

**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**IN RE: ARIES PINE TREE LLC
AIR EMISSION LICENSE APPLICATION (#A-1195-71-A-N)
AND SOLID WASTE PROCESSING FACILITY LICENSE APPLICATION (#S-100033)**

**PETITION TO INTERVENE OF
SANFORD CLEAN AIR & WATER COALITION
AND CONSERVATION LAW FOUNDATION**

Pursuant to 5 M.R.S. § 9054(1) and 06-096 C.M.R. ch. 3, § 11(A)(1), Sanford Clean Air & Water Coalition and Conservation Law Foundation (collectively, “Petitioners”) petition to intervene as parties in Aries Pine Tree LLC’s air emission license and solid waste processing facility license proceeding before the Maine Department of Environmental Protection (“DEP”). In this consolidated proceeding, Aries Pine Tree LLC (“Aries”) seeks authorizations to construct a large-scale thermal treatment facility for sewage sludge, or “biosolids,” in Sanford (the “Facility”).

DEP must grant intervention to any petitioner who “is or may be . . . substantially and directly affected by the proceeding.” 5 M.R.S. § 9054(1); 06-096 C.M.R. ch. 3, § 11(A)(1). Petitioners readily satisfy this standard. Petitioners’ members live, own property, grow food, work, and recreate in close proximity to the site of the proposed Facility. Accordingly, as explained below, their health, property, recreational, educational, and aesthetic interests would be affected by Aries’ development and operation of the Facility pursuant to the authorizations it seeks in this proceeding.

Petitioners seek leave to intervene as full participants in this proceeding, including for purposes of presenting fact and/or expert witnesses at the hearing, cross-examining Aries’ witnesses, submitting evidence and briefing, and possible judicial appeals. This petition addresses all requirements for intervention petitions set forth in 06-096 C.M.R. ch. 3, § 11(A)(1),

and is timely filed before the August 3, 2026, deadline established by DEP. Maine Dep't of Env't Prot., Notice of Opportunity to Intervene at 2 (July 10, 2026).

THE PETITIONERS

I. Sanford Clean Air & Water Coalition

Sanford Clean Air & Water Coalition (the “Coalition”) is a community organization dedicated to supporting a vibrant, safe, and healthy environment in Sanford. Declaration of Eve Lucian Dumont-Wilson (“Dumont-Wilson Decl.”) ¶ 2. The Coalition’s members are primarily Sanford residents, along with some residents of neighboring towns who share the same environmental and public health concerns. *Id.* ¶ 3. The Coalition formed in response to Sanford community members’ concerns about the proposed Aries Pine Tree Facility. *Id.* Indeed, a community survey conducted by the Coalition in February through March 2026 garnered responses from more than 900 individuals who overwhelmingly expressed high levels of concern about the Facility’s environmental and public health impacts. *Id.* ¶ 4.

The Coalition holds weekly in-person meetings for members to share information, questions, and concerns; develop advocacy strategies; and assign related tasks. *Id.* ¶ 6. In addition, the Coalition maintains an email list of approximately 350 individuals and a Google Group to share updates and opportunities to participate in the Coalition’s activities. *Id.* ¶ 7. The Coalition develops and distributes information about the Aries Pine Tree Facility and other matters of local environmental and public health concern, organizes letter-writing campaigns, and encourages dialogue with local and state officials about issues of concern to Coalition members. *Id.* ¶ 5; *see also* Declaration of Nicole Tara Gorsun (“Gorsun Decl.”) ¶ 3, 5. Coalition members rely on the Coalition to inform them about issues related to the Facility and to advocate for their interests in preventing harmful pollution from the Facility. Gorsun Decl. ¶ 5.

II. Conservation Law Foundation

The Conservation Law Foundation (“CLF”) is a non-profit advocacy organization dedicated to protecting New England’s environment for the benefit of all people by using the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. Declaration of Sean Mahoney ¶ 3. CLF sees protecting communities against toxic pollution as an essential part of creating a future that is equitable and healthy for all. *Id.* ¶ 5. Advocacy to limit its members’ exposure to per- and polyfluoroalkyl substances (“PFAS”) and contaminated natural resources is a core part of CLF’s mission. *Id.* ¶ 7. As discussed more fully below, CLF members live, recreate, care for loved ones, and cultivate food in Sanford near the site of the proposed Aries Pine Tree facility. Declaration of John Henkelman (“Henkelman Decl.”) ¶¶ 2–3, 6–12; Declaration of Judith Gibbs (“Gibbs Decl.”) ¶¶ 2, 4, 6, 11–12.

EFFECTS OF THE PROPOSED ACTIVITY ON PETITIONERS

Petitioners’ members and their families live, work, recreate, and own property in Sanford—many in close proximity to the site of the proposed Aries Pine Tree Facility. *See* Dumont-Wilson Decl. ¶ 10 (noting that some Coalition members live less than one mile from the Facility site); Gorsun Decl. ¶ 2 (Coalition member explaining that she lives approximately 1.45 miles from the Facility site); Henkelman Decl. ¶ 3 (CLF member explaining that he lives approximately 3.5 miles from the Facility site); Gibbs Decl. ¶ 4 (CLF member explaining that she lives under 2 miles from the Facility site).

