

September 18, 2026

Vera Maheu
Project Manager
Soil Materials Management Unit
Remediation and Waste Management
Maine Department of Environmental Protection

Subject: Comment Response Letter
Phase II Landfill Expansion Leachate Management
Juniper Ridge Landfill
NEWSME Landfill Operations, LLC
Old Town, Maine

Dear Vera:

On behalf of NEWSME Landfill Operations, LLC (NEWSME), Sevee & Maher Engineers, Inc. (SME) has prepared this letter in response to the Maine Department of Environmental Protection (MEDEP) memorandum dated September 3, 2026 related to the Juniper Ridge Landfill (JRL) Expansion Phase II Expansion Leachate Management.

The Public Benefit Determination (PBD) for the JRL expansion conditioned the operation of the proposed expansion on the design and installation of a MEDEP-approved system for the treatment of landfill leachate for per- and polyfluoroalkyl substances (PFAS) (PBD, at pp. 38-39.) Casella and SME are in the process of working with MEDEP to fulfill this condition as required under the PBD. SME and Casella recognize that as a condition of approval of the PBD, the PFAS treatment system, wherever it is located, must be operating and treating leachate from the JRL prior to operation of the Phase II Expansion.

The MEDEP requested additional information regarding leachate management after expansion in the above referenced letter. Please see below details regarding the anticipated system. While we have endeavored to provide as much information as possible, please note that the system design is not yet final. We anticipate filing for the appropriate regulatory approvals in December or January. As you know, Casella previously conducted two pilot projects to aid in the selection of the technology and design of the leachate PFAS treatment system. Both the initial proposal and subsequent reports for the pilot projects were reviewed by the Department and posted on the Department's website at <https://www.maine.gov/dep/waste/juniperridge/index.html>.

Volume III – Design Report of the licensing application contains additional details regarding the structure and design of the proposed expansion, including reference to the PFAS treatment system. The materials and methods discussed therein are largely consistent with the system design now planned for the PTL.

For your convenience, below is a listing of the items that MEDEP requested with SME's comments following.

Item 1: The selected location of the PFAS treatment system.

SME's Response: The proposed location for the PFAS treatment system is the Pine Tree Landfill (PTL) facility in Hampden, Maine, which is owned by NEWSME. The treatment system is proposed to be housed within the existing Landfill Gas Generator Building (Treatment Building). This location will allow treatment of leachate generated at both the JRL and PTL landfill facilities. The proposed change in location from the JRL to the PTL will enable NEWSME to treat PFAS leachate from both facilities, a significant environmental benefit over the initial proposal. As a result of the updated siting plan, Casella anticipates it will be able to treat approximately 11 million additional gallons of PFAS-containing leachate annually beyond what the Department is requiring at the JRL.

Item 2: A brief description of the process by which leachate will be conveyed to the PFAS treatment system.

SME's Response: The leachate at the JRL will continue to be pumped to, and temporarily stored in, the existing and additional proposed on-site aboveground leachate storage tanks as noted in the Design Report. The process will remain similar to the current process at the JRL in which landfill leachate is then loaded into trucks for transport to another wastewater treatment facility, historically at the ND Paper mill's treatment plant in Old Town. At the PTL, tanker trucks will park on a concrete-lined leachate transfer pad while leachate is transferred by gravity into a high-density polyethylene (HDPE)-lined transfer tank and associated dual-containment pump station. The leachate will then be pumped to a leachate storage tank, stored, and then pumped through the proposed PFAS treatment system. These tanks will be housed within the Treatment Building. Treated leachate will then be pumped to the proposed Treated Leachate Storage Tank and subsequently disposed of at a permitted wastewater treatment facility. The storage and handling of leachate at the PTL through the updated PFAS treatment system does not materially differ from the system originally described in the licensing application for the JRL, other than the location.

Item 3: A brief description of the process by which PFAS treated leachate will be transported to a licensed wastewater treatment plant for further treatment and disposal.

SME's Response: Following treatment, leachate will be stored in the Treated Leachate Storage Tank, and subsequently transported to a permitted wastewater treatment facility. Due to the updated location of the proposed system, the treated leachate will be transported by one of the following methods:

1. Discharged to the Town of Hermon sewer system, then conveyed to the City of Bangor sewer system and wastewater treatment plant, which is the same pathway for the PTL leachate currently; or
2. Loaded into tanker trucks and transported to a licensed wastewater treatment plant for further treatment and disposal as originally anticipated and as is currently done at the JRL.

Item 4: If the PFAS treatment system will not be located at the Juniper Ridge Landfill, then updated drawings (without the proposed location of the PFAS treatment system) must be submitted.

SME's Response: Updated Phase II Expansion Drawings C-102, C-107, and C-311 and Cell 18 Construction Drawing C-101 are attached as requested.

Item 5: An update PFAS treatment system implementation schedule.

SME's Response: An updated PFAS treatment system implementation schedule is attached.

Item 6: The Department also notes that the leachate disposal contract with ND Paper Old Town LLC will soon expire. A new contract must be provided to the Department to fulfill normal operating requirements.

