



Green Seal Environmental, LLC

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MassDOT Certified

December 30, 2025

Neil Angus, Director/Land Use Administrator

Devens Enterprise Commission

33 Andrews Parkway

Devens, MA 01434

RE: Devens Recycling Center, LLC
Facility Concerns

Dear Neil:

Green Seal Environmental, LLC (GSE) and Devens Recycling Center, LLC (DRC) has prepared this memorandum to respond to your document that listed several concerns dated December 26, 2025. We have placed your comments below with a response to each comment.

1. **Noise impacts with doors open.** Applicants are requesting to open the doors and rail car door on the east side of the facility (closest to where noise complaints come from) at 5AM-9PM. With doors open and equipment and vehicles running, there is increased chance for noise complaints as the sound will not be contained. The concern would be 5AM-7AM and 5PM to 9PM for increased receiving times.

GSE/DRC Response: *Acknowledged. Deven's has provided a sound study and sound study addendums that shows that the facility can maintain compliance with the appropriate sound level requirements.*

2. **Operations of Doors.** Door control is critical to containing facility activities and emissions. There are 6 main doors along the east side of the building and one railcar door. Most noise complaints have come from the northeast residential areas in Ayer (Pirone Park – across Grove Pond). These complaints have been at night (after hours) when either rail cars were moving in and out of the building or a door or doors were left open (during maintenance activities or when broken). Certain doors were required to be left closed during facility operations when not in use to help minimize noise, contain dust and emissions. Are there cameras on-site that the DEC and applicant could access to monitor door operations?

GSE/DRC Response: *The facility maintains cameras that can be accessed on-site should the DEC receive a complaint. These cameras presently cannot be accessed remotely. Additionally, the Facility is upgrading their cameras in the Spring so maybe camera access will change. Please see Attachment 1 that provides general views of the on-site cameras, which includes being able to capture door activities from the interior and exterior.*

3. **Rail Car loading/movement from 9PM-12AM.** While the applicant would cease internal equipment operations when they needed to open the door to move rail cars into the building, the reality of this happening is unrealistic and would be very difficult to enforce.

GSE/DRC Response: *DRC is committed to enforcing this policy. Additionally, the facility and DEC can gain historical camara access to view doorways and processing line activities during rail movement sequencing.*

4. **Dust Control.** Misting systems are not always operational. Filters on building exhaust are critical to controlling particulate matter from escaping the facility. These, coupled with doors being left open can create nuisance conditions. The O&M Plan submitted includes a number of measures that are important to implement to reduce dust and fugitive emissions.

GSE/DRC Response: *The misting system is fully functional. During winter months when the interior is below freezing, the misting system does not run for safety purposes. However, with respect to odor, there is very limited biological activity that would create putrescible odors during the winter months. Additionally, for C&D processing, the facility will still maintain hoses that can be used to wet the C&D to control dust as needed. The facility presently has coarse filter screens on the exhaust fans. GSE and DRC acknowledge that closing doors when they are not necessary shall be a part of their day-to-day operational protocols.*

5. **Odor Control.** Extended hours means extended opportunities for odor issues. Applicant should commit to conducting odor monitoring for the first 6 months of operation to determine if additional control measures are required. The O&M Plan does not specifically address odor.

GSE/DRC Response: *The misting system is fully functional and can control odors. The applicant will commit to have a third party perform odor monitoring as recommended by the DEC.*

6. **Alternative Pest Control Methods.** The Applicant engages pest control services on a regular basis and they maintain adequate records of this. DEC Staff have raised concerns over the use of certain rodenticides that are lethal to raptors and other birds and animals that feed on rats and mice that ingest these anti-coagulant containing poisons. The Applicant should have the pest control vendor perform a site assessment and develop a non-poison IPM plan for vector control using alternative control methods other than anti-coagulant rodenticides both outside and inside the facility. Plan shall be reviewed and approved by DEC Staff and implemented by the Applicant prior to the change in operating hours.

GSE/DRC Response: *The applicant will engage with their existing pest control vendor to prepare a plan on how alternative measures/controls can be used to control vectors. The measures shall include the removal of anti-coagulant rodenticides from both outside and inside the facility. The applicant will engage the vendor and submit a plan to the DEC for subsequent approval. The applicant requests that this be a “condition” of the hearing, which will allow the applicant to engage the vendor or another 3rd party vendor who have had successful experience with methodologies outside of the use of traditional anti-coagulant rodenticides.*

7. **Use of Designated Truck Route.** The Applicant has been diligent in helping to raise awareness of the designated truck route and informing drivers. On-site signage near the scale house and periodic notifications to drivers helps. This is an ongoing education and awareness campaign that needs to continue. Companies found violating the truck route should be warned and repeat offenders banned from the facility.

GSE/DRC Response: Acknowledged as these efforts are continuous between the facility and customers.

