

Vermont Renewable Gas, LLC

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November 21, 2023

**Via U.S. First Class Mail
and Email**

Town of Lyndon Selectboard
Justin Smith, Municipal Administrator
119 Park Avenue
P.O. Box 167
Lyndonville, Vermont 05851-0167
justin@lyndonvt.org
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Northeastern Vermont Development
Association
David Snedeker, Executive Director
36 Eastern Avenue, Suite 1
P.O. Box 630
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dsnedeker@nvda.net

Town of Lyndon Planning Commission
Justin Smith, Municipal Administrator
119 Park Avenue
P.O. Box 167
Lyndonville, Vermont 05851-0167
justin@lyndonvt.org

Re: Vermont Renewable Gas, LLC’s 45-Day Notice to Persons and Entities Entitled to Notice Pursuant to Public Utility Commission Rule 5.402(A), for a Proposed 2.2 MW Agricultural Methane Facility to be Located on Industrial Parkway in Lyndon, Vermont.

Dear Planning Commission and Selectboard Members:

Vermont Renewable Gas, LLC (“VRG”) is pleased to provide you with this 45-Day notice in advance of filing a petition for a Certificate of Public Good with the Vermont Public Utility Commission (“PUC”) pursuant to 30 V.S.A. § 248(j) for a 2.2 MW electric generation facility utilizing methane derived from agricultural operations (“farm methane”) to be known as “Vermont Renewable Gas – Lyndon” (the “Project”).

We anticipate filing the petition with the PUC on January 5, 2024, and are providing the following Project overview and related information in accordance with 30 V.S.A. § 248 (“Section 248”) and PUC Rule 5.402.

I. Project Description

VRG is proposing a 2.2 MW electric generation project on property located on Industrial Parkway within the Saint Johnsbury – Lyndon Industrial Park in Lyndon, Vermont. The site

location, building, associated equipment, and approximate property boundaries are shown in the preliminary site plan attached as **Attachment 1**. Industrial Parkway bounds the property on the west.

The project will convert chipped fiber from local agricultural operations into renewable fuel gas, i.e. methane. This renewable gas will be combusted in three on-site biogas generator sets to produce electric power. The Project will occupy 3 acres of a greater 7.8-acre area to be partitioned from a larger 22.64 acre parcel presently owned by the Northeastern Vermont Development Association. The electricity generated by this Project will be interconnected to the distribution system of the Town of Lyndon Electric Department.

The Project is being developed to provide new, locally generated renewable energy to Vermont residents as part of Vermont's Standard Offer Program. In addition to providing renewable energy, the project will contribute significantly to carbon dioxide sequestration and methane emission reductions. The Project will also provide an important local market for low-grade woody fiber and the byproducts of fiber, maple sap, Christmas tree, horticultural, and orchard crop production – each a substantial agricultural commodity grown and harvested locally within the Northeast Kingdom region. By purchasing these inputs—collectively known as “feedstock”—the Project will benefit local farmers and associated small local businesses in the feedstock supply chain. Biochar produced as a Project byproduct will then be sold to local farmers, supporting the circular economy. In addition, the Project will directly create well-paying operations jobs and generate a new source of property tax revenue for Lyndon.

In summary, the Project will consist of:

- An approximately 8,137.5 square foot pre-fabricated equipment and control building
- A truck scale for weighing of incoming feedstock
- A feedstock delivery and pre-treatment island consisting of a truck dumper, walking-floor in-feed system, and a combination hammer mill/dryer unit, with the outdoor area of use measuring approximately 187.7 feet long x 54.8 feet wide
- Two feedstock buffer storage silos, each approximately 8.2 feet in diameter and 6.6 x 82 cubic feet in volume
- One concrete pad behind the building for the two buffer silos and a bag filter house (for feedstock prep dust collection) measuring approximately 69.9 feet long and 14.4 feet wide
- One high temperature fast pyrolysis system consisting of dual organics to energy reactor vessels for decomposition of feedstock into renewable fuel gas
- Three biogas combined heat and power units including integrated selective catalytic reduction systems
- One organic rankine, clean cycle heat generator for conversion of waste thermal energy into electric energy for feedstock pre-treatment
- Outdoor laydown area for delivery and storage of feedstock, approximately .25 acres
- One byproduct (biochar) storage silo, approximately 6.5 feet in diameter and 3.2 feet x 39.4 cubic feet in volume
- An emergency flare stack on an approximately 15.7' x 21.3' concrete pad
- An emergency diesel generator for providing electric energy during limited outages

