



ENHANCED PUBLIC PARTICIPATION PLAN

Applicant:
UMR BOARDS PRODUCTION, LLC

Facility:
Schluter & KB4 Facilities
Pleasant Ridge Road
Plattsburgh, New York

DEC Application Number:
5-0942-00510/0004

Pursuant to:
NYSDEC Commissioner's Policy CP-29, *Environmental Justice and Permitting*
NYSDEC Division of Environmental Permits Program Policy 24-1, *Permitting and Disadvantaged Communities*

Submitted to:
New York State Department of Environmental Conservation
Region 5
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REV 04: December 13, 2024

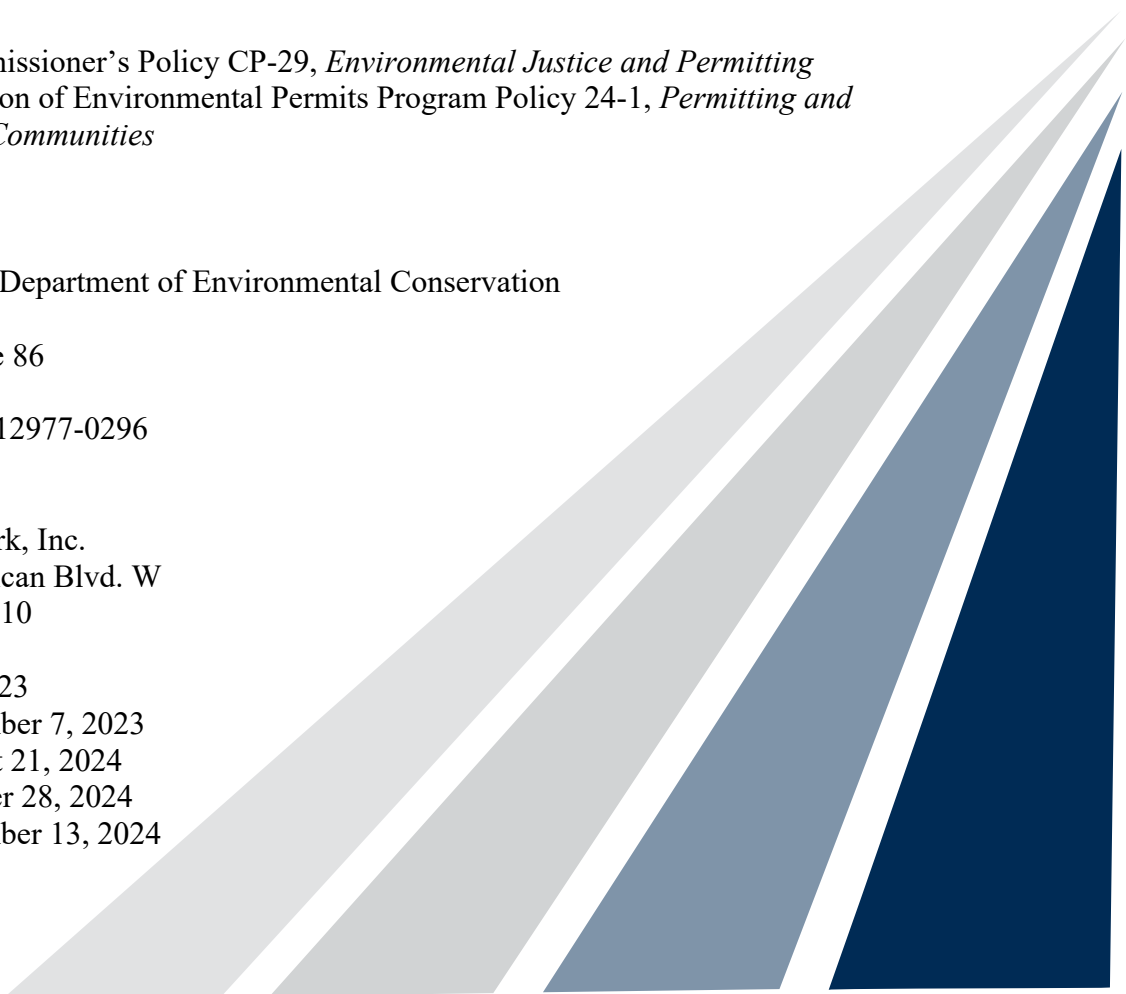
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LIST OF ACRONYMS

Acronym	Definition
CP-29	DEC Commissioner Policy 29, Environmental Justice and Permitting
DEP 24-1	Division of Environmental Permits Program Policy DEP 24-1, Permitting and Disadvantaged Communities
EPS	Expanded Polystyrene
NOCA	Notice of Complete Application
DEC	New York State Department of Environmental Conservation
NYS GIS	New York State Geographic Information Systems
PEJA	Potential Environmental Justice Area
EPPP	Enhanced Public Participation Plan
RTO	Regenerative Thermal Oxidizer
UMR	UMR Boards Production, LLC
VOC	Volatile Organic Compound
SEQRA	State Environmental Quality Review Act
SSLP	Schluter Systems, LP
SPDES	State Pollutant Discharge Elimination System
XPS	Extruded Polystyrene

1.0 INTRODUCTION AND OBJECTIVE

This Enhanced Public Participation Plan (EPPP) has been prepared on behalf of UMR Boards Production, LLC (hereinafter referred to as “applicant” or “UMR”) to fulfill and comply with the requirements of New York State Department of Environmental Conservation (DEC) Commissioner Policy 29, *Environmental Justice and Permitting* (CP-29) and Division of Environmental Permits Program Policy DEP 24-1, *Permitting and Disadvantaged Communities* (DEP 24-1) for operation of combined manufacturing areas operated by UMR and Schluter Systems LP (SSLP) that requires a Title V Air Permit Application to allow combined emissions of volatile organic compounds (VOCs) above the major source threshold, and which has been determined by DEC to potentially impact one or more potential environmental justice areas (PEJA.) (See Figure 1.) The manufacturing areas are located within census tract 36019102100, which has also been identified as a Disadvantaged Community (DAC). DEP 24-1 requires that an enhanced public participation process occur, as prescribed by CP-29.

This EPPP has been developed in accordance with the procedures established in CP-29 Section V.D and it aims to help ensure meaningful and effective public participation throughout the DEC environmental permit review process. Public participation in the DEC environmental permit review process means a program of activities that provides opportunities for stakeholders to be informed about and involved during the review of a proposed action.

The objective of this EPPP is to outline and describe the program of activities that will be implemented to actively seek and enhance public participation during the application review process.

2.0 PROJECT DESCRIPTION AND PROPOSED ACTION

2.1 PROJECT OVERVIEW

The applicant was directed to submit a Title V Air Permit Application to incorporate two existing manufacturing areas, UMR and SSLP (Schluter Facility), and a newly proposed Kerdi-Board Line 4 (KB4) facility (KB4 Facility) into a single permit. For clarity, when referring to the collective facility inclusive of both the Schluter Facility and proposed KB4 Facility, the term “Facilities” is used.

The Schluter Facility under review is located on 194 Pleasant Ridge Road in the Town of Plattsburgh, Clinton County, New York, which include buildings that house the UMR and SSLP production processes as well as the following exempt operations: a Thin-set mortar packaging facility, an R&D facility, a headquarters office building, and associated warehousing. (See Figure 1.)

The applicant currently holds a New York State Air State Facility Permit for UMR's operations, which was issued on June 28, 2018, and subsequently revised and issued on July 24, 2019.

An Air Facility Registration Application was submitted as requested by DEC on April 10, 2020 for manufacturing products made with extruded polystyrene (XPS) in the SSLP manufacturing area. This application was not issued by the DEC, as it was determined that the combined UMR and SSLP emission sources within the Schluter Facility exceeded the Title V Air Permit threshold for VOCs and that a Title V Air Permit Application should be submitted that represents the total combined emissions.

The newly proposed KB4 Facility is located on Irish Settlement Road in Plattsburgh, Clinton County, New York (see Figure 1). The facility will consist of one building totaling +/- 439,800 sq. ft. of manufacturing and warehouse space. The facility will also include construction of associated driveways, parking areas, loading docks, utility service connections, landscaping, and stormwater management facilities. The applicant will construct and operate an onsite wastewater treatment system that utilizes septic tanks and drainage fields. This new facility will house a state-of-the-art production process intended to replace the existing SSLP's Kerdi-Board production process, which will result in a significant reduction in VOC emissions.

DEC, UMR and SSLP discussed the method to address permitting for the SSLP and UMR manufacturing areas. By treating the individual operations of UMR and SSLP (each of which separately have had emissions below the Title V permitting threshold through 2021) as operations under "common control," the aggregate emissions from the combined sources exceed the Title V Air Permit threshold for VOCs. DEC issued a determination to treat the UMR and SSLP manufacturing area as one facility (the Schluter Facility) under "common control" within the meaning of the Clean Air Act. Pursuant to the common control determination, a Title V Air Permit Application initially was prepared and submitted to the DEC on June 9, 2023.

The UMR and SSLP operations within the Schluter Facility also have combustion source emissions from power and steam generation, and particulate emissions from board cutting and thin set mortar packaging operations. These non-VOC emissions are well below applicable Title V thresholds but are required to be analyzed in the Title V Air Permit Application.

In the Notice of Incomplete Application (NOIA), dated May 23, 2024, the DEC directed that the proposed KB4 Facility be added to UMR's pending Title V Air Permit Application. The proposed KB4 Facility will utilize a Kerdi-board manufacturing line processes similar to the current SSLP operation in the Schluter Facility, but will also include an extrusion process to manufacture foam board materials that were formerly procured from outside manufacturers. Projected actual process VOC emissions (7.83 tons) associated with the KB4 Facility's 2027 operations are significantly lower than SSLP's current (2023) KB3 process VOC emissions (43.8 tons). This is due to the research and development of a novel "blowing agent" technology, aimed at reducing facility-wide VOC emissions, the pollutant of concern that classifies the facility as a major source. As a result of the proposed modifications, the combined projected actual KB4 and Schluter Facility emissions (30.2 tons) will be below the VOC emissions limits of UMR's current Air State Facility (ASF) Permit limit of 49 tons.

2.2 NATURE OF PROPOSED PROJECT/ACTION AND PURPOSE

The applicant plans to continue operations of the existing Schluter Facility under this Title V Air Permit until SSLP's Kerdi-Board production line is phased out and replaced by the KB4 Facility. The KB4 extrusion process will use technology that generates lower VOC emissions by substituting a combination of CO₂, hydrofluoroolefin, and dimethyl ether for the VOC blowing agents contained in the foam board feedstock currently used in SSLP's operations at the Schluter Facility. The process will result in significantly reduced VOC emissions compared with current operations at SSLP.

Additionally, the new KB4 Facility will feature a combination of a geothermal and electric powered ("electric heat pumps") building heating system with supplemental heat produced by natural gas boilers during particularly cold temperatures. The natural gas boilers are principally required due to the dramatic reduction in electric heat pump efficiency and heating capability at particularly cold temperatures, a current engineering limitation of the technology. This new system will generate greenhouse gas emissions during those times, but at a rate that is less than the current Schluter Facility's operations.

