

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



April 7, 2011

RECEIVED

APR 12 2011

Mr. Peter W. Egan
Director of Environmental Services
Connecticut Resources Recovery Authority
100 Constitution Plaza
Hartford, CT 06266

CRRA
ENVIRONMENTAL

Re: Mid - CT Resource Recovery Facility located on Reserve Road, Hartford, CT.
Application No. 200401531 submitted by Connecticut Resources Recovery Authority (CRRA) for
renewal of the existing Permit to Operate.

Dear Mr. Egan:

Please find the enclosed a certified copy of your permit to operate issued by the Department for the solid waste facility specified above.

In December of 2006, the Department amended the State Solid Waste Management Plan (the Plan), and in doing so set forth aggressive goals to reduce generation of solid waste and to significantly increase recycling rates. As the permittee of a solid waste facility, you play a critical role in the successful implementation of the Plan. The Department expects you to be familiar with the Plan and to help carry-out the vision of the Plan by increasing the awareness of and educating your clients regarding long-standing state recycling requirements such as those found in sections 22a-220a(f) and 22a-241b of the Connecticut General Statutes. The following are direct links to the Plan and a fact sheet entitled *Recycling Reminder*. Please feel free to redistribute these links and documents.

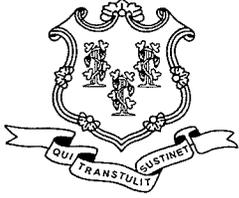
http://www.ct.gov/dep/cwp/view.asp?a=2718&q=325482&depNav_GID=1639
<http://www.ct.gov/dep/cwp/view.asp?A=2714&Q=324896>

If you have any questions concerning your permit, please contact Calin Tanovici of the Waste Engineering and Enforcement Division at 860-424-3315.

Sincerely,

Gabrielle Frigon
Supervising Environmental Analyst
Waste Engineering and Enforcement Division
Bureau of Materials Management and Compliance Assurance

GF:ct
Encl:1



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



PERMIT TO OPERATE

PERMITTEE: Connecticut Resources Recovery Authority
FACILITY ADDRESS: Reserve Road, Hartford, Connecticut
PERMIT No.: 06401021 - 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 Environmental Protection ("Commissioner") to the Connecticut Resources Recovery Authority ("CRRA"; "Permittee") to operate the Mid-Connecticut Resources Recovery Facility ("Facility"; "RRF") located on Reserve Road, Hartford, Connecticut.

This permit supersedes the Permit to Operate No. 0640353-PO issued on 9/10/99.

A. TERMS AND CONDITIONS

1. This Permit is based on all documents and specifications submitted as part of Application No. 200401531 (permit renewal), including, but not limited to, the following documents incorporated herein by reference:
 - a. Application form dated May 11, 2004.
 - b. Two (2) binders dated May 2004, prepared by M.I. Holzman & Associates and titled: (i) Application for Permit Renewal; and (ii) Operation and Management Plan (O&MP) and Environmental Compliance Operating Manual, incorporating various documents, not limited to the following:
 - O&MP (dated May 1994; revised September 2003).
 - Permitting, Disposal and Billing Procedures (dated March 1, 2007).
 - A set of three (3) drawings, all P.E. certified, prepared by TRC, titled "Facility Utility Site Plan" (SP-1; SP-2 and SP-3), prepared by TRC, all dated February 13, 2004.
 - A set of four (4) drawings, all P.E. certified, prepared by HRP Associates, Inc., titled "Property of CL&P to be Conveyed to CRRA" (3 drawings) and "Property to be Retained by CL&P (Parcel 3)", all dated December 15, 2000.
 - Attachment L (dated May 11, 2004) certifying previously submitted documents and permitted activities related with the existing RRF.
 - c. A letter from CRRA dated November 2, 2009 with an attached binder with copies of current CRRA's disposal arrangements for: (i) ash residue (with Wheelabrator Technologies, Inc.); and (ii) non-ash residue and bypass MSW (with Waste Management of Massachusetts, Inc.).
 - d. Notification letter dated May 26, 2004 from CRRA (re: installation of a dolomitic lime silo and distribution system for ash treatment), accompanied by a set of two (2) related drawings prepared by AAES Engineering, Inc.
 - e. Approval letter dated June 23, 2008 issued by the Department [re: letter dated June 2, 2008 from CRRA accompanied by a set of 30 drawings prepared by URS Corporation AES), all describing various improvements to the ash handling building and installation of a new truck scale.

