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August 3, 2021

Planning Board
Town of Boxborough
29 Middle Road
Boxborough, MA 01719
Via email

Re: Arranta Bio MA2, LLC ("Arranta Bio")/ Proposed Facility/1414 Massachusetts Avenue/Boxborough, MA 01719/Assessor Map 13, Lot 4/(LDG Proj#1729.00)

Dear Members of the Board:

At the August 30th hearing regarding the above matter, the Board discussed the issue of Arranta Bio's compliance with the Zoning Bylaw. In prior correspondence we have made reference to our July 12, 2021 request for a Zoning Determination Letter. We would like to take this opportunity to highlight a few facts pertaining to said request and Arranta Bio's proposed uses.

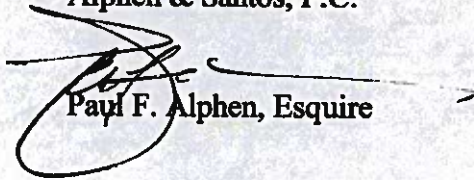
The focus of your concerns appears to focus on the question: will Arranta Bio's use of hazardous materials be incidental to the principal uses associated with the development, manufacturing and analyzing small volume Pharmaceutical products in the facility. As the pharmaceutical products are intended to treat and improve the lives of people, they are required to be manufactured to the highest standards of control and cleanliness to ensure their safety and efficacy.

Upon further review of the definition in the Zoning Bylaw of "Toxic or Hazardous Materials", we would like to go on record that Toxic or Hazardous Materials are ONLY used for the cleaning of equipment, tools and surfaces to assure that the pharmaceuticals are tested and manufactured in the cleanest environment possible. Materials like ethanol are used to clean and disinfect equipment and surfaces.

We had previously reported that some hazardous materials are used during the manufacturing process to control for pH or achieve separation of the product of interest during the purification process, but, such materials (weak acid like acetic acid [commonly known as vinegar] and sodium hydroxide [commonly known as caustic soda]) do not meet the definition of "Toxic or Hazardous Materials" contained in the Zoning Bylaw.

We trust that this information supports the conclusion that the use of such materials are only incidental to the principal uses. Thank you for your attention to this matter, and please do not hesitate to contact me at any time.

Very truly yours,
Alphen & Santos, P.C.



Paul F. Alphen, Esquire