

**SOIL MANAGEMENT PLAN**  
**GREEN ACRES**  
**SOLAR THERMAL LOADING**  
**&**  
**SOIL ENHANCEMENT RECLAMATION PROJECT**

145/175 South Street  
Uxbridge, Massachusetts 01569



**Prepared for:**

Richardson North Corporation  
Uxbridge, MA 01569

## SITE PHOTO



**Prepared by:**

Agritech Inc.  
10 River Road  
Uxbridge, MA 02569

**Date:**

**February 18, 2015**

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- Appendix A Massachusetts Department of Environmental Protection (MassDEP), October 2, 2013 & Revised September 4, 2014, Similar Soils Provision Guidance, Guidance for Identifying When Soil Concentrations at a Receiving Location Are “Not Significantly Lower Than” Managed Soil Concentrations Pursuant to 310 CMR 40.00032(3), WSC#-13-500
- Appendix B Dust and Odor Control Plan, Green Acres Solar Thermal Loading-Field Enhancement Project
- Appendix C Soil Submittal Checklist and Soil Reuse Submittal Form

### 1. INTRODUCTION

This Soil Management Plan was prepared for the reclamation of a 45 acre gravel pit and the enhancement of crop production through Solar Thermal Loading increase, the removal of sand and gravel increased the shading of the site by lowering the grade by more than forty (40) feet. By importing fill materials and restoring the original grades the “shade impact” that has caused sub optimal growing conditions can be corrected. The owners were contemplating cutting trees to offset the shading impact, but have chosen instead to import reclamation soils preventing the cutting of over 750 trees. The importation of “Bio Mix” a short paper fiber and water treatment sludge blend was proposed to the Uxbridge Board of Health to offset the suboptimal growing conditions in January of 2015.

It was expected that the “Bio Mix” paper fibers would increase the water holding capacity of the underlying soils, which is important because it affects the supply of root-zone air, moisture, and nutrients available for plant uptake. Water-holding capacity is controlled primarily by soil texture and organic matter. Soils with smaller particles (silt and clay) have a larger surface area than those with larger sand particles, and a large surface area allows a soil to hold more water. In other words, a soil with a high percentage of silt and clay particles, which describes fine soil, has a higher water-holding capacity. The sandy soil that exists on site can be quickly recharged with soil moisture (field capacity to wilting point), but is unable to hold as much water as the natural soils with silt and clay that will be imported to correct this deficiency.

The town made the decision not to support the application of the Bio Mix, town approval for the importation of reclamation soils at this site in order to correct the water holding capacity and solar shading impact was granted in writing on June 27, 2015. The site is the Richardson North Corporation (Richardson) Gravel Pit at 145/175 South Street in Uxbridge, Massachusetts. The project location is shown on Figure 1 – Site Location Map.

This soil management plan has been prepared in accordance with and to meet the requirements outlined in the Massachusetts Department of Environmental Protection’s (MassDEP), Similar Soils Provision Guidance, Guidance for Identifying When Soil Concentrations at a Receiving Location Are “Not Significantly Lower Than” Managed Soil Concentrations Pursuant to 310 CMR 40.00032(3), WSC#-13-500. A copy of this guidance is provided as Appendix A. This plan will be reviewed periodically and updated as necessary to remain in compliance with the MassDEP regulations and policies and any changes as they are issued.

The reclamation project will involve the filling and grading of the site in approximate 5-acre increments to limit exposed soils and nuisance conditions. The site will be filled and contoured to the approximate original grade as shown on Figure 2 – Site Plan. Subsequent reclamation areas will be implemented to ultimately reclaim the entire site. It is anticipated that the entire reclamation project will take ten(10) years to complete based upon the size and volume of the area to be reclaimed, and projections of available volumes of reclamation soils available, and anticipated daily site operations. The project is estimated to require eight (8) million tons of reclamation soil to establish suitable final elevations that counter the water holding capacity of soils and the solar shade impact on crop production.

The reclamation project, upon completion of filling and grading of each phase is to be covered with one foot of organic material (Loam) and planted with hay or corn. The reclamation area is approximately 45 acres and will be restored to its approximate original elevations of 315 to 305 foot contours at the rim of the earth removal areas.

The source of the imported reclamation soils is expected to be unregulated excess soil from excavation and construction projects in Massachusetts, The fill material will include historic urban fill soil and native deposits of soil including sand, gravel, organic soils, estuarine deposits, marine sands, and Boston Blue Clay. Soil intended for reuse in the filling operation must meet Reclamation Reuse Criteria established by Mass DEP in policy WSC-13-500. The derivation of the Reclamation Reuse Criteria is explained herein. Testing of all soil prior to reclamation and/or

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additional documentation of the soil source(s) with background information is required prior to being accepted at Green Acres and is described herein.

The Town's Gravel Pit Inspector is allowed to enter the site at any time. In addition, based on recent discussions with the Town Manager, Chairman of the Board of Health, and Conservation Commission, permission has been granted by the project owners to allow Town Board members to access the project at any time. Therefore, reclamation operations will be subject to random inspections by the Gravel Pit Inspector, Board of Health, and/or Conservation Commission.

For the past 53 years, the site has been removing sand vegetating areas disturbed by earth removal and planting hay and corn. This site has no limitations on the types of soils accepted. (slurry, clay, peat, etc.)

A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented in accordance with the United States Environmental Protection (USEPA) National Pollutant Discharge Elimination System (NPDES) requirements for a Construction General Permit for disturbance of 1 acre or more of land if required.

This project has been discussed with various Town officials including the Town Manager, Selectmen, Board of Health, Traffic Control Division of the Police Department, Department of Public Works, and Conservation Commission, although the town has no soil by law requiring approval of this project the town has been well informed in regards to this reclamation project and has issued a letter of approval for the project. These discussions provided relevant information regarding the reclamation operations described within this plan so these officials have a general awareness of the project and ongoing site activities. It has been the opinion of local officials that they preferred the reclamation of the gravel pit and re development of agricultural fields rather importation of sludge and cutting down 750 trees.

For this project the owner elected to require the project to include an onsite third party professional working under the supervision of a Qualified Environmental Professional (QEP) to monitor incoming reclamation soils on a random basis, There are no existing or prior violations of MassDEP regulations or policies at this site. In addition, the project has secured Environmental Liability insurance for all reclamation soils in the amount of \$2 million per occurrence and \$10 million in aggregate, \$10 million umbrella, with a sunset of 5 years.