Although not the purpose of the Title V Air Permit, the application coincides with the installation of an additional production machine (emission source "MPRS8") in the UMR manufacturing area which will increase production capacity to meet the growing market demand. Future emissions associated with this feature are discussed in the project Climate Leadership and Community Protection Act Section 7(2) and 7(3) Analysis. No other Schluter Facility expansions are being contemplated at this time.

In addition to the VOC reduction achieved from the transition from SSLP's Kerdi-Board production to KB4, the applicant has also elected to install a regenerative thermal oxidizer (RTO) at the Schluter Facility to further reduce VOC emissions. The RTO system will capture emissions from UMR and SSLP manufacturing and raw material processes until the SSLP's Kerdi-Board production line is phased out, at which point the RTO system will continue to capture emissions from the UMR manufacturing process.

The applicant has also applied for a State Pollutant Discharge Elimination System (SPDES) Individual Permit for the proposed KB4 Facility to construct a wastewater treatment system that will treat domestic sewage, backwash for the facility's reverse osmosis system, and wastewater from floor cleaning. The applicant has designed the onsite wastewater treatment systems / outfalls in accordance with the applicable design standards to be protective of water quality. It is also part of the application under review.

2.3 POTENTIAL IMPACTS

Except for the addition of MPRS8 and the installation of an RTO system noted above, the Title V Air Permit Application subject to this EPPP does not contemplate any changes to the existing Schluter Facility but rather provides for the consolidation of emissions from two existing operations under a single Title V Air Permit, and the eventual replacement of the SSLP operation at the Schluter Facility with the proposed KB4 Facility. Adjacent community impacts will not increase over current levels as part of this consolidation effort. Rather, as stated in Section 2.2 of this report, UMR has committed to installing an RTO, which will provide greater than 81% capture and control of VOC emissions, resulting in a reduction in VOC emissions when compared to current levels.

The new KB4 Facility will introduce additional greenhouse gases and co-pollutants; however, those emissions will replace higher levels of VOC emissions currently emitted by the Schluter Facility, resulting in a net reduction of total VOC emissions below UMR's current permit limit. For comparison, a Facility emissions summary table including emissions permitted under UMR's 2019 Permit, the Schluter Facility's current (2023) emissions, and anticipated emissions after SSLP is fully transferred to KB4 in 2027 is provided below.

Pollutant	Facility Emissions in Tons per Year				
	2019 UMR ASF PTE	2023 UMR and SSLP Actual (No RTO)	2027 UMR and SSLP and KB4 PTE (with RTO 8 Mold Press)	2027 UMR and KB4 PTE (with RTO 8 Mold Press)	2027 UMR and KB4 Estimated Actual
VOC	49.00*	98.70	132.00	85.30	30.20
PM10/PM2.5	1.90	1.10	14.50	11.94	3.10
NOx	18.00	2.60	44.30	44.00	11.70
CO	12.36	1.93	39.00	38.70	8.30
SO ₂	0.40	0.04	0.50	0.54	0.06
Total HAPs	0.26	0.04	0.78	0.78	0.10
CO ₂	16,513	2,678	51,965	50,801	7,198

Notes: * VOC value of 49 tons reflects the 2019 UMR ASF Permit Limit.

1. 2019 ASF PTE emissions include emissions from the exempt Research and Development facility and the exempt Thinslet cement facility that were in operation at the time of the 2019 permit update.
2. Facility co-pollutant emission calculated using EPA AP-42 Emissions Factors. RTO's CO, and NOx emissions calculated under 2027 UMR +KB4 Estimated Actual were calculated using manufacturer provided emission factors.

At the request of the DEC, the applicant has completed a *Mobile Emissions Addendum to the CLCPA Analysis*, which estimates emissions of greenhouse gas and co-pollutants, and other emissions evaluated at the request of DEC. These emissions are associated with off-road vehicles operating within the site, and from light-duty and commercial vehicles traveling to and from the facility along Pleasant Ridge Road and Irish Settlement Road to connect to NYS Route 22. The analysis did not find any significant impacts on the local disadvantaged community as it relates to traffic, co-pollutants, and other emissions evaluated at the request of DEC.

Additionally, at the request of DEC, the *Mobile Emissions Addendum to the CLCPA Analysis* has been updated to discuss the current and projected increase in mobile source emissions compared to levels of mobile source emissions at the time the 2019 UMR ASF Permit was issued. The current and projected levels of traffic are reflective of an increase in production at the Schluter Facility since the 2019 UMR ASF Permit was issued and the anticipated traffic increase from the addition of the proposed KB4 Facility. The anticipated increase in mobile source emissions associated with the KB4 Facility are reflective of and consistent with the traffic analysis provided to the Town of Plattsburgh during the Town's SEQRA review for the KB4 Facility Site Plan Approval.

The Town of Plattsburgh completed a SEQRA review of the proposed KB4 Facility, with DEC as an involved agency, and issued a Negative Declaration indicating that the project does not have the potential for significant adverse environmental impacts. Per the Town's review, the KB4 Facility may include limited impacts to visual resources, air quality, traffic, and energy. It should be noted that the Town's review included a preliminary, conservative estimate of facility emissions which have since been significantly reduced due to refinement in the design of the KB4 Facility design and advancement of the novel KB4 blowing agent technology. The route that may be used



by traffic going to and from the Facility and traveling through the PEJA is depicted on Figure 3: *Local Truck Delivery and Return Route Map*. After KB4’s completion, traffic from the combined facilities will increase from the 2023 facility total of 32,379 annual round truck trips to a projected 33,572 annual round truck trips. This volume represents an increase of 1,193 truck round trips (an increase of 4-5 trips per day) from the Schluter Facility’s current truck traffic.

The CLCPA analysis further supports the Negative Declaration as it did not find any additional impacts on the local disadvantaged community as it relates to traffic, other co-pollutant emissions, and wastewater discharge. Additionally, in the CLCPA analysis, UMR has proposed the following building design and mitigation measures:

- KB4 Facility will rely primarily on non-combustion power and heat sources (line electric power, and on-site geo-thermal)
- Installation of Four (4) onsite dual EV charging stations
- Approximately 4.65 acres of tree and shrub planting

For a complete discussion of all design and mitigation measures that were considered by UMR, please see the *CLCPA Section 7(2) and 7(3) Analysis with Mobile Source Addendum*, which can be found online and in-person at the locations specified in Section 6.0 of this EPPP. UMR will also provide a discussion on the proposed mitigation measures during the public meeting.

3.0 STAKEHOLDER IDENTIFICATION AND CONTACT LIST

A contact list consisting of the names, addresses, phone numbers, or email addresses of stakeholders to the proposed action is provided in Appendix A. The contact list was developed using the Clinton County Tax Parcel Centroid Points and Street Address Mapping geodatabase files from NYS GIS Clearinghouse to identify residential property owners and residents adjacent to the facility and/or within the potential environmental justice and disadvantaged community area located in Census Block Group 360191021002, as well as local elected officials and community-based organizations. See Table 1 below for approximate distances between the Facility and Census Block Group outreach radius boundaries.

TABLE 1: OUTREACH RADIUS

Boundary Direction	Approximate Distance from the Schluter and KB4 Facilities
North	4,390 feet
South	2,654 feet
East	2,641 feet
West	2,653 feet

The contact list also includes local news media, a daycare facility within 5,000 feet of the facilities and local elected officials. A search for organizations active in environmental justice in the Plattsburgh area, as well as schools within 5,000 feet of the Schluter Facility and KB4 Facility was performed but yielded no results. A map identifying the boundaries of the outreach radius is attached as Figure 4.

For all necessary correspondence, each Stakeholder will be contacted via US mail. The applicant will utilize this contact list to communicate and disseminate information about the consolidated Title V Air Permit Application review process to the affected community and stakeholders. This includes distribution of the written information and outreach materials described in Section 5 to inform the community about upcoming public meetings and opportunities for public participation.

The contact list will be reviewed periodically and updated as appropriate throughout the permit review process. The applicant will update the contact list with any new stakeholders identified during the public meeting or execution of other EPPP components. In addition, individuals and organizations will be added to the contact list upon request. Such requests should be submitted to the project liaison identified in Section 4. Other additions to the contact list may be made at the discretion of the applicant or, at the request of the DEC project manager, in consultation with other DEC staff, as appropriate.

4.0 PROJECT LIAISON

A representative from the project team will be available during business hours at:

Edward G. Davidson, PG
Associate Vice President
JMT of New York, Inc.
19 British American Blvd W
Latham, New York 12110
Phone: 518-782-0882
E-mail: edavidson@jmt.com

Impacted residents and interested stakeholders can contact the project liaison listed above to provide input to the project team, discuss any issues or concerns and/or to ask questions or request information. The project liaison shall respond in a timely manner and in the manner appropriate to questions or information requests received. The project liaison will be responsible for tracking and documenting public input, inquiries, questions, and information requests received, along with responses provided.

5.0 PUBLIC OUTREACH ACTIVITIES

This public participation outreach will utilize a range of engagement strategies and conduct various public outreach activities to facilitate participation, involvement, and direct communication with the affected community during the permit review process. The applicant will implement the public outreach activities outlined below upon finalization and approval of this EPPP by DEC staff.

In compliance with the requirements of CP-29, the applicant will hold public information meeting(s) to keep the public informed about the Title V Air Permit review process. The applicant will prepare, distribute and post written information and materials, including a meeting notice and fact sheet, to encourage dialogue and solicit input from interested stakeholders during the permit review process. All public outreach materials and information will be prepared and presented in an easy-to-read, understandable format, using plain language free of legal terminology, and geared towards a non-technical audience.

The public meeting notice and fact sheet will be made available and disseminated in English. In addition, the public can contact the project liaison regarding the availability of language assistance and to request that the notice and fact sheet are translated into another language for comprehension by non-English speaking or limited proficiency stakeholders.

5.1 PUBLIC MEETING(S)

To address any concerns about internet availability or reliability for the surrounding community, at least one in-person public participation meeting will be held. The applicant will consult with DEC and, if determined to be necessary, additional hybrid, in-person, and/or virtual public meeting(s) will be conducted to satisfy the intent of CP-29.

A meeting is typically required near the end of the permit review process to inform the public about: the status of, or, if applicable, the availability of, final application materials and draft permits for review; the pending DEC public comment period, and deadline to submit written comments to DEC, if established; and eventual final decision. Meetings may also be held earlier, either pursuant to this plan or as determined through applicant and DEC consultation. The applicant will consult with DEC to determine the total number of public meetings, and at which point in the permit review process the public meetings should be held to be most useful to encourage community and stakeholder engagement.



5.1.1 Public Meeting: Early Engagement

The project involves the existing facility and a proposed facility which has previously undergone Town-lead agency coordinated SEQRA review as well as local land use approvals, including as recently as 2023. Each of those approvals had the opportunity for public comment by community members. Based upon prior site approval activities, significant public opposition or controversy is not anticipated. Therefore, the applicant does not propose Early Engagement.

5.1.2 Public Meetings: At or Near Completeness

The Applicant will facilitate an in-person public meeting starting at 6:00 PM on Wednesday, January 29, 2025, at the Town of Plattsburgh Offices to:

- Inform the public about the permit application review status.
- Provide the opportunity for stakeholders to ask questions and express concerns about the project and identify how to obtain information or answers to questions after the meeting has concluded.
- Solicit input from members of the disadvantaged community regarding the proposed project design considerations.
- Inform attendees how they may submit written comments on the permit application to the DEC during the public comment period and, if available, identify any applicable deadlines.

