

**COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In re Massachusetts Natural Fertilizer Company, Inc. and Otter Farm Inc.) Unilateral Administrative Order) And Permit Suspension) Enf. No. 00013644))
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NOTICE OF CLAIM FOR ADJUDICATORY HEARING

Pursuant to G.L. c. 30A, § 10, G.L. c. 21A, Sec. 16, and 310 CMR 1.01 *et seq.*, 310 CMR 5.00 *et seq.*, and 310 CMR 40.0000 *et seq.*, Massachusetts Natural Fertilizer Company, Inc. (“MNF”) and Otter Farm Inc. (“Otter Farm”) (collectively, the “Petitioners”) submit this Notice of Claim for Adjudicatory Hearing (“Appeal”) requesting that the Department of Environmental Protection (“Department”) vacate or rescind the Unilateral Administrative Order and Permit Suspension (“UAO”) issued to Petitioners on July 20, 2022 (attached hereto as Exhibit A) on the grounds that the UAO was issued without basis in fact and/or law, and in excess of the Department’s authority under applicable laws and regulations.

This appeal is timely filed within twenty-one days of the issuance of the UAO.

Pursuant to 310 CMR 1.01(6), the Petitioners state as follows:

Factual Background

MNF operates a fully-permitted composting business at 65 Bean Porridge Hill Road in Westminister (the “Property”); MNF leases the Property from Otter Farm. MNF operates its composting facility pursuant to a “Final Approval Recycling, Composting or Conversion (“RCC”) Operation BWP SW46,” Authorization Number SW46B/47B-0000053 (“RCC Permit”), most recently issued by the Department on October 6, 2020. MNF has operated the business for over thirty years. MNF was initially permitted by the Massachusetts Department of

Agricultural Resources; in 2016 permitting responsibility was transferred to the Department due to regulatory change. Since that time, all appropriate recycling permits have been issued by the Department to MNF.

The Property is the site of a former egg farm, and MNF utilizes approximately thirty acres of the Property. MNF accepts and utilizes source separated organics (“SSO”) from various sources and suppliers to compost into marketable compost materials. The facility is permitted to perform a needed function of reducing waste materials that would otherwise be destined for landfills.

In February 2022, private drinking water wells along Bean Porridge Hill Road in Westminster were found to contain certain per- and poly-fluoroalkyl substances (“PFAS”) regulated by the Department under M.G.L. c. 21E and 310 CMR 40.0000, the Massachusetts Contingency Plan (“MCP”), as described more specifically below. PFAS concentrations detected in the private wells exceeded Imminent Hazard Levels, as established by the MCP.

On March 31, 2022, the Department issued a Notice of Responsibility (“NOR”) to MNF and Otter Farm. According to the NOR, laboratory analysis of a sample collected by a nearby homeowner on 67 Bean Porridge Hill Road on January 31, 2022, indicated the sum of six regulated PFAS compounds (PFAS6): perfluorooctanesulfonic acid (PFOS), perfluorooctanoic acid (PFOA), perfluoroheptanoic acid (PFHpA), perfluorodecanoic acid (PFDA), perfluorohexanesulfonic acid (PFHxS), and perfluorononanoic acid (PFNA) at a concentration of 1,335 ng/L in the drinking water from the supply well at the residence.

The Department performed a second round of sampling at the private drinking water well at 67 Bean Porridge Hill Road, on February 24, 2022. The laboratory results were received on March 15, 2022, confirming elevated concentrations of PFAS6 at 1,021 ng/L in the private

drinking water well. On February 24, 2022, the Department contracted Environmental Strategies & Management (ESM), Inc. to sample five residential private wells within 500 feet of 67 Bean Porridge Hill Road. The Department received the results of the additional private drinking water well sampling efforts between March 11, 2022, and March 14, 2022. The results indicate PFAS6 in drinking water in each of the private drinking water wells at concentrations between 333 and 1,815 ng/L.

On May 17, 2022, the Department issued a Unilateral Administrative Order (the “May UAO”) requiring MNF to, inter alia, (1) cease and desist from *distributing* any materials containing PFAS at levels that would exceed Reportable Concentrations for PFAS if used in an area designated as Groundwater Category GW-1,¹ and (2) submit a sampling plan for materials at the Property; the Department approved the proposed plan and samples were subsequently taken. The May UAO allowed MNF to continue operations, which was the desired outcome by both MNF and the Department.

