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## MEMORANDUM

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**To:** Mark E. Baldi, MassDEP  
Paul D. Vigeant, MassDEP

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**Cc:** David Burton, MCGI  
William Scott, MCGI  
TERRA Environmental, LLC Project File

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**From:** Philip M. Peterson, LSP

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**Date:** September 7, 2018

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**Subject:** **Soil Management Plan**  
**Nashua Road Quarry Reclamation Project**  
**Response to MassDEP comments, dated July 19, 2018**

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TERRA Environmental, LLC (TERRA) has prepared this memorandum with our responses to MassDEP's comments provided in their July 19, 2018 Memorandum.

**Soil Management Plan – MassDEP Comments:**

- **MassDEP Comment 1:** Page 1 states that the intended fill material will include native deposits of soil, including sand, gravel, organic soils, estuarine deposits, marine sands, glacial till, clay, fill soils, and soil/slurry mixtures from foundation installations. The Proponents should delete the phrase "and soil/slurry mixtures from foundation installations". MassDEP will require that soil/slurry mixtures must contain less than 1% by volume of bentonite or other slurry material to be accepted. The pH of the soil/slurry mix must be tested after the mixing occurs and at a rate of one test per 50 cubic yards.
  - **Response 1:** The SMP be will be revised to reflect MassDEP's comment that MassDEP will require that soil/slurry mixtures must contain less than 1% by volume of bentonite or other slurry material to be accepted. The pH of the soil/slurry mix must be tested after the mixing occurs and at a rate of one test per 50 cubic yards.
  
- **MassDEP Comment 2:** Page 4 states that no filling or disturbance will take place within 100 feet of any wetlands, as indicated on the Site Plans, and that the Project does not require a wetland permit or special permits from NHESP or MESA. I am unable to confirm these statements based on the plans that were submitted with the SMP. The Conceptual Reclamation Study Plan (Construction Drawing Sheet CDOOI) appears to show fill extending into the 200-ft. Riverfront Area and the Priority Habitat area at the southeastern corner of the

fill area and into the 100-ft. wetland buffer zone near the southwestern corner of the Property.

- o **Response:** Agreed. Reclamation will be performed outside of buffer zones, including wetlands (100'), Riverfront (200') and the Priority Habitat (100'). To address this comment, Oxbow Associates and Landtech are currently working to update and finalize documents that will show that reclamation will be performed outside of these areas. Oxbow anticipates submitting an Abbreviated Notice of Resource Delineation (ANRD) and updated final construction drawings. The SMP will be updated and resubmitted to MassDEP under a sperate cover.
- **MassDEP Comment 3:** Page 4 states that the wetlands, NHESP and MESA permitting issues have been addressed by Oxbow Associates, Inc. as detailed in Appendix A. This does not appear to be accurate. In their January 29, 2018 letter to MCGI, Oxbow recommended filing an Information Request with NHESP to determine which species are associated with the area and determine whether NHESP may regulate the entire property under the MA Endangered Species Act. Oxbow also stated that the wetland boundary delineations must be reviewed approved by the Pepperell Conservation Commission to be legally affirmed. The Proponents should provide either an Order of Resource Area Delineation or a Determination of Applicability issued by the local Conservation Commission. The ORAD or RDA should include confirmation of the 100-year flood boundary as well as any bordering vegetated wetlands.
  - o **Response:** As discussed in **Response 2**, agreed that reclamation will be performed outside of buffer zones, including wetlands (100'), Riverfront (200') and the Priority Habitat (100'). In addition, the 100-year flood plain boundary and bordering vegetative wetlands will be included in final construction drawings. To address this comment, Oxbow Associates and Landtech are currently working to update and finalize documents, including an Abbreviated Notice of Resource Delineation (ANRD) and Final construction drawings. Accordingly, the SMP will be updated and resubmitted to MassDEP under a separate cover.
- **MassDEP Comment 4:** Page 4 states that a draft Storm Water Pollution Prevention Plan (SWPPP) will be submitted within 30 days of starting land disturbance activities. In accordance with Policy #COMM-15-01, MassDEP will require a detailed Stormwater Management Plan to prevent impacts to sensitive receptors during and post-construction.
  - o **Response 4:** The project's Civil Engineer (Landtech) is currently working to update and finalize construction drawings. Drawings will include details regarding stormwater control and management during construction and post-construction. In addition, a detailed Stormwater Management Plan will be included with the updated SMP submitted to MassDEP under a separate cover.
- **MassDEP Comment 5:** Page 4 states that the Reportable Concentration (RC) category applicable to the Site is RCS-2 for soil. This characterization appears to be inaccurate. The properties to the south and west, across Nashua Street, are zoned Residential. Therefore, the southern and western portions of the Property within 500 feet of these Residential zones should be characterized as RCS-1.
  - o **Response 5:** The project's Civil Engineer (Landtech) is currently working to update and

