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June 29, 2018

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SINGLE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Bourne Integrated Solid Waste Management Facility
PROJECT MUNICIPALITY	: Bourne
PROJECT WATERSHED	: Cape Cod
EOEA NUMBER	: 11333
PROJECT PROPONENT	: Town of Bourne
DATE NOTICED IN MONITOR	: May 23, 2018

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Supplemental Environmental Impact Report (Single Supplemental EIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Project Description

As described in the Single Supplemental EIR, the project consists of Phase 6 of the Bourne Integrated Solid Waste Management Facility (ISWMF) project. Phase 6 of the project consists of the construction of a lined landfill cell that will incorporate leachate collection and landfill gas management infrastructure. It is proposed on previously disturbed land. Existing roads will provide access to and around the site. The 6.69-acre expansion will provide 920,000 cubic yards (cy) of capacity.

Phase 6 is designed to support Phase 7 and Phase 8 which could yield another 3,830,000 cy of capacity and extend the life of the landfill to 2034. The Single Supplemental EIR also provides an updated conceptual development plan for Phase 7, Phase 8 and for the proposed residential recycling center and proposed relocated offices.

Procedural History

Review of the Bourne ISWMF project was initiated with the submission of an Environmental Notification Form (ENF) in 1997. As described in the 1997 ENF, the ISWMF project entailed the development of a regional waste management facility within the Bourne Landfill located off MacArthur's Boulevard (Route 28). The project was intended to meet a regional need for the processing and disposal of construction and demolition (C&D) material, and Difficult-To-Manage (DTM) wastes on Cape Cod. The project included the capping and/or mining of previously landfilled areas, as well as the development of a number of new lined landfill phases for regional non-municipal solid waste. The average disposal rate was identified as 300 to 500 tons per day (tpd). The project was designed to accept a maximum of 825 tpd of waste materials at full build-out. As described in the ENF, approximately 400 tpd would be disposed of on-site, 250 tpd of C&D waste would be processed; 100 tpd would be recycled; 50 tpd would be composted; and 25 tpd would consist of diverted waste. The ENF was followed by a Draft and a Final EIR in 1998 and 1999 (respectively), both of which were determined to be adequate. The Certificate on the FEIR, issued November 29, 1999, acknowledged that certain aspects of the landfill project, including Phase 6, were conceptual and required that the Town submit Notices of Project Change (NPCs) to the MEPA Office to address development of subsequent phases.

NPC-1 was submitted in April 2003 and expanded the waste stream to include Municipal Solid Waste (MSW) and Municipal Combustor Ash (MCA), increased the quantity of MCA it received, and allowed it to be co-mingled with MSW for landfilling with the Facility. NPC-1 did not increase the maximum permitted capacity (825 tpd) accepted for disposal, reuse, composting, and recycling. The Town committed to cease accepting unprocessed C&D material by January 1, 2004 in accordance with the Authorization to Operate (ATO) permit. The August 7, 2003 Certificate on NPC-1 determined that the potential impacts associated with the proposed project change did not warrant the preparation of an EIR.

On April 2, 2007, the MEPA Office determined that the Bourne ISWMF's temporary increase in capacity of 500 additional tpd of MSW (1,325 tpd total) qualified as an Emergency Action pursuant to the MEPA regulations. The additional MSW would be diverted from the SEMASS waste-to-energy facility in Rochester, MA which was damaged by a fire on March 31, 2007. A second NPC (NPC-2) was filed on April 17, 2007 under the Emergency Action provisions of the MEPA Regulations to address these actions and the Certificate issued on May 25, 2007 determined that the emergency action did not warrant the preparation of an EIR.

In December 2008, the Town submitted a third NPC (NPC-3) which included the phased construction of five landfill gas (LFG) reciprocating engine/electric generator sets with equipment to recover and convert LFG from the facility to electricity. The proposed energy facility was designed to generate up to 4.3 megawatts (MW) of electricity. The Certificate issued

on January 23, 2009 determined that the potential impacts associated with NPC-3 did not warrant the preparation of an EIR.