Petitioners’ members are deeply concerned about the potential impacts of the Facility on their health and the health of their children and other family members. Dumont-Wilson Decl. ¶¶ 9–21; Gorsun Decl. ¶¶ 3, 9–18; Henkelman Decl. ¶¶ 9, 12; Gibbs Decl. ¶¶ 6–13. Based on their reviews of Aries’ permit applications and data from Aries’ existing sewage sludge

gasification facility in Linden, New Jersey, they are concerned about emissions of PFAS and other toxic contaminants from the Facility. Dumont-Wilson Decl. ¶ 8; Gorsun Decl. ¶ 14; Henkelman Decl. ¶ 12; Gibbs Decl. ¶ 10. Based on the proximity of the Facility site to their homes and areas of the community that they frequent, Petitioners' members have specific concerns about toxic chemical releases from the Facility adversely affecting the quality of the air they breathe; the water they drink and recreate in; and the food that they grow at their homes, forage for in Sanford, and purchase from local farms. Dumont-Wilson Decl. ¶¶ 9–18, 20; Gorsun Decl. ¶¶ 8–16; Henkelman Decl. ¶¶ 6–9, 12; Gibbs Decl. ¶¶ 6–13. They are also concerned that pollution from the Aries Facility will harm wildlife, waterways, and conserved lands in which they have recreational, aesthetic, and educational interests. Dumont-Wilson Decl. ¶¶ 13–14, 17, 19; Gorsun Decl. ¶ 13; Henkelman Decl. ¶ 9; Gibbs Decl. ¶¶ 9, 12. In addition, Coalition members are concerned that development of the Aries Facility would negatively impact their property values and economic opportunities in Sanford. Dumont-Wilson Decl. ¶ 20; Gorsun Decl. ¶ 18.

If the Facility is constructed, it would exacerbate the stress and anxiety that Petitioners' members feel about the Facility's potential adverse impacts on their health and their family members' health. Gorsun Decl. ¶ 17; Dumont-Wilson Decl. ¶ 22; Gibbs Decl. ¶ 13. Some would stop eating food from their gardens, local farms, and areas near the Facility site where they currently forage, depriving them of free or low-cost sources of nutritious food and activities they value. Gorsun Decl. ¶¶ 8–10; *see also* Dumont-Wilson Decl. ¶ 17. Some who live close to the Facility site would postpone having children and would seek to move out of Sanford due to their concerns about adverse health effects from the Facility's toxic emissions, risking substantial disruption to their personal lives and careers. Gorsun Decl. ¶¶ 9, 15–16.

Denial of Aries' permit applications would protect Petitioners' members from these threatened harms. Henkelman Decl. ¶ 15; Gibbs Decl. ¶ 14. Accordingly, the health, property, aesthetic, recreational, and other interests of Petitioners' members will be "substantially and directly affected by the [outcome of this] proceeding." 5 M.R.S. § 9054(1); 06-096 C.M.R. ch. 3, § 11(A)(1).

SUBJECT MATTER OF THE HEARING

Petitioners intend to submit evidence and argument concerning some or all of the subjects and statutory/regulatory criteria below. Petitioners reserve the right to address additional issues if warranted based on the results of their ongoing investigation and the analyses of any experts they retain.

- A. Whether the Facility constitutes a new commercial solid waste disposal facility, which DEP lacks authority to license pursuant to 38 M.R.S. § 1310-X.
- B. Whether, assuming the Facility constitutes a solid waste processing facility under 38 M.R.S. § 1303-C(32-A), the applicant has demonstrated that the Facility satisfies the licensing criteria established in 38 M.R.S. § 1310-N and 06-096 C.M.R. chapters 403 and 409, including but not limited to whether the applicant has demonstrated that: (1) the applicant has the financial and technical ability to design, construct, operate, maintain, close, and accomplish post-closure care of the Facility in compliance with applicable requirements; and (2) the Facility's emissions of PFAS and other pollutants will not unreasonably adversely affect air or water quality.
- C. Whether the Facility constitutes an incinerator that must obtain an operating permit under Title V of the Clean Air Act, 40 C.F.R. part 70, and 06-096 C.M.R. chapter 140; and must comply with applicable New Source Performance Standards under 42 U.S.C. § 7429, 40 C.F.R. part 60, 06-096 C.M.R. chapter 143; and incinerator emissions standards under 06-096 C.M.R. chapters 104 and 403.
- D. Whether, if the Facility does not constitute an incinerator, the applicant has demonstrated that the Facility's controlled emissions will be below applicable minor source thresholds.
- E. Whether the applicant's proposed compliance monitoring conditions satisfy applicable requirements of 06-096 C.M.R. chapter 117.

- F. Whether the applicant has provided all information that is required by 06-096 C.M.R. chapter 115 and is necessary to evaluate the air emission license application.