- f. Approval letter dated August 28, 2008 issued by the Department [re: letter dated July 3, 2008 from CRRA (accompanied by a June 27, 2008 "technical memo" from Malcom Pirnie, Inc. and a Site Plan drawing), all describing the installation and use of a new mobile shredder to grind sorted waste (furniture; sofas; mattresses; rugs) not suitable for processing at the waste Processing Facility (WPF), but for direct combustion at the Power Block Facility (PBF).
- g. Notification letter dated December 30, 2008 from CRRA (re: start of shredding activities on the tipping floor) accompanied by two (2) attachments prepared by Malcom Pirnie, Inc: letter dated December 29, 2008; a P.E. certified drawing dated 10/2008, titled "Mobile Operational and Storage Location Alternatives".
- h. A letter dated October 6, 2010 received from CRRA on October 7, 2010 (describing various operational clarifications) accompanied by various attachments:
 - A copy of a CRRA / CL&P Deed document dated April 8, 2009 with six (6) attachments, including a drawing titled "Map Showing Property (Parcel 3) to be Acquired by CRRA and Reserved Easements Retained by CL&P, Co.", dated December 4, 2007, prepared by HRP Associates, Inc.
 - A document titled "Procedure for Transfer of MSW at the WPF.
 - A document prepared by CRRA identifying est. indoor storage volume for ash residue.
 - A set of 30 copies of various as-built drawings for the Facility, prepared and certified by URS Corp. and received October 7, 2010.
- i. A letter dated March 16, 2011 from CRRA clarifying indoor sorting and storage activities for white goods removed from the incoming waste stream.

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.

"Acceptable MSW" (or "AMSW") means solid waste received at the facility, as defined in the "Mid-CT Project Permitting, Disposal and Billing Procedures" document identified in condition No. A.1.b. of this permit.

"Bypass Waste" means "by-pass waste" as defined in the "Mid-CT Project Permitting, Disposal and Billing Procedures" document incorporated herein by reference.

"Clean wood" means 'clean wood' as defined in RCSA Section 22a-208a-1 and is defined therein as wood derived from such products or processes as pallets, skids, spools, packaging materials, bulky wood waste (brush; landclearing debris), or scrap from newly built wood products, provided such wood is not treated wood as defined in CGS Section 22a-209a, or demolition wood.

"Commissioner" means the Commissioner of the Department of Environmental Protection or the Commissioner's designee.

"Day" means calendar day.

"Department" means the Department of Environmental Protection.

“Designated recyclable item” means 'designated recyclable item' as defined in CGS section 22a-207(27).

"Municipal Solid Waste" (or "MSW") means 'municipal solid waste' as defined in CGS Section 22a-207.

“Non-Ash Residue” means any solid waste received at the Facility, but determined by the Permittee to be unsuitable for processing by the WPF equipment system designed to generate refuse derived fuel (RDF), or for combustion by the PBF equipment (for steam and energy generation), and which must be sorted, separated, consolidated, transferred off -site and disposed by means other than combustion.

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

“Power Block Facility” (or “PBF”) means the portion of the Facility where refuse derived fuel (RDF), coal, a mixture of RDF and coal, or other fuels are combusted, and in which steam generated by the combustion process is used to produce electrical energy.

“Processing” means the practice by which either the physical characteristics or volume of the solid waste accepted at the Facility is being altered through the conversion into RDF, and subsequent combustion process.

"Recyclables" means the types of solid waste mandated to be recycled, as defined in RCSA Section 22a-241-2(1).

