



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

May 8, 2015

Mr. Evan Slavitt
AVX Corporation
801 17th Avenue South, P.O. Box 867
Myrtle Beach, SC 29578

RE: **NEW BEDFORD**
Release Tracking Number: 4-0000601
Former Aerovox Facility
740 Belleville Avenue
**REQUEST FOR IMMEDIATE RESPONSE
ACTION (IRA) STATUS REPORT
INTERIM DEADLINE
EXTENSION OF PHASE II DEADLINE**

Dear Mr. Slavitt:

The Massachusetts Department of Environmental Protection (MassDEP or the Department), Bureau of Waste Site Cleanup is tasked with ensuring the cleanup of oil and hazardous material releases pursuant to the Massachusetts Oil and Hazardous Material Release Prevention and Response Act (M.G.L. Chapter 21E). The law is implemented through regulations known as the Massachusetts Contingency Plan (310 CMR 40.0000 et seq. – the MCP). Both M.G.L. c. 21E and the MCP require the performance of response actions to provide for the protection of harm to health, safety, public welfare and the environment which may result from releases and/or threats of releases of oil and/or hazardous material at disposal sites.

Through the MCP, MassDEP is currently regulating a release of oil and/or hazardous material that has occurred at the former Aerovox property located at 740 Belleville Avenue, New Bedford, Massachusetts (the Site), to which MassDEP has assigned Release Tracking Number (RTN) 4-0000601. AVX Corporation (AVX) has been identified as a Potentially Responsible Party (PRP).

On September 12, 2014, MassDEP issued a Request for Immediate Response Action (IRA) Plan Modification Letter to you (as used in this letter “you” and “yours” refers to AVX Corporation) requesting that you submit an IRA Plan Modification to address the Condition of Substantial Release Migration (SRM) identified by MassDEP in that letter by a November 7, 2014 Interim Deadline. The Request for IRA Plan Modification issued by MassDEP required that the IRA Plan Modification be designed to contain the contaminants identified in the subsurface, west of the sheet pile cutoff wall, on the landward portion of the Site.

On October 1, 2014, Marilyn Wade of URS Corporation (now AECOM), the Licensed Site Professional (LSP)-of-Record for this Site, submitted a letter to MassDEP on your behalf in which she invoked the rebuttal provision in 310 CMR 40.0414(2) with respect to the presumption that an IRA shall require the initiation of one or more containment and/or removal actions. In the October 1, 2014 letter, AECOM requested an opportunity to discuss the scope and schedule of the anticipated IRA Plan Modification required by MassDEP. In response to AECOM’s

request, MassDEP verbally communicated the suspension of the Interim Deadline established in the September 12, 2014 letter and subsequently sent an email to you on November 6, 2014 in which MassDEP indicated that a new deadline for the IRA Plan Modification would be established in future correspondence.

MassDEP subsequently met with you, representatives of AECOM, the City of New Bedford and the U.S. Environmental Protection Agency (EPA) on October 16 and December 10, 2014 to discuss the recent work conducted by you and AECOM at the former Aerovox property, and the work being conducted by EPA in the Acushnet River under the New Bedford Harbor Superfund Program. At this meeting EPA indicated that they are scheduled to initiate dredging of contaminated sediments from the Acushnet River immediately adjacent to the Aerovox Site's sheet pile cutoff wall in 2016. Concern was expressed by EPA and MassDEP about the potential for re-contaminating the sediments in the Acushnet River if the dense non-aqueous phased liquid (DNAPL) detected in wells located west of the sheet pile cutoff wall is not effectively contained on the Aerovox Site. As you are aware, the sheet pile cutoff wall is part of the Site and was designed "to serve as a vertical barrier between PCB-contaminated soils and groundwater, and tidal flow into and out of the Acushnet River." See Paragraph 6(k) of the June 3, 2010 Administrative Consent Order (ACO-SE-09-3P-016) (the 2010 ACO).

During and subsequent to the October and December 2014 meetings, AECOM has indicated that additional data are necessary to appropriately delineate the extent of DNAPL in the overburden along the waterfront; to identify bedrock fractures where DNAPL may pool; to assess the extent of DNAPL in the bedrock aquifer; and to evaluate the potential mobility of DNAPL at the Aerovox Site.

