MassDEP
Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs
Department of Environmental Protection
Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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March 4, 2011

Jerome Gagliarducci
Cottage Developers, LLP
295 Pasco Road
P.O. Box 296
Springfield, MA 01151

Carl Frattini
Western Massachusetts Electric Company
1 Federal Street, Building 111, 4th Floor
Springfield, MA 01105

Re. Springfield - SWM - Landfill
Photovoltaic Power System
Cottage Street Landfill
BWP SW 36; Transmittal No. X235137
File No. 11-281-023

Dear Mr. Gagliarducci and Mr. Frattini:

The Department of Environmental Protection, Western Regional Office ("MassDEP"), has reviewed the following post-closure use application for the Cottage Street Landfill, which was received on November 12, 2010:

BWP SW 36
Post-Closure Use - Major Permit Application
Western Massachusetts Electric Company
Cottage Street Landfill
282 Cottage Street
Springfield, Massachusetts
November 2010
(One volume bound text and 11 bound plan sheets)

The application proposes to construct a 4.9 megawatt ("MW") photovoltaic ("PV") system on the closed Cottage Street Landfill ("Landfill").

Weston & Sampson Engineers, Inc. of Peabody, MA prepared the application on behalf of the system developer, Western Massachusetts Electric Company ("WMECO"), and the Landfill owner, Cottage Developers, LLP. The application and accompanying design plans are signed and stamped by Duane C. Himes, Massachusetts Professional Civil Engineer No. 32336.

On January 28, 2011, Weston & Sampson submitted modified plans (including a complete revised set of 12 plan sheets) making a number of changes to the project. The submittal also contains supplemental information in response to MassDEP questions regarding the original application.

The Landfill is owned by Cottage Developers, LLP. However, Waste Management of Massachusetts ("WMM") managed the Landfill during the final closure project, including the acceptance and placement of shaping and grading materials and the installation of the final cover system. WMM continues to operate the landfill gas collection and treatment system and conduct post-closure maintenance and monitoring.

Background Information and Project Summary

The Landfill is an unlined landfill that operated from the 1950s until approximately 1970. A final cover system was built over the Landfill from 2004 - 2008 in a project managed by WMM. The Landfill is located on 63 acres south of Cottage Street in Springfield, Massachusetts. Cottage Developers owns a 53-acre parcel and the remaining 10 acres are on portions of other lots north of the 53 acre parcel. The PV system will be constructed on the portion of the Landfill owned by Cottage Developers.

The closure project originally anticipated a post-closure use as recreation space (e.g. soccer fields). However, as the project progressed, the Landfill began to generate substantial quantities of landfill gas containing hydrogen sulfide. An extensive landfill gas control system, consisting of vertical collection wells and horizontal collectors, header pipes, condensate traps, a blower station, hydrogen sulfide pretreatment, and a gas flare, was needed to prevent subsurface gas migration and releases to the ambient air.

Due to landfill gas generation and the presence of the gas control system, it was decided that recreation-related improvements would be implemented offsite at Marshal Roy Park and the Samuel Bowles Elementary School in Springfield. As a result, the closed Landfill surface is currently unused and covered with grassy vegetation in accordance with the closure plans.

The final cover system design is summarized in the table below:

Table: Cap components listed from top to bottom.

Component	Purpose
Vegetative cover with erosion control	Control erosion and promote evapotranspiration of stormwater.
9 - 12" vegetative support soil	Soil layer suitable for growing appropriate vegetation to stabilize surface and prevent erosion.
12" sand with hydraulic conductivity $> 1.0\times10^{-3}$ cm/sec	Drainage of stormwater impacting cap, protection of underlying cap.

Component	Purpose
40-mil HDPE flexible membrane liner (FML)	Impermeable barrier layer
6" processed boiler aggregate (PBA) or sand with hydraulic conductivity $> 1.0\times10^{-3}$ cm/sec	Landfill gas venting layer (allows gas to migrate to collection points and/or passive vents).
Subgrade - approved beneficially reused shaping and grading materials	Brings landfill surface to design closure subgrades. Foundation for overlying final cover.

Summary of Post-Closure Use

WMECO proposes to construct, operate, and maintain an approximate 4.9 MW solar photovoltaic system on the surface of the closed Landfill, as summarized below. Additional detail is provided on certain aspects of the proposal in the following sections.

- The system will consist of about 17,000 PV panels installed on a steel racking system anchored by concrete ballasts. The panels will be located only on the relatively flat top of the Landfill (grades generally 2 - 8%).