PETITIONERS' SPOKESPERSONS

Petitioners' spokespersons for this proceeding are:

Katherine O'Brien
Earthjustice
P.O. Box 2297
South Portland, ME 04116
(212) 284-8036
kobrien@earthjustice.org

Nora Bosworth
Conservation Law Foundation
53 Exchange St. #200
Portland, ME 04101
(207) 210-6439 x.5017
nbosworth@clf.org

*Counsel for Sanford Clean Air
& Water Coalition and
Conservation Law Foundation*

Counsel for Conservation Law Foundation

PETITIONERS' ABILITY TO PARTICIPATE IN THE PROCEEDING

Petitioners are prepared to participate fully in this proceeding. Petitioners intend to participate, through counsel, in pre-hearing conferences; submit pre-hearing submissions; call and cross-examine witnesses and present argument at the hearing; and file post-hearing briefing and proposed findings of fact. In light of their common interests and in the interest of efficiency, Petitioners propose to consolidate their presentations of evidence and argument in this proceeding.

CONCLUSION

Petitioners respectfully request that DEP grant their petition to intervene.

Dated: 07/27/2026



Katherine O'Brien
Earthjustice
P.O. Box 2297
South Portland, ME 04116
(212) 284-8036
kobrien@earthjustice.org

*Counsel for Sanford Clean Air
& Water Coalition and
Conservation Law Foundation*

Respectfully submitted,



Nora Bosworth
Conservation Law Foundation
53 Exchange St. #200
Portland, ME 04101
(207) 210-6439 x.5017
nbosworth@clf.org

Counsel for Conservation Law Foundation

I, EVE LUCIAN DUMONT-WILSON, declare and state as follows:

1. I am a resident of the Springvale village in Sanford, Maine. I have lived in Sanford-Springvale for about 7 years. I am a mother of two, raising my 8-year-old daughter and my 2-year-old son. I am also a wildlife conservation student taking courses at Unity Environmental University.

2. I am a co-founder and lead organizer of the Sanford Clean Air and Water Coalition (the “Coalition”). The Coalition is a local community group whose mission is to support a vibrant, safe, and healthy environment in Sanford. Local community members formed the Coalition in response to their growing concerns about the proposed Aries Pine Tree sewage sludge gasification facility.

3. The Coalition’s membership is made up primarily of Sanford residents. It also includes some residents from towns neighboring Sanford, such as Wells and Shapleigh, who share Sanford members’ environmental concerns in part because they share interconnected watersheds and other natural resources with Sanford.

4. In February and March of 2026, the Coalition conducted a survey of community opinions on the Aries Pine Tree proposal. We received responses from over 900 individuals that indicated high levels of concern about the environmental and public health impacts of Aries’ facility, low confidence that existing regulatory controls would adequately protect the community, and a high level of interest in independent review and study of the proposal.

5. The Coalition’s ongoing activities include developing and distributing information about local environmental concerns and organizing and encouraging civic engagement through letter writing campaigns, tabling, and dialogue with local government and state agency representatives.

6. The Coalition holds weekly in-person meetings. At these meetings, members share information, questions, or concerns they have about the Aries proposal and other issues impacting Sanford's environment. The Coalition also uses these in-person meetings to brainstorm ideas, decide on our next action items, and assign tasks to members. Coalition members work collaboratively to set the Coalition's priorities and develop our advocacy strategies.

7. The Coalition also maintains an email list and Google Group to circulate updates and opportunities to participate in the Coalition's activities. There are currently about 350 people signed up to receive the Coalition's email communications, and the Google Group has about 13 members.

8. Currently, the Coalition's primary concern is the proposed Aries Pine Tree sewage sludge gasification facility as well as a separate, proposed hyper-scale data center. Aries' permit applications and data from its existing gasification plant in New Jersey indicate that the proposed facility has the potential to release PFAS and other contaminants of concern. Coalition members are deeply concerned that this project could harm our community's health in ways that are difficult or impossible to reverse once they happen.

9. Like other Coalition members, I am deeply concerned about the potential impact of the Aries Pine Tree facility on my health, my family's health, and the health and environment of our community. I moved to Sanford to raise my family. Sanford is my home and I am grateful to be a part of the community. It is where I am raising my children and where my family's future is rooted. As a mother, I think often about what it means to raise children in a place that may face added risks to air quality, water quality, and overall environmental health. I care deeply about our environment and the safety and well-being of our community.

10. If approved, the Aries Pine Tree facility will directly and substantially affect the Coalition's members. Our members live near the site—some less than one mile away—and rely on the natural resources it has the potential to pollute. As a result, we will be the ones that ultimately have to live with the human health, environmental, and economic harm the facility could cause.

11. One of the Coalition's primary concerns is how emissions and deposition of PFAS and other contaminants from Aries' facility will affect our drinking water. My family and I receive drinking water from Sanford's public water supply. Other coalition members receive water from either Sanford's public water supply or local private wells. Aries proposes locating its facility directly adjacent to the Mousam River and about half a mile from one of Sanford's Public Water Supply Protection Districts for drinking water aquifers. Coalition members understand that the human health consequences of increased PFAS exposure from drinking water are serious.

12. Another concern the Coalition has is that the facility may expose the community to harmful pollution in the air, soil, and water while we are enjoying the outdoors. I enjoy swimming, fishing, visiting parks, and hiking on trails in and around Sanford. In the summer, my family and I swim in the Mousam River a couple of times a week and fish at Mousam River and Deering Pond a couple of times a month. However, I do not allow myself or my family to eat the fish we catch because I am afraid it is contaminated. The Mousam River has a legacy of pollution from old industrial activity that Sanford has been cleaning up for decades.

