



Connecticut Department of  
**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

*OFFICE OF ADJUDICATIONS*

*IN THE MATTER OF* : *APP. No.: 201604262*  
*COVANTA PROJECTS OF*  
*WALLINGFORD, LLC* : *August 20, 2018*

**FINAL DECISION**

On August 15, 2018, Covanta Projects of Wallingford, LLC (Applicant) and staff of the Department of Energy and Environmental Protection jointly filed the attached Agreed Draft Decision for my review and consideration ([Appendix 1](#)). Regs., Conn. State Agencies § 22a-3a-6(1)(3)(A). I have reviewed this submission, the record, and the relevant law in this matter. I find that the Application filed by the Applicant, requesting a permit to construct and operate a transfer station at a site previously used as a resource recovery facility in Wallingford, satisfies the relevant statutory and regulatory criteria related to the construction and operation of a transfer station. Furthermore, I find that the parties' Agreed Draft Decision satisfactorily conveys the factual findings and legal conclusions necessary to support my decision. I adopt this Agreed Draft Decision as the final decision in this matter.<sup>1</sup>

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<sup>1</sup> In the Agreed Draft Decision, the parties indicate that if the Agreed Draft Decision is adopted, the parties . . . "waive all rights to file exceptions with the Commissioner pursuant to § 22a-3a-6(y) of the Rules of Practice . . ." The Commissioner has delegated final decision-making authority to the agency's Office of Adjudications and its hearing officers in limited circumstances. Included in this delegation is the authority to issue final decisions in "matters where the hearing officer has issued a proposed final decision and the parties, including staff of the Department, by written stipulation waive compliance with the right to file exceptions to such decision, pursuant to [General Statutes] § 4-179(d)." Delegation of Authority, July 12, 2011, § VIII, F. 4. c. vii. I therefore, pursuant to authority delegated to me by the Commissioner, issue this decision as the Final Decision of the Department in this matter.

The DEEP has prepared a draft permit authorizing certain regulated activities at the Applicant's site. (Attached as [Appendix A](#) to the Agreed Draft Decision.) The record and this draft permit reflect staff's consideration of all the relevant criteria set forth in the applicable statutes and regulations governing the proposed activity.

### **Conclusion**

If conducted as proposed and in accordance with the terms and conditions of the draft permit, the regulated activities will be consistent with all relevant statutes and regulations regarding transfer stations. The permit sought by the Applicant shall be issued, consistent with this final decision.



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Brendan Schain, Hearing Officer

CONNECTICUT DEPARTMENT OF ENERGY  
AND ENVIRONMENTAL PROTECTION

OFFICE OF ADJUDICATIONS

In the matter of

COVANTA PROJECTS OF  
WALLINGFORD, LLC

Application No. 201604262

Permit To Construct And Operate  
A Solid Waste Transfer Station

August 15, 2018

AGREED DRAFT DECISION

I. INTRODUCTION.

Pursuant to § 22a-3a-6(l)(3)(A)(ii) of the Rules of Practice of the Connecticut Department of Energy & Environmental Protection ("DEEP" or the "Department"), Covanta Projects of Wallingford, LLC (the "Applicant"), and the staff of the DEEP Waste Engineering and Enforcement Division of the Bureau of Materials Management ("DEEP Staff") (collectively, the "Parties") respectfully submit this Agreed Draft Decision in resolution of the above-captioned application matter. The Draft Permit (to be identified as Permit No. 14801299-PCO, attached hereto as Appendix A and identified in the record as DEEP-32), to construct and operate a Solid Waste Transfer Station (the "Facility") at 530 South Cherry Street, Wallingford Connecticut (the "Site") in accordance with § 22a-208a of the General Statutes and §§ 22a-209-4 and 22a-209-9 of the Regulations of Connecticut State Agencies ("RCSA"), submitted by the DEEP Staff is acceptable to the Parties.

The Parties waive all objections to the adoption of the Agreed Draft Decision without substantive change or modification as the Hearing Officer's Proposed Final Decision and, if so adopted, waive all rights to file exceptions with the Commissioner pursuant to § 22a-3a-6(y) of the Rules of Practice, including the 15-day period normally allowed to file exceptions. The

Parties respectfully urge the Hearing Officer to issue the Proposed Final Decision as expeditiously as possible.

## II. FINDINGS OF FACT.

Taking into consideration and giving due regard to all the evidence in the record, the Parties make the following findings of fact:

### A. Project Background.

1. The Applicant is the owner of property located at 530 South Cherry Street, Wallingford, Connecticut.

2. The Facility is currently permitted to receive, consolidate, store and transfer therefrom municipal solid waste and recyclable items. It has been permitted as a Resources Recovery Facility ("RRF"), a waste to energy facility for the receipt and processing of municipal solid waste ("MSW") since 1986.

3. During a meeting on May 8, 2014, Applicant representatives described to DEEP Staff the concept for the transition of the Covanta Projects of Wallingford, LLC facility located at 530 South Cherry Street in the Town of Wallingford, from a waste to energy facility to a transfer station for the receipt, consolidation, storage, and transfer of MSW and recyclable items – also known as single-stream recyclables. In that meeting, the path forward for the Wallingford facility converting into a Transfer Station was discussed and established. The plan for the conversion of the facility consisted of a two-step process that had Covanta, as the first step, submitting an application to modify the then existing waste to energy or RRF permit to allow its transition to transfer station operations for solid waste, while maintaining the RRF authority, then as the second step, submitting an application for a new individual solid waste facility permit for a Transfer Station pursuant to General Statutes §§ 22a-6g and 22a-208a as well as RSCA §§ 22a-209-1 *et seq.* and 22a-3a-5.

4. On March 18, 2015, as step one outlined above, the DEEP issued a Permit to Operate No. 14801074-MPO under which the Applicant currently operates essentially

approving the transition of the RRF to a Transfer Station. The Applicant currently operates at the Site under Permit to Operate No. 14801074-MPO.

B. The Application.

1. On March 23, 2016, as step two outlined above, the Applicant filed a permit application (No. 201604262) (the "Application") with the DEEP for a permit to construct and operate a Solid Waste Transfer Station at the Site.

2. The Application was submitted on the prescribed forms and consists of Exhibits DEEP-1 and 1A through 1H. Applicant published a Notice of Permit Application in the *Record-Journal*, Meriden, Connecticut on March 21, 2016 in accordance with § 22a-6g. DEEP-1A.