Since these meetings, MassDEP has conferred internally (with both Lakeville and Boston staff) and with the EPA and the U.S. Army Corps of Engineers (ACOE) relative to the past, current and potential future DNAPL migration to the Acushnet River, particularly considering the dredging proposed to be conducted by the EPA. Based on a review of available literature regarding DNAPL research and reported case studies from remedial investigations and completed remedial actions at an increasing number of sites suggests the understanding of DNAPL behavior in the subsurface continues to evolve. MassDEP is therefore of the opinion that the Immediate Response Action at the Aerovox Site should proceed based on the technical guidance and procedures outlined in two recent and widely accepted references:

- Assessment and Delineation of DNAPL Source Zones at Hazardous Waste Sites. B.H. Kueper and K.L. Davies. 2009. EPA/600/R-09/119.
- Integrated DNAPL Site Strategy Technical/Regulatory Guidance. Interstate Technology Regulatory Council. 2011. IDSS-1.

The Kueper and Davies guidance summarizes the lines of evidence used to identify or infer the presence of DNAPL and its potential mobility. These lines of evidence include site use and history, soil and groundwater concentrations, and ultimately visual observations, with the following note on uncertainty:

"Given the selective nature of DNAPL migration, it is not feasible to determine the exact location and extent of individual DNAPL migration pathways within the overall confines of the source zone in either unconsolidated deposits, or fractured bedrock. Because data collection efforts typically involve a finite number of local-scale measurements taken at discrete locations (e.g., water quality samples, soil samples, etc.), some uncertainty will exist regarding the delineated spatial extent of the source zone."

"To address the issue of uncertainty, it is recommended that both a 'Confirmed/Probable' DNAPL source zone be delineated, as well as a 'Potential' DNAPL source zone. The Confirmed/Probable source zone is the volume within which compelling and multiple lines of evidence indicate that DNAPL is present....The Potential source zone is of larger spatial extent, and is defined as that volume of the subsurface within which

some lines of evidence indicate that DNAPL may be present, but the lines of evidence are not as numerous, consistent, or compelling as within the Confirmed/Probable source zone."

Based upon existing Site information, virtually all of the former Aerovox building footprint and adjacent areas to the north and east of the former building, as well as a portion of what was the adjacent parking area, would be considered as a "Potential Source Zone" as defined above. In addition, the following three areas described below would be considered and described as "Confirmed/Probable" source zones:

1. The northwest corner of the building footprint beneath what was the oil storage, impregnation, and pump room where total PCBs at concentrations in the percent levels were identified in soil samples from beneath the slab of the building in the 1998 investigation, and elevated soil concentrations remain as identified in the recent Comprehensive Site Assessment investigations by AECOM;
2. The historically unpaved area adjacent to the Acushnet River from the central to the southeastern corner of the property where total PCBs at concentrations in the percent levels were identified in shallow soil samples collected as part of the initial 1980s investigations as well as in the recent Comprehensive Site Assessment investigations by AECOM; and
3. The entire northeast corner of the Site where total PCBs at concentrations in the percent levels were identified in soil samples collected as part of the initial Site investigations triggering the installation of the cap and sheet pile wall in 1984 and where total PCBs at concentrations in the percent levels were identified in shallow soil samples and where measurable amounts of DNAPL have been observed in two deeper monitoring wells in the ongoing Comprehensive Site Assessment investigations by AECOM.

In light of the fact that source zones have been sufficiently identified and defined for the Aerovox Site, MassDEP believes that the primary objective should be to implement effective and adaptive treatments that may need to integrate more than one remedy to address complex contamination scenarios. This approach is presented in greater detail in the 2011 ITRC Guidance document referenced above.