5.1.3 Necessary Meeting Discussion Points and Requirements

Public meetings will be facilitated by the applicant and/or representatives from their project team (project personnel) in-person, and/or via Microsoft Teams, to solicit questions and feedback from attendees. During the meetings, the applicant and/or representatives from their project team will present a brief overview of the project, including any relevant background information, details on the permitting action, scope of work, schedule, and community impacts. The meetings will include a question-and-answer portion where the floor will be open for attendees to ask questions, make remarks, and/or express concerns. In addition, the following discussion points will be addressed:

- Provide an update on the permit review process and identify outstanding application requirements and future milestones in the permit review process.

- Make it clear that the meeting is being held prior to DEC’s permitting decision for the project/action.
- Identify the locations of the online document repository and the physical document repository, provide directions on how attendees may obtain and review materials relevant to the application, and documents related to the meeting and other public participation plan components.
- Identify and provide contact information for the project liaison and announce procedures for how attendees may obtain answers to questions after the meeting has concluded and interested stakeholders can submit questions, express concerns, or request additional information by telephone, email, and in writing.
- Announce any future outreach, opportunities for public participation, and/or required follow-up with attendees including, but not limited to: additional meetings and future mailings, including, but not limited to the Notice of Complete Application.

In-person meeting attendance will be recorded at the meeting location with a sign-in sheet. Virtual meeting attendance will be recorded by virtual sign-in sheet and/or the Teams chat function. The applicant will track the number of attendees for all meetings held during implementation of this EPPP and, where feasible and applicable, identify any affiliation of participants and interests represented at the meeting. In addition, the applicant will be responsible for documenting meeting notes or minutes, along with a record of comments and questions raised in the meeting and respective responses and answers provided. Attendees not identified on the contact list will have the option to be added in the event of future meetings or information sharing.

5.2 PUBLIC MEETING NOTICE PREPARATION AND DISTRIBUTION

Information regarding the details of the in-person public meeting and how to participate is contained in the reader-friendly meeting notice shown in Appendix B. The notice has been prepared in English. Through this notice, the public will be invited and encouraged to attend the public meeting scheduled on January 29, 2025, at 6:00 PM.

Once the EPPP has been approved by DEC, the public meeting notice will be posted and available in the document repositories described in Section 6 of this document. At least two weeks in advance of the public meeting, the notice will be published in *The Sun Community News and Printing* and *Press Republican*, which are newspapers printed, published, and circulated weekly/daily (respectively) serving the Plattsburgh region. In addition, the public meeting notice

will be emailed, mailed and/or hand delivered (door-to-door) to the stakeholders identified in the contact list in Appendix A at least two weeks prior to the public meeting.

5.3 FACT SHEET PREPARATION AND DISTRIBUTION

Factual information on the proposed Title V air permitting action, including an overview, purpose statement, and potential impacts, is outlined in the reader-friendly fact sheet shown in Appendix C. In addition, the fact sheet outlines how interested stakeholders can: participate in the permit application review process; access the document repositories to review relevant application materials prior to the public meeting; and contact the project team to obtain additional information. The fact sheet has been prepared in English.

Once the EPPP has been approved by DEC, the fact sheet will be posted and available in the document repositories described in Section 6 of this document. No later than 2 weeks prior to the public meeting, the applicant will distribute the fact sheet to provide stakeholders with relevant background on the proposed project/action and facilitate meaningful participation during the meeting. The fact sheet will be distributed together with the public meeting notice via email, mail and/or hand delivery (door-to-door).

The fact sheet(s) will also be posted within the vicinity of the project site and visible to the public. For example, the fact sheet(s) may be posted on streetlight lampposts or bulletin boards located in the lobby of residential complex buildings or public facilities such as libraries, schools, or community centers within the project site.

5.4 DISTRIBUTION OF NOTICE OF COMPLETE APPLICATION

Once DEC determines the application(s) for the proposed action/project is complete and provides the Notice of Complete Application (NOCA) to the applicant, the applicant will distribute the NOCA and draft permit, if applicable, to the meeting attendees and any identified interested parties, to provide notification regarding the start of the DEC public comment period and to announce the deadline for submission of written comments to DEC. If the NOCA is available at the time of the meeting, the applicant will distribute the NOCA at the public meeting. If the NOCA is not available at the time of the meeting, the applicant will provide explicit instructions on how to access the online repository and inform the attendees that, once available, the NOCA will be posted to the document repositories and will be distributed to attendees via email or mail as soon as possible, but no later than the date that the NOCA is published by the applicant in the print edition of a paid local newspaper that is circulated at least weekly and available in the municipality in which the project is located.

6.0 DOCUMENT REPOSITORY

An online document repository (virtual public meeting space) has been established for the community and interested stakeholders to access and review information about the project. The online repository available at <https://feature.jmt.com/umr-boards-production> will provide information and documents relating to the project and permit application. A physical document repository will be located at the Town of Plattsburgh Offices, so stakeholders without internet access can view the same project information described above.

Both repositories will be updated throughout the permit review process with project-related information and written materials (e.g., application forms and supporting materials, draft permit, fact sheet, statement of basis (where applicable), the Notice of Complete Application provided by the DEC, etc.).

7.0 SUBMISSIONS

7.1 PROGRESS REPORT

No later than two weeks following the first public participation event, the applicant will submit a progress report to DEC in the form of a brief memorandum or cover letter. At minimum, the progress report shall:

- Describe progress to-date in implementing the approved EPPP, identify the components of the plan yet to be implemented, and the timeline for completion of the EPPP.
- Summarize the public meeting (identify the time and date, number, affiliation and diversity of attendees and interests represented) and include or append copies of the written materials (i.e. public meeting notice, fact sheet, etc.) along with any documentation that supports implementation of public outreach activities described in Section 5, such as: the meeting sign-in sheet, record of attendees/participants, meeting presentation, notes or minutes, summary of questions and answers, and copy of newspaper notice or other proof of publication.
- Identify any language or disability assistance requests received and document any considerations or accommodations made to-date.
- Summarize or include a table that documents:

- All substantive concerns raised to-date, either during the public meeting, or, received by the project liaison, along with responses provided by the applicant; and
- All resolved and outstanding issues.
- Explain any project, design changes and/or measures to reduce potential impacts, either as result of community/public input or DEC permitting review process.

The progress report will become part of the application record and will be posted to the document repositories so that it is readily available to the public.

7.2 FINAL SUMMARY REPORT AND WRITTEN CERTIFICATION

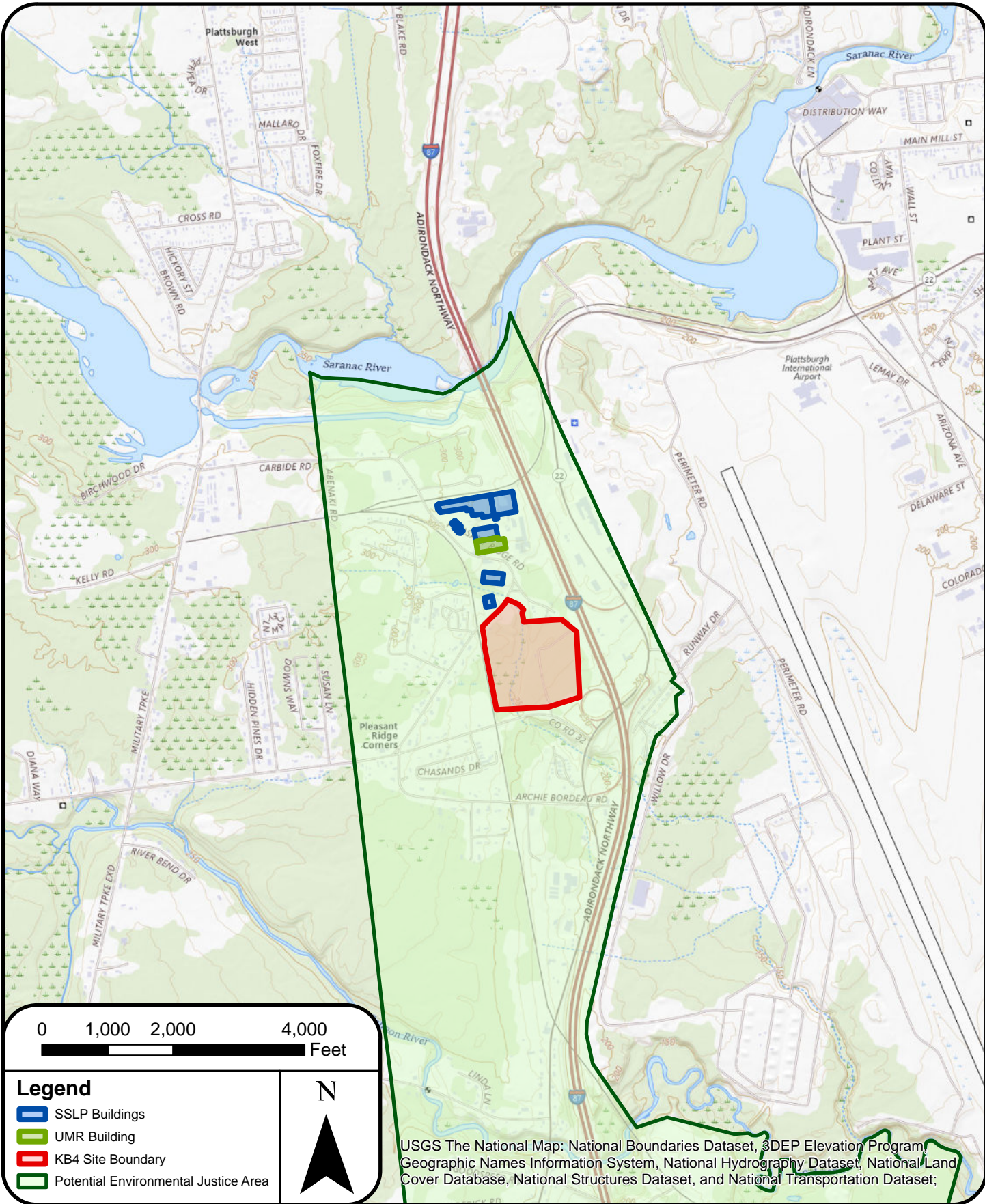
Upon completion of the enhanced public participation plan, the applicant will submit written certification to DEC to certify that it has fully executed and complied with the approved EPPP. The certification shall be signed by the applicant, or the applicant's agent, and submitted to DEC prior to a final decision on the application.

As part of the certification, the applicant shall submit a final summary report documenting the implementation of this EPPP. The report will summarize the activities that occurred in accordance with the EPPP and will identify any substantive concerns raised by stakeholders during the public meeting, or, at any time throughout the permitting process and detail the applicant's response(s) to any such concerns or questions. The applicant will include, or append, any documentation that supports the final summary report, such as: the meeting sign-in sheet(s), record of attendees/participants, meeting presentation, notes or minutes, summary of questions and answers, and copy of newspaper notice or other proof of publication. In addition, the report will identify any changes or modifications to the proposed project that were made or considered by the applicant to address or reduce concerns surrounding the permit application.