On June 30, 2022, MNF provided thirty sampling results that were taken between May 25 and June 2, 2022 to the Department. These results showed that the samples contained exceedances of one or more PFAS; specifically, RCS-1 reporting thresholds were exceeded. Further, in compliance with the May UAO, MNF collected 189 samples between July 7 and July 13, 2022.

The Department has now determined that continued operations of MNF pose a threat to human health, safety, or the environment due to the presence of PFAS in materials and groundwater at the Property, as well as in private drinking water wells off-site. Based on

¹ In June 2022, the United States Environmental Protection Agency established new guidance for PFAS in drinking water, including an interim Health Advisory Level of 0.004 parts per trillion (ppt) for PFOA (i.e., 4 parts per quadrillion). This standard is the equivalent of four drops in *one thousand Olympic-size swimming pools*. The Department is currently evaluating this new guidance.

exceedances of PFAS concentrations in incoming, intermediary, and finished materials at the Property, as well as PFAS in water giving rise to an Imminent Hazard as defined by the MCP, the UAO issued by the Department directs MNF to cease all composting operations, and to remove all material “exceeding PFAS standards”. UAO, para. 17. Further, the Department has suspended MNF’s RCC Permit.

The Petitioners now bring this Notice of Claim for Adjudicatory Hearing.

The UAO Does Not Comply With Applicable Law and Regulations

The UAO is not consistent with applicable laws and regulations. Overall, the UAO does not apply the proper standards and metrics for assessing acceptable levels of PFAS in the materials at issue, ignores proper testing protocol in the MCP, and fails to identify crucial background levels for PFAS. Accordingly, the Petitioners request that the UAO be vacated or rescinded in its entirety.

As set forth above, the UAO states that because sampling results exceeded the RCS-1 reporting thresholds established by the MCP, the operations of MNF poses a threat to human health, safety, or the environment. Critically, however, the UAO ignores the constituents and contents of the material that has been tested for PFAS. The UAO identifies various materials tested at the Property: landfill cover, golf course material, fiber biopellets, potting soil, compost, windrow, loam, paper, lettuce waste, tea leaves waste, and cannabis roots. UAO, para. 10. The UAO assesses PFAS contained in these materials against the RCS-1 values under the MCP.

The RCS-1 reporting threshold, of course, applies to “soil” as thoroughly defined in the MCP:

Soil means any unconsolidated mineral and organic matter overlying bedrock that has been subjected to and influenced by geologic and other environmental factors, excluding sediment.

310 CMR 40.0006, Definitions.

There are two MCP soil reporting thresholds, RCS-1 and RCS-2, that apply to soil samples depending on where the samples are obtained. Both criteria apply only to “soil”, however:

(a) Reporting Category RCS-1. Reporting category RCS-1 shall be applied to all soil samples obtained:

1. at or within 500 feet of a residential dwelling, a residentially-zoned property, school, playground, recreational area or park; or
2. within the geographic boundaries of a groundwater resource area categorized as RCGW-1 in 310 CMR 40.0362(1)(a).

(b) Reporting Category RCS-2. Reporting category RCS-2 shall be applied to all soil samples that are not obtained from category RCS-1 areas.

310 CMR 40.0361. That is, all RCS values apply to concentrations *in soil*, only.

Against this backdrop, there is no basis to apply *any* Reportable Concentrations to material tested at the Property, in either its incoming, intermediary, or finished state. There is no dispute that the MNF materials that were sampled are *not soil* for the purposes of the MCP. That is, none of the tested material constitutes “unconsolidated mineral and organic matter overlying bedrock that has been subjected to and influenced by geologic and other environmental factors”.

310 CMR 40.0006. The materials tested at the Property include landfill cover, golf course material, fiber biopellets, potting soil, compost, paper, windrow, loam, lettuce waste, tea leaves waste, and cannabis roots. Even the “potting soil” cannot be deemed to be “unconsolidated mineral and organic matter”, in that the “soil” has been consolidated through the commercial compost process operated by MNF. As such, the RCS-1 thresholds are meaningless when applied to this material, and the UAO cannot be based on this criteria.

Even if soil reporting criteria are to be applied to this material, however, it is unclear that there are “exceedances”. Pursuant to the MCP, averaging data is permitted when determining

concentrations. That is, arithmetic averaging of concentration data is permitted in order to determine Exposure Point Concentrations. See, e.g., 310 CMR 40.0926. Here, the samples have not been averaged to determine concentrations. Therefore, “exceedances” may not exist, even if soil thresholds were properly applied to the sampling results.