finalize construction drawings to show a 500-ft radius from the fill area to residentially zoned property. Please note that the residentially zoned property to the southern and western portions of the Property are owned by Mr. Burton. As discussed during our recent meeting with MassDEP, MCGI will place a deed restriction on the abutting property that is within 500-ft of the fill area. As appropriate, the SMP will be updated and resubmitted to MassDEP under a separate cover.

- **MassDEP Comment 6:** Page 5 states that groundwater at the Site meets the criteria of groundwater category RCGW-2. A portion of the Zone II for Pepperell's Nashua Road Well #1 extends into the western portion of the Property. This area of the Property should be characterized as RCGW-1. It is not clear from the plans provided whether fill is proposed in the Zone II.
  - o **Response 6:** The project's Civil Engineer (Landtech) is currently working to update and finalize construction drawings and will include the limits of Zone II area that extends into the Property. The Zone II Area will be characterized as RCGW1 and identified in the SMP and drawings as such. If filling is required, area will be characterized as RCGW1. As appropriate, the SMP will be updated and resubmitted to MassDEP under a separate cover.
- **MassDEP Comment 7:** Page 5 states that a groundwater monitoring plan will be submitted to MassDEP within 90 days of the effective date of the ACO. The Proponents should include a Groundwater Monitoring Plan in their Soil Management Plan, for approval, prior to issuing an ACO, if one is issued. The Plan should include at least one monitoring well couplet (shallow and deep) within the Zone II area of the Property. The analyses should also include pH and amenable cyanide.
  - o **Response 7:** Agreed. The SMP be will be revised to include Groundwater Monitoring Plan and will include pH and amenable cyanide. The SMP will be updated and resubmitted to MassDEP under a separate cover.
- **MassDEP Comment 8:** Page 5 states that the Project shall conduct an appropriate risk assessment and mitigation, if necessary, when any adverse impacts have been identified as a result of project activities. The Proponents are advised that an ACO, if one is issued, would not exempt MCGI from the MCP notification requirements for any sudden release of oil or hazardous materials above a reportable quantity, or any release indicated by the presence of oil or hazardous materials in groundwater at concentrations exceeding the applicable reportable concentrations. Such conditions will require notification to MassDEP in accordance with the MCP.
  - o **Response 8:** Agreed. MCGI has no issue with this comment and understands the conditions of an ACO. As such. MCGI takes this comment under advisement and consideration. As appropriate, the SMP will be updated and resubmitted to MassDEP to address this comment under a separate cover.
- **MassDEP Comment 9:** Page 6 provides a list of Parties Involved. The Proponents should include the contact information, including phone numbers, for the Emergency Contact person who must be available at all times during the duration of the project in case of an emergency.

