



REGION 1

BOSTON, MA 02109

Dated By Electronic Signature

Nicholas Mucci, Business Development Director
Clean Earth, Inc.
933 First Avenue, Suite 200
King of Prussia, PA 19406
nmucci@cleaneearthinc.com

Subject: December 5, 2024 EPA Inspection of Adams Landfill

Dear Mr. Mucci:

On December 5, 2024, the U.S. Environmental Protection Agency ("EPA") performed an inspection at Adams Landfill, located on Crosby Road in Grafton, MA (the "Site"), to assess compliance with the National Pollutant Discharge Elimination System ("NPDES") program of the Clean Water Act. Copies of the inspection report and associated photolog are enclosed with this letter.

Discharges from the Site may require coverage under EPA's 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity¹ ("MSGP") and/or the 2022 Construction General Permit ("CGP")². These EPA permits include requirements to maintain best management practices ("BMPs"). Such BMPs may include, but are not limited to:

- Effective onsite detention basins, rain gardens, and or leach pits
- Utilization of silt fences and other erosion/sediment controls, especially surrounding unstabilized soils or active industrial processes
- Regular and post-precipitation erosion and sediment control inspections
- Preservation of existing vegetation whenever possible
- Timely stabilization of slopes and stockpiles

¹ Landfills that "receive or have received any industrial wastes" engage in "industrial activity." See 40 C.F.R. § 122.26(b)(14)(v).

² Construction activities generally require coverage under the 2022 CGP when such activities will (a) disturb one or more acres of land or will disturb less than one acre of land but are part of a common plan of development or sale that will ultimately disturb one or more acres of land, and (b) discharge stormwater to a water of the United States.

Within 30 calendar days of receipt of this letter, provide the information requested below. Please answer each question as clearly and completely as possible, and provide a response in an electronic format to the following technical contact:

Eleanor Horvath
horvath.eleanor@epa.gov

1. If the Site has a Stormwater Pollution Prevention Plan ("SWPPP"), **provide** a digital copy of the SWPPP.
2. **Describe** any industrial activity that may take place at the site after landfill closure is completed.
3. **Describe** the status of obtaining MSGP and/or CGP coverage for the Site.
4. If MSGP and/or CGP coverage has/have been obtained since EPA's December 5, 2024 inspection, **provide** the NPDES ID (beginning with "MAR") and the date on which the Notice of Intent(s) was/were submitted.
5. If you do not believe that the Site requires coverage under the 2021 MSGP and/or the 2022 CGP, **explain** this determination.

If you have any technical questions relating to this letter, please contact Eleanor Horvath of my staff at 617-918-1061 or horvath.eleanor@epa.gov. Legal issues may be directed to Jeff Kopf, Senior Enforcement Counsel, at 617-918-1796 or Kopf.jeff@epa.gov.

Sincerely,

NEWTON
TEDDER

Digitally signed by
NEWTON TEDDER
Date: 2025.01.21
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Newton Tedder, Manager
Water Compliance Section 1
Enforcement and Compliance Assurance Division

Enclosures:

Inspection Report
Photolog

CCs (electronic only):

Jeff Kopf, U.S. Environmental Protection Agency
Eleanor Horvath, U.S. Environmental Protection Agency