

Peckham Industries proposal would bring 600,000 tons of Construction and Demolition debris for a landfill to a property on the shoreline of the Hudson River.

In October 2019, the New York State Department of Environmental Conservation (NYSDEC) received an application from Peckham Industries, Inc. -- the owner of a portion of the former Holcim Cement Plant in the Town of Catskill -- for a Part 360 solid waste permit. The permit would allow Peckham to import 600,000 tons (that's 1.2 billion pounds) of construction and demolition (C&D) debris waste **to make a landfill** from the alteration, construction, destruction, rehabilitation, or repair of buildings, industrial or commercial facilities, and roadways. Peckham claims this proposed project does not require liners creating the potential risk of an **unlined landfill** only a few hundred yards from the Hudson River. Contaminants present in any of the C&D loads would likely not be contained and would reach the Hudson River, wetlands and surrounding area through rainfall and flooding, runoff and groundwater.

#1: PECKHAM BOASTS OF BEING A LOCAL COMPANY THAT CARES ABOUT THE CATSKILL COMMUNITY.

Peckham Materials is a part of Peckham Industries, a large corporation with approximately 27 locations throughout the Northeast and corporate headquarters in White Plains, NY. Just last year, Wheelabrator Technologies proposed trucking 445,000 tons of toxic incinerator ash per year for 48 years to dump in the quarry 1500 feet from the Hudson River at a neighboring Peckham site west of Route 9W. Community opposition blocked the plan, but it is clear that Peckham is willing to host polluting projects.

#2: PECKHAM MAINTAINS THAT NOISE FROM THEIR OPERATION CAN BE HEARD FROM ACROSS THE RIVER IN GERMANTOWN AND THAT THEIR PROPOSED 40 FOOT HIGH C&D DEBRIS BERMS WILL PROVIDE A NOISE, DUST AND VISUAL SHIELD.

Citizens in Germantown will tell you that they can't hear any noise from the on-shore Peckham facility where the berms would be. They can hear barges' loading and unloading operations at the end of the jetty. The current proposal would only increase barge use. Peckham has not proposed a berm around their Athens asphalt plant which is closer to houses than the Holcim site.

#3: PECKHAM INDUSTRIES IS ESTABLISHING A PERFORMANCE BOND OF \$1.3 MILLION DOLLARS "TO TAKE CARE (OF ANY ISSUES) SHOULD SOMETHING HAPPEN TO ALL OF OUR PROTOCOLS."

But the cost associated with an unforeseen environmental clean-up event could be many times greater than that. How did Peckham decide on the \$1.3 million dollar value, and who would control the performance bond?

#4: DURING PECKHAM'S PRESENTATION AT THE TOWN OF CATSKILL PLANNING BOARD MEETING ON NOVEMBER 26, 2019, THEY STATED THAT THEIR PROJECT WOULD TURN TEN ACRES OF INDUSTRIAL LAND INTO GREEN SPACE, ESSENTIALLY STERILIZING TEN ACRES OF AN INDUSTRIAL FACILITY THROUGH BUILDING BERMS FROM C & D.

C&D sometimes contains other materials laced in, including lead and asbestos. The project itself would contaminate the site permanently. This site was also the location of the former multinational corporation LaFargeHolcim's former cement plant and the St. Lawrence Cement Factory before that. It has been damaged with vast quarries and multiple kiln ash landfills that have been left behind. The leachate from kiln ash landfills is highly acidic. The cumulative impacts of the past are unknown and have never been assessed or fully remediated. A study to include baseline testing and an assessment of existing conditions, soil, surface water and groundwater, plus samples from downward leachings draining into this proposed area should be required before Peckham considers bringing in any additional materials. A study of cumulative impacts from all past industrial activity on the properties must be undertaken before any additional permits are granted.

#5: DURING PECKHAM'S PRESENTATION AT THE TOWN OF CATSKILL PLANNING BOARD MEETING, THEY SAID THAT C&D DEBRIS WASTE WOULD NOT BE TRUCKED INTO THE SITE.