The final summary report and written certification will become part of the application record and will be posted to the document repositories so that it is readily available to the public.



FIGURES



19 British American Blvd. W. Latham NY 12110
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SITE LOCATION AND PEJA MAP
UMR BOARDS PRODUCTION, LLC
EPPP

TOWN OF PLATTSBURGH

CLINTON COUNTY, NY

PROJ. NO: 17-S0125N-001

DATE: 07/29/2024

SCALE: 1 IN = 2,000 FT

DWG NO. -

FIGURE: 1



19 British American Blvd. W. Latham NY 12110
 P: 518-782-0882 | F: 518-782-0973 | JMT.com

SITE PLAN MAP
 UMR BOARDS PRODUCTION, LLC
 EPPP

TOWN OF PLATTSBURGH

CLINTON COUNTY, NY

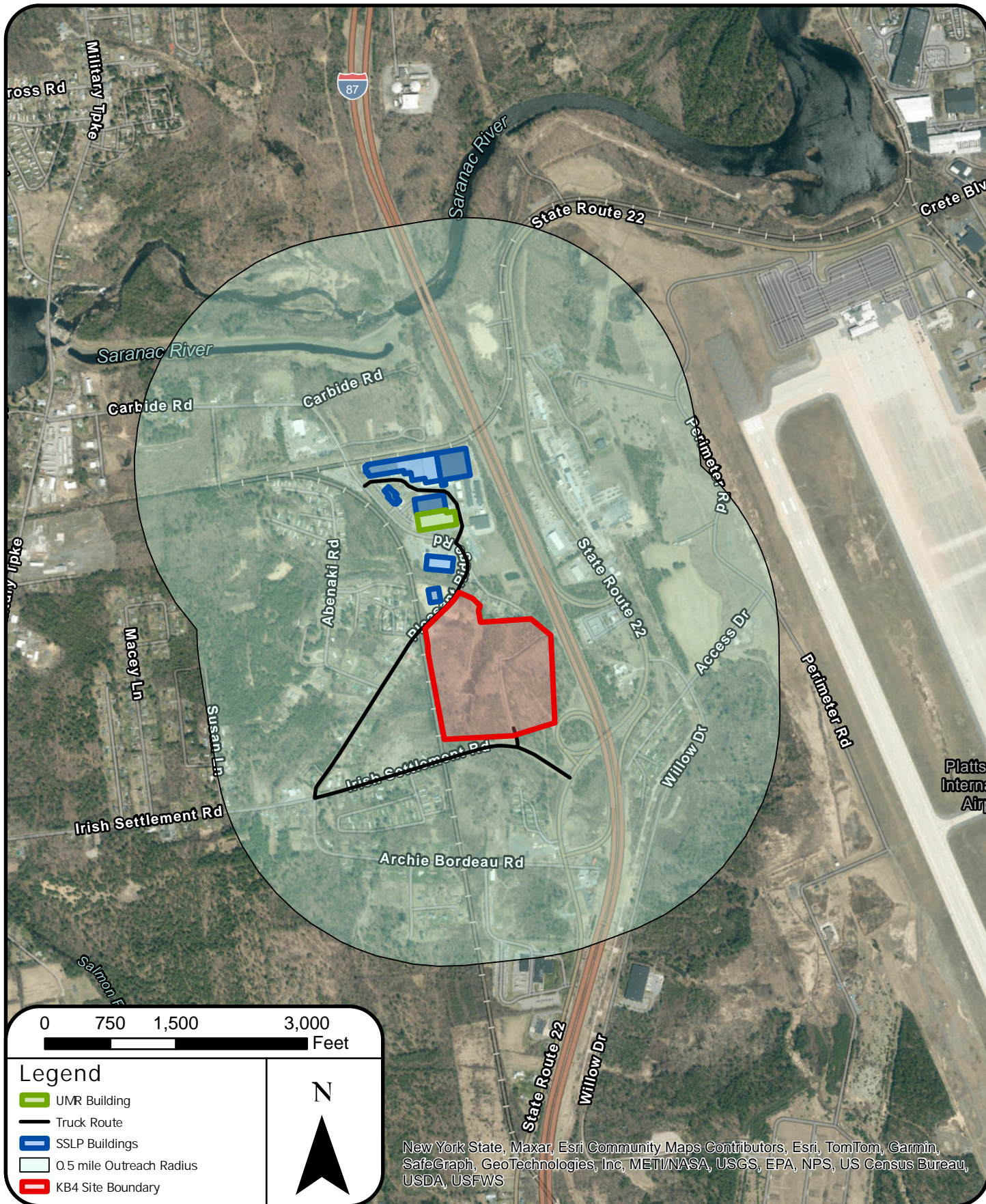
PROJ. NO: 17-S0125N-001

DATE: 07/29/2024

SCALE: 1 IN = 500 FT

DWG NO. -

FIGURE: 2



New York State, Maxar, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

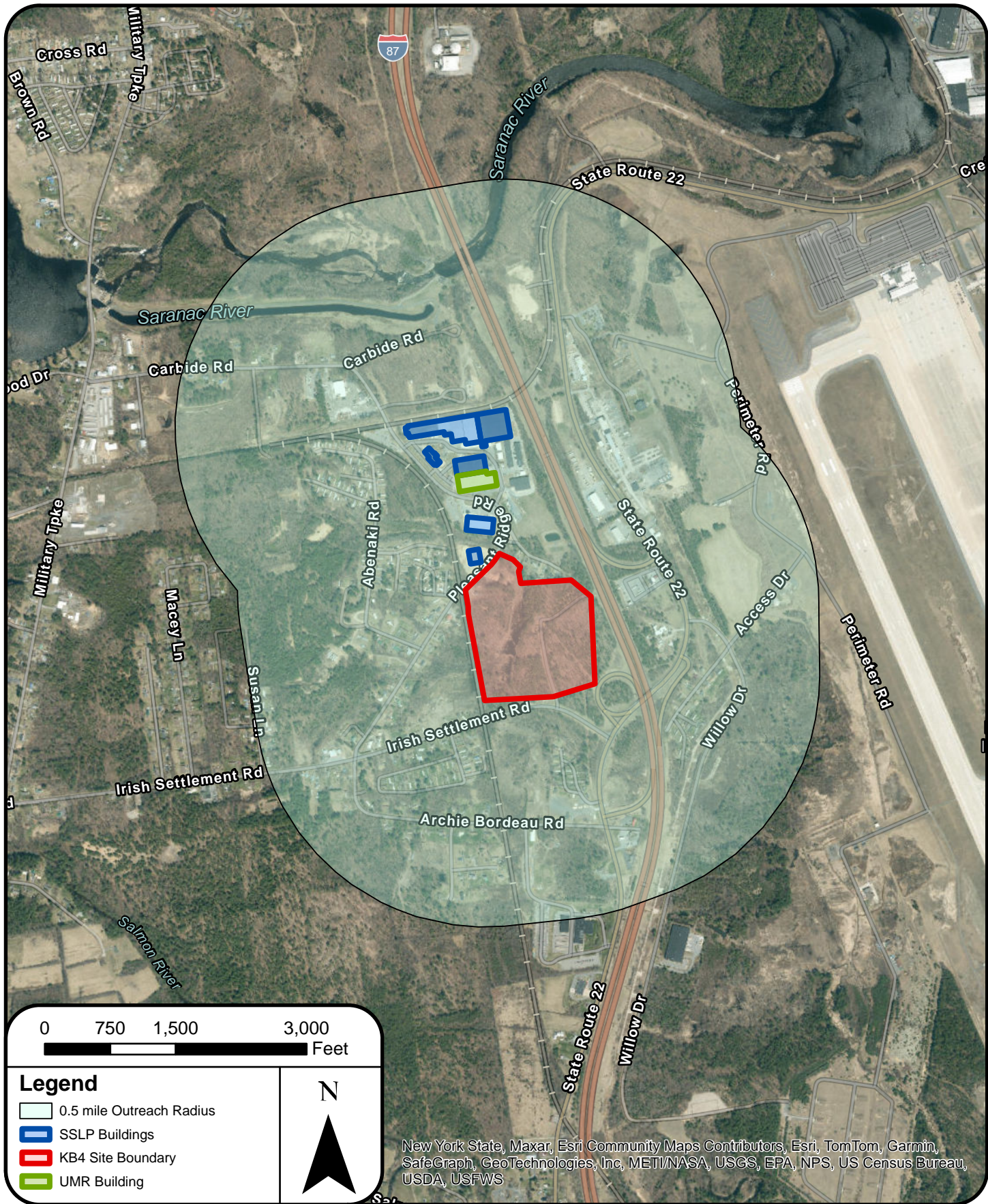


LOCAL TRUCK DELIVERY AND RETURN ROUTE MAP

UMR BOARDS PRODUCTION, LLC
EPPP

TOWN OF PLATTSBURGH CLINTON COUNTY, NY

PROJ. NO: 17-S0125N-001	DATE: 07/29/2024	SCALE: 1 IN = 1,500 FT	DWG NO. -	FIGURE: 3
-------------------------	------------------	------------------------	-----------	-----------



New York State, Maxar, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS



19 British American Blvd. W. Latham NY 12110
P: 518-782-0882 | F: 518-782-0973 | JMT.com

OUTREACH RADIUS MAP
 UMR BOARDS PRODUCTION, LLC
 EPPP

TOWN OF PLATTSBURGH CLINTON COUNTY, NY

PROJ. NO: 17-S0125N-001	DATE: 07/29/2024	SCALE: 1 IN = 1,500 FT	DWG NO. -	FIGURE: 4
-------------------------	------------------	------------------------	-----------	-----------



APPENDIX A

CONTACT LIST

Table 1 Contact List



Tax Parcel	Parcel Address	Land Use	Owner Name	Owner Address
232.-3-22.6	87 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Armagost, Joseph	87 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-15.1	14 Whispering Pines Rd, Plattsburgh, NY 12901	Residential	Arnold, Charlene A	14 Whispering Pines Rd, Plattsburgh, NY 12901
232.-3-41.71	77 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Bailey, Stuart	77 Pleasant Ridge Rd, Plattsburgh, NY 12901
245.-4-11.1	135 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Bair, Scott L	3 Runway Dr, Plattsburgh, NY 12901
232.-3-38	29 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Baker, Toni Jo	29 Pleasant Ridge Rd, Plattsburgh, NY 12901
245.-4-12	129 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Barcomb, Martha	129 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-40.1	Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Bennett, Ryan	5 Jerry Dr, Plattsburgh, NY 12901
232.-3-28.22	30 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Bennett, Steven D	30 Pleasant Rdg Rd, Plattsburgh, NY 12901
232.-3-5	54 Carbide Rd, Plattsburgh, NY 12901	Residential	Bernard, Dustin	41 Natures Way, Plattsburgh, NY 12992
245.-10-2	103 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Biddle, Joella C	129 Lakeland Ave Apt 295, Plattsburgh, NY 11782
232.-3-27.8	68 Irish Settlement Rd, Plattsburgh, NY, 12901	Mobile Home -Residential	Blanchard, Orrell	68 Irish Settlement Rd, Plattsburgh, NY 12901
245.-4-7	131 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Bouyea, Georgianna	131 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-19	38 Irish Settlement Rd, Plattsburgh, NY 12901	Residential - Vacant	Brunell Donna M	38 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-43.5	37 Abenaki Rd, Plattsburgh, NY 12901	Residential	Choong, Hwa Suk	210 N Geneva St, Plattsburgh, NY 14850
245.-4-8	145 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Ciolek, Amy L	145 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-37	33 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Cobb, Mark W III	33 Pleasant Ridge Rd, Plattsburgh, NY 12901
245.-10-3	95 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Criss, Kalika L	95 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-1.1	98 Carbide Rd, Plattsburgh, NY 12901	Residential - Duplex	Depo, Jean A	98 Carbide Rd, Plattsburgh, NY 12901
232.-3-16	24 Whispering Pines Rd, Plattsburgh, NY 12901	Residential	Desso, William	24 Whispering Pines Rd, Plattsburgh, NY 12901
232.-3-35	41 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Deyo, Ralph M	41 Pleasant Rdg Rd, Plattsburgh, NY 12901
232.-3-27.5	92 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	DiPalma, Bernard J	2503 Conway Blvd, Plattsburgh, NY 33952
233.-1-7	8 Runway Dr, Plattsburgh, NY 12901	Residential	DMP Rentals LLC	7631 Route 9, Plattsburgh, NY 12901
232.-3-28.21	24 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Dubrey, Mark	24 Pleasant Ridge Rd, Plattsburgh, NY 12901

