



May 21, 2026

Ronald Mongeon, Presiding Officer
c/o Dominique DiSpirito, Waste Management Project Manager
Bureau of Remediation and Waste Management
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Via Email: JRLhearing.DEP@maine.gov

**RE: Petition for Leave to Intervene – Juniper Ridge Landfill Expansion
Application #HQH-D4D1-RJBBR**

Dear Presiding Officer Mongeon:

Pursuant to 5 M.R.S. § 9054 and Chapter 3, § 11(A) of the Maine Department of Environmental Protection Rules Governing the Conduct of Licensing Hearings, Penobscot Bay Waterkeeper hereby petitions for leave to intervene in the adjudicatory hearing concerning the proposed expansion of the Juniper Ridge Landfill in Alton and Old Town, Maine.

1. Identification of Petitioner

Penobscot Bay Waterkeeper is a Maine-based nonprofit environmental organization dedicated to protecting, restoring, and defending the waters of Penobscot Bay and the larger Penobscot River watershed. The organization works to safeguard water quality, aquatic ecosystems, public health, fisheries, and community interests throughout the watershed through advocacy, monitoring, public education, research, and participation in environmental permitting and enforcement matters.

Penobscot Bay Waterkeeper's members, supporters, and constituents reside throughout the Penobscot River and Penobscot Bay watershed and use affected waters and surrounding natural resources for recreation, fishing, cultural practices, scientific study, aesthetic enjoyment, and economic livelihoods.

Provide specific examples of members and supporters who live in the watershed including their address and impacts/exposure to impacts.

Penobscot Bay Waterkeeper has hundreds of members and supporters who utilize the Penobscot River and Bay to support their livelihoods and enjoyment through recreational activities and experiencing the natural world. A sample of those individuals include:

- a. **Foster Bartovics**, Fisherman /Lobsterman (Penobscot Bay). 16 Iron Point Rd., North Haven, ME 04853: Concerned about harm from pollution exposure and impacts to his livelihood and the fishery.
- b. **Zebediah Campbell**, Oyster Farmer/ Scallop Harvester (Penobscot Bay). 134 West District Rd., North Haven, ME 04853: Concerned about impacts and harm to his livelihood and the fishery.
- c. **Michael Kersula**, Oyster Farmer (Penobscot Bay). 37 Gleeson Mill Rd., Belfast, ME 04915. Concerned about impacts and harm to his livelihood and the fishery.
- d. **Logan Perkins**, Recreational Canoeist on Penobscot River. 577 Town House Rd., Swanville, ME 04915. Concerned about water quality and potential personal harm while paddling on the Penobscot River.
- e. **David Black**, Lobsterman (Penobscot Bay). 186 Northport Ave., Belfast, ME 04915. Concerned about harm from the impacts to water quality and to his livelihood as well as the lobster fishery.

2. Effect of the Proposed Activity on Petitioner

The proposed expansion of the Juniper Ridge Landfill may substantially and directly affect the interests of Penobscot Bay Waterkeeper and its members through potential impacts to groundwater, tributaries, wetlands, the Penobscot River system, and downstream waters connected to Penobscot Bay.

The organization has significant concerns regarding the generation, transportation, treatment, and discharge of landfill leachate associated with expanded landfill operations, including the contribution of PFAS, PCBs, dioxins, mercury--for which the Penobscot River is already impaired--and other persistent contaminants to cumulative pollution burdens within the Penobscot watershed. Existing information indicates that large quantities of landfill leachate generated at Juniper Ridge are transported to wastewater treatment facilities only partially treated and ultimately discharged into the Penobscot River system. The existing POTW treating and discharging leachate provides only conventional treatment and has limited capacity. Further, the NPDES permit for those discharges conducted no Reasonable Potential Analysis (RAP) for PFAS or other toxic and bioaccumulative pollutants associated with landfill leachate, fails to monitor for those pollutants, and includes no effluent limits for those pollutants. The proposed expansion would substantially increase landfill capacity, increase long-term leachate generation and contaminant loading, and will further contribute to the impairment of the Penobscot River System, in violation of the Clean Water Act.

Penobscot Bay Waterkeeper is additionally concerned that existing analyses may underestimate environmental and public health impacts by relying on assumptions that do not adequately account for communities and populations with heightened dependence on fish consumption and river resources, including tribal sustenance practices historically associated with the Penobscot River watershed.

The proposed expansion also raises concerns regarding cumulative environmental burdens already experienced by communities within the watershed, including exposure to wastewater discharges, landfill impacts, toxic pollutants, air emissions, and emerging contaminants. These cumulative impacts are particularly relevant given longstanding fish consumption advisories and documented contamination concerns involving PFAS, mercury, dioxins, PCBs, and other persistent bioaccumulative pollutants within the Penobscot River system.