In January 2016, the Town submitted a fourth NPC (NPC-4) which included an update on the Phase 1D landfill reclamation project and a final development plan for Phase 5 of the landfill. The NPC proposed a hybrid version of two scenarios that were considered in prior MEPA review. The February 5, 2016 Certificate on NPC-4 determined that the potential impacts associated with the proposed project change did not warrant the preparation of an EIR.

The Proponent submitted an Expanded NPC in December 2017 for Phase 6 with a request that I allow a Single Supplemental EIR to be prepared in lieu of a Draft and Final Supplemental EIR. The Certificate issued on January 12, 2018 granted that request.

Project Site

The Bourne ISWMF, located at 201 MacArthur Boulevard (Route 28), is comprised of a 74-acre site-assigned parcel which contains landfill operations and facilities. In 2001, a 25-acre parcel immediately abutting the landfill to the south was purchased and has been used for recycling and transfer operations. The landfill contains lined and unlined waste disposal areas. Phases 1A, 1B, 1C, and 1D are unlined cells that comprise the oldest portion of the landfill. Phases 1A, 1B, and 1C are closed and capped. Phase 1D was part of a pilot landfill reclamation project with the Massachusetts Department of Environmental Protection (MassDEP) that removed the solid waste in this area to create additional landfill space. Phases 2 and 3 are both lined, closed, capped and contain leachate collection systems. Phase 4, an active landfill cell, is located in the area previously occupied by Phase 1D. Phase 5 addressed a vertical expansion proposed over Phases 1A, 1B, and 1C. MassDEP issued an Authorization to Construct (ATC) and ATO Permit in 2017.

Permits and Jurisdiction

The development of Phase 6 is undergoing MEPA review because it consists of a material change to the project prior to the taking of all Agency Actions. The project change exceeds the mandatory EIR threshold at 301 CMR 11.03 (1)(a)(2) because it will create more than 10 acres of new impervious area. The project also exceeds the ENF threshold at 301 CMR 11.03(1)(b)(3) because it includes conversion of land held for natural resources purposes in accordance with Article 97 to any purpose not in accordance with Article 97. The Phase 6 requires an ATC and an ATO from MassDEP. Because it requires an EIR, the project is subject to review in accordance with the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol ("GHG Policy").

The project will also require a modification to a Development of Regional Impact (DRI) from the Cape Cod Commission (CCC).

Because the Town is not seeking Financial Assistance, MEPA jurisdiction is limited to the subject matter of required or potentially required state Permits that have the potential to cause

Damage to the Environment, as defined in the MEPA regulations. MEPA jurisdiction extends to land alteration, solid waste, Article 97 land and GHG emissions.

Review of the Single Supplemental EIR

The Single Supplemental EIR described the project, identified existing conditions, and described potential environmental impacts and mitigation measures. It provided a brief description of applicable statutory and regulatory standards and requirements, and described how the project will meet those standards. The Single Supplemental EIR provided a list of required local, state, and federal permits and provided an update on the status of each of these actions.

Comments from State Agencies did not identify any significant impacts that were not reviewed in the Single Supplemental EIR or identify additional alternatives for further review. The Proponent intends to commence construction of the landfill liner in the summer of 2018 which will allow adequate time for construction and review by MassDEP prior to making a determination regarding an ATO in early 2019.

According to the Single Supplemental EIR, Phase 6 will not result in increased environmental impacts compared to the project reviewed in the 1999 FEIR, nor will it require modification of any previously issued Section 61 Findings. The daily tonnage and waste composition will remain consistent. Phase 6 is proposed on site-assigned land approved by the Bourne Board of Health.

Phase 6 consists of a double composite lined landfill cell which includes constructing a new primary composite liner and leachate collection system and a secondary composite liner with leak detection and includes, from bottom to top:

- A subgrade layer of compacted soil;
- A low-permeability soil barrier layer comprised of twelve inches of compacted low permeability soil (natural soils);
- A secondary geocomposite clay liner barrier layer;
- A secondary geomembrane barrier layer consisting of a high density polyethylene (HDPE) flexible membrane liner (FML);
- A secondary geocomposite leak detection layer consisting of a hi-planar HDPE bonded on both sides with a non-woven geotextile geocomposite drainage layer; and,
- A leachate collection layer consisting of a minimum of 18-inches of sand.

