

Testimony in Support of LD 2187

“An Act to Update Certain Water Quality Standards and to Reclassify Certain Waters of the State”

February 25, 2026

Good afternoon, Senator Tepler, Representative Doudera, and members of the Environment and Natural Resources Committee. My name is Scott Reed, I live in the Town of Turner and I serve as Director of Environmental Compliance at ND Paper. I appreciate the opportunity to express our support for LD 2187.

ND Paper owns and operates the Rumford Paper Mill, a fixture of the River Valley since 1901. We employ more than 450 people and work with hundreds of Maine vendors – from loggers to contractors to transportation companies – who rely on a strong manufacturing sector. Together, we contribute significantly to the local economy and to Maine’s papermaking tradition, which could not exist without Maine’s rivers and waters.

Over the past two years, DEP has led a thorough, transparent, science-based review of water quality standards. This work included public proposals, comments, hearings, scientific analysis, revisions, and ultimately a unanimous vote from the Board of Environmental Protection.

I have spent my career focused on the environment in an industry that relies on healthy rivers. The stewardship of these waters and the viability of the Mill are both important to me. The recommendations that emerged represent a thoughtful balance of science, environmental stewardship, and practical implementation. DEP’s evaluation shows that while the Androscoggin meets Class C standards, it does not meet Class B under all conditions – particularly under the conditions that DEP is obligated to demonstrate compliance - high river temperatures, low river flows, and maximum discharge periods.

For the Androscoggin River watershed, an upgrade to Class B would impact all point and non-point dischargers: industrial, commercial, municipal, and agricultural – as well as dams.

A shift to Class B would significantly narrow our discharge limits – reducing allowable permit limitations by more than half according to DEP. From an operational standpoint, while we typically operate far below our permitted levels, tighter thresholds will create challenges during infrequent but difficult conditions, such as process or mechanical upsets.

We are a continuous manufacturing facility that operates a 34 million gallon per day biological wastewater treatment system. Permit reductions of this magnitude would

require major changes - new infrastructure and equipment, and substantial cost to sustain compliance - even though DEP's evaluation cannot guarantee that the river will consistently meet Class B thresholds.

DEP has also proposed to adopt a pH value of 6.5 as the minimum water quality criteria across all river classes. While we support the adoption of LD 2187, we believe that further evaluation by DEP is needed before adopting this standard, given that pH levels less than 6.5 may occur in background waters in Maine. Although this may be a regional issue, it would be prudent to understand the available data and how this will be addressed prior to adopting the standard.

For ND Paper, it is important that the recommendations developed by DEP and BEP, and adopted by the Legislature, are grounded in science and provide a stable, well-considered framework for stakeholders to plan responsibly while continuing to invest in environmental performance.

Thank you for your time. I would be happy to answer any questions.