

Hello Linda,

I am writing with comments on the request by Waste Management Disposal Services for a determination of public benefit for a proposed expansion of the Crossroads Landfill.

Waste Management's application lacks sufficient information necessary to determine whether the company's proposed Norridgewock dump expansion would provide public benefit for the state of Maine.

It is unclear whether permitting an additional 53-acres for waste disposal will meet the state's capacity needs. There is significant pressure from neighboring state to send their waste to Maine. There is no guarantee that increased landfill space in Norridgewock will be benefit surrounding Maine communities.

I own property in Athens, which has a contract to send its waste to the Crossroads landfill. The town's disposal rate with Waste Management has steadily increased, making it the one of the largest items in the town budget. This proposal could result in Maine communities footing the bill for the expansions, while out-of-state waste generators see the financial benefits of new affordable landfill capacity.

Following China's implementation of policies rejecting of contaminated recyclables, Northeast waste processors are scrambling to find new locations for millions of bales of these rejected materials.

According to a May 2018 article by James Thompson in Waste Business Journal [nrra.net/sweep/time-is-running-out-the-u-s-landfill-capacity-crisis/]:

*Because of China's new rules, the bottom has dropped out of the recycling market and is expected to remain in the doldrums for several years while new infrastructure is developed. As a result, **material recovered in curbside recycling programs increasingly is being diverted to landfills or incinerators.***

*[...]Regionally, **the Northeast is most heavily affected, losing approximately 30% of its capacity over the next five years**[...]*

New Hampshire and Massachusetts both recently rejected proposals to expand major landfills, and are instead shutting down facilities and decreasing landfill disposal capacity within their states. Massachusetts has enacted bans on landfilling compostable organics (which can range from composted food to sludge and diapers), and many municipalities and businesses to the south are finding it most cost effective to send these "organics" to Maine facilities.

Waste Management's proposal would expand the company's capacity for processing these "organic" wastes, however the application does not address what volume of these materials would be processed through the facility, it does not address impact on methane gas production, and it does not address the impact of leachate on local and regional water supplies.

Depending on what materials are disposed of in the new facility and how gas production is managed, chances of fires at the dump could increase. It is unclear what caused the fires at the Crossroads landfill that burned for over two weeks during early summer 2018, what materials were combusted in that fire, or how this sort of failure would be prevented in the future with increased waste dumping and gas production.

Increasing the volumes of waste imported to Norridgewock will lead to much greater volumes of leachate production, placing pressure on Maine's groundwater and rivers. It is unclear what public benefit will result from increased volumes of landfill leachate being transported to SAPPI to be pumped into the Kennebec through the mill's wastewater treatment system.

The largest portion of waste going into the Norridgewock dump is so-called "special" waste, which includes incinerator ash, sludge, oil and solvent contaminated soils, and asbestos.

According to Waste Management's application (page 10), ALL of the out-of-state waste going into the Crossroads facility is special waste. The application fails to state how much of that special waste contains asbestos.

Many of these "special" materials are classified as hazardous waste in neighboring states, and either prohibited from those states' landfills or subject to significantly higher disposal costs than found in Maine. Waste Management's application for determination of public benefit is extremely vague about how much of the expanded facility would be devoted to special wastes.

Increasing landfill capacity in Maine at the same time neighboring states are shutting down their landfills will increase economic pressure to take in as much out-of-state waste as possible at the Norridgewock dump. There is no guarantee that this increased landfill space will meet capacity needs of the state of Maine.

I urge you to reject this application for its failure to demonstrate needed public benefit from Waste Management's proposal.

Thank you for your time.

Sincerely,
Hillary Lister

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