EXHIBIT

PWC-603A

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James Powell, QEP Director, Emerging Solutions Mostardi Platt

Proposed LRS West DuPage Recycling and Transfer Station Project Criterion 2

January 16, 2023

702 W. 48th Avenue Unit A Denver, CO 30216 289-802-8855

HQ - Elmhurst, II. | Chicago, II. | Grown Point, IN | Concord, NC | Mendota Haights, MN

1

Jim Powell, QEP Background

- MS Environmental Engineering University of Florida
- Environmental Engineer Over 40 Plus Years of Siting and Permitting Assistance
 - Current Position: Director, Emerging Solutions, Mostardi Platt
- Testified regarding Criterion 2 or similar before IEPA, OEPA, IDNR
 - How many times -- three
- Evaluated Impact of Projects on Environmental Justice
 - Six times in the past five years

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Criterion 2:

"the facility is so designed, located, and proposed to be operated that the public health, safety, and welfare will be protected"

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3

LRS Website Information -- Proposed Waste Transfer Station https://www.lrsrecycles.com/west-dupage-transfer-station/

	Reduced Miles	Reduced Miles	Reduced Fuel Usage	Reduced Emissions
LES LES	(Per Year)	(Over 20 year Operating period)	(Gallons over 20 year operating period)	(Pound of CO2 over 20 year operating period)
LRS MSW Collection Vehicles	75,000	1.5 million	425,000	9.51 million
Other Collection Vehicles	40,000	800,000	230,000	5.15 million
Hydro Vehicles	685,000	13.7 million	3.914 million	87.60 million
Total	800,000	16 million	4.569 million	102.26 million
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Public Health, Safety, and Welfare

- EPA has established ambient air quality standards to protect the public health and welfare.
 - Modeling used to quantify project impacts on existing air quality throughout the potentially impacted region.
- Impacts on health and welfare have not been <u>fully</u> addressed in submittal for this site.
- Key component of health and welfare assessment include assessment of impacted areas.

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5

5

Areas Evaluated

• As they relate to public health, safety and welfare protection:

oTraffic Data,

OAir quality (community and worker exposure), and

oImpact of above on the community

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6

Emissions Reduction Issue from Slide Four

- Apparently based upon Collection vehicles only.
- Does not take into account increase in Transfer vehicles.
- Apparently Looks only at reduction in emissions within DuPage County.
- No discussion about increase in emissions in Kane County.
- Only looks at CO₂ emissions not Particulate (PM_{2.5}, PM₁₀) or Nitrogen Oxides (NO_x).
- Could not find any supporting calculations to document slide four

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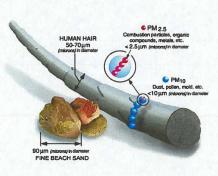
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7

7

Air Quality Impact Related to Vehicle Traffic

- Are you aware of the specific particulate emission?
 - EPA has measured and estimated emissions of both PM_{2.5} and PM₁₀ from various trucks including those proposed for this project.
- PM_{2.5} particulate <2.5 microns, primarily produced by combusting fuel.
- PM₁₀ particulate <10 microns, produced by construction activities and roadway dust, brakes, and tire wear.



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Health Impacts of Diesel Pollution

- Diesel-powered vehicles, vessels, locomotives, and equipment account for:
 - o Over 60% of all nitrogen oxides (NOx), and
 - o Over 70% of all fine particulate matter (PM_{2.5}) emissions from US transportation sources.
 - o Over 80% of all ultra fine particulate matter (PM_{<0.1})

Cancer-causing Pollutants in Diesel Exhaust

Diesel Emissions % of all Mobile Carcinogen Status

Pollutant 1989⁶¹

Formaldehyde 52% probable 1 in a million
Acetaldehyde 59% probable 2 in a million
Butadlene 8% probable 2 in a million
Acrotein 50% possible n/a
Benzene 5% known 2-8 in a million
Diesel Particulate 77% probable⁶³

EPA: 12 to 1210 in a million
Matter

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Diesel particles are carbon at their core with toxics and carcinogenic substances attached to their surfaces.

