

**From:** [Cheryl Robertson](#)  
**To:** [Burke, Ruth A](#)  
**Subject:** Chapter 400 Rule Change Comment  
**Date:** Monday, September 28, 2020 11:30:20 AM  
**Attachments:** [IMG\\_3287.JPG](#)

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Chairman Draper and members of the BEP:

I am a resident of Orono, and a member of Orono Town Council, Chair of our Environment Committee. While I do not speak for Council in this comment, I was on the Hearing call on Sept. 17th, and I approve of the rule and language change that finally *discontinues* the practice of allowing out-of-state toxic debris to be trucked to Juniper Ridge Landfill. This practice that threatens our river, our homes and our ability to create and maintain healthy communities.

The hearing prompted several questions that remained unanswered, and I would like to pose them now as part of my final comment, the first being my understanding that a Rule Change petition is certainly allowable in front of this committee and can challenge some substantive misleading language; however, one argument I heard as push back from the Board, was that it cannot change statutory legislation. Why, then, did the board proceed and even hear this people's petition if there was no mechanism in place to grant a reversal or change?

Secondly, it is curious to me why this particular statutory language was permitted to be written by the agents who would profit the most from trucking tons of out-of-state debris to West Old Town? Where is the oversight? Forgive me, but does the term "Protection" in Board of Protection mean the profiteers or the environment or even the people who reside on the fringes of this hazardous situation that threatens our health, our wildlife and our ability to enjoy the Penobscot River?

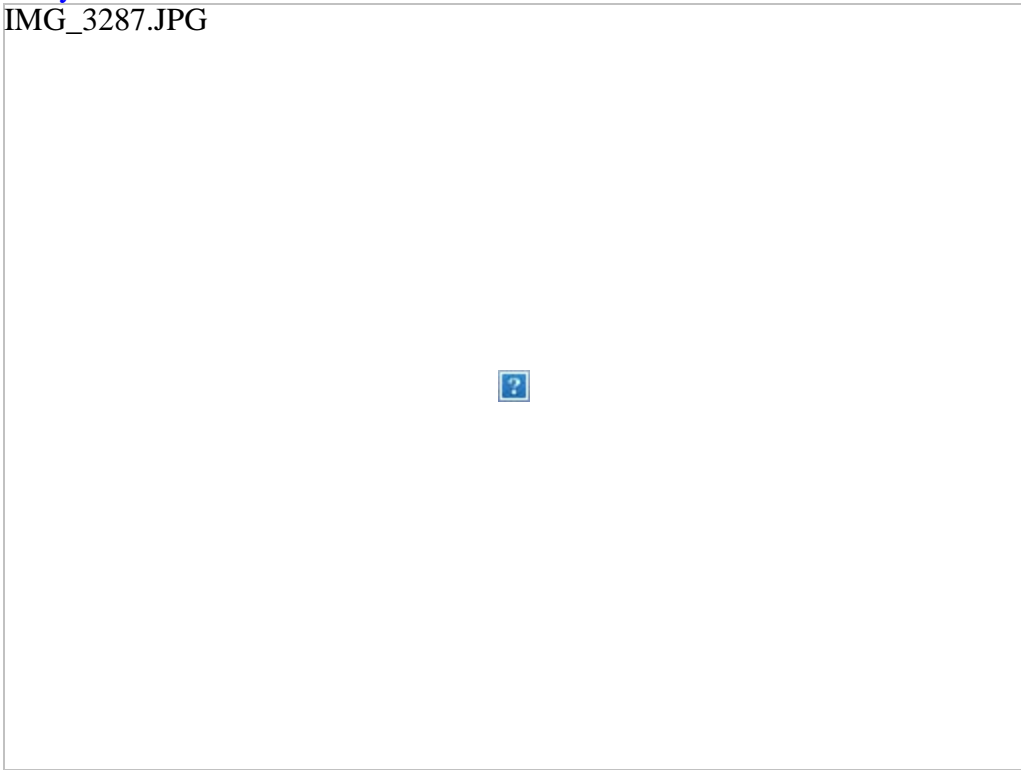
I live ten minutes from Juniper Ridge, pictured below. I provide a largely volunteer service to my community - I present information and data to a municipality who is committed to reducing our environmental footprint and I align that data information with our Comprehensive Plan and Maine's Climate Council recommendations. The GHG emissions from JRL using demolition debris, arsenic treated wood, PFAS as cover does not support the state's goals of reduced GHG - and the argument that continued use of construction waste is going to stabilize sludge deposits is not a permissible use from an environmental standpoint.

I was very vocal on my objections to the Casella agreement between the 115 municipalities using JRL as a bypass when Fiberright/CRM was down (it was down more months than it was running at capacity) and I am very concerned, now, about the added stress on JRL, heavy trucks on our roads, and under treated leachate going right back into the Penobscot. Please consider that we are Maine, we are people who *value* the landscape and waterscape and air. Loopholes in statute that allow anything less than a great reverence for our state, should be reconsidered, re-evaluated and rewritten.

Thank you for your time and consideration.  
Stay safe,

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A backhoe on top of the JUNIPER RIDGE LANDFILL from Rt.16. Can now be seen from I95.