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# TOWN OF MEDFIELD

***Office of the Select Board***

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**DRAFT**

November 14, 2025

By Email
James McQuade
Massachusetts Department of Environmental Protection
Solid Waste Management Program
8 New Bond Street
Worcester, Massachusetts 01606

**Re: Closure and Beneficial Solar Reuse of former Medfield Municipal Landfill**

Dear Mr. McQuade:

I write to request a meeting with you and your team regarding the formal closure and beneficial reuse of the Town of Medfield's 65 North Meadow Road former landfill (the "Site"). This letter describes the current conditions of the Site, and requests a meeting to discuss possible beneficial reuse of the Site to install a solar facility, consistent with MassDEP's policies encouraging the development of renewable energy on closed landfills.[1]

The Town formerly operated a 13-acre landfill (the "Former Landfill") at the Site from the late 1890s until 1993. Figures showing the Former Landfill, its features, and surrounding resources, are attached as Exhibit A. The landfill received municipal solid waste. In the 1990s, the Town began the process of officially closing the landfill. It filed a Corrective Action Alternative Analysis, Corrective Action Design, and a Comprehensive Site Assessment ("CSA") with MassDEP's Northeast Region in 1995. Although the landfill closure was not formally completed under 310 CMR 19.140, the Town, in partnership with Apex Companies (formerly Environmental Partners Group) has performed quarterly landfill gas monitoring and semi-annual water quality monitoring at the Site. Per a September 29, 2000 letter from MassDEP, Apex has submitted those monitoring results to the agency since 2003, and to our knowledge MassDEP

[1] MassDEP's Fact Sheet on this topic is available at https://www.mass.gov/doc/fact-sheet-developing-renewable-energy-facilities-on-closed-landfills/download.

staff has never raised an issue with sampling results. A summary of groundwater and surface water sampling results is attached as Exhibit B.

The Former Landfill is divided into two areas that are capped with slightly different material. The larger section to the north, comprised of approximately 4.5 acres and shown in red in Exhibit A at Figure 2, is covered by a geomembrane cap. The plans the Town initially submitted to MassDEP for this 30" cap included a 40-ml HDPE membrane barrier sandwiched between 6" of intermediate cover on top of the solid waste, a venting layer of 6" of sand gas on the bottom, and 6" of drainage sand, and 12" of vegetative support material in the form of sand/loam on top. A smaller area to the east, shown in blue in Exhibit A at Figure 2, was proposed to be capped with 18" of low permeability soil barrier layer, with the same 6" intermediate cover and 6" sand gas venting layer below it, and the same 6" drainage sand and 12" vegetative support cover on top of it.

It is the Town's understanding that their prior consultants at GZA GeoEnvironmental, Inc. complied with all measures expected of a post-closure landfill, including in 1998, filing a "written construction documentation report" containing as-built drawings of the membrane, and documenting the final landfill grades based on field surveys. Apex has continued conducting quarterly reviews of the Site since 2003. Apex, through a registered third-party inspector in accordance with 310 CMR 19.018(5), has also performed biennial landfill inspections, most recently in June 2024. The June 2024 landfill inspection found the landfill vegetative cover and the stormwater management controls to be well maintained and in excellent condition.

The Town seeks to formally close both sections of the Former Landfill pursuant to MassDEP's regulations at 310 CMR 19.140. We believe that the geomembrane-capped portion of the Site is well-suited for solar use, and accordingly the Town would like to pursue the formal closure of at least that portion of the Former Landfill as soon as possible. The closure of the smaller portion of the Former Landfill could proceed in tandem with the other geomembrane cap closure, but this portion of the Site likely is less suitable for solar. If possible, the Town would like to pursue closure activities concurrently with development of post-closure renewables. MassDEP has noted that in some cases, former landfill "closure activities can be conducted concurrently with the development of the post-closure use."[2] Where federal tax credit requirements and the Commonwealth's renewables programs pose unique and time-sensitive opportunities to develop solar facilities, the Town seeks to maximize beneficial reuse of the Site as soon as possible.

We understand that MassDEP may have factual questions or request environmental assessments to better understand conditions at the Former Landfill, to supplement the 22 years of data that Apex has collected. We would like to schedule a time with your team at your convenience to discuss the Site and the path forward to beneficial reuse. I look forward to hearing from you.

[2] MassDEP, Landfill Post-Closure Use Permitting Guidelines, June 2009, at 1, available at https://www.mass.gov/doc/landfill-post-closure-use-permitting-guidelines/download.

Very truly yours,

Kristine Trierweiler
Town Administrator

cc: Medfield Select Board; Medfield DPW

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