The project is expected to take approximately ten years to complete. The gravel pit has operated since before local zoning and has had no known violations or complaints filed against it by any municipal, state, or federal agencies. Therefore **Richardson North Corporation and Soils Incorporated certifies that this site is operating in accordance with all applicable federal, state, and local laws, regulations, policies and guidance for the placement, reuse, recycling, and/or reclamation of soil. This site is not a listed USEPA Superfund site.**

The project has negotiated a host community agreement that provides for a per-ton tipping fee paid to the town for all reclamation soils delivered to Green Acres.

## **1.1 PARTIES INVOLVED**

### **Project Location:**

Richardson North Corporation  
145/175 South Street  
Uxbridge, MA 01569  
Map 43, Lots 2079 and 3376.

### **Property Owner:**

Richardson North Corporation  
145/175 South Street  
Uxbridge, MA 01569

### **Observation of Reclamation Operations:**

Coneco Engineers & Scientists, Incorporated  
4 First Street  
Bridgewater, MA 02324  
Contact Person: Brian Klingler  
Email: <mailto:bklingler@coneco.com>

### **Review and Approval of Soil Submittal Packages:**

Coneco Engineers & Scientists, Incorporated  
4 First Street  
Bridgewater, MA 02324  
Contact Person: Brian Klingler  
Email: <mailto:bklingler@coneco.com>

### **Reclamation Project Operator**

Soils Incorporated  
10 River Road  
Uxbridge, MA 01569  
Phone: 508-278-2000  
Contact Person: Patrick Hannon  
Email: [phannon@agritechma.com](mailto:phannon@agritechma.com)

### **Site Massachusetts Certified Environmental Laboratory:**

New England Testing Laboratory, Inc. (NETLAB)  
1254 Douglas Avenue  
North Providence, RI 02904

### 1.2 SITE DESCRIPTION AND EXISTING CONDITIONS

The reclamation operation will take place on a portion of the depleted Richardson North Corporation gravel pit located at 145/175 South Street in the southwest portion of Uxbridge, Massachusetts. The Uxbridge/ RI line abuts the site. The center of Uxbridge is approximately 3 miles to the northeast. The reclamation site is readily accessed from State Highway Route 146 and Route 146A, one mile from the entrance to the site. Access to Interstate 90 is located approximately 15 minutes from the site via Route 146 off Route 146A.

Abutters to the site include the following:

- Several homes owned by the Richardson family
- The Ironstone Farm
- Forested woods
- Agricultural fields
- Two (2) Richardson Family Cemetery Sites

As identified on Figure 2, in addition to being isolated, the site also has significant vegetative screening and a soil berm along the perimeter of the property assisting with limiting noise, dust, and other nuisances commonly found with soil moving operations.

A plan recorded with the registry of deeds shows the property divided into two parcels:

- Parcel 1 being approximately 13.97 acres; and
- Parcel 2 being approximately 111.34 acres.

Parcel 1 and 2 contains the active gravel operation and reclamation area. Parcel 1 is mostly wooded and has had limited earth removal activities.

Priority habitat have been mapped on the site and adjacent areas; however the, project is located outside all resource protection areas and is exempt under agricultural use exemptions. A Habitat Management Plan for the maintenance and enhancement of habitat approved by NHESP has been obtained for this project.

### 1.3 SITE GROUNDWATER REPORTING CATEGORY

Per Section 310 CMR 40.0362(1) of the MCP, for the purpose of determining whether a notification obligation exists under 310 CMR 40.0315, measured dissolved concentrations of any oil or hazardous material listed at 310 CMR 40.1600 shall be compared to the Reportable Concentration value in the reporting category that best characterizes the site under evaluation, as described below:

- a) Reporting Category RCGW-1. Reporting category RCGW-1 shall be applied to all groundwater samples obtained:
  1. within a Current Drinking Water Source Area; or
  2. within a Potential Drinking Water Source Area.
- b) Reporting Category RCGW-2. Reporting category RCGW-2 shall be applied to all groundwater samples that are not obtained from category RCGW-1 areas.

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The MassDEP Bureau of Waste Site Clean-up (BWSC) Massachusetts Contingency Plan (MCP) Numerical Ranking System Map (Figure 3) indicates a portion of the site is located over a potentially productive aquifer. However, all filling will occur outside of the potentially productive aquifer.

Because the distance to a public water supply distribution pipeline is 500 feet or more and no portion of the parcel of land or facility is located less than 500 feet from a public water supply distribution pipeline, the groundwater is considered to be in a potential drinking water source area. Therefore, the applicable groundwater reporting category is RCGW-1 in accordance with the MCP.

### 1.4 SITE SOIL REPORTING CATEGORY

Per Section 310 CMR 40.0361(1) of the MCP, for the purpose of determining whether a notification obligation exists under 310 CMR 40.0315, measured concentrations of any oil or hazardous material listed at 310 CMR 40.1600 shall be compared to the Reportable Concentration value in the reporting category that best characterizes the current use of the site under evaluation, as described below:

- a) Reporting Category RCS-1. Reporting category RCS-1 shall be applied to all soil samples obtained:
  1. at or within 500 feet of a residential dwelling, a residentially-zoned property, school, playground, recreational area or park; or
  2. within the geographic boundaries of a groundwater resource area categorized as RCGW-1 in 310 CMR 40.0362(1)(a).
- b) Reporting Category RCS-2. Reporting category RCS-2 shall be applied to all soil samples that are not obtained from category RCS-1 areas.

Because the property is zoned Agricultural (AGR) as shown on Figures 4 and 5, and because it is located within the geographic boundaries of a groundwater resource area categorized as RCGW-1, the applicable soil reporting category is RCS-1.



## 2. SOIL RECLAMATION REUSE CRITERIA

The following Soil Reclamation Reuse Criteria have been established prior to the start of the reclamation project for various constituents in soil intended for use as reclamation material. The criteria were based on a review of the following:

- Available and applicable soil standards, guidelines, values, criteria, and background levels established by the MassDEP in various regulations;
- Site receptors and guidelines;
- MassDEP technical guidance documents including the “Similar Soils” policy;
- White papers and discussions with the Massachusetts LSP Association; and
- Discussions with MassDEP personnel.

