

DUMP, LLC
“Don’t Undermine Memphremagog’s Purity”
PO Box 1402
Newport, Vermont 05855

April 8, 2022

Julie Moore, Secretary
Agency of Natural Resources
1 National Life Drive
Davis 2
Montpelier Vermont 05620-3901

RE: Petition for Declaratory Ruling
Applicability of Provisions of 10 VSA Chapter 47 and Related ANR Rules to Flows from
Underdrain #3 at NEWSVT, Inc Landfill, Town of Coventry

Dear Secretary Moore:

This letter is a Petition for a Declaratory Ruling, pursuant to 3 VSA 808, regarding the applicability of the provisions of 10 VSA Chapter 47 and related Agency of Natural Resources (ANR) Rules to existing flows from underdrain #3 (UD#3) at the NEWSVT, Inc landfill operation in the Town of Coventry as well as the flows from a PFAS treatment system proposed for construction at the outlet of the underdrain.

The Petitioner contends that the pollutant laden flows from UD#3 constitute a “discharge” from a point source and require a NPDES Discharge Permit.

This Petition is filed by “Don’t Undermine Memphremagog’s Purity”, LLC (DUMP). DUMP was formed in 2018 and has approximately 130 members, most of whom reside in the Lake Memphremagog basin. DUMP’s mission is to restore and protect the water quality of the Lake Memphremagog watershed in Vermont and related international waters.

DUMP and its members have participated in several permitting processes administered by the Department of Environmental Conservation (DEC) concerning the landfill operation as well as related proceedings before the District 7 Environmental Commission. DUMP believes it has standing as a “person” to file a Petition acting on behalf of its membership. Alternatively, and to the extent necessary, the four DUMP members who have co-signed this Petition make the request as “persons” under 3 VSA 808. While there are flows emanating from other underdrains and associated infrastructure at the landfill, this Petition is limited to the facts presented for the UD#3 flows. DUMP does not waive filing a subsequent Petition(s) with respect to the applicability of the provisions of 10 VSA Chapter 47 and related rules to the other flows.

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FACTS

1-NEWSVT, Inc. operates a landfill involving 128 acres of a 1,056 acre tract located off Landfill Lane Road in the Town of Coventry. At the closest points, the landfill footprints are approximately 700 feet (unlined area) and 1,056 feet (outlet of underdrain for lined phase 3) from the Black River. At its closest point, the landfill is approximately 2,300 feet from the shoreline of the South Bay of the Lake, although at times construction on landfill components has been as close as 350 feet to the lake. (Exhibits 7, and 15)

2-A landfill has been operated on this tract by various entities since 1970. The approximate footprint of that operation is depicted on the “site sampling location map” plan included in a report dated August 10, 1989 prepared for the Environmental Protection Agency by the NUS Corporation. (Exhibit 1)

3-New England Waste Services of Vermont, Inc (NEWSVT), a subsidiary of Casella Waste Systems, Inc), assumed ownership of the tract in 1996 and continued operation of a landfill facility. (Exhibit 18)

4-Over time, NEWSVT, Inc received requisite approvals from the DEC for the construction of lined cells at the landfill. Phase 3 of the landfill was authorized in 1999 under the terms of a DEC Solid Waste Certification. This Certification approved the construction of infrastructure, including the underdrain system beneath the cells. Although it was known that the underdrain piping would collect and release flows, the DEC did not require any review or permitting under the NPDES provisions of 10 VSA Chapter 47. (Exhibit 2)

5-Phase 3 was constructed in 1998-1999 and commenced operation in 1999. The footprint of Phase 3, adjacent cells and related infrastructure are depicted on plans by Sanborn and Head, Inc as were filed with the DEC for purposes of permitting.(Exhibits 5,7 and 19)

6-The DEC indicated as early as 2001 that it considered the flows from the outlet of UD #3 to be “surface water” within the context of the permit processes that the DEC administered. This determination by the DEC was cited in the Waite and Heindel, Inc. “Water Quality and Sampling Analysis of Trends and Standards Exceedances” report dated May 2010 . That determination was confirmed in September 2021.(Exhibit 12)

7-The UD #3 flows have been measured at various times by NEWSVT consultants. The flow was 4,608 gpd in October 2021 during a dry period in the region.(Exhibit 20) Based upon a review of multiple NEWSVT reports, the Petitioner estimates that over time the flows at the UD #3 outlet have ranged from 7,200 to 10,080gpd.

