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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SINGLE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Bourne Integrated Solid Waste Management Facility
PROJECT MUNICIPALITY	: Bourne
PROJECT WATERSHED	: Cape Cod
EOEA NUMBER	: 11333
PROJECT PROPONENT	: Town of Bourne
DATE NOTICED IN MONITOR	: November 23, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Supplemental Environmental Impact Report (Single Supplemental EIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Project Description

As described in the Single Supplemental EIR, the project consists of the phased expansion (Phases 7, 8 and 9) of the Bourne Integrated Solid Waste Management Facility (ISWMF) project. Specifically, the Town of Bourne is proposing a vertical and horizontal landfill expansion and the relocation of the solid waste handling facility and other offices and facilities on the property. The three phase 25.0-acre expansion will provide a total of 5,175,000 cubic yards (cy) of disposal capacity which will extend the life of the landfill through 2040.

The horizontal expansion of the landfill (Phase 7 and 8) will require the development of new lined landfill cells in an area located south of Phase 6. These new cells will incorporate leachate collection and landfill gas management infrastructure. Phases 7 and 8 will provide approximately 3,920,000 cy of disposal capacity. The horizontal expansion will be located within a 25-acre parcel that is currently site assigned for solid waste handling and contains a residential recycling area, transfer

station, office building, and other appurtenant structures. The development of Phases 7 and 8 will require the relocation of the transfer station and other structures to an adjacent 12-acre parcel which was acquired by the Town in 2016 and abuts the residential recycling center at the southern boundary of the site. The vertical expansion (Phase 9) is proposed over uncapped areas of the landfill and areas that have been capped with a final cover system. Phase 9 will increase the maximum height of the landfill by 40 feet (from 185 ft to 225 ft) and will provide approximately 1,255,000 cy of disposal capacity which could extend the life of the landfill up to four and a half years.

The Certificate on the Final Environmental Impact Report (FEIR), issued November 29, 1999, acknowledged that certain aspects of the landfill project, including future phases, were conceptual and required that the Town submit Notice of Project Changes (NPCs) to the MEPA Office to address development of subsequent phases. The Town submitted an Expanded NPC in February 2020 that provided an updated site development plan for the landfill and described the development of Phase 7, Phase 8 and Phase 9 of the landfill expansion. The Town was allowed to submit a Single Supplemental EIR in lieu of the usual two-stage Draft and Final EIR process.

Procedural History

The full procedural history for this project was reviewed in the Certificate on the Expanded NPC. Review of the Bourne ISWMF project was initiated with the submission of an Environmental Notification Form (ENF) in 1997. Several Notices of Project Change (NPC) were filed thereafter, including the Expanded NPC on this project change filed in February 2020. All prior phases through Phase 6 were previously reviewed, and the most recent Certificate on Phase 6 was issued on June 26, 2018.

Project Site

The Bourne ISWMF, located at 201 MacArthur Boulevard (Route 28), is comprised of a 74-acre site-assigned parcel which contains the landfill operations and facilities. In 2001, a 25-acre parcel immediately abutting the landfill to the south was purchased and has been used for recycling and transfer operations. The landfill contains lined and unlined waste disposal areas. Phases 1A, 1B, 1C, and 1D are unlined cells that comprise the oldest portion of the landfill. Phases 1A, 1B, and 1C are closed and capped. Phase 1D was part of a pilot landfill reclamation project with the Massachusetts Department of Environmental Protection (MassDEP) that removed the solid waste in this area in order to create additional landfill space. Phases 2 and Phase 3 are both lined and are closed and capped with leachate collection systems. Phase 4, an active landfill cell, is located in the area previously occupied by Phase 1D. Phase 5 consists of a vertical expansion proposed over Phases 1A, 1B, and 1C. MassDEP issued an Authorization to Construct (ATC) and ATO Permit in 2019 for Phase 6 which is currently under construction.

Permits and Jurisdiction

The development of Phases 7, 8 and 9 is undergoing MEPA review and requires an NPC because it consists of a material change to the project prior to the taking of all Agency Actions. The project change exceeds the mandatory EIR threshold at 301 CMR 11.03 (1)(a)(2) because it will result in the creation of ten or more acres of impervious area. The project change also exceeds the Solid Waste ENF

threshold at 301 CMR 11.03(9)(b)(1) because it will result in new capacity or expansion in capacity for combustion or disposal of any quantity of solid waste, or storage, treatment or processing of 50 or more tpd of solid waste. Because it requires an EIR, the project change is subject to review in accordance with the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol ("GHG Policy").

The proposed landfill expansion will require the following Permits from MassDEP: Site Suitability Report for a Major Modification of an Existing Site Assignment (BWP SW 38), Authorization to Construct (ATC) a Large Landfill Expansion (BWP SW 26), and Authorization to Operate (ATO) (BWP SW 10). Relocation of the transfer station to the 12-acre parcel will require the following Permits from MassDEP: Site Suitability Report for a New Site Assignment (BWP SW 01), ATC a Large Handling Facility (BWP SW 05), and ATO a Large Handling Facility (BWP SW 06). The project will likely require a Conservation Management Permit (CMP) from the Division of Fisheries and Wildlife's (DFW) Natural Heritage and Endangered Species Program (NHESP).

The project will require a Development of Regional Impact (DRI) Modification from the Cape Cod Commission (CCC), Site Assignment Approval from the Bourne Board of Health, and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the U.S. Environmental protection Agency (EPA).

Because the project is not seeking Financial Assistance from the Commonwealth, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required, or potentially required, State Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations. The subject matter of the Site Assignment regulations is sufficiently broad to confer the equivalent of broad scope jurisdiction over the potential environmental impacts of the project. Therefore, MEPA jurisdiction is broad in scope and extends to all aspects of a project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations.

Environmental Impacts and Mitigation

Potential environmental impacts of the project change will include alteration of 38 acres of land (112 total acres) and creation of 16.23 acres of impervious area. Measures to avoid, minimize, and mitigate project impacts include: construction period Best Management Practices (BMPs), permanent protection of rare species habitat, dust control measures, erosion and sedimentation controls, leachate management, and measures to maximize LFG (landfill gas) collection efficiency.

Review of Single Supplemental EIR

The Single Supplemental EIR was generally responsive to the Scope provided in the Certificate on the Expanded NPC. It described the project, identified existing conditions, and described potential environmental impacts and mitigation measures. It provided a brief description of applicable statutory and regulatory standards and requirements, and described how the project will meet those standards. The Single Supplemental EIR provided a list of required local, state, and federal permits and provided an update on the status of each of these actions. It also contained a response to comments received on the Expanded NPC and draft section 61 findings.

The primary emphasis of the Single Supplemental EIR was to demonstrate that the project's

design and operational measures will comply with solid waste regulations and applicable policies and provide sufficient information for MassDEP to use in making its permitting decisions and associated Section 61 Findings. Comments from MassDEP indicate that the Single Supplemental EIR has provided information to support subsequent permitting where compliance with solid waste regulations and applicable policies will be determined. In addition, MassDEP's comments indicate that the Draft Section 61 Findings are in general compliance with solid waste compliance requirements.

The Single Supplemental EIR includes an update on the Cape Cod Commission (CCC) review process and a discussion of the project's compliance with the pertinent goals and objectives from the Cape Cod Regional Policy Plan.

I have received a comment from the Conservation Law Foundation (CLF) on behalf of Beyond Plastics, Clean Water Action, Community Action Works, the Global Alliance for Incinerator Alternatives, Massachusetts Rivers Alliance, MASSPIRG, Saugus Action Volunteers for the Environment, the Saugus River Watershed Council, Sierra Club, and Sustainable Practices. The comment letter is in opposition to the Town's Phase 7, 8, and 9 Integrated Solid Waste Management Facility expansion as proposed in the Single Supplemental EIR. CLF's comment indicates that the expansion would be a threat to public health and the environment and would continue to undermine the need to responsibly manage waste through source reduction, recycling, and composting.

CLF's comment letter also states that meaningful opportunities for public review of the expansion's potential environmental impacts have not been provided, because it is not possible for the public to access the majority of the historical project documents. As noted above, however, the FEIR Certificate issued in 1999 acknowledged that certain aspects of the landfill project, including future phases, were conceptual and required that the Town submit future NPC filings to disclose the impacts associated with those components. The Expanded NPC filed in February 2020 therefore was the operative document that contained all relevant details (*not* available in historic project filings) related to the phases at issue here, and members of the public have had full access to information and materials associated with this NPC filing. I am also aware that this Office responded to a public records request filed by CLF, and provided the historic files that were sought.

I note that the project will require extensive permitting after the conclusion of MEPA review, and such permitting procedures will include opportunities for public review. The proposed expansion will require the following solid waste permits:

a. For the proposed landfill expansion:
- Site Suitability Report for a Major Modification of an Existing Site Assignment (BWP SW 38).
- Authorization to Construct a Large Landfill Expansion (BMP SW 26), and
- Authorization to Operate (BWP SW 10).

b. For the proposed solid waste transfer station:
- Site Suitability Report for a New Site Assignment (BWP SW 01).
- Authorization to Construct a Large Handling Facility (BWP SW 05); and
- Authorization to Operate a Large Handling Facility (BWP SW 06).

Prior the submission of a BWP SW 38 or BWP SW 01 application, MassDEP requires a preapplication meeting to discuss comments received from the public on the Supplemental Single EIR

and to ensure the facility design and operational measures will comply with solid waste regulations and applicable policies with an emphasis on odor, noise, and traffic mitigation. In addition, the following permit applications have public comment periods or public hearing requirements:

a. BWP SW 01 applications: There is a 21-day public comment period.
b. BWP SW 38 applications: There is a 21-day public comment period.
c. Board of Health Site Assignment Decisions: The Board of Health must hold a public hearing in accordance with 310 CMR 16.20.
d. BWP SW 05 applications: There is a minimum 30-day public comment period.
e. BWP SW 26 applications: There is a minimum 30-day public comment period.
f. BWP SW 06 or BWP SW 10 applications: Public comments are not required prior to issuing a decision, but MassDEP comments indicate MassDEP may issue provisional approval with a deferred effective date to allow for 21-day public notice/comment period.

MEPA review is not a permitting process, nor does it serve as an appeal for local decisions. It does not pass judgment on whether a project is or is not beneficial, or whether a project can or should receive a particular permit. Rather, the MEPA process requires public disclosure of a project's environmental impacts as well as the measures that the proponent will undertake to avoid, minimize and mitigate these impacts. MEPA review occurs before public agencies act to issue permits and approvals for a proposed project to ensure that those agencies are fully cognizant of the environmental consequences of their actions. I have examined the record before me, including but not limited to the Scope issued on the Expanded NPC; the Supplemental Single EIR filed in response; and the numerous comments entered into the record. Given the long history of review of this project as detailed in the Certificate on the Expanded NPC, and the comprehensive information provided in response to the Scope and additional prefiling consultations with Agencies, I do not find that further review is warranted on this project change.

Solid Waste

The project will be regulated under MassDEP's Site Assignment Regulations for Solid Waste Facilities and Solid Waste Regulations. The Town will be required to modify its Site Assignment with the Board of Health prior to development of Phases 7, 8 or 9. The Single Supplemental EIR included a narrative that addressed the project's consistency with the applicable regulatory approval criteria.

Leachate and Landfill Gas Collection

As required by the Scope, the Single Supplemental EIR provided information on the existing monitoring wells and leachate and landfill gas collection systems. It also provided plans and described how leachate and landfill gas will be collected and managed within Phase 7-9. The existing landfill operations include leachate collection and storage facilities, landfill gas collection and treatment systems and an environmental monitoring system that is sampled and evaluated for impacts to groundwater and soil gas conditions in the vicinity of the landfill. These systems will be expanded and maintained for the proposed expansions to the facilities. The leachate collection and storage systems include double composite liner system with primary and secondary leachate collection and monitoring capacity. The double composite liner system consists of 12 inches of low permeable soil, upon which multiple layers of geosynthetic liner materials are installed. MassDEP comments indicate that the double composite

liner system is consistent with systems used for hazardous waste sites.[1] As described in the Single Supplemental Certificate, the layers include primary and secondary geosynthetic clay liners (GCL) and geomembranes, with a leak detection/drainage layer material that drains to a secondary sump and allows for the measurement of leachate that might leak through the primary liner system. On top of the primary geomembrane is a leachate collection system consisting of a network of pipes and 18-inches of drainage sand which allows for the collection and discharge of leachate to the primary leachate sump. There are pumps installed in both the primary and secondary leachate sumps, which pump the collected leachate through a force main to one of two leachate storage tanks. The stored leachate is transferred to tanker trucks and hauled to licensed wastewater treatment plants for treatment and disposal. The leachate collection system will be expanded to Phase 7 by extending the existing Phase 6 leachate collection system. It is anticipated that Phase 8 will be designed and constructed with its own collection system and leachate sump. Phase 9 will be developed by removing any final or intermediate cover systems onto which it will be built, so that leachate will flow vertically into the existing landfill phases and collection system.

Phase 9 will be a vertical expansion of landfilling over existing double composite lined landfill phases. Some of the phase areas have final cap installations that will require the removal of those cap components, including geomembrane barriers. Other areas upon which Phase 9 will be developed (Phase 4, Stage 2 and Phase 5) are currently not capped, because they have just recently stopped operating, having reached their current approved final subgrades. The other portion of the Phase 9 overfill area will be constructed over the future plateau area of the active Phase 6 Landfill, when those approved grades are achieved. The Town plans to develop Phase 9 in stages. The first stage will be to fill the area that is over the Phase 5 Landfill. This will allow the final closure of the northwest corner of the landfill, which includes the currently uncapped Phase 5 sideslopes. The second stage would be to fill over the currently uncapped Phase 4, Stage 2 plateau and the completed Phase 6 plateau. This sequence will allow the postponement of removal of the existing final cap over the remainder of the Phase 9 footprint and will allow for the progressive modification to the existing gas collection system that underlays the Phase 9 Landfill. The completion of the Phase 9 overfill will require sequentially removing stages of the existing final caps of the Phase 2, Phase 2A/3A, Phase 3 and Phase 4, Stage 1 landfills. The sequential cap removal work will be done to minimize the area of open landfill surface at any one time. The Single Sup. EIR contained a Figure 4 in Attachment 3 that shows the anticipated sequential development of the Phase 9 Landfill. There will be areas that remain uncovered for several years before the Phase 9 filling occurs on them. In order to mitigate any impacts from occurring because of this, there will be an intermediate cover layer installed over these areas upon achieving the currently approved subgrades. The intermediate cover will be an application of soil materials meeting the requirements of 310 CMR 19.130(15)(d) Intermediate Cover. Because of the possible long-term exposure of the intermediate cover material until Phase 9 is constructed, the cover soils material will be applied across the subgrade surface, so as to form an intermediate cover that is at least twelve inches (12") thick.

MassDEP comments indicate that the Single Supplemental EIR addressed MassDEP's prior comments regarding the use of a long-term intermediate cover system. MassDEP will evaluate the plan for the long-term intermediate cover at solid waste permitting. MassDEP's decision on the use of long-term intermediate cover and the proposed capping schedule will depend on the waste stream (i.e. mainly ash in the "preferred alternative" or MSW only). If the Proponent decides to accept only MSW, the plan for a long-term intermediate cover system may not feasible according to MassDEP. Comments from

[1] Supplemental information provided by MassDEP on December 29, 2020.

MassDEP make clear that MassDEP may require the Proponent to revise the proposed schedule for capping if there are issues with leachate management, nuisance conditions, or as necessary to ensure compliance with 310 CMR 19.000.

The current landfill facilities include an existing gas collection and treatment system. The system for the management of gas generated within the landfill includes vertical extraction wells and horizontal gas collectors. There is also a network of piping to collect generated landfill gases and convey them to a flare station for treatment. The existing flare station is located to the northeast of the Phase 2 landfill area and prevents the occurrence of odors and the off-site migration of landfill gas. The landfill gas collection system will be expanded by modifying the existing header system, by relocating portions of it to the perimeter sideslopes to prevent them from being buried by the Phase 9 vertical expansion. Existing gas extraction wells located within the proposed footprint of Phase 9 will be modified by converting the wells to having remote wellheads, also along the perimeter sideslopes. The Phase 7 and 8, as well as the Phase 9 overfill waste will have new extraction wells installed and operated in the same manner as the existing extraction wells.

Potential impact from the landfill to the environment has been monitored for several decades by a groundwater and soil gas monitoring program. The monitoring program has consisted of quarterly sampling that began in the 1990s. This program has contributed to the development and approval of a Comprehensive Site Assessment (CSA) for the site. The scope of the current monitoring program was established in MassDEP's approval of the CSA in 2017. According to the Single Supplemental EIR, the facility anticipates that MassDEP approvals for Phases 7 and 8 will include the placement of additional groundwater and gas monitoring wells along their perimeter.

Traffic Assessment

The Single Supplemental EIR included a traffic assessment memorandum (dated July 16. 2020) which indicated that traffic generation has decreased since 2015 when municipal combustor ash, delivered in large trailers, became the primary waste stream. The Single Supplemental EIR also described that if the MSW (municipal solid waste) Alternative were to occur and the facility were to operate at daily capacity, more truck traffic would be needed to deliver such waste to the facility. The Single Supplemental EIR concludes that even if the MSW alternative were adopted, the maximum level of traffic would be the same level that existed as of 2015. However, this is the operational scenario that existed at the facility prior to accepting ash even if the facility returned to receiving MSW waste (which is not the Preferred Alternative). Therefore, the Single EIR concludes that even if MSW alternative were adopted, the maximum traffic would be the same level that existed as of 2015. The Single Supplemental EIR indicated that the project does not otherwise require an increase to the permitted tonnage the site can accept and therefore will not generate new traffic or impact traffic patterns due to an increase in permitted tonnage limits. The traffic assessment memorandum concluded that if the facility runs at daily capacity through its life, the landfill will operate until approximately September 2041 under the Preferred Alternative of accepting ash, while the MSW Alternative will only operate until approximately January 2036. The Single Supplemental EIR also included crash data from the Massachusetts Department of Transportation (MassDOT) from January 1, 2013 to June 4, 2020 for locations near the facility. Analysis of the data confirms that traffic operations of the facility will not constitute a danger to public safety.

Land Use and Water Resources

As required by the Scope, the Single Supplemental EIR presented the Preferred Alternative with both a Land Use Plan and a Water Resources Plan in accordance with the Site Assignment. The Single Supplemental EIR also included plans that show the limits of site assignment and waste handling, the conceptual site plans for the proposed landfill expansion and relocation of the large handling facility as requested by MassDEP during the review of the Expanded NPC. The Single Supplemental EIR included a groundwater contour map which delineates where the nearest public drinking water supply is located.

The Single Supplemental EIR presented a detailed assessment of compliance with site suitability criteria for both the landfill and waste handling facility components of the project. The filing did not indicate that the Proponent would seek a waiver of any site suitability criteria by MassDEP. The Bourne Landfill is located over the Cape Cod Sole Source Aquifer, as designated by the EPA. However, the Single Supplemental EIR has established that there are no existing or potential public or private drinking water supplies downgradient from the Landfill. The Single EIR includes a letter from the Bourne Board of Health confirming that all previously identified downgradient water supply wells have been replaced with connections to the public water supply system. The Proponent also indicates that the project will comply with the 310 CMR 16.40(4)(a) related to agricultural lands. MassDEP indicates United States Department of Agriculture (USDA) mapping shows the presence of soil types associated with Prime, Unique, or State and Local Importance farmland designations on the property. The Single EIR included a site specific soil survey as attachment 12 which included test pits and an evaluation by a certified soil scientist to determine whether the USDA mapping is correct. MassDEP allows site specific soil surveys since the USDA soil surveys are based on soil examinations at 100-150 foot intervals. The site specific soil survey in the Single EIR did find some areas of agricultural lands, however as proposed all waste handling areas meet the agricultural land setback requirements of 310 CMR 16.40(4)(a). Therefore, MassDEP concludes that no waiver is required. [2] Compliance with site suitability criteria will be determined in subsequent permitting by the local board of health and MassDEP.

Emergency Authorization

According to the Single Supplemental EIR, the landfill is anticipated to play a leading role in responding to future emergency conditions on Cape Cod in order to ensure that the public health and the environment are protected. The Single Supplemental EIR included a request that MEPA review be waived for such emergencies such that deference is afforded to MassDEP for any technical oversight. Specifically, the Single Supplemental EIR requests presumptive approval to operate any or all of its facilities 24 hours per day, with a total inbound tonnage not to exceed 1,500 tons in any 24 hour period, for a minimum of five consecutive days, or 120 hours. The Single Supplemental EIR did not describe the anticipated future emergency conditions nor provide additional details on what may trigger the need for implementation of this scenario. I note the MEPA regulations already include provisions that address review of emergency actions necessary to avoid or eliminate an imminent threat to environmental resources or quality or public health or safety (301 CMR 11.13), though these provisions would be premised on the need for Agency Action by MassDEP.

Land Alteration/Stormwater

[2] Supplemental information provided by MassDEP dated December 29, 2020.

The new liner areas and area required for new structures and associated pavement will create 15.86 total acres of impervious area. The Single Supplemental EIR included both a graphic and narrative description of the impervious areas. The expansion of new impervious area on the 25-acre parcel will be for the landfill expansion and will be the portion of that parcel that is not currently paved or covered by a building. This area consists of approximately 10.28 acres. The expansion of new impervious area on the 12-acre parcel, which is currently undeveloped, will be for pavement, buildings and infrastructure to support the Large Handling Facility (LHF). The conceptual design of new impervious area is approximately 5.58 acres.

According to the Single Supplemental EIR, stormwater will be managed onsite through the use of diversion berms, swales, culverts, retention basins, and infiltration basins. The landfill has an established Stormwater Management Plan (SMP), which has evolved as the site has been developed. The current stormwater management facilities consist of a series of engineered runoff water quality diversion berms, let-down channels, perimeter swales, culverts and sedimentation/retention basins. The site is divided into three drainage basins. Generally, the northern two thirds of the western side of the site, which includes the site's access road and the northern and western sides of the landfill, drain to Stormwater Basin # 1 as tributary flows to a drainage swale along the western side of the landfill. The eastern side of the landfill and southern third of the site drains to Stormwater Basin #2. The interceptor is designed to collect flow at critical phase points at the toe of the eastern sideslope for Phases 6, 7 and 8 landfills. The Town is permitted to accept both fly ash and bottom ash for disposal, however the majority of ash they accept is bottom ash. All stormwater that comes into contact with solid waste including fly ash and bottom ash and/or daily cover is collected and controlled as leachate.[3] According to the Single Supplemental EIR, all site runoff from developed areas of the site drains to either of these two basins. Each basin completely discharges to groundwater. The Single Supplemental EIR contains a SMP that takes into account the proposed full site buildout and provides details on stormwater management during the construction period.

Rare Species

According to the Single Supplemental EIR, portions of the project site are located within mapped habitat of the Eastern Box Turtle *(Terrapene carolina),* which is state-listed as a species of Special Concern. This species and its habitat are protected pursuant to the Massachusetts Endangered Species Act (MESA; MGL c.131A) and its implementing regulations (321 CMR 10.00). Comments from NHESP indicate that the project is anticipated to result in a Take and, therefore, will require a CMP pursuant to 321 CMR 10.23. Projects resulting in a Take of state-listed species may be permitted only if they meet the performance standards for a CMP. In order for a project to qualify for a CMP, the Town must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species. The Single Supplemental EIR indicated the Town intends to meet these performance standards by permanently protecting off-site land in the vicinity of the site as open space and state-listed species habitat. NHESP anticipates that the project will provide a suitable long-term net benefit and meet the

[3] Supplemental information provided by MassDEP dated December 29, 2020

performance standards for issuance of a CMP.

The Single Supplemental EIR provided an update on consultation with the NHESP and included additional details on how the project will provide a suitable long-term net benefit and meet the performance standards for issuance of a CMP. The Town has researched parcels in the nearby area that would provide suitable mitigation and could be placed under permanent protection. This research has yielded a candidate parcel. The Town is preparing an assessment of the parcels for NHESP review to ensure that they are suitable. Comments from NHESP indicate that the Town intends to meet the performance standards of a CMP by permanently protecting off-site land as open space and state-listed species habitat through fee conveyance to the Town of Bourne Conservation Commission. According to NHESP the Town has identified a candidate parcel in the vicinity of the property which should provide an acceptable option to address the required long-term net benefit for Eastern Box Turtle associated with the project. The Town may also propose to permanently protect portions of the property, as shown on the "Conceptual Site Buildout Plan" included in the Single Supplemental EIR. Although the exact details of the long-term net benefit required under a CMP have not yet been finalized, NHESP anticipates that a suitable long-term net benefit can be achieved through the protection of high quality off- and on-site habitat and that the project should be able to meet the performance standards of a CMP.

Climate Change and GHG Emissions

Adaptation and Resiliency

The Town is a participant in the Commonwealth's Municipal Vulnerability Preparedness (MVP) program. The MVP program is a community-driven process to define natural and climate-related hazards, identify existing and future vulnerabilities and strengths of infrastructure, environmental resources and vulnerable populations, and develop, prioritize and implement specific actions the Town can take to reduce risk and build resilience.

To aid in this assessment, the Town consulted resilientMA.org which contains a report entitled, Massachusetts Climate Change Projections - Statewide and for Major Drainage Basins Temperature, Precipitation, and Sea Level Rise Projections, prepared by the Northeast Climate Adaptation Science Center at the University of Massachusetts Amherst. The Single Supplemental EIR indicated that the Town has reviewed the prediction for sea level change noted in the report. The "Extreme", or maximum physically plausible case, sea level rise scenario for as far into the future as the year 2100, predicts a maximum rise of 10.3 feet above current (or mean) sea level. Phase 9 will increase the maximum height of the Landfill from elevation 185 feet mean sea level (MSL) to elevation 225 feet MSL over previously lined and filled areas of the landfill including Phases 2, 2A/3A, 3, 4, 5 and 6. The Single Supplemental EIR concluded that the designs for the expansion of the Bourne Landfill and associated waste management and handling facilities would not be directly affected by this change because the facility is located on one of the highest points on Cape Cod and has elevations ranging from approximately 144 feet MSL to 90 feet MSL along the perimeter of the facility. The maximum predicted sea level rise of 10.3 feet MSL is well below this level as contained Massachusetts Climate Change Projections.

In addition to sea level rise, the Town considered predictive modeling regarding increases in precipitation during the design of its stormwater management systems. The model shows for the Buzzards Bay basin that by the end of the century in the 2090s, the maximum increase in annual

precipitation is predicted to be between 0.3 and 6.8 inches from the observed baseline amount of 47.8 inches per year. The model also shows predictions in the 2090s for the Cape Cod Basin, which is to the north of the facility, ranging from a decrease of 0.8 inches to an increase of 5.5 inches from the observed baseline amount of 44.9 inches per year. The Single Supplemental EIR states that the SMS systems at the ISWM facility are capable of handling this projected increase with available capacity and proposed drainage basins above the current 100-year storm event.

Greenhouse Gas Emissions (GHG)

This project is subject to review under the May 5, 2010 MEPA GHG Policy. The Policy requires Proponents to quantify carbon dioxide (CO_2) emissions and identify measures to avoid, minimize or mitigate such emissions. As previously disclosed in the Expanded NPC, a major reduction in the production of GHGs has been achieved by shifting the waste the Town accepts. As required by the Scope, the Town provided an update on its contract with SEMASS and an analysis of alternative scenarios, should this contract be suspended and the landfill returned to acceptance of MSW waste. Approximately 86 percent of its annual tonnage is in the form of municipal combustor ash (MCA) which does not produce gases. The Town's 10-year contract to accept MCA from SEMASS will terminate at the end of 2021. The Town intends to extend the contract and to continue accepting up to 189,000 tpy of MCA and 30,000 tpy of biodegradable MSW from Bourne and Falmouth (Scenario 1). However, if the contract is not extended, the Town will return to accepting up to 219,000 tpy of biodegradable municipal solid waste (MSW) (Scenario 2). The Single Supplemental EIR reiterated from the Expanded NPC that Scenario 2 would generate a total of 815,844 tons of GHG emissions over this period. The Town's preferred scenario (Scenario 1), representing continued acceptance of MCA, would decrease GHG emissions by 425,138 total tons over the 40 year period (2021 through 2041) compared to Scenario 2. This represents an approximate 52 percent reduction in GHG emissions compared to Scenario 2.

The Single EIR included a commitment to explore various options to utilize landfill gas as an energy source and identified the possibility of the installation of a solar photovoltaic array on the Landfill under both Scenario 1 and Scenario 2. Comments from MassDEP indicate any of the landfill gas use options that are described in the Single Supplemental EIR will require air permitting by MassDEP. The Single Supplemental EIR did not identify any additional measures which will be implemented to reduce GHG emissions should Scenario 2 occur if the SEMASS contract were not renewed. However, the Proponent indicates that the existing landfill gas collection is designed to capture and reuse 95% of gas emissions, and this rate will be maintained in either scenario. The Proponent reiterates that several other measures will continue to be explored to further GHG emissions, including, in particular: recovering thermal energy; operation of an animal crematory that would use the LFG as a fuel; vertical axis wind turbines; use of compressed natural gas for trucks; and, regional composting.

Construction Period

The Single Supplemental EIR identified construction period impacts including increases in construction related truck traffic, dust, noise, stormwater runoff, and construction waste. Mitigation measures identified in the Single Supplemental EIR include implementation of a traffic control and construction management plan, dust suppression measures, and construction waste management and recycling.

All construction and demolition activities will be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The project will include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). The Town plans to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. If oil and/or hazardous materials are found during construction, the Town will notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits.

Mitigation and Draft Section 61 Findings

The Single Supplemental EIR contained a separate chapter on mitigation measures and draft Section 61 Findings for each Agency taking action on the project. It described mitigation measures and contained a table demonstrating the responsible party for implementing mitigation, monetary amounts where applicable, and a schedule for implementation. The draft Section 61 Findings will serve as the primary template for State Agency Permit conditions, and should be revised or updated as appropriate based on comments received and further consultation with Agencies after issuance of this Certificate. As described in the Single Supplemental EIR and prior MEPA documents, the Proponent has committed to implement the following measures to avoid, minimize, and mitigate environmental impacts:

MITIGATION MEASURE	IMPLEMENTATION SCHEDULE	COST ESTIMATE
Phased construction of Phase 7 & 8 double composite liner and leachate collection systems.	Starting in 2027	$8,000,000
Continue on-going environmental monitoring of groundwater quality and landfill gas migration.	Until 30 years after the close of the landfill.	$80,000/yr
Phased construction of final closure caps, including gas collections system extension, starting with Phase 9 and continuing as areas reach final subgrades.	Starting in 2022	$12,000,000
Construct stormwater management facilities, as part of the construction of the Large Handling Facility (LHF).	Starting in 2024	$800,000

Mitigate GHG by continuing to operate gas collection & treatment system, install solar photovoltaic arrays and evaluate other GHG mitigation measures. As heavy equipment is replaced purchase EPA air quality compliant equipment.	Ongoing operations with solar arrays added following area closure completions.	$ 1,000,000
Enforce noise mitigation measures during construction and operations.	For the life of the Facility	$1,000/yr
Enforce dust mitigation measures during construction and operations, including road sweeping and water applications.	For the life of the Facility	$10,000/yr
Enforce odor mitigation measures during construction and operations, including continued operation of gas collection and treatment system, as included above.	For the life of the Facility	$50,000/yr
Enforce vermin mitigation measures during construction and operations, including proper cover placement and maintaining exterminator services.	For the life of the Facility	$30,000/yr
Enforce litter mitigation measures during operations, including maintenance of fencing, cover application and litter patrols.	For the life of the Facility	$70,000/yr

For Rare Species:

MITIGATION MEASURE	IMPLEMENTATION SCHEDULE	COST ESTIMATE
Prepare and negotiate a Conservation Management Plan with NHESP.	Starting in 2020	$75,000
Purchase proposed compensatory, mitigation properties.	2021	$250,000

For Construction Period:

The measures that will be undertaken include:

- compliance with MassDEP regulations regarding air pollution control;
- designating areas for storage of equipment and supplies;
- ensuring that contractors keep all work areas neat and free from unsecuredsupplies such as gasoline, diesel fuel and other petroleum products;
- dust control measures such as regular road sweeping and watering as needed;

- requirement of a site-specific Health and Safety Plan by all contractors;
- installation of stormwater control structures to manage all stormwater on-site;
- requirement of a site-specific Erosion Control Plan by all contractors;
- requirement to follow anti-idling requirements;
- use of ultra-low sulfur diesel fuel (ULSD);
- use of and purchase of equipment with current low-emission engine types or other control mechanisms, including Tier 4 standards for engines (file maintained on-site); and
- coordination of on-site disposal and diversion of waste with the Town management to comply with waste bans and encourage recycling and diversion.

The Town will provide a GHG self-certification document to the MEPA Office that is signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) and indicates that all of the required mitigation measures, or their equivalents, have been completed.

Conclusion

Based on a review of the Single Supplemental EIR, comment letters, and consultation with State Agencies, I find that the Single Supplemental EIR adequately and properly complies with MEPA and its implementing regulations. State Agencies shall forward their final Section 61 Findings for publication in the Environmental Monitor.

K. Theoharides

December 30, 2020
Date

Kathleen A. Theoharides

Comments received:

12/17/2020	Natural Heritage & Endangered Species Program (NHESP), Massachusetts Division of Fisheries & Wildlife
12/23/2020	Conservation Law Foundation (CLF) in behalf of Beyond Plastics, Clean Water Action, Community Action Works, the Global Alliance for Incinerator Alternatives, Massachusetts Rivers Alliance, MASSPIRG, Saugus Action Volunteers for the Environment, the Saugus River Watershed Council, Sierra Club, and Sustainable Practices
12/23/2020	Cape Cod Commission (CCC)
12/23/2020	Massachusetts Department of Environmental Protection (MassDEP) – Southeast Regional Office (SERO)

KAT/ACC/acc

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CAPE COD COMMISSION

Via Email

December 23, 2020
Kathleen A. Theoharides, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, Anne Canaday, MEPA Analyst
100 Cambridge Street, Suite 900, Boston, MA 02114

Re: Single Supplemental Environmental Impact Report (SSEIR)- EEA No. 11333- CCC File No. 20064
Town of Bourne Integrated Solid Waste Management Facility- Proposed Phases 7, 8 & 9

Dear Secretary Theoharides:

The following comments on the above-referenced matter are arranged by relevant issue areas from the Cape Cod Regional Policy Plan (RPP):

Natural Resources (Wetlands; Wildlife and Plant Habitat; Open Space)

As part of its Development of Regional Impact (DRI) review after MEPA review concludes, the Cape Cod Commission will consider the proposed development's impacts on natural resources like wetlands, wildlife and plant habitat, and open space, and assess the project's consistency with natural resources goals and objectives set out in the Cape Cod Regional Policy Plan.

As noted in the SSEIR, the Town is preparing a Natural Resources Inventory (NRI), which will facilitate the CCC's DRI review with respect to natural resources. There are a variety of mapped natural resource areas located on the project site, which among other resources, should be addressed in the NRI: Priority Habitat for eastern box turtle (a state-listed species of special concern); Prime Farmland soils; and BioMap2 Critical Natural Landscape (CNL). CNL areas provide habitat for a wide-range of native species, support intact ecological processes, maintain connectivity among habitats, enhance ecological resilience to natural and anthropogenic disturbances, and provide important ecological services including filtering air and water and storing and sequestering greenhouse gases. The characteristics of the CNL areas on or contiguous with the project site (such as extend onto Joint Base Cape Cod) include a large, intact area of forest, wetlands, and ponds. The undeveloped 12-acre southern parcel that makes up the project site is mapped CNL; on this basis, this entire parcel is considered a Natural Area Placetype for purposes of DRI review.

