COMMONWEALTH OF MASSACHUSETTS
TOWN OF HUDSON
BOARD OF HEALTH

B-P Trucking, Inc., and Town of Hudson Department of Public Works,	Request for Minor Modification to Site Assignment 1 Municipal Drive a/k/a 300 Cox Street Hudson, MA

PRE-FILED DIRECT TESTIMONY OF A.J. JABLONOWSKI, P.E.

I, A.J. Jablonowski, under oath and subject to the penalties of perjury, do testify as follows:

QUALIFICATIONS

1. I have a Bachelor's Degree in Chemical Engineering from Johns Hopkins University and am presently a Principal at Epsilon Associates, Inc. ("Epsilon"), an environmental engineering and consulting firm with an office in Maynard, Massachusetts.

2. I have over 35 years of engineering experience focused on environmental licensing, permitting, compliance, air permit applications and enforcement, pollution control studies, and regulatory applicability studies. I have provided consulting expertise to a variety of industries including solid waste handling, power production, surface coating, metalworking, electronics, food processing, and groundwater treatment. I hold professional engineering registrations in Massachusetts and New Jersey. I have extensive knowledge of air pollution regulations. I have aided clients in issues related to air permitting and compliance focused on air emissions and potential nuisance conditions, including sound and odor issues. A summary of my education and experience is attached hereto as **Exhibit A**.

SCOPE OF ENGAGEMENT AND TESTIMONY

3. Epsilon was retained by Sanborn Head & Associates, Inc. ("SHA"), on behalf of B-P Trucking, Inc. ("B-P"), to conduct sound and odor studies in connection with the Town of Hudson Department of Public Works ("Hudson DPW") and B-P's request for a minor modification to site assignment for the property at 1 Municipal Drive a/k/a 300 Cox Street in Hudson (the "Site"). The purpose of Epsilon's sound and odor studies was to determine whether the proposed minor modification has the potential for the creation of danger to public health, safety or the environment.

4. Epsilon was previously retained by SHA, on behalf of B-P, to prepare draft and final environmental impact reports in connection with proceedings under the Massachusetts Environmental Policy Act, G.L. c. 30, §§ 61-62L ("MEPA"), which analyzed the proposed project's potential air quality impacts, among other issues.

PROJECT INFORMATION

5. B-P and the Hudson DPW propose a minor modification of the existing site assignment for the Site. The Hudson Board of Health issued a site assignment for a refuse transfer station at the Site in January 1986. The Site is an approximately 72-acre parcel which currently includes the existing solid waste transfer station as well as other municipal facilities, such as the Hudson Fire Department, Hudson Wastewater Treatment Facility, and the combined Hudson Police Department and Public Works Facility. The existing transfer station was constructed in 1988 and began operating in 1996. Since 1999, the transfer station has been operated by B-P. The Hudson DPW is the owner of the Site. B-P plans to relocate the existing transfer station operation further into the interior of the Site within a new transfer station building that it plans to construct.

6. The 1986 site assignment did not stipulate a capacity or total volume limit for solid waste received at the transfer station; however, B-P's operating permit includes a daily tonnage limit of 350 tons per day. The proposed minor modification would set a limit of 850 tons per day of solid waste that B-P could accept at the new transfer station building that B-P proposes to construct in another location on the Site.

7. The location of the proposed transfer station building will be near the southeastern corner of the Site. The new building will be located approximately 1,800 feet from Cox Street (the existing transfer station is approximately 350 feet from Cox Street). The abutting Joseph L. Mulready Elementary School will be located approximately 1,200 feet from the proposed transfer station building (the existing transfer station is approximately 350 feet from the school). The nearest residences to the proposed transfer station building will be approximately 1,500 feet to the southeast along Wilkins Street (Route 62), approximately 1,760 feet west along Cox Street, and approximately 1,900 feet northwest on Elaine Circle (the existing transfer station is approximately 275 feet from the nearest residences on Cox Street).

MATERIALS SUPPORTING OPINION

8. Epsilon prepared a Draft Environmental Impact Report ("DEIR") and a Final Environmental Impact Report ("FEIR") in support of B-P's MEPA submissions. The DEIR, dated April 1, 2024, addressed air quality impacts from the proposed project, among other issues. Administrative Record ("AR"), Ex. 6. The FEIR, dated October 15, 2024, included a more detailed analysis of respiratory conditions within environmental justice communities along truck routes, as required by the Secretary in the DEIR Certificate. AR Ex. 7.

9. Epsilon prepared an Odor Analysis Report identifying industry guidelines and other standards regulating odor emissions and describing best management practices that B-P will take to avoid and minimize off-site odors associated with the operation of the proposed facility. A copy of this report is in Exhibit C to the Request for Minor Modification.

10. Epsilon also conducted an existing ambient sound level monitoring program to characterize existing sound levels near the existing transfer station and the proposed relocated facility

to inform, a future conditions sound level analysis to predict operational sound levels from the proposed facility. The results of these studies are documented in a Sound Level Study dated September 22, 2025, a copy of which is in Exhibit D to the Request for Minor Modification. I collaborated with my Epsilon colleague Laurie Morrill for the preparation of the Sound Level Study.

OPINIONS REGARDING MINOR MODIFICATION

11. This testimony specifically addresses potential air quality impacts, including impacts from vehicle emissions, and potential noise and odor nuisance conditions anticipated to be implicated by the increase in daily tonnage limit proposed in the Request for Minor Modification.

Potential Air Quality Impacts (including vehicle emissions)

12. In connection with the project's MEPA proceedings, Epsilon reviewed potential air quality impacts within the context of the overall regional air quality to assess whether any additional project-related emissions would significantly contribute to the air quality at the Site and cause air pollutant concentrations to exceed available health-based air quality standards. There are no significant stationary sources of air emissions proposed for the facility. The anticipated air quality impacts from the proposed project would be related to an increase in vehicle traffic (specifically diesel truck traffic) associated with the increased daily tonnage limit at the proposed transfer station as well as non-road vehicles handling material within the facility. The concentration of emissions from each of these sources will be limited by relevant United States Environmental Protection Agency ("USEPA") on-road and non-road vehicle emissions standards.

13. The primary air pollutants of concern from diesel trucks are particulates ($PM_{2.5}$) and nitrogen oxides (NO_x). In the DEIR, Epsilon evaluated estimated $PM_{2.5}$ and NO_x from on-road vehicles (including diesel trucks) and estimated $PM_{2.5}$ and NO_2 concentrations at the nearest air monitoring site. Epsilon selected $PM_{2.5}$ because it is a greater health hazard due to its smaller size, and NO_2 because it is used as a health indicator for the larger group of NO_x.

14. Epsilon also reviewed emissions data from the USEPA to obtain an overall understanding of current emissions patterns and trends. Massachusetts air emissions from vehicle traffic have fallen dramatically in recent years, with reductions in excess of 80 percent, largely due to federal vehicle emissions standards for medium- and heavy-duty trucks ("MHD"). Modern MHD vehicles meet emission standards through engine design and aftertreatment technologies.

15. Epsilon obtained background air pollutant concentration data and trends in air pollutant concentrations from monitoring stations across Massachusetts. The closest monitoring station to the Site is located in Worcester, approximately 16 miles southwest. Epsilon compared these data and trends with the USEPA National Ambient Air Quality Standards ("NAAQS"), which are health-based standards below which health impacts are not expected. These standards are used to determine if there are adverse impacts from

emissions sources. Massachusetts Ambient Air Quality Standards ("MAAQS") are identical to the NAAQS.

16. The NAAQS specify concentration levels for various averaging times and include both "primary" and "secondary" standards. Primary standards are intended to protect human health, whereas secondary standards are intended to protect public welfare from any known or anticipated adverse effects associated with the presence of air pollutants, such as damage to vegetation.

17. The NAAQS also reflect various durations of exposure. The short-term averaging (24 hours or less) refer to exposure levels not to be exceeded more than once a year. Long-term periods refer to limits that cannot be exceeded for exposure averaged over three months or longer.

18. Epsilon estimated background air pollutant concentrations representative of the Site area using air quality monitoring data from the nearest monitoring station collected between 2020 and 2022, the most recent available data. USEPA reports air pollution concentrations for defining the NAAQS. These are called design values.

19. For $PM_{2.5}$, Epsilon observed 24-hour background concentrations of 18 $\mu g/m^3$ (below the 35 $\mu g/m^3$ NAAQS) and annual background concentrations of 5.9 $\mu g/m^3$ (below the 9 $\mu g/m^3$ NAAQS).

20. For NO_2, Epsilon observed 1-hour background concentrations of 86.5 $\mu g/m^3$ (below the 188 $\mu g/m^3$ NAAQS) and annual background concentrations of 18.8 $\mu g/m^3$ (below the 100 $\mu g/m^3$ NAAQS).

21. Epsilon concluded that air quality in the vicinity of the Site is generally good, with all local background concentrations well below the NAAQS, and that air quality trends are going down largely due to more stringent vehicle emissions standards and improved vehicle performance. The Commonwealth of Massachusetts is in "attainment" because all locations are meeting the NAAQS.

22. Epsilon also performed a mesoscale analysis of air emissions (a model for predicting the change in regional ozone precursor emissions) for existing, no-build, and build conditions. Based on this analysis, Epsilon expects an overall decrease in emissions of volatile organic compounds ("VOCs"), NO_x, $PM_{2.5}$, and diesel particulate matter ("DPM") (a subset of $PM_{2.5}$) between the 2024 existing condition and the 2031 no-build scenario, and a very small increase in emissions of these pollutants between the 2031 no-build and 2031 build scenarios. These increases are 3.5 percent or less, and less than 0.05 tons per year.

23. Epsilon also performed an air modeling dispersion analysis using the USEPA AERMOD model to assess air quality impacts at the worst-case intersections (i.e., those with the most traffic during the peak hours of the day) located in the designated geographic area of environmental justice ("EJ") communities located in the vicinity of the Site (i.e., within five miles). These data were used to estimate the impact of the project on air quality near EJ communities. Epsilon concluded that the expected air pollutant concentrations would

be less than 0.5 $\mu g/m^3$ for $PM_{2.5}$ and less than 1 $\mu g/m^3$ for NO_2, which, added to background concentrations, would result in total future concentrations well below the NAAQS.

24. Further, the proposed facility will be located approximately 1,400 feet further into the Site than the existing transfer station facility, increasing the distance to homes and other sensitive receptors, which improves the dispersion of emissions.

25. In the DEIR MEPA certificate, the Secretary requested that B-P perform a more detailed analysis of respiratory conditions within EJ communities along expected truck routes. In the FEIR, Epsilon evaluated asthma prevalence in PK-12 schools near EJ communities and the Site and found that asthma rates are slightly higher than the state rate for all schools except the Mulready Elementary School, which is the closest school to the Site. Epsilon concluded that these data do not suggest that asthma prevalence is of particular concern in these areas given that air quality in the area is good and below the NAAQS, which are health-based standards that are set to protect the most vulnerable population groups, including asthmatic children, and that asthma is a multi-factorial disease with multiple triggers and risk factors beyond just ambient air pollution. AR Ex. 7.

26. Further, in the FEIR, Epsilon analyzed the USEPA EJ Screen tool to assess vulnerability of the EJ communities for documented environmental and socioeconomic indicators. Epsilon concluded that none of the air pollutants of concern, including $PM_{2.5}$, DPM, and ozone, were elevated compared to state levels, which was consistent with Epsilon's analysis in the DEIR. AR Ex. 7.

27. In the FEIR, Epsilon also discussed how B-P will work with contractors to implement best management practices to mitigate air quality impacts resulting from construction activities. These best management practices will include encouraging contractors to use USEPA Tier 4 construction equipment or equipment retrofitted with diesel emission control devices to the greatest extent practicable; using ultra-low sulfur diesel for all trucks and construction machinery; maintaining an idle-free work area; and minimizing exposed storage of debris on-site through measures such as wetting soils and covering stockpiles.

28. B-P also committed to mitigating air quality impacts by donating $50,000 ($10,000 annually for the first five years of operations) to the Town of Hudson for tree planting associated with town projects.

29. In both the DEIR and FEIR, Epsilon concluded that, based on the results of its air quality analyses, the project-related traffic would result in only minor contributions to overall air pollution levels and will not contribute to any exceedance of the NAAQS, and thus would not result in any disproportionate adverse effect on EJ populations in the project area.

30. Accordingly, based on the air quality analysis performed in connection with the DEIR and FEIR, it is my professional opinion that the Site as modified by the proposed minor modification will not exceed required state and federal air quality standards or otherwise constitute a danger to the public health, safety, or the environment.

Potential for Creation of Nuisances

Noise

31. Epsilon's Sound Level Study presents the findings of computer modeling that uses measurements of sound from the existing transfer station to predict future sound levels at the proposed transfer station when operational. The project components were modeled in CadnaA.

32. Sound levels are measured using the logarithmic decibel (dB) scale. Scientific research demonstrates that several general principles apply between sound level and human perception of sound for two sound levels with the same or very similar frequencies: (1) a 3 dB increase or decrease results in a change in sound that is just perceptible to the average person; (2) a 5 dB increase or decrease is described as a clearly noticeable change in sound level; and (3) a 10 dB increase or decrease is described as twice or half as loud. Further, a mathematical property of decibels is that if one sound is at least 10 dB louder than another, the total sound is simply the sound level of the higher-level source.

33. Two metrics are commonly used for describing variable sounds: exceedance levels (L_n) and the equivalent level (L_{eq}). Exceedance levels are values from the cumulative amplitude distribution of all the sound levels observed during a measurement period. The L_{90} is the sound level exceeded 90 percent of the time during the measurement period. It is close to the lowest sound level observed and is essentially the same as the residual sound level observed when there are no obvious nearby intermittent sound sources. As such, it is often used to establish the "ambient" or "background" sound. The L_{eq} is a period average defined as the level of a hypothetical steady sound that would have the same energy as the actual fluctuating sound observed.

34. Epsilon collected continuous sound measurements between 10:27 a.m. and 12:53 p.m. on Thursday, April 10, 2025, at a location approximately 100 feet from the open waste handling building doors at the existing transfer station. Epsilon also used a second sound level monitor to take shorter duration measurements at locations near the facility perimeter. The measurements were representative of typical sound sources associated with weekday operations. The data were used to construct and calibrate a computer sound model of the existing facility and build a predictive sound model of the proposed transfer station.

35. Sources of sound at the existing facility (which should be the same at the proposed transfer station) are generally intermittent, so sound levels tend to fluctuate throughout the day. To be conservative, Epsilon modeled all sources as operating continuously and simultaneously, though in practice this will be a rare occurrence. Noise-generating activity from front-end loaders and excavators will take place inside the waste handling building and emanate from open roll-up doors. The other sound source will be trucks operating outside the transfer station building.

36. During the measurement period, the 1-second L_{eq} sound levels measured on-site ranged from 54 dBA to 89 dBA L_{eq}. The 15-minute residual L_{90} sound levels ranged from 55 dBA

to 67 dBA. Sound levels measured near the facility perimeter ranged from 48 dBA to 70 dBA.

37. The predicted sound levels at modeling locations range from 45 dBA to 50 dBA with the roll-up doors open and interior equipment running. The highest predicted project-only L_{eq} sound level at any modeling location is the school at 50 dBA. The highest predicted project-only L_{eq} sound level at a residence is 47 dBA, which is consistent with sound levels at a small-town residential area, and does not present a danger to public health, safety, or the environment.

38. Where feasible, B-P has implemented noise reduction strategies based on Epsilon's sound modeling. The implemented strategies include relocation of the transfer station building to a more distant location on the Site; changes to operational practices through the implementation of best management practices; and establishing operating hours that decrease activities in the late afternoon in conjunction with activities at nearby town facilities.

39. Epsilon has developed, and B-P will implement, operational best management practices to minimize noise and to identify and respond to noise issues at the facility. These best management practices include conducting all waste handling activities indoors; designing the proposed transfer station to eliminate steep uphill grades for waste-hauling trucks; equipping B-P's collection vehicles and on-site vehicles with "white noise" backup alarms rather than traditional tonal alarms; timing the loudest noise-generating activities at selected hours when adjoining properties are unoccupied or when off-site background noise is highest; communicating noise-restriction truck standards to third parties; minimizing idling of on-site equipment; maintaining all vehicles and equipment; identifying noise-generating activities; establishing a hotline for noise complaints; implementing video monitoring for assessing noise complaints; and facility staff training on noise mitigation measures.

