

**Coastal Resources of Maine LLC
1450 South Rolling Road
Baltimore, MD 21227**

September 25th 2018

Linda Butler
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Re: Support for Waste Management request for Expansion – Crossroads Landfill

Dear Ms. Butler:

Waste Management (“WM”) recently applied to the Maine Department of Environmental Protection (“Department”) to expand its Crossroads facility in Norridgewock, Maine. Currently, the Crossroads facility provides critical disposal services for Maine communities and businesses. In the future, Crossroads will play an even greater role in the State’s waste disposal market through its support of Coastal Resources of Maine LLC (“CRM”), the co-licensee of the Fiberright/Municipal Review Committee (“MRC”) facility being constructed in Hampden, Maine. Given the critical role the Crossroads facility currently plays and the expanded role it will play in the future, we write to express our view that the Crossroads expansion constitutes a clear benefit to Maine’s public and submit our strong support for approval of the facility’s proposed expansion.

In August 2015, WM executed a ten year agreement for Disposal Services with MRC and CRM that, pursuant to statutory requirement, afforded bypass and backup waste disposal capacity for our Hampden advanced waste processing facility. While CRM’s facility brings the potential for unprecedented levels of recycling and diversion of waste to beneficial use, the facility relies on reliable sanitary landfill capacity to afford this opportunity. Therefore, the existence of such disposal capacity in support of advanced disposal technologies is entirely consistent with Maine’s waste hierarchy.

Further, WM has worked cooperatively with both the MRC and CRM to establish the following programs that benefit local communities in particular, and the state of Maine as a whole, to wit;

1. A waste swap agreement effective 3/31/18 that has saved communities in the northern sector of our service area significant public funds and has addressed a lack of regional waste transfer infrastructure.

2. An agreement to accept processed fines material resulting from MSW processing for use as alternative daily landfill cover that diverts material formerly landfilled for beneficial use.
3. Working cooperatively with CRM to establish pathways to backhaul MSW delivered to the Crossroads landfill by using the same trucks that CRM uses to deliver residues pursuant to contract. This cooperation could provide a paradigm shift in the way Maine processes waste insofar as each ton of waste could be processed for recovery of recyclables, and only residual waste generated after a “second pass” at CRM’s facility (subject to capacity constraint) would be landfilled.
4. Providing an option for disposal and further processing of unacceptable wastes that will not be processed at the Hampden facility such as Oversize Bulky Waste and vehicle tires.

Notwithstanding the above it is critical for CRM, under statutory requirement, to have a reliable bypass disposal option available to it after 2024. The Crossroads expansion is entirely consistent with the goals of Maine’s waste disposal hierarchy for the reasons described above, and Crossroads will play a critical role in the long-term success of CRM’s facility. Therefore, we strongly support WM’s expansion request.

Further,

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig Stuart Paul', with a large, stylized flourish at the end.

Craig Stuart Paul

Manager, Coastal Resources of Maine LLC
CEO Fiberight LLC