



## *Town of Sturbridge*

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Shaun A. Suhoski, Town Administrator  
Email: [ssuhoski@town.sturbridge.ma.us](mailto:ssuhoski@town.sturbridge.ma.us)

VIA EMAIL TO: [mDEP.CentralRegion@state.ma.us](mailto:mDEP.CentralRegion@state.ma.us)  
AND FIRST CLASS MAIL

January 11, 2012

Ms. D. Lynne Welsh, Acting Section Chief  
Solid Waste Management Program  
MassDEP – Central Regional Office  
627 Main Street  
Worcester, MA 01608

**RE: Comments on Issuance of Provisional Permit  
CERO – SWM – Southbridge Landfill  
Transmittal Number: X239694 (Waste Volume Increase)**

Dear Ms. Welsh:

These comments are submitted for MassDEP's consideration in respect of the above provisional permit issued on December 9, 2011.

"Minor Modification" – Major Impact

Currently, the landfill is allowed to accept no more than 180,960 tons per year (tpy) municipal solid waste (MSW) and construction and demolition residuals (C&D) without respect to geographic origin or regulated allocation between the classes of waste. This amount, in itself, represented a 725 percent increase over the prior limit of 24,960 tpy of MSW generated solely within the Town of Southbridge.

The current application would increase the annual amount of waste that can be accepted to 300,000 tpy "of any combination of C&D residuals and MSW from residential, commercial and industrial sources without regard to geographic origin." This represents an additional increase of nearly 120,000 tons per year (65.8 percent) of waste stream that will travel through local communities and decompose in an ever-growing landfill less than a half-mile from the borders of the Town of Sturbridge.

These are hardly "minor" modifications.

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Town Hall, 308 Main Street  
Sturbridge, MA 01566-1078

Telephone (508) 347-2500  
Fax (508) 347-5886

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The potential negative impacts to residents in the town of Sturbridge from this "major" increase in MSW are many:

- Potentially substantial increase of trash-hauling vehicles on local roads due to unrestricted geographical bounds on MSW
- Increased potential for birdstrikes on aircraft utilizing the abutting Southbridge Municipal Airport
- Higher-strength and volume of leachate that could escape the landfill and threaten groundwater, thus posing increased danger to public health, safety and the environment to residents in Southbridge and Sturbridge
- Increased likelihood of nuisance odors to abutting residential neighborhoods in Sturbridge

In addition to the General Permit Conditions included in MassDEP's provisions permit, I would request the following additional measures be required:

**Condition G: Annual Report.** That Southbridge Recycling and Disposal Park, Inc. be required to concurrently file a copy of the annual report provided to MassDEP with the Sturbridge Board of Health, 301 Main Street, Sturbridge, MA 01566 no later than the 15<sup>th</sup> day of February of each calendar year.

**Condition L: Financial Assurance Mechanism.** That this requirement be expanded to include establishment of a sufficient surety bond or escrow account to compensate private or public entities for potential harm suffered due to landfill operations or environmental releases.

**Condition U: Reporting.** That Southbridge Recycling and Disposal Park, Inc. be required to concurrently file a copy of the monthly operations report provided to MassDEP with the Sturbridge Board of Health, 301 Main Street, Sturbridge, MA 01566 no later than the 15<sup>th</sup> day of the following month.

**Condition V: Other Requirements.** That Southbridge Recycling and Disposal Park, Inc. be required to adhere to routing all hauler traffic to Route 169 and make every reasonable effort to ensure same is followed by its agents and vendors.

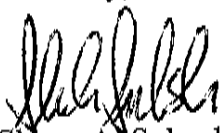
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The Southbridge Recycling and Disposal Park is a major facility in close proximity to a residential neighborhood in Sturbridge.

There remains potential for odor, leachate and traffic impacts upon the community and the imposition of the above requested surety and reporting mechanisms represent, in my opinion, a "minor modification" of the provisional permit requested.

Please call me at 508-347-2500, or email [ssuhoski@town.sturbridge.ma.us](mailto:ssuhoski@town.sturbridge.ma.us) with any questions concerning these comments. Thank you for your consideration.

Sincerely,



Shaun A. Suhoski  
Town Administrator

cc: Sturbridge Board of Health  
Sturbridge Board of Selectmen  
Southbridge Board of Health  
Southbridge Town Manager