40. Accordingly, it is my professional opinion that the Site as modified by the proposed minor modification will not cause a nuisance noise or sound condition which would constitute a danger to the public health, safety, or the environment.

Odor

41. As described in the Odor Analysis Report, the proposed facility has been developed to avoid causation of nuisance odor conditions by relocating the transfer station operation further from potential odor receptors and orienting the new transfer station building so that prevailing winds will not transfer odors from the facility to potential receptors.

42. Further, B-P will implement operational best management practices to identify, prevent, and mitigate potential odor issues at the facility. These best management practices include establishing a complaint hotline; installation of misting and fogging systems; installation of a facility exhaust ventilation system; restriction of truck operations (idling, engine revving); indoor storage and operation; orienting doors away from prevailing winds; increasing facility distance to possible receptors; designing the tipping floor for easy

cleanup; diverting or removing odorous wastes from the tipping floor as soon as possible; employing a first-in, first-out waste processing policy with a priority exception for odorous loads; regular inspection and cleaning of tipping floor trench drains; use of a street sweeper for regular cleanup of traveled ways; and frequent odor inspections and monitoring of the complaint hotline.

43. Based on my experience with similar solid waste transfer stations, as well as B-P's experience with current implementation at the existing transfer station, these best management practices are effective at preventing and mitigating nuisance odor conditions. I expect that odors generated on-site at the proposed facility will be minimal and will remain within the transfer station building, so as not to become a nuisance to neighbors or nearby receptors.

44. Accordingly, it is my professional opinion that the Site as modified by the proposed minor modification will not cause a nuisance odor condition which would constitute a danger to the public health, safety, or the environment.

Signed under the pains and penalties of perjury this 30th day of January, 2026.

Signed by:
5B594F2729084D1...
A.J. Jablonowski, P.E.

CERTIFICATION PURSUANT TO 310 CMR 16.07

Pursuant to 310 CMR 16.07, I, A.J. Jablonowski, hereby state that I have no legal interest in the proposed site and certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties both civil and criminal for submitting false information including possible fines and imprisonment.

Signed by:
5B594F2729084D1...
A.J. Jablonowski, P.E.
Epsilon Associates Inc.

Dated: January 30, 2026

EXHIBIT A

A.J. Jablonowski, PE

PRINCIPAL, AIR PERMITTING

EDUCATION

B.S., Chemical Engineering, Johns Hopkins University

PROFESSIONAL REGISTRATIONS

Professional Engineer, Massachusetts, #39123, 1996

Professional Engineer, New Jersey, #40593, 1997

PROFESSIONAL ACTIVITIES

Air and Waste Management Association

Northeast Energy and Commerce Association

PROFESSIONAL SUMMARY

Mr. Jablonowski has over 35 years of experience with a variety of industries including power production, surface coating, chemical production, waste treatment, metalworking, electronics, food processing, and groundwater treatment.

His duties include overall environmental licensing, compliance and due diligence audits, air permit applications, pollution control studies, dust and odor studies, accidental release prevention, and regulatory applicability studies. He reviews operations at a wide variety of industrial and power facilities and recommends process changes for regulatory compliance. He uses strong technical engineering skills, and an ability to grasp regulatory nuances, as part of a positive, problem-solving approach. He is experienced with agency negotiations, public presentations, and legal testimony.

By focusing on client responsiveness, he has maintained years-long relationships with plant managers, environmental managers, and environmental counsel. Highlights of Mr. Jablonowski's experience include:

- Air permit applications or air compliance reviews in 25 states.
- Multimedia licensing for over 2,000 megawatts (MW) of operating merchant electric power.
- Environmental due diligence for over 10,000 MW of electric generating capacity.
- Greenhouse gas quantification and energy efficiency analyses for nearly 3.5 million square feet of commercial space.
- Broad experience with environmental programs, including:
    - Air (PSD, NSR, NSPS, NESHAPs, CAIR, CAMR, RGGI, NOx Budget, Acid Rain, ODS/Title VI, RACT, BART, Title V).
    - Noise (monitoring & modeling supervision, BANCT).
    - Spill and release planning (SPCC, state spill plans, RMP, PSM, ICP).
    - Environmental policy (EIS, EIR, conformity, MEPA, EFSB).
    - Greenhouse gas quantification and energy efficiency analyses.
    - Water intake (316b, state & watershed allocation permits).
    - Coastal/wetlands impacts (ACOE, state stream encroachment).
    - Water discharge (NPDES, SWPPP, 316a).
    - Material handling (EPCRA TRI, RCRA, CERCLA).
    - Solid waste (beneficial use determinations, site suitability).

REPRESENTATIVE PROFESSIONAL EXPERIENCE

Parallel Products, New Bedford, Massachusetts. QC review & strategy support for air, noise, odor, GHG technical analyses. Support for public meetings, and negotiation with MEPA and MassDEP.

Palmer Renewable Energy, Palmer, Massachusetts. Prepared solid waste beneficial use determination (BUD) application, assisted responding to comments on air plan application for 38 MW recycled wood-fired power plant. Documented compliance with 112r General Duty Clause for ammonia handling.

Liberty Energy Trust, Charlton Massachusetts. Multimedia licensing for the Northeast Energy Center, a natural gas liquefaction facility with 2 million gallons of LNG storage and 8 MW natural gas-fired mechanical drive. Energy Facilities Siting Board petition, public hearings, EFSB testimony, Environmental Justice expanded public outreach, wetlands NOI, MassDEP air NMCPA, MHC PNF. Supported project design changes to limit impacts below MEPA review thresholds.

PG&E National Energy Group, Scrubgrass Twp, Pennsylvania. Prepared Title V permit application for waste-coal-fired CFB power plant.

Vineyard Wind - Offshore to Barnstable, Massachusetts. Air emissions & air permitting lead for proposed 400-800 MW offshore wind project, which is located in federal waters and will deliver renewable power to an interconnection point in Barnstable, Massachusetts. The project was in direct response to the Commonwealth's call for 1,600 MW of clean, affordable offshore wind energy. Lead for interaction with air quality agency contacts at US EPA and Bureau of Ocean Energy Management. Provided air regulatory compliance strategy and supervision of application for an Outer Continental Shelf Air Permit, associated Notice of Intent under 40 CFR Part 55, and air sections of the Site Assessment Plan, Construction and Operations Plan (COP), Energy Facilities Siting Board (EFSB) Petition, and Draft Environmental Impact Report (DEIR). Expert testimony before the EFSB.

Dominion, Somerset, Massachusetts. Project Manager for multimedia licensing of natural draft cooling towers and spray dryer absorber/fabric filter at Brayton Point Station. Met tight schedule mandated by EPA for application submission to implement closed cycle cooling at the 1,600 MW coal-, oil-, and natural gas-fired power plant. Agencies involved included EPA, U.S. Army Corps of Engineers, FAA, Massachusetts Office of Dam Safety, MassDEP, MEPA, Massachusetts Aeronautics Commission, Massachusetts Historical Commission, and Town of Somerset Conservation Commission. Filings prepared by Epsilon included: air quality dispersion modeling protocol; consolidated MassDEP air plan approval and EPA PSD Air Permit Application; MEPA Environmental Notification Form (with supplemental materials leading to no EIR); Chapter 91 Waterways License Application to MassDEP; Wetlands Protection Act Notice of Intent; Chapter 401 Water Quality Certification; Chapter 10/404 Application for Department of the Army Permit; Groundwater Remedial General Permit Notice of Intent; Dam Safety Jurisdictional Determination Application; Dredge material sampling plan; Wastewater Treatment System modification application; Stormwater Pollution Prevention Plan; FAA and MAC airspace review applications; and Historic Resources Visual Analysis Study. Simultaneously permitted dry scrubber/fabric filter with carbon injection for Unit 3. Follow-up tasks have included MEPA NPC, Chapter 91 licensing, and Wetland NOI for barge delivery of equipment.

Dominion, Somerset, Massachusetts. Project Manager for air quality dispersion modeling to document compliance with NAAQS. Modeling included over 25 cases, with interactive source inputs Epsilon developed from MassDEP file data.

Excel Recycling, Freetown, Massachusetts. Noise compliance and agency negotiation support for metal shredder facility. Performed and supervised diagnostic and compliance noise testing, and led preparation of test protocol, test report, mitigation plan, and best management practices plan. Provided compliance recommendations. Lead role in MassDEP technical presentations and negotiations. Prepared affidavit for Bristol County Superior Court related to Town of Freetown actions.

Globe Manufacturing, Fall River, Massachusetts. Conducted a detailed engineering assessment of activated carbon VOC control system, including recommendations and conceptual designs for physical and operational modifications to improve efficiency and cut costs.

Sanborn Head/ReSource Ware C&D Handling Facility, Ware, MA. Principal-In-Charge for MEPA Notice of Project Change which included air quality, sound, traffic, and environmental justice analyses. Supported the MassDEP and Ware Board of Health site assignment review process, including leading a public information session. The facility manages construction and demolition (C&D) debris, with material receipts by truck and outbound material by rail and obtained approvals to expand its material throughput.

Kettle Cuisine, Lynn, Massachusetts. Supported odor control project for industrial cooking facility. Stack testing oversight, noise testing, air modeling QC, agency interaction, preparation of final modeling report documenting dispersion improvements, and layman's report describing the control project and the improvements for interested government officials and neighbors.

Aries Clean Technologies, Taunton, Massachusetts. Principal-In-Charge for environmental licensing of a novel gasification project to treat wastewater treatment plant biosolids at a facility located at a closed landfill. Documented compliance with MassDEP site suitability criteria. Modeled and evaluated air quality, noise, and odor impacts from facility operation and facility-related traffic. Evaluated the fate of PFAS and potential exposure pathways. Led the MEPA review including preparation of the ENF and DEIR with enhanced public outreach and Environmental Justice impact analyses. Organized outreach and participation for a successful public meeting with 75+ attendees.

COMMONWEALTH OF MASSACHUSETTS
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B-P Trucking, Inc., and Town of Hudson Department of Public Works,	Request for Minor Modification to Site Assignment 1 Municipal Drive a/k/a 300 Cox Street Hudson, MA

PRE-FILED DIRECT TESTIMONY OF LAURIE MORRILL

I, Laurie Morrill, under oath and subject to the penalties of perjury, do testify as follows:

QUALIFICATIONS

1. I have a Bachelor of Arts in Physics from Reed College and a Master of Environmental Studies from the University of Melbourne. I am presently a Lead Scientist in the Acoustics Group at Epsilon Associates, Inc. ("Epsilon"), an environmental engineering and consulting firm with an office in Maynard, Massachusetts. I have professional affiliations with the Institute of Noise Control Engineering (INCE) and the Acoustical Society of America (ASA).

2. I have over 12 years of experience in specialized acoustical analysis for energy projects, including solar and wind farms, battery energy storage systems, biogas facilities, and natural gas and LNG infrastructure, as well as for solid waste facilities in Massachusetts. My work includes evaluating potential community impacts, ensuring compliance with local, state, and federal noise regulations, supporting permitting processes, developing and executing comprehensive sound level measurement programs, constructing complex predictive sound models, and designing mitigation measures to meet regulatory standards and project sound level receptors. A summary of my education and experience is attached hereto as **Exhibit A**.

SCOPE OF ENGAGEMENT AND TESTIMONY

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Environmental Policy Act, G.L. c. 30, §§ 61-62L ("MEPA"), which analyzed the proposed project's potential air quality impacts, among other issues.

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6. The 1986 site assignment did not stipulate a capacity or total volume limit for solid waste received at the transfer station; however, B-P's operating permit includes a daily tonnage limit of 350 tons per day. The proposed minor modification would set a limit of 850 tons per day of solid waste that B-P could accept at the new transfer station building that B-P proposes to construct in another location on the Site.

7. The location of the proposed transfer station building will be near the southeastern corner of the Site. The new building will be located approximately 1,800 feet from Cox Street (the existing transfer station is approximately 350 feet from Cox Street). The abutting Joseph L. Mulready Elementary School will be located approximately 1,200 feet from the proposed transfer station building (the existing transfer station is approximately 350 feet from the school). The nearest residences will be approximately 1,500 feet to the southeast along Wilkins Street (Route 62), approximately 1,760 feet west along Cox Street, and approximately 1,900 feet northwest on Elaine Circle (the existing transfer station is approximately 275 feet from the nearest residences on Cox Street).

MATERIALS SUPPORTING OPINION

8. My colleagues at Epsilon and I conducted a sound level monitoring program to characterize existing sound levels near the existing transfer station and the proposed relocated facility to inform a future conditions sound level analysis to predict operational sound levels from the proposed facility. The results of these studies are documented in a Sound Level Study dated September 22, 2025, a copy of which is in Exhibit D to the Request for Minor Modification.

OPINIONS REGARDING MINOR MODIFICATION

9. This testimony specifically addresses potential noise and sound conditions anticipated to be implicated by the increase in daily tonnage limit proposed in the Request for Minor Modification.

Potential for Creation of Nuisances

Noise

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11. Sound levels are measured using the logarithmic decibel (dB) scale. Scientific research demonstrates that several general principles apply between sound level and human perception of sound for two sound levels with the same or very similar frequencies: (1) a 3 dB increase or decrease results in a change in sound that is just perceptible to the average person; (2) a 5 dB increase or decrease is described as a clearly noticeable change in sound level; and (3) a 10 dB increase or decrease is described as twice or half as loud. Further, a mathematical property of decibels is that if one sound is at least 10 dB louder than another, the total sound is simply the sound level of the higher-level source.

12. Two metrics are commonly used for describing variable sounds: exceedance levels (L_n) and the equivalent level (L_{eq}). Exceedance levels are values from the cumulative amplitude distribution of all the sound levels observed during a measurement period. The L_{90} is the sound level exceeded 90 percent of the time during the measurement period. It is close to the lowest sound level observed and is essentially the same as the residual sound level observed when there are no obvious nearby intermittent sound sources. As such, it is often used to establish the "ambient" or "background" sound. The L_{eq} is a period average defined as the level of a hypothetical steady sound that would have the same energy as the actual fluctuating sound observed.

13. Epsilon collected continuous sound measurements between 10:27 a.m. and 12:53 p.m. on Thursday, April 10, 2025, at a location approximately 100 feet from the open waste handling building doors at the existing transfer station. Epsilon also used a second sound level monitor to take shorter duration measurements at locations near the facility perimeter. The measurements were representative of typical sound sources associated with weekday operations. The data were used to construct and calibrate a computer sound model of the existing facility and build a predictive sound model of the proposed transfer station.

14. Sources of sound at the existing facility (which should be the same at the proposed transfer station) are generally intermittent, so sound levels tend to fluctuate throughout the day. To be conservative, Epsilon modeled all sources as operating continuously and simultaneously, though in practice this will be a rare occurrence. Noise-generating activity from front-end loaders and excavators will take place inside the waste handling building and emanate from open roll-up doors. The other sound source will be trucks operating outside the transfer station building.

15. During the measurement period, the 1-second L_{eq} sound levels measured on-site ranged from 54 dBA to 89 dBA L_{eq}. The 15-minute residual L_{90} sound levels ranged from 55 dBA

to 67 dBA. Sound levels measured near the facility perimeter ranged from 48 dBA to 70 dBA.

16. The predicted sound levels at modeling locations range from 45 dBA to 50 dBA with the roll-up doors open and interior equipment running. The highest predicted project-only L_{eq} sound level at any modeling location is the school at 50 dBA. The highest predicted project-only L_{eq} sound level at a residence is 47 dBA, which is consistent with sound levels at a small-town residential area, and does not present a danger to public health, safety, or the environment.

17. Where feasible, B-P has implemented noise reduction strategies based on Epsilon's sound modeling. The implemented strategies include relocation of the transfer station building to a more distant location on the Site; changes to operational practices through the implementation of best management practices; and establishing operating hours that decrease activities in the late afternoon in conjunction with activities at nearby town facilities.