### 2.1 SOIL SAMPLING CONSIDERATIONS

The soil proposed for reuse at this site should be sampled at sufficient and adequately distributed locations so that the concentrations of the contaminants of concern in the soil are adequately characterized. At a minimum sampling shall be performed in accordance with the criteria outlined in Section V of WSC 13-500 – Similar Soils Provision (310 CMR 40.0032(3)) Guidance. However, the Generator has the sole responsibility to determine the testing parameter and frequency of testing necessary to fully characterize the soils to ensure they meet the reuse criteria for this site. The rationale for establishing the sampling criteria shall be fully described for all sources of soil proposed for reuse at the site. Initial testing is required at the minimum frequencies presented in the following table:

	General Source/Origin Description	Minimum Test Profile Frequency
1	Naturally Deposited Soil: Not from an area of known or suspected high background levels of constituents; not proximate to urban fill soil; no MCP disposal sites nearby; and no industrial or manufacturing history.	1 test profile per 1,000 cubic yards (1,500-1,700 tons) for initial review. Supplemental testing of specific areas for specific contaminants that exceed any Soil Reclamation Reuse Criteria (SRRC) to define/confirm limits of acceptable soil at 1 test per 100 cubic yards.
2	Naturally Deposited Soil: In proximity to urban fill or an MCP disposal site.	1 test profile per 1,000 cubic yards (1,500-1,700 tons) for initial review. Supplemental testing of specific areas for specific contaminants that exceed any SRRC to define/confirm limits of acceptable soil at 1 test per 100 cubic yards.
3	Naturally Deposited Marine Soils and Boston Blue Clay: From areas of known or suspected naturally occurring high background levels of constituents or otherwise regulated soil.	1 test profile per 1,000 cubic yards (1,500-1,700 tons) for initial review. Supplemental testing of specific areas for specific contaminants that exceed any SRRC to define/confirm limits of acceptable soil at 1 test per 100 cubic yards.
4	Urban Fill Soil	1 test profile per 500 cubic yards (750-850 tons) for initial review. Supplemental testing of specific areas for specific contaminants that exceed any SRRC to define/confirm limits of acceptable soil at 1 test per 100 cu. yd. Additional test parameters such as cyanide and asbestos may be required.

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	General Source/Origin Description	Minimum Test Profile Frequency
5	Soil from Industrial, Commercial, or Manufacturing site with history of any of the following: tannery, textiles, chemical/paint production, circuit board manufacturing, plating/metal finishing, foundry operations, coal gasification, dry cleaning, salvage yards, pesticide/herbicide use, storage or distribution. An LSP, LSRP or LEP must provide a report detailing why such soils conform to the SSAC.	1 test profile per 500 cubic yards (750-850 tons) for initial review. Supplemental testing of specific areas for specific contaminants that exceed any SRRC to define/confirm limits of acceptable soil at 1 test per 100 cubic yards. Additional test parameters such as cyanide may be required.
6	Soil from sources not otherwise described above where historic test data indicate potential exceedance of any SSAC or where past use or storage of OHM at more than household quantities.	1 test profile per 500 cubic yards (750-850 tons) for initial review. Supplemental testing of specific areas for specific contaminants that exceed any SRRC to define/confirm limits of acceptable soil at 1 test per 100 cubic yards. Additional test parameters based on historic test data may be required.

For acceptance purposes, soil density will be considered 1.5 tons per cubic yard for soil sampled from a stockpile, and no greater than 1.7 ton per cubic yard for soil sampled in-situ via borings or test pits. Further technical justification will be required for acceptance of soil with assumed density greater than 1.7 ton per cubic yard.

### 2.2 SOIL CHEMICAL ANALYSES REQUIREMENTS

Chemical constituents within candidate soil must be below established Soil Reclamation Reuse Criteria. The following minimum analytical sampling shall be required for all incoming soils:

- Volatile Organic Compounds (VOCs) by EPA Method 8260;
- Semi-Volatile Organic Compounds (SVOCs) by EPA Method 8270;
- Total Metals (varies by Soil Category)
  - RCRA 8 Metals by EPA Methods 6010 and 7470 (for mercury), minimum required metals analysis for all Soil Categories;
  - PP-13 Metals by EPA Methods 6010 and 7470 (for mercury) [may be limited or excluded for Category 4 (Urban Fill) and Category 5 (Soil from industrial, commercial site with history of OHM use/storage), based on site history and QEP Opinion]; or,
  - MCP-14 Metals (PP-13 plus vanadium) by EPA Methods 6010, 7470 (for mercury) and 7010 (for thallium) [may be limited or excluded for Category 3 (Boston Blue Clay and Marine Soils) based on site history and QEP Opinion].
- Aroclor PCBs by EPA Method 8082;
- Chlorinated Pesticides by EPA Method 8081 (may be excluded or limited based on site history);
- Chlorinated Herbicides by EPA Method 8151 (may be excluded or limited based on site history);
- Total Petroleum Hydrocarbons (TPH) (summation of EPH fractions can be substituted);
- Reactivity (cyanide/sulfide) by EPA Method Ch. 7.3 (may be excluded or limited based on site history);
- pH/Corrosivity by EPA Method 9045;
- Ignitibility/flashpoint by EPA Method 1010 (may be excluded or limited based on site history);
- Any other potential constituents based on location-specific history.

Detection limits for all laboratory tests must be appropriate and adequate for evaluation and comparison to the Reclamation Reuse Criteria and justification for limiting or excluding any analyses, as allowed above, must be documented by the Qualified Environmental Professional (QEP). MassDEP CAM methods and levels must be utilized where applicable.

All soil must meet the Soil Reclamation Reuse Criteria as established herein. Averaging of concentrations will not be allowed to meet the Soil Reclamation Reuse Criteria, except as stated above. Soil containing a constituent at a concentration at or exceeding the Soil Reclamation Reuse Criteria will not be accepted.

