

MEMORANDUM

To: Neil Angus, Devens Enterprise Commission
From: Micheal Lannan, PE and Matthew Riegert, INCE, Tech Environmental
Date: February 25, 2026
Subject: 67 Buena Vista Noise Compliance Update

Ref. 4882

This memorandum summarizes the ongoing noise compliance issues at 67 Buena Vista and recent measurements collected by Acentech and documented in a letter report dated February 18, 2026.

The DEC recently received a list of bullet points from Tech regarding the February 18, 2026 letter from Andy Carballeira of Acentech re: Seqens – Post-Mitigation Noise Measurements 67 Buena Vista Street, Devens, MA, Project Number 637208 report. The compliance approach outlined was significantly different from what had previously been discussed and was not consistent with other DEC sound compliance methodologies. Because the report failed to align with established protocols, Tech raised several basic but important questions concerning discrepancies between the February 18, 2026, report and prior monitoring protocols, previously installed mitigation measures, and earlier assumptions.

It is our understanding that the facility has been operating with operational restrictions during times defined by the DEC as Nights and Weekends (i.e., “Nighttime Mode”), which includes not operating the following equipment:

- EF-9, EF-10, EF-11, MAU-6, and MAU-7, and
- Vent Hoods shut down at night and weekends.

And it was our understanding that the facility was incorporating noise mitigation measures to eliminate those operational restrictions while maintaining compliance with the DEC IPS. However, we are currently unsure of the following after our review of the Acentech letter report dated February 18, 2026:

1. Was the facility operating with equipment restrictions on the night of January 23, 2026, when Acentech collected additional measurements?
2. Does the facility plan to operate in the future with equipment restrictions on nights and weekends?
3. Has the facility completed the installation of all planned noise mitigation and is the installed mitigation consistent with the Primary Controls Package designed by Acentech in January 2024, and presented herein?
4. Has the facility confirmed that the mitigation that has been installed allows the facility to demonstrate compliance with the DEC IPS without operational controls?

Background Information

Tech was made aware of potential nuisance concerns from neighboring properties during the summer of 2023. In response, Tech conducted sound data collection in July 2023, which confirmed elevated sound

levels necessitating mitigation. Subsequently, the facility hired Acentech to perform ambient background sound measurements and recommend mitigation strategies. While some mitigation measures were implemented initially, a substantial portion was deferred, with the intention of installing them only upon confirmed complaints. Acentech's findings and recommended mitigation measures to be implemented if a violation of the DEC Industrial Performance Standards (IPS) was confirmed were presented in a letter to William Williams of Seqens dated January 2, 2024¹ and submitted to the DEC sometime thereafter.

During the summer of 2024, additional noise complaints regarding 67 Buena Vista were reported to the DEC, and Tech was tasked with conducting additional noise surveys surrounding 67 Buena Vista on August 8, 2024 and on August 11, 2024. Those measurements confirmed that the facility was exceeding allowable incremental limits prescribed by the DEC IPS, the results of which were presented in a memorandum to the DEC dated August 14, 2024.

In response to the August 2024 findings, the facility engaged an alternative consultant (Ramboll) to reassess the ambient baseline, instead of proceeding with Acentech's originally recommended mitigation. Ramboll collected additional ambient measurements in December 2024, the results of which were presented in a report dated January 15, 2025². Tech reviewed the report, as well as the raw data provided in spreadsheet form³, and determined that the ambient monitoring data was consistent with previous monitoring conducted by Acentech in November 2023 (i.e., a weekend and nighttime ambient sound level of 30 dBA).

Tech's findings were formalized in a memorandum to the DEC dated February 26, 2025, along with recommendations to install the mitigation measures initially recommended by Acentech to achieve compliance. Those measures were:

1. Install 3' silencers in the discharge stack for existing EF-1, EF-4, EF-5, EF-6, EF-7;
2. Install 5' silencers in the discharge stack for existing EF-15 and EF-16;
3. Install an acoustic louver on the OSA inlet for existing MAU-2 and MAU-3 OSA; and
4. Install a sound-attenuating enclosure achieving about 20 dBA of noise reduction around EF-15, EF-16, and RTU-2.

The DEC emailed Tech's findings and recommendations to Seqens on February 27, 2025⁴ with a request that the facility share the noise reduction actions and installation timeline ASAP. And, that request was repeated via email during the spring and summer months of 2025. And it is our understanding that those details have still not been provided in writing.

The title and text of the letter report by Acentech dated February 18, 2026 ("*Seqens – Post-Mitigation Noise Measurements*") implies that the facility has employed interim mitigation measures since early 2025 and in response to the DEC's request. However, that letter report does not present what mitigation

¹ Deferred Noise Mitigation Recommendations, 67 Buena Vista Street – Devens, MA, Project Number 63720208.021, January 2, 2024.

² PCI – Devens, MA, Background Sound Level Measurement Results, Ramboll, January 15, 2025.

³ via email from Jean-Pascal Mill (jean-pascal.mill@seqens.com), February 20, 2025.

⁴ via email from Neil Angus (neilangus@devensec.com) to Jean-Pascal Mill (jean-pascal.mill@seqens.com), February 27, 2025.

measures have been installed (or when), or what operational restrictions the facility can operate under to demonstrate compliance with the DEC IPS.

The February 18, 2026 letter from Acentech presents short-term sound measurements during winter operations (i.e., 25°F) which does not represent a worst-case condition (i.e., warm/summertime) when past noise complaints have occurred regarding this facility, and presumes an ambient of 34 dBA based on field observations, which is inconsistent with standard industry practice, was not approved by the DEC, and is inconsistent with past monitoring submitted separately by Acentech in November 2023, and by Ramboll in January 2025.

Conclusions

Given that the recent sound study approach was inconsistent with the sound consultant's typical methodology, it raises concern that the facility may be unable to meet DEC requirements under current operating conditions.

Tech sees no technical basis to revisit the original mitigation recommendations set forth in the January 2024 Acentech report or the current operating restrictions. Those measures were specifically designed to address the highest sound sources and the activities contributing the most significant incremental noise to the surrounding area.

If the facility has modified its plan to install all recommended mitigation and to demonstrate compliance with DEC IPS, including under maximum desired operating loads, then the facility should continue operating under the reduced operating mode on a continuous basis unless and until full compliance can be demonstrated.