“Refuse Derived Fuel” (or “RDF”) means a type of municipal solid waste (MSW) produced by sorting received MSW by size and type and/or reducing the volume of MSW through mechanical means.

“Treated Wood” means 'treated wood' as defined in CGS Section 22a-209a(a)(2).

“Waste Processing Facility” (or “WPF”) means the portion of the Facility where MSW is received, non-ash residue is generated, RDF is produced and stored for use as fuel in the PBF combustion equipment.

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 CGS Sections 22a-6, 22a-208, 22a-225 and 22a-226.
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 solid waste 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, unless otherwise specified 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/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/operational upgrades, improvements and/or minor changes: (a) are deemed necessary for a better and more efficient operation of the Facility; (b) do not significantly change the nature of the Facility, or its impact on the environment; and (c) do not warrant the issuance of a permit or authorization pursuant to CGS Section 22a-208a.

B. FACILITY DESCRIPTION

The existing RRF incorporates: (a) a truck scale / scale house system and administrative offices; (b) an unloading dock, conveyor system and storage area for coal; (c) a "waste processing facility" (WPF) incorporating various indoor tipping floor (TF) areas for related operational activities [maneuvering and staging of trucks and heavy equipment; receiving and unloading; storage; sorting; shredding of oversized bulky material; waste reloading for off-site transfer; processing through two (2) mechanical processing line systems designed to generate refuse derived fuel (RDF); storage of RDF]; (d) a "power block facility" (PBF) incorporating three (3) combustion/boiler systems (including related ancillary equipment) designed to combust RDF at a specific BTU/lb design higher heating value (HHV) and generate steam, ash residue and electrical energy; and (e) an ash handling building.

C. AUTHORIZATION TO OPERATE

1. The Permittee shall accept at the Facility only Acceptable MSW (AMSW) suitable for on-site processing. Hazardous waste shall not be accepted, processed, disposed of or stored at the Facility. Any waste determined as unsuitable for incineration shall be separated for proper disposal.
2. The Permittee shall operate the Facility in compliance with the permitted limits, adjustments and specifications as summarized in the following sections a., b., and c. of this condition:

a. Power Block Facility (PBF)

Equipment:	Three (3) combustor/boiler systems designed to combust 100% RDF, or a mixture of RDF + coal
Processing (AMSW to RDF):	24 hours/day; 365 days/year operation
Processing Capacity:	739,855 TPY of RDF 2,027 tons/day (TPD) of RDF (design HHV = 5,785 BTU/lb (both amounts are subject to the adjustments specified below under conditions No. C.2.a.iii.)

- i. The Permittee shall ensure that the PBF is operated in continuous compliance with the conditions specified in any valid permit(s) issued by the Bureau of Air Management ("Air Permits").
- ii. If any condition or specification in this permit conflicts with any condition or specification contained in the Air Permits, the condition or specification from the Air Permits shall control.

- iii. As provided by the Air Permits, the actual amount of RDF combusted in the PBF is variable and, when calculated, shall be adjusted upward or downward based on:
- The ratio of the design HHV of RDF (BTU/lb) to the actual HHV (BTU/lb) of the combusted RDF, and
 - The actual amount, if any, of coal or any other type of fuel approved in writing by the Commissioner and actually combusted by the PBF equipment.

b. Waste Processing Facility (WPF)

Receiving of AMSW:	Monday - Saturday (5:00 am - 5:00 pm)
Processing:	Max. 192 hours/week/2 lines (excludes downtime) Monday - Saturday (7:30 am - 2:30 am)
Equipment:	Shredder on TF; two (2) processing lines
Equipment Max. Processing Capacity (*):	988,000 TPY (19,000 TPW - any single week) (3,700 TPD - any single day)
Permitted Processing Capacity (**):	888,888 TPY (based on 2,849 TPD average and 312 days/year operation; subject to adjustment specified under note No. C.2.b.ii.)
Guaranteed Processing Capacity(***):	765,000 TPY (guaranteed by the original equipment vendor; contractual limit under long-term contracts per CGS 22a-213; not subject to any type of allowed adjustment)