- The concrete ballasts will have a low bearing pressure to avoid damage to the cover system. The vegetative support layer will be removed under each ballast, but the underlying sand drainage layer will not be affected.

- The panels will be electrically connected by above-ground cables and conduits to seven inverter/transformer pairs, each of which will be located on the cap near the specific segment of the PV array served by the equipment. The inverters and transformers will be mounted on individual concrete pads.

- Electrical connections between the PV array, inverters, and transformers, as well as the trunk line connecting the transformers to each other and ultimately to the electrical grid, will generally be made via aboveground cables running in conduits. However, the cables and conduits will run underground for short distances where necessary for road crossings.

- The electrical trunk line will terminate at a new crushed stone parking area north of the Landfill and adjacent to Cottage Street. The plans indicate that electrical switchgear necessary for grid connection will be preferably pole mounted. However, if pole mounting isn't possible, the switchgear will be located on a concrete pad surrounded on three sides by a landfill gas venting trench.

- Temporary and permanent gravel access roads will be constructed to facilitate construction and maintenance of the PV system.

- The existing landfill gas collection system will undergo several modifications. A number of wellheads will be removed and a number of subheader/lateral pipes will be abandoned in place. Additional landfill gas header pipe will be constructed to provide connection to wells that will remain active. A number of existing horizontal collectors will remain in place to collect gas in the project area.

- A total of 16 existing settlement platforms will be removed for construction purposes. These will be replaced by 5 new settlement platforms.

- Grass under the panels will be reseeded with a shade-tolerant mix.

- Additional fencing will be constructed to provide security for the new PV system.

- The project will not substantially alter or negatively affect the topography, stormwater runoff controls, groundwater wells, or gas monitoring wells.

- Operation, maintenance, and monitoring of the Landfill (i.e. apart from the PV system itself) will not change significantly as a result of the project

Additional detail on the project is provided below.

Panel System Foundation

The panel foundation system (concrete ballasts) will be installed on the landfill cap. The vegetative support soil will be excavated at each ballast location, down to the top of the sand drainage layer. A layer of woven filter fabric will be placed on the sand, followed by 4 inches of crushed stone. The ballast will then be placed on the crushed stone. The application includes calculations showing that the pressure on the liner (i.e. HDPE barrier layer) surface, including the ballasts, steel rack system, and PV panels, will not exceed 1.4 pounds per square inch ("psi"). It should be noted that low ground pressure equipment will generally be used during construction, resulting in a maximum loading of 5 psi or less on the liner.

According to the application, the estimated amount of differential settlement will not adversely affect system performance, except that periodic realignment of the rack system may be necessary.

Access Roads

The plans indicate that both permanent and temporary access roads will be constructed over the cap during the project. Permanent access roads will be built by removing the existing vegetative support soil down to the sand drainage layer, placing woven filter fabric on the sand, and backfilling to match previous grades with dense-graded crushed stone. Roads constructed in this manner are intended to be used by vehicles weighing up to 8,000 pounds, which is consistent with the weight of a large pickup truck.

Temporary roads will be built over the permanent roads. They will consist of the permanent road design with an additional 1.5 feet of dense-graded crushed stone above existing grades. At the conclusion of construction, the extra stone will be removed to return to the previous grades. Heavier construction vehicles will be allowed to operate only on the temporary roads. Calculations in the application indicate that the maximum allowable axle load from construction vehicles is 12,000 pounds, based on a maximum permissible pressure of 5 psi on the liner. The construction contractor and on-site engineer will be required to verify vehicle weights prior to start of construction.

Electric Cable Routing

The panels will be connected to each other and the inverter/transformer stations by aboveground electrical conduits. This design is intended to minimize the possibility that landfill

gas could enter the conduit and create a health or safety hazard. The conduits will have air-tight explosion proof fittings wherever they enter transformers and inverters. The aboveground conduits will be supported a minimum of 8 inches above the surface by small concrete posts installed similarly to the ballasts, as described above. The transformers will be connected to each other, and ultimately to the electrical grid interconnection point, via an aboveground electrical trunk line. However, the trunk line will be routed underground for short distances at road crossings.

The belowground road crossings by the electrical conduit will be made through a concrete ductbank, which is a pre-cast flat concrete structure with holes that allow the conduit to pass through. The conduit will be equipped with air-tight explosion proof fittings at both ends of the crossing points. At the crossing points, the roads will be built up with an additional 24 inches of gravel over the ductbank.

