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Sent: Tuesday, May 04, 2021 9:39 AM
To: Eleftheriou, Victoria H
Subject: Comment on Approval with Conditions for Waste Management license application #S-010735-WD-YB-N

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My name is Morgan Spencer 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 work in economic development in Franklin County, and our relationship with Somerset and Kennebec Counties is substantial - when one of us rises, we all rise to create a region with a better quality of life for all of our residents. That quality of life is dependent on clean water, air quality, the health of our residents, and the aquatic life downstream from Norridgewock - both for the health of the environment as well as the natural resources that the tourism industry relies on.

It is deeply concerning to hear that the DEP has drafted an approval for WMI's expansion.

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.**

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?**

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.)

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.

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,

Morgan Spencer

Farmington, Maine