18. Epsilon has developed, and B-P will implement, operational best management practices to minimize noise and to identify and respond to noise issues at the facility. These best management practices include conducting all waste handling activities indoors; designing the proposed transfer station to eliminate steep uphill grades for waste-hauling trucks; equipping B-P's collection vehicles and on-site vehicles with "white noise" backup alarms rather than traditional tonal alarms; timing the loudest noise-generating activities at selected hours when adjoining properties are unoccupied or when off-site background noise is highest; communicating noise-restriction truck standards to third parties; minimizing idling of on-site equipment; maintaining all vehicles and equipment; identifying noise-generating activities; establishing a hotline for noise complaints; implementing video monitoring for assessing noise complaints; and facility staff training on noise mitigation measures.

19. Accordingly, it is my professional opinion that the Site as modified by the proposed minor modification will not cause a nuisance noise or sound condition which would constitute a danger to the public health, safety, or the environment.

Signed under the pains and penalties of perjury this 30th day of January, 2026.

Signed by:
38E7F277E59E42B...
Laurie Morrill

CERTIFICATION PURSUANT TO 310 CMR 16.07

Pursuant to 310 CMR 16.07, I, Laurie Morrill, hereby state that I have no legal interest in the proposed site and certify under the penalty of law that I have personally examined and am

familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties both civil and criminal for submitting false information including possible fines and imprisonment.

Signed by:

38E7F277E59E42B...

Laurie Morrill
Epsilon Associates Inc.

Dated: January 30, 2026

EXHIBIT A

Laurie Morrill

LEAD SCIENTIST, ACOUSTICS

EDUCATION

Master of Environmental Studies, University of Melbourne

B.A., Physics, Reed College

PROFESSIONAL AFFILIATIONS

Institute of Noise Control Engineering (INCE)

Acoustical Society of America (ASA)

PROFESSIONAL SUMMARY

Laurie Morrill is a Lead Scientist in the Acoustics Group at Epsilon Associates with a background in physics and environmental science. Ms. Morrill specializes in acoustical analysis for energy projects, including solar and wind farms, battery energy storage systems, biogas facilities, and natural gas compressor and meter stations. Ms. Morrill has demonstrated expertise in evaluating potential community impacts, ensuring compliance with local, state, and federal noise regulations, and supporting permitting processes. She is proficient in developing and executing comprehensive sound level measurement programs, constructing complex predictive sound models, and designing mitigation measures to meet regulatory standards and projects sound level targets. Laurie has experience working on a diverse range of project types across multiple states, providing thorough and accurate assessments to support environmental and regulatory requirements.

PROFESSIONAL EXPERIENCE

SOLID WASTE FACILITIES

South Coast Renewables, LLC, New Bedford, MA Performed a sound level assessment including sound monitoring and acoustic modeling for a proposed new solid waste transfer station in New Bedford, MA to assess potential impacts at a nearby residential neighborhood as part of a site assignment process. Worked closely with the MassDEP and third-party reviewer to determine optimal sound mitigation to minimize impacts on the nearby neighborhood.

ReSource C&D Recycling Facility, Ware, MA Performed a sound level assessment including sound monitoring and acoustic modeling for the expansion of an existing solid waste transfer station in Ware, MA. Evaluated sound levels against state and local regulations to support the local permitting process.

Hudson Transfer Station Recycling Center, Hudson, MA Performed a sound level modeling assessment for the proposed expansion of a waste transfer station in Hudson, MA to evaluate adherence to the local Board of Health requirements.

RENEWABLE ENERGY

Tsuga Solar, Saginaw County, MI Performed a sound modeling analysis of a proposed solar project in Saginaw County, MI to evaluate potential impacts from the project on the surrounding community. Attended a township planning board public hearing to answer questions regarding project sound level impacts.

Jackson Fuller Energy Storage Project, El Paso County, CO Performed sound model analyses and pre-construction measurements for a 100 MW stand-alone battery storage facility in El Paso County, CO. Developed sound mitigation measures to enable the Project to meet local sound level ordinances.

Shepherd's Run Solar, Columbia County, NY Performed a sound modeling analysis of a proposed solar project in Columbia County, NY to evaluate potential impacts from the project on the surrounding community in support of the 94-c permitting process.

Rogue's Wind, Cambria County, PA Performed a sound model analysis of a proposed wind farm near Patton, PA to evaluate potential impacts from the project on the surrounding community.

Oak Run Solar, Madison County, OH Performed a sound model analysis of a proposed 800 MW solar facility in Madison County Ohio to evaluate the project impacts and ensure that they meet the requirements in the Ohio Administrative Code identified in the Ohio Power Siting Board's Certificate Applications for Electric Power Generation Facilities.

Cereal City Solar, Calhoun County, MI Performed a sound model analysis for a proposed solar facility near Battle Creek in Calhoun County, MI to evaluate potential impacts from the project on the surrounding community.

Circleville Solar, Pickaway County, OH Performed a sound model analysis for a proposed 70 MW solar facility in Pickaway County, OH to evaluate potential impacts from the project on the surrounding community.

Beecher Solar, Lenawee County, MI Performed a sound modeling analysis of a proposed solar project in Lenawee County, MI to evaluate potential impacts from the project on the surrounding community and demonstrate compliance with the local noise regulations.

Battery Energy Storage Systems, Multiple locations. Performed sound model analyses for multiple small- to medium- scale battery energy storage systems in several northeastern states to evaluate compliance with local and/or state noise regulations.

Biogas Facility, Junction City, OR Developed and executed a sound level measurement program for a proposed biogas facility. Constructed a model to predict sound level impacts due to the facility at nearby residences and evaluated against local sound level limits.

NATURAL GAS INFRASTRUCTURE

Cape Cod Canal Bridge Relocation Project, Barnstable County, MA Planned and oversaw the pre-construction sound level evaluations for four new natural gas M&R stations and two HDD crossings in Barnstable County, MA to support the Federal Energy Regulatory Commission (FERC) environmental review process for natural gas projects. The Project was also evaluated under the MassDEP Noise Policy and against local regulations. Reported methods and results the support submission of Resource Report 9.

Algonquin Gas Transmission Pipeline Replacement Project, Newport County, RI Planned and oversaw the pre-construction sound level evaluations for two HDD crossings in Newport County, RI to support the FERC environmental review process for natural gas projects. Performed a complaint investigation during construction to recommend additional mitigation measures.

Narragansett Electric Company Mobile LNG Facility, Portsmouth, RI Developed and executed a sound level measurement program and sound level modeling to evaluate community impacts due to an LNG vaporizer on Aquidneck Island, RI. Evaluated the expected impacts against local noise limits.

Rover Pipeline Project, Multiple Locations, OH and WV Developed and conducted both pre-construction and post-construction sound level measurement programs at several natural gas compressor stations to ensure compliance with the FERC noise criterion. Constructed noise models and designed noise mitigation measures.

Mountain Valley Pipeline Project, Multiple Locations, WV Developed and conducted pre-construction sound level measurement programs at three natural gas compressor stations to evaluate compliance with the FERC noise criterion. Constructed noise models and designed noise mitigation measures. Assisted with composition of Resource Report 9.

Gulf Coast Southbound Project, Multiple Locations, TX Developed and conducted both pre-construction and post-construction sound level measurement programs at three natural gas compressor stations to ensure compliance with the FERC noise criterion. Constructed noise models and designed noise mitigation measures and assisted in development of Resource Report 9.

Gulf Coast Expansion Project, Cass County TX Developed and conducted pre-construction sound level measurement program for a new compressor station to evaluate compliance with FERC noise criterion. Constructed a sound level model and assisted in development of Resource Report 9.

Compressor Station 261, Agawam, MA Developed and executed multiple sound level measurement programs for an existing natural gas compressor station in Agawam, MA. Constructed and calibrated a sound model of the existing and proposed modified station equipment to demonstrate compliance with the FERC noise criterion and the MassDEP Noise Policy.

Longmeadow Meter Station, Longmeadow, MA Developed and executed a sound level measurement program for a proposed meter station and associated horizontal directional drilling. Constructed a sound level model to predict impacts from both facility operations and construction to demonstrate compliance with the FERC noise criterion and the MassDEP Noise Policy.

Rye Meter Station, Rye, NY Developed and oversaw a sound level measurement program for an existing meter station in Rye, NY. Constructed and calibrated a sound model of the existing equipment and designed mitigation measures.

COMMONWEALTH OF MASSACHUSETTS
TOWN OF HUDSON
BOARD OF HEALTH

B-P Trucking, Inc., and Town of Hudson Department of Public Works,	Request for Minor Modification to Site Assignment 1 Municipal Drive a/k/a 300 Cox Street Hudson, MA

PRE-FILED DIRECT TESTIMONY OF SCOTT W. THORNTON, P.E.

I, Scott W. Thornton, under oath and subject to the penalties of perjury, do testify as follows:

QUALIFICATIONS

1. I have a Bachelor's Degree in Civil Engineering from Northeastern University and am presently a Partner, Senior Traffic Engineer, and the Manager of the Transportation Department at Vanasse & Associates, Inc. ("VAI"), a transportation engineering and planning consulting firm with an office in Andover, Massachusetts.

2. I am a Registered Professional Engineer in Massachusetts, New Hampshire, and Connecticut. I have over thirty years of experience in traffic engineering and transportation planning, which includes preparing traffic impact assessments, corridor studies, signal warrant analyses, functional design reports, road safety audits, and parking evaluations for clients throughout New England, including submissions under the Massachusetts Environmental Policy Act (MEPA) and the Office of State Traffic Administration in Connecticut. I have extensive experience in the analysis of roadways, intersections, roundabouts, highway interchanges, and traffic signal systems, as well as in the design of pedestrian improvements and traffic calming measures. I have provided expert witness testimony at board of health site assignment hearings, both on behalf of project applicants and as a peer review consultant. A summary of my education and experience is attached hereto as **Exhibit A**.

SCOPE OF ENGAGEMENT AND TESTIMONY

3. VAI was retained by Sanborn Head & Associates, Inc. ("SHA"), on behalf of B-P Trucking, Inc. ("B-P"), in connection with proceedings under the Massachusetts Environmental Policy Act, G.L. c. 30, §§ 61-62L ("MEPA"), to analyze anticipated traffic impacts from the proposed project consisting of construction of a new transfer station at 1 Municipal Drive a/k/a 300 Cox Street in Hudson (the "Site").

4. The purpose of this testimony is to support B-P's Request for Minor Modification at the Site by explaining how VAI's traffic study demonstrates that traffic impacts from the proposed minor modification will not constitute a danger to public health, safety or the environment.

PROJECT INFORMATION

5. B-P and the Town of Hudson Department of Public Works (the "Hudson DPW") propose a minor modification of the existing site assignment for the Site. The Hudson Board of Health issued a site assignment for a refuse transfer station at the Site in January 1986. The Site is an approximately 72-acre parcel which currently includes the existing solid waste transfer station as well as other municipal facilities, such as the Hudson Fire Department, Hudson Wastewater Treatment Facility, and the combined Hudson Police Department and Public Works Facility. The existing transfer station was constructed in 1988 and began operating in 1996. Since 1999, the transfer station has been operated by B-P. The Hudson DPW is the owner of the Site. B-P plans to relocate the existing transfer station operation further into the interior of the Site within a new transfer station building that it plans to construct.

6. The 1986 site assignment did not stipulate a capacity or total volume limit for solid waste received at the transfer station; however, B-P's operating permit includes a daily tonnage limit of 350 tons per day (tpd). The proposed minor modification would set a limit of 850 tpd of solid waste that B-P could accept at the new transfer station building that B-P proposes to construct in another location on the Site.

7. The location of the proposed transfer station building will be near the southeastern corner of the Site. The new building will be located approximately 1,800 feet from Cox Street (the existing transfer station is approximately 350 feet from Cox Street). The abutting Joseph L. Mulready Elementary School will be located approximately 1,200 feet from the proposed transfer station building (the existing transfer station is approximately 350 feet from the school). The nearest residences to the proposed transfer station building will be approximately 1,500 feet to the southeast along Wilkins Street (Route 62), approximately 1,760 feet west along Cox Street, and approximately 1,900 feet northwest on Elaine Circle (the existing transfer station is approximately 275 feet from the nearest residences on Cox Street).

MATERIALS SUPPORTING OPINION

8. As part of the MEPA process, VAI prepared a Transportation Impact Assessment ("TIA") to identify the traffic impacts associated with the proposed facility. VAI prepared the TIA in accordance with MassDOT's *Guidelines for Transportation Impact Assessment* and pursuant to the standards of the traffic engineering and transportation planning professions for the preparation of such reports. The TIA is Section 7.0 of the Draft Environmental Impact Report dated April 1, 2024, with supporting attachments in Appendix D, which is in the Administrative Record as Exhibit 6.

9. The TIA involved three stages: (i) an assessment of existing conditions in the study area, including an inventory of roadway geometrics, pedestrian and bicycle facilities, on-street parking, public transportation services, and a review of available traffic count data; (ii) projections of future traffic conditions based on travel demand forecasts for the proposed facility and expected traffic growth independent of the project; and (iii) an evaluation of mitigation measures to address traffic and safety issues identified in the second stage.

10. The study area of the TIA contained the major roadway which provides access to the existing and proposed transfer station (Cox Street) as well as sixteen intersections in Hudson and Marlborough which are expected to accommodate the majority of anticipated traffic for the future transfer station. The study area is depicted graphically in Figure 7-1 and Figure 7-2 of the TIA and the study intersections are listed on page 7-2.

11. Baseline traffic-volume conditions were obtained through historical traffic count data conducted in May 2022, January 2023, March 2023, and September 2023. New traffic count data was collected in December 2023 and March 2024 during morning and afternoon peak periods. Automatic traffic recorder data was collected over a 24-hour period from May 25 to May 26, 2022. VAI applied seasonal traffic adjustments of 1 and 4 percent to the January and December traffic volumes consistent with MassDOT guidelines. The 2023 traffic counts were grown by a background traffic growth rate of 1.0 percent per year to establish the baseline condition for 2024.

OPINIONS REGARDING MINOR MODIFICATION

12. This testimony specifically addresses potential traffic impacts anticipated to be implicated by the increase in daily tonnage limit proposed in the Request for Minor Modification, as well as anticipated traffic mitigation measures B-P will implement at the new facility.

13. Based on the results of the TIA, VAI made the following conclusions:

    (a) The baseline traffic condition for Cox Street is 7,060 vehicles per day (vpd) with 587 vehicles per hour (vph) during the weekday morning peak hour and 555 vph during the weekday afternoon peak hour. During the weekday morning peak hour, 64 percent of traffic travels southbound and during the weekday afternoon peak hour, 62 percent of traffic travels northbound.

    (b) Existing transfer station truck trips based on data collected in May 2022 (the month with the peak number of scale crossings at the existing facility) total 754 daily truck trips (374 incoming and 380 outbound) on an average weekday.

    (c) The increase in tonnage from 350 tpd to 850 tpd is expected to generate a total of 370 new inbound truck trips to the facility (185 trucks entering to drop-off material; 185 trucks exiting empty) and a total of 44 new outbound truck trips (22 semi-trailers exiting full; 22 semitrailers returning empty) on an average weekday.

    (d) When including daily trips from an additional 17 new employees that are anticipated to be working at the new transfer station (17 entering and 17 exiting per day, for a total

of 34 trips), the proposed facility is expected to add approximately 448 new vehicle trips on an average weekday (two-way, 24-hour volume), with 90 new truck trips (45 entering and 45 exiting) expected during the weekday morning peak hour and 34 new truck trips (17 entering and 17 exiting) expected during the weekday afternoon peak hour. These projections represent a conservative analysis that merges the facility's peak projections with those of the adjacent roads.

(e) Project-related traffic increases external to the study area are projected to range between 2 to 28 vehicles during peak hours, with traffic percentage increases ranging from 0.1 to 1.5 percent, when compared to the 2031 no-build scenario.

(f) The proposed facility will result in minimal impact on motorist delays at the study intersections, as compared to future no-build scenarios.

(g) No apparent safety deficiencies were noted with respect to the motor vehicle crash history at the study area intersections in the immediate area of the Site.

(h) Lines of sight at the proposed Site driveway where it will intersect with Cox Street were found to exceed or could be made to meet or exceed the recommended minimum distance for safe operation based on the appropriate approach speed.

