



Josh Arneson <jarneson@richmondvt.gov>

CSWD Biosolids Agreement Meeting

Josh Tyler <jtyler@cswd.net>

Fri, Mar 10, 2023 at 1:14 PM

To: "mdow@burlingtonvt.gov" <mdow@burlingtonvt.gov>, "Chris Robinson - Shelburne (crobinson@shelburnevt.org)" <crobinson@shelburnevt.org>, "TElwood@miltonvt.gov" <telwood@miltonvt.gov>, Chelsea Mandigo <chelsea@essexjunction.org>, Bob Fischer <bfischer@southburlingtonvt.gov>, Josh Arneson <jarneson@richmondvt.gov>, Allen Carpenter <acarpenter@richmondvt.gov>, Arthur Garrison <AGarrison@essexjunction.org>

More information from Eamon, regarding the US sludge moratorium in Quebec.

It looks like a virtual meeting Friday the 17th at 1:00 will work – I will be sending out a teams meeting invite shortly

Josh

From: Twohig, Eamon

Sent: Friday, March 10, 2023 11:51 AM

To: Fehrs, Jeff <Jeff.Fehrs@vermont.gov>; Claudon, Lynnette <Lynnette.Claudon@vermont.gov>; Polaczyk, Amy <Amy.Polaczyk@vermont.gov>; Kamman, Neil <Neil.Kamman@vermont.gov>; Blatt, Eric <Eric.Blatt@vermont.gov>; Bergeron, Roger <Roger.Bergeron@vermont.gov>

Cc: Douglas, Bruce <Bruce.Douglas@vermont.gov>; Burns, Joshua <Joshua.Burns@vermont.gov>

Subject: RE: Hardwick WWTF - Sludge Removal

Good morning, I spoke with Englobe this morning. The primary challenge Englobe is facing is similar to what US NE states started facing a few years ago... PFAS associated regulatory pressures and farmer's perception of PFAS risks associated with land application.

The Ministry has very recently adopted a moratorium on importing US sludges (wastewater and paper mill) into Quebec for spreading on agricultural fields. I'm not sure when exactly this prohibition went into effect, but from what I can tell, it is in place until the Ministry develops regulations for PFAS in these materials in 2023. https://www.environnement.gouv.qc.ca/matieres/mat_res/fertilisantes/critere/index.htm

The Ministry has been 'threatening' a ban on US imported sludge due to PFAS concerns for months, since media publications by CBC and others painted a picture of 'dirty' US sludge contaminating Canadian fields. A similar article just came out covering the importation of sludge from Maine into New Brunswick—so if and when that shoe drops, that will be very bad for Maine (who banned land application in ME), and the region as a whole.

Englobe manages sludges/biosolids/paper sludge from US and Quebec. With the media attention and resulting prohibition of US sludges for land application, they are finding that farmers are less willing to accept biosolids, in general, including biosolids from Quebec. Farmers are aware of the Ministry's intent to adopt PFAS regulations and of the media reports, so may be waiting until the Ministry produces their regulatory plan/guidance.

With a shrinking and hesitant market for land application/agriculture, Englobe is having outlet/capacity challenges. They can continue to accept sludges from US for composting as long as that compost does not go to Ag uses (so roadside medians, highway, etc), but the compost facilities are full. They do have a land reclamation project (former Asbestos mine) but they seem to be using that sparingly. Ultimately this has resulted in Englobe needing to slow down and or place holds on current projects... and this isn't just Hardwick this is affecting similar lagoon clean out projects throughout the NE.

And all of this is occurring along with a recent halt in sludge disposal at Casella's Juniper Ridge LF in Maine (claiming stability issues) and with the temporary shutdown (I think for unplanned maintenance) of a Synagro-operate sludge incinerator in Rhode Island. Any time one of the major disposal facilities goes offline, it sends ripples through the entire region. I shudder to think what would happen for Vermont WWTFs in Chittenden County if Casella did not renew their contract for the taking all their sludge to NY for processing to biosolids.

Here is a recent article about Maine's sludge management issues:

<https://news.yahoo.com/landfill-operator-tells-lawmakers-temporary-045900105.html>

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