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March 28, 2025

Dominique DiSpirito
Environmental Specialist III, Bureau of Remediation and Waste Management
Maine Department of Environmental Protection
106 Hogan Road; Suite 6
Bangor, ME 04401

RE: NEWSME Landfill Operations, LLC
Plans & Schedule – Implementing a Mattress Recycling Program in Maine
Juniper Ridge Landfill Public Benefit Determination (S-020700-W5-CV-N)

Dear Ms. DiSpirito:

On October 2, 2024, the Maine Department of Environmental Protection (Department) issued a Determination of Public Benefit Order (Order) for NEWSME Landfill Operations, LLC (Casella)'s proposed expansion of the Juniper Ridge Landfill in Old Town. The Order requires Casella to submit a report detailing its plans and schedule for implementing a mattress recycling program (Program) within six months. The following is a summary of Casella's plans and schedule for the Program, to be operated by its affiliate, Casella Recycling LLC, a wholly owned subsidiary of Casella Waste Systems, Inc.

Casella met with the Department on November 4, 2024 to discuss the Program; following which, the Department advised that a solid waste processing facility license would be required. Based on this guidance, an application was prepared and submitted for review on February 18, 2025. The Department accepted the application as complete for processing on March 7, 2025, assigning it number S-022603-WK-A-N. The application remains pending.

If approved, Casella plans to add the Program to its currently operating Materials Recycling Facility (MRF), located on Gibson Road in Scarborough. The MRF, which is exempt from 06-096 Code of Maine Rules (C.M.R.) Chapter 400, § 2.I.(8), accepts source-separated recyclables such as cardboard, pre-sorted plastic containers, separated papers, and metals from both public and private entities. The Program would involve the processing, dismantling, and recycling of mattresses and would be done alongside the other recycling activities at the MRF and begin about a month after approval. The Program would be conducted at the MRF at least until March 2033, the current lease term. At that point there is an option to extend the lease for another five years, until March 2038.

The Program would source/collect clean mattresses and box springs at mattress collection locations, primarily in Maine. Locations would include Casella-operated solid waste transfer stations, partnering third party locations, and residences. Clean mattresses would be stored in enclosed box trailers, until a full load is accumulated, then would be transported to the MRF.

Once at the MRF, clean mattresses would be weighed or counted and unloaded using a forklift. One by one, they would be placed on a processing table, where the outer cover would be removed for disposal. Inner foams would be set aside for recycling. The remaining metal and wood foundations (if applicable) would then be transferred to a shear table where the metal would be separated from the wood with hydraulic assistance. When complete, metal would be placed through a baler or shredder and clean wood would be compacted to aid in size reduction and consolidation. Recovered recyclable materials (foam, metal, etc.) would be placed in the warehouse area alongside other source-separated materials. Wood would be stored in an enclosed compactor (adjacent to the building). When a full load of an individual material is accumulated, individual materials would be loaded into trailers or roll off containers, weighed, and hauled off-site for recycling. Examples of where recovered recycling materials may be sent include: a biomass facility or other wood reuse operation, a metal recycling facility, a carpet padding manufacturer, etc.

Daily tonnages through the MRF would depend on supply and demand. If both source-separated recyclables processing and mattress recycling functions are in operation, the MRF expects to receive between 150 to 250 tons per day of total material. This number includes an estimated 1 to 2 trailer loads of mattresses and equates to 130-260 mattresses per day, (30,000 to 60,000 per year), if processing occurs 5 days per week. Based on conversion factors listed in the Department's 2024 Annual Solid Waste Management Report for Licensed Transfer Stations/Storage sites, it is estimated that 600 to 1,200 tons of mattress material per year would be diverted away from landfills and recycled. This number assumes that 75% of mattress materials would be recycled and/or sold as a commodity.

Thank you for the opportunity to provide the Department with an overview of the Program. If you have any questions or require further clarifications on the Program, please feel free to contact the undersigned.

Respectfully submitted,

NEWSME LANDFILL OEPRATIONS, LLC

Jeffrey Pelletier

**Environmental Manager**