



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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June 21, 2022

Mr. Steven Ellis, Town Administrator
Town of Montague
1 Avenue A
Turners Falls, MA 01376

Re: Town of Montague
Proposed Residuals/Biosolids
Composting Facility

Dear Mr. Ellis,

This letter is a follow-up to the meeting held on June 3, 2022, between representatives of the Town of Montague and the Massachusetts Department of Environmental Protection's (MassDEP) Western Regional Office. It is intended to offer guidance and pathways that were discussed for the proposed development of a residuals/biosolids composting facility in the Town of Montague.

Please note that this letter is not intended to stipulate specific permitting requirements but rather to provide information as to potentially applicable permits/approvals, as well as the protocols and criteria MassDEP utilizes during the review process. This letter includes a brief summary of the project as it was presented to MassDEP and information specific to concerns regarding Per- and Polyfluoroalkyl Substances (PFAS). Any final proposed plan and/or final design would have to be reviewed by the Department prior to issuance of a final permitting pathway for the project.

MassDEP representatives from the Springfield Regional Office included staff from Administrative Services, Bureau of Air and Waste, and the Wastewater Program. The Town of Montague (Montague) representatives included the Town Administrator, Water Pollution Control Facility Superintendent, the Executive Director of the Franklin County Solid Waste Management District and Montague's consultant.

Project Summary

Montague reported that transportation and disposal costs for biosolids have become increasingly prohibitive which is why they are seeking alternative options. The Montague Water Pollution

This information is available in alternate format. Contact Glynis Bugg at 617-348-4040.

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Control Facility (WPCF) generates approximately 4 tons per week and Montague has expressed a preference for beneficial reuse of biosolids versus transportation and disposal. Montague is simultaneously exploring options for managing its own biosolids and managing on a regional scale of up to 10 tons per week through a biosolids composting facility to be constructed on Town property. The project considers both a smaller facility solely for Montague and a larger facility including approximately ten additional communities. Consideration is being given to a design that would allow the project to “scale up” from the smaller facility to a larger facility, as Per-and Polyfluoroalkyl Substances (PFAS) regulations develop, and Montague develops potential markets.

A preliminary study conducted by Stantec reviewed two sites for potential composting operations: a site within the town WPCF parcel and the “Sandy Lane” Solid Waste facility location site. The study determined that the Town WPCF site will not support a composting facility; the Town is assessing a portion of the Sandy Lane property for use as a biosolids handling facility.

Site Assignment

Construction of any wastewater residual processing facility requires a Site Assignment through either Water Pollution Control statute or the Solid Waste Regulations. Montague has previously operated a pilot scale biosolids composting operation within the WPCF site assigned parcel, however, that location was determined to be inadequate size to accommodate a full scale operation and the upscaled proposal.

MassDEP has researched the Solid Waste regulated Site Assignment of the preferred location at the “*Montague Landfills & Transfer Station*” located on Sandy Lane that includes a closed solid waste facility, transfer station and has a General Permit for Composting. MassDEP records indicate the Montague Board of Health (BOH) issued a solid waste Site Assignment for an area consisting of multiple parcels totaling 163.66 acres on March 14, 1988. The site assignment states that it covers the area depicted on a plan titled *Sketch of Town Property, Turnpike Road Municipal Sanitary Landfill, Montague, Massachusetts*, dated November 1987 (attached). It appears that the proposed biosolids composting operation could be accommodated within the originally site-assigned area depicted on that plan.

In 1996, the Town developed a proposal for a biosolids processing to be located on the existing site-assigned land off of Sandy Lane; that facility was not constructed. The BOH issued an amended site assignment on July 9, 1996, to accommodate this proposal. This amendment changed the existing site assignment from a landfill-specific site assignment to a “*Solid Waste Management Facility which could possibly include a Sludge Management Facility.*” As a result, there may be no additional site assignment modification to accommodate the current proposal. MassDEP does advise that Montague review the records of the BOH to ensure that the Site Assignment has not been further modified or rescinded after 1996.

Given the size and nature of the facility as presented by Montague, the proposed biosolids handling facility would be classified as a Small Handling Facility (receiving less than 50 tons per day). As such, Montague would require the following MassDEP Solid Waste Permits: an Authorization to

Construct permit (SW 19, Small Handling Facility), and an Authorization to Operate (SW 20, Small Handling Facility).