The Single Supplemental EIR identifies Phase 7 and 8 as contiguous phases constructed in progression southward from Phase 6. Phase 7 would be constructed over the southern slope of Phase 6 and Phase 8 would be constructed over the southern slope of Phase 7. Both phases would be constructed using the double composite lined landfill design with leak detection designed to meet regulatory requirements for liner construction. Phase 7 and Phase 8 are proposed in areas that are currently used for site-assigned solid waste handling activities. The Town will be required to modify its Site Assignment with the Board of Health prior to developing either Phase 7 or Phase 8. In 2016, the Town acquired approximately twelve acres

abutting the residential recycling center at the southern boundary of the site. If Phase 7 and 8 proceed, the Town may also relocate offices and handling facilities to the 12-acre parcel.

Article 97

The Single Supplemental EIR identifies the Town's analysis of alternatives for construction of an on-site leachate system. Currently, leachate is conveyed to a large on-site storage tank and is removed from the site via trucks. Any on-site treatment will require discharge of clean, treated effluent. The Joint Base Cape Cod (JBCC), which is adjacent to the landfill site, includes a clean effluent pipeline used for the discharge from the wastewater treatment plant at JBCC. The pipeline is located within the boundary of the Upper Cape Water Supply Reserve (the Reserve), which is state conservation land protected in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth (Article 97). The construction of a connection requires an easement over 2,500 sf of Article 97 land.

The Single Supplemental EIR identified the Article 97 land impacted by the project and indicated that the conversion was authorized by a two-thirds vote of the legislature and codified by the General Court in Chapter 223 of the acts of 2016 which was signed by Governor Baker on August 10, 2016. The legislation authorizes the Massachusetts Department of Fish and Game (DFG) to transfer an approximately 2,500 square foot (sf) easement on Canal View Road at JBCC within the Upper Cape Regional Water Supply Reserve. The authorizing legislation is limited to installation and maintenance of a pipe to connect to the Wastewater Treatment Plant.

The Single Supplemental EIR addresses consistency with the EEA Article 97 Land Disposition Policy which guides the circumstances under which an EEA Agency may transfer Article 97 land or support a transfer of Article 97 land. The goal of the Policy is to ensure no net loss of Article 97 lands under the ownership and control of the Commonwealth and its political subdivisions. The Single Supplemental EIR includes a description of the land proposed for disposition (size, location, presence of resource areas, etc.), an alternatives analysis and identification of compensatory open space. The Town of Bourne will record a permanent conservation restriction (CR) over 77 acres of municipal land managed by the Bourne Conservation Commission and the CR will be held by DFG.

Greenhouse Gas Emissions (GHG)

The project is subject to the GHG Policy because it exceeds thresholds for a mandatory EIR. The Policy requires Proponents to quantify carbon dioxide (CO₂) emissions and identify measures to avoid, minimize or mitigate such emissions. The Policy directs proponents to use applicable building codes to establish a project emissions baseline that is "code-compliant." However, there is no building energy code equivalent that applies specifically to landfills or energy use models (such as eQUEST) designed to estimate the projected energy use of the landfill energy loads. Therefore, prior to the submittal of the Expanded NPC the Town had consulted with the MEPA Office and the Department of Energy Resources (DOER) in development of the GHG analysis. The Expanded NPC identified current MSW/MCA contract scenarios, the decrease in LFG associated with each, the actual LFG collection system efficiency

compared to industry standards, and the flare efficiency. It also quantified GHG emissions from direct (flaring and fugitive emissions) and indirect (flare and LFG collection motors) sources.

Currently, the Town mitigates the emission of GHG through an extensive landfill gas collection system and thermal destruction system. A major reduction in the production of GHGs has been achieved by shifting the waste it accepts. Approximately 86 percent of its annual tonnage is in the form of municipal waste combustor ash which does not produce gases.