### **2.2.1 Metals – Soil Categories 3, 4, and 5**

For soil characterized as Category 3 (Naturally Deposited Marine Soil and Boston Blue Clay), Category 4 (Urban Fill Soil), or Category 5 (soil from a commercial or industrial site) SMP, profile samples may be analyzed for RCRA-8 Metals by EPA Methods 6010 and 7470 (for mercury) in lieu of analysis of MCP14 or PP-13 Metals provided that the QEP submit supporting information and a technical justification demonstrating that limitation of metals analysis to RCRA-8 Metals is appropriate to characterize the Category 3, 4, and/or 5 soil for reuse acceptance. Such supporting information may include, but is not limited to, Site-specific information regarding the depositional environment and physical characteristics of the soil formation(s) and analytical data or other scientifically defensible documentation demonstrating that MCP-14 or PP-13 metals are not locally present above the reuse criteria in the specific naturally deposited marine soil formation(s) in question. The QEP shall provide the required technical justification and supporting documentation for RCRA-8 Metals analysis for Category 3, 4, and/or 5 soil as part of the soil reuse acceptance request package. The Generator has the sole responsibility for determining the technical justification for characterizing the Category 3, 4, and/or 5 soil with RCRA-8 Metals in lieu of MCP-14 or PP-13 based on Site-specific information. If the Generator determines that analysis of RCRA-8 Metals is appropriate for characterization of Category 3, 4, and/or 5 soils, frequency of testing for RCRA-8 Metals will remain one profile sample per 1,000 cubic yards for Category 3 soil, and one profile sample per 500 cubic yards for Category 4 and 5 soil. Upon receipt of soil at the Rolling Hills Project, Rolling Hills reserves the right to collect and submit soil samples for metals analysis to confirm compliance of the soil with the Reclamation Reuse Criteria. Soils exhibiting metals concentrations exceeding the reuse criteria are subject to rejection at the discretion of Rolling Hills.

### **2.2.2 Specific Conductance – Marine Soils and Boston Blue Clay**

For soil characterized as Naturally Deposited Marine Soil and Boston Blue Clay, identified as Category 3 soil under the Soil Management Plan (SMP), analysis of profile samples for Specific Conductance (Conductivity) by EPA Method SM2540 may be limited or excluded provided that the QEP submit supporting information and a technical justification demonstrating that exclusion or limitation of Conductivity analysis is appropriate to characterize the Category 3 soil for reuse acceptance. Such supporting information may include, but is not limited to, Site-specific information regarding the depositional environment and physical characteristics of the marine soil formation(s) and analytical data or other scientifically defensible documentation demonstrating that Conductivity data for local soils do not exceed the reuse criteria in the specific naturally deposited marine soil formation(s) in question. The QEP shall provide the required technical justification and supporting documentation for limiting or excluding Conductivity analysis from the soil profile as part of the soil reuse acceptance request package. The Generator has the sole responsibility for determining the technical justification for limiting or excluding Conductivity from the analytical profile for naturally deposited marine soils and Boston Blue Clay based on Site-specific information. Upon receipt of soil at the Green Acres Project, Green Acres reserves the right to collect and submit soil samples for Conductivity analysis to confirm compliance of the soil with the Reclamation Reuse Criteria. Soils exhibiting Conductivity data that do not comply with reuse criteria are subject to rejection at the discretion of Green Acres.

## **2.3 VISUAL, OLFACTORY, AND SCREENING CRITERIA**

All soil intended for reuse in the reclamation project will meet visual, olfactory, and field screening criteria prior to being accepted and/or placed at the site. Visual inspection of soil is to be performed at time of soil borings, test pits,

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stockpile sampling, and at time of excavation. Soil will exhibit no indication of staining or other discoloration indicative of a release or impact of oil or hazardous material or other nuisance conditions. It may contain no solid waste as defined by 310 CMR 19.00, MassDEP Solid Waste Regulations.

The reclamation site will have specific on-site controls for nuisance odors in compliance with the site-specific odor control plan. The odor control plan will include the application of either lime or placement of posi-shell on incoming soils as they are being placed as necessary to control and mitigate any potential nuisance odors from soils. A copy of the site specific "Dust and Odor Control Plan, Green Acres Project" for reclamation soils that cannot be treated at the generators site is provided as Appendix B. Soil with natural organic/hydrogen sulfide odor that is mixed with an odor reducing agent at the location of origin will be evaluated on a case-by-case basis. The Safety Data Sheet (SDS) for all odor-reducing products is required with soil submittal packages.

Soil must be field screened by the Generator for Total Organic Vapors following the MassDEP Jar Headspace Screening Procedure (MassDEP Policy #WSC-94-400), modified to be based upon an isobutylene response factor rather a benzene standard) at time of sample collection from borings, test pits, stockpiles or other locations. Soil must also be field screened at the time of excavation and load out to Immanuel at a frequency to be determined by the generator's QEP that adequately demonstrates consistency with headspace Reclamation Reuse Criteria. Soil must contain less than 10 parts per million volume (ppmv) total organic vapors (TOV) above ambient background by the jar headspace screening procedure to meet Reclamation Reuse Criteria.

### **2.4 VISUAL, OLFACTORY, AND SCREENING CRITERIA**

All soil intended for reuse in the reclamation project will meet visual, olfactory, and field screening criteria prior to being accepted and/or placed at the site. Visual inspection of soil is to be performed at time of soil borings, test pits, stockpile sampling, and at time of excavation. Soil will exhibit no indication of staining or other discoloration indicative of a release or impact of oil or hazardous material or other nuisance conditions. It may contain no solid waste as defined by 310 CMR 19.00, MassDEP Solid Waste Regulations.

The reclamation site will have specific on-site controls for nuisance odors in compliance with the site-specific odor control plan. The odor control plan will include the application of either lime or placement of posi-shell on incoming soils as they are being placed as necessary to control and mitigate any potential nuisance odors from soils. A copy of the site specific "Dust and Odor Control Plan, Green Acres Project" for reclamation soils that cannot be treated at the generators site is provided as Appendix B. Soil with natural organic/hydrogen sulfide odor that is mixed with an odor reducing agent at the location of origin will be evaluated on a case-by-case basis. The Safety Data Sheet (SDS) for all odor reducing products is required with soil submittal packages.

Soil must be field screened by the Generator for Total Organic Vapors following the MADEP Jar Headspace Screening Procedure (MADEP Policy #WSC-94-400), modified to be based upon an isobutylene response factor rather a benzene standard) at time of sample collection from borings, test pits, stockpiles or other locations. Soil must also be field screened at the time of excavation and load out to Agritech at a frequency to be determined by the generator's LSP that adequately demonstrates consistency with headspace Reclamation Reuse Criteria. Soil must contain less than 10 parts per million volume (ppmv) total organic vapors (TOV) above ambient background by the jar headspace screening procedure to meet Reclamation Reuse Criteria.