Toxics

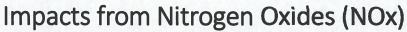
Metals

Secondary Sulfate and Nitrate

Organic Carbon Compounds

Elemental Carbon Core

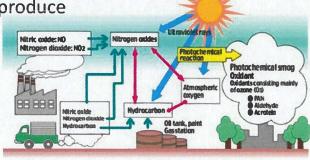
9



• Heavy duty diesel vehicles also produce significant NOx emissions.

 EPA regulates exposure to NOx emissions due to the potential of respiratory health impacts:

 Both short- and long-term exposure



• Long-term/Short-term exposure to NOx directly linked to the development of asthma or asthmatic symptoms.

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Key Features Being Evaluated

- Proximity of Proposed Site to Conflicting Neighboring Uses:
 - oResidential Property, Traffic Related to Operations (Trucks)
- Impact upon Air Quality

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11

11

Air Quality Impact Analysis Performed

- Used USEPA- and IEPA-approved model methodologies and input data.
- Traffic mix / peak and max hourly data from applicant.
- Resulting impacts upon people within LRS service area.

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Trucks to and from Proposed Site

"Projected Material Processing and Traffic Volume"

- Sources of Traffic Data
- Criterion 2:
 - oTable 2-1,
 - oTable 2-2,
 - oTable 2-3, and
 - oTable 2-4

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13

Collection Vehicle Distributions Call Delivered Cal											Projects	d Materia	Processio	d nd Treasfe ng and Tra m or Deno	Hic Volum							Č of E	territoriana Caracian
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450 AM 1.9% 0.7% 4 12; 1 7 5 19 25 127 21 0 9 4 0 0 0 0 0 0 0 0 5 25 550 AM 2.5% 13% 5 16 2 11 7 5 9 25 41 504 40 0 7 0 0 0 0 0 0 0 0 0 5 25 550 AM 2.5% 13% 5 15 4 18 9 34 50 250 37 9 10 1 30 30 0 4 160 13 20 550 AM 2.5% 13% 5 15 4 18 9 34 50 250 37 9 10 1 30 30 0 4 160 13 20 550 AM 4.0% 2.6% 13% 5 15 4 18 9 34 50 250 37 9 10 1 30 30 0 4 160 13 20 550 AM 4.0% 2.6% 8 25 5 20 14 1 1 2 7 5 1 1 2 7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				1	4	1	3	2	8			7	0	2	0	0	0	0	0	0			44
1,000 AM 2,5% 1,1% 3 16 2 11 7 55 41 50 50 77 9 10 10 10 10 10 10 10				1	4	1	3	2	8	13		- 11	0	2	0	0	0	0	0	0	2	13	66
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950 AM																							69
1600 AM 6.0% 2.6% 13 18 5 20 18 64 181 905 105 45 31 1 300 150 0 1 380 19 31 1150 AM 5.5% 5.4% 12 33 5 22 17 60 216 10612 150 54 37 1 30 150 0 1 380 19 31 120 PM 6.5% 5.4% 12 33 5 22 17 60 216 10612 150 54 37 1 30 150 24 1 400 18 12 120 PM 6.5% 5.4% 12 13 10 24 1 400 18 12 120 PM 6.5% 5.4% 12 18 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1															1				3				45
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. 175 tons — maximum daily throughput of CAD. 4 85 in average tons per load of those unknowled directly to outdoor bunkers (8 tons per load for conserver/ bunvies and 4 tons per load for thingles). 3 is average tons per load to CAD to gloon-building for separation and processing. 28 tons — average tons of endound mark-load. 1 ton CAD — 5 cubes yeards on oitpring floor (or 400 poundscubes years). 75% — porecutage of total flooraning CAD that is recycled.	DAILY TOTALS	70,0%	30.0%	148	443	63	306	211	750	443	2216	25?	111	75	13	370	370	73	28	560	239	MAX 72	MAX 358
70% is a percentage of velocities unbinoided in C&D by floor. 30% is a percentage of clean loads unbinoided directly in outdoor storaged bunkers. 17% is percentage of clean loads unbinoided directly in outdoor storaged bunkers. 17% is percentage of clean loads unbinoided or C&D by floor than is separated and remained at MSW. 40 is rate of separation and feedings of C&D onto seveneer and sortings that (in toos per hour). 30% is percentage of one-previolables from seveneer and sortings where the control of the co	Assumptions:			750 tons = 4.85 3 20 tons = m C&D = 75% = 25% = 70% 40	is average is average is average is everage for the percents percents is percent is percent is percent is percent is percent	re daily if ge tons pe ge tons pe tons of or yards on i uge of tota uge of tota ntage of o stage of e stage of e	r load of to r load to 6 r loads r loads r loads r and fee	of C&D. hose unit C&D tip nek load. or (or 40 g C&D ti leaded it unloade floaded or ding of C	onded directly in C&D top C&D top	ing for sep cubic yard cled. ecycled (a floor. in outdoor if floor that screener as	arution a nd hauled storgage is sepora d sorting	nd proces off as M burders, ted and re fine (in to	SW).	MSW.	rete/hea	vies and 4	tons per load for	shingto).					