SME's Response: The current leachate disposal contract with ND Paper Old Town LLC is scheduled to expire on October 27, 2026, unless it is extended or renewed. NEWSME will provide copies of finalized leachate disposal contracts as they become available.

Please contact me if you have questions regarding the responses or enclosed material.

Sincerely,

SEVEE & MAHER ENGINEERS, INC.



Brian D. Pierce, P.E.
Principal/Chief Engineer

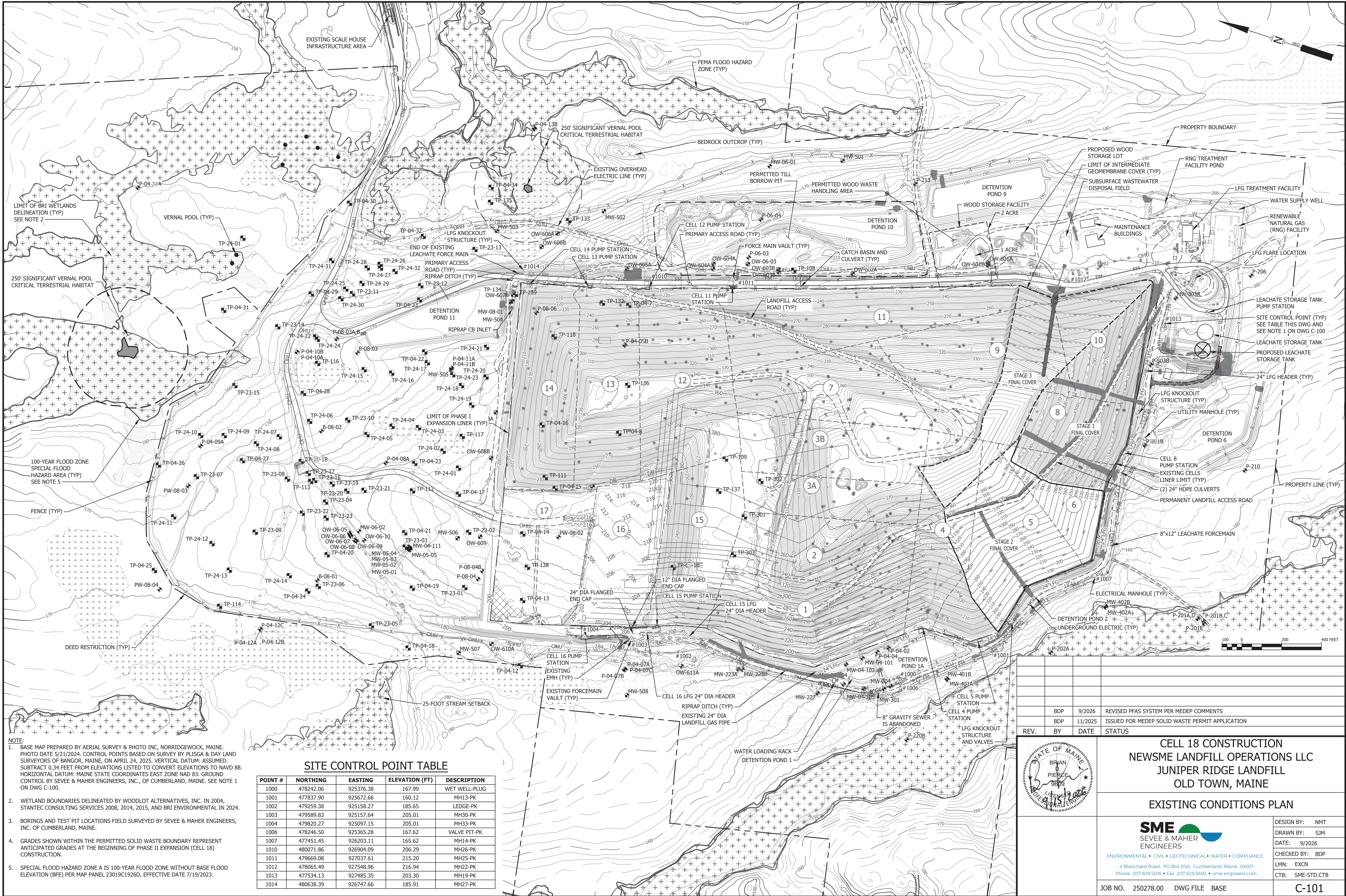
Attachments: Implementation Schedule
Drawings

