



ReEnergy Lewiston
38 Alfred A Plourde Pkwy
Lewiston, ME 04240

P: (207) 783-2941
F: (207) 784-9852
www.reenergyholdings.com

**Comments of ReEnergy Lewiston
Oct. 18, 2016
Submitted to
The Board of Environmental Protection
Regarding
Juniper Ridge Landfill Expansion
DEP Applications #S-02077-WD-BI-N & #L-024251-TG-C-N**

Introduction and Qualifications

I appreciate having the opportunity to address you regarding the matter of the expansion of the Juniper Ridge Landfill. My name is Richard Geisser, and I am the manager of the recycling division of ReEnergy Holdings. I have more than 30 years' experience in the waste industry, most recently at Stericycle/Healthcare Waste Solutions as director of operations, where I oversaw medical waste collection, transportation and processing. Prior to that, I held various management positions in the field of solid waste, waste-to-energy, recycling and metals processing. I earned a bachelor's degree in civil /environmental engineering from the University of Rhode Island and a master's degree in environmental engineering from the University of Illinois at Urbana-Champaign.

I have worked at ReEnergy Holdings for approximately four years, where I oversee the operation of four facilities that process and recycle construction and construction and demolition material.

ReEnergy's recycling division owns and operates four processing facilities in New England: One in Lewiston, Maine; two in New Hampshire; and one in Massachusetts. These facilities combined process nearly 700,000 tons of construction and demolition (C&D) material each year and recover approximately 70 percent of that material. Much of that material is used as a high-quality fuel to generate renewable energy. ReEnergy has built a vertically integrated renewable energy company to maximize efficiencies and regional synergies. We believe that waste is not something to be discarded into ever-diminishing landfill space, but rather an opportunity to maximize materials that can be recycled and beneficially reused so we may minimize materials that are landfilled. In addition to manufacturing fuel for biomass facilities, our processed material also is used by other industries as asphalt paving, new cardboard and drywall, and recycled plastic and metal products.

ReEnergy has an experienced, highly capable recycling operations executive team, and we make use of state-of-the-art technology and best management practices to recover additional wood and other recyclables from the processing streams, leading to reduced landfill volumes and increased wood fuel production.

I am proud to work at ReEnergy, which has distinguished itself as a positive corporate citizen in the six states in which it operates. At ReEnergy, we are absolutely committed to the health and safety of our employees and neighbors; to protect the environment; and to be an exemplary citizen in our communities.

In August 2013, ReEnergy acquired the C&D processing facility in Lewiston, Maine formerly known as KTI Bio-Fuels. ReEnergy Lewiston supports Maine's solid waste policy through the recovery of significant volume of material that would otherwise be landfilled. In 2015 the Lewiston facility processed 181,000 tons of material

at a recycling rate of more than 75% which was an increase from 73% in 2014. Lewiston is on pace to replicate that recycling rate in 2016 and is in the process of evaluating programs to increase its recycling rate to include: mattress recycling; carpet recycling; and increased aggregate recovery. Since acquiring the facility from KTI in 2013, the amount of out-of-state waste has decreased by approximately 7% and we continue to aggressively pursue more in-state C&D.

It should be noted that our C&D recycling facilities sell a limited amount of CDD wood fuel into the Maine Market as recent plant closures and bankruptcies in the pulp and paper industry and the loss of Connecticut Class 1 renewable energy credits (RECs) have made the use of CDD wood fuel less attractive than green wood chips. Currently all of Lewiston's recovered CDD wood fuel is shipped north of the boarder for use as fuel and the manufacture of 'chip-board'.

Our Lewiston facility employs more than 40 local workers and supports many more indirect jobs through millions of dollars of in-state spending on good and services. In addition, ReEnergy makes lease and tax payments to the City of Lewiston and provides disposal of City generated C&D waste at zero cost – a combined benefit to the City of approximately \$275,000 annually.

Operations at Juniper Ridge Landfill

Our Lewiston facility is dependent on JRL for its economic viability as the 'fines' generated by the recycling process are beneficially used at JRL as alternate daily cover (ADC), and for the disposal of Over-Sized Bulky Waste (OBW) which consists primarily of non-recyclable materials.

It is ReEnergy's understanding that the Board may be considering a limit on the tonnage of OBW that can be disposed of at JRL, a concept that that was initially suggested in the 2012 Public Benefit Determination (PBD) for the previous expansion. ReEnergy strongly recommends that a limit on OBW disposal not be implemented, nor is one warranted. ReEnergy is committed to operating its Lewiston facility and implementing programs to recycle to the maximum extend practical. As previously stated our Lewiston facility is on target to recycle more than 75% in 2016. As the economy continues to improve and the volumes of C&D material generated continue to increase, the volume of OBW generated at our facility will increase even while maintaining the same high recycling rates. Placing an arbitrary limit on the amount of OBW that can be disposed of at JRL will place a significant financial hardship on an already financially stressed business.

Expansion Application

We believe the expansion application meets Maine DEP licensing criteria and should be approved without the OBW limitation.

Thank you for the opportunity to provide testimony.

Dated: October 18, 2016



Richard Geisser