- i. The WPF processing capacity limit (**) corresponds to, and is based on: (a) the PBF combustion limitations for RDF (condition No. C.2.a.iii.); and (b) the RDF/AMSW design weight ratio = 83% (pages No. 12, 21 and 60 of O&MP listed in condition No. A.1.b.).
- ii. Due to the variability of the RDF amount combusted in the PBF, the actual AMSW amount processed in the WPF is subsequently variable and, when calculated, shall be adjusted upward or downward, based on:
- The ratio of the design HHV of RDF (BTU/lb) to the actual HHV value of the combusted RDF (BTU/lb), and
 - The actual amount, if any, of coal or any other type of fuel approved in writing by the Commissioner and combusted in the PBF, and
 - The actual weight ratio of the generated RDF to the AMSW amount processed by WPF.

The allowed adjustment applies to the WPF's permitted processing capacity (**) limits, but it does not allow the Permittee to exceed the maximum physical processing capacity (*) limits of the WPF's equipment.

- iii. In accordance with CGS Section 22a-213(a) and RCSA Section 22a-209-5, all contracts made between the Permittee and any city, town, borough or regional authority to provide for collection, transportation, processing, storage and disposal outside of their boundaries of solid waste generated within their boundaries, or any of such services, shall be submitted for Commissioner's review pursuant to CGS Section 22a-213(b). The Commissioner shall not approve long-term contracts which in total exceed the (***) guaranteed processing capacity specified above.

c. On-Site Storage Limits and Handling Specifications.

Type of Waste	cy	Storage Specifications & Comments
AMSW (received @ WPF)	20,790	piles & containers; notes (*)^(^)
RDF (generated/received @ WPF)	21,670	piles; containers; bales (20 cy); note (^)
Sub-total	42,460	note (^); up to 10,000 cy may be clean wood (loose; chips) sorted & stored @ WPF
NON-ASH RESIDUE		
• Non-processible waste	1,500	storage in piles & containers located on indoor areas; sorted on TF from received MSW; may be suitable for indoor shredding; up to 700 cy may be sorted scrap metal & white goods
• Process residue (front-end)	2,400	piles & containers; mechanically sorted by the WPF's processing lines; up to 1,500 cy may be stored on TF
ASH RESIDUE (@ ash bldg.)	3,167	piles & containers; up to 160 cy may be post-combustion scrap metal (to be magnetically separated in the future for recycling)
Total	49,527	

Notes:

- Other storage: coal (80,000 tons /outdoor lined area; pebble lime (160 ton / silo); dolomitic lime (110 tons in silo)
- (*) Amount include MSW reloaded for off-site transfer (see limits noted under condition C.2.c.i.).
- (^) Variable "up to" amounts. MSW + RDF + clean wood shall not exceed 42,460 cy.

On-site waste handling and storage activities shall be confined to the following buildings and comply with the limits and specifications noted as part of this permit:

i. WPF Building.

As designed, indoor areas shall be used for:

- Receiving and unloading of AMSW on the TF area;
- Maneuvering and staging of heavy equipment, trucks and containers;
- Fully reloaded containers shall be shipped off-site within 48 hours;
- Handling of non-processible waste (deemed unsuitable to be processed into RDF). Such waste is sorted on the TF from the received AMSW, stored, shredded (as needed), consolidated and loaded in containers (for off-site transfer), and includes, but is not limited to: bulky items, oversized MSW (furniture; mattresses; rugs) and scrap metal, including appliances containing CFC liquid;
- Conveying AMSW to the WPF's two (2) mechanical processing line systems;
- Generating, storing and conveying RDF to the PBF section of the facility;
- Handling of process residue (front-end). Such waste is generated from AMSW by the WPF's two (2) mechanical processing line systems, stored, consolidated and loaded in containers for off-site transfer) and includes, but is not limited to fines and scrap metal fragments;
- Handling of RDF. Such byproduct (generated on-site from AMSW and/or received from other sources) is separately stored indoor (piles; bales) and conveyed to the PBF for use as fuel for further combustion; and
- Handling of received AMSW for off-site transfer. Reloading in containers shall comply with the following limits and operational specifications:
 - Maximum off-site transfer: up to 680 tons/day (3,400 cy/day)
 - On-site storage of loaded containers: ≤24 hours
 - Reloading activities: Monday - Saturday (11:00 pm - 4:45 am);

Sunday (all day, if WPF is not processing)

ii. Ash Residue Building.

