



Covanta Southeastern Connecticut Company
132 Military Highway (Route 12)
Preston, CT 06365
Tel: 860-889-4900
Fax: 860-889-5300

February 20, 2023

Central Permit Processing Unit
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

RE: Permit to Operate Renewal Application for Covanta Southeastern Connecticut Company

To Whom It May Concern:

On behalf of the Covanta Southeastern Connecticut Company (Covanta), I am pleased to submit the enclosed Permit to Operate Application Renewal for the Southeastern Connecticut Regional Resource Recovery Facility (SCRRLF). This application includes the Permit Application Transmittal Form (DEP-APP-001), the Facility's Permit Application for Construction and Operation of a Solid Waste Facility and associated attachments.

If there are any questions or comments, please do not hesitate to contact me at (860) 889-4900 ext 135 or jachey@covanta.com.

Sincerely,

A handwritten signature in black ink that reads "Jacob Achey". The signature is written in a cursive style.

Jacob Achey
Environmental Specialist

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COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT A: EXECUTIVE SUMMARY & TABLE CONTENTS

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023

Attachment A: Executive Summary (REQUIRED)

Applicant Name: **Covanta Southeastern Connecticut Company**

Site or Facility Name: **Southeastern Connecticut Regional Resource Recovery Facility**

Provide an executive summary of the application contents. Include in the summary a description of the facility and a (TOC)

Section 1: Facility Description

Provide a brief description of the primary function of the facility, and processes and operations contained within. The description and function information represents the facility's standard operating scenario, (SOS). For renewals, provide a list of changes in circumstances or information on which the previous permit was based.

The Southeastern Connecticut Regional Resource Recovery Facility (Facility) is a nominal 690-ton per day refuse fired electric generating facility located at 132 RT-12 Preston, Connecticut (see Attachment B - Quadrangle Map). The Facility was designed and built to serve the solid waste disposal needs of Connecticut. Covanta, headquartered in Morristown, New Jersey operates the Facility through its affiliate, the Covanta Southeastern Connecticut Company (Covanta SECONN). Covanta SECONN serves a number of municipalities in the Southeastern portion of Connecticut including; East Lyme, Griswold, Groton, Ledyard, Montville, New London, North Stonington, Norwich, Preston, Sprague, Stonington, and Waterford. Covanta also serves other communities within Connecticut and out-of-state.

The Facility is located at 132 Connecticut Route 12 (Previously Military Highway) in Preston, Connecticut on approximately 8 acres of land. Covanta owns and operates the Facility under a contractual agreement with SCRRA. The Facility operates 24 hours a day, 365 days a year. Solid waste is accepted into the Facility Monday through Friday and Saturday or as defined in the Facility's Solid Waste Permit.

The primary purpose of the Facility is to safely and in an environmentally sound manner convert solid waste into electrical energy. The Facility accomplishes this task through two (2), EU-1 and EU-2, 345-ton per day Deutsche Babcock Anlagen Boiler utilizing a roller grate stoker system and one 18-megawatt Alstom steam powered turbine. one (1) diesel generator is available for emergency back up. Electrical power is distributed to Eversource's transmission system.

Facility management consists of a Plant Manager, Operations Manager, Maintenance Manager, and Environmental Specialist. Operational personnel work 12 hour rotating shifts under the direction of four shift supervisors. The remainder of the Facility is staffed with various personnel including maintenance, accounting and administrative staff.

Section 2: Table of Contents

The TOC will list part of the contents: *Renewal Application for a Permit to Construct and Operate a Solid Waste Facility*; and all supporting documents including plans, drawings, reports, studies, appendices, or other documentation which are attached as part of the application.

Attachment A - Executive Summary & Table of Contents

- **Permit Application for Permit to Operate**
- **Transmittal Form**

Attachment AA – Public Notice Certification

Attachment B – Applicant Compliance Form

Attachment C – USGS Site Location Map

Attachment D - Coastal Consistency Review Form

Attachment E – NDDB Assessment

Attachment H – Background Info

Attachment I – Statement of Consistency

Attachment J – Business Information

Attachment K – Site Plans

Attachment N – Certification of Activities

- **Permit to Operate – Issued 2013**
- **Comments to Permit to Operate**

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

PERMIT APPLICATION FOR PERMIT TO OPERATE

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



Permit Application for Construction and Operation of a Solid Waste Facility

Use the "Instructions" document (DEP-SW-INST-100) to assist you in completing this form. Print or type unless otherwise noted. Your submittal to DEP must include: *Permit Application Transmittal Form* (DEP-APP-001); Completed Application Form (this form, DEP-SW-APP-100); all required supporting documents; and Fee.

Part I: Application and Permit Type

In the table below, check only one box in the left column to identify the type of solid waste facility for which you are applying for a permit. Complete one permit application for each solid waste facility requiring a permit.

	Solid Waste Facility Types (Check the type of permit you are applying for)	Initial Fee	DEP Use Only	
			Application No.	Permit No.
Solid Waste Disposal Area/Landfill				
<input type="checkbox"/>	Municipal Solid Waste	\$37,750.00		
<input type="checkbox"/>	Residue or other Solid Waste	\$26,500.00		
<input type="checkbox"/>	Closure Plan - Active Site	\$610.00		
<input type="checkbox"/>	Closure Plan - Inactive Site	\$4,000.00		
<input type="checkbox"/>	Closure Plan – Unpermitted Site	\$3,000.00		
Volume Reduction Plant				
<input type="checkbox"/>	Resources Recovery Facility	\$138,250.00		
<input type="checkbox"/>	Intermediate Processing Center	\$14,500.00		
<input type="checkbox"/>	Composting ≤100 Tons/day Source Separated Organic Material	\$7,750.00		
<input type="checkbox"/>	Composting >100 tons/day Source Separated Organic Material	\$10,000.00		
<input type="checkbox"/>	Construction and Demolition Waste ≤100 tons/day	\$7,750.00		
<input type="checkbox"/>	Construction and Demolition Waste >100 tons/day	\$14,500.00		
<input type="checkbox"/>	Land Clearing/Clean Wood Processing	\$10,000.00		
<input type="checkbox"/>	Sludge Processing	\$7,750.00		
<input type="checkbox"/>	Other (i.e., Shredder, Baler, Compactor, etc.) ≤100 tons/day (Please specify type)	\$10,000.00		
<input type="checkbox"/>	Other (i.e., Shredder, Baler, Compactor, etc.) >100 tons/day (Please specify type)	\$14,500.00		
<input checked="" type="checkbox"/>	Renewal - Resources Recovery Facility	\$1,400.00		
<input type="checkbox"/>	Renewal - Composting, Source Separated Organic Material	\$330.00		
<input type="checkbox"/>	Renewal - All Others	\$660.00		

Part I: Application and Permit Type (continued)

	Solid Waste Facility Types (Check the type of permit you are applying for)	Initial Fee	DEP Use Only	
			Application No.	Permit No.
Transfer Stations				
<input type="checkbox"/>	≤75 tons/day	\$7,750.00		
<input type="checkbox"/>	>75 and ≤150 tons/day	\$10,000.00		
<input type="checkbox"/>	>150 tons/day	\$11,500.00		
<input type="checkbox"/>	Renewal	\$660.00		
Biomedical Waste Treatment Facility				
<input type="checkbox"/>	New Application	\$19,000.00		
<input type="checkbox"/>	Renewal	\$660.00		
Minor Permit Amendments				
<input type="checkbox"/>	Solid Waste Disposal Area/Landfill	\$1,375.00		
<input type="checkbox"/>	All Others <i>(Please specify type of facility)</i>	\$940.00		
Permit Modifications				
<input type="checkbox"/>	<i>Regulatory Requirement Modification</i> A modification to an existing permit to authorize a change to satisfy new statute, regulation, permit or order. <i>(Please specify type of facility)</i>	25% of the standard application fee, maximum of \$11,500.00		
<input type="checkbox"/>	<i>Permittee Initiated Modification</i> A modification to an existing permit to authorize a change in the approved or existing design, capacity, process or operation of the facility. <i>(Please specify type of facility)</i>	50% of the standard application fee, maximum of \$30,250.00		
<input type="checkbox"/>	Landfill Closure Plan Modification	\$940.00		
Existing Permit Information				
If this application is for a renewal, minor amendment or modification of an existing permit or the facility was previously licensed by a general permit or an emergency or temporary authorization, provide:				
Permit or Authorization Number(s)			Expiration Date	
Solid Waste Facility Type				
11401089-PO			June 20, 2023	
			RRF	

Part II: Fee Information

The initial fee, as indicated on pages 1 and 2 of this application, is the total permit application fee due for a new permit or for a modification of an existing permit to construct, unless otherwise specified in the general statutes or in regulations adopted pursuant thereto. The initial fee for the permit type you are applying for is to be submitted with the application. The application will not be processed without the initial fee.

The fee for municipalities is 50% of the listed rates on pages 1 and 2 of this application (see section 22a-6(b) CGS).

Part III: Applicant Information

1. **Applicant:** Complete the information on the Applicant as indicated on the *Permit Application Transmittal Form* (DEP-APP-001):

Name: **Covanta Southeastern Connecticut Company**

Mailing Address: **132 Route 12**

City/Town: **Preston**

State: **CT**

Zip Code: **06365**

Business Phone: **860-889-4900**

ext. **131**

Fax:

Contact Person: **Kenneth Heubner**

Title: **Facility Manager**

Email address: **khuebner@covanta.com**

Property Interest: Check the appropriate boxes that represents the Applicant's interest in property at which the proposed activity is to be located:

site owner

option holder

lessee

easement holder

operator

other (specify)

Check here if there are co-applicants. If so, label and attach additional sheet(s) with the required information as requested above.

2. Primary contact for this application if not contact person named in (1) above (e.g., environmental consultant, engineer, etc.):

Firm Name:

Mailing Address: **132 Route 12**

City/Town: **Preston**

State: **CT**

Zip Code: **06365**

Business Phone: **860-889-4900**

ext. **135**

Fax:

Contact Person: **Jacob Achey**

Title: **Environmental Specialist**

Email address: **jachey@covanta.com**

3. List attorney or other representative, if applicable:

Firm Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

cell:

Fax:

Attorney Name:

Email address:

Part III: Applicant Information (continued)

4. Facility or Equipment Operator, if not the applicant::

Firm Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Name of Facility Foreman or Lead (on Site):

Title:

On-Site Phone:

Operator Type (check one):

Individual

Private company

Federal

State

Municipal

5. Owner of the property on which the Facility will be located:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Title:

Email address:

6. Connecticut Licensed Professional Engineer (P.E.):

The applicant must retain the services of a qualified P.E. to prepare and certify the necessary engineering drawings including the operation and management plan for the facility.

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Email address:

Connecticut PE Registration Number:

7. List any engineer(s) or other consultant(s) employed or retained to assist in preparing this submittal.

Firm Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Title:

Email address:

Service Provided:

Check here if additional sheets are necessary, and label and attach them to this sheet.

Part IV: Site Information

1. FACILITY NAME AND LOCATION

Name of Facility(if applicable): **Covanta Southeastern Connecticut Company**

Street Address or Location Description: **132 Route 12**

City/Town: **Preston**

State: **CT**

Zip Code: **06365**

Latitude and longitude of the exact location of the proposed activity in degrees, minutes, and seconds:

Latitude: **41.475589**

Longitude: **-72.068786**

Method of determination (check one): GPS USGS Map

Other (please specify):

If a USGS Map was used, provide the quadrangle name: **Uncasville Quadrangle**

2. **INDIAN LANDS:** Is or will the Facility be located on federally recognized Indian lands? Yes No

3. **COASTAL AREA:** Is the proposed activity located within the coastal boundary as delineated on DEP approved coastal boundary maps? Yes No

If yes, and this application is for a new facility or modification for an existing facility, you must submit a *Coastal Consistency Review Form* (DEP-APP-004) with your application as "Attachment D".

4. **ENDANGERED OR THREATENED SPECIES:** Is the project site located within an area identified as a habitat for endangered, threatened or special concern species as identified on the "State and Federal Listed Species and Natural Communities Map"? Yes No Date of Map: **12/2022**

If yes, complete and submit a *Connecticut Natural Diversity Data Base (CT NDDB) Review Request Form* (DEP-APP-007) to the address specified on the form. **Please note NDDB review generally takes 4 to 6 weeks and may require additional documentation from the applicant. DEP strongly recommends that applicants complete this process before submitting the subject application.**

When submitting this **application** form, include copies of any correspondence to and from the NDDB, including copies of the completed *CT NDDB Review Request Form*, as Attachment E.

For more information visit the DEP website at www.ct.gov/dep/angeredspecies (Review/Data Requests) or call the NDDB at 860-424-3011.

5. **AQUIFER PROTECTION AREAS:** Is the site located within a town required to establish Aquifer Protection Areas, as defined in section 22a-354a through 354bb of the General Statutes (CGS)?

Yes No

If yes, is the site within an area identified on a Level A or Level B map? Yes No

To view the applicable list of towns and maps visit the DEP website at www.ct.gov/dep/aquiferprotection

To speak with someone about the Aquifer Protection Areas, call 860-424-3020.

6. **CONSERVATION OR PRESERVATION RESTRICTION:** Is the property subject to a conservation or preservation restriction? Yes No

If Yes, proof of written notice of this application to the holder of such restriction or a letter from the holder of such restriction verifying that this application is in compliance with the terms of the restriction, must be submitted as Attachment F.

Part IV: Site Information (continued)

7. **ENVIRONMENTAL JUSTICE COMMUNITY:** Does the site include an applicable facility which is located within an Environmental Justice Community, as defined in the Environmental Justice Public Participation Guidelines (Guidelines) www.ct.gov/dep/environmentaljustice? Yes No

If yes and this application is for a new or expanded permit, you must prepare an Environmental Justice Public Participation Plan (DEP-EJ-PLAN-001) in accordance with the Guidelines and submit such plan to:

Environmental Justice Program
Office of the Commissioner
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

prior to submitting this application. Once you have received written approval for your Environmental Justice Public Participation Plan from the DEP, submit this completed application with a copy of the Plan approval as Attachment G.

8. **WETLAND AREA:** Is the site located in a wetland area? Yes No

9a. **WATER CLASSIFICATION:** Ground water classification of the site: **GA**

9b. **SURFACE WATER BODIES:** Identify surface water bodies which may be impacted: (Attach additional sheets if necessary)

Name: **Thames River**

Surface Water Classification: **A**

Name:

Surface Water Classification:

Name:

Surface Water Classification:

Name:

Surface Water Classification:

Part V: Facility Information

1. **DISPOSAL AREA (Landfill):** Complete this item if this application is for the construction and operation of a proposed new landfill, or the renewal or modification of an existing landfill permit.

LANDFILL TYPE (Check one): Municipal Solid Waste Residue or other Solid Waste

a. **New Landfill**

- (i) Proposed Site Capacity (**cubic yards (cy)**):
- (ii) Estimated Operating Life (**years**):
- (iii) Acreage of Property (**acres**):
- (iv) Proposed Acreage for Waste Disposal (**acres**):

b. **Existing Landfill (Permit Modification)**

- (i) Current Permitted Site Capacity (**cy**):
- (ii) Remaining Permitted Site Capacity (**cy**):
- (iii) Proposed Increase in Site Capacity (**cy**):
- (iv) Current Operating Life: (as noted in previous permit application) (**years**):
- (v) **Remaining Operating Life (years)**:
- (vi) Proposed Increase in Operating Life (**years**):
- (vii) Acreage of Property (**acres**):
- (viii) Current Permitted Acreage Remaining for Waste Disposal (**acres**):
- (ix) Proposed Increase in Acreage for Waste Disposal (**acres**):

2. **SOLID WASTE FACILITY:** Complete this item if this application is for the construction and operation of a proposed new facility, or the renewal or modification of an existing facility permit.

a. **FACILITY TYPE** (Check one):

Volume Reduction Plant (VRP) Transfer Station Biomedical Waste Facility

If you checked (VRP) indicate which type of VRP:

- Resource Recovery Facility Intermediate Processing Center
- Composting (source separated organic material) Construction and Demolition Waste
- Land Clearing/Clean Wood Processing Sludge Processing
- Other (specify):

Note: Proposed solid waste facility's that are designed to use complicated processing equipment systems or new technologies, may be required to conduct equipment shakedown and performance testing. After the issuance of the proposed facility's Permit to Construct and the completion and approval of the facility's construction, DEP will issue a Temporary Permit to Operate (TPO) in order to complete the necessary equipment and performance testing. DEP will develop the final Permit to Operate based upon the P.E. certified test report(s).

Part V: Facility Information (continued)

2b. Complete this item if this application is for the construction and operation of a proposed new facility, or the renewal or modification of an existing facility permit.			
	Proposed New Facility	Existing Facility	
		Current Permit	*Proposed Permit Modification
(i) Processing Capacity (tons per day)		689 TPD (344.5 PBU)	
(ii) Storage Capacity (cubic yards) (cy)		29,300 CY	
(iii) Acreage of Property (acres)		8.5 acres	
(iv) Acreage Used by Facility (acres)		8 acres	
(v) Operation (days/hours)		24/7	
(vi) Processing Equipment:: In the rows across and below, list the types, sizes, number and design parameters of principle fixed equipment and rolling stock used. (i.e., chippers, loaders, etc.)			
Two DBA Boilers		344.5 TPD (per boiler)	
Emergency Diesel Generator			
Turbin Generator		18 MW	
Ash Residue Building		1,100 CY	
Solid Waste Receiving Area (Pit & Tipping floor)		27,700 CY	
Various Storage and reloading areas		500 CY	
<input type="checkbox"/> Check here if additional sheets are necessary, and label and attach them to this sheet.			
(vii) * Proposed Permit Modification Type(s) (check all that apply):			
<input type="checkbox"/> Equipment <input type="checkbox"/> Facility Design <input type="checkbox"/> Operations			
<input checked="" type="checkbox"/> Other (please specify): Permit, Record Keeping & Reporting requirements			

Part V: Facility Information (continued)

Facility Type (check one): Landfill VRP Transfer Station Biomedical Waste Facility

3. SOLID WASTE STORAGE VOLUMES: List the maximum on-site storage and storage method for each type of unprocessed and processed material. Storage of most waste materials require use of covers, secondary containment, impervious surfaces, and other measures as needed to prevent pollution.

Type of Solid Waste	Maximum Volume of On-Site Storage	Storage Method <small>*waste must be stored under cover</small>
*Antifreeze Liquid (gallons) (gl)		
Appliances with CFC (Freon) (units)		
*Asbestos Containing Material (cy)		
*Batteries, Lead-Acid (vehicle) (units)		
*Biomedical Waste (cy)		
*Capacitors, Fluorescent Lght Ballasts (only from residential sources) (gl)		
*Cardboard (cy)		
*Casting Sand (cy)		
*Coal Fly Ash (cy)		
*Construction and Demolition Waste (cy)		
*Contaminated Dredge Spoils (cy)		
*Contaminated Soils (cy)		
*Covered Electronic Devices (kg) or (cy)		
*Food/Beverage Containers and Plastic Containers (cy)		
*Industrial (e.g., slag, sludge) (cy)		
*Metal, Scrap (cy)	400	Piles/containers Ash Load out building, Outdoors in covered containers
*Mixed Municipal Solid Waste (cy)	22,500	Refuse Bunker, piles & containers tipping Floor
*Oil Filters (cy)		
*Oil, Used (gl)		
Oversized MSW (furniture, mattresses, rugs and carpets) (cy)	150	Container on tipping Floor, Outdoors in covered Containers

Part V: Facility Information (continued)

Facility Type (check one): Landfill VRP Transfer Station Biomedical Waste Facility

Type of Solid Waste	Maximum Volume of On-Site Storage	Storage Method <small>*waste must be stored under cover</small>
*Paints and Stains (gl)		
*Paper (cy)		
Propane Tanks with Valves (units)		
*Residue (i.e., ash generated from the combustion process at a Resource recovery facility) (cy)	6,050	Ash Load out building, Tipping Floor (Emergency Use), Outdoor covered containers
*Scrap Tires (crumb rubber) (cy)		
*Scrap Tires (shreds) (cy)		
*Scrap Tires (whole) (cy)		
*Sludge Ash (cy)		
*Sludge (drinking water treatment plant; e.g., alum)		
*Sludge (wastewater treatment plant) (cy)		
Swap Shop: Household Items		
Textiles and Shoes		
Wood, Clean – processed (wood chips) (cy)	200	Piles on Tipping Floor
Wood, Clean – unprocessed (land clearing debris, brush, pallets) (cy)		
*Wood, Treated (painted, creosoted, etc.) (cy)		
Yard Waste (leaves and grass clippings) (cy)		
<input type="checkbox"/> Check here if additional sheets are necessary, and label and attach them to this sheet.		