EE. LRS Collection Vehicle SSR Transferred Outgoing Required Tip Floor Storage Truck Volum (Hour Beginning) (trucks) (trucks) 4:00 AM 5:00 AM 0.0% 0.0% 6:00 AM 7:00 AM 8:00 AM 9:00 AM 10:00 AM 12:00 PM 1:00 PM 2:00 PM 3:00 PM 4:00 PM 5:00 PM 5:00 PM 6:00 PM 7:00 PM 8:00 PM 9:00 PM 10:00 PM 11:00 PM DAILY TOTALS 100% 0% 62 248 0 0 62 248 1239 248 1239 248 0 13.79 248 1241 MAX 35 MAX 348 76 62 is total collection vehicles per day.
250 tons = maximum daily throughput of SSR.
4 tons = average packer truck load.
18 tons = average transfer trailer load.
10 ton MSW = 10 cubic yards on tipping floor (or 200 pounds/cubic yard).
100% = percentage of incoming SSR that is sent to a MRF.
0% = percentage of incoming SSR that is not relefted saudt Biddlel off as MSW). 1/15/2023 15

15

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	-	Truck Volumes	Out	-	-	-	MSW	SSR	C&D		incor		Incoming	_		Roll-off		Packer	Roll-off	Packer	(Hour Beginning)
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54 270		20	264	600	120	5	240	0	78	1200	240	600	120	15	4	1	116	15	1.1%	17.1%	11:00 AM
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0 -2		0	831	0	0	0	647	0	184	3233	647	0	0	0	0	0	0	0			10:00 PM
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AX 54 MAX 2	A	120	831	4156	831	34.6	647	0	184	3233	647	3233	647	85	34	9	613	77	10%	90%	DAILY TOTALS
												cles.		n of MSV load. load. r load. or (or 400 re MSW p	ker truck off truck asfer traile pping floo rehicles at	MSW pac MSW roll MSW tran ards on ti neoming	approximaverage average 5 cubic y of total i	650 tons = 8 tons = 4 tons = 24 tons = on MSW =			Assumptions:
16										t	rdi Plat	Mosta									1/15/2023

Table 2-4
West DuPage Recycling and Transfer Station
Projected Material Processing and Traffic Volume
300 tags per day of Hydro Excavation Weste

Onl & Environmental Consultants, Inc.

