



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Maura T. Healey  
Governor

Kimberley Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Bonnie Heiple  
Commissioner

July 24, 2025

FirstLight MA Hydro LLC  
Stephen Michaud, Sr.VP of Operations  
99 Millers Falls Road  
Northfield, MA 01360

RE: **ADMINISTRATIVE CONSENT ORDER  
WITH PENALTY**  
BWSC, ER  
RTN(s): 1-0051956  
Enforcement Document # 00020751

Dear Mr. Michaud:

Enclosed is an executed copy of the final, signed copy of the Massachusetts Department of Environmental Protection (MassDEP) Administrative Consent Order (ACO) to resolve violations of the Massachusetts General Law c. 21E and the Massachusetts Contingency Plan (the MCP -310 CMR 40.0000), for the above referenced case. The ACO is effective as of the date of MassDEP's signature on the Order.

Please be aware that the terms and conditions of the ACO are now in effect. MassDEP encourages you to become familiar with these terms/conditions in order to accomplish the requirements and meet the established deadlines.

Thank you for your cooperation in this matter. If you have any questions, please contact Derrick Bruce at (617) 874-6757, ([Derrick.Bruce@Mass.Gov](mailto:Derrick.Bruce@Mass.Gov)) or Tamara.Cardona-Marek at (857) 408-6562, ([Tamara.Cardona-Marek@Mass.Gov](mailto:Tamara.Cardona-Marek@Mass.Gov)).

Sincerely,

/s/ Tamara Cardona-Marek

Tamara Cardona-Marek, PhD  
Deputy Regional Director  
Bureau of Waste Site Cleanup

cc: Town of Montague  
Selectboard

This information is available in alternate format. Please contact MassDEP at 617-292-5500.

TTY# MassRelay Service 1-800-439-2370  
MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

Printed on Recycled Paper

Soloe Dennis, DEP WERO  
Audrey Piubeni, DEP WERO  
Katelyn Kelly, DEP WERO

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

In the matter of:  
FirstLight MA Hydro LLC

Enforcement Document Number:  
00020751  
Issuing Bureau: BWSC  
Issuing Region/Office: WERO  
Issuing Program: BWSC  
Primary Program Cited: BWSC  
Subpgm(s) Cited: WAT  
FMF/Program ID #: RTN 1-0051956

**ADMINISTRATIVE CONSENT ORDER WITH PENALTY  
AND  
NOTICE OF NONCOMPLIANCE**

**I. THE PARTIES**

1. The Department of Environmental Protection (“Department” or “MassDEP”) is a duly constituted agency of the Commonwealth of Massachusetts established pursuant to M.G.L. c. 21A, § 7. MassDEP maintains its principal office at 100 Cambridge Street, Boston, MA 02114, and its Western Regional Office at 436 Dwight Street, Springfield, MA 01103.
2. FirstLight MA Hydro LLC (“Respondent”) is a Company with its principal offices located at 100 District Avenue, Suite 102, Burlington, MA 01903. Respondent’s mailing address for purposes of this Consent Order is 99 Millers Falls Road, Northfield, MA 01360.

**II. STATEMENT OF FACTS AND LAW**

3. MassDEP is responsible for the implementation and enforcement of: M.G.L. c. 21E and the Massachusetts Contingency Plan (“MCP”) at 310 CMR 40.0000; M.G.L. c.21, §§ 26-53, and the Surface Water Discharge Regulations at 314 CMR 3.00. MassDEP has authority under M.G.L. c. 21A, § 16 and the Administrative Penalty Regulations at 310 CMR 5.00 to assess civil administrative penalties to persons in noncompliance with the laws and regulations set forth above.
4. Unless otherwise indicated, the terms used herein shall have the meaning given to them by the MCP, and if such terms are not defined in the MCP, they shall have the meanings given to them by M.G.L. c. 21E. “Property” shall mean the real property located at 1 Gatehouse Drive in Montague, Massachusetts. “The Site” shall mean the particular Site (as that term is defined in the MCP) resulting from releases of oil and/or hazardous materials at the Property. The Site shall include, without limitation, any place or area within or outside the Property where oil and/or hazardous material

resulting from such releases has come to be located. Respondent is a Responsible Party (“RP”) or

Potentially Responsible Party (“PRP”) for the Site as the operator of the site who otherwise caused or is legally responsible for a release or threat of release of oil from a site or vessel.