3. DEEP Staff conducted a sufficiency review in accordance with General Statutes § 22a-208a(b), RCSA §§ 22a-3a-5(a) and 22a-209-4, as well as Department policy and practice and issued a Notice of Sufficiency on April 11, 2016. Exhibit DEEP-2.

4. Upon the issuance of the Notice of Sufficiency, Department staff began its technical review of the Application in accordance with General Statutes § 22a-208a(a), RCSA § 22a-209-4 and Department policy and practice. During the course of such technical review, the Department issued more than one Request for Additional Information ("RFAI").

5. DEEP Staff provided the Applicant with an RFAI on June 21, 2016. Exhibit DEEP-3. Applicant provided DEEP Staff with an initial response to the RFAI and the Parties met and exchanged a series of correspondence (Exhibits DEEP-5, 6, and 7) culminating in the Applicant's written response to the RFAI on September 30, 2016 consisting of modified application materials contained in DEEP-8 and 8A through 8H.

6. DEEP Staff provided Applicant with a second RFAI dated February 6, 2017. DEEP-9. On February 27, 2017, Covanta conveyed its response to the second RFAI which was contained in a letter addressed to the DEEP dated February 23, 2017 (DEEP-10 and 11). From March 9, 2017 through September 29, 2017, the DEEP Staff and Applicant

exchanged several emails to address clarifications regarding the site plans and proposed operations DEEP-12, 13, 14, 15, and 16.

7. On April 24, 2017, DEEP Staff completed its compliance history review and noted that the compliance history check did not result in the discovery of any open waste violations and stated that no further compliance review action was necessary for the subject application. DEEP-29.

8. On September 29, 2017, DEEP Staff and Applicant participated in a conference call pertaining to the Application as a transfer station vis-à-vis the receipt of construction and demolition waste. *See* DEEP-16. As a result of the September 29, 2017 conference call, Applicant submitted a letter dated October 2, 2017, with attached revised O&M Plan pages reflecting changes based on the substance of the conference call. DEEP-17.

9. On December 7, 2017, DEEP Staff and Applicant participated in another conference call to discuss the protocol for the change in waste types in different storage areas. *See* DEEP-18 and 21. As a result of the December 7, 2017 conference call, Applicant submitted updated pages of the O&M Plan on January 17, 2018 addressing the comments and questions posed by DEEP Staff and upon request provided further clarifications to DEEP Staff. DEEP-22, 23, and 24.

10. Upon completion of the Department's technical review of the Application, DEEP Staff drafted the permit to Construct and Operate a Solid Waste Transfer Station and the Notice of Tentative Determination to approve the Application for public notice. The permit and notice were drafted in accordance with Department policy, practice, General Statutes § 22a-6h and RCSA §§ 22a-209-4 and 22a-209-9. DEEP-25 and 26.

11. On March 1, 2018, DEEP published the Notice of Tentative Determination ("Notice") in accordance with § 22a-6h of the General Statutes.

12. Subsequently, on March 28, 2018, the DEEP received a petition (the "Petition") from Mr. Robert Gross ("Petitioner") signed by 25 or more persons requesting a public hearing on the Application in accordance with § 22a-208a(e) of the General Statutes.

13. DEEP Staff received formal comments on the draft permit and subject application from both the Town of Wallingford and Applicant (DEEP-27 and 28) and further comment by the Town indicating that all of its prior comments had been satisfactorily addressed by the Applicant. APP-2.

14. As a result of the Petition, a status conference was held on April 19, 2018, during which the Parties and Petitioner agreed to prehearing procedures and dates for prehearing conferences, a site walk, and administrative hearing. *See*, Status Conference Summary Scheduling Directive and Notice of Public Hearing dated April 26, 2018.

15. On June 21, 2018, notice of the public site visit and of the administrative hearing was published in the Record-Journal announcing the site visit for June 26, 2018, a public hearing for July 19, 2018, in the Wallingford Town Hall located at 45 South Main Street in Wallingford, Connecticut, and the evidentiary hearing to be held on July 25, 2018 and holding July 26, 2018 available if needed, at DEEP headquarters located at 79 Elm Street, Hartford, Connecticut.

16. The Hearing Officer conducted a public site visit on June 26, 2018 at 2:00 pm.

17. On July 18, 2018, the DEEP Staff submitted the pre-filed testimonies of Justin Williams and Gabrielle Frigon pursuant to the email of June 25, 2018 allowing for the submission of pre-filed testimony by July 18, 2018. DEEP 29 and 30.

18. The pre-filed testimony of Ms. Frigon concluded as follows: "In my professional opinion the application submission and content, and permit as drafted, comply with state statute and regulation, and the processing of the application was consistent with the Department's processing of other similar applications, its policies and practices." DEEP-30.

19. On July 19, 2018, the Hearing Officer conducted a public hearing at Wallingford Town Hall starting at 6 pm. The Applicant and DEEP Staff provided brief overviews of the facility operations and the review of the Application at the public hearing.

Representatives from the Town of Wallingford attended in support of the Application. No members of the public testified and the public hearing was closed.

20. On July 25, 2018, the Applicant provided a revised O&M Plan in response to DEEP Staff comments received in a meeting on June 25, 2018, and at the status conference. DEEP-31.

21. On July 25, 2018, DEEP Staff provided a revised draft permit based on the Applicant's revised O&M Plan and, as appropriate, reflective of the resolution of the Town of Wallingford's formal comments. DEEP-32

22. The Hearing Officer conducted an evidentiary hearing on July 25, 2018 at 9:30 am in the Russell Room at DEEP Headquarters, during which the Parties agreed to the filing of the revised O&M plan and revised draft Permit as DEEP-31 and 32 (respectively) and further agreed to submit an Agreed Draft Decision to the Hearing Officer consistent with DEEP-31 and 32 and in accordance with RCSA § 22a-3a-6(1)(3)(A)(ii), the DEEP Rules of Practice.