As stated above, the evidence presented thus far indicates that migration of DNAPL across the Site boundary, particularly in the northeast portion of the Site, is likely to be occurring and has the potential to increase in response to the EPA dredging scheduled for 2016, which supports the need to consider containment at this time. AECOM, on behalf of AVX, has invoked the rebuttal provisions of 310 CMR 40.0414(2), and has expressed its intent to collect and provide additional data to support its assertion regarding the migration of DNAPL, both currently and at the time of the EPA dredging activities. MassDEP hereby requests that all lines of evidence and all other information that AVX intends to rely on to support the rebuttal hypothesis asserted by AECOM be submitted to MassDEP for review, as outlined below.

REQUEST FOR IRA STATUS REPORT

Pursuant to 310 CMR 40.0414(1), an IRA shall be adequate and sufficient for determining whether remedial actions are required at the Site prior to the completion of a Phase IV Remedy Implementation Plan as described in 310 CMR 40.0870. This requirement is not subject to rebuttal. If DNAPL is currently migrating through, under and/or around the sheet pile wall and into the Acushnet River, or is likely to migrate into the Acushnet River in response to EPA dredging of the sediments (which is scheduled to occur prior to the current deadline for the completion of Comprehensive Response Actions at the Site), then the unmitigated migration of DNAPL at present and for the time period that is likely to be required for the implementation of completion of Comprehensive Response Actions would substantially increase the extent, area or magnitude of environmental

contamination; and/or, substantially increase the degree and complexity of future remedial actions; and/or, substantially increase the cleanup costs. If this is the case, AECOM's rebuttal to the presumption for removal or containment allowed pursuant to 310 CMR 40.0414(2) presented in the October 1, 2014 letter from AECOM would not be valid. To date, MassDEP has not received sufficient data to support AECOM's rebuttal by a preponderance of the evidence, which is required by 310 CMR 40.0414 (2). In order to determine whether the rebuttal presented in the October 1, 2014 letter from AECOM is valid, MassDEP is requesting that you submit an IRA Status Report which addresses the following considerations:

1. Lines of evidence that demonstrate the DNAPL is not currently migrating and is not likely to migrate in response to the dredging the EPA is scheduled to conduct in 2016, should be presented, supported, and fully evaluated.
2. The August 15, 2013 Phase II Scope of work submitted on your behalf reiterated that the existing sheet pile cutoff wall was installed to prevent the migration of contaminants into the Acushnet River. Therefore, the data provided in the requested IRA Status Report should also include an evaluation of the effectiveness of the existing sheet pile wall in serving its purpose.
3. In its October 1, 2014 letter and subsequent discussions, AECOM indicated that additional data have been collected to define DNAPL migration pathways and the potential for DNAPL migration, specifically, pump tests, slug tests, tidal studies bedrock analysis, interfacial tension, and DNAPL viscosity. In addition, in a letter attached to an email submitted to MassDEP on February 27, 2015, AECOM indicated that additional assessment activities, including Ultra-Violet Optical Screening, a resistivity survey and misse-a-la-masse survey, were to be conducted to further assess the potential for DNAPL migration. All these data, and any additional information or data collected but not formally submitted to date, should be included in the IRA Status Report, along with an analysis of AECOM's findings that are based upon the data and/or other information.

The evaluation presented in the IRA Status Report should consider all applicable relevant up-to-date methods, standards, and practices, including the November 2011 Integrated DNAPL Site Strategy approach prepared by the Interstate Technology and Regulatory Council (ITRC 2011) and Assessment and Delineation of DNAPL Source Zones at Hazardous Waste Sites (Kueper and Davies 2009).

MassDEP hereby requests that the IRA Status Report be submitted to MassDEP by **June 15, 2015**. This date constitutes an enforceable Interim Deadline pursuant to 310 CMR 40.0167. Failure to comply with an Interim Deadline may result in enforcement actions by the MassDEP, including, but not limited to, the issuance of a Notice of Noncompliance, an Administrative Penalty, and/or Enforcement Orders, or, referral to the Massachusetts Attorney General's Office.

On the basis of the lines of evidence, and support therefore, that are submitted in the IRA Status Report, MassDEP will make its determination whether the data collected sufficiently supports the rebuttal to the presumption for containment and/or removal actions pursuant to 310 CMR 40.0414(2) and AECOM's assertion that the DNAPL is not migrating and is not likely to migrate in response to the EPA dredging program.