There are other important natural resource areas present within vicinity of the project site- protected open space, the Bourne Back River Area of Critical Environmental Concern, an Important Bird Area, and various wetlands, vernal pools, and their buffers- however, these natural resource areas are not anticipated to be directly or adversely impacted by the project.

The Town and its consultant have been in contact with Commission staff to confirm that the NRI is being prepared in accordance with the CCC's policies and regulations. Commission staff look forward to reviewing the NRI and working with the Town and its consultant on approaches to natural resources protection and mitigation. Staff notes that DRIs with impacts on natural resources are required to provide open space offsets appropriate to context up to a ratio of 3:1 (protected open space: development), calculated and proposed per the CCCs Open Space Technical Bulletin. According to the SSEIR, the Town is in close

communication and coordination with NHESP regarding Conservation and Management Permit for proposed development on the southern 12-acre parcel in box turtle habitat, and has identified open space offset land at the 1.5:1 ratio required by NHESP. Commission staff are available to review proposed open space offsets with the Town and NHESP to ensure the approach satisfies both NHESP and CCC objectives.

Water Resources

The primary RPP water resources interests relating to proposed Phases 7, 8, and 9 are the management of stormwater during construction, and during operations at full buildout. The SSEIR includes discussion of the potential impacts to groundwater as part of the Potential Section 61 Finding, which impacts are expected to be negligible as landfill leachate and condensate will continue to be collected and treated in the same manner as currently, and no new additional wastewater facilities are proposed. The SSEIR also includes an extensive discussion of the various reasons why private or public water supply wells are prevented from being installed downgradient of the ISWM, which minimize potential sensitive receptors that could be impacted by the landfill expansion activities. Further submittals during the CCCs DRI review should, however, provide additional detail regarding the sizing and location of any new septic systems installed in conjunction with the relocation of ISWM department offices and other operational facilities onsite.

The SSEIR includes a narrative and calculations regarding the planned stormwater management system to be employed at full buildout. The additional phases of landfill expansion are expected to slightly change the areas which contribute to several existing stormwater facilities, but significant changes to the volumes of flow to each basin are not anticipated. Phase 7 and 8 construction will require the abandonment of Stormwater Basin 2 and construction of a replacement basin (Stormwater Basin 3), as well as attendant stormwater management infrastructure to treat runoff from the new paved and rooftop areas, and will connect previous areas utilizing Stormwater Basin 2 to the new Stormwater Basin 3. A narrative and supporting calculations for the planned stormwater system at full buildout have been provided with the SSEIR. Reiterating comments provided during the ENPC process, CCC staff requests that the Town, in its DRI application, provide a clear description of which stormwater conveyances and treatment structures will be abandoned to facilitate Phase 8 landfill expansion, and provide details regarding the design and construction phasing for new stormwater infrastructure, to insure that adequate stormwater treatment will be provided throughout the long-term phased expansion plan.

Thank you for the opportunity to comment. Commission staff are available to discuss any questions you might have about these comments.

Sincerely,

Kristy Senatori

Kristy Senatori
Executive Director

Cc: Project File
Phil Goddard, Bourne ISWM Department, via email
Bourne Cape Cod Commission Representative via email
Cape Cod Commission Chair via email
Cape Cod Commission Committee on Planning and Regulation Chair via email

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For a thriving New England

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December 23, 2020

Via Electronic Mail

Kathleen A. Theoharides
Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Anne Canaday, Environmental Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Town of Bourne (Bourne), Department of Integrated Solid Waste Management, Integrated Solid Waste Management Facility (Facility), November 13, 2020 Single Supplemental Environmental Impact Report, EEA No. 11333

Dear Secretary Theoharides:

Conservation Law Foundation (CLF), Beyond Plastics, Clean Water Action, Community Action Works, the Global Alliance for Incinerator Alternatives, Massachusetts Rivers Alliance, MASSPIRG, Saugus Action Volunteers for the Environment, the Saugus River Watershed Council, Sierra Club, and Sustainable Practices, respectfully submit these comments in opposition to the Town of Bourne's Phase 7, 8, and 9 Integrated Solid Waste Management Facility expansion as proposed in the Town's November 13, 2020 Single Supplemental Environmental Impact Report (SSEIR).

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As discussed below, meaningful opportunities for public review of the expansion's potential environmental impacts have not been provided. Additionally, Bourne's proposed expansion of 25-acres and 5,175,000 cubic yards of capacity to its current facility would be a threat to public health and the environment and would continue to undermine the need to responsibly manage waste through source reduction, recycling, and composting.

CLF is a nonprofit, member-supported, environmental organization working to conserve natural resources, protect public health, and promote thriving communities for all in the New England region, including Massachusetts. CLF has a long history of advocating for clean air, clean water, and healthy communities, including addressing the environmental and community impacts of solid waste disposal, and advocating for waste management strategies focused on waste reduction and recycling as opposed to landfilling and incineration. Other signatory organizations share CLF's commitment to protecting environmental resources and public health.

For the reasons set forth herein, Bourne's SSEIR is inadequate and the Phase 7, 8, and 9 expansion should undergo a full and rigorous MEPA review, starting with the submission of an Environmental Notification Form (ENF), and Draft and Final Environmental Impact Reports.

I. Introduction

A. The Bourne Landfill's History and Development

The Bourne Landfill is comprised of a 111-acre parcel located at 201 MacArthur Boulevard in Bourne, Massachusetts.[1] Landfill operations began at the Facility in 1967 with Phase 1 (approximately 31 acres).[2] In 1998, the Town of Bourne, Department of Integrated Solid Waste Management (ISWM) was created and began overseeing the management and operation of the Landfill.[3] The current Facility operations include the active lined landfill, construction and demolition debris transfer station, residential recycling center, single stream recyclable collection and transfer, and composting.[4]

The Facility contains both lined and unlined waste disposal areas. The oldest portion of the landfill is comprised of Phases 1A, 1B, 1C and 1D, all of which are unlined cells.[5] Phases 1A, 1B, and 1C (approximately 23 acres) have been closed and capped. Phase 1D (5.7 acres) was excavated under a pilot landfill reclamation project with MassDEP in order to create additional landfill space.[6] Phase 2 (approximately 7.3 acres) is a closed, lined, and capped landfill cell, and Phase 3 (approximately 12 acres) is a closed, double composite lined landfill cell. Both Phase 2 and 3 have leachate collection systems.[7] Phase 2A/3A (approximately 17.1 acres) is an inactive double composite lined landfill area. Phase 4 (approximately 9.9 acres) is a currently active

[1] *Final Comprehensive Site Assessment* (CSA), June 5, 2017, Page 2.
[2] *CSA*, Page 3.
[3] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 2.
[4] *CSA*, Page 2.
[5] Town of Bourne, *Expanded NPC Certificate*, April 24, 2020, Page 3.
[6] *Id.*
[7] *Id.*

landfill area and is located in the area previously occupied by Phase 1D. Phase 5 consists of a vertical expansion over Phases 1A, 1B, and 1C.[8] MassDEP issued Authorization to Construct (ATC) and Authorization to Operate (ATO) Permits in 2019 for Phase 6, which is currently under construction.[9] Phase 6 is the last phase in a progressive filling plan first discussed in the Town's 1998 Environmental Impact Report (EIR), which will complete the horizontal expansion of landfill operations on the original 74-acre site.[10]

In 2001, Bourne purchased a 25-acre parcel immediately abutting the landfill to the south.[11] This parcel has been site-assigned for solid waste handling and transfer operations.[12] Thus far, this parcel has only been used for recycling and transfer operations.[13] In 2016, Bourne purchased an approximately 12-acre parcel to the south of the 25-acre parcel.[14] Bourne intends to relocate the handling facility onto a portion of the 12-acre parcel so that Phases 7 and 8 can be fully developed on the 25-acre site.[15]

B. Waste Disposal and Capacity

Prior to 1998, the Landfill accepted residential and commercial waste from Bourne and the immediate surrounding area.[16] From 1998 through 2014, the Landfill operated as a large regional disposal facility accepting residential and commercial solid waste that was largely Municipal Solid Waste (MSW) but with an increasing percentage comprised of municipal waste combustor ash.[17]

In 2015, Bourne signed a long-term contract with Covanta SEMASS (SEMASS), a municipal waste combustor located in Rochester, MA, which shifted the Landfill's waste stream to predominantly ash.[18] Under the contract, approximately 86% of the landfill's permitted annual capacity (189,000 tons out of 219,000 tons per year) is reserved exclusively for ash through 2021.[19] The remaining capacity is available for MSW disposal for residents of Bourne and Falmouth under a ten-year contract.[20] Any further remaining capacity will either be held in reserve or be utilized for soils or other difficult-to-manage waste streams.[21] ISWM and Covanta are currently in active negotiations to extend their contract. Under Bourne's "Preferred

[8] *Id.*
[9] *Id.*
[10] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 3.
[11] *Id.*
[12] *Id.*
[13] *Id.*
[14] *Id.*
[15] *Id.*
[16] Town of Bourne, *Single Supplemental Environmental Impact Report*, May 2018, Page 21.
[17] *Id.*
[18] *Id.*
[19] *Id.*
[20] *Id.* at 11.
[21] *Id.*

Alternative" approach, the contract will extend and the Town will continue to accept up to 189,000 tons per year of ash[22] and 30,000 tons per year of MSW from Bourne and Falmouth.[23]

C. The Proposed Expansion

In February 2020, Bourne submitted an Expanded Notice of Project Change (ENPC), acting as an Expanded Environmental Notification Form (ENF), for the development of Phases 7, 8, and 9 of the Landfill.[24] In its ENPC, Bourne requested permission to submit a Single Supplemental Environmental Impact Report (SSEIR) in lieu of a draft and final EIR.[25] The Secretary of the Executive Office of Energy and Environmental Affairs issued a Certificate on the ENPC on April 24, 2020, granting Bourne's request to submit an SSEIR, but reserving the right to find this submission inadequate.[26]

As described in the ENPC, the proposed Project consists of the phased expansion (Phases 7, 8, and 9) of the Bourne Integrated Solid Waste Management Facility (ISWMF).[27] Bourne is proposing a 25-acre vertical and horizontal landfill expansion and the relocation of the solid waste handling facility and other offices and facilities on the property. The three-phase expansion will provide a total of 5,175,000 cubic yards (cy) of disposal capacity through 2040.[28]

Phases 7 and 8 are a 25-acre horizontal expansion that will result in an additional 3,920,000 cy of disposal capacity through 2040. Phase 9 is a 40-foot vertical expansion over the entire footprint of the currently permitted landfill that will provide approximately 1,255,000 cy of disposal capacity through 2040.[29]

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[22] As discussed more fully below, Bourne accepts approximately 44,000 tons of bottom ash each year. Therefore, the total amount of ash accepted by Bourne is over 230,000 tons every year, significantly more than the stated 189,000 tons.
[23] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 10.
[24] Town of Bourne, *Expanded Notice of Project Change*, February 2020, Page 4.
[25] *Id.*
[26] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 1. The Secretary erroneously granted Bourne's request to submit an SSEIR because the ENPC does not meet the requirements of 301 CMR 11.06(8). Additionally, the Secretary should not determine that the SSEIR is adequate because it does not sufficiently describe certain aspects and issues of the Project as required by 301 CMR 11.08(8)(d).
[27] Town of Bourne, *Expanded Notice of Project Change*, February 2020.
[28] Town of Bourne, *Expanded NPC Certificate*, April 24, 2020, Page 2.
[29] *Id.*

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II. A Comprehensive Review of the Potential Environmental Impacts of the Phase 7, 8, and 9 Expansion Has Not Been Undertaken, Nor Has the Public Been Provided with a Meaningful Opportunity to Review these Impacts

A. The Bourne Landfill Expansion has Consisted of Many Phases Over Twenty Years and has a Long Record that is Impossible for the Public to Fully Access

The Bourne landfill expansion has consisted of many phases over twenty years and has been the subject of seven NPCs. However, it is impossible for the public to access the majority of Project documents and to meaningfully review the Project's potential environmental impacts.

MEPA filings can be accessed electronically through the *Environmental Monitor* and the *Environmental Monitor Archives.* Filings made between 2002 and September 9, 2009 are only available in the *Environmental Monitor Archives*, while filings made from September 23, 2009 through the present are available in the *Environmental Monitor*. Filings made prior to 2002 are entirely unavailable though the online portal. Consequently, in order to access filings related to longstanding projects, one potentially must access and search multiple databases.[30] Even then, because the online portals only include records after 2002, any search of the online portal will fail to provide a complete disclosure of all records related to certain projects.[31]

Significantly, the missing documents for the Bourne project include the initial Environmental Notification Form (ENF), Draft Environmental Impact Report (DEIR), Final Environmental Impact Report (FEIR), and several NPCs. These documents are crucial to a complete understanding of the Project's scope and its environmental impacts and, in fact, are referenced repeatedly in later filings. For example, Bourne states in its SSEIR that the mitigation of impacts from solid waste disposal at the landfill was adequately addressed in the original FEIR and the Cape Cod Commission's initial Development of Regional Impact (DRI) review.[32] However, the FEIR that Bourne submitted in 1999 only described a buildout through Phase 6 and did not even address Phases 7, 8, and 9. *Thus, a comprehensive review of the potential impacts of Phases 7, 8, and 9 has never been undertaken.*

Bourne has also been granted waivers from various MEPA requirements based in part on the alleged adequacy of its earlier project filings and actions. Indeed, Bourne was recently allowed to submit a SSEIR in lieu of the usual two-stage Draft and Final EIR.[33] *However, because the public cannot access all relevant MEPA submissions, it is impossible to verify that all proper procedures were followed and that this waiver was appropriate.* These deficiencies in

[30] Additionally, the database system for accessing documents is complex, difficult to navigate, and does not allow the public to obtain all project documents through a simple and direct project name or EEA number search. Instead, one must search individual issues of the *Environmental Monitor* or *Environmental Monitor Archives* in an attempt to locate the relevant records.

[31] This is particularly problematic because members of the public can no longer physically review files at the MEPA office because of the COVID pandemic.

[32] Town of Bourne, *Expanded Notice of Project Change*, February 2020, Page 86.

[33] *Certificate of the Secretary of Energy and Environmental Affairs on the Expanded Notice of Project Change*, April 24, 2020.

the MEPA process have made it impossible for the public to fully understand the scope of the landfill expansion project and its potential environmental impacts. *For these reasons, Bourne's SSEIR is inadequate and the expansion should undergo a full MEPA review, starting with the submission of an ENF, DEIR and FEIR.*

B. Every Year the Bourne Landfill is Burying Much More Ash Than Its Permitted Capacity and Its MEPA Filings Should be Resubmitted to Reflect This

According to its SSEIR, under Bourne's "Preferred Alternative" approach, 189,000 tons of permitted capacity would be reserved exclusively for ash through 2021.[34] The remaining capacity, about 30,000 tons per year, would be available for MSW disposal for residents of Bourne and Falmouth under a ten-year contract.[35] However, Bourne ISWM has reported to MassDEP that it landfills much more than 219,000 tons of waste each year. Every year 43,478 tons of "Bottom" Ash, and as much as 50,000 tons of contaminated soil and "other" materials, are disposed of at the Bourne Landfill as "cover."[36] For a predominantly ash landfill to use that much cover is ridiculous – until one remembers that ISWM can charge for cover materials. In 2019 about a third of what was buried at the landfill was cover (96,324 tons of cover for 207,987 tons of permitted waste, for a total of over 300,000 tons).[37] Bourne is ignoring capacity limits and instead filling this Facility with incinerator ash and other materials as quickly as possible.

To put this in perspective, the Shrewbury Ash Landfill buried 362,822 tons of mostly ash waste in 2019, but only used about 10,000 tons of cover materials, none of which was ash. Similarly, the Haverhill, Ward Hill Neck Ash Landfill buried 161,575 tons of ash and MSW in 2019, but only used 33,179 tons of cover, none of which was ash.

Given that the Bourne Landfill buries about 44,000 tons of Bottom Ash from SEMASS every year, it should be required to apply for a permit for a higher, and honest, fill rate that includes the 44,000 tons. Furthermore, ISWM should be required to revise and resubmit its ENF, DEIR, and FEIR to reflect this significant difference.

It is deeply concerning that the cover includes almost exactly 44,000 tons of Bottom Ash every year. If this is the case, the 189,000 tons of ash buried at the Bourne Landfill each year may have a higher percentage of Fly Ash, which is the more toxic of the two types of incinerator ash discussed in Bourne's MEPA filings. When ISWM refiles its MEPA reports, exactly what kind of ash they are disposing of should be investigated more carefully. SEMASS produces about 275,000 tons of ash each year. Is the Bourne Landfill getting a disproportionate amount of SEMASS's Fly Ash? If so, expanding this Landfill is even more dangerous than the information currently before us indicates. This should be thoroughly investigated through the MEPA process.

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[34] *Id.*
[35] *Id.* at 11.
[36] The Bourne Landfill buries almost exactly 43,500 tons of Bottom Ash as "cover" each year. *See* Attachment 1, *Annual Solid Waste Facility Reports: Landfill Summary for Calendar Years 2015-2019.*
[37] *Id.*

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C. The Proposed Expansion would be Unnecessary if Zero Waste Programs Were Enforced and Expanded

ISWM is asserting that there is a need for additional capacity at the Bourne Landfill due to future reductions in regional capacity. Increasing regional capacity, however, runs directly counter to MassDEP's 2010-2020 Solid Waste Master Plan and Draft 2030 Solid Waste Master Plan goals to reduce solid waste disposal.[38] The Commonwealth failed to meet MassDEP's goals, and disposal actually increased from 5,430,000 tons per year in 2010 to 5,510,000 tons per year in 2019.[39] Since 2010, permitted combustion of waste, and the resultant ash, has not changed at all in Massachusetts.[40] Increasing the acreage of the Bourne Landfill so that it is large enough to accept more than 230,000 tons of ash and 30,000 tons of MSW per year for twenty more years guarantees that the disposal numbers of 2019 will remain unchanged in 2030 and 2040. This is unacceptable.

The expansion of the Bourne Landfill is not just about landfill capacity – it is about allowing Covanta SEMASS in Rochester, Massachusetts to burn up to 1.25 million tons per year of MSW.[41] Burning MSW is dangerous, polluting, expensive, a waste of resources, an inefficient manner to generate electricity, and horrible for the climate. If Massachusetts is to meet any of its long-term climate goals, then its seven incinerators, including SEMASS, will have to be shut down. Attached as Exhibit 2, please find a letter attached that provides further facts and resources explaining why Massachusetts' immediate goal should be to phase out incinerators, including SEMASS, as soon as possible, rather than to enable their continued operation through expanded landfill capacity.

Furthermore, if MassDEP enforced existing state regulations, SEMASS and the expansion of the Bourne Landfill would be unnecessary. In Massachusetts, the following are Waste Ban Items, meaning that they are not allowed to be buried in a landfill or burned in an incinerator (310 CMR 19.00):

- Asphalt pavement, brick, and concrete;
- Cathode ray tubes;
- Clean gypsum wallboard;
- Commercial food material (recently revised to include producers of more than half a ton per week – not promulgated yet);
- Ferrous and non-ferrous metals;
- Glass and metal containers;
- Lead acid batteries;

[38] MassDEP, Draft for Public Comment: Massachusetts 2030 Solid Waste Master Plan, 6-7 (September 2019), available at https://www.mass.gov/doc/draft-2030-solid-waste-master-plan/download.
[39] Solid Waste Advisory Committee, MassDEP, *2019 Solid Waste & Waste Reduction Data*, slide 6 (October 2020), available at https://www.mass.gov/doc/presentation-2019-solid-waste-waste-reduction-data/download.
[40] *Id.*, slide 12.
[41] *Id.*

- Leaves and yard waste;
- Recyclable paper, cardboard, and paperboard;
- Single-resin narrow-necked plastic containers;
- Treated and untreated wood and wood waste (banned from landfills only);
- White goods (large appliances);
- Whole tires (banned from landfills only; shredded tires acceptable); and
- Textiles and Mattresses (recently added – not promulgated yet)

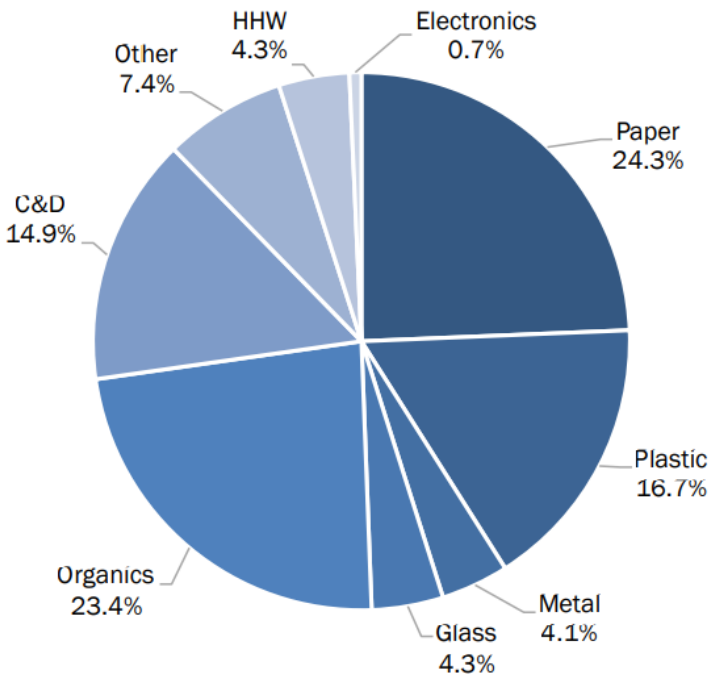
These materials are banned from disposal because it has been determined that: (a) disposal of the material presents a potential adverse impact to human health, safety or the environment; (b) a restriction or prohibition will result in the extension of the useful life or capacity of a facility or class of facilities or reduce its environmental impact; or (c) a restriction or prohibition will promote reuse, waste reduction, or recycling.[42] Unfortunately, according to MassDEP, almost 40%, or over 2 million tons, of disposed items in Massachusetts are Waste Ban Items.[43] There are not enough dedicated Waste Ban inspectors at MassDEP, and enforcement has been spotty at best. No disposal facility should be expanded in Massachusetts until MassDEP reduces disposal by enforcing existing Waste Ban regulations.

Much of the waste burned at SEMASS – paper/cardboard, metal, glass, some plastic, some construction and demolition material, and some organics, are also Waste Ban Items. If the Waste Ban materials alone were diverted from the incinerator, SEMASS could burn at least 40% less and extend the life of the landfill where it buries its ash.[44]

Furthermore, expanding the Bourne Landfill enables other facilities to shirk their responsibility to reduce solid waste disposal. For example, Bourne has contracted with SEMASS to accept ash generated from incinerating waste. SEMASS burned over 1.1 million tons of waste in 2019,[45] producing more than 250,000 tons of ash. As can be seen from the chart below, which SEMASS submitted as part of a report to MassDEP in February of 2020, almost 80% of what SEMASS is burning could be recycled and composted. Rather than needing to bury 250,000 tons of ash, SEMASS would then only need to dispose of 50,000 tons of ash each year.

[42] 310 CMR 19.017; *see also* MassDEP, *Massachusetts Waste Bans as a Tool to Drive Waste Reduction* (June 2016), available at https://www.mass.gov/guides/massdep-waste-disposal-bans.
[43] MassDEP, *Massachusetts Waste Bans as a Tool to Drive Waste Reduction* (June 2016), available at https://www.mass.gov/guides/massdep-waste-disposal-bans.
[44] *See* SAK Environmental, LLC, *Covanta SEMASS 2019 Waste Characterization Study in Support of Class II Recycling Program*, 2-11 (Feb. 11, 2020), available at https://www.mass.gov/doc/class-ii-recycling-program-waste-characterization-study-april-2020-3/download.
[45] *Id.*

Figure 3-1 Overall Waste Composition by Material Group



Similarly, the 30,000 tons of MSW buried each year at the Bourne Landfill could be sharply reduced – by as much as 80% if the Waste Bans were enforced and composting and recycling systems put in place. If this were done, the combined yearly disposal at Bourne Landfill would be 50,000 tons of ash and 6,000 tons of MSW – a fraction of what it is now. Minimizing the ash and MSW going into the Bourne Landfill would extend its life and render expansion moot. For these reasons, we recommend that the Waste Bans be enforced, and comprehensive recycling and composting programs be instituted rather than expanding the Bourne Landfill. Additionally, the Town should be required to revise and resubmit its ENF, DEIR, and FEIR to account for the actual amount of waste buried each year at the Landfill.

Additionally, while ISWM presents three expansion options for utilizing the remaining capacity at the Landfill, it does not provide enough information for these options to be evaluated in a meaningful way. Therefore, ISWM should be required to amend its MEPA filings to include the rate they use to calculate tonnage per cubic yard for ash, contaminated soil, and MSW. Furthermore, ISWM should detail how much capacity is available at the Landfill now, in cubic yards and in tons for each material, and how much additional capacity would be available if the Landfill were expanded as proposed. Reporting for disposal is always done in tons and presenting capacity in cubic yards is disingenuous. Compaction and material type lead to significant variation in how many tons per cubic yard can be buried at the landfill. ISWM must provide more information to clarify exactly what it is asking for.

Finally, because the above information about capacity is unclear, it is also unclear how long the expansion would allow the Landfill to operate vs. how much capacity already exists. MEPA should require ISWM to clarify this very central issue in a new ENF, DEIR, and FEIR.

III. The Landfill Expansion Poses a Threat to Public Health and the Environment

A. The Waste Buried at the Bourne Landfill is Extremely Toxic

1. Incinerator Ash

Bourne's contract to accept ash from SEMASS runs through to the end of 2021, with options to extend.[46] As a result, if the Phase 7, 8, and 9 expansion is permitted, 86% of the Facility's waste stream will continue to be comprised of toxic incinerator ash.[47] Incinerator ash is dangerous to human health, public safety, and the environment.

The incineration process produces two types of ash: fly ash from the air pollution control equipment, and bottom ash, which is the non-combustible residue remaining after combustion. Fly ash in particular has a high concentration of toxic compounds, and over the years has become more contaminated as improved air filtration equipment effectively removes more pollutants prior to emission.[48] These toxic compounds include dioxins, polychlorinated biphenyls (PCBs), polychlorinated naphthalenes (PCNs), and heavy metals, including lead, mercury, cadmium, and arsenic.[49] Dioxins have been described as the most toxic chemicals known to mankind and are recognized human carcinogens. Lead is known to cause cognitive and behavioral development in children. Mercury is known for its adverse impacts on the central nervous system, kidneys, and developing fetus. All of these compounds are known to be toxic to humans and animals.[50]

Ash generated by municipal solid waste incinerators constitutes hazardous waste. However, EPA allows for the highly toxic fly ash to be diluted prior to toxicity testing by mixing it with bottom ash and lime.[51] Diluting the fly ash allows incinerators to avoid hazardous waste

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[46] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 1.
[47] Bourne accepts approximately 44,000 tons of bottom ash each year. Therefore, the total amount of ash accepted by Bourne is over 230,000 tons every year, significantly more than the stated 189,000 tons.
[48] Global Alliance for Incinerator Alternatives, *Incinerators Trash Community Health*, 5 (June 2008), available at https://www.no-burn.org/wp-content/uploads/Incinerators-Trash-Community-Health.pdf; IPEN, *After Incineration: The Toxic Ash Problem* (April 2005), available at https://ipen.org/sites/default/files/documents/ipen_incineration_ash-en.pdf.
[49] Jeremy Thompson and Honor Anthony, *The Health Effects of Waste Incinerators*, Report of the British Society for Ecological Medicine, 2nd ed, 42-44 (June 2008), available at https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/project-submissions/2018/04/eastern-creek-energy-from-waste-facility-ssd-6236/20180521t165555/incinerator-report-health-effects-british-society-for-medicine.pdf.
[50] *Id.*
[51] Global Alliance for Incinerator Alternatives, *Incinerators Trash Community Health*, 5 (June 2008), available at https://www.no-burn.org/wp-content/uploads/Incinerators-Trash-Community-Health.pdf; IPEN, *After Incineration: The Toxic Ash Problem* (April 2005), available at https://ipen.org/sites/default/files/documents/ipen_incineration_ash-en.pdf.

regulations, but the ash itself is no less dangerous – the same toxic chemicals are merely spread out over a larger volume of combined ash. Further, incineration increases the mobility and bioavailability of toxic metals compared with raw municipal waste.[52] The potential for leaching is also greatest under acidic conditions, which occur when solid waste breaks down into organic acids.[53] Given that the Bourne Facility was originally used for solid waste, soil acidification has already likely occurred and may continue to do so, which will increase the risk of leaching. Ultimately, the larger the Bourne Landfill is, the more dangerous and toxic incinerator ash it will store - permanently.

2. Municipal Solid Waste (MSW)

Bourne accepts up to 30,000 tons per year of MSW. The heterogenous nature of MSW results in a varied mix of metals, plastics, organics, and other materials that pose serious human health risks. For example, plastics contribute significant quantities of cadmium, chromium, lead, manganese, and mercury. Paper contributes lead, manganese, mercury, copper, and zinc. Organic matter in MSW also contains toxicants, including pesticides, herbicides, PCBs, VOCs, and SVOCs.[54] VOCs include benzene, dichloromethane, 1,2-dichlorethylene, ethylene benzene, tetrachloroethylene, trichloroethylene, toluene, and vinyl chloride. These compounds are known to cause cancer and present a particularly significant risk to human health because of their high mobility.[55]

3. Contaminants of Emerging Concern

Polybrominated diphenyl ethers (PBDEs) and per and poly fluorinated alkyl substances (PFAS) are persistent organic pollutants that are found in virtually all landfills and are a serious public health concern. PBDEs, or flame retardants, are found in everyday household items, including cell phones, computers, mattresses, couches, and clothing.[56] Exposure to PBDEs has been linked to cancer and causes serious neurological and reproductive health problems.[57]

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[52] *Id.*
[53] Michelle Allsopp, Pat Costner, and Paul Johnston, *Incineration and Human Health: State Knowledge of the Impacts of Waste Incinerators*, Greenpeace Research Laboratories (March 2001), available at https://www.greenpeace.to/publications/euincin.pdf.
[54] United States Environmental Protection Agency, *Analysis of the Potential Effects of Toxics on Municipal Solid Waste Management Options* (April 1995).
[55] *Id.*
[56] F. Oliaei, Minnesota Pollution Control Agency, *Flame Retardants: Polybrominated Diphenyl Ethers (PBDEs) Background Paper*, 31 (2005); *see also* International Joint Commission, *Background on Polybrominated Diphenyl Ethers (PBDEs) Final Report*, (August 10, 2015), available at https://www.ijc.org/files/tinymce/uploaded/WQB/Appendix-B%20_Background_PBDEs.pdf.
[57] Thomas A. McDonald, Chemosphere, *A Perspective on the Potential Health Risks of PBDEs*, 745-755 (February 2002).

PFAS, or "forever chemicals," have been going into landfills for over sixty years,[58] and recent studies have identified PFAS in both fly ash and bottom ash from municipal waste incinerators at part-per- billion levels.[59] These chemicals are toxic in small concentrations and cause a variety of adverse health effects, including kidney and testicular cancer; impaired liver, pancreatic, and immune system function; thyroid disease; fertility and pregnancy issues; high blood pressure; and growth and learning problems in infants and children.[60] They are found in many of the products we use in our homes every day, including non-stick cookware, water-repellant clothing, stain resistant fabrics and carpets, dental floss, and food packaging.

When products containing PBDEs and PFAS make their way into landfills, as either MSW or incinerator ash waste, they inevitably leach into the air, soil, and water.[61] As the following section more fully discusses, all landfills leak and contaminate the environment. Given these facts, MassDEP should require the Town to enact testing protocols for the ash and leachate at the Landfill. These protocols should be fully discussed and analyzed in Bourne's next MEPA submission.

The waste buried at the Bourne landfill is extremely toxic and a threat to public health and the environment. For this reason, we oppose the Landfill's expansion. Additionally, Bourne's SSEIR is inadequate and the expansion should undergo a full MEPA review, starting with the submission of an ENF, DEIR and FEIR.

B. All Landfills Leak Toxic Chemicals and Contaminate the Environment

In the 1950s, landfills, or sanitary dumps, were just holes in the ground where waste was covered by a layer of soil to reduce odors and vermin. In the 1970s, compacted soil and clay liners were proposed for waste containment.[62] However, this technology was ultimately abandoned as ineffective at preventing leachate from escaping the landfill because a clay liner that is a foot thick will be breached in less than five years.[63] In the 1980s, landfills began installing plastic liners, but this method was also short-lived because plastic liners often develop holes during installation, continue to break down over time, and inevitably fail.

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[58] A.H. Huset, M.A. Barlaz, D.F. Barofsky, J.A. Field, 82 Chemosphere, *Quantitative determination of fluorochemicals in municipal landfill leachates*, 1380-1386 (2011).
[59] Dennis Wohlin, *Analysis of PFAS in ash from incineration facilities from Sweden*, (June 2020), Örebro University, School of Science and Technology. The Commonwealth of Massachusetts regulates 6 PFAS substances in Drinking Water and under the Massachusetts Contingency plan at part-per-trillion level concentrations.
[60] *See* MassDEP, *Per- and Polyfluoroalkyl Substances (PFAS)*, available at https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas#what-are-pfas-and-why-are-they-a-problem?-
[61] Landfill liners themselves contain PFAS chemicals.
[62] Overview of Subtitle D Landfill Design, Operation, Closure and Postclosure Care, 2 (January 2004), available at http://www.gfredlee.com/Landfills/LFoverviewMSW.pdf.
[63] G. Fred Lee & Associates, *Flawed Technology of Subtitle D Landfilling of Municipal Solid Waste*, updated 13 (January 2015).

Over time, regulations evolved to require composite liner systems[64] – originally in the form of a two-foot-thick clay liner and a 60 mil-thick layer of plastic sheeting (about the thickness of paperboard). Today, landfill developers use geosynthetic clay liners as a substitute for clay to create Dry Tomb Landfills. In theory, these Dry Tomb Landfills are meant to entomb the landfill in plastic sheeting, thereby keeping water away from the MSW and minimizing the production and migration of leachate through the soil and groundwater surrounding the landfill.

Unfortunately, while one or two composite liners may delay the release of leachate into the environment, they do not prevent it, and the failure of these double liner systems is not only inevitable, but often rapid. EPA has itself stated that, "no liner… can keep all liquids out of the ground for all time. Eventually liners will either degrade, tear, or crack and will allow liquid to migrate out of the unit."[65] For example, a geomembrane compacted clay composite liner system that was used to contain MSW landfill leachate was evaluated for 14 years and "field observation of the geomembrane revealed many defects, including holes, patches, and cracks," and "contaminant modelling of the entire lagoon liner suggest[ed] that the geomembrane liner most likely stopped being effective as a contaminant barrier to ionic species sometime between 0 and 4 years after the installation."[66]

Furthermore, leachate generation can continue for thousands of years, long after a landfill's operations have ceased.[67] Once a landfill cell is full, it is covered with gravel, a flexible plastic cap, and some sod. Landfill operators are then required to monitor the closed landfill for 30 years.[68] Unfortunately, the plastic caps develop holes over time, letting in more rain and snow, which leads to the production of more leachate and soil and groundwater contamination.