Handling of ash residue, including post-combustion scrap metal fragments shall be confined to the dedicated ash residue building. Storage can occur in piles and/or containers loaded for off-site shipments. Such containers shall be well-maintained, leak-proof, and covered with an impervious tarp before off-site transfer to a permitted disposal site. Fully loaded containers shall be shipped off-site within 48 hours.

3. The Permittee shall, pursuant to CGS Section 22a-.208g, ensure compliance with the following requirements:
 - a. On or before 6/30/11 the Permittee shall submit to the Commissioner for review either: (1) a contract for the disposal or recycling of all ash residue, non-ash residue, and bypass solid waste estimated to be generated at the Facility during the 6/2010 - 6/2015 period; or (2) a plan which demonstrates to the satisfaction of the Commissioner that all ash residue, non-ash residue, and bypass waste generated at the Facility during the 6/2010 - 6/2015 period 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 6/30/2014 and in each fifth year thereafter (2019, 2024; etc.) the Permittee shall submit to the Commissioner for review either: (1) a contract for the disposal or recycling of all ash 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 approved by the Commissioner under condition No. C.3.a. of this permit through five (5) years after such period, or (2) a plan which demonstrates to the satisfaction of the Commissioner that all ash 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 ash residue, non-ash residue, and bypass waste generated by the Facility in accordance with the most recently submitted contract or plan submitted under condition No. C.3.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 ash residue, non-ash residue, and bypass waste in accordance with a management plan approved in writing by the Commissioner no less than sixty (60) days before such storage first takes place; and
 - d. If at any time during operation of the Facility, the available capacity for the disposal of ash residue, non-ash residue, and by-pass waste at a designated permitted solid waste disposal area is less than three (3) years, the Permittee shall within 45 days, submit a plan for the Commissioner's review and written approval for uninterrupted future disposal of such residue, non-ash residue and bypass waste, including a schedule for implementing said plan.
4. 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;

- 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 in the daily log and reported in the quarterly report required by this permit; and (iii) disposed at a facility lawfully authorized to accept such waste. A spare container shall be available for any storage emergency;
- d. Ensure that contingent storage of incidental mixed batteries, mercury-containing lamps, used electronics, thermometers and thermostats classified as universal wastes that is inadvertently delivered to the Facility as part of a load is conducted in accordance with the requirements of the Universal Waste Management Regulations (RCSA Sections 22a-449(c)-113 and 22a-209-17). The storage container(s) shall be located in an area of the Facility that will not interfere with other permitted activities;
- e. Provide expeditious notification regarding any emergency incident (explosion, accident, fire, release, or other significant disruptive occurrence) which: (i) significantly damaged equipment or structures; (ii) interrupts the operation of the Facility for greater than twenty-four (24) hours; (iii) results in an unscheduled Facility shutdown or forced diversion of solid waste to other solid waste facilities; (iv) could reasonably create a source of pollution to the waters of the state; or (v) otherwise threatens public health.

Such notification shall be: (i) immediately conveyed to the Commissioner using the 24-hour emergency response number (860) 424-3338 or the alternate number (860) 424-3333 and in no event later than twenty-four (24) hours after the emergency incident; (ii) verified to the Solid Waste Program in the Waste Engineering and Enforcement Division of the Bureau of Materials Management and Compliance Assurance by phone at (860) 424-3366, or at another current publicly published number for the Solid Waste Program, or by facsimile at (860) 424-4059; (iii) followed by a written report no later than the fifth business day after the emergency incident detailing the cause and effect of the incident, remedial steps taken and emergency backup used or proposed to be implemented; and (iv) recorded in a log of emergency incidents. In addition to the notification requirements above, the Permittee shall comply with all other applicable reporting or notification requirements regarding the emergency incident including but not limited to, reporting required by CGS Section 22a-450.

