

New York State Department of Environmental Conservation,

Saratoga Biochar's proposed facility raises many environmental concerns, including air emissions of nitrogen dioxides, the persistence of PFAS and other contaminants in the final biochar product, potential spills, and impacts of noise and odor. This situation is particularly troubling because Saratoga Biochar Solutions has never built or operated such a plant, and the technology needed to safely use biosolid human waste as a feedstock is not widely accepted.

Biosolid waste contains PFAS, which are toxic "forever chemicals" that do not break down under natural conditions. Although the Saratoga Biochar Solutions executive team assures us that the pyrolysis process used in the plant will break the PFAS bonds, a [2021 research brief issued by the EPA](#) says more research must be done to verify that pyrolysis can break apart the chemicals. PFAS are associated with serious health risks, including cancer, developmental delays in children, and decreased fertility.

The town of Moreau is bordered to the north by Glens Falls and to the east by Hudson Falls. Both Glens Falls and Hudson Falls are recognized by NYSERDA as disadvantaged communities that have significant environmental justice concerns. The addition of the Saratoga Biochar facility in Moreau would undoubtedly have a negative impact on these already disadvantaged populations because environmental pollutants travel easily by air, soil, and water to areas outside the immediate location of contamination. The additional inbound truck traffic and their contents will also adversely impact the air quality and result in noise and odor pollution. This area of Upstate NY already faces environmental injustice including direct exposure to pollutants through the GE superfund site where PCBs contaminated the Hudson River, the Wheelabrator waste management service, and a number of other large industrial sites.

DEC should not issue the air and solid waste permits to Saratoga Biochar without 100% certainty that the people who live and work near the proposed facility will not be adversely affected.

Sincerely,



Kelsey Trudell, Executive Director



Board of Directors: Amy Durland (Chair), Anne Ernst, Laura Faulk, Sarah Goodwin, Elaine McArdle (Vice-Chair), Harry Moran, Paul Murphy (Treasurer), Richard Romano (Secretary), David Sayer, David Washburn