As described in its SSEIR, Bourne's leachate collection and storage systems for Phases 3-9 include double composite geosynthetic clay liners and 60-mil HDPE geomembranes.[69] Phases 1A, 1B, and 1C have no liner, and Phase 2 has a single composite liner.[70] This system is not sufficient to prevent toxic chemicals from leaking and contaminating the soil and water, and there is evidence that this contamination has already started to occur. According to Bourne's Comprehensive Site Assessment (CSA), fifty-one monitoring wells have been installed on-site and off-site to monitor the Facility and determine the vertical and horizontal extent of the

[64] In 1991, the United States Environmental Protection Agency promulgated regulations for landfilling municipal solid waste as part of the Resource Conservation Recovery Act, Subtitle D. Originally, Subtitle D required a single composite (plastic sheeting and compacted clay/geosynthetic) liner. It was later amended to require a two-liner system for all new landfill cells.
[65] Unites States EPA, *Hazardous Waste Management System; Permitting Requirements for Land Disposal Facilities*, 47 Fed. Reg. 32274 (July 26, 1982).
[66] Rowe, R.K.; Sangam, H.P. and Lake, C.B., *Evaluation of an HDPE Geomembrane after 14 Years as a Leachate Lagoon Liner*, Canadian Geotechnical Journal, 40(3): 536-550 (2003), available at https://www.researchgate.net/publication/233524743_Evaluation_of_an_HDPE_geomembrane_after_14_years_as_a_leachate_lagoon_liner.
[67] Landfills developed by the Roman Empire 2,000 years ago are still producing leachate. *See also* G. Fred Lee & Associates, *Flawed Technology of Subtitle D Landfilling of Municipal Solid Waste*, 6 (updated January 2015).
[68] 40 C.F.R. § 264.117.
[69] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 8.
[70] *Id.*

impacts of contamination of groundwater.[71] Bourne's own report indicates that the groundwater surrounding the facility has been contaminated:

> The nature of the groundwater contamination at the Facility is nitrates, volatile organic compounds and heavy metals. Historically, eight compounds (arsenic, cadmium, lead, benzene, 1,2-dichloroethane, 1,4-dichlorobenzene, naphthalene and vinyl chloride) have been detected in groundwater samples at concentrations exceeding the GW-1 standards. Historically, four compounds (iron, manganese, total dissolved solids, and chloride) have been detected in groundwater samples at concentrations exceeding Secondary Maximum Contaminant Levels (SMCL). Sodium has been detected at concentrations exceeding the Massachusetts Drinking Water Guideline.[72]

Additionally, Phase 9 of the expansion will be constructed above portions of the Landfill that will receive an intermediate cover system instead of a permanent cover system.[73] These areas will remain uncovered for several years before the Phase 9 filling occurs on them, increasing the likelihood of leakage and soil and groundwater contamination. Further, the Town intends to utilize the existing 22+ year old leachate collection system to manage leachate from Phase 9 – expected to operate until 2040, and, indeed well into the distant future. The integrity and adequacy of the existing aging leachate collection system is questionable, as is the system's ability to manage these wastes adequately. Therefore, Bourne must provide the Operations and Management plan, including inspection, maintenance and cleaning of the leachate system, and a detailed assessment of its adequacy to manage Phase 9 leachate well into the 21st century.

As discussed above, all landfill liners eventually leak and release dangerous contaminants into the environment. In fact, the Bourne Landfill is already polluting groundwater. For this reason, we oppose the Landfill's expansion. Additionally, Bourne's SSEIR is inadequate and the expansion should undergo a full MEPA review, starting with the submission of an ENF, DEIR and FEIR.

C. The Landfill Expansion Is a Threat to Water Resources

Bourne's SSEIR inadequately describes local water resources, groundwater/surface water interactions, groundwater flow regimes, and water quality.

1. Groundwater Impacts

As noted above, according to Bourne's CSA, fifty-one monitoring wells have been installed on-site and off-site to monitor the Facility and determine the vertical and horizontal extent of the impacts of contamination of groundwater.[74] However, Figure 8 of the SSEIR

[71] CSA, Pages 5-6.
[72] *Id.*
[73] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 5.
[74] CSA, Pages 5-6.

illustrates only 28 groundwater monitoring wells, and the SSEIR bases its understanding of the groundwater flow direction at the Facility on a single set of water level data that pre-date the operation of the Facility (1998) and that are taken from a fraction (11) of the reported 51 available monitoring wells at the Facility and surrounding area. Furthermore, the SSEIR does not discuss the existing water quality impacts to groundwater at the Facility by nitrates, volatile organic compounds, and heavy metals, despite the fact that they were documented in Bourne's 2017 Final CSA.[75]

The SSEIR provides mention of rudimentary hydrogeological parameters such as horizontal hydraulic gradient and hydraulic conductivity, obtained from "numerous previous studies" but makes no effort to append these studies or provide documentation of the data derived from them.[76] It is unclear if the stated average hydraulic conductivity value of 258 ft/day is derived from recent data, or if the 1998 dataset is the basis of the statement.

The SSEIR's brief discussion of vertical hydraulic gradient is similarly rudimentary and sheds no insight into the hydrogeologic regime, the current facilities' impact on groundwater quality or flow patterns, or the impact of the proposed expansion on the groundwater system. Furthermore, according to the SSEIR:

> Vertical hydraulic gradients measured at well couplets change depending upon the season, the amount of precipitation and site runoff controls and for the most part are minimal in relation to horizontal groundwater flow.[77]

In nearly all hydrogeologic settings, hydraulic gradients are impacted by seasonal water table variation, and vertical hydraulic gradients are generally several orders of magnitude lower than horizontal gradients. The SSEIR mentions vertical hydraulic gradients being impacted by site runoff controls but does not expound upon how, when, and why site runoff impacts vertical hydraulic gradients, nor upon whether data indicate regular reversals of vertical gradients (from positive to negative) either seasonally, or as the result of other phenomena. In a landfill application, particularly where unlined cells are present, understanding the stability of the vertical hydraulic gradients is particularly crucial; if historical evidence reveals routine reversals of vertical hydraulic gradient at the site, an understanding of the dynamics involved and potential impacts of these reversals is key to predicting long-term impacts from operation and expansion of the landfill. The SSEIR does not include, or refer to, any specific data supporting its commentary on vertical hydraulic gradients at the site, or the impact that changing vertical and horizontal gradients at the site may have on groundwater flow patterns.

Further, Section 5.4 of the SSEIR states:

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[75] *Id.*
[76] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 31.
[77] *Id.*

> Groundwater monitoring at ISWM is of paramount importance and the Town has worked extensively with the DEP, CCC and the BOH to ensure that a comprehensive monitoring system is in place which will continue to be reviewed and updated as necessary. DEP and CCC have concluded that, while there have been impacts to groundwater from the old unlined landfill which ceased operation in 1999, the Town has taken the appropriate measures to protect downgradient receptors of the facility and that the modern design of the landfill is protective of human health and the environment and therefore, expansions have been granted over the last twenty years.[78]

Despite the Town's statement of the critical importance of groundwater monitoring, the discussion of the groundwater flow regime in the SSEIR is cursory; virtually no raw data is provided to support Bourne's statements on groundwater flow direction, hydraulic, or vertical conductivity parameters. Furthermore, the raw data on groundwater flow direction is taken from 11 of the purported 51 monitoring wells identified in the CSA, and the data from which Figure 13 is developed dates to 1998 – prior to the operation of the Landfill. According to the SSEIR:

> This round of groundwater measurements, (1998) which used eleven monitoring wells, is the most conclusive map of groundwater flow at the site because there were a number of measuring points within the footprint of the Landfill that were subsequently and properly abandoned and are now beneath the Landfill. This round of water level is not only the most precise measurements available for groundwater flow, but also represents the maximum groundwater levels recorded to date for the site.[79]

This statement is inconsistent with the information provided in the 2017 CSA and fails to provide a comprehensive and up-to-date conceptual model of the site's hydrogeologic regime, which is critical to understanding the impact caused by the operations to-date, and to identify and mitigate any potential future impacts to groundwater quality, quantity, or flow direction from the proposed expansion. In order to come to any conclusions as to the potential impacts from the expansion, Bourne must submit a new ENF, DEIR, and FEIR that includes this information. The submission must be supported by a comprehensive dataset of water quality and groundwater flow maps, with data from several different dates, prior to and during current site activities, as well as a predictive model of impacts from the expansion.

[78] *Id.* at 84.
[79] *Id.*

2. Surface Water Resources

The SSEIR addresses surface water resources proximal to the Facility in a similarly cursory manner. Groundwater-surface water interactions are not addressed whatsoever in the SSEIR.

The report discusses a number of surface water bodies in the vicinity of the Facility but does not describe their role in the hydrogeologic regime. A number of apparent kettle ponds abut the Facility: Donnelly and Little Halfway Ponds to the immediate east, Deep Bottom Pond to the northeast, Great Pond to the north, and Mill Pond and Clay Ponds to the east and southeast.[80] Inlet and outlet streams to these ponds are not depicted on the USGS topographic map, indicating these are kettle ponds, consistent with outwash plain hydrology. As kettle ponds, these waterbodies are expressions of groundwater at the surface; yet the SSEIR makes no attempt to integrate these resources into a holistic understanding of the hydrogeologic regime in the immediate site vicinity.

Indeed, the SSEIR's description of the groundwater/surface water regime is so rudimentary it engenders little confidence. The Facility is located within the sole-source Cape Cod sand and gravel outwash deposit, approximately 5 miles from the former Otis Air Force Base (now Joint Base Cape Cod), one of the most studied aquifer systems in New England, if not in the entire United States; the SSEIR fails to even include current USGS or MassDEP surficial and hydrogeologic maps of the locale.

In order for a robust assessment of the impacts of the current and proposed operations on the groundwater system to be completed with confidence, MEPA must require Bourne to submit an ENF, DEIR, and FEIR. These submissions must include a comprehensive review of *all* site and regional hydrogeologic data, including USGS, Massachusetts and Air Force-sourced local and regional hydrogeologic data, along with a conceptual site model, supporting existing analytical and/or numerical models. The Town has failed to submit this information and for this reason we oppose the Landfill expansion.

D. The Landfill Expansion is a Threat to Air Quality and Accelerates Climate Change

1. Landfill Gas is a Threat to Human Health

As Bourne acknowledges in its SSEIR, Phases 7, 8, and 9 will result in the emission of Landfill Gas,[81] including methane and carbon dioxide.[82] Landfill gas is a serious public safety and health concern because it is flammable, includes toxic gases, migrates through soil, accumulates in confined spaces, causes very strong odors, and leads to asthma and other serious

[80] *Id.* 31-34.
[81] Landfill gas is produced by anaerobic bacteria that consume organic matter in Municipal solid waste and is comprised of methane (55%), carbon dioxide (45%), and small amounts of oxygen, nitrogen, and other dangerous gases, including volatile organic compounds and hydrogen sulfide
[82] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 16.

health problems.[83] Methane in particular is a potent greenhouse gas that also contributes to smog, aggravates asthma, and can cause permanent lung damage and other serious health effects.[84]

MSW landfills are the third-largest source of human-related methane emissions in the United States, accounting for approximately 15.1 percent of these emissions in 2018.[85] Although the Bourne Landfill accepts primarily ash waste, it also accepts up to 30,000 tons per year of MSW. To mitigate the dangerous effects of landfill gas generated at the Facility, Bourne uses a gas collection system and flare for thermal destruction.[86] However, these measures are not sufficient to prevent the emission of toxic landfill gases. Methane and other dangerous constituents of landfill gas *always* escape the landfill, even if utility flares are utilized or there is a gas-to-energy system.

Further, and despite Bourne's claim that they capture 95 percent of all gas generated at the Landfill, it is impossible to accurately determine how much methane is produced by a landfill or what percentage of it is ultimately captured in a flare or landfill to energy system. According to Kerry Kelly, Senior Director of Federal Affairs for Waste Management, "it's simply not possible to accurately assess methane leakage. You can measure how much gas you're collecting. You can't measure how much gas the landfill actually generates."[87] In fact, estimates by USEPA and scientists outside of the waste industry run from 10 to 90 percent gas capture over the life of the landfill – a large margin for error.

Bourne's proposed landfill expansion will inevitably increase methane emissions because the larger the landfill, and the more waste it accepts (particularly organics, which make up more than half of MSW), the more methane it will produce and release into the environment.

To reduce methane emissions and eliminate the need for the landfill expansion, Bourne should reduce the number of methane-generating materials going into the Landfill by diverting organic waste. For example, the Town should continue to work with MassDEP to eliminate all food, yard waste, textiles, cardboard, and paper from this facility.[88] Bourne could also generate methane safely, with minimal environmental releases, through the low-heat anaerobic digestion of organic materials or biogas-to-energy, as suggested in its SSEIR.[89] These actions would drastically reduce the amount of methane produced at the Bourne Landfill and also extend its existing capacity, thereby eliminating the need for the proposed expansion.

Relevantly, Bourne relies on a report from 2003 to assert that the proposed Facility will not constitute a danger to the public health, safety, or the environment from anticipated emissions.[90] The Town made this determination using data that is *17 years old* and no longer

[83] Erica Gies, *Landfills Have a Huge Greenhouse Gas Problem. Here's What We Can Do About It*, ENSIA, (October 26, 2016), available at https://ensia.com/features/methane-landfills/.
[84] *Id.*
[85] United States Environmental Protection Agency, *Basic Information About Landfill Gas*, available at https://www.epa.gov/lmop/basic-information-about-landfill-gas.
[86] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 2.
[87] Erica Gies, *Landfills Have a Huge Greenhouse Gas Problem. Here's What We Can Do About It*, ENSIA, (October 26, 2016), available at https://ensia.com/features/methane-landfills/.
[88] These materials should also not be burned at SEMASS, but rather similarly diverted.
[89] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 22.
[90] *Id.* at 53.

relevant. Therefore, in addition to the above stated actions, Bourne should be required to conduct new research and provide current data that demonstrates the Project's air quality impacts in a new ENF, DEIR, and FEIR.

2. Landfill Gas is a Threat to the Environment

Landfill gas also contributes significantly to climate change and is a serious threat to our environment. In fact, landfills are the fourth largest contributors to climate change.[91] A study released in February 2016 indicates that, because of climate change, sea levels along the Massachusetts coastline and other areas of New England are expected to continue rising and that sea level rise in our region will outpace other parts of the world.[92] The study found that while the global sea level rose by about 5.4 inches between 1900 and 2000, the water rose 9.3 inches in Revere, MA. Throughout New England and beyond, coastal management agencies and public officials are working diligently to identify and minimize environmental and public health risks associated with facilities and infrastructure that could be negatively impacted by climate change and sea level rise. Efforts to mitigate emissions and protect public health, the environment, and coastal infrastructure from impacts of climate change are also well underway across Cape Cod. The proposed expansion of the Bourne Landfill is completely out of step with these efforts.

As discussed above, landfill gas is a threat to human health and the environment. Bourne must be required to submit an ENF, DEIR, and FEIR that provides current and accurate information regarding the Landfill's impact on air quality. Bourne has failed to provide this information in its SSEIR, and for this reason, we oppose the Landfill's expansion.

E. Development of Phases 7, 8, and 9 Will Involve the Expansion of Impervious Area Beyond What was Discussed in the Original FEIR and Exceeds the Ten-Acre Threshold

The development of Phases 7, 8, and 9 will involve the expansion of impervious area beyond what was discussed in the original FEIR.[93] The expansion of new impervious area on the 25-acre parcel will be for the landfill expansion and consists of approximately 10.28 acres.[94] The expansion of new impervious area on the 12-acre parcel consists of approximately 5.58 acres for pavement, buildings, and infrastructure to support the LHF.[95] The total new impervious area is 15.86 acres and exceeds the ten-acre threshold. Therefore, pursuant to 11.03(1)(a), Bourne is required to submit a new ENF and draft and final EIR and the SSEIR is insufficient.

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[91] *How Do Landfills Contribute to Global Warming?*, Greentumble (August 23, 2016), available at https://greentumble.com/how-do-landfills-contribute-to-global-warming/.
[92] Matt Rocheleau, *The sea levels are rising fast – and even faster in Massachusetts*, The Boston Globe, (February 25, 2016), available at https://www.bostonglobe.com/metro/2016/02/25/sea-level-rise-here-was-quicker-century-than-elsewhere-and-that-bodes-ill-for-future/t7XOCWqGsnW1kPKH84W5BJ/story.html.
[93] *Id.*
[94] *Id.*
[95] *Id.*

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IV. The Proposed Expansion Does Not Meet Site Suitability Criteria

A. The Landfill Expansion Will Have an Adverse Impact on a Species of Special Concern

The entire 12-acre parcel and portions of the 25-acre parcel are located within mapped habitat of the Eastern Box Turtle, which is state-listed as a species of Special Concern.[96] This species and its habitat are protected pursuant to the Massachusetts Endangered Species Act (MESA; MGL c.131A) and its implementing regulations (321 CMR 10.00).[97]

The landfill expansion is anticipated to result in a taking of Eastern Box Turtle habitat and will require a Conservation and Management Permit (CMP) pursuant to 321 CMR 10.23.[98] In order for the Project to qualify for a CMP, Bourne must demonstrate that the Project has "avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species."[99]

Bourne has not sufficiently demonstrated that the Project meets these performance standards. Although the Town is working with the Natural Heritage and Endangered Species Program (NHESP) to submit a CMP that will address the affected areas, this plan is only in its conceptual stages.[100] Bourne has identified land for potential mitigation but has not definitively determined that this land is suitable, nor has it purchased this land or placed it under permanent protection.[101] Therefore, Bourne's request for the Phase 7, 8, and 9 expansion should be denied unless and until the Town demonstrates that it has met the required performance standards through the submission of a new ENF, DEIR, and FEIR.

B. The Proposed Expansion Includes Agricultural Land Determined to be of Statewide Importance

Pursuant to 310 CMR 16.40(4)(a), "no site shall be determined to be suitable or be assigned as a solid waste management facility where the land is classified as Prime, Unique, or of State and Local Importance by the United States Department of Agriculture, Natural Resources Conservation Service."

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[96] *Certificate of the Secretary of Energy and Environmental Affairs on the Expanded Notice of Project Change*, April 24, 2020, Page 6.
[97] *Id.*
[98] *Id.*
[99] *Id.*
[100] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 13.
[101] *Id.*

The United States Department of Agriculture prepared a custom soil resource report for Bourne and determined that parts of the 12 and 25-acre landfill parcels are classified as farmland of statewide importance.[102] Specifically, the report included a soil map that identified the western portion of the 12-acre parcel and the 25-acre parcel, as well as the state-owned abutting land along the western boundary, to be "Soil Group 431B, Barnstable sandy loam, 3 to 8 percent slopes, very stony and 431C, Barnstable sandy loam, 8 to 15 percent slopes, very stony with a Farmlands Classification of Farmland of statewide importance."[103]

The Town questions whether this classification is accurate.[104] However, Bourne does not provide any information to demonstrate that these parcels do not qualify as farmland of statewide importance. Until Bourne does so, through the submission of a new ENF, DEIR, and FEIR, this land is not suitable for assignment as a solid waste management facility. For this reason, we oppose the Landfill expansion.

C. The Proposed Expansion Includes Land Identified as a Natural Area by the Cape Cod Commission

The Cape Cod Commission (CCC) has identified the 12-acre parcel as a Natural Area as mapped by the CCC's RPP Data Viewer.[105] The CCC defines Natural Areas as "the region's least developed and most sensitive areas. These identified areas comprise natural shoreline, barrier beaches, banks, and dunes, areas with highest habitat value and natural landscapes, undeveloped lands in wellhead protection areas, buffers to wetlands and vernal pools, and undeveloped areas subject to flooding."[106] The vision for these areas is to:

> Minimize adverse development impacts to sensitive resource areas, to preserve lands that define Cape Cod's natural landscape and contribute to its scenic character, and to improve the Cape's resilience to severe storms and the effects of climate change. ***Natural Areas are lands with the highest significance for resource protection or conservation and are appropriate for permanent protection through acquisition and conservation restriction or for transfer of development rights to less vulnerable areas.***

The Landfill expansion is grossly inconsistent with the CCC's goal of preserving this sensitive land as a Natural Area. In fact, the Town has stated that it is likely to seek a waiver

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[102] Town of Bourne, *Single Supplemental Environmental Impact Report*, November 2020, Page 46.
[103] *Id.*
[104] *Id.* at 47.
[105] *Id.* at 83. CCC's RPP Data Viewer available at https://cccommission.maps.arcgis.com/apps/MapSeries/index.html?appid=efa7276c967f48658c6190d53196ba1d.
[106] *Cape Cod Regional Policy Plan*, 77 (February 22, 2019), available at https://www.capecodcommission.org/resource-library/file/?url=/dept/commission/team/rpp/rpp_final/Cape_Cod_Regional_Policy_Plan_Effective%2002-22-2019.pdf.

from the RPP's requirement of off-site mitigation for the taking of this Natural Area.[107] Such action is completely out of step with the CCC's determination that this land should be permanently protected and not further developed. For these reasons, we oppose the Landfill expansion.

V. Conclusion

Thank you for the opportunity to provide these comments. For the reasons discussed above, the signatories oppose the Phase 7, 8, and 9 Landfill expansion, and respectfully request that Bourne's expansion request be denied, and that the Town undergo a full and rigorous MEPA review, starting with the submission of and Environmental Notification Form, and Draft and Final Environmental Impact Reports.

Respectfully submitted,

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[107] *Id.*

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EXHIBIT 1

Annual Solid Waste Facility Reports: Landfill Summary

Calendar Year 2015

Sorted by Municipality

17-Jan-2017

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2015

ADAMS | WE | SPECIALTY MINERALS COMBINED NOTCH RD LF | *Receipt Status:* **Rec'd 3/22/2016**

Reg Obj Acct: 343090 | NOTCH RD | *Class:* LF

Accepted: 38,930 | 38,930 | Check: **OK** | Cover/Accept 0.321 | Cover: 12,500

Waste/Material Type	State	Tons
Other (NonMSW)	MA	38,930

Cover Type	Tons
Soil/Sand	12,500

Days Open: 365 Leachate (gal): 0 Leach Treatment/Disposal:

AGAWAM | WE | BONDIS ISLAND ASH LANDFILL | *Receipt Status:* **Rec'd 3/14/2016**

Reg Obj Acct: 173282 | M STREET EXT | *Class:* LF

Accepted: 53,150 | 53,150 | Check: **OK** | Cover/Accept 0.455 | Cover: 24,159

Waste/Material Type	State	Tons
Ash	CT	12,698
Ash	MA	40,452

Cover Type	Tons
Bottom Ash	21,169
Street Sweepings	2,990

Days Open: 312 Leachate (gal): 11,084,915 Leach Treatment/Disposal: Sewer

---

BARRE | CE | BARRE LANDFILL | *Receipt Status:* **Rec'd 2/15/2016**

Reg Obj Acct: 259260 | 99 BARRE DEPOT RD | *Class:* LF

Accepted: 16,586 | 16,586 | Check: **OK** | Cover/Accept 5.593 | Cover: 92,758

Waste/Material Type	State	Tons
MSW	MA	16,196
Sludge (WWTP)	MA	390

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	5,165
Contaminated Soil	87,593

Days Open: 250 Leachate (gal): 5,117,398 Leach Treatment/Disposal: Truck off-site

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BOURNE | SE | BOURNE LANDFILL | *Receipt Status:* **Rec'd 3/14/2016**

Reg Obj Acct: 172356 | 201 MACARTHUR BLVD | *Class:* LF

Accepted: 215,963 | 215,963 | Check: **OK** | Cover/Accept 0.292 | Cover: 63,162

Waste/Material Type	State	Tons
C&D Waste	MA	5,685
Ash	MA	181,715
Other (NonMSW)	MA	853
Bypass (MSW)	MA	26,391
Bypass (MSW)	RI	1,319

Cover Type	Tons
Bottom Ash	44,206
Contaminated Soil	16,973
Soil/Sand	213
Street Sweepings	1,770

Days Open: 354 Leachate (gal): 11,882,792 Leach Treatment/Disposal: Truck off-site

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CARVER | SE | CARVER MARION WAREHAM ASH LANDFILL | *Receipt Status:* **Rec'd 3/9/2016**

Reg Obj Acct: 172399 | 118 FEDERAL ST | *Class:* LF

Accepted: 75,110 | 75,110 | Check: **OK** | Cover/Accept 0.322 | Cover: 24,174

Waste/Material Type	State	Tons
MSW	MA	50,446
Ash	MA	13,475
Recycling Residue	MA	4,207
Bulky Waste	MA	6,982

Cover Type	Tons
Bottom Ash	18,105
C&D Fines	6,069

Days Open: 339 Leachate (gal): 11,751,466 Leach Treatment/Disposal: Truck off-site

Municipality *Region* *Reg Obj Name and Address* Reg Obj Name reflects the most recent data and may not reflect 2015

CHICOPEE WE CHICOPEE LANDFILL *Receipt Status:* **Rec'd 2/9/2016**
Reg Obj Acct: 291515 161 NEW LOMBARD RD *Class:* LF

Accepted: 235,942 Check: **Problem** Cover/Accept Cover: 190,491

Waste/Material Type	State	Tons
MSW	CT	42,193
MSW	MA	183,578
MSW	VT	235
DPW Waste	CT	546
DPW Waste	MA	2,949
Other (NonMSW)	CT	2,191
Other (NonMSW)	MA	4,250

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	31,548
Bottom Ash	4,374
Contaminated Soil	127,813
Foundry Sand	4,634
Sludge Ash	7,892
Soil/Sand	2,253
Street Sweepings	4,421
WTP Fines	7,556

Days Open: 278 Leachate (gal): 12,944,800 Leach Treatment/Disposal: Sewer

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DARTMOUTH SE CRAPO HILL LANDFILL *Receipt Status:* **Rec'd 2/24/2016**
Reg Obj Acct: 172448 300 SAMUEL BARNET BLVD *Class:* LF

Accepted: 106,831 106,831 Check: **OK** Cover/Accept 0.748 Cover: 79,891

Waste/Material Type	State	Tons
MSW	MA	96,329
Sludge (WWTP)	MA	584
Sludge (WTP)	MA	16
DPW Waste	MA	9,902

Cover Type	Tons
C&D Fines	12,683
Soil/Sand	52,140
Street Sweepings	11,502
Tire Chips	300
TriPak (Emulsion Mix)	919
Wood Chips	2,347

Days Open: 287 Leachate (gal): 8,550,482 Leach Treatment/Disposal: Sewer

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FALL RIVER SE ALLIED SERVICES OF MASSACHUSETTS *Receipt Status:* **Rec'd 2/5/2016**
Reg Obj Acct: 172513 1080 AIRPORT RD *Class:* LF

Accepted: 0 Check: **Problem** Cover/Accept ###### Cover: 47,220

Cover Type	Tons
Soil/Sand	31,800
TriPak (Emulsion Mix)	15,420

Days Open: 0 Leachate (gal): 51,379,730 Leach Treatment/Disposal: Sewer

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HAVERHILL NE WARD HILL NECK LANDFILL *Receipt Status:* **Rec'd 2/26/2016**
Reg Obj Acct: 173281 100 RECOVERY WAY *Class:* LF

Accepted: 145,250 145,250 Check: **OK** Cover/Accept 0.014 Cover: 2,080

Waste/Material Type	State	Tons
Ash	MA	145,250

Cover Type	Tons
Posi-shell	2,080

Days Open: 255 Leachate (gal): 11,942,890 Leach Treatment/Disposal: Sewer&OffSite

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HULL SE HULL LANDFILL *Receipt Status:* **Rec'd 3/3/2016**
Reg Obj Acct: 172619 LOGAN AVE *Class:* LF

Accepted: 460 460 Check: **OK** Cover/Accept 1.5 Cover: 690

Waste/Material Type	State	Tons
MSW	MA	260
DPW Waste	MA	200

Cover Type	Tons
Soil/Sand	90
Street Sweepings	600

Days Open: 144 Leachate (gal): 200,000 Leach Treatment/Disposal: Sewer

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2015

MIDDLEBOROUGH | SE | ANGEL VIEW PET CEMETERY | *Receipt Status:* **Rec'd 2/15/2016**
Reg Obj Acct: 274537 | 465 WAREHAM ST | *Class:* SMLF

Accepted: | 180 | Check: **Problem** | Cover/Accept | Cover: 1

Waste/Material Type	State	Tons
Ash	MA	180

Cover Type	Tons
Soil/Sand	1

Days Open: 256 Leachate (gal): 0 Leach Treatment/Disposal: On Site

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MIDDLEBOROUGH | SE | MIDDLEBOROUGH LANDFILL | *Receipt Status:* **Rec'd 2/15/2016**
Reg Obj Acct: 172728 | 207 PLYMPTON ST | *Class:* LF

Accepted: 54,080 | 54,080 | Check: **OK** | Cover/Accept | Cover: 23,151

Waste/Material Type	State	Tons
MSW	MA	39,804
Sludge (WWTP)	MA	5,162
Ash	MA	166
Recycling Residue	MA	6,921
Other (NonMSW)	MA	2,027

0.428

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	10,064
Contaminated Soil	12,509
Other	236
Street Sweepings	342

Days Open: 260 Leachate (gal): 4,569,859 Leach Treatment/Disposal: Truck off-site

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NANTUCKET | SE | NANTUCKET LANDFILL | *Receipt Status:* **Rec'd 2/15/2016**
Reg Obj Acct: 172753 | 188 MADAKET RD | *Class:* LF

Accepted: | 2,700 | Check: **Problem** | Cover/Accept | Cover: 75

Waste/Material Type	State	Tons
Other (NonMSW)	MA	2,700

Cover Type	Tons
Other	75

Days Open: 355 Leachate (gal): 0 Leach Treatment/Disposal: Truck off-site

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PEABODY | NE | PEABODY ASH MONOFILL | *Receipt Status:* **Rec'd 3/9/2016**
Reg Obj Acct: 266442 | 0 FARM AVE | *Class:* LF

Accepted: 0 | | Check: **Problem** | Cover/Accept | Cover:

Days Open: 0 Leachate (gal): 3,905,497 Leach Treatment/Disposal: Sewer

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SAUGUS | NE | WHEELABRATOR SAUGUS INC ASH LANDFILL | *Receipt Status:* **Rec'd 2/12/2016**
Reg Obj Acct: 172913 | 100 SALEM TPKE | *Class:* LF

Accepted: 123,769 | 123,769 | Check: **OK** | Cover/Accept | Cover: 9,908

Waste/Material Type	State	Tons
Ash	MA	123,769

0.08

Cover Type	Tons
Contaminated Soil	8,388
Soil/Sand	1,520

Days Open: 365 Leachate (gal): 43,198,943 Leach Treatment/Disposal: OnSite&Sewer

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SHREWSBURY | CE | SHREWSBURY LANDFILL | *Receipt Status:* **Rec'd 1/12/2016**
Reg Obj Acct: 172931 | 620 HARTFORD TPKE | *Class:* LF

Accepted: 303,784 | 303,784 | Check: **OK** | Cover/Accept | Cover: 17,132

Waste/Material Type	State	Tons
Sludge (WWTP)	MA	100
Ash	MA	252,991
Ash	NH	48,579
Other (NonMSW)	MA	57
Other (NonMSW)	NH	2,057

0.056

Cover Type	Tons
LANLOC	15,535
Street Sweepings	1,597

Days Open: 309 Leachate (gal): 12,423,212 Leach Treatment/Disposal: Sewer

Municipality	*Region*	*Reg Obj Name and Address*	Reg Obj Name reflects the most recent data and may not reflect 2015

SOMERSET SE BRAYTON POINT ENERGY LLC *Receipt Status:* **Rec'd 2/5/2016**
Reg Obj Acct: 407198 1 BRAYTON POINT RD *Class:* LF

Accepted: 1,300 1,300 Check: **OK** Cover/Accept Cover: 1

Waste/Material Type	State	Tons
Sludge (WWTP)	MA	1,300

0.001

Cover Type	Tons
Other	1

Days Open: 12 Leachate (gal): 2,000,000 Leach Treatment/Disposal: On Site

SOUTHBRIDGE CE SOUTHBRIDGE LANDFILL *Receipt Status:* **Rec'd 2/11/2016**
Reg Obj Acct: 172947 165 BAREFOOT RD *Class:* LF

Accepted: 404,059 404,059 Check: **OK** Cover/Accept Cover: 150,427

Waste/Material Type	State	Tons
MSW	CT	36,475
MSW	MA	325,113
Residuals C&D	MA	42,471

0.372

Cover Type	Tons
Contaminated Soil	82,545
Road Base	41,318
Sludge Ash	6,127
Street Sweepings	20,225
WWTP Grit	212

Days Open: 261 Leachate (gal): 6,376,340 Leach Treatment/Disposal: Truck off-site

STURBRIDGE CE STURBRIDGE LANDFILL *Receipt Status:* **Rec'd 2/10/2016**
Reg Obj Acct: 172975 154 BREAKNECK RD *Class:* LF

Accepted: 275 275 Check: **OK** Cover/Accept Cover: 7,720

Waste/Material Type	State	Tons
MSW	MA	275

######

Cover Type	Tons
Soil/Sand	7,600
Street Sweepings	120

Days Open: 156 Leachate (gal): 1,351,000 Leach Treatment/Disposal: Truck off-site

TAUNTON SE TAUNTON LANDFILL *Receipt Status:* **Rec'd 2/15/2016**
Reg Obj Acct: 172994 340 EAST BRITANNIA ST *Class:* LF

Accepted: 112,481 112,481 Check: **OK** Cover/Accept Cover: 45,859

Waste/Material Type	State	Tons
MSW	MA	101,658
Sludge (WWTP)	MA	7,750
Other (NonMSW)	MA	3,073

0.408

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	16,572
Contaminated Soil	23,184
Other	3,982
Soil/Sand	575
Street Sweepings	1,546

Days Open: 312 Leachate (gal): 16,896,483 Leach Treatment/Disposal: Sewer

WESTMINSTER CE FITCHBURG WESTMINSTER LANDFILL *Receipt Status:* **Rec'd 2/15/2016**
Reg Obj Acct: 39885 101 FITCHBURG RD *Class:* LF

Accepted: 343,809 343,809 Check: **OK** Cover/Accept Cover: 71,669

Waste/Material Type	State	Tons
MSW	MA	227,908
MSW	RI	90,195
Sludge (WWTP)	MA	10,392
Contaminated Soil	MA	7
DPW Waste	MA	945
DPW Waste	NH	9
Special/Supplemental	CT	347
Special/Supplemental	MA	14,006

0.208

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	22,819
C&D Fines	1,126
C&D Residuals	1,094
Compost	2,600
Contaminated Soil	38,002
Dredge (fresh)	219
Foundry Sand	4,518
Street Sweepings	510
WWTP Grit	781

Days Open: 302 Leachate (gal): 17,312,680 Leach Treatment/Disposal: Sewer

Report Summary

Number of Annual Reports Listed: 21

Annual Solid Waste Facility Reports: Landfill Summary

Calendar Year 2016

Sorted by Municipality

06-Aug-2019

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2016

ADAMS | WE | SPECIALTY MINERALS COMBINED NOTCH RD LF | *Receipt Status:* **Rec'd 2/14/2017**

Reg Obj Acct: 343090 | NOTCH RD | *Class:* LF

Accepted: 60,390 | 60,390 | Check: **OK** | Cover/Accept 0.207 | Cover: 12,500

Waste/Material Type	State	Tons
Other (NonMSW)	MA	60,390

Cover Type	Tons
Soil/Sand	12,500

Days Open: 365 Leachate (gal): 0 Leach Treatment/Disposal:

AGAWAM | WE | BONDIS ISLAND ASH LANDFILL | *Receipt Status:* **Rec'd 2/25/2017**

Reg Obj Acct: 173282 | M STREET EXT | *Class:* LF

Accepted: 103,796 | 103,796 | Check: **OK** | Cover/Accept 0.22 | Cover: 22,797

Waste/Material Type	State	Tons
Ash	CT	59,397
Ash	MA	44,399

Cover Type	Tons
Bottom Ash	20,675
Street Sweepings	2,122

Days Open: 280 Leachate (gal): 9,335,632 Leach Treatment/Disposal: Sewer

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BARRE | CE | BARRE LANDFILL | *Receipt Status:* **Rec'd 2/14/2017**

Reg Obj Acct: 259260 | 99 BARRE DEPOT RD | *Class:* LF

Accepted: | | Check: **Problem** | Cover/Accept | Cover: 32,334

Cover Type	Tons
Contaminated Soil	32,334

Days Open: 0 Leachate (gal): 4,680,011 Leach Treatment/Disposal: Sewer

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BOURNE | SE | BOURNE LANDFILL | *Receipt Status:* **Rec'd 2/13/2017**