8-The DEC Solid Waste Certifications require ongoing monitoring and sampling of flows from the landfill. The results of this monitoring and sampling are provided in sequential reports filed over time by NEWSVT, Inc.(Exhibit 20)

9-An initial site evaluation entitled “Hydrogeologic Site Characterization Report, Lined Landfill, Phase III” dated February 27, 1997 (revised September 23, 1997) was prepared by Heindel and Noyes, Inc. The most recent report by Waite and Heindel, Inc is dated January 14, 2022 and it provides the sampling results from October 2021, an analysis of trends and identifies flows whose contaminant levels exceed applicable state standards. (Exhibit 20).

10-The reports provide sampling results from multiple points on the project site. The most pertinent sampling points with respect to the flows from the outlet of UD 3 are MW706, MW703, MWK1 and SW7A. (Exhibits 5,7,19 and 20)

11- The January 2022 Waite and Heindel report indicates exceedances of applicable State standards for arsenic, cadmium and PFAS at UD#3.(Exhibit 20)

12-Even though the DEC considers UD#3 flows to be “surface waters”, it applies the Vermont Groundwater Enforcement Standards for PFAS (five selected PFAS) pollutants because the State has not yet promulgated surface water quality standards for PFAS. The Vermont Groundwater Enforcement Standard for the five pertinent PFAS is 0.02ug/L or 20ppt. As reported by Waite and Heindel in January 2022, the samples collected at the UD#3 outlet between September 19,2019 and October 21, 2021 range from 24 to 77ppt for the five PFAS and 222 to 489ppt for all PFAS tested . (Exhibit 20)

13-In a September 2, 2021 communication from the WMPD of the DEC to NEWSVT, the Division specifically referred to the 73ppt result from the May 2021 sampling results and unspecified 2019 and 2020 results and concluded that the UD#3 flows “consistently reported PFAS above the Vermont Groundwater Enforcement Standards “. (Exhibit 12)

14- The September 2, 2021 WMPD communication required the installation of a PFAS treatment system for UD#3. (Exhibit 12)

15-PFAS have also been detected in the groundwater samples from MW-K1 which is located in a Class 2 wetland buffer. (Exhibit 20)

16- The Vermont Water Quality Standards (for surface waters) for arsenic are 0.02ug/L(Total) and 1.5ug/L(Dissolved)(Protect Human Health) and 340ug/L and 150ug/L(Protect Aquatic Biota). The data collected at UD#3 between March 21, 2018 and October 12, 2021 indicate sample results for arsenic ranging from 2.8 to 5.5ug/L (Total) and 2.9 to 4.4ug/L (Dissolved). (Exhibit 20)

17-The Vermont Water Quality Standards (for surface water) for dissolved cadmium (These are stated in the footnotes in the VWQS) are 0.94ug/L and 0.43ug/L (Protect Aquatic Biota), with no standard shown for Protection of Human Health. The data collected at UD#3 between March 21, 2018 and October 12, 2021 values ranging from 1.69ug/L to 2.00ug/L. (Exhibit 20)

18-The following table prepared by the Petitioner reflects the reported levels of PFAS, arsenic, and cadmium over a number of years from the NEWSVT Semiannual Water Quality reports:

| | | Sum of 5 Detected PFAS Compounds Regulated by VT | Sum of All Detected PFAS Compounds | Total Arsenic Vermont Water Quality Standards (ug/L) | Diss. Cadmium Vermont Water Quality Standards (ug/L) |
|-------------------|----------------------|---|---|---|---|
| Location | Sampling Date | 20 (ng/L) | (ng/L) | 0.02 | 1.48 (calculated) |
| Phase 3 | 9/19/2019 | 24 | 222 | 2.8 | 1.69 |
| Underdrain Outlet | 10/31/2019 | 48 | 330 | 3.8 | 1.73 |
| | 2/6/2020 | 59 | 392 | 4.1 | 1.73 |
| | 5/7/2020 | 77 | 489 | 3.8 | 1.71 |
| | 10/15/2020 | 23 | 226 | 4.1 | 1.75 |
| | 5/10/2021 | 73 | 427 | 5.5 | 1.72 |
| | 10/12/2021 | 27 | 247 | 5.3 | 1.74 |
| | | | | | |

19-Native soils in the region surrounding the landfill contain levels of arsenic. This was first noted in the 1989 NUS Corporation report for the EPA. Sample point MW706 above Phase 3 of the landfill showed levels of arsenic. (Exhibits 1 and 20) Multiple categories of wastes, as well as materials used for fill and other purposes, in Phase 3 have significant arsenic content.