IMPLEMENTATION SCHEDULE

PFAS TREATMENT SYSTEM IMPLEMENTATION SCHEDULE
PINE TREE LANDFILL
HAMPDEN, MAINE

Casella Waste Systems, Inc. PTL/JRL - PFAS TREATMENT SYSTEM (AT PTL FACILITY)		August	September	October	November	December	January	February	March	April	May	June	July	August	September	October	November	December	January	February	March	April	May
PROJECT SCHEDULE		2026	2026	2026	2026	2026	2027	2027	2027	2027	2027	2027	2027	2027	2027	2027	2027	2027	2028	2028	2028	2028	2028
3A	LEACHATE TRANSFER AREA PERMITTING AND DESIGN																						
	Solid Waste Licensing - Minor Revision (Leachate Transfer)		Submittal																				
	MEDEP Comments and Responses (Minor Revision)						Approval																
	Town of Hampden Permit Application (Leachate Transfer - Major Application)						Approval																
	Bangor WWTP Discussion/Permitting/Approvals (Leachate Transfer)																						
	Hermon Sewer District Discussion/Permitting/Approvals (Leachate Transfer)																						
3B	LEACHATE UNLOADING AREA CONSTRUCTION																						
	Bid and Award Contract					Bid		Award															
	Construction																						
4A	PFAS TREATMENT SYSTEM PERMITTING AND DESIGN																						
	Detailed Mechanical/Electrical Design																						
	Amendment Application Preparation (SME)																						
	MEDEP Permit - Amendment Application					Review Start																	
	Town of Hampden Permit Application (Major Application)					Process Start																	
	Air: Insignificant Activities Submittal																						
	Air: MEDEP Comments and Responses																						
4B	PFAS TREATMENT SYSTEM CONSTRUCTION																						
	Bid and Award Contract						RFP Issued	Due			Award												
	Order Tank and Equipment																						
	Construction: Building Improvements																						
	Construction: Tank and Exterior Piping Installation																						
	Construction: PFAS Treatment System																						
4C	Treatment System Shakedown Period																						