Table 1 Contact List



Tax Parcel	Parcel Address	Land Use	Owner Name	Owner Address
232.-3-23.2	118 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Dustin, Bruce	110 S Colonia Way, Plattsburgh, NY 85296
245.-4-9	143 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Duval, Theresa M	143 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-22.8	97 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Eilers, Ryan R	97 Irish Settlement Rd, Plattsburgh, NY 12901
233.-1-11	28 Runway Dr, Plattsburgh, NY 12901	Residential	Facteau, Reginald H	767 Military Tpke, Plattsburgh, NY 12901
232.-3-41.5	10 Abenaki Rd, Plattsburgh, NY 12901	Residential	Farr, Kaylee	10 Abenaki Rd, Plattsburgh, NY 12901
232.-3-28.1	40 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Farr, Tina M	40 Pleasant Rdg Rd, Plattsburgh, NY 12901
232.-3-4.11	66 Carbide Rd, Plattsburgh, NY 12901	Residential	Garrow, Edward	651 Mason St, Plattsburgh, NY 12962
245.-4-6	133 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Godfrey, Samuel	133 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-43.8	1 Gregory Ln, Plattsburgh, NY 12901	Residential	Gregory, Phyllis M	1 Gregory Ln, Plattsburgh, NY 12901
232.-3-27.3	102 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Grosskopf, Kimberly A	102 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-22.3	103 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Hamrane, Rachida	103 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-41.9	9 Abenaki Rd, Plattsburgh, NY 12901	Residential	Hendrie, Gene	9 Abenaki Rd, Plattsburgh, NY 12901
233.-1-16	15 Runway Dr, Plattsburgh, NY 12901	Residential	Hewitt, James P	4862 CR 307, Plattsburgh, NY 33538
232.-3-27.12	78 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Hubbard, Donald L	11 Sawyer Ln, Plattsburgh, NY 12962
245.-4-5	139 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Imhoff, Robert	139 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-40.11	Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Jennette, Joseph K	3 Pleasant Rdg Rd, Plattsburgh, NY 12901
232.-3-27.6	88 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Kissane, Reagan Jayne	88 Irish Settlement Rd, Plattsburgh, NY 12901
233.-1-10	24 Runway Dr, Plattsburgh, NY 12901	Residential	Laforest, David	24 Runway Dr, Plattsburgh, NY 12901
232.-3-39	27 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	LaMarque, Mary	P.O. Box 2051, Plattsburgh, NY 12901
233.-1-17	11 Runway Dr, Plattsburgh, NY 12901	Residential	Lambert, Eleanor	181 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-14	8 Whispering Pines Rd, Plattsburgh, NY 12901	Residential	Langjan, Frank A	8 Whispering Pines Rd, Plattsburgh, NY 12901
245.-10-7	67 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Lanthier, Pierre	67 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-1.2	86 Carbide Rd, Plattsburgh, NY 12901	Residential	Larrabee, Michelle A	86 Carbide Rd, Plattsburgh, NY 12901

Table 1

Contact List



Tax Parcel	Parcel Address	Land Use	Owner Name	Owner Address
232.-3-43.4	38 Abenaki Rd, Plattsburgh, NY 12901	Residential	Lighthouse Properties	61 Miller St Unit, Plattsburgh, NY 12901
232.-3-13	4 Whispering Pines Rd, Plattsburgh, NY 12901	Residential	Longe, Paul	P.O. Box 309, Plattsburgh, NY 12962
232.-3-41.8	11 Abenaki Rd, Plattsburgh, NY 12901	Residential	Macey, James E	11 Abenaki Rd, Plattsburgh, NY 12901
232.-3-31	76 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Macey, James L	76 Pleasant Ridge Rd, Plattsburgh, NY 12901
232.-3-41.1	66 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Macey, Larry	66 Pleasant Rdg Rd, Plattsburgh, NY 12901
232.-3-41.72	71 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Macey, Steven J	71 Pleasant Ridge Rd, Plattsburgh, NY 12901
245.-4-10	Archie Bordeau Rd, Plattsburgh, NY 12901	Residential - Vacant	Mantikas, Michael	162 West Pierson Ave, Plattsburgh, NY 08244
232.-3-34	81 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	McCarrell, Clifford P	81 Pleasant Ridge Rd, Plattsburgh, NY 12901
245.-10-1	113 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	McClatchie, Robert D	113 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-25.4	Archie Bordeau Rd, Plattsburgh, NY 12901	Residential Vacant	Mousseau Properties LLC	69 Fort Brown Dr Unit 2, Plattsburgh, NY 12903
232.-3-27.9	Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Mousseau, Ken	69 Fort Brown Dr, Plattsburgh, NY 12903
232.-3-41.4	47 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Neighbors of Abenaki LLC	P.O. Box 117, Plattsburgh, NY 80201
232.-3-22.5	79 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Papp, James E	79 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-26	Irish Settlement Rd, Plattsburgh, NY 12901	Walk-up apt	Pellerin, Paul	110 Irish Settlement Rd, Plattsburgh, NY 12901
245.-10-4	89 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Phaneuf, Clifton W	89 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-41.2	53 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Pratt, James	53 Pleasant Ridge Rd, Plattsburgh, NY 12901
232.-3-22.1	Irish Settlement Rd, Plattsburgh, NY 12901	Trailer park	River Rat Properties, Inc.	156 Jabez Allen Rd, Plattsburgh, NY 12972
232.-3-43.6	32 Abenaki Rd, Plattsburgh, NY 12901	Residential	Rood-Benjamin, Betty	32 Abenaki Rd, Plattsburgh, NY 12901
233.-1-8	12 Runway Dr, Plattsburgh, NY 12901	Residential	Russell, Andrew T	12 Runway Dr, Plattsburgh, NY 12901
232.-3-27.4	96 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Senecal, Darlene M	P.O. Box 44, Plattsburgh, NY 12962
233.-1-18	7 Runway Dr, Plattsburgh, NY 12901	Residential	Shepherd, Patricia	7 Runway Dr, Plattsburgh, NY 12901
232.-3-33	Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential - Trailer park	Side, Jonathan D	625 Tom Miller Rd, Plattsburgh, NY 12901
232.-3-22.7	91 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Simmons, Kenneth L	91 Irish Settlement Rd, Plattsburgh, NY 12901

Table 1 Contact List



Tax Parcel	Parcel Address	Land Use	Owner Name	Owner Address
232.-3-22.11	70 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Smith, Noel	70 Archie Bordeau Rd, Plattsburgh, NY 12901
233.-1-15	21 Runway Dr, Plattsburgh, NY 12901	Residential	Snide, Kaleb	21 Runway Dr, Plattsburgh, NY 12901
232.-3-3	74 Carbide Rd, Plattsburgh, NY 12901	Residential	Snider, Gary	74 Carbide Rd, Plattsburgh, NY 12901
232.-3-23.1	82 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Speedling, Sheila M	82 Archie Bordeau Rd, Plattsburgh, NY 12901
233.-1-9	16-18 Runway Dr, Plattsburgh, NY 12901	Residential	Stampfler, Deborah L	18 Runway Dr, Plattsburgh, NY 12901
245.-10-5	81 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Strauss, Leonard	81 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-22.2	67 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Strong, Austin	67 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-27.7	72 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Sweet, Linda R	72 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-29	52 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Taylor, Stormy L	52 Pleasant Rdg Rd, Plattsburgh, NY 12901
232.-3-24	126 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Thomas, Joseph L III	P.O. Box 2405, Plattsburgh, NY 12901
245.-4-3	143 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Tripp, Robert	143 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-47.2	87 Carbide Rd, Plattsburgh, NY 12901	Residential	Tyler, Anthony	87 Carbide Rd, Plattsburgh, NY 12901
232.-3-18	26 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	UMS Property LLC	194 Pleasant Ridge Rd, Plattsburgh, NY 12901
232.-3-41.3	61 Pleasant Rdg Rd, Plattsburgh, NY 12901	Residential	Wade, Patricia L	61 Pleasant Rdg Rd, Plattsburgh, NY 12901
245.-4-4	141 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Wood, Leo	141 Irish Settlement Rd, Plattsburgh, NY 12901
245.-10-6	75 Archie Bordeau Rd, Plattsburgh, NY 12901	Residential	Young, Richard A Jr	75 Archie Bordeau Rd, Plattsburgh, NY 12901
232.-3-22.9	109 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Zatylny, Frank S	109 Irish Settlement Rd, Plattsburgh, NY 12901
232.-3-20	30 Archie Bordeau Rd, Plattsburgh, NY 12901	Trailer park	Smash Properties LLC	17 Superior Dr, Plattsburgh, NY 12901
232.-3-30	62 Pleasant Ridge Rd, Plattsburgh, NY 12901	Residential	Stephen Cobb	62 Pleasant Rdg Rd, Plattsburgh, NY 12901
245.-10-11	7 Joshua Dr, Plattsburgh, NY 12901	Residential	Thomas J Vidulich Deborah A Dowd	7 Joshua Dr, Plattsburgh, NY 12901
245.-10-9	3 Joshua Dr, Plattsburgh, NY 12901	Residential	Nichole O'Brian Sean O'Brian	5 College Ave Apt D, Plattsburgh, NY 12901
245.-10-8	1 Joshua Dr, Plattsburgh, NY 12901	Residential	John Cauffman Cynthia Cauffman	1 Joshua Dr, Plattsburgh, NY 12901
232.-3-22.3	103 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Rachida Hamrane	103 Irish Settlement Rd, Plattsburgh, NY 12901