20-While native soils can also contain high levels of cadmium, there is no evidence of background readings of soils in the region surrounding the landfill.

21-Extensive scientific research has determined that the presence of PFAS are now ubiquitous in modern society. However, PFAS are man-made and not a naturally occurring substance. There is no evidence of background readings of PFAS in the native soils in the region surrounding the landfill.

22-As stated above in findings 12 and 13, the PFAS levels at the outlet of UD#3 exceed the State standards.

23-At the request of the DEC on September 19, 2019, NEWSVT began to sample and analyze the flows from UD#3 for PFAS concentrations. In June 2020, NEWSVT proposed to treat the flows from UD#3 for purposes of reducing the concentration of PFAS to meet the groundwater standards. The DEC required the installation of a PFAS treatment system in its September 2, 2021 communication to NEWSVT. (Exhibits 4, 12 and 13)

24-NEWSVT, Inc. filed an application dated December 28, 2021 with the DEC for an amended Solid Waste Certification. The purpose of this application is to seek approval of a PFAS treatment system for the flows from UD #3. (Exhibit 15)

25- The Watershed Management Division of the DEC indicated that a review of the flows from UD #3 would not take place under the statutory and regulatory provisions administered by that

division. Instead, the Division indicated that flows would be evaluated and regulated by the Solid Waste Management and Prevention Division. (Exhibit 13)

26- The site plans and detail sheets prepared by Sanborn and Head, Inc, dated December 2021 and included in the pending solid waste certification amendment application submittals, depict the footprint and related design specifications for the proposed treatment system to be constructed in the buffer of a Class 2 wetland. These plans show that the treatment system will release its flows into the buffer and thence into the wetland. (Exhibits 16 and 17)

27- The wetland in question is described in detail in Sections 4 and 5 of the Wetland Permit application and is a 639 acre wetland complex associated with the Black River and South Bay of Lake Memphremagog. The wetland is identified as a palustrine wetland on the Vermont Significant Wetlands Inventory maps and therefore designated as a Class II wetland under VWR § 4.6. The Tactical Basin Plan for Lake Memphremagog includes a reference that this wetland may be eligible for an upgrade to Class 1. (Exhibits 3 and 21)

28-Following treatment, the flows cited in finding 25 will contain significant levels of arsenic, cadmium and remaining PFAS. These flows will also contain other substances as noted in the reports. While it is presumed that the Phase 3 liners are intact and functioning as designed, nevertheless the underdrain system collects flows from under the industrial land use.

29-The Petitioner has not conducted on site investigations. However, as documented in copious NEWSVT submittals to the DEC, it is noted that multiple varieties of wastes (such as municipal wastewater sludge) disposed in Phase 3 and adjacent phases are laden with PFAS and arsenic content. Sludge has also been used as alternate daily cover material and for internal road construction. The Petitioner contends that it is feasible that flows from the Phase 3 sidewalls, due to leachate breakouts as described in various inspection reports, have carried PFAS into the underdrain.

30-The DEC issued Wetland Permit #2016-067.0 on February 12, 2021. That permit authorized, among other things, an intrusion into the wetland buffer in the proximity of underdrain #3 for purposes of construction of a PFAS treatment system. The details of the treatment system as was then proposed were not depicted on any plans filed with the wetland permit application. The only plan included in the wetland application submittals was a very generalized "Wetland Buffer Impact Plan". The only details for the proposed construction of improvements in the wetland buffer are included in a brief narrative in sections 17 and 18 of the application form. (Exhibits 3 and 11)*

*The Petitioner is aware that NEWSVT had already developed a conceptual plan and related design plans for the UD#3 treatment system by June 2020 . Thus, these plans were the design intended by the NEWSVT when the Wetland Permit was issued in February 2021. The plans subsequently prepared by Sanborn and Head Inc. dated December 2021 in the submittals in the pending solid waste certification application depict a different design and footprint in the wetland buffer. The petitioner contends that the Wetland Permit cannot be considered valid for the approval of the treatment system because 1) the content of the flows into the wetland buffer and wetland were not considered and 2) the design of the project in 2020 is not the design now before the WMPD for review and approval.