## **2.5 ADDITIONAL MATERIALS ACCEPTED**

Soil mixed with bentonite or other slurry material will be accepted. A description of the process and materials generating the soil with slurry must be provided. The SDS for all slurry and additive products must be submitted for review. If needed, pH must be adjusted to meet Reclamation Reuse Criteria prior to arrival at the reclamation site. Soil with slurry mixture is subject to field screening for pH upon arrival at the reclamation site.

Any other treated soils shall include a detailed description of the treatment processing (including treatment procedures, treatment chemicals and dosing information, and frequency of confirmatory sampling of treated material) SDS for all chemicals used in the treatment process, and a description describing why in the opinion of the QEP this treated soil is acceptable for reuse at this site.

In accordance with site requirements, no soil shall contain excessive free draining liquids during the time of loading, transportation, or arrival at the site. Soil containing excessive liquid shall be subject to rejection and removal from the site at the Owners discretion.

## **2.6 ADMINISTRATIVE CONTROLS**

In order to assure that soils imported to the site meet the requirements of this Soil Management Plan, the site owner and manager, Agritech Corporation has instituted the following administrative controls and on-site quality controls discussed in Section 4.0:

1. All soils imported to the Site shall be transported using a MassDEP Material Shipping Record (MSR);
2. A written opinion letter by the Qualified Environmental Professional (QEP), signed by the soil Generator and the Generator's environmental consultant shall be provided attesting to the representativeness of the soil characterization, a detailed description of the rationale for the proposed soil sampling plan, compliance with the Site's soil management plan, and adequacy of such soil for placement at the Site. The QEP must be a Massachusetts Licensed Site Professional (LSP), Connecticut Licensed Environmental Professional (LEP), or New Jersey Licensed Site Remediation Professional (LSRP). This requirement applies to all soils accepted for reclamation at the site.

In addition to the administrative controls, Agritech, Inc. has developed a standardized QEP opinion form entitled "Request for Approval for the Importation of Soils to the "Green Acres Reclamation Project", which shall be signed, by both the Generator and the Generator's QEP (which again shall be an LSP, LEP, or LSRP), prior to submittal to Agritech, or its designated agent, for approval. A copy of this opinion form is provided as Appendix C.

## **2.7 ACCEPTANCE CRITERIA**

The Acceptance Criteria for the site is described in further detail below.

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### 2.7.1 MCP Regulated Soils

Based on the future use of the Project location for agricultural purposes, soils generated from an active MCP (310 CMR 40.0000) must be below the established Reclamation Reuse Criteria summarized in the table below.

Category	Reuse Criteria
VOCs (EPA 8260)	List analytes individually, with criteria based on 1/10 RCS-1.
SVOCs (EPA 8270)	Current Version of Similar Soils Policy Table 2 for analytes listed in Table 2; and for analytes not listed in Table 2, criteria are based on 1/10 RCS-1.
EPH	Each carbon range 1/2 RCS-1. Target analytes from Current Version of Similar Soils Policy Table 2.
TPH	1/2 RCS-1
Chlorinated Pesticides (EPA 8081)	1/10 RCS-1
Chlorinated Herbicides (EPA 8151)	1/10 RCS-1
PCBs (EPA 8082)	1/10 RCS-1 for total PCBs
RCRA 8 Metals	Current Version of Similar Soils Policy Table 2
PP-13 Metals	Current Version of Similar Soils Policy Table 2
MCP-14 (with Vanadium)	Current Version of Similar Soils Policy Table 2
Hexavalent Chromium	Current Version of Similar Soils Policy Table 2
Specific Conductance (EPA SM2540)	2000 µmhos/cm (1/2 Comm 97 limit)
Flashpoint (EPA 1010)	>140
pH/Corrosivity (EPA 9045)	5.0-11.0
Reactive Sulfide/Cyanide (EPA Ch. 7.3)	500/250
PID SCREENING	<10 ppmv

In addition, in accordance with the MassDEP “Similar Soils” policy, soil that is acceptable for placement at the site must also meet the following four basic requirements:

- A. The Managed Soil Must Not Be a Hazardous Waste
- B. The Managed Soil Must Be Less Than Reportable Concentrations (RCs).
- C. The Managed Soil Must Not Create a Notifiable Condition at the Receiving Location.
- D. The Managed Soil Must Not Be Significantly More Contaminated Than the Soil at the Receiving Location.

Refer to the Similar Soils policy included in Appendix A for a more detailed description of each of the four requirements. The Generator is responsible for detailing in the QEP letter how the proposed soils meet each of these requirements.

## SOIL MANAGEMENT PLAN – GREEN ACRES FIELD RECLAMATION PROJECT

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Soils shall not contain any solid waste as defined by 310 CMR 19.00 including, but not limited to wood, metal, wire, plastic, textile, ceramic, ash, tires, pipes, or other debris determined to be solid waste. Incidental debris (<5% by volume) may be considered for acceptance on a case-by-case basis.

### 2.7.2 Non MCP Regulated Soils

Soils generated from any Non MCP regulated site must be below the established Reclamation Reuse Criteria. For the purposes of this soil management plan, the established Reclamation Reuse Criteria for Non MCP Regulated Soils shall be the current Reportable Concentrations for category RCS-1 soils. All concentrations for incoming Non MCP regulated soils shall be below the RCS-1 standards.

In accordance with the MCP, Non MCP soils are not regulated by the MassDEP; however soil that is acceptable for placement at the Site must also meet the following three basic requirements:

- A. The Managed Soil Must Not Be a Hazardous Waste
- B. The Managed Soil Must Be Less Than Reportable Concentrations (RCs).
- C. The Managed Soil Must Not Create a Notifiable Condition at the Receiving Location.

The Generator is responsible for detailing in the QEP letter how the proposed soils meet each of these requirements.

Soils shall not contain any solid waste as defined by 310 CMR 19.00 including, but not limited to wood, metal, wire, plastic, textile, ceramic, ash, tires, pipes, or other debris determined to be solid waste. Incidental debris (<5% by volume) may be considered for acceptance on a case-by-case basis.

### 2.7.3 General Requirements

Reclamation Reuse of both MCP Regulated and Non MCP regulated soil for placement at the site constitutes permission by the Generator for Soils Incorporated and its environmental consultant to request additional confirmatory soil sampling at the location of generation or to cease Reclamation Reuse of any suspect material at any time.

