

NO Gardner Sludge Landfill Expansion

Dec. 2024 (Update)

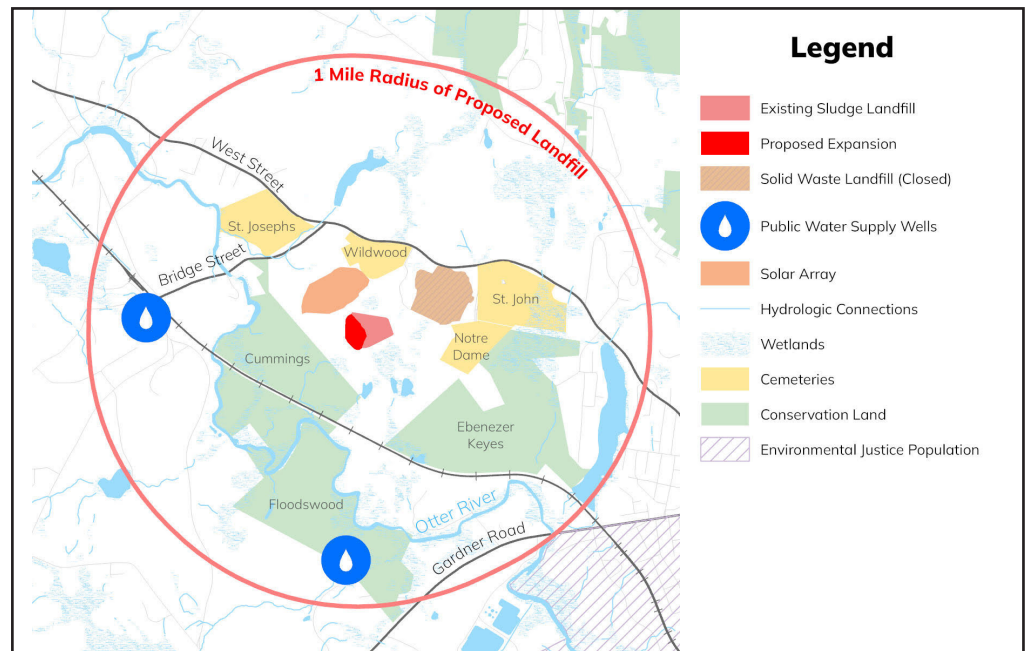
Prepared by Millers River Watershed Council, Inc. and the Coalition For a Sustainable Alternative to the Gardner Sludge Landfill Expansion—for more details go to: <https://millerswatershed.org/gardner-landfill/>

1. Overview

- The City of Gardner is planning to construct a 4.3-acre expansion to the Sludge Landfill (SLF) in the Wildwood Cemetery Forest off West Street in Gardner. This is a 72% increase in the size of the existing 6.0-acre landfill that currently rises 50 feet above the surrounding area—see map.

- This expansion is only a temporary solution to managing the City's waste-water sludge for a period of 17 years, but the sludge will remain at the site forever. So will the threat to nearby public and private drinking water wells (see map) from liner leakage, which is common to most landfills over time.

- The SLF expansion is also expensive and will destroy sensitive environmental resources that currently benefit everyone. Gardner residents and sewer rate-payers deserve a better solution from — and for— their City!



Prepared by Mount Grace Land Conservation Trust

- In February 2023, the Massachusetts Environmental Protection Act (MEPA) office determined that this project requires submission of a Draft Environmental Impact Report (DEIR).

2. Threatens Drinking Water

- The geology of the site has glacial outwash and fractured and weathered bedrock which does not provide any natural containment for leachate leakage to groundwater. 71 private wells in Gardner and Templeton, as well as Templeton's Otter River and Sawyer Street public wells, are within a mile.

- The area to the south and southeast of the expansion has many interconnected wetlands, spring-fed ponds, and streams that flow through City owned (Cummings) and privately owned (Ebenezer Keyes) Conservation Areas on their way to the Otter River. Any sludge landfill contamination of surface or ground water will likely impact these vital water bodies. **In June 2024, 1,4-dioxane (EPA classified as likely to be carcinogenic to humans) contamination was found in four on-site monitoring wells and an off-site pond (1,200 feet south of the site).**

- Erosion wash-out incidents at the existing SLF, from 2020 to 2024, resulted in landfill material exiting an outfall pipe near "Wetland D." **Enforcement orders issued by Gardner Conservation Commission.**

