

Magog, October 29, 2018

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**Opposition to the expansion of New England Waste Services of Vermont Inc (NEWSVT)'s solid waste disposal plant in Coventry**

With this letter, Members of the Board of Directors of Memphremagog Conservation Inc. (MCI) wish to express our strong opposition to the expansion of NEWSVT's solid waste disposal plant in Coventry, near Newport, and our wish that the hearing be reconvened.

Operated by Casella Waste Systems, the Coventry landfill site is the only waste management facility in the State of Vermont. Over the years, the operations of NEWSVT have gradually increased. Its starting capacity of 270,000 tonnes per year was raised to 370,000 by 2005 and to 600,000 tonnes per year by 2013. Casella is now applying for a 51-acre expansion of the landfill, which would allow it to bury 500,000 tons a year of waste there for an additional 22 years.

The site is located adjacent to the Black River, located at the top of Lake Memphremagog. The lake flows north from the U.S. to Canada, where 73% of the lake lies. In Canada, six municipalities are located on the lakeshore and 185,000 people get their drinking water from the lake, including the Cities of Sherbrooke and Magog. The lake is also important for the region because of its recreational value, its tourist attractions and its highly-valued natural resources. As well, a lot of residents of the region consume the lake's fishes. This makes Lake Memphremagog one of the most important lakes in the Province of Quebec and the need to protect it from potential sources of pollution cannot be overstated.

NEWSVT buries not only municipal solid waste, but sewage sludge, asbestos, ash, and contaminated soil at Coventry Landfill. This solid waste contains thousands of contaminants, including heavy metals, volatile organic compounds, pharmaceuticals, and other contaminants of emerging concern. Even if the proposed Coventry Landfill expansion would be required to have a two-liner composite system, the liners often develop holes during installation and over time. Lately, per- and polyfluoroalkyl substances (PFAS), an excessively toxic pollutant which accumulates up the food chain, was found near the site, near Lake Memphremagog. These test results showed a high level of PFAS near an unlined area of the landfill and a lower level adjacent to

and down gradient from a lined area of the landfill. We than can surmise that a portion of the landfill liner is leaking. At a NEWSVT meeting held on September 11, 2018, in Coventry, we were told that it is possible that a portion of the landfill liner is leaking and releasing PFAS to the groundwater, but more tests are required to confirm the origin of the contamination.

Preventing these kinds of toxic contaminants from migrating from the site to Lake Memphremagog is a major concern and it is why we wish that you reconvene the hearing. Because Lake Memphremagog is an important drinking water reservoir, we believe that the facility represents a real and potential danger, that the precaution principle must be applied and that the expansion project of NEWSVT's solid waste disposal plant in Coventry must be denied.

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