Furthermore, the UAO itself acknowledges in Paragraph 10 that the data for four materials – Seaman paper, lettuce waste, tea leaves waste, and cannabis roots – is inconclusive as to whether the materials contain PFAS at concentrations exceeding RCS-1 reporting thresholds. Accordingly, it is arbitrary, capricious and an abuse of discretion for the UAO to require MNF to cease accepting and processing these materials.

Finally, the Department has not identified background conditions for PFAS. “Background” is defined as “those levels of oil and hazardous material that would exist in the absence of the disposal site of concern”. 310 CMR 40.0006. Without knowing background for PFAS at the site in question, the levels of PFAS detected in groundwater is meaningless with respect to determining a source.

Accordingly, because the UAO is arbitrary, capricious and not otherwise in compliance with applicable regulations, it should be rescinded. There is no identified basis to require MNF to cease all operations, or for its RCC Permit to be suspended. Further, as set forth above, the “PFAS standards” alleged to have been exceeded are simply inapplicable here, and cannot form the basis for removing material from the Property, or for shutting down the entire facility.

Conclusion and Request for Relief

For the reasons set forth above, as well as those which the Petitioners reserve the right to raise, as these proceedings unfold, the Petitioners request that the Administrative Magistrate vacate or rescind the UAO. The Petitioners request that the Department grant them an

adjudicatory hearing in this matter. The Petitioners have submitted the required filing fee in the amount of \$100 (copy of fee transmittal form attached hereto as Exhibit B). A copy of this Request has been sent to the Department's identified contact person via certified mail.

Respectfully submitted,

Massachusetts Natural Fertilizer Company,
Inc.

By its attorney,

George F. Hailer
George F. Hailer
Lawson & Weitzen, LLP
88 Black Falcon Avenue
Boston, Massachusetts 02210

617-439-4990

Otter Farm Inc.

By its attorney,

Joseph R. Brendel
Joseph R. Brendel
Clark Hill PLC
One Oxford Centre, 14th Floor
301 Grant Street
Pittsburgh, Pennsylvania 15219

412-394-2373

Dated: August 9, 2022

Exhibit A



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Bethany A. Card
Secretary

Martin Suuberg
Commissioner

**THE ATTACHED DOCUMENT IS IMPORTANT. FAILURE TO TAKE ADEQUATE
ACTION IN RESPONSE TO IT COULD RESULT IN SERIOUS LEGAL
CONSEQUENCES.**

BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED
AND BY EMAIL

William Page, Jr.
Massachusetts Natural Fertilizer Company, Inc.
65 Bean Porridge Hill Road
Westminster, MA 01473
email: mnatural49@yahoo.com

Re: BAW – Westminster
Violations of M.G.L. c. 111, §§150A &
150A1/2 and 310 CMR 16.00
FMF #137739
Enforcement Document Number 00013644

UNILATERAL ADMINISTRATIVE ORDER

Dear Mr. Page:

Attached is a UNILATERAL ADMINISTRATIVE ORDER the Massachusetts Department of Environmental Protection (“MassDEP”) is now issuing to you.

The ORDER contains a written description of (1) activities observed by MassDEP; (2) the statutory and regulatory requirements violated; (3) the actions MassDEP now wants you to take to correct the violations; and (4) the deadline for taking such actions.

Please note that an appeal of Administrative Order Enforcement Document # 00013644 must be sent by United States mail or hand delivered to MassDEP within twenty-one (21) days after issuance of the Order. Complete instructions relative to the appeal of this Order may be found in Section IV of this document.

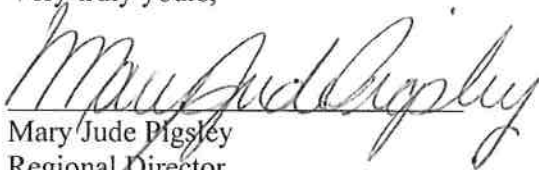
If you fail to take any action MassDEP now wants you to take by the prescribed deadline, or if you otherwise fail to comply in the future with the requirements applicable to you, you could be subject to legal action. Such action could include criminal prosecution, court-imposed

civil penalties, or civil administrative penalty, which may be assessed for every day from now on that you are in noncompliance with the requirements referred to above.

If you have any questions, please contact Douglas Fine, Deputy Regional Director at 508-767-2757, or you may have your attorney contact Anne Berlin Blackman, Chief Regional Counsel at (508) 767-2766.