- o **Response 9:** Mr. David Burton is a Resident of Pepperell and will be identified as the Emergency Contact. Under a separate cover, the SMP will be updated and resubmitted to MassDEP to address this comment.
- **MassDEP Comment 10:** Page 7 states that a review of the drilling permits at the Board of Health shows the fill is not within 500 feet of a private water supply well. The Proponents should provide additional documentation to confirm that the airport to the east of the Property is connected to the public water supply.
  - o **Response 10:** A representative from TERRA Environmental has reviewed available records include Town records and has not found private wells within 500-ft of the fill area. As discussed in previous **Responses**, drawings will be updated to identify residential properties within 500-ft. Also, a representative from MCGI will contact property owners within 500-ft of the fill area to confirm the non-existence and/or existence of private wells. This information will be provided in the updated SMP. Please note that MCGI owns the abutting property with the exception of the Airport. The Airport does not have a private well onsite and receives its water from the Town of Pepperell. Under a separate cover, the SMP will be updated and resubmitted to MassDEP to address this comment.
- **MassDEP Comment 11:** Page 7 states that the reclamation area is not within a Current Drinking Water Source Area. It is not clear from the Plans provided whether fill is proposed in the Zone II area of the Property.
  - o **Response 11:** As described in **Response 6**, the project's Civil Engineer (Landtech) is currently working to update and finalize construction drawings and will include the limits of Zone II area that extends into the Property. The Zone II Area will be characterized as RCGW1 and identified in the SMP and drawings. As appropriate, the SMP will be updated and resubmitted to MassDEP under a separate cover.
- **MassDEP Comment 12:** Page 8 states that all batches of soil, represented by a single composite analysis, must meet Soil Acceptance Criteria. The Proponents should clarify this statement.
  - o **Response 12:** When multiple composite samples are submitted from a donor project for reuse as reclamation soil, we will require that each single composite analysis submitted for acceptance must meet our acceptance criteria. In general terms, we will not accept averaging of composite sample analysis. The SMP will be updated and resubmitted to MassDEP under a separate cover.
- **MassDEP Comment 13:** Page 8 states that visual inspection of the soil is to be performed at the time of soil borings, test pits, stockpile sampling, at time of excavation and/or upon arrival at the project site. The Proponents should delete the word "or" from and/or in this statement and identify the parties responsible for conducting these visual inspections. The Generator should conduct visual inspection at the site of generation and an MCGI representative will observe off loading and perform visual inspections of soil at the Property.
  - o **Response 13:** Agreed. SMP be will be revised to reflect MassDEP's comment.

- **MassDEP Comment 14:** Page 9 states that soil mixed with bentonite clay or other slurry material will be accepted on a case by case basis. The Proponents should delete this statement. MassDEP will require that soil/slurry mixtures must contain less than 1% by volume of bentonite or other slurry material to be accepted. The pH of the soil/slurry mix must be tested after the mixing occurs and at a rate of one test per 50 cubic yards.
  - **Response 14:** Agreed. As discussed in **Response #1**, the SMP be will be revised to reflect MassDEP's comment.
  
- **MassDEP Comment 15:** Page 9 states that soil will contain no free liquid. The Proponents should include the following language: "Soil shall not contain any free draining liquids. Soils may contain naturally deposited silts and clay with minor amounts of naturally occurring organic material and moisture levels that would be expected to evaporate quickly while it is being worked and spread rather than move through the soil to groundwater. Dredge spoils, slurry, and any material delivered in a tanker or vacuum truck are prohibited."
  - **Response 15:** Agreed. The SMP be will be revised to reflect MassDEP's comment.
  
- **MassDEP Comment 16:** Page 9 states that the Property is not located within a mapped Priority Habitat for Rare Species or an Estimated Habitat for Rare Species. The Proponents should revise this statement. According to Oxbow Associates, a portion of the site adjacent to the Nashua River, is mapped within Priority and Estimated Habitat of Rare Species.
  - **Response 16:** See **Reponses 2 and 3** referenced in the Memorandum. The SMP be will be revised to reflect MassDEP's comment
  
- **MassDEP Comment 17:** Page 10 states that "Testing is required on soil proposed for acceptance as fill material for sources such as ... ". The Proponents should revise this to state that "Testing is required on all soil proposed for acceptance as fill material from all sources."
  - **Response 17:** Agreed. The SMP be will be revised to reflect language recommended by MassDEP's comment.
  
- **MassDEP Comment 18:** Pages 10 and 11 provides a list of analyses required on soil. The Proponents should delete Net Acid Generation from this list. MassDEP will require that the Project may not accept blasted or excavated ledge or bedrock. Similarly, the Proponents should delete Source/Origin Category 6, Rock, from the sampling frequency matrix on Page 12.
  - **Response 18:** At the time of this submittal, MassDEP allowed acceptance of blast rock requiring "Net Acid Generation." If MassDEP will not allow acceptance of this material under the ACO, the SMP be will be revised to reflect language recommended by MassDEP's comment.
  
- **MassDEP Comment 19:** Page 11 states that not testing is required for Category 1, Naturally Deposited soils, under certain conditions. The Proponents should revise the sampling frequency for Category 1 to one test profile per 1,000 cubic yards. All soils accepted for use as fill must be tested. Also, the term Test Profile is not defined. I presume it means the full suite of testing listed on Page 10, but this should be explained.
  - **Response 19:** Agreed. The SMP be will be revised to reflect sampling frequency for Naturally deposited soils. A test profile does mean "full suite of testing." The SMP will

be revised to reflect this comment.