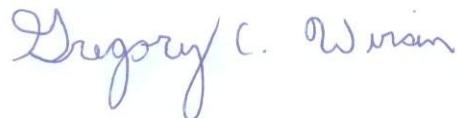
8. **Community Commitments.** Certain commitments were made to the community through a memorandum of understanding as part of the last Site Assignment modification process back in 2009. It is our understanding that the following commitments have not been fulfilled:
 - Installation of a berm along the entire length of the rail siding loading area.
 - **GSE/DRC Response:** At this point in time it does not appear that a berm is necessary.
 - Facility doors will remain closed when deliveries are not being accepted and only the minimum number of doors necessary will be open during deliveries
 - **GSE/DRC Response:** Acknowledged. See pages 13 and 15 of the O&M Plan.
 - odor control system operation and service contract with the equipment supplier (Not in O&M Plan)
 - **GSE/DRC Response:** This is a stand-alone O&M Plan. Presently in-house staff maintain the system.
 - Confirmation that Facility will not accept MSW from restaurants or grocery stores, businesses that process or handle large quantities of food and whose waste may contain large fractions of produce and other organic waste.(not in O&M Plan).
 - **GSE/DRC Response:** This was a historical requirement, which was pre-Waste Ban (310 CMR 19.017) for food waste. Additionally, the facility does vet their clients to identify outlets for their waste streams so that waste that is not conducive to the facility goes to other receiving facilities. The facility does not receive odor complaints, which is a sign of having the proper engineering controls and how they handle their waste delivery logistics. As such the O&M Plan does not need to be modified at this point in time.
 - Confirmation that ventilation fans will supply sufficient airflow to ensure negative pressure and an inflow of outside air into the waste handling building at the rollup door openings. This inflow, in combination with misting nozzles over the door openings will ensure no release of particulate matter outside the facility doors (not in O&M Plan).
 - **GSE/DRC Response:** The ventilation fans are in proper working order as historically required. Additionally, the dust/odor control misting system is functioning as intended. As previously mentioned, DRC will follow the door requirements which is to limit door operations during operations a hours.

- Augment misting system with specially designed solution that destroys odor causing bacteria on contact in the air and on surfaces (not in O&M Plan).
 - **GSE/DRC Response:** Acknowledged. *Presently the facility utilizes products from Atmos-Technologies. <https://atmos-technologies.com/products/odor-and-emissions/>. See pages 34-35 of the O&M Plan.*
- Odor crystals will be applied manually to loads that require additional odor treatment. Manual Shutdown of the ventilation system in the event of an odorous incoming load (not in O&M Plan).
 - **GSE/DRC Response:** Acknowledged. *The facility shall store granular odor control agents on-site and use them as deemed necessary. Also, the O&M Plan has been updated to acknowledge this protocol. See pages 34-35 of the O&M Plan.*
- Facility would include a small educational center with an auditorium for school groups (and the general public) to learn about the importance of recycling. He envisioned a short documentary film and tours of the facility, followed by an opportunity to shop in a small gift store that contained 100% recycled gift items.
 - **GSE/DRC Response :** *DRC does not intend to have a gift shop and/or an open-door policy for unscheduled tours/visits. However, if schools and/or groups want a tour of the facility, it can be scheduled with DRC personnel.*
- Any liquids observed will be contained by absorption onto other waste materials, use of sorbent media (i.e. Speedi-Dry) or by directing the liquids into the facility's trench drain by manual methods (brooms, squeegees) or using the facility's front-end loader equipped with a rubber blade on the bucket.(not included in O&M Plan).
 - **GSE/DRC Response:** Acknowledged and outlined in the revised O&M Plan. See page 32 of the O&M Plan.
- Facility will not accept ash, sewage or other non-solid waste material (not included in O&M Plan).
 - **GSE/DRC Response:** Acknowledged and outlined in the revised O&M Plan. See page 14 of the O&M Plan.
- Expanded misting and odor control system to accommodate MSW. System will dispense odor control agents even when facility is closed.
 - **GSE/DRC Response:** Acknowledged and the misting system can dispense odor control agents as necessary. *Also, the system can be run during non-operational hours, but at this point in time it has not been necessary.*
- Construction and oversight of a dog park for Devens Residents
 - **GSE/DRC Response:** Acknowledged. *As discussed, a dog park within Deven's is not practical as there is a leash law. However, should a municipality contact DRC about a dog park, DRC is willing to create dialog between the interested parties and DRC.*

9. **Devens Initiatives.** The Applicant also committed to a number of initiatives during the 2009 site assignment modification process. One of those was regular trash pick-up along the designated truck routes (Barnum, Patton, and Saratoga) which they have continued to do (thank you). Another was to install fencing along the easterly property boundary to help contain blowing trash. This was completed as well. Other commitments still outstanding include:

- Free Recycling days (4x/year)
 - **GSE/DRC Response:** Acknowledged. *DCR will allow up to 1 ton of C&D to be delivered by residents 4 times annually although the condition states recyclables (e.g. metals, etc.)*
- 2% discount to Devens residents
 - **GSE/DRC Response:** Acknowledged.
- Periodic Accountability and Status meetings
 - **GSE/DRC Response:** Acknowledged. *DRC is willing to attend and participate at all meetings associated with accountability, status and compliance.*

Please let us know if you have questions or comments about our responses. We look forward to the hearing on January 6th.



Gregory Wirsen
Vice President

cc: Josh Mitchell, Republic Services
 Angelo Liquori, Republic Services
 Michael Green, Republic Services

ATTACHMENT 1

CAMARA ANGLES AND DOORWAYS





Back of facility



Rail Pit



Scale House (facing Independence Dr)



Front of Building at Turn Around



Corral for extra empty roll off cans



Back of building facing Down Track



Inside facility facing Rail Pit



Inside Facility (towards Tipping Floor)



Tipping Floor and Pad



