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Letter requesting Intervenor Status: #HQH-D4D1-RJBRR

Dear Mr. Mangeon,

I am submitting a formal request for Intervenor Status at the planned Public Hearing on the Juniper Ridge Landfill expansion proposal. I am a reproductive healthcare professional with over 25 years of service caring for pregnant and reproductive age women and a resident of on French Island in Old Town, on the banks of the Penobscot River. I am entitled to Intervenor status because I am a person and member of a class which is and will be substantially and directly affected by the proposed expansion. Issues of Contention regarding the application before the Department include:

- (1) The DEP's deliberations to date have been entirely inadequate regarding the multiple routes by which JRL is impacting public health. Landfills are known repositories of forever chemicals including PFAS, dioxins, and PCBS, PFAS, dioxins, and PCBs, all known carcinogens, endocrine disrupting chemicals, and reproductive toxins. Juniper Ridge has a legacy of receiving mill waste as well as sludge, mixed garbage, and highly toxic construction debris, containing all of these chemicals (and more). There are multiple routes by which toxins stored at landfills can diffuse out from it to poison our environment and impact public health, including blowing dust, smoke from flares and landfill fires, water pollution, and vector transmission through birds and animals who feed at landfills.¹⁻³ DEP has failed to monitor and to mitigate multiple routes of exposure and to address these in its review of this application. In addition to directly pouring leachate into the river, the chemicals described above are likely being transferred off site from JRL in blowing dust, surface runoff, and in smoke from a 2023 fire at JRL which blanketed our community with toxic smoke. [Juniper Ridge Landfill's Neighbors Want Action Following Landfill Fire Monday Night – Sunlight Media Collective.](#)
- (2) Leachate from JRL containing a complex mix of poisons is poured relatively untreated into the Penobscot River at the Nine Dragons mill site. Sampling of JRL leachate shows it contains very elevated levels of PFAS. In 2023, millions of gallons of leachate were expelled into the Penobscot River. Testing the same year showed that JRLs leachate had a sum pf 6 regulated PFAS more than 100 times higher than the state's drinking water standard. The proposed expansion of 61 acres would increase the size of JRL by half again, and the volume of leachate sent to Nine Dragons and into the Penobscot River would also greatly increase. Despite PCBs and dioxins being grounds for state advisories to avoid eating fish, DEP has not reported testing for these compounds.
- (3) The potential significance of this combination of exposures to a complex mix of hazardous chemicals for those who are exposed is profound. PFAS, PCBs, and other high toxicity "forever chemicals" bioaccumulate and are also not easily eliminated from the human body. Human health is already suffering in Penobscot county as a result of environmental exposures. According to the Centers for Disease Control, Penobscot County has the highest rate of thyroid and cervical cancer in the state; lung cancer rates and deaths for Penobscot county are higher than for Maine as a whole, and much

higher than the US overall;⁴ and Penobscot County is also in the highest quintile for bladder and uterine cancer compared to the rest of the state. These cancers are all associated with environmental exposures through contaminated air and water.⁵ High rates of uterine and thyroid cancer are also highly concerning markers for disruption of reproductive hormones.

- (4) None of the human health concerns described above are being monitored or mitigated by DEP with regards to JRL, and are not addressed in any meaningful way in the State's so-called Public Benefit Determination. This is a serious deficiency, especially with regards to the review of the JRL expansion proposal. The Public Benefit statute and regulation define environmental justice as the right to be protected from environmental pollution and to live in and enjoy a clean and healthful environment regardless of ancestry, class, disability, ethnicity, income, national origin or religion. The process followed by DEP- especially ignoring the very real challenges to the PBD and moving forward with a Public Hearing on the permit application- shows complete disregard for this directive.

All of us living downstream and downwind are at risk from the environmental toxins released from JRL. The DEP's review of public health burden has been entirely inadequate, reflecting DEP's wholly inadequate monitoring of JRL's public health and environmental impact. I am able and intend to participate in any and all proceedings to support my listed contentions, that expanding JRL will impact the health and wellbeing of my family, as well as that of my neighbors in French Island, Indian Island, and regionally as described above. I intend to elicit expert testimony from environmental toxicologists and epidemiologists in support of this contentions.

At age 63, I am a reproductive system cancer survivor. My oncologist said she was surprised that I had uterine cancer at such a young age, without any family or genetic history of hormonally related cancers, or any personal or medical risk factors. The remaining explanation for why this happened is exposure to endocrine disrupting chemicals from environmental exposures. I also have reproductive age children and likely will have grandchildren who live in Old Town. The deliberations made regarding expanding Juniper Ridge Landfill, which is both a repository for and a source of forever chemicals diffusing through our environment, impacts all of us. I look forward to participating as an intervenor with regards to #HQH-D4D1-RJBRR.

Respectfully submitted,



Daisy Goodman, DNP, MPH, CNM

Citations

1. Sunderland EM, Hu XC, Dassuncao C, Tokranov AK, Wagner CC, Allen JG. A review of the pathways of human exposure to poly- and perfluoroalkyl substances (PFASs) and present understanding of health effects. *Journal of exposure science & environmental epidemiology*. 2019;29(2):131-147. doi:10.1038/s41370-018-0094-1
2. Schroeder, T., Bond, D, Foley, J. PFAS soil and groundwater contamination via industrial airborne emission and land deposition in SW Vermont and Eastern New York State, USA *Environ. Sci.: Processes Impacts*, 2021, 23, 291
3. Paris-Davila T, Gaines LGT, Lucas K, Nylander-French LA. Occupational exposures to airborne per- and polyfluoroalkyl substances (PFAS)—A review. *American journal of industrial medicine*. 2023;66(5):393-410. doi:10.1002/ajim.23461
4. [2025 Penobscot County Report Final 5.9.25.pdf](#)
5. [Interactive Maps](#)