### III. CONCLUSIONS OF LAW

The Applicant's facility is regulated in accordance with the Connecticut Solid Waste Management Act (the "Act"). General Statutes §§ 22a-207 through 22a-256ee. Pursuant to the Act, the Commissioner of Energy and Environmental Protection ("Commissioner"), must provide for, among other things, the proper design, operation and monitoring of solid waste facilities "in a manner which ensures against pollution of the waters of the state, prevents the harboring of vectors, prevents fire and explosion and minimizes the emission of objectionable odors, dust or other air pollutants so that the health, safety, and welfare of the people of the state shall be safeguarded and enhanced and the natural resources and environment of the state may be conserved, improved and protected." § 22a-208(a).

The Act authorizes the Commissioner to issue, renew and modify permits for the construction, alteration and operation of solid waste facilities. RCSA §§ 22a-209-4 and 22a-209-9 implement the provisions of the Act that address Solid Waste Transfer Stations. Specifically,



RCSA § 22a-209-4 governs the application and permitting processes and RCSA § 22a-209-9 governs the permit and operating requirements of solid waste transfer facilities.

The Application filed by the Applicant (No. 201604262), for a permit to construct and operate a solid waste transfer station at the Site, is technically complete and complies with the requirements of state statutes and regulations (General Statutes §§ 22a-6, 22a-208a, and RCSA § 22a-209). DEEP-29 and 30.

The Commissioner properly conducted a public hearing pursuant to a petition filed under § 22a-208a(e).

The Applicant has demonstrated by a preponderance of the evidence that it satisfied all of the applicable criteria under state statutes and regulations (General Statutes §§ 22a-6 and 22a-208a, and RCSA § 22a-209) for a permit to construct and operate a Solid Waste Transfer Station in accordance with the terms of the Draft Permit.

The Department has demonstrated through the evidence entered into the record on this matter that the processing of the Application and the drafting of the permit to Construct and Operate a Solid Waste Transfer Station were conducted in accordance with RCSA §§ 22a-209-4 and 22a-209-9, as well as with Department policy and practice. The Department has also demonstrated through the evidence on the record that the draft permit (DEEP-32) safeguards public health, safety and welfare and is protective of the natural resources and environment of the State of Connecticut.

#### IV. CONCLUSION

The Applicant satisfies the relevant statutory and regulatory criteria for a permit to construct and operate a Solid Waste Transfer Station. The recommended Draft Permit (DEEP-32), meets all the statutory requirements and the Applicant agrees to the Draft Permit's conditions. Accordingly, issuance of the permit to construct and operate a Solid Waste Transfer Station as Permit No. 14801299-PCO is recommended, in its current form and wording (attached hereto as Appendix A), except as may be needed to correct typographical errors if any exist.

The Parties have demonstrated by a preponderance of the evidence presented that the Application and the Draft Permit comply with all applicable statutory and regulatory requirements. Accordingly, the Draft Permit attached hereto as Appendix A should be issued as a final permit.

AGREEMENT

Based on the foregoing, the undersigned hereby agree to the granting of a permit subject to the conditions stated in the Draft Permit, which are attached hereto.

COVANTA PROJECTS OF  
WALLINGFORD, LLC

CONNECTICUT DEPARTMENT OF  
ENERGY AND ENVIRONMENTAL  
PROTECTION

By /s/ Matthew Ranelli

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CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing Agreed Draft Decision was electronically mailed this 16th day of August, 2018, to:

HEARING OFFICER:

Mr. Brendan Schain  
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Hearing Officer  
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PETITIONER:

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Wallingford, CT 06492

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/s/ Matthew Ranelli  
\_\_\_\_\_  
Matthew Ranelli  
Commissioner of the Superior Court

**Appendix A**  
**Draft Permit (to be identified as Permit No. 14801299-PCO)**



## PERMIT TO CONSTRUCT AND OPERATE

PERMITTEE: Covanta Projects of Wallingford, LLC  
FACILITY ADDRESS: 530 South Cherry Street, Wallingford  
PERMIT No. 14801299-PCO

Pursuant to Section 22a-208a of the Connecticut General Statutes (“CGS”) and Section 22a-209-4 of the Regulations of Connecticut State Agencies (“RCSA”), a PERMIT TO CONSTRUCT AND OPERATE (“Permit”) IS HEREBY ISSUED by the Commissioner of Energy and Environmental Protection (“Commissioner”) to Covanta Projects of Wallingford, LLC (“Permittee”) to construct and operate a solid waste Transfer Station (“Facility”) located at 530 South Cherry Street, Wallingford, Connecticut. Subsequently, the Permit to Construct No. SW148-5-WP issued on January 2, 1986, the Minor Amendment to Permit to Construct No. SW148-5-WP issued on March 29, 1992, the Minor Amendment to Permit to Operate No. SW1480153 issued on September 30, 1992 and the Modified Permit to Operate No. 14801074-MPO issued on March 18, 2015 are no longer in effect and are replaced by this Permit.

### A. GENERAL TERMS AND CONDITIONS

1. a. This Permit is based on and incorporates by reference pertinent and appropriate sections of documents and specifications submitted as part of Application No. 201604262, to establish the Permit to Construct and Operate, including:
  - i. Application form received on March 30, 2016.
  - ii. Operation and Management Plan (O&MP) dated July 2018.
  - iii. A Site Plan, P.E. certified, dated September 30, 2016 and revised July 24, 2018 (“Site Plan”);
  - iv. A drawing entitled “Tipping Floor”, P.E. certified, dated September 30, 2016 and revised July 24, 2018;
  - v. Two (2) drawings entitled “ $\frac{1}{2}$ -mile Radius Map” prepared by Meehan & Goodin, dated September 30, 2016; and
  - vi. A drawing entitled “Property/Boundary and Topographic Survey” prepared by Meehan & Goodin, dated September 30, 2016.
- b. The Permittee shall maintain at the Facility and have available for reference by Facility staff and inspection by the Commissioner:
  - i. All documents or copies of such documents submitted as Application No. 201604262 and any document submitted in support of said application for the life of this Permit; and
  - ii. A copy of this Permit and the Facility’s Facility Plan which consists of the Operation and Management Plan and the engineered drawings which describe the Facility and its operations; and
- c. The Permittee shall for the life of this Permit, provide to the Department notification within thirty (30) Days of any changes in the information provided as part or in support of the application on which this Permit was based. Any inaccuracies found in the information submitted by the Permittee may result in revocation, reissuance, or modification of this Permit and civil or criminal enforcement actions.

