

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

July 10th, 2018

James Parker W. Parker, Chairman
Maine Board of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Re: NEWSME Landfill Operations (NEWSME) and Bureau of General Services (BGS) appeal of the Juniper Ridge Landfill (JRL) Partial Approval with Conditions (License #S-020700-WS-BL-A).

Dear Chairman Parker:

Enclosed please find the comments of Coastal Resources of Maine LLC with regards to the above captioned appeal of the Juniper Ridge Landfill (JRL) Partial Approval with Conditions (License #S-020700-WS-BL-A).

On November 10th 2017 we, Coastal Resources of Maine (CRM), and Pine Tree Waste (PTW), Inc, a division of Casella Waste, entered into an agreement whereby PTW would bring waste to our waste processing facility currently under construction in Hampden, ME.

This agreement is important to CRM because notwithstanding a commitment to provide waste to our facility from the immediate region, it resolves questions surrounding waste flow-control, and affords CRM the ability to bring in off-peak waste from in-state sources during the winter in order to balance production in a state which experiences peak summer generation. However, CRM's waste supply agreement with Pine Tree Waste is co-terminus with the approval for the Juniper Ridge Landfill ["JRL"] being licensed and able to accept at least 81,800 tons of Maine MSW annually.

On April 1st 2018 CRM, MRC, Waste Management and Casella entered into a "waste swap" agreement that allowed for waste flows to be managed and directed to the closest disposal facility while construction at our facility was ongoing. Were it not for this agreement, there would have been insufficient infrastructure in place to afford collection and transfer of waste, resulting in hardship to numerous communities.

What is evident by the waste swap agreement is that private industry worked cooperatively with the public sector to make available existing disposal infrastructure in a manner that benefitted the community. This agreement is currently in place and providing an invaluable service.

What is also evident is that our waste processing facility, while holding the promise to significantly improve recycling and environmentally sound waste management in the state of Maine, relies on a

broader disposal infrastructure. This infrastructure includes Crossroads landfill as well as Juniper Ridge landfill because the communities we serve are geographically diverse, and we need immediate bypass options for them in the case of process interruption or construction delays.

Therefore we support NEWSME Landfill Operations' (NEWSME) and Bureau of General Services' (BGS) appeal for the following reasons

- CRM, and our Hampden facility would be harmed by the loss of 40,000 TPY of waste which is conditioned upon JRL being permitted to accept MSW. We would lose both the revenues associated with this volume, and the ability to keep our facility operating efficiently during winter months.
- MRC communities would be harmed by the loss of the waste because our rebate structure is based on top-line revenues that would be reduced by lower waste volumes.
- The waste swap agreement, and three months of successful experience under its terms, has shown the need for disposal contingency that aligns with available collection and transfer infrastructure. Please note that continuation of the waste swap is subject to approval by both Waste Management and Casella.
- CRM is dedicated to the success of our project and is placing a \$70M investment behind that success. We do however recognize that there will be times when we need to optimize processes, repair parts, and deal with unknowns. We, and our municipal customers are assured of the best chances of success if we are able to deal with these events in a disciplined manner without undue pressure caused by waste piling up at our facility. Thus bypass capacity is a critical need for CRM.
- A one-year extension places stress on the project and may cause different decisions upon CRM when faced with a short-deadline. An example of this would be focusing on volume throughput rather than focusing on maximizing recycling and diversion during the project's commissioning and optimization stages. A continuing lack of local collection and transfer infrastructure would inevitably cause CRM to focus on the former concern, therefore we support extension of the aforementioned approval through 2023.

Sincerely,



Craig Stuart Paul
Manager, Coastal Resources of Maine LLC
CEO Fiberight LLC