Part V: Facility Information (continued)

Facility Type (check one): Landfill VRP Transfer Station Biomedical Waste Facility

Type of Solid Waste	Maximum Volume of On-Site Storage	Storage Method <i>*waste must be stored under cover</i>
<i>Universal Waste</i> <i>Note: the combined weight of all universal waste stored on-site shall not exceed 5000 kg</i>		
*Electronics, Used (kg)	50	Universal Waste Storage Room
*Mercury Containing Lamps (kg)	50	Universal Waste Storage Room
*Mercury Containing Thermometers, Thermostats (kg)	50	Universal Waste Storage Room
*Batteries, Mixed (kg)	100	Universal Waste Storage Room
<i>Other material(s)</i> (kg/lbs/cy/gl/units)		
<input type="checkbox"/> Check here if additional sheets are necessary, and label and attach them to this sheet.		

Part VI: Supporting Documents

Be sure to read the instructions (DEP-SW-INST-100) for information on completing the following attachments. Check the appropriate box for each attachment being submitted to verify that *all* applicable attachments have been submitted. When submitting any supporting documents:

- (1) **label each document** with its respective attachment letter (e.g., Attachment A, etc.);
- (2) **include the applicant's** name as entered on Part I of the *Permit Application Transmittal Form*.

<input checked="" type="checkbox"/>	Attachment A:	Executive Summary
<input checked="" type="checkbox"/>	Attachment B:	<i>Applicant Compliance Information</i> (DEP-APP-002)
<input checked="" type="checkbox"/>	Attachment C:	An 8-1/2" x 11" copy of the relevant portion or an original of a United States Geological Survey (USGS) Topographic Quadrangle Map (scale: 1:24,000) with the regulated activity or project site outlined or pinpointed, as appropriate. (Not required for applications to construct and operate a solid waste disposal area (landfill).)
<input checked="" type="checkbox"/>	Attachment D:	<i>Coastal Consistency Review Form</i> (DEP-APP-004)
<input checked="" type="checkbox"/>	Attachment E:	CT NDDDB Information
<input type="checkbox"/>	Attachment F:	Conservation or Preservation Restriction Information, if applicable.
<input type="checkbox"/>	Attachment G:	Copy of the Written Environmental Justice Public Participation Plan Approval Letter, if applicable. (Also, a final report documenting the implementation of the Environmental Justice Public Participation Plan is to be prepared and submitted before the Department issues a Notice of Tentative Determination.)
<input checked="" type="checkbox"/>	Attachment H:	<i>Background Information</i> (DEP-SW-APP-101)
<input checked="" type="checkbox"/>	Attachment I:	<i>Statement of Consistency with Solid Waste Management Plan</i> (DEP-SW-APP-102)
<input checked="" type="checkbox"/>	Attachment J:	<i>Business Information</i> (DEP-SW-APP-103)
<input checked="" type="checkbox"/>	Attachment K:	Facility Plan (i.e. transfer stations; volume reduction plants “resource recovery facility, composting, construction and demolition waste, land clearing/clean wood, sludge processing, intermediate processing center”; biomedical waste treatment facility) <input type="checkbox"/> Engineering drawings such as area map/site plan/architectural and mechanical drawings; cross sections and specifications; mass balance diagrams; etc. <input checked="" type="checkbox"/> Operation and Management Plan
<input type="checkbox"/>	Attachment L:	<i>Determination of Need Information</i> (DEP-SW-APP-104) (Required only for applications to construct and operate ash residue and mixed municipal solid waste landfills, construction or expansion of resources recovery facilities and mixed municipal solid waste composting facilities.)
<input type="checkbox"/>	Attachment M:	<i>Checklist for Solid Waste Disposal Areas (Landfills)</i> (DEP-SW/WD-APP-110)
<input checked="" type="checkbox"/>	Attachment N:	<i>Certification Regarding Activities Previously Licensed by DEP</i> (DEP-SW-APP-105)

Part VII: Applicant Certification

The applicant(s) *and* the individual(s) responsible for actually preparing the application must sign this part. An application will be considered insufficient unless *all* required signatures are provided.

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief.

I understand that a false statement in the submitted information may be punishable as a criminal offense, in accordance with Section 22a-6 of the General Statutes, pursuant to Section 53a-157b of the General Statutes, and in accordance with any other applicable statute."

I certify that this application is on complete and accurate forms as prescribed by the commissioner without alteration of the text.

I certify that I will comply with all notice requirements as listed in Section 22a-6g of the General Statutes."



Signature of Applicant

2/15/2023

Date

Kenneth Huebner

Name of Applicant (print or type)

Facility Manager

Title (if applicable)



Signature of Preparer (if different than above)

2/15/2023

Date

Jacob Achey

Name of Preparer (print or type)

Environmental Specialist

Title (if applicable)

- Check here if additional signatures are required. If so, please reproduce this sheet and attach signed copies to this sheet. You must include signatures of any person preparing any report or parts thereof required in this application (i.e., professional engineers, consultants, etc.).

Please submit::

- (1) Permit Application Transmittal Form;
- (2) completed Application Form;
- (3) all required Supporting Documents;
- (4) One copy of the entire package; and
- (5) Fee.

To: CENTRAL PERMIT PROCESSING UNIT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127

Please remember to publish notice of the permit application immediately after submitting your completed application to DEP. Within five business days of the date the application is filed with DEP, send a copy of the notice to the chief elected official of the municipality in which the regulated activity is proposed, and provide DEP with the "Certification of Notice Form (DEP-APP-005A)" and an affidavit of publication from the newspaper.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

PERMIT APPLICATION TRANSMITTAL FORM

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



Connecticut Department of Energy & Environmental Protection

CPPU USE ONLY

App #:
Doc #:
Check #:

Permit Application Transmittal Form

Please complete this transmittal form in accordance with the instructions in order to ensure the proper handling of your application(s) and the associated fee(s). Print legibly or type.

Part I: Applicant Information:

- If an applicant is a corporation, limited liability company, limited partnership, limited liability partnership, or a statutory trust, it must be registered with the Secretary of State. If applicable, applicant's name shall be stated exactly as it is registered with the Secretary of State.
If an applicant is an individual, provide the legal name (include suffix) in the following format: First Name; Middle Initial; Last Name; Suffix (Jr, Sr., II, III, etc.).

Applicant: Covanta Southeastern Connecticut Company
Mailing Address: 132 Route 12
City/Town: Preston State: CT Zip Code: 06365
Business Phone: 860-889-4900 ext.:
Contact Person: Jacob Achey Phone: 860-889-4900 ext. 135
E-Mail: jachey@covanta.com
Applicant (check one): [] individual [x] *business entity [] federal agency [] state agency [] municipality [] tribal
*If a business entity, list type (e.g., corporation, limited partnership, etc.): Corporation
[] Check if any co-applicants. If so, attach additional sheet(s) with the required information as supplied above.
Please provide the following information to be used for billing purposes only, if different:
Company/Individual Name: Covanta Southeastern Connecticut Company
Mailing Address: 132 Route 12
City/Town: Preston State: CT Zip Code: 06365
Contact Person: Kenneth Huebner Phone: 860-889-4900 ext. 131

Part II: Project Information

Brief Description of Project: (Example: Development of a 50 slip marina on Long Island Sound)
Permit to Operate Renewal Application
Location (City/Town): Preston
Other Project Related Permits (not included with this form):
Table with 6 columns: Permit Description, Issuing Authority, Submittal Date, Issuance Date, Denial Date, Permit #
Row 1: Permit to Operate, CTDEEP, 6/20/2013, 11401089-PO

Part III: Individual Permit Application and Fee Information

New, Mod. or Renew	Individual Permit Applications	Initial Fees	No. of Permits Applied For	Total Initial Fees	Original + Required Copies
	AIR EMISSIONS				
	New Source Review <input type="checkbox"/> Revision <input type="checkbox"/> minor mod	\$940.00			1 + 0
	Title V Operating Permits <input type="checkbox"/> Revision <input type="checkbox"/> minor mod <input type="checkbox"/> non-minor mod	none			1 + 0
	Title IV	none			1 + 0
	Clean Air Interstate Rule (CAIR)	none			1 + 0
	WATER DISCHARGES				
	To Groundwater	\$1300.00			1 + 1
	To Sanitary Sewer (POTW)	\$1300.00			1 + 1
	To Surface Water (NPDES)	\$1300.00			1 + 1
	WATER PLANNING AND MANAGEMENT				
	Dam Safety	none			1 + 2
	Domestic Sewage Treatment Works (For municipal and private sewage treatment facilities discharging to surface waters)	\$1300.00/ Mod = \$940			1 + 1
	Water Diversion (consumptive) and Registrations	★			1 + 5
	LAND AND WATER RESOURCES				
	Flood Management Certification	none			1 + 1
	Flood Management Certification Exemption	none			1 + 1
	Inland Wetlands and Watercourses (State Agencies Only)	none			1 + 5
	Inland 401 Water Quality Certification	none			1 + 5
	FERC- Hydropower Projects- 401 Water Quality Certification	none			
	Water Diversion (non-consumptive)	★			1 + 5
	Certificate of Permission	\$375.00			1 + 2
	Coastal 401 Water Quality Certification	none			1 + 2
	Structures and Dredging/and Fill/Tidal Wetlands	\$660.00			1 + 2
	WASTE MANAGEMENT				
	Aerial Pesticide Application	★			1 + 2
	Aquatic Pesticide Application	\$200.00			1 + 0
	CGS Section 22a-454 Waste Facilities	★			1 + 1
	Disruption of a Solid Waste Disposal Area	\$0			1 + 1
	Hazardous Waste Treatment, Storage and Disposal Facilities	★			1 + 1
	Marine Terminal License	\$100.00			1 + 0
	Stewardship	\$4000.00			1 + 1
Renew	Solid Waste Facilities	★	1	\$1400	1 + 1
	Waste Transportation	★			1 + 0
	Subtotal ➡		1	\$1400	
GENERAL PERMITS and AUTHORIZATIONS		Subtotals Page 3 & 4 ➡			
Enter subtotals from Part IV, pages 3 - 6 of this form		Subtotals Page 5 ➡			
		Subtotals Page 6 ➡			
TOTAL ➡			1	\$1400	
<input type="checkbox"/> Indicate whether municipal discount or state waiver applies. Less Applicable Discount ➡					
AMOUNT REMITTED ➡					
Check # ➡	<input type="text"/>	Check or money order should be made payable to: "Department of Energy and Environmental Protection"			

★ See fee schedule on individual application.

Part IV: General Permit Registrations and Requests for Other Authorizations Application and Fee Information

✓ General Permits and Other Authorizations	Initial Fees	No. of Permits Applied For	Total Initial Fees	Original + Required Copies
AIR EMISSIONS				
<input type="checkbox"/> Limit Potential to Emit from Major Stationary Sources of Air Pollution	\$2760.00			1 + 0
<input type="checkbox"/> Diagnostic and Therapeutic X-Ray Devices (Medical X-Ray) Registration	\$190.00/Xray device			1 + 0
<input type="checkbox"/> Radioactive Materials and Industrial Device Registration (Ionizing Radiation)	\$200.00			1 + 0
<input type="checkbox"/> Emergency/Temporary Authorization	★★			★★
<input type="checkbox"/> License Revocation Request	\$0			★★
<input type="checkbox"/> Other, (please specify):				
WATER DISCHARGES				
Categorical Industry User to a POTW				
<input type="checkbox"/> Discharges ≥ 10,000 gpd	\$6250.00			1 + 0
<input type="checkbox"/> Discharges < 10,000 gpd	\$3125.00			
Comprehensive Discharges to Surface Water and Groundwater				
<input type="checkbox"/> Registration Only	\$625.00			1 + 0
<input type="checkbox"/> Approval of Registration by DEEP	\$1250.00			
<input type="checkbox"/> Domestic Sewage	\$625.00			1 + 0
<input type="checkbox"/> Food Service Establishment Wastewater		No Registration		
Groundwater Remediation Wastewater				
<input type="checkbox"/> Registration Only	\$625.00			1 + 0
<input type="checkbox"/> Approval of Registration by DEEP	\$1250.00			
Miscellaneous Discharges of Sewer Compatible Wastewater				
<input type="checkbox"/> Registration Only	\$500.00			1 + 0
<input type="checkbox"/> Approval of Registration by DEEP	\$1000.00			
<input type="checkbox"/> Nitrogen Discharges		No Registration		
<input type="checkbox"/> Point Source Discharges from Application of Pesticides	\$200.00			1 + 0
<input type="checkbox"/> Stormwater Associated with Commercial Activities	\$300.00			1 + 0
Stormwater Associated with Industrial Activities				
<input type="checkbox"/> No Exposure Certification	\$250.00			1 + 0
<input type="checkbox"/> <50 employees—see general permit for additional requirements	\$500.00			
<input type="checkbox"/> >50 employees—see general permit for additional requirements	\$1000.00			
<input type="checkbox"/> Stormwater & Dewatering Wastewaters-Construction Activities	★			1 + 0
<input type="checkbox"/> Stormwater from Small Municipal Separate Storm Sewer Systems (MS4)	\$625.00			1 + 0
<input type="checkbox"/> Stormwater from DOT Separate Storm Sewer Systems (DOT MS4)	\$0			1 + 0
<input type="checkbox"/> Subsurface Sewage Disposal Systems Serving Existing Facilities	★★			1 + 0
<input type="checkbox"/> Swimming Pool Wastewater - Public Pools and Contractors	\$500.00			1 + 0
Vehicle Maintenance Wastewater				
<input type="checkbox"/> Registration Only	\$625.00			1 + 0
<input type="checkbox"/> Approval of Registration by DEEP	\$1250.00			
<input type="checkbox"/> Emergency/Temporary Authorization - Discharge to POTW	\$1500.00			1 + 0
<input type="checkbox"/> Emergency/Temporary Authorization - Discharge to Surface Water	\$1500.00			1 + 0
<input type="checkbox"/> Emergency/Temporary Authorization - Discharge to Groundwater	\$1500.00			1 + 0
<input type="checkbox"/> Other, (please specify):				
Note: Carry subtotals over to Part III, page 2 of this form.		Subtotal ➡		

★ See fee schedule on registration/application.

★★ Contact the specific permit program for this information.
(Contact numbers are provided in the instructions)

Part IV: General Permit Registrations and Requests for Other Authorizations (continued)

<input checked="" type="checkbox"/> General Permits and Other Authorizations	Initial Fees	No. of Permits Applied For	Total Initial Fee	Original + Required Copies
AQUIFER PROTECTION PROGRAM				
<input type="checkbox"/> Registration for Regulated Activities	\$625.00			1 + 0
<input type="checkbox"/> Permit Application to Add a Regulated Activity	\$1250.00			1 + 0
<input type="checkbox"/> Exemption Application from Registration	\$1250.00			1 + 0
WATER PLANNING AND MANAGEMENT				
<input type="checkbox"/> Dam Safety Repair and Alteration: Non Filing	No Registration			
<input type="checkbox"/> Dam Safety Repair and Alteration: Filing – No PE	\$100.00			1 + 0
<input type="checkbox"/> Dam Safety Repair and Alteration: Filing – PE	\$200.00			1 + 0
<input type="checkbox"/> Dam Safety Repair and Alteration: Approval of Filing	\$250.00			1 + 0
<input type="checkbox"/> Diversion of Remediation Groundwater	No Registration			
<input type="checkbox"/> Diversion of Water for Consumptive Use: Reauthorization Categories	\$2500.00			1 + 0
<input type="checkbox"/> Diversion of Water for Consumptive Use: Authorization Required	\$2500.00			1 + 4
<input type="checkbox"/> Diversion of Water for Consumptive Use: Filing Only	\$1500.00			1 + 1
<input type="checkbox"/> Water Resource Construction Activities	★			1 + 0
<input type="checkbox"/> Emergency/Temporary Authorization	★★			★★
<input type="checkbox"/> Notice of High Hazard Dam or a Significant Hazard Dam	\$0			1 + 0
<input type="checkbox"/> Other, (please specify):				
LAND AND WATER RESOURCES				
Minor Coastal Structures				
<input type="checkbox"/> 4/40 Docks/Access Stairs	\$700.00			1 + 1
<input type="checkbox"/> Beach Grading	No Registration			
<input type="checkbox"/> Buoys or Markers	No Registration			
<input type="checkbox"/> Experimental Activities/Scientific Monitoring Devices	No Registration			
<input type="checkbox"/> Harbor Moorings	No Registration			
<input type="checkbox"/> Non-harbor Moorings	\$250.00			1 + 1
<input type="checkbox"/> Osprey Platforms and Perch Poles	No Registration			
<input type="checkbox"/> Pump-out Facilities	No Registration			
<input type="checkbox"/> Swim Floats	No Registration			
Coastal Maintenance				
<input type="checkbox"/> Backflow Prevention Structure	No Registration			
<input type="checkbox"/> Beach Grading/Raking	No Registration			
<input type="checkbox"/> Catch Basin Cleaning	No Registration			
<input type="checkbox"/> Coastal Remedial Activities Required by Order	\$700.00			1 + 1
<input type="checkbox"/> Coastal Restoration	No Registration			
<input type="checkbox"/> DEEP Boat Launch Infrastructures	No Registration			
<input type="checkbox"/> DOT Infrastructures	No Registration			
<input type="checkbox"/> Marina and Mooring Field Reconfiguration	\$700.00			1 + 1
<input type="checkbox"/> Minor Seawall Repair	No Registration			
<input type="checkbox"/> Placement of Cultch	No Registration			
<input type="checkbox"/> Reconstruction of Legally Existing Structure/Obstruction/Encroachment	\$300.00			1 + 1
<input type="checkbox"/> Removal of Derelict Structures	No Registration			
<input type="checkbox"/> Residential Flood Hazard Mitigation	\$100.00			1 + 1
<input type="checkbox"/> Temporary Access of Construction Vehicles/Equipment	No Registration			
<input type="checkbox"/> Programmatic General Permit	★			1 + 1
<input type="checkbox"/> Emergency/Temporary Authorization				
<input type="checkbox"/> Other, (please specify):				
Note: Carry subtotals over to Part III, page 2 of this form.		Subtotal ➔		

★ See fee schedule on registration/application.