Inverters, Transformers, and Switchgear

The initial proposal called for a single inverter/transformer station located off the Landfill near Cottage Street. The proposal has been modified to provide for seven inverter/transformer pairs, each of which will be located on the landfill cap near the specific segment of the PV array served by this equipment. The inverters and transformers will be mounted on individual 8-inch thick concrete pads underlain by a 4-inch thick layer of crushed stone and a layer of geotextile. Similar to the PV panel ballasts, the vegetative support layer will be removed and the geotextile, crushed stone, and concrete will be placed on the sand drainage layer.

The inverters will be installed in cabinets 92.6 inches high × 153.8 inches wide × 43.1 inches deep. The transformers will be supplied with terminal cabinets having dimensions of 54.5 inches high × 66 inches wide × 18 inches deep. The inverter cabinets are constructed with louvers for ventilation. The transformer cabinets, while not provided with intentional ventilation, are not constructed to be gas-tight. The transformers themselves are sealed and oil-filled, meaning that landfill gas cannot enter or collect within them. Therefore, the cabinets and transformers are unlikely to present an explosion hazard because they should not collect landfill gas. The aboveground conduits entering and leaving this equipment will have air-tight explosion proof fittings.

The application contains an analysis demonstrating that the new concrete inverter and transformer pads will present a bearing pressure of less than 5 psi on the HDPE liner.

The electrical trunk line will terminate at a new crushed stone parking area north of the Landfill and adjacent to Cottage Street. This area is outside the limits of the Landfill, but subsurface landfill gas migration into the area is possible. Therefore, the plans indicate that electrical switchgear necessary for grid connection will be preferably pole mounted. However, if pole mounting isn't possible, the switchgear will be located on a concrete pad surrounded on three sides by a landfill gas venting trench (the 4th side faces Cottage Street, away from the Landfill).

From the switchgear, connection to the electric grid will be made via overhead electrical wires.

If needed for pad-mounted switchgear, the gas venting trench is proposed to be 22 inches deep by 1 foot wide, except at the riser locations, which will be 1 foot wide and 10 feet deep. The top of the trench will be set 8 inches below grade. The trench will be lined with non-woven filter fabric, and filled with washed crushed stone.

The initial proposal indicated that the gas venting trench would be 10 feet deep throughout its length. Historic groundwater data at a nearby monitoring well, MW-10, appears to indicate that the bottom of a 10-foot deep trench would intercept the typical range of groundwater elevations. Therefore, landfill gas would not be able to pass under the trench. However, the modified design would result in the bottom of the trench being only 2.5 feet below grade, which is not deep enough to prevent landfill gas from passing between the bottom of the trench and the top of groundwater. Therefore, this permit requires that the gas venting trench, if constructed, must be at least 10 feet deep below existing grade.

The gas venting trench will contain vertical 6-inch perforated PVC pipes spaced at 25-foot intervals. The vertical pipes will be connected to each other by a horizontal perforated pipe located about 2 feet below grade. The vertical pipes will be fitted to solid-wall PVC risers having a minimum height of 8 feet above grade. A 3-foot diameter concrete collar 8 inches in thickness will be provided at each riser location. The trench is a passive venting system, as there will be no connection to the Landfill's active gas collection system.

Currently there is not a landfill gas monitoring well in the area of the inverter/transformer station. This permit requires that one be installed adjacent to the switchgear station and gas venting trench, in the event that the equipment cannot be pole-mounted.

The plans depict that a pole-mounted light fixture will be installed in the inverter/transformer area. WMECO has informed MassDEP that it has eliminated the light fixture from the project.

Landfill Gas System Modifications

The Landfill contains an extensive network of vertical landfill gas collectors (i.e. wells) and horizontal collectors, along with a system of solid-wall headers and laterals to convey the gas to the blower/flare station. The gas is potentially hazardous because it contains enough methane to support combustion, toxic levels of hydrogen sulfide, and is a potential asphyxiant due to high levels of carbon dioxide and low levels of oxygen. At lower concentrations, it can generate a nuisance condition due to malodors such as hydrogen sulfide and other characteristics.

Due to the hazardous and nuisance-generating nature of the landfill gas, it is collected and then treated at the flare station by passing it through a hydrogen sulfide absorption media and then combusting it in an enclosed flare.