14. VAI concluded that traffic increases will not result in significant increases on overall traffic volumes or traffic delays within the study area and the site driveway will provide efficient access to and from the development.

15. VAI also concluded that project-related traffic can be adequately accommodated within the existing infrastructure with minimal impact on the traffic operations within the study area.

16. VAI also analyzed alternate route options for semi-trailer trucks under B-P's control as it determined these vehicles have the most impact on air quality relative to environmental justice (EJ) communities. VAI concluded that three of five possible routes are viable and recommended for use based on direction of travel, minimization of disruptive impacts to local traffic, and avoidance of routes with weight restrictions.

17. VAI made certain recommendations for traffic mitigation measures for the proposed facility. Several of these recommendations, which are listed below, were also referenced in the Secretary's FEIR Certificate as Mitigation and Section 61 Findings:

(a) Install STOP-signs (Manual on Uniform Traffic Control Devices (MUTCD) R1-1), with a painted STOP-bar included, at all driveways.

(b) All signs and other pavement markings to be installed within the Project site shall conform to the applicable standards of the current MUTCD.

(c) Prompt removal of snow within sight triangle areas of the Project site driveway where such accumulations would impede sight lines.

(d) Maintain landscaping or signage along the site frontage or the site driveway to be no higher than 24 inches or be set back sufficiently from the edge of the roadways so as not to inhibit the available sightlines.

(e) Implement off-site improvements in collaboration with the Town of Hudson DPW, including:

i. Installation of appropriate warning signage, such as MUTCD designation W8-6 (Truck Crossing), along Main Street approximately 200 ft away from the intersection with Mackin Street, to alert motorists driving along Main Street to the possibility of trucks crossing at the intersection;

ii. Relocation of Main Street eastbound stop bar approximately 20 ft to the west of the intersection with Cox Street in order to reduce the level of encroachment from transfer station outbound trailers;

iii. Extension of the existing scored concrete island to replace the existing raised island in order to allow trucks to safely navigate the turn from Cox Street onto Main Street; and

iv. Installation of speed limit signage on Cox Street near the Site.

18. B-P agrees with the proposed traffic mitigation measures and would support the Board of Health making them conditions to any decision granting the proposed minor modification.

19. Accordingly, it is my professional opinion that the traffic impacts from the new facility operations at the Site as modified by the proposed minor modification will not constitute a danger to the public health, safety, or the environment.

Signed under the pains and penalties of perjury this 30th day of January, 2026.

DocuSigned by:
Scott W. Thornton
1FEDE5FE53EC48B...

Scott W. Thornton, P.E.

CERTIFICATION PURSUANT TO 310 CMR 16.07

Pursuant to 310 CMR 16.07, I, Scott W. Thornton, hereby state that I have no legal interest in the proposed site and certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties both civil and criminal for submitting false information including possible fines and imprisonment.

DocuSigned by:
Scott W. Thornton
1FEDE5FE53EC48B...

Scott W. Thornton, P.E.
Vanasse & Associates, Inc.

Dated: January 30, 2026

EXHIBIT A

Scott W. Thornton, P.E – Partner

Senior Transportation Engineer
Transportation Department Manager

Education

Northeastern University, B.S.C.E., 1995

Professional Registrations

Registered Professional Engineer: MA #49066, NH #10142, CT #27058

SUMMARY OF EXPERIENCE

Mr. Thornton is a Partner at Vanasse & Associates, Inc., with over 30 years' experience in the areas of Traffic Engineering and Transportation Planning. Mr. Thornton has conducted numerous analyses including Impact Assessments, Corridor Studies, Signal Warrant Analyses, Functional Design Reports, and Parking Evaluations for a variety of land uses at Vanasse & Associates, Inc. These include major retail developments, office parks, supermarkets, residential developments, mixed-use developments, hospitals, and schools in all states in the New England area. He has been involved in various aspects of Traffic Engineering, including the preliminary design and analysis of roadways, intersections, roundabouts, highway interchanges, and traffic signal systems. He has also been involved with the design and construction of pedestrian improvements, traffic calming measures, and on-site parking support and traffic monitoring of traffic management plans for special events. He has experience in developing design and analyses to address local and state permitting issues and has served as both transportation consultant and lead consultant responsible for preparation, oversight, and filing Connecticut Office of the State Traffic Administration (OSTA) and Massachusetts Environmental Policy Act (MEPA) submittals, which typically deal with transportation, hydrology, air quality, water supply, and sewer disposal issues.

Representative Projects

Construction & Demolition Debris Handling Facility Modifications – Ware, Massachusetts. This project included permit modifications for the facility to allow an increase in the daily tonnage acceptance rate. Aspects of this project included review of existing conditions including intersection crash histories, development of vehicle trip-generation rates for the existing operations on-site, and extrapolation to the proposed condition to identify trip increases and the project effect on future traffic operations.

Solid Waste Management Facility Modifications – Fitchburg/Westminster, Massachusetts. This project included modifications to the Board of Health site assignment for the facility to allow an increase in the maximum acceptance rate. A later modification allowed an increase in maximum height and an increase in site assigned area. Aspects of this project included detailed review of previously prepared traffic studies, review of updated traffic volume and crash histories, and review of site trip generation following the modifications.

Re-opening of Town Landfill – Clinton, Massachusetts. Prepared estimates of traffic impact for re-opening of the Clinton Town Landfill to identify the need for road improvements in downtown Clinton and the site vicinity for use in the project's state Massachusetts Environmental Policy Act (MEPA) permit and approval.

Landfill Modifications – Barre, Massachusetts. This project included modifications to the Board of Health site assignment for the facility to allow an increase in the maximum acceptance rate. Aspects of this project included review of existing traffic and crash conditions in the immediate study area, develop estimates of site trip generation following the modifications, and analysis of project impact at nearby intersections.

Traffic Peer Review Consultant – Various Locations. Reviewed traffic impact studies for residential, commercial, and retail uses in Holbrook, Rockport, Tewksbury, Westborough, and was the traffic peer consultant for Hampton, New Hampshire extending over a four-year period. Most recently represented the Town of Holbrook Planning Board in their review of a waste transfer station. Items included review of site circulation, intersection and roadway layouts, truck movements, and coordination with town planning and public safety officials.

COMMONWEALTH OF MASSACHUSETTS
TOWN OF HUDSON
BOARD OF HEALTH

B-P Trucking, Inc., and Town of Hudson Department of Public Works,	Request for Minor Modification to Site Assignment 1 Municipal Drive a/k/a 300 Cox Street Hudson, MA

PRE-FILED DIRECT TESTIMONY OF STEPHEN E. WRIGHT, P.E.

I, Stephen E. Wright, under oath and subject to the penalties of perjury, do testify as follows:

QUALIFICATIONS

1. I have a bachelor's degree in civil engineering from the University of Massachusetts-Amherst and a master's degree in civil engineering from Northeastern University. I am presently a Senior Vice President at Sanborn, Head & Associates, Inc. ("SHA"), an engineering and consulting firm with offices in Bedford, New Hampshire, Boston, Massachusetts, and in Colorado, Delaware, Pennsylvania, and Vermont. I am a registered Professional Engineer in Massachusetts and New Hampshire.

2. I have over 35 years of experience in a wide range of solid waste design, permitting, and construction projects, including landfill design, environmental assessments, closures, transfer station and materials recovery facility design, solid waste management planning, and construction management. My work includes managing multi-disciplinary environmental projects from the concept planning and feasibility phase, through design, bidding, and construction. A summary of my education and experience is attached hereto as **Exhibit A**.

SCOPE OF ENGAGEMENT AND TESTIMONY

3. B-P Trucking, Inc. ("B-P"), retained SHA to manage the environmental planning, permitting, design, and construction of an upgraded municipal transfer station in coordination with the Town of Hudson Department of Public Works ("Hudson DPW"), including B-P's request for a minor modification to site assignment for the property at 1 Municipal Drive a/k/a 300 Cox Street in Hudson (the "Site"). My work has involved reviewing the proposed project for compliance with the site suitability criteria set forth in the Massachusetts Department of Environmental Protection's Site Assignment Regulations for Solid Waste Facilities at 310 CMR 16.40(3)(d) and 16.40(4).

PROJECT INFORMATION

4. B-P and the Hudson DPW propose a minor modification of the existing site assignment for the Site. The Hudson Board of Health issued a site assignment for a refuse transfer station at the Site in January 1986. The Site is an approximately 72-acre parcel which currently includes the existing solid waste transfer station as well as other municipal facilities, such as the Hudson Fire Department, Hudson Wastewater Treatment Facility, and the combined Hudson Police Department and Public Works Facility. The existing transfer station was constructed in 1988 and began operating in 1996. Since 1999, the transfer station has been operated by B-P. The Hudson DPW is the owner of the Site. B-P plans to relocate the existing transfer station operation further into the interior of the Site within a new transfer station building that it plans to construct.

5. The 1986 site assignment did not stipulate a capacity or total volume limit for solid waste received at the transfer station; however, B-P's operating permit includes a daily tonnage limit of 350 tons per day. The proposed minor modification would set a limit of 850 tons per day of solid waste that B-P could accept at the new transfer station building that B-P proposes to construct on the Site.

6. The location of the proposed transfer station building will be near the southeastern corner of the Site. The new building will be located approximately 1,800 feet from Cox Street (the existing transfer station is approximately 350 feet from Cox Street). The abutting Joseph L. Mulready Elementary School will be located approximately 1,200 feet from the proposed transfer station building (the existing transfer station is approximately 350 feet from the school). The nearest residences to the proposed transfer station building will be approximately 1,500 feet to the southeast along Wilkins Street (Route 62), approximately 1,760 feet west along Cox Street, and approximately 1,900 feet northwest on Elaine Circle (the existing transfer station is approximately 275 feet from the nearest residences on Cox Street).

MATERIALS SUPPORTING OPINION

7. Epsilon, with support from SHA, prepared submissions on behalf of B-P to the Massachusetts Environmental Policy Act ("MEPA") Office in connection with the environmental review of the proposed new facility. These submissions included a Draft Environmental Impact Report dated April 1, 2024 ("DEIR"), and a Final Environmental Impact Report dated October 15, 2024 ("FEIR"). Copies of the DEIR and the FEIR are included in the Administrative Record as Exhibits 6 and 7, respectively. The Secretary of the Executive Office of Energy and Environmental Affairs ("EEA") issued a certificate on November 29, 2024, determining that the FEIR adequately and properly complied with MEPA and its implementing regulations.

8. My opinions in this pre-filed testimony are based on analysis and information contained in the DEIR and the FEIR, as referenced herein, as well on other pre-filed testimony submitted on behalf of B-P in connection with this minor modification proceeding, and on other publicly available databases, GIS mapping applications, and other materials as referenced herein.

OPINIONS REGARDING MINOR MODIFICATION

9. This testimony addresses the Site's compliance with the applicable site suitability criteria in 310 CMR 16.40 in the context of the increase in daily tonnage limit proposed in the Request for Minor Modification.

10. In support of this testimony and the Request for Minor Modification, SHA has prepared mapping to depict various resources, land uses, and other information relevant to the Site's compliance with the siting criteria. The mapping is depicted on the following figures, attached hereto as **Exhibit B**:

- Figure 1 Half-Mile Land Use Plan
- Figure 2 Half-Mile Water Resources Plan
- Figure 3 Wetland Resources Site Plan & On-Site Buffer Areas
- Figure 4 Boring Locations in Proposed Building Area

11. Figures 1 and 2 depict land use and water resource features within one-half mile of the Site, consistent with the aerial extents required by MassDEP when applying for a new site assignment or a major modification to an existing site assignment. The two figures depict the half-mile offset from the Site property boundary as well as a 500-foot property line offset. The 500-foot offset reflects MassDEP mapping requirements for depicting residential dwellings and commercial buildings near the property boundary when applying for a new site assignment or a major modification to an existing site assignment.

12. Based on my review of relevant information sources as described in more detail in the paragraphs below, it is my professional opinion that the Site as modified by the Request for Minor Modification complies with all applicable facility specific and general site suitability criteria set forth in 310 CMR 16.40(3)(d) and 16.40(4), respectively.

Facility Specific Site Suitability Criteria
310 CMR 16.40(3)(d)

13. The criteria set forth in 310 CMR 16.40(3)(d) apply specifically to solid waste handling facilities and are based on the location of the waste handling area relative to each of the criteria. The waste handling area refers to the building space within which waste is received (i.e., the MSW and C&D tipping floor areas) and transferred into the transfer trailers located in the building's two trailer pits. For added conservatism, the waste handling area also includes the recyclables processing portion of the proposed building. Therefore, when considering the facility specific siting criteria below, the waste handling area of the proposed facility refers to the full footprint of the building, excluding the office/administration space.

310 CMR 16.40(3)(d)(1)
Zone I of a Public Water Supply Well or Wellfield

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (1) the waste handling area would be within the Zone I of a public water supply.

14. The waste handling area of the proposed facility is not within a Zone I protective radius of a public water supply well or wellfield. According to the MassGIS MassMapper database, the closest Zone I is a 100-foot wellhead protection radius associated with the "Stow Industrial (FLB Incorporated)" Non-Transient Non-Community (NTNC)[1] water supply well located in Stow, Massachusetts (Source ID 2286019-01G). The well is located approximately 2,600 feet east of the Site's eastern property boundary and shown on the Half Mile Water Resource Plan (Figure 2). The next closest public water supply Zone I is the 400-foot wellhead protection radius associated with the Town of Hudson public water supply well referred to as "Chestnut Street Well 1A" (Source ID 2141000-07G). The 400-foot protection radius for the well is located approximately 4,260 feet southeast of the Site's southeastern property corner.

310 CMR 16.40(3)(d)(2)
Interim Wellhead Protection Area (IWPA) and Zone II Areas

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (2) the waste handling area would be within the Interim Wellhead Protection Area (IWPA) or a Zone II of an existing public water supply well within a proposed drinking water source area, provided that the documentation necessary to obtain a source approval has been submitted prior to the earlier of either the site assignment application, or if the MEPA process does apply, the Secretary's Certificate on the Environmental Notification Form or Notice of Project Change, or where applicable, the Secretary's Certificate on the EIR or Final EIR, unless restrictions are imposed to minimize the risk of an adverse impact to the groundwater; and either (a) the proponent can demonstrate to the satisfaction of the Department that the facility cannot reasonably be sited outside the IWPA or Zone II; or (b) there would be a net environmental benefit to the groundwater by siting the facility within the Zone II or the IWPA where the site has been previously used for solid waste management activities.

15. The Site is not located within or adjacent to an Interim Wellhead Protection Area (IWPA) or Zone II area. Accordingly, the waste handling area of the proposed facility will likewise not be located within an IWPA or Zone II wellhead protection area. The closest Zone II is that associated with the Town of Hudson public water supply wellfield comprised of the Chestnut Street Wells (Well #1A, #2, and #3) and the "Kane Well" located off Main Street. The closest the Zone II boundary for these wells comes to the Site property boundary is approximately 1,300 feet from the southeastern property line corner. The Zone II boundary nearest the Site is shown on Figure 2. The Chestnut Street Wells and the Kane Well are

[1] A Non-Community Non-Transient (NTNC) water system means a public water system that is not a community water system and that regularly serves at least 25 of the same persons or more approximately four or more days per week, more than six months or 180 days per year, such as a workplace providing water to its employees.

located within a USGS-delineated Potentially Productive Aquifer ("PPA"). The PPA is located within the Zone II for the wells. The western limit of the PPA nearest the Site is shown on Figure 2, located in the vicinity of Gleasondale Road, Marlboro Road, and Chestnut Street. With respect to proposed drinking water sources, SHA has confirmed with the Hudson Department of Public Works that the Town is not currently seeking a source approval for a new public water supply well. Therefore, the Site, and more specifically the proposed facility's waste handling area, is not located within a Proposed Drinking Water Source Area.

310 CMR 16.40(3)(d)(3)
Zone A of a Surface Water Supply

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (3) the waste handling area would be within the Zone A of a surface drinking water supply.

16. The Site is not located within a Zone A (400-foot offset) of a surface drinking water supply. Accordingly, the waste handling area of the proposed facility will likewise not be located within a Zone A. The closest Zone A is associated with the Gates Pond Reservoir, a surface water supply for the Town of Hudson located in the Town of Berlin. The Zone A for Gates Pond is located approximately 3.2 miles southwest of the Site.

