

Senator Orrin Hatch
104 Hart Office Bldg.
U.S. Senate
Washington DC 20510

Re: Submission to the Congressional Task Force on Economic Growth in Puerto Rico

Dear Senator Hatch:

I am pleased that the Congressional Task Force on Economic Growth in Puerto Rico extended the deadline for submissions to October 14th, and would commend the Task Force membership with their intention to cast the widest possible net to consider issues to revive economic growth in Puerto Rico. I think it is critical to view Puerto Rico's economic fortunes on a holistic basis that will review all major aspects that impact the fortunes of doing business in Puerto Rico.

On behalf of EC Waste, LLC., one of the leading providers of non-hazardous waste management and disposal services in Puerto Rico, I would like to provide the following comments to the Task Force membership. Headquartered in Humacao, Puerto Rico, we protect the quality of life in many communities, providing waste solutions to residential clients and commercial and industrial customers in Puerto Rico. We own and operate two private sanitary landfill systems on the island, located in Humacao and Peñuelas, which fully comply with the Subtitle D Regulation of the Resource Conservation and Recovery Act (RCRA) under the Environmental Protection Agency (EPA), and the Regulation for Non-Hazardous Solid Wastes Management of the Puerto Rico Environmental Quality Board (PR EQB).

Importantly, our facility in Peñuelas is the leading provider of industrial waste management and disposal services, and is critically important to the industrial, construction, pharmaceutical, public utilities and manufacturing sectors in Puerto Rico. Our services also include collection, transfer, disposal, recycling, non-hazardous liquid solidification and resource recovery. EC Waste employs 300 direct employees in Puerto Rico, and supports hundreds of indirect jobs. EC Waste is vested with helping ensure that Puerto Rico can achieve future economic growth, and our company's economic growth is truly entwined with the fortunes of the Commonwealth of Puerto Rico.

EC Waste was pleased to see that the enactment of the "PROMESA" legislation included provisions included in Title V aimed to reduce permitting and other regulatory barriers to help rebuild and revitalize critical infrastructure projects related to the deterioration of physical infrastructure that endangers public health and safety. Importantly, Title V included solid waste management systems in the definition of critical infrastructure which would authorize the island's solid waste management system to qualify for emergency permitting and regulatory relief. We appreciate recognition of the need to include solid waste management in the definition of projects that could be eligible, and believe that this is necessary given the current state of disrepair of the system.

Only by ensuring the adequacy of Puerto Rico's critical infrastructure can the Commonwealth attract the type of long term sustained new business opportunity that will enable Puerto Rico to

grow. While sometimes overlooked, solid waste management is a critical component of the system necessary to promote economic growth. Without drastic overhaul and modernization of Puerto Rico's solid waste management planning and enforcement of landfill operations, Puerto Rico's program for solid waste management will continue to be an environmental drag that will disincentivize reputable businesses from seeking economic opportunity in the Commonwealth. Puerto Rico is, and will continue to be an attractive destination for tourism, but issues such as clean drinking water and access to pollution-free vacation destination areas, issues predicated on the provision of an adequate system of solid waste management, will dictate how competitive Puerto Rico can be in the competition for tourism dollars. Most importantly, the current situation represents a substantial threat to the health and welfare of the residents of Puerto Rico.

Currently, the system overseeing Puerto Rico's landfill management is broken, and over 75% of Puerto Rico's landfills do not comply with the minimum federal safety standards. Most of these facilities have never been compliant with federal standards and continue to be health and safety hazards, including among other hazards, a breeding ground for the Zika virus. Unlike these non-compliant legacy landfills, our facilities have generous surplus capacity that handle solid waste in an environmentally safe manner.

Title V of PROMESA could provide the impetus necessary for Puerto Rican environmental regulators, the U.S. Environmental Protection Agency (EPA), and the solid waste management industry. The creation of the position for a Revitalization Coordinator could be the opportunity to help bring together the necessary elements to modernize and upgrade solid waste management handling in Puerto Rico. With proper planning and coordination, I believe that efforts to modernize Puerto Rico's landfill management could address the environmental crisis at landfill sites, incentivize programs for recycling and encourage private investment in the landfill system, and create job growth in the sustainable handling of solid waste. Investment in planning and coordination of efforts to modernize solid waste management will also help provide longer term health benefit and reduce healthcare costs, as obsolete landfills that help spread contamination and disease, such as the Zika virus.

The Task Force has an opportunity to advance the need for the modernization of Puerto Rico's system of solid waste management. We believe that the report should emphasize the need for the Financial Oversight and Management Board, and the Revitalization Coordinator, to take all necessary action to modernize and fix the broken system of environmental management at Puerto Rico's landfills. Investment in this effort will have long term health and social welfare benefits to the residents of Puerto Rico, and help develop the quality of infrastructure necessary to attract economic development.

The resources necessary to upgrade the solid waste management health and safety protections for Puerto Ricans will be extremely small in comparison to some of the initiatives that might be considered by the Task Force. However, they are vital to the creation of a basic critical infrastructure necessary for future investment in the Commonwealth. EC Waste believes that the membership of the Congressional Task Force on Economic Growth in Puerto Rico can assist in helping to modernize Puerto Rico's solid waste management system simply by recommending that strong attention and federal effort should be taken to clean up solid waste management

operations in Puerto Rico. Together the waste management industry, future leadership in Puerto Rico, and the EPA can help set a course for a brighter, healthier, and safer future.

On behalf of EC Waste, we thank you for consideration of these comments as you move forward with the recommendations of the Task Force.

Sincerely,

Randy Jensen
President & CEO
EC Waste, LLC.