As an organization dedicated to the protection of watershed health and public trust resources, Penobscot Bay Waterkeeper and its members may be substantially and directly affected by the Department's decision regarding this application.

3. Specific Contentions Relevant to Licensing Criteria

Penobscot Bay Waterkeeper seeks to participate regarding issues relevant to the licensing criteria contained in Maine's Solid Waste Management Rules, including Chapters 400, 401, and 405, including but not limited to the following:

a. Groundwater and Surface Water Protection

Whether the applicant has adequately demonstrated that the proposed landfill expansion will avoid unreasonable adverse impacts to groundwater, wetlands, tributaries, and downstream surface waters, including impacts associated with leachate migration, stormwater runoff, and emerging contaminants such as PFAS.

b. Leachate Treatment, Disposal, and PFAS Management

Whether the proposed systems for collection, transportation, storage, treatment, and discharge of landfill leachate are adequately protective of receiving waters and publicly owned treatment works, including cumulative impacts associated with PFAS and other contaminants contained in landfill leachate.

Penobscot Bay Waterkeeper is particularly concerned that currently available treatment technologies may not fully remove or destroy PFAS compounds and may instead transfer contaminants into secondary waste streams requiring additional management. Questions also remain regarding the effectiveness of treatment technologies for short-chain PFAS compounds and other persistent contaminants associated with landfill leachate.

c. Incomplete Contaminant Evaluation

Whether the Department has adequately evaluated the full range of contaminants potentially associated with landfill leachate and wastewater discharges, including short-chain PFAS

compounds, dioxins, PCBs, furans, heavy metals, and other toxic substances associated with fish consumption advisories and bioaccumulative risk within the Penobscot River watershed. These concerns are exacerbated by the fact that the present NPDES permit for discharge from the POTW conducted no RAP to evaluate the broad spectrum of potential discharged pollutants.

d. Cumulative Environmental Burdens and Environmental Justice

Whether the Department has adequately evaluated cumulative environmental burdens borne by affected communities within the Penobscot watershed, including existing landfill impacts, wastewater discharges, toxic contamination, and long-term public health concerns. The proposed expansion of the Juniper Ridge Landfill risks further polluting the Penobscot River system—a river system that is already impaired for mercury, dioxins, e. coli, and PCBs. See Maine 2018/2020/2022 Integrated Water Quality Monitoring Assessment Report.

The organization is concerned that generalized comparisons or narrow pollutant analyses may fail to adequately account for the unique ecological, cultural, subsistence, and public health relationships associated with the Penobscot River and downstream waters.

e. Public Health and Fish Consumption Risks

Whether the Department has adequately considered the implications of contaminant bioaccumulation in fish and aquatic species relied upon by communities within the watershed, including whether risk analyses appropriately reflect populations with higher fish consumption rates and long-standing cultural and subsistence relationships to the river.

f. Climate, Odor, Air Quality, and Long-Term Environmental Impacts

Whether the Department has adequately evaluated greenhouse gas emissions, landfill gas management, odor impacts, climate resilience, truck traffic, and the cumulative long-term environmental consequences associated with continued landfill expansion.

g. Alternatives and Consistency with Maine Waste Policy

Whether the proposed expansion is consistent with Maine's waste management hierarchy and state policies favoring waste reduction, recycling, composting, sludge reduction, diversion, and alternatives to long-term landfill expansion.

h. Long-Term Financial Assurance and Post-Closure Obligations

Whether the applicant has adequately demonstrated sufficient financial assurance and long-term planning for monitoring, maintenance, closure, corrective action, treatment system operation, and remediation throughout the operational and post-closure life of the facility.

4. Spokesperson

The spokesperson for Penobscot Bay Waterkeeper is:

Pete Nichols, Penobscot Bay Waterkeeper
PO Box 113, Belfast, ME 04915
pete@penbaywaterkeeper.org / 707-845-0832

5. Ability to Participate

Penobscot Bay Waterkeeper has the organizational capacity, expertise, and interest necessary to participate meaningfully in these proceedings. The organization intends to review application materials and technical submissions; participate in procedural conferences; submit written testimony, comments, and exhibits; present witnesses where appropriate; and comply with all procedural orders established by the Presiding Officer.

Penobscot Bay Waterkeeper respectfully requests full intervenor status to ensure adequate representation of watershed protection, public health, environmental justice, and downstream water quality interests implicated by the proposed landfill expansion.

Thank you for your consideration of this petition.

Respectfully submitted,



Pete Nichols
Penobscot Bay Waterkeeper

Dated: May 21, 2026