PHASE II DEADLINE EXTENSION

On February 10, 2015 AECOM, on behalf of AVX, submitted a Request for Extension letter to MassDEP seeking additional time to complete the Phase II Comprehensive Site Assessment Report. Based upon the information provided in the letter and subsequent discussions with AECOM, MassDEP has determined that the Request for Extension was adequately supported and, therefore, will grant the extension as provided in the attached

amendment to the 2010 ACO. Please sign both originals of the amendment and return both signed originals to MassDEP for execution by **June 1, 2015**. Upon execution, MassDEP will return one of the signed originals to you for your records.

If you have any questions regarding this matter, please contact Gerard Martin, at the letterhead address or by telephone at (508) 946-2799. All future communications regarding this matter must reference Release Tracking Number 4-0000601.

Sincerely,

A handwritten signature in black ink that reads "Millie Garcia-Serrano". The signature is fluid and cursive, with a large loop at the beginning.

Millie Garcia-Serrano, MPH
Deputy Regional Director
Bureau of Waste Site Cleanup

MGS/GM/lg

CERTIFIED MAIL # 7013 1090 0000 9295 1979
RETURN RECEIPT REQUESTED

ec: City of New Bedford Mayor

New Bedford Office of Environmental Stewardship

New Bedford Health Department

Marilyn M. Wade, P.E., LSP
AECOM

U.S. EPA
Attn: Ginny Lombardo, Team Leader, New Bedford Harbor Superfund Site

DEP-SERO
Attn: Gerard Martin, Chief, Brownfields, C&E and Risk Reduction Section
Attn: Dawn Stolfi Stalenoef, Chief Regional Counsel
Attn: Lara Goodine, BWSC – Data

DEP-Boston
Attn: Paul Locke
Attn: Paul Craffey
Attn: Joe Coyne

**COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

AVX Corporation)
801 17th Avenue)
Box 867)
Myrtle Beach, SC 29578)

File No.: ACO-SE-09-3P-016 – AMEND#1

AMENDMENT OF ADMINISTRATIVE CONSENT ORDER

The Department of Environmental Protection (“Department” or “MassDEP”) and the Respondent agree to amend and incorporate the following changes into the Administrative Consent Order ACO-SE-09-3P-016:

1. *Section III, paragraph 12, that originally stated:*

12. Respondent shall perform the following actions:

- (b). Within 545 days of Respondent’s receipt of MassDEP’s written approval of the Phase II SOW, Respondent shall submit to MassDEP a Phase II Comprehensive Site Assessment (“Phase II CSA”) for the Site, prepared in accordance with 310 CMR 40.0830.
- (c). Within 180 days of Respondent’s receipt of MassDEP’s written approval of a Phase II CSA which indicates that additional Comprehensive Response Actions are necessary to achieve a Response Action Outcome (“RAO”) at the Site, Respondent shall submit to MassDEP a Phase III Remedial Action Plan (“Phase III RAP”), prepared in full accordance with 310 CMR 40.0850.
- (d). Within 365 days of Respondent’s receipt of MassDEP’s written approval of the Phase III RAP, Respondent shall submit to MassDEP a Phase IV Remedy Implementation Plan (“Phase IV RIP”), prepared in accordance with 310 CMR 40.0870.
- (e). Within 730 days of Respondent’s receipt of MassDEP’s written approval of the Phase IV RIP, Respondent shall submit to MassDEP a Phase IV Final Inspection Report and a Phase IV Completion Statement (“Phase IV Completion”), prepared in accordance with 310 CMR 40.0878 and 40.0879, respectively. Concurrent with submittal of the Phase IV Completion, Respondent shall submit a Remedy Operation Status (“ROS”) Submittal, in accordance with 310 CMR 40.0893, or Respondent shall submit a Class A RAO Statement to MassDEP, prepared in accordance with 310 CMR 40.1056.