Reg Obj Acct: 172356 | 201 MACARTHUR BLVD | *Class:* LF

Accepted: 215,838 | 215,838 | Check: **OK** | Cover/Accept 0.271 | Cover: 58,518

Waste/Material Type	State	Tons
MSW	MA	20,465
C&D Waste	MA	5,544
Sludge (WTP)	MA	1,002
Ash	MA	188,821
Other (NonMSW)	MA	6

Cover Type	Tons
Bottom Ash	43,803
Contaminated Soil	13,032
Street Sweepings	1,683

Days Open: 353 Leachate (gal): 10,932,618 Leach Treatment/Disposal: Truck off-site

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CARVER | SE | CARVER MARION WAREHAM ASH LANDFILL | *Receipt Status:* **Rec'd 3/3/2017**

Reg Obj Acct: 172399 | 118 FEDERAL ST | *Class:* LF

Accepted: 55,280 | 55,280 | Check: **OK** | Cover/Accept 0.322 | Cover: 17,795

Waste/Material Type	State	Tons
MSW	MA	35,728
Ash	MA	7,267
Recycling Residue	MA	7,900
Other (NonMSW)	MA	4,385

Cover Type	Tons
Bottom Ash	13,399
C&D Fines	4,396

Days Open: 322 Leachate (gal): 8,647,351 Leach Treatment/Disposal: Truck off-site

Municipality	*Region*	*Reg Obj Name and Address*	Reg Obj Name reflects the most recent data and may not reflect 2016

CHICOPEE — WE — CHICOPEE LANDFILL — *Receipt Status:* **Rec'd 2/9/2017**
Reg Obj Acct: 291515 — 161 NEW LOMBARD RD — *Class:* LF

Accepted: 209,850 | 209,850 Check: **OK** Cover/Accept 0.862 Cover: 180,799

Waste/Material Type	State	Tons
MSW	CT	16,770
MSW	MA	182,772
MSW	VT	616
Ash	CT	107
DPW Waste	CT	679
DPW Waste	MA	3,110
Other (NonMSW)	CT	2,950
Other (NonMSW)	MA	2,846

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	22,273
Contaminated Soil	135,193
Foundry Sand	2,757
Paper Fibers	11,644
Sludge Ash	7,456
Street Sweepings	1,476

Days Open: 269 Leachate (gal): 10,524,100 Leach Treatment/Disposal: Sewer

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DARTMOUTH — SE — CRAPO HILL LANDFILL — *Receipt Status:* **Rec'd 2/9/2017**
Reg Obj Acct: 172448 — 300 SAMUEL BARNET BLVD — *Class:* LF

Accepted: 102,106 | 102,106 Check: **OK** Cover/Accept 0.78 Cover: 79,640

Waste/Material Type	State	Tons
MSW	MA	91,922
Sludge (WTP)	MA	17
DPW Waste	MA	9,562
Other (NonMSW)	MA	605

Cover Type	Tons
Bottom Ash	4,952
Other	34,700
Soil/Sand	25,524
Street Sweepings	11,568
Wood Chips	2,896

Days Open: 287 Leachate (gal): 9,325,951 Leach Treatment/Disposal: Sewer

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FALL RIVER — SE — ALLIED SERVICES OF MASSACHUSETTS — *Receipt Status:* **Pending**
Reg Obj Acct: 172513 — 1080 AIRPORT RD — *Class:* LF

Accepted: | Check: Cover/Accept Cover:

Days Open: Leachate (gal): Leach Treatment/Disposal:

HAVERHILL — NE — WARD HILL NECK LANDFILL — *Receipt Status:* **Rec'd 2/9/2017**
Reg Obj Acct: 173281 — 100 RECOVERY WAY — *Class:* LF

Accepted: 133,708 | 133,708 Check: **OK** Cover/Accept 0.08 Cover: 10,697

Waste/Material Type	State	Tons
Ash	MA	133,708

Cover Type	Tons
Contaminated Soil	7,692
Posi-shell	60
Soil/Sand	2,945

Days Open: 310 Leachate (gal): 9,553,225 Leach Treatment/Disposal: Sewer&OffSite

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HULL — SE — HULL LANDFILL — *Receipt Status:* **Rec'd 6/14/2017**
Reg Obj Acct: 172619 — LOGAN AVE — *Class:* LF

Accepted: 441 | 441 Check: **OK** Cover/Accept 1.272 Cover: 561

Waste/Material Type	State	Tons
MSW	MA	240
DPW Waste	MA	201

Cover Type	Tons
Street Sweepings	561

Days Open: 144 Leachate (gal): 200,000 Leach Treatment/Disposal: Sewer

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Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2016

MIDDLEBOROUGH | SE | ANGEL VIEW PET CEMETERY | *Receipt Status:* **Rec'd 2/14/2017**
Reg Obj Acct: 274537 | 471 WAREHAM ST | *Class:* SMLF

Accepted: 180 | 180 | Check: **OK** | Cover/Accept | Cover:

Waste/Material Type	State	Tons
Ash	MA	76
Other (NonMSW)	MA	104

Days Open: 256 | Leachate (gal): | Leach Treatment/Disposal:

MIDDLEBOROUGH | SE | MIDDLEBOROUGH LANDFILL | *Receipt Status:* **Rec'd 3/10/2017**
Reg Obj Acct: 172728 | 207 PLYMPTON ST | *Class:* LF

Accepted: 58,040 | 58,040 | Check: **OK** | Cover/Accept | Cover: 19,970

Waste/Material Type	State	Tons
MSW	MA	52,639
Sludge (WWTP)	MA	3,771
Recycling Residue	MA	64
Other (NonMSW)	MA	1,566

0.344

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	1,227
Contaminated Soil	9,906
Other	8,724
Street Sweepings	113

Days Open: 308 | Leachate (gal): 4,287,530 | Leach Treatment/Disposal: Truck off-site

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NANTUCKET | SE | NANTUCKET LANDFILL | *Receipt Status:* **Rec'd 2/7/2017**
Reg Obj Acct: 172753 | 188 MADAKET RD | *Class:* LF

Accepted: 2,800 | 2,800 | Check: **OK** | Cover/Accept | Cover: 75

Waste/Material Type	State	Tons
Other (NonMSW)	MA	2,800

0.027

Cover Type	Tons
Posi-shell	75

Days Open: 355 | Leachate (gal): 0 | Leach Treatment/Disposal: Truck off-site

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PEABODY | NE | PEABODY ASH MONOFILL | *Receipt Status:* **Rec'd 2/25/2017**
Reg Obj Acct: 266442 | 0 FARM AVE | *Class:* LF

Accepted: 0 | | Check: **Problem** | Cover/Accept | Cover:

Days Open: 0 | Leachate (gal): 4,579,414 | Leach Treatment/Disposal: Sewer

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SAUGUS | NE | WHEELABRATOR SAUGUS INC ASH LANDFILL | *Receipt Status:* **Rec'd 2/10/2017**
Reg Obj Acct: 172913 | 100 SALEM TPKE | *Class:* LF

Accepted: 113,511 | 113,511 | Check: **OK** | Cover/Accept | Cover: 26,236

Waste/Material Type	State	Tons
Ash	MA	113,511

0.231

Cover Type	Tons
Contaminated Soil	22,154
Dredge (marine)	1,209
Soil/Sand	2,873

Days Open: 365 | Leachate (gal): 52,291,179 | Leach Treatment/Disposal: OnSite&Sewer

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SHREWSBURY | CE | SHREWSBURY LANDFILL | *Receipt Status:* **Rec'd 2/10/2017**
Reg Obj Acct: 172931 | 620 HARTFORD TPKE | *Class:* LF

Accepted: 369,485 | 369,485 | Check: **OK** | Cover/Accept | Cover: 17,474

Waste/Material Type	State	Tons
Sludge (WWTP)	MA	147
Ash	CT	9,347
Ash	MA	233,611
Ash	NH	54,932
Ash	NY	56,403
Other (NonMSW)	MA	14,043
Other (NonMSW)	NH	1,002

0.047

Cover Type	Tons
Street Sweepings	1,338
TriPak (Emulsion Mix)	16,136

Days Open: 309 | Leachate (gal): 15,317,596 | Leach Treatment/Disposal: Sewer

Municipality	*Region*	*Reg Obj Name and Address*	Reg Obj Name reflects the most recent data and may not reflect 2016

SOMERSET SE BRAYTON POINT LLC *Receipt Status:* **Rec'd 1/26/2017**
Reg Obj Acct: 407198 1 BRAYTON POINT RD *Class:* LF

Accepted: 0 Check: **Problem** Cover/Accept Cover:

Days Open: 0 Leachate (gal): 2 Leach Treatment/Disposal: On Site

SOUTHBRIDGE CE SOUTHBRIDGE LANDFILL *Receipt Status:* **Rec'd 2/14/2017**
Reg Obj Acct: 172947 165 BAREFOOT RD *Class:* LF

Accepted: 325,889 325,889 Check: **OK** Cover/Accept 0.171 Cover: 55,776

Waste/Material Type	State	Tons
MSW	CT	4,567
MSW	MA	257,302
Residuals C&D	MA	64,020

Cover Type	Tons
Bottom Ash	2,008
Contaminated Soil	9,181
Road Base	30,263
Street Sweepings	14,073
WWTP Grit	251

Days Open: 240 Leachate (gal): 4,215,907 Leach Treatment/Disposal: Truck off-site

STURBRIDGE CE STURBRIDGE LANDFILL *Receipt Status:* **Rec'd 11/15/2017**
Reg Obj Acct: 172975 154 BREAKNECK RD *Class:* LF

Accepted: 275 275 Check: **OK** Cover/Accept ###### Cover: 7,720

Waste/Material Type	State	Tons
MSW	MA	275

Cover Type	Tons
Soil/Sand	7,600
Street Sweepings	120

Days Open: 156 Leachate (gal): 2,793,000 Leach Treatment/Disposal: Truck off-site

TAUNTON SE TAUNTON LANDFILL *Receipt Status:* **Rec'd 3/13/2017**
Reg Obj Acct: 172994 340 EAST BRITANNIA ST *Class:* LF

Accepted: 119.072 119.072 Check: **OK** Cover/Accept 0.689 Cover: 81,993

Waste/Material Type	State	Tons
MSW	MA	110,013
MSW	RI	73
Sludge (WWTP)	MA	8,080
Other (NonMSW)	MA	906

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	23,627
Contaminated Soil	54,165
Other	2,743
Soil/Sand	1,458

Days Open: 309 Leachate (gal): 13,124,345 Leach Treatment/Disposal: Sewer

WESTMINSTER CE FITCHBURG WESTMINSTER LANDFILL *Receipt Status:* **Rec'd 2/14/2017**
Reg Obj Acct: 39885 101 FITCHBURG RD *Class:* LF

Accepted: 417,465 Check: **Problem** Cover/Accept Cover: 115,547

Waste/Material Type	State	Tons
MSW	MA	238,761
MSW	RI	148,794
C&D Waste	MA	10
Sludge (WWTP)	MA	9,573
DPW Waste	MA	2,059
Other (NonMSW)	MA	699
Special/Supplemental	CT	348
Special/Supplemental	MA	17,221

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	35,943
Contaminated Soil	78,039
Street Sweepings	1,565

Days Open: 309 Leachate (gal): 20,531,382 Leach Treatment/Disposal: Sewer

Report Summary

Number of Annual Reports Listed: 21

Annual Solid Waste Facility Reports: Landfill Summary

Calendar Year 2017

Sorted by Municipality

23-May-2019

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2017

ADAMS | WE | SPECIALTY MINERALS COMBINED NOTCH RD LF | *Receipt Status:* **Rec'd 2/13/2018**

Reg Obj Acct: 343090 | NOTCH RD | *Class:* LF

Accepted: 54,942 | | Check: **Problem** | Cover/Accept 0.025 | Cover: 1,400

Cover Type	Tons
Soil/Sand	1,400

Days Open: 365 Leachate (gal): 0 Leach Treatment/Disposal:

AGAWAM | WE | BONDIS ISLAND ASH LANDFILL | *Receipt Status:* **Rec'd 2/23/2018**

Reg Obj Acct: 173282 | M STREET EXT | *Class:* LF

Accepted: 102,923 | 102,923 | Check: **OK** | Cover/Accept 0.31 | Cover: 31,916

Waste/Material Type	State	Tons
Sludge (WWTP)	MA	3,463
Ash	CT	54,063
Ash	MA	44,800
Recycling Residue	MA	597

Cover Type	Tons
Bottom Ash	17,945
Contaminated Soil	11,742
Street Sweepings	2,229

Days Open: 281 Leachate (gal): 11,324,645 Leach Treatment/Disposal: Sewer

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BOURNE | SE | BOURNE LANDFILL | *Receipt Status:* **Rec'd 2/8/2018**

Reg Obj Acct: 172356 | 201 MACARTHUR BLVD | *Class:* LF

Accepted: 218,861 | 218,861 | Check: **OK** | Cover/Accept 0.297 | Cover: 65,028

Waste/Material Type	State	Tons
MSW	MA	23,405
C&D Waste	MA	5,390
Ash	MA	188,993
Other (NonMSW)	MA	1,073

Cover Type	Tons
Bottom Ash	43,796
Contaminated Soil	19,760
Soil/Sand	14
Street Sweepings	1,458

Days Open: 356 Leachate (gal): 14,768,241 Leach Treatment/Disposal: Truck off-site

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CARVER | SE | CARVER MARION WAREHAM ASH LANDFILL | *Receipt Status:* **Rec'd 2/23/2018**

Reg Obj Acct: 172399 | 118 FEDERAL ST | *Class:* LF

Accepted: 29,756 | 29,756 | Check: **OK** | Cover/Accept 0.518 | Cover: 15,415

Waste/Material Type	State	Tons
MSW	MA	16,715
Ash	MA	5,273
Recycling Residue	MA	7,517
Bulky Waste	MA	251

Cover Type	Tons
Bottom Ash	14,418
C&D Fines	997

Days Open: 253 Leachate (gal): 9,633,209 Leach Treatment/Disposal: Truck off-site

Municipality *Region* *Reg Obj Name and Address* Reg Obj Name reflects the most recent data and may not reflect 2017

CHICOPEE WE CHICOPEE LANDFILL *Receipt Status:* **Rec'd 2/12/2018**
Reg Obj Acct: 291515 161 NEW LOMBARD RD *Class:* LF

Accepted: 235,285 235,285 Check: **OK** Cover/Accept 0.688 Cover: 161,993

Waste/Material Type	State	Tons
MSW	CT	45,500
MSW	MA	178,135
MSW	VT	558
Ash	CT	212
DPW Waste	CT	352
DPW Waste	MA	3,044
Other (NonMSW)	CT	4,846
Other (NonMSW)	MA	2,638

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	27,774
Contaminated Soil	111,693
Foundry Sand	4,386
Sludge Ash	9,780
Street Sweepings	3,803
WWTP Grit	4,557

Days Open: 268 Leachate (gal): 9,564,700 Leach Treatment/Disposal: Sewer

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DARTMOUTH SE CRAPO HILL LANDFILL *Receipt Status:* **Rec'd 2/14/2018**
Reg Obj Acct: 172448 300 SAMUEL BARNET BLVD *Class:* LF

Accepted: 106,633 106,633 Check: **OK** Cover/Accept 0.423 Cover: 45,089

Waste/Material Type	State	Tons
MSW	MA	102,191
Sludge (WTP)	MA	3
DPW Waste	MA	3,931
Other (NonMSW)	MA	508

Cover Type	Tons
Bottom Ash	594
Other	269
Soil/Sand	19,591
Street Sweepings	20,145
Wood Chips	4,490

Days Open: 287 Leachate (gal): 7,792,955 Leach Treatment/Disposal: Sewer

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FALL RIVER SE ALLIED SERVICES OF MASSACHUSETTS *Receipt Status:* **Pending**
Reg Obj Acct: 172513 1080 AIRPORT RD *Class:* LF

Accepted: Check: Cover/Accept Cover:

Days Open: Leachate (gal): Leach Treatment/Disposal:

HAVERHILL NE WARD HILL NECK LANDFILL *Receipt Status:* **Rec'd 2/22/2018**
Reg Obj Acct: 173281 100 RECOVERY WAY *Class:* LF

Accepted: 138,674 138,674 Check: **OK** Cover/Accept 0.185 Cover: 25,648

Waste/Material Type	State	Tons
Ash	MA	138,674

Cover Type	Tons
Contaminated Soil	25,648

Days Open: 310 Leachate (gal): 14,245,767 Leach Treatment/Disposal: On Site

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HULL SE HULL LANDFILL *Receipt Status:* **Rec'd 2/8/2018**
Reg Obj Acct: 172619 LOGAN AVE *Class:* LF

Accepted: 461 461 Check: **OK** Cover/Accept 1.258 Cover: 580

Waste/Material Type	State	Tons
MSW	MA	240
DPW Waste	MA	221

Cover Type	Tons
Street Sweepings	580

Days Open: 144 Leachate (gal): 390,000 Leach Treatment/Disposal: Sewer

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MIDDLEBOROUGH SE ANGEL VIEW PET CEMETERY *Receipt Status:* **Rec'd 5/18/2018**
Reg Obj Acct: 274537 471 WAREHAM ST *Class:* SMLF

Accepted: 83 83 Check: **OK** Cover/Accept 0.181 Cover: 15

Waste/Material Type	State	Tons
Ash	MA	76
Other (NonMSW)	MA	7

Cover Type	Tons
Other	15

Days Open: 256 Leachate (gal): 0 Leach Treatment/Disposal:

Municipality *Region* *Reg Obj Name and Address* Reg Obj Name reflects the most recent data and may not reflect 2017

MIDDLEBOROUGH SE MIDDLEBOROUGH LANDFILL *Receipt Status:* **Rec'd 3/12/2018**
Reg Obj Acct: 172728 207 PLYMPTON ST *Class:* LF

Accepted: 55,106 55,106 Check: **OK** Cover/Accept 0.532 Cover: 29,328

Waste/Material Type	State	Tons
MSW	MA	49,602
Sludge (WWTP)	MA	3,837
Other (NonMSW)	MA	1,667

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	20,600
Contaminated Soil	377
Other	5,419
Soil/Sand	1,997
Street Sweepings	935

Days Open: 305 Leachate (gal): 7,212,835 Leach Treatment/Disposal: Truck off-site

NANTUCKET SE NANTUCKET LANDFILL *Receipt Status:* **Rec'd 2/13/2018**
Reg Obj Acct: 172753 188 MADAKET RD *Class:* LF

Accepted: 2,720 2,720 Check: **OK** Cover/Accept 0.368 Cover: 1,000

Waste/Material Type	State	Tons
MSW	MA	1,088
Other (NonMSW)	MA	1,632

Cover Type	Tons
Soil/Sand	1,000

Days Open: 355 Leachate (gal): 632,636 Leach Treatment/Disposal: Truck off-site

PEABODY NE PEABODY ASH MONOFILL *Receipt Status:* **Rec'd 2/23/2018**
Reg Obj Acct: 266442 0 FARM AVE *Class:* LF

Accepted: 0 Check: **Problem** Cover/Accept Cover:

Days Open: 0 Leachate (gal): 6,166,948 Leach Treatment/Disposal: Sewer

SAUGUS NE WHEELABRATOR SAUGUS INC ASH LANDFILL *Receipt Status:* **Rec'd 2/14/2018**
Reg Obj Acct: 172913 100 SALEM TPKE *Class:* LF

Accepted: 116,261 116,261 Check: **OK** Cover/Accept 0.134 Cover: 15,559

Waste/Material Type	State	Tons
Ash	MA	116,261

Cover Type	Tons
Dredge (marine)	964
Soil/Sand	14,595

Days Open: 365 Leachate (gal): 50,365,674 Leach Treatment/Disposal: On Site

SHREWSBURY CE SHREWSBURY LANDFILL *Receipt Status:* **Rec'd 2/14/2018**
Reg Obj Acct: 172931 620 HARTFORD TPKE *Class:* LF

Accepted: 417,081 417,081 Check: **OK** Cover/Accept 0.054 Cover: 22,653

Waste/Material Type	State	Tons
Sludge (WWTP)	MA	87
Ash	CT	45,948
Ash	MA	231,642
Ash	NH	53,486
Ash	NY	49,533
Other (NonMSW)	MA	33,312
Other (NonMSW)	NH	3,073

Cover Type	Tons
Other	21,194
Street Sweepings	1,459

Days Open: 312 Leachate (gal): 19,790,886 Leach Treatment/Disposal: Sewer

SOMERSET SE BRAYTON POINT LLC *Receipt Status:* **Rec'd 1/11/2018**
Reg Obj Acct: 407198 1 BRAYTON POINT RD *Class:* LF

Accepted: 0 Check: **Problem** Cover/Accept Cover:

Days Open: 0 Leachate (gal): 2,000,000 Leach Treatment/Disposal: On Site

Municipality	*Region*	*Reg Obj Name and Address*	Reg Obj Name reflects the most recent data and may not reflect 2017

SOUTHBRIDGE — CE — SOUTHBRIDGE LANDFILL — *Receipt Status:* **Rec'd 1/30/2018**
Reg Obj Acct: 172947 — 165 BAREFOOT RD — *Class:* LF

Accepted: 257,425 | 257,425 Check: **OK** Cover/Accept 0.247 Cover: 63,521

Waste/Material Type	State	Tons
MSW	CT	5,532
MSW	MA	188,622
Residuals C&D	MA	63,271

Cover Type	Tons
Contaminated Soil	32,776
Road Base	20,554
Street Sweepings	9,920
WWTP Grit	271

Days Open: 241 Leachate (gal): 5,430,693 Leach Treatment/Disposal: Truck off-site

STURBRIDGE — CE — STURBRIDGE LANDFILL — *Receipt Status:* **Pending**
Reg Obj Acct: 172975 — 154 BREAKNECK RD — *Class:* LF

Accepted: | Check: Cover/Accept | Cover:

Days Open: Leachate (gal): Leach Treatment/Disposal:

TAUNTON — SE — TAUNTON LANDFILL — *Receipt Status:* **Rec'd 3/12/2018**
Reg Obj Acct: 172994 — 340 EAST BRITANNIA ST — *Class:* LF

Accepted: 119,681 | 119,681 Check: **OK** Cover/Accept 0.982 Cover: 117,534

Waste/Material Type	State	Tons
MSW	MA	106,849
MSW	RI	41
Sludge (WWTP)	MA	8,695
Sludge (WTP)	MA	306
Sludge (WTP)	RI	16
Recycling Residue	MA	453
Special/Supplemental	MA	3,250
Shingles Asphalt	MA	71

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	39,471
Contaminated Soil	22,410
Cullet (crushed glass)	9,690
Other	42,500
Soil/Sand	2,548
Street Sweepings	915

Days Open: 305 Leachate (gal): 13,745,249 Leach Treatment/Disposal: Sewer&OffSite

WESTMINSTER — CE — FITCHBURG WESTMINSTER LANDFILL — *Receipt Status:* **Rec'd 2/14/2018**
Reg Obj Acct: 39885 — 101 FITCHBURG RD — *Class:* LF

Accepted: 445,024 | 445,024 Check: **OK** Cover/Accept 0.326 Cover: 145,000

Waste/Material Type	State	Tons
MSW	MA	266,717
MSW	RI	143,155
Sludge (WWTP)	MA	9,905
Other (NonMSW)	CT	310
Other (NonMSW)	MA	24,937

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	48,520
C&D Residuals	4,430
Compost	4,057
Contaminated Soil	75,063
Foundry Sand	2,185
Paper Sludge	7,165
Street Sweepings	768
WWTP Grit	2,812

Days Open: 304 Leachate (gal): 29,312,781 Leach Treatment/Disposal: Sewer

Report Summary

Number of Annual Reports Listed: 20

Annual Solid Waste Facility Reports: Landfill Summary

Calendar Year 2018

Sorted by Municipality

01-Dec-2020

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2018

ADAMS | WE | SPECIALTY MINERALS COMBINED NOTCH RD LF | *Receipt Status:* **Rec'd 2/14/2019**

Reg Obj Acct: 343090 | NOTCH RD | *Class:* LF

Accepted: 90,000 | 90,000 | Check: **OK** | Cover/Accept 0.172 | Cover: 15,500

Waste/Material Type	State	Tons
Other (NonMSW)	MA	90,000

Cover Type	Tons
Soil/Sand	15,500

Days Open: 365 Leachate (gal): 0 Leach Treatment/Disposal:

AGAWAM | WE | BONDIS ISLAND ASH LANDFILL | *Receipt Status:* **Rec'd 3/14/2019**

Reg Obj Acct: 173282 | M STREET EXT | *Class:* LF

Accepted: 104,223 | 104,223 | Check: **OK** | Cover/Accept 0.162 | Cover: 16,885

Waste/Material Type	State	Tons
Ash	CT	55,873
Ash	MA	42,753
Recycling Residue	MA	1,347
Compostables/Organics	MA	4,250

Cover Type	Tons
Bottom Ash	14,511
Street Sweepings	2,374

Days Open: 280 Leachate (gal): 15,081,508 Leach Treatment/Disposal: Sewer

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BOURNE | SE | BOURNE LANDFILL | *Receipt Status:* **Rec'd 3/13/2019**

Reg Obj Acct: 172356 | 201 MACARTHUR BLVD | *Class:* LF

Accepted: 211,948 | 211,948 | Check: **OK** | Cover/Accept 0.345 | Cover: 73,167

Waste/Material Type	State	Tons
MSW	MA	28,645
C&D Waste	MA	2,428
Sludge (WTP)	MA	978
Ash	MA	179,892
Other (NonMSW)	MA	5

Cover Type	Tons
Bottom Ash	43,796
Contaminated Soil	28,055
Street Sweepings	1,217
TriPak (Emulsion Mix)	99

Days Open: 355 Leachate (gal): 15,234,177 Leach Treatment/Disposal: Truck off-site

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CARVER | SE | CARVER MARION WAREHAM ASH LANDFILL | *Receipt Status:* **Rec'd 3/14/2019**

Reg Obj Acct: 172399 | 118 FEDERAL ST | *Class:* LF

Accepted: 104,310 | 104,310 | Check: **OK** | Cover/Accept 0.302 | Cover: 31,473

Waste/Material Type	State	Tons
MSW	MA	86,888
Ash	MA	5,983
Recycling Residue	MA	8,294
Bulky Waste	MA	3,145

Cover Type	Tons
Bottom Ash	19,305
C&D Fines	12,168

Days Open: 317 Leachate (gal): 14,387,873 Leach Treatment/Disposal: Truck off-site

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2018

CHICOPEE | WE | CHICOPEE LANDFILL | *Receipt Status:* **Rec'd 2/7/2019**
Reg Obj Acct: 291515 | 161 NEW LOMBARD RD | *Class:* LF

Accepted: 133,523 | 133,523 | Check: **OK** | Cover/Accept 1.121 | Cover: 149,643

Waste/Material Type	State	Tons
MSW	CT	13,003
MSW	MA	108,913
MSW	VT	167
DPW Waste	CT	315
DPW Waste	MA	3,150
Special/Supplemental	CT	5,226
Special/Supplemental	MA	2,749

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	25,636
Contaminated Soil	104,846
Foundry Sand	5,289
Sludge Ash	11,974
Street Sweepings	1,624
WWTP Grit	274

Days Open: 266 | Leachate (gal): 10,594,536 | Leach Treatment/Disposal: Sewer

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DARTMOUTH | SE | CRAPO HILL LANDFILL | *Receipt Status:* **Rec'd 2/8/2019**
Reg Obj Acct: 172448 | 300 SAMUEL BARNET BLVD | *Class:* LF

Accepted: 105,587 | 105,587 | Check: **OK** | Cover/Accept 0.422 | Cover: 44,526

Waste/Material Type	State	Tons
MSW	MA	101,950
Sludge (WTP)	MA	4
DPW Waste	MA	3,103
Other (NonMSW)	MA	530

Cover Type	Tons
Bottom Ash	623
Other	858
Soil/Sand	16,838
Street Sweepings	20,137
Wood Chips	6,070

Days Open: 287 | Leachate (gal): 8,150,060 | Leach Treatment/Disposal: Sewer

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FALL RIVER | SE | ALLIED SERVICES OF MASSACHUSETTS | *Receipt Status:* **Pending**
Reg Obj Acct: 172513 | 1080 AIRPORT RD | *Class:* LF

Accepted: | | Check: | Cover/Accept | Cover:

Days Open: | Leachate (gal): | Leach Treatment/Disposal:

HAVERHILL | NE | WARD HILL NECK LANDFILL | *Receipt Status:* **Rec'd 3/14/2019**
Reg Obj Acct: 173281 | 100 RECOVERY WAY | *Class:* LF

Accepted: 150,570 | 150,570 | Check: **OK** | Cover/Accept 0.213 | Cover: 32,136

Waste/Material Type	State	Tons
MSW	MA	3,923
Ash	MA	146,647

Cover Type	Tons
Contaminated Soil	32,136

Days Open: 260 | Leachate (gal): 10,926,770 | Leach Treatment/Disposal: OnSite&Sewer

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HULL | SE | HULL LANDFILL | *Receipt Status:* **Rec'd 2/15/2019**
Reg Obj Acct: 172619 | LOGAN AVE | *Class:* LF

Accepted: 461 | 461 | Check: **OK** | Cover/Accept 1.258 | Cover: 580

Waste/Material Type	State	Tons
MSW	MA	240
DPW Waste	MA	221

Cover Type	Tons
Street Sweepings	580

Days Open: 144 | Leachate (gal): 390,000 | Leach Treatment/Disposal: Sewer

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MIDDLEBORO | SE | FINAL GIFT USA LLC | *Receipt Status:* **Rec'd 3/15/2019**
Reg Obj Acct: 274537 | 471 WAREHAM ST | *Class:* SMLF

Accepted: 83 | 83 | Check: **OK** | Cover/Accept | Cover:

Waste/Material Type	State	Tons
Ash	MA	83

Days Open: 306 | Leachate (gal): 0 | Leach Treatment/Disposal:

Municipality | *Region* | *Reg Obj Name and Address* | Reg Obj Name reflects the most recent data and may not reflect 2018

MIDDLEBORO | SE | MIDDLEBOROUGH LANDFILL | *Receipt Status:* **Rec'd 2/15/2019**
Reg Obj Acct: 172728 | 207 PLYMPTON ST | *Class:* LF

Accepted: 58,279 | 58,279 | Check: **OK** | Cover/Accept: 0.425 | Cover: 24,776

Waste/Material Type	State	Tons
MSW	MA	46,497
Sludge (WWTP)	MA	3,587
Recycling Residue	MA	1,081
DPW Waste	MA	433
Other (NonMSW)	MA	1,218
Special/Supplemental	MA	5,463

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	12,236
Contaminated Soil	8,411
Other	2,880
Soil/Sand	1,059
Street Sweepings	190

Days Open: 304 | Leachate (gal): 10,150,206 | Leach Treatment/Disposal: Truck off-site

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MIDDLEBOROUGH | SE | FINAL GIFT USA LLC | *Receipt Status:* **Rec'd 3/15/2019**
Reg Obj Acct: 274537 | 471 WAREHAM ST | *Class:* SMLF

Accepted: 83 | 83 | Check: **OK** | Cover/Accept: | Cover:

Waste/Material Type	State	Tons
Ash	MA	83

Days Open: 306 | Leachate (gal): 0 | Leach Treatment/Disposal:

MIDDLEBOROUGH | SE | MIDDLEBOROUGH LANDFILL | *Receipt Status:* **Rec'd 2/15/2019**
Reg Obj Acct: 172728 | 207 PLYMPTON ST | *Class:* LF

Accepted: 58,279 | 58,279 | Check: **OK** | Cover/Accept: 0.425 | Cover: 24,776

Waste/Material Type	State	Tons
MSW	MA	46,497
Sludge (WWTP)	MA	3,587
Recycling Residue	MA	1,081
DPW Waste	MA	433
Other (NonMSW)	MA	1,218
Special/Supplemental	MA	5,463

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	12,236
Contaminated Soil	8,411
Other	2,880
Soil/Sand	1,059
Street Sweepings	190

Days Open: 304 | Leachate (gal): 10,150,206 | Leach Treatment/Disposal: Truck off-site

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NANTUCKET | SE | NANTUCKET LANDFILL | *Receipt Status:* **Rec'd 2/18/2019**
Reg Obj Acct: 172753 | 188 MADAKET RD | *Class:* LF

Accepted: 2,800 | 2,800 | Check: **OK** | Cover/Accept: 0.357 | Cover: 1,000

Waste/Material Type	State	Tons
MSW	MA	2,800

Cover Type	Tons
Soil/Sand	1,000

Days Open: 355 | Leachate (gal): 432,531 | Leach Treatment/Disposal: Truck off-site

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PEABODY | NE | PEABODY ASH MONOFILL | *Receipt Status:* **Rec'd 3/14/2019**
Reg Obj Acct: 266442 | 0 FARM AVE | *Class:* LF

Accepted: 0 | | Check: **Problem** | Cover/Accept: | Cover:

Days Open: 0 | Leachate (gal): 11,360,821 | Leach Treatment/Disposal: Sewer

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SAUGUS | NE | WHEELABRATOR SAUGUS INC ASH LANDFILL | *Receipt Status:* **Rec'd 2/26/2019**
Reg Obj Acct: 172913 | 100 SALEM TPKE | *Class:* LF

Accepted: 91,606 | 91,606 | Check: **OK** | Cover/Accept: 0.355 | Cover: 32,482

Waste/Material Type	State	Tons
Ash	MA	91,606

Cover Type	Tons
Contaminated Soil	26,229
Soil/Sand	6,253

Days Open: 365 | Leachate (gal): 56,601,613 | Leach Treatment/Disposal: On Site

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Municipality *Region* *Reg Obj Name and Address* Reg Obj Name reflects the most recent data and may not reflect 2018

SHREWSBURY CE SHREWSBURY LANDFILL *Receipt Status:* **Rec'd 2/15/2019**
Reg Obj Acct: 172931 620 HARTFORD TPKE *Class:* LF

Accepted: 376,090 376,090 Check: **OK** Cover/Accept 0.022 Cover: 8,192

Waste/Material Type	State	Tons
Sludge (WWTP)	MA	92
Ash	CT	24,893
Ash	MA	250,129
Ash	NH	52,219
Ash	NY	47,183
Other (NonMSW)	MA	71
Other (NonMSW)	NH	1,503

Cover Type	Tons
Contaminated Soil	438
Dredge (marine)	8
Other	5,515
Street Sweepings	2,231

Days Open: 312 Leachate (gal): 19,556,055 Leach Treatment/Disposal: Sewer

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SOMERSET SE BRAYTON POINT LLC *Receipt Status:* **Pending**
Reg Obj Acct: 407198 1 BRAYTON POINT RD *Class:* LF

Accepted: Check: Cover/Accept Cover:

Days Open: Leachate (gal): Leach Treatment/Disposal:

SOUTHBRIDGE CE SOUTHBRIDGE LANDFILL *Receipt Status:* **Rec'd 2/13/2019**
Reg Obj Acct: 172947 165 BAREFOOT RD *Class:* LF

Accepted: 261,957 261,957 Check: **OK** Cover/Accept 0.183 Cover: 47,831

Waste/Material Type	State	Tons
MSW	CT	27,108
MSW	MA	199,396
Recycling Residue	MA	35,453

Cover Type	Tons
Contaminated Soil	22,408
Road Base	10,539
Street Sweepings	14,845
WWTP Grit	39

Days Open: 224 Leachate (gal): 7,607,956 Leach Treatment/Disposal: Truck off-site

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STURBRIDGE CE STURBRIDGE LANDFILL *Receipt Status:* **Pending**
Reg Obj Acct: 172975 154 BREAKNECK RD *Class:* LF

Accepted: Check: Cover/Accept Cover:

