

Maine Resource Recovery Association



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Julie Churchill, Project Manager
Maine Department of Environmental Protection
Ray Building, 28 Tyson Drive
Augusta, Maine 04333

Dear Ms. Churchill,

The Maine Resource Recovery Association (MRRRA) expresses its full support for the Municipal Review Committee (MRC) / Fiberight licensing application currently under review by the Maine Department of Environmental Protection. MRRRA sees several significant benefits of this proposal for both the MRC communities and the State of Maine as a whole.

Maine's adopted Solid Waste Hierarchy lays out a progression of methods with the ultimate goal of reducing reliance on landfills. The MRC/Fiberight project supports the Solid Waste Hierarchy to a much greater extent than any system proposed thus far in the State of Maine.

1. The MRC/Fiberight proposal promotes local recycling and further encourages it by providing a single sort recycling facility associated with the plant thus providing much needed access for an underserved region of the State. This can allow interested communities to redirect their focus on other worthy endeavors such as diversion and re-use of various waste streams, as well as, composting of yard wastes.
2. The Fiberight process provides a second pass at the waste stream for recoverable recyclables, expecting to recover an additional 20% by weight as high quality (washed) commodities. This process ensures capture of resources left behind by even the very best local recycling programs.
3. The Fiberight process exceeds current recovery and recycling strategies by capturing and managing virtually 100% of the organics in the waste stream and converting those food wastes into biogas.

Moreover, MRC/Fiberight project takes diversion another step further with the addition of an enzymatic hydrolysis process which will recover insoluble organics as short chained sugars which initially will be turned back towards production of biogas. This product can then be used as fuel for transportation, heat and electrical production. The value here is significant when one considers that this biogas product will actually displace fossil fuels wherever it is used.

While some promote the large scale composting of food wastes, it is the MRRRA's opinion that, at best, stand alone composting solutions would capture only a portion of these materials. It is our experience to expect contaminants contained in the waste stream. These inevitable contaminants then result in only a marginally desirable compost product with limited and mostly industrial uses. A different argument could be made if the agronomic nutrient value was expected to be significant, but it is not. Please consider the following link of a study comparing digestion and composting.

<http://www.renewablesinternational.net/biogas-generally-better-than-composting/150/515/33468/>

Additionally, MRRRA believes that with a project such as the proposed MRC/Fiberight facility in place, beneficial spin-offs will occur:

1. Facilitation of a higher standard for the State of Maine in the areas of waste tire management, textile management and glass/mineral management among others. As these materials are separated from the waste stream early and aimed at various markets other than incinerated or land filled.
2. Moderating impact on disposal/ processing costs for the region through revenue sharing for member municipalities.
3. Increased financial resources to further support other municipal solid waste management practices/advancements including development of a more efficient transportation infrastructure for wastes.

In summary, MRRRA holds that the MRC/Fiberight proposal meets the licensing criteria set forth by the Maine Department of Environmental Protection by exceeding the State of Maine Solid Waste Hierarchy and long-term materials management goals. As an organization of MSW professionals, we give the MRC/Fiberight application our full support.

Thank you for your consideration of these comments.

Respectfully Submitted,



Victor Horton
Executive Director
Maine Resource Recovery Association