2. As used in this Permit, the following definitions apply:

“Certified Operator” means the solid waste facility operator or an employee of such operator who is present at the facility and oversees or carries out the daily operations authorized through this Permit, and whose qualifications are currently certified in accordance with Section 22a-209-6 of the RCSA.

“Commissioner” means the Commissioner of Energy and Environmental Protection.

“Construction and Demolition Waste” or “C&D Waste” means waste from construction and demolition activities as defined in Section 22a-208x of the CGS.

“CFR” means the Code of Federal Regulations in effect the date this Permit is issued.

“Day” means calendar day.

“Department” means the Department of Energy and Environmental Protection.

“Designated Recyclable Item” means an item designated for recycling by the Commissioner in regulations adopted pursuant to subsection (a) of Section 22a-241b or designated for recycling pursuant to Section 22a-256 or 22a-208v of the CGS.

“Mixed Paper” means recyclable solid waste which is a combination of differing grades of source-separated recyclable paper including corrugated cardboard.

“Municipal Solid Waste” or “MSW” means municipal solid waste as defined in Section 22a-207 of the CGS.

“Oversized Municipal Solid Waste” or “OMSW” means large solid waste items from residential, commercial and industrial sources, which may include but is not limited to such items as furniture, carpets, mattresses, and rugs.

“Processing” or “Process(ed)” means the practice by which either the physical characteristics or the volume of solid waste accepted at the Facility is being altered through separating, sorting, baling, shredding, crushing, grinding, chipping, compacting, consolidation, transfer or reworking as part of recycling and/or volume reduction operations.

“Professional Engineer” or “P.E.” means an engineer licensed to practice in the state of Connecticut.

“Recyclable Items” are materials which are designated for recycling pursuant to Section 22a-241b of the CGS or Sections 22a-241b-1 to 22a-241b-4 of the RCSA or which may be recovered from the solid waste stream and for which there is a demonstrated market for reuse or that may be beneficially used in the production of other products.

3. The Permittee shall comply with all terms and conditions of this Permit. This Permit consists of the conditions contained herein and the specifications contained in the application documents, except where such specifications are superseded by the more stringent conditions contained herein. Violation of any provision of this Permit may be subject to enforcement action pursuant, but not limited, to Sections 22a-6, 22a-208, 22a-225 and 22a-226 of the CGS.

4. The Permittee shall make no changes to the specifications and requirements of this Permit, except in accordance with law.
5. To the extent that any term or condition of this Permit is deemed to be inconsistent or in conflict, with any term or condition of any Permit previously issued for this Facility, including any modifications thereto, or with any data or information contained in the application, or any other documents incorporated by reference in this Permit, the term or condition of this Permit shall control and remain enforceable against the Permittee.
6. The Permittee shall submit for the Commissioner's review and written approval all necessary documentation supporting any proposed physical and/or operational upgrades, improvements and/or minor changes in the Facility design, practices or equipment. The Commissioner may issue a written approval only if, in the Commissioner's judgment, the proposed physical and/or operational upgrades, improvements and/or minor changes: (a) are deemed necessary for a better and more efficient operation of the Facility; (b) do not significantly change the nature of the Facility, or its impact on the environment; and (c) do not warrant the issuance of a permit or authorization pursuant to Section 22a-208 et seq. of the CGS.

#### **B. AUTHORIZATION TO CONSTRUCT AND MAINTAIN**

1. Permit to Construct No. SW148-5-WP issued on January 2, 1986 authorized the construction of a Resources Recovery Facility ("RRF") for the receipt and Processing of MSW. Permit No. SW148-5-WP authorized the construction of an enclosed facility including a receiving area with a tipping floor, storage pit, crane, a furnace, boilers and supporting ancillary equipment, turbine, and a residue transfer building.
2. A minor amendment to the Permit to Construct No. SW148-5-WP was issued on March 29, 1992, to authorize the extension of the tipping floor in the receiving area.
3. A minor amendment to the Permit to Operate No. SW1480153 was issued on September 30, 1992, to authorize the construction of a 40,000-gallon tank to hold ash-laden water.
4. Permit to Operate No. 14801074-MPO issued on March 18, 2015 authorized the transition of the facility from operating as an RRF to operating as a transfer station.
5. The existing Facility consists of: a tipping floor with eight (8) bays and a storage pit for the storage and transfer of the materials listed below, and the boilers and supporting ancillary equipment (disconnected and rendered inoperable). The following equipment is authorized for use at the Facility: a front-end loader; a forklift truck; a crane; and an excavator. The Facility layout provides for the following:
  - a. An enclosed tipping floor, with areas for the storage of MSW and/or C&D waste or a compactor hopper and/or container system, and a storage pit for extra storage of MSW and/or C&D waste.
  - b. An area for the storage of Recyclable Items (Mixed Paper, food and beverage and/or plastic containers, and scrap metal) on the tipping floor.



6. The Permittee is authorized to maintain the Facility as described in Condition No. B.5. of this Permit.
7. The Permittee shall control dust, odors, water discharges and noise resulting from the construction and maintenance of the Facility at all times to assure compliance with applicable requirements of the RCSA, and any other applicable laws, including OSHA.
8. The Permittee shall, within thirty (30) Days from the completion of any maintenance undertaken pursuant to Condition No. B.6. of this Permit, submit a written notification for the Commissioner's review and written approval. Such notification shall include at a minimum:
  - a. P.E. certified statement that the construction of the Facility improvements has been completed as approved;
  - b. P.E. certified as-built drawings; and
  - c. A request for written authorization from the Commissioner to operate in accordance with Condition No. C.3. of this Permit.

**C. AUTHORIZATION TO OPERATE**

1. The Permittee is authorized to operate any or all of the components specified in Condition No. B.5. of this Permit, with the exception of the disconnected and inoperable boilers and their ancillary equipment referenced therein.
2. The Permittee shall not exceed the Processing and storage limits established by this Permit. Solid waste, other than those listed herein, shall not be accepted, Processed, treated, stored, transported or disposed on-site, or otherwise managed at the Facility without prior written approval of the Commissioner.
3. The Permittee is authorized to operate the Facility in accordance with all applicable law, including this Permit. Unless otherwise approved in writing by the Commissioner or limited by local authorities, the Permittee is authorized to operate as follows:

Receiving Hours:	Monday – Friday	6:00 a.m. – 4:00 p.m.
	Saturday	6:00 a.m. – 3:00 p.m.
Processing Hours:	Monday – Saturday	twenty-four (24) hours
Transfer Hours:	Monday – Saturday	5:00 a.m. – 10:00 p.m.
4. The Permittee is authorized to receive for Processing at the Facility no more than a total of 420 tons per Day (TPD) averaged from Sunday to Saturday, with a maximum of 620 TPD on any one day, of the following types of solid waste: (a) MSW; (b) scrap metal; (c) C&D Waste which may include OMSW; (d) Mixed Paper; and (e) food/beverage and/or plastic containers.
5. The Permittee shall store and manage solid waste at the Facility only in the designated areas as identified in the drawings referenced in Condition No. A.1.a. of this Permit and in accordance with the table below. Fully loaded containers of solid waste shall be transferred from the Facility within two (2) business days.