Days Open: Leachate (gal): Leach Treatment/Disposal:

TAUNTON SE TAUNTON LANDFILL *Receipt Status:* **Rec'd 2/15/2019**
Reg Obj Acct: 172994 340 EAST BRITANNIA ST *Class:* LF

Accepted: 123,410 123,410 Check: **OK** Cover/Accept 0.481 Cover: 59,337

Waste/Material Type	State	Tons
MSW	MA	103,476
MSW	RI	173
Sludge (WWTP)	MA	8,958
Recycling Residue	MA	3,432
DPW Waste	MA	819
DPW Waste	RI	26
Special/Supplemental	MA	6,426
Special/Supplemental	NH	11
Special/Supplemental	RI	6
Shingles Asphalt	MA	83

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	8,595
Contaminated Soil	45,830
Cullet (crushed glass)	2,575
Soil/Sand	2,215
Street Sweepings	122

Days Open: 304 Leachate (gal): 19,342,816 Leach Treatment/Disposal: Sewer

Municipality	*Region*	*Reg Obj Name and Address*	Reg Obj Name reflects the most recent data and may not reflect 2018
WESTMINSTER	CE	FITCHBURG WESTMINSTER LANDFILL	*Receipt Status:* **Rec'd 2/13/2019**
Reg Obj Acct: 39885		101 FITCHBURG RD	*Class:* LF

Accepted: 441,505 441,505 Check: **OK** Cover/Accept 0.307 Cover: 135,586

Waste/Material Type	State	Tons
MSW	MA	277,834
MSW	RI	137,472
MSW	VT	574
Sludge (WWTP)	MA	9,597
Other (NonMSW)	MA	998
Special/Supplemental	MA	15,030

Cover Type	Tons
Auto Shredder Residue/Auto Fluff	55,709
C&D Residuals	1,804
Compost	6,358
Contaminated Soil	55,712
Paper Sludge	4,226
Sludge Ash	11,366
Street Sweepings	411

Days Open: 305 Leachate (gal): 36,366,278 Leach Treatment/Disposal: Sewer

Report Summary

Number of Annual Reports Listed: 22

Annual Solid Waste Facility Reports: Handling Facility Summary

Calendar Year 2019

Sorted by Municipality & Regulated Object Name

01-Dec-2020

Municipality | *Region* | *Reg Obj Name and Address*

ACTON | CE | ACTON TRANSFER STATION | *Receipt Status:* **Pending**

Reg Obj Acct: 173143 | 14 FOREST RD | *Class:* LGTRAN - Large Transfer Station

Accepted: | Check Accepted: | OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
Acton Compost Site	Acton	MA		Compostables/Organics
Empire Recycling	Billerica	MA		General Recyclables
Tombarello & Sons	Lawrence	MA		Metals

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Wheelabrator	North Andover	MA		MSW

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

AGAWAM | WE | PIONEER VLY RESOURCE RECOVERY TRANS STAT | *Receipt Status:* **Rec'd 2/12/2020**

Reg Obj Acct: 374839 | 188 M ST | *Class:* LGTRAN - Large Transfer Station

Accepted: 114

Waste/Material Type	State	Tons
MSW	MA	114

114 Check Accepted: **OK** OpenDays: 307

Diverted:

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Bethlehem LF	Bethlehem	NY		MSW
Colebrook Landfill	Colebrook	NH		MSW
Covanta	Pittsfield	MA		MSW
Covanta Haverhill WTE Facility	Haverhill	MA		MSW
COVANTA SECONN	Preston	CT		MSW
Ontario County Landfill	Stanley	NY		MSW
SEMASS	Rochester	MA		MSW
Seneca Meadows LF	Waterloo	NY		MSW
South Hadley LF	South Hadley	MA		MSW

Divert + Dispose = 0 (Divert+Dispose) - Accept: -114 % Difference: -100.00%

Municipality	*Region*	*Reg Obj Name and Address*	
AUBURN	CE	CASELLA AUBURN TRANSFER STATION	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 330392		15 HARDSCRABBLE RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 70,411

Waste/Material Type	State	Tons
MSW	MA	70,167
C&D Waste	MA	244

70,411 Check Accepted: **OK** OpenDays: 261

Diverted: 290

Vendor/End User	Town	State	Tons	Material Type
C&D Tires	Fairhaven	MA	39	Tires
EXCEL	Charlton	MA	138	Metals
Northcoast Services	Portsmouth	NH	37	Electronics/Computers
RE Energy	Lewiston	ME	28	C&D Waste
UMM	Millbury	MA	48	C&D Waste

Disposed: 69,715

Disposal Site Name	Town	State	Tons	Waste Type
Arrowhead Landfill	Perrycounty	AL	237	MSW
clinton county lf	Morrisonville	NY	9,161	MSW
Covanta	Rochester	MA	1,510	MSW
fulton county	Johnston	NY	15,849	MSW
north country landfill	Bethlehem	NH	13,850	MSW
PERC	Orrington	ME	17,732	MSW
Wheelabrator	Millbury	MA	11,376	MSW

Divert + Dispose = 70,005 (Divert+Dispose) - Accept: -406 % Difference: -0.58%

Municipality	*Region*	*Reg Obj Name and Address*	
AYER	CE	DEVENS RECYCLING CENTER	*Receipt Status:* **Rec'd 2/7/2020**
Reg Obj Acct: 429157		45 INDEPENDENCE DR	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 183,928 | 183,928 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
MSW	MA	47,358
C&D Waste	CT	6
C&D Waste	MA	120,033
C&D Waste	ME	1
C&D Waste	NH	8,208
C&D Waste	RI	14
Bulky Waste	MA	8,308

Diverted: 95,974

Vendor/End User	Town	State	Tons	Material Type
CoVANTA	Haverhill	ME	348	MSW
EXCEL	Charlton	MA	1,149	Metals
kennedy recycling	Chelmsford	MA	3,199	Asphalt Brick Concrete
LL & S	Salem	NH	71	Metals
mitrano	Shirley	MA	7	Gypsum
OFFICE PAPER RECOVERY	Wilmington	MA	36	Cardboard
SCHNITZER	Everett	MA	3,706	Metals
Sunny Farms Landfill	Astoria	OH	37,319	C&D Waste
TAFISA	Lac-Megantic	QC	7,571	C&D Waste
Waste management	Rochester	NH	13,770	MSW
Waste management	Fitchburg	MA	1,369	MSW
wheelabrator millbury	North Andover	MA	27,429	MSW

Disposed: 85,205

Disposal Site Name	Town	State	Tons	Waste Type
east coast rail	Lordstown	OH	15,232	Residuals C&D
Sunny Farms Landfill	Fostoria	OH	42,226	Residuals C&D
Sunny Farms Landfill	Fostoria	OH	27,747	C&D Waste

Divert + Dispose = 181,179 (Divert+Dispose) - Accept: -2,749 % Difference: -1.49%

AYER	CE	FBS TIRE RECYCLING INC	*Receipt Status:* **Rec'd 2/12/2020**
Reg Obj Acct: 264949		1 BERKSHIRE BLVD	*Class:* LGHNDL - Large Handling Facility

Accepted: 28,739 | 28,739 | Check Accepted: **OK** | OpenDays: 250

Waste/Material Type	State	Tons
Tires	CT	4,942
Tires	MA	11,589
Tires	NH	4,201
Tires	NY	6,300
Tires	RI	498
Tires	VT	1,209

Diverted: 29,054

Vendor/End User	Town	State	Tons	Material Type
BDS	Norridgewock	ME	15,269	Tires
great lakes metals	Peterburg	PA	570	Metals
multilantas	Hondouras	NA	627	Tires
NB Tire Reduction	New Bedford	MA	88	Tires
ND paper	Rumford	ME	12,329	Tires
SCHNITZER	Worcester	MA	171	Metals

Disposed: 106

Disposal Site Name	Town	State	Tons	Waste Type
WM- Barre Martone LF	Norridgewock	ME	106	Tires

Divert + Dispose = 29,160 (Divert+Dispose) - Accept: 421 % Difference: 1.46%

Municipality	*Region*	*Reg Obj Name and Address*	
BOSTON	NE	HOWARD TRANSFER STATION	*Receipt Status:* **Rec'd 1/25/2020**
Reg Obj Acct: 329121		68 NORFOLK AVE	*Class:* LGTRAN - Large Transfer Station

Accepted: 284,247 | 284,247 | Check Accepted: **OK** | OpenDays: 365

Waste/Material Type	State	Tons
MSW	MA	284,247

Diverted: 133

Vendor/End User	Town	State	Tons	Material Type
casella charlestown	Charlestown	MA	31	Cardboard
j.p. routhier & sons	Ayer	MA	10	Tires
Prolerized NE Co	Everett	MA	2	Metals
RE Energy	Roxbury	MA	17	General Recyclables
RE Energy	Roxbury	MA	27	C&D Waste
Scrap It	Everett	MA	37	Metals
turner metal	Lynn	MA	3	Metals
wm stoughton	Stoughton	MA	6	General Recyclables

Disposed: 284,325

Disposal Site Name	Town	State	Tons	Waste Type
Covanta Haverhill	Haverhill	MA	63,198	MSW
lee country landfill	Bishopville	SC	1,069	MSW
RESCO	Saugus	MA	5,618	MSW
SEMASS	Bourne	MA	64,078	MSW
Turnkey LF	Rochester	NH	149,201	MSW
Wheelabrator	North Andover	MA	1,161	MSW

Divert + Dispose = 284,458 (Divert+Dispose) - Accept: 211 % Difference: 0.07%

BOSTON	NE	JAMES G GRANT CO TRANSFER STATION	*Receipt Status:* **Rec'd 2/6/2020**
Reg Obj Acct: 173213		28 WOLCOTT ST	*Class:* -

Accepted: 15,209 | 15,209 | Check Accepted: **OK** | OpenDays: 300

Waste/Material Type	State	Tons
C&D Waste	MA	14,152
Tires	MA	53
Metals	MA	320
Asphalt Brick Concrete	MA	684

Diverted: 10,254

Vendor/End User	Town	State	Tons	Material Type
BoBbs Tire	New Bedford	MA	16	Tires
Champion City	Brockton	MA	3,538	C&D Waste
DeVENS RECYCLING	Devens	MA	1,415	C&D Waste
grant co.	Boston	MA	320	Metals
jr vinagro corp	Johnston	RI	683	Asphalt Brick Concrete
jr vinagro corp	Johnston	RI	4,245	C&D Waste
N.B. Tire Reduction	New Bedford	MA	37	Tires

Disposed: 4,955

Disposal Site Name	Town	State	Tons	Waste Type
dunn landfill	Rensellaer	NY	4,955	C&D Waste

Divert + Dispose = 15,209 (Divert+Dispose) - Accept: 0 % Difference: 0.00%

Municipality	*Region*	*Reg Obj Name and Address*	
BOSTON	NE	REENERGY ROXBURY LLC	*Receipt Status:* **Rec'd 2/12/2020**
Reg Obj Acct: 173138		101-111 GERARD ST	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 174,948 | 174,948 | Check Accepted: **OK** | OpenDays: 308

Waste/Material Type	State	Tons
C&D Waste	MA	148,649
Bulky Waste	MA	19,401
Cardboard	MA	46
Metals	MA	20
Asphalt Brick Concrete	MA	4,921
Gypsum	MA	76
Wood C&D	MA	1,835

Diverted: 92,689

Vendor/End User	Town	State	Tons	Material Type
AkS Recycling Inc.	Fitchburg	MA	39	Cardboard
C&D Tires	Fairhaven	MA	20	Tires
carney	Raynham	MA	6,772	Asphalt Brick Concrete
Complete Recycling Solutions	Fall River	MA	6	Electronics/Computers
coventry landfil	Coventry	RI	196	Fines C&D
dynamic waste systems	Methuen	MA	23	Cardboard
Gateway Recycling	Salem	NH	2,560	Metals
jr vinagro corp	Johnston	RI	3,957	Asphalt Brick Concrete
LL & S	Salem	NH	1,321	Metals
Miller Recycling Corp	Attleboro	MA	11	Cardboard
northeast packaging	Billerica	MA	135	Cardboard
RE Energy	Lewiston	ME	53,175	Wood C&D
SCHNITZER	Attleboro	MA	23	Metals
Seneca Meadows Landfill	Seneca Meadows	NY	8,196	Fines C&D
Spiegal	Avon	MA	1,666	Metals
TAFISA	Lac-Megantic	QC	8,280	Wood C&D
USA GYPSUM	Denver	PA	92	Gypsum
Waste management	Middleboro	MA	6,195	Residuals C&D
Waste management	Norridgewock	ME	22	Residuals C&D

Disposed: 91,886

Disposal Site Name	Town	State	Tons	Waste Type
CASELLA	Holyoke	MA	91	Residuals C&D
Champion City	Brockton	MA	351	Residuals C&D
ReEnergy	Ware	MA	60,737	Residuals C&D
S A Drum	Rensselaer	NY	27,016	Residuals C&D
Waste Management	Fitchburg	MA	3,691	Residuals C&D

Divert + Dispose = 184,575 (Divert+Dispose) - Accept: 9,627 % Difference: 5.50%

Municipality	*Region*	*Reg Obj Name and Address*	
BOURNE	SE	BOURNE TRANSFER STATION	*Receipt Status:* **Rec'd 2/11/2020**
Reg Obj Acct: 362723		201 MACARTHUR BLVD	*Class:* LGTRAN - Large Transfer Station

Accepted: 26,853 | 26,853 Check Accepted: **OK** | OpenDays: 302

Waste/Material Type	State	Tons
MSW	MA	974
C&D Waste	MA	14,060
C&D Waste	RI	11
Tires	MA	18
General Recyclables	MA	6,359
Compostables/Organics	MA	3,668
Compostables/Organics	ME	1
Textiles/Clothing	MA	28
Metals	MA	1,031
Plastics	MA	1
Asphalt Brick Concrete	MA	478
Household Haz Waste	MA	6
Electronics/Computers	MA	81
Mattresses	MA	137

Diverted: 22,774

Vendor/End User	Town	State	Tons	Material Type
ACE Mattress Recycling	West Warwick	RI	137	Mattresses
BoBbs Tire	New Bedford	MA	18	Tires
Champion City	Brockton	MA	3,231	C&D Waste
crs	Fall River	MA	81	Electronics/Computers
EL Harvey	Westborough	MA	1	Plastics
EL Harvey	Westborough	MA	6,359	General Recyclables
jr vinagro corp	Johnston	RI	7,716	C&D Waste
Mid City Scrap	Everett	MA	1,031	Metals
Middleboro Recycling	Middleboro	MA	6	Household Haz Waste
Raynham Transfer	Raynham	MA	19	C&D Waste
Red Cross	Boston	MA	28	Textiles/Clothing
Town of Bourne	Bourne	MA	478	Asphalt Brick Concrete
Town of Bourne	Bourne	MA	3,669	Compostables/Organics

Disposed: 4,052

Disposal Site Name	Town	State	Tons	Waste Type
Bourne Landfill	Bourne	MA	3,105	Residuals C&D
Bourne Landfill	Bourne	MA	947	MSW

Divert + Dispose = 26,826 (Divert+Dispose) - Accept: -27 % Difference: -0.10%

BRAINTREE	SE	BRAINTREE TRANSFER STATION	*Receipt Status:* **Rec'd 3/13/2020**
Reg Obj Acct: 173139		257 IVORY ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 289,154 | 289,154 Check Accepted: **OK** | OpenDays: 305

Waste/Material Type	State	Tons
MSW	MA	289,146
C&D Waste	MA	8

Diverted: 68

Vendor/End User	Town	State	Tons	Material Type
McConnel Enterprises	Braintree	MA	67	Metals
User Friendly Recycling	Stoughton	MA	1	Electronics/Computers

Disposed: 290,939

Disposal Site Name	Town	State	Tons	Waste Type
Bourne ISWF	Bourne	MA	126	MSW
CMW Landfill	Carver	MA	76,396	MSW
SEMASS	Rochester	MA	214,417	MSW

Divert + Dispose = 291,007 (Divert+Dispose) - Accept: 1,853 % Difference: 0.64%

Municipality	*Region*	*Reg Obj Name and Address*	
BREWSTER	SE	CAPE SAND & RECYCLING WOOD RECLAMATION	*Receipt Status:* **Rec'd 2/13/2020**
Reg Obj Acct: 298388		1515 FREEMANS WAY	*Class:* SMHNDL - Small Handling Facility

Accepted: 24,780 | 24,780 | Check Accepted: **OK** | OpenDays: 324

Waste/Material Type	State	Tons
Wood Waste	MA	10,492
Asphalt Brick Concrete	MA	14,288

Diverted: 37,426

Vendor/End User	Town	State	Tons	Material Type
retail sale	Various	MA	17,000	Loam
retail sale	Various	CN	14,174	Asphalt Brick Concrete
retail sale	Various	MA	6,252	Wood Waste

Disposed:

Divert + Dispose = 37,426 | (Divert+Dispose) - Accept: 12,646 | % Difference: 51.03%

BROCKTON	SE	CHAMPION CITY C&D TRANSFER STATION	*Receipt Status:* **Rec'd 2/5/2020**
Reg Obj Acct: 344386		138 WILDER ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 243,805 | 243,805 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
C&D Waste	MA	25,839
Bulky Waste	MA	79,517
Residuals C&D	MA	138,449

Diverted: 6,759

Vendor/End User	Town	State	Tons	Material Type
East Coast Computer Recycling	Medford	MA	16	Electronics/Computers
F&B Rubberized	New Bedford	MA	51	Tires
MiGHTY FLAME	Rindge	NH	2	Metals
STOUGHTON RECYCLING	Stoughton	MA	5,187	General Recyclables
USA GYPSUM	Denver	PA	22	Gypsum
Various	Various	MA	1,481	Metals

Disposed: 248,004

Disposal Site Name	Town	State	Tons	Waste Type
Sunny Farms Landfill	Fostoria	OH	6,403	Residuals C&D
Sunny Farms Landfill	Fostoria	OH	642	Asphalt Brick Concrete
tunnel Hill reclamation LF	New Lexington	OH	220,160	Residuals C&D
tunnel Hill reclamation LF	New Lexington	OH	20,799	Asphalt Brick Concrete

Divert + Dispose = 254,763 | (Divert+Dispose) - Accept: 10,958 | % Difference: 4.49%

Municipality	*Region*	*Reg Obj Name and Address*	
BROCKTON	SE	TROJAN C&D TRANSFER STATION	*Receipt Status:* **Rec'd 2/11/2020**
Reg Obj Acct: 279564		71 FOREST ST	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 99,511 | 99,511 | Check Accepted: **OK** | OpenDays: 305

Waste/Material Type	State	Tons
C&D Waste	MA	23,000
Other (NonMSW)	MA	281
Bulky Waste	MA	76,134
Asphalt Brick Concrete	MA	96

Diverted: 4,420

Vendor/End User	Town	State	Tons	Material Type
BFI	Brockton	MA	403	Cardboard
BoBbs Tire	Fall River	MA	45	Tires
BRS	Bridgewater	MA	433	Asphalt Brick Concrete
BRS	Bridgewater	MA	394	Wood Waste
carney	Raynham	MA	22	Gypsum
CRTR	Assonet	MA	3	Electronics/Computers
New England Recycling	Taunton	MA	1,063	Wood Waste
Speigel	Brockton	MA	2,057	Metals

Disposed: 95,174

Disposal Site Name	Town	State	Tons	Waste Type
LAFARGE	Lordstown	OH	95,174	Residuals C&D

Divert + Dispose = 99,594 (Divert+Dispose) - Accept: 83 % Difference: 0.08%

BROOKLINE	NE	BROOKLINE TRANSFER STATION	*Receipt Status:* **Rec'd 1/13/2020**
Reg Obj Acct: 173140		815 NEWTON ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 30,711 | 30,711 | Check Accepted: **OK** | OpenDays: 248

Waste/Material Type	State	Tons
MSW	MA	22,983
Wood Waste	MA	470
C&D Waste	MA	2,468
DPW Waste	MA	1,847
Tires	MA	9
Compostables/Organics	MA	2,739
Metals	MA	158
Electronics/Computers	MA	37

Diverted: 6,116

Vendor/End User	Town	State	Tons	Material Type
BoBbs Tire	Mattapoisett	MA	9	Tires
Good point recycling	Brockton	MA	37	Electronics/Computers
granite shore power	Bow	NH	498	Wood Waste
Lorusso Corp	Plainville	MA	4,041	Compostables/Organics
Lorusso Corp	Plainville	MA	1,362	DPW Waste
McConnel Enterprises	Braintree	MA	169	Metals

Disposed: 22,999

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Rochester	MA	22,999	MSW

Divert + Dispose = 29,115 (Divert+Dispose) - Accept: -1,596 % Difference: -5.20%

Municipality	*Region*	*Reg Obj Name and Address*	
CHATHAM	SE	TW NICKERSON WOOD RECLAMATION	*Receipt Status:* **Rec'd 2/17/2020**
Reg Obj Acct: 361836		160 MILL HILL RD	*Class:* LGHNDL - Large Handling Facility

Accepted: 11,163 | 11,163 | Check Accepted: **OK** | OpenDays: 300

Waste/Material Type	State	Tons
Wood Waste	MA	6,935
Compostables/Organics	MA	1,308
Asphalt Brick Concrete	MA	2,920

Diverted: 3,260

Vendor/End User	Town	State	Tons	Material Type
Various	Various	MA		Loam
Various	Various	MA	3,260	Asphalt Brick Concrete
Various	Various	MA		Compostables/Organics

Disposed:

Divert + Dispose = 3,260 (Divert+Dispose) - Accept: -7,903 % Difference: -70.80%

DANVERS	NE	DANVERS TRANSFER STATION	*Receipt Status:* **Rec'd 3/26/2020**
Reg Obj Acct: 173130		POPES RD/EAST COAST RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 85,151 | 85,151 | Check Accepted: **OK** | OpenDays: 302

Waste/Material Type	State	Tons
MSW	MA	85,151

Diverted: 299

Vendor/End User	Town	State	Tons	Material Type
Complete Recycling Solutions	Little Falls	MA	6	Electronics/Computers
JRM	Newburyport	MA	293	Metals

Disposed: 82,964

Disposal Site Name	Town	State	Tons	Waste Type
Covanta Haverhill	Haverhill	MA	78,234	MSW
CoVANTA SEAMASSI	Rochester	MA	752	MSW
Turnkey LF	Rochester	NH	1,359	MSW
wm fitchburg	Fitchburg	MA	247	MSW
WTI SAUGUS	Saugus	MA	2,372	MSW

Divert + Dispose = 83,263 (Divert+Dispose) - Accept: -1,888 % Difference: -2.22%

DiscrepExplan: due to drying material while sitting in storage at the facility DiscrepRspns:

DEDHAM	NE	DEDHAM TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 210300		5 INCINERATOR RD	*Class:* LGTRAN - Large Transfer Station

Accepted: | | Check Accepted: | OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
Framingham Salvage	Framingham	MA		Metals
Recycle America	Springfield	MA		Electronics/Computers
WM Raynham TS	Raynham	MA		C&D Waste
WM western processing fac	Wilbraham	MA		C&D Waste

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Fitchburg-Westminster LF	Westminister	MA		MSW
Wheelabrator Millbury	Millbury	MA		MSW

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*

DENNIS SE ROBERT CHILDS WOOD RECLAMATION *Receipt Status:* **Rec'd 1/28/2020**

Reg Obj Acct: 324535 169 GREAT WESTERN RD *Class:* LGHNDL - Large Handling Facility

Accepted: 11,797

Waste/Material Type	State	Tons
Wood Waste	MA	11,797

11,797 Check Accepted: **OK** OpenDays: 304

Diverted: 64,263

Vendor/End User	Town	State	Tons	Material Type
Various	Various	MA	53,553	Loam
Various	Various	MA	10,530	Wood Waste
Various (Misc)	Various	MA	180	Mulch

Disposed:

Divert + Dispose = 64,263 (Divert+Dispose) - Accept: 52,466 % Difference: 444.74%

DENNIS SE S&J EXCO C&D HANDLING FACILITY *Receipt Status:* **Rec'd 2/10/2020**

Reg Obj Acct: 173241 200 GREAT WESTERN RD *Class:* LGTRAN - Large Transfer Station

Accepted: 18,589

Waste/Material Type	State	Tons
C&D Waste	MA	18,589

18,589 Check Accepted: **OK** OpenDays: 304

Diverted: 18,541

Vendor/End User	Town	State	Tons	Material Type
Allied	Walpole	MA	327	Metals
ERRCO	Epping	NH	1,786	C&D Waste
jr vinagro corp	Johnston	RI	10,830	C&D Waste
NER	Tauton	MA	5,522	C&D Waste
S&J Exco	Dennis	MA	76	Asphalt Brick Concrete

Disposed: 28

Disposal Site Name	Town	State	Tons	Waste Type
Champion City	Brockton	MA	28	C&D Waste

Divert + Dispose = 18,569 (Divert+Dispose) - Accept: -20 % Difference: -0.11%

Municipality	*Region*	*Reg Obj Name and Address*	
EDGARTOWN	SE	EDGARTOWN CENTRAL FACILITY	*Receipt Status:* **Rec'd 1/30/2020**
Reg Obj Acct: 285171		750 WEST TISBURY RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 10,767 | 10,767 | Check Accepted: **OK** | OpenDays: 349

Waste/Material Type	State	Tons
MSW	MA	9,182
Wood Waste	MA	200
Tires	MA	6
General Recyclables	MA	526
Compostables/Organics	MA	7
Textiles/Clothing	MA	17
Metals	MA	276
Household Haz Waste	MA	16
Electronics/Computers	MA	17
Mulch	MA	520

Diverted: 1,585

Vendor/End User	Town	State	Tons	Material Type
Amercian Red Cross	Boston	MA	17	Textiles/Clothing
BoBbs Tire	Mattapoisett	MA	6	Tires
CRT Inc	East Freetown	MA	17	Electronics/Computers
EL Harvey	East Freetown	MA	127	Metals
EL Harvey	Westborough	MA	526	General Recyclables
INTERSTATE BATTERY	Dartmouth	MA	16	Household Haz Waste
island grown initive	Oak Bluffs	MA	520	Mulch
island grown initive	Oak Bluffs	MA	7	Compostables/Organics
John Keene	West Tisbury	MA	200	Wood Waste
Mid City Scrap	Westport	MA	149	Metals

Disposed: 9,182

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Rochester	MA	9,182	MSW

Divert + Dispose = 10,767 (Divert+Dispose) - Accept: 0 % Difference: 0.00%

EVERETT	NE	WOOD WASTE OF BOSTON INC	*Receipt Status:* **Pending**
Reg Obj Acct: 328984		85-87 BOSTON ST	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: | | Check Accepted: | OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
Crow Lane Landfill	Newburyport	MA		Asphalt Brick Concrete
Prolerized NE Co	Everett	MA		Metals

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Casella Waste	Hampden	ME		C&D Waste
Turnkey LF (WMI/TREE)	Rochester	NH		C&D Waste

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*

FALL RIVER SE REPUBLIC FALL RIVER TRANSFER STATION *Receipt Status:* **Rec'd 1/14/2020**

Reg Obj Acct: 547901 1080 AIRPORT RD *Class:* LGHNDL - Large Handling Facility

Accepted: 153,172

Waste/Material Type	State	Tons
MSW	MA	141,583
General Recyclables	MA	11,589

153,172 Check Accepted: **OK** OpenDays: 307

Diverted: 10,680

Vendor/End User	Town	State	Tons	Material Type
AuBURN CASELLA	Auburn	MA	9,697	General Recyclables
BoBbs Tire	New Bedford	MA	12	Tires
EL Harvey	Westborough	MA	883	General Recyclables
Mid City Scrap	Wesport	MA	88	Metals

Disposed: 136,556

Disposal Site Name	Town	State	Tons	Waste Type
Crapo Hill Landfill	Dartmouth	MA	1,477	MSW
SEMASS	West Wareham	MA	105,148	MSW
Waste Management	Middleborough	MA	29,931	MSW

Divert + Dispose = 147,236 (Divert+Dispose) - Accept: -5,936 % Difference: -3.88%

FALMOUTH SE BLACKSMITH SHOP FARMS WOOD RECLAMATION *Receipt Status:* **Pending**

Reg Obj Acct: 186654 716 BLACKSMITH SHOP RD *Class:* LGHNDL - Large Handling Facility

Accepted:

Check Accepted: OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
Various	Barnstable	MA		Mulch
Various	Barnstable	MA		Loam
Various	Barnstable	MA		Compostables/Organics

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Bourne Landfill	Bourne	MA		Wood Waste

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*		
FITCHBURG	CE	AKS RECYCLING INC	*Receipt Status:*	**Rec'd 2/14/2020**
Reg Obj Acct: 366279		15 COBBLER DR	*Class:*	CDLG - Large C&D Waste Processing Facility

Accepted: 108,509

Waste/Material Type	State	Tons
MSW	CT	9
MSW	MA	69,793
MSW	ME	6
MSW	NH	8,388
Wood Waste	MA	71
Wood Waste	NH	76
C&D Waste	CT	2
C&D Waste	MA	17,881
C&D Waste	NH	5,247
C&D Waste	VT	16
Tires	MA	3
Tires	NH	1
Compostables/Organics	MA	246
Metals	MA	258
Asphalt Brick Concrete	MA	3,778
Electronics/Computers	MA	14
Electronics/Computers	NH	1
Wood C&D	MA	2,227
Wood C&D	NH	492

108,509 Check Accepted: **OK** OpenDays: 308

Diverted: 16,306

Vendor/End User	Town	State	Tons	Material Type
complete Material Management	Southbridge	MA	424	Wood Waste
EERCO	Epping	NH	3,558	Wood Waste
EL Harvey	Westborough	MA	1,691	Wood Waste
EXCEL	Westport	MA	1,890	Metals
F&B Rubberized	New Bedford	MA	62	Tires
Harding Metals	Northwood	NH	24	Metals
intera materials	Jessup	MD	66	Household Haz Waste
northeast packaging	Billerica	MA	179	Cardboard
SCHNITZER	Everett	MA	923	Metals
Scrap It	Everett	MA	108	Metals
Scrap X	Providence	RI	32	Metals
Trl County	Ware	MA	1,285	C&D Waste
United Material Management	Millbury	MA	26	C&D Waste
United Material Management	Millbury	MA	2,475	Wood Waste
Western Recycling	Wilbraham	MA	910	C&D Waste
WTE	Greenfield	MA	56	Metals
zero waste	Bow	NH	2,597	C&D Waste

Disposed: 272,752

Disposal Site Name	Town	State	Tons	Waste Type
APEX SANITARY LANDFILL	Amsterdam	OH	6,880	MSW
Covanta	Haverhill	MA	14,549	MSW
North County Environmental	Bethlehem	NH	4,387	C&D Waste
North County Environmental	Bethlehem	NH	217	MSW
Turnkey LF (WMI/TREE)	Rochester	NH	1,695	C&D Waste
Waste Management	Rochester	NH	329	MSW
Waste Management	Fitchburg	MA	199,980	MSW
Western Recycling	Wilbraham	MA	25	MSW
Wheelabrator	Penacook	NH	10,533	MSW

Disposal Site Name	Town	State	Tons	Waste Type
Wheelabrator	Millbury	MA	32,863	MSW
zero waste	Bow	NH	1,294	MSW

Divert + Dispose = 289,058 (Divert+Dispose) - Accept: 180,549 % Difference: 166.39%

FITCHBURG CE HARVEY RECYCLING OF FITCHBURG LLC *Receipt Status:* **Pending**

Reg Obj Acct: 427718 50 ARBOR WAY *Class:* CDLG - Large C&D Waste Processing Facility

Accepted: Check Accepted: OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
E.L. Harvey	Westborough	MA		Plastics
E.L. Harvey	Westborough	MA		Mixed Paper
SCHNITZER NE	Everett	MA		Metals

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Boralex	Livermore Falls	ME		Demo Wood Chips
Domtar		CN		Demo Wood Chips
Thompson Enterprises	South China	ME		C&D Waste
Waste Management	Westminister	MA		C&D Waste

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

HARWICH SE OUR WOOD RECLAMATION FACILITY *Receipt Status:* **Rec'd 2/10/2020**

Reg Obj Acct: 329066 24 GREAT WESTERN RD *Class:* LGHNDL - Large Handling Facility

Accepted: 9,898

Waste/Material Type	State	Tons
Wood Waste	MA	9,898

9,898 Check Accepted: **OK** OpenDays: 304

Diverted: 41,378

Vendor/End User	Town	State	Tons	Material Type
homeowners/small contractors	Various	MA	1,075	Mulch
homeowners/small contractors	Various	MA	40,059	Loam
homeowners/small contractors	Various	MA	244	Wood Waste

Disposed:

Divert + Dispose = 41,378 (Divert+Dispose) - Accept: 31,480 % Difference: 318.04%

Municipality	*Region*	*Reg Obj Name and Address*	
HOLLISTON	CE	HOLLISTON TRANSFER STATION	*Receipt Status:* **Rec'd 3/13/2020**
Reg Obj Acct: 330447		115 WASHINGTON ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 123,008

Waste/Material Type	State	Tons
MSW	MA	89,162
C&D Waste	MA	30,740
General Recyclables	MA	3,106

123,008 Check Accepted: **OK** OpenDays: 255

Diverted: 33,894

Vendor/End User	Town	State	Tons	Material Type
EL Harvey	Westborough	MA	3,084	General Recyclables
Framingham Salvage	Framingham	MA	99	Metals
RE Energy	Salem	NH	30,705	C&D Waste
User Friendly Recycling	Stoughton	MA	6	Electronics/Computers

Disposed: 89,037

Disposal Site Name	Town	State	Tons	Waste Type
CMW Landfill	Carver	MA	25,754	MSW
Covanta	Springfield	MA	162	MSW
covanta S.E Connecticut EfW facility	Preston	CT	18	C&D Waste
covanta S.E Connecticut EfW facility	Preston	CT	3,419	MSW
Fitchburg LF	Fitchburg	MA	4,383	MSW
SEMASS	Rochester	MA	24	C&D Waste
SEMASS	Rochester	MA	52,935	MSW
Wheelabrator	Millbury	MA	3	Gypsum
Wheelabrator	Millbury	MA	2,339	MSW

Divert + Dispose = 122,931 (Divert+Dispose) - Accept: -77 % Difference: -0.06%

Municipality	*Region*	*Reg Obj Name and Address*		
HOLYOKE	WE	CASELLA OF HOLYOKE INC TRANSFER STATION	*Receipt Status:*	**Rec'd 2/5/2020**
Reg Obj Acct: 449795		686 MAIN ST	*Class:*	LGTRAN - Large Transfer Station

Accepted: 178,308

Waste/Material Type	State	Tons
MSW	MA	115,145
C&D Waste	MA	24,226
Other (NonMSW)	MA	902
Bulky Waste	MA	29,607
Asphalt Brick Concrete	MA	1
Residuals C&D	MA	8,427

178,308 Check Accepted: **OK** OpenDays: 302

Diverted: 3,389

Vendor/End User	Town	State	Tons	Material Type
F&B Rubberized	New Bedford	MA	4	Tires
freeman	Springfield	MA	143	Metals
K&W Materials and Recyling	West Springfield	MA	702	Wood C&D
kane Metal	Chicopee	MA	20	Metals
max salvage	Holyoke	MA	1,278	Asphalt Brick Concrete
max salvage	Holyoke	MA	2	Metals
Northcoast Services	Claremont	NH	6	Electronics/Computers
Northstar	Longmeadow	MA	176	Cardboard
Sullivan Steel	Holyoke	MA	872	Metals
WTE	Greenfield	MA	186	Metals