★★ Contact the specific permit program for this information.
(Contact numbers are provided in the instructions)

Part IV: General Permit Registrations and Requests for Other Authorizations (continued)

<input checked="" type="checkbox"/> General Permits and Other Authorizations	Initial Fees	No. of Permits Applied For	Total Initial Fee	Original + Required Copies
WASTE MANAGEMENT				
<input type="checkbox"/> Addition of Grass Clippings at Registered Leaf Composting Facilities	\$500.00			1 + 0
<input type="checkbox"/> Beneficial Use Determination	★			1 + 0
<input type="checkbox"/> Collection and Storage of Post Consumer Paint	\$0			1 + 0
<input type="checkbox"/> Connecticut Solid Waste Demonstration Project	\$1000.00			1 + 0
Construct and Operate a Commercial Facility for the Management of Recyclable Materials and Certain Solid Wastes (Commercial GP)	Initial/Mod Fee			
<input type="checkbox"/> Asbestos Containing Materials	\$1,250.00/\$ 625			1 + 0
<input type="checkbox"/> Ash Residue	\$1,250.00/\$ 625			1 + 0
<input type="checkbox"/> Clean Wood: Tier III	\$500.00/\$250			1 + 0
<input type="checkbox"/> Clean Wood: Tier II	\$250.00/\$125			1 + 0
<input type="checkbox"/> Construction and Demolition Waste: Tier III	\$1,250.00/\$625			1 + 0
<input type="checkbox"/> Construction and Demolition Waste: Tier II	\$500.00/\$250			1 + 0
<input type="checkbox"/> Non-RCRA Hazardous Waste/Compatible Solid Wastes	\$1,250.00/\$625			1 + 0
<input type="checkbox"/> Recyclables	\$500.00/\$250			1 + 0
<input type="checkbox"/> Universal Wastes/Compatible Solid Wastes	\$1,250.00/\$625			1 + 0
Contaminated Soil and/or Staging Management (Staging/Transfer)				
<input type="checkbox"/> New Registrations	\$250.00			1 + 0
<input type="checkbox"/> New Approval of Registrations	\$1500.00			1 + 0
<input type="checkbox"/> Renewal of Registrations	\$250.00			1 + 0
<input type="checkbox"/> Renewal of Approval of Registrations	\$750.00			1 + 0
<input type="checkbox"/> Disassembling Used Electronics	\$2000.00			1 + 0
<input type="checkbox"/> Leaf Composting Facility	\$0			1 + 1
<input type="checkbox"/> Municipal Transfer Station	\$800.00			1 + 1
<input type="checkbox"/> One Day Collection of Certain Wastes and Household Hazardous Waste	\$1000.00			1 + 0
<input type="checkbox"/> Sheet Leaf Composting Notification	\$0			★★
Special Waste Authorization				
<input type="checkbox"/> Landfill or RRF Disposal	\$660.00			
<input type="checkbox"/> Asbestos Disposal	\$300.00			1 + 0
<input type="checkbox"/> homeowner	\$0			
<input type="checkbox"/> Storage and Processing of Asphalt Roofing Shingle Waste	\$2500.00			1 + 0
<input type="checkbox"/> Storage and Processing of Scrap Tires for Beneficial Use	\$1250.00			1 + 0
<input type="checkbox"/> Emergency/Temporary Authorization	★★			★★
<input type="checkbox"/> Other, (please specify):				
REMEDIATION				
<input type="checkbox"/> In Situ Groundwater Remediation: Enhance Aerobic Biodegradation	★			1 + 2
<input type="checkbox"/> In Situ Groundwater Remediation: Chemical Oxidation	\$500.00			1 + 0
<input type="checkbox"/> Emergency/Temporary Authorization	★			★★
Note: Carry subtotals over to Part III, page 2 of this form.		Subtotal →		

★ See fee schedule on registration/application.

★★ Contact the specific permit program for this information.

(Contact numbers are provided in the instructions)

Affirmative Action, Equal Employment Opportunity and Americans with Disabilities

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act (ADA). Please contact us at (860) 418-5910 or deep.accommodations@ct.gov if you: have a disability and need a communication aid or service; have limited proficiency in English and may need information in another language; or if you wish to file an ADA or Title VI discrimination complaint.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT AA

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



Connecticut Department of Energy & Environmental Protection

Certification of Notice Form - Notice of Application

DEEP USE ONLY
Division
Application No.

I, Kenneth Huebner, c/o Covanta Southeastern Connecticut Company, certify that

the attached notice represents a true copy of the notice that appeared in The Norwich Bulletin

on February 17, 2023

I also certify that I have provided a copy of said notice to the chief elected municipal official listed below as required by section 22a-6g CGS.

Sandra L. Allyn Gauthier First Selectwoman

Name of Official Title of Official

389 Route 2

Address

Preston CT 06365

City/Town State Zip Code

Handwritten signature of Kenneth Huebner

2/17/23

Signature of Applicant Date

Kenneth Huebner Facility Manager

Name of Applicant (print or type) Title (if applicable)

Govt Public Notices

Property is Zoned BR.

B. ZBA 03-2023 Arthur Barber III and Daniel Barber, 149 Latham Drive, Griswold, CT, varying Section 10.4.1 of the Town of Griswold Zoning Regulations to reduce the side yard setback from 15 ft. required to 5 ft. provided to construct a 24 ft. x 24 ft. garage accessory building. Property is zoned R-60.

Public comments can be expressed at the meeting and written comments can be received via the USPS Mail on this application prior to the scheduled meeting date.

Theodore A. Faulis, Chairman

#8431089
Norwich Bulletin 2/17, 2/24/23

Notice To Creditors

NOTICE TO CREDITORS

ESTATE OF Victor W. Beausoleil, late of Plainfield (23-00044)

The Hon. Carolanne Rowe, Judge of the Court of Probate, District of Plainfield - Killingly Probate Court, by decree dated February 9, 2023, ordered that all claims must be presented to the fiduciary at the address below. Failure to promptly present any such claim may result in the loss of rights to recover on such claim.

Jennifer Coughlin, Clerk

The fiduciary is: Joseph Beausoleil, 787 Beach Pond Rd, Voluntown, CT 06384

#8464317
Norwich Bulletin 2/17/23

NOTICE TO CREDITORS

ESTATE OF Theresa G. Burke, late of Killingly (23-00049)

The Hon. Carolanne Rowe, Judge of the Court of Probate, District of Plainfield - Killingly Probate Court, by decree dated

Notice To Creditors

February 14, 2023, ordered that all claims must be presented to the fiduciary at the address below. Failure to promptly present any such claim may result in the loss of rights to recover on such claim.

Michelle R. Gunn, Chief Clerk

The fiduciary is: Gary Burke, 206 Modock Road, Putnam, CT 06260

#8461646
Norwich Bulletin 2/17/23

Public Notices

Notice of Permit Application

Town(s): Preston

Notice is hereby given that The Covanta Southeastern Connecticut Company (the applicant) as it relates to the Southeastern Connecticut Regional Resource Recovery Facility located at 132 Route 12 in Preston, Connecticut has submitted to the Department of Energy and Environmental Protection an application under section 22a208a of the Connecticut General Statutes for a permit to conduct a regulated activity in the construction, alteration, or operation of solid waste facilities.

Specifically, the applicant proposes to combust solid waste to produce electricity under contract with the Southeastern Connecticut Regional Resource Recovery Authority. The activity takes place at 132 RT 12 in Preston, Connecticut. The proposed activity will potentially affect the Thames River & adjacent wetland. The effects of such activity have been minimized through the use of state of the art air pollution control equipment; litter control plan, storm water reuse program, and odor and noise abatement technology.

Interested persons may obtain copies of the application from Jacob Achey, Envi-

Public Notices

ronmental Specialist, Covanta of Southeastern Connecticut Company, 132 RT 12, Preston, CT 06365, (860) 889-4900
lachej@covanta.com.

The application will be available for inspection at <https://www.covanta.com/where-we-are/our-facilities/secann> and at the Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, 79 Elm Street, 5th Floor, Hartford, CT 061067-5127, 860-424-3366, from 8:30 am to 4:30 pm, Monday through Friday.

#8453434
Norwich Bulletin 2/17/23

**Find
your
new
job
HERE!**



Notice of Permit Application

Town(s): **Preston**

Notice is hereby given that The Covanta Southeastern Connecticut Company (the applicant) as it relates to the Southeastern Connecticut Regional Resource Recovery Facility located at 132 Military Highway in Preston, Connecticut has submitted to the Department of Energy and Environmental Protection an application under section 22a208a of the Connecticut General Statutes for a permit to conduct a regulated activity in the construction, alteration, or operation of solid waste facilities.

Specifically, the applicant proposes to combust solid waste to produce electricity under contract with the Southeastern Connecticut Regional Resource Recovery Authority. The activity takes place at 132 Military Highway in Preston, Connecticut. The proposed activity will potentially affect the Thames River & adjacent wetland. The effects of such activity have been minimized through the use of state of the art air pollution control equipment, litter control plan, storm water reuse program, and odor and noise abatement technology.

Interested persons may obtain copies of the application from Jacob Achey, Environmental Specialist, Covanta of Southeastern Connecticut Company, 132 Military Highway, Preston, CT 06365, (860) 889-4900 jachey@covanta.com.

The application will be available for inspection at <https://www.covanta.com/where-we-are/our-facilities/seconn> and at the Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, 79 Elm Street, 5th Floor, Hartford, CT 061067-5127, 860-424- 3366, from 8:30 am to 4:30 pm, Monday through Friday.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT B

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



**Connecticut Department of
Energy & Environmental Protection**

Applicant Compliance Information

DEEP ONLY

App. No. _____

Co./Ind. No. _____

Applicant Name: Covanta Southeastern Connecticut Company

Mailing Address: **132 Route 12**

City/Town: **Preston**

State: **CT**

Zip Code: **06365**

Business Phone: **860-889-4900**

ext.:

Fax: **860-889-5300**

Contact Person: **Jacob Achey**

Phone: **860-889-4900** ext. **135**

*E-mail: **jachey@covanta.com**

If you answer yes to any of the questions below, you must complete the Table of Enforcement Actions on the reverse side of this sheet as directed in the instructions for your permit application.

- A. During the five years immediately preceding submission of this application, has the applicant been convicted in any jurisdiction of a criminal violation of any environmental law?

Yes No

- B. During the five years immediately preceding submission of this application, has a civil penalty been imposed upon the applicant in any state, including Connecticut, or federal judicial proceeding for any violation of an environmental law?

Yes No

- C. During the five years immediately preceding submission of this application, has a civil penalty exceeding five thousand dollars been imposed on the applicant in any state, including Connecticut, or federal administrative proceeding for any violation of an environmental law?

Yes No

- D. During the five years immediately preceding submission of this application, has any state, including Connecticut, or federal court issued any order or entered any judgement to the applicant concerning a violation of any environmental law?

Yes No

- E. During the five years immediately preceding submission of this application, has any state, including Connecticut, or federal administrative agency issued any order to the applicant concerning a violation of any environmental law?

Yes No

Table of Enforcement Actions

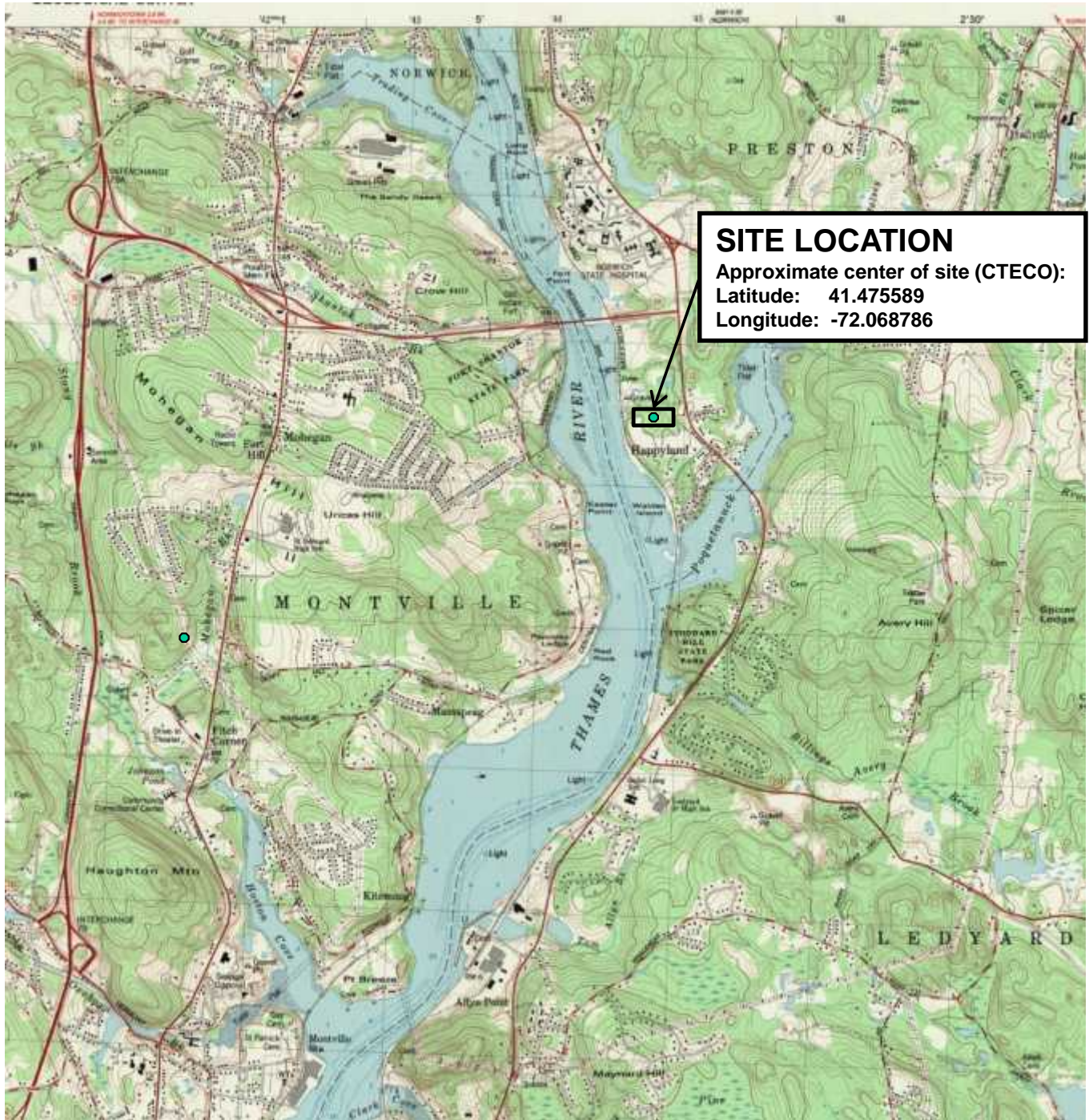
(1) Type of Action	(2a) Date Commenced	(2b) Date Terminated	(3) Jurisdiction	(4) Case/Docket/ Order No.	(5) Description of Violation
NOV- Covanta Southeastern Connecticut Company	8/16/2019	10/25/2019	Bureau of Materials Management, Water Permitting & Enforce.	17995	Based on submitted supporting documentation it was determined that the facility was NOT in violation
NOV- Covanta Southeastern Connecticut Company	11/24/2021		Bureau of Materials Management, Water Permitting & Enforce.	18209	Failure to comply with emissions limit

Check the box if additional sheets are attached. Copies of this form may be duplicated for additional space.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT C

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



SITE LOCATION
 Approximate center of site (CTECO):
 Latitude: 41.475589
 Longitude: -72.068786



**COVANTA SECONN RESOURCE RECOVERY FACILITY
 PRESTON, CONNECTICUT
 SITE LOCATION MAP**

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT D

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



Coastal Consistency Review Form

Please complete this form in accordance with the instructions (DEEP-INST-004). Print or type unless otherwise noted.

Part I: Project Information

DEEP USE ONLY

Application No.: _____

Analyst Assigned: _____

Date Received (LWRD): _____

1. Applicant Name: Covanta Southeastern Connecticut Company

Mailing Address: 132 Route 12

City/Town: Preston

State: CT

Zip Code: 06365

Business Phone: 860-889-4900

ext.:

Fax:

Contact Person: Kenneth Huebner

Phone: 860-889-4900

ext. 131

E-mail: khuebner@covanta.com

2. Preparer Name: Covanta Southeastern Connecticut Company

Mailing Address: 132 Route 12

City/Town: Preston

State: CT

Zip Code: 06365

Business Phone: 860-889-4900

ext.:

Fax:

Contact Person: Jacob Achey

Phone: 860-889-4900

ext. 135

E-mail: jachey@covanta.com

3. Street Address or Description of Location of the Project Site:

City or Town: Preston

4. Brief Project Description:

Covanta Southeastern Connecticut Resource Recovery Facility
application for Solid Waste Permit Renewal

5. Is the project located within the coastal boundary as defined in CGS section 22a-94(b)?

Yes No

If you answered **Yes** to this question, complete the entire form.

If you answered **No** to this question, and your project is located in a coastal area, skip Parts II through V and complete Parts VI, VII and VIII.

Part I: Project Information (continued)

Has an endangered or threatened species review for this proposed activity been prepared or submitted as part of another DEEP license application? Yes No

If Yes, proceed to Part II; if No, complete the question below.

6. ENDANGERED OR THREATENED SPECIES: According to the most current "State and Federal Listed Species and Natural Communities Map", is the activity which is the subject of this application located within an area identified as a habitat for endangered, threatened or special concern species?

Yes No Date of Map: 12 / 22

If yes, complete and submit a [Request for NDDDB State Listed Species Review Form](#) (DEEP-APP-007) to the address specified on the form, **prior** to submitting this application. **Please note NDDDB review generally takes 4 to 6 weeks and may require additional documentation from the applicant. A copy of the completed Request for NDDDB State Listed Species Review Form and the CT NDDDB response *must* be submitted with this completed application.**

For more information visit the DEEP website at www.ct.gov/deep/nddbrequest or call the NDDDB at 860-424-3011.

Part II: Identification of Applicable Coastal Use and Activity Policies and Standards

Identify all statutory goals and policies in or referenced by Section 22a-92 of the Coastal Management Act applicable to the proposed activities by checking the applicable boxes in the following table.

- General Development* - CGS Sections 22a-92(a)(1), 22a-92(a)(2), 22a-92(a)(9), 22a-92(a)(9)
- Water-Dependent Uses - CGS Sections 22a-92(a)(3), 22a-92(b)(1)(A)
- Ports and Harbors - CGS Section 22a-92(b)(1)(C)
- Coastal Structures and Filling - CGS Section 22a-92(b)(1)(D)
- Dredging and Navigation - CGS Sections 22a-92(c)(1)(C), 22a-92(c)(1)(D)
- Boating - CGS Section 22a-92(b)(1)(G)
- Fisheries - CGS Section 22a-92(c)(1)(I)
- Coastal Recreation And Access - CGS Sections 22a-92(a)(6), 22a-92(C)(1)(j), 22a-92(c)(1)(K)
- Sewer and Water Lines - CGS Section 22a-92(b)(1)(B)
- Fuel, Chemicals And Hazardous Materials - CGS Sections 22a-92(b)(1)(C), 22a-92(b)(1)(E), 22a-92(c)(1)(A)
- Transportation - CGS Sections 22a-92(b)(10)(F), 22a-92(c)(1)(F), 22a-92(c)(1)(G), 22a-92(c)(1)(H)
- Solid Waste - CGS Section 22a-92(a)(2)
- Dams, Dikes and Reservoirs - CGS Section 22a-92(a)(2)
- Cultural Resources - CGS Section 22a-92(b)(1)(J)
- Open Space and Agricultural Lands - CGS Section 22a-92(a)(2)

* applicable to all proposed activities

Part III: Consistency With Applicable Statutory Coastal Use and Activity Goals and Policies

Explain how the proposed activity is consistent with the applicable coastal activities goals and policies identified in Part II and describe any mitigation necessary to offset adverse impacts.

