General Permit to Construct and Operate a Commercial Facility for the Management of Recyclable Materials and Certain Solid Wastes ("Commercial GP")

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Commercial GP - Purpose and Scope

Purpose:
• Need for a GP to address existing small businesses and ensure compliance
• Provide opportunities for the development of new small businesses
• Promote the goals of the state-wide Solid Waste Management Plan

Scope:
• The GP provides authority to manage over 35 different recyclables and solid wastes
• Also provides expanded processing options for materials
Commercial GP - Structure

Two primary parts:

1. Commercial GP – Sections 1 through 8
   - Administrative content including registration requirements and registrant obligations

2. Appendices A through G
   - Facility categories’ O&M plans addressing:
     - A - Asbestos Containing Material (ACM)
     - B - Ash Residue
     - C - Clean wood (including leaves and grass clippings)
     - D - Construction and Demolition (C&D) Waste
     - E - Non-RCRA Hazardous Waste and Compatible Solid Wastes
     - F - Recyclables
     - G - Universal Waste and Compatible Solid Wastes
Commercial GP – GP Content

General Permit - Sections 1 through 8 provide:

• Authority to issue
• Definitions
• Authorization for conducting regulated activities
• Registration requirements (next slide)
• General conditions
• Commissioner’s powers
Commercial GP – GP Content (ctd.)

• Registration Requirements
  ➢ Submittal
  ➢ Financial Assurance
  ➢ Geographical setting
  ➢ Environmental Justice (EJ) Program
  ➢ Tiers I, II and III for Clean Wood and C&D Waste
  ➢ Tier I for Mixed Battery Collection
Commercial GP - Appendices

• May choose up to 5 facility categories to be authorized at any one facility

• Addresses the management of additional wastes types within different appendices:
  - ACM
  - C&D
  - Ash Residue
  - Asphalt Roofing Shingles
  - Capacitors and Fluorescent Light Ballasts
  - Furniture for reuse and recycling Wallboard
  - Propane Tanks with and without valves
  - Shoes
  - Treated Wood
  - Yellow Grease
  - Oversized MSW
  - Carpets
  - Gypsum
Commercial GP - Appendices Contents

- **ACM** – Consolidation and transfer of containers of ACM
- **ASH RESIDUE** – Consolidation and transfer of containers of Ash Residue
- **CLEAN WOOD** (leaves and grass clippings) – outdoor processing allowed, setbacks
- **C&D WASTE** – indoor processing, recovery of recyclable items
- **NON-RCRA HW AND COMPATIBLE SW** – limited processing, consolidation and transfer
- **RECYCLABLES** – limited processing, consolidation and transfer
- **UNIVERSAL WASTE AND COMPATIBLE SW** – consolidation and transfer of Universal Waste; used electronics disassembly; provision for town designated collection location for CEDs
Commercial GP – Appendices Contents

• Part I – General Operating Conditions
  ➢ Facility Design
  ➢ Other Required Authorizations
  ➢ General Operating Conditions

• Part II – Capacity Limits and Management Requirements
  ➢ Capacity limits for receipt and storage
  ➢ Material specific management conditions
Commercial GP - Benefits

- Short review process
- No O&M plan development, but P.E. certified site plan remains a requirement
- Evens the playing field – same management requirements for all registrants and operators
- Variety of materials can be managed at one facility
- Small business growth while applying for individual SWF permit
- Counterpart permit to the MTS GP
Commercial GP - Examples

• Current Recycling GP Registrant – Single Item for Clean Wood
  ➢ No Change to operations
  ➢ Register under the Commercial GP Appendix C Tier III
  ➢ Fee = $500

• New Registrant who wants to process recyclables and Tier III C&D Waste
  ➢ Register under Commercial GP Appendices F and D
  ➢ Fee = $1750 (Recyclables Fee $500 + C&D Fee $1250)
Commercial GP - Examples

- Current DUE GP Registrant
  - No change to operations
  - No action necessary, continue under the DUE GP
  OR
  - Receipt and processing of hard drives recovered elsewhere
  - Baling of materials derived from the disassembly of UE
  - Register under the Commercial GP Appendix G
  - Fee = $1250
Commercial GP – Current Recycling GP Registrants

- Expiring registrations - Register under the new Commercial GP or apply for an individual permit
- Continue operations in accordance with current Recycling GP and their approvals during interim
- Notice of Issuance may contain additional provisions for operations until new approvals are issued under Commercial GP
Commercial GP - Schedule for Issuance

- Published Notice of Intent to Issue on July 23, 2015
- 30 day public comment period for formal written comments ends August 24, 2015
- Department to develop registration form and instructions
- Compile and consider written comments received, amend Commercial GP as appropriate
- Route for issuance
- Publish Notice of Issuance (will include instructions for existing registrants of the CRF GP)
- Applicants will be required to apply within window of time
- Forms to be available on-line

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Questions?

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