



REQUEST FOR ADDITIONAL INFORMATION

October 14, 2022

Mr. Peter W. Egan
Materials Innovation and Recycling Authority
200 Corporate Place, Suite 202
Rocky Hill, CT 06067

Subject: Closure Plan, Materials Innovation and Recycling Authority, Connecticut Solid Waste System ("CSWS") Resource Recovery Facility, 100 Reserve Road and 300 Maxim Road, Hartford, Connecticut

Dear Mr. Egan:

Staff of the Bureau of Materials Management and Compliance Assurance (i.e., Engineering and Enforcement Division, Permitting and Enforcement Division, and Emergency Response and Spill Division); the Bureau of Water Protection and Land Reuse (i.e., Remediation Division); and the Bureau of Air Management (i.e., Radiation Division) within the Department of Energy and Environmental Protection (the "Department") have completed a technical review of the proposed closure plan dated May 2022 prepared by TRC Environmental Corporation (TRC), which was received by the Department on May 23, 2022.

The Materials Innovation and Recycling Authority ("MIRA") submitted the closure plan pursuant to §22a-209-13 of the Regulations of Connecticut State Agencies (RCSA) for the closure of the CSWS Resources Recovery Facility ("RRF") located at 100 Reserve Road and 300 Maxim Road, Hartford, Connecticut ("Site"). MIRA shall ensure that all areas of the Site will be closed in a manner that is protective of human health and the environment of the State of Connecticut, in accordance with §22a-208 of the Connecticut General Statutes (CGS) and §22a-209-13 of the RCSA.

To allow Department staff to continue the technical review of the closure plan, please update and/or submit the information as indicated in the review comments listed below:

Bureau of Materials Management and Compliance Assurance (MMCA)

Waste Engineering and Enforcement Division (WEED) comments:

1. Section 1.1 Facility Description - Figure 2 is difficult to review due to its size (i.e., 11-inch x17-inch) and the stipple pattern that identifies the solid waste permit area obscures basic information. *MIRA shall provide a full-size (i.e., 24-inch x 36-inch) drawing(s) affixed with the stamp/live signature prepared by an engineer (P.E.) licensed to practice in the State of Connecticut or a licensed surveyor (LS) licensed by the State of Connecticut that depicts all closure elements clearly identified and labeled.*
2. Section 2 Permits and Regulatory Considerations
 - a. RCRA Less Than 90 Day Storage (Sec. 2.8) – *MIRA shall provide a written summary specifying the actions (e.g., inventory of constituents of concern; types of waste; site plan*

depicting sampling locations, number, methodology, analytical parameters; confirmation sampling; verification of clean; etc.) that MIRA or its contractor will perform to ensure the closure of this area is conducted in accordance with the regulations and the Department's guidance document pertaining to less than 90-day hazardous waste storage.

- b. Environmental Land Use Restrictions (Sec. 2.10) – *MIRA shall provide a full-size drawing affixed with the stamp/live signature prepared by an engineer (P.E.) licensed to practice in the State of Connecticut or a licensed surveyor (LS) licensed by the State of Connecticut that clearly identifies with labels all areas of the Site subject to the land use restrictions.*
- c. Environmental Justice (EJ) Program - *Given the public interest pertaining to this Site, MIRA shall provide confirmation that EJ staff were contacted and provided information for their review/comment. In addition, the Department recommends that MIRA publish the closure plan and supporting documents on their website for review by interested parties.*
- d. Natural Diversity Data Base (NDDDB) Program – *MIRA shall provide confirmation that NDDDB staff were contacted and provided information for their review/comment, as it appears that the Site is within an area identified as a habitat for endangered, threatened, or special concern species.*

3. Section 3 Closure Elements

- a. Floor Drain and Storm Drains (Sec.3.1.2) – the plan states “...existing storm drainage system ...will be visually inspected at accessible locations...”. *In addition to visual inspections, MIRA shall provide a plan that incorporates the inspection and clean-out of non-accessible locations of the existing storm drainage system and the existing floor drain system, including the associated piping of each system.*
- b. Containers, Tanks, Vessels (Sec. 3.1.3) – the plan states “Tanks with water soluble contents shall be rinsed with potable water to remove residual material... Tanks with non-water- soluble contents shall be emptied to the extent practical and sealed.” *MIRA shall provide a plan that ensures that the tanks are rinsed and emptied in accordance with applicable federal, state, and local laws and that also describes the procedure for sealing said tanks. The plan shall identify that the empty tanks will be removed and transported to a facility authorized to receive such waste. Additionally, the plan shall include the inspection, cleaning, and confirmation sampling of areas where commercial chemical products and drummed and containerized products were stored, throughout the Site.*
- c. RDF Conveyors, Shredders, Trommels, and Packers (Sec. 3.2.1) – the plan states “...portions of the system which are not accessible...shall be inspected and if required...sealed with a surface treatment.” *MIRA shall provide details as to why certain areas are deemed inaccessible and how such a determination was made. In addition, provide detailed information on the surface treatment, which shall include, at a minimum, the following: manufacture's name and chemical composition, examples of success in similar closure activities, durability/longevity, the process for the physical application, and how the determination is made that coverage to areas deemed inaccessible is complete.*
- d. Building Surfaces (Sec.3.2.3) – *MIRA shall provide information pertaining to verification (i.e., confirmation sampling) of the completion of the cleaning activities on all building surfaces of the Waste Processing Facility (WPF).*
- e. Natural Gas Fired Boilers and Heaters (Sec. 3.2.6) – the plan states “...cleaning of these boilers shall not be performed”. *MIRA shall provide the basis for this decision, as the Department considers the boilers/heaters to be a component of the facility's infrastructure and operating equipment and should be included in the Site wide closure activities.*
- f. Power Block Facility (PBF) (Sec. 3.2) – the plan states “...existing equipment will be...sealed to prevent migration of residuals.” *MIRA shall ensure that the closure plan specifies that all existing equipment is subject to inspection, removal of residual waste, cleaning, and verification (i.e., confirmation sampling) of the equipment. The Department requires*