7/20/22
Date

Very truly yours,


Mary Jude Pigsley
Regional Director

Enc.: Unilateral Administrative Order

cc: William Page, Jr., Massachusetts Natural Fertilizer Company, Inc., P.O. Box 363,
Westminster, MA 01473
George Jones, Otter Farm, Inc., 35 Wilkins Road, Gardner, MA 01440-2833,
(george.jones@seamanpaper.com)
Westminster Board of Health, Town of Westminster, Town Hall, 11 South Street,
Westminster, MA 01473, (aconlin@westminster-ma.gov)

**COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

_____)
In the Matter of:)
)
Massachusetts Natural)
Fertilizer Company, Inc. and)
Otter Farm Inc.)

**UNILATERAL
ADMINISTRATIVE
ORDER AND PERMIT SUSPENSION**

Enforcement Document # 00013644

I. THE PARTIES

1. The Massachusetts Department of Environmental Protection (“MassDEP”) is a duly constituted agency of the Commonwealth of Massachusetts established pursuant to M.G.L. c. 21A, § 7. MassDEP maintains its principal office at One Winter Street, Boston, Massachusetts 02108, and its Central Regional Office at 8 New Bond Street, Worcester, Massachusetts 01606.
2. Massachusetts Natural Fertilizer Company, Inc. (“Mass Natural”) is a Massachusetts corporation with its principal office at 65 Bean Porridge Hill Road, Westminister, Massachusetts. For the purposes of this Order, Mass Natural’s mailing address is 65 Bean Porridge Hill Road, Westminister, MA 01473.
3. Otter Farm, Inc. (“Otter Farm”) is a Massachusetts corporation with its principal office at 35 Wilkins Road in Gardner, Massachusetts. Pursuant to a deed recorded in the Worcester North District Registry of Deeds in book 4146 at page 234, Otter Farm owns three contiguous parcels of land off Bean Porridge Hill Road in Westminister, Massachusetts identified by the Westminister Assessor’s Office as Parcel ID 44//18, Parcel ID 44//19, and Parcel ID 44//20. For purposes of this Order, Otter Farm’s mailing address is 35 Wilkins Road, Gardner, MA 01440.

II. STATEMENT OF FACTS AND LAW

4. MassDEP is responsible for the implementation and enforcement of M.G.L. c. 111, § 150A and M.G.L. c. 111, § 150A1/2 and the Site Assignment Regulations for Solid Waste Facilities at 310 CMR 16.00. MassDEP has authority under M.G.L. c. 111, § 2C to issue Orders to any person in violation of any law or regulation MassDEP is authorized to enforce. The Site Assignment Regulations at 310 CMR 16.01(6) provide that the owner and operator shall be jointly and severally liable such that MassDEP may take action for any violation against the owner, the operator, or both.
5. On October 6, 2020, MassDEP issued a “Final Approval Recycling, Composting or Conversion (RCC) Operation BWP SW46,” Authorization Number SW46B/47B-0000053 (the “RCC Permit”), to Mass Natural for its operations at 65 Bean Porridge Hill Road in

Westminster, Massachusetts (the "Site"). The RCC Permit became effective on October 27, 2020 and expires on October 27, 2025.

6. The RCC Permit authorizes Mass Natural to accept and utilize source-separated organics and other compostable materials to produce marketable compost materials at the Site.

7. Paragraph VI.B.4. of the RCC Permit requires Mass Natural to "ensure that the Operation, at all times, does not accumulate or store or handle materials of a nature or in quantities so as to cause or pose a threat to the public health, safety, welfare or the environment."

8. The private drinking water well at the Site and more than 100 private drinking water wells near the Site are contaminated with high levels of certain per- and poly-fluoroalkyl substances (collectively, "PFAS") regulated by MassDEP under M.G.L. c. 21E and 310 CMR 40.0000 (the "MCP"). PFAS levels in most of those private wells (83) exceed Imminent Hazard Levels as described in 310 CMR 40.0321(2)(a). MassDEP has identified Mass Natural and Otter Farm as Potentially Responsible Parties ("PRPs") for the private well contamination under the MCP. The PRPs are providing bottled water and/or water treatment systems to private well owners with contaminated wells and they continue to investigate the full extent of private well contamination from the Site as part of an Immediate Response Action Plan under 310 CMR 40.0414.