Disposed: 174,538

Disposal Site Name	Town	State	Tons	Waste Type
Chemung countyLF	Elmira	NY	241	MSW
Chicopee Landfill	Chicopee	MA	1,899	MSW
clinton county lf	Morrisonville	NY	43,196	MSW
Covanta	Springfield	MA	924	Wood C&D
Covanta	Pittsfield	MA	5,122	MSW
fulton county	Johnston	NY	182	MSW
Ontario County Landfill	Stanley	NY	1,005	MSW
pine avenue landfill	Niagara Falls	NY	4,803	Residuals C&D
Seneca Meadows Landfill	Waterloo	NY	67,366	MSW
Sunny Farms Landfill	Fostoria	OH	36,483	Residuals C&D
Wheelabrator	Hudson Falls	NY	13,060	MSW
Wheelabrator	Millbury	MA	257	MSW

Divert + Dispose = 177,927 (Divert+Dispose) - Accept: -381 % Difference: -0.21%

Municipality	*Region*	*Reg Obj Name and Address*

HOPKINTON CE MATERIALS RECOVERY & RECYCLING FACILITY *Receipt Status:* **Rec'd 2/14/2020**

Reg Obj Acct: 356519 0 WOOD ST *Class:* LGHNDL - Large Handling Facility

Accepted: 84,912

Waste/Material Type	State	Tons
General Recyclables	MA	84,912

84,912 Check Accepted: **OK** OpenDays: 307

Diverted: 60,481

Vendor/End User	Town	State	Tons	Material Type
EL Harvey	Hopkinton	MA	60,481	General Recyclables

Disposed: 24,431

Disposal Site Name	Town	State	Tons	Waste Type
Various	Various	VA	3,792	Recycling Residue
Various	Various	NY	16,389	Recycling Residue
Wheelabrator	Millbury	MA	4,250	Recycling Residue

Divert + Dispose = 84,912 (Divert+Dispose) - Accept: 0 % Difference: 0.00%

HUDSON CE HUDSON TRANSFER STATION *Receipt Status:* **Rec'd 2/15/2020**

Reg Obj Acct: 280116 300 COX ST *Class:* LGTRAN - Large Transfer Station

Accepted: 51,955

Waste/Material Type	State	Tons
MSW	MA	43,050
Tires	MA	10
General Recyclables	MA	389
Compostables/Organics	MA	997
Metals	MA	260
Wood C&D	MA	7,249

51,955 Check Accepted: **OK** OpenDays: 307

Diverted: 8,905

Vendor/End User	Town	State	Tons	Material Type
BoBbs Tire	Fall River	MA	10	Tires
BP Trucking	Ashland	MA	89	Cardboard
carney	Raynham	MA	67	Glass
FCR	Auburn	MA	233	General Recyclables
Framingham Salvage	Framingham	MA	260	Metals
JOBARB FARM	Hudson	MA	997	Mulch
LL & S	Salem	NH	7,249	Wood C&D

Disposed: 64,305

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Agawam	MA	24,709	MSW
Finch	Ganesvoort	NY	13,897	MSW
Seneca Meadows Landfill	Seneca Falls	MA	7,358	MSW
Wheelabrator	North Andover	MA	18,341	MSW

Divert + Dispose = 73,210 (Divert+Dispose) - Accept: 21,255 % Difference: 40.91%

Municipality	*Region*	*Reg Obj Name and Address*	
LENOX	WE	LENOX VALLEY WASTE TRANSFER FACILITY	*Receipt Status:* **Rec'd 2/7/2020**
Reg Obj Acct: 174773		68 WILLOW CREEK RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 20,308 | 20,308 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
MSW	MA	1,019
Wood Waste	MA	133
C&D Waste	MA	17,501
General Recyclables	MA	75
Compostables/Organics	MA	342
Cardboard	MA	206
Metals	MA	553
Plastics	MA	12
Electronics/Computers	MA	35
Shingles Asphalt	MA	432

Diverted: 1,356

Vendor/End User	Town	State	Tons	Material Type
Ben Weitsman	Albany	NY	553	Metals
MEADOW FARMS	Lee	MA	342	Compostables/Organics
raw maqterial recovery corp	Gardner	MA	35	Electronics/Computers
Sonoco	Holyoke	MA	206	Cardboard
TAM recycling Inc	Pownal	VT	12	Plastics
TAM recycling Inc	Pownal	VT	75	General Recyclables
Wm. Biers	Albany	NY	133	Wood Waste

Disposed: 18,952

Disposal Site Name	Town	State	Tons	Waste Type
Sunny Farms Landfill	Fostoria	OH	18,952	C&D Waste

Divert + Dispose = 20,308 (Divert+Dispose) - Accept: 0 % Difference: 0.00%

LEOMINSTER	CE	LEOMINSTER TRANSFER STATION	*Receipt Status:* **Rec'd 2/6/2020**
Reg Obj Acct: 369009		256 NEW LANCASTER ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 44,020 | 44,020 | Check Accepted: **OK** | OpenDays: 271

Waste/Material Type	State	Tons
MSW	MA	34,874
C&D Waste	MA	614
Tires	MA	1
Bulky Waste	MA	19
General Recyclables	MA	8,510
Electronics/Computers	MA	2

Diverted: 7,809

Vendor/End User	Town	State	Tons	Material Type
EL Harvey	Westborough	MA	132	General Recyclables
Electronic Recycling internationa	Holliston	MA	2	Electronics/Computers
LIBERTY TIRE	Ayer	MA	8	Tires
RRT recycling	Springfield	MA	1,007	Cardboard
SCHNITZER	Everett	MA	8	Metals
vinagro	Johnston	RI	325	C&D Waste
Waste management	Avon	MA	6,314	General Recyclables
WASTE MANAGEMENT RECY	Billerica	MA	13	General Recyclables

Disposed: 35,156

Disposal Site Name	Town	State	Tons	Waste Type
Fitchburg-Westminster LF	Westminster	MA	34,891	MSW
Wheelabrator Millbury	Millbury	MA	265	MSW

Divert + Dispose = 42,965 (Divert+Dispose) - Accept: -1,055 % Difference: -2.40%

DiscrepExplan: waste stream on floor from prior year DiscrepRspns:

Municipality	*Region*	*Reg Obj Name and Address*	
LYNN	NE	LYNN TRANSFER STATION	*Receipt Status:* **Rec'd 3/26/2020**
Reg Obj Acct: 360908		247A COMMERCIAL ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 198,887 | 198,887 | Check Accepted: **OK** | OpenDays: 250

Waste/Material Type	State	Tons
MSW	MA	198,887

Diverted: 33

Vendor/End User	Town	State	Tons	Material Type
Complete Recycling Solutions	Fall River	MA		Other (NonMSW)
turner metal	Lynn	MA	33	Metals

Disposed: 196,932

Disposal Site Name	Town	State	Tons	Waste Type
Bourne ISWF	Bourne	MA	371	MSW
CMW Landfill	Carver	MA	1,909	MSW
Covanta Haverhill	Haverhill	MA	76,285	MSW
Fitchburg LF	Fitchburg	MA	715	MSW
preston, ct	Preston	CT	1,194	MSW
SEMASS	Bourne	MA	88,371	MSW
Turnkey LF	Rochester	NH	28,087	MSW

Divert + Dispose = 196,965 | (Divert+Dispose) - Accept: -1,922 | % Difference: -0.97%

Municipality	*Region*	*Reg Obj Name and Address*	
MARLBORO	CE	POST ROAD TRANSFER & RECYCLING FACILITY	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 173173		791 BOSTON POST RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 35,655 | 35,655 | Check Accepted: **OK** | OpenDays: 266

Waste/Material Type	State	Tons
MSW	MA	35,044
C&D Waste	MA	584
Tires	MA	2
Bulky Waste	MA	2
Metals	MA	1
Electronics/Computers	MA	4
Mattresses	MA	18

Diverted: 235

Vendor/End User	Town	State	Tons	Material Type
Beaupre Scrap	Worcester	MA	6	Metals
EL Harvey	Westborough	MA	1	Cardboard
Electronic Recycling internationa	Holliston	MA	4	Electronics/Computers
LIBERTY TIRE	Littleton	MA	12	Tires
MiGHTY FLAME	Clyde	NY	1	Metals
vinagro	Johnston	RI	211	C&D Waste

Disposed: 35,204

Disposal Site Name	Town	State	Tons	Waste Type
RCI FITCHBURG LF	Westminister	MA	34,356	MSW
WTI SAUGUS	Saugus	MA	848	MSW

Divert + Dispose = 35,439 | (Divert+Dispose) - Accept: -216 | % Difference: -0.61%

DiscrepExplan: waste still on floor | DiscrepRspns:

Municipality	*Region*	*Reg Obj Name and Address*	
MARLBORO	CE	WECARE ENVIRONMENTAL COMPOST FACILITY	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 378494		856 BOSTON POST RD	*Class:* CMPOST - Site Assigned Compost Facility

Accepted: 26,292 | 26,292 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
MSW	CT	34
MSW	MA	10,553
Wood Waste	MA	334
Sludge (WWTP)	MA	6,161
Tires	MA	18
Bulky Waste	MA	1,571
General Recyclables	MA	629
Compostables/Organics	MA	6,297
Compostables/Organics	NY	336
Metals	MA	359

Diverted: 2,360

Vendor/End User	Town	State	Tons	Material Type
carney	Raynham	MA	923	Compostables/Organics
Framingham Salvage	Framingham	MA	359	Metals
JP Routhier	Littleton	MA	18	Tires
smithfield peat	Smithfield	RI	334	Wood Waste
WeCare environmental	Marlboro	MA	726	Sludge (WWTP)

Disposed: 14,235

Disposal Site Name	Town	State	Tons	Waste Type
Arrowhead Landfill	Perrycounty	AL	695	MSW
clinton county lf	Morrisonville	NY	168	MSW
Seneca Meadows LF	Waterloo	NY	13,372	MSW

Divert + Dispose = 16,595 (Divert+Dispose) - Accept: -9,697 % Difference: -36.88%

MARLBOROUGH	CE	POST ROAD TRANSFER & RECYCLING FACILITY	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 173173		791 BOSTON POST RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 35,655 | 35,655 | Check Accepted: **OK** | OpenDays: 266

Waste/Material Type	State	Tons
MSW	MA	35,044
C&D Waste	MA	584
Tires	MA	2
Bulky Waste	MA	2
Metals	MA	1
Electronics/Computers	MA	4
Mattresses	MA	18

Diverted: 235

Vendor/End User	Town	State	Tons	Material Type
Beaupre Scrap	Worcester	MA	6	Metals
EL Harvey	Westborough	MA	1	Cardboard
Electronic Recycling internationa	Holliston	MA	4	Electronics/Computers
LIBERTY TIRE	Littleton	MA	12	Tires
MiGHTY FLAME	Clyde	NY	1	Metals
vinagro	Johnston	RI	211	C&D Waste

Disposed: 35,204

Disposal Site Name	Town	State	Tons	Waste Type
RCI FITCHBURG LF	Westminister	MA	34,356	MSW
WTI SAUGUS	Saugus	MA	848	MSW

Divert + Dispose = 35,439 (Divert+Dispose) - Accept: -216 % Difference: -0.61%

DiscrepExplan: waste still on floor DiscrepRspns:

Municipality	*Region*	*Reg Obj Name and Address*	
MARLBOROUGH	CE	WECARE ENVIRONMENTAL COMPOST FACILITY	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 378494		856 BOSTON POST RD	*Class:* CMPOST - Site Assigned Compost Facility

Accepted: 26,292 | 26,292 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
MSW	CT	34
MSW	MA	10,553
Wood Waste	MA	334
Sludge (WWTP)	MA	6,161
Tires	MA	18
Bulky Waste	MA	1,571
General Recyclables	MA	629
Compostables/Organics	MA	6,297
Compostables/Organics	NY	336
Metals	MA	359

Diverted: 2,360

Vendor/End User	Town	State	Tons	Material Type
carney	Raynham	MA	923	Compostables/Organics
Framingham Salvage	Framingham	MA	359	Metals
JP Routhier	Littleton	MA	18	Tires
smithfield peat	Smithfield	RI	334	Wood Waste
WeCare environmental	Marlboro	MA	726	Sludge (WWTP)

Disposed: 14,235

Disposal Site Name	Town	State	Tons	Waste Type
Arrowhead Landfill	Perrycounty	AL	695	MSW
clinton county lf	Morrisonville	NY	168	MSW
Seneca Meadows LF	Waterloo	NY	13,372	MSW

Divert + Dispose = 16,595 (Divert+Dispose) - Accept: -9,697 % Difference: -36.88%

Municipality	*Region*	*Reg Obj Name and Address*	
MARSHFIELD	SE	MARSHFIELD TRANSFER STATION	*Receipt Status:* **Rec'd 2/11/2020**
Reg Obj Acct: 299300		23 CLAY PIT RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 14,918 | 14,918 Check Accepted: **OK** OpenDays: 302

Waste/Material Type	State	Tons
MSW	MA	7,633
Wood Waste	MA	175
C&D Waste	MA	1,953
Tires	MA	7
General Recyclables	MA	3,220
Compostables/Organics	MA	1,350
Textiles/Clothing	MA	20
Metals	MA	501
Household Haz Waste	MA	1
Electronics/Computers	MA	58

Diverted: 5,332

Vendor/End User	Town	State	Tons	Material Type
Bay State Textile	Marston Mills	MA	16	Textiles/Clothing
Complete Recycling Solutions	Fall River	MA	58	Electronics/Computers
fbs tire recycling	Littleton	MA	7	Tires
Marshfield Residents	Marshfield	MA	1,350	Compostables/Organics
Red Cross	Marshfield	MA	4	Textiles/Clothing
REPUBLIC SERVICES	Fall River	MA	3,220	General Recyclables
RINDGE ENERGY	Rindge	NH	1	Metals
Speigel	Brockton	MA	500	Metals
Synergy Metals Recycling	Seekonk	MA	1	Household Haz Waste
town of mashfield	Mashfield	MA	175	Wood Waste

Disposed: 9,587

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Rochester	MA	1,953	C&D Waste
Covanta	Rochester	MA	7,634	MSW

Divert + Dispose = 14,919 (Divert+Dispose) - Accept: 1 % Difference: 0.01%

Municipality	*Region*	*Reg Obj Name and Address*	
MELROSE	NE	WMI CONNOLLY TRANSFER STATION	*Receipt Status:* **Rec'd 2/11/2020**
Reg Obj Acct: 318665		740 BROADWAY	*Class:* LGTRAN - Large Transfer Station

Accepted: 49,847 | 49,847 | Check Accepted: **OK** | OpenDays: 255

Waste/Material Type	State	Tons
MSW	MA	49,645
MSW	NH	14
C&D Waste	MA	174
Tires	MA	1
Electronics/Computers	MA	6
Mattresses	MA	7

Diverted: 158

Vendor/End User	Town	State	Tons	Material Type
Organic Waste Management	Malden	MA	2	Cardboard
rsr recycling	Raynham	MA	49	C&D Waste
SCHNITZER	Everett	MA	30	Metals
vinagro	Johnston	RI	77	C&D Waste

Disposed: 49,459

Disposal Site Name	Town	State	Tons	Waste Type
RCI FITCHBURG LF	Fitchburg	MA	621	MSW
Turnkey LF	Rochester	NH	44,908	MSW
WTI NORTH ANDOVER	North Andover	MA	609	MSW
WTI SAUGUS	Saugus	MA	3,321	MSW

Divert + Dispose = 49,617 (Divert+Dispose) - Accept: -230 % Difference: -0.46%

METHUEN	NE	METHUEN TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 173278		HUNTINGTON AVE	*Class:* LGTRAN - Large Transfer Station

Accepted: | | Check Accepted: | OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
City of Methuen	Methuen	MA		Compostables/Organics
City of Methuen	Methuen	MA		Wood Waste
Daves Scrap Tire	North Reading	MA		Tires
Windfield Alloy	Lawrence	MA		Electronics/Computers
Windfield Alloy	Lawrence	MA		General Recyclables

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
LL&S	Salem	NH		C&D Waste

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*	
MILLBURY	CE	UNITED MATERIAL MANAGEMENT OF MILLBURY	*Receipt Status:* **Rec'd 2/13/2020**
Reg Obj Acct: 575274		333A SOUTHWEST CUTOFF	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 175,835 | 175,835 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
MSW	MA	17,757
C&D Waste	MA	146,386
Bulky Waste	MA	11,692

Diverted: 126,756

Vendor/End User	Town	State	Tons	Material Type
Various	Various	MA	241	Gypsum
Various	Various	MA	11,443	Fines C&D
Various	Various	MA	73,767	Asphalt Brick Concrete
Various	Various	MA	9,325	Metals
Various	Various	MA	13,011	Cardboard
Various	Various	MA	18,969	Wood Waste

Disposed: 52,630

Disposal Site Name	Town	State	Tons	Waste Type
Various	Various	MA	34,873	Residuals C&D
Various	Various	MA	17,757	MSW

Divert + Dispose = 179,386 | (Divert+Dispose) - Accept: 3,551 | % Difference: 2.02%

DiscrepExplan: additional tons due to water from misting system and inventory fluctuation | DiscrepRspns:

MILLBURY	CE	WHEELABRATOR MILLBURY TRANSFER STATION	*Receipt Status:* **Rec'd 2/19/2020**
Reg Obj Acct: 325504		331 SOUTHWEST CUTOFF RD	*Class:* LGTRAN - Large Transfer Station

Accepted: | | Check Accepted: **Problem** | OpenDays: 0

Diverted:

Disposed:

Divert + Dispose = 0 | (Divert+Dispose) - Accept: | % Difference:

NANTUCKET	SE	NANTUCKET COMPOST FACILITY	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 303223		188 MADAKET RD	*Class:* CMPOST - Site Assigned Compost Facility

Accepted: 13,213 | 13,213 | Check Accepted: **OK** | OpenDays: 355

Waste/Material Type	State	Tons
Wood Waste	MA	635
C&D Waste	MA	9,023
Tires	MA	15
Other (NonMSW)	MA	2,455
Metals	MA	820
Asphalt Brick Concrete	MA	261
Electronics/Computers	MA	4

Diverted: 13,198

Vendor/End User	Town	State	Tons	Material Type
A&P Enterprises	Berkley	MA	4	Electronics/Computers
Champion City	Brockton	MA	9,023	C&D Waste
F&B Rubberized	New Bedford	MA	15	Tires
Miller Recycling Corp	Mansfield	MA	1,116	Cardboard
Miller Recycling Corp	Mansfield	MA	403	General Recyclables
nantucket composting	Nantucket	MA	635	Wood Waste
Nantucket Landfill	Nantucket	MA	261	Asphalt Brick Concrete
Nantucket Landfill	Nantucket	MA	921	Glass
Spiegal	Brockton	MA	820	Metals

Disposed:

Divert + Dispose = 13,198 | (Divert+Dispose) - Accept: -15 | % Difference: -0.11%

Municipality	*Region*	*Reg Obj Name and Address*	
NANTUCKET	SE	NANTUCKET HANDLING FACILITY	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 457936		188 MADAKET RD	*Class:* SMHNDL - Small Handling Facility

Accepted: 53,607 | 53,607 | Check Accepted: **OK** | OpenDays: 355

Waste/Material Type	State	Tons
MSW	MA	11,440
Wood Waste	MA	14,996
C&D Waste	MA	9,023
Tires	MA	15
General Recyclables	MA	403
Compostables/Organics	MA	209
Cardboard	MA	1,116
Metals	MA	820
Glass	MA	921
Asphalt Brick Concrete	MA	261
Electronics/Computers	MA	4
Sludge (Industrial)	MA	1,693
Loam	MA	12,706

Diverted: 53,331

Vendor/End User	Town	State	Tons	Material Type
A&P Enterprises	Berkley	MA	36	Electronics/Computers
Champion City	Brockton	MA	8,710	C&D Waste
F&B Rubberized	New Bedford	MA	94	Tires
Miller Recycling Corp	Mansfield	MA	1,116	Cardboard
Miller Recycling Corp	Mansfield	MA	403	General Recyclables
Spiegal	Brockton	MA	729	Metals
Various	Nantucket	MA	17	Loam
Waste Options	Nantucket	MA	12,706	Loam
Waste Options	Nantucket	MA	1,902	Sludge (Industrial)
Waste Options	Nantucket	MA	261	Asphalt Brick Concrete
Waste Options	Nantucket	MA	921	Glass
Waste Options	Nantucket	MA	14,996	Wood Waste
Waste Options	Nantucket	MA	11,440	MSW

Disposed: 3,300

Disposal Site Name	Town	State	Tons	Waste Type
Nantucket Landfill	Nantucket	MA	3,300	Recycling Residue

Divert + Dispose = 56,631 (Divert+Dispose) - Accept: 3,024 % Difference: 5.64%

Municipality	*Region*	*Reg Obj Name and Address*	
NEEDHAM	NE	NEEDHAM TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 173149		1421 CENTRAL AVE	*Class:* LGTRAN - Large Transfer Station

Accepted: Check Accepted: OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
CRT Recycle	Raynham	MA		Electronics/Computers
fiore trucking	Fitchburg	MA		General Recyclables
Framingham Salvage	Framingham	MA		Metals
Goodwill Industries	Boston	MA		Textiles/Clothing
Integrated Paper Recycling	Salem	MA		General Recyclables
Needham Compost Site	Needham	MA		Compostables/Organics
Routhier & Sons	Littleton	MA		Tires

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Commercial Paving	Scarborough	ME		Demo Wood Chips
Crapo Hill Landfill	New Bedford	MA		DPW Waste
Devito Trucking Inc	Salem	NH		Demo Wood Chips
Wheelabrator Millbury	Millbury	MA		MSW

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

NEW BEDFORD	SE	NEW BEDFORD TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 319489		1103 SHAWMUT AVE	*Class:* LGTRAN - Large Transfer Station

Accepted: Check Accepted: OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
AAA Recycling	New Bedford	MA		Plastics
AW Martin	New Bedford	MA		Mixed Paper
BFI Brockton	Brockton	MA		General Recyclables
Bobs Tire	Mattapoisett	MA		Tires
ElectroniCycle	Gardner	MA		Electronics/Computers
EXCEL	Westport	MA		Metals
Got Books	North Reading	MA		Swap Shop
Mid City Scrap	Westport	MA		Metals
New Bedford Waste Services	New Bedford	MA		Mattresses
New Bedford Waste Services	New Bedford	MA		C&D Waste
Red Cross		MA		Textiles/Clothing
STRATEGIC MATERIALS	Franklin	MA		Glass

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Crapo Hill Landfill	Dartmouth	MA		MSW

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*	
NEW BEDFORD	SE	NEW BEDFORD WASTE SERVICES TRANS STATION	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 319953		1245 SHAWMUT AVE	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 98,881

Waste/Material Type	State	Tons
MSW	MA	64,522
Wood Waste	MA	714
C&D Waste	MA	30,023
Asphalt Brick Concrete	MA	143
Residuals C&D	MA	1,315
Wood C&D	MA	2,164

98,881 Check Accepted: **OK** OpenDays: 279

Diverted: 18,013

Vendor/End User	Town	State	Tons	Material Type
A&E Metals Recycling & Packag	Westport	MA	128	General Recyclables
Attleboro LF	Attleboro	MA	8,988	Fines C&D
Crapo Hill Landfill	Dartmouth	MA	4,005	Residuals C&D
david farias	Westport	MA	17	Asphalt Brick Concrete
Domtar	Bromptonville	QC	253	Wood C&D
double s farms	Dartmouth	MA	129	Asphalt Brick Concrete
Eco Recycling	Brockton	MA	161	General Recyclables
EXCEL	Westport	MA	78	General Recyclables
F&B Rubberized	New Bedford	MA	29	Tires
green mattress	Milford	MA	179	Mattresses
JM Equipmet	Freetown	MA	92	Asphalt Brick Concrete
Mid City Scrap	Westport	MA	760	General Recyclables
nbws	New Bedford	MA	212	General Recyclables
NE RECYLING	Taunton	MA	23	C&D Waste
TAFISA	Lac-Megantic	QC	2,928	Wood C&D
zero waste	Rochester	MA	31	MSW

Disposed: 79,287

Disposal Site Name	Town	State	Tons	Waste Type
AGGREGATE RECYCLING CORP	Eliot	ME	2,053	MSW
APEX SANITARY LANDFILL	Amsterdam	OH	132	MSW
baunswick lf	Lawrenceville	VA	21	MSW
Bourne ISWF	Bourne	MA	106	MSW
Carbon LF	Lowellville	OH	867	MSW
cfs	Victoria	VA	21	MSW
Champion City	Brockton	MA	8,586	MSW
dunn landfill	Rensellaer	NY	1,115	C&D Waste
Fitchburg LF	Fitchburg	MA	30,938	MSW
Middleborough Landfill	Middleborough	MA	2,038	MSW
SEMASS	Bourne	MA	24,892	MSW
Taunton Landfill	Taunton	MA	4,795	MSW
Turnkey LF	Rochester	NH	3,723	MSW

Divert + Dispose = 97,300 (Divert+Dispose) - Accept: -1,581 % Difference: -1.60%

Municipality	*Region*	*Reg Obj Name and Address*	
NORTH ANDOVER	NE	TBI RECYCLING FACILITY	*Receipt Status:* **Rec'd 2/13/2020**
Reg Obj Acct: 291858		210 HOLT RD	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 57,861

Waste/Material Type	State	Tons
C&D Waste	MA	18,749
Other (NonMSW)	MA	27,646
Bulky Waste	MA	11,466

57,861 Check Accepted: **OK** OpenDays: 200

Diverted: 6,447

Vendor/End User	Town	State	Tons	Material Type
charles george	Billerica	MA	76	Cardboard
dynamic waste systems	North Andover	MA	273	Cardboard
ERRCO	Epping	NH	747	C&D Waste
EXCEL	Westport	MA	490	Metals
prospect I & S	Lawrence	MA	344	Metals
Sappi	Westbrook	ME	2,628	Wood Waste
SCHNITZER	Everett	MA	640	Metals
Scrap It	Chelsea	MA	219	Metals
TAFISA	Lac-Megantic	QC	878	Wood Waste
UMM	Millbury	MA	152	C&D Waste

Disposed: 51,465

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Haverhill	MA	3,448	Other (NonMSW)
mount carberry	Berlin	NH	4,593	Other (NonMSW)
north country landfill	Bethlehem	NH	6,235	Other (NonMSW)
Tri-Country Recycling	Ware	MA	12,182	Residuals C&D
Waste Management	Rochester	NH	23,877	Residuals C&D
Western Recycling	Wilbraham	MA	1,093	Fines C&D
Wheelabrator	North Andover	MA	37	Other (NonMSW)

Divert + Dispose = 57,912 (Divert+Dispose) - Accept: 51 % Difference: 0.09%

Municipality	*Region*	*Reg Obj Name and Address*	
NORTHAMPTON	WE	NORTHAMPTON EASTHAMPTON ROAD TRANS STAT	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 174929		234 EASTHAMPTON RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 63,610 | 63,610 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
MSW	MA	34,840
C&D Waste	MA	27,585
General Recyclables	MA	1,185

Diverted: 4,822

Vendor/End User	Town	State	Tons	Material Type
Empire Tires	Planfield	CT	18	Tires
goldstar recycling	Palmer	MA	13	Electronics/Computers
kane Metal	Chicopee	MA	411	Metals
MRF	Springfield	MA	299	General Recyclables
Sonoco	Holyoke	MA	472	Mixed Paper
Sonoco	Holyoke	MA	229	Cardboard
USA Babalon	Berlin	CT	66	C&D Waste
USA ELM St	Hatfield	MA	35	General Recyclables
Western Recycling	Wilbraham	MA	1,929	C&D Waste
wheelabrator	Hudson Falls	NY	935	Wood Waste
WTE	Greenfield	MA	415	Metals

Disposed: 58,239

Disposal Site Name	Town	State	Tons	Waste Type
clinton county lf	Morrisonville	NY	387	MSW
Covanta	Pittsfield	MA	2,318	MSW
dunn landfill	Rensellaer	NY	6,594	MSW
ECO Power	Springfield	MA	519	MSW
fulton county	Johnston	NY	3,193	MSW
Ontario County Landfill	Stanley	NY	23,328	MSW
Seneca Meadows Landfill	Seneca Falls	NY	14,784	MSW
Wheelabrator	Hudson Falls	NY	7,116	MSW

Divert + Dispose = 63,061 (Divert+Dispose) - Accept: -549 % Difference: -0.86%

ORLEANS	SE	DANIELS C&D TRANSFER FACILITY	*Receipt Status:* **Rec'd 2/13/2020**
Reg Obj Acct: 379180		29 GIDDIAH HILL RD	*Class:* SMHNDL - Small Handling Facility

Accepted: 7,665 | 7,665 | Check Accepted: **OK** | OpenDays: 306

Waste/Material Type	State	Tons
C&D Waste	MA	7,665

Diverted: 7,228

Vendor/End User	Town	State	Tons	Material Type
jr vinagro corp	Johnston	RI	4,497	C&D Waste
Mid City Scrap	Westport	MA	156	Metals
Mid City Scrap	Westport	MA	319	Cardboard
NER	Taunton	MA	2,256	C&D Waste

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Boralex	Livermore Falls	ME		Demo Wood Chips

Divert + Dispose = 7,228 (Divert+Dispose) - Accept: -437 % Difference: -5.70%

Municipality	*Region*	*Reg Obj Name and Address*	
OXFORD	CE	OXFORD TRANSFER STATION	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 290748		200 LEICESTER ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 77,050 | 77,050 | Check Accepted: **OK** | OpenDays: 261

Waste/Material Type	State	Tons
MSW	MA	52,752
C&D Waste	MA	24,298

Diverted: 21,817

Vendor/End User	Town	State	Tons	Material Type
C&D Tires	Fairhaven	MA	27	Tires
casella	Auburn	MA	29	Cardboard
casella	Holyoke	MA	207	C&D Waste
Excel Recycling	Charlton	MA	156	C&D Waste
Northcoast Services	Portsmouth	NH	64	Electronics/Computers
RE Energy	Lewiston	ME	12,041	C&D Waste
superior waste	Worcester	MA	12	Mattresses
UMM	Millbury	MA	72	Gypsum
UMM	Millbury	MA	9,209	C&D Waste

Disposed: 55,046

Disposal Site Name	Town	State	Tons	Waste Type
Arrowhead Landfill	Uniontown	AL	27	MSW
CASELLA	Morrisonville	NY	7,644	MSW
Covanta	Rochester	MA	5,335	MSW
fulton county	Johnston	NY	10,967	MSW
North County Environmental	Bethlehem	NH	14,650	MSW
PERC	Orrington	ME	2,395	MSW
Wheelabrator	Millbury	MA	14,028	MSW

Divert + Dispose = 76,863 (Divert+Dispose) - Accept: -187 % Difference: -0.24%

PEABODY	NE	ALLIED PEABODY TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 326369		295 FOREST ST	*Class:* LGTRAN - Large Transfer Station

Accepted: | | Check Accepted: | OpenDays:

Diverted:

Disposed:

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*	
PEABODY	NE	ALLIED WASTE SYSTEMS DBA	*Receipt Status:* **Rec'd 1/28/2020**
Reg Obj Acct: 326372		300 FOREST ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 177,086

Waste/Material Type	State	Tons
MSW	MA	119,624
C&D Waste	MA	57,462

177,086 Check Accepted: **OK** OpenDays: 274

Diverted: 31,447

Vendor/End User	Town	State	Tons	Material Type
casella	Charlestown	MA	3	Mixed Paper
DeVENS RECYCLING	Devens	MA	9,987	C&D Waste
JP Routhier	Littleton	MA	7	Tires
north gate recycling	Revere	MA	70	Asphalt Brick Concrete
North Shore Recycled Fibers	Salem	MA	15	Mixed Paper
RE Energy	Lewiston	ME	12,616	C&D Waste
Scrap It	Everett	MA	157	Metals
Stoughton Landfill	Stoughton	MA	34	Gypsum
Trl County	Ware	MA	1,078	C&D Waste
Western Recycling	Wilbraham	MA	2,349	C&D Waste
zero waste	Bow	NH	5,131	C&D Waste

Disposed: 148,423

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Haverhill	MA	34,730	MSW
Fitchburg LF	Fitchburg	MA	245	MSW
PERC	Orrington	ME	5,366	MSW
SEMASS	West Wareham	MA	6,209	MSW
Turnkey LF	Rochester	NH	99,096	MSW
Wheelabrator	North Andover	MA	2,777	MSW

Divert + Dispose = 179,870 (Divert+Dispose) - Accept: 2,784 % Difference: 1.57%

Municipality	*Region*	*Reg Obj Name and Address*		
RAYNHAM	SE	RAYNHAM REGIONAL PROCESSING & TRNSFR FAC	*Receipt Status:*	**Rec'd 3/13/2020**
Reg Obj Acct: 373036		35 THRASHER ST	*Class:*	CDLG - Large C&D Waste Processing Facility

Accepted: 104.478

Waste/Material Type	State	Tons
MSW	MA	51,486
C&D Waste	MA	36,859
C&D Waste	RI	504
Bulky Waste	MA	12,805
Bulky Waste	RI	157
General Recyclables	MA	2
Cardboard	MA	1
Metals	MA	14
Electronics/Computers	MA	7
Gypsum	MA	61
Mattresses	MA	6
Shingles Asphalt	MA	1,732
Shingles Asphalt	RI	3
Wood C&D	MA	841

104.478 Check Accepted: **OK** OpenDays: 306

Diverted: 19,092

Vendor/End User	Town	State	Tons	Material Type
Attleboro LF	Attleboro	MA	32	Asphalt Brick Concrete
bridgewater farms	Bridgewater	MA	8	Wood Waste
brs inc.	Bridgewater	MA	7	Wood Waste
carney	Raynham	MA	132	Gypsum
carney	Raynham	MA	1,340	Asphalt Brick Concrete
Crapo Hill Landfill	Dartmouth	MA	183	Residuals C&D
data recycling	Assonet	MA	5	Electronics/Computers
Eco Recycling	Brockton	MA	99	Metals
F&B Enterprises	Littleton	MA	30	Tires
Fitchburg LF	Fitchburg	MA	28	Residuals C&D
Middleboro Landfill	Middleboro	MA	3,517	Residuals C&D
NE RECYLING	Taunton	MA	64	Wood Waste
new england waste disposal	Taunton	MA	23	Wood C&D
Plainfield power	Plainfield	CT	1,253	Wood Waste
pondview	Providence	RI	23	Residuals C&D
pondview	Providence	RI	264	Wood Waste
SCHNITZER	Attleboro	MA	389	Metals
SCHNITZER everett	Everett	MA	76	Metals
SCHNITZER providence	Providence	RI	63	Metals
SCHNITZER worcester	Worcester	MA	14	Metals
TAFISA	Lac-Megantic	QC	5,075	Wood Waste
Taunton Landfill	Taunton	MA	647	Asphalt Brick Concrete
Taunton Landfill	Taunton	MA	4,377	Residuals C&D
taunton scrap	Taunton	MA	1,443	Metals

Disposed: 87,511

Disposal Site Name	Town	State	Tons	Waste Type
Bourne ISWF	Bourne	MA	114	MSW
casella holyoke	Holyoke	MA	2,907	Fines C&D
CMW Landfill	Carver	MA	3,830	Fines C&D
Fitchburg LF	Fitchburg	MA	18,509	MSW
new england waste	Taunton	MA	6	Gypsum
new england waste	Taunton	MA	1,302	Residuals C&D
new england waste disposal	Taunton	MA	3,894	Fines C&D

Disposal Site Name	Town	State	Tons	Waste Type
SEMASS	Bourne	MA	28,966	MSW
Taunton Landfill	Taunton	MA	292	MSW
Western Recycling	Wilbraham	MA	1,315	Fines C&D
Wheelabrator Millbury	Millbury	MA	10,562	MSW
Wheelabrator North Andover	North Andover	MA	4,766	MSW
Wheelabrator Saugus	Saugus	MA	11,048	MSW

Divert + Dispose = 106,603 (Divert+Dispose) - Accept: 2,125 % Difference: 2.03%

DiscrepExplan: addition of water for dust control DiscrepRspns:

