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Alternatives to Gardner's proposed sludge landfill expansion are looking better than ever

Following the Commonwealth's February 14th decision requiring the City of Gardner to submit a detailed Environmental Impact Report (EIR) for its proposed sludge landfill expansion on West Street, several promising alternatives continue to take shape that challenge the City's contention that the expansion remains its best and most economical option.

The City contracted with SoMax Circular Solutions for a Feasibility Study on the potential for converting its sludge waste into energy by constructing a Hydrothermal Carbonization (HTC) facility. The City received the full study on March 7th, followed by an executive summary on April 27th. The study "assessed the biosolids generated at Gardner's wastewater treatment plant as a viable feedstock for HTC," including the benefits of adding other organic waste streams, like food waste. It also "analyzed the solid product of HTC, known as Hydrochar, for energy production."

The study found that by taking advantage of federal tax credits from the Inflation Reduction Act (IRA), the City could potentially recoup the cost of investment in 5-10 years, after which it would be profitable. "This is great news for Gardner," said Ivan Ussach, director of the Millers River Watershed Council, which organized the *Coalition for a Sustainable Alternative to the Gardner Sludge Landfill Expansion*. "It appears feasible that Gardner could completely eliminate the need for the landfill expansion and make some money to boot, which should please the folks in City Hall," he said.

Also moving forward are nearby Fitchburg's efforts to convert their West Fitchburg Treatment plant to a facility for processing biosolids anaerobically--without oxygen. Fitchburg is currently in the process of obtaining State permits, and according to Mark McNamara, Fitchburg's Deputy Commissioner of Wastewater, if all goes well, Fitchburg expects to break ground by the end of this year and be online by late 2025. The City of Fitchburg has just signed a construction contract with Rollstone Renewable Energy, a new entity created for this project in partnership with EQ Renewables and Synagrow.

"Fitchburg is to be commended for working hard to make this project a reality," Ussach said. "It will also be a big plus for surrounding communities who would like to participate by bringing in their sludge waste, so this may prove to be an easier, and less-costly, lift for Gardner than other sludge management options," he added.

In a further development, the Mass. Department of Environmental Protection (MADEP) conducted a site visit on April 3rd as part of its review of an appeal to MADEP brought by a Gardner Ten Resident Group challenging the a wetlands permit issued by the Gardner Conservation Commission for the landfill expansion, which the appeal contends it did without sufficiently considering several significant environmental factors. MADEP will be reviewing all of the documentation and requesting additional information from the City about the project. MADEP cannot issue its decision on the appeal until after the completion of the Massachusetts Environmental Policy Act (MEPA) process, which includes a ruling on the EIR to be submitted by the City.

Against all this activity, the City is grappling with the \$307,000 price tag its engineering consultant, Woodard & Curran says it will cost just to prepare the EIR. As for actual construction costs, Woodard & Curran provided Dane Arnold, Gardner's Director of Public Works, with a cost estimate of \$6,260,000 in April. That figure is on top of the EIR's preparation, and does not include the \$573,000 already paid to Woodard & Curran for engineering work or the approximately \$200,000 paid to its previous engineering consultant.

Most importantly, it does not include capping costs for either the proposed expansion, which Woodard & Curran estimated in their 2022 Engineering Report as follows: "Assuming an inflation rate from the past 20-years holds for the next 20 years, the closure cost would increase by 56%, or would be in the range of \$1.7 million to \$3.0 million for the 4.3-acre expansion (and \$4.4 million to \$7.9 million for the entire landfill.)"

"With numbers like that, I can only hope the City is taking a very close look at these alternatives," said Alan Rousseau of Gardner Clean Air, a Coalition member. "That's the great thing about the EIR--they're going to have to take these opportunities seriously," he added.

"North County Land Trust worked closely with the City of Gardner and sisters Patricia Smith and Mary Jane Rodecki to save the Cummings Conservation Area adjacent to the existing sludge landfill site," said Anna Wilkins, the land trust's executive director. "The area that would be destroyed in the expansion would adversely impact the conservation area, hydrology, vernal pool habitats, and surrounding neighborhoods. It's great the city is looking at alternatives, and that the alternatives are looking better than expansion." North County Land Trust is also a member of the Coalition.