- An emergency oil-fired boiler for providing thermal energy during limited outages
- Existing road infrastructure for access to the Project

II. Site Selection and Consideration of Alternatives

This site was selected because it is part of an active industrial park which has been actively promoted by both the Town of Lyndon and the Northeastern Vermont Development Association as an ideal location for the siting of industrial business activities. The site was further chosen because of its proximity to substation infrastructure, access to three phase transmission infrastructure, its cleared “make ready” state, and limited environmental impacts.

VRG worked with its Engineering, Procurement and Construction contractor and consultants to configure the Project in a way that would maximize potential site benefits while minimizing environmental and aesthetic impacts. VRG will continue working with all stakeholders prior to filing the CPG petition to address any concerns.

III. Construction & Transportation

VRG plans to deliver materials and equipment for construction of the Project directly to the site with trucks via state and local roads without any appreciable change in traffic volume or type. This construction-related transportation will last approximately six months.

Once the Project is operational VRG expects to deliver three to five truckloads of feedstock to the site per day, and to transport one truckload of biochar from the site per day. Approximately six to eight employees will drive personal vehicles to and from the Project site daily. The industrial park at the Site location is already accustomed to receiving deliveries of various industrial commodities including propane gas, biomass fuel, lumber, freight packages, and sheet metal for existing commercial and industrial businesses within the industrial park. A community bus yard also operates from within this industrial park. New traffic associated with Project operation will have no appreciable change in traffic volume or type.

Access to and from the site will be restricted to a single driveway. All equipment associated with the Project will be installed in accordance with applicable regulations and electrical codes.

IV. Preliminary Impact Assessment

The Project will be set back no less than 50 feet from the Industrial Parkway right-of-way, and a buffer zone of no less than 25 feet wide will be maintained along all property lines. Deciduous shade trees will be planted for screening of feedstock unloading, byproduct loading, and parking areas. Well-kept grass areas will be maintained surrounding the Project.

Overall preliminary review by VRG indicates that the Project will not result in undue impacts to the aesthetic and scenic and natural beauty of the area. Instead, the Project is designed to meet the aesthetic requirements of the industrial park’s existing covenants, which the municipalities of Lyndon and Saint Johnsbury and the Northeastern Vermont Development

Association had a role in drafting. These covenants are included enclosed with this letter as **Attachment 2**. Visually, the project is designed in a manner that is consistent with the industrial park setting and which conforms with visual requirements set forth in the covenants. Visual impact will also be mitigated by vegetative screening. The project will not produce any strong odors. While the Project contains several generators, noise will be minimized by housing these indoors, and noise impacts of the Project will again conform with noise requirements set out in the covenants. VRG will continue to work with Lyndon, Northeastern Vermont Development Association, and adjoining property owners in order to address any potential aesthetic impacts. The Applicant will file copies of the industrial park covenants and Project site plan, with final mitigation measures, where warranted, with the complete petition.

Given that the project is located within an existing industrial park, the likelihood of adverse impacts to natural resources is low. VRG has engaged Berkshire Environmental Consultants, Inc. and Horizons Engineering, Inc. to conduct natural resource assessments, including both database and field surveys. Preliminary results indicate there are no environmental concerns present at the site. A map of the Project site and surrounding areas from the Vermont Agency of Natural Resources Atlas is enclosed with this letter as **Attachment 3**. Final results of natural resource studies will be provided with the final petition.

V. Additional information

The information contained in this package is intended to provide a general understanding of the Project and is subject to change based on further analysis and the requirements of applicable permits.