The Supplemental Single EIR evaluates and quantifies the potential GHG reduction associated with LFG measures based upon the following system assumptions: LFG conversion to pipeline natural gas; microturbines fueled by LFG; LFG-to-energy facility; and, anaerobic digestion of organic materials and biogas-to-energy. In addition, the Town is assessing the feasibility of and the potential development of:

- Recovering thermal energy;
- LFG Blower Powers with 40 horsepower motors;
- Photovoltaic (PV) Solar - potential 12.6 MW solar installation over 30-acres of landfill and on the roof of an existing facility;
- Operation of an animal crematory that would use the LFG as a fuel.
- Additional thermal recovery of LFG from combustion to heat the maintenance building;
- Vertical axis wind turbines;
- Use of compressed natural gas for trucks; and,
- Regional composting.

Rare Species

Portions of the project site are mapped as Priority Habitat for the Eastern Box Turtle (*Terrapene carolina*), a species state-listed as Special Concern according to the Massachusetts Natural Heritage Atlas (14th Edition). This species and its habitats are protected pursuant to the Massachusetts Endangered Species Act (MGL c.131A) and its implementing regulations (MESA; 321 CMR 10.00).

The Natural Heritage and Endangered Species Program (NHESP) has determined, in a letter dated January 19, 2018, that the Phase 6 Landfill Expansion, as currently proposed, is exempt from MESA review pursuant to 321 CMR 10.14.

Comments from NHESP indicate that the Town has consulted with NHESP regarding Phases 7 and 8. The NHESP comments indicate that it is unclear whether Phases 7 and 8 will be exempt from MESA review (321 CMR 10.14) or require a direct filing with the NHESP (321 CMR 10.18). Projects resulting in a “take” of state-listed species may only be permitted if they meet the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23). In order for a project to qualify for a CMP, the Town must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species.

Construction Period

Construction is anticipated to commence in summer 2018. The Single Supplemental EIR identified measures to prevent or minimize impacts during the construction period. The Town was asked to submit a Stormwater Pollution Prevention Plan (SWPPP) required as part of the National Pollution Discharge Elimination System (NPDES) Construction General Permit (CGP). The Single Supplemental EIR states that the Town is not required to file a NPDES CGP because all stormwater will be contained on-site within two large basins and will be infiltrated.

The Town will use ultra-low sulfur diesel (ULSD) fuel in its diesel-powered construction equipment and will require its contractors to do the same. The project will also comply with MGL c.90 §16A and MassDEP anti-idling regulations (310 CMR 7.11(1)(b)) and will comply with MassDEP Solid Waste and Air Quality Control regulations, pursuant to M.G.L. Chapter 40, Section 54, during construction. All construction activities should be undertaken in compliance with the conditions of all State and local permits.

Future Submissions

The Single Supplemental EIR indicates that the Town will submit a NPC to address development of Phase 7 and 8. This subsequent NPC should provide an updated development plan for Phase 7, Phase 8, the residential recycling center and relocated offices. The NPC should provide a cumulative assessment of potential impacts and avoidance, minimization, and mitigation measures for Phase 7 and Phase 8. As stated previously subsequent phases may result in a "Take" of the Eastern Box Turtle and require a CMP from the NHESP.

Conclusion

Based on a review of the Single Supplemental EIR, comment letters and consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. State Agencies and the Town should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

June 29, 2018

Date



Matthew A. Beaton

Comments received:

06/19/2018 Natural Heritage and Endangered Species Program (NHESP)
06/22/2018 Massachusetts Department of Environmental Protection (MassDEP) – Southeast Regional Office (SERO)

MAB/ACC/acc



DIVISION OF FISHERIES & WILDLIFE

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MASS.GOV/MASSWILDLIFE

Jack Buckley, *Director*

June 19, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Anne Canaday, EEA No. 11333
100 Cambridge St.
Boston, Massachusetts 02114

Project Name: Bourne Integrated Solid Waste Management Facility
Proponent: Town of Bourne, Department of Integrated Solid Waste Management (ISWM)
Location: 201 MacArthur Boulevard, Bourne, MA
Project Description: Phase 6 Landfill Expansion
Document Reviewed: Supplemental Single Environmental Impact Report
EEA File Number: 11333
NHESP Tracking No.: 17-36534

Dear Secretary Beaton:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the *Supplemental Single Environmental Impact Report* (SEIR) for the Town of Bourne Integrated Solid Waste Management Facility's proposed Phase 6 Landfill Expansion Project and would like to offer the following comments regarding state-listed species and their habitats.