RAYNHAM SE WASTE MANAGEMNT OF MASSACHUSETTS INC *Receipt Status:* **Pending**

Reg Obj Acct: 605468 35 THRASHER ST *Class:* LGTRAN - Large Transfer Station

Accepted: Check Accepted: OpenDays:

Diverted:

Disposed:

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

ROCHESTER SE NEW BEDFORD WASTE SERVICES LLC ROCHESTER *Receipt Status:* **Rec'd 2/10/2020**

Reg Obj Acct: 281845 48 CRANBERRY HWY *Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 20,911 20,911 Check Accepted: **OK** OpenDays: 253

Waste/Material Type	State	Tons
C&D Waste	MA	18,056
General Recyclables	MA	2,396
Cardboard	MA	375
Asphalt Brick Concrete	MA	84

Diverted: 7,523

Vendor/End User	Town	State	Tons	Material Type
casella charlestown	Charlestown	MA	2,828	General Recyclables
Mid City Scrap	Westport	MA	103	General Recyclables
nbws	New Bedford	MA	2,072	Wood C&D
NE RECYLING	Taunton	MA	1,658	C&D Waste
nws	New Bedford	MA	436	C&D Waste
Patriot Disposal	Johnston	RI	348	C&D Waste
STOUGHTON RECYCLING	Stoughton	MA	78	C&D Waste

Disposed: 12,710

Disposal Site Name	Town	State	Tons	Waste Type
Champion City	Brockton	MA	12,710	C&D Waste

Divert + Dispose = 20,233 (Divert+Dispose) - Accept: -678 % Difference: -3.24%

ROCHESTER SE SEMASS RESOURCE RECOVERY FACILITY *Receipt Status:* **Pending**

Reg Obj Acct: 522119 141 CRANBERRY HWY *Class:* SMHNDL - Small Handling Facility

Accepted: Check Accepted: OpenDays:

Diverted:

Disposed:

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*	
SALEM	NE	SALEM TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 173161		12 SWAMPSCOTT RD	*Class:* LGTRAN - Large Transfer Station

Accepted: Check Accepted: OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
BDS	Norridgewock	ME		Tires
Miles River	Ipswich	MA		Asphalt Brick Concrete
Pro Bark	Plaistow	NH		Compostables/Organics
Prolerized NE Co	Everett	MA		Metals

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
NE Solid Waste Comm	North Andover	MA		C&D Waste

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*		
SANDWICH	SE	NEW BEDFORD WASTE SERVICES LLC SANDWICH	*Receipt Status:*	**Rec'd 1/22/2020**
Reg Obj Acct: 513300		295 SERVICE RD	*Class:*	LGHNDL - Large Handling Facility

Accepted: 19,250

Waste/Material Type	State	Tons
MSW	MA	1,555
General Recyclables	MA	15,911
Cardboard	MA	1,728
Mixed Paper	MA	21
Plastics	MA	35

19,250 Check Accepted: **OK** OpenDays: 162

Diverted: 9,523

Vendor/End User	Town	State	Tons	Material Type
Amercian Chung Nam LLC	City Of Industry	CA	260	General Recyclables
Amercian Paper Recycling	Claremont	NH	46	General Recyclables
Canaan Recycling	Valley Sream	NY	28	General Recyclables
CANUSA HERSHMAN RECYCL	Branford	CT	2,781	General Recyclables
casella	Scarborough	ME	319	General Recyclables
continental paper grading	Chicago	IL	291	General Recyclables
ekman recycling	Wall	NY	306	General Recyclables
gottlieb inc	Neville Island	PA	19	General Recyclables
gp harmon domestic	Dotham	AL	457	General Recyclables
gp harmon export	Dotham	AL	1,589	General Recyclables
khanna paper inc	N Beagen	NJ	923	General Recyclables
Mid City Scrap	Westport	MA	323	General Recyclables
Nathan H Kelman inc	Cohoes	NY	51	General Recyclables
NBW Environmental services	New Bedford	MA	203	General Recyclables
selectr trading	Caldwell	NJ	1,400	General Recyclables
storelli recycling	Ft Lauderdale	FL	527	General Recyclables

Disposed: 4,664

Disposal Site Name	Town	State	Tons	Waste Type
APEX SANITARY LANDFILL	Amsterdam	OH	188	MSW
brunswick	Lawrenceville	VA	114	MSW
Carbon LF	Lowellville	OH	520	MSW
cfs	Victoria	VA	88	MSW
Fitchburg LF	Westminister	MA	1,890	MSW
Middleborough Landfill	Middleborough	MA	688	MSW
NBWS	New Bedford	MA	844	MSW
Ricova international	Detriot	MI	86	MSW
Taunton Landfill	Taunton	MA	246	MSW

Divert + Dispose = 14,187 (Divert+Dispose) - Accept: -5,063 % Difference: -26.30%

Municipality	*Region*	*Reg Obj Name and Address*	
SANDWICH	SE	NEW BEDFORD WASTE SERVICES LLC SANDWICH	*Receipt Status:* **Rec'd 2/10/2020**
Reg Obj Acct: 308543		295 SERVICE RD	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 23,092 | 23,092 | Check Accepted: **OK** | OpenDays: 253

Waste/Material Type	State	Tons
C&D Waste	MA	21,740
General Recyclables	MA	1,342
Asphalt Brick Concrete	MA	10

Diverted: 7,065

Vendor/End User	Town	State	Tons	Material Type
casella charlestown	Charlestown	MA	756	General Recyclables
Mid City Scrap	Westport	MA	98	General Recyclables
nbws	New Bedford	MA	4,469	C&D Waste
NE RECYLING	Taunton	MA	184	C&D Waste
Patriot Disposal	Johnston	RI	953	C&D Waste
STOUGHTON RECYCLING	Stoughton	MA	26	C&D Waste
zero waste	Rochester	MA	579	General Recyclables

Disposed: 15,624

Disposal Site Name	Town	State	Tons	Waste Type
Champion City	Brockton	MA	15,624	C&D Waste

Divert + Dispose = 22,689 (Divert+Dispose) - Accept: -403 % Difference: -1.75%

SANDWICH	SE	UPPER CAPE REGIONAL TRANSFER STATION	*Receipt Status:* **Rec'd 2/12/2020**
Reg Obj Acct: 329412		GENERALS BLVD	*Class:* LGTRAN - Large Transfer Station

Accepted: 19,675 | 19,675 | Check Accepted: **OK** | OpenDays: 306

Waste/Material Type	State	Tons
MSW	MA	107
C&D Waste	MA	12,439
Bulky Waste	MA	5,759
Cardboard	MA	400
Asphalt Brick Concrete	MA	970

Diverted: 2,881

Vendor/End User	Town	State	Tons	Material Type
carney	Raynham	MA	5	Gypsum
cavossa	Falmouth	MA	970	Asphalt Brick Concrete
Mid City Scrap	Everett	MA	490	Metals
Mid City Scrap	Westport	MA	609	Cardboard
NER	Taunton	MA	807	Wood Waste

Disposed: 16,794

Disposal Site Name	Town	State	Tons	Waste Type
LAFARGE	Lordstown	OH	11,681	C&D Waste
pine avenue landfill	Niagara Falls	NY	5,006	C&D Waste
SEMASS	Rochester	MA	107	MSW

Divert + Dispose = 19,675 (Divert+Dispose) - Accept: 0 % Difference: 0.00%

Municipality	*Region*	*Reg Obj Name and Address*	
SPRINGFIELD	WE	FP MCNAMARA TRANSFER STATION	*Receipt Status:* **Rec'd 1/21/2020**
Reg Obj Acct: 418670		44 ROSE ST	*Class:* LGTRAN - Large Transfer Station

Accepted: 73,730 | 73,730 | Check Accepted: **OK** | OpenDays: 304

Waste/Material Type	State	Tons
MSW	MA	65,456
C&D Waste	MA	1,518
General Recyclables	MA	6,756

Diverted: 6,677

Vendor/End User	Town	State	Tons	Material Type
Bobs Tire	Mattapoisett	MA	67	Tires
casella	Auburn	MA	6,444	General Recyclables
Northstar	Springfield	MA	108	Cardboard
SuLLIVAN	Holyoke	MA	58	Metals

Disposed: 67,785

Disposal Site Name	Town	State	Tons	Waste Type
CASELLA	Holyoke	MA	1,111	C&D Waste
Chicopee Landfill	Chicopee	MA	8,776	MSW
rail	Lee County	SC	50,276	MSW
Wheelabrator	Millbury	MA	4,575	MSW
wm fitchburg	Fitchburg	MA	3,047	MSW

Divert + Dispose = 74,462 (Divert+Dispose) - Accept: 732 % Difference: 0.99%

STOUGHTON	SE	STOUGHTON RECYCLING TECHNOLOGIES	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 172972		100 PAGE ST	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 94,642 | 94,642 | Check Accepted: **OK** | OpenDays: 249

Waste/Material Type	State	Tons
C&D Waste	MA	61,317
Bulky Waste	MA	28,076
Asphalt Brick Concrete	MA	36
Wood C&D	MA	5,213

Diverted: 46,980

Vendor/End User	Town	State	Tons	Material Type
Attleboro LF	Attleboro	MA	26	Fines C&D
C&D Tires	New Bedford	MA	10	Tires
casella	Boston	MA	278	Cardboard
Champion City	Brockton	MA	13	Gypsum
Champion City	Brockton	MA	16,581	Asphalt Brick Concrete
East Coast Computer Recycling	Shirley	MA	4	Electronics/Computers
MJM CONSTRUCTION	Brockton	MA	3,782	Asphalt Brick Concrete
multiple metal recyclers	Various	MA	3,559	Metals
New England Recycling	Taunton	MA	2,338	Asphalt Brick Concrete
Patriot Recycling	Raynham	MA	28	Asphalt Brick Concrete
TAFISA	Lac-Megantic	QC	20,029	Wood C&D
Waste management	Avon	MA	332	Cardboard

Disposed: 49,577

Disposal Site Name	Town	State	Tons	Waste Type
Champion City	Brockton	MA	42,670	Residuals C&D
Champion City	Brockton	MA	4,835	Fines C&D
Wheelabrator	Millbury	MA	2,072	Residuals C&D

Divert + Dispose = 96,557 (Divert+Dispose) - Accept: 1,915 % Difference: 2.02%

Municipality	*Region*	*Reg Obj Name and Address*	
TAUNTON	SE	NEW ENGLAND RECYCLING CO INC	*Receipt Status:* **Rec'd 2/6/2020**
Reg Obj Acct: 301481		569 WINTHROP ST	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 128,550

Waste/Material Type	State	Tons
C&D Waste	MA	126,741
Bulky Waste	MA	1,809

128,550 Check Accepted: **OK** OpenDays: 304

Diverted: 44,727

Vendor/End User	Town	State	Tons	Material Type
Allied	Walpole	MA	131	Metals
banyan plastics	Troy	AL	226	Plastics
BFI	Brockton	MA	245	Cardboard
carney	Raynham	MA	84	Gypsum
carney	Raynham	MA	227	Shingles Asphalt
casella	Bethlehem	NH	3,796	Residuals C&D
Clean Harbors	Portland	ME	229	Wood C&D
coventry landfil	Coventry	RI	522	Fines C&D
cyn environmental	Stoughton	MA	246	Wood Waste
EXCEL	Charlton	MA	47	Metals
F&B Rubberized	Littleton	MA	274	Tires
full circle recycling	Johnston	RI	360	Metals
Future Fuel	Taunton	MA	3,428	Wood Waste
jr vinagro corp	Johnston	RI	625	C&D Waste
jr vinagro corp	Johnston	RI	694	Asphalt Brick Concrete
lopes construction	Raynham	MA	49	Wood Waste
lopes construction	Raynham	MA	4,121	Asphalt Brick Concrete
Norridgewock LF	Norridgewock	ME	116	Residuals C&D
Plainfield power	Plainfield	CT	7,288	Wood C&D
Sappi	Westbrook	ME	3,970	Wood C&D
Scrap X	Providence	RI	56	Metals
TAFISA	Lac-Megantic	QC	6,430	Wood C&D
tauton scrap metal	Tauton	MA	4,972	Metals
tradebe environmental	Bridgeport	CT	4,001	Wood C&D
tradebe environmental	Stoughton	MA	1,222	Wood Waste
tradebe environmental	Newington	NH	1,347	Wood C&D
United Material Management	Millbury	MA	21	C&D Waste

Disposed: 83,421

Disposal Site Name	Town	State	Tons	Waste Type
new england waste	Taunton	MA	62,547	Residuals C&D
new england waste	Taunton	MA	20,665	Fines C&D
Norridgewock Landill	Norridgewock	ME	209	Residuals C&D

Divert + Dispose = 128,148 (Divert+Dispose) - Accept: -402 % Difference: -0.31%

TAUNTON	SE	NEW ENGLAND WASTE DISPOSAL INC	*Receipt Status:* **Pending**
Reg Obj Acct: 586446		101 PRINCE HENRY DR	*Class:* LGTRAN - Large Transfer Station

Accepted:

Check Accepted: OpenDays:

Diverted:

Disposed:

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*	
WARE	WE	REENERGY WARE	*Receipt Status:* **Rec'd 2/11/2020**
Reg Obj Acct: 377540		198 EAST ST	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 121,284 | 121,284 | Check Accepted: **OK** | OpenDays: 257

Waste/Material Type	State	Tons
C&D Waste	MA	1,878
Bulky Waste	MA	18
Metals	MA	277
Asphalt Brick Concrete	MA	503
Residuals C&D	MA	118,608

Diverted: 3,857

Vendor/End User	Town	State	Tons	Material Type
BoBbs Tire	Fall River	MA	2	Tires
Complete Recycling Solutions	Fall River	MA	5	Electronics/Computers
ercc	Epping	NH	45	Wood C&D
EXCEL	Charlton	MA	36	Metals
George Apkins &Sons	North Adams	MA	33	Metals
LL & S	Salem	NH	1	Plastics
LL & S	Salem	NH	186	Metals
McConnel Enterprises	Braintree	MA	13	Metals
RE Energy	Ware	MA	3,500	Asphalt Brick Concrete
SCHNITZER	Worcester	MA	36	Metals

Disposed: 122,098

Disposal Site Name	Town	State	Tons	Waste Type
Sunny Farms Landfill	Fostoria	OH	122,098	Residuals C&D

Divert + Dispose = 125,955 (Divert+Dispose) - Accept: 4,671 % Difference: 3.85%

WEBSTER	CE	WEBSTER TRANSFER STATION	*Receipt Status:* **Pending**
Reg Obj Acct: 40035		15 CUDWORTH RD	*Class:* LGTRAN - Large Transfer Station

Accepted: | | Check Accepted: | OpenDays:

Diverted:

Vendor/End User	Town	State	Tons	Material Type
Beaupre Scrap	Worcester	MA		Metals
Cohen Rags	Worcester	MA		Textiles/Clothing
East Coast Electronics Recyclin	Leominister	MA		Electronics/Computers
Willimantic Waste Paper	Willimantic	CT		General Recyclables

Disposed:

Disposal Site Name	Town	State	Tons	Waste Type
Wheelabrator	Lisbon	CT		MSW
Wheelabrator Millbury	Millbury	MA		MSW

Divert + Dispose = 0 (Divert+Dispose) - Accept: % Difference:

Municipality	*Region*	*Reg Obj Name and Address*	
WELLESLEY	NE	WELLESLEY TRANSFER STATION	*Receipt Status:* **Rec'd 2/12/2020**
Reg Obj Acct: 173057		169 GREAT PLAIN AVE	*Class:* LGTRAN - Large Transfer Station

Accepted: 15,241

Waste/Material Type	State	Tons
MSW	MA	4,759
C&D Waste	MA	2,781
Tires	MA	11
Other (NonMSW)	MA	129
General Recyclables	MA	2,422
Compostables/Organics	MA	3,417
Metals	MA	431
Asphalt Brick Concrete	MA	230
Electronics/Computers	MA	48
Wood C&D	MA	1,013

15,241 Check Accepted: **OK** OpenDays: 335

Diverted: 7,666

Vendor/End User	Town	State	Tons	Material Type
360 recycling llc	Wesfield	MA	824	Compostables/Organics
AlllED RECYCLING	Walpole	MA	3	General Recyclables
AlllED RECYCLING	Walpole	MA	420	Metals
American Fiber	Smyrna	GA	110	General Recyclables
American Red Cross	Boston	MA	40	Textiles/Clothing
autism services assoc.	Wellesley	MA	7	Textiles/Clothing
Bay State Textile	Marston Mills	MA	8	Textiles/Clothing
benefit box company	Brighton	MA	6	Textiles/Clothing
blackbridge investments	Huntington	NY	20	General Recyclables
BoBbs Tire	Fall River	MA	11	Tires
boston Premier Flooring	Wellesley	MA	4	Wood Waste
Cans and Bottle REDEMPTION	Milford	MA	16	General Recyclables
CANUSA HERSHMAN RECYCL	Branford	CT	86	General Recyclables
caviccio greenhouse inc	Sudbury	MA	1,178	Compostables/Organics
CELL PHONES FOR SOLDIER	Boston	MA	1	General Recyclables
charles river landscape	Holliston	MA	1	Textiles/Clothing
Cook and Company	Upton	MA	961	Compostables/Organics
earth connections	Framingham	MA	292	Compostables/Organics
EL Harvey	Westborough	MA	948	Wood C&D
EL Harvey	Westborough	MA	9	General Recyclables
lions club	Natick	MA	1	General Recyclables
More Than Words	Waltham	MA	13	General Recyclables
Morgan Memorial	Boston	MA	58	Textiles/Clothing
Norhstarpulp and paper Co	Springfield	MA	23	General Recyclables
Northeast Resource Recovery	Epsom	NH	215	General Recyclables
norwood bottled gas	Norwood	MA	3	Metals
other	Various	MA	1	General Recyclables
other	Various	MA	58	Compostables/Organics
Patriot Recycling	Raynham	MA	65	Wood C&D
Patriot Recycling	Raynham	MA	8	Gypsum
Patriot Recycling	South Easton	MA	100	General Recyclables
Planet Aid	Holliston	MA	10	Textiles/Clothing
SAVE THAT STUFF	Charlestown	MA	100	Compostables/Organics
SAVE THAT STUFF	Charlestown	MA	1,764	General Recyclables
trigon plastics	New Holland	PA	45	General Recyclables
UnIVERSAL COMMODITY SER	Brooklyn	NY	19	General Recyclables
Waste management	Phoenix	AZ	8	Metals
wellesley	Wellesley	MA	230	Asphalt Brick Concrete

Disposed: 7,540

Disposal Site Name	Town	State	Tons	Waste Type
Fitchburg LF	Fitchburg	MA	2,781	C&D Waste
Fitchburg LF	Fitchburg	MA	4,759	MSW

Divert + Dispose = 15,206 (Divert+Dispose) - Accept: -35 % Difference: -0.23%

WEST SPRINGFIELD WE WEST SPRINGFIELD TRANSFER STATION *Receipt Status:* **Rec'd 2/10/2020**

Reg Obj Acct: 527259 138 PALMER AVE *Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 80,123

Waste/Material Type	State	Tons
MSW	MA	35,684
C&D Waste	MA	23,344
Bulky Waste	MA	21,095

80,123 Check Accepted: **OK** OpenDays: 307

Diverted: 7,910

Vendor/End User	Town	State	Tons	Material Type
kane Metal	Chicopee	MA	511	Metals
kudlic construction	West Springfield	MA	316	Asphalt Brick Concrete
Pre-Greenleaf	Plainfield	CT	2,153	Wood C&D
Recycle America	Springfield	MA	3	Plastics
Seneca Meadows Landfill	Seneca Meadows	NY	3,878	Fines C&D
Sonoco	Holyoke	MA	66	Cardboard
willamansett waste	Chicopee	MA	14	Metals
WTE Recycling	Greenfield	MA	969	Metals

Disposed: 72,187

Disposal Site Name	Town	State	Tons	Waste Type
clinton county lf	Morrisonville	NY	793	MSW
Covanta	Agawam	MA	14	Wood C&D
dunn landfill	Rensellaer	NY	21,004	Residuals C&D
fulton county	Johnston	NY	5,849	MSW
Ontario County Landfill	Stanley	NY	192	MSW
Seneca Meadows Landfill	Seneca Falls	MA	44,335	MSW

Divert + Dispose = 80,097 (Divert+Dispose) - Accept: -26 % Difference: -0.03%

Municipality	*Region*	*Reg Obj Name and Address*	
WESTBOROUGH	CE	EL HARVEY C&D PROCESSING FACILITY	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 12		68 HOPKINTON RD	*Class:* CDLG - Large C&D Waste Processing Facility

Accepted: 108,187 | 108,187 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
C&D Waste	MA	84,632
Bulky Waste	MA	13,270
Metals	MA	988
Asphalt Brick Concrete	MA	670
Wood C&D	MA	8,627

Diverted: 71,671

Vendor/End User	Town	State	Tons	Material Type
carney	S.Easton	MA	334	Shingles Asphalt
carver LF	Carver	MA	6,220	Fines C&D
Clinton Landfill	Clinton	MA	19,404	C&D Waste
CTI Douglas	Douglas	MA	834	Asphalt Brick Concrete
fbs tire recycling	Mattapoisett	MA	58	Tires
Framingham Salvage	Framingham	MA	8,780	Metals
Kruger	Bromptonville	QC	7,633	Wood Waste
Mass Natural	Westminster	MA	1,468	Asphalt Brick Concrete
New Bedford LF	New Bedford	MA	1,059	Fines C&D
Seneca Meadows Landfill	Seneca Meadows	NY	12,490	Fines C&D
TAFISA	Lac-Megantic	QC	13,298	Wood Waste
USA GYPSUM	Denver	PA	93	Gypsum

Disposed: 36,516

Disposal Site Name	Town	State	Tons	Waste Type
Fitchburg LF	Fitchburg	MA	10,153	Residuals C&D
Fitchburg LF	Fitchburg	MA	13,270	Bulky Waste
Various	Various	VA	13,093	Residuals C&D

Divert + Dispose = 108,187 (Divert+Dispose) - Accept: 0 % Difference: 0.00%

WESTBOROUGH	CE	EL HARVEY TRANSFER & RECYCLING FACILITY	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 173212		68 HOPKINTON RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 84,912 | 84,912 | Check Accepted: **OK** | OpenDays: 307

Waste/Material Type	State	Tons
General Recyclables	MA	84,912

Diverted: 60,481

Vendor/End User	Town	State	Tons	Material Type
EL Harvey	Hopkinton	MA	60,481	General Recyclables

Disposed: 24,889

Disposal Site Name	Town	State	Tons	Waste Type
Various	Various	NY	16,389	Contaminated Soil
Various	Various	NY	4,250	MSW
Wheelabrator Millbury	Millbury	MA	4,250	MSW

Divert + Dispose = 85,370 (Divert+Dispose) - Accept: 458 % Difference: 0.54%

Municipality	*Region*	*Reg Obj Name and Address*		
WESTMINSTER	CE	FITCHBURG SW CONVENIENCE CTR & COMPOST	*Receipt Status:*	**Rec'd 2/24/2020**
Reg Obj Acct: 394210		101 FITCHBURG RD	*Class:*	CMPOST - Site Assigned Compost Facility

Accepted: 8,881 | 8,881 | Check Accepted: **OK** | OpenDays: 286

Waste/Material Type	State	Tons
MSW	MA	2,566
Wood Waste	MA	1,517
C&D Waste	MA	226
Tires	MA	2
Other (NonMSW)	MA	3,137
Bulky Waste	MA	6
General Recyclables	MA	183
Compostables/Organics	MA	211
Cardboard	MA	161
Metals	MA	226
Newspaper	MA	114
Electronics/Computers	MA	11
Sludge (Paper)	MA	521

Diverted: 10,054

Vendor/End User	Town	State	Tons	Material Type
EL Harvey	Fitchburg	MA	114	Newspaper
EL Harvey	Fitchburg	MA	161	Cardboard
EL Harvey	Fitchburg	MA	183	General Recyclables
EL Harvey	Fitchburg	MA	226	C&D Waste
Electronic Recyclers	Holliston	MA	11	Electronics/Computers
Fitchburg/Westminster LF	Westminster	MA	9,126	Compostables/Organics
INTERSTATE BATTERY	Tyngsborough	MA	4	Metals
interstate refridgerant recovery	Everett	MA	6	Metals
LIBERTY TIRE	Littleton	MA	2	Tires
MiGHTY FLAME	Rindge	NH	1	Metals
SCHNITZER	Everett	MA	220	Metals

Disposed: 2,566

Disposal Site Name	Town	State	Tons	Waste Type
RCI FITCHBURG LF	Fitchburg	MA	2,566	MSW

Divert + Dispose = 12,620 (Divert+Dispose) - Accept: 3,739 % Difference: 42.10%

Municipality	*Region*	*Reg Obj Name and Address*	
WILBRAHAM	WE	WESTERN RECYCLING	*Receipt Status:* **Rec'd 2/4/2020**
Reg Obj Acct: 291801		120 OLD BOSTON RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 121,124

Waste/Material Type	State	Tons
MSW	CT	10,583
MSW	MA	24,541
C&D Waste	CT	73
C&D Waste	MA	2,847
Sludge (WWTP)	MA	753
Bulky Waste	CT	892
Bulky Waste	MA	35,310
Bulky Waste	VT	693
General Recyclables	CT	1
General Recyclables	MA	2,897
Fines C&D	CT	1,269
Fines C&D	MA	5,049
Residuals C&D	MA	32,957
Shingles Asphalt	CT	57
Shingles Asphalt	MA	3,202

121,124 Check Accepted: **OK** OpenDays: 304

Diverted: 5,487

Vendor/End User	Town	State	Tons	Material Type
automated material	Berlin	CT	599	General Recyclables
babylon Recycling center	Suffield	CT	7	General Recyclables
Capitol Recycling	Hartford	CT	2,323	General Recyclables
EXCEL	Charlton	MA	147	Metals
F&G Recycling	East Windsor	CT	2,339	C&D Waste
metal management	North Haven	CT	72	Metals

Disposed: 36,205

Disposal Site Name	Town	State	Tons	Waste Type
clinton county lf	Morrisonville	NY	35	MSW
Covanta	Pittsfield	MA	10,782	MSW
Wheelabrator	Hudson Falls	NY	5,980	MSW
Wheelabrator	Millbury	MA	14,666	MSW
WM chicopee	Chicopee	MA	2,515	MSW
wm green ridge	Ganesvoort	NY	2,227	MSW

Divert + Dispose = 41,692 (Divert+Dispose) - Accept: -79,432 % Difference: -65.58%

Municipality	*Region*	*Reg Obj Name and Address*	
WINCHESTER	NE	WINCHESTER TRANSFER STATION	*Receipt Status:* **Rec'd 2/14/2020**
Reg Obj Acct: 173111		15 MCKAY AVE	*Class:* LGTRAN - Large Transfer Station

Accepted: 18,407

Waste/Material Type	State	Tons
MSW	MA	9,206
Wood Waste	MA	3,205
C&D Waste	MA	307
Tires	MA	4
General Recyclables	MA	1,486
Compostables/Organics	MA	53
Textiles/Clothing	MA	90
Metals	MA	331
Asphalt Brick Concrete	MA	107
Household Haz Waste	MA	1
Electronics/Computers	MA	37
Swap Shop	MA	78
Mulch	MA	3,500
Mattresses	MA	2

18,407 Check Accepted: **OK** OpenDays: 260

Diverted: 5,352

Vendor/End User	Town	State	Tons	Material Type
Bay State Textile	Pembroke	MA	2	Textiles/Clothing
BoBbs Tire	Fall River	MA	4	Tires
discover books	Attleboro	MA	5	Newspaper
graniteville	Westford	MA	107	Asphalt Brick Concrete
JRM Recycling	Peabody	MA	1,486	General Recyclables
Landscape Express	Woburn	MA	50	Compostables/Organics
mayer tree service	Essex	MA	3,205	Wood Waste
More Than Words	Boston	MA	18	Newspaper
Planet Aid	Holliston	MA	8	Textiles/Clothing
RECYCLE THAT, LLC	Federal Heights	CO	8	Textiles/Clothing
Red Cross	Peabody	MA	25	Textiles/Clothing
RMG	Londonderry	NH	37	Electronics/Computers
St Vincent de Paul	Woburn	MA	14	Textiles/Clothing
Swap Shop	Winchester	MA	50	Other (NonMSW)
TURNER STEEL	Lynn	MA	331	Metals
UTEC	Lowell	MA	2	Mattresses

Disposed: 9,513

Disposal Site Name	Town	State	Tons	Waste Type
Covanta	Haverhill	MA	9,513	MSW

Divert + Dispose = 14,865 (Divert+Dispose) - Accept: -3,542 % Difference: -19.24%

Municipality	*Region*	*Reg Obj Name and Address*	
WORCESTER	CE	MASSACHUSETTS MATERIALS MANAGEMENT	*Receipt Status:* **Rec'd 2/13/2020**
Reg Obj Acct: 511231		2 KANSAS ST	*Class:* SMHNDL - Small Handling Facility

Accepted: 5,963 | 5,963 Check Accepted: **OK** OpenDays: 307

Waste/Material Type	State	Tons
MSW	MA	3,618
General Recyclables	MA	2,345

Diverted: 2,340

Vendor/End User	Town	State	Tons	Material Type
Beaupre Scrap	Worcester	MA	598	Metals
central mass landscapes	Worcester	MA	2	Compostables/Organics
East Coast Computer Recycling	Portsmouth	NH	7	Electronics/Computers
empire tire	Plainville	CT	233	Tires
f&D trucking	Millbury	MA	507	Metals
habitat for humanity	Worcester	MA	80	General Recyclables
Rand-Whitney Recycling	Worcester	MA	24	Newspaper
Rand-Whitney Recycling	Worcester	MA	193	Cardboard
south worcester clothing	Worcester	MA	20	Textiles/Clothing
troiano trucking	Grafton	MA	46	Compostables/Organics
United Material Management	Millbury	MA	210	Wood C&D
urban missionaries of our lady of	Worcester	MA	160	General Recyclables
Various	Various	CN	210	Wood Waste
worcester sand and gravel	Shrewsbury	MA	50	Asphalt Brick Concrete

Disposed: 3,618

Disposal Site Name	Town	State	Tons	Waste Type
united materials management	Millbury	MA	3,618	MSW

Divert + Dispose = 5,958 (Divert+Dispose) - Accept: -5 % Difference: -0.08%

YARMOUTH	SE	YARMOUTH BARNSTABLE REG TRANSFER STATION	*Receipt Status:* **Rec'd 3/13/2020**
Reg Obj Acct: 329275		50 WORKSHOP RD	*Class:* LGTRAN - Large Transfer Station

Accepted: 89,240 | 89,240 Check Accepted: **OK** OpenDays: 350

Waste/Material Type	State	Tons
MSW	MA	88,771
General Recyclables	MA	469

Diverted: 451

Vendor/End User	Town	State	Tons	Material Type
EL Harvey	Westborough	MA	447	General Recyclables
Mid City Scrap	Westport	MA	4	Metals

Disposed: 88,717

Disposal Site Name	Town	State	Tons	Waste Type
SEMASS	Rochester	MA	88,717	MSW

Divert + Dispose = 89,168 (Divert+Dispose) - Accept: -72 % Difference: -0.08%

Municipality	*Region*	*Reg Obj Name and Address*		
YARMOUTH	SE	YARMOUTH TRANSFER STATION	*Receipt Status:*	**Rec'd 2/15/2020**
Reg Obj Acct: 266530		606 FOREST RD	*Class:*	LGTRAN - Large Transfer Station

Accepted: 28,586 | 28,586 | Check Accepted: **OK** | OpenDays: 354

Waste/Material Type	State	Tons
MSW	MA	8,428
Wood Waste	MA	2,517
C&D Waste	MA	15,220
Tires	MA	47
Other (NonMSW)	MA	33
General Recyclables	MA	460
Compostables/Organics	MA	52
Textiles/Clothing	MA	75
Mixed Paper	MA	762
Metals	MA	712
Household Haz Waste	MA	30
Electronics/Computers	MA	83
Mattresses	MA	167

Diverted: 20,157

Vendor/End User	Town	State	Tons	Material Type
A&P Enterprises	Berkley	MA	83	Electronics/Computers
A&P Enterprises	Berkley	MA	6	Metals
ACE Mattress Recycling	West Warwick	RI	167	Mattresses
Bay State	New Bedford	MA	6	Textiles/Clothing
best buy beverages	Mashpee	MA	29	General Recyclables
CRT Inc	Tauton	MA	1	General Recyclables
discover books	Pawtucket	RI	33	Mixed Paper
EL Harvey	Westborough	MA	460	General Recyclables
EXCEL	Westport	MA	349	Metals
F&B Rubberized	New Bedford	MA	47	Tires
Goodwill Industries	Boston	MA	21	Textiles/Clothing
intercity battery	Yarmouth	MA	30	Household Haz Waste
mayer tree services	Essex	MA	453	Wood Waste
Mid City Scrap	Westport	MA	357	Metals
Mid City Scrap	Westport	MA	577	General Recyclables
MiGHTY FLAME	Rindge	ME	2	Metals
Miller Recycling Corp	Westport	MA	152	General Recyclables
New England Recycling	Taunton	MA	15,220	C&D Waste
New England Recycling	Taunton	MA	1,003	Wood Waste
Red Cross	Boston	MA	33	Textiles/Clothing
Robert Childs Inc	South Dennis	MA	348	Wood Waste
S&J Exco	Dennis	MA	713	Wood Waste
Salvation Army	Boston	MA	15	Textiles/Clothing
TW Nickerson	Chatam	MA	52	Compostables/Organics

Disposed: 8,428

Disposal Site Name	Town	State	Tons	Waste Type
Yarmouth-Barnstable TS	Yarmouth	MA	8,428	MSW

Divert + Dispose = 28,585 (Divert+Dispose) - Accept: -1 % Difference: 0.00%

Report Summary

Number of Annual Reports Listed: 77

EXHIBIT 2

clf
conservation law foundation

For a thriving New England

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Joint Environmental Comments on Proposed Changes to Waste Incineration Regulations in the Renewable Energy Portfolio Standard (225 C.M.R. 14.00 and 225 C.M.R. 15.00)

Conservation Law Foundation; Global Alliance for Incinerator Alternatives; Acadia Center; Alliance for Health and Environment; Berkshire Environmental Action Team; Clean Water Action; Climate Action Now Western Massachusetts; Cooperative Energy, Recycling, and Organics; Environmental League of Massachusetts; Institute for Local Self Reliance; Massachusetts Sierra Club; MASSPIRG; No Fracked Gas in Mass; Partnership for Policy Integrity; Sustainable Wellesley; Toxics Action Center; Judith Enck, founder Beyond Plastics, former EPA Regional Administrator; Mike Ewall, Esq., Executive Director Energy Justice Network

Thank you for the opportunity to provide comments regarding the proposed changes to Massachusetts' Renewable Portfolio Standard ("RPS") Class I and RPS Class II Regulations. These comments were prepared by the Conservation Law Foundation ("CLF")[1] and are being submitted on behalf of the groups and individuals listed above (collectively "Commenters").

In the RPS Class II "waste-to-energy" section of the proposed changes, DOER proposes increasing the amount of energy our utilities must purchase from qualifying facilities from 3.5% to 3.7% for 2019 through 2025. DOER also proposes increasing the RPS Class II waste-to-energy rate to align with the RPS Class II Renewable Energy alternative compliance rate, effective this year.