310 CMR 16.40(3)(d)(4)
Private Water Supplies

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (4) the waste handling area would be within 500 feet upgradient, and where not upgradient, within 250 feet, of an existing or potential private water supply well existing or established as a Potential Private Water Supply at the time of submittal of the application.

17. Based on borings advanced in the area of the proposed transfer station building, groundwater near the proposed waste handling area flows in a northerly direction towards the Assabet River. Private well data available from the MassDEP Well Location Viewer GIS database indicates that the closest property with a private drinking water well is located at 9 Zina Road in Hudson, approximately 2,300 feet northwest of the proposed waste handling area. The same database shows properties further from the Site where private drinking water wells are located. The locations of these properties are shown on Figure 2. As shown on Figure 2, the waste handling area of the proposed facility is well over 500 feet from the nearest private water supply wells.

310 CMR 16.40(3)(d)(5)
Occupied Dwellings and Other Occupied Facilities

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (5) the waste handling area of … (b) any other transfer station or any handling facility is 500 feet from: (i) an occupied residential dwelling; or (ii) a prison, health care facility, elementary school, middle school or high school, children's preschool, licensed day care center, or senior center or youth center, excluding equipment storage or maintenance structures.

18. As shown on the Half-Mile Land Use Plan (Figure 1), there are no residences or other occupied facilities located within 500 feet of the proposed facility's waste handling area. Based on a review of Town of Hudson and Town of Stow Assessors records, the closest occupied residential dwellings are located on a portion of Wilkins Street south/southwest of the Site. The closest of these dwellings (20 Wilkins Street) is approximately 1,500 feet from the proposed waste handling area. The closest residential dwelling on Cox Street (304 Cox Street) is approximately 1,760 feet east/southeast of the proposed waste handling area.

19. With respect to the K-12 school setback criterion, the Mulready Elementary School located at 306 Cox Street is the closest school to the proposed waste handling area. The building at its closest is located approximately 1,160 feet from the proposed waste handling area. The Mulready School is also the location of a licensed day care center (Mulready Children's After School Programs (CHAPS)), which is the closest day care to the proposed waste handling area.

20. All other occupied facilities identified in 310 CMR 16.40(3)(d)(5) are located more than one mile from the Site. The closest senior center (Hudson Senior Center) is located approximately 1.2 miles west/southwest of the Site, roughly the same distance of the closest youth center (Boys & Girls Club – Hudson Clubhouse), where both the Senior Center and Hudson Clubhouse are located on Church Street in Hudson. The closest health care facility to the Site is the Marlborough Hospital, located approximately 3 miles south of the Site. Lastly, the closest prison facility, the Northeast Correctional Center in Concord, Massachusetts, is located approximately 8.5 miles from the Site.

310 CMR 16.40(3)(d)(6)
Riverfront Area

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (6) the waste handling area would be within the Riverfront Area as defined at 310 CMR 10.00.

21. The Riverfront Area is a 200-foot-wide corridor located on each side of a perennial stream or river. The Site abuts the Assabet River, therefore there is Riverfront Area on the property; however, the waste handling area of the proposed facility will not be located within the Riverfront Area. The boundary of the Riverfront Area is shown on the Wetland Resources Site Plan & On-Site Buffer Areas figure (Figure 3). The waste handling area is located no closer than 625 feet from the outer boundary of the Riverfront Area.

310 CMR 16.40(3)(d)(7)
Depth to Groundwater

No site shall be determined to be suitable or be assigned as a solid waste handling facility where … (7) the maximum high groundwater table would be within two feet of the ground surface in areas where waste handling is to occur unless it is demonstrated that a two foot separation can be designed to the satisfaction of the Department.

22. In December 2018, SHA conducted a subsurface exploration program in the area of the proposed new transfer station. Under SHA's observation, seven borings were advanced in the area of the proposed building. The boring locations are shown on Figure 4.

Groundwater was encountered in five of the borings at elevations ranging from 195.02 to 199.70 feet (referenced to the North American Vertical Datum ("NAVD") of 1988). Based on these observed depths, the average groundwater elevation in the building area is 198.10, as shown in the table below.

Depth to Groundwater and Groundwater Elevation in Proposed Building Area Based on Subsurface Borings Advanced in December of 2018

Boring ID	Ground Elevation (NAVD 1988)	Depth of Boring (ft bgs)	Depth to Groundwater (ft bgs)	Groundwater Elevation NAVD 1988)
B-1	215.77	27	17	198.77
B-2	205.35	17	NE	NE
B-3	212.11	25	14.6	197.51
B-4	232.10	28.4	NE	NE
B-4A	208.02	17	13	195.02
B-5	230.70	32	31	199.70
B-6	206.52	9	7	199.52
Average Groundwater Elevation in Proposed Building Area				**198.10**

ft bgs = feet below ground surface
NE = Not Encountered

23. Boring B-3 was completed as an observation well and the depth to groundwater was measured at the well on March 20, 2019 (the well is no longer in place). The groundwater elevation recorded at that time was 196.97, representing a stabilized groundwater condition in the building area, slightly lower than the average groundwater elevation in the building area as summarized in the table. For the purposes of this siting criterion evaluation, high groundwater conditions are based on an elevation of 198.5 in the building footprint (waste handling) area.

24. As described in detail in the MEPA filings (Section 8 of the DEIR and Section 3 of the FEIR), the proposed transfer station building footprint consists of: (1) a tipping floor area, where solid waste is received, handled, and loaded into transfer trailers; (2) two lower elevation trailer pits with each sized to store one transfer trailer for solid waste loading from the tipping floor; (3) a recyclables processing area, which will have the same floor elevation as the tipping floor; and (4) an office/administration area, with elevation similar to the tipping floor elevation. The tipping floor will have a finished floor elevation of approximately 218 feet and the two trailer pits will have a finished floor elevation of approximately 206 feet.

25. The waste handling activities that will occur in contact with the floor of the building will be those performed on the tipping floor, where the minimum 2-foot groundwater separation specified in 310 CMR 16.40(3)(d)(7) would apply. More broadly, applying the minimum 2-foot groundwater separation to the finished floor of the two trailer pits would require that the maximum high groundwater below the pits not exceed elevation 204 feet. As shown in the table below, the proposed facility meets the minimum groundwater separation criterion provided in the 310 CMR 16.40(3)(d)(7) for both the tipping floor and trailer pit portions of the proposed building.

Proposed Transfer Station Waste Handling Separation to High Groundwater

Area	Finished Floor Elevation (NAVD 1988)	High Groundwater Elevation (NAVD 1988)	Separation Between Groundwater & Finished Floor	Minimum Separation Required [per 310 CMR 16.40(3)(d)(7)]	Minimum Separation Criterion Met?
Tipping Floor	218	198.5	19.5 feet	2 feet	Yes
Trailer Pits	206	198.5	7.5 feet	2 feet	Yes

General Site Suitability Criteria
310 CMR 16.40(4)

26. The criteria set forth in 310 CMR 16.40(4) apply to all types of solid waste management facilities (landfills, combustion facilities, and handling facilities).

310 CMR 16.40(4)(a)
Agricultural Land

No site shall be determined to be suitable or be assigned as a solid waste management facility where: (1) the land is classified as Prime, Unique, or of State and Local Importance by the United States Department of Agriculture, Natural Resources Conservation Service; or (2) the land is deemed Land Actively Devoted to Agricultural or Horticultural Uses, except where the facility is an agricultural composting facility; and (3) a 100 foot buffer would not be present between the facility and those lands classified at 310 CMR 16.40(4)(a)(1) or (2).

27. Because the 72.4-acre Site is already site-assigned, this siting criterion is not applicable to the siting of the proposed facility nor is it applicable to the MassDEP Authorization to Construct or Authorization to Operate permitting processes. However, for informational purposes, the following narrative provides a summary of agricultural land conditions on and near the Site.

28. The Site does not contain any land deemed Land Actively Devoted to Agricultural or Horticultural Uses nor are there any such lands within 100 feet of the Site property boundary. This is the case now and was the case when the Site was first site-assigned in January 1986, at which time the Town's wastewater treatment plant operations had already occupied the Site for many years. With respect to soil classification available from the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), there is both Prime Farmland and Farmland of Statewide Importance mapped on the Site. The NRCS soil survey mapping is consistent with the mapping available from the MassGIS MassMapper database, where the areas of Prime Farmland and Farmland of Statewide Importance are shown on the Half-Mile Land Use Plan (Figure 1).

29. As shown on Figure 1, there are two isolated areas of Prime Farmland that cross onto the Site. One area is located on the southwestern end of the site-assigned parcel off of Cox Street and fully encompasses the existing transfer station operations and a portion of the Mulready Elementary School property. The other area of Prime Farmland is located along a portion of the southern and eastern Site property line, extending onto the abutting

Riverside Gun Club property. There are three isolated areas of Farmland of Statewide Importance mapped on the site-assigned property. One area abuts the Assabet River in the northwestern corner of the Site and abuts Cox Street and a portion of the exiting fire department building. The second area is located along a portion of the southern edge of the property where part of the DPW operations and wastewater treatment plant operations are located. The third area of Farmland of Statewide Importance is mapped in the northeastern corner of the Site.

30. The current uses on and near the Site support the interpretation that NRCS-mapped Prime Farmland and Farmland of Statewide Importance in the area does not represent land that is suitable or valued for food crop production and would not be used for such purposes.

310 CMR 16.40(4)(b)
Traffic Impacts

No site shall be determined to be suitable or be assigned as a solid waste management facility where traffic impacts from the facility operation would constitute a danger to the public health, safety, or the environment taking into consideration the following factors: (1) traffic congestion; (2) pedestrian and vehicular safety; (3) road configurations; (4) alternate routes; and (5) vehicle emissions.

31. As described in the Request for Minor Modification to Site Assignment, as part of the MEPA process, B-P engaged Vanasse & Associates, Inc. ("VAI"), to prepare a Transportation Impact Assessment ("TIA") to identify the traffic impacts associated with the proposed facility (other than air quality impacts from vehicle emissions). The TIA and traffic impacts associated with the proposed facility are the subject of the Pre-Filed Testimony of Scott W. Thornton, P.E. It is Mr. Thornton's opinion that the traffic impacts from the new facility operations at the Site as modified by the proposed minor modification will not constitute a danger to the public health, safety, or the environment.

32. Traffic impacts from vehicle emissions were analyzed by Epsilon during the MEPA process as part of Epsilon's overall analysis of the proposed project's potential air quality impacts. The potential air quality impacts are the subject of the Pre-Filed Testimony of A.J. Jablonowski, P.E., of Epsilon. It is Mr. Jablownoski's opinion that vehicle emissions from the Site as modified by the proposed minor modification will not constitute a danger to the public health, safety, or the environment.

310 CMR 16.40(4)(c)
Wildlife and Wildlife Habitat

No site shall be determined to be suitable or be assigned as a solid waste management facility where such siting would: (1) have an adverse impact on Endangered, Threatened, or Special Concern species listed by the Natural Heritage and Endangered Species Program of the Division of Fisheries and Wildlife in its database; (2) have an adverse impact on an Ecologically Significant Natural Community as documented by the Natural Heritage and Endangered Species Program in its database; or (3) have an adverse impact on the wildlife habitat of any state Wildlife Management Area.

33. According to mapping available from the MassGIS MassMapper database, there are no endangered, threatened, or special concern species mapped on the Site. This is consistent with the determination issued by the Natural Heritage and Endangered Species Program (NHESP) of the Massachusetts Division of Fisheries & Wildlife in response to an inquiry made on behalf of the Project Proponents during the MEPA process and reconfirmed most recently by the NHESP in its determination letter dated December 22, 2025 (copy attached hereto as **Exhibit C**). Based on this determination, the proposed facility would not have an adverse impact on an Ecologically Significant Natural Community.

34. With respect to Wildlife Management Areas ("WMA"), the nearest such area to the Site is the Flagg Swamp WMA. Flagg Swamp is located in Marlborough, approximately 3 miles southwest of the Site. As such, the proposed facility would not have an adverse impact on the wildlife habitat of any state Wildlife Management Areas.

310 CMR 16.40(4)(d)
Areas of Critical Environmental Concern

No site shall be determined to be suitable or be assigned as a solid waste management facility where such siting: (1) would be located within an Area of Critical Environmental Concern (ACEC), as designated by the Secretary of the Executive Office of Environmental Affairs; or (2) would fail to protect the outstanding resources of an ACEC as identified in the Secretary's designation if the solid waste management facility is to be located outside, but adjacent to the ACEC.

35. The Site is not located within an Area of Critical Environmental Concern ("ACEC"), nor is it located adjacent to an ACEC. The nearest ACEC is the Central Nashua River Valley ACEC, located approximately 6.5 miles northwest of the Site in the towns of Bolton, Harvard, Lancaster, and Leominster. Accordingly, the proposed Project does not present a potential adverse impact on this or other ACECs.

310 CMR 16.40(4)(e)
Protection of Open Space

No site shall be determined to be suitable or be assigned as a solid waste management facility where such siting would have an adverse impact on the physical environment of, or on the use and enjoyment of: (1) state forests; (2) state or municipal parklands or conservation land, or other open space held for natural resource purposes in accordance with Article 97 of the Massachusetts Constitution; (3) MDC reservations; (4) lands with conservation, preservation, agricultural, or watershed protection restrictions approved by the Secretary of the Executive Office of Environmental Affairs; or (5) conservation land owned by private non-profit land conservation organizations and open to the public.

36. **State Forests.** SHA reviewed the Department of Conservation and Recreation ("DCR") website and the MassGIS MassMapper database for information regarding state forests and parklands. No state forests are located within a half mile of the Site property boundary. The closest state forest is the Marlborough-Sudbury State Forest, located in Hudson off White Pond Road, approximately 2 miles east/southeast of the Site. Due to the absence of

state forests within a half mile of the Site, it is my opinion that the proposed new transfer station will not have an adverse impact on these lands.

37. **State or Municipal Parklands.** Callahan State Park, located predominantly in Marlborough and Framingham, is the closest state park to the Site. At its northernmost limits in Marlborough, the park is approximately 4.3 miles southeast of the Site. Municipal parks in Hudson, listed as such on the Town's Division of Recreation web page, include Cellucci Park, Hudson Skate Park, Lamson Park at Tripps Pond, Liberty Park, and Wood Park. All five parks are located near the Town center. The closest of these parks to the Site is Cellucci Park, located approximately 1.2 miles west/southwest of the Site. In addition to the municipal parks, municipal fields were also identified using information available on the Hudson Division of Recreation web page. The closest field is the Cherry Street Field located approximately 0.7 miles west/southwest of the Site. The location of Cherry Street Field is shown on Figure 1. There are no municipal parks located within a half mile of the Site. Due to the proposed facility's distance from state and municipal parklands, it is my opinion that the proposed new transfer station will not have an adverse impact on these lands.

38. **DCR Reservations.** SHA reviewed the DCR website for information regarding reservations, including reservations formerly under the authority of the Metropolitan District Commission ("MDC"), which merged in 2004 with the former Department of Environmental Management to form the DCR. The DCR is the successor agency responsible for state-owned urban parks and recreation areas ("MDC Reservations") in Boston and surrounding communities that had formerly been under the authority of the MDC. Due to the absence of DCR land within a half mile of the Site, it is my opinion that the proposed new transfer station will not have an adverse impact on these lands.

39. **Publicly Owned Conservation Land.** Based on mapping available from MassMapper, there are two Town of Hudson publicly owned areas of conservation land located within a half mile of the Site. The closest is the Albertini/Meers Conservation Area located off Wilkins Street immediately east of the Riverside Gun Club property. At its closest point, the conservation area is approximately 600 feet east of the Site's eastern property line. The other conservation area within a half mile of the Site is the Old North Road Conservation Area, located between Old North Road and Main Street. At its closest point, this conservation area is approximately 2,100 feet south of the Site. The locations of the two publicly owned conservation areas are shown on the Half-Mile Land Use Plan (Figure 1). Due to the proposed facility's distance from these two municipal conservation areas, it is my opinion that the proposed new transfer station will not have an adverse impact on these lands.