According to the information provided in the SEIR, portions of the Project site are mapped as *Priority Habitat* for the Eastern Box Turtle (*Terrapene carolina*), a species state-listed as Special Concern according to the *Massachusetts Natural Heritage Atlas* (14th Edition). This species and its habitats are protected pursuant to the Massachusetts Endangered Species Act (MGL c.131A) and its implementing regulations (MESA; 321 CMR 10.00). A Fact Sheet for this species can be found on our website, www.mass.gov/nhesp.

All projects or activities proposed within *Priority Habitat*, which are not otherwise exempt pursuant to 321 CMR 10.14, require review through a direct filing with the Division for compliance with the MESA (321 CMR 10.18). The Division has determined (letter dated January 19, 2018; Attachment 3 of the SEIR) that the Phase 6 Landfill Expansion, as currently proposed, appears to be exempt from MESA review pursuant to 321 CMR 10.14. The Proponent has initiated pre-filing consultations with the Division regarding Phases 7 and 8. At this time, and pending submittal of additional information by the Proponent, it is unclear whether Phases 7 and 8 will be exempt from MESA review (321 CMR 10.14) or require a direct filing with the Division (321 CMR 10.18).

As noted in the Division's previous comments (dated January 5, 2018) on the Expanded Notice of Project Change, development of the proposed Future Handling Area (11.7 acres) and proposed effluent

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connection projects would require a direct filing with the Division for compliance with the MESA. The Proponent has initiated pre-filing consultations with the Division to discuss conceptual development plans associated with the Future Handling Area. Although a formal MESA filing has not yet been submitted, the Division anticipates – based on previously submitted information and ongoing consultations with the Proponent – that development of the Future Handling Area, as proposed, will likely result in a Take (321 CMR 10.18 (2)(b)) of the Eastern Box Turtle.

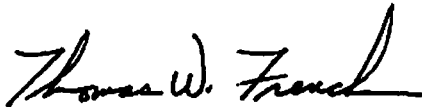
Projects resulting in a Take of state-listed species may only be permitted if they meet the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23). In order for a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species.

The Proponent has continued to proactively consult with the Division on a pre-filing basis to avoid, minimize and mitigate impacts to state-listed species and their habitats associated with potential development of the Future Handling Area. Based on ongoing consultations with the Proponent, it is our understanding that the Proponent intends to meet the performance standards of a CMP by permanently protecting off-site land in the vicinity of the site as open space and state-listed species habitat. The Proponent has identified a candidate parcel which, based on information submitted to the Division, will likely provide an acceptable mitigation option to address the required long-term net benefit for impacts to Eastern Box Turtle associated with development of this site. Although the exact details of the long-term net benefit required under a CMP have not yet been finalized, the Division anticipates that a suitable long-term net benefit can be achieved through the protection of suitable, high quality off-site habitat and that the project should be able to meet the performance standards of a CMP.

The Division will not render a final decision regarding the Future Handling Area until the MEPA review process and its associated public and agency comment period is complete, and until all required MESA filing materials are submitted to the Division. No alteration to the soil, surface, or vegetation, and no work associated with the proposed Future Handling Area or proposed effluent connection projects, shall occur on the property until the Division has made a final determination.

If you have any questions about this letter, please contact Jesse Leddick, Chief of Regulatory Review, at (508) 389-6386 or jesse.lednick@state.ma.us. We appreciate the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, reading "Thomas W. French". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Thomas W. French, Ph.D.
Assistant Director

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**cc: Phil Goddard, Town of Bourne ISWM Department
Daniel T. Barrett, Town of Bourne ISWM Department
Town of Bourne Board of Selectmen
Town of Bourne Conservation Commission
Town of Bourne Planning Department
DEP Southeast Regional Office
Amy Ball, Horsley Witten Group, Inc.**

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Matthew A. Beaton
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Martin Suuberg
Commissioner

June 22, 2018

Mathew A. Beaton,
Secretary of Environment and Energy
Executive Office of Environmental Affairs
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: SSEIR Review. EOEEA # 11333.
BOURNE. Town of Bourne Integrated Solid
Waste Management Facility at 201
MacArthur Boulevard

Dear Secretary Beaton,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Single Supplemental Environmental Impact Report (SSEIR) for the Town of Bourne Integrated Solid Waste Management Facility Project to be located at 201 MacArthur Boulevard, Bourne, Massachusetts (EOEEA # 11333). The Project Proponent provides the following information for the Project:

Since the writing of the original EIR, the Town has purchased two parcels that have facilitated maximum development of the landfill phases as discussed. In 2001, a 25-acre parcel immediately abutting the landfill to the south was purchased. This site has been site-assigned by the Bourne Board of Health and has allowed for the development of solid waste handling facilities and most recently, relocation of temporary offices. It was also the subject of an Advisory Opinion by the Secretary that indicated that an EIR was not needed in order to develop this parcel. Additionally, the Town purchased approximately twelve acres to the south of the 25-acre parcel in 2016. Subject to permitting, this area will allow for potential relocation of solid waste handling operations and construction of permanent offices so that Phase 7 and Phase 8 can be developed, which will be discussed later. However, this land is not needed in order to complete the construction of either Phase 6 development scenario. Temporary stockpiles of sand created by the preparation of Phase 6 base liner elevations will be stored on the 25-acre parcel, or if approved, the twelve-acre parcel, until they are needed for the liner construction or for subsequent capping projects such as for Phase 4, Stage 2 and Phase 5.

The overall impact of these acquisitions is that the areas utilized for landfilling can be maximized while at the same time providing area for other solid waste handling facilities such as a C&D transfer station, single-stream recyclables transfer station, a residential recycling center and ISWM Department offices. The development of Phase 7 and Phase 8, which would be located on the 25-acre parcel, requires several steps including a separate, new EIR with MEPA, a Development of Regional Impact (DRI) approval from the CCC and a major modification to the site assignment by the Bourne Board of Health.

Bureau of Air and Waste Comments

Solid Waste Comments: The solid waste section identified an Authorization to Construct permit application and an Authorization to Operate permit as being required. These requirements were acknowledged in the SEIR, and an ATC application submitted to MassDEP.

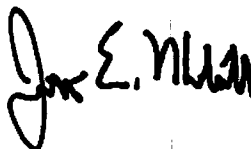
The proponent also submitted Proposed Section 61 Findings for the solid waste program permit on page 33. The Expanded NPC Certificate stated that "The Single EIR should present plans for the leachate collection system, leachate pre-treatment system and landfill gas management." Although these were discussed in the narrative, formal design plans were not provided. Since detailed leachate collection system plans and conceptual landfill gas management plans are part of the ATC application, lack of submission of formal design plans does not appear to be an issue.

Leachate pre-treatment plans will be developed if the option to discharge on the Joint-base Cape Cod is further pursued.

Other Comments/Guidance

MassDEP staff is available to provide additional guidance to the Proponent upon request. If you have any questions regarding this comment letter please do not hesitate to contact George Zoto at (508) 946-2820.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
David Johnston, Deputy Regional Director, BWR
Maria Pinaud, Deputy Regional Director, BAW
Gerard Martin, Deputy Regional Director, BWSC
Jennifer Viveiros, Deputy Regional Director, ADMIN
Dan Connick, Solid Waste, BAW
Mark Dakers, Chief, Solid Waste, BAW
Doug Coppi, Solid Waste, BAW
Allen Hemberger, Site Management, BWSC