If the concentration of any compound or compounds reported in the analytical results from the confirmatory soil sample are deemed, in the sole opinion of Soils Incorporated's environmental consultant, to be significantly higher than the concentrations of the same compound or compounds declared in the Generator's QEP's opinion, Soil Incorporated may, at its sole discretion, attempt to resolve the discrepancy with the Generator. Such resolution may involve additional sampling of the soil at the Generator's location for such compound or compounds, or other resolution that is deemed acceptable to the Generator, Soils Incorporated, and its environmental consultant.

GREEN ACRES RESERVES THE RIGHT TO DECLINE TO ACCEPT ANY SOIL WHICH, IN ITS QEP'S SOLE OPINION, IT BELIEVES SHOULD NOT BE PLACED AT THE PROJECT.

## 2.8 SOIL PLACEMENT

Incoming trucks will be directed to the designated fill area on the site. Based on the source of the soil, trucks will be directed to the active phase of the project.

Green Acres does have the ability to provide dedicated space or a separate "area" for the placement of reclamation soils from any generator that desires to not have their material placed above or below any other generator for greater control.

### **3. ON SITE QUALITY CONTROL**

Each truck will be weighed on a certified scale upon arrival at Green Acres Reclamation Project and again after dropping the load (unless truck tare weight was previously recorded in the scale program). A net weight will be provided on a scale ticket to each truck leaving the site. Operating hours are 7 am to 5 pm Monday through Saturday.

The following quality control procedures will be used once the soil arrives at the Site.

1. Green Acres, through its environmental consultant (Coneco), will provide random on-site supervision of incoming soils transported to the site by a Resident Project Representative (RPR). The RPR will be responsible for the visual and olfactory inspection of incoming soils before final placement in the fill area.
2. The RPR will observe random loads of soil as it is off loaded. If, in the opinion of the RPR, any load being observed fails the olfactory examination it will immediately be field screened for headspace using a photoionization detector (PID), if the suspect load exceeds 10 ppmv for headspace the soil will have failed Reclamation Reuse Criteria and be recorded in the RPR's field log that the load has failed, and the load will be immediately moved to the designated quarantine area. The RPR will contact the transporter's representative and notify them of the failed load and offer the following options:
  - A. Ship the failed load back to the generator's site on the next truck inbound; or
  - B. Have the generators QEP come to the site and sample the failed load for analysis by a certified Massachusetts laboratory.

To further demonstrate a level of quality assurance and compliance with this soil management plan an RPR, working under the direction of the project QEP, will make random site visits in addition to the monthly inspection observing the importation and placement of both MCP and Non MCP soils.



#### 4. SOIL SUBMITTAL AND APPROVAL PROCESS

A Soil Submittal Package must be provided by representatives of each soil source/origin for review and approval by representatives of the Green Acres project.

A complete package is to be provided to:

Soils Incorporated  
10 River Road  
Uxbridge, MA 01569  
Contact Person: Patrick Hannon  
Email: [phannon@similarsoils.com](mailto:phannon@similarsoils.com)

Coneco Engineers & Scientists, Incorporated  
4 First Street  
Bridgewater, MA 02324  
Contact Person: Brian Klingler  
Email: [mailto:bklingler@coneco.com](mailto:mailto:bklingler@coneco.com)

Green Acres will perform a preliminary review to establish whether the submittal is complete and soil is appropriate for reuse as reclamation material at Green Acres. Coneco will then assign a Profile Number for final review and approval of the submittal.

Upon completion of the initial review, supplemental information, clarification, or additional delineation/frequency testing can be requested prior to Reclamation Reuse. The source making the submittal must provide the information, clarification, or additional test data as requested for the approval process to proceed.

Upon completion of the submittal review process and determination that the soil meets Reclamation Reuse criteria, a Reclamation Reuse Letter will be issued. The Reclamation Reuse Letter will reference the assigned Profile Number, will state a review of information as provided was performed and found adequate and appropriate for Reclamation Reuse, the quantity of soil that is approved, samples/soils that are not acceptable, and any other conditions applicable to the Reclamation Reuse of the soil. Soil submittal packages and Approval Letters will be retained by Coneco and the review consultant.

The review process will typically take from 1 to 4 business days depending on the number of submittals in the queue for review and the amount of soil requested for approval. Submittal packages awaiting supplemental information will be placed back into the review queue. Supplemental review will start once all required information is received.

All submittals must be complete at time of submittal. No partial packages with information to be submitted later will be considered for review. No preliminary reviews of data summaries will be performed.

A complete submittal package must contain the following:

- Soil Submittal Checklist;
- Soil Reuse Submittal form completely filled out and signed by the Generator and the Generators QEP;
- LSP/QEP Opinion Letter stating relevant site history and use;
- A statement that the soil requested for reclamation at Green Acres Reclamation Project meets the Reclamation Reuse Criteria established in this plan, or other explanations as needed;
- Appropriate Shipping Papers signed by QEP and Generator;

## SOIL MANAGEMENT PLAN – GREEN ACRES FIELD RECLAMATION PROJECT

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- Laboratory test data reports with Chain of Custody and QA/QC for the soil samples intended for reuse at Green Acres. Sample data representative of soil not intended for Green Acres must not be included in submittal packages;
- A Data Summary Table comparing source-specific soil test data to Green Acres Reclamation Project Soil Reclamation Reuse Criteria. For values below the detection or minimum reporting limit, the limit should be identified. For example ND < 20 mg/kg, or < 20 mg/kg must be in the summary table. Stating ND alone is not acceptable; and
- Supplemental site investigation reports or information supporting Reclamation Reuse of subject soil at the Green Acres Reclamation Project.

Copies of the Soil Submittal Checklist and Soil Reuse Submittal Form are provided as Appendix G. Soil Reclamation Reuse Criteria for “MCP Regulated Soils” and “Non MCP Regulated Soils” are referenced herein.

The assigned Profile Number must be placed at the top center of each page of the intended shipping papers. Trucks will not be allowed access to Green Acres Reclamation Project without the Profile Number on shipping papers.

