

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

March 29th, 2018

Ms. Kathy Tarbuck, Project Manager
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Re: Juniper Ridge Landfill Amendment Application #S-020700-WD-BL-A
Comments on Draft Amendment License

Dear Ms. Tarbuck:

Enclosed please find the comments of Coastal Resources of Maine LL on the Draft Amendment License. We restate and affirm comments from our February 20th letter, to whit:

“CRM’s intent is to commission its MRF in Q2 2018, ramping up to approximately 55,000 equivalent annual tons when fully commissioned. In parallel with the MRF commissioning we will be constructing the downstream processing elements of the facility, including anaerobic digestion, which take longer to construct. We anticipate having the plant fully commissioned in Q4 2018, at which time we will process the entire 105,000 tons committed to the project by MRC.

It is CRM’s further intent to take several months to shake-down and optimize the facility, thus we anticipate a 3rd ramp-up in Q1-2 2019 at which time we will commence accepting waste from Casella and other 3rd parties. If and to the extent the MRC elects to bring additional tons from communities who may elect to re-sign with MRC, CRM would incorporate such new tonnage as directed by MRC.

The MRC had prepared for the eventuality that the CRM Facility might not be ready to accept MSW by April 1, 2018. In particular, in 2015, the MRC and Waste Management, Inc. [“WM”] had entered into an agreement pursuant to which, in the event the CRM Facility in Hampden could not accept MSW as of April 1, 2018, such MSW would be delivered to the Crossroads Landfill for disposal. At that time it was recognized that practically, MSW could not be delivered directly to the Crossroads Landfill from certain MRC communities (e.g., Bangor, Brewer).

These communities are close to the Coastal facility in Hampden, but remote from the Crossroads Landfill in Norridgewock. Further, the prevailing MSW collection method in these communities is by packer truck or other small vehicles not intended to travel significant highway distances to remote disposal facilities. Notwithstanding increased costs, the current level of collection infrastructure available to these communities is insufficient to both collect waste and deliver it to Crossroads; adequate new assets cannot be placed into service by April 2018 to remedy this critical concern. Thus, the WM agreement contemplated being able to use the Coastal Facility or adjacent areas on the site as a transfer station where MSW could be accepted from such MRC communities and transferred to trailers for delivery to the Crossroads Landfill.

Through subsequent events, it became evident that the Coastal Facility and site could not be used as a transfer station as originally anticipated, for reasons that include, among other things, opposition from the Town of Hampden to such use.”

MRC, CRM and Casella have been working cooperatively over the past four months to address the uncertainty and potential disruption to the region’s municipal solid waste management system, which disruption would be solved by the successful commissioning of our waste processing facility in Hampden, ME. We do however request the department consider extending the approval term from the current one year noted in the draft permit for the following reasons;

- 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. CRM views this agreement as beneficial to the success of its project.
- 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.
- There is still uncertainty as to the long-term role of PERC in the region’s disposal infrastructure. While CRM is engaged with PERC on potential long-term cooperative ventures, PERC may elect to close its operations. In this case, the capacity and focus of our Hampden operations would be challenged in the absence of a local disposal option to afford diversion of commercial wastes that are not otherwise contracted by CRM and MRC to be disposed of at Crossroads Landfill in Norridgewock, ME.

Notwithstanding the above, we recognize that the Department has many issues to consider and many voices to hear. We applaud the Department for the level of work and communication evident in the draft Amendment License.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Stuart Paul', with a large, stylized flourish at the end.

Craig Stuart Paul

Manager, Coastal Resources of Maine LLC
CEO Fiberight LLC