31-The Wetland Permit application submittals discuss stormwater discharge permitting but the submittals are silent on the content of the flows from UD#3 which will be released into the wetland buffer and the wetland. The findings in the Wetland Permit include no facts regarding the pollutants in the flows which are currently released into the wetland buffer and wetland and flows that will be released from the treatment system. (Exhibits 3 and 11)

32- The wetland is hydrologically linked to the Black River. The Black River is class B-2 waters pursuant to the Vermont Water Quality Standards.

33-The Basin 17 Lake Memphremagog, Tomifobia and Coaticook TACTICAL BASIN PLAN describes the existing uses of the Black River as including waters that are suitable for swimming and other primary contact recreation, such as boating and fishing. The existing uses also include aquatic biota, habitat and aesthetic values. The Black River flows through extensive wetlands into Lake Memphremagog which is used as a potable drinking water source by 175,000 Canadians. (Exhibit 21)

34-As of October 2021, no division within the DEC had issued a jurisdictional Project Review Sheet for the PFAS treatment project indicating in a comprehensive manner in which permit reviews would be required. An amended land use permit is required under 10 VSA Chapter 151. The applicant indicated on the Schedule B in the pending Act 250 application the DEC permits it believes are necessary for the project; a NPDES Discharge Permit is not included in the NEWSVT material representations.(Exhibits 14 and 18)

35-On February 9, 2022 by means of electronic communication, DUMP asked the Watershed Management Division of the DEC why the UD#3 flows did not constitute a “discharge” pursuant to 10 VSA 1251(3) and thus require a NPDES permit consistent with 10 VSA 1263. The Division did not provide a response to this inquiry.

APPLICABLE STATUTORY AND REGULATORY PROVISIONS

The State of Vermont water quality policy is set out in 10 VSA 1250:

It is the policy of the State of Vermont to:

- (1) protect and enhance the quality, character and usefulness of its surface waters and to assure the public health;*
- (2) maintain the purity of drinking water;*
- (3) control the discharge of wastes to the waters of the State, prevent degradation of high quality waters and prevent, abate or control all activities harmful to water quality;*
- (4) assure the maintenance of water quality necessary to sustain existing aquatic communities;*

(5) provide clear, consistent, and enforceable standards for the permitting and management of discharges;

(6) protect from risk and preserve in their natural state certain high quality waters, including fragile high-altitude waters, and the ecosystems they sustain;

(7) manage the waters of the State to promote a healthy and prosperous agricultural community; to increase the opportunities for use of the State's forest, park, and recreational facilities; and to allow beneficial and environmentally sound development; and

(8) seek over the long term to upgrade the quality of waters and to reduce existing risks to water quality

The provisions in 10 VSA 1251 provide the definitions of terms used in Chapter 47 "Water Pollution Control" of that Title. The definitions of terms relevant to this petition are:

3) "Discharge" means the placing, depositing, or emission of any wastes, directly or indirectly, into an injection well or into the waters of the State.

9) "Public interest" means that which is for the greatest benefit to the people of the State as determined by the standards set forth in subsection 1253(e) of this title.

and

(13) "Waters" includes all rivers, streams, creeks, brooks, reservoirs, ponds, lakes, springs, and all bodies of surface waters, artificial or natural, that are contained within, flow through, or border upon the State or any portion of it.

State law prohibits the discharge by any person of any waste or substance into waters of the State without first obtaining a permit for that discharge from the Secretary. 10 VSA 1259(c).

Any person who intends to discharge waste into the waters of the State must make application to the Secretary for a discharge permit. 10 VSA 1263(a). The statute indicates that the Secretary shall issue a permit "containing terms and conditions to carry out the purposes of Chapter 47 and of applicable federal law":

If the Secretary determines that the proposed discharge will not reduce the quality of the receiving waters below the classification established for them and will not violate any applicable provisions of State or federal laws or regulations... 10 VSA 1263(c)

The DEC promulgated the Vermont Water Pollution Control Permit Regulations (VWPCPR) on January 17, 1974 to administer the Discharge Permit program. These rules were amended in 1991 for the administration of "General Permits". The Petitioner contends that the "individual permit" provisions [Rule 13.12(A)(3)] apply to the UD#3 flows and that the UD#3 flows do not qualify as "stormwater runoff" under Rule 13.12(A)(7).

VWPCR 13.1 provides the definitions of applicable terms such as “NPDES” permits [Rule 31.1(h)]. Rule 13.1(q) incorporates by reference the definitions of terms stated in federal law and codified in 33 USC 1362 and the most relevant definitions from 33 USC 1362 are:

(6) “Pollutant” means dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water....

(14) “Point Source” means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged

(19) “Pollution” means the man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water.