**Storage Table**

Storage Area	Waste Type	Maximum Capacity [cubic yards (cy) unless otherwise noted]	Comments
Bays 1, 2 & 3	putrescible MSW	5,090	piles
Bays 4 & 5	putrescible MSW or C&D Waste & OMSW	250	125-cy trailers
Bays 6 & 7	putrescible MSW or C&D Waste & OMSW	3,146	piles or 2, 125-cy trailers; only one waste type at a time; no waste stored in Bay 7 when Bay 8 is in use
Bay 8	Recyclable Items	1,078	piles
Storage Pit	putrescible MSW or C&D Waste & OMSW	3,704	piles
Tipping Floor	C&D Waste & OMSW; Recyclable Items	150	Up to three (3) fifty (50)-cy containers
<b>TOTAL</b>		<b>12,340</b>	

- a. **Storage and Management of putrescible MSW** shall be confined exclusively to the tipping floor, storage pit, and trailer loadout and storage area. Total Facility storage shall not exceed 12,340 cy. MSW storage shall be limited to no more than forty-eight (48) hours, from when such MSW entered the Facility, with the exception of legal holiday weekends. The storage trailer(s) shall be kept covered at all times except when the trailer(s) are being filled. Storage of MSW in the storage pit shall only take place if capacity is needed.
- b. **Storage of scrap metal** (including appliances which have had chlorofluorocarbon ("CFC") liquid removed and propane tanks without valves) shall not exceed a total of 1,228 cy. The scrap metal shall be placed in containers at the end of each operational day. Any scrap metal that contains used oil shall be managed in accordance with the applicable used oil regulations as specified in Section 22a-449(c)-119 of the RCSA, until the used oil is drained or otherwise removed from the scrap metal. At a minimum, such removed used oil shall be managed in accordance with the above regulation.
- c. **Storage of C&D Waste and OMSW:** Receipt of C&D Waste shall be conducted only on the tipping floor within the Facility building, on a first in/first out basis. The Facility building shall be equipped with adequate ventilation, fire protection systems and an impervious floor. Total Facility storage shall not exceed 7,250 cy. The trailer(s) used for storage and transfer of C&D Waste and OMSW shall be watertight and covered at all times except when material is being actively placed in or removed from the trailer(s) and shall not be stored on-site for greater than thirty (30) Days from when the waste first entered the Facility. Storage of C&D Waste in the storage pit shall only take place if capacity is needed.

No Processing of C&D Waste shall be conducted at the Facility with the exception of receipt, consolidation and transfer from the Facility. Such waste shall be transferred to a facility:

- i. Authorized to receive and Process such waste through the recovery of both Designated (which should only be present at incidental volumes) and non-Designated Recyclable Items therefrom;
- ii. Required to achieve a recovery rate that increases over time to achieve a 40% recovery rate, at a minimum; and

- iii. Whose recovery rate is measured as a percentage by volume of non-Designated Recyclable Items recovered from C&D Waste received.
  - d. **Storage of Recyclable Items including Mattresses:** Processing of Recyclable Items shall be conducted only on the tipping floor within the Facility building, and Processed on a first in/first out basis. Total Facility storage shall not exceed 1,228 cy. Storage shall be confined to the tipping floor or in trailers. The storage trailers shall be kept covered at all times except when material is being actively placed in or removed from the trailers.
  - e. **Miscellaneous household items for potential reuse** shall be maintained in a manner that does not interfere with the Permittee's ability to comply with the terms and condition of this Permit.
6. The Permittee shall:
- a. Store solid waste on-site in conformance with proper fire control measures. Routine maintenance and inspections of all fire control equipment shall be conducted in accordance with manufacturer's specifications;
  - b. Ensure that all solid waste accepted at the Facility is properly managed on-site, Processed, stored and transported to markets or other solid waste Processing or disposal facilities authorized to accept such solid waste;
  - c. Ensure that any unauthorized solid waste inadvertently received, or solid waste which is unsuitable for Processing at the Facility is: (i) immediately sorted, separated, isolated and temporarily stored in a safe manner prior to off-site transport; (ii) recorded and reported in the quarterly report required by Condition No. C.10. of this Permit; and (iii) disposed at a facility authorized to accept such solid waste. No more than ten (10) cubic yards of unacceptable solid waste shall be stored on-site unless authorized in writing by the Commissioner. A spare container may be made available for any storage emergency at the Facility;
  - d. Ensure that contingent storage of incidental mixed batteries, mercury-containing lamps, and mercury-containing equipment classified as universal wastes that is inadvertently delivered to the Facility as part of a load is conducted in accordance with the requirements of the Universal Waste Management Regulations (Sections 22a-449(c)-113 and 22a-209-17 of the RCSA). The storage container(s) shall be located in an area of the Facility that will not interfere with other permitted activities;
  - e. Provide expeditious notification regarding any emergency incident (explosion, accident, fire, release, or other significant disruptive occurrence) which: (i) significantly damaged equipment or structures; (ii) interrupts the operation of the Facility for greater than twenty-four (24) hours; (iii) results in an unscheduled Facility shutdown or forced diversion of solid waste to other solid waste facilities; (iv) could reasonably create a source of pollution to the waters of the state; or (v) otherwise threatens public health.

