



**Comments in Opposition to the
Amendment Application for License #S-020700-WD-BC-A Continued Acceptance of 81,800
Tons of In-state Municipal Solid Waste (MSW) at Juniper Ridge Landfill (JRL)**

Ryan Parker, Sustainable Maine Policy Advocate

February 28, 2018

Good evening, my name is Ryan Parker. I am the Sustainable Maine Policy Advocate for the Natural Resources Council of Maine, and I appreciate the opportunity to speak in opposition to the proposed Maine Bureau of General Services (BGS) and NEWSME Landfill Operations, LLC (NEWSME) Amendment Application for License #S-020700-WD-BC-A Continued Acceptance of 81,800 Tons of In-state Municipal Solid Waste (MSW) at Juniper Ridge Landfill (JRL).

When the State took ownership of JRL it was intended that no MSW other than bypass would be accepted; and the amendment to accept 81,800 tons was intended to be an emergency response to a sudden closure of the waste-to-energy facility in Biddeford, not a permanent solution. The Maine Department of Environmental Protection (DEP) itself pointed this out in a February 15 letter to the applicants.

NRCM agrees with many of the points and requests for more information outlined in the Department's letter. Those requests can best be summed up by a single sentence in section four of the Department's request for additional information. "It is unclear that there are no other outlets for the MSW." In addition to the Department, some Maine legislators have pointed out that the intent of state ownership of the landfill seems to have been at least partially forgotten. Additionally, there appears to be little, if any, evidence that attempts have been made to reduce the volume or find an alternative disposal method, of MSW.

The Department specifically requests several types of information including, but not limited to:

- Facts and figures providing a compelling argument, or adequate evidence concerning existing disposal capacity in the state,
- Facts and figures providing a compelling argument or adequate evidence concerning disposal capacity outside the state but within similar driving distance to JRL,
- Scientifically based information for the claims about hydrogen sulfide abatement
- Information about why MSW is a good bulking agent for areas that have settled,
- Information about what was done to alleviate these and other problems prior to the temporary license provision.

In addition to these and the other questions asked by the Department and issues raised by legislators during a briefing before, and subsequent letter from, some of those legislators, it is important to remember that, according to the State's Solid Waste Hierarchy, whether or not the MSW in question may be beneficial to the operations of the applicants is not, in and of itself,

grounds for yet another extension with no hope or guarantee of efforts to reduce or realign this waste with the Hierarchy.

NRCM and our 20,000 members and supporters, some of whom live in towns adjacent to or near, the Juniper Ridge Landfill (including Alton, Eddington, Glenburn, Milford, Old Town, Orono, and Stillwater) have a strong interest in protecting the integrity of Maine's Solid Waste Hierarchy and its importance in licensing criteria. Active efforts to adhere to the Hierarchy promote sustainable materials management and could lead to significant long-term advantages, including financial and environmental savings, as well as slowing the fill of available landfill space.

An extension of acceptance of 81,800 tons of MSW into Juniper Ridge Landfill until landfill capacity is reached runs counter to 06-096 C.M.R. Ch. 400, Solid Waste Management Rules: General Provisions, particularly as it pertains to the Solid Waste Hierarchy. Further, this application runs counter to the original intent of the landfill and the original amendment.

NRCM recommends the Department reject this application due to the substantial inadequacies highlighted in DEP's letter to the applicants. At the very least, we join you, and members of the Legislature, in seeking more information from the applicant to justify this seemingly unjustifiable application.

Thank you for your consideration.