13. Given Aries' proposed location on the Mousam River, I am concerned that releases of PFAS and other contaminants will make the waterways I enjoy unsafe for my family and me. I am aware that Estes Lake and parts of the Mousam River are already experiencing

elevated PFAS levels and that the Maine CDC has released advisories against eating local fish as a result. Additional contamination of these waterways with PFAS and other toxic chemicals would heighten health concerns and further limit our ability to recreate in and eat fish from our local waterways.

14. In addition to fishing and swimming, I use all of Sanford's trails, and Mousam Way Trail in particular, the southernmost end of which is about 3 miles from Aries' proposed site. When the weather is nice, my children and I walk these trails almost every week. I homeschool my children, and regular outdoor activity is a crucial part of their educational curriculum and emotional and physical wellbeing. It is incredibly important to us to have access to clean air, water, and soil at our local greenspaces.

15. Another concern I have is that the Aries facility's emissions will make eating locally grown food harmful to my health or my children's health by contaminating local water and soil with PFAS and other contaminants.

16. I enjoy gardening and eating local food. In spring and summer, my family and I enjoy foraging for fiddleheads and wild blueberries in forested areas near Mousam Way Trail and other locations around Sanford. I also regularly garden, and I purchase food from a community supported agriculture ("CSA") program. During the summer months, I eat food from my home garden almost every day and pick up food from the CSA each week, which receives crops from the Two Toads regenerative organic farm located in the neighboring town of Lebanon.

17. Foraging and gardening are frequent lesson topics for my children. It is very important to me to teach my kids about self-sufficiency. I also value the money I am able to save for my family by growing and gathering my own food. If the Aries facility is approved and

begins polluting local water and soil, I am concerned that continuing to eat food that I forage and grow in my garden would put my family at risk of health harms.

18. I visit areas near the Aries site, so pollution from the facility would impact me during my daily life. I grocery shop at Walmart about a mile and a half from Aries' proposed site. I also bring my children to dance practice in downtown Sanford several times a week.

19. I am also concerned about impacts on local ecosystems and wildlife. Wildlife and habitat damage are often treated as secondary concerns, but they are part of the health of the whole landscape. If pollution from Aries contaminates air, water, or soil, those impacts can ripple outward into habitat quality, food webs, and species health.

20. I and other Coalition members are further concerned that Aries has demonstrated no ability to successfully run the very type of facility it is proposing to build in our community. Aries' Linden, New Jersey, facility had many problems, and eventually it was idled and its entire workforce was laid off. We are aware that when an industrial facility malfunctions or is unable to operate at ideal conditions it can increase pollution emissions, bad odors, and risk of dangerous accidents. Aries' track record rightfully raises community concerns and lowers confidence that Aries will operate the proposed facility in a way that will not harm us. I, and the Coalition's members, do not feel that Sanford should have to act as a new experiment or sacrifice zone for a company with this kind of background.

21. Finally, I and other Coalition members are concerned about the impact Aries' proposed plant will have on our local economy and any potential for future growth. Sanford has had a long history of fighting to recover from business closures and loss of resources. Sanford lacks some of the business and tourism opportunities of Maine's coastal towns, but the community has worked hard, and Sanford has grown in popularity as an affordable and

welcoming place to live. Making Sanford into a regional sewage waste hub and adding a source of PFAS has the potential to seriously harm Sanford's long-term growth prospects and set back the progress Sanford has already made. I am also concerned about the negative impact this would have on local property values.

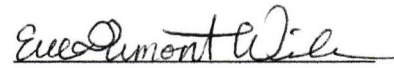
22. The Coalition's members are deeply impacted by these issues. Personally, I experience stress about this issue almost every day. My family also experiences stress over Aries' proposal. My daughter is very interested in environmental topics as well and after learning about Aries' potential for pollution has begun expressing worry about growing up healthy. At times I find it difficult to put on a brave face and console her when I know we are worried about the same, very real, issues.

23. Ultimately, I became involved in the Coalition and opposing Aries' proposal because I do not think community members should have to stay silent when they have real concerns about pollution and harms to public health, wildlife, and natural resources. I am not looking at the Aries proposal as an abstract policy question. I am looking at it as a mother, a resident, and a conservation student who understands that environmental harm is rarely isolated. If pollution or contamination happens here, it affects the Coalition, real people, real families, and the ecosystems that support all of us.

24. I am aware that Aries' ability to construct and operate its facility depends in part on the outcome of the Maine Department of Environmental Protection air and solid waste facility permit proceedings. As a result, my and other Coalition members' health, environmental, property, and economic interests will be substantially and directly affected by the outcome of that proceeding.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed this 4th day of June, 2026, in Sanford, ME.

A handwritten signature in cursive script, reading "Eve L. Dumont-Wilson", written over a horizontal line.