- f. 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;
- g. Operate the Facility in a safe manner and control fire, odor, noise, spills, vectors, litter and dust emission levels in continuous compliance with all applicable requirements, including OSHA. The Facility's premises shall be maintained and any litter shall be removed on a daily basis;
- h. Have available for review by the Commissioner, the manufacturer's operation and maintenance manuals for each major piece of fixed processing equipment (including, but not limited to, balers; conveyors; compactors; and storage tanks) installed at the Facility;
- i. Process wastes in such a manner that will not cause contamination or degradation of the recyclable product, or any negative impact on the recyclability;
- j. Conduct periodic unannounced inspections of truck loads delivered to the Facility, pursuant to CGS Section 22a-220c(b). The inspections shall be performed for a minimum of five percent (5%) of the monthly truck loads received. The inspections and supporting documentation shall consist of at a minimum:

- j. Conduct periodic unannounced inspections of truck loads delivered to the Facility, pursuant to CGS Section 22a-220c(b). The inspections shall be performed for a minimum of five percent (5%) of the 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 designated recyclable items (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; and
 - (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 10% designated recyclable items;
 - k. Determine through observation that incoming loads do not contain >10% of designated recyclable items;
 - l. Maintain records of inspections for the life of the permit or such other timeframe specified in writing by the Commissioner; and
 - m. Ensure compliance with the following ash residue related issues:
 - Best management practices are continuously used for on-site handling of ash residue generated at the Facility;
 - Ash residue characterization tests are done annually for the term of this permit in accordance with the EPA protocol titled "Guidance for the Sampling & Analysis of Municipal Waste Combustion Ash for Toxicity Characteristic" dated June 1995;
 - The annual ash characterization test results are kept on site available for review by the Commissioner; and
 - Within thirty (30) days of receiving any annual ash characterization test results that exceed limits established by the Environmental Protection Agency (EPA), the Permittee shall submit for the Commissioner's review and written approval a plan to address such exceedences. The Permittee shall ensure that any such plan is developed by a professional engineer licensed in the State of Connecticut. The Permittee shall implement the plan as approved by the Commissioner. In approving any such plan, the Commissioner may approve the plan with such conditions or modifications as the Commissioner deems necessary.
5. The Permittee shall have an operator, certified pursuant to RCSA Section 22a-209-6, present at all times during Facility operation. All individuals under the supervision of such certified operator shall have sufficient training to identify waste received at the Facility which is not permitted to be received, or is unsuitable for processing, and take proper action in handling such waste.
 6. The Permittee shall prominently post and maintain a sign at the Facility entrance pursuant to RCSA Section 22a-209-10(3) that includes the Facility's DEP permit number and issuance date.
 7. 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 RCSA Section 22a-174-18(b)(3); (c) prominently post and maintain signs limiting such truck idling time within the Facility (e.g. at the scale; unloading areas on TF, etc).

8. The Permittee shall maintain daily records as required by RCSA Section 22a-209-10(13) as well as CGS Sections 22a-208e and 22a-220. Based on such records, the Permittee shall prepare monthly summaries including, but not limited to, the following information as it pertains to solid waste:
- a. Type and quantity of solid waste received at the Facility;
 - b. Origin of received solid waste: (i) CT municipality (direct delivery); (ii) CT regional facility (consolidating waste from more than 1 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); (vi) any source of Special Waste as defined in RCSA Section 22a-209-1 authorized to be received;
 - c. Destination, type and quantities of on-site generated solid waste: (i) ash residue; (ii) pre-combustion sorted waste materials (scrap metal; etc.); and (iii) post-combustion recovered waste material (scrap metal; etc.); (iv) bypassed MSW (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 quarterly 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 Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127.