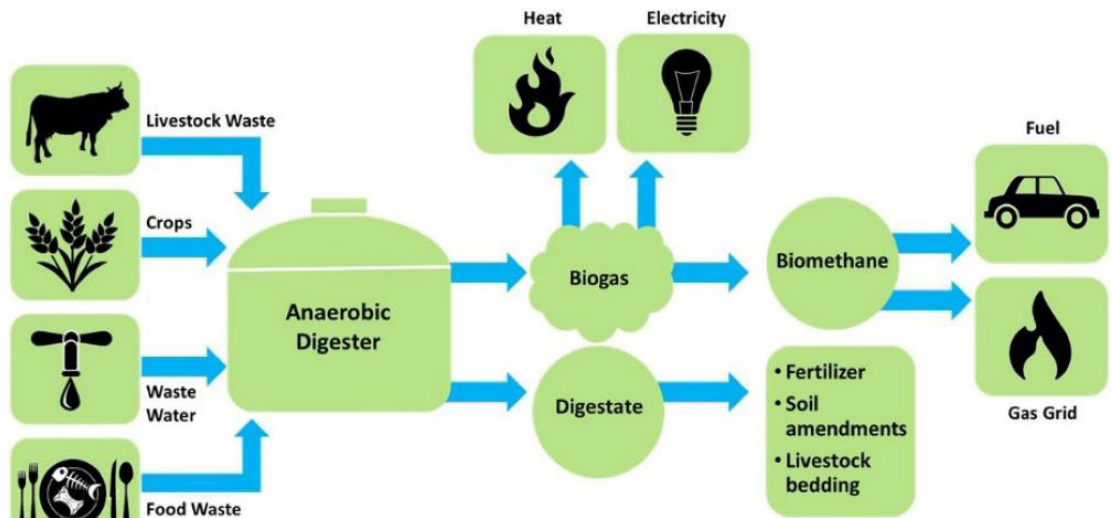
- The City has no plan or procedure to restore water resources in the event of system failure and contamination in 1, 5, 10, 25, or 100 years. That's because contaminated water resources are almost impossible to restore.

3. Better Alternatives Exist

- Overall expansion cost is estimated at \$9,040,000 to \$10,340,000.
 - \$1,080,000 - Engineering & Permitting
 - \$6,260,000 - Expansion Construction
 - \$1,700,000 to \$3,000,000 - Closure Construction Cost (for expansion area only)

Note: The above costs do not include construction financing or \$983,247 of post-closure monitoring for 30 years (based on 2021 dollars).

- According to the 2018 MA Sludge Survey, only 18% of the state's wastewater sludge was sent to landfills. The other 82% was incinerated or applied to soils.
- No other MA city or town is trying to create or expand a sludge landfill.
- Fitchburg MA is working on an privately run Anaerobic Digestion solution that recycles sludge and generates revenue. **The project has established a permitting pathway and is working on financing options.**



Anaerobic digestion process -- from Environmental and Energy Study Institute

- In March 2023, SoMax Circular Solutions provided Gardner with a feasibility study for a Hydrothermal Carbonization (HTC) waste-to-energy solution that provides a return-on-investment. City leaders have taken no action to follow-up on the recommendations in the study. **In January 2024, Gardner Clean Air hosted a public presentation on the SoMax Study. Presentation is available for viewing on You Tube.**
- Instead, the City's expansion plan rejects a phased gradual approach to construction in favor of a build-it-all at once strategy the locks in sludge dumping for another 17 years.

4. Environmental Destruction and Poor Air Quality

- The SLF expansion will destroy six acres of Gardners natural resources, including a hardwood forest, wildlife habitat, and a geologically important esker in the Wildwood Cemetery Forest.
- This expansion is inconsistent with the City's own Forest Management Plan (2012) that has the following stated goals: "The City of Gardner would like to improve and protect the forest resources on the Wildwood Cemetery property for the benefit of the residents of Gardner. Protecting water quality is a high priority. Maintaining and improving aesthetics near the Cemetery is extremely important as well."
- Persistent odors emanating from the existing sludge landfill negatively affect visitors to the abutting cemeter-ies and the recreational use of the nearby Conservation Areas. These odors impact Gardner residents, including the City's large Environmental Justice (EJ) community.

Coalition members: Athol Bird and Nature Club, Clean Water Action, Connecticut River Conservancy, Gardner Clean Air, MassPIRG, Massachusetts Rivers Alliance, Millers River Watershed Council, Mount Grace Land Conservation Trust and North County Land Trust; technical support provided by The Sierra Club.