

RE: The Proposed Expansion of the Juniper Ridge Landfill in Old Town

To: Maine Department of Environmental Protection, Karen Knuuti: karen.knuuti@maine.gov

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Submitted September 23, 2024

Thank you to the department for extending the public comment period in regards to the proposed expansion of the Juniper Ridge Landfill. With the initial comment period expiration set on Friday, September 20, 2024 and the final decision on this matter initially to be issued the following Monday, September 23, 2024, it makes one wonder just how seriously public comment will be considered. I note that due to public outcry the deadline for public comment submission is now extended to Friday, September 27, 2024 with a final decision to be issued the following Wednesday, October 2, 2024. It is my expectation that little work actually occurs over a weekend, so at least the time for the department to consider public comment has extended from essentially a next-day decision to two-plus days to consider our concerns about this approval which has great weight in that it will kill more people—if not immediately, then slowly, painfully and expensively.

Maine Environmental Justice law demands that those who would be impacted by this expansion be protected from injury. That is all of us. The existing landfill has already polluted and continues polluting the local soil, water and air in the immediate area and beyond. Citizens have lodged numerous complaints. You know them. You know the law. You know the reality of the damage this facility has done and will continue to do. You also know the track record of Casella Waste Systems for what appears to be skirting the law, not providing meaningful test data, and promising actual magic in stating that inconsequential levels of toxins will escape.

The large-scale expansion of Juniper Ridge Landfill to supposedly take care of Maine's waste, speaks to the history of Casella Waste Systems' import of waste including Construction and Demolition (C&D) debris from Massachusetts. They bolster collapsing landfills with discarded furniture and appliances—any engineer would see this as a viable reinforcement. (That was sarcasm.) All of these add endocrine-disrupting, neurotoxic, and cancer-causing toxics to surrounding soil, water and air. The health of people in the immediate area has been negatively impacted and Casella Waste Systems has profited. Where is the justice in allowing a company to profit while literally destroying the space it occupies and threatening all life?

Relying on Casella Waste Management Systems to build a facility that will safely handle the waste it manages and to provide accurate and timely information about releases to air, soil and water is insanity by Einstein's definition of doing the same thing over and over and expecting a different result. How many years have neighbors complained of odors that permeate buildings, saturate clothing and fill their nasal cavities with never-ending stench? How much pollution and damage has the Penobscot Nation shown to local waterways preventing them from eating fish harvested from them due to toxicity levels? How did Casella Waste Management Systems

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handle the fire that occurred in the spring of 2023? Is that considered responsible, sensitive to neighbors, adhering to Maine Environmental Justice law? We can only expect that same kind of avoidance and empty promises of “no harm” to continue. Accountability for clear, measurable, specific and meaningful aspects of the project and ongoing operations do not exist.

Maine Law Requires: “The facility will not pollute any water of the State, contaminate the ambient air, constitute a hazard to health or welfare or create a nuisance; . . . The department may not issue a license for a solid waste facility if it finds that the proposed facility will cause an unreasonable threat to the quality of a classified body of surface water, and, . . . The department may not issue a license for a solid waste disposal facility when it finds that the proposed facility overlies a significant sand and gravel aquifer or when the department finds that the proposed facility poses an unreasonable threat to the quality of a significant and gravel aquifer it does not overlie, or to an underlying fractured aquifer.”

Juniper Ridge Landfill sits on the watershed of the Penobscot River. The nature of water tables and rivers is that they flow. They flow into other rivers and through lands, they disperse contaminants. Liners leak. Ground water runs off. Current testing is insufficient to disprove that Juniper Ridge Landfill is polluting the Penobscot River. Indeed, PFAS levels in the river have been shown to greatly exceed allowable limits. But, even if it were not leaching, the landfill transports leachate (more opportunity for leakage, contamination and exposure) to Nine Dragons Paper Mill to be minimally treated before discharging it directly into the Penobscot River—loaded with PFAS, methyl-mercury and other neurotoxins.

All waste to be handled at the facility produces noxious releases and we need to work on detoxifying and significantly reducing our waste stream. Our law against single-use plastic bags was a step in that direction. Maine has been “vacation land” for decades. Our woods, waters and shores provide living and recreation for our residents and tourists. Food is grown and harvested from our soil and waters, but PFAS and heavy metal contamination has threatened our ability to continue making use of those harvests. Why would we want to import C&D, bulk plastic or any other waste others don’t want in their own back yards to poison our living space? A sane person would not. An ignorant one would not pay attention. A corrupt and greedy one would not give a damn. It seems to be assumed that if one doesn’t live in Old Town, Alton or on tribal lands near the facility, that consequences are not suffered. That view is shortsighted and extremely inaccurate. PFAS has been demonstrated to migrate through soil, water and air quickly. Volatile gases travel well beyond the reach of the facility and do have impact on all they touch—whether a person can identify them or not. Heavy metals, solvents, chemicals from personal and industrial life are all part of the landfill and leach as they break down and combine to make new toxic cocktails. Most of the animal kingdom recognizes that it is a bad idea to expel

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their waste where they live, so why would we as supposed intelligent life allow a corporation with hundreds of environmental infractions across the region to conduct this business and import waste into our living space? How does the Department of Environmental Protection see allowing this expansion under these terms as protection of our environment?

Promises of waste-to-energy and plastic “recycling” are hollow. Good science shows them to be fraught with serious concerns of toxicity for all exposed to them: workers handling the waste, those in the facilities processing it and the residents nearby and miles from such facilities.

If this public comment period is offered with a sincere interest in how the tax-paying, air-breathing citizens of this state feel about this expansion and what their wishes for it to be, then the Maine Department of Environmental Protection should have more than ample support for NOT allowing this expansion and instead to hold Casella Waste Management Systems to a stricter standard for management and reporting that is quantifiable, accurate and meaningful. If Maine wants to live up to the Dirigo motto, we should lead in holding Casella Waste Management Systems accountable for their threats to our air and our water and prevent them from inflicting more injury. They have controversial regional reputation and we could put an end to that here. Wouldn't that be a good precedent to set? Juniper Ridge in particular has had a history of offenses on the quality of life for the local citizens. Attempts by residents to get issues and concerns addressed have resulted in little to no change. This landfill is state owned, so why do we expect someone to do for money what we will not do for love? Why do we allow them to literally trash and pollute the space we live in and make a profit doing so?

As stated previously; you know the facts, you know the law, you know the track record. You should know the serious risk. The public has raised numerous concerns over the years about the present Juniper Ridge Landfill. So, based on these points, why would we allow an expansion of the toxic mess?

Maine, indeed the nation, has a responsibility to address the large volumes of waste our society generates. We need to look at detoxifying what enters it, reducing the volume of waste generated and encouraging our society to live with awareness. Will Maine lead the way and live up to its motto by denying this expansion due to its many deficits? Final approval must be denied. The public has spoken, over and over and over.

Dirigo,

Sharon Peralta
Springvale, Maine