5. The following facts and allegations have led MassDEP to issue this Consent Order:

- A. The Turners Falls Dam consists of two individual concrete gravity dams: the Gill Dam and Montague Dam. The Montague Dam, built in the late 1800’s, includes four bascule type gates numbered 1 to 4. All four bascule gates are operated by pair of hydraulic cylinders numbered from 1 to 8. The cylinders operate under hydraulic oil pressure provided by a pumping unit inside the Turners Falls Gatehouse. A series of supply and return lines go to the cylinders and return to the pumping unit sump. The hydraulic system, composed of a sump, cylinders, hydraulic pumping unit (HPU), and supply and return lines, has approximately 2,500 gallons of oil.
- B. On February 23, 2022, staining was observed on the ice around pistons 7 and 8 below Bascule Gate #4 of the Turners Falls Dam. Upon reviewing maintenance records for the dam’s hydraulic system, it was noted that Respondent added approximately 418 gallons of hydraulic fluid to the hydraulic system reservoir to top off the reservoir. Based on this information, it is suspected that 418 gallons of hydraulic oil were released to the Connecticut River. MassDEP issued a Notice of Responsibility (NOR) to the Respondent for the persistent sheen to surface water, which is a 2-hour reportable condition. MassDEP assigned Release Tracking Number (RTN) 1-21504 to the release. A Permanent Solution Statement associated with this RTN was submitted to MassDEP in December 2022.
- C. On March 9, 2023, an oil sheen was observed and reported to MassDEP by a member of the public, on the surface water of the Connecticut River below Bascule Gates #1, #2, and #3. MassDEP notified the Respondent of the presence of the sheen. The Respondent performed an inspection of the hydraulic pistons that support the gates and noted hydraulic fluid leakage at pistons 3 and 5 (which operate Gates #2 and #3), the apparent source of the sheen. Upon inspection, absorbents previously placed around these pistons as a protective measure were observed to be saturated with hydraulic oil, indicating leakage from the pistons; however, no oil was observed on those piston structures or on the dam between the structures and the Connecticut River. The Department assigned RTN 1-21749 for the 2-hour reportable condition. A Permanent Solution Statement associated with this RTN was submitted to MassDEP in January 2024.
- D. On April 10, 2023, Respondent provided to MassDEP a response to a Request for Information sent on March 24, 2023. The response indicates that “losses of oil can occur from the various pistons. Leaks can occur from the packing area where the piston shaft passes through or the joints between the cylinders and the cylinder head.” The response also indicates that the system holds 2,600 gallons of oil and “insignificant losses do not require replenishing the system”.

- E. On August 22, 2023, MassDEP issued the Respondent a Notice of Noncompliance (NON), 00016114 for discharging pollutants to the surface waters of the commonwealth without a valid permit from the Department pursuant to M.G.L. c.21, 43 and 314 CMR 3.03(1). This NON was in relation to the March 9, 2023 release. Corrective actions associated with the NON required the Respondent to provide MassDEP with an inspection and maintenance program to identify areas of the dam's hydraulic system for defects and plan(s) to remedy potential leaks and releases from the dam's hydraulic system and associated equipment.
- F. On September 1, 2023, MassDEP received Respondent's Response to Notice of Noncompliance. In the response, Respondent stated that repairs were completed at pistons No. 1 and No. 2 and that Respondent would complete similar repairs at pistons 3-6. Respondent also submitted updates to their maintenance and inspection process to detect potential releases and protocol to remedy potential leaks and releases from the hydraulic system and associated equipment.
- G. On June 3, 2025, at 8:28 PM, MassDEP was notified by the Respondent of a sheen observed on surface water in the vicinity of the Turners Falls Dam. At the time of the notification, response actions were limited by the higher-than-average flow rate of the river and the nighttime conditions. The Department approved immediate response actions at the time of notification including the deployment of absorbents and containment booms.
- H. On June 4, 2025, MassDEP responded to the scene for further investigation. During the investigation, it was determined that a low sump alarm for the dam's hydraulic piston system was triggered on June 3, 2025, at approximately 6:00 PM, indicating low hydraulic oil levels in the oil reservoir. Over the course of the evening, Respondent reported that approximately 445 gallons of hydraulic oil was added to the reservoir to return the system to normal operational capacity. Based on this information, it is suspected that 445 gallons of hydraulic oil were released to the Connecticut River. As reported to MassDEP, the release might have occurred due to a malfunctioning check valve or a hose leak associated with the hydraulic piston of Bascule Gate #2. However, Respondent could not confirm the source until the inspection of Bascule Gate No. 2 took place. The Respondent retained Clean Harbors, Inc. to provide spill-response services, which included the deployment of booms and absorbents to the surface water to contain the existing sheen. Booms remained in place until June 6, 2025, when the sheen was no longer present. The Department assigned RTN 1- 021956 to the release and issued an NOR on June 16, 2025.
- I. During a meeting with MassDEP on July 7, 2025, Respondent indicated that, in addition to updating maintenance and inspection processes, Respondent had performed various activities to reduce or eliminate leaks from the pistons in the summer of 2023. Documentation regarding these activities has not been formally submitted to the Department. During this same meeting, Respondent stated that in April 2023 it began evaluating other potential improvements and retained an engineering firm to assess the bascule gates. Respondent reported that the engineering firm recommended replacement of the cylinders. Replacement of the first two cylinders is tentatively scheduled for the fall of 2025. If the replacement proves successful, Respondent will begin replacing the remaining