9. 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 the documents submitted as part of the application and in accordance with the adopted Connecticut State Solid Waste Management Plan.
10. The Permittee shall, no later than ninety (90) days from the issuance date of this permit perform bi-annual compliance audits for the life of this permit, or based on another schedule submitted to, and approved 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 RCSA Sections 22a-209-1 through 22a-209-17 and with the terms and conditions of this permit.
 - b. Compliance Auditor. The compliance audits required by this condition shall be performed by an engineer licensed to practice in Connecticut ("P.E."), or consultant. Such P.E. or consultant shall be approved in writing by the Commissioner and will be required to prepare and submit to the Commissioner quarterly compliance audit reports.

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

- i. Is not a subsidiary of or affiliated corporation to the Permittee or Permitted Facility;
- ii. Does not own stock in the Permittee or any parent, subsidiary, or affiliated corporation;

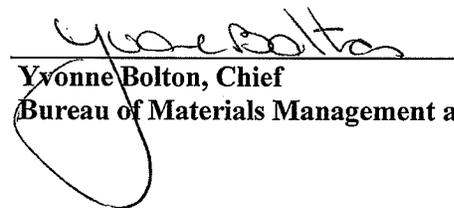
- iii. Has no other direct financial stake in the outcome of the compliance audit(s) outlined in this permit;
 - iv. Has expertise and competence in environmental auditing and the regulatory programs being addressed through this permit, including evaluation of compliance with requirements specified in RCSA Sections 22a-209-1 through 22a-209-17 and with the terms and conditions of this permit; and
 - v. 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 RCSA Sections 22a-209-1 through 22a-209-17.
 - ii. Describe any outreach efforts conducted by the Permittee to initiate Pay-As-You-Trow (PAYT) programs also known as unit based pricing or variable-rate pricing and shall include names of waste haulers and municipalities that are participating in such programs.
 - iii. The compliance auditor shall include in the compliance audit on-site inspections of the waste received at the Facility. The purpose of such inspections is to determine whether loads are being received that contain > 10% designated recyclable items and to detect patterns associated with such loads. Unless otherwise approved by the Commissioner, the compliance auditor shall inspect wastes unloaded from a minimum of 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. A description of the Permittee's compliance with this permit and applicable regulations;
 - v. Identification of all violations of this permit and applicable regulations;
 - vi. A description of the actions taken by the Permittee to correct patterns of loads received that contain > 10% designated recyclable items;
 - vii. Findings regarding the inspections conducted in accordance with this condition during the day of the compliance audit.
 - viii. A description of 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 the consultant shall comply with the following:
- i. The inspection frequency shall be bi-annually for the life of the permit;

- ii. All violations shall immediately be brought to the attention of the Permittee by the consultant. The 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 thirty (30) 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 the 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 this condition 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 bi-annually no later than January 31 and July 31 directly to the Solid Waste Enforcement Section, Waste Engineering and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127.
11. Unless otherwise specified in writing by the Commissioner, all documents required to be submitted under this permit shall be directed to Calin Tanovici, Waste Engineering and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127. As necessary, such documents will be routed to the appropriate staff for review.
12. 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 or federal holiday shall be submitted or performed by the next business day thereafter.
13. 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 RCSA Section 22a-430-3(b)(2), 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 CGS Section 22a-6, pursuant to CGS Section 53a-157, and in accordance with any other applicable statute.

14. 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.
15. 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.
16. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local laws.
17. Permit to Operate No. 0640353-PO issued on September 10, 1999 is no longer in effect and is replaced by this permit.
18. This permit shall expire five (5) years from the issuance date of this permit and may be revoked, suspended, modified, renewed, or transferred in accordance with applicable laws.

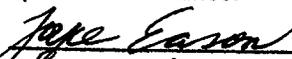
Issued on this 6th day of April, 2011.

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

Permit to Operate No. 06401021 - PO

Administrative Note
Application No. 200401531 for PO renewal
Permittee - Certified Mail # ..E-Certified...

Certified to be a true copy of a document in the file of the Department of Environmental Protection, Bureau of Materials Management and Compliance Assurance.

Name: 
Title: Secretary II
Date: April 7, 2011

 ORIGINAL