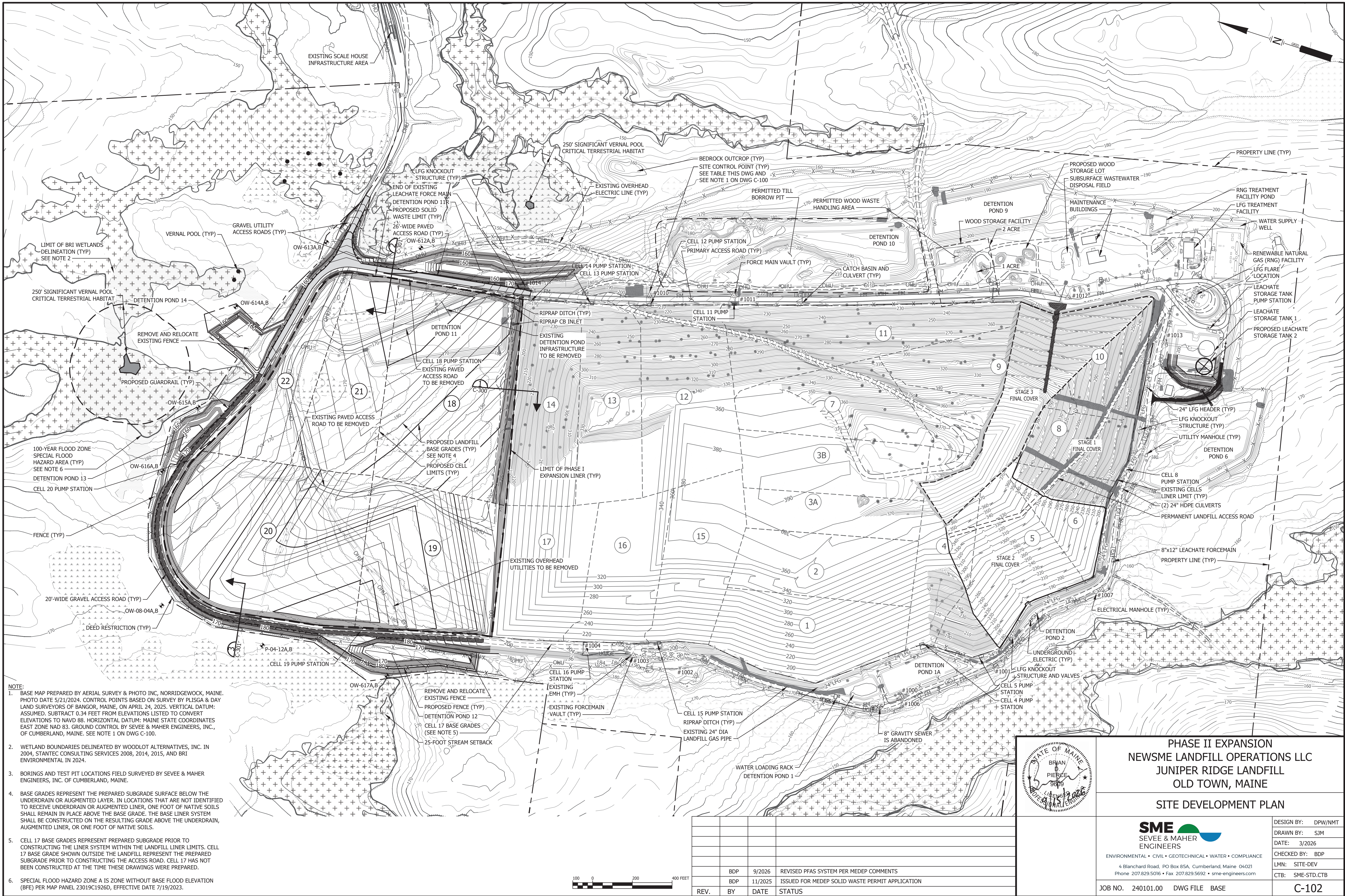
DRAWINGS



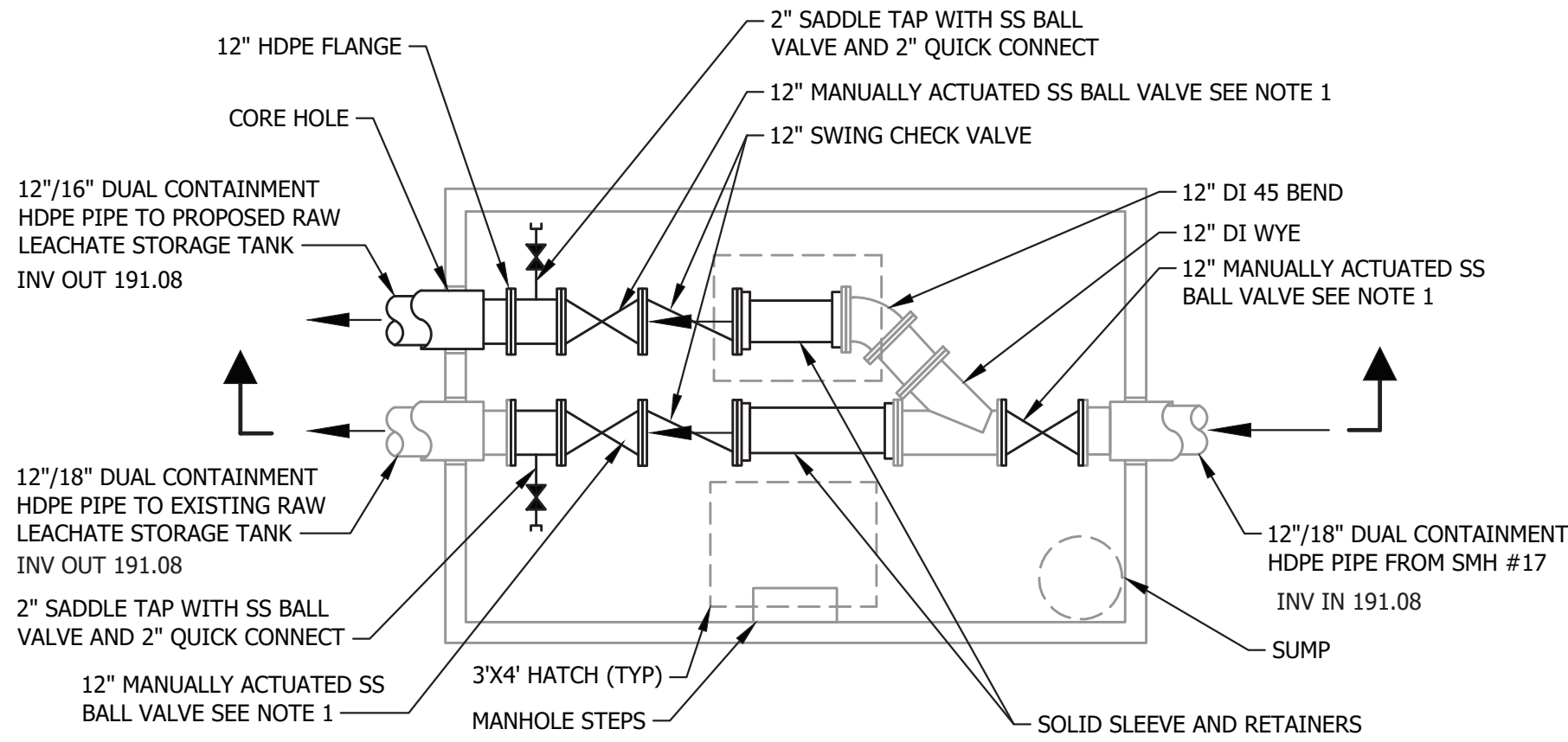
- NOTE:
1. BASE MAP PREPARED BY AERIAL SURVEY & PHOTO INC, NORRIDGEWOCK, MAINE. PHOTO DATE 5/21/2024. CONTROL POINTS BASED ON SURVEY BY PLISGA & DAY LAND SURVEYORS OF BANGOR, MAINE, ON APRIL 24, 2025. VERTICAL DATUM: ASSUMED. SUBTRACT 0.34 FEET FROM ELEVATIONS LISTED TO CONVERT ELEVATIONS TO NAVD 88. HORIZONTAL DATUM: MAINE STATE COORDINATES EAST ZONE NAD 83. GROUND CONTROL BY SEVEE & MAHER ENGINEERS, INC., OF CUMBERLAND, MAINE. SEE NOTE 1 ON DWG C-100.
 2. WETLAND BOUNDARIES DELINEATED BY WOODLOT ALTERNATIVES, INC. IN 2004, STANTEC CONSULTING SERVICES 2008, 2014, 2015, AND BRI ENVIRONMENTAL IN 2024.
 3. BORINGS AND TEST PIT LOCATIONS FIELD SURVEYED BY SEVEE & MAHER ENGINEERS, INC. OF CUMBERLAND, MAINE.
 4. GRADES SHOWN WITHIN THE PERMITTED SOLID WASTE BOUNDARY REPRESENT ANTICIPATED GRADES AT THE BEGINNING OF PHASE II EXPANSION (CELL 18) CONSTRUCTION.
 5. SPECIAL FLOOD HAZARD ZONE A IS 100-YEAR FLOOD ZONE WITHOUT BASE FLOOD ELEVATION (BFE) PER MAP PANEL 23019C1926D, EFFECTIVE DATE 7/19/2023.