10 VSA Chapter 37 provides the Vermont statutory provisions regarding Wetlands Protection and Water Resources Management. The overarching state policy is stated in 10 VSA 901:

It is hereby declared to be the policy of the State that the water resources of the State shall be protected, regulated and, where necessary, controlled under authority of the State in the public interest and to promote the general welfare.

“Waters” are defined in 10 VSA 902(3) as *“any and all rivers, streams, brooks, creeks, lakes, ponds, or stored water, and groundwaters, excluding municipal and farm water supplies.”* and “water resources” are defined in (4) as *“the waters and the values inherent or potential in waters and their uses”*.

The provisions of 10 VSA 913(a) prohibit a person from conducting any activity in a significant wetland or its buffer without a permit issued in accordance with 10 VSA Chapter 37 and related Vermont Wetland Rules.

The State of Vermont has promulgated a policy intended to ensure the “antidegradation” of the quality of surface waters.* The “antidegradation policy” is included in Chapter 29A of the Environmental Protection Rules; these are the Vermont Water Quality Standards. The “antidegradation policy” is Rule 29A-105 and its initial provisions read:

(a)General. All waters shall be managed in accordance with these rules to protect, maintain, and improve water quality.

and

(b) Protection and Determination of Existing Uses. Existing uses of waters and the level of water quality necessary to protect those existing uses shall be maintained and protected regardless of the water’s classification. Determinations of what constitute existing uses of particular waters shall be made either during the basin planning process or on a case-by-case basis during consideration of an application. The use of waters to receive or transport discharges of waste shall not constitute an existing use for purposes of these rules...

It is important to note that the classification of waters in Vermont explicitly require that the Secretary of ANR consider, among other factors, the effect on the “public interest” pursuant to 10 VSA 1263(e :

(e) In determining the question of public interest, the Secretary shall give due consideration to, and explain his or her decision with respect to, the following:

(1) existing and obtainable water qualities;

(2) existing and potential use of waters as a public water source, recreational, agricultural, industrial, and other legitimate purposes;

(3) natural sources of pollution;

(4) public and private pollution sources and the alternative means of abating the same;

(5) consistency with the State water quality policy established in section 1250 of this title;

(6) suitability of waters as habitat for fish, aquatic life, and wildlife;

*Petitioner is aware of Act 64 of the 2015 legislative session [Codified 10 VSA 1251a(c)] in which the General Assembly directed the Secretary of the ANR to adopt by rule an “implementation process” for the antidegradation policy. The Secretary was to ensure that implementation process will apply to all new discharges that require a permit. Even though the Chapter29A rules posted on the DEC web site have an effective date of January 15, 2017 it is unclear to the Petitioner if the rules satisfy the requirements of Act 64; Petitioner was unable to discern action by ANR after passage of Act 64 consistent with the Vermont Administrative Procedure Act and then review of a promulgated implementation process by the Legislative Committee on Administrative Rules.

(7) need for and use of minimum streamflow requirements;

(8) federal requirements for classification and management of waters;

(9) consistency with applicable municipal, regional, and State plans; and

(10) any other factors relevant to determine the maximum beneficial use and enjoyment of waters.

CONCLUSIONS

Applying the legal authorities cited above to the facts relevant to the existing flows from UD#3 at the NEWSVT landfill, and the flows from the proposed UD#3 PFAS treatment system, it is an inescapable and unequivocal conclusion that a NPDES Discharge Permit has been, and will be, required for the flows which constitute “discharges” under both federal and state law.

As depicted on the Sanborn and Head Inc site plans and detail sheets, the existing construction of improvements that constitute the Phase 3 underdrain system consists of piping and other components that lead to the UD#3 outlet. This existing infrastructure is a “discernible, confined and discrete conveyance” meeting the definition of a “point source” in 33 USC 1362(14).

The design for the proposed PFAS treatment system, as depicted on Exhibit 17, will also consist of piping and related infrastructure culminating in a swale to be constructed in the wetland buffer and directed into the wetland buffer. The treatment system will also meet the definition of a “point source” in 33 USC 1362(14).

The flows out of UD#3 have been designated “surface waters” by the DEC. These “surface waters” are directed to the “waters” of a Class 2 wetland via its buffer. The “waters” of the wetland flow into the “waters” of the Black River which then flow into the “waters” of Lake Memphremagog -all being “waters of the State.” The UD#3 flows are inconsistent with the existing uses of the receiving waters.