Eve L. Dumont-Wilson

DECLARATION OF JUDITH A. GIBBS
FOR CONSERVATION LAW FOUNDATION

I, Judith A. Gibbs, hereby declare and state:

1. This declaration is based on my personal and professional knowledge, information, and beliefs. I am over the age of eighteen (18) years and suffer from no legal incapacity. I submit this declaration in support of Conservation Law Foundation's ("CLF's") intervention in the Maine Department of Environmental Protection air and solid waste facility permit proceedings concerning Aries' proposed sewage sludge gasification facility in Sanford, Maine.
2. I am a member of Conservation Law Foundation. I align strongly with CLF's mission to protect New England's environment and public health, and because the environmental impacts of the proposed Aries facility could extend far beyond Sanford, affecting downstream communities and waters all the way to the coast.
3. I am also a member of the Sanford Clean Air and Water Coalition and have been involved with the Coalition since approximately the end of April 2026.
4. I live at 669 New Dam Road in Sanford, Maine, where I have lived for most of my life. I was born on June 15, 1957, and aside from approximately seven years spent attending school in North Carolina, I have lived in Sanford my entire life. I live on family land that has been in my family for generations. My husband lives with me, and my ninetyyear-old father lives next door on the same property, approximately 150 feet away. Our land is a little under two miles from the industrial park where the Aries facility is proposed to be sited.
5. I grew up in Sanford and was educated here right up until college. I earned a Bachelor of Science degree in Biological Sciences from North Carolina State University. After graduating, I worked as a laboratory technician in neuropharmacology at the University of North Carolina, where I assisted with research on brain cancers, drug delivery systems,

cell cultures, and immunology. Later, I worked for a diagnostic kit company in Portland, Maine, developing cancer detection tests, including early work involving the Prostate Specific Antigen tumor marker. I subsequently worked for a medical device company in Kennebunk, Maine, where I served in research and development, quality management, and ultimately as quality manager for approximately sixteen years. Much of my professional background involved understanding how biological molecules—such as proteins, lipids, and carbohydrates—interact with their environments.

6. My home is located less than one quarter mile from the Mousam River, downstream from the proposed Aries facility site. The water table in this area is extremely shallow—approximately thirty inches below ground—and my household relies on a surface well for drinking water. Based on information shared with my family by a geologist many years ago, our property sits atop a large aquifer that is hydraulically connected to the river. As a result, contamination of the river could directly impact our drinking water.

7. I have high blood pressure. I am deeply concerned that additional pollution, particularly PFAS contamination, could pose serious health risks to my family.

8. I am extremely concerned about Aries' proposed facility, especially its potential to emit PFAS and related compounds into the air, water, and land. PFAS compounds can mimic lipids and accumulate in fatty tissues, potentially triggering autoimmune disorders and other serious health effects. Based on my scientific background and my review of available information, the technology Aries proposes to use to destroy PFAS has not been demonstrated at commercial scale. Even a claimed 99% destruction rate would leave substantial quantities of PFAS unaccounted for when processing hundreds of tons of material per day, every day of the year. PFAS do not fully break down and will accumulate over time.

9. I am particularly worried about emissions to the Mousam River. The proposed facility is located near the river, which has flooded about four times due to storms during my

lifetime. The river already has fish consumption advisories issued by the State of Maine. When I was a child, the river was heavily polluted with sewage and industrial waste. It was green and smelled awful. It has taken more than fifty years of effort to restore the river to a condition where people can safely swim and boat, even though fish consumption remains unsafe. I am deeply afraid that the proposed Aries facility would reverse decades of environmental progress.

10. I am also concerned about air emissions from the facility. Due to local topography and prevailing winds, emissions could travel directly toward my home and neighborhood. The proximity of the facility to the Sanford airport—approximately 4,000 feet, according to Aries' own materials—also raises serious safety and regulatory concerns.

11. My husband, my brother, and I garden every year, growing vegetables such as tomatoes, cucumbers, and string beans, which we regularly eat and share with my father. My brother also lives on the same property, about 150 feet away. I am concerned that airborne or waterborne contamination from the Aries facility could contaminate our soil, crops, and groundwater. We also have pets that spend time outdoors and could be exposed.

12. The area surrounding the proposed facility supports abundant wildlife, including deer, bears, coyotes, bald eagles, hawks, bobcats, amphibians, and migratory birds. The river and surrounding forested land form an interconnected ecosystem. Pollution introduced into the river or surrounding environment would move through the food web and harm wildlife that depend on these resources. There are also Lady Slippers growing on our property that bloom in spring and are considered a threatened plant due to habitat loss.

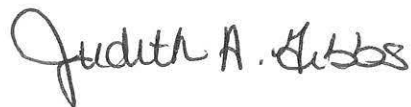
13. Living so close to the proposed Aries facility has caused me significant stress and anxiety. I fear a return to the polluted conditions of the 1960s and 1970s that I personally experienced. These concerns motivated me to attend the Town Halls on the matter and join the Sanford Clean Air and Water Coalition and CLF and to become more actively

involved in opposing the project.

14. I am aware that Aries submitted applications for a solid waste processing facility permit on January 7, 2026, and an air emissions permit on January 28, 2026. I understand that CLF seeks to intervene in the Maine Department of Environmental Protection permit proceedings to contest these applications. Denial of Aries' permits would protect me, my family, and my community from the serious environmental and health risks described above. I therefore support CLF's intervention in these proceedings.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 20, 2026

A handwritten signature in black ink that reads "Judith A. Gibbs". The signature is written in a cursive, flowing style.