- **MassDEP Comment 20:** Pages 13 and 14 contains a Table of proposed Acceptance Criteria that were derived from MassDEP Similar Soils Provision Guidance WSC#-13-500. The values listed as Acceptance Criteria are not consistent with the Limiting Soil Concentration values in the policy. The Proponents should revise the table for RCS-2 compatible soils and provide a separate table of Acceptance Criteria for RCS-1 compatible soils. The tables should include Acceptance Criteria for each of the compounds in the EPA Method 8260, 8270, pesticide and herbicide target compound lists. Also, The Proponents should include Acceptance Criteria for amenable cyanide, EPH, asbestos fibers, and PID screening.
  - **Response 20:** Agreed. The SMP be will be revised to reflect MassDEP's recommendations provided in **Comment 20**.
- **MassDEP Comment 21:** Page 15 states that soil submittal packages must be submitted for review and approval by representatives of Nashua Road. Nashua Road is not a defined entity. The Proponents should clarify this statement.
  - **Response 21** "Nashua Road" will be replaced with "TERRA Environmental." The SMP be will be revised and resubmitted to MassDEP under a separate cover.
- **MassDEP Comment 22:** Page 15 states that "The Reclamation Soil Sources/Origin is required to provide an LSP Opinion and is required for all shipments that originate from RCS-1 or RCS-2 locations, acknowledging that Pepperell Reclamation Project's Acceptance Criteria are not exceeded, and the LSP Opinion shall demonstrate, pursuant to the provisions of the MCP, that the proposed soils is exempt from the notification requirements of the MCP and is not otherwise considered "Remediation Waste."
  - The term "Reclamation Soil Sources/Origin" is not defined. If this is a form to be used, the Proponents should include it in an appendix.
  - An LSP can only render an LSP Opinion for Waste Site Cleanup Activities. The Proponents should consider revising to Qualified Environmental Professional.
  - The statement implies that soils from out of state sources will be treated differently from soils that originate from in-state. The Proponents should delete the phrase "that originate from RCS-1 or RCS-2 locations". A QEP opinion should be provided for all locations, including those out of state.
  - The Proponents should clarify or delete the phrase "and the LSP Opinion shall demonstrate, pursuant to the provisions of the MCP, that the proposed soils is exempt from the notification requirements of the MCP and is not otherwise considered Remediation Waste." The Proponents should be advised that the Acceptance Criteria apply to all soils, including "exempt" soils, and out of state soils that are not subject to MCP regulations.
  - **Response 22:** Agreed, we have no issue with this comment. As described in Comment 22, the SMP be will be revised and resubmitted to MassDEP under a separate cover to reflect Comment 22.
- **MassDEP Comment 23:** Page 15 states that a complete submittal package must contain

the following:... Appropriate shipping papers signed by an LSP/Qualified Environmental Professional and the Generator. The Proponents should specify the use of either MCP Bills of Lading or Material Shipping Records for shipping documentation.

- o **Response 23:** Agreed. The SMP will be updated to specify the use of “either MCP Bills of Lading or Material Shipping Records for shipping documentation.” The SMP be will be revised and resubmitted to MassDEP under a separate cover.
  
- **MassDEP Comment 24** Page 16 states that the Project will utilize several best management practices ... including any BMPs that are proposed in the SWPPP and required in the Town of Pepperell Order of Conditions to manage stormwater runoff at the Site. The Proponents should provide a copy of the Order of Conditions issued by the Town. The Proponents should provide a stormwater management plan for review, to include during- and post-construction stormwater management BMPs.
  - o **Response 24:** Based on work performed by Oxbow Associates, an Order of Conditions will not be required. Please refer to **Responses 2, 3, and 4**. As appropriate, the SMP be will be revised and resubmitted to MassDEP under a separate cover.
  
- **MassDEP Comment 25:** Page 16 states that a Health and Safety Plan will be required by the operator. The term "operator" is not defined. This section also has a reference to Appendix B, which was not provided.
  - o **Response 25:** A construction health and safety plan will be prepared construction (i.e. reclamation activities). The Operator will be MCGI and/or TERRA. Reference to Appendix B will be deleted. The SMP be will be revised and resubmitted to MassDEP under a separate cover.
  