information regarding how the determination to seal equipment was made and as to what procedures and components comprises an effective and reliable seal.

- g. Coal Pond (Sec. 3.3.1) -the plan states "...coal pond is underlain by a liner which shall remain in-place as required under the environmental land use restrictions... which render this portion of the site inaccessible under the Connecticut RSRs... Coal will remain in the lined area under the provisions of 22a-133k-2(c)(5) -Conditional Exemptions to Pollutant Mobility Criteria." *MIRA shall ensure that the closure plan includes specifications for the characterization and off-site removal of the stockpiled coal (estimated at 2,400 tons), as the proposed plan to leave the coal in-place, "...coal will be graded...and four (4) feet of suitable soil will be placed over the coal..." , meets the definition of a solid waste disposal area pursuant to §22a-207 of the Connecticut General Statutes (CGS). MIRA has not been issued a permit for the disposal of solid waste at the Site pursuant to §22a-208a of the CGS. In addition, prior to using any water from the coal pond for the cleaning of building/floor surfaces, MIRA shall characterize such water to ensure that it meets the established criteria for potable water.*
- h. Ash Load-Out and Wheel Wash Building (Sec. 3.3.2) – *MIRA shall provide details pertaining to verification (i.e., confirmation sampling) of the completion of the cleaning activities on all surfaces (e.g., vertical, and horizontal) of the ash load-out and wheel wash buildings, including any floor drain(s) and associated piping.*
- i. Baghouse (Sec. 3.3.3) - *MIRA shall ensure that the characterization and proper disposal of baghouse bags are conducted in accordance with applicable federal, state, and local laws.*
- j. Ash Conveyors, Travelling Grates and Mixer Room (Sec. 3.3.4) - *MIRA shall provide details pertaining to what criteria will initiate the implementation of dust control measures. In addition, details shall be provided pertaining to verification (i.e., confirmation sampling) of the completion of the cleaning activities on the equipment and the mixer room.*
- k. Air Heaters (Sec. 3.3.5); Boilers (Sec. 3.3.6) – *MIRA shall provide details pertaining to verification (i.e., confirmation sampling) of the completion of the cleaning activities on all surfaces (e.g., interior, and exterior) of the air heaters and boilers, including any appurtenant devices to such equipment.*
- l. Cooling Water Intake Structures and Discharge Outfalls (Sec. 3.3.7) – *MIRA shall ensure that the City of Hartford's Department of Public Works Engineering Division; the Greater Hartford Flood Commission; the DEEP's Dam Safety Program; and the U.S. Army Corps of Engineers have been contacted and provided information for their review and comment pertaining to the proposed closure activities associated with the Connecticut River Right Bank, Hartford, CT Flood Damage Reduction System (FDR). In addition, MIRA shall obtain any/all applicable federal, state, and local license(s), permit(s), authorization(s), approval(s), etc. prior to initiating their intended closure activities at the Site.*
- m. Coal Barge Unloading Crane and Dock (Sec. 3.3.11) –*MIRA shall ensure that residual coal shall be characterized and removed off-site for either proper reuse at a facility authorized to receive the coal or proper disposal at a facility authorized to receive such waste.*

4. Section 4 Waste Removal Plan

- a. RDF and MSW (Sec. 4.1) – *MIRA shall provide details pertaining to the proposed cleaning/closure activities, which include but are not limited to: days/hours of operation, timetable for the on-site storage of fully loaded containers, maximum tons per day for the off-site transfer of waste, timetable for the off-site transfer of fully loaded containers, etc.*
- b. Ash (Sec. 4.2) - *MIRA shall provide details pertaining to verification (e.g., confirmation sampling) of the completion of the cleaning activities on all surfaces of the: boilers, bottom*