Time	Collection Vehi	cle Distribution		Hydro Exc	avation W	aste Del	ivered		Out	going	So	lidified Tr	ansferred	Required P	
	Hour In Hydro Vac	coming Other	HydroVac	Hour Inco		Other	Total I		HydroVac	Absorbent	Hourly Tr	ansferred	Hourly Truck Amounts	Storage	
(Hour Beginning)	(trucks)	(trucks)	(trucks)	(tons)	(trucks)	(tons)	Trucks	Tons	Tons	Tons	Trucks	Tons	(trucks)	Tons	
12:00 AM			0	0	0	0	0	0	0	0	0	0	0	0	
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3:00 AM			0	0	0	0	0	0	0	0	0	0	0	0	
4:00 AM			0	0	0	0	0	0	0	0	0	0	0	0	
5:00 AM	0.0%	0.0%	0	0	0	0	0	0	0	0	0	0	0	0	
6:00 AM	2.5%	0.0%	1	7	0	0	1	7	7	4	0	0	1	- 11	
7:00 AM	2.8%	0.0%	1	8	0	0	1	8	16	8	1	20	2	4	
8:00 AM	1.3%	0.0%	1	4	0	0	1	4	20	10	0	0		9	
9:00 AM	3.2%	0.0%	1	10	0	0	1	10	29	15	1	20	2	4	
10:00 AM	8.3%	0.0%	4	25	0	0	4	25	54	27	2	40	6	1	
11:00 AM	12.5%	0.0%	6	37	0	0	6	37	91	46	2	40	8	17	
12:00 PM	14.7%	0.0%	7	44	0	0	7	44	135	68	4	80	11	3	
1:00 PM	17.1%	0.0%	8	51	0	0	8	51	186	93	3	60	11	19	
2:00 PM	13.3%	0.0%	6	40	0	0	6	40	226	113	3	60	9	19	
3:00 PM	14.7%	0.0%	7	44	0	0	7	44	270	135	4	80	- 11	5	
4:00 PM	6.8%	0.0%	3	20	0	0	3	20	290	145	1	20	4	15	
5:00 PM	2.7%	0%	1	8	0	0	1	8	298	149	1.4	28	3	0	
6:00 PM	Tiel Jan		0	0	0	0	0	0	298	149	0	0	0	0	
7:00 PM			0	0	0	0	0	0	298	149	0	0	0	0	
8:00 PM			0	0	0	0	0	0	298	149	0	0	0	0	
9:00 PM		THE PERSON	0	0	0	0	0	0	298	149	0	0	0	0	
10:00 PM			0	0	0	0	0	0	298	149	0	0	0	0	
11:00 PM			0	0	0	0	0	0	298	149	0	0	0	0	
DAILY TOTALS	100%	0%	46	298	0	0	46	298	298	149	22.4	448	68	MAX 19	

Assumptions

46 total collection vehicles per day.

300 Tons = maximum daily throughput of hydro excavation waste
6.5 tons = average hydro vac truck load.

20 tons = average solidified load. Mostardi Platt

1/15/2023

17

17

Trucks to and from Site

Sources of Traffic Data From Application

Criterion 2:

"Site Throughput Capacity"

• Section 2.4.19 (Application Page 2-37)

"Unloading Time and Queuing Capacity"

• Section 2.4.20.2 (Application Page 2-40)

- Related Traffic Study
- Appear to be inconsistencies or room for interpretation in the above sources
- · All should be consistent

Next slide provides a comparison

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1/15/2023

18

Traffic Estimates

	Collection truck	Hourly Transfer truck trips ⁵	Total	Collection truck		Total Daily
Criteria 2 Tables 2-1, 2-2, 2-3, 2-4 ¹	98	26	124	718	198	916
Criteria 2 Section 2.4.19 Site Throughput Capacity ²	97	25	122	671	157	828
Criteria 2 Section 2.4.20.2 Unloading Time and Queuing Capacit	144	26	170	1728	624	2352
Related Traffic Study ⁴	79	14	93	Not given	Not given	

¹Cumulative peak hour traffic for each waste type, at their respective peaks.

²Page 2-37; Calculated based on anticipated daily material throughput, average truck load, and anticipated hours of operation.

³Page 2-40; Maximum possible site traffic based on unloading time and vehicle queuing capacity (72 vehicles unloading at one time equals 144 trips); Daily assumes 24hr operation.

⁴Site-generated traffic at local (not site) evening peak hour, 4:30-5:30 PM, excluding passenger vehicles.

Struck trips are equal to the number of trucks, doubled to account for entering and exiting the facility (with exception of KLOA traffic study, which provides in & out traffic).

