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Sent: Monday, May 03, 2021 2:44 PM
To: Eleftheriou, Victoria H
Subject: Comment on Approval with Conditions for Waste Management license application #S-010735-WD-YB-N

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To Whom it May Concern:

My name is Sam Bullard and I am writing in opposition to the DEP's recent Approval with Conditions for Waste Management license application [#S-010735-WD-YB-N](#), and Waste Management Inc's application to expand Crossroads Landfill in Norridgewock. I am the Co-Program Director of the Peace & Justice Center of Eastern Maine and a resident of Bangor.

It is deeply concerning to hear that the DEP has drafted an approval for WMI's expansion, which would threaten the drinking supply, air quality, and general health of so many living in the Kennebec region, as well as aquatic life downstream from Norridgewock.

According to Maine law, to qualify for a license for landfill expansion an entity must demonstrate that the proposed facility & its operations will provide substantial Public benefit, and will not pollute any water of the State, contaminate the ambient air, create a nuisance, or constitute a hazard to health or welfare. WM's application does not provide adequate information to demonstrate that the proposed waste facility will not pollute groundwater, contaminate ambient air, create a nuisance, or constitute a hazard to health or welfare.

It is extremely likely that the expansion would in fact have devastating effects on water quality and be a hazard to the health and welfare of both the area's citizens and ecology.

One need not look farther than the Penobscot River for an example of the devastating effects of "special waste" on water quality. The average of 1.3 Million gallons of landfill leachate being dumped into the Penobscot monthly by ND Paper Mill Wastewater Treatment Plant (from Juniper Ridge Landfill) is concentrated with toxins from exactly the same kind of waste and debris that would come to the proposed Crossroads Landfill expansion site.

Approving WMI's expansion would create new capacity in Maine for out-of-state waste, which is already far too dangerous and toxic for other states to accept. Many of the waste materials that would be allowed at the new landfill are currently banned from deposition in other northeast states and provinces where they originate. Why is Maine volunteering its beautiful rivers and landscapes as dumping grounds? Especially at a time when restoration of the Kennebec River is critical to saving Wild Atlantic Salmon from extinction in North America, the DEP needs to do EVERYTHING in its power to protect this watershed.

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.

The risks to Maine water are enormous. The proposed location of the 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.

Furthermore, 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.

The well monitoring and assessment of hydrogeology referenced in the WMI application is based on site evaluations, paid for by the company, done during 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.

There are also a number of fire and gas risks that have not been adequately evaluated. In both 2020 and 2018, two acres of the northeast corner of Crossroads Landfill caught on fire from a spontaneous combustion of construction/demolition debris chips that were being used as a cover. These incidents resulted in a toxic plume of smoke, and with the expansion this type of incident is likely to increase. 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.

For all these reasons and more, I am in deep opposition to the expansion of Crossroads Landfill, which is really more like the establishment of a new and more destructive landfill than what is already harming the area. I do not believe the DEP has done sufficient environmental impact evaluation of this expansion, nor allowed enough time for public input. Please, for the future of Maine citizens, waterways, and Native species, do not approve WMI's expansion.

Sincerely,

Sam Bullard

(she/they)

Co-Program Director

Peace & Justice Center of E. Maine