Before beginning work on the Project, VRG must obtain a Certificate of Public Good (“CPG”) from the PUC under 30 V.S.A. § 248. Before issuing a CPG, the PUC must find, among other things, that the Project “will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the municipal and regional planning commissions, the recommendations of the municipal legislative bodies, and the land conservation measures contained in the plan of any affected municipality.”

Projects submitted to the Commission pursuant to Section 248 require that local and regional planning commissions and municipal legislative bodies be given 45 days advance notice of the filing. This letter and accompanying attachments are being provided to satisfy that requirement.

Pursuant to 30 V.S.A. § 248(f), municipal and regional planning “commissions shall make recommendations, if any, to the Public Utility Commission and to the petitioner at least 7 days prior to filing of the petition with the Public Utility Commission.” Under PUC Rule 5.402(A)(2), municipal and regional planning commissions may “may provide revised recommendations within 45 days of the date on which petitioner has filed a petition with the Commission if the petition contains new or more detailed information that was not previously included in the petitioner’s filing with the municipal and regional planning commissions pursuant to Section 248(f).”

Please send all recommendations during this 45-Day notice period to:

Vermont Public Utility Commission
c/o Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

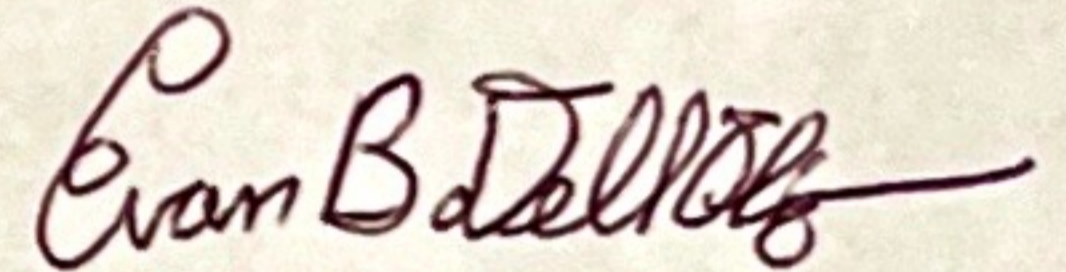
AND

Vermont Renewable Gas, LLC
Attn: Evan B. Dell'Olio
145 Pine Haven Shores Road
Suite 1000A
Shelburne, Vermont 05482
evan.dellolio@synergy-ne.com

For additional information regarding the PUC processes, please refer to the PUC's "Guide to the Vermont Public Utility Commission's Section 248 Process," available on the PUC's website.

Thank you in anticipation of your review of these materials. We look forward to receiving any input or suggestions you may have as we move through the Section 248 process. If you have any questions, you may direct them to the Applicant by phone at (802) 427-4762 or by email at evan.dellolio@synergy-ne.com.

Sincerely,



Evan B. Dell'Olio
Manager

Vermont Renewable Gas, LLC

- Attachment 1 – Preliminary Site Plan
- Attachment 2 – Saint Johnsbury – Lyndon Industrial Park Covenants
- Attachment 3 – ANR Natural Resources Atlas Map

Copy with attachments to:

Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620-2701

Agency of Agriculture, Food, and Markets
Secretary Anson Tebbetts
116 State Street
Montpelier, Vermont 05620-2901

Department of Public Service
James Porter, Director for Public Advocacy

Department of Historic Preservation
Laura V. Trieschmann

112 State Street – Third Floor
Montpelier, Vermont 05620-2601

Agency of Natural Resource
Secretary Julia Moore
1 National Life Drive, Davis 2
Montpelier, Vermont 05620-3901

Vermont Natural Resources Board
Kirsten Sultan, District 7 Coordinator
District #7 Environmental Commission
274 Emerson Falls Road, Suite 4
Saint Johnsbury, Vermont 05819-2099

One National Life Drive
Deane C. Davis Building, 6th Floor
Montpelier, Vermont 05620-0501

Town of Lyndon Electric Department
Jonathan Ewell, General Manager
119 Park Avenue
P.O. Box 167
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