1/15/2023 Mostardi Platt 19

19

Type of Fuel Being Used

- Assume that all trucks are using a form of Diesel
- Why is the type of fuel important
 - ○Diesel vs Bio-Diesel Less particulate and more nitrogen dioxide
 - oLNG/CNG Less particulate and nitrogen dioxide
 - oElectric No vehicle emissions
- All inside plant vehicles are using diesel or LP gas
- Type of fuel determines the impact on workers, nearby residents and those in the route to the landfill

1/15/2023 Mostardi Platt 20

21

Air Quality Constituents from Diesel-Related Traffic

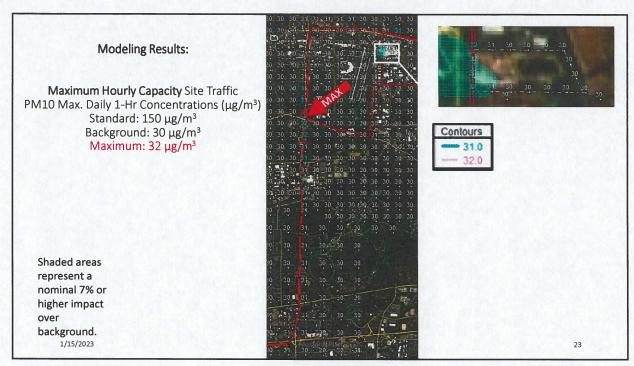
	Air Quality Data Maximum Hourly Traffic											
	PN	12.5	PM ₁₀	N	02							
	TO THE REAL PROPERTY.	Annual (µg/m3)	24-hr (µg/m3)	1-hr (ppb)	Annual (ppb)							
Background	22	10	30	55	15							
LRS Impact	1	1	2	21	19							
Cumulative Impact	23	11	32	76	34							
Current National Ambient Air Quality Standards (NAAQS)	35	12	150	100	53							
EPA Proposed Changes	25	10										
Cumulative Impact % of Standard	66%	89%	21%	76%	65%							
Background Source	Nape	erville	Lyons Twp	Schille	er Park							

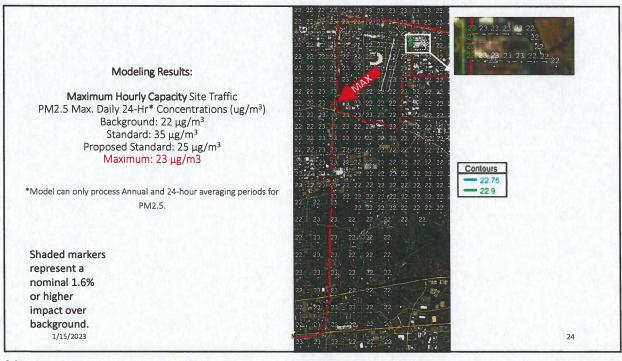
When evaluating EPA proposed changes to $PM_{2.5}$ standard, the cumulative impact increases to 98% of 24-hr standard and 106% of Annual standard.

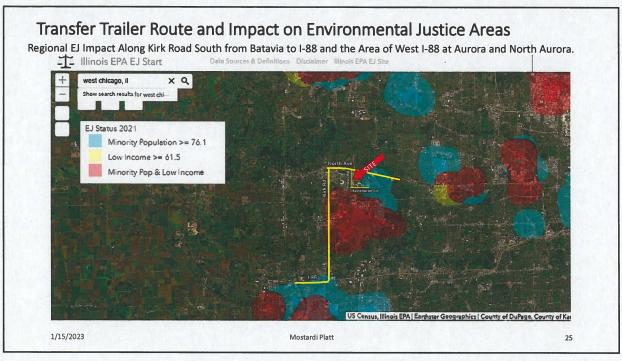
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21

Maximum Hourly Capacity Site Traffic NO₂ Max. Daily 1-Hr Concentrations (ppb) Standard: 100 ppb Background: 55 ppb Maximum: 76 ppb Shaded areas represent a nominal 10% or higher impact over background. 1/15/2023







25

Environmental Justice – USEPA Definition

 Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.



- This goal will be achieved when everyone enjoys:
 - The same degree of protection from environmental and health hazards, and
 - Equal access to the decision-making process to have a healthy environment in which to live, learn, and work.

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1/15/2023

26

Environmental Justice and this Site

No mention of Environmental Justice made within this entire Site approval submittal or process.



1/15/2023

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27

27



"In my opinion, the application for the proposed LRS Waste Transfer Facility is deficient by not determining the full impact upon public health, safety and welfare," – James Powell, QEP.

1/15/2023

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28