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cylinders. On July 8, 2025, Respondent inspected Bascule Gate No. 2, identified a leaking hose, which was the presumed cause of the release Respondent reported to MassDEP on June 3, 2025. That same day, Respondent replaced the hose, tested the Gate and returned the Gate to full operation.

- J. No person shall discharge pollutants to the surface waters of the Commonwealth without a valid permit from the Department pursuant to M.G.L. c.21,43 and 314 CMR 3.00. The Respondent discharged pollutants to the Connecticut River on June 3<sup>rd</sup>, 2025 without a valid permit, in violation of 314 CMR 3.03(1).
- K. Pursuant to 310 CMR 40.0312(1), owners or operators of a site at which there is a threat of release are required to notify the Department within 2 hours of obtaining knowledge that a threat of release is present. Respondent did not timely notify.

### III. DISPOSITION AND ORDER

For the reasons set forth above, MassDEP hereby issues, and Respondent hereby consents to this Order:

6. The parties have agreed to enter into this Consent Order because they agree that it is in their own interests, and in the public interest, to proceed promptly with the actions called for herein rather than to expend additional time and resources litigating the matters set forth above. Respondent enters into this Consent Order without admitting or denying the facts or allegations set forth herein. However, Respondent agrees not to contest such facts and allegations for purposes of the issuance or enforcement of this Consent Order.

7. MassDEP's authority to issue this Consent Order is conferred by the Statutes and Regulations cited in Part II of this Consent Order.

8. Respondent shall perform the following actions:

- A. Within sixty (60) days of the effective date of this Consent Order, Respondent shall retain a licensed professional engineer to assess the dam hydraulic system and associated alarm systems for potential upgrades and/or modifications to prevent future releases. If repairs have already been conducted as a result of the June 3, 2025 release, they must be documented in the report requested in paragraph 8.B.
- B. Within hundred and eighty (180) days of the effective date of this Consent Order, the Respondent shall submit a report to the Department summarizing the findings of the professional engineer's assessment and the Respondent's plans to implement the upgrades and/or modifications. This engineering report shall include a proposed timeline for implementation and completion of each of the recommended upgrades/modifications.
- C. All engineering work performed pursuant to this Consent Order shall be under the general direction and supervision of a qualified professional engineer registered in Massachusetts experienced in hydraulic system management and design. Any

contractual relationship between Respondent and the engineer for work required hereunder shall require the engineer, as a condition of the contract, to implement work consistent with the provisions of this Consent Order.

D. By no later than one (1) year from the date of submission of the engineering report required above, Respondent shall implement and complete all recommendations from that report, unless MassDEP specifically agrees, in writing, to a longer time period.

9. Unless submitted via eDEP or except as otherwise provided herein, all notices, submittals and other communications required by this Consent Order shall be directed to:

Tamara Cardona-Marek, PhD  
Bureau of Waste Site Cleanup  
Massachusetts Department of Environmental Protection  
436 Dwight Street, Springfield Massachusetts 01103

Such notices, submittals and other communications shall be considered delivered by Respondent upon receipt by MassDEP.

10. Actions required by this Consent Order shall be taken in accordance with all applicable federal, state, and local laws, regulations and approvals. This Consent Order shall not be construed as, nor operate as, relieving Respondent or any other person of the necessity of complying with all applicable federal, state, and local laws, regulations and approvals.

