



March 16, 2023

Commissioner Melanie Loyzim  
Office of the Commissioner  
Maine Department of Environmental Protection  
32 Blossom Lane  
Augusta, Maine 04333-0017

Chair Stacy Brenner  
Environment and Natural Resources Committee  
Maine Legislature  
100 State House Station  
Augusta, ME 04333

Dear Commissioner Loyzim, Chair Brenner, and Members of the Environment and Natural Resources Committee:

We write on behalf of Just Zero to urge you to reject efforts by Casella Waste Systems to overturn, weaken, or create loopholes in legislation passed last year related to waste management. Casella has repeatedly argued that the passage of LD 1639 and LD 1911 has created a sewage sludge management crisis – a claim that is unfounded, self-serving, and dangerous.

Just Zero is a non-profit advocacy organization, with staff in Maine, that works alongside policy makers, scientists, organizers, and others to implement just and equitable Zero Waste solutions. We stand in partnership with Maine as it pursues Zero Waste solutions that reduce toxic waste streams that threaten our environment and perpetuate per-and-polyfluoroalkyl substances (PFAS) pollution. Just Zero encourages Maine to continue that good work, rather than give in to exploitative tactics of a company that profits off a broken and unsustainable waste management system.

Last year, the Maine Legislature passed two important laws that protect public health and the environment from the negative impacts associated with unmitigated and improper waste management. The first, LD 1639, closed a loophole that Casella and others were exploiting to dispose hundreds of thousands of tons of out-of-state waste – mostly construction and demolition debris and bulky waste – at the state-owned Juniper Ridge Landfill. The second, LD 1911, banned the land application of sewage sludge and compost-derived sludge – a practice that has contaminated fields, wells, crops, and livestock across the state. LD 1911 arose from the growing evidence that farms where sludge was spread as a fertilizer were contaminated with PFAS.

Casella has repeatedly argued, without justification, that these laws have created a sludge management crisis. Casella claims that it needs out-of-state bulky waste and construction and demolition debris to stabilize sludge before it can be safely landfilled. Casella has never adequately explained why this out-of-state waste stream is the only material that it can use to stabilize sludge.



In the short term, Casella can and should continue to landfill sludge. Landfills across the country have been accepting sludge with municipal wastes for decades. Sludge-to-landfill co-disposal and mono-disposal are not new ideas or unknown management practices. With regard to sludge “stabilization,” there are many options apart from the use of out-of-state bulky waste. Again, this is not a new challenge. During a March 8, 2023, Committee on Environment and Natural Resources hearing, the Department of Environmental Protection (Department) said they had identified in-state materials that could be used as a bulking agent.

In the long term, Maine should evaluate sludge drying and dewatering options. Drying or dewatering sludge improves the efficiency of handling and compacting sludge, which makes the material easier to manage. Moreover, the more digested the sludge is the more compressible it is. The Department should collect data on mechanical dewatering, drying beds, thermal drying processes, sludge thickening, and digestion processes at the state’s municipal wastewater treatment plants, if it has not already done so, to better understand individual plant needs.

In addition, Maine should explore the feasibility of integrating promising anaerobic side-stream processes into the existing wastewater treatment system to reduce the amount of sludge generated. These processes, which have been tested to scale, can help reduce the amount of sludge generated by more than 70 percent. This will reduce a complicated and toxic waste stream and minimize the need for landfills.

Casella’s abrupt decision to cease landfilling sludge is a blatant bullying tactic designed to undo important legislation enacted to protect the environment and the health of Maine’s residents. Maine has shown tremendous leadership when it comes to developing responsible and circular waste management systems. The state passed the first Extended Producer Responsibility for Packaging law in the country and has passed strong legislation phasing out PFAS from everyday household products. Maine should not bow to a multibillion-dollar waste company just because it is contracted by the state to manage the Juniper Ridge Landfill. Instead, Maine should look at short and long-term options to reduce the amount of sludge generated and responsibly manage what remains.

Thank you for your time.

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