9. On May 17, 2022, MassDEP issued a Unilateral Administrative Order, Enforcement Document No. 00013278 (the "UAO"), directing Mass Natural to cease and desist from distributing any materials containing PFAS at levels that would exceed applicable standards for PFAS in groundwater that is or could be used as drinking water, including private wells. The UAO was based on information Mass Natural voluntarily submitted to MassDEP showing elevated levels of PFAS compounds in unspecified materials stored at the Site.

10. On June 30, 2022, Mass Natural voluntarily submitted 30 additional sampling results to MassDEP showing that most of the materials sampled on May 25 and June 2, 2022 at the Site contain one or more PFAS compounds at levels exceeding MCP standards. Specifically, the following materials all had exceedances of RCS-1 standards for at least one PFAS compound: landfill cover; golf course material; fiber biopellets; potting soil; compost; "turkey pad" materials; Greif paper; "windrow"; and Top Shelf (loam). The data were inconclusive for four other materials: Seaman paper, lettuce waste, tea leaves waste, and cannabis roots.

11. The UAO also required Mass Natural to submit a sampling plan for all the materials at the Site. MassDEP approved the sampling plan on June 30, 2022 and the approved sampling took place during a five-day period from July 7 to July 13, 2022. Using MassDEP-approved protocols, Mass Natural collected more than 150 samples for PFAS analysis.

12. Based on PFAS concentrations exceeding Imminent Hazard values in drinking water at the Site and in private wells off-site, and PFAS contamination in incoming, intermediate, and finished materials at the Site, MassDEP has determined that operation of the Site has caused or

poses a threat to public health and the environment, in violation of Paragraph VI.B.4. of the RCC Permit. Failure of any person to comply fully with an RCC permit is a violation of 310 CMR 16.01(8)(a)8, for which Mass Natural and Otter Farm are jointly and severally liable under 310 CMR 16.01(6).

13. M.G.L. c. 111, § 150A provides that MassDEP may rescind, suspend or modify a permit upon a determination that the operation or maintenance of the facility results in a threat to the public health and safety or to the environment. MassDEP has determined that operation or maintenance of the facility poses a threat to public health, safety, or the environment due to the presence of PFAS contamination in materials and groundwater on the Site and in over 100 private drinking water wells off-site.

14. The Site Assignment Regulations at 310 CMR 16.01(8)(b)2 provide that MassDEP may rescind, suspend, revoke, or modify an RCC permit whenever it has reason to believe that a violation of 310 CMR 16.00 has occurred.

15. The Site Assignment Regulations at 310 CMR 16.01(8)(b)1 provide that MassDEP may order the owner or operator to cease operations until the violation is corrected to the satisfaction of MassDEP, and/or to take appropriate remedial measures by a specified date to bring the Site into compliance or to protect public health, safety or the environment.

III. DISPOSITION AND ORDER

16. For the reasons stated above, and pursuant to the authority granted to MassDEP under the laws and regulations set forth above in Paragraph 4, MassDEP hereby **SUSPENDS** the RCC Permit, effective immediately.

17. For the reasons stated above, and pursuant to the authority granted to MassDEP under the laws and regulations set forth above in Paragraph 4, MassDEP hereby orders Mass Natural and Otter Farm to take the following actions:

- A. Effective immediately, cease composting operations at the Site; and
- B. Within 30 days of the date of this Order, submit to MassDEP for its review and approval a plan to take appropriate remedial measures to protect public health, safety, and the environment, including but not limited to removal of all materials listed in paragraph 10 above as exceeding PFAS standards from the Site.

18. Notwithstanding this Order, MassDEP reserves the right to exercise the full extent of its legal authority in order to obtain full compliance with all applicable requirements, including but not limited to referral to the Attorney General's Office for criminal prosecution or civil action including court-imposed civil penalties, or administrative penalties assessed by MassDEP.

19. Mass Natural and Otter Farm are advised that M.G.L. c. 111, § 150A provides that “[a]ny person, including any political subdivision of the commonwealth who violates this section, or any order issued pursuant thereto, or any rule or regulation promulgated hereunder (1) shall be subject to a fine of not more than twenty-five thousand dollars, or by imprisonment for not more than two years in a house of correction, or both, for each such violation; or (2) shall be subject to a civil penalty not to exceed twenty-five thousand dollars for each such violation.”

20. Mass Natural and Otter Farm are further advised that M.G.L. c. 21A, § 16 provides for civil administrative penalties of up to twenty-five thousand dollars (\$25,000.00) for each day after the issuance of this Order during which each violation covered by this Order continues or is repeated.

