



SIERRA CLUB

MAINE CHAPTER

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August 29, 2024

Karen Knuuti
Environmental Specialist
Bureau of Remediation and Waste Management
Maine Department of Environmental Protection
106 Hogan Rd, Suite 6
Bangor ME 04401

Re: Application DEP# S-020700-W5-CV-N: Application for a Determination of Public Benefit Juniper Ridge Landfill Expansion

Dear Specialist Knuuti,

Thank you for the opportunity to comment on the Application DEP # S-0200700-W5-CV-N. Sierra Club Maine, one of 64 chapters nationwide, represents 22,000 members and supporters and has been working to protect Maine's environment for more than forty years.

Sierra Club Maine strongly supports the Penobscot Nation's and the Conservation Law Foundation's comments filed with the Bureau of Remediation and Waste Management on July 31, 2024, including the conclusion that the Application does not meet the necessary criteria for a positive determination.

The Penobscot watershed has been home to the Eastern indigenous community known as penawahpkekeyak (Penobscot) for thousands of years. The Penobscot watershed, the largest in the region, is essential to that culture and livelihood. The source of sustenance for people for millennia, the Penobscot River also is the source of nutrients that feed the many species from the bottom of the food chain to the top, making it possible for human families to survive. Increasingly, we ignore the predominant importance of our waters to the detriment of our residents while providing benefits to out-of-state corporations and their license to pollute.

In addition, we recognize that Juniper Ridge is one of the highest point-source emitters of methane in our state. Enlarging the current area will likely only increase the methane releases of this waste repository site. For those living close to the landfill (some as close as ¼ mile), increased methane pollution is not acceptable. By increasing the landfill size Casella does not address the seriousness of this issue and is counter to our emissions reductions requirements mandated through our Climate Law.

Casella's use of a shuttered papermill's sewage treatment facility to process leachate from their current landfill is already posing serious chemical pollution downstream. Before any further development occurs, the leachate sewage system must be able to handle PFAS and other much more complex sewage to return unpolluted water into the river in its effluent.

Juniper Ridge under Casella's management, along with the glaring loophole created for them to bend our own laws, has allowed the DEP to cast a blind eye on the rapid expansion of Casella's mountain of materials from out-of-state.¹ Maine DEP has allowed our communities to be at risk of losing waste disposal opportunities while supporting detritus from Massachusetts that should be handled within their own territory. Further expansion of the site will not force the constraints required for Casella to manage their waste collection to follow Maine law. They do not provide or require adequate recycling, composting, etc. Similar to highway expansion creating more vehicles on the road and more emissions, building more area to dump out-of-state waste provides no incentive for Casella to reduce voluminous waste streams and stop PFAS pollution.

We can dream of having an environmentally sustainable system in place for Mainers, but it's a pipedream if we do not enforce restrictions and regulations. In particular, the application to expand Casella's footprint at the Juniper Ridge Landfill's waste processing facility should be denied for environmental reasons and because the Penobscot Nation is unduly impacted by the current waste management system. Until Casella's inaction to comply with Maine law is corrected, no further expansion of JRL should be permitted. That they routinely bring vast quantities of waste from Massachusetts which is strictly disallowed is an insult to Maine towns and cities. The Maine Solid Waste Hierarchy and other state laws require compliance. It is long since time to enforce them.

Sincerely,

Becky Bartovics
Executive Committee
Sierra Club Maine

¹ Conservation Law Foundation & Penobscot Nation, letter to Maine DEP, 7/31/24, page 5-8.