The top of the landfill where PV panels will be installed contains numerous existing landfill gas wells and horizontal gas collectors under the cap. The vertical wells have aboveground wellheads that could be damaged during construction and/or operation of the PV system. Many of the vertical wells are currently not in use because nearby horizontal collectors provide adequate control in a given area and/or the gas quality indicates that collection is unnecessary in that location. As a result, the application proposes to decommission a number of wells and abandon the subheader/lateral lines that serve them.

The application proposes to decommission 13 vertical wells and 1 horizontal collector. The decommissioning procedure for the vertical wells will include opening the cap at the well location, removing the well head, connector, and valve, overdrilling the well to a minimum of 5 feet below the gas venting layer, backfilling the remaining PVC well casing and the bore hole with crushed stone, repairing the HDPE liner, and backfilling the hole with sand and vegetative

support soil. At each wellhead, the connection to the header will be capped to prevent gas flow into the header. The abandoned headers and laterals will be left in place. Additional headers and laterals will be installed above the HDPE liner of the cap in five locations.

A 5-foot radius construction barrier will be provided around gas wells and valves left in place within the PV system area to protect them and provide access for future inspections and maintenance.

Settlement Platforms

There are a total of 16 existing settlement platforms within the work area (also labeled as settlement plates on the plans). The application proposes to remove the platforms so that they won't interfere with PV panel layout or maintenance. Five replacement settlement platforms are proposed. The application notes that the existing settlement platforms are not used, so a reduction in number should not negatively affect landfill monitoring) The platforms will consist of 1-foot by 1-foot steel plates welded to a 1" vertical steel pipe with a painted cap on top of the pipe. The platforms will rest on the top of the sand drainage layer of the cap. They will be removed and installed by hand excavation to avoid any damage to the HDPE liner.

Stormwater and Erosion Controls

Surface storm water runoff controls were constructed as part of the final cover system to maintain the integrity of the final cover and prevent ponding of water on the areas of final cover. The storm water control system includes earthen diversion berms on the side slopes, side slope let-down channels, perimeter swales, and a large retention basin. Generally, the project will not affect the existing stormwater controls at the Landfill.

A drip edge splash pad will be installed below each PV panel, consisting of a 12-inch wide by 3" thick layer of 1.5" crushed stone, which will be laid on woven filter fabric.

The application contains an analysis of stormwater impacts, taking into consideration such factors as the increase in impervious area and the new drip edge splash pads. The analysis concludes that the stormwater impacts from the project are negligible.

The application proposes to use typical erosion and sedimentation controls during the construction period, such as silt fence, hay bales, and erosion control matting. It specifies the use of wood chip berms on the cap instead of silt fence/hay bales to avoid damage from stakes.

The existing vegetation in the PV panel area will be reseeded with a shade-tolerant mix of grasses, as shade from the panels may stress the existing vegetation.

The upper surface of the Landfill has a network of underdrain pipe installed in the sand drainage layer. The application proposes to augment this system with additional underdrain pipes in 4 locations.

Shallow retention basins for stormwater control are proposed to be constructed around the crushed stone parking area off Cottage Street.

Fencing

The application proposes to construct an 8-foot high fence on the landfill cap. An alternative pole foundation design is specified to avoid damaging the cap. The alternative foundation will be constructed by removing the vegetative support soil down to the sand drainage layer at each fence post location, installing a 4-foot by 4-foot by 1-foot deep concrete pad, and anchoring the fence post to the pad using epoxy (the fence post will have a steel plate that will rest on the concrete surface).

Determination

This permit approval is issued pursuant to Massachusetts General Laws Chapter 111, Section 150A and 310 CMR 19.000, subject to the conditions set forth below and the standard conditions at 310 CMR 19.043(5) and any amendments thereto. In the event this permit conflicts with all or parts of prior plan approvals or permits issued pursuant to c. 111, s. 150A or solid waste regulations in effect prior to July 1, 1990 the terms and conditions of this permit shall supersede the conflicting provisions of the prior permits or approvals. This permit does not convey property rights of any sort or any exclusive privilege.

Conditions

1. The PV system shall be constructed in accordance with the plans and specifications referenced above, except as may be modified by this permit or otherwise approved by MassDEP in writing.

2. A third-party, qualified engineering consultant (the on-site engineer) shall be present on-site at all times when any construction work is taking place on the cap. The on-site engineer shall have sufficient staff on-site to provide quality assurance/quality control (QA/QC) oversight for all construction work at the site, and shall submit monthly construction progress reports to MassDEP, which shall summarize the work performed during the month. At the end of construction work, the third-party engineering consultant shall submit a completion report, signed and stamped by a Massachusetts-registered Professional Engineer, certifying that the work was completed in accordance with the application and the conditions of this permit.

