



March 27, 2024

MassDEP CERO
Mr. James McQuade, Section Chief
8 New Bond Street
Worcester, MA 01606

Re: Notice of Noncompliance – Enforcement Document No. 00017618

Dear Mr. McQuade,

Please find the following responses, which detail the corrective actions that W. L. French has implemented at the Former Mabardy Landfill in response to your March 15, 2024, Notice of Noncompliance.

- 1. Within five calendar days, secure groundwater monitoring wells MW-3 and MW-4 so as to prevent tampering with or vandalism.*

All groundwater monitoring wells at the Site are now secured with locks.

- 2. Within 14 calendar days, submit to MassDEP a dust mitigation plan to ensure compliance with section IV, paragraph P of the CAD Approval to prevent nuisance dust conditions from developing at or emanating from the Facility.*

A Dust Mitigation Plan has been developed for the landfill closure project, and a copy is included in Attachment A.

- 3. Within 14 calendar days, maintain a daily wheel wash log for each day the Facility is operating. This log shall record the date the log was completed, the ambient temperature at the start of each operating day, the trucking company name, and the time that the truck utilizes the wheel wash. The log shall be*



maintained at the site and be available upon request by MassDEP and/or the Town of Winchendon.

A wheel wash log has been developed and implemented for the landfill closure project and a copy is included in Appendix B. A copy of the daily log is available for review at the landfill scale house or by request.

We will continue to ensure that the landfill closure project operates within the requirements and conditions of our permit. Please contact me on my cell phone at XXX-XXXX if you have any questions or concerns.

Sincerely,



William French Jr.
Manager
580 River Street, LLC

March 27, 2024

Date

Attachment A: Dust Mitigation Plan – Former Mabardy Landfill
Attachment B: Wheel Wash Daily Log – Former Mabardy Landfill

cc: James Abare, Health Agent, Town of Winchendon, Massachusetts, Board of Health, 109 Front Street, Dept 5, Winchendon, MA
jabare@townofwinchendon.com



Attachment A
Dust Mitigation Plan



Dust Mitigation Plan

580 River Street - Former Mabardy Landfill Winchendon, MA March 2024

This plan has been developed by W. L. French Excavating Corporation to prevent fugitive dust emissions generated from Site Operations during capping of the Former Mabardy Landfill located at 580 River Street, Winchendon, MA.

Site Activity	Dust Control Measures
Inbound Truck Traffic	<ul style="list-style-type: none">--Minimum daily street sweeping and increased frequency when a high volume of trucks is scheduled.-Observe local speed limits (25 mph) and onsite haul road limits (5 mph).-Water truck sprayed on haul roads during dry/windy (>20 mph avg wind speed) conditions.-Keep loads tarped until offloading occurs.
Outbound Truck Traffic	<ul style="list-style-type: none">-Trucks must exit through wheel wash when the daily and overnight ambient temperature is above 32 degrees Fahrenheit.-Minimum daily street sweeping and increased frequency when a high volume of trucks is scheduled, or wheel wash is not in operation due to temperature.- Observe local speed limits (25 mph) and onsite haul road limits (5 MPH).Water truck sprayed on haul roads during dry/windy (>20 mph avg wind speed) conditions.-Keep loads tarped if loaded.
Active Capping Area of the Landfill	<ul style="list-style-type: none">-Water truck sprayed on haul roads during dry/windy (>20 mph avg wind speed) conditions.-Water truck utilized to prevent dust on non-vegetated plateau areas during dry or windy conditions (>20 mph avg wind speed) on dry soil being tipped from trucks and dry soil being spread and/or compacted.-Minimize disturbances that can produce dust.-Keep trucks out of muddy areas to the extent possible.-Vegitate inactive fill areas.- Utilize tracking pads prior to trucks exiting landfill footprint.

Active Landfill Capping Area of the Landfill

W.L. French will install a weather station at the scale house, which includes an anemometer to monitor wind speeds at the landfill. When average wind speeds are greater than 20 mph, as measured at the weather station located at the scale house, the Site shall ensure the water truck cannons are actively dispersing water on dry soil being tipped from trucks and on dry soil being spread and/or compacted to mitigate dust emissions. The water truck(s) will be loaded from the quarry pond or the onsite water well.

Temporary vegetative cover materials shall be utilized whenever practical in inactive or elevated areas to mitigate dust generation and counter erosion caused by wind and water, prior to final cap placement.

Haul Roads

A water truck shall be utilized to ensure the haul roads will be kept damp without causing excessive ponding or runoff beyond the site boundaries. Note that the daily temperature must be above freezing when loading water trucks or applying water to the haul roads. If the ambient daily temperature is below 32 degrees Fahrenheit and the average wind speed is >20 mph, additional dust control measures, such as calcium, may be used as needed.

Wheel Wash Station

All trucks exiting the landfill shall utilize the wheel wash station to ensure that soil is not tracked offsite. The wheel wash station shall be in operation when the daily and overnight ambient temperature is above 32° Fahrenheit. When the ambient temperature is below 32° Fahrenheit, W. L. French shall implement alternative measures approved by MassDEP.

Street Sweeping

W. L. French shall ensure that street sweeping occurs at the access road and the roadways adjacent to the landfill on all days when construction takes place at the landfill and whenever roadway conditions deem it necessary (including but not limited to stormwater or contact water runoff and windblown debris on a roadway).



Attachment B
Wheel Wash Daily Log

Winchendon Wheel Wash Log			
 Former Mabardy Landfill 580 River Street	Date:		
	Inspector Name:		
Load	Truck Name (On Door)	Truck Registration	Time
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Winchendon Wheel Wash Log			
	Former Mabardy Landfill 580 River Street	Date:	
		Inspector Name:	
Load	Truck Name (On Door)	Truck Registration	Time
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