As well documented in the NEWSVT reports, the content of the UD#3 flows include contaminants, three of which exceed applicable state standards. These flows meet the tests of “pollutant” and “pollution” set out in 33 USC 1362(6) and (19), respectively.

The Phase 3 underdrain system results in a discharge from the UD#3 outlet which is a “discharge” pursuant to 10 VSA 1251(3).

The UD#3 “discharge” is inconsistent with Vermont water quality policy requiring the protection and enhancement of the quality of surface waters. The “discharge” is inconsistent with the State’s “antidegradation policy” because the content of the “discharge” is in conflict with the existing use of the receiving “waters” and the level of quality necessary to protect these existing uses.

Viewed in the totality of all available facts, the unpermitted “discharge” from UD#3 is contrary to the “public interest”.

In closing, DUMP further contends that an UD#3 PFAS treatment system project cannot be allowed to be an incremental step toward a larger pretreatment system on the landfill site. Moreover, while VWPCPCR 13.1(w) anticipates “minor discharges”, the Petitioner submits that this provision does not apply to the NEWSVT UD#3 discharge because of the combined discharges from multiple underdrains and other infrastructure on the tract. In addition to raising this concern about a possible improper incremental or fragmented approach by DEC permitting, the Petitioner intends to pursue the issue of “larger undertaking” in related 10 VSA Chapter 151 proceedings consistent with RE: Bruce J. Levinsky Declaratory Ruling 157: August 8, 1984.

Therefore, DUMP petitions the Secretary of the ANR to issue a jurisdictional Declaratory Ruling under the authority of 3 VSA 808 concluding that the applicable provisions of 10 VSA Chapter 47 and related rules require that NEWSVT must file an application for a NPDES Discharge Permit for the discharges from UD#3 and that such an application must be filed in an expedited manner. Likewise, DUMP petitions the Secretary of the ANR to require that NEWSVT must file an application for a NPDES Discharge Permit for the discharges from its proposed PFAS treatment system for the discharges from UD#3.*

Respectfully,

Henry Coe
Teresa Gerade
Ed Stanak
Margaret Stevens
On behalf of the DUMP Advisory Committee

*DUMP wants to be clear in stating that it supports the treatment and removal of PFAS from the discharges from the landfill underdrains and other infrastructure. Having said that, the public process for the review of an application for a NPDES Discharge Permit will be the proper forum for DUMP to present its positions regarding the appropriate location of a treatment system and the disposal of landfill leachate and PFAS residuals in a manner that is both environmentally just and consistent with applicable federal and state statutory and regulatory provisions.

CC's: see final page

Exhibit List

- 1- NUS Corporation Final Screening Site Inspection Report to EPA August 10,1989
- 2- Phase 3 Solid Waste Certification #?
- 3- Wetland Permit Application # X Submittals 2020
- 4- Sanborn and Head Inc UD#3 PFAS System Conceptual Design Memo June 4,2020
- 5- Sanborn &Head Groundwater Compliance Boundaries Site Plan September 2018
- 6- Waite and Heindel May 2010 Water Quality Sampling Results and Analysis May 2010
- 7- Sanborn&Head Environmental Monitoring Site Plan June 2020
- 8- S&H UD#3 PFAS System. Overall Plan June 2020
- 9- S&H UD#3 PFAS System Site Plan June 2020
- 10- S&H Wetland Buffer Impact Site Plan January 5, 2021
- 11- Wetland Permit # X February 19, 2021
- 12- WMPD Staff Letter to NEWSVT Requiring UD#3 PFAs System September 2, 2021
- 13- NEWSVT Letter to WMPD re *inter alia* DEC Determination on No Requirement for Discharge Permit September 21,2021
- 14- Email District 7 Coordinator to DEC Staff re PRS & Jurisdiction October 6, 2021
- 15- NEWSVT Application for Amended Solid Waste Certification for UD#3 PFAS System December 31, 2021
- 16- S&H UD#3 PFAS System. Overall Plan December 2021
- 17- S&H UD#3 PFAS System Site Plan December 2021
- 18- NEWSVT Application 7R0841-14 for Amended Land Use Permit: Schedule B December 31, 2021
- 19- S&H Surficial Groundwater Elevations and Flow Directions Site Plan January 11,2022
- 20- Waite and Heindel October 2021 Water Quality Sampling Results and Analysis January 14, 2022
- 21- Basin 17 : Lake Memphremagog, Tomifobia and Caticook TACTiCAL BASIN PLAN 2017

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