

September 27, 2024

Ms. Karen Knuuti, Environmental Specialist Bureau of Remediation and Waste Management Maine Department of Environmental Protection 106 Hogan Road STE 6 Bangor, Maine 04401

21 Bangor Street PO Box 726 Houlton, Maine 04730 Tel. (207) 532-2259 Fax (207) 532-1213

Re: Maine Bureau of General Services' Application for Public Benefit Determination for the Proposed Expansion of Juniper Ridge Landfill

Dear Ms. Knuuti,

The Houlton Water Company (HWC) supports Casella's request for a Public Benefit Determination to expand the Juniper Ridge Landfill. Since the legislative action of LD1911, the options for municipal wastewater plant sludge disposal have become increasingly difficult. Land application of sludge used to be a viable option and was effectively used by many wastewater plants, including HWC. Now, the only option available to our utility is to landfill our sludge. This increased volume of sludge into the states' landfills, has only exacerbated the issues they face, with ever increasing volumes of waste, and the space needed to dispose of it.

HWC has held a contract with Casella for over two decades to handle 400-600 tons of sludge produced each year at the wastewater treatment plant. The Houlton wastewater plant is relatively unique in that it needs to dispose of sludge all at one period of time, usually over the course of a couple of weeks in August of each year. This amount of sludge all at once makes it difficult, and in fact, impossible for some landfills to accept. Casella has done extremely well to accommodate HWC's sludge disposal needs, and we would be in an almost impossible sludge management predicament if they were not able to accomplish this for us.

We remain concerned about the valuable landfill space consumed by municipal sludge and continue to investigate other methodologies to reduce the amount of sludge produced by our facility. However, few solutions exist, and any that might marginally lower municipal sludge volumes would require multi-million-dollar investments that our small utility cannot afford.

HWC appreciates and understands the concerns the public has over an expansion of Juniper Ridge Landfill. However, waste disposal and the concerns of the surrounding communities need to be balanced. We all depend on landfills to handle our residential, commercial/industrial, and municipal waste streams. It is imperative that Juniper Ridge Landfill is able to continue their operations by this proposed expansion.

Thank you for your consideration of the Houlton Water Companies concerns in this matter.

Sincerely,

General Manager

Will Hogan

Waste Treatment Plant Supervisor

Will your