Covanta of Southeastern Connecticut (Covanta) owns and operates The Southeastern Connecticut Resource Recovery Facility which is located in Preston, Connecticut. The primary purpose of the Facility is to safely and in an environmentally sound manner convert solid waste into electrical energy. The Facility accomplishes this task through two Deutsche Babcock Anlagen Boilers utilizing a roller grate stoker system and one Alston steam powered turbine.

Part IV: Identification of Applicable Coastal Resources and Coastal Resource Policies

Identify the coastal resources and associated statutory policies that apply to your project by checking the applicable boxes in the following table.

Coastal Resources	on-site	adjacent to work site	off-site but potentially affected by the project
General Resources* - CGS Sections 22a-93(7), 22a-92(a)(2)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Beaches & Dunes - CGS Sections 22a-93(7)(C), 22a-92-(b)(2)(C), 22a-92(c)(1)(K)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bluffs & Escarpments - CGS Sections 22a-93(7)(A), 22a-92(b)(2)(A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Hazard Area - CGS Sections 22a-93(7)(H), 22a-92(a)(2), 22a-92(b)(2)(F), 22a-92(b)(2)(J), 22a-92(c)(2)(B), 22a-92(a)(5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Waters & Estuarine Embayments - CGS Sections 22a-93(5), 22a-93(7)(K), 22a-93(7)(L), 22a-93(7)(G), 22a-92(a)(2), 22a-92(c)(2)(A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Developed Shorefront - CGS Sections 22a-93(7)(I), 22a-92(b)(2)(G)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Freshwater Wetlands and Watercourses - CGS Sections 22a-93(7)(F), 22a-92(a)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Intertidal Flats - CGS Sections 22a-93(7)(D), 22a-92(b)(2)(D), 22a-92(c)(1)(K)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Islands - CGS Sections 22a-93(7)(J), 22a-92(b)(2)(H)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rocky Shorefront - CGS Sections 22a-93(7)(B), 22a-92(b)(2)(B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shellfish Concentration Areas - CGS Sections 22a-93(7)(N), 22a-92(c)(1)(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shorelands - CGS Sections 22a-93(7)(M), 22a-92(b)(2)(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tidal Wetlands - CGS Sections 22a-93(7)(E), 22a-92(a)(2), 22a-92(b)(2)(E), 22a-92(c)(1)(B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* applicable to all proposed activities

Part V: Consistency with Applicable Statutory Coastal Resource Goals and Policies

Explain how the proposed activity is consistent with the applicable statutory coastal resource goals and policies identified in Part IV and describe any mitigation necessary to offset adverse impacts.

Covanta is committed to operating a clean, efficient and well-maintained Facility. The facility's Litter Control Plan outlines the precautions taken to minimize site litter and dust. The Facility Ash and Material Management Plan describes the dust control measures taken with the residue trucks. The facility's SPCC Plan details actions taken to prevent the discharge of oil and oil products into or upon coastal resources by identifying potential discharges, establishing equipment and procedures to prevent the occurrence of a discharge and to provide immediate response and notification.

Part VI: Identification of Potential Adverse Impacts

Identify the adverse impact categories that apply to the proposed activity. Check the applicable box if the proposed activity has the potential to generate any adverse impacts defined in the Coastal Management Act and referred to in the following table. If the category is applicable to the proposed activity, you may describe in Part VII project design features which may eliminate or minimize the potential for identified adverse impacts.

Potential Resource Impacts	Applicable	Not Applicable
Characteristics & Functions of Resources - CGS Section 22a-93(15)(H)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Coastal Flooding - CGS Section 22a-93(15)(E)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Coastal Waters Circulation Patterns - CGS Section 22a-93(15)(B)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Drainage Patterns - CGS Section 22a-93(15)(D)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Patterns of Shoreline Erosion and Accretion - CGS Section 22a-93(15)(C)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Visual Quality - CGS Section 22a-93(15)(F)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Quality - CGS Section 22a-93(15)(A)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Wildlife, Finfish, Shellfish Habitat - CGS Section 22a-93(15)(G)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potential Impacts on Water Dependent Uses	Applicable	Not Applicable
Locating a non-water-dependent use on a site suited to or planned for a water-dependent use - CGS Section 22a-93(17)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Replacing an existing water-dependent use with a non-water-dependent use - CGS Section 22a-93(17)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Siting a non-water-dependent use which reduces or eliminates public access to marine or tidal waters - CGS Section 22a-93(17)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part VII: Consistency with Statutory Adverse Impact Policies

Explain how all potential adverse impacts identified, as applicable, in Part VI have been avoided, eliminated or minimized.

Under normal operating conditions, the Facility utilizes a water balance system that provides for zero discharge. Stormwater is routed through two Oil/Water Separators, the water is reused within the Facility. If the water can not be reused in the Facility, then it can be discharged to the Thames River in accordance with appropriate discharge permits from the Connecticut Department of Environmental Protection (CTDEP). The facility's Stormwater Pollution Prevention Plan details actions taken to prevent contamination of stormwater that may impact coastal resources by identifying potential discharges, establishing equipment and procedures to prevent the occurrence of a contamination and to provide immediate response and notification should a discharge/spill occur.

Part VIII: Remaining Adverse Impacts

Identify any adverse impacts which remain after incorporating all measures to eliminate or minimize such adverse impacts, and explain why no feasible and prudent alternatives exist that would further avoid or reduce such impacts.

No other remaining adverse impacts.

If this completed form is required as part of another DEEP license application, submit this completed form as instructed on the relevant application.

If this completed form is **not** required as part of another DEEP license application, submit this completed form to:

COASTAL PLANNING
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127




COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT E

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023

Natural Diversity Data Base Areas

PRESTON, CT
December 2022

-  State and Federal Listed Species
-  Critical Habitat
-  Town Boundary

NOTE: This map shows known locations of State and Federal Listed Species and Critical Habitats. Information on listed species is collected and compiled by the Natural Diversity Data Base (NDDB) from a variety of data sources. Exact locations of species have been buffered to produce the generalized locations.

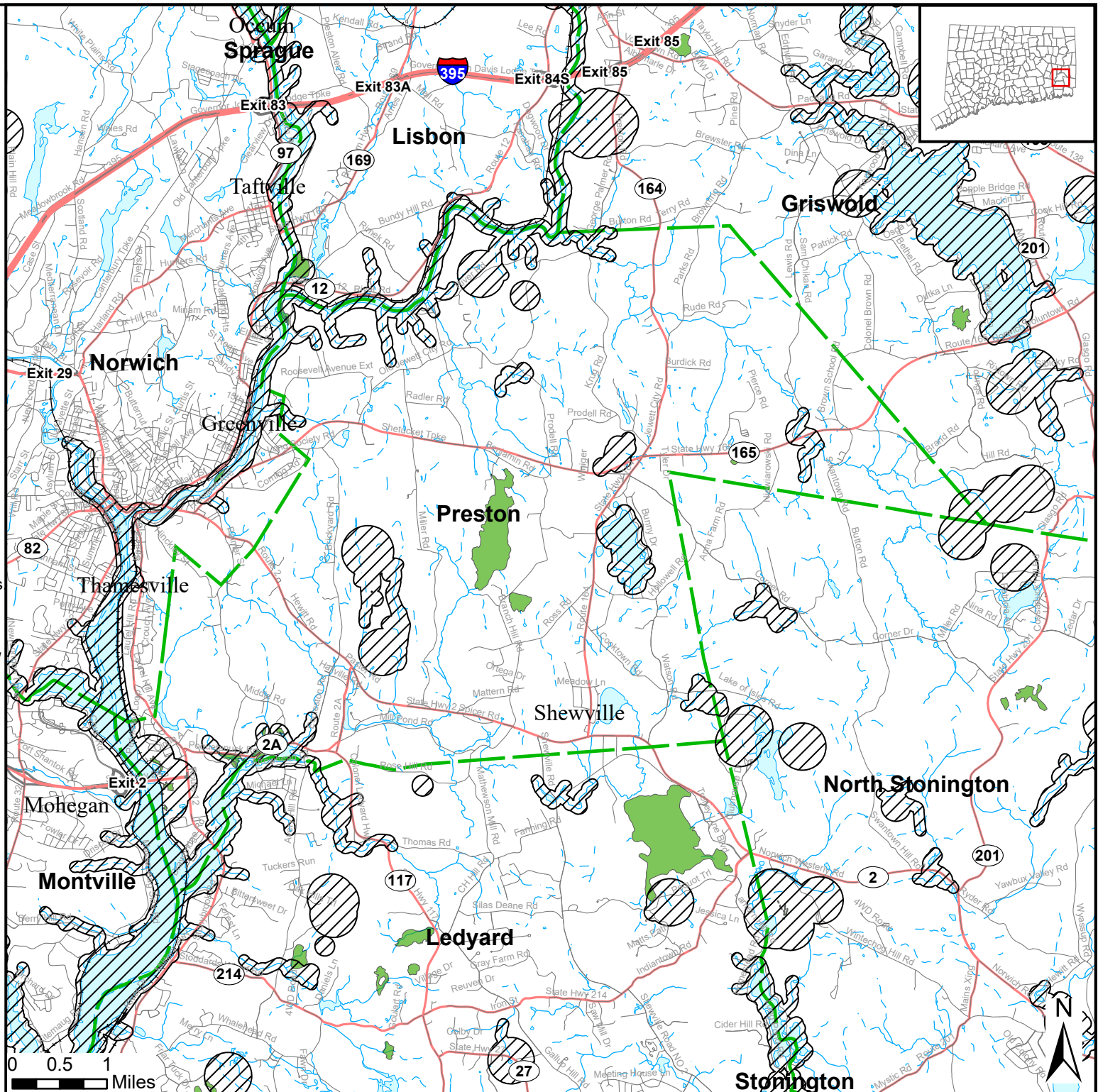
This map is intended for use as a preliminary screening tool for conducting a Natural Diversity Data Base Review Request. To use the map, locate the project boundaries and any additional affected areas. If the project is within a hatched area there may be a potential conflict with a listed species. For more information, use DEEP ezFile <https://filings.deep.ct.gov/DEEPPortal/> to submit a Request for Natural Diversity Data Base State Listed Species Review or Site Assessment. More detailed instructions are provided along with the request form on our website. <https://portal.ct.gov/deep-nddbrequest>

Use the CTECO Interactive Map Viewers at <http://cteco.uconn.edu> to more precisely search for and locate a site and to view aerial imagery with NDDB Areas.

QUESTIONS: Department of Energy and Environmental Protection (DEEP)
79 Elm St, Hartford, CT 06106
email: deep.nddbrequest@ct.gov
Phone: (860) 424-3011



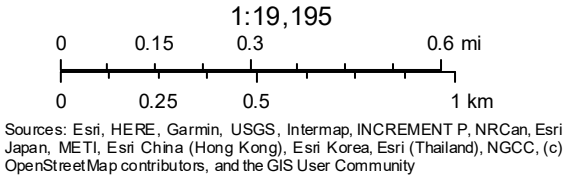
Connecticut Department of Energy & Environmental Protection
Bureau of Natural Resources
Wildlife Division



COVSEC NDDB Map



February 3, 2023



Generated by eNDDDB on:
2/3/2023

Jacob Achey
Towns: Preston
Preliminary Site Assessment: 1217213406

Subject: COVSEC NDDB

Current data maintained by the Natural Diversity Database (NDDDB) and housed in the DEEP ezFile portal, indicates that no populations of State Endangered, Threatened, or Special Concern species (RCA Sec. 26-306), and no Critical Habitats have been documented within or in close proximity to the area delineated.

Please be advised that this is a preliminary assessment and not a Natural Diversity Database determination. The purpose of this information is to provide a general planning tool which identifies those species that have been reported and may occur on or near the mapped area. A more detailed application and review will be necessary to move forward with any environmental authorization, permit, license, or registration applications submitted to DEEP. If such review is required, please return to the DEEP's ezFile Portal and select [Natural Diversity Database Review](#) to begin the review process.

This Preliminary Site Assessment does not preclude the possibility that species not previously reported to the Natural Diversity Database may be encountered on the site. You are encouraged to report incidental observations to the Natural Diversity Database using the [appropriate survey form](#) and follow the instructions for submittal. We recommend field surveys be conducted in order to evaluate potential habitat and species presence. Field surveys should be performed by a qualified biologist with the appropriate scientific collecting permits at a time when these target species are identifiable. A report summarizing the results of such surveys should include:

1. Survey date(s) and duration
2. Site descriptions and photographs
3. List of component vascular plant and animal species within the survey area (including scientific binomials)
4. Data regarding population numbers and/or area occupied by State-listed species
5. Detailed maps of the area surveyed including the survey route and locations of State listed species
6. Statement/résumé indicating the biologist's qualifications

The site surveys report should be sent to the CT DEEP-NDDDB Program (deep.nddbrequest@ct.gov) for further review by program biologists.

Natural Diversity Database information includes all information regarding listed species available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units

of DEEP, land owners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Database and accessed through the ezFile portal as it becomes available.

This letter is computer generated from our existing records and carries no signature. If however, any clarification/error is noted, or, if you have further questions, please contact the following:

CT DEEP Bureau of Natural Resources
Wildlife Division
Natural Diversity Database
79 Elm Street
Hartford, CT 06106-5127
(860) 424-3011
deep.nddbrequest@ct.gov

Please include a snapshot of the map, your last name, and the subject area town when you e-mail or write. Thank you for consulting the Natural Diversity Data Base.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT H

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023

Part III: Partnerships

Fill out this section if the applicant/owner/operator is a partnership.

Check here if additional sheets are necessary, and label and attach them to this sheet.

1. Indicate whether this is a general or limited partnership:			
2. Provide the following information for each partner. For limited partnerships, please identify the general partner:			
Name:			
Mailing Address:			
City/Town:	State:	Zip Code:	
Business Phone:	ext.	Fax:	
Contact Person:	Phone Number:		
Proportion of Ownership Interest (%):			
Name:			
Mailing Address:			
City/Town:	State:	Zip Code:	
Business Phone:	ext.	Fax:	
Contact Person:	Phone Number:		
Proportion of Ownership Interest (%):			
Name:			
Mailing Address:			
City/Town:	State:	Zip Code:	
Business Phone:	ext.	Fax:	
Contact Person:	Phone Number:		
Proportion of Ownership Interest (%):			
3. Have any of the partners involved in this project owned, operated or otherwise been associated with any other solid waste facility? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, provide the following information:			
Partner Name:			
Name of Other Facility:			
Position in Other Facility:			
Responsibilities:			
Partner Name:			
Name of Other Facility:			
Position in Other Facility:			
Responsibilities:			

Part IV: Corporations

Fill out this section if the applicant/owner/operator is a corporation.

Check here if additional sheets are necessary, and label and attach them to this sheet.

1. Corporation Name: **Covanta Holding Corporation**

2. List all parent and subsidiary corporations:

Name: **Covanta Holding Corp**

Mailing Address: **445 South Street**

City/Town: **Morristown**

State: **NJ**

Zip Code: **07960**

Business Phone: **862-345-5000**

ext.

Fax:

Contact Person:

Phone Number:

Name: **EQT Infrastructure**

Mailing Address: **1114 Avenue of Americas 45th Floor**

City/Town: **New York**

State: **NY**

Zip Code: **10036**

Business Phone: **917-281-0850**

ext.

Fax:

Contact Person: **Alex Darden**

Phone Number:

3. List all corporate officers:

Name: **Azeez Mohammed**

Mailing Address: **445 South Street**

City/Town: **Morristown**

State: **NJ**

Zip Code: **07960**

Business Phone: **862-345-5000**

ext.

Fax:

Name: **See Part IV Cont.:**

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

4. List all directors:

Name: **Howard Lance**

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Name: **See Part IV Cont.:**

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Part IV Cont.: Corporations

3. List all corporate officers:

Azeez Mohammed – Chief Executive Officer

Gregg Kam – Chief Financial Officer

Tequila Smith – Chief Sustainability Officer

Gagan Sood – Chief Transformation Officer

Paul Stauder – Chief Revenue Officer

Ginny Angilello – Chief Human Resources Officer

Adel Omrani – President East Region

Selma Kivran – President Midwest Region

Amir Hafzalla – President South Region

Nathan Cabbil – President West Region

Matthew Mulcahy – Head of Corporate Development

Tom Kenyon – General Counsel and Secretary

4. List all Directors

Howard Lance – Chairman of the Board

Alex Darden – Director

Sue Klug – Director

Elliott Laws – Director

Seth Myones – Director

Bob Preston – Director

Katherine Ryzhaya – Director

JD Vargas – Director

Part IV: Corporations (continued)

5. List all stockholders holding more than 20% of the corporate stock issued:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

6. Have any of the parties involved in this project owned, operated or otherwise been associated with any other solid waste facility? Yes No

If yes, provide the following information:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Part V: Limited Liability Company

Fill out this section if the applicant/owner/operator is a limited liability company.

Check here if additional sheets are necessary, and label and attach them to this sheet.

1. List each member.

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

2. List any manager(s) who, through the articles of organization, are vested the management of the business, property and affairs of the limited liability company.

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

Part V: Limited Liability Company (continued)

2. (continued) List any manager(s) who, through the articles of organization, are vested the management of the business, property and affairs of the limited liability company.

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Contact Person:

Phone Number:

Proportion of Ownership Interest (%):

3. Have any of the parties involved in this project owned, operated or otherwise been associated with any other solid waste facility? Yes No

If yes, provide the following information:

Name: **EQT Infrastructure**

Name of Other Facility: **Encyclis - UK & Ireland**

Position in Other Facility: **Parent Company**

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Part VI: Voluntary Association

Fill out this section if the applicant/owner/operator is a voluntary association.

1. Identify each member of the association.

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

Name:

Mailing Address:

City/Town:

State:

Zip Code:

Business Phone:

ext.

Fax:

2. Have any of the parties involved in this project been associated with any other solid waste facility?

Yes No

If yes, provide the following information:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

Name:

Name of Other Facility:

Position in Other Facility:

Responsibilities:

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT I

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023

Solid Waste Facilities

Attachment I: Statement of Consistency with the Solid Waste Management Plan

Please complete the form in accordance with the *Instructions for Completing the Permit Application for Construction and Operation of a Solid Waste Facility* (DEP-SW-INST-100). This form must be submitted with the *Permit Application for Construction and Operation of a Solid Waste Facility* (DEP-SW-APP-100). If additional space is required, please attach supplementary pages. Print legibly or type.

The Department of Environmental Protection (DEP) reserves the right to request any other information it deems pertinent.

Applicant Name: **Covanta Southeastern Connecticut**
(As indicated on the *Permit Application Transmittal Form*)

Identify the solid waste facility type: **Resource Recovery Facility**

Part I: Source of Waste

Identify the source(s) (the specific town(s) to be served) of the waste to be transferred/ processed/disposed of and whether the waste is residential, commercial, etc. Include estimated volumes and/or tonnages from each municipality/customer.

Source (Municipality/Customer)	Waste (Residential, Commercial, etc.)	Volume/Tonnage
See Attached Breakdown		

Part II: Waste Types

Describe each waste type and the quantity that will be handled at the facility. Describe how each waste type will be handled on-site (e.g., compaction, mechanically processed, hand separated, composted, incinerated, etc.).

Waste Type	Quantity	Process(es)
MSW	251,485 TPY & 689 TPD	Incineration
Special Waste	55 TPD Processed	Incineration

Part III: Waste Management

Identify each type of waste, how it is currently managed, and identify its long-term management plan (e.g., reused, recycled, composted, energy recovery, landfilled). If during processing a residue is generated, identify its quantity and/or percentage (e.g., tonnage or volume of residue generated and/or percentage of total waste incoming).

