

To: Karen Knuuti                      karen.knuuti@maine.gov  
From: Ralph Chapman              ralphchapman@zoho.com  
Date: September 27, 2024  
Re: public comment on draft DEP public benefit determination dated 9-13-2024

Karen Knuuti,

The Department of Environmental Protection (DEP) draft determination of public benefit for the expansion of the Juniper Ridge Landfill defies both logic and common sense.

As stated on page 4, under 2.B. Standards, "...the applicant must demonstrate...that the proposed facility...promotes the solid waste management hierarchy...and... Is not inconsistent with ensuring environmental justice for the community...".

The 9-13-2024 draft findings on these points (page 16, under 6.B., and page 20, under 8.E.) are contrary to the facts.

The errors of logic in the DEP's findings arise from describing, in the case of the hierarchy, minor insubstantial efforts at the higher levels of the hierarchy taking the place of promoting the hierarchy thereby allowing a major substantial violation of the hierarchy at the lowest level. In the case of the environmental justice, the error of logic arises from reliance on future monitoring equipment installations operated by the contractor to supplement contractor-only reporting of past performance to argue that there is no detrimental effect of the proximity of the landfill to the affected disadvantaged community, in direct opposition to personal testimony from affected persons.

The errors of common sense can be viewed simply as the oxymoronic 'had to destroy it to save it'; in this case, 'have to expand the least desirable landfilling in order to promote anything other than landfilling.' As for environmental justice, if expanding a major pollution source in a region of disadvantaged populations does not represent an affront to the concept of environmental justice, what possible action would be prevented by following the environmental justice law?

It is time to reconsider the DEP's reasoning and put the legislature in a posture to solve the state's complex solid waste problems by denying the application for expanding the Juniper Ridge landfill.

Sincerely,



Ralph Chapman