

## Eleftheriou, Victoria H

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**From:** Annette N. Sherrod  
**Sent:** Tuesday, May 04, 2021 1:15 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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Good afternoon,

My name is Annette 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 grew up near the Kennebec River Valley, rafting and hiking, and the pristine natural landscapes are very dear to my heart. I currently work closely with legal advocacy groups that have an interest in keeping New England's environment healthy and safe for all citizens.

It is deeply concerning to hear that the DEP has drafted an approval for WMI's expansion. This expansion would threaten the drinking supply, air quality, and general health of so many living in the Kennebec Valley region, as well as all aquatic life for miles downstream towards 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 1.3 Million gallons of landfill leachate being dumped into the Penobscot each month by ND Paper (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? Why will Maine accept what other states have deemed too dangerous toxic?

Maine is unique and beloved precisely because of its natural beauty and the health this environment provides to its inhabitants. Volunteering its beautiful rivers and landscapes as dumping grounds is ill-advised and dangerous, *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 waste. 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.

There is a fixed, finite amount of water on this planet and the water cycle is continuous, so what happens in one region carries over into the next. 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. During floods, snowmelts, or seasonal rains, any toxic substances will absolutely leach into the surrounding soil and flow into neighboring rivers, lakes, and streams, into groundwater reservoirs and wells on private property. Building the landfill would also require the 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.

Additionally, the application does not make 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 streams 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 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 fire from 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.

Furthermore, expanding the landfill does not address the core problem of providing more safe, efficient, and cost-effective waste management in the state, nor the broader structural problem of producing unsustainable or toxic waste products and materials. It is a temporary solution at best, and a disastrous mistake at worst. Time and resources could be better spent addressing alternate solutions to waste management.

For all these reasons and more, I stand in strong opposition to the expansion of Crossroads Landfill. All it will serve to do is exacerbate the harm of an extant facility. I do not believe the DEP has done sufficient environmental impact evaluation of this expansion, nor allowed enough time for public input. I sincerely ask that for the future of Maine citizens, waterways, and Native species—for the good of all—do not approve WMI's expansion.

Regards,

Annette N. Sherrod