40. **Privately Owned Conservation Land Open to the Public.** Based on mapping available from MassMapper, there are two privately owned areas of conservation land located within a half mile of the Site. One is the Kalousdian Wildlife Sanctuary located in Stow on the Hudson/Stow Town line off Hudson Road. This land, located approximately 2,100 feet north of the Site, is owned by the Stow Conservation Trust. The other privately owned conservation area is the Forest Avenue Conservation Area, located off Forest Street in Hudson. At its northernmost limit, this conservation area is approximately 1,800 feet south

of the Site. The Forest Avenue Conservation Area is owned by the Sudbury Valley Trustees ("SVT"). A review of the SVT website did not return any information on the area, such as parking and walking trail information. On this basis, I presumed that the Forest Avenue Conservation Area is not open to the public. The locations of the two privately owned conservation areas are shown on Figure 1. Due to the proposed facility's distance from these two privately owned conservation areas, it is my opinion that the proposed new transfer station will not have an adverse impact on these lands.

41. **EOEA Restricted Land.** SHA did not identify any lands with known conservation, preservation, agricultural, or watershed protection restrictions approved by the Secretary of the EEA (formerly EOEA) within a half mile of the Site. However, the Town of Hudson does have a Watershed Protection District ("WPD") established under its local zoning by-laws. The WPD is an overlay district in which specific uses are permitted under the by-laws on land within the overlay district. The WPD is located on the eastern side of Town and does not include the Site. The westernmost boundary of the WPD overlay district is shown on the Half-Mile Water Resources Plan, provided as Figure 2. Due to the absence of EEA restricted land within a half mile of the Site and the location of the proposed facility outside of the Town of Hudson Watershed Protection District, it is my opinion that the proposed new transfer station will not have an adverse impact on these lands.

310 CMR 16.40(4)(f)
Potential Air Quality Impacts

No site shall be determined to be suitable or be assigned as a solid waste management facility where the anticipated emissions from the facility would not meet required state and federal air quality standards or criteria or would otherwise constitute a danger to the public health, safety or the environment, taking into consideration: (1) the concentration and dispersion of emissions; (2) the number and proximity of sensitive receptors; and (3) the attainment status of the area.

42. Epsilon analyzed the proposed project's potential air quality impacts during the MEPA process. The potential air quality impacts are the subject of the Pre-Filed Testimony of A.J. Jablonowski, P.E. It is Mr. Jablownoski's opinion that the Site as modified by the proposed minor modification will not exceed required state and federal air quality standards or otherwise constitute a danger to the public health, safety, or the environment.

310 CMR 16.40(4)(g)
Potential for the Creation of Nuisances

Potential for the Creation of Nuisances. No site shall be determined to be suitable or be assigned as a solid waste management facility where the establishment or operation of the facility would result in nuisance conditions which would constitute a danger to the public health, safety or the environment taking into consideration the following factors: (1) noise; (2) litter; (3) vermin such as rodents and insects; (4) odors; (5) bird hazards to air traffic; and (6) other nuisance problems.

1. Noise

43. Noise control for the proposed facility was first described in Section 8.4.2.2 of the DEIR. More recently, Epsilon performed a Sound Level Study, dated September 22, 2025, in

support of the filing of the Request for Minor Modification. The potential for the creation of nuisance noise is the subject of the Pre-Filed Testimony of A.J. Jablonowski, P.E, and the Pre-Filed Testimony of Laurie Morrill, both of Epsilon. It is Mr. Jablownoski's and Ms. Morrill's opinions that the Site as modified by the proposed minor modification will not cause a nuisance noise condition which would constitute a danger to the public health, safety, or the environment.

2. Litter

44. Litter control at the new facility will be carried out using procedures currently employed at the existing transfer station. Material delivered to the new facility will be confined to the interior of the transfer station building and areas of the Site dedicated to residential drop-off activities. All commercial loads delivered to the Site will be required to be covered and vehicles transporting material from the Site will be required to be covered prior to leaving the facility. Laborers will be responsible for the maintenance of the Site, including collection of any windblown litter.

45. Employees will inspect the new facility daily for material which could be dispersed due to wind conditions. If materials are found, they will be picked up for disposal or recycling. To reduce the potential for windblown litter and material dispersion, all containers subject to windy conditions will be properly covered and/or otherwise contained to the extent practicable. Routine sweeping of roadways will also assist with litter control. In addition, security fencing installed around the perimeter of the facility will help confine windblown litter on-site and facilitate its collection.

46. All areas of the proposed facility including the building, the Residential Drop-off Area, and along the access road will be inspected for litter and windblown material on a daily basis. Should litter and/or other windblown materials be encountered, including in areas along the perimeter fencing, it will be picked up during the daily cleanup activities.

47. It is my opinion that the Site as modified by the proposed minor modification will not cause a nuisance litter condition which would constitute a danger to the public health, safety, or the environment.

3. Vectors

48. C&D debris consists of non-putrescible materials which are not a food source that attracts vectors. MSW on the other hand can provide a food source that may attract vectors such as rodents, insects, and birds. The best management practices ("BMPs") aimed at maintaining odor control, such as the transfer of waste on a "first-in, first-out" basis and keeping the waste moving through the facility, will aid in vector control. A vector control program, conducted by a professional exterminating service, will also be in-place at the proposed facility. The exterminating service will conduct routine inspections, set and collect trap stations, and advise B-P on housekeeping activities aimed at improving vector control as needed.

49. It is my opinion that the Site as modified by the proposed minor modification will not cause a nuisance vector condition which would constitute a danger to the public health, safety, or the environment.

4. Odor and Dust Control

50. Odor and dust control measures were first described in Section 8.4.2.2 of the DEIR with updated information included in Section 3.4.1 of the FEIR regarding the proposed odor and dust control misting system. Additionally, Epsilon prepared an Odor Analysis Report dated September 22, 2025, in support of the filing of the Request for Minor Modification which expanded on the odor control BMPs that B-P will implement when the new facility begins operating. The potential for the creation of nuisance odors is the subject of the Pre-Filed Testimony of A.J. Jablonowski, P.E. It is Mr. Jablownoski's opinion that the Site as modified by the proposed minor modification will not cause a nuisance odor condition which would constitute a danger to the public health, safety, or the environment.

51. As presented in the Odor Analysis Report, a dust control and odor control misting system will be installed in the proposed transfer station building. The system will consist of wall-mounted fog cannons that operate using a combined air/water mix to produce the misting spray. A total of three fog cannons are proposed that will provide odor and dust control coverage for the MSW and C&D tipping floor and trailer pit areas. Two fog cannons will be located above the overhead doors that provide access onto the tipping floor and a third will be installed in the northwest corner of the building, providing both tipping floor coverage and coverage at the two trailer pits. The fog cannons, which can be operated in both stationary and oscillating mode, will be connected to a central pump/deodorizer/control station via high pressure hydraulic piping.

52. The proposed facility will exercise dust and odor control mitigation measures as summarized below:

<u>Dust Control</u>

- Maintain paved vehicle traffic areas, including sweeping of these areas on a routine basis;
- Wet paved surfaces as necessary;
- Post signage regarding requirements for covering (tarping) of loads until inspection at the scale house;
- Provide verbal commands at the scale house;
- Handle all solid waste, including C&D materials, within the building; and
- Use the dust control water misting system in the C&D portion of the building.

<u>Odor Control</u>

- Handle commercial MSW loads within the building (residential MSW drop-off will be performed in the Residential Drop-off Area at the stationary compactors, which themselves will provide odor control through the fully enclosed containment of the residential MSW waste stream);

- Design, operate, and maintain the building's ventilation system to account for considerations such as odor and dust control, as well as management of emissions from mobile equipment operating on the tipping floor;
- Clean the tipping floors and travel ways regularly with a street sweeper and hoses, and clean the floor drains to prevent residue buildup;
- Employ a "first-in, first-out" policy for waste received at the facility, which will reduce the potential for odors to accumulate in the building;
- As an exception to the "first-in, first-out" waste transfer policy, odorous waste loads will take priority when loading trailers for off-site material disposal; and
- Use the MSW odor control misting system, which will contain odor control agents.

53. Further, inspection rounds will be completed regularly and operational data, including security video footage, will be recorded and maintained. Additionally, a hotline will be established to receive details from neighbors about any odor issues that arise. The collected information will be used to determine the cause of any odors so that appropriate solutions may be implemented.

54. It is my opinion that the Site as modified by the proposed minor modification will not cause a nuisance dust condition which would constitute a danger to the public health, safety, or the environment.

5. Bird Hazard to Air Traffic

55. The nearest airport to the Site is the Minute Man Air Field in Stow, located approximately 4.3 miles north of the Site. The airport is a small, privately owned public-use airport. The closest airport offering commercial air service is Hanscom Field in Bedford, Massachusetts. Hanscom Field is located approximately 13.5 miles east/northeast of the Site. Operating experience to date has shown that birds are not attracted to the existing transfer station located at the Site. Based on this, in combination with the remote distance of nearby airports, it is my opinion that the Site as modified by the proposed minor modification will not pose a hazard to air traffic.

6. Other Nuisance Conditions

56. It is my opinion that other nuisance conditions are not likely to exist in connection with the proposed facility.

310 CMR 16.40(4)(h)
Size of Facility

No site shall be determined to be suitable or be assigned as a solid waste management facility if the size of the proposed site is insufficient to properly operate and maintain the proposed facility. The minimum distance between the waste handling area or deposition area and the property boundary shall be 100 feet, provided that a shorter distance may be suitable for that portion of the waste handling or deposition area which borders a separate solid waste management facility.

57. The Site is sufficiently sized to properly operate and maintain the proposed transfer station facility. As described in the site and building layout narratives provided in Chapter 8 of the

DEIR and Chapter 3 of the FEIR, the proposed facility consists of a nearly 2,000-foot access road that leads to the proposed Transfer Station & Recycling Building, as well as site support areas located near the building. The most significant of these nearby support areas is the approximately 1.3-acre Residential Drop-off Area ("RDOA"), reserved for Hudson residents dropping off MSW and recyclables at the facility. The remaining operational areas consist of the inbound and outbound weigh scale area, located approximately 300 feet west of the proposed building, and the perimeter roadway that surrounds the building and encompasses areas for temporary semi-trailer storage. In total, the approximate area within which the entirety of the proposed facility will be located (access road; proposed building area; RDOA; perimeter roadway area; weigh scale and trailer storage areas; and stormwater management areas) will encompass approximately 12.9 acres of the 72.4-acre Site. The primary elements of the proposed facility layout are depicted on Figure 3.

58. Site access and vehicle circulation for the proposed facility is described in Section 8.1.1 of the DEIR, which includes several figures showing proposed vehicle circulation paths for residents and commercial customers visiting the facility, as well as semi-trailer circulation paths and temporary storage areas. The site layout and vehicle circulation was developed to allow the RDOA to function as an independent operational node that will allow residents to access and use the area without intermixing with commercial vehicles visiting the facility. The site layout, inclusive of the access road which extends approximately 1,450 feet from its intersection with Cox Street to the weigh scale and RDOA, provides more than adequate capacity to accommodate, on-site, vehicles entering and exiting the facility.

59. With respect to the proposed building itself, Section 8.2 of the DEIR summarizes the individual operational areas that comprise the 53,000 square foot building. These individual building operational areas are summarized in Table 8-1 of the DEIR and reiterated below for reference.

Transfer Station & Recycling Building Approximate Square Footage Per Operational Area

Operational Area	Approximate Square Footage		
MSW and C&D Area:		32,835	
• MSW Tipping Floor	17,800		
• C&D Tipping Floor	12,935		
• MSW Trailer Pit	1,050		
• C&D Trailer Pit	1,050		
Recyclables Processing Area		18,165	
Total Material Handling Portion of Building (MSW, C&D, and Recycling Operational Area)		51,000	51,000
Office/Administration Space			2,000
Total Transfer Station & Recycling Building Area			53,000

60. Sections 8.2.1 through 8.2.4 of the DEIR describe the MSW and C&D operating areas and how operations will be performed in these areas. Section 8.2.4 of the DEIR describes how

operations will be performed in the recyclables processing portion of the new building. An expanded discussion of the material handling capacity of the proposed Transfer Station & Recycling Building is presented in Chapter 3 of the FEIR. This expanded discussion was prepared in response to MassDEP comments requesting additional information demonstrating that the proposed building is sufficiently sized to support the expected volume of materials to be received. To this end, Section 3.2.1 of the FEIR presents a detailed discussion of the MSW and C&D handling capacity of the facility, which includes material handling rates and tipping floor storage capacity associated with the facility operating at its proposed permitted capacity of 850 TPD. As presented in the FEIR, based on the evaluation of the facility's MSW and C&D throughput rate, as well as the operational floor storage capacity provided for these materials, the waste handling area of the proposed Transfer Station & Recycling Building is appropriately sized to accept MSW and C&D at the sought-after permitted capacity of 850 TPD.

61. Section 3.2.2 of the FEIR provides a detailed analysis of the recyclables handling capacity of the proposed building. The analysis includes material storage capacity of the Recyclables Processing portion of the building, which includes pre-baling material storage capacity, bale production throughput rates for the various recyclable materials received, estimated number of bales produced on a daily and weekly basis, and bale storage capacity provided at the building. As concluded in the FEIR, based on the capacity evaluation for: (1) the storage of incoming recyclable materials; (2) the sorting and baling line run times for these materials; and (3) the associated bale storage needs, the Recyclables Processing Area is appropriately sized and equipped to accept recyclable materials for both the current (start-up) condition of 22 TPD (5,800 TPY) and future growth condition of 77 TPD (20,000 TPY). Even though not subject to the minor modification requested, the recyclables handling activities will be co-located at the proposed facility. It is my opinion that the proposed facility will have sufficient size to accommodate these activities as well as the MSW and C&D waste handling activities.

62. Based on the foregoing, the proposed site layout and building areas are sufficiently sized to properly operate and maintain the proposed new facility. Furthermore, pursuant to the requirements of 310 CMR 16.40(4)(h), the proposed building location meets the minimum 100-foot distance between the waste handling area and the Site property boundary (Figure 3 depicts the 100-foot property line interior offset buffer). The closest the new building's waste handling area comes to the property line is at the eastern side of the building, located approximately 135 feet from the Site's eastern property line. Accordingly, the facility is sufficiently sized and appropriately offset from the Site property line for the proposed site assignment modification.

310 CMR 16.40(4)(i)
Areas Previously Used for Solid Waste Disposal

Where an area adjacent to the site of a proposed facility has been previously used for solid waste disposal the following factors shall be considered by the Department in determining whether a site is suitable and by the board of health in determining whether to assign a site: (1) the nature and extent to which the prior solid waste activities on the adjacent site currently adversely impact or threaten to adversely impact the proposed site; (2) the nature and extent to which the proposed

site may impact the site previously used for solid waste disposal; and (3) the nature and extent to which the combined impacts of the proposed site and the previously used adjacent site adversely impact on the public health, safety and the environment; taking into consideration: (a) whether the proposed site is an expansion of or constitutes beneficial integration of the solid waste activities with the adjacent site; (b) whether the proposed facility is related to the closure and/or remedial activities at the adjacent site; and (c) the extent to which the design and operation of the proposed facility will mitigate existing or potential impacts from the adjacent site.

63. The former Hudson-Stow Landfill, owned by Waste Management, Incorporated, is located on property that partially abuts the northerly bank of the Assabet River and is approximately 150 feet north of the Site property at its closest distance (Figure 1). Based on information available from the MassDEP solid waste facility database for inactive and closed landfills (document titled Inactive & Closed Landfills & Dumping Grounds, dated July 2025), the landfill is 11 acres in size, is lined, began accepting solid waste in 1979, and was capped in 1997. The land consists of two abutting properties both of which are owned by Waste Management: a 46.6-acre parcel located in Hudson on which the capped landfill is located and a 40.3-acre parcel located in Stow. A further online search for current information regarding the landfill revealed that a solar array was constructed on 28 acres of the site in 2017 with a portion of the array located on the landfill plateau.

64. With respect to the siting criterion, the capped landfill site does not directly border the Site because the Assabet River provides a dividing physical feature that separates a portion of the two properties. Additionally, there is no historic ownership or operational connection between the capped landfill site and the operations performed at the Site. Furthermore, the siting of the proposed transfer station is unrelated to the past use of the privately owned landfill.