11. For purposes of M.G.L. c. 21A, § 16 and 310 CMR 5.00, this Consent Order shall also serve as a Notice of Noncompliance for Respondent's noncompliance with the requirements cited in Part II above. MassDEP hereby determines, and Respondent hereby agrees, that any deadlines set forth in this Consent Order constitute reasonable periods of time for Respondent to take the actions described.

12. Respondent shall pay to the Commonwealth a civil administrative penalty for the violations identified in Part II above, as follows:

- A. Within thirty (30) days of the effective date of this Consent Order, Respondent shall pay to the Commonwealth twenty-thousand dollars (\$20,000.00); and
- B. If Respondent violates any provision of this Consent Order, or further violates any of the regulations cited in Part II above within two (2) years of the effective date of this Consent Order, Respondent shall pay to the Commonwealth the remaining amount of five thousand sixty two dollars (\$5,062.00) within thirty (30) days of the date MassDEP issues Respondent a written demand for payment.

This paragraph shall not be construed or operate to bar, diminish, adjudicate, or in any way affect, any legal or equitable right of MassDEP to assess Respondent additional civil administrative penalties, or to seek any other relief, with respect to any future violation of any provision of this Consent Order or any law or regulation.

13. This paragraph shall not be construed or operate to bar, diminish, adjudicate, or in any way affect, any legal or equitable right of MassDEP to assess Respondent additional civil administrative penalties, or to seek any other relief, with respect to any future violation of any provision of this Consent Order or any law or regulation.

14. Respondent shall pay all civil administrative penalties due under this Consent Order, including suspended and stipulated penalties, and if applicable, past due annual compliance fees, by credit card, electronic transfer, certified check or cashier's check. To pay your MassDEP Invoice online with credit card or ACH payment, please visit: <http://www.masspays.com/dep>. Respondents paying by check shall make it payable to the Commonwealth of Massachusetts and clearly print on the face of their payment the Respondent's full name, the file number appearing on the first page of this Consent Order, and the Respondent's Federal Employer Identification Number, and shall mail it to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
Commonwealth Master Lockbox  
P.O. Box 3982  
Boston, Massachusetts 02241-3982

To request copies of the outstanding invoices or correct any information on the invoice(s), including billing name, address, etc., please fill out the Annual Compliance Fee Notification form: [https://massgov.formstack.com/forms/dep\\_acf\\_notification](https://massgov.formstack.com/forms/dep_acf_notification). For general questions regarding annual compliance fees, please contact the MassDEP by email at [dep.compliance-fees@mass.gov](mailto:dep.compliance-fees@mass.gov) or call 1-888-846-4067.

15. Respondent understands, and hereby waives, its right to an adjudicatory hearing before MassDEP on, and judicial review of, the issuance and terms of this Consent Order and to notice of any such rights of review. This waiver does not extend to any other order issued by the MassDEP.

16. This Consent Order may be modified only by written agreement of the parties hereto.

17. The provisions of this Consent Order are severable, and if any provision of this Consent Order or the application thereof is held invalid, such invalidity shall not affect the validity of other provisions of this Consent Order, or the application of such other provisions, which can be given effect without the invalid provision or application, provided however, that MassDEP shall have the discretion to void this Consent Order in the event of any such invalidity.

18. Nothing in this Consent Order shall be construed or operate as barring, diminishing, adjudicating or in any way affecting (i) any legal or equitable right of MassDEP to issue any additional order or to seek any other relief with respect to the subject matter covered by this Consent Order, or (ii) any legal or equitable right of MassDEP to pursue any other claim, action, suit, cause of action, or demand which MassDEP may have with respect to the subject matter covered by this Consent Order, including, without limitation, any action to enforce this Consent



Order in an administrative or judicial proceeding.

19. Nothing in this Consent Order shall be construed or operate as barring, diminishing, adjudicating or in any way affecting any legal or equitable right of MassDEP to recover costs incurred by MassDEP in connection with response actions conducted at the Site.

20. The payment of any penalty in this matter shall not be construed or operate as barring, diminishing, adjudicating or in any way affecting any legal or equitable right of MassDEP to recover damages in any separate action for injury to and for destruction or loss of natural resources, including the costs of assessing and evaluating such injury, destruction or loss, pursuant to M.G.L. c. 21E, § 5 or 42 U.S.C. 9601, et seq.

