

## **MASS COMPOSTING GROUP, INC.**

February 7, 2020

Mark Baldi, Deputy Regional Director  
Bureau of Waste Site Cleanup  
Commonwealth of Massachusetts  
Department of Environmental Protection  
Central Regional Office  
8 New Bond Street  
Worcester, MA 01606

**RE: Mass Composting Group, Inc. ("MCGI"); 161 Nashua Road, Pepperell  
Reclamation Project (the "Project")**

Dear Deputy Regional Director Baldi:

As you know, I am a co-owner and represent the interests of MCGI with respect to the above Project. I appreciate the time that you and Regional Director Pigsley took to meet with me and others involved in the Project in December 2019.

We have considered the discussion that occurred with you and Director Pigsley at that meeting. I will emphasize again that MCGI wants to work cooperatively with all involved, including the Town of Pepperell, if at all possible. Since day one of this Project, I have told my team that we must be transparent to third parties on what the Project is and develop the Project in strict compliance with applicable law. To that end and based upon what we discussed during our meeting, I offer the following:

- MCGI believes that it has appropriately responded to the various issues that the Town of Pepperell has raised by providing additional details regarding control/mitigation for dust, traffic, wetlands, and the like as set forth in detail, for example, in MCGI's letter to the Town dated October 25, 2019, which was provided to MassDEP.
- The revised Soil Management Plan ("SMP" or "Plan") for the Project that MCGI submitted to MassDEP in March 2019 is consistent with soil management plans for other reclamation projects for which MassDEP has provided an Administrative Consent Order ("ACO") under MassDEP's Interim Policy on the Re-Use of Soil for Large Reclamation Projects.
- The RCS1 and RCS2 soils proposed for the Project are appropriate for the Project's location and do not exceed regulatory thresholds and are otherwise not regulated by MassDEP at the MCGI reclamation site.
- MCGI will, and has informed MassDEP that it intends to have LSP oversight at the originating source location and the reclamation project in Pepperell, of the

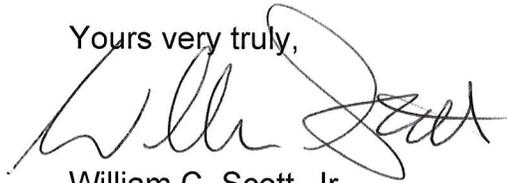
reclamation process consistent with the Plan and other projects for which MassDEP has provided ACOs, including at Saugus and Westford.

- MCGI will, and has informed MassDEP that its LSP will implement a Groundwater Monitoring Program consistent with the Plan and other projects for which MassDEP has provided ACOs.
- Additionally, MCGI's LSP will conduct sampling of soils at intervals consistent with the Plan and consistent with other reclamation projects that have ACOs.

MCGI understands, based on our discussions, that implementing the Plan at the Project site as presented, including RCS1 and RCS2 materials where demarcated on the plans, is not regulated by MassDEP, falling below regulatory standards and thresholds and therefore can be implemented without formal MassDEP oversight pursuant to an ACO. We would welcome formal MassDEP oversight and are ready to enter into an ACO, however we understand that the Town continues to object.

Please contact me with any questions and thank you for your time and attention.

Yours very truly,

A handwritten signature in black ink, appearing to read 'William C. Scott, Jr.', written in a cursive style.

William C. Scott, Jr.

cc: Mary Jude Pigsley, Regional Director