Waste Type	Current Management	Long-Term Management	Residue Quantity/Percentage
Ash Residue	Landfilled	Landfilled	10% of incoming MSW
Incinerated Scrap Metal-Ferrous	Recycled	Recycled	8,820 Tons (2022)
Incinerated Scrap Metal-NFerrous	Recycled	Recycled	884 tons (2022)
Non-Ash residues	Recycled	Recycled	70 Tons (2022)

Part IV: Waste Disposal

List each waste, residue and/or recyclable material and identify the final disposal facility/facilities or market(s) (e.g., list the specific facilities currently used or expected to be used in the future). Verify that the Connecticut facilities are currently permitted by DEP and the out-of state facilities are permitted by their state environmental regulatory agency and identify the permit type.

Wastes/Residues/Recyclables	Final Disposal Facility	Facility Permit Type
Ash Residue	Bondi Ash Landfill	SW-1160430-PO
Ash Residue	Putnam Ash Landfill	1160391
Incinerated Scrap Metal - Ferrous	Excel Recycling LLC	SW40-X270077
Incinerated Scrap Metal - Non Ferrous	Covanta Metals Management	

Part V: Contract/Agreements with Disposal Sites and/or Markets

Identify the duration (e.g., spot market, 4 months, 5 years, etc.) of the contract/agreement between the proposed facility and the facilities or markets to which the waste will be finally transported. (Include signed copies of contracts or letters of agreement from the potential disposal sites and/or markets and attach them to this sheet.) Demonstrate that these facilities have available long-term capacity to accept each waste, residue or recyclable from this proposed facility.

<p>Facility Name: Bondi Ash Landfill Contract Duration: Covanta Internal Agreement Long Term Capacity Demonstration for each waste/residue/recyclable: Landfill has capacity until May 2031</p> <p>Facility Name: Putnam Ash Landfill Contract Duration: Contract Expired in renewal Long Term Capacity Demonstration for each waste/residue/recyclable: Previous Contract attached</p> <p>Facility Name: Excel Recycling LLC. Contract Duration: 12/31/2024 Long Term Capacity Demonstration for each waste/residue/recyclable: Recyclables</p> <p>Facility Name: Covanta Metals Management Contract Duration: Covanta Internal Agreement Long Term Capacity Demonstration for each waste/residue/recyclable: Recyclables</p>
--

Part VI: Other Solid Waste Facilities

Are there any similar solid waste facilities currently operating in the area(s) to be served by this proposed facility?

Yes No

If yes, provide their names and addresses below.

Facility Name:			
Address:			
City/Town:	State:	Zip Code:	
Facility Name:			
Address:			
City/Town:	State:	Zip Code:	
Facility Name:			
Address:			
City/Town:	State:	Zip Code:	

Part VII: Statement of Consistency

In accordance with section 22a-209-4(b) (1) RCSA, the application package must include a statement by the applicant which explains how the proposal relates to and is consistent with the Solid Waste Management Plan (SWMP). Include a comparison of the facility's proposed long term waste management plan to specific goals discussed in the SWMP. Check here if additional sheets are necessary, and label and attach them to this sheet.

<p>The proposed long term waste management plan detailed in the Permit to Operate Renewal as is it relates to Covanta Southeastern Resource Recovery Facility is consistent with the Solid Waste Management Plan (SWMP) Specifically, Covanta Southeastern Connecticut plays a major part in managing the solid waste that ultimately must be disposed in an efficient, equitable and environmentally protective manner, while ensuring that residuals are managed in a manner that are also consistent with the solid waste hierarchy, including reducing, reusing & recycling residuals when possible.</p>

Source (Municipality/Customer	Waste (residential, commercial, etc)	Volume/Tonnage
ASHFORD	Res	475.89
BOZRAH	Res/Com	844.83
BLOOMFIELD	Res/Com	13.25
BRANFORD	Res/Com/Ind	281.61
BROOKLYN	Res	524.72
CANTERBURY	Res	1279.01
CLINTON	Res/Com/Ind	222.92
COLCHESTER	Res	4445.35
COLUMBIA	Res	82.45
COVENTRY	Res/Com	0.33
DANBURY	Res/Com	45.81
DANIELSON	Res/Com	46.04
DAYVILLE	Res/Com	667.69
EAST HADDAM	Res/Com	2820.92
EAST HAMPTON	Res/Com	3.15
EAST HAVEN	Res	5.55
EAST HARTFORD	Res/Com/Ind	17.07
EAST LYME	Res/Com	0.18
EAST WINDSOR	Res/Com	20.29
ESSEX	Res	19.79
FRANKLIN	Res	218.65
GLASTONBURY	Res/Com	0.38
GRISWOLD	Res	11.47
GROTON (INC GROTON LONG PT)	Res/Com/Ind	96.74
HARTFORD	Res/Com	39.64
KILLINGLY	Res/Com/Ind	5397.57
LEBANON	Res/Com	579.1
LEDYARD	Res/Com	4.77
LISBON	Res	302.66
MADISON	Res/Com	0.13
MANCHESTER	Res Com	1.27
MANSFIELD	Res	530.2
MERIDEN	Res/Com	0.44
MIDDLETOWN	Res/Com/Ind	384.99
MONTVILLE	Res/Com/Ind	0.33
NEW LONDON	Res/Com	0.04
NEW MILFORD	Res/Com/Ind	271.69
NORTH HAVEN	Res/Com	147.83
NORTH STONINGTON	Ind	13.34
NORWICH (INC CT HI-WAY GARAGE)	Res/Com	145.9
OLD LYME	Res	608.39
ORANGE	Com	10.21
PLAINFIELD	Res	4902.65
POMFRET	Res	419.05
PRESTON	Res/Com	220.03

PUTNAM	Res	1714.32
SALEM (INC SALEM COMMERCIAL)	Res	171.1
SO. WINDSOR	Res/Com	61.41
STAFFORD SPRINGS	Ind	536
STERLING	Res/Com/Ind	1061.81
STORRS	Res/Com	7.29
THOMPSON	Res	450.68
UNION	Res	40
VOLUNTOWN	Res/Com	846.37
WALLINGFORD	Com/Ind	29.73
WATERFORD	Com	0.39
WATERTOWN	Com	0.3
WAUREGAN	Res	6.79
WEST HAVEN	Ind	177.42
WETHERSFIELD	Com	0.6
WILLINGTON	Res	60.47
WILLIMANTIC	Res/Com/Ind	832.8
WINDHAM	Res/Com	150.51
WINDSOR	Com/Ind	172.78
WINDSOR LOCKS	Com	39.12
WOODSTOCK	Res	1085.09
BERLIN TS	Res/Com	7071.35
BOZRAH TS	Res/Com	766.97
BOZRAH VRF (SSS)	Res/Com	9324.03
BRANFORD TS	Res/Com	12936.06
BRISTOL EFW	Res/Com	581.66
ESSEX TS (MIRA)	Res/Com	14832.31
GUILFORD TS	Res/Com	1389.15
HARTFORD (MIRA-EFW)	Res/Com	443.22
MIDDLETOWN TS	Res/Com	1211.74
NEW HAVEN TS	Res/Com	28536.02
PLAINFIELD TS	Res/Com	4765.58
PLAINVILLE TS	Res/Com	23
SALEM TS	Res/Com	176.04
S. WINDSOR TS	Res/Com	5049.66
VOLUNTOWN/STERLING TS	Res/Com	353.04
WILLIMANTIC WASTE VRF/TS	Res/Com	78216.94
MASSACHUSETTS	Res/Com/Ind	26531.5
NEW YORK (INC. FISHERS ISL) + RIC TS	Res/Com	17.14
RHODE ISLAND	Res/Com/Ind	10316.76

Waste type: MSW
Current Mgmt: Resource Recovery
Long Term Mgmt: Resource Recovery

Waste type: CT Regulated Special Waste
Current Mgmt: Resource Recovery
Long Term Mgmt: Resource Recovery

Residuals:

1) Ash

Quantity: 10% of incoming MSW
Current Mgmt: Land filled
Long Term Mgmt: Land Filled (explore Beneficial use)

Disposal Facility: Bondi Island Landfill
Facility Permit:

Disposal Facility: Wheelabrator Putnam Monofil
Facility Permit: SW-1160430-PO (Permit number)

2) Ferrous

Quantity: 8,280 tons (in 2022)
Current Mgmt: Recycling
Long term Mgmt: Recycling

Disposal Facility: Excel Recycling
Facility Permit: SW40-X270077

3) Non-Ferrous

Quantity: 884 tons (in 2022)
Current Mgmt: Recycling
Long term Mgmt: Recycling

Disposal Facility: Covanta Metals Marketing
Facility Permit:

3) Oversized/Bulky Material:

Quantity: 70 tons (in 2022)
Current Mgmt: Recycling
Long Term Mgmt: Recycling

Disposal Facility: CT Scrap, LLC
Facility Permit:

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT J

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023

Solid Waste Facilities

Attachment J: Business Information

All permit applications, or license transfer requests, *for a solid waste facility*, must complete this form and attach all of the listed required documentation.

Part I: General Information

1. Applicant Name: Covanta Southeastern Connecticut Company
2. Facility Name: Covanta Southeastern Connecticut Company
3. Identify the solid waste facility type: Resource Recovery Facility
4. Is a surety specifically required by statute or regulation for the proposed project? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Are you prepared to post a bond or other surety related to any permits, certificates or approvals granted to you through this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Part II: Required Documentation

Check each box by each of the listed requirements as verification that all documentation has been submitted. Label each attachment as listed below and include the applicant's name on each document.

Financial Stability Information:
<input type="checkbox"/> Attachment 1: A detailed statement from a Certified Public Accountant which demonstrates the financial capacity of the applicant to develop and operate the project in a manner consistent with Connecticut environmental laws and standards.
<input type="checkbox"/> Attachment 2: With respect to the costs of financing, design, construction and start-up of the proposed facility, provide the following information. Note: for license transfer requests, if the facility is fully constructed, and already operating, provide the date operations began and skip to Attachment 3. Date Operations Began Estimated cost and identification of the source of funds for each facility; Identification and discussion of the proposed method of financing costs which will not be paid from the applicant's own resources; For costs to be paid from the applicant's own resources, demonstration that such resources are available (which may include third party assurances); Has the applicant, or its affiliates, ever implemented a project of comparable magnitude? If so, explain. If the proposed facility involves one million dollars or more in total capital cost, include a statement from an independent third party, certifying as to the reasonableness of such information.

Part II: Required Documentation continued on next page

Part II: Required Documentation, continued

Financial Stability Information, continued:

- Attachment 3: With respect to the on-going operation of the facility, provide the following information:

An estimate of the cost of operating and maintaining the facility, and a discussion of the source of revenues to pay such costs;

A discussion of the financial capacity of the applicant to properly operate the facility, and the proposed method of addressing potential, unexpected costs associated with environmental compliance, breakdowns, malfunctions and related events;

If other parties will be responsible for the operation of the facility, demonstrate the ability of such parties to meet the financial capacity to do so.

Land Ownership Documents:

- Attachment 4: In accordance with section 22a-209-4(b)(1) RCSA, signed copies of any lease, deed or other agreements regarding the ownership, control, or use of the facility by the applicant. Such documents include but are not limited to land deeds (e.g., warranty deed; certified deed; lease agreement; etc.).

Agreements Between Parties and Service Agreements and Contracts:

- Attachment 5: Copies of all contracts and agreements (e.g., bridge agreements; agreements between the applicant and owner, operator, municipality(s), regional authority, markets, disposal facility(s), other processing facilities, etc.)

(Note: All contracts required by section 22a-213 CGS and section 22a-209-5 RCSA involving a municipality *must be approved by DEP.*)

Organization Chart:

- Attachment 6: An organization chart, which illustrates the relationship between all parties involved in the ownership and management of the facility.

**AMENDMENT #4 TO FERROUS MATERIALS
PURCHASE AND SALE AGREEMENT**

This Amendment #4 dated as of June 3, 2022 amends the Ferrous Materials Purchase and Sale Agreement dated as of January 1, 2019, Amendment #1 dated as of October 16, 2019, Amendment #2 dated as of September 8, 2020 and Amendment #3 dated as of January 4, 2022 (collectively, the "**Agreement**") by between Covanta Metals Marketing LLC and Excel Recycling, LLC.

The terms used herein with the initial letter capitalized, unless otherwise defined herein, shall have the meanings therefore set forth in the Agreement.

THEREFORE, in consideration of their mutual promises set forth below and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, and intending to be legally bound, the parties hereby agree to amend the Agreement as follows:

1. Section 4 is hereby deleted and replaced with the following:

The term of this Agreement shall commence on January 1, 2019 and shall continue through December 31, 2024, unless sooner terminated in accordance with the provisions herein.

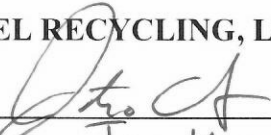
All terms and conditions set forth in the Agreement not specifically amended hereby shall remain in full force and effect.

IN WITNESS WHEREOF, the parties hereto have entered into this Amendment #4 to Ferrous Materials Purchase and Sale Agreement the date first above written.

COVANTA METALS MARKETING LLC

By: _____
Name: Robert Blenden
Title: Vice President, CMM

EXCEL RECYCLING, LLC

By:  _____
Name: Jonathan Costa
Title: V.P.



Powering Today. Protecting Tomorrow.

Covanta Bondi, LLC

A Covanta Company

141 Cranberry Highway

West Wareham, MA 02576

Tel: 508.291.4400; Fax: 508.291.4693

INTEROFFICE MEMORANDUM

To: Mark Van Weelden
From: Steven Melloni, Landfill Manager
Date: February 14, 2023
RE: Bondi's Island Landfill Capacity

The Bondi's Island Landfill (Landfill) is located in portions of Agawam and West Springfield, MA and is owned by the City of Springfield (City). Covanta operates the Landfill as part of an agreement with the City's Department of Public Works. The Landfill currently accepts residual ash from the Covanta SECONN and Covanta Bristol facilities in Connecticut, as well as alternative cover materials as approved by the MassDEP. The remaining areas for waste disposal have MEPA, Site Assignment and MassDEP approvals.

Assuming the current waste run rate, which includes the ash from SECONN and Bristol, and cover materials, the Landfill has capacity until May 2031.

If you need additional information regarding the Landfill, please contact me at this office.

AMENDMENT #2 TO WASTE DISPOSAL AGREEMENT

This Amendment #2 is dated as of August 19, 2020 and amends the Waste Disposal Agreement dated as of March 1, 2017 as amended by Amendment #1 dated December 19, 2018 (as amended, the "Agreement") by and between Covanta Sustainable Solutions, LLC and Wheelabrator Putnam Inc.

The terms used herein with the initial letter capitalized, unless otherwise defined herein, shall have the meanings therefore set forth in the Agreement.

THEREFORE, in consideration of their mutual promises set forth below and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, and intending to be legally bound, the parties hereby agree to amend the Agreement as follows:

1. The following sentence shall be added following the fifth sentence of Section 1.

Customer shall deliver to the Facility a minimum of 35,000 tons of Acceptable Waste during calendar year 2021 and 2022 (if the term is extended for such period as set forth in Section 9), and a maximum of 60,000 tons of Acceptable Waste for each such year, unless such Acceptable Waste is disposed of at a facility owned by or permitted to Customer or its affiliates (i.e., internalized.)

2. Section 9. Term. of the Agreement is amended and restate as follows:

The term of this Agreement shall begin on March 1, 2017 and continue through December 31, 2021, provided however that the term may be extended by mutual written agreement of the parties through December 31, 2022 subject to the TIP FEE set forth on Attachment C and minimum and maximum volume of Acceptable Waste set forth in Section 1 for such extension.

3. Attachment C is hereby modified by deleting the "Tip Fee" section and replacing it with the following:

CONTRACT PERIOD	TIP FEE
(1) March 1, 2017 through December 31, 2017	\$45.00 per ton
(2) January 1, 2018 through December 31, 2018	\$47.00 per ton
(3) January 1, 2019 through July 30, 2019	\$49.00 per ton
(4) August 1, 2019 through September 30, 2020	\$51.00 per ton
(5) October 1, 2020 through December 31, 2020	\$53.00 per ton
(6) January 1, 2021 through December 31, 2021	\$58.00 per ton
(7) January 1, 2022 through December 31, 2022	\$61.00 per ton


All terms and conditions set forth in the Agreement not specifically amended hereby shall remain in full force and effect.

IN WITNESS WHEREOF, the parties hereto have entered into this Amendment #2 to Waste Disposal Agreement the date first above written.

WHEELABRATOR PUTNUM INC.

By: _____
Name: _____
Title: _____

COVANTA SUSTAINABLE SOLUTIONS, LLC

By: 
Name: D. SCOTT PETERSON
Title: MARKET AREA VP

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT K

OPERATIONS MANAGEMENT PLAN

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



**SOUTHEASTERN CONNECTICUT RESOURCE RECOVERY FACILITY
OPERATIONS AND MANAGEMENT PLAN
January 2023**

Introduction

Covanta of Southeastern Connecticut (Covanta) owns and operates The Southeastern Connecticut Resource Recovery Facility (Facility) located in Preston, Connecticut. The Facility was designed and built to serve the solid waste disposal needs of southeastern Connecticut.

The Facility is located at 132 Route 12 (Old Military Highway) in Preston, Connecticut on approximately 8 acres of land. The Facility operates 24 hours a day, 365 days a year. The primary purpose of the Facility is to safely and in an environmentally sound manner convert solid waste into electrical energy. The Facility accomplishes this task through two Deutsche Babcock Anlagen Boilers utilizing a roller grate stoker system and one Alston steam powered turbine. Electrical power is distributed to Eversource Energy.

The intent of this document is to serve as an overview of the existing documentation for the Facility that references the items as identified in the Operations and Management Plan Guidelines. To the extent that the bulk of the information regarding a particular item is located elsewhere, a brief summary is provided, and the relevant location of the detailed information is cited. To the extent that this document serves as the primary location for that information, the relevant information is provided in its entirety. Since this is an existing Facility, items in the DEEP guideline that assume preparation prior to construction and operation of a Facility are not provided.

Traffic

The Facility typically receives about 40 to 70 refuse trucks per day during the week (Monday through Friday) and 5 to 15 trucks on Saturday. Of the total deliveries, approximately 80% will be tractor-trailers/walking floor trailers and 20% will be "packer" trucks. About 6 to 15 to 25 ash removal trucks will also enter and leave the Facility daily. The facility also receives 53' Van trailers and tanker trucks on an as needed basis as part of the Special Waste Disposal plan. These figures are approximate values subject to change depending on various operational circumstances, including but not limited to, waste disposal needs, operational upsets, and customer needs.

The plant is located on Route 12, a major two-lane arterial highway in the region. It is within 0.5 miles of Route 2A, which provides a direct link to Interstate Route 395.

Management

The staffing organization of the Facility is described in the September, 1998 revision of the Southeastern Connecticut Staffing Plan. This plan provides a plant organizational chart, and it describes the duties and responsibilities of each employee. Basically, the plant design provides for operation with a five-man shift with maintenance and operational support provided during the day shift. Additional personnel are made available during call-in activities and major maintenance periods or upsets.

The Facility receives refuse from approximately 5 a.m. until approximately 1 a.m., Monday through Friday and from approximately 7 a.m. until approximately noon on Saturday. The boilers operate continuously 24 hours per day, seven days per week.

Covanta has an extensive in-house training and certification program. Covanta has established procedures and training requirements necessary for in-house certification of employees at various levels of responsibility.

Fire Protection

Covanta SECONN is designed to minimize the potential for fire and for subsequent damage to Facility structures in the event a fire should occur. It is to provide fire-fighting apparatus throughout the Facility to be rapidly deployed in the event of a fire. Such deployment may be by company personnel or by outside fire-fighting personnel. The final step in the process for ensuring maximum fire fighting capability is to coordinate with outside fire-fighting personnel to ensure that they are knowledgeable in the Facility and are ready to respond in the event that there is a fire on the Facility grounds.