Judith A. Gibbs

DECLARATION OF NICOLE TARA GORSUN

I, Nicole Tara Gorsun, declare and state as follows:

1. I have spent my whole life living in York County, Maine. I attended the University of Southern Maine, where I studied English and Education. After college, I worked in public education for most of my career, and now I am the Coordinator of Online Operations at the Center for Academic Innovation at the University of Southern Maine.

2. I currently live with my husband in Sanford. We moved to Sanford and purchased our house in 2019. We live approximately 1.45 miles from where the proposed Aries Pine Tree sewage sludge gasification facility would be built.

3. I am a member of the Sanford Clean Air and Water Coalition (the “Coalition”). My primary role in the organization is as a communications liaison between the Coalition and other advocacy groups in Sanford that are also opposed to the proposed Aries facility. I communicate with these groups via e-mail, Signal chats, and in-person meetings. In addition to this role, I regularly attend Coalition meetings, contribute to our advocacy strategy, and assist with events such as protests or tabling.

4. Beyond volunteering, I also make in-kind donations to the Coalition, such as office supplies, tables, and tablecloths.

5. I regularly receive emails and other educational materials provided by the Coalition related to the Aries facility. I rely on the Coalition to inform me about issues related to the facility and to advocate for my interests in preventing air and water pollution and public health harms from the facility.

6. I have been involved with local Democratic politics since 2015. In the past, I have served as a member of the York County Democratic Committee, and I am a delegate for Sanford this

year for the Maine State Convention. My local activism has always centered around fighting to keep my home safe and to not let businesses exploit my community.

7. I became involved with the Coalition because I want to leave my community better than the way I found it. I moved to Sanford because it was economically affordable while still being close to the rest of my family who live in Eliot around 20 miles south. I love Sanford. I want my community to continue to be a healthy and safe place for other people to grow up. I am proud to live here, and I am glad to work with others in the Coalition who share the same goal.

8. I garden and grow a lot of my own food. I have a 90-foot garden bed in my backyard. In my garden, I grow peaches, cherries, blueberries, strawberries, blackberries, sage, thyme, lavender, tomatoes, green beans, snap peas, and peppers. In the summer and fall, I spend at least ten hours a week gardening, and I also often do plant trades with my neighbors. I use herbs from my garden year-round and depending on the season, I consume crops from my garden every day. Gardening as an activity and being able to grow and eat my own food are both very important to me. It helps with my stress and anxiety by reminding me that things are outside growing and getting better every day. It also gives me a sense of self-sufficiency and agency, and I also find it is very beneficial for my digestive health.

9. However, if the Aries facility were to be built, I would be very concerned about pollution from the facility reaching my home and contaminating my soil. I would not want to live here anymore and until I could move out of Sanford, I would stop growing and eating any fruits, vegetables, and herbs from my garden.

10. I also consume locally harvested food from the community. I buy food from local farmers' markets and community farms such as Spillers' Farm. I would stop eating locally

harvested food if the Aries facility were to be built out of fear of contamination from pollution entering our local water and soil.

11. I receive my drinking water from the public water supply in Sanford, and I am concerned about exposure to pollution from the proposed Aries facility entering my drinking water supply.

12. I work from home most days of the week, and I spend a lot of my time working on my patio. I also frequent the downtown Sanford area multiple times a week. I am concerned about my exposure to air pollutants emitted from the facility considering how close my home is to the proposed site.

13. I recreate in areas downstream of the Mousam River, which would be the receiving water for discharges from the Aries facility. I often visit the Rachel Carson Wildlife Refuge for their trails and Kennebunk Plains Preserve, where I pick wild blueberries. The Rachel Carson Wildlife Refuge and Kennebunk Plains are located 1.5 miles and less than a mile away, respectively, from the Mousam River downstream of where the Aries facility would be built.

14. I am concerned about exposure from the Aries facility to PFAS and other harmful pollutants that are known to occur in sewage sludge. My husband and I have a family history of medical conditions that are linked to exposure to toxic chemicals. I have a family history of cancer from my grandma who had breast cancer and brain cancer. My husband's father also was diagnosed with very early onset dementia, and he is now in very poor health. My husband has asthma, and we are very concerned about how air pollution from the Aries facility could worsen his condition.

15. My husband and I are also trying to start a family, but if Aries were to proceed with its plan for a sludge gasification facility near our home, we would put this on hold because I do not

think this would be a safe place to carry a baby to term. I just turned 34, and this would be a very painful deferment.

16. If Aries were to build their facility in Sanford, I would do everything in my power to sell my house and move out of Sanford. In order to do that and afford a home in another town, I would likely have to change careers. The economic strain this would place on my husband's and my life would be tremendous, but I would not want to continue living here and be exposed to dangerous pollutants being emitted from the facility.

