

**City of Brewer
Finance Department**



**Karen M. Fussell
Finance Director**

March 7, 2018

Ms. Kathleen Tarbuck, Solid Waste Program Manager
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017

RE: Juniper Ridge Landfill Amendment Application #S-020700-WD-BL-A
Continued Acceptance of In-State Municipal Solid Waste

Dear Ms. Tarbuck:

As a municipality responsible for waste disposal from all domestic and commercial sources within our borders in accordance with 38 M.R.S. 1305(1), we have relied on the MRC to assist us in our continued desire to develop a new regional processing facility that complies with Maine's Solid Waste Management Hierarchy and provides affordable, reliable and environmentally sound recycling, processing and disposal of municipal solid waste.

The MRC had a huge hill to climb in identifying and selecting an effective processing technology; implementing agreements between MRC, Fiberight and over 100 communities; securing the necessary permits and participating in the subsequent appeal process; arranging and contracting disposal capacity for residuals and bridge/bypass; supporting Fiberight's financing about \$70 million to develop the facility; and now carrying out the facility construction process. Even though we have completed much of this process, we anticipate having a gap of at least several months (bridge capacity period) after our agreement with PERC expires on March 31, 2018 and before the Fiberight facility is able to accept Brewer's waste.

As we understand, the MRC has an agreement with PERC, contingent on third party consent, to continue processing waste past April 1, and even use their tip floor if they are unable to process the waste, but the disposal capacity that has been secured is at Waste Management's landfill in Norridgewock.

If the JRL amendment is not approved, and the PERC facility cannot be used, our community is in jeopardy of not being able to transfer our waste from our residential curbside packer trucks to the trailer trucks that are needed to transport the waste to

Norridgewock. The same infrastructure constraint applies to an even greater quantity of MSW generated from commercial sources collected by packer trucks. As you know, a licensed transfer station is necessary to conduct this type of operation, and we do not have access to this type of facility in our community or region. However, even if any such facility had been licensed and developed, its functional obsolescence in 2 years or less would have been an unwise use for local taxpayer dollars that instead are available for utilization in support of the long-term success of the new processing facility.

Approval of the JRL amendment is critical to ensuring our waste has place to go until the Fiberright facility is operational. We are hopeful that Waste Management will provide its consent and that PERC can continue to process our waste during the bridge period. However, consent has not yet been granted and, even if it is, given the changed waste landscape post April 1, there is a real possibility PERC may not weather the transition to lower waste volumes.

This aspect of the transition to the new Fiberright facility is another important reason to approve the JRL license amendment.

Thank you for your consideration.

Sincerely,



Karen M. Fussell
Finance Director