Wetlands

The preferred location for the processing facility is located on Sandy Lane. At this time, it is anticipated that wetland resource areas on the parcel will not to be impacted. Prior to undertaking any activity at the proposed site, Montague should determine whether or not permitting is required under the Wetlands Protection Act; if a permit is required, an application should be filed with the Montague Conservation Commission.

If the WPCF site is reconsidered as the preferred location, further assessment of the proposed activities would be required. As you are aware, nearly the entire WPCF parcel is located within regulated resource area(s), specifically Riverfront Area.

Per-and Polyfluoroalkyl Substances (PFAS)

MassDEP established its PFAS public drinking water standard and has also established soil reportable quantities and soil cleanup standards based on the sum of the concentrations of six PFAS contaminants- perfluorooctane sulfonic acid (PFOS); perfluorooctanoic acid (PFOA); perfluorohexane sulfonic acid (PFHxS); perfluorononanoic acid (PFNA); perfluoroheptanoic acid (PFHpA); and perfluorodecanoic acid (PFDA). MassDEP abbreviates this set of six PFAS as “PFAS6”. The future regulation of PFAS levels in wastewater, wastewater residuals, biosolids and compost is not yet finalized. MassDEP cannot speculate as to not-yet developed regulations or potential regulatory limits for PFAS. As discussed, future PFAS limits or uncertainty over future PFAS limits may affect the ability of Montague to market the compost material.

Montague WPCF staff indicated that periodic testing of residuals for PFAS concentrations has been ongoing. MassDEP recommends that testing continue, and that Montague consider periodically testing incoming loads from outside sources to determine if those loads will increase the concentrations of PFAS in the biosolids end product.

Information about PFAS at waste sites, including final PFAS-related revisions to the Massachusetts Contingency Plan regulations, information on interpreting PFAS laboratory reports, fact sheets and technical support documents can be found here – <https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas#pfas-and-waste-sites->

Regarding the testing of residuals for PFAS, our discussion included ensuring that Montague is using a MassDEP approved laboratory for analysis of residuals and that the reportable quantities of contaminants are at the appropriate level to detect relevant PFAS concentrations. Information on the subject of PFAS testing can be found at this link: <https://www.mass.gov/info-details/testing-of-pfas-in-wastewater-and-residuals>

The 192nd General Court of the Commonwealth of Massachusetts has established the PFAS Interagency Task Force. Information that may be helpful on hearings, presentations and reports can be downloaded at - <https://malegislature.gov/Commissions/Detail/556/Documents>.

Environmental Justice

The Massachusetts Executive Office of Energy and Environmental Affairs and MassDEP have updated the Environmental Justice (EJ) policy to include a Public Involvement Plan (PIP) component for MassDEP Permits and Approvals that currently include a Public Comment period.

The PIP process is triggered if the project site is located within or within one mile of, a designated EJ Population and any permits required from MassDEP include a Public Comment period. A review of the mapped EJ populations in Montague indicated Sandy Lane has EJ populations within one mile of the proposed site.

This process would be applicable if a Site Assignment modification is required. Should a PIP process be required, MassDEP will work with Montague to facilitate the outreach. The interactive EJ mapping tool is available at the following website: [Environmental Justice Populations in Massachusetts \(arcgis.com\)](#)

Massachusetts Contingency Plan (MCP)

Releases of oil and/or hazardous materials are governed by the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E, and the Massachusetts Contingency Plan (MCP 310 CMR 40.0000). If contamination is encountered during construction activities or if a release occurs, Montague should retain a Licensed Site Professional (LSP). The MCP details procedures to follow for the parties conducting work.

For program specific questions, please contact the following:

- Wastewater, Chief Matt Sokop, 413 755-2218
- Solid Waste, Chief Dan Hall, 413 755-2212
- Environmental Justice Public Involvement Plan – Catherine V. Skiba 413-335-7514, Catherine.Skiba@mass.gov

Please feel free to contact me at (413) 755-2267 with general questions regarding the project.

Sincerely,

Kathleen Fournier

Kathleen Fournier, MPH
Acting WERO Service Center Manager

ec: Eva Tor, MassDEP DRD, Bureau of Air and Waste
Dan Hall, MassDEP, Section Chief, Solid Waste
WERO: BAS file

Attachments: Site Assignment dated 3-14-1988
Site Assignment dated 7-9-1996
Sketch of Town Property plan Nov 1987
MassDEP letter dated 1-9-2003 re: Site Assignment