

Magog, July 19th, 2018

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To the Vermont Department of Environmental Conservation:

Memphremagog Conservation Inc. (MCI), based in Magog, Québec, is a volunteer organization that has been operating for more than 50 years with a membership of over 600 households. Our mission is to protect the health of the waters and watershed of Lake Memphremagog. A few days ago, we found out that the Agency was holding a public consultation regarding a Draft Certification and Fact Sheet issuing to New England Waste Services of Vermont Inc. (NEWSVT) for the landfill facility located in Coventry.

With this letter, MCI wants to express his strong opposition to the expansion of NEWSVT's solid waste disposal plant in Coventry, near Newport.

Operated by Casella Waste Systems, the Coventry landfill site is the largest waste management facility in the State of Vermont. It is located adjacent to Black River, the principal tributary of Lake Memphremagog. Over the years MCI has watched with alarm as 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 footprint expansion of the landfill, which would allow it to bury 500,000 tons a year of waste there, estimated to be the equivalent of 71 000 trucks a year¹, for 22 additional years.

Located as it is upstream from approximately 185,000 people in Quebec who depend on the watershed for drinking water, MCI believes that the facility represents a real and potential danger and should never have been permitted to exist. Casella buries not only municipal solid waste, but sewage sludge, asbestos, ash, and contaminated soil at Coventry Landfill. Municipal solid waste, the waste from homes, businesses and institutions, contains more than 85,000 contaminants, including heavy metals, volatile organic compounds, pharmaceuticals, and other contaminants of emerging concern.

¹ UQAM ESG, Dessau-Soprin inc. & Ville de Montréal (2005). *Le transbordement des matières résiduelles sur l'île de Montréal*. Montréal, 48 p. + Annexes.
https://ville.montreal.qc.ca/pls/portal/docs/PAGE/ENVIRO_FR/MEDIA/DOCUMENTS/15.transbordement_mat_residuelles_1.PDF

The proposed Coventry Landfill expansion would be required to have a two liner composite system. The liners often develop holes during installation, and they develop holes and stress cracks over time. Because Lake Memphremagog is a drinking water reservoir, MCI believes that the precaution principle must be applied. The last landfill on the Canadian side of Lake Memphremagog watershed closed many years ago. If Lake Memphremagog was recognized as a drinking water reservoir by the Government of Vermont, the establishment of new Waste management zones would be prohibited following the Vermont Water Quality Standards².

MCI also asks for a stop to the treatment of the leachate from the site at the Newport sewage wastewater plant. The Newport wastewater treatment plant was designed to treat municipal wastewater, not landfill leachate. The last Whole Effluent Toxicity (WET) Test required at the Newport plant outlet was in 2008 and Casella has treated leachate at the plant since 2009. The WET test is used in Vermont and Quebec wastewater treatment plants to determine whether a wastewater discharge will have toxic effects on the organisms in the receiving water. The fate of leachate contaminants throughout the wastewater treatment process and the cumulative effects in Lake Memphremagog are unknown. If Lake Memphremagog was recognized as a drinking water reservoir by the Government of Vermont, the discharge of wastes would be prohibited regardless of the degree of treatment provided following the Vermont Water Quality Standards³.

Also, the water quality of the Lake has not improved over the last decade and with more than 4000 boats on the Lake, the construction of many golf clubs and residential developments, Lake Memphremagog continues to be sensitive to anthropogenic pollution.

In closing, we reiterate our strong opposition to the expansion of NEWSVT's solid waste disposal plant in Coventry, to the leachate treatment in Newport's wastewater plant, and our desire to see Lake Memphremagog be recognized by Vermont as a drinking water reservoir, even though all drinking water intakes are located on the Canadian side of the border.

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²Vermont Water Quality Standards / Environmental Protection Rule Chapter 29(a) / 2017, p. 17.

³Vermont Water Quality Standards / Environmental Protection Rule Chapter 29(a) / 2017, p. 13.