Equipment

The overview of equipment, operation, maintenance, and configuration is provided within the Municipal Waste Combustor Operating and Maintenance Manual required by Section 22a-174-38 of the Regulations of Connecticut State Agencies. This manual is reviewed and routinely updated to reflect changes within the operational procedures at the Facility.

Waste Receipt and Record Keeping

The Facility maintains daily records of waste received and ash shipped. Received refuse is tracked by the scale house and a dedicated computer system. Incoming trucks check in at the scale house where the gross weight, hauler and town of origin are recorded by computer. If the truck's tare weight is stored in the computer, the load weight is calculated. If a truck's tare weight is unknown the driver must return to the scale house so that the vehicle may be weighed, and the delivery weight can be calculated.

A similar system is used for determining the amount of ash shipped off-site. The scale house computer logs the outgoing load and stores the calculated weight for future reference.

Maintenance

Covanta is committed to operating a clean, efficient, and well-maintained Facility. The Facility's Litter Control Plan outlines the precautions taken to minimize site litter and dust. The basic procedures involve the monitoring of refuse delivery and discharge, as well as periodic litter patrols and daily mechanical sweeping of paved areas. The Facility Ash and Material Management Plan describes the dust control measures taken with the residue trucks.

Facility Maintenance is organized and prioritized by Covanta's Maintenance Department. Work orders are written for various tasks and are then prioritized based on their order of importance. Generally, Covanta personnel perform maintenance activities at the Facility; however, Covanta occasionally hires outside contractors to assist.

Operations

The Facility is permitted to combust 251,485 tons of refuse per year. Covanta is permitted to combust Authorized Special Waste and Auxiliary fuel as a supplement to the solid waste. These fuels include No. 2 fuel oil, Regulated Wood Fuel, and other fuels as approved by the Commissioner.

The refuse bunker at the Facility has the capacity to store enough refuse for approximately four days of operation. The bunker's waste storage capacity is based on both the volume below the truck tipping floor and the stockpiling capability against its back wall from the tipping floor level to the charging deck hopper level.

Covanta conducts a variety of refuse management techniques at any given time once the refuse is received on the tipping floor. These techniques are vital to maintaining steady, consistent operation of the boilers to ensure that the solid waste disposal requirements of the Facility are met. These techniques are also to improve combustion and boiler operation. They include inspecting, sorting, separating, mixing, fluffing, wetting, drying, loading, stacking, crushing, compacting of the refuse to enhance its quality and minimize operational downtime. Downtime events or poor operational performance that can result if one or more of these activities are not conducted and may include blocked feed chutes, jammed roller grates, slag formation, poor combustion, clogged ash extractors, excess residue and others.

Covanta has been issued a "Special Waste Disposal Authorization Plan" by the CTDEEP. This "SWDA" allows the facility to accept waste other than exclusively MSW. Special waste deliveries are scheduled 48 hours in advance to ensure the Facility can receive the waste. If the waste is approved for pit feed, the vehicle proceeds the same as a typical delivery. If the Special Waste is approved for a hopper feed, the hauler is directed to the maintenance laydown area. At this point, the facility will assist with offloading the material, escort up the elevator, and deposit the material directly into the hopper. If the non-hazardous Industrial wastewater is approved for Liquid Direct Injection (LDI), the hauler is directed to the 16000 gallon portable bulk storage tank. Once hoses are connected, the driver will be instructed to begin offloading.

By-pass waste occurs when solid waste is received at the Facility but not processed by combustion and is sent to another disposal location. Situations that lead to the receipt of by-pass waste include, but are not limited to, boiler start-up, shutdown, malfunction events, Facility fires, emergencies, severe storms, scheduled and unscheduled boiler outages, excessive amounts of contracted delivered to the Facility or that the Facility is obligated to accept.

The handling of by-pass waste will occur on the tipping floor by way of the front-end loader or loaders that will be used to load refuse trucks and/or trailers destined for off-site disposal locations. In an effort to minimize the disturbance to incoming wastes deliveries this activity may occur at times when incoming deliveries have ceased for the day.

By-pass waste storage will occur on the tipping floor for a temporary period. The containers should be designed to prevent leakage, spillage and disposal of solid waste.

By-pass waste disposal may occur at either an in-state solid waste disposal site(s) or an out-of-state disposal site(s). Disposal capacity, disposal costs, transportation costs, are among the issues that may influence Covanta in the decision making process when determining a By-pass waste disposal location.

Certain components of solid waste that are received at the Facility cannot be processed by combustion and must be sent off-site for recycling and/or disposal. Situations that lead to the receipt of non-ash residue include, but are not limited to, material separated during inspection and/or processing prior to combustion, material separated post combustion. The following section describes Covanta's management program as it appears in Covanta's Ash and Materials Management Plan.

The handling of non-ash residue occurs primarily on the tipping floor by way of the front-end loader or loaders that will be used to load trucks and/or trailers destined for off-site recycling and/or disposal locations.

Non-ash residue storage may occur on the tipping floor for a temporary period. If additional storage space is needed the Facility may utilize two 50 cubic yard covered containers. The containers will be designed to prevent leakage, spillage, and disposal of solid waste. These containers may be stored outdoors until the time of off-site shipment occurs.

Non-ash residue material recycling and/or disposal may occur at either an in-state solid waste disposal site(s) or an out-of-state disposal site(s). Disposal capacity, disposal costs, transportation costs, are among the issues that may influence Covanta determination of Non-ash residue disposal locations.

Monitoring and Environmental Controls

Flue Gas Monitoring

The Facility is equipped with advanced, reliable systems for the control and capture of air pollutants. Primary and secondary airflow is carefully monitored to ensure even and complete combustion. Sulfur oxides and acid gases are removed by the acid gas control

system, which sprays an aqueous alkaline solution through the gas to neutralize acids and cool the flue gas. A Selective Non-Catalytic Reduction system is in place in order to reduce NOx emissions. A fabric filter is used to remove particulates and the associated heavy metals.

Compliance with the Connecticut Department of Energy and Environmental Protection air quality standards, while combusting refuse, is accomplished through the use of the Facility's Continuous Emissions Monitoring System. The system monitors a variety of activities including some of the following parameters at either the boiler outlet, the I.D. fan inlet, or both locations:

- sulfur dioxide concentration, corrected to 12% C02 (outlet and inlet);
- carbon monoxide concentration, corrected to 12% C02 (outlet);
- carbon dioxide concentration (outlet and inlet);
- nitrogen oxides concentration, corrected to 12% C02 (inlet); and
- opacity (stack)

Boiler parameters related to environmental performance or permit limits are also monitored continuously.

Water

Under normal operating conditions, the Facility utilizes a water balance system that provides for zero discharge. Plant wastewater, aside from domestic sewage discharges, is directed eventually to the low quality sump, from where it is used to quench ash and provide acid gas scrubber water. If the sump is overloaded, or an upset occurs (i.e., a boiler outage), water that must be discharged will be directed, as permitted, to the sanitary sewer system.

Facility discharges of storm water runoff from developed land, inclusive of buildings, equipment, access roads, and parking lots, are discharged through two oil/water separators, as part of the storm water system, and one detention basin. The two-oil/water separators are each 1,964 cubic feet and the detention basin is 81,000 cubic feet in size. The detention basin is emptied as needed and, to the extent possible, the water is reused within the Facility. If the water can not be reused in the Facility, then it can be discharged to the Thames River in accordance with appropriate discharge permits from the Connecticut Department of Energy and Environmental Protection (CTDEEP).

Noise

In order to minimize noise within the Facility and noise generation from this Facility, a number of steps have been undertaken both in design and continued operation of the Facility. Material design with the building walls and roofing was specified to provide suitable sound absorption and deflection within the Facility. Air compressors are in one general area so that the acoustical impacts can be contained and minimized.

Once the Facility began operation, a sound level map was developed in compliance with OSHA and to identify any sources of noise which may increase the sound levels emanating from the Facility. If excess noise sources are located, efforts are taken to minimize and reduce those noise levels using engineering means. For example, a sound reduction system has been installed over the I.D. Fans to reduce the potential of off-site sound.

Dust and odor

To minimize fugitive dust emissions associated with waste handling and unloading, the tipping hall and waste bunker is enclosed and fitted with large access doors. A negative draft is maintained in the tipping hall and waste bunker areas. This occurs by drawing primary combustion air and utilizing it as combustion air in the boiler.

Fugitive particulate emissions from the residue handling activities are contained as the residue conveyors, storage bunker, and loading equipment are totally enclosed. The residue is discharged from the furnaces into a quench tank, thereby wetting the residue before it is conveyed to the storage bunker. Fly ash collected in the pollution control devices is also conveyed in an enclosed system and moistened to reduce fugitive emissions. The combined residue is loaded into trucks in a front-end loader and transported to the residue landfill in covered trucks.

To further minimize potential dust emissions, the tipping hall and general grounds are cleaned on a regular basis. Roadways are swept daily utilizing a mechanical street sweeper.

The Facility is not a source of off-site odor in the surrounding neighborhood. All waste handling activities take place in enclosed buildings with access doors. As mentioned above, the tipping hall and waste storage bunker are maintained under negative draft by drawing primary combustion air from these areas. Potential malodorous pollutants from solid waste or truck exhaust are drawn into the furnace. The primary air is introduced into the furnaces through the roller grates, thereby subjecting these pollutants to direct flame, high temperature oxidation. Secondary air is drawn from the boiler house, thereby minimizing odors collecting in this area.

Emergencies

Fire emergency control and procedures are incorporated within the Facility's Emergency Action Plan. This plan also addresses, in detail, procedures to follow in the event of medical emergencies, chemical and fuel spills, threatening acts, major storms, and the receipt of radioactive waste.

Provisions have been instituted to ensure that mass quantities of items which have been collected to be recycled are not knowingly accepted by the Facility. Under these provisions, a large number of the waste loads are visually inspected by plant personnel to see if significant quantities of unacceptable wastes, i.e. bulk quantities of recyclables, are contained on the trucks

being inspected. Any hauler or loads that appear suspicious are also directed for further investigation. The vehicle selected for inspection is directed to an available tipping location for placement of its load on the floor away from other vehicles. After depositing the waste load on the floor, the waste is visually inspected for hazardous waste, bio-medical waste and significant quantities of bulk recyclables. Any such waste identified is separated out by hand, front end loader and/or other safe means.

If unacceptable waste is identified during the inspection process, the waste is either immediately placed back on the truck for proper disposal or is separated out manually or by use of a front-end loader and placed to the side for off-site disposal. Hazardous waste, bio-medical waste, radioactive waste are not acceptable for disposal at the Facility.

Haulers or waste generators which consistently deliver unacceptable waste are subjected to more frequent inspections and other actions including written warnings, dialogue, surcharges, and exclusion from delivery to reduce the delivery of such types of waste.

Random spot checks and inspections that discover unacceptable wastes may be recorded on inspection sheets and kept on file. Each spot check or occurrence of unacceptable waste may be recorded as to the following:

- Date and time of occurrence.
- Operator conducting the inspection.
- Hauler company name.
- Truck I.D.
- Nature of unacceptable waste.
- Disposal of unacceptable waste.

In order minimize unacceptable waste from entering the Facility, a handout is available to haulers advising them of the prohibition of certain types of wastes. The handout is provided at the scale house and is also provided to anyone inquiring about waste disposal restrictions.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

LITTER CONTROL PLAN

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



COVANTA SOUTHEASTERN CONNECTICUT RESOURCE RECOVERY FACILITY

LITTER CONTROL PLAN

Rev: February 2023

Covanta of Southeastern Connecticut (Covanta) Southeastern Connecticut Resource Recovery Facility is designed to receive refuse in covered or contained vehicles and will only be deposited within the tipping hall areas either directly into the tipping bays or upon the tipping hall floor. These refuse receipt procedures are believed to minimize, to the extent practical, the generation of litter within the facility. To the extent that debris or litter is found on the site, or in the driveways to the site, Covanta personnel will provide general housekeeping on a regular basis.

The Operations Supervisor shall assume full responsibility for maintaining the exterior of the facility. The exterior grounds shall be maintained in a manner that is free of litter and debris. The company will require all refuse trucks to be generally cleaned out and all equipment secured before leaving the tipping bay, so as not to drop solid waste out of the truck when departing the site.

High traffic paved areas on site will be swept/cleaned on a regular basis to prevent accumulation of dirt and debris on paved surfaces and in catch basins. This includes but is not limited to using a street cleaning to sweep paved surfaces. Operations ensure that the areas outside of the tipping bay doors are kept in a clean condition. Periodic maintenance is performed to maintain the facility and remove any on-site litter that may accumulate during normal operation.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ASH MANAGEMENT PLAN

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



**SOUTHEASTERN CONNECTICUT RESOURCE RECOVERY FACILITY
ASH AND MATERIAL MANAGEMENT PLAN
Prepared: January 2008 Revised: February 2023**

INTRODUCTION

The Southeastern Connecticut Resource Recovery Facility (Facility) as it relates to the Covanta of Southeastern Connecticut (Covanta) receives and combusts household MSW wastes and non-hazardous industrial and commercial waste including approved special wastes. Hazardous waste is not acceptable for disposal at the Facility. During normal operation, Covanta encounters various waste materials that must be processed or managed at the Facility. This plan has been prepared to describe the management of these materials and identify the recycling and/or disposal options and the recycling and/or disposal locations for these items.

MATERIAL IDENTIFICATION

By-pass waste- means any solid waste, contractually defined as acceptable waste destined for or received at the Facility but is not processed at the Facility for any reason and which must be disposed of by other means.

Non-ash residue- means solid waste received at the Facility but determined by Covanta to be unsuitable for combustion and is disposed of by means other than combustion at the Facility.

Ash Residue- means bottom ash, air pollution control residue, or other residue from the combustion process.

Incinerated scrap metal - means any ferrous or non-ferrous metal that is removed from the ash residue after combustion.”

BY-PASS WASTE

By-pass waste occurs when solid waste is received at the Facility but not processed by combustion and is sent to another disposal location. Situations that lead to the receipt of by-pass waste include, but are not limited to, boiler start-up, shutdown, malfunction events, Facility fires, emergencies, severe storms, scheduled and unscheduled boiler outages, excessive amounts of contracted delivered to the Facility or that the Facility is obligated to accept.

The handling of by-pass waste will occur on the tipping floor by way of the front-end loader or loaders that will be used to load refuse trucks and/or trailers destined for off-site disposal locations. To minimize the disturbance to incoming wastes deliveries this activity may occur at times when incoming deliveries have ceased for the day.

By-pass waste storage will occur on the tipping floor for a temporary period.

By-pass waste disposal may occur at either an in-state solid waste disposal site(s) or an out-of-state disposal site(s). Disposal capacity, disposal costs, transportation costs, are among the issues that may influence Covanta in the decision-making process when determining a By-pass waste disposal location.

NON-ASH RESIDUE

Non-ash Residue occurs when certain components of solid waste that are received at the Facility can not be processed by combustion and must be sent off-site for recycling and/or disposal. Situations that lead to the receipt of non-ash residue include, but are not limited to, material separated during inspection and/or processing prior to combustion.

The handling of non-ash residue occurs primarily on the tipping floor by way of the front-end loader or loaders that will be used to load trucks and/or trailers destined for off-site recycling and/or disposal locations.

Non-ash residue storage may occur on the tipping floor in one 50 cubic yard container. If additional storage space is needed the Facility may utilize an additional 50 cubic yard covered container. The containers will be designed to prevent leakage, spillage, and disposal of solid waste. These containers may be covered and stored outdoors until the time of off-site shipment occurs.

Non-ash residue material recycling and/or disposal may occur at either an in-state solid waste disposal site(s) or an out-of-state disposal site(s). Disposal capacity, disposal costs, transportation costs, are among the issues that may influence Covanta in the decision-making process when determining a non-ash residue disposal location.

INCINERATED SCRAP METAL

Incinerated scrap metal occurs when ferrous and non-ferrous metals that were mixed with MSW are pulled out post combustion and must be sent off-site for recycling/or disposal. During normal operation, a ferrous recovery system is used at the ash discharge point of the belt conveyor in the residue storage building. Recovered ferrous is deposited into a separate pile inside of the storage building. A non-ferrous recovery system extracts the non-ferrous material and deposits it on a belt conveyor which is discharged into a small dumpster and consolidated in a two 50 cubic yard covered containers.

The handling of Incinerated scrap metal occurs in the Ash Load-Out building by way of Ferrous and non-ferrous handling systems and front-end loader that will be used to load trucks and/or trailers destined for off-site recycling/or disposal locations.

Incinerated scrap metal storage may occur in the Ash load out building and in two 50 cubic covered containers. The containers will be designed to prevent leakage, spillage, and disposal of solid waste.

Incinerated scrap metal recycling and/or disposal may occur at either an in-state solid waste disposal site(s) or an out-of-state disposal site(s). Disposal capacity, disposal costs, transportation costs, are among the issues that may influence Covanta in the decision-making process when determining an incinerated scrap metal recycling/disposal location.

ASH RESIDUE

Generation of Ash Residue

The estimated quantity of combined residue that is generated by the facility on a percentage basis is approximately 25% to 30% of the weight of the charged refuse. Approximately 85% by weight of the ferrous material contained in the residue will be recovered by the facility's ferrous removal system when in use.

Handling of Ash Residue

Much of the Ash residue produced at the Facility (approximately 85%) is bottom ash, which comes from the boiler and drops into the ash extractor, where it is quenched to cool it and wet it. The quench water is provided from the low-quality sump, which is the repository for some in-plant waters. Any spillage from this quench system would end up back in the low-quality sump. The residence time in the ash extractor is such that the resultant moisture content of the ash is in the range of 15% to 30%. This moisture ensures that fugitive dust emissions are kept to a minimum. While the system maintains a 15% to 30% moisture content, plant upsets (such as: water balance problems, tube ruptures and roller grate trips) could result in moisture content of the residue that are different than these estimated ranges.

The bottom ash is pushed up an incline and out of the ash extractor by a hydraulic ram and deposited on a slipstick conveyor. In normal operation, this conveyor transports the ash to a belt conveyor, which in turn conveys the ash into the ash residue storage building. In bypass mode, the ash is discharged from the slipstick conveyor onto another slipstick conveyor (parallel to the primary belt conveyor), which transfers the ash to a drag chain conveyor that in turn discharges onto the ash building floor and is kept separate from the main ferrous pile by a retaining wall.

The remaining Ash residue produced at the facility (approximately 15%) is fly ash which is carried from the baghouse hopper discharge valves, spray dry absorber discharge valves, and boiler hopper discharge valves by screw conveyors to an enclosed drag chain conveyor. There is one drag chain conveyor for each of the two boiler trains. These conveyors enter the boiler building and normally discharge to a silo that feeds to the Mawcaber pneumatic conveyor. The fly ash and salts from the Mawcaber are conveyed to the Dustmizer silo via a pneumatic pipe. The Dustmizer silo serves as a temporary storage site for the fly ash system. When the level in the silo reaches a predetermined setpoint, the rotary valve automatically starts, the fly ash and salts are mixed with water to condition them for handling and transport. The Dustmizer drops onto the ash handling building floor forming a third pile separate from the bottom ash and ferrous metals. In bypass mode, the fly ash is diverted into the pugmill, where ash is mixed with water to minimize dusting. The conditioned fly ash is discharged onto the belt conveyor that leads to the ash residue storage building.

Residue removal trucks enter the enclosed Ash load out building and are loaded with ash residue by means of a front-end loader. Following loading, the trucks are covered with a tarp before leaving the enclosed area.