## FIGURES

## **APPENDIX A: MASSDEP GUIDANCE DOCUMENT**

## APPENDIX B: DUST AND ODOR CONTROL PLAN

**APPENDIX C: SOIL SUBMITTAL CHECKLIST AND  
SOIL REUSE SUBMITTAL FORM**

**GREEN ACRES – 145/175 SOUTH STREET, UXBRIDGE, MASSACHUSETTS  
SOIL REUSE SUBMITTAL PACKAGE CHECKLIST**

**Required Information Checklist (check box if "yes"):**

<input type="checkbox"/>	Is there 1 test profile for every 500 cubic yards (Category 4, 5, and 6 soils); or 1 test profile for every 1,000 cubic yards (Category 1, 2, or 3 soils)
<input type="checkbox"/>	Is there 1 supplemental test for every 100 cubic yards, for specific areas/contaminants that exceed reuse criteria to define/confirm limits of acceptable soils?
<input type="checkbox"/>	Is there a signed and stamped QEP Opinion letter stating that the soil meets acceptance criteria, including required statements listed in the Application Form?
<input type="checkbox"/>	Does the QEP Opinion letter describe current and former site usage/history justifying the applicable Category?
<input type="checkbox"/>	Does the QEP Opinion letter describe site contaminants?
<input type="checkbox"/>	Is material treated soils? If yes, does the QEP letter justify why the treated soils is acceptable for reuse? Is a description of the treatment process, procedures, chemicals used, Safety Data Sheet for chemicals used in the treatment process?
<input type="checkbox"/>	Is a site sketch included? Does it identify soil source location and sample locations?
<input type="checkbox"/>	Is material free of visual signs of impact or nuisance conditions, such as staining and discoloration?
<input type="checkbox"/>	Is material free of solid wastes?
<input type="checkbox"/>	Is field screening data from the time of sample collection provided?
<input type="checkbox"/>	Is sample data from grab samples (required for comparison to acceptance criteria)?
<input type="checkbox"/>	Is there a data table(s) comparing the laboratory analytical results to the applicable Green Acres Project acceptance criteria referenced in the Soil Management Plan? Are non-detect analytical results identified as below the respective reporting limit (e.g., <0.3 mg/kg or ND (<0.3 mg/kg) instead of ND or BDL) or are reporting limits identified for each non-detect result? In the case of PCBs, the non-detect result shall be presented as the greatest reporting limit for the individual Aroclors.
<input type="checkbox"/>	Are the reporting limits for all analyses lower than the maximum acceptable levels listed in Soil Management Plan?
<input type="checkbox"/>	Are complete copies of the laboratory data, chain(s) of custody, and the QA/QC package for the analysis performed included?
<input type="checkbox"/>	If there is data for any sample(s) that are included with the submitted laboratory reports that are <u>not</u> part of the material package and should be disregarded during our review, are they crossed-out in the submittal and is there a statement in the QEP Opinion letter explaining why the data should not be considered in the review?
<input type="checkbox"/>	Was TCLP testing performed for metals or organic compounds when the total concentrations in the material are above the theoretical (20:1) levels?
<input type="checkbox"/>	Is asphalt, brick, and/or concrete mixed with reclamation materials?
<input type="checkbox"/>	Is bentonite or other slurry material mixed with reclamation materials? If yes, is a description of the process and materials generating the slurry provided? Is a Safety Data Sheet provided?
<input type="checkbox"/>	Is material treated soils? If yes, is a description of the treatment process, procedures, chemicals used, Safety Data Sheet for chemicals used in the treatment process, and a description of why the soils are acceptable for reuse provided in the QEP Opinion letter?
<input type="checkbox"/>	Is there a signed and stamped Material Shipping Record? Does the quantity of material requested for acceptance match the quantity listed on the MSR?
<input type="checkbox"/>	Is there a signed Material Approval Application Form with all fields completed?

Print Name

Signature

Title

Date

**GREEN ACRES PROJECT – 145/175 SOUTH STREET  
UXBRIDGE, MASSACHUSETTS  
SOIL REUSE APPLICATION FORM**

Instructions: Complete this form with required attachments and submit via email to [approvals@similarsoils.com](mailto:approvals@similarsoils.com) and submit a hard copy by USPS, FEDEX, or UPS to the following location. Typically, one (1) to four (4) business days will be required to review a Material Approval Application Form once received by the project engineer. One form shall be submitted per source.

**Point of Contact:**

Green Acres  
10 River Road  
Uxbridge, MA 01569  
Telephone: 508-278-2000  
[approvals@similarsoils.com](mailto:approvals@similarsoils.com)

**PROFILE NUMBER** (Assigned by Green Acres):

**SECTION A: GENERAL INFORMATION**

<b>Project Name:</b>	<b>Release Tracking Number or Site ID No. (if applicable):</b>
<b>Site Location/Address:</b>	<b>Site or Sub-Area Identifier (if applicable):</b>
<b>Generator Owner's Name/Address:</b>	<b>Contact Person for Material Approval:</b> Name: Company: Address:  Email: Telephone: Fax:
<b>Estimated Quantity of Material for Approval:</b>	<i>Cubic Yards</i> _____ <i>Tons</i> _____
<b>Anticipated Shipping Duration:</b>	Start / / 201_ End / / 201_

**SECTION B: GENERAL INFORMATION**

<b>Current and Former Site Usage:</b>	
<b>Has the Generator used Due Diligence in Characterizing the Material (circle one):</b>	
NO	YES
<b>Is this material classified as hazardous material under RCRA?</b>	
NO	YES

**Classify Soil Type for Approval**

Check Box	Category	General Source/Origin Description	Minimum Test Profile Frequency
<input type="checkbox"/>	1	Naturally Deposited Soil: Not from an area of known or suspected high background levels of constituents; not proximate to urban fill soil; no MCP disposal sites nearby; and no industrial or manufacturing history.	1 test profile per 1,000 cubic yards. Supplemental delineation testing at 1 test per 100 cubic yards.
<input type="checkbox"/>	2	Naturally Deposited Soil: In proximity to urban fill or an MCP disposal site.	1 test profile per 1,000 cubic yards. Supplemental delineation testing at 1 test per 100 cubic yards.
<input type="checkbox"/>	3	Naturally Deposited Marine Soils and Boston Blue Clay: From areas of known or suspected naturally occurring high background levels of constituents or otherwise regulated soil.	1 test profile per 1,000 cubic yards. Supplemental delineation testing at 1 test per 100 cubic yards.
<input type="checkbox"/>	4	Urban Fill Soil	1 test profile per 500 cubic yards. Supplemental delineation testing at 1 test per 100 cubic yards. Additional parameters such as cyanide and asbestos may be required.
<input type="checkbox"/>	5	Soil from an Industrial, Commercial, or Manufacturing site with history of any of the following: tannery, textiles, chemical/paint production, circuit board manufacturing, plating/metal finishing, foundry operations, coal gasification, dry cleaning, salvage yards, pesticide/herbicide use, storage or distribution. An LSP, LSRP, or LEP much provide a report detailing why such soils conform to the acceptance criteria.	1 test profile per 500 cubic yards. Supplemental delineation testing at 1 test per 100 cubic yards. Additional parameters such as cyanide may be required.
<input type="checkbox"/>	6	Soil from sources not otherwise described above where historic test data indicate potential exceedance of any SSAC or where past use or storage of OHM at more than household quantities.	1 test profile per 500 cubic yards. Supplemental delineation testing at 1 test per 100 cubic yards. Additional parameters based on historic data may be required.