- **MassDEP Comment 26:** Page 18 states that a third-party consultant will collect a soil sample during off-loading for QA/QC testing and that test parameters will be as required by MassDEP and identified in the Project ACO. The Proponents should revise to state that the soil will be analyzed for all of the test profile parameters listed on Page 10 of the SMP.
  - o **Response 26:** Agreed. The SMP be will be revised to state that the “soil will be analyzed for all of the test profile parameters listed on Page 10.” The revised SMP will be submitted to MassDEP under a separate cover.
  
- **MassDEP Comment 27:** Page 18 states that the inspector shall "Collect a grab sample of any area or load that appears to be contaminated ... If no area or load appears to be contaminated, collect a composite soil sample from a minimum of one load of soil being delivered or that had been delivered to the property since the previous inspection ... ". The Proponents should revise this section for consistency with other similar projects. QA/QC samples should be collected from random loads as they arrive, not from material that has already been accepted and placed as fill. If no loads arrive during the inspection, the sampling may be omitted for that month, or postponed to another date that month. A minimum of two samples shall be collected per calendar quarter during the active operation of the Project.
  - o **Response 27:** Agreed. The SMP will be revised to reflect MassDEP Comment #27. The revised SMP will be submitted to MassDEP under a separate cover.

- **MassDEP Comment 28:** Page 18 states that if the Generator fails to remove unacceptable soil within 7 days of notification, then Pepperell Reclamation Project Team will remove the soil for proper off-site management or disposal. Page 18 also states that other sampling may be performed by Reclamation Project. The Proponents should replace the terms "Pepperell Reclamation Team" and "Reclamation Project" with "MCGI".
  - **Response 28:** Agreed. The SMP will be revised to reflect MassDEP Comment 28. The revised SMP will be submitted to MassDEP under a separate cover.
  
- **MassDEP Comment 29:** Page 18 contains a reference to the Sewell Street Reclamation Project.
  - **Response 29:** Reference will be "DELETED." The revised SMP will be submitted to MassDEP under a separate cover.
  
- **MassDEP Comment 30:** Page 19 discusses Monthly Report submittals to MassDEP. This section should be revised to be exactly the same as what is provided in the ACO, if one is issued. Alternatively, the section may be omitted from the SMP. It is sufficient to state that MCGI shall submit Monthly Reports to MassDEP in compliance with the requirements of the ACO.
  - **Response 30:** Agreed. The SMP will be revised to reflect MassDEP Comment #30. The revised SMP will be submitted to MassDEP under a separate cover.
  
- **MassDEP Comment 31:** Page 19 also discusses the requirements for the Independent Third-Party inspection reports. The Proponents should be advised that these Third-Party inspection reports must be submitted separately, and they must be submitted to MassDEP directly by the inspector, not MCGI.
  - **Response 31:** Agreed. The SMP will be revised to reflect MassDEP Comment #31. The revised SMP will be submitted to MassDEP under a separate cover.

**MassDEP Additional Comments:**

- **MassDEP Comment – Additional Comments:** The Proponents should provide documentation of compliance with COMM-15-01 requirement to demonstrate that the appropriate local officials are aware of the project and have been afforded the opportunity for meaningful input.
- **Response – Meaningful input:**
  - As identified in the SMP, MCGI reached out numerous times to the appropriate local officials to discuss the project. The following timeline was provided in SMP submitted June 28, 2018
    - **December 5, 2017:** Representatives from MCGI contacted and met with Town representatives; No response from Town Officials
    - **February 11, 2018:** Mr. David Burton, the President of MCGI, met with and distributed a letter describing the Reclamation Project to various Town officials. No response from Town Officials
    - **June 28, 2018:** MCGI submits this Soil Management Plan to Town of Pepperell and requests meeting with the Town of Pepperell's Town Administrator and Town Planner as well as the Selectmen at the earliest mutually-convenient date to discuss the Reclamation Project and to answer any questions or respond to any concerns

regarding the Reclamation Project. As of the date of this Soil Management Plan, representatives from the Town of Pepperell have not directly contacted representatives from MCGI, and/or Mr. David Burton to discuss the project.

