

**From:** [Dana Colihan](#)  
**To:** [Knuuti, Karen](#)  
**Subject:** Public Comment on Public Benefit Determination Application for Juniper Ridge Landfill (DEP# S-020700-W5-CV-N)  
**Date:** Friday, September 6, 2024 4:32:35 PM

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Dear Commissioner Loyzim and Environmental Specialist Knuuti,

We urge the DEP to issue a negative public benefit determination for the expansion of Juniper Ridge Landfill. The application does not pass the criteria needed for a public benefit determination and poses significant risks to our environment and communities.

At Slingshot, we believe everyone deserves the right to breathe clean air, drink clean water, and live in healthy, vibrant communities. Slingshot is an environmental health and justice organization, working alongside communities most impacted by environmental threats to take aim at polluters and build community power. Through this work we've witnessed the real threat that landfills pose to our communities and our environment.

**The application conflicts with Maine's Solid Waste Management Hierarchy.**

Expanding the landfill does nothing to increase reduction, prioritize reuse, or develop recycling or composting programs. Casella has spent two decades squandering the state's limited landfill capacity importing massive volumes of Construction and Demolition Debris contrary to state statute. Casella charges exorbitant recycling fees that work against our recycling goals, and profits over a [billion dollars annually](#), making money off of disposal of waste at Juniper Ridge.

We need to be building toward a zero waste future, where we are meaningfully reorienting how we manage resources and materials upstream. We need significant waste reduction, composting, recycling, and industrial redesign for healthier communities and a healthier environment.

The state's waste management goals are at-odds with a company that profits from maximizing waste disposal. Building disposal capacity without meaningful plans for waste reduction only invites further pollution. This is a band-aid approach to waste and materials management and does nothing address the failures of the current system, or create a meaningful long term solution for our waste needs.

**Expanding Juniper Ridge Landfill violates the environmental justice requirements for impacted communities.**

The landfill has been a source of environmental injustice for decades. One of the most apparent ways that Juniper Ridge Landfill has disproportionately burdened the

Penobscot Nation, is through the disposal of the minimally-treated PFAS-laden effluent from JRL into the Penobscot River.

Now, these sacred waters are contaminated, posing a threat to the health and environment of everyone in Maine but especially to the Penobscot Nation, whose spiritual and cultural practices are directly impacted by this kind of pollution on sacred tribal lands. In 2019, the EPA found 7,331 ppt of PFAS in a Smallmouth bass from the [Penobscot River](#). Tribal citizens were advised not to consume fish from the river, due to the potential health risks; however some tribal members have continued to fish despite these risks because of the importance of practicing sustenance rights and [culture](#).

Furthermore, Casella has been [unable to manage odors](#) from their operations at Juniper Ridge landfill. Odors aren't just a nuisance, but also pose a public health risk. A common landfill odor is [hydrogen sulfide](#), a toxic gas that can cause irritation to eyes, respiratory issues including asthmatic symptoms, headaches, nausea, and vomiting.

In May of 2023, [a fire broke out](#) at Juniper Ridge Landfill which burned for four hours. During an uncontrolled burn, dioxins are produced and introduced into the environment when waste is [burned](#), and can settle on vegetation and bio-accumulate within the food chain.

The Environmental Protection Agency has an EJ Screening tool, which uses demographic factors like income and race in comparison to environmental burden indicators. Compared to the rest of Maine, communities surrounding the landfill are within the 95th-100th percentiles of exposure to Nitrogen Dioxide, Toxic Releases to Air, Traffic Proximity, Hazardous Waste Proximity, and Waste Water Discharge.

When we examine all of these factors—it is abundantly clear that expansion of Juniper Ridge fails the required environmental justice criteria.

We urge you to pursue an independent environmental review of Casella's landfill practices and the cumulative environmental justice impacts, prior to acceptance of an expansion application.

Any approval for expansion MUST be conditioned to require:

- - A dewatering system for sludge
- - Setting a maximum fill limit
- - Placing a cap on the pulverized "CDD fines" used for alternate daily cover
- - An on-site leachate PFAS treatment system

We urge you to turn the tide toward zero waste solutions, and that starts with issuing a negative public benefit determination. Thank you for taking action to protect Mainers and protect our environment.

Sincerely,

Dana Colihan  
Co-Executive Director, Slingshot



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