**SECTION C: FIELD & LABORATORY ANALYSES**

Check all applicable field & laboratory analyses performed on the material to be reused

<input type="checkbox"/>	VOCs, SVOCs, PCBs, TPH (or summation of EPH fractions)	Required for Categories 1, 2, 3, 4, 5, 6
<input type="checkbox"/>	RCRA 8 Metals	Required for Categories 1, 2, 3, 4, 5, 6
<input type="checkbox"/>	PP-13 Metals	May be excluded or limited based on site history
<input type="checkbox"/>	MCP 14 Metals	May be excluded or limited based on site history
<input type="checkbox"/>	TCLP Metals	Required if total results exceed theoretical levels where TCLP criteria are met/exceeded
<input type="checkbox"/>	Chlorinated Pesticides	May be excluded or limited based on site history
<input type="checkbox"/>	Chlorinated Herbicides	May be excluded or limited based on site history
<input type="checkbox"/>	Reactive Cyanide/Sulfide	May be excluded or limited based on site history
<input type="checkbox"/>	pH/Corrosivity	Required for Categories 1, 2, 3, 4, 5, 6
<input type="checkbox"/>	Ignitability/Flashpoint	May be excluded or limited based on site history
<input type="checkbox"/>	Specific Conductance	May be excluded or limited based on site history
<input type="checkbox"/>	Other laboratory analyses performed (describe):	
<input type="checkbox"/>	Field screening (describe):	

**SECTION D: ADDITIONAL SAMPLE INFORMATION**

Physical Description (gravel, sand, silt, peat, etc.)

Location of Sample at Time of Testing	<input type="checkbox"/>	In-Situ
	<input type="checkbox"/>	Stockpile

**SECTION E: ANALYTICAL REUSE ACCEPTANCE CRITERIA**

Check applicable category:

<input type="checkbox"/>	<b>Soils Meet Acceptance Criteria for MCP Regulated Cell</b>	
	VOCs	Individual analytes are at or below 1/10 RCS-1
	SVOCs	Individual analytes are at or below Table 2 of Similar Soils Policy; or are at or below 1/10 RCS-1 (if not listed in Table 2)
	TPH/EPH	at or below 1/2 of RCS-1 (TPH); or each carbon range at or below 1/2 of RCS-1; see SVOCs for target analytes
	Chlorinated Pesticides	Individual analytes are at or below 1/10 RCS-1
	Chlorinated Herbicides	Individual analytes are at or below 1/10 RCS-1
	PCBs	Total PCBs are at or below 1/10 RCS-1
	Metals	Individual analytes are at or below Table 2 of Similar Soils Policy
	Specific Conductance	2000 umhos/cm (1/2 Comm 97 limit)
	Ignitability/Flashpoint	>140
	pH/Corrosivity	5.0-11.0
	Reactive Cyanide/Sulfide	500/250
	Asbestos Fibers	<1
	PID Screening	<10 ppmv
<input type="checkbox"/>	<b>Soils Meet Acceptance Criteria for Non MCP Regulated Cell</b>	
	VOCs	Individual analytes are below RCS-1
	SVOCs	Individual analytes are below RCS-1
	TPH/EPH	TPH or individual carbon ranges are below RCS-1; target analytes below RCS-1
	Chlorinated Pesticides	Individual analytes are below RCS-1
	Chlorinated Herbicides	Individual analytes are below RCS-1
	PCBs	Individual analytes are below RCS-1
	Metals	Individual analytes are below RCS-1
	Specific Conductance	2000 umhos/cm (1/2 Comm 97 limit)
	Ignitability/Flashpoint	>140
	pH/Corrosivity	5.0-11.0
	Reactive Cyanide/Sulfide	500/250
	Asbestos Fibers	<1
	PID Screening	<10 ppmv

**SECTION F**

**QEP Opinion Letter (Required Statements):** Attach a letter from a Qualified Environmental Professional (must be LSP in Massachusetts, LEP in Connecticut, or LSRP in New Jersey) indicating they have reviewed the analytical data and have formed the opinion that the soil is suitable for reclamation reuse at the Green Acres Project. At a minimum the Letter MUST contain the following statements:

- "In my opinion, the analyses performed and submitted for review are sufficient to adequately characterize the identity and concentrations of contaminants in the [Identify Material by stating Category Number and corresponding General Source/Origin Description] proposed at the Green Acres Soil Enhancement Reclamation Project in Uxbridge, Massachusetts."
- "Based on my review of the attached data, it is my opinion as a Qualified Environmental Professional that the [Identify Material by stating Category Number and corresponding General Source/Origin Description] is appropriate for reclamation reuse for the Green Acres Soil Enhancement Reclamation Project in Uxbridge, Massachusetts."

**SECTION G**

Additional Information / Comments

**SECTION H**

Generators Signature: The Generator or duly authorized representative of the Generator shall sign and date this Soil Reuse Approval Application Form certifying the following:

"To the best of my knowledge, I certify the information contained herein is a true and accurate description of the waste material requested for reclamation reuse at the Green Acres Soil Enhancement Reclamation Project. I further certify that by submitting this profile, neither myself nor any other employee of the company will deliver for reclamation reuse or attempt to deliver any waste which is classified as toxic waste, hazardous waste, infectious waste, or any other material this facility is prohibited from accepting by law. I further certify that the company had not altered this form or its content in any way as provided by the Green Acres Soil Enhancement Reclamation Project.

Printed Name

Signature  
Date

Date

**SOIL MANAGEMENT PLAN – ROLLING HILLS PLANNED HABITAT PROJECT**

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