17. I have been experiencing stress and anxiety thinking about how this facility could be built so close to my home. In the past, I struggled with CPTSD (complex post-traumatic stress disorder) as a result of adverse childhood experiences—much of it being financial trauma stemming from growing up in poverty. I was regularly seeing a therapist, and I felt like I was getting to a good point with my mental health until I heard about these plans to build the sludge plant in our community. Since then, it has been hard to sleep at night because I have chronic stress dreams about this issue, and I often wake up exhausted. I have had to increase the frequency of therapy sessions from twice a month to weekly. This issue is omnipresent in my mind, and it dominates my conversations with many of my loved ones. I am so angry, upset, and afraid about how this Aries facility could poison and ruin my community.

18. I am very worried about the long-term impact on the community if the Aries facility is built. I am concerned that people would move away because they would see Sanford as a toxic waste zone. When I first moved here, Sanford was filled with empty or foreclosed homes, but over the years, I have seen many of those houses be bought up and filled. It has been great seeing such a boom of young families. People come to Sanford because it is an affordable place to build a life. The downtown area of Sanford has really grown too—restaurants are popping up and

staying open beyond a year and even boutique shops that I never would have thought would come to Sanford have opened up. This town already has a history of pollution and exploitation, and I have witnessed my community work so hard to overcome it. I fear if Aries' plans for this facility were to succeed, it would dampen this development, and that would be devastating. I am not only worried for my family, but also for the heart and soul of our community and all the families living in Sanford that would be harmed by these plans.

19. I understand that Aries must obtain an air emissions license and solid waste facility license from the Maine Department of Environmental Protection ("DEP") to construct its proposed facility in Sanford. Given my home's close proximity to Aries' project site, my health and property interests—as well as my interests in the welfare of my community—will be directly and substantially affected by the outcome of the DEP permit proceedings.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed this 6 day of May, 2026, in Sanford, Maine.



Nicole Tara Gorsun

**DECLARATION OF JOHN HENKELMAN
FOR CONSERVATION LAW FOUNDATION**

I, John Henkelman, hereby declare and state:

1. This declaration is based on my personal and professional knowledge, information, and belief. I am over the age of eighteen (18) years and suffer from no legal incapacity. I submit this declaration in support of Conservation Law Foundation's ("CLF's") intervention in the Maine Department of Environmental Protection air and solid waste facility permit proceedings.

2. I am a member of CLF. I became a member because of my deep concern over Aries' proposed gasification facility, and because I align with CLF's values and commitment to protecting safe and healthy conditions for the environment and people.

3. I live, with my wife and dog, in South Sanford near Bauneg Beg Pond, about three and a half miles from Aries' proposed facility. We moved here from Florida in 2022 because we love nature—it has been a breath of fresh air to see the stars, have clean air, and enjoy endless outdoor recreational opportunities.

4. I am thirty-eight (38) years old and I am competent to testify to all facts contained in this declaration.

5. I am a graduate student at the University of New Hampshire, pursuing a Ph.D. in Natural Resource and Environmental Studies. I have a M.S. from the University of New Hampshire in Recreation Management and Policy, B.S. in Biology from Palm Beach Atlantic University and I am an adjunct professor at the University of New England in the Environmental Studies program.

6. I spend most of my free time outdoors: canoeing, hiking, viewing birds, and cycling with my wife and our dog. I love paddling and fishing in the wetlands associated with Bauneg Beg Pond and the Mousam River, and biking the local trail systems along the Mousam River. I have been looking forward to biking a new proposed trail that would form a loop, connecting the downtown and greenway trails I currently use—this connector would pass immediately adjacent to the proposed Aries facility. Additionally, I enjoy fly fishing parts of the Mousam River that are downstream of the proposed Aries facility and that would be impacted.

7. I am passionate about water quality—I spent last summer paddling the entire length of the Hudson River to collect water quality data and I frequently test the water bodies in my area. PFAS contamination is of special concern to me ever since I assisted in a study in the Everglades that demonstrated how widespread

PFAS distribution is within watersheds. New England rivers have been historically abused, and it is important to me to protect and improve their water quality.

8. It is important to me and my wife to eat fresh local foods. Our entire front yard is a garden; I keep bees, we forage locally, and we shop in-season at local farms. One of the U-Pick berry farms we visit, Lavigne Strawberry Farm, is less than three miles from the proposed Aries facility. During the growing season, from June through October, our food is from these sources.

9. I am concerned that my activities and the access to a clean, healthy environment that I value about my home would be negatively impacted by the proposed Aries facility. My home is due south of the proposed facility, so any northern winds could send PFAS fallout, toxic chemical releases, and smells straight to my home and watershed. I use well water, so any impacts to water quality would impact my drinking water and potentially my health and my wife's health. Any PFAS or other toxic chemical contamination could impact the foods that I grow in my garden and purchase locally and could impact my ability to sell honey from my bees. This pollution could impact the health of my dog, the birds and wildlife I enjoy viewing, and my enjoyment in recreating on and along local bodies of water.

10. Because of these concerns, I am considering beginning to test local water bodies to establish a baseline. I have also lobbied the city council and other elected officials to ensure local voices and concerns are considered.

11. As a member of CLF, I am aware that advocacy to limit members' exposure to PFAS, toxic chemicals, and contaminated natural resources is a core part of CLF's work. This work is clearly important to me.

12. I am deeply concerned that the proposed facility would release PFAS and other toxic byproducts into the air, water, and waste streams, creating long-term health and environmental risks that aren't well understood or controlled.

