

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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May 25, 2016

Casella Waste Systems, Inc.
25 Greens Hill Lane
Rutland, VT 05701

Attention: John Casella,
President

Re: Southbridge Landfill
165 Barefoot Road
Southbridge, MA
RTN 2-0019678

Interim Deadline
Immediate Response Action
310 CMR 40.0000
M.G.L. c. 21E

Dear Mr. Casella:

On October 23, 2015, Casella Waste Systems, Inc., on behalf of Southbridge Recycling & Disposal Park, Inc. (collectively, "SRDP" or "you") notified MassDEP of a two-hour reporting condition for detections of chlorinated volatile organic compounds (CVOCs) and 1,4-dioxane exceeding the applicable Reportable Concentrations (RCGW-1) in three private drinking water wells on H. Foote Road in Charlton, Massachusetts, near the Southbridge Landfill, as required by 310 CMR 40.0311(6). On October 23, 2015, MassDEP verbally approved you to conduct an Immediate Response Action (IRA) deemed necessary to address the notification conditions detailed above, in accordance with 310 CMR 40.0420.

Immediate Response Actions have been performed under the verbal IRA approval and pursuant to follow-up communications between MassDEP, Casella Waste Systems, Inc., and Mr. Jeffrey Arps as the Licensed Site Professional (LSP) of Record. These actions are described in the IRA Plan submitted on December 22, 2015. MassDEP conditionally approved your IRA Plan in correspondence issued to you on January 12, 2016. Your IRA Plan included:

- Quarterly sampling of the potable wells that were previously sampled and with the potential for additional wells based on pending results of current sampling efforts. Samples will be submitted to an analytical laboratory for VOC analysis using US

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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Interim Deadline

Casella Waste Systems, Inc.; 165 Barefoot Rd., Southbridge; RTN: 2-0019678

EPA Method 522, using MassDEP Compendium of Analytical Methods (CAM) protocols. Potable wells where laboratory analysis results in J-qualified data will be resampled and the usability of the data verified by third-party data validation. Further, the IRA Plan states that following two consecutive rounds of non-detect results at the reporting limit, SRDP will remove those locations from the ongoing quarterly potable well sampling program;

- Continue regular monitoring and maintenance of the point of entry treatment (POET) system installed at 65 H. Foote Rd., including replacement of a respective granulated activated carbon unit (GAC) in the event that mid-point or effluent sampling indicates breakthrough is occurring; and
- Additional groundwater investigation and assessment through installation of a monitoring well couplet to be located southwest of the Landfill, adjacent to Barefoot Rd., and two shallow bedrock wells to be installed west of the existing Landfill as shown in the IRA Plan. Following installation of the monitoring wells, groundwater samples will be submitted to an analytical laboratory for VOC analysis by EPA Method 8260C (using 8260 SIM for 1,4-dioxane). Subsequently, sampling of these monitoring wells will be conducted in conjunction with the current quarterly landfill monitoring program.

On February 22, 2016, you submitted the first IRA Status Report to MassDEP and submitted a subsequent IRA Status Report on May 24, 2016. Pursuant to the Massachusetts Contingency Plan (MCP), following the first IRA Status Report, subsequent IRA Status Reports must be submitted every six (6) months until such time that an IRA Completion Statement is submitted to MassDEP. However, as discussed with Samuel Nicolai, Director of Engineering of Casella Waste Systems, Inc., MassDEP is requiring IRA Status Reports on a more frequent basis due to the complexity of Site conditions, and the amount and timing of available data and laboratory results. MassDEP is requiring the submittal of your next IRA Status Report by **July 23, 2016**, and subsequent IRA Status Reports within sixty (60) days from either the date of the previously submitted IRA Status Report, or within 30 days of your receipt of the quarterly private well sampling results, whichever date is earlier. Also, MassDEP shall be verbally notified seven (7) days prior to the commencement of assessment, investigatory, or remedial field activities at the Site. Such deadlines are established as Interim Deadlines, pursuant to 310 CMR 40.0165 and 40.0420(10)(b), until the IRA is considered complete by MassDEP or otherwise agreed to by MassDEP in writing.