Table 1 Contact List



Tax Parcel	Parcel Address	Land Use	Owner Name	Owner Address
245.-4-1	149 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Romeo Barnard c/o Michelle Barnard Joyce Barnard estate	171 Irish Settlement Rd, Plattsburgh, NY 12901
232.-2-10	162 Irish Settlement Rd, Plattsburgh, NY 12901	Residential	Veronica Macey Life Use Michael Kelly Donald Kelly	162 Irish Settlement Rd, Plattsburgh, NY 12901
232.-2-9.1	6 Susan Ln, Plattsburgh, NY 12901	Residential	Paul R Acton Lauren A Acton	6 Susan Ln, Plattsburgh, NY 12901
232.-2-8.7	10 Susan Ln, Plattsburgh, NY 12901	Residential	Dorrine Provost Life Use Clayton S Provost Sharon Boice	10 Susan Ln, Plattsburgh, NY 12901
232.-2-8.8	12 Susan Ln, Plattsburgh, NY 12901	Residential	Neighbors of Abenaki LLC	P.O. Box 117, Denver, CO 80201
232.-2-9.2	4 Susan Ln, Plattsburgh, NY 12901	Residential	Robert G St John Angela M St John	4 Susan Ln, Plattsburgh, NY 12901
245.-10-16	1 Superior Dr, Plattsburgh, NY 12901	Residential	Daniel M Shaughnessy Cheryl A Shaughnessy	1 Superior Dr, Plattsburgh, NY 12901
245.-10-12	2 Joshua Dr, Plattsburgh, NY 12901	Residential	Donald Hastings Lisa Hastings	2 Joshua Dr, Plattsburgh, NY 12901
245.-10-13	4 Joshua Dr, Plattsburgh, NY 12901	Residential	Cory Davison	4 Joshua Dr, Plattsburgh, NY 12901
245.-10-14	6 Joshua Dr, Plattsburgh, NY 12901	Residential	Josh Bushey Makalyn Ross	6121 Rt 22, Plattsburgh, NY 12901
245.-10-15	8 Joshua Dr, Plattsburgh, NY 12901	Residential	Nicholas Stewart Tim Stewart	8 Joshua Dr, Plattsburgh, NY 12901
232.-5-3	122 Carbide Rd, Plattsburgh, NY 12901	Residential	Keith E Boyd	122 Carbide Rd, Plattsburgh, NY 12901
232.-1-12.321	125 /119 Carbide Rd, Plattsburgh, NY 12901	Residential	Roger W Murray Diana R Murray	119 Carbide Rd, Plattsburgh, NY 12901
232.-1-12.322	111 Carbide Rd, Plattsburgh, NY 12901	Residential	Roger W Murray Diana R Murray	119 Carbide Rd, Plattsburgh, NY 12901
232.-5-1	106 Carbide Rd, Plattsburgh, NY 12901	Residential	Edward G Gebo Judy L Gebo	106 Carbide Rd, Plattsburgh, NY 12901

Table 1

Contact List



Misc. Stakeholders | Source: manual online search

Name	Address	Zip Name	Zip Code	Use
Schools/Daycares				
Kidzone Family Daycare	133 Irish Settlement Rd	Plattsburgh	12901	Day care
Newspapers				
Sun Community News & Printing	178 Broad St	Plattsburgh	12901	-
Press Republican	170 Margaret St	Plattsburgh	12901	-
Town Supervisor	Office Address:	Zip Name	Zip Code	Phone
Michael S. Cashman	151 Banker Road	Plattsburgh	12901	518- 562-6813
Local Offices	Office Address:	Zip Name	Zip Code	Phone
Glen Cutter Director of Planning	First Floor, Old Surrogate Building Clinton County Gov. Center 135 Margaret Street Plattsburgh, NY 12901	Clinton County NY	12901	518-565-4711
NYS Senator's	Office Address	District	Zip Code	Phone
Senator Daniel G. Stec	5 Warren Street Suite 3 Glens Falls, NY 129801	District 45	12801	518-743-0968
Senator Charles "Chuck" Schumer	780 Third Avenue, Suite 2301. New York, NY 10017	District 1	10017	212- 486-4430
Kristen Gillibrand -D	Leo W. O'Brien Federal Office Bldg 11A Clinton Ave, Fm 821 Albany , NY	District 20	12207	518-431-0120
Assemblyman	Office Address	District	Zip Code	Phone
Senator Billy Jones	District Office: 202 U.S. Oval Plattsburgh, NY 12903	District 115	12903	518-562-1986
Congresswoman	Office Address	District	Zip Code	Phone
Congresswoman Elise Stefanik	137 Margaret Street, Suite 100 Plattsburgh, NY 12901	District 21	12901	202-225-4611

Table 1

Contact List



Additional Addresses |

Source: Clinton County SAM address points within search area (NYS GIS Clearinghouse)

Address	Use
1 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
1 Ball St, Plattsburgh, NY 12901	Mobile home residential
1 Birch St, Plattsburgh, NY 12901	Mobile home residential
1 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
1 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
1 LeClair Cul De Sac, Plattsburgh, NY 12901	Mobile home residential
1 Redwood St, Plattsburgh, NY 12901	Mobile home residential
1 Side St, Plattsburgh, NY 12901	Mobile home residential
10 Ball St, Plattsburgh, NY 12901	Mobile home residential
10 Birch St, Plattsburgh, NY 12901	Mobile home residential
10 Haniko Ln, Plattsburgh, NY 12901	Mobile home residential
10 Redwood St, Plattsburgh, NY 12901	Mobile home residential
100 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
102 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
106 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
107 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
108 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
109 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
11 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
11 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
11 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
11 Tammy Ln, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
110 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
110 Irish Settlement Rd Floor 1, Plattsburgh, NY 12901	Mobile home residential
110 Irish Settlement Rd Floor 2, Plattsburgh, NY 12901	Mobile home residential
111 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
112 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
112 Irish Settlement Rd, Plattsburgh, NY 12901	Mobile home residential
112 Irish Settlement Rd Apartment 1, Plattsburgh, NY 12901	Mobile home residential
112 Irish Settlement Rd Apartment 2, Plattsburgh, NY 12901	Mobile home residential
113 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
114 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
115 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
116 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
117 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
118 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
119 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
12 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
12 Ball St, Plattsburgh, NY 12901	Mobile home residential
12 Birch St, Plattsburgh, NY 12901	Mobile home residential
12 Haniko Ln, Plattsburgh, NY 12901	Mobile home residential
12 Redwood St, Plattsburgh, NY 12901	Mobile home residential
12 Tammy Ln, Plattsburgh, NY 12901	Mobile home residential
120 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
122 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
124 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
126 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
128 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
13 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
13 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
13 Tammy Ln, Plattsburgh, NY 12901	Mobile home residential
14 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
14 Ball St, Plattsburgh, NY 12901	Mobile home residential
14 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
14 Redwood St, Plattsburgh, NY 12901	Mobile home residential
14 Tammy Ln, Plattsburgh, NY 12901	Mobile home residential
15 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
15 Redwood St, Plattsburgh, NY 12901	Mobile home residential
15 Tammy Ln, Plattsburgh, NY 12901	Mobile home residential
16 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
16 Ball St, Plattsburgh, NY 12901	Mobile home residential
16 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
16 Redwood St, Plattsburgh, NY 12901	Mobile home residential
16 Runway Dr, Plattsburgh, NY 12901	Mobile home residential
17 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
17 Redwood St, Plattsburgh, NY 12901	Mobile home residential
18 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
18 Ball St, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
18 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
18 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
18 Redwood St, Plattsburgh, NY 12901	Mobile home residential
18 Runway Dr, Plattsburgh, NY 12901	Mobile home residential
19 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
19 Redwood St, Plattsburgh, NY 12901	Mobile home residential
2 Ball St, Plattsburgh, NY 12901	Mobile home residential
2 Birch St, Plattsburgh, NY 12901	Mobile home residential
2 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
2 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
2 Redwood St, Plattsburgh, NY 12901	Mobile home residential
2 Side St, Plattsburgh, NY 12901	Mobile home residential
20 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
20 Ball St, Plattsburgh, NY 12901	Mobile home residential
20 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
20 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
20 Redwood St, Plattsburgh, NY 12901	Mobile home residential
203 Cedar St, Plattsburgh, NY 12901	Mobile home residential
205 Cedar St, Plattsburgh, NY 12901	Mobile home residential
206 Cedar St, Plattsburgh, NY 12901	Mobile home residential
207 Cedar St, Plattsburgh, NY 12901	Mobile home residential
208 Cedar St, Plattsburgh, NY 12901	Mobile home residential
209 Cedar St, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
21 Ball St, Plattsburgh, NY 12901	Mobile home residential
21 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
21 Redwood St, Plattsburgh, NY 12901	Mobile home residential
210 Cedar St, Plattsburgh, NY 12901	Mobile home residential
211 Cedar St, Plattsburgh, NY 12901	Mobile home residential
212 Cedar St, Plattsburgh, NY 12901	Mobile home residential
213 Cedar St, Plattsburgh, NY 12901	Mobile home residential
214 Cedar St, Plattsburgh, NY 12901	Mobile home residential
215 Cedar St, Plattsburgh, NY 12901	Mobile home residential
216 Cedar St, Plattsburgh, NY 12901	Mobile home residential
22 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
22 Ball St, Plattsburgh, NY 12901	Mobile home residential
22 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
22 Redwood St, Plattsburgh, NY 12901	Mobile home residential
23 Ball St, Plattsburgh, NY 12901	Mobile home residential
24 Ball St, Plattsburgh, NY 12901	Mobile home residential
24 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
24 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
24 Redwood St, Plattsburgh, NY 12901	Mobile home residential
25 Ball St, Plattsburgh, NY 12901	Mobile home residential
25 Redwood St, Plattsburgh, NY 12901	Mobile home residential
26 Ball St, Plattsburgh, NY 12901	Mobile home residential
26 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
26 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
26 Redwood St, Plattsburgh, NY 12901	Mobile home residential
27 Ball St, Plattsburgh, NY 12901	Mobile home residential
28 Ball St, Plattsburgh, NY 12901	Mobile home residential
28 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
28 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
28 Redwood St, Plattsburgh, NY 12901	Mobile home residential
29 Gregory Ln, Plattsburgh, NY 12901	Mobile home residential
3 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
3 Ball St, Plattsburgh, NY 12901	Mobile home residential
3 Birch St, Plattsburgh, NY 12901	Mobile home residential
3 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
3 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
3 LeClair Cul De Sac, Plattsburgh, NY 12901	Mobile home residential
3 Redwood St, Plattsburgh, NY 12901	Mobile home residential
3 Side St, Plattsburgh, NY 12901	Mobile home residential
30 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
30 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
32 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
32 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
34 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
34 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
36 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
36 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
38 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
38 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
4 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
4 Ball St, Plattsburgh, NY 12901	Mobile home residential
4 Birch St, Plattsburgh, NY 12901	Mobile home residential
4 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
4 Redwood St, Plattsburgh, NY 12901	Mobile home residential
4 Side St, Plattsburgh, NY 12901	Mobile home residential
40 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
40 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
42 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
42 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
43 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
4398 Route 22, Plattsburgh, NY 12901	Mobile home residential
44 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
44 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
44 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
45 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
46 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
46 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
47 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
48 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
48 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
48 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
49 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
5 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
5 Ball St, Plattsburgh, NY 12901	Mobile home residential
5 Birch St, Plattsburgh, NY 12901	Mobile home residential
5 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
5 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
5 LeClair Cul De Sac, Plattsburgh, NY 12901	Mobile home residential
5 Redwood St, Plattsburgh, NY 12901	Mobile home residential
5 Side St, Plattsburgh, NY 12901	Mobile home residential
50 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
50 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
51 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
52 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
52 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
53 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
54 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
54 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
55 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
56 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
56 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
58 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
6 Ball St, Plattsburgh, NY 12901	Mobile home residential
6 Birch St, Plattsburgh, NY 12901	Mobile home residential
6 Debra Ln, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
6 Redwood St, Plattsburgh, NY 12901	Mobile home residential
6 Side St, Plattsburgh, NY 12901	Mobile home residential
60 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
62 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
64 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
66 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
68 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
7 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
7 Ball St, Plattsburgh, NY 12901	Mobile home residential
7 Birch St, Plattsburgh, NY 12901	Mobile home residential
7 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
7 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
7 LeClair Cul De Sac, Plattsburgh, NY 12901	Mobile home residential
7 Redwood St, Plattsburgh, NY 12901	Mobile home residential
7 Side St, Plattsburgh, NY 12901	Mobile home residential
70 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
72 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential

