

August 8, 2018

CONSULTING
SERVICES

Ms. Sheila Page, Town Planner
Town of Ashland
Dept. Community Development & Health
101 Main Street
Ashland, MA 01721

RE: Ashland Solar Project
Counter Responses

CONTRACTING
SERVICES

Dear Ms. Page:

The following are Green Environmental, Inc.'s (GREEN) counter responses to comments submitted by Tighe & Bond to the Town of Ashland in their letter dated July 26, 2018.

1. GREEN would like a statement signed by a PE with the supporting engineering data and calculations showing that the ballasts won't have any effect on the cap.

WASTE
MANAGEMENT

Response:

A settlement analysis has been conducted for the Project, and is provided in Appendix A to this letter. The settlement analysis demonstrates that the Project will not have an adverse impact to the landfill cap.

Counter Response:

GREEN has reviewed the Tighe & Bond "Ashland Landfill PV Solar Array Bearing Capacity and Settlement Analyses" (dated July 26, 2018) and finds it satisfactory. However, given the topography hilly terrain, it may be in the Town's best interest to review calculations at a higher wind speed. Higher wind speeds can occur in the New England area, i.e., severe thunderstorms and hurricanes, and the site is located on top of a landfill.

To this end, has the Applicant considered tying/connecting the slab ballasts together, i.e., guy wire cables for additional stability and support?

CIVIL
ENGINEERING

2. GREEN would like to see a construction plan which includes sequencing and methods.

Response:

296 Weymouth Street, Unit C
Rockland, MA 02370

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SITE DESIGN

The proposed construction sequence for the solar array is as follows:

1. *Establish limit of work.*
2. *Install perimeter erosion control measures for Array 1 and Array 2.*
3. *Mark vents and other infrastructure on landfill cap.*
4. *Install construction access road on landfill*
5. *Remove and dispose of vegetation for Array 2 as shown on the drawings conduct selective vegetation management to east and southeast of Array 2.*
6. *Install intermediate erosion control barriers within Array 2.*
7. *Install access road to east of Array 2.*
8. *Install fence extension around Array 2 site.*
9. *Install stormwater management facilities.*
10. *Concurrently with installation of stormwater management facilities, commence installation of solar racking, panels, and electrical equipment.*
11. *Install electrical interconnection equipment.*
12. *Seed disturbed areas and stabilize site.*
13. *Install additional vegetative screening along MBTA Road as needed.*

Note that the selected contractor will have the ultimate determination of the sequence and methods of how to construct the solar array. The contractor will have to comply with all permit conditions and Town of Ashland, MassDEP and EPA requirements.

Counter Response:

Sequencing appears to be satisfactory.

3. GREEN would like to see a statement regarding positive drainage; that the water is getting where it is supposed to be.

Response:

Tighe & Bond has completed an updated design for the proposed stormwater management system for the Project. A Stormwater Design Update Memorandum has been provided to the Conservation Commission as the Permit Granting Authority for the Stormwater Permit, the Planning Board, and the Town's peer review consultant for stormwater matters, GCG Consultants, Inc. The Project complies with the MA Stormwater Management Regulations and the requirements for the Town of Ashland Stormwater Permit.

Counter Response:

GREEN is awaiting redesign documents.

4. Given Array 2's proximity to the cap and restored wetlands – is there any environmental data for this area? And if not, GREEN recommends soil testing to assure that the area is Clean before any work occurs.

Response:

Tighe & Bond consulted with the Department of Environmental Protection regarding available historic environmental data in the Array 2 area. This area is outside the limit of the Grant of Environmental Restriction and Easement (GERE). During the development of the GERE, extensive site investigations were conducted to determine the limits of the site contamination and area to be regulated by MassDEP and the Environmental Protection Agency. No environmental contamination was identified in the Array 2 area that warranted inclusion of this area in the scope of the GERE by MassDEP and/or EPA.

The Applicant's Contractor will develop a site-specific Health and Safety Plan (HASP) for work on both the Nyanza cap and this portion of the site. The HASP will address all hazards that are associated with the historic site contaminants and site excavation contractors will be made aware of the site history.

Site improvements have been designed in an attempt to minimize soil excavations on site. When excavation is required, no soil materials are intended to be removed from the site. Stumps that are removed during the grubbing operation will be ground/shredded on site and the material will be used within and around the Array 2 area for site stabilization.

Counter Response:

GREEN is comfortable with "zero export" from the site. However, suggest that there be a wash station at the site for trucks and vehicles coming in and out of the site.

If the Applicant considers to have "limited export", GREEN feels it prudent the Town of Ashland and Applicant have limited surface and subsurface environmental soil data to appease public concerns. Suggested testing parameters are: VOC 8260; SVOC 8270; Mercury; RCRA 8. Minimum of 3-6 locations. Soil testing should be limited surface to 20' depth (20' should cover depth of solar panel foundation).

5. GREEN will be recommending, in reference to the O&M plan, that any debris cleaned will also need to remain on site, so a debris area will need to be made/designated.

Response:

Comment noted and agreed. Site debris and soils will remain on site. The magnitude of site materials and exact location for these materials has not been determined but the Applicant recognizes that this will be a requirement.

Counter Response:

GREEN assumes the current O&M plan should continue to be followed.

Tighe & Bond and Town of Ashland to determine designated area on site for any debris.

6. GREEN recommends no chemicals in regard to the grass and vegetation be used.

Response:

The Applicant agrees that herbicides and pesticides will not be used to manage vegetation at the site.

Counter Response:

GREEN agrees. No further action required.

7. What are the current credentials required to get on site (i.e., 10-hour OSHA/40-hour OSHA certification)? The grass cutter will need this, if required.

Response:

The Applicant and Tighe & Bond are currently working with MassDEP and EPA through an approval process for the proposed Project. There is currently a Grant of Environmental Restriction and Easement (GERE) on the site and through the approval of this Project, an amendment to the GERE will be developed. That document will outline the requirements associated with the construction, operation and maintenance of the solar facility for the life of the Project. Since the site has been remediated and the landfill capped, it is anticipated that there will not be OSHA 10 or OSHA 40 requirements for maintenance of the site for the purpose of vegetation management where there is very little risk for contact with ground water contamination.

Counter Response:

GREEN's new position on credentials required is to follow current O&M plan as well as any new criteria set by the Town of Ashland.

Should you have any questions, please feel free to contact me directly at (617) 645-7710.

Sincerely,



Glenn C. Ferguson
Project Manager