Such notification shall be: (i) immediately conveyed to the Commissioner using the 24-hour emergency response number (860) 424-3338 or the alternate number (860) 424-3333 and in no event later than twenty-four (24) hours after the emergency incident; (ii) verified to the Solid Waste Program in the Waste Engineering and Enforcement Division of the Bureau of Materials Management and Compliance Assurance by phone at (860) 424-3366, or at another current publicly published number for the Solid Waste Program, or by facsimile at (860) 424-4059; (iii) followed by a written report no later than the fifth

- business Day after the emergency incident detailing the cause and effect of the incident, remedial steps taken and emergency backup used or proposed to be implemented; and (iv) recorded in a log of emergency incidents. In addition to the notification requirements above, the Permittee shall comply with all other applicable reporting or notification requirements regarding the emergency incident including but not limited to, reporting required by Section 22a-450 of the CGS;
- f. Prevent the spillage of solid waste from transfer containers during on-site management, storage and off-site transfer. Each loaded container shall be covered before transfer off-site and the haulers shall be instructed to keep the containers covered during off-site transportation;
  - g. Operate the Facility in a safe manner and control fire, odor, noise, spills, vectors, litter and dust emission levels in continuous compliance with all applicable requirements, including OSHA. The Facility's premises shall be maintained in accordance with the following requirements:
    - i. Any litter and debris shall be removed from the Facility premises on days during which MSW is received; and
    - ii. Any leachate from truck loads and run-off from the Facility is contained and cleaned up on days during which MSW is received;
  - h. Ensure that the manufacturer's operation and maintenance manuals for each major piece of fixed or mobile Processing equipment, (which may include, but not be limited to, balers; conveyors; compactors; and storage tanks) installed or used at the Facility are available for review by the Commissioner;
  - j.
    - i. Determine through observation that incoming loads of solid waste, other than loads of source separated Recyclable Items, do not contain greater than ten percent (10%) by volume ("threshold contaminant percentages") of Designated Recyclable Items. For any loads identified that exceed the threshold criteria for load contamination specified in this condition the Permittee shall document each load in the daily log and report those to the Department in the quarterly reports required by this Permit. The Permittee shall also provide notice to the hauler in accordance with Condition No. C.6.1.v. of this Permit; and
    - ii. Determine through observation that incoming loads of source separated Recyclable Items do not contain greater than two percent (2%) by volume ("threshold contaminant percentages") of non-recyclable wastes. For any loads identified that exceed the threshold criteria for load contamination specified in this condition the Permittee shall document each load in the daily log and report those to the Department in the quarterly reports required by this Permit. The Permittee shall also provide notice to the hauler in accordance with Condition No. C.6.1.v. of this Permit.
  - k. Manage solid wastes in such a manner that all Recyclable Items are segregated so that no other solid waste may cause contamination or degradation of the recyclable product, or result in any negative impact on the recyclability of such material;
  - l. Conduct periodic unannounced inspections of truck loads delivered to the Facility, pursuant to Section 22a-220c(b) of the CGS. The inspections shall be performed for a minimum of five percent (5%) of the monthly truck loads received that are representative of the waste types authorized for receipt at the Facility. Records of such inspections shall be maintained at the Facility for the life of the Permit or such other timeframe specified

- in writing by the Commissioner. The inspections and supporting documentation shall consist of at a minimum:
- i. Photographs of each load other than loads of source separated Recyclable Items, inspected that exceeds the threshold contaminant percentages as specified in Condition No. C.6.j. of this Permit and each load of source separated Recyclable Items that exceeds five percent (5%) by volume of non-recyclable wastes;
  - ii. Origin of each load (municipality; regional facility and whether commercial or residential);
  - iii. Waste transporter company name;
  - iv. Estimated percentage of contaminant(s) present in each load and identification of each type; and
  - v. Immediate written notifications to the hauler, municipality in which the solid waste was generated and/or regional facility for each load that exceeds the threshold contaminant percentages specified in Condition No. C.6.j. of this Permit.
7. The Permittee shall have an operator, certified pursuant to Section 22a-209-6 of the RCSA, present at all times during Facility operation. All individuals under the supervision of such Certified Operator shall have sufficient training to identify solid waste received at the Facility which is not permitted to be received, or is unsuitable for Processing, and shall take proper action in managing such solid waste.
8. The Permittee shall prominently post and maintain a sign at the Facility entrance pursuant to Section 22a-209-9(c) of the RCSA that includes the Facility's name and the Department Permit number (Permit to Construct and Operate No. 1480xxxx-PCO) issuance date and expiration date. Such sign shall also include a phone number that provides the general public the ability to register questions or complaints twenty-four (24) hours per day. The Permittee shall maintain a log of all calls received and how such calls were addressed or resolved. In the event that the Permittee is not a Covered Electronics Recycler or partnered with one, the Permittee shall also post a sign in accordance with Section 22a-636 of the CGS.
9. The Permittee shall: (a) control all traffic related to the operation of the Facility in such a way as to make best efforts to prevent queuing of vehicles off-site and mitigate such queuing as necessary, as well as mitigate any excessive or unsafe traffic impact in the area where the Facility is located; (b) unless otherwise exempted, ensure that vehicles are not left idling for more than three (3) consecutive minutes pursuant to Section 22a-174-18(b)(3) of the RCSA; (c) prominently post and maintain signs limiting such vehicle idling time within the Facility.
10. The Permittee shall maintain daily records as required by Section 22a-209-9(p) of the RCSA and Sections 22a-208e and 22a-220 of the CGS. Based on such records, the Permittee shall prepare monthly summaries including, but not limited to, the following information as it pertains to solid waste:
- a. Type and quantity of solid waste received, including all Recyclable Items, unauthorized solid waste and/or universal waste;
  - b. Origin of waste load (municipality name; regional facility name) and waste hauler name;
  - c. Destination to which solid wastes, including all Recyclable Items, unauthorized solid waste and/or universal waste from the Facility were delivered for disposal or recycling, including quantities delivered to each destination; and
  - d. All daily logs (including documentation related to the unannounced inspections of truck loads) shall be maintained for the life of this Permit or such other timeframe specified in writing by the Commissioner.

The monthly summaries required pursuant this condition shall be submitted quarterly no later than January 31, April 30, July 31, October 31, of each year on up-to-date forms prescribed by the Commissioner directly to the Solid Waste Program, Waste Engineering and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127.

11. Nothing herein authorizes any person, municipality or authority to hinder municipal or regional solid waste recycling efforts. All activities conducted by the Permittee at the Facility shall be in accordance with this Permit, consistent with the state-wide Solid Waste Management Plan, also known as Connecticut's 2016 *Comprehensive Materials Management Strategy*, and with Sections 22a-228 and 229 of the CGS.