The Ash residue handling system is completely contained within buildings to preclude fugitive dust from leaving the facility and to prevent migration of the ash due to rainfall. Methods to preclude the migration of ash from the facility either via airborne fugitive dust, via water transport, or via ash dragout are accomplished by:

1. Wetting the ash;
2. Placing curbing in the ash load area;
3. Regular sweeping of the facility grounds; and
4. Regular checking for ash track out at the truck doors to the ash building.

Residue Storage

The principal mechanism of ash storage is on the floor in the residue building that has approximately a three-day capacity when running at full load. Supplemental storage capacity is available by placement of the ash on the tipping floor or in covered containers.

In the unlikely event of a short-term interruption of ash residue transportation and/or disposal, additional storage capacity of about 5,000 cubic yards/3,750 tons may be provided by storing the ash in a pile(s) on the tipping floor within the tipping hall building.

Additionally, temporary storage of ash residue may occur on the tipping floor in emergency situations and in two 50 cubic yard containers which are designed to prevent leakage, spillage and dispersion of residue may be stored outdoors until the time of off-site shipment occurs.

Ash Residue Disposal

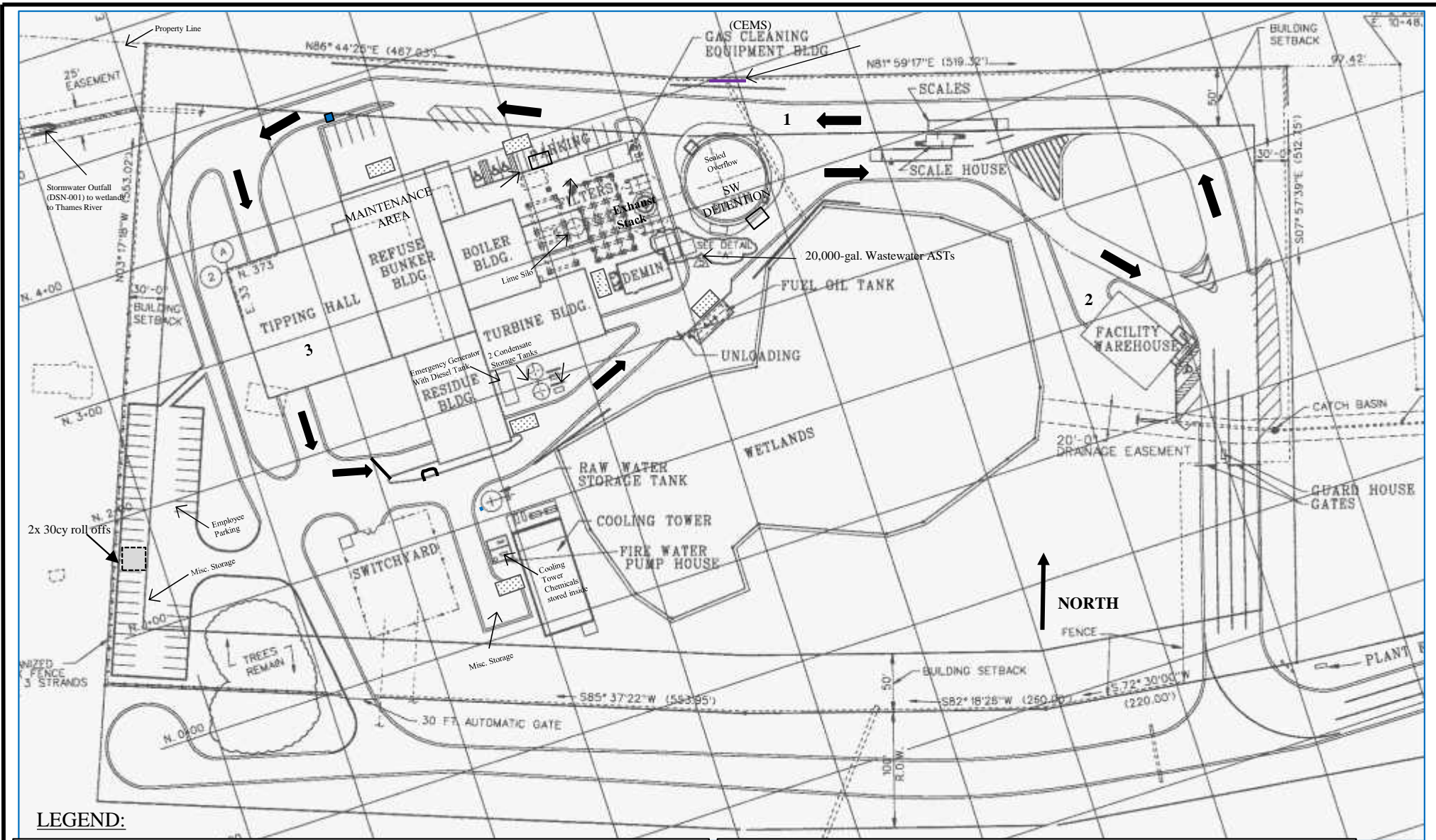
Generators of the waste have the responsibility for disposing of the residue generated by the combustion of that waste. Residue generated at the Facility will be disposed of at the following locations: the Putnam Landfill located at 344 River Road in Putnam, Connecticut and the Bondi Landfill located at 188 M Street in Agawam, Massachusetts. Other permitted landfills would be considered to dispose of the Facility's ash should these designated landfills no longer be available.

The Putnam Landfill is owned and operated by Wheelabrator of Putnam, Inc. and permitted to accept ash residue under Connecticut Department of Environmental Protection Permit No. 1160430-PO dated May 6, 1999. The Bondi Island Landfill is owned by the City of Springfield and operated by Covanta Bondi, LLC (Covanta) and permitted to accept ash residue under Massachusetts Department of Environmental Protection Permit No. 1160430-PO dated May 6, 1999.

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

FACILITY SITE PLAN

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



**COVANTA SECONN RESOURCE RECOVERY FACILITY
 PRESTON, CONNECTICUT**

FACILITY SITE PLAN Rev 2023

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

ATTACHMENT N

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023

Attachment N: Certification Regarding Activities Previously Licensed by DEP


Applicant Name: **Covanta Southeastern Connecticut Company**
 (as indicated on the *Permit Application Transmittal Form*)

Where there has been no change in solid waste activities previously licensed by DEP, certain supporting documents may be incorporated by reference into an application by completing the following certification indicating that *no* changes have been made to the permitted facility and the supporting documents since the documents were submitted and approved by DEP. The documents that are eligible for incorporation by reference are listed below. You are not required to resubmit such documents unless requested by DEP.

This certification must be signed as indicated in the instructions (DEP-SW-APP-100) under Part VII: Applicant Certification, and shall certify as follows: "I have examined the documents identified by checking the applicable boxes below which were previously submitted for permit issuance to the Department of Environmental Protection for the activities which are the subject of this application, and certify that to the best of my knowledge and belief, *no* modifications or changes have been made to the permitted facility and supporting documentation since such documents were approved by the Department of Environmental Protection. I further certify that I will submit such documents to the Department of Environmental Protection upon written request."

Please check the appropriate boxes indicating which documents you are proposing to incorporate into this application by reference and provide the latest date that each document was updated.

<input type="checkbox"/>	<i>Background Information: (Applicant/Owner/Operator Info)</i> (DEP-SW-APP-101)	Rev. Date:
<input type="checkbox"/>	<i>Statement of Consistency with Solid Waste Management Plan</i> (DEP-SW-APP-102)	Rev. Date:
<input checked="" type="checkbox"/>	<i>Business Information.</i> (DEP-SW-APP-103)	Rev. Date:
<input checked="" type="checkbox"/>	Applicant's Financial Stability Information	Rev. Date: 08/1998
<input checked="" type="checkbox"/>	Land Ownership Documents	Rev. Date: 08/1998
<input checked="" type="checkbox"/>	Agreements between all parties involved in the project for the ownership, control, and use of the facility	Rev. Date: 08/1998
<input type="checkbox"/>	Service agreements and/or contracts with markets, users, final disposal sites, or other processing facilities	Rev. Date:
<input checked="" type="checkbox"/>	Planning and zoning approval (required only for applications to construct and operate landfills, incinerators, or resources recovery facilities)	Rev. Date: 08/1998
<input type="checkbox"/>	<i>Determination of Need Information</i> (DEP-SW-APP-104)	Rev. Date:
<input checked="" type="checkbox"/>	Facility Plan (not required for applications to construct and operate a solid waste disposal area, e.g. landfill):	Rev. Date:
<input checked="" type="checkbox"/>	Engineering drawings	Rev. Date: 08/1998
<input type="checkbox"/>	Operation and Management Plan	Rev. Date:
<input type="checkbox"/>	<i>Checklist for Solid Waste Disposal Areas (Landfills)</i> (DEP-SW/WD-APP-110)	Rev. Date:

	2/16/2023
Signature of Applicant	Date
Kenneth Huebner	Facility Manager
Name of Applicant (print or type)	Title (if applicable)
Permit Number:	

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

PERMIT TO OPERATE ISSUED: 6-20-2013

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



PERMIT TO OPERATE

PERMITTEE: Covanta Southeastern Connecticut Company
FACILITY ADDRESS: 132 Military Highway, Preston, CT 06365
PERMIT No.: 11401089-PO

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 OPERATE IS HEREBY ISSUED by the Commissioner of the Department of Energy and Environmental Protection ("Commissioner") to Covanta Southeastern Connecticut Company ("Permittee") to operate the Resources Recovery Facility ("Facility") located at 132 Military Highway, Preston, Connecticut. Subsequently, the Permit to Operate No. 1140636-PO issued on May 16, 2003 IS HEREBY EXPIRED.

A. GENERAL TERMS AND CONDITIONS

1. This Permit is based on and incorporates by reference pertinent and appropriate sections of documents and specifications submitted as part of Application No. 200800083, including:
 - a. Application form(s) dated January 11, 2008;
 - b. Operation and Management Plan (O&MP) dated January 2008;
 - c. Letter to Diane Duva of the Department from the applicant dated February 24, 2009 responding to comments;
 - d. Attachment L dated February 24, 2009 from the Permittee certifying that the Facility continues to be operated in compliance with various documents previously submitted to the Department;
 - e. E-mail dated August 4, 2009 from the Permittee to the Department with various attachments, clarifying various on-site storage limits and specifications and proposed solid waste off-site transfer; and
 - f. Site Plan prepared by Ford, Bacon and Davis Incorporated dated April 15, 1989 last revised September 30, 1991.

The Permittee shall maintain records of all documents comprising and all data pertaining to the application(s) mentioned in this condition, as well as any supplemental information submitted to the Department in connection with such application(s). 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:

"Ash Residue" means bottom ash, air pollution control residue, or other residues from the combustion control process.

"Bypass Waste" means any solid waste, contractually defined as Acceptable Waste, destined for or received at the Facility but not processed at the Facility for any reason and which must be disposed of by other means.

“Certified Operator” means the solid waste facility operator or an employee of such operator who is present on site and oversees or carries out the daily operation of the Facility, and whose qualifications are approved in accordance with Section 22a-209-6 of the RCSA, which requires that a certified operator is present at the Facility during operating hours at all time.

“Commissioner” means the Commissioner of the Department of Energy and Environmental Protection or the Commissioner’s duly authorized designee.

“Day” means calendar day.

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

“Designated Recyclable Item” pursuant to Section 22a-207(27) of the CGS 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 CGS section 22a-256 or 22a-208v.

“Facility” means the location identified in this Permit at which the activities authorized herein are conducted.

“Incinerated Scrap Metal Fragments” means any ferrous-or non-ferrous metal that is removed from the ash residue after combustion at the Facility.

“Municipal Solid Waste” or *“MSW”* means a solid waste from residential, commercial and industrial sources, excluding solid waste consisting of significant quantities of hazardous wastes, land-clearing debris, demolition debris, biomedical waste, sewage sludge and scrap metal.

“Non-ash Residue” means any solid waste received at the Facility but determined by the Permittee to be unsuitable for combustion and which must be disposed of by means other than combustion at the Facility.

“Non-Processible Waste” means non-processible waste as defined in the Operations and Management Plan, which is incorporated herein by reference.

“Operation” means operation of the Facility, including operation for the purposes of start-up, shutdown or performance testing.

“P.E.” means Professional Engineer licensed in the state of Connecticut.

“Processed Construction and Demolition (C&D) Wood” or *“Regulated Wood Fuel”* as defined in Section 22a-209a of the CGS means the wood portion of the construction and demolition waste which has been sorted to remove plastics, plaster, gypsum wallboard, asbestos, asphalt shingles, in Section 22a-209a of the CGS and wood which contains creosote or to which pesticides have been applied or which contains substances defined as hazardous waste under Section 22a-115 of the CGS.

“Processing” means the reduction in volume of municipal solid waste (MSW) through the conversion thereof into resource derived fuel through combustion.

“Special Waste” includes wastes defined in RCSA Section 22a-209-1 handled in a manner in conformance with CGS 22a-208y and the Facility’s Special Waste Disposal Plan, which may be updated from time to time.

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 is 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) are not significantly changing the nature of the Facility, or its impact on the environment; and (c) does not warrant the issuance of a permit or authorization pursuant to Section 22a-208 of the CGS.

B. FACILITY DESCRIPTION

1. The Facility consists of: two (2) combustors and boiler systems, including various supporting ancillary equipment; a turbine generator; an ash residue handling building; and a solid waste receiving building incorporating a storage pit and a tipping floor consisting of various areas for unloading, storage and re-loading activities.

C. OPERATING CONDITIONS

1. 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 otherwise limited by local authorities, the Permittee is authorized to operate as follows: twenty-four (24) hours a day, seven (7) days a week.
2. The Permittee shall receive and process at the Facility: (a) municipal solid waste (MSW); (b) processed construction and demolition (C&D) wood (regulated wood fuel) in accordance with the Department's Bureau of Air Management permits and (c) special waste in accordance with the current Special Waste Disposal Authorization Plan approved by the Commissioner pursuant to Section 22a-208y of the CGS. The Permittee shall not exceed the processing and storage limits established by this Permit. Hazardous and solid wastes, other than those listed herein, shall not be accepted, processed, treated, stored, disposed, or otherwise managed at the Facility without prior written approval of the Commissioner. Any solid waste determined to be unsuitable for incinerations shall be segregated for proper disposal.

3. The Permittee shall limit the Facility's processing capacity as described below, based on the combusted waste having a higher heating design value (HHV) indexed at 5,000 BTU/lb.
 - a. The maximum daily tonnage (TPD) of solid waste combusted at the Facility shall not exceed a total of 689 TPD (344.5 TPD per incinerator or boiler unit), based on twenty four (24) hours per day. The maximum daily tonnage excludes processed C&D wood. As necessary, and/or to demonstrate operational compliance, such amount can be further adjusted based on other related operational parameters (i.e. steam flow rate) specified in the permits issued by the Bureau of Air Management.
 - b. In accordance with Section 22a-213(a) of the CGS and Section 22a-209-5 of the RCSA, all contracts made after July 1, 1971 between the Permittee and any city, town, borough or regional authority to provide for processing, storage and disposal outside of their boundaries of solid waste generated within its boundaries or any such services, shall be submitted for the Commissioner's review. The Permittee shall ensure the cumulative volume of such contract does not exceed the annual combusted throughput specified in condition no. C.3.c.
 - c. The maximum annual solid waste combusted throughput shall not exceed a total of 251,485 TPY of solid waste accounted as received over the scale, subsequently adjusted for storage pit and tipping floor storage inventories and other solid waste amounts not combusted (solid waste unsuitable for incineration, solid waste transferred off-site, etc), and measured on a calendar year basis. The maximum annual solid waste combusted throughput excludes processed C&D wood.
 - d. The processing capacities specified in subparagraphs C.3.a. and C.3.b. above, may be adjusted upward or downward based on the ratio of design HHV equal to 5,000 BTU/lb of solid waste to the measured heating value (BTU/lb) of the incinerated solid waste, as specified in selected sections of the disposal contracts.
 - e. Regulated wood fuel may be combusted up to a maximum of 12,574 tons in accordance with the permits issued by the Bureau of Air Management.
4. On-site management and storage activities shall be in compliance with the following limits and specifications:
 - a. **On-site Storage**

	Cubic Yards	Estimated Tons
MSW [in pit and above tipping floor level on wall shelf]	20,000	4,000
MSW on Tipping Floor (piles; containers* re-loaded for off-site transfer)	2,500	500
Processed C&D wood (chips; piles on the tipping floor)	200	62
Non-ash residues (sorted and stored in containers on the tipping floor)	100	33
Non-ash residue (outdoor in covered container**)	50	17
Incinerated scrap metal fragments (piles and/or containers; ash load-out bldg.)	300	99
Incinerated scrap metal fragments (outdoor in covered containers**)	100	17
Ash residue:		
i.. Ash load-out building (piles; containers)	950	750
ii.. On the tipping floor (in emergency situations; storage up to 72 hours)	5,000	3,750
iii. Outdoor (covered containers**; storage up to 72 hours)	100	75
Total storage:	29,300	9,303

Notes:

- * This amount includes MSW loaded in containers staged on the tipping floor for any regular and emergency off-site transfer. See condition No. C.4.b.v. of this Permit.
- ** Outdoor storage areas for covered containers, in the rear employee parking lot, are identified on the sketch incorporated under condition No. A.1.f. of this Permit.

Estimated densities used to determine tonnage amounts for surety bond calculations: unloaded and/or reloaded MSW, 0.20 ton per cy; ash residue, 0.75 ton per cy; wood chips, 0.31 ton per cy; and non-ash residue or metal, 0.33 ton per cy.

Processed C&D Wood (wood chips) may be received under a Special Waste Disposal Authorization Plan approved separately by the Department.