21. Nothing in this Consent Order shall be construed or operate as barring, diminishing, adjudicating or in any way affecting MassDEP's authority to: (a) perform response actions at the Site or (b) require Respondent to conduct response actions at the Site or take other actions beyond those required by this Consent Order in order to comply with all applicable laws and regulations including, without limitation, M.G.L. c. 21E and the MCP.

22. This Consent Order shall not be construed or operate as barring, diminishing, adjudicating, or in any way affecting, any legal or equitable right of MassDEP or Respondent with respect to any subject matter not covered by this Consent Order.

23. This Consent Order shall be binding upon Respondent and upon Respondent's successors and assigns. Respondent shall not violate this Consent Order and shall not allow or suffer Respondent's members, managers, employees, agents, contractors or consultants to violate this Consent Order. Until Respondent has fully complied with this Consent Order, Respondent shall provide a copy of this Consent Order to each successor or assignee at such time that any succession or assignment occurs.

24. In addition to the penalty set forth in this Consent Order, if any (including any suspended penalty), Respondent shall pay stipulated civil administrative penalties to the Commonwealth in accordance with the following schedule if Respondent violates any provision of this Consent Order:

For each day, or portion thereof, of each violation, Respondent shall pay stipulated civil administrative penalties in the following amounts:

<u>Period of Violation</u>	<u>Penalty per day</u>
1st through 15th days	\$500 per day
16th through 30th days	\$750 per day
31st day and thereafter	\$1,000 per day

Stipulated civil administrative penalties shall begin to accrue on the day a violation occurs and shall continue to accrue until the day Respondent corrects the violation or completes performance, whichever is applicable. Stipulated civil administrative penalties shall accrue regardless of whether MassDEP has notified Respondent of a violation or act of noncompliance. All stipulated

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civil administrative penalties accruing under this Consent Order shall be paid within thirty (30) days of the date MassDEP issues Respondent a written demand for payment. If simultaneous violations occur, separate penalties shall accrue for separate violations of this Consent Order. The payment of stipulated civil administrative penalties shall not alter in any way Respondent's obligation to complete performance as required by this Consent Order. MassDEP reserves its right to elect to pursue alternative remedies and alternative civil and criminal penalties which may be available by reason of Respondent's failure to comply with the requirements of this Consent Order. In the event MassDEP collects alternative civil administrative penalties, Respondent shall not be required to pay stipulated civil administrative penalties pursuant to this Consent Order for the same violations.

Respondent reserves whatever rights it may have to contest MassDEP's determination that Respondent failed to comply with the Consent Order and/or to contest the accuracy of MassDEP's calculation of the amount of the stipulated civil administrative penalty. Upon exhaustion of such rights, if any, Respondent agrees to assent to the entry of a court judgment if such court judgment is necessary to execute a claim for stipulated penalties under this Consent Order.

25. The Respondent shall pay all civil administrative penalties due under this Consent Order, including suspended; or stipulated penalties and/or any associated fees, as provided in "Respondent Payment Options," attached hereto and incorporated by reference herein. In the event Respondent fails to pay in full any civil administrative penalty as required by this Consent Order, then pursuant to M.G.L. c. 21A, § 16, Respondent shall be liable to the Commonwealth for up to three (3) times the amount of the civil administrative penalty, together with costs, plus interest on the balance due from the time such penalty became due and attorneys' fees, including all costs and attorneys' fees incurred in the collection thereof. The rate of interest shall be the rate set forth in M.G.L. c. 231, § 6C.

Respondent Payment Options

**The Respondent has five options for payment;**

**Option 1:** certified check;

**Option 2:** cashier's check;

**Option 3:** company/corporate check;

**Option 4:** on-line payment using a credit card (not available for payment plan) or

**Option 5:** electronic transfer.

**Options 1, 2, and 3:**

Certified, cashier's, company/corporate checks must be made payable to the Commonwealth of Massachusetts and paid as provided in the Consent Order.

If payment is made by certified check, cashier's, company/corporate check, the Respondent shall clearly print on the face of its payment Respondent's full name, the enforcement document number appearing on the first page of this Consent Order, and Respondent's Federal Employer Identification Number, and shall mail it to:

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Commonwealth of Massachusetts  
Department of Environmental Protection  
Commonwealth Master Lockbox  
P.O. Box 3982  
Boston, Massachusetts 02241-3982

**(IMPORTANT NOTE: DO NOT INCLUDE THE SIGNED ACOP WITH PAYMENT BY CHECK)**

**Option 4:**

On-line Payment Using Credit Card (not available for payment plan)

Once you receive the Consent Order, if you wish to make your on-line payment, please contact the Revenue Department at [dep.admp@mass.gov](mailto:dep.admp@mass.gov) or 800-248-1645 for assistance. After contacting the Revenue Department, you will receive information needed to use the below link to pay.