Table 1

Contact List



Address	Use
74 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
74 Pleasant Ridge Rd, Plattsburgh, NY 12901	Mobile home residential
76 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
78 Pleasant Ridge Rd, Plattsburgh, NY 12901	Mobile home residential
8 Aspen Ct, Plattsburgh, NY 12901	Mobile home residential
8 Ball St, Plattsburgh, NY 12901	Mobile home residential
8 Birch St, Plattsburgh, NY 12901	Mobile home residential
8 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
8 Haniko Ln, Plattsburgh, NY 12901	Mobile home residential
8 Quality Dr, Plattsburgh, NY 12901	Mobile home residential
8 Redwood St, Plattsburgh, NY 12901	Mobile home residential
8 Side St, Plattsburgh, NY 12901	Mobile home residential
82 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
84 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
86 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
88 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
9 Chasands Dr, Plattsburgh, NY 12901	Mobile home residential
9 Debra Ln, Plattsburgh, NY 12901	Mobile home residential
90 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
92 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
94 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
96 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
97 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
98 Abenaki Rd, Plattsburgh, NY 12901	Mobile home residential
2 Susan Ln, Plattsburgh, NY 12901	Mobile home residential
1 LeClair Cul De Sac, Plattsburgh, NY 12901	Mobile home residential
2 Superior Dr, Plattsburgh, NY 12901	Mobile home residential



APPENDIX B

PUBLIC MEETING NOTICE (ENGLISH)



YOU ARE INVITED

Public Meeting

January 29, 2025 at 6:00 PM

UMR Boards Production LLC - Title V Air Permit Application

UMR Boards Production, LLC (UMR) has submitted an application to the New York State Department of Environmental Conservation (DEC) for a Title V Air Permit for the existing Schluter Facility, and for the newly proposed KB4 Facility. Additionally, the applicant has applied for a State Pollutant Discharge Elimination System (SPDES) Individual Permit for the proposed KB4 Facility. An Enhanced Public Participation Plan has been developed in accordance with DEC Commissioner Policy 29, *Environmental Justice and Permitting* (CP-29). The purpose of this meeting is to inform the public about the project and to engage and involve the community early in the Title V Air Permit Application review process.

To Attend the In-Person Meeting:

The meeting will be located at:

Town of Plattsburgh Offices

151 Banker Road

Plattsburgh, New York 12901-7301

Agenda:

- Project Overview
- Background
- Scope of work
- Project schedules
- Community Impacts
- Proposed Mitigation Measures
- Questions and Answers

Your Attendance is Important!

Project personnel will be available to answer questions from the community. For additional information on the proposed project:

- Contact: Edward Davidson by phone at 518-782-0882 or by email at edavidson@jmt.com.
- Visit the repository at: <https://feature.jmt.com/umr-boards-production> or at the Town of Plattsburgh Offices.

Contact the project liaison to request reasonable accommodation for a disability or interpreter services in a language other than English, so that you can participate the meeting(s) and/or to request a translation of any of the event documents into a language other than English.



APPENDIX C

**FACT SHEET
(ENGLISH)**



UMR Boards Production LLC - Title V Air Permit **Application Fact Sheet**

- **Project:** Title V Air Permit Application
- **Applicant:** UMR Boards Production, LLC
- **Facilities:** UMR Boards Production, LLC (UMR) and Schluter Systems LP (SSLP) are existing facilities located on 194 Pleasant Ridge Road in Plattsburgh, Clinton County, New York. Schluter Systems, LP is also proposing a new KB4 Facility which will be located on an adjacent parcel with a street address of 26 Irish Settlement Road in Plattsburgh, Clinton County, New York
- **DEC Application Number:** 5-0942-00510/0004
- **An Enhanced Public Participation Plan (EPPP) has been developed in accordance with DEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29)**

What is the Proposed Project?

The Proposed Project will allow for:

- Consolidation of two existing manufacturing areas, UMR and SSLP, under a single Title V Air Permit instead of multiple Air State Facility Permits/Registrations. The two existing manufacturing areas, located within the Schluter Facility, will be considered under “common control.”
- Installation of a new production machine into UMR.
- Installation of a new emissions and pollution control system to capture and reduce volatile organic compounds (VOC’s) from the Schluter Facility.
- Construction and operation of a newly proposed KB4 Facility which is anticipated to replace SSLP’s existing Kerdi-Board production.

The improvements to the Schluter Facility and the proposed KB4 facility are under review and the subject of this Enhanced Public Participation Plan (EPPP). To implement the proposed project, UMR has submitted an application for Title V Air Permit to the New York State Department of Environmental Conservation (DEC), which could result in the issuance of a Title V Air Permit covering the current and ongoing operations at Schluter Facility, and the operations of the proposed KB4 Facility. The applicant has submitted additional associated applications to the DEC for State Pollutant Discharge Elimination System (SPDES) coverages for the proposed KB4 Facility, including the onsite wastewater treatment system. Critically, the proposed KB4 Facility will augment and/or replace SSLP’s existing Kerdi-Board production operations, resulting in fewer emissions at KB4 than for the manufacture of the same product at SSLP. The purpose of this fact sheet is to inform the public about this proposed project and to involve the community during the DEC permit review process.

Why does UMR need to apply for DEC Permits?

DEC requests that UMR bring two existing facilities (Schluter Systems LP and UMR Boards Production, LLC) under common control and incorporate the proposed KB4 Facility through a Title V Air Permit instead of separate State Air Facility Registrations or Permits.

The proposed KB4 Facility also requires authorizations for stormwater, sanitary, and water treatment



backwash discharges under DEC's SPDES Individual Permit program.

How might the project affect the surrounding community?

The surrounding community will not be negatively affected by the consolidation of existing facilities under a single air emissions permit. In fact, the proposed installation of the emissions and pollution control system at the Schluter Facility and development of the proposed KB4 Facility will significantly reduce facility emissions of VOCs, resulting in fewer VOC emissions than allowed by the permit currently.

The installation of the new production machine in UMR is to accommodate anticipated market-based increases in production, and emissions from this source are expected to increase as production increases. However, there will be a net reduction in VOC emissions but an increase in for comparison purposes greenhouse gases, as they will largely be captured by the proposed emissions and pollution control system unit. The installation of the emissions pollution control system, and the construction of KB4 may result in some limited, short-term construction impacts.

The KB4 project may also lead to additional energy demands, minor changes in traffic patterns with an anticipated annual vehicle trip increase of approximately 2% along CR-32 and an overall reduction in on-site vehicle traffic, and limited visual impacts. The onsite wastewater treatment system will be sized appropriately to prevent any surface or groundwater impacts.

How can I participate in the permit review process?

- Attend the upcoming in person public meeting scheduled for January 29, 2025, at 6:00 PM to learn about the project, ask questions and/or express concerns about the project.
- Ask questions, express concerns, provide input or submit by comments in writing, by phone or email to the project contact person identified below.

Where can I get more information about the proposed project?

- Visit the online document repository at: <https://feature.jmt.com/umr-boards-production> or the physical document repository at the Town of Plattsburgh offices to obtain application materials, relevant documents, and information about the project.
- Contact Edward Davidson by phone at 518-782-0882 or by email at edavidson@jmt.com for information on the project, instructions on how to attend the upcoming public meetings, or to find out about the status of the permit application and public comment period.

Who is responsible for reviewing the Permit Application?

Staff at the DEC Region 5 office located at 1115 NYS Route 86, P.O. Box 296, Ray Brook, NY 12977-0296, are responsible for reviewing and issuing the required permits. Tel: (518) 897-1234; email: DEP.R5@dec.ny.gov



APPENDIX D
PERMITTING HISTORY AND FACILITY SUMMARY
NARRATIVE

PERMITTING HISTORY & FACILITY SUMMARY NARRATIVE

This application is submitted by UMR Boards Production, LLC, (UMR) for an industrial facility located at 194 Pleasant Ridge Road, Plattsburgh, Clinton County, New York 12901. (See Figures 1 & 2.)

The facility includes several buildings and operations as well as a planned new building and operation. Within this existing facility, UMR manufactures shower trays. Schluter Systems L.P. (SSLP) manufactures a bathroom construction product known as Kerdi-Board, as well as some other ancillary products. Because of the proximity of the UMR and SSLP facilities to each other, and because of the similar industries they are in, they are both subject to the Title V Air Permit Application under review. SSLP also seeks to move its Kerdi-Board operations to a new facility, known as KB4, in a new building located near the existing UMR and SSLP operations. UMR and SSLP are seeking a Title V Air Permit from the New York State Department of Environmental Conservation (DEC) to cover the combined air emissions from the existing UMR and SSLP operations, as well as the KB4 facility. The application also includes the installation of an emissions control device, as well as an eighth molding machine in the existing UMR operation.

The subject facilities consist of buildings housing UMR which manufactures molded expanded polystyrene (EPS) shower floors (shower trays) and SSLP which manufactures laminated extruded polystyrene (XPS) foam core material (Kerdi-Board) for shower and tub surrounding walls and shaped parts such as benches, niches and curbs. Separate buildings house a packaging plant for thinset mortar (Thinset), a research and development (R&D) facility, the headquarters office, and associated warehousing. Each is described in more detail below.

UMR's OPERATIONS

UMR's EPS manufacturing process uses polystyrene beads, which contain pollutants known as pentane and isopentane as the "blowing agent." In conjunction with applied heat, the blowing agent facilitates the expansion component of the manufacturing process. In principle, the EPS process used by UMR is the same manufacturing process used to produce everyday foam packaging for use in the shipment and distribution of common consumer goods.

UMR receives shipments of polystyrene beads inside supersacks that undergo a pre-expansion process to soften and expand the beads which are then transferred to a silo room for a process known as "aging." After aging, the pre-expanded beads are transferred to molding machines where higher temperature and moisture provided by one 10.04 MMBtu steam boiler completes the manufacture of the material into EPS, and simultaneously applies face sheets to it. The face sheet material is cut to fit the molded products with a laser cutting machine, which is a trivial activity that does not require a permit, but the emissions are included in this Title V Air Permit Application. After molding, the material is transferred to drying chambers to remove residual moisture, packaged, and then transferred to the nearby warehouse as inventory prior to being shipped to retailers or wholesalers.