Due to the timing of the SMP submittal to MassDEP and the Town, the time line outlined below occurred after June 28, 2018;

- **July 5, 2018:** Mr. Moak via email, acting Town Administrator requests an electronic version of Soil Management Plan.
  - **July 9, 2018:** Mr. Moak, acting Town Administrator returns email stating that he will contact TERRA after July 16, 2018.
  - **July 17, 2018:** Mr. Moak writes, "You have requested a meeting with staff and Board of Selectmen, at last night's Board of Selectmen's Meeting, members requested that we plan a meeting with the landowner and his consultant group. I would like to begin that process. We have engaged the law firm of Mirick O'Connell to assist the Town with this project. We confirmed the selection last evening, as soon as I have had an opportunity to communicate with David McCay, the lead attorney, I will proceed in scheduling this meeting. Independent of the Selectman's meeting I will also attempt to schedule a staff meeting with landowner and consultants. Yesterday we held our first staff meeting with DEP regarding this project."
  - **July 24, 2018 (9:38am):** Mr. Moak writes, "The Board of Selectmen for the Town of Pepperell have asked me to invite you and your associates to present a public presentation of your proposal on August 6, 2018. The meeting is scheduled for the Senior Center to begin at 7:15. You will be the only agenda item for that evening. This will be a public meeting of the Board of Selectmen and there will be a period of time when the public may ask questions. The Board will structure the meeting. There is some ability for media presentation at the Senior Center, if you believe that a more sophisticated media venue is important, we can look to hold meeting at our middle school."
  - **July 24, 2018 (1:45pm):** Mr. Moak writes, "I am sorry for this inconvenience, but after the Board set the schedule last evening, we have learned of a number of conflicts. I am not certain, will get back to you soon, but looks like August 20<sup>th</sup> is a better date."
  - **August 14, 2018:** Town confirms meeting, "Board of Selectmen's meeting which has one agenda item for August 20, 2018, Pepperell Senior Center, 7:15PM. Please indicate how many people will make up your team, I am trying to configure the layout of space for presenters. Will you need any audio-visual assistance? The Senior has projection units, they are not ceiling mounted. As I mentioned earlier, the Board of Selectmen will be running this meeting. Our plan is a presentation from MCGI with questions from the Board and then a time to allow public comment and questions. The presentation will be filmed and broadcast live on our cable station, similar to all Board of Selectmen's meetings.
  - **August 20, 2018:** MCGI Team presents Project to Board of Selectmen and public. Meeting began at 7:15 and ended at about 10:15. MCGI team answered questions from both the BOS and Pepperell Residents.
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- **MassDEP Comment – Additional Comments:** The plans provided in the SMP are conceptual and inadequate for construction or enforcement of an ACO. The Proponents should provide engineered plans to the appropriate scale and stamped by a P.E or R.L.S including:

- o Existing Conditions Plan showing topography with spot elevations, wetland resource areas, NHESP Habitat, Zone II and other sensitive receptors, extent of existing disturbance, the delineation of the RCS-1 and RCS-2 areas, etc.
- o Grading Plans showing proposed final elevations and contours, proposed post-construction stormwater management BMPs (swales, basins, etc.), construction phases, if any, etc. The Plans should include details showing slope stabilization, drainage layer and topsoil or other capping material.
- o Erosion and Sedimentation Control Plan showing proposed stormwater management BMPs during construction including erosion controls and temporary sediment basins.
- **Response to MassDEP - Additional Comments:** As discussed in **Responses 2, 3, and 4**, MCGI's Engineer and Surveyor is in the process of preparing final drawings to address all MassDEP's comments. Final Plans and Drawings will be included in the updated Soil Management Plan (SMP) to be submitted to MassDEP and the Town of Pepperell. MCGI anticipates submitting an updated SMP that address all of MassDEP's comments including and not limited to MassDEP COMM#15-001.

#### **Meaningful input - Update:**

##### **August 20, 2018 Public Meeting :**

- MCGI Team presented Project to Board of Selectmen and public.
- Meeting began at 7:15 and ended at about 10:15.
- MCGI team answered questions from both the BOS and Pepperell Residents for over 2-hours.

**MCGI – Next Steps for meaning input:** The following input was noted by the MCGI Team during the August 20, 2018. Please note that as of September 7, 2018 the Town has not provided written or verbal input. MCGI plans to address the following issues in writing to the Town.

1. *Provide current and final elevations of fill area.*
2. *Verify truck routes and provide map(s) with 2-routes following state roads.*
3. *Address to the extent applicable project noise, dust, and odors (i.e. nuisance concerns) by providing more information.*
4. *Provide a plan for communicating with the public and interested parties during the project.*
5. *What will this project do for Pepperell?*
6. *Provide more details regarding the "donor" soil sites.*

If you should have any questions or require additional information, please do not hesitate to contact Philip Peterson directly.