65. As a closed and capped facility, the former landfill does not adversely impact or threaten to adversely impact the siting of the proposed transfer station facility, nor does the siting of the proposed transfer station present an impact to the capped landfill site. Consequently, there are no combined impacts of the proposed facility siting and the former Hudson-Stow Landfill site that would adversely impact public health, safety, and the environment.

310 CMR 16.40(4)(j)
Existing Disposal Facilities

In evaluating proposed sites for new solid waste management facilities the Department and the board of health shall give preferential consideration to sites located in municipalities in which no existing landfill or solid waste combustion facilities are located. This preference shall be applied only to new facilities which will not be for the exclusive use of the municipality in which the site is located. The Department and the board of health shall weigh such preference against the following considerations when the proposed site is located in a community with an existing disposal facility: (1) the extent to which the municipality's or region's solid waste needs will be met by the proposed facility; and (2) the extent to which the proposed facility incorporates recycling, composting or waste diversion activities.

66. There are no active landfill or solid waste combustion facilities located in Hudson. The nearest active landfill is the Fitchburg-Westminster Landfill in Westminster, Massachusetts, located approximately 18 miles northwest of the Site. The nearest waste combustion facility is the WIN Waste facility in Millbury, Massachusetts, located approximately 16.8 miles southwest of the Site. As is the case with the existing transfer station at the Site, the proposed facility will not be for the exclusive use of the Town of Hudson, although it will provide continued solid waste transfer and recycling services to the Town once operations at the existing transfer station have ceased. Based on these conditions, this siting criterion states that preferential consideration should be given to the Site in determining its suitability for site assignment. Since the Site is already site assigned, preferential consideration is sought by the applicants as may be appropriate in connection with the Request for Minor Modification.

67. It is appropriate to note that the Town's and region's solid waste needs will be further supported by the increased capacity provided by the proposed facility. Additionally, the proposed facility will incorporate expanded recycling and waste diversion activities referenced in this siting criterion. The ability of the facility to support solid waste management needs in the area, as well as achieve expanded recycling and waste diversion objectives, is presented in Section 8.6 of the DEIR (Master Plan Compliance) and reiterated below.

68. As acknowledged in MassDEP's 2030 Solid Waste Master Plan, solid waste disposal options and disposal capacity in Massachusetts and throughout the northeast are increasingly limited, with landfill capacity in Massachusetts projected to decline to "virtually zero" by 2030. For this reason, and to realize other environmental and economic benefits, the core objective of the Master Plan is to put into place systems that will help Massachusetts reduce the amount of waste requiring disposal so that it can achieve the 30% and 90% reduction targets set for 2030 and 2050, respectively.

69. The proposed Hudson Transfer Station and Recycling Facility will support the objectives of the Master Plan in several key areas:

    (a) The Recyclables Processing Area of the building will provide added materials recovery capacity to the state's MRF infrastructure, which, as noted in the Master Plan, is operating at nearly 100 percent of capacity. Additionally, the Recyclables Processing Area will help support recovery of waste ban materials from the MSW operations, where uncontaminated banned materials that may be safely removed from incoming MSW loads (for example, cardboard) can be delivered to the Recyclables Processing Area for recovery.

    (b) Increased recycling by Hudson residents visiting the facility will be promoted by the expanded and self-contained layout of the Residential Drop-off Area, which will prioritize recycling as a "front-end" drop-off activity.

    (c) The tipping floor for C&D operations will encompass an area of approximately 13,000 square feet, which is over four times the floor area provided for C&D operations at the existing transfer station. The additional floor area, as well as a dedicated trailer pit for

receipt of C&D material, will not only accommodate the receipt of a greater quantity of C&D material at the facility, it will also provide needed floor area to conduct C&D operations that incorporate the requirements of MassDEP's Minimum Performance Standard ("MPS") guidance policy for handling C&D materials (inspection of incoming loads, removal of clean gypsum wallboard, and removal of zero tolerance waste ban items) into the building's physical space. As the requirements of the MPS evolve to support the waste reduction objectives of the Solid Waste Master Plan, the proposed facility will have the operational space to adapt to both existing and future MPS-related operational requirements.

(d) The MSW operations of the proposed facility will offer similar benefits in support of the Master Plan as the C&D operations will provide. The tipping floor for MSW operations will encompass an area of approximately 17,800 square feet, which is almost six times the floor area provided for MSW operations at the existing transfer station. As with the proposed C&D operational space, the MSW operational space will provide expanded floor area to conduct load inspections and segregate banned materials from the incoming waste stream. As the waste bans evolve in support of the waste reduction objectives of the Master Plan, the proposed facility will have the operational space to adapt to increased material management and diversion needs associated with both existing and future waste ban requirements.

70. As itemized above, the proposed facility will greatly enhance waste reduction, diversion, and material recovery capabilities at the Site while providing an additional outlet for the efficient management of these materials as in-state disposal capacity continues to diminish. In this way, the proposed facility, with its increased capacity to receive MSW and C&D debris, together with its focus on materials recovery, will provide added resiliency to Massachusetts' waste disposal infrastructure in and around the Town of Hudson. For these reasons, the proposed Hudson Transfer Station and Recycling Facility is fully aligned with the objectives of the 2030 Solid Waste Master Plan and will have the flexibility to support the plan's initiatives well into the future.

310 CMR 16.40(4)(k)
Consideration of Other Sources of Contamination

The determination of whether a site is suitable and should be assigned as a solid waste management facility shall consider whether the projected impacts of the proposed facility pose a threat to public health, safety or the environment, taking into consideration the impacts of existing sources of pollution or contamination as defined by the Department, and whether the proposed facility will mitigate or reduce those sources of pollution or contamination.

71. The design and operation of the proposed facility include environmental controls for noise, odor, and other nuisance conditions, as described in other pre-filed testimony submitted in support of the Request for Minor Modification. These controls, and the supporting studies and design concepts presented in the MEPA documents (DEIR and FEIR), as well as the supplemental odor and noise studies, confirm that the proposed facility does not pose a threat to public health, safety. or the environment.

72. With respect to existing contamination at the Site and whether the proposed facility might mitigate any such contamination, this is a consideration not applicable to the Project as there is no existing source of contamination on the Site. To confirm this, SHA conducted a search of MassDEP's online data portal for Waste Site & Reportable Releases to determine whether there were any reportable releases of oil and hazardous materials at the Site. The data portal identified one release had occurred on the property at 1 Municipal Drive (Release Tracking Number 2-0022344) in June 2023. The release was estimated at 250 gallons of ferric chloride that had leaked from a temporary holding tank into soil outside of the Tertiary Building Chemical Room at the Hudson Wastewater Treatment Facility. The release was addressed and subsequently closed with a Permanent Solution Without Conditions ("PSNC") in November 2023, pursuant to the provisions of the Massachusetts Contingency Plan. The PSNC is documented in the Immediate Response Action Completion Report prepared by TERRA Environmental of Reading, Massachusetts.

73. SHA reviewed the PSNC to identify the nature of the release and its location relative to the proposed transfer station project area. Based on our review of the PSNC, the release occurred at the exterior of the eastern side of the Tertiary Building Chemical Room, approximately 360 feet north of the closest portion of the proposed transfer station development area. The release of the ferric chloride led to the excavation of soil over an area of approximately 5 feet by 45 feet to a maximum depth of 18 inches. The impacted soil was removed from the Site and transported to Stablex in Canada for disposal.

74. As documented in the PSNC, the immediate response actions performed at the time of the release led to TERRA's conclusion that the IRA was complete and a Condition of No Significant Risk of harm to human health, public safety and welfare, and the environment had been achieved, consequently a permanent solution to the release had been achieved.

75. Because the former release is outside of the proposed limit of work for the proposed transfer station project and a permanent solution to the ferric chloride release has been achieved, in my opinion this former release does not present a potential source of contamination at the Site that is relevant to the siting criterion contemplated hereunder.

310 CMR 16.40(4)(l)
Regional Participation

The Department and the board of health shall give preferential consideration to sites located in municipalities not already participating in a regional disposal facility. The Department and the board of health shall weigh such preference against the following considerations when the proposed site is located in a community participating in a regional disposal facility: (1) the extent to which the proposed facility meets the municipality's and the region's solid waste management needs; and (2) the extent to which the proposed facility incorporates recycling, composting, or waste diversion activities.

76. The Town of Hudson does not currently participate in any regional disposal facility. Further, as discussed above in connection with the siting criterion set forth in 310 CMR 16.40(4)(j), the Town's and region's solid waste needs will be further supported by the

increased capacity provided by the proposed facility, and the proposed facility will incorporate expanded recycling and waste diversion activities. Based on these conditions, this siting criterion states that preferential consideration should be given to the Site in determining its suitability for site assignment. Since the Site is already site assigned, preferential consideration is sought by the applicants as may be appropriate in connection with the Request for Minor Modification.

77. It is my professional opinion that the Site as modified by the proposed minor modification complies with all applicable site suitability criteria set forth in 310 CMR 16.40(3)(d) and 16.40(4) and will not constitute a danger to the public health, safety, or the environment.

Signed under the pains and penalties of perjury this 30th day of January, 2026.

Signed by:
Stephen E. Wright
48129E9B5EAA4E1...
Stephen E. Wright, P.E.

CERTIFICATION PURSUANT TO 310 CMR 16.07

Pursuant to 310 CMR 16.07, I, Stephen E. Wright, hereby state that I have no legal interest in the proposed site and certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties both civil and criminal for submitting false information including possible fines and imprisonment.

Signed by:
Stephen E. Wright
48129E9B5EAA4E1...
Stephen E. Wright, P.E.
Sanborn, Head & Associates, Inc.

Dated: January 30, 2026

EXHIBIT A

STEPHEN E. WRIGHT, PE
Principal Engineer – Senior Vice President

KEY AREAS OF PRACTICE

Transfer Station Design and Operations

Landfill Design, Assessment & Closure

Solid Waste Management Planning & Permitting

Construction Management

EDUCATION

MS, Civil Engineering, Northeastern University, Boston, MA

BS, Civil Engineering, University of Massachusetts, Amherst, MA

REGISTRATIONS / CERTIFICATIONS

Professional Engineer – MA, NH

PROFESSIONAL AFFILIATIONS

Solid Waste Association of North America

Environmental Business Council, Solid Waste Management Committee

Stephen Wright is a Principal Engineer and Senior Vice President at Sanborn Head and Associates, a 175-person civil/environmental engineering firm headquartered in Bedford, New Hampshire. Mr. Wright has over 35 years of experience on a wide range of solid waste design, permitting, and construction projects. His work spans landfill design, environmental assessments, and closures; transfer station, processing facility, and materials recovery facility design and operations; and solid waste management planning. He is skilled at managing multi-disciplinary projects from the concept planning and feasibility phase, through design, permitting, bidding, and construction.

REPRESENTATIVE PROJECTS

Brewster Transfer Station and Sanitary Landfill, Brewster, MA

Prepared a facility improvements feasibility study that compares options for modifying the Town's solid waste, recycling, and DPW operations to provide expanded capacity and accessibility to the various solid waste and recycling nodes, improve operational efficiency, and minimize pedestrian/vehicle conflicts. Reviewed several years of the facility's solid waste and recycling data to assess trends, interpreted traffic count data, and prepared several site layout alternatives in close coordination with the DPW.

ReSource Ware C&D Rail Transfer Station, Ware, MA

Led the planning and permitting effort to increase the facility's permitted capacity from 750 tons per day to 1,400 tons per day. Managed preparation of the Massachusetts Environmental Policy Act (MEPA) filing, which included the preparation of traffic, air quality, and noise studies, as well as an enhanced analysis to interpret impacts to EJ communities. Prepared MassDEP site suitability application, which included an extensive analysis of the site layout and transfer station operations to demonstrate that the facility could support the capacity increase. Led the Board of Health site assignment modification process, successfully navigating the project through the public hearing process and receipt of the site assignment modification.

National Waste and Recycling Association, Solid Waste Transport Study

Evaluated implications of Massachusetts tractor trailer waste transport weight limits and how an increase in these limits could mitigate the impacts of out-of-state waste disposal stemming from ever-diminishing in-state disposal capacity. Researched current solid waste and recycling market trends nationally and in the northeast and evaluated recent Massachusetts disposal data in comparison to disposal capacity to predict future export demands and destination locations.

Southbridge Recycling & Disposal Park, Southbridge, MA

Managed the operations, expansion, environmental assessment, and phased closure activities at this regional solid waste landfill. Led landfill master planning efforts related to the horizontal and vertical expansion of the landfill, as well as infrastructure support consisting of new leachate storage tanks, utilities, landfill gas treatment, flaring, and landfill-gas-to-energy generators. Managed the design and construction administration for capping the remaining 27 acres of the 54-acre landfill, as well as the final environmental assessment program that established the final post-closure maintenance and monitoring program for the facility.

Wellesley Recycling and Disposal Facility, Wellesley, MA

Served as lead design engineer and project manager for the design, permitting and construction administration for extensive upgrades to the town's Recycling and Disposal Facility (RDF) transfer station and recycling operations. Led the civil/site and solid waste design effort, including site layout, solid waste handling equipment and recycling equipment selection, and selective demolition design and re-purposing of an abandoned incinerator building for conversion to a materials recovery facility. Led the multi-disciplinary team of architects, structural, electrical and mechanical engineers for building improvements and managed environmental assessment activities as design was proceeding.

Yarmouth/Barnstable Rail Transfer Station, Yarmouth, MA

Served as lead design engineer and manager for the construction phase of this 500 ton per day regional rail-haul transfer station. Was responsible for all aspects of construction administration, including schedule management, reviewing progress of work, leading construction meetings, approving payment requisitions, and punch list generation and project closeout activities.

ReSource Epping Transfer Station and C&D Processing Facility, Epping, NH

Led the permitting and construction administration/construction quality control services for the addition of a 13,000 square foot canopy-covered soils solidification pad, which accepts impacted soils and sediments in need of dewatering before transport for disposal. Served as Principal-in-Charge in connection with the NHDES Type II Permit Modification and Notice of Intent (NOI) to Operate. Currently leading the permitting and design effort for the construction of a new 750 ton per day solid waste transfer station at the site. Developed concept plans for the building operations and site layout and is Principal-in-Charge for the permitting and design phases of the project.

New Bedford Transfer Station, New Bedford, MA

Managed the design, permitting and construction administration phases for this 300 ton per day solid waste transfer station. Led the civil/site design effort, developed building layout concepts, and managed the architectural and building services design effort, which included features that allow the facility to be converted to a rail haul transfer station.

Transfer Station & Recycling Facility, Derry, NH

Led the planning and conceptual design effort for the improvements to the existing transfer station and recycling facility. Served as lead engineer for the traffic evaluation, solid waste and recycling data review and projections, facility sizing, baler equipment evaluation, and preparation of several alternative conceptual layout plans.

ReSource Roxbury C&D Processing Facility, Boston, MA

Managed the permitting effort for the addition of an eddy current separator into the facility's 2-inch to 5-inch processing line. Led the preparation of the permit application and drawings depicting modifications to the facility for the installation of the eddy current separator, including conveyor systems that direct the removed metals to an exterior storage location. Also led the permitting effort in support of a 49 TPD capacity increase.

Bristol Resource Recovery Facility, Waste Diversion Contingency Planning, Bristol, CT

Developed waste diversion options and implementation recommendations to address possible short- and long-term interruptions in service at the waste-to-energy facility. Visited satellite transfer stations that deliver waste to the combustion facility and developed concept plans for these satellite facilities that would provide expanded capacity and an alternative waste distribution network in the event of a shutdown at the BRRF.

Transfer Station and Recycling Facility Feasibility Study, New London, NH

Managed the feasibility study for a proposed town transfer station and recycling facility. Evaluated waste and recycling tonnages, calculated future quantities to be processed, calculated loose volume storage requirements for recyclables, and determined bale production quantities and storage needs for current and future (30-year) conditions. Developed the conceptual plans for the expanded facility, including required building size, site layout and grading features, and improved vehicular and pedestrian circulation.