POINT #	NORTHING	EASTING	ELEVATION (FT)	DESCRIPTION
1000	478242.06	925376.38	167.99	WET WELL-PLUG
1001	477837.90	925672.66	160.12	MH13-PK
1002	479259.38	925158.27	185.65	LEDGE-PK
1003	479589.83	925157.64	205.01	MH30-PK
1004	479820.27	925097.15	205.01	MH33-PK
1006	478246.50	925365.28	167.62	VALVE PIT-PK
1007	477451.45	926203.11	165.62	MH14-PK
1010	480071.86	926904.09	206.29	MH26-PK
1011	479669.08	927037.61	215.20	MH25-PK
1012	478065.49	927548.96	216.94	MH22-PK
1013	477534.13	927485.35	203.30	MH19-PK
1014	480638.39	926747.66	185.91	MH27-PK

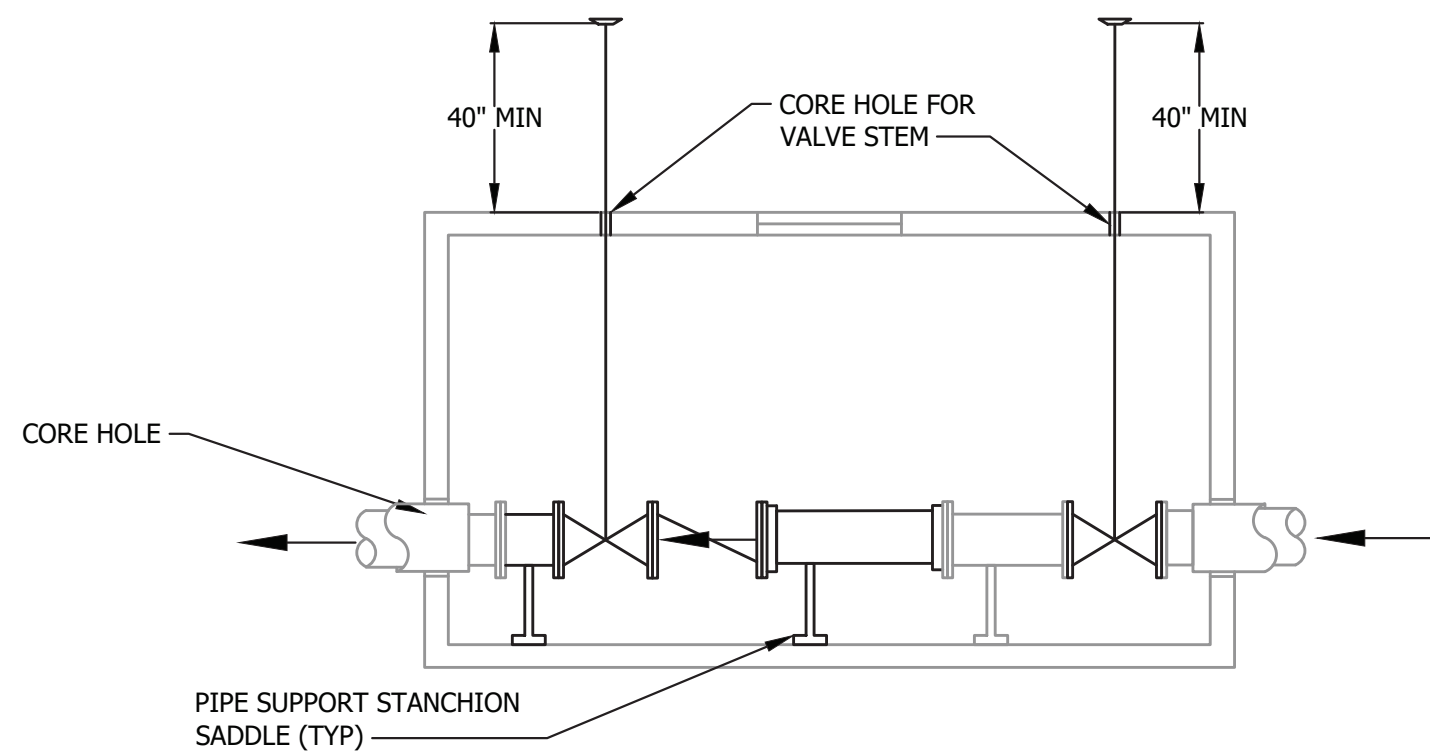
REV.				BDP	9/2026	REVISED PFAS SYSTEM PER MEDEP COMMENTS	
REV.				BDP	11/2025	ISSUED FOR MEDEP SOLID WASTE PERMIT APPLICATION	
REV.				BY	DATE	STATUS	
				CELL 18 CONSTRUCTION			
				NEWSME LANDFILL OPERATIONS LLC			
				JUNIPER RIDGE LANDFILL			
				OLD TOWN, MAINE			
EXISTING CONDITIONS PLAN				DESIGN BY: NMT			
				DRAWN BY: SJM			
ENVIRONMENTAL • CIVIL • GEOTECHNICAL • WATER • COMPLIANCE 4 Blanchard Road, PO Box 85A, Cumberland, Maine, 04021 Phone 207.829.5016 • Fax 207.829.5692 • sme-engineers.com				DATE: 9/2026			
				CHECKED BY: BDP			
JOB NO. 250278.00 DWG FILE BASE				LMN: EXCN			
				CTB: SME-STD.CTB			
				C-101			