3. Cottage Developers and WMECO are responsible to ensure that all necessary precautions are taken to protect the health and safety of workers and the general public during both construction and maintenance of the PV system. A site-specific Health and Safety Plan for the construction and maintenance of the PV system shall be submitted to MassDEP prior to the beginning of any construction work, which shall include protocols for monitoring of landfill gas as needed and protocols for modifying work practices if landfill gas is detected at levels deemed unsuitable. The Health and Safety Plan shall address, in detail, the hazards posed by landfill gas and hydrogen sulfide. The plan shall be provided to, and reviewed with, all site workers, contractors, and maintenance staff prior to entering the site.

4. All disturbance of the landfill cap shall be limited to the proposed excavations and installations within and on top of the vegetative support layer of the cap, except for landfill gas collection system work and cap underdrain installation, as depicted and described in the approved plans and specifications. No other excavations or other penetrations shall be

performed into the sand drainage layer of the cap without separate written approval from MassDEP. There shall be no penetrations (utility, conduit or other) at the base of any concrete footings or foundations. There shall be no penetrations of any kind of the HDPE impermeable layer (i.e. liner) of the cap.

5. Cottage Developers, WMECO, and their contractor(s) are responsible to ensure that the inverter and transformer enclosures on the landfill cap area will not accumulate landfill gas within the enclosures during the construction and operation of the PV system. Any landfill gas levels exceeding 10% of the Lower Explosive Limit (% LEL) within an inverter or transformer enclosure shall trigger the requirements of 310 CMR 19.132(4)(g), for notification and action. The additional requirements for the enclosures include the following:

   A. Each enclosure shall be ventilated, and the floor of each enclosure shall be solid, with no openings for landfill gas to enter at the floor level; and
   B. There shall be no utility, conduit or any other penetrations at the base of the enclosures or their foundations; i.e. – all utility penetrations shall enter only through the side of the enclosure, not the bottom, and these penetrations shall be fully sealed;

6. Gas-tight seals shall be placed in the electrical conduits wherever they enter or leave any transformer, inverter, or switchgear (if pad-mounted).

7. All necessary precautions shall be taken to ensure that the proposed construction and maintenance work associated with the PV system shall not in any way damage the impermeable layer of the landfill cap, landfill stormwater control structures, landfill monitoring wells, or the landfill gas collection system. If any damage occurs to any of the above-listed landfill components, Cottage Developers and/or WMM shall notify MassDEP immediately (within 24 hours maximum), a written plan for repair of the components shall be submitted to MassDEP within 48 hours, and any repair work shall be completed on a schedule determined by MassDEP.

8. Prior to the commencement of construction activities, all landfill gas vents, landfill gas collection wells, monitoring wells and other existing, above-ground structures of the landfill cap and appurtenances shall be flagged for visibility, and protective barriers shall be placed around such structures as needed to prevent damage by vehicles accessing the cap area.

9. Vehicles operating on the landfill cap shall only operate on the designated access roads, except for construction equipment presenting a ground pressure on the HDPE liner of 5 psi or less when operated off the access roads. The on-site engineer and contractor shall verify the ground pressure of all equipment prior to allowing it to operate on the cap. All operators of vehicles entering the cap area shall be clearly instructed by the on-site engineer and/or the contractor of the requirements of this permit prior to arrival, to avoid damage to the landfill cap components. Excavations into the vegetative support layer of the cap shall not be performed using a toothed excavation bucket, and the on-site engineer shall observe the full extent of each such excavation. If MassDEP determines that the use of excavation equipment is creating the potential for damage to the impermeable cap layer, the usage of such equipment shall cease immediately upon notification by MassDEP, and all remaining excavation work on the cap shall be performed by hand digging.

10. During the first year of operation of the PV system, inspections of the landfill cap shall be performed on a monthly basis, and monthly inspection reports shall be submitted to

MassDEP. Following the first year of operation of the PV system, inspections of the landfill cap shall be performed on a quarterly basis, and quarterly inspection reports shall be submitted to MassDEP. Any erosion problems, settlement problems, or other issues observed on the landfill cap shall be reported to MassDEP and repaired immediately.