The Commenters oppose both the proposed increase in energy to be purchased from incinerators, and proposed increase in rate because:

1) Incinerators do not produce renewable energy, and should not benefit from programs meant to support renewable energy;

2) Incinerators' toxic emissions and ash are bad for the environment, public health, and the economy;

[1] Portions of these comments were previously published on CLF's website in a blog post authored by Ahmina Maxey, the U.S. and Canada Regional Coordinator with Global Alliance for Incinerator Alternatives. *See* Ahmina Maxey, What's Wrong with Burning Our Trash, Anyway? So very, very much, https://www.clf.org/blog/whats-wrong-with-burning-our-trash-anyway/.

conservation law foundation

3) Incinerators in Massachusetts are disproportionately located in already overburdened Environmental Justice Communities;

4) The RPS should not be adjusted to prop up and extend the life of outdated, aging incinerators;

5) Incinerators are more expensive and provide fewer jobs than the alternatives;

6) Any changes to the RPS should be made after the 2020-2030 Solid Waste Master Plan is adopted.

RPS and programs like it are meant to support and stimulate the sustainable energy field and to protect the environment, yet as analyzed in a recent Boston College Law Review article, incineration is neither economically sound nor environmentally sustainable:[2]

> Because [Waste-To-Energy] superficially appears to be renewable, it was able to become a thriving industry by taking government subsidies that should have been reserved for wind, solar, and geothermal energy. Thus this "dirty" industry has continued to benefit under federal and state programs, while they simultaneously expel persistent, bioaccumulative toxics into the environment.[3]

1. Incinerators do not produce renewable energy, and should not benefit from programs meant to support renewable energy.

Incineration, often referred to as "waste-to-energy" by the industry, is a high-heat waste treatment technology that involves burning municipal solid waste ("MSW"), a.k.a. the combination of commercial, residential, and industrial wastes. Massachusetts' MSW comprises primarily food, yard waste, cardboard, paper, textiles, metals, glass, construction and demolition materials, plastics, household hazardous waste, and electronics.[4] High-heat incineration converts these materials into bottom ash, fly ash, combustion gases, air pollutants, wastewater, wastewater treatment sludge, and heat.

Muncipal Solid Waste comprises many materials that are not "renewable." Incineration of MSW that contains fossil fuels, such as plastics and rubber, releases the bound carbon stored in those

[2] Hale McAnulty, *A Dirty Waste – How Renewable Energy Policies Have Financed the Unsustainable Waste-To-Energy Industry*, 60 B.C.L. Rev. 385 (2019), https://lawdigitalcommons.bc.edu/bclr/vol60/iss1/9.
[3] *Id.* at 412.
[4] *See* Massachusetts DEP, Overall Waste Composition By Primary Material Category—Winter and Fall 2016 Sampling, https://www.mass.gov/doc/summary-of-waste-combustor-class-ii-recycling-program-waste-characterization-studies-includes/download.

fossil fuels.[5] According to the U.S. Environmental Protection Agency ("EPA"), in 2016, MSW incineration released 11.0 million metric tons of carbon dioxide equivalent ("CO_2e") greenhouse gases.[6] Per unit of electricity generated, waste incineration emits more carbon dioxide (2,988 lbs/MWh) than coal-fired power plants (2,249 lbs/MWh).[7]

Moreover, according to EPA, zero waste practices such as source reduction, recycling, and composting provide a significant net life-cycle reduction in greenhouse gas emissions compared to incineration.[8] And in fact, these zero waste practices conserve significantly more energy than can be generated via incineration.[9] Source reduction, recycling, and composting can conserve three to five times more energy, per ton of waste, than can be generated by incinerating that same ton of waste.[10] Tellus Institute, in its "Assessment of Materials Management Options for the Massachusetts Solid Waste Master Plan Review" submitted to the Massachusetts Department of Environmental Protection ("DEP"), estimated that waste diversion through recycling saves 1,665 kWh over incineration per ton of solid waste.[11] According to another estimate, the amount of energy wasted by not recycling aluminum and steel cans, paper, printed materials, glass, and plastic equals the annual output of 15 medium-sized power plants.[12]

In 2016, more than 70% of the MSW incinerated in Massachusetts was paper, plastic, metal, glass, or organic material,[13] most of which could have been recycled or composted. In terms of

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[5] Tellus Institute, Assessment of Materials Management Options for the Massachusetts Solid Waste Master Plan Review 9, 11 (2008), https://www.tellus.org/pub/Final_Report-Materials_Management_Options_for_MA_SW_Master_Plan_Review_-_With_Appendices_-_12-08.pdf. *See also* U.S. EPA, Solid Waste Management and Greenhouse Gases, a Life-Cycle Assessment of Emissions and Sinks 76 (3d ed. 2006) ("Combustion of plastics results in substantial net [greenhouse gas] emissions. . . . This result is primarily because of the high content of nonbiomass carbon in plastics.").

[6] EPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990–2016, 3-51–3-53 (2018).

[7] Morris, Jeffrey, Bury or Burn North America MSW? LCAs Provide Answers for Climate Impacts & Carbon Neutral Power Potential, Environmental Science & Technology, Volume 44, NO. 20, September, 2010. *See also* Energy Justice Network, Trash Incineration More Polluting Than Coal, http://www.energyjustice.net/incineration/worsethancoal (when "biogenic" emissions are included in the calculus, incineration releases carbon dioxide "at a rate 2.5 times that of coal power plants").

[8] U.S. EPA, *supra* note 5, at 116–19.

[9] Marie Donahue, Institute for Local Self-Reliance, Waste Incineration: A Dirty Secret in How States Define Renewable Energy 11 (2018), https://ilsr.org/wp-content/uploads/2018/12/ILSRIncinerationFInalDraft-6.pdf.

[10] *Id.*

[11] Tellus Institute, *supra* note 5, at 3, 51–52.

[12] Recycling Investment Saves Energy, S. 3654, 109th Cong. § 2 (2006).

[13] *See* Massachusetts DEP, *supra* note 4.

greenhouse gas generation and energy production, even rudimentary zero waste alternatives are far more advantageous than using these materials to generate non-renewable energy.[14]

2. Incinerators' toxic emissions and ash are bad for the environment, public health, and the economy.

Waste incineration not only emits greenhouse gases at a much higher rate than other non-renewable energy sources, but it also releases significant levels of toxic pollutants to nearby communities. On average, to produce the same amount of energy as a coal power plant, waste incinerators release:

- 28 times as much dioxin;
- twice as much carbon monoxide;
- three times as many nitrogen oxides;
- 6–14 times as much mercury;
- nearly six times as much lead; and
- 70% more sulfur dioxides.[15]

Incinerators are also significant sources of particulate matter emissions.[16] Inhalation of particulate matter, from a variety of sources, has been linked to respiratory and cardiovascular problems and may cause approximately 2 million excess deaths worldwide each year.[17] And a 2011 study published in the *American Economic Review* found that among U.S. industries, waste incineration has the highest ratio of negative economic impacts from air pollution compared to the financial value added by the industry.[18]

[14] *See* Tellus Institute, *supra* note 5, at 1 ("From a lifecycle environmental emissions and energy perspective, source reduction, recycling, and composting are the most advantageous management options for all (recyclable/compostable) materials in the waste stream.").
[15] Energy Justice Network, *supra* note 7; *see also* Environmental Integrity Project, Dirtying Maryland's Air by Seeking a Quick Fix on Renewable Energy? 3–8 (2011), http://www.environmentalintegrity.org/wp-content/uploads/2016/11/FINALWTE INCINERATORREPORT-101111.pdf (Maryland's two major incinerators release mercury, lead, nitrogen oxides, and carbon monoxide at significantly higher rates than Maryland's four coal-fired power plants).
[16] The New School, U.S. Municipal Solid Waste Incinerators: An Industry in Decline 34 (2019), https://tishmancenter.org/wp-content/uploads/2019/05/CR_GaiaReportFinal_05.21.pdf.
[17] Howard, C. Vyvyan, Statement of Evidence, Particulate Emissions and Health, Proposed Ringaskiddy Waste-to-Energy Facility 4–5 (2009).
[18] Muller, Nicholas Z., Robert Mendelsohn, and William Nordhaus, 101 Environmental Accounting for Pollution in the United States Economy, American Economic Review 5, 1649, 1664–69 (2011).

Some newer incinerators are equipped with air pollution control devices such as air filters, but these filters do not efficiently prevent the escape of ultrafine particular matter.[19] And in any event, filters do not eliminate pollutants; they merely capture those pollutants and transfer them to incinerator by-products such as ash and wastewater treatment sludge.[20]

Incineration is often touted as a landfill alternative, but after incineration, roughly 25% of the weight of incoming waste remains in the form of residual ash.[21] This ash, which contains high levels of dioxin, mercury, lead, polychlorinated biphenyls ("PCBs"), and polychlorinated naphthalenes ("PCNs"),[22] is disposed of in landfills. Dioxins have been described as the most toxic chemicals known to mankind and are recognized human carcinogens; mercury and lead impair cognitive and behavioral development in children and impact the central nervous system, kidneys, and developing fetuses. When incinerator ash is deposited in landfills, these pollutants eventually leach out and pose an immediate threat to groundwater, drinking water, and surface water bodies.[23] In 2004, Massachusetts' waste incinerators produced approximately 790,000 tons of combustion ash, 700,000 tons of which was deposited in landfills.[24]

3. Incinerators in Massachusetts are disproportionately located in already overburdened Environmental Justice Communities.

The impacts of incinerators' emissions and toxic ash are disproportionately borne by already overburdened environmental justice ("EJ") communities. Most waste incinerators in the U.S. are located in EJ communities,[25] and incinerators in Massachusetts are no exception.

In 2002, Massachusetts established an Environmental Justice Policy ("EJ Policy"), revised most recently in 2017, to help address the disproportionate share of environmental burdens

[19] Vyvyan, *supra* note 17, at 21–22.
[20] Global Alliance for Incinerator Alternatives, Incinerators: Myths vs. Facts 1 (2010), https://www.weal.org/ARCHIVE%20Waste/Incinerator_Myths_vs_Facts.pdf.
[21] U.S. EPA, Municipal Solid Waste in the United States: 2011 Facts and Figures 143–44 (2013), https://archive.epa.gov/epawaste/nonhaz/municipal/web/pdf/mswcharacterization_fnl_060713_2_rpt.pdf.
[22] Global Alliance for Incinerator Alternatives, *supra* note 20, at 1; Jindrich Petrlik and Ralph Anthony Ryder, After Incineration: The Toxic Ash Problem 4–6 (2005), https://ipen.org/sites/default/files/documents/ipen_incineration_ash-en.pdf; Michelle Allsopp, Pat Costner, and Paul Johnston, Incineration and Human Health 11–12 (2001).
[23] Allsopp, *supra* note 22 at 54–56.
[24] Massachusetts DEP, Solid Waste Master Plan: 2006 Revision 43 (2006), https://www.mass.gov/files/documents/2016/08/vo/swmprev.pdf.
[25] The New School, *supra* note 16, at 4 ("58 incinerators, or 79 percent of all MSW incinerators in the U.S. are located in environmental justice communities.").

experienced by lower-income families and communities of color.[26] The EJ Policy is designed to help protect these communities from environmental pollution and promote community involvement in planning and environmental decision-making to maintain and/or enhance the environmental quality of their neighborhoods.[27]

The EJ Policy defines an EJ community as a neighborhood (or "block group") in which either 25 percent of the households have an annual median household income less than or equal to 65 percent of the statewide median, 25 percent of the population is minority, or 25 percent of the population identifies as a household that has English isolation.[28] The following table identifies Massachusetts municipalities in which there are active incinerators,[29] and lists whether the municipality comprises an EJ population, and, if applicable, the specific EJ criteria met and the percentage of the municipality population that meets the EJ criteria.[30] Six of the seven incinerators in Massachusetts are located in EJ communities:

Active Incinerators	**Maximum Permitted Tonnage per Year**	**EJ Populations Present**	**EJ Criteria Met**	**Percent of Population in EJ Block Groups**
Agawam[31]	148,920	Yes	Income	4.3%
Haverhill	602,250	Yes	Minority, Income	35%
Millbury	547,500	Yes	Income	7.2%
North Andover[32]	547,500	Yes	Minority, Income	14.6%
Pittsfield	87,600	Yes	Minority, Income	36.8%
Rochester	1,095,000	No	--	--
Saugus	547,500	Yes	Income	7.0%

[26] Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs 2 (2017), https://www.mass.gov/files/documents/2017/11/29/2017-environmental-justice-policy_0.pdf.
[27] *Id.*
[28] *Id.* at 3.
[29] *See* Municipal Waste Combustors, https://www.mass.gov/guides/municipal-waste-combustors.
[30] Massachusetts DEP, 2010 Environmental Justice Populations, http://www.mass.gov/anf/docs/itd/services/massgis/ej-2010-communitystatistics.pdf.
[31] The Agawam incinerator is located near the border with Springfield, which meets Minority, Income, and English Isolation EJ criteria, and in which 89.6% of the population is in an EJ block group.
[32] The North Andover incinerator is located within one mile of Lawrence, which meets Minority, Income, and English Isolation EJ criteria, and in which 100% of the population is in an EJ block group.

For those forced to live near these facilities, the effects are dire. Throughout the U.S., many of the incinerators with the highest total emissions of lead, mercury, nitrogen oxides, sulfur dioxides, and particulate matter are located in EJ communities.[33] Exposure to these pollutants can cause a wide range of cardiovascular, respiratory, and neurological damage, and can lead to decreased life expectancy.[34] EJ communities face a multitude of social vulnerabilities and are often confronted with many sources of dangerous pollution.[35] Throughout Massachusetts and the U.S., these communities should not be forced to endure the negative impacts of other communities' waste.

4. The RPS should not be adjusted to prop up and extend the life of outdated, aging incinerators.

The proposed changes to the RPS would provide unwarranted life support to the outdated, unsafe, and unreliable incinerator facilities that disproportionately impact the Commonwealth's most vulnerable communities. Each of the incinerators in Massachusetts is at least 30 years old: the oldest, Saugus, began operating in 1975,[36] and the youngest, Haverhill, began operating in 1989.[37]

Incinerators typically have a lifespan of 20–30 years,[38] and require increasing capital investments as they age.[39] Many aging incinerators in the U.S. have been unable to keep up with maintenance requirements and/or emissions limits and have been forced to shut down as a result. For example, a Detroit incinerator, operating since 1986 and increasingly unable to comply with emissions limits,[40] recently announced that it would shut down in the face of a Clean Air Act lawsuit that would have forced the incinerator to spend tens of millions of dollars to upgrade its pollution control equipment.[41] A 33-year-old Wheelabrator incinerator in Baltimore, which has received an estimated $10 million in renewable energy subsidies, emits nitrogen oxides at twice the rate of newer Maryland facilities, and would need to invest millions of dollars to comply with

[33] The New School, *supra* note 16, at 39–41.
[34] *Id.*
[35] *Id.* at 14.
[36] *See* https://www.wtienergy.com/plant-locations/energy-from-waste/wheelabrator-saugus.
[37] *See* https://www.covanta.com/Our-Facilities/Covanta-Haverhill.
[38] The New School, *supra* note 16, at 22; National Research Council, Waste Incineration and Public Health 29–30 (The National Academies Press 2000).
[39] The New School, *supra* note 16, at 22–23.
[40] *See* Rebecca Stoner, Why Communities Across America Are Pushing to Close Waste Incinerators, Pacific Standard, Dec. 12, 2018, https://psmag.com/environment/why-communities-across-america-are-pushing-to-close-waste-incinerators.
[41] *See* The New School, *supra* note 16, at 15.

new, stricter, emissions limits.[42] An aging incinerator in Hartford, Connecticut, has been unable to afford necessary equipment upgrades and shut down for more than two months between November 2018 and January 2019 because of a mechanical failure.[43]

Massachusetts' incinerators are, again, no exception. The Wheelabrator Saugus incinerator, operating since 1975, has suffered from regular shutdowns and outages in recent years.[44] During 2018, according to emissions data reported to DEP by Wheelabrator, either or both of the waste furnaces at the Saugus incinerator were shut down for all or part of 89 separate days.[45] These shutdowns are particularly problematic because the furnaces often emit much higher concentrations of pollutants such as carbon monoxide, sulfur dioxide, and nitrogen oxides during shutdown and startup than during normal operation. For example, during shutdown operations on December 2, 2018, the Saugus incinerator emitted average concentrations of 1,127.4 parts per million ("ppm") of carbon dioxide and 113.5 ppm of sulfur dioxide over two separate one-hour periods.[46] These average emissions significantly exceed the incinerator's Air Quality Operating Permit emissions limits of 100 ppm for carbon dioxide and 29 ppm for sulfur dioxide.[47]

Shutdowns and maintenance can also blanket nearby communities with disruptive and dangerous noise pollution. During a three-week period in June and July, 2019, Wheelabrator Saugus shut down one of its steam turbines to perform necessary maintenance, resulting in loud steam venting that forced neighbors indoors and kept them awake at night.[48]

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[42] *See* Rebecca Stoner, *supra* note 40.
[43] *See* The New School, *supra* note 16, at 24; Cole Rosengren and Rina Li, Connecticut WTE facility partially back online after double turbine failure, Waste Dive (Jan. 31, 2019), https://www.wastedive.com/news/Materials-Innovation-Recycling-Authority-wte-double-turbine-failure/545359/.
[44] *See, e.g.*, Mike Gaffney, Fire Ignites in Wheelabrator Saugus boiler, Wicked Local Saugus (Sept. 30, 2015), https://saugus.wickedlocal.com/article/20150930/news/150939906; Mike Gaffney, Firefighters douse trash fires at Wheelabrator Saugus, Wicked Local Saugus (Aug. 2, 2017), https://saugus.wickedlocal.com/ news/20170802/firefighters-douse-trash-fires-at-wheelabrator-saugus.
[45] Emissions data can be retrieved at http://eeaonline.eea.state.ma.us/DEP/MWC/facilityReport.aspx.
[46] *See id.*
[47] *See* Final Air Quality Operating Permit MBR-95-OPP-011A5 at 5, https://www.mass.gov/files/documents/2019/06/27/op-wheels.pdf.
[48] *See* Kristina Rex, 'No One Sleeps': Revere, Saugus Residents Frustrated By Noise From Waste Plaint, CBS Boston (July 2, 2019), https://boston.cbslocal.com/2019/07/02/revere-saugus-wheelabrator-residents-frustrated-loud-noise-waste-plant/; Mike Gaffney, Wheelabrator Saugus temporarily stops processing waste to address noise complaints, Saugus Wicked Local (June 26,

Moreover, Wheelabrator has stated that its aging Saugus incinerator cannot comply with revised nitrogen oxides emissions limits without major modifications.[49] RPS subsidies, intended to support and spur innovation in renewable energy, should not prop up these aging, polluting incinerators.

5. Incinerators are more expensive and provide fewer jobs than the alternatives.

In part owing to the capital costs of aging facilities, waste incineration is a losing financial proposition for state and local governments. As both a means of energy generation and waste disposal, incineration is more expensive than available alternatives. According to 2010 estimates by the U.S. Energy Information Administration, both capital costs and operations and maintenance costs are higher for MSW incineration than for all other forms of electricity generation, including coal, natural gas, nuclear, biomass, solar, geothermal, and hydroelectric.[50] In light of this imbalance, incineration facilities typically derive a much larger portion of their revenue from tipping fees[51] than from electricity sales.[52]

These tipping fees are significantly more expensive than alternatives such as recycling or composting. Baltimore, for example, pays approximately $18 per ton for recycling, but $50 per ton in incineration tipping fees.[53] Hennepin county, Minnesota, pays more than $80 per ton in incineration tipping fees, but charges only $25 per ton for organics composting.[54] And because incineration facilities rely on tipping fees to stay financially viable, municipalities are often

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2019), https://saugus.wickedlocal.com/news/20190626/wheelabrator-saugus-temporarily-stops-processing-waste-to-address-noise-complaints.

[49] Mike Gaffney, Proposed Wheelabrator Saugus emission control plan modification riles officials, Wicked Local Saugus (Dec. 13, 2018), https://saugus.wickedlocal.com/news/20181212/proposed-wheelabrator-saugus-emission-control-plan-modification-riles-officials.

[50] U.S. Energy Information Administration, Updated Capital Cost Estimates for Electricity Generation Plants 7 (2010), http://large.stanford.edu/courses/2018/ph241/wang-k2/docs/eia-nov10.pdf.

[51] "Tipping fees . . . are charged by a waste disposal site, such as an incinerator or landfill, to a municipality or private waste hauler for each tonnage of waste deposited at the site." The New School, *supra* note 16, at 25.

[52] *Id.* ("Municipal solid waste incinerators rely primarily on tipping fees and secondarily on electricity sales for revenues. As an example, Covanta (which owns 22 facilities and operates 39 facilities in the U.S.), on average, derives its revenues: 71 percent from tipping fees, 18 percent from electricity sales, 5 percent from metal recycling and 6 percent from 'other' (i.e. revenues derived from construction revenues, resale of purchased energy, fees from operating transfer facilities, etc.).").

[53] Donahue, *supra* note 9, at 14.

[54] *Id.*

forced to enter into "put or pay" contracts with incinerators—these clauses require the municipalities to supply a minimum amount of waste or pay a penalty.[55]

And despite the higher costs of incineration, incinerators generate fewer jobs than alternatives such as recycling and compositing facilities. In a 2011 report, Tellus Institute estimated that composting generates five times as many jobs as incineration—and recycling twenty times as many jobs—per ton of waste disposed.[56] The Institute for Local Self Reliance has similarly estimated that composting facilities can create more than three times as many jobs as incinerators per ton of waste.[57] Tellus also estimated in its 2011 report that the implementation of "an aggressive recycling and composting program" resulting in the diversion of 75% of overall MSW by 2030, could result in the creation of 739,000 additional jobs in the U.S. compared to the status quo.[58]

RPS subsidies should not support an expensive system that generates fewer jobs than zero waste alternatives.

6. Any changes to the RPS should be made after the 2020–2030 Solid Waste Master Plan is adopted.

DEP has begun holding Solid Waste Action Committee meetings of stakeholders to develop the new Solid Waste Master Plan. DEP expects to release a draft plan in the fall of 2019, and to publish a final plan by the end of 2020.[59] Goals under consideration include a 33% reduction in waste disposal by 2030 compared to 2017 waste totals.[60] In light of potentially drastic changes to the waste stream in Massachusetts, DOER should not alter RPS subsidies to waste incinerators until after the final 2020–2030 Solid Waste Master Plan is adopted.

Conclusion

Increasing the amount of energy to be purchased from aging, polluting, and expensive incineration facilities or increasing the waste-to-energy Class II rate would only serve to direct more money to existing generators without any benefit to the people of Massachusetts. Indeed, as discussed above, incinerators significantly disadvantage the Commonwealth's people, in particular those that live in EJ communities. The RPS should not be adjusted to prop up and

[55] The New School, *supra* note 16, at 25.
[56] Tellus Institute, More Jobs, Less Pollution: Growing the Recycling Economy in the U.S. 34–35 (2011), https://www.nrdc.org/sites/default/files/glo_11111401a_0.pdf.
[57] Donahue, *supra* note 9, at 15.
[58] Tellus Institute, *supra* note 56, at 36.
[59] John Fischer, MassDEP, MassDEP Updates 5 (2019), https://recyclingworksma.com/wp-content/uploads/2019/05/MassDEP-2019-Spring-WasteWise-Forum.pdf.
[60] John Fischer, MassDEP, 2030 Solid Waste Master Plan Discussion of Goal and Capacity Data 4 (2019), https://www.mass.gov/files/documents/2019/06/19/swmp519.pdf.

conservation law foundation

extend the operation of aging incineration facilities, nor should it be used to facilitate the development of new trash-burning plants, at the expense of the health and lives of residents of the Commonwealth.

Thank you again for the opportunity to comment on the proposed changes to Massachusetts' Renewable Portfolio Standard ("RPS") Class I and RPS Class II Regulations.

Very truly yours,

Kirstie L. Pecci
Director Zero Waste Project
Conservation Law Foundation

Global Alliance for Incinerator Alternatives

Acadia Center

Alliance for Health and Environment

Berkshire Environmental Action Team

Clean Water Action

Climate Action Now Western Massachusetts

Cooperative Energy, Recycling, and Organics

Environmental League of Massachusetts

Institute for Local Self Reliance

Massachusetts Sierra Club

MASSPIRG

No Fracked Gas in Mass

Partnership for Policy Integrity

Sustainable Wellesley

Toxics Action Center

Judith Enck
Founder, Beyond Plastics
Former EPA Regional Administrator

Mike Ewall, Esq.
Executive Director, Energy Justice Network

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

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

December 23, 2020

Kathleen A. Theoharides
Secretary of Energy and Environment
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
ATTN: MEPA Office
Boston, MA 02114

RE: SEIR Review. EOEEA 11333
BOURNE. Integrated SWM Facility at 201 MacArthur Boulevard

Dear Secretary Theoharides,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Single Environmental Impact Report (SEIR) for BOURNE. Integrated SWM Facility, Barnstable, Massachusetts (EOEEA #16148). The Project Proponent provides the following information for the Project:

The following Project Description is consistent with the description included in the ENPC, with minimal changes that respond to the comments that were received on it. In 2016, the Town acquired approximately twelve acres of undeveloped land, abutting the residential recycling center at the extreme southern boundary of the site. This acquisition has enabled the Town to contemplate a site development plan whereby offices, maintenance and handling facilities would be relocated to that new parcel. By doing this, Phase 7 and Phase 8 could be developed on the 25-acre parcel thereby extending the life of the landfill operations. Currently the 25-parcel is site-assigned only for solid waste handling and is the location of the C&D transfer station, single stream recyclables transfer station, the residential recycling center, and other facilities. In order to expand the Landfill into this area, the site assignment will need a major modification from the Bourne Board of Health. In addition, MA DEP commented in the ENPC that the Phase 9 vertical expansion requires a major modification to the Site Assignment. The site assignment process is contemplated to be undertaken in late 2020 after the MEPA process has been completed. Attachment 3 contains plans for the site master plan that show the phasing options for the landfill and a conceptual layout of relocated infrastructure on the 12-acre parcel.

Bureau of Water Resources Comments

Wetlands. SEIR addresses the Wetlands and Waterways Program's comments.

Wastewater/(Leachate). The Proponent has met with representatives of MassDEP to discuss the option of treating leachate onsite and disposing the treated wastewater at the Joint Base Cape Cod infiltration basin. The Proponent is aware of the permitting requirements.

Bureau of Waste Site Cleanup Comments

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed Project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

There are several listed MCP sites located within 1000-feet of the proposed Project area. The disposal sites have all been closed under the MCP, and no further response actions or reporting are required. Note that one of the closed disposal sites is located at the Bourne ISWM facility (Release Tracking Number 4-14181). It is unlikely that any of these closed sites will impact the proposed MEPA Project area.

There are no other listed MCP disposal sites located at or in the vicinity of the site that would appear to impact the proposed Project area. Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer (Oliver) at: http://maps.massgis.state.ma.us/map_ol/oliver.php Under "Available Data Layers" select "Regulated Areas", and then "DEP Tier Classified 21E Sites". The compliance status and report submittals for specific MCP disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: https://eeaonline.eea.state.ma.us/portal#!/search/wastesite

The Project Proponent is advised that if oil and/or hazardous material are identified during the implementation of this project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP, if necessary. A Licensed Site Professional (LSP) should be retained to determine if notification is required and, if need be, to render appropriate opinions. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. The BWSC may be contacted for guidance if questions arise regarding cleanup.

Bureau of Air and Waste (BAW) Comments

Solid Waste Management. Based on its review of the Single Environmental Impact Report for the Town of Bourne Integrated Solid Waste Management Facility in Bourne, EEA No. 11333, the Massachusetts Department of Environmental Protection (MassDEP) Solid Waste Management Section has determined that the Proponent has adequately addressed its comments previously provided in the Expanded Notice of Project Change documents. MassDEP has verified that the Draft Section 61 Findings are in general compliance with solid waste compliance requirements.

1. Solid Waste Permitting: The proposed expansion will require the following solid waste permits:
    a. For the proposed landfill expansion:
        - Site Suitability Report for a Major Modification of an Existing Site Assignment (BWP SW 38).
        - Authorization to Construct a Large Landfill Expansion (BMP SW 26), and
        - Authorization to Operate (BWP SW 10).
    b. For the proposed solid waste transfer station:
        - Site Suitability Report for a New Site Assignment (BWP SW 01).
        - Authorization to Construct a Large Handling Facility (BWP SW 05); and
        - Authorization to Operate a Large Handling Facility (BWP SW 06).

    Prior the submission of a BWP SW 38 or BWP SW 01 application, MassDEP requires a preapplication meeting to discuss comments received from the public on the SEIR and to ensure

the facility design and operational measures will comply with solid waste regulations and applicable policies with an emphasis on odor, noise, and traffic mitigation.

2. Additional Public Participation: The following permit applications have public comment periods:
   a. BWP SW 01 applications: There is a 21-day public comment period.
   b. BWP SW 38 applications: There is a 21-day public comment period.
   c. Board of Health Site Assignment Decisions: The Board of Health must hold a public hearing in accordance with 310 CMR 16.20.
   d. BWP SW 05 applications: There is a minimum 30-day public comment period.
   e. BWP SW 26 applications: There is a minimum 30-day public comment period.
   f. BWP SW 06 or BWP SW 10 applications: Public comments are not required prior to issuing a decision, but MassDEP may issue provisional approval with a deferred effective date to allow for 21-day public notice/comment period.

   All solid waste applications may be reviewed online at: https://eeaonline.eea.state.ma.us/EEA/PublicApp/.

3. Waste Types: Regarding the type of waste accepted for disposal at the Landfill, the SEIR discusses a "preferred alternative" in which the Town continues landfilling ash at approximately 80% and MSW at approximately 20% and a "MSW alternative" in which the Town landfills only MSW. During MassDEP solid waste permitting, the Town will be required to evaluate both scenarios. However, regardless of waste type, MassDEP solid waste regulations require the Proponent to ensure that landfill operations do not create nuisance problems with vectors, odors, dust, noise, litter, or other nuisance conditions.

4. The SEIR provided additional details regarding the Proponent's plan to install a long-term intermediate cover system prior to the installing the final cover system. MassDEP will further evaluate this plan including the proposed schedule for capping the landfill during solid waste permitting. MassDEP may require the Proponent to revise the proposed schedule for capping if there are issues with leachate management, nuisance conditions, or as necessary to ensure compliance with 310 CMR 19.000.

5. If you should have any further questions please contact Mark Dakers, Solid Waste Section chief at (508) 946-2847.

Air Quality. The Proponent is aware that Air Quality Permitting is likely required for any of the landfill gas use options that are described in the SEIR and advised to contact the Air Quality Permitting Section early in any planning stages.

Stormwater Management EPA Permitting. The Proponent states that the Project needs neither a NPDES Construction General Permit nor a NPDES Multi Sector General Permit and has consulted a MassDEP representative regarding the need for these permits. Although is it likely that these permits are not needed. The Proponent is advised to directly contact the EPA for a final determination since these permits are under the sole jurisdiction of the EPA. The New England NPDES contact is Dave Gray (gray.davidj@epa.gov), 617-918-1577.

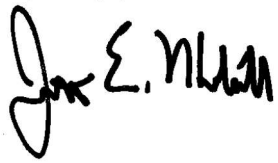
Climate Change / GHG

The Proponent has extensively analyzed the potential for using landfill gas as an energy source. The Department is supportive for its reuse and encourages the Proponent to advance any feasible options while also reducing its operational emissions of methane.

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this SEIR. If you have any questions regarding these comments, please contact George Zoto at (508) 946-2820.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
David Johnston, Deputy Regional Director, BWR
Gerard Martin, Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Dan Gilmore, Wetlands and Waterways, BWR
Carlos Fragata, Wetlands and Waterways, BWR
Mark Dakers, Solid Waste, BAW
Alison Cochrane, Solid Waste, BAW
Elza Bystrom, Solid Waste, BAW
Allen Hemberger, Site Management, BWSC

MASSWILDLIFE

DIVISION OF
FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

December 17, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Anne Canaday, EEA No. 11333
100 Cambridge Street
Boston, Massachusetts 02114

Project Name:	*Bourne Integrated Solid Waste Management Facility*
Proponent:	*Town of Bourne, Dept. of Integrated Solid Waste Management (ISWM)*
Location:	*201 MacArthur Boulevard, Bourne, MA*
Project Description:	*Landfill Expansion*
Document Reviewed:	*Single Supplemental Environmental Impact Report*
EEA File Number:	*11333*
NHESP Tracking No.:	*17-36534*

Dear Secretary Theoharides:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the *Single Supplemental Environmental Impact Report* (SSEIR; dated November 13, 2020) for the Town of Bourne ISWM's Landfill Expansion Project (the Project) and would like to offer the following comments regarding state-listed species and their habitats.

According to the information provided in the SSEIR, portions of the Project site are mapped as Priority Habitat for the Eastern Box Turtle (*Terrapene carolina*), a species state-listed as Special Concern according to the *Massachusetts Natural Heritage Atlas* (14th Edition). This species and its habitats are protected pursuant to the Massachusetts Endangered Species Act (MGL c.131A) and its implementing regulations (MESA; 321 CMR 10.00). A Fact Sheet for this species can be found on our website, www.mass.gov/nhesp.

All projects or activities proposed within Priority Habitat, which are not otherwise exempt pursuant to 321 CMR 10.14, require review through a direct filing with the Division for compliance with the MESA (321 CMR 10.18). The Division determined (letter dated February 5, 2020) that Phases 7, 8 and 9 of the Project, as currently proposed, appear to be exempt from MESA review pursuant to 321 CMR 10.14. However, as noted in the Division's previous comments to MEPA on the Project (dated June 19, 2018), development of the proposed Future Handling Area – and specifically, any work within the "Limit of Box Turtle Habitat" shown on the site plans (SSEIR, Attachment 3, Figures 2, 3 and 6) – will require a direct filing with the Division for compliance with MESA.

The Proponent has been working with the Division on a pre-filing basis to evaluate impacts associated with development of the Future Handling Area. In advance of a formal MESA filing, the Division anticipates – based on ongoing consultations with the Proponent and information submitted to date – that development of the Future Handling Area, as proposed, will likely result in a Take (321 CMR 10.18 (2)(b)) of Eastern Box Turtle.

Projects resulting in a Take of state-listed species may only be permitted if they meet the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23). In order for a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species; (b) demonstrate that an insignificant portion of the local population will be impacted; and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species.

The Proponent has also proactively consulted with the Division on a pre-filing basis to avoid, minimize and mitigate impacts to state-listed species and their habitats associated with development of the Future Handling Area. Based on ongoing consultations and information submitted to date, we understand that the Proponent intends to meet the performance standards of a CMP by permanently protecting off-site land as open space and state-listed species habitat through fee conveyance to the Town of Bourne Conservation Commission. The Proponent has identified a candidate parcel in the vicinity of the property which should provide an acceptable option to address the required long-term net benefit for Eastern Box Turtle associated with the Project. The Division understands that the Proponent may also propose to permanently protect portions of the property, as shown on the "Conceptual Site Buildout Plan (SSEIR, Attachment 3, Figure 6). Although the exact details of the long-term net benefit required under a CMP have not yet been finalized, the Division anticipates that a suitable long-term net benefit can be achieved through the protection of suitable, high quality off- and on-site habitat and that the Project should be able to meet the performance standards of a CMP.

The Division will not render a final decision regarding the Future Handling Area until the MEPA review process and its associated comment period is complete, and until all required MESA filing materials are submitted to the Division. No work associated with the Future Handling Area shall occur on the property until the MESA review process is complete.

If you have any questions about this letter, please contact Jesse Leddick, Chief of Regulatory Review, at (508) 389-6386 or jesse.leddick@mass.gov. We appreciate the opportunity to comment on the Project.

Sincerely,

Everose Schlüter, Ph.D.
Assistant Director

cc: Phil Goddard, Town of Bourne ISWM Department
Daniel T. Barrett, Town of Bourne ISWM Department
Town of Bourne Board of Selectmen
Town of Bourne Conservation Commission
Town of Bourne Planning Department
DEP Southeast Regional Office
Amy Ball, Horsley Witten Group, Inc.