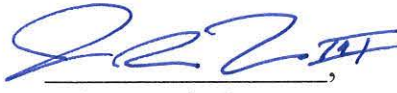
13. I am aware that Aries submitted applications for the solid waste processing facility permit on January 7, 2026 and for the air permit on January 28, 2026.

14. I understand that CLF seeks to intervene in the Maine Department of Environmental Protection air and solid waste facility permit proceedings to contest these permit applications.

15. Denial of Aries' permits would protect me from these potential harms. I therefore support CLF's intervention to contest Aries' permit.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on May 31, 2026.


John Henkelman

**DECLARATION OF SEAN MAHONEY
FOR CONSERVATION LAW FOUNDATION**

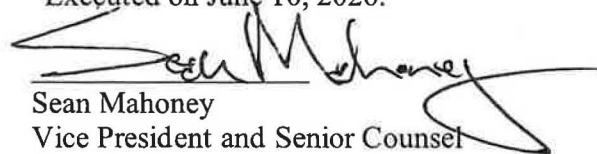
I, Sean Mahoney, hereby declare and state:

1. This declaration is based on my personal knowledge, information, and belief. I am over the age of eighteen (18) years and suffer from no legal incapacity. I submit this declaration in support of the Conservation Law Foundation's ("CLF's") Petition to Intervene as a party in Aries Pine Tree LLC's air emission license and solid waste processing facility license proceeding before the Maine Department of Environmental Protection ("DEP" or the "Department").
2. I am Vice President and Senior Counsel at CLF. I have held this position since 2007. In this capacity, I am familiar with CLF's mission, activities, and membership, as well as the environmental and public health issues that motivate CLF's advocacy.
3. CLF is a nonprofit, membership-based organization founded in 1966 and is the oldest regional environmental advocacy organization in the nation. CLF maintains offices in Maine, Massachusetts, New Hampshire, Rhode Island, Connecticut, and Vermont. CLF's mission is to protect New England's environment for the benefit of all people by using the law, science, and the market to preserve natural resources, build healthy communities, and sustain a vibrant economy.
4. CLF's membership consists of approximately 7,263 individuals, residing in all fifty states and the District of Columbia, with the majority of our members residing in the New England states of Maine, Massachusetts, New Hampshire, Rhode Island, Connecticut, and Vermont. CLF has approximately 517 members in Maine, including two members in Sanford. CLF maintains a digital membership database that includes members' addresses, which is regularly updated.
5. Protecting communities from exposure to toxics and contaminated natural resources is central to CLF's mission. For decades, CLF has advocated to reduce harmful exposures from industrial facilities, waste management operations, and other sources of environmental contamination that threaten public health, particularly in overburdened or vulnerable communities.
6. Through my work at CLF, I am aware of evolving scientific and regulatory responses regarding the handling and treatment of municipal sewage sludge, a waste stream that is widely known to contain per- and polyfluoroalkyl substances ("PFAS"), pathogens, heavy metals, and other persistent and hazardous contaminants.
7. I am aware that proposed facilities for thermal treatment of sewage sludge—including gasification—involve novel technologies and raise significant environmental and public health concerns. These concerns include, among other things:
 - a. The generation and discharge of PFAS-contaminated wastewater streams, including condensate, without enforceable PFAS monitoring or discharge limits;

- b. The potential release of PFAS and other hazardous contaminants to air in the absence of enforceable emission limits or routine stack testing requirements;
 - c. The creation of solid residuals, such as biochar, ash, or spent sorbents, that may contain concentrated PFAS or other persistent pollutants without clear, binding disposal or use restrictions; and
 - d. Risks of long-term contamination of groundwater, surface waters, and surrounding communities, particularly where facilities are sited over or near sensitive aquifers or connected water resources.
8. I am also aware that Maine and other New England states have documented significant environmental harm resulting from inadequate controls on PFAS-contaminated sludge that has affected drinking water and agricultural lands. These documented impacts underscore the importance of regulatory scrutiny, transparent monitoring, and meaningful public participation when a new sludge processing or disposal facility is proposed.
9. Through my work at CLF, I am aware that CLF members live in communities that could be affected by facilities that process or dispose of sewage sludge or manage waste streams contaminated with PFAS or other hazardous pollutants. These members rely on clean air, clean water, and safe disposal practices to protect their health, property, and quality of life.
10. If administrative proceedings result in insufficient environmental regulation of facilities that thermally treat biosolids, CLF members can face an increased risk of exposure to PFAS and other hazardous pollutants through air emissions, wastewater discharges, contaminated residuals, and long-term environmental degradation.
11. CLF therefore has a strong interest in ensuring that environmental decision-making for sewage sludge gasification and similar technologies is grounded in sound science and sufficient safeguards, with meaningful opportunity for public input. CLF's intervention in this action is needed to protect the health, safety, and environmental interests of its members, some of whom reside within a few miles of the proposed Aries facility.
12. I make this declaration in support of CLF's intervention for the benefit of its members and in furtherance of CLF's mission to safeguard public health and the environment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2026.


Sean Mahoney
Vice President and Senior Counsel
Conservation Law Foundation