In their application, the company references possible future trucking to Catskill. "... If truck delivery becomes an option Peckham will discuss and present the change in delivery method to the NYSDEC at the appropriate time. Trucking material from Peckham-owned facilities ... could be delivered to the site by truck."

#6: PECKHAM SAYS THAT THEY WILL ONLY ACCEPT RECOGNIZABLE, UNCONTAMINATED, CONCRETE, ASPHALT, ROCK, BRICK AND SOIL (RUCARBS) FROM TWO REGISTERED FACILITIES, THE INWOOD WASTE TERMINAL IN INWOOD, NASSAU COUNTY, NEW YORK AND/OR THE ALLOCCO WASTE FACILITY IN BROOKLYN, NEW YORK.

During their November 2019 presentation, Peckham said that they may also consider other sources of waste in the future that "...meet the criteria for acceptance."

#7: PECKHAM MATERIALS SAYS THAT ALL OF THE C&D DEBRIS WASTE WILL BE TRANSPORTED BY BARGE AND DELIVERED TO THE EXISTING JETTY THAT EXTENDS EAST OF DUCK COVE.

The New York Department of State's (NYDOS) Coastal Fish and Wildlife Rating Form describes Smith's Landing as a popular area for recreational fishing, boating, and picnicking by county residents. The existing history of sensitive wetlands in the surrounding area documented in this NY DOS Rating form indicates that any activity in this location could degrade water quality, increase turbidity, increase sedimentation, or alter flows, temperature, or water depths could result in significant impairment of the habitat. An assessment of any new proposal must address potential impacts to shoreline habitat and human enjoyment of it.

#8: PECKHAM SAYS THAT THE RUCARBS MATERIAL THAT THEY WILL ACCEPT WOULD HAVE BEEN TESTED AT THE SOURCE. UPON ARRIVAL IN CATSKILL ONLY ONE (1) IN EVERY TEN (10) BARGES WOULD BE SAMPLED. OTHERWISE, TRAINED EXPERTS WOULD REVIEW THE ANALYTICAL DATA AND PROVIDE VISUAL SCREENING TO ASSESS THE QUALITY OF MATERIALS.

Visual screening may be useless, as contaminants such as lead, asbestos, organic compounds, pesticides, PCBs, etc. are not visible to the naked eye. Checking only one out of ten barge loads is not enough.

#9: IN ITS APPLICATION, PECKHAM STATES THAT IT OWNS A PORTION OF THE FORMER LAFARGEHOLCIM CEMENT PLANT SITE THAT WAS TRANSFERRED TO THEM IN 2013.

The title of lands and liability is vague and poorly delineated in their application. It is critical for the Town of Catskill and NYSDEC to require clear tax maps to understand who owns the balance of the St. Lawrence Cement site and who is the responsible party.

#10: IT IS UNKNOWN WHETHER OR NOT PECKHAM MATERIALS WILL APPLY FOR ANY PUBLIC FUNDING THROUGH GRANTS OR TAX INCENTIVES FOR THIS PROJECT.

Meanwhile, Joseph Wildermuth, VP of Peckham Industries, serves as a regional representative of the Capital Region Regional Economic Development Committee (REDC) who awards Consolidated Funding Application (CFA) grants in the Capital region.

KEEP IT GREENE! NEEDS YOUR HELP TO OPPOSE THIS RISKY PROJECT. HELP STOP A DUMP ON THE HUDSON RIVER SHORELINE.

The next stage for properties impacted by quarries must be remediation not additional dumping. Burying 600,000 tons of C&D debris that may contain toxic materials sets a dangerous precedent for the Hudson River shoreline

1. Contact **Catskill Town Supervisor Dale Finch** at DFinch@townofcatskillny.gov and **NYSDEC Region 4 Patrick Connally** at Patrick.Connally@dec.ny.gov and tell them that you are opposed to the Peckham proposal.

2. Contact **NYSDEC Region 4 Patrick Connally** at Patrick.Connally@dec.ny.gov and tell him that as a stakeholder in the proposed Peckham Industries Proposal, you would like to be listed as an **Interested Agency** in the **State Environmental Quality Review (SEQR)**.