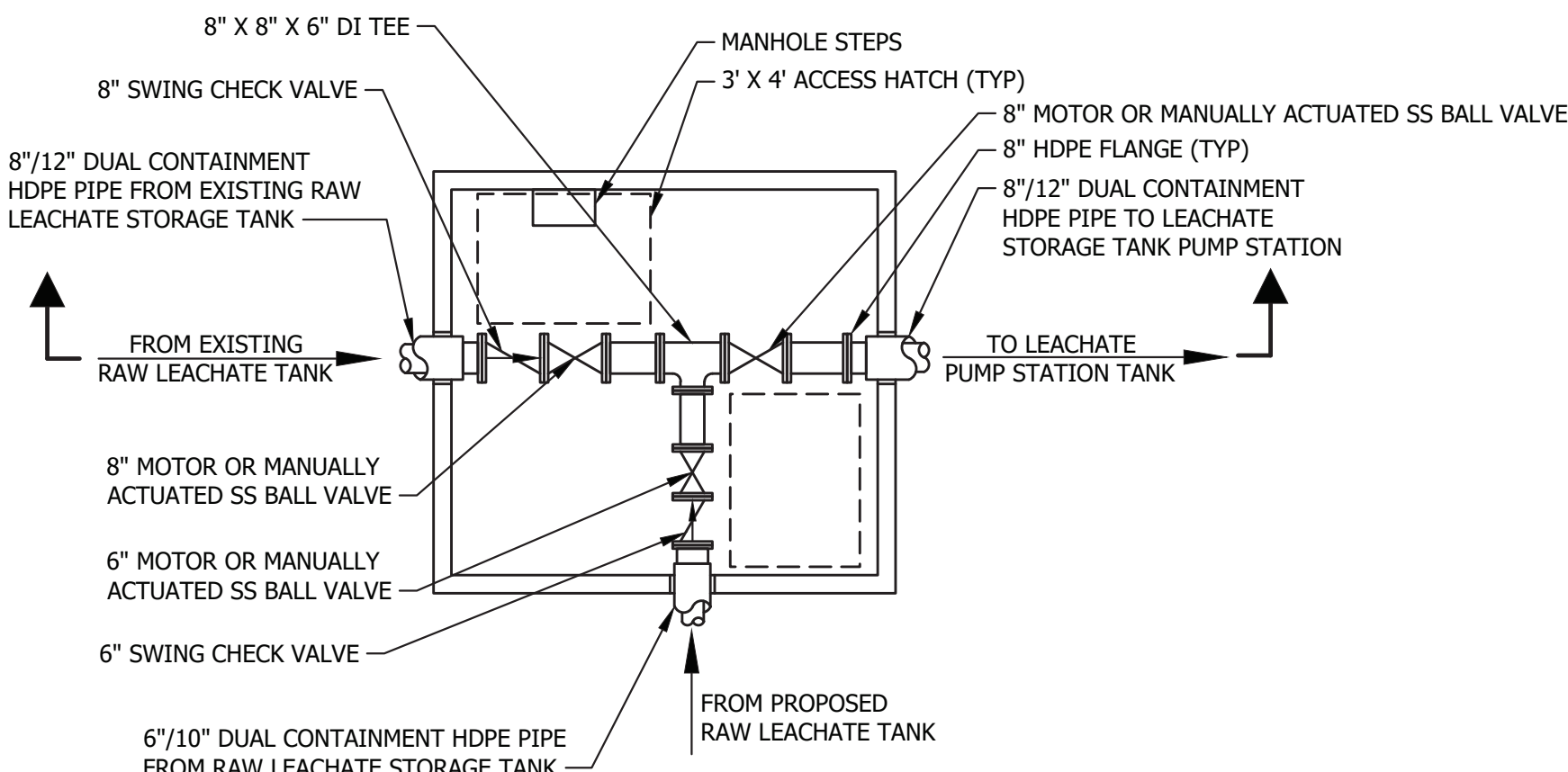
X			
	BDP	9/2026	REVISED PFAS SYSTEM PER MEDEP COMMENTS
	BDP	11/2025	ISSUED FOR MEDEP SOLID WASTE PERMIT APPLICATION
REV.	BY	DATE	STATUS



