

O-5028-001
August 12, 2022

James McQuade
MassDEP
8 New Bond Street
Worcester, MA 01606

Re: **Stockpile Sampling Results Report and
UAO Material Management Plan Deadline
Massachusetts Natural Fertilizer Co.
Westminster, MA**

Dear Mr. McQuade:

In MassDEP's June 7, 2022, letter (Comments on Proposed Stockpile Sampling Plan), Item 3 under Task 2 states that "The post-sampling stockpile materials report shall be submitted to MassDEP within thirty (30) calendar days of the sampling event." As you are aware, the sample collection was completed over a span of five days, on July 7, 8, 11, 12 and 13, 2022. To date, we have received one laboratory report. As I explained in my email to Dan Guglielmi on July 19, 2022, we had the lab extract all of the samples but only analyze select samples due to concerns about the lab's ability to meet a Reporting Limit sufficient to evaluate PFAS concentrations against the Massachusetts Contingency Plan (MCP) RCS-1 values. Based on the limited data received to date, we have directed the laboratory to proceed with analyzing the remainder of the samples and they expect to report the outstanding data by August 19, 2022.

The Department's July 20, 2022, Unilateral Administrative Order (UAO) stipulates at Paragraph 17(B) that "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." Massachusetts Natural Fertilizer (MNF) will be unable to identify management options for the material stockpiled on-site without the pending laboratory data. Further, given the limited management options and facilities' apprehension to accept PFAS-containing materials, finding acceptable options will likely require significant time as well.

Therefore, MNF and Otter Farm request an extension of the above deadlines until September 16, 2022.

If you have any questions regarding this submittal, please contact the undersigned at 413.572.3227 or by email at jlarps@tighebond.com.

Very truly yours,

TIGHE & BOND, INC.



Jeffrey L. Arps, LSP
Vice President

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