Site Assignment Technical Assistance, Fitchburg/Westminster Landfill, Westminster, MA

Served as technical advisor to the Westminster Board of Health, supporting the board during the site assignment process for the 50-acre lined landfill expansion of the Fitchburg/Westminster Landfill. As project manager, was responsible for reviewing all permits prepared by the applicant, including the Environmental Impact Report, Site Suitability Report, site

preparation construction drawings, and landfill design drawings, specifications and operating plans. Served as the Board of Health's technical expert in connection with peer review of the Site Assignment application, represented the Town during the public hearing process, and prepared conditions for inclusion in the final Site Assignment.

Site Assignment Technical Assistance, Everett, Massachusetts

Provided regulatory and technical assistance to the Board of Health in connection with a 500 ton per day construction and demolition debris waste handling facility. Reviewed the applicant's Site Suitability Report permit application, Supplemental Final Environmental Impact Report, and MassDEP's Report on Site Suitability. Following review of the relevant application information, prepared a report for the Board of Health identifying issues to further consider as it deliberated site suitability and represented the Board on these issues during the Public Hearing process. Following the Hearing, worked with the Hearing Officer and the Board of Health to develop the conditions that were ultimately incorporated into the Board's final site assignment decision.

Hull Sanitary Landfill, Hull, MA

Since 2000, has provided design, operations and construction support on landfill operations, closure, and post-closure activities. Led the design permitting and construction management phases for installation of a 1.8 megawatt, 330-foot tall, pile-supported wind turbine on the top of the capped portion of the landfill. Also responsible for performing MassDEP-certified third-party waste ban and O&M inspections at the landfill. Currently managing the multi-phased environmental site assessment in preparation for the final closure of the facility.

Elks Landfill Assessment and Closure, Chicopee, MA

Evaluated closure alternatives, prepared closure design plans, and provided construction management services at this privately-owned landfill. Managed a waste delineation program consisting of installation of multiple borings and gas monitoring wells on several properties surrounding the landfill resulting in the design and construction of a gas interceptor trench on one property. Assisted the client with the development of a 9-acre solar array constructed on the landfill plateau and currently managing post-closure compliance activities at the site.

Abington Sanitary Landfill, Abington, MA

Led the landfill assessment phase, including hydrogeologic investigations, wetlands investigations, and groundwater, surface water, soil and sediment sampling. Assisted the Town in identifying and acquiring portions of abutting private property impacted by the former landfill operations. Assisted the Town on identifying closure and post-closure use scenarios aimed at mitigating the cost of closure and enhancing the potential for developing the site following cap construction.

EXHIBIT B

Figure 1

Half-Mile Land Use Plan

Request for Minor Modification to Site Assignment

Hudson Transfer Station and Recycling Facility
Hudson, Massachusetts

Drawn By:	E. Wright
Designed By:	S. Wright
Reviewed By:	S. Wright
Project No:	3984.001
Date:	January 2026

Notes

1. Aerial provided by ESRI through ArcGIS Online.

2. All features shown were downloaded from MassGIS and ESRI in November of 2025.

Legend

- Site Property (Site Assigned Area)
- Parcel with Street Number
- Former Rail Line
- Public School Parcel
- Prime Farmland
- Farmland of Statewide Importance

Open Space:

- Conservation Organization (Private)
- Conservation Land Trust (Private)
- Municipal Conservation Land
- Municipal Field

Feet
400 200 0 400 800

SANBORN HEAD

Kalousdian Wildlife Sanctuary
Hudson-Stow Landfill (Closed/Capped)
Stow
Hudson
Organization for the Assabet River
Quinn Middle School Property
Proposed Transfer Station Waste Handling Area
Assabet River
500 Foot Property Line Setback
Albertini/Meers Conservation Area
Mulready Elementary School
Existing Transfer Station
Cherry Street Field
Forest Ave Elementary School
Forest Ave Conservation Area
Old North Road Conservation Area
0.5 Mile Property Line Setback

Last Edited By: ewright
Path: P:\3900s\3984.000\Graphics Files\ArcGIS\Figures\Siting Plans Minor Mod\SitingPlans_MinorMod.aprx Half Mile Land Use

Last Edited By: ewright
Path: P:\3900s\3994.00\Graphics Files\ArcGIS\Figures\Stiing Plans Minor Mod\StiingPlans_MinorMod.aprx Half Mile Water Resource

Figure 2

Half-Mile Water Resources Plan

Request for Minor Modification to Site Assignment

Hudson Transfer Station and Recycling Facility
Hudson, Massachusetts

Drawn By:	E. Wright
Designed By:	S. Wright
Reviewed By:	S. Wright
Project No:	3984.001
Date:	January 2026

Notes

1. Aerial provided by ESRI through ArcGIS Online.

2. With the exception of private drinking water well locations, all features shown were downloaded from MassGIS and ESRI in November of 2025. Private drinking water well locations are from MassDEP EEA Well Driller Data Portal in December of 2025.

3. The following areas are not located within a half-mile of the site: Zone A or Zone B of Surface Water Drinking Water Supplies.

Legend

- Site Property (Site Assigned Area)
- Parcel with Street Number
- Non-Community Groundwater Source
- Private Drinking Water Well
- Perennial Stream
- Potentially Productive Aquifer (Medium Yield in Area Shown)
- Interim Wellhead Protection Area (IWPA)
- Approved Wellhead Protection Area (Zone I)
- Approved Wellhead Protection Area (Zone II)
- 100-Year Floodplain Boundary
- Town of Hudson Watershed Protection District

MassDEP Wetlands:

- Marsh/Bog
- Wooded Marsh
- Open Water

Feet
400 200 0 400 800

SANBORN HEAD

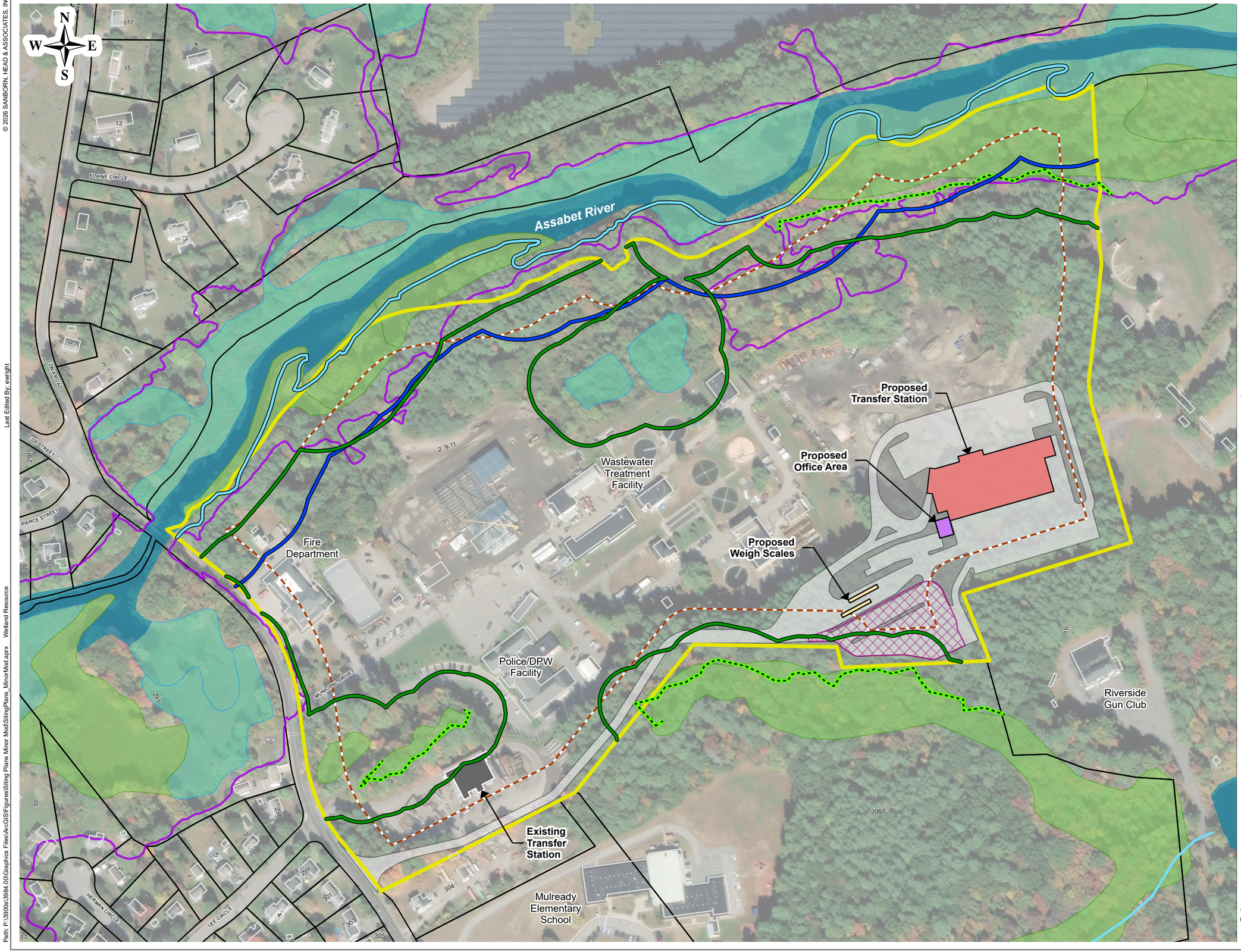


Figure 3

Wetland Resources Site Plan & On-Site Buffer Areas

Request for Minor Modification to Site Assignment

Hudson Transfer Station and Recycling Facility
Hudson, Massachusetts

Drawn By:	E. Wright
Designed By:	S. Wright
Reviewed By:	S. Wright
Project No:	3984.001
Date:	January 2026

Notes

1. Aerial provided by ESRI through ArcGIS Online.

Legend

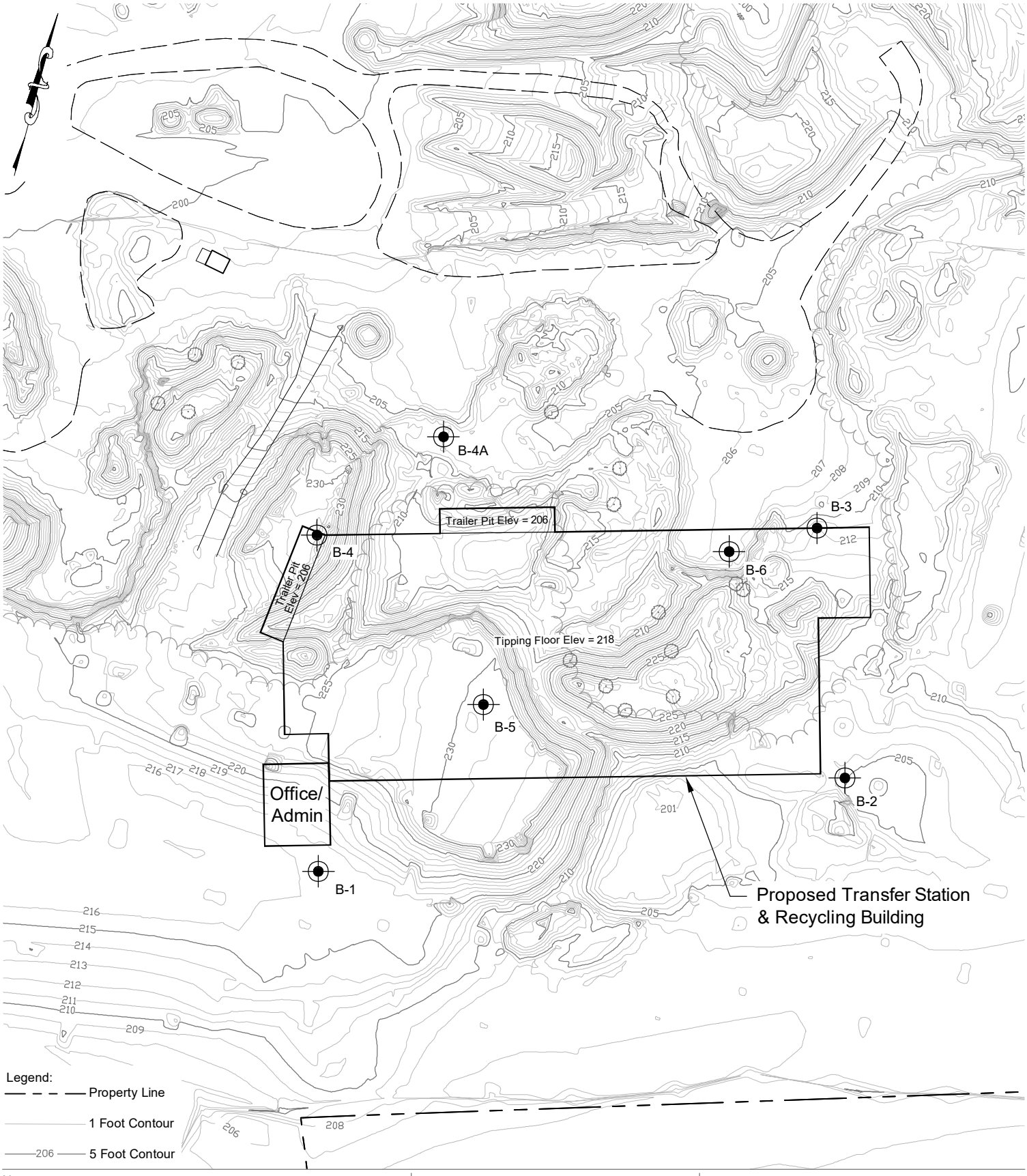
- Site Property (Site Assigned Area)
- Parcel with Street Number
- Proposed Waste Handling Area
- Proposed Office
- Proposed Scale
- Proposed Pavement Area
- Proposed Residential Drop-off Area (RDOA)
- Perennial Stream
- 100-Year Floodplain Boundary
- 100-Foot Property Line Buffer (Minimum Required Setback to Waste Handling Area)
- Delineated Wetland Boundary
- Approximate Top of Bank
- 100-ft Wetland Buffer
- 200-ft Riverfront Boundary

MassDEP Wetlands:

- Marsh/Bog
- Wooded Marsh
- Open Water

125 62.5 0 125 250 Feet

SANBORN HEAD



Notes:
1. Topographic information based on aerial imagery dated April 21, 2018, performed by Eastern Topographics of Wolfsboro, New Hampshire and an on-the-ground survey performed by Control Point Associates of Southborough, Massachusetts between 10/11/2018 and 10/22/2018. Topographic and property line survey information are depicted on an existing conditions site plan prepared by Control Point, dated 9/17/2019. Elevations refer to the North American Vertical Datum of 1988 (NAVD88). Horizontal datum is referenced to the North American Vertical Datum of 1983 (NAD83), Massachusetts State Plane Coordinate System.
2. Subsurface boring program was performed between 12/10/2018 and 12/14/2018 under the observation of Sanborn Head.

Drawn By: E. Wright
Designed By: S. Wright
Reviewed By: S. Wright
Project No: 3984.001
Date: January 2026

40' 0 80' Feet

SANBORN HEAD

Figure 4

Boring Locations in Proposed Building Area

Request for Minor Modification to Site Assignment
Hudson Transfer Station and Recycling Facility
Hudson, Massachusetts

EXHIBIT C

MASSWILDLIFE

DIVISION OF
FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

December 22, 2025

Alyssa Jacobs
Espilon Associates 3 Mill & Main Place Suite 250
Maynard, MA 01754

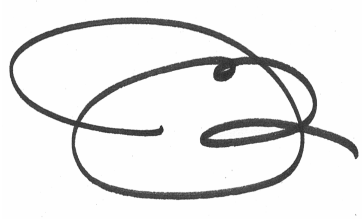
RE: Project Location: 300 Cox Street
Town: Hudson
Heritage Hub Form ID: IR-96854
NHESP Tracking No.: -

To Whom It May Concern:

Thank you for contacting the Natural Heritage and Endangered Species Program (NHESP) of the MA Division of Fisheries & Wildlife (the "Division") for information regarding state-listed rare species in the vicinity of the above referenced site. Based on the information provided, the Division has determined that at this time the site is not mapped as Priority or Estimated Habitat.

This evaluation is based on the most recent information available in the NHESP database, which is constantly being expanded and updated through ongoing research and inventory. If you have any questions regarding this letter please contact Melany Cheeseman, Endangered Species Review Assistant, at Melany.Cheeseman@mass.gov.

Sincerely,



Jesse Leddick
Assistant Director