the variance were granted?

In addition, what expertise or evidence does Dr. Green offer to support her claim that noise would not be detectable from beyond the property line or from Goss Park? We see nothing in her CV that indicates that she has any training in acoustics. We have recorded and measured the sound produced by a similar asphalt plant and have also recorded sounds from the industrial zone from a location well beyond the bounds of zone. We can assure the board that the sounds are at very detectable levels.

Thank you again for your time and consideration.

Marilyn Jonas