UMR has seven molding presses and seven hot water drying chambers all heated by the same 10.04 MMBtu steam boiler which generates heat for the molding process described above, which

is subject to state and federal regulations. UMR is proposing to add an eighth molding press as part of this application.

The Title V Air Permit Application includes the potential regulated emissions resulting from all of these activities.

SSLP'S OPERATIONS

SSLP operates a facility known as KB3, which is located “adjacent to” the UMR facility for purposes of air permitting. (See Figures 1 & 2.) This means that the KB3 operation is close enough to UMR, and engages in a similar line of business, such that the law calls for reviewing the emissions from the two companies as though they were a single source. SSLP operates a laminating line to apply face sheets to a foam core to produce Kerdi-Board. The face sheets are applied with hot melt polyurethane moisture cure adhesive (hot melt adhesive, similar to that used in a “hot glue gun” for household crafts and DIY projects). The hot melt adhesive is melted in electric drums at the SSLP facility prior to use in the manufacturing process.

The foam core of the Kerdi-Board is an extruded polystyrene (XPS) that is delivered to the facility in bulk rolls and stored in the SSLP facility prior to use to age the material to ready it for production. The foam core material is fed into a hot Thermofix press, which is heated with a 0.8 MMBtu natural gas oil heater which expands the foam and converts it from roll to board form before entering into the laminating equipment.

In the laminating equipment a liquified adhesive (“hot glue”) is applied to the top and bottom surfaces of the expanded foam core and face sheet material is immediately applied and then passed through a cold Thermofix unit that completes the curing of the adhesive. The adhesive cures rapidly upon exposure to ambient air and moisture, so the drum melters and pumping equipment used to deliver the adhesive are closed units that effectively limit release of vapor. The adhesive is only exposed briefly to the atmosphere at the point where it is applied to the foam core board. The laminated board then passes through a flexographic printing unit that prints product information and grid lines on one side of the laminate before the laminate is passed through a cutting machine to cut boards to standard dimensions.

A portion of the finished board stock is packaged and transferred to a nearby warehouse, while the rest of the material is cut and milled to smaller sizes and assembled into shaped products. This secondary production has smaller liquified adhesive pail melters, which are used to apply adhesive to cut joints and assembled immediately into a finished product, which is ultimately used for the installation of features, such as shower niches and benches.

SSLP operates the Thinset mortar packaging operation at the facility. Bulk sand and cement are delivered to the plant by truck and pneumatically transferred to silos. Smaller quantities of additives are delivered to the plant in either bulk material bags or small packages. Measured amounts of sand, cement and additives are mixed and packaged in 50-pound bags. This equipment is enclosed in the Thinset plant, however, the dust collection system exhausts to the outside through particulate filters. The Thinset operation is an exempt activity which would not require a permit

on its own, although it is included in the Title V Air Permit Application materials to gather its emissions into the total emissions resulting from the facility.

SSLP also converts and packages various metal and plastic trim parts to support shower and bathroom construction projects and conducts research and development for new and improved products.

The KB3 facility has one solvent cleaning station in the machine shop. The Title V Air Permit Application includes the potential regulated emissions resulting from all of these activities.

OTHER EXISTING FACILITIES & EMISSIONS CONTROLS

UMR and SSLP are in the process of acquiring and installing a regenerative thermal oxidizer (RTO) to control volatile organic compound (VOC) emissions from the UMR and SSLP emission units. The RTO will significantly reduce VOC emissions over the current condition. This application seeks a permit condition requiring the operation of the RTO to control VOC emissions at all times.

Both SSLP (KB3) and Thinset manufacturing processes generate dust. The facility uses local and central particulate control devices to keep the work environment dust free and to limit emissions of dust to the atmosphere. The facility emissions of particulate matter on a potential to emit (PTE) basis have been calculated at 14.6 tons per year (tpy) and do not exceed applicable permit limit thresholds for particulate matter (50 tpy for Air State Facility and 100 tpy for Title V), and based on particulate matter alone the facility would qualify for a minor Air Facility Registration, an action exempt from New York State Environmental Quality Review Act (SEQRA) and considered protective of human health. However, emissions from the centralized dust control system are subject to the Part 212 particulate emissions rate limit of 0.05 grains per dry standard cubic foot.

The facility also conducts research and development, such as material testing and inventing new products, as well as troubleshooting issues encountered by installers of the various UMR and SSLP products. The R&D activity is not designated as an emission unit because the only regulated emissions are from the exempt boilers (described below).

Finished goods from SSLP and UMR are transferred to onsite warehouses where inventory is maintained prior to shipping products to market. Material is moved from the processing areas to the warehouses and within the warehouses with propane- and electric-powered forklifts. Warehousing is not a separate designated emission unit in the permit application, as it has no regulated manufacturing process emissions.

THE KB4 FACILITY

The application also includes a new facility, the Kerdi-Board Line 4 (KB4) facility. This facility will be constructed and ultimately will house a new updated version of SSLP's current Kerdi-Board manufacturing line using a lower emission technology. Upon commissioning of the proposed KB4 emission unit, production of Kerdi-Board will begin transitioning from the SSLP (KB3) emission unit to the KB4 emission unit. The KB4 emission unit includes equipment for the

manufacture of Kerdi-Board from polystyrene resin as well as the laminating and board finishing processes. As a result, the SSLP KB3 laminating operations and the use of XPS foam rolls will be phased out completely as the KB4 operations ramp up to full capacity.

The XPS resin is a solid at room temperature. The extrusion equipment heats the resin to a liquid state. Metered quantities of carbon dioxide, hydrofluoroolefin, and dimethyl ether are injected into the liquid resin as blowing agents inside the extrusion equipment. This process results in a fraction of the VOC emissions compared to the KB3 manufacturing process. With this lower VOC content, there is a much lower PTE and much lower actual annual emissions of VOC than the SSLP KB3 process currently in operation.

Once the foam core has been extruded, the subsequent KB4 board laminating and board finishing processes are essentially the same as the those described for KB3 including the post processing of material that is cut and milled to smaller sizes and assembled into shaped products.

The emissions resulting from KB4 are described in the Title V Air Permit Application.

COMBUSTION & GREENHOUSE GAS EMISSIONS - EXISTING AND PROPOSED SOURCES

The Title V Air Permit Application includes a “combustion emission unit” which includes all of the facility combustion units, i.e., equipment that burn fuel. The combustion emission unit emissions include exempt combustion sources such as diesel-powered emergency generators and sprinkler pumps, space heaters, and small boilers (each with a power rating less than 10 MMBtu per hour) located in the warehouse areas and R&D facilities. The combustion emission unit also includes the proposed RTO that will control VOC emissions from processes within the UMR and SSLP emission units.

The facility has several greenhouse gas-emitting features as part of its operation. This includes: four (4) boilers for comfort heating and parking lot ice melt (each emitting less than 10 MMBtu per hour); space heaters for comfort heating; three (3) fire suppression pumps that service all buildings on campus, including Thinset and R&D; five (5) emergency generators powered by natural gas or diesel; and a number of propane-powered forklifts. The generators and fire pumps, and their associated bulk fuel storage are present at various locations around the facility

The UMR and SSLP building has one shared diesel-powered emergency generator.

The Thinset building has one natural gas-powered emergency generator.

The R&D building has one primary and one backup (each 0.264 MMBtu) exempt gas-fired boilers for comfort heating and ice and snow melt, and a diesel-powered emergency generator.

The warehouse building has an exempt gas-fired boiler (0.096 MMBtu) for floor heating and one diesel-powered emergency generator. Additionally, the shipping and receiving areas of the warehouse have ice and snow melt heating powered by a gas-fired boiler (2.5 MMBtu.)

The headquarters office building is heated with geothermal and has a gas-fired emergency generator.

The proposed combustion sources for KB4 includes eight (8) supplementary comfort heat boilers (Cleaver Brooks CFLC boilers), each with a heat rating of 8 million Btu/hr. The facility anticipates the need for seven (7) supplementary boilers and plans on installing the eighth boiler for redundancy. The principal comfort heat source for the proposed KB4 facility will be electric heat pumps. The boilers would only be used in case of temperatures at or below 10°F, to supplement the geothermal and electric heating system (heat pumps), and during power outages. The need for supplementary boilers is primarily necessitated by the fact that the efficiency and heating capability of electric heat pumps is drastically reduced at particularly cold temperatures, a current engineering limitation of the technology. The facility anticipates the need for five (5) emergency backup generators. KB4 will not use any combustion sources as part of manufacturing processes.

All of these GHG emitting features are activities that on their own do not require a permit, but are included in this Title V Air Permit Application both to capture all emissions, and also for the New York State Climate Leadership and Community Protection Act (CLCPA) greenhouse gas evaluation.

PERMITTING HISTORY

UMR holds a New York State air facility permit issued by the DEC for processes related to the production of its EPS products. DEC issued Air State Facility permit number 5-0942-00510/00001 to UMR with a production that caps VOC emissions below major source levels. This permit was issued June 28, 2018, and was last modified in 2019 to add a laser cutting operation (described above) and to add/modify emission points. The revised permit was issued July 24, 2019.

SSLP acquired its current facility from UMS Manufacturing, LLC (UMS Manufacturing or UMS). In 2009, UMS Manufacturing constructed and, in April 2010, began operation of a plant for manufacturing and assembling ceramic tile underlayment products at the facility in the area that is today SSLP's operations. UMS did not seek an air permit or registration from DEC until November 7, 2019, when it submitted an Air Facility Registration to DEC. UMS was dissolved by merger with SSLP effective January 3, 2020. SSLP promptly sought to come into compliance and first sought to transfer UMS's pending application to SSLP. SSLP then submitted an application for an Air Facility Registration on April 10, 2020. The application was not acted upon by the DEC.

To address the years of non-compliance under UMS's ownership, and SSLP's acquisition of a facility that did not have a DEC air permit or registration, SSLP, UMR and UMS entered into an Order on Consent that allowed for DEC oversight of ongoing SSLP and UMR operations. The Order on Consent also requires the facility to come into compliance via submission of a Title V Air Permit Application, including the necessary SEQRA analysis pursuant to the CLCPA studies and other documentation.

The subject Title V Air Permit Application was timely submitted on June 9, 2023. SSLP and UMR have worked with the Department since that date to further refine and update the Title V Air Permit Application such that it is determined complete and ready for public review. DEC has issued five

(5) Notices of Incomplete Application (NOIA). This submission has been made in response to the 5th NOIA, dated September 27, 2024. It is anticipated that DEC will provide further comments, if any, and a public meeting will be held pursuant to the Enhanced Public Participation Plan.

Critically, on April 26, 2024, SSLP submitted an application for a New York State Air Facility Registration for the KB4 facility, as the emissions with the KB4 technology would qualify it for a registration instead of a permit. DEC determined that the best course of action to effectively review the permitting of the existing UMR and SSLP facility, including the installation of the RTO and the eighth molding press, as well as the nearby proposed KB4 facility was to review all of these components under the current, pending Title V Air Permit Application. SSLP and UMR have submitted the updated materials to bring the KB4 facility into the pending UMR and SSLP application.