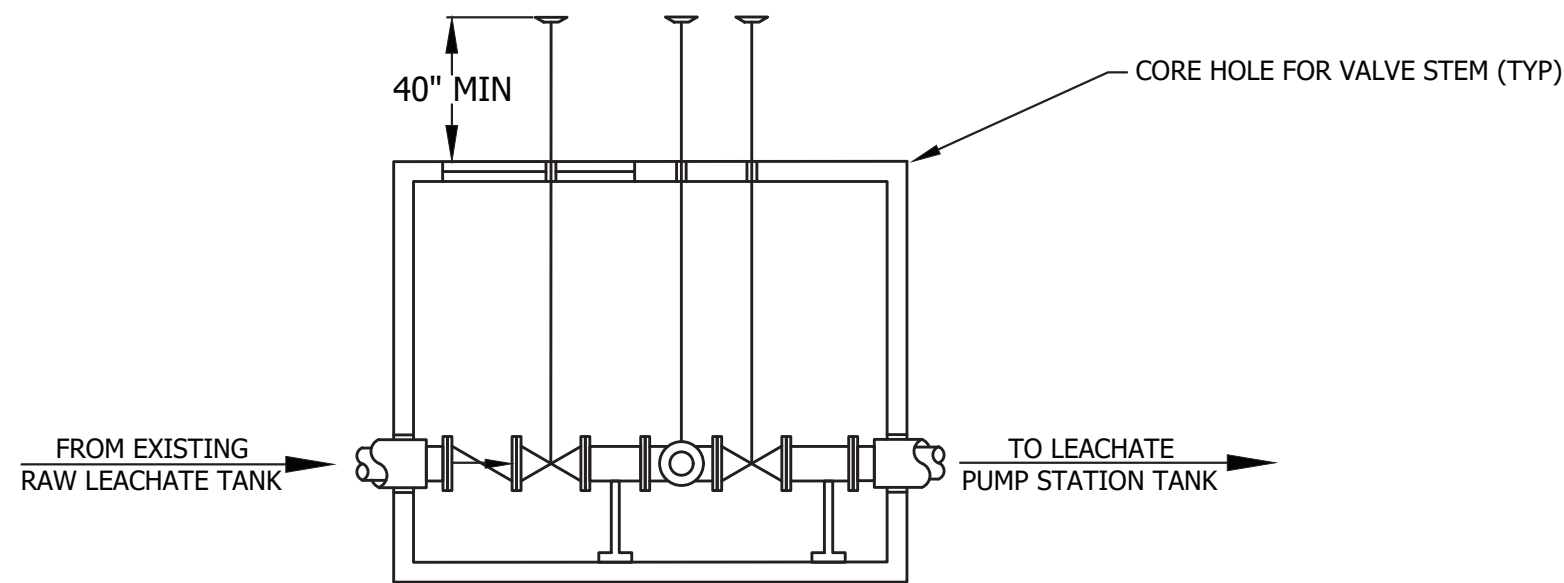
- NOTES:
1. BALL VALVE TO BE MANUALLY ACTUATED WITH HANDWHEEL AND EXTEND A MINIMUM OF 40" ABOVE THE STRUCTURE