LOG ONTO THE MassDEP e-PAYMENT WEB SITE AT:

[HTTPS://WWW.MASSPAYS.COM/dep](https://www.masspays.com/dep)

On-line payment using credit card is due as provided in the Consent Order.

Contact the Revenue Department at [dep.admp@mass.gov](mailto:dep.admp@mass.gov) or 800-248-1645 if you have questions about paying on-line.

**Option 5:**

Electronic Funds Transfer

Respondent must complete the Administrative Penalty Notification Form found at <https://massgov.formstack.com/forms/apn> to request payment by Electronic Funds Transfer. The form can also be used to correct any information on the invoice, including billing name, address, etc. MassDEP will respond by email with all the information needed to set up the EFT payments. EFT payment is due as provided in the Consent Order.

In the event Respondent fails to pay in full any civil administrative penalty as required by this Consent Order, then pursuant to M.G.L. c. 21A, § 16, Respondent shall be liable to the Commonwealth for up to three (3) times the amount of the civil administrative penalty, together with costs, plus interest on the balance due from the time such penalty became due and attorneys' fees, including all costs and attorneys' fees incurred in the collection thereof. The rate of interest shall be the rate set forth in M.G.L. c. 231, § 6C.

26. Failure on the part of MassDEP to complain of any action or inaction on the part of Respondent shall not constitute a waiver by MassDEP of any of its rights under this Consent Order. Further, no waiver by MassDEP of any provision of this Consent Order shall be construed as a waiver of any other provision of this Consent Order.

27. To the extent authorized by the current owner, Respondent agrees to provide MassDEP, and MassDEP's employees, representatives and contractors, access at all reasonable times to the Property for purposes of conducting any activity related to its oversight of this Consent Order.

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Notwithstanding any provision of this Consent Order, MassDEP retains all of its access authorities and rights under applicable state and federal law.

28. This Consent Order may be executed in one or more counterpart originals, all of which when executed shall constitute a single Consent Order.

29. This Consent Order does not relieve Respondent's obligation to pay Annual Compliance Assurance Fees pursuant to 310 CMR 4.00 et. seq.

30. All applicable transmittal fees shall accompany any submission(s) required by this Consent Order.

31. The Respondent shall comply with all applicable Public Involvement activities regarding the Site, as described in 310 CMR 40.1400.

32. The undersigned certify that they are fully authorized to enter into the terms and conditions of this Consent Order and to legally bind the party on whose behalf they are signing this Consent Order.

33. This Consent Order shall become effective on the date that it is executed by MassDEP.

### **SPECIAL INSTRUCTIONS:**

Your two **signed copies of the Administrative Consent Orders** with Penalty (ACOP) must be delivered, for execution (signature) by MassDEP, to the following address:

Tamara Cardona-Marek, PhD  
Bureau of Waste Site Cleanup  
Massachusetts Department of Environmental Protection  
436 Dwight Street, Springfield Massachusetts 01103

MassDEP will return **one signed copy** of the ACOP to you after MassDEP has signed, provided you have followed the above instructions.

Payment will be due, pursuant to the instructions outlined within the ACOP after you receive your fully executed copy.

**PLEASE DO NOT INCLUDE YOUR PAYMENT WITH THE SIGNED ACOPs SIGNED ACOPS ARE TO BE SENT TO THE ABOVE ADDRESS.**

In the Matter of: FirstLight MA Hydro LLC  
ACOP # 00020751

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Please call Derrick Bruce at (617) 874-6757 if you have questions regarding payment and/or instructions.

**Consented To:**  
**FIRSTLIGHT MA HYDRO LLC**

By: Stephen Michaud  
Stephen Michaud, Sr. VP Operations  
Federal Employer Identification No.:  
001377928

Date: 07/24/2025

**Issued By:**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**

By: Michael Gorski  
Michael Gorski, Regional Director  
Massachusetts Department of Environmental Protection  
436 Dwight Street, Springfield, MA 01103

Date: July 24, 2025