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Sent: Thursday, April 29, 2021 8:54 AM
To: Eleftheriou, Victoria H
Subject: Approval with Conditions for Waste Management license application #S-010735-WD-YB-N

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Dear Victoria,

The Public Comment period on the draft decision needs to be extended to allow adequate participation by people in impacted communities.

I urge the Department to extend the extremely short comment period being offered to members of the Public on the draft licensing decision. Five working days is the minimum - the DEP has extended public comment, historically, on decisions of this complexity and impact.

Waste Management's Crossroads landfill in Norridgewock is the only landfill in Maine licensed to take "special waste." Special waste may include incinerator ash, sludge, oil and solvent contaminated soils, asbestos, and laboratory waste. The remainder of the waste will be construction and demolition debris, oversize bulky waste, and commercial and residential municipal solid waste.

WMI's Norridgewock facility has previously been licensed to take in medical waste. Trucks from the medical waste processing facility Oxus have been seen going to the Norridgewock facility. Medical and laboratory waste is imported from surrounding states and Canada for processing by Oxus in Pittsfield, Maine. It is not clear from the application whether WM's new landfill will be licensed to take medical or lab waste, and if so, how much.

Approving this new landfill site would create new capacity in Maine for out-of-state waste. Many of the waste materials that would be allowed at the new landfill are currently banned from landfills in other northeast states and provinces where they originate.

Adding major landfill capacity with no enforceable limits on growth will only serve to make it more profitable for more affluent northeast communities to dump in Maine landfills instead of managing their own wastes. The application does not demonstrate how the company would be in compliance with the licensing criteria requirement of compliance with the State's Solid Waste Management Hierarchy.

Risks to Water -The proposed location of new landfill is surrounded by water within a mile on all sides. To the north are wetlands and Bombazee Brook, and the Kennebec River runs to the north and east of the facility. Mill Stream is located to the northwest, west, and south of the proposed landfill, within 1/4 mile or less of the proposed new site. Building the landfill would also require destruction of 10 acres of wetlands.

No testing or treatment of leachate for PFAS/PFOS will be required, even though the landfill would be approved to take in large volumes of PFAS/PFOS-contaminated sludge (as has been occurring at the current landfill.) In 2019 tests of Kennebec River fish by the DEP, the testing location beneath Shawmut dam, located downstream of the Waste Water Treatment Plant on the Kennebec where the majority of the current WM landfill leachate is discharged, was also the site of the highest levels of PFOS in fish, with levels more than double those of any other test location.

The application is not clear whether there are adequate stormwater management systems planned for the new landfill. Wetlands serve to regulate and control flooding. It is not clear if removing a major wetland will impact water movement in cases of major storms. Historic floods in this area have resulted in significant movement of stream and riverbeds. ***The license application does not address how the surrounding waters will be protected from contamination in cases of major storms and floods.***

History - In the late 1980's the old Norridgewock landfill by this site was the site of a major subsidence event, where the pile of (mostly out-of-state) waste collapsed. Local wells were destroyed and sewage fungus and other contaminants were found in Mill stream. The geology of this area has been historically unstable. Piling tons of waste over the land could result in mass movement of earth materials, such as landslides, mud slides, slumps, earth flows, subsidence or debris flows can impact groundwater movement. The application does not address the threat of subsidence as the weight of the material disposed in the new landfill could disrupt the underlying geology. ***Licensing a landfill surrounded on all sides by wetlands, streams, and a river, and taking in large volumes of wet wastes like hazardous sludge, creates a serious risk of contaminating that water if there was another subsidence event, major storm, flood, or fire.***

The well monitoring and assessment of hydrogeology referenced in the WMI application is based on site evaluations, paid for by the company, done during in a period of severe drought, and this is not necessarily representative of long term water levels or water flow patterns. Independent reviews of hydrogeology and longer term study of water flow patterns and well monitoring is needed to accurately evaluate the impact of the proposed landfill on aquifers.

The application does not show that the company has demonstrated compliance with the licensing criteria that no unreasonable risk that a discharge to a Significant Ground Water Aquifer will occur.

Fire and Gas Risks - Two acres of the northeast corner of the Crossroads landfill set on fire in the summer of 2018. According to local reports, construction and demolition debris chips used as cover on a portion of the Crossroads landfill spontaneously combusted, requiring response from multiple departments and State helicopters, resulting in the injury of several local firefighters, and a plume of toxic smoke that issued from the smoldering landfill for weeks.

In the summer of 2020 there was another fire at the WM landfill, reportedly in the same section of the landfill where the 2018 fire happened. Waste Management did not notify neighbors of this fire. According to WM in its application, determined that these fires were both ignited by hot embers contained within inadequately quenched biomass ash received at the facility, that originally appeared quenched when delivered. WM states that the facility delivering the ash has improved its ash quenching procedures, and that hot loads will be delivered to a paved section of the landfill in the future.

While the DEP draft decision acknowledges that there have been multiple fires at the current facility, the mitigation offered by the company is inadequate to protect to the air quality, health of local people, and stability of the landfill liner.

The Fire Prevention Plan does not address the fact that an increase in landfill size will also increase the volume of materials, including hot loads of ash and combustible CDD waste. The license conditions contain no requirements to repair a landfill liner or pipelines damaged by fire.

Depending on what materials are disposed of in the new facility and how gas production is managed, the risk of landfill fires is likely to increase. ***The new facility will include major expansions of gas pipelines, storage tanks, flare sites, and generating facilities, with no clear safety plan to prevent landfill fires from causing damage to the gas processing infrastructure of the facility or the safety of neighbors downwind.***

Thank You,

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Ant Blasi