

Mark and Karen Koneff
3019 Bennoch Road
Alton, ME 04468

August 18, 2024

Ms. Karen Knuuti
Environmental Specialist
Bureau of Remediation and Waste Management
Maine Department of Environmental Protection
106 Hogan Road
Bangor, ME 04401

Subject: Opposition to the application for expansion of the Juniper Ridge Landfill in Old Town

Dear Ms. Knuuti:

As an Alton resident, and neighbor of the Juniper Ridge Landfill, I would like to express my strong opposition to the application for proposed expansion delivered on July 7, 2024 to the State Department of Environmental Protection.

The purported community benefits that the Landfill provides to Old Town and Alton do not offset the detrimental effects our communities have experienced in odor, traffic, air pollution, and noise and the associated effects on quality of life and property values. Most residents in these areas receive no property tax payments or property value guarantee. Alton, in particular has realized little benefit.

The expansion proposal proudly states that the Juniper Ridge site accepts many forms of waste from all Maine counties. Many of these areas are substantially more affluent and influential than the Old Town/Alton area and Penobscot Nation, yet not only do these communities, and the State, gladly shift their waste disposal challenges off to the Old Town/Alton residents, they refuse to implement processes that could reduce the impact on the communities neighboring the Juniper Ridge Landfill. Cost and inconvenience drive these decisions with, again, no concern for the cost or impact to the communities surrounding the landfill.

In 2022, the passage of LD1911 prohibited the long-time practice of spreading of sewage sludge as fertilizer. This law also allowed for sludge to be disposed at solid waste landfills which greatly increased the deposition of sludge at the Juniper Ridge Landfill. No additional treatments were applied, or required to be applied, to the sludge to minimize the environmental effects or effects to the local communities due to the substantial increase in landfill odor.

The Juniper Ridge Landfill operations show a history of disregard for State law and regulation in the reliance of loopholes to accept large volumes of out-of-state waste. Also in 2022, the passage of LD 1639 restricted the amount of out-of-state waste processed at Juniper Ridge closing some loopholes. The reduction in the intake of out-of-state waste forced the landfill operators to

restrict incoming sludge because it could not be adequately stabilized. When sufficient alternative daily cover materials are not available the landfill operators utilize sand and gravel as a cover material. The residents of Alton living along the Bennoch Road contend daily with largely unregulated high volumes of high-speed traffic, including extremely high volume of dump truck traffic from the gravel pits in north Alton. Increased use of sand and gravel to stabilize the landfill creates an even higher volume of dump truck traffic and attendant noise, air pollution, and safety concerns due to high rates of speed and limited traffic enforcement.

During the time-period when sludge processing at Juniper Ridge was restricted, the sludge was diverted to other US and Canadian facilities, dispelling the notion that no other options exist. The fact that is that other more costly and inconvenient options exist, or could be developed, that would more equitably spread the burden of the state's waste challenges. However, the repeated solution has been, for the obvious convenience and cost-savings of others including many more affluent Maine communities, to impose greater and greater burden on the Old Town and Alton communities as well as the Penobscot Nation. Surely there are solutions that should be aggressively pursued now that would share the burden more equitably in the future, in keeping with Federal and State commitments to the concept of environmental justice.

Thank you for the opportunity to comment on the proposal.

The image shows two handwritten signatures in cursive. The top signature is "Mark Zureff" and the bottom signature is "Jarent Zureff". Both are written in dark ink.