IV. APPEAL RIGHTS

21. This Order is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and must be received by MassDEP, as provided in 310 CMR 1.01, within twenty-one (21) days from the date of this Order.

22. Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts that are the grounds for the request, and the relief sought. Additionally, the request must state why the Order is not consistent with applicable laws and regulations.

23. The original hearing request must be mailed to:

Case Administrator
Office of Appeals and Dispute Resolution
Massachusetts Department of Environmental Protection
One Winter Street
Boston, Massachusetts 02108

A valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) for the filing fee must be mailed separately along with a completed Adjudicatory Hearing Fee Transmittal Form to:

Massachusetts Department of Environmental Protection
P.O. Box 4062
Boston, Massachusetts 02211

A copy of the transmittal form is attached for your convenience. A copy of the transmittal form and check should be sent to the Case Administrator at the address above.

In the Matter of Massachusetts Natural Fertilizer Company, Inc.
and Otter Farm Inc.
Enforcement Document #00013644
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A copy of the hearing request should be sent to:

Douglas Fine, Deputy Regional Director
Bureau of Air & Waste
Massachusetts Department of Environmental Protection
8 New Bond Street
Worcester, Massachusetts 01606

Failure to pay the filing fee as required is grounds for dismissal of the request for hearing. Upon a showing of undue financial hardship, MassDEP may waive the adjudicatory hearing filing fee. A person who believes that payment of the \$100.00 filing fee would be an undue financial hardship must file, together with the request for adjudicatory hearing as provided above, an affidavit setting forth the facts the appellant believes constitute the undue financial hardship.

24. Mass Natural and Otter Farm may also be subject to administrative or civil penalties for the past violations described in this Order. Questions regarding the contents of this Order should be directed to Douglas Fine, Deputy Regional Director, MassDEP, 8 New Bond Street, Worcester, Massachusetts 01606, or douglas.fine@mass.gov.

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

By: 
Mary Jude Pigsley, Regional Director
Central Regional Office
8 New Bond Street
Worcester, MA 01606

Date: 7/20/22

Exhibit B

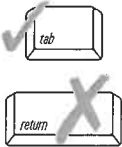


Adjudicatory Hearing Fee Transmittal Form

IMPORTANT! This form is intended for fee transmittal only. The contents of a request for an adjudicatory appeal (Notice of Claim) are established at 310 CMR 1.01(6) and the substantive statutes and regulations governing the Department's action.

A. Person/Party Making Request

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



1. Name and address of person or party making request:

Massachusetts Natural Fertilizer Company, Inc. & Otter Farm, Inc.

Name - If appropriate, name group representative

65 Bean Porridge Hill Road

Street Address

Westminster

MA

01437

City

State

Zip Code

2. Project Information:

65 Bean Porridge Hill Road

Street Address

Westminster

MA

01437

City

State

Zip Code

Administrative Order Enforcement Document #00013644

\$ 100

DEP File or ID Number

Amount of filing fee attached

ghailer@lawson-weitzen.com

Email Address

B. Applicant (if applicable)

1. Name and address of applicant:

Name - If appropriate, name group representative

Street Address

City

State

Zip Code

Email Address

C. Instructions

1. Send this form and check or money order of \$100.00 payable to the Commonwealth of Massachusetts to the MassDEP Lockbox at:

Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

2. Send a **copy** of this form and a **copy** of the check or money order with the Request for Adjudicatory Appeal (Notice of Claim) to:

Case Administrator
Office of Appeals and Dispute Resolution
One Winter Street
Boston, MA 02108

ENDOR:

LAWSON & WEITZEN, LLP

DATE PAID:

71815

August 08, 2022 Check Number 71815 Check Amount **100.00**

VOUCHER NO.	DESCRIPTION	DATE	INVOICE NO.	AMOUNT
20220808	Filing Fee -- MNF adjudicatory appeal	08/08/2022	24113.0490	100.00

CHECK AMOUNT

LAWSON & WEITZEN, LLP
 88 BLACK FALCON AVENUE, SUITE 345
 BOSTON, MA 02210



71815
 NUMBER

5-7515/110

One Hundred & 00/100

DATE
 August 08, 2022

AMOUNT
 100.00

PAY TO THE ORDER OF

Commonwealth of Massachusetts



[Handwritten Signature]

⑈071815⑈ ⑆011075150⑆ 61200015453⑈