- and fly ash handling systems/conveyers, the ash load-out building, as well as any areas in the PBF (e.g., floors, trenches, equipment, building surfaces, etc.) where ash is present.*
- c. Hazardous and Universal Waste (Sec. 4.3) – *MIRA shall ensure that the temporary storage of wastes generated during closure shall be appropriately characterized and stored in accordance with state and federal law. Appendix A Photographic Log, Photo No. 20, PBF: Interior” Dozer Garage”/Former Less than 90-day Storage Area date August 6, 2021, shows two 55-gallon drums of synthetic oil stored on a wooden pallet. Department staff were not able to discern any secondary containment in the photograph.*
 - d. Coal (Sec. 4.4) - *MIRA shall ensure that residual coal shall be characterized and removed off-site for either proper reuse at a facility authorized to receive the coal or proper disposal at a facility authorized to receive such waste.*
 - e. Commercial Chemical Products (CCP) (Sec. 4.6) – *MIRA shall provide a full-size (i.e., 24-inch x 36-inch) drawing(s), affixed with the stamp/live signature prepared by an engineer licensed to practice in the State of Connecticut (Connecticut or CT P.E.) or a surveyor licensed by the State of Connecticut (LS), that depicts the location of the temporary storage area for the CCP.*
 - f. Asbestos, Hazardous Materials, and Radioactive Sources (Sec. 4.7) – *the plan states “A 2012 Hazardous Materials Survey report conducted for the northern portion of the administrative building identified the presence of ACM, lead paint, and PCB caulking and glazing. MIRA shall ensure that the removal of asbestos, asbestos containing material(s), lead based paint, and PCB-containing materials are included in the closure plan, regardless of whether building renovation and/or demolition is conducted. In addition, MIRA shall provide written documentation from the Department’s Emergency Response and Spill Division (ERSD) Corrective Action/PCB (CA/PCB) Program that the proposed management of PCB-containing materials is conducted in accordance with state and federal law.*
5. Section 5 Record Keeping Requirements – *MIRA shall include language in the closure plan that stipulates that full-time oversight of the closure activities will be directed by a CT P.E. or a licensed environmental professional (LEP) licensed by the State of Connecticut, that is independent from MIRA.*
6. Section 7 Post Closure Operation
- a. Maintenance and Inspections (Sec.7.2) – *MIRA shall provide details (e.g., frequency, documentation by CT P.E. or LEP, reporting, etc.) pertaining to such inspections. In addition, clarify that the WPF is also included in the inspections, as this section only mentions the PBF.*
7. Section 8 Closure Cost Estimate (Appendix B - prepared by TRC) –*Please provide the cost estimate for the removal and disposal of PCB-containing building material or provide which line item may contain this information, as Department staff were not able to discern such cost in Appendix B. Additionally, please provide a cost estimate for post-closure care (i.e., maintenance and monitoring) for the Site, prepared by TRC, as such estimate was not included in the submitted plan. Further, MIRA shall provide two additional independent cost estimates (which include a 15%-20% contingency) for closure and post-closure care (i.e., maintenance and monitoring). Such cost estimates shall include, at a minimum, an itemized description of all the work to be performed associated with the closure, cleaning, and confirmatory sampling of the closure elements, and post-closure care at the Site.*

Water Permitting and Enforcement Division (WPED) comments:

1. The Water Permitting and Enforcement Division's guidance document titled "Closure/Decontamination Plan Requirements", dated August 7, 2018, and attached, summarizes the elements that are to be included in a permittee's closure plan. The MIRA Closure Plan is lacking complete information for the following elements:
 - a. G: The basis for the volume of wastewater anticipated to be generated during the clean-up and decontamination should be provided.
 - b. I: The drawing (Figure 2) does not identify all the subject locations (e.g., the cooling water intake structure, NPDES discharges, coal pond).
 - c. J: A date for submission of the final report needs to be provided.
2. The following sections of the MIRA Closure Plan should be clarified/addressed:
 - a. Section 2.4, "Pretreatment Discharge Permit – Closure Requirement C" (pp. 2-6): MIRA plans to submit a notification to the MDC for coverage under the MIU GP to discharge "fire protection system wastewaters, air compressor condensate, and other applicable wastewaters that may be generated during closure"
 - i. MIRA already has authorization to discharge fire protection system wastewater and air compressor condensate under the existing pretreatment permit, SP0000850. These wastewaters, along with any other wastewaters included in the "Wastewater Description" in Table A and Table B of the pretreatment permit, may be discharged under the pretreatment permit prior to revocation, if the terms and conditions of the permit can be met.
 - ii. A more detailed description of "applicable wastewaters that may be generated during closure" should be provided.
 - b. Section 3.3.1: Is the coal pond a CCR unit?
 - c. Section 3.3.1: MIRA should evaluate the quality of the water in the coal pond to determine whether the wastewater can be authorized to be discharged.
 - d. Section 3.3.2: No wastewaters/washwaters generated from closure activities should be directed into the coal pond if there is to be a surface water discharge and/or comingling of wastewater to impact stormwater discharges. If the proposal changes and the coal pond is to be discharged to the sewer (MDC), then these activities and discharges need to be disclosed to MDC through their authorization process.
 - e. Section 3.3.9, "Wastewater Treatment Tanks": A Facility and Wastewater Treatment System Modification Request for Determination ("3(i) request") to discharge wastewater associated with decommissioning the treatment system under the existing pretