



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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Matthew A. Beaton
Secretary

Martin Suuberg
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August 27, 2018

Mr. Robert Cummings
Enviro Cycle, LLC
50 Homers Wharf
New Bedford, MA 02740

RE: Determination of Administrative Completeness
with Technical Comments on
Corrective Action Design Application BWP SW 25
Transmittal No. X280902

AT: Attleboro Landfill
179 Peckham Street
Attleboro, MA
Facility No. 132263 R.O. No. 172303

Dear Mr. Cummings,

The Massachusetts Department of Environmental Protection ("MassDEP" or "Department") has completed its Administrative Review of the permit application listed above and determined that the application is administratively complete. Accordingly, MassDEP has begun its Technical Review.

The Application is comprised of the following documents and is being reviewed pursuant to 310 CMR 19.000 Solid Waste Management Regulations and the Department's Landfill Technical Guidance Manual, May 1997 (the "Manual"):

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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MassDEP Website: www.mass.gov/dep

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- A. One bound document entitled "Corrective Action design, Attleboro Landfill – Phase B, 179 Peckham Street, Attleboro, Massachusetts", July 27, 2018; and
- B. A set of five 24' x 36" design drawings entitled "Attleboro Landfill Phase B Closure Plan", dated June 20, 2018.

During its review, MassDEP determined that additional information is necessary to clarify and supplement the application. In accordance with 310 CMR 4.20(2).2.b the Department may request additional information during a technical review. Please review and respond in writing to the following comments.

1. Comment on Project Narrative:

- a. Narrative section 3.1.3 states that GSE of Houston Texas, or approved equal, will supply and install the membrane in accordance with their QA manual for the installation. Provide a copy of the GSE QA manual for MassDEP review. Where the GSE QA manual states the design engineer is to make a determination, cite the issue and make a project specific determination. (For example: state that independent third party destructive seam testing will be performed in addition to field testing and the samples will also be archived.) Also, state that independent third party testing shall follow the protocol for on-site testing for peel and shear.

2. Comments on Project Specifications:

- a. Specification 01400, Quality Assurance /Quality Control part 3.14 states the Subcontractors' QA manual must be submitted and approved by the Engineer prior to starting work. Should GSE not be selected as the supplier/installer as indicated above, MassDEP will require submittal of the selected supplier/installers QA manual at the time of selection for MassDEP review and approval. Accordingly, the geomembrane supplier/installer must be selected in a timely fashion. (also refer to comment 1.a above)
- b. Narrative page 13 states the maximum stone size in the sand drainage layer will be 3/8". Specification 02200 2.01: Earth Materials, Part B: Drainage Sand should also specify a maximum 3/8" stone size and a maximum of 5% passing the #200 sieve. Refer to MassDEP's Landfill Technical Guidance Manual page 1-15.
- c. Specification 02200 2.01: Earth Materials, Part G: Topsoil should include a testing for permeability with a maximum permeability value of the value used in the HELP Model evaluation.

3. Comments on stormwater calculations:

- a. Discuss the results of the HELP model evaluations submitted.
- b. Provide calculations demonstrating the 3:1 sloped areas in the northeast and northwest corners of Phase B will be stable under maximum flow conditions in the drainage sand.
- c. Confirm that the post-construction drainage area assumptions in the “Drainage Report” are consistent with the final design based on MassDEP’s “Drawing 3 comment 4b below.
- d. Demonstrate that the access road side drainage swales, road crossing conduits and downspouts have adequate capacity.
- e. Determine the anticipated maximum depth of stormwater ponded in Pond No.1 and in the “Staging and Preliminary Sedimentation Area”. Ensure the rip-rap stone at the toe of slope extends above these elevations to ensure stormwater within the sand drainage layer can freely discharge through the stone under all stormwater ponding conditions. Also ensure that the sand drainage layer sub drain pipes daylight above this elevation. (refer to comment 5f)

4. Comments on Drawing 3:

- a. The Traffic Control Plan states on page 7, Section 3.4.2: *Wheel Cleaning* that crushed stone will be placed as a road surface for the last 300 feet of the road from the work area to Peckham Street. Add the proposed crushed stone road area to Drawing 3.
- b. Revise Drawing #3 to show the spot elevations, break points, flow direction and minimum slope in all stormwater swales.
- c. Provide base area spot elevations and contour line labels for each stormwater pond.
- d. Provide documentation that the proposed final contours will provide for placement of the quantity of Re-Crete approved in the Administrative Consent Order #00002501.
- e. Discuss and justify the spacing of the drainage pipes within the sand drainage layer based on HELP model results.
- f. Discuss whether the project requires the removal of any trees, particularly on the east side of the project area. If tree removal is required, discuss the potential for the Phase A and Phase B areas to become visible from nearby residences.
- g. Confirm whether a Request for determination of Applicability or a Notice of Intent is required to be submitted for any proposed work.
- h. Consider adding stone to the west side plateau berm as this berm collects significant surface stormwater runoff from Phase A and Phase B.

5. Comments on Drawing #5:

- a. Provide dimensions for the extent of the 2” crushed stone in the stormwater swale at the plateau berm on the “Anchor Trench Detail”.

- b. Provide dimensions for the lateral extent of rip-rap and the trough depth on the “Typical Access Road Section Detail”.
- c. On the “Proposed Existing Waste Gas Vent Well” detail, provide the vent well boring diameter and the backfill material proposed for the existing waste vents.
- d. The “Proposed Existing Waste Gas Vent Well” detail includes the notation “Extend vent to observed groundwater level. This should be revised to include (... or to the bottom of waste, whichever is higher”.
- e. Narrative section 3.1.2 states the existing waste gas collection wells will be connected by a header system to a vent on the “east side of the site”. On Drawing 5, the “Proposed Existing Waste Gas Vent Well” detail includes the notation “Header to other gas vent wells”. Drawing 3 indicates header pipes are proposed between the 4 existing waste gas collection wells, but does not indicate a header to a passive vent.

To ensure that landfill gas is adequately vented, each vent should extend above grade to a passive vent. Each passive vent should be constructed to allow closure (capping) of the vent, should the passive landfill gas venting system need to be retrofitted to an active gas collection system at a later date.

MassDEP also requests that the locations of proposed future header pipes be shown for future retrofitting to an active gas collection system if necessary.

A detail should also be provided illustrating how the passive vents installed within the Re-Crete material would be converted for the connection of the header for the active system and capped to eliminate passive venting.

- f. The “Typical Access Road Section” detail indicates the sand drainage layer will discharge into the stone swale at the edge of the access road. The access road and perimeter swale are not located adjacent to the toe of slope in the northeast corner of Phase B (near Pond No. 1) or along the west side of phase B (adjacent to the “Staging and Preliminary Sedimentation Area”). Provide a detail illustrating the sand drainage outlet where no swale/access road is intended.
- g. Provide design details with all appropriate dimensions for the following:
 - i. the discharge end of the stormwater downspouts;
 - ii. the discharge ends of pond (stormwater basin) 1, 2, and 3 outlets;
 - iii. the inlet, outlet, and cross section of the access road crossing piping;
 - iv. the Pond No. 3 emergency spillway show on Drawing 3, and
 - v. proposed emergency spillways at Ponds No.1 and No. 2 and the access road in the vicinity of the “Staging and Preliminary Sedimentation Area”, if any.

For each basin outlet detail, indicate the existing ground elevations at the point of discharge.

Pursuant to 310 CMR 4.04(2)(c).1 *Submittals During Departmental Review Periods*, the Department may request additional information from the Applicant during any Departmental review period without extending or reducing the time provided in the schedule for the Department to complete such review and the Department may specify a reasonable time within which the Applicant may provide such additional information. Accordingly, MassDEP requests that the additional information be submitted within 30 days of the date of this Determination of Administrative Completeness with Technical Comments.

If you have any questions regarding the review of this application, please contact me at (508) 946-2847 or Dan Connick at (508) 946-2884 or at the letterhead address.

Very truly yours,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Mark Dakers, Chief
Solid Waste Management Section
Bureau of Air and Waste

D/DC

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Communication For Non-English Speaking Parties - 310 CMR 1.03(5)(a)



1 English:

This document is important and should be translated immediately. If you need this document translated, please contact MassDEP's Diversity Director at the telephone numbers listed below.



2 Español (Spanish):

Este documento es importante y debe ser traducido inmediatamente. Si necesita este documento traducido, por favor póngase en contacto con el Director de Diversidad MassDEP a los números de teléfono que aparecen más abajo.



3 Português (Portuguese):

Este documento é importante e deve ser traduzida imediatamente. Se você precisa deste documento traduzido, por favor, entre em contato com Diretor de Diversidade da MassDEP para os números de telefone listados abaixo.



4(a) 中國（傳統）(Chinese (Traditional)):

本文件非常重要，應立即翻譯。如果您需要翻譯這份文件，請用下面列出的電話號碼與MassDEP的多样性總監聯繫。



4(b) 中国（简体中文）(Chinese (Simplified)):

本文件非常重要，應立即翻譯。如果您需要翻譯這份文件，請用下面列出的電話號碼與MassDEP的多样性總監聯繫。



5 Ayisyen (franse kreyòl) (Haitian) (French Creole):

Dokiman sa-a se yon bagay enpòtan epi yo ta dwe tradui imedyatman. Si ou bezwen dokiman sa a tradui, tanpri kontakte Divèsite Direktè MassDEP a nan nimewo telefòn ki nan lis pi ba a.



6 Việt (Vietnamese):

Tài liệu này là rất quan trọng và cần được dịch ngay lập tức. Nếu bạn cần dịch tài liệu này, xin vui lòng liên hệ với Giám đốc MassDEP đa dạng tại các số điện thoại được liệt kê dưới đây.



7 ប្រទេសកម្ពុជា (Kmer (Cambodian)):

ឯកសារនេះគឺមានសារៈសំខាន់និងត្រូវបានបកប្រែភាសា ប្រសិនបើអ្នកត្រូវបានបកប្រែ ឯកសារនេះសូមទំនាក់ទំនងជាមួយកម្មាធិការ MassDEP នៅលេខទូរស័ព្ទដែលបានរាយនាមក្រោម។



8 Kriolu Kabuverdianu (Cape Verdean):

Es documento é importante e deve ser traduzido imidiatamente. Se bo precisa des documento traduzido, por favor contacta Director de Diversidade na MassDEP's pa es numero indicode li d'boche.



9 Русский язык (Russian):

Этот документ должен быть немедленно. Если вам нужна помощь при переводе, свяжитесь пожалуйста с директором по этике и разнообразию в MassDEP по телефону указанному ниже.



10 العربية (Arabic):

هذه الوثيقة الهامة وينبغي أن تترجم على الفور. إذا كنت بحاجة إلى هذه الوثيقة المترجمة، يرجى الاتصال مدير التنوع في MassDEP على أرقام الهواتف المدرجة أدناه.



11 한국어 (Korean):

이 문서는 중요하고 즉시 번역해야 합니다. 당신이 번역이 문서가 필요하면 아래의 전화 번호로 MassDEP의 다양성 감독에 문의하시기 바랍니다.



12 հայերեն (Armenian):

Այս փաստաթուղթը շատ կարևոր է եւ պէտք է թարգմանել անմիջապես. Եթե Ձեզ անհրաժեշտ է այս փաստաթուղթը թարգմանվել դիմել MassDEP բազմազանությունը տնօրեն է հեռախոսահամարների թվարկված են ստորև.



13 فارسی (Farsi [Persian]):

این سند مهم است و باید فوراً ترجمه شده است. اگر شما نیاز به این سند ترجمه شده، لطفاً با ما تماس تنوع مدیر MassDEP در شماره تلفن های ذکر شده در زیر.



14 Français (French):

Ce document est important et devrait être traduit immédiatement. Si vous avez besoin de ce document traduit, s'il vous plaît communiquer avec le directeur de la diversité MassDEP aux numéros de téléphone indiqués ci-dessous.



15 Deutsch (German):

Diese Dokument ist wichtig aund sollte sofort übersetzt werden. Wenn Sie die Übersetzung von diesem Dokument benötigen, wenden Sie sich bitte bei der/dem Diversity Director MassDEP an die unten aufgeführte Telefonnummer.



16 Ελληνική (Greek):

Το έγγραφο αυτό είναι σημαντικό και θα πρέπει να μεταφραστούν αμέσως. Αν χρειάζεστε αυτό το έγγραφο μεταφράζεται, παρακαλούμε επικοινωνήστε Diversity Director MassDEP κατά τους αριθμούς τηλεφώνου που αναγράφεται πιο κάτω.



17 Italiano (Italian):

Questo documento è importante e dovrebbe essere tradotto immediatamente. Se avete bisogno di questo documento tradotto, si prega di contattare la diversità Direttore di MassDEP ai numeri di telefono elencati di seguito.



18 Język Polski (Polish):

Dokument ten jest ważny i powinien być natychmiast przetłumaczone. Jeśli potrzebujesz tego dokumentu tłumaczone, prosimy o kontakt z Dyrektorem MassDEP w różnorodności na numery telefonów wymienionych poniżej.



19 हिन्दी (Hindi):

यह दस्तावेज महत्वपूर्ण है और तुरंत अनुवाद किया जाना चाहिए. आप अनुवाद इस दस्तावेज की जरूरत है, नीचे सूचीबद्ध फोन नंबरों पर MassDEP की विविधता निदेशक से संपर्क करें.