The Permittee shall:

- a. Conduct ongoing outreach in an effort to promote pay-as-you-throw ("PAYT" or unit based pricing) for waste disposal programs;
- b. Establish a process (that shall include a frequency) by which the Permittee or his Certified Operator will determine if sufficient capacity exists at any waste to energy facility(ies) (aka Resources Recovery Facility(ies), or RRFs) the Permittee identifies as suitably located, whether such facility is located in-state or out-of-state;
- c. Record in the daily log and maintain as part of the operating records for the Facility each time the Permittee or his Certified Operator selects a Landfill as the destination facility for the disposal of solid waste, the criteria that were used for the selection; and
- d. Document the selected destination facility and the volume of solid waste transferred to the destination facility, per shipment.

The Permittee shall also for the life of this Permit maintain such records and shall, upon request, make the records available for review by the Commissioner.

12. The Permittee shall, no later than sixty (60) Days after the issuance date of the written authorization to operate, pursuant to Condition No. B.8.c. of this Permit, establish for the Commissioner's benefit an acceptable financial assurance instrument and post the financial assurance with the Department in the amount of \$ 327,443, as required by Section 22a-6(a)(7) of the CGS in conjunction with the general requirements of Section 22a-209-4(i) of the RCSA.

13. The Permittee acknowledges and shall ensure that it complies with the following:
- a. The purpose of the financial assurance is to cover the third party costs for handling, removing, transporting and disposing the maximum permitted amount of unprocessed and Processed solid waste at the Facility, and any additional cost(s) to ensure the proper closure of storage areas including, but not limited to, equipment rental, site clean-up, the decontamination and disposal of all equipment and Processing and storage areas, and a fifteen percent (15%) contingency to cover unforeseen events or activities that may increase the overall cost to close the Facility.
  - b. The financial assurance instrument used by the Permittee to comply with Condition No. C.13. of this Permit shall comply with the requirements of Section 22a-209-4(i) of the RCSA, and 40 CFR 264.141 to 264.143 inclusive and 40 CFR 264.151, as referenced therein. The Permittee shall ensure that the financial assurance instrument is established in a format specified by the Commissioner for closure or post-closure maintenance and care, as appropriate.
  - c. The Department accepts five (5) types of financial assurance instruments, they are: (a) Trust Fund; (b) Irrevocable Standby Letter of Credit; (c) Financial Guarantee "Payment"

Bond; (d) Performance Bond; and (e) Certificate of Insurance. The following documents are also required to be submitted:

- i. A cover letter signed by the Permittee shall be submitted along with the Irrevocable Standby Letter of Credit, in accordance with Section 40 CFR 264.143(d)(4).
- ii. A "Standby Trust Agreement" shall be submitted along with either an Irrevocable Standby Letter of Credit; Financial Guarantee "Payment" Bond; or Performance Bond; and
- iii. A "Certification of Acknowledgement" shall be submitted along with the Trust Fund instrument.

d. The financial assurance shall:

- i. Be valid for and appropriately maintained during the term of this Permit;
- ii. Specify the Permittee's name, the Facility's address, the number and issuance date of this Permit; and
- iii. Be established in one or more of, the instrument formats found on the Department's website [[www.ct.gov/DEEP/financialassurance](http://www.ct.gov/DEEP/financialassurance)].

e. The financial assurance instrument shall be adjusted annually for inflation within the sixty (60) Days prior to the anniversary date of the financial assurance instrument, and whenever there is a change in operations that affects the cost of closing the Facility in accordance with the requirements of 40 CFR 264.142(b) as incorporated in the Section 22a-449(c)-104 of the RCSA.

14. The Permittee shall, no later than sixty (60) Days from the issuance date of this Permit perform quarterly compliance audits for the life of this Permit.

a. The compliance audits required by this condition shall consist of a thorough and complete assessment of the Permittee's compliance with Sections 22a-209-1 through 22a-209-17 of the RCSA and with the terms and conditions of this Permit.

b. Compliance Auditor

The compliance audits required by this condition shall be performed by an engineer licensed to practice in Connecticut ("P.E.") or consultant. Such P.E. or consultant shall be approved in writing by the Commissioner and will be required to prepare and submit to the Commissioner quarterly compliance audit reports.

The Permittee shall, prior to the Commissioner's approval of the P.E. or consultant ("compliance auditor"): (a) submit for the Commissioner's evaluation a detailed description of the P.E. or consultant's credentials (education; experience; training) which are relevant to the work required under this condition; and (b) certify to the Commissioner that such P.E. or consultant:

- i. Is not a subsidiary of or affiliated corporation to the Permittee or Permitted Facility;
- ii. Does not own stock in the Permittee or any parent, subsidiary, or affiliated corporation;
- iii. Has no other direct financial stake in the outcome of the compliance audit(s) outlined in this Permit; and
- iv. Has expertise and competence in environmental auditing and the regulatory programs being addressed through this Permit, including evaluation of compliance with requirements specified in Sections 22a-209-1 through 22a-209-17 of the RCSA and with the terms and conditions of this Permit;

Within ten (10) Days after retaining any P.E. or consultant other than the one approved by the Commissioner ("compliance auditor") pursuant to this condition, the Permittee shall submit to the Commissioner for his review and written approval, the information and documentation specified in this condition regarding such other P.E. or consultant. Nothing in this condition shall preclude the Commissioner from finding a previously acceptable P.E. or consultant unacceptable.

c. Scope of Compliance Audits

Compliance audits shall:

- i. Detail the Permittee's compliance with the requirements of this Permit and all applicable provisions of Sections 22a-209-1 through 22a-209-17 of the RCSA.
- ii. Describe any outreach efforts conducted by the Permittee to initiate pay-as-you-throw ("PAYT") programs also known as unit based pricing or variable-rate pricing and shall include names of waste haulers and municipalities that are participating in such programs.
- iii. Describe the Compliance Auditor's participation in and the results of compliance audits conducted at the Facility on the loads of solid waste received at the Facility during the compliance audit. The purpose of such inspections is to determine whether such loads are being received that contain greater than ten percent (10%) by volume Designated Recyclable Items; whether loads of source separated Recyclable Items contain greater than two percent (2%) by volume of non-recyclable wastes; and to detect patterns associated with such loads. Unless otherwise approved by the Commissioner, the compliance auditor shall inspect solid wastes unloaded from a minimum of ten (10) trucks received during the Day of the compliance audit. The Compliance Auditor shall document the actual number of truck loads inspected and the findings of such inspections.