- (f). If, at any time after Respondent submits the Phase II CSA, in accordance with Paragraph 12(c), and the MassDEP issues written approval of the Phase II CSA, Respondent submits a Class A RAO Statement, in accordance with 310 CMR 40.1000, Respondent need not continue with Comprehensive Response Actions at the Site pursuant to 310 CMR 40.0550(3) or 310 CMR 40.0560(3), whichever is applicable.

is hereby amended to:

12. Respondent shall perform the following actions:

- (b). By **September 20, 2015**, Respondent shall submit to MassDEP a Phase II Comprehensive Site Assessment ("Phase II CSA") for the Site, prepared in accordance with 310 CMR 40.0830.
- (c). Within 90 days of Respondent's receipt of MassDEP's written approval of a Phase II CSA which indicates that additional Comprehensive Response Actions are necessary to achieve a Permanent Solution Statement (formerly referred to as a Class A Response Action Outcome ("RAO") Statement) at the Site, Respondent shall submit to MassDEP a Phase III Remedial Action Plan ("Phase III RAP"), prepared in full accordance with 310 CMR 40.0850.
- (d). Within 305 days of Respondent's receipt of MassDEP's written approval of the Phase III RAP, Respondent shall submit to MassDEP a Phase IV Remedy Implementation Plan ("Phase IV RIP"), prepared in accordance with 310 CMR 40.0870.
- (e). Within 700 days of Respondent's receipt of MassDEP's written approval of the Phase IV RIP, Respondent shall submit to MassDEP a Phase IV Final Inspection Report and a Phase IV Completion Statement ("Phase IV Completion"), prepared in accordance with 310 CMR 40.0878 and 40.0879, respectively. Concurrent with submittal of the Phase IV Completion, Respondent shall submit a Remedy Operation Status ("ROS") Submittal, in accordance with 310 CMR 40.0893, or Respondent shall submit a Permanent Solution Statement (formerly a Class A RAO Statement) to MassDEP, prepared in accordance with 310 CMR 40.1056.
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2. The undersigned certify that they are fully authorized to enter into the terms and conditions of this Consent Order and to legally bind the party on whose behalf they are signing this Consent Order.
3. This Consent Order Amendment shall become effective on the date that it is executed by MassDEP.

4. The Department represents that the Regional Director has the authority to issue this Order on behalf of the Department.
5. The remaining provisions of this Order, specifically Section III, which addresses the terms and conditions for imposing stipulated penalties, are still in force.

Consented To:

By: _____

Kurt P. Cummings
Vice President, Chief Financial Officer, Treasurer & Secretary
801 17th Avenue
Box 867
Myrtle Beach, South Carolina 29578-0687

Federal Employer Identification Number: 33-0379007

Date: _____

Issued By:

DEPARTMENT OF ENVIRONMENTAL PROTECTION

By: _____

Philip Weinberg
Regional Director
Department of Environmental Protection
20 Riverside Drive
Lakeville, Massachusetts 02347

Date: _____

**COMMONWEALTH OF MASSACHUSETTS
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- (d). Within 365 days of Respondent’s receipt of MassDEP’s written approval of the Phase III RAP, Respondent shall submit to MassDEP a Phase IV Remedy Implementation Plan (“Phase IV RIP”), prepared in accordance with 310 CMR 40.0870.
- (e). Within 730 days of Respondent’s receipt of MassDEP’s written approval of the Phase IV RIP, Respondent shall submit to MassDEP a Phase IV Final Inspection Report and a Phase IV Completion Statement (“Phase IV Completion”), prepared in accordance with 310 CMR 40.0878 and 40.0879, respectively. Concurrent with submittal of the Phase IV Completion, Respondent shall submit a Remedy Operation Status (“ROS”) Submittal, in accordance with 310 CMR 40.0893, or Respondent shall submit a Class A RAO Statement to MassDEP, prepared in accordance with 310 CMR 40.1056.

- (f). If, at any time after Respondent submits the Phase II CSA, in accordance with Paragraph 12(c), and the MassDEP issues written approval of the Phase II CSA, Respondent submits a Class A RAO Statement, in accordance with 310 CMR 40.1000, Respondent need not continue with Comprehensive Response Actions at the Site pursuant to 310 CMR 40.0550(3) or 310 CMR 40.0560(3), whichever is applicable.

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