In addition to the information required to be submitted in according to 310 CMR 40.0425(3), MassDEP requests that each submitted IRA Status Reports contain the following:

- A detailed scope and schedule of further groundwater assessment and sampling (including groundwater sampling results for landfill monitoring performed for MassDEP's Bureau of Air & Waste), bedrock investigation, pump tests, and geophysical investigation to be conducted for each upcoming reporting period to determine the extent of contamination in the overburden and bedrock aquifers, and to continually assess and evaluate for IRA conditions, including potential

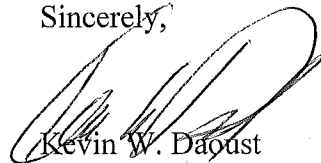
impacts to public and private water supply wells, as per 310 CMR 40.0407(11). The scope shall include the number, approximate location, and installation with well screen depth of monitoring wells to determine the horizontal and vertical extent of contamination. MassDEP may require that some monitoring wells shall be installed as potential recovery wells in an effort to support the potential for future remedial actions, if later deemed feasible.

Results of any and all such assessment and sampling conducted in the prior reporting period shall also be included in each IRA Status Report submitted. Results of assessment conducted to date shall be included in the IRA Status Report to be submitted by July 23, 2016;

- Further detailed design and schedule of the installation of the interceptor trench as referenced in the Supplemental Final Environmental Impact Report (SFEIR). Specifically, the location of collection sampling ports from within the interceptor trench and the design in relation to the overlying mechanically enhanced berm proposed to be installed at the Landfill;
- Two figures depicting regional cross sectional view across the Site from north to south and east to west, including, but not limited to the depth of all sampled private wells, all monitoring wells including the irrigation well, surface water features, the interceptor trench as stated in the Supplemental Final Environmental Impact Report (SFEIR) and associated addendums, the vertical and horizontal extent of waste, the bedrock surface, and measured and estimated groundwater table;
- A status of efforts toward the extension of the public water supply distribution line to eliminate known and potential Critical Exposure Pathways (CEPs), as required by 310 CMR 40.0413(3) and (4) to evaluate the feasibility of providing public water;
- The status of temporary water supplies Casella has previously voluntarily agreed to provide to residents with private wells; and
- On a biannual basis until the IRA is considered complete by MassDEP, the status of an ongoing feasibility evaluation of remedial alternatives to address source control and migration of groundwater contamination from the Landfill as they relate to CEPs.

Additional response actions and assessment may be required by MassDEP under the IRA based upon site specific conditions and information as it becomes available, pursuant to 310 CMR 40.0420(2). MassDEP appreciates your continued cooperation in this matter. If you have any questions, please do not hesitate to contact me at the letterhead address or by telephone at (508) 767-2805.

Sincerely,



Kevin W. Daoust
Section Chief
Emergency Response
Bureau of Waste Site Cleanup

MEB/KWD
[C&E/INTLET]

ecc: Mary Jude Pigsely, Regional Director, MassDEP-CERO
Mark Baldi, Acting Deputy Regional Director, BWSC, MassDEP-CERO
John Kronopolous, Deputy Regional Director, BAW, MassDEP-CERO
James McQuade, Section Chief, Solid Waste, BAW, MassDEP-CERO
Southbridge Board of Health
Southbridge Town Manager
Charlton Board of Health
Charlton Board of Selectmen
Sturbridge Board of Health
Sturbridge Board of Selectmen
Tracy Markham; SRDP, Inc.
Samuel Nicolai; Casella Waste Systems, Inc.
Gary Magnuson, LSP
Jeffrey Arps, LSP
Nicole Roy; Sanborn, Head & Associates, Inc.

cc: Database Entry

2-0019678 – Marlborough– Interim Deadline