- b. On-site management and storage activities on the tipping floor shall comply with the requirements of condition C.4.a. above and the following:
 - i. MSW shall be consolidated and/or stored in containers designed to prevent leakage and spillage;
 - ii. All MSW handling and loading activities shall be confined to the tipping floor;
 - iii. All MSW loaded containers shall be staged within the tipping floor and shall be covered before and during off-site transfer;
 - iv. All MSW loading/transfer activities shall occur overnight and be completed prior to 7:00 a.m. or the start of the regular morning waste deliveries, whichever is earlier, in order to mitigate any impact on the daily operations on the tipping floor.
 - v. MSW shall be stored only in the dedicated areas of the tipping floor. All other tipping floor areas, not dedicated for MSW handling and/or storage activities shall be maintained clean of solid waste and used solely for solid waste unloading, loading and truck maneuvering; and
 - vi. The off-site MSW transfer activities shall be limited as follows:
 - A. Daily transfer as part of the regular operation: **1,250 cy per day (250 TPD)**; up to 24 hours for the staging of loaded containers; and
 - B. Emergency transfer during scheduled and/or unscheduled downtime: **2,500 cy per day (500 TPD)**; up to 72 hours for the staging of loaded containers.
- c. On-site management and storage activities of ash residue shall comply with the requirements of Condition No. C.4.a. and the following:
 - i. Ash residue shall be consolidated and stored in: piles in the ash load-out building and/or stored in watertight and sealed containers in the ash load-out building; segregated piles on the tipping floor; and dedicated outdoor areas in watertight and sealed containers;
 - ii. All management and loading activities shall be confined to the ash load-out building and in water tight containers covered containers out of doors. During emergencies limited ash storage activities can occur indoor on the tipping floor, as specified in condition No. C.4.a. of this Permit;
 - iii. All loaded containers shall be: A. staged in dedicated areas within the Facility in the ash load-out building; tipping floor; and dedicated outdoor areas; and B. covered with impervious tarps; and
 - iv. All outdoor staging shall be monitored daily and cleaned of any spilled ash residue.
- 5. a. On or before thirty (30) days from the issuance of this Permit the Permittee shall submit to the Commissioner for review either: i. a contract for the disposal or recycling of all residue, non-ash residue, and bypass waste estimated to be generated at the Facility during the period beginning with December 2012 and ending December 1, 2017 or ii. a plan which demonstrates to the satisfaction of the Commissioner that all residues, non-ash residue, and bypass waste generated at the Facility during such time will be disposed of at a solid waste

- disposal area which the Permittee owns or operates or exclusively controls for purposes of access and allocation of disposal capacity and which has all authorizations required by law to accept such wastes.
- b. On or before three (3) years from the date of issuance of this Permit and in each fifth (5th) year thereafter, the Permittee shall submit for the Commissioner's review either: i. a contract for the disposal or recycling of all residue, non-ash residue, and bypass waste estimated to be generated at the Facility from the end of the period covered by the contract or plan most recently submitted under Condition No. C.5.a. of this Permit through five (5) years after such period; or ii. a plan which demonstrates to the satisfaction of the Commissioner that all residue, non-ash residue, and bypass waste generated at the Facility during such period will be disposed of at a solid waste disposal area which the Permittee owns, operates, or exclusively controls for purposes of access and allocation of disposal capacity and which has all authorizations required by law to accept such wastes.
 - c. The Permittee shall at all times dispose of or recycle all residue, non-ash residue, and bypass waste generated by the Facility in accordance with the most recent contract or plan submitted under Condition No. C.5.a. of this Permit. If at any time the Permittee is unable to dispose of residue, non-ash residue, and/or bypass waste in accordance with said contract or plan, the Permittee shall store such residue, non-ash residue, and/or bypass waste in accordance with a management plan submitted for the Commissioner's review and written approval within sixty (60) days prior to such storage taking place.
6. If at any time during the operation of the Facility, the available capacity for the disposal of ash residue, non-ash residue, and/or bypass waste at a designated permitted solid waste disposal area is less than three (3) years, the Permittee, within forty-five (45) days, shall submit for the Commissioner's review and written approval a plan for uninterrupted disposal of such residue, non-ash residue and bypass waste, including a schedule for the implementation of such plan.
7. 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 in the case of ash residue transported to markets or other solid waste processing or disposal facilities permitted to accept such solid waste.
 - c. Ensure that any unacceptable solid waste inadvertently received, or solid waste which is unsuitable for processing at the Facility is: i. promptly 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.11. of this Permit; and iii. disposed at a facility lawfully authorized to accept such waste. No more than one hundred and fifty (150) cubic yards of unacceptable waste shall be stored on-site unless authorized by the Commissioner.
 - d. 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. be immediately conveyed to the Commissioner using the twenty-four (24) hour emergency response number (860) 424-3338 or the alternate number (860) 424-3333 but 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 (5th) 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. be 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.

- e. Prevent the spillage of solid waste from transfer containers during on-site maneuvering, storage and off-site transport. Each loaded container shall be covered before transportation off-site and the haulers shall be instructed to keep the containers covered during off-site transportation.
- f. 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 and any litter shall be removed on a daily basis.
- g. Have available for review by the Commissioner, the manufacturer's operation and maintenance manuals for each major piece of fixed processing equipment, (which may include, but not be limited to, balers; conveyors; compactors; and storage tanks) installed at the Facility.
- h. Process solid wastes in such a manner that will not cause contamination or degradation of the recyclable product, or any negative impact on the recyclability.
- i. Determined through observation that incoming loads do not contain greater than ten percent (10%) of designated recyclable items.
- j. 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 directly hauled (i.e., truck loads of wastes having already been processed at a permitted facility may be excluded from this requirement) monthly truck loads received. The inspections and supporting documentation shall consist of at a minimum:
 - (i) Photographs of each load inspected;
 - (ii) Origin of each load (municipality; regional facility and whether commercial or residential);
 - (iii) Waste transporter company name;
 - (iv) Estimated percentage of the total designated recyclable items by volume (cardboard, plastic Nos. 1 and 2, glass and metal food containers, leaves, newspaper, office paper, boxboard, magazines, residential high-grade white paper, colored ledger, scrap metal, storage batteries and used oil) and identification of each type;
 - (v) Immediate written notifications to the hauler, municipality in which the waste was

- generated and/or regional facility for each load that contains greater than ten percent (10%) designated recyclable items; and
- (vi) Maintain records of inspections for the life of this Permit or such other timeframe specified in writing by the Commissioner.
8. 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 take proper action in managing such solid waste.
 9. The Permittee shall prominently post and maintain a sign at the Facility entrance pursuant to 22a-209-10(3) of the RCSA that includes the Facility's name and the Department permit number (Permit to Operate No. 11401089-PO) 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.
 10. The Permittee shall:
 - a. control all traffic related to the operation of the Facility in such a way as to mitigate queuing of vehicles off-site and excessive or unsafe traffic impact in the area where the Facility is located;
 - b. unless otherwise exempted, ensure that trucks are not left idling for more than three (3) consecutive minutes pursuant to Section 22a-174-18(b)(3) of the RCSA; and
 - c. prominently post and maintain signs limiting such truck idling time within the Facility (i.e. scale).
 11. The Permittee shall maintain daily records as required by Section 22a-209-10(13) 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:
 - a. Type and quantity of solid waste received at the Facility;
 - b. Origin of received solid waste:
 - i. CT municipality (direct delivery);
 - ii. CT regional facility (consolidating waste from more than one municipality);
 - iii. CT spot-market waste;
 - iv. out-of-state regional facility (where out-of-state spot-market waste was consolidated);
 - v. state for out-of-state spot-market waste directly delivered without passing through a CT facility; and
 - vi. any source of Special Waste authorized to be received;
 - c. Destination, type and quantities of on-site generated solid waste:
 - i. ash residue;
 - ii. pre-combustion sorted waste materials (e.g. scrap metal);
 - iii. post-combustion recovered waste material (e.g. scrap metal); and
 - iv. bypass MSW (e.g. transferred off-site daily, or during emergencies);
 - 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; and
 - e. Gross and net amount of steam and electrical energy produced and sold.

The monthly summaries required pursuant this condition shall be submitted on a quarterly basis, no later than January 31, April 30, July 31, October 31, of each year on forms prescribed by the Commissioner (as may be amended from time to time) 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.

12. 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, appropriate portions of the documents submitted as part of the application and in compliance with the adopted Connecticut State Solid Waste Management Plan.
13. The Permittee shall, no later than sixty (60) days after the effective date of this Permit establish for the Commissioner's benefit an acceptable initial financial assurance instrument and post the financial assurance with the Department in the amount of \$806,782 dollars 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.

The Permittee shall acknowledge and accept 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 instruments shall follow 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: i. Trust Fund; ii. Irrevocable Standby Letter of Credit; iii. Financial Guarantee "Payment" Bond; iv. Performance Bond; and v. Certificate of Insurance. In addition, the following documents are also required to be submitted with the instruments:
 - i. A cover letter signed by the Permittee shall be submitted with an Irrevocable Standby Letter of Credit, in accordance with Section 40 CFR 264.143(d)(4);
 - ii. A "Standby Trust Agreement" shall be submitted with an Irrevocable Standby Letter of Credit; Financial Guarantee "Payment" Bond; or Performance Bond; and
 - iii. A "Certification of Acknowledgement" shall be submitted with a Trust Fund;
- 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 Department's website [www.ct.gov/DEP/financialassurance]; and

- e. The financial assurance instrument shall be adjusted annually for inflation within the sixty (60) days prior to the anniversary date of the 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 RCSA.

14. Compliance Audits

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 unless another frequency is approved in writing by the Commissioner.

- 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 shall 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:

- i. 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
- ii. Certify to the Commissioner that such P.E. or consultant:
 - A. Is not a subsidiary of or affiliated corporation to the Permittee or Permitted Facility;
 - B. Does not own stock in the Permittee or any parent, subsidiary, or affiliated corporation;
 - C. Has no other direct financial stake in the outcome of the compliance audit(s) outlined in this Permit;
 - D. 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; and
 - E. Within ten (10) days after retaining any consultant other than the one originally identified pursuant to this condition, notify the Commissioner in writing of the identity of such other consultant by submitting the information and documentation specified in this condition. Nothing in this condition shall preclude the Commissioner from finding a previously acceptable 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; and

- iii. Include in the compliance audit on-site inspections of the solid waste received at the Facility. The purpose of such inspections is to determine whether loads are being received that contain greater than ten percent (10%) designated recyclable items 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. Describe in detail the Permittee's compliance with this Permit and applicable regulations;
 - v. Identify all violations of this Permit and applicable regulations;
 - vi. Describe the actions taken by the Permittee to correct patterns of loads received that contain greater than ten percent (10%) designated recyclable items;
 - vii. Include findings regarding the inspections conducted in accordance with this condition during the day of the compliance audit;
 - viii. Describe the actions taken by the Permittee to correct the violation(s) identified in each compliance audit; and
 - ix. 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 and P.E. or consultant shall comply with the following:
- i. The inspection frequency shall be quarterly for the remaining life of this Permit;
 - ii. All violations shall immediately be brought to the attention of the Permittee by the consultant. The P.E. or consultant shall also notify the Department within five (5) days of the inspection of all violations noted during the inspection;
 - iii. The Permittee shall correct all violations immediately. Should the Permittee be unable to immediately correct the violation, the Permittee shall submit within seven (7) days of the notification date, 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. Within fifteen (15) days from the inspection date the consultant shall submit, to the Department and the Permittee, the compliance audit report. A copy of the compliance audit report, shall be maintained at the Facility for the life of this Permit or for such other timeframe specified by the Commissioner.
- f. 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 C.14.e.iii above or fails to correct the violations noted by the inspection(s) in accordance with the approved plan and schedule.

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:

Solid Waste Enforcement Section
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.

15. Unless otherwise specified in writing by the Commissioner, any documents required to be submitted under this permit shall be directed to:

Patricia L. Cam
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

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 Saturday, Sunday or a legal state/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 Operate No. 1140636-PO, issued on January 18, 2006, is hereby expired and replaced by this Permit.
22. This Permit shall expire ten (10) years from the date of issuance and may be revoked, suspended, modified, renewed, or transferred in accordance with applicable laws.

Issued on this th 20 day of June, 2013.

By Yvonne Bolton
Yvonne Bolton, Chief
Bureau of Materials Management and
Compliance Assurance

Application No. 200800083
Permit to Operate No. 11401089-PO
Permittee - Certified Mail # E-Certified

ATTACHMENT A
RESPONSE TO COMMENTS
DRAFT RENEWAL PERMIT
APPLICATION NO. 200800083

1 Condition A.2.

Comment accepted with changes. Add "at the Facility" after the word "combustion".

2. Condition C.1.

Comment accepted with changes. Replace condition C.1. with the following "The Permittee is authorized to operate the Facility in accordance with all applicable laws, including this Permit. Unless otherwise approved in writing by the Commissioner or otherwise limited by local authorities, the Permittee is authorized to operate as follows: twenty-four (24) hours a day, seven (7) days a week.

3. Condition C.2.

Comment accepted with changes. Remove the definition of Processed Construction and Demolition wood and replace it with the following: "Processed Construction and Demolition (C&D) Wood" or Regulated Wood Fuel" as defined in Section 22a-209a of the CGS means the wood portion of the construction and demolition waste which has been sorted to remove plastics, plaster, gypsum wallboard, asbestos, asphalt shingles, in Section 22a-209a of the CGS and wood which contains creosote or to which pesticides have been applied or which contains substances defined as hazardous waste under Section 22a-115 of the CGS."

4. Condition C.3.c.

Comment rejected. The Bureau of Air Management's (BAM) permits are regulated by BAM not this Permit.

5. Condition C.3.n.

Comment accepted. In paragraph 4 of condition C.3., "C.3.n." is replaced with "C.3.d.".

6. Condition C.3.n.

Comment rejected.

7. Condition C.3.n.

Comment rejected. Processing capacity is only outlined in conditions C.3.a. and C.3.b. not in C.3.c.

8. Condition C.3.e.

Comment accepted with changes. Add condition C.3.e. "Regulated wood fuel may be combusted up to a maximum annual tonnage of 12,574 tons in accordance with the permits issued by the Bureau of Air Management."

9. Condition C.4.a.

Comment accepted with changes. In condition 4.a. add the word "Estimate" in front of the word "Tons" to describe the last column in the table.

10. Condition C.4.a.

Comment accepted. In condition C.4.a. on line 10 after the word "floor" remove the words "in containers". Storing ash on the tipping floor is allowed only when necessary.

11. Condition C.4.a.

Comment accepted. In line 6, remove "100" and replace with "50" and in line 9 remove "950" to "1,000".

12. Condition C.4.b.iv.

Comment rejected with change. On line 1 after the word "loading" removed the word "and" and replace with "/".

13. Condition C.4.b.vi.A. and C.4.b.vi.B.

Comment rejected.

14. Condition C.4.c.i.

Comment accepted. In condition C.4.c.i., on line 1 after the word "in", add a ":". On line 2 after the word building add the words "segregated piles on the". On Line 3 after the word area, add the words "in watertight and sealed containers".

15 C.4.c.ii.

Comment accepted with changes. On line 1 after the word "building", add the words "in water tight covered containers out of doors".

16 Conditions C.5 and C.6

Comment rejected. In condition C.5., the Department requires that contracts and/or plans be submitted for review from the Permittee to ensure that the disposal or recycling of wastes generated post combustion will be properly disposed or recycled. In addition, condition C.6. ensures that such waste is still under contract to be properly disposed or recycled. The Department has determined that a three (3) and five (5) year update on the contracts should be adequate to ensure compliance. However, should the contracts have a more frequent turnover SECONN may submit to the Department such new contracts as they are entered into. Also, the reports that are received by Department provides information on waste after it has been transferred from the Facility and not prior too.

17. Condition 7.c.

Comment accepted with changes. In line 5 after the word "than", remove the word "thirty (30)" and replace with "one hundred and fifty (150)".

18. Condition 7.c

Comment accepted.

19. Condition 7.h.

Comment rejected. The O&M Plan states on page 4, paragraph 4, line 2; paragraph 5, line 3; and paragraph 7, line 1 that waste is sent for "recycling and/or disposal". This is standard language and does not require you to deviate from the O&M Plan.

20. Condition 7.i.

1. *Comment accepted. Inspections of truck loads delivered to the facility shall be performed for a minimum of five percent (5%) of the directly hauled monthly truck loads received of 32,000 trucks. Therefore, the facility shall conduct at least 160 inspections per month, based on a thirty (30) day month, approximately 5 or 6 inspections per day; not 150 inspections per month and 10 per day as noticed in your comments.*
2. *Comment accepted with changes. In condition 7.j. on line 4, add the word "Connecticut" after "a".*
3. *Comment accepted with changes. In condition 7.j. (iv) on line 1 after the word "of" add the words "the total". And, on line 1, after the word "items" add the words "by volume".*
4. *Comment accepted. Condition 7.i. requires that the percent of designated recyclable items are determined by "observation". If a truck load received at the Facility contains designated recyclable items which are not contaminated or degraded, nor are subject to a negative impact on the recyclability of the designated recyclable items, such items shall be sent to a recycler.*
5. *Comment rejected. All loads inspected by SECONN shall be observed for designated recyclable items at ten percent (10%) and greater not just for "pockets" of designated recyclable items as required in condition C.7.i.*
6. *Comment accepted.*
7. *Comment rejected. Photographs are required for each load inspected. Photos of loads having violations are required to be embedded in the electronic Daily Waste Inspection Log. Non-violation load photos must be maintained in a separate database.*
8. *Comment accepted.*
9. *Comment accepted.*

Additional Type-o's and Corrections

1. *In condition 7.j. (iv), line 4, remove the word "and" after "type;"*.
2. *In condition 7.j. (v), line 3, remove "." after the word "items" and add "; and".*
3. *In condition 7.j. number the second paragraph that begins with the word "Maintain" "(vi)".*

COVANTA SOUTHEASTERN CONNECTICUT COMPANY

FACILITY COMMENTS PERMIT TO OPERATE

Prepared By: Jacob Achey
Covanta Southeastern Connecticut Company
February 13, 2023



Covanta Southeastern Connecticut Company
132 Route 12 (Military Highway)
Preston, CT 06365
Tel: 860-889-4900
Fax: 860-889-5300

February 17, 2023

Ms. Gabrielle Frigon
Waste Engineering and Enforcement Division
Bureau of Material Management and Compliance Assurance
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, Connecticut 06106

Ms. Frigon,

On behalf of Covanta Southeastern Connecticut ("Covanta"), I offer the following comments on the above-referenced draft renewal of the permit to operate the Southeastern Connecticut Company Resource Recovery Facility ("facility").

Condition A.1.

Covanta requests that within the general conditions of this permit that the new expiration date be listed, as well as permit renewal applications should be submitted one hundred and twenty (120) days prior to permit expiration.

Condition C.4.a.

This condition defines weight (tons) limitations in addition to volume (cubic yards) limits on each on-site storage item. Covanta requests that on-site storage have storage limits based on volume only, without tonnage limitations. Weight can vary depending upon density of the material and is based mostly on estimated calculations.



Condition C.4.a.

Covanta requests that the onsite storage table be generalized so that storage limits encompass the entire storage location and not individual storage streams. At any one given time a storage location can contain multiple storage streams, setting an overall volume limit for each storage location with acceptable streams seems most practical. Overall facility storage volume would remain unchanged.

a. On-site Storage	cubic yards
Refuse Pit [Pit and above tipping floor level]	
MSW, Special waste	20,000
Tipping Floor [Piles]	
MSW, Special Waste, Incinerated Scrap Metal, Ash Residue	7,700
Containers on Tipping Floor	
Non-Ash Residue, Incinerated Scrap Metal	100
Containers in Ash Load-Out Building	
Incinerated Scrap Metal, Ash Residue	150
Covered Containers Outside	
Non-Ash Residue, Incinerated Scrap Metal, Ash Residue	250
Ash Load-Out Building [Piles]	
Ash Residue, Incinerated Scrap Metal	1,100
	29,300

Notes:

- *This amount includes MSW loaded in containers staged on the tipping floor for any regular and emergency off-site transfer.
- *Outdoor storage areas for covered containers, in the rear employee parking lot.
- * Ash Residue tipping floor storage limited to emergency situations up to 72 hours
- * Ash Residue Outdoor container storage limited up to 72 hours



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Condition C.7.d.

This condition states that, “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” Covanta requests that Covanta requests that facsimile be changed to a current Solid Waste program Waste Engineering and Enforcement Division Email Address.

Condition C.7.j.vi.

Covanta requests that record of inspections be kept for a minimum of 3 years. As inspections are verified during Compliance Audits to show compliance with condition C.7.j. Additionally, totals & failed loads are sent in a report to the Commissioner.

Condition C.14.b.

Covanta requests that P.E compliance audits be reduced from Quarterly to Semi-annually.

Condition 14.c.iii.

Covanta requests that this be changed to the following “Unless otherwise approved by the Commissioner, the compliance auditor shall inspect solid wastes unloaded from a minimum of ten (10) direct hauled loads or the number of direct hauled loads for a four (4) hour inspection period, whichever comes first.”

Covanta’s reasoning behind this change is at the time of this renewal Covanta SECONN predominately receives loads from transfer stations, with the number of direct hauls having decreased significantly, sometimes making the minimum of 10 loads inspected difficult to meet in a reasonable amount of time. It should also be noted that inspections direct hauled loads are not specifically mentioned in the original condition, but was assumed, as facility inspections are to be conducted on direct hauls.