



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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June 7, 2022

VIA ELECTRONIC MAIL  
([mnatural49@yahoo.com](mailto:mnatural49@yahoo.com))

William Page, Jr.  
President  
Massachusetts Natural Fertilizer Company, Inc.  
65 Bean Porridge Hill Road  
Westminster, MA 01473

Re: Massachusetts Natural Fertilizer Company, Inc. – MassDEP Comments on Proposed Stockpile Sampling Plan from Lessard Environmental, Inc. (Received by MassDEP May 24, 2022)

Dear Mr. Page:

The Massachusetts Department of Environmental Protection (“MassDEP”) has reviewed the proposed stockpile sampling plan received on May 24, 2022, dated June 23, 2022 [sic] (“Plan”) prepared by Lessard Environmental, Inc. for Massachusetts Natural Fertilizer Company, Inc. and provides the following comments broken down by task and subtask, where applicable, as proposed in the Plan, which were as follows:

- **Task 1: Stockpile Sampling and Laboratory Analysis**
  - a. *Incoming Staged Stockpile Sampling and Laboratory Analysis*
  - b. *Ready for Retail Sale Staged Stockpile Sampling and Laboratory Analysis*
  - c. *Staged Windrow Stockpile Sampling and Laboratory Analysis*
- **Task 2: Stockpile Materials Report**
- **General Comments**

**MassDEP Comments:**

Please address and incorporate the following comments into a revised Plan and submit that revised Plan to MassDEP no later than June 15, 2022, for review and approval.

**Task 1a: Stockpile Sampling and Laboratory Analysis - *Incoming Staged Stockpile Sampling and Laboratory Analysis***

1. All piles of incoming materials on-site shall be representatively sampled, including but not limited to short paper fiber separated by incoming source, incoming soil / excavation materials (i.e. clay, sand, etc.), potato chips, saw dust, brewery grain, cow manure, tea leaves, biopellets (if any is on site), lettuce material, rockwool, cannabis waste, ball jar material (diatomaceous earth filter cake), red mud, etc. When resubmitting the Plan for MassDEP review and approval, please include a full list of all incoming staged stockpiled materials that will be sampled as part of the Plan.
2. Stockpiled material shall be sampled via composite samples. One composite sample shall be collected for every 100 cubic yards of stockpiled material from each incoming source. Composite samples shall consist of at least nine (9) grab samples collected in a manner that renders the composite sample sufficiently representative of the stockpile. Each stockpile shall be divided into thirds with at least three (3) grab samples taken at the top, middle, and bottom of each stockpile. The nine grab samples shall be composited into a single sample for each stockpile and analyzed as specified in the Plan.

**Task 1b: Stockpile Sampling and Laboratory Analysis - *Ready for Retail Sale Staged Stockpile Sampling and Laboratory Analysis***

1. It is important that all outgoing products, including but not limited to 1/2" screened topshelf loam; 1/2" screened compost; potting soil; farm mix (unscreened compost); premium hemlock mulch; black mulch; tailings; stump grindings; and worm castings be representatively sampled as part of this Plan. When resubmitting the Plan for MassDEP review and approval, please include a full list of all ready for retail sale staged stockpiled materials that will be sampled as part of the Plan.

**Task 1c: Stockpile Sampling and Laboratory Analysis - *Staged Windrow Stockpile Sampling and Laboratory Analysis***

1. Staged windrow stockpiles shall be sampled via composite samples with one composite sample being collected for every 100 cubic yards of material, instead of the stated one sample per 500 cubic yards as outlined in the proposed sampling

plan received by MassDEP on May 24, 2022, with a minimum of one composite sample per windrow. Composite samples shall consist of at least nine (9) grab samples collected in a manner that renders the composite sample sufficiently representative of the stockpile. Each stockpile shall be divided into thirds with at least three (3) grab samples taken at the top, middle, and bottom of each stockpile. The nine grab samples shall be composited into a single sample and analyzed as specified in the Plan.

## **Task 2: Stockpile Materials Report**

1. The site plan, submitted as part of the post-sampling stockpile materials report, shall include a surveyed site plan showing, at a minimum, the locations of all stockpiled materials with each stockpile being labeled to adequately describe the materials contained within the stockpile. Where necessary, include the composition of the material in the stockpile (e.g., Red Mud is composed of insect excrement, tree bark, and diatomaceous earth or screened top shelf loam consists of composted short paper fiber, etc.).
2. The post-sampling stockpile materials report shall include labeled photographs of each stockpile taken at the time of the survey.
3. The post-sampling stockpile materials report shall be submitted to MassDEP within thirty (30) calendar days of the sampling event. However, the laboratory report containing the results of the analysis shall be submitted to MassDEP under separate cover as soon as the results are received.

## **General Comments:**

1. The Plan shall include a surveyed site plan showing, at a minimum, the locations of all stockpiled materials with each stockpile being labeled to adequately describe the materials contained within the stockpile. For stockpiles that consist of multiple different kinds of materials, include the composition of the material in the stockpile (e.g., "Red Mud" is composed of insect excrement, tree bark, and diatomaceous earth or screened top shelf loam consists of composted short paper fiber, etc.).
2. The resubmitted Plan shall also include labeled photographs that are representative of each stockpile taken at the time of the survey.
3. For development of your PFAS sampling protocol, please refer to the applicable sections of the following guidance documents: "Fact Sheet - Interim Guidance on Sampling and Analysis for PFAS at Disposal Sites Regulated under the Massachusetts Contingency Plan - October 21, 2020" (<https://www.mass.gov/doc/interim->

[guidance-on-sampling-and-analysis-for-pfas-at-disposal-sites-regulated-under-the/download](#)); and “MassDEP-Required Laboratory Procedures for Testing PFAS in Residuals - February 8, 2021” (<https://www.mass.gov/doc/required-laboratory-procedures-for-testing-pfas-in-residuals/download>).

4. Massachusetts Natural Fertilizer Company, Inc. shall provide MassDEP with 3 calendar days notice prior to commencing sampling events, so as to provide MassDEP sufficient notice for conducting a site visit during sampling activities.

Please note that MassDEP may require additional sampling rounds and/or require sampling of additional materials in the future if deemed necessary. Please contact me if you have any questions about anything contained in this response letter. MassDEP appreciates your cooperation in this very sensitive matter and looks forward to working with you to resolve this issue.

Sincerely,

  
James A. McQuade  
Section Chief  
Solid Waste Management Program

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