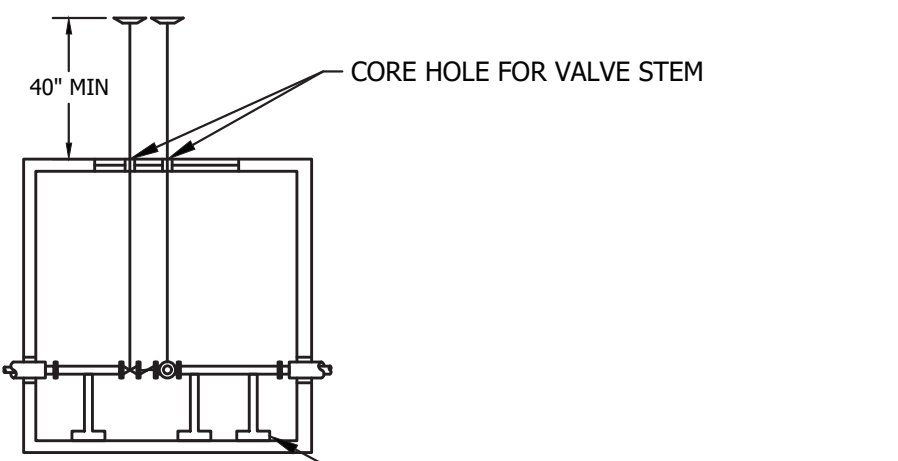
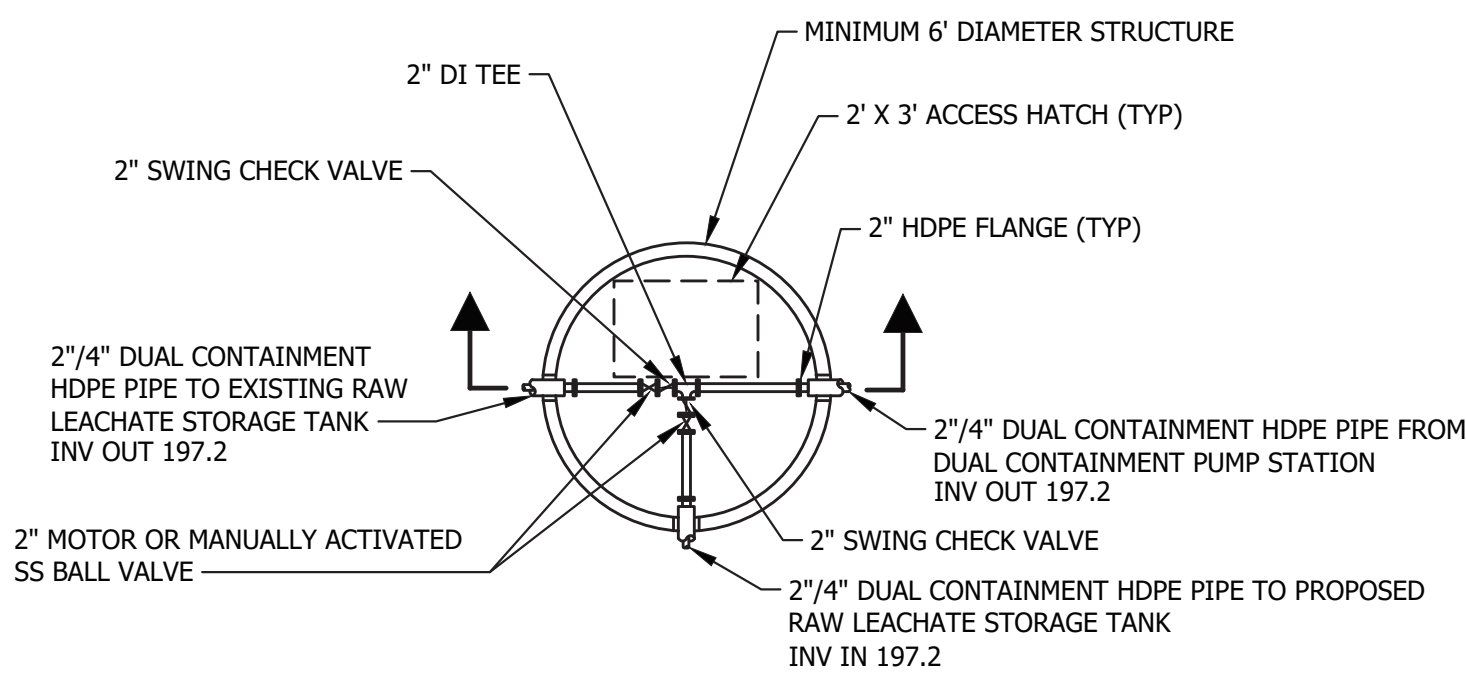
SMH #18 MODIFICATIONS
NTS



- NOTES:
1. DRAIN EXISTING LEACHATE STORAGE TANK PRIOR TO COMMENCING TIE-IN OPERATIONS
 2. BYPASS LEACHATE PUMPING REQUIRED FROM EXISTING LEACHATE STORAGE TANK TO EXISTING LEACHATE STORAGE TANK PUMP STATION DURING TIE-IN OPERATIONS

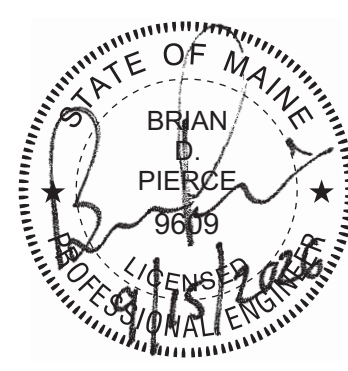


TANK DISCHARGE VALVE PIT
NTS



LOADING RACK VALVE PIT
NTS

REV.	BY	DATE	STATUS
	BDP	9/2026	REVISED PFAS SYSTEM PER MEDEP COMMENTS
	BDP	11/2025	ISSUED FOR MEDEP SOLID WASTE PERMIT APPLICATION

	PHASE II EXPANSION NEWSME LANDFILL OPERATIONS LLC JUNIPER RIDGE LANDFILL OLD TOWN, MAINE		
	SECTIONS AND DETAILS		
	DESIGN BY:		DPW/NMT
	DRAWN BY:		SJM
	DATE:		9/8/2026
	CHECKED BY:		BDP
	LMN:		LMN
ENVIRONMENTAL • CIVIL • GEOTECHNICAL • WATER • COMPLIANCE 4 Blanchard Road, PO Box 85A, Cumberland, Maine 04021 Phone 207.829.5016 • Fax 207.829.5692 • sme-engineers.com		CTB:	SME-STD.CTB
JOB NO. 240101.00 DWG FILE DETAILS		C-311	