d. Compliance Audit Report

The results of each compliance audit shall be summarized in a Compliance Audit report. At a minimum such report shall include:

- i. The names of those individuals who conducted the compliance audit;
- ii. The areas of the Facility inspected;
- iii. The records reviewed to determine compliance;
- iv. An evaluation and detailed description of the Permittee's compliance with this Permit and applicable regulations;
- v. A detailed summary of the Permittee's actions pursuant to Condition No. C.11.b. of this Permit, that provides the dates on which the Permittee reached out to RRFs to determine capacity at those facilities, the identity of all facilities that were contacted and their capacity status;
- vi. A detailed summary, pursuant to Condition No. C.11.c. of this Permit, regarding each time the Permittee transferred solid waste from the Facility to landfill(s), in lieu of RRFs, and the rationale, waste type and volume for each such transfer;
- vii. The identification of all violations of this Permit and applicable regulations;
- viii. A detailed description of the actions taken by the Permittee to correct patterns of loads received that exceed the threshold contaminant percentages specified in Condition No. C.6.j. of this Permit for loads that are representative of the waste types authorized for receipt at the Facility;
- ix. The findings of the compliance auditor regarding the inspections conducted in accordance with Condition No. C.14. of this Permit during the day of the compliance audit;
- x. A detailed description of all actions taken by the Permittee to correct the violation(s) identified in each compliance audit; and



- xi. The Permittee's certification of compliance with the regulations and documentation demonstrating such compliance pursuant to this Permit. In cases where multiple counts of the same violation are discovered, the report shall include a listing of each count.
  - e. **Permittee's Responses to Compliance Audit**  
The Permittee shall comply with the following:
    - i. The inspection frequency shall be quarterly for the remaining life of the Permit;
    - ii. All violations shall immediately be brought to the attention of the Permittee by the compliance auditor. The Permittee shall notify the Department within five (5) Days of the compliance audit of all violations noted during the compliance audit;
    - iii. The Permittee shall correct all violations immediately. Should the Permittee be unable to immediately correct the violation, within seven (7) Days of the date the Permittee became aware of the violation(s), the Permittee shall submit for the review and written approval of the Commissioner, a detailed plan to correct all violations noted. Such plan shall also include a schedule for implementation of the corrective actions required or recommended; and
    - iv. The Permittee shall ensure that no later than fifteen (15) Days after a compliance audit, a compliance audit report that meets the requirements of Condition No. C.14. of this Permit, is submitted to the Commissioner. A copy of the compliance audit report, shall be maintained at the Facility for the life of the Permit or for such other timeframe specified by the Commissioner.
  - f. In addition to any other sanction authorized by law, the Permittee shall cease accepting solid waste at the Facility in the event that the Permittee fails to submit in a timely manner the plan and schedule required by Condition No. C.14.e.iii. of this Permit or fails to correct the violations noted by the compliance audit(s) in accordance with the approved plan and schedule. The Commissioner may seek similar sanction for any violation of this Permit.
  - g. **Documentation Submittal Deadlines**  
The documents required to be submitted pursuant to this condition shall be submitted quarterly no later than January 31, April 30, July 31, October 31, directly to the Solid Waste Enforcement Program, in accordance with Condition No. C.15. of this Permit.
15. Unless otherwise specified in writing by the Commissioner, any documents required to be submitted under this Permit shall be directed to:
- Solid Waste Program
  - Waste Engineering and Enforcement Division
  - Bureau of Materials Management and Compliance Assurance
  - Department of Energy and Environmental Protection
  - 79 Elm Street, Hartford, CT 06106-5127
  - Or via email to [DEEP.Solid&HazWasteReports@ct.gov](mailto:DEEP.Solid&HazWasteReports@ct.gov).
16. Any document, including, but not limited to any notice, which is required to be submitted to the Commissioner under this Permit shall be signed by a duly authorized representative of the Permittee, as defined in Section 22a-430-3(b)(2) of the RCSA, and by the individual or individuals responsible for actually preparing such documents, each of whom shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and certify

that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement in the submitted information may be punishable as a criminal offense.”

Any false statement in any document submitted pursuant to this Permit may be punishable as a criminal offense in accordance with Section 22a-6 of the CGS, pursuant to Section 53a-157 of the CGS, and in accordance with any other applicable statute.

17. The date of submission to the Commissioner of any document required by this Permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this Permit, including but not limited to, notice of approval or disapproval of any document or other action shall be the date such notice is personally delivered or the date three (3) Days after it is mailed by the Commissioner, whichever is earlier. Any document or action which is due or required on a weekend or a legal state or federal holiday shall be submitted or performed by the next business day thereafter.
18. This Permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material nor any exclusive privileges, and is further subject to, any and all public and private rights and to any federal, state or local laws or regulations pertinent to the Facility or activity affected thereby.
19. Nothing in this Permit shall affect the Commissioner’s authority to institute any proceeding or to take any actions to prevent violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law.
20. Nothing in this Permit shall relieve the Permittee of other obligations under applicable federal, state and local laws.
21. Permit to Construct No. SW148-5-WP issued on January 2, 1986, Minor Amendment to Permit to Construct No. SW148-5-WP issued on March 29, 1992, Minor Amendment to Permit to Operate No. SW1480153 issued on September 30, 1992 and Modified Permit to Operate No. 14801074-MPO issued on March 18, 2015 are no longer in effect and are replaced by this Permit.

This Permit shall expire five (5) years from the date of issuance and may be revoked, suspended, modified, renewed, or transferred in accordance with applicable laws.

Issued on this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

By \_\_\_\_\_  
Robert E. Kaliszewski  
Deputy Commissioner

Application No. 201604262  
Permit to Construct and Operate No. 14801299-PCO  
Permittee – e-Certified  
City/Town Clerk – e-Certified

*S E R V I C E   L I S T*

In the matter of Covanta Projects of Wallingford, LLC – Application No.: 201604262

PARTY

REPRESENTED BY

The Applicant

Covanta Projects of Wallingford, LLC  
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Department of Energy and Environmental Protection

Waste Engineering and Enforcement Division  
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