11. This post-closure use permit shall be valid for a period of 30 years from the date of this permit, provided that MassDEP may amend the term of the permit in accordance with an approved modification pursuant to either 310 CMR 19.039 or 19.040. If Cottage Developers or any successor owners/operators intends to operate the PV system after the expiration of this permit, such entity is required to submit a request for a renewal of the permit at least 90 days prior to the expiration of the permit.

12. If it is determined that the switchgear needed for grid interconnection must be installed on a concrete pad instead of being pole-mounted, a landfill gas monitoring well shall be installed within the area delineated by the landfill gas venting trench around that pad, and shall be monitored for the same parameters and same frequency as the other landfill gas monitoring wells at the Landfill. The landfill gas venting trench must be at least 10 feet deep (referenced to existing ground elevation) throughout its length.

13. MassDEP and its agents and employees shall have the right to enter upon the landfill at all reasonable times, to inspect the landfill and any equipment, structure or land located thereon, take samples, recover materials or discharges, have access to and photocopy records, to perform tests and to otherwise monitor compliance with this Permit and all environmental laws and regulations. This right of entry and inspection shall be in addition to MassDEP's access authorities and rights under applicable federal and states laws and regulations, as well as any permits or other agreements between the Permittee and MassDEP.

14. MassDEP reserves the right to require additional or increased monitoring or maintenance activities in the event that the post-closure use is or may be having a detrimental effect on the landfill cap or appurtenances. MassDEP reserves all rights to suspend, modify or rescind this permit, should the conditions of this permit not be met, should the PV system create nuisance conditions or threats to public health, safety or the environment, or should MassDEP otherwise determine that continued post-closure use is negatively impacting the landfill cap or appurtenances. The management of actual or potential nuisance conditions and the prevention of threats to public health or safety from any aspect of the management of the Landfill shall take precedence over the operation and maintenance of the PV system.

This approval pertains only to the Solid Waste Management aspects of the proposal and does not negate the responsibilities of the owners or operators to comply with any other local, state, or federal laws, statutes and regulations or enforcement actions, including orders issued by another agency now or in the future. Nor does this approval limit the liability of owners or otherwise legally responsible parties from any other applicable laws, statutes or regulations now or in the future.

Pursuant to 310 CMR 19.037(5), any person aggrieved by the issuance or denial of this permit decision, except as provided for under 310 CMR 19.037(4)(b), may file an appeal for judicial review of said decision in accordance with the provisions of M.G.L. c. 111, s. 150A and c. 30A not later than thirty [30] days following the receipt of the final permit. The standing of a person to file an appeal and the procedures for filing such appeal shall be governed by the provisions of

M.G.L. c. 30 A. Unless the person requesting an appeal requests and is granted a stay of the terms and conditions of the permit by a court of competent jurisdiction, the permit decision shall remain effective or become effective at the conclusion of the thirty [30] day period.

Any aggrieved person intending to appeal the decision to the superior court shall provide notice to the Department of said intention to commence such action. Said Notice of Intention shall include the Department File Number (11-281-023) and shall identify with particularity the issues and reason(s) why it is believed the approval decision was not proper. Such notice shall be provided to the Office of General Counsel of the Department and the Regional Director for the regional office which made the decision. The appropriate addresses to which to send such notices are:

General Counsel
Department of Environmental Protection
One Winter Street-Third floor
Boston, MA 02108

Regional Director
Department of Environmental Protection
436 Dwight Street - Fifth Floor
Springfield, MA 01103

No allegation shall be made in any judicial appeal of this decision unless the matter complained of was raised at the appropriate point in the administrative review procedures established in those regulations, provided that matter may be raised upon a showing that it is material and that it was not reasonably possible with due diligence to have been raised during such procedures or that matter sought to be raised is of critical importance to the public health or environmental impact of the permitted activity.

MassDEP reserves the right to rescind or modify this permit approval or to require additional operating conditions, should available information indicate such a need.

If you have any questions or comments regarding any of the matters stated above in this permit, please contact Jim Scheffler of my office at (413) 755-2127.

Sincerely,

Daniel Hall
Solid Waste Chief
Bureau of Waste Prevention
Western Region

JPS/jps

cc: City of Springfield Department of Health and Human Services
Allan Chwalek - Springfield Department of Public Works
Duane Himes, PE - Weston & Sampson
Bob Magnusson and Steven Joyce - Waste Management of Massachusetts
Kathy Brown - East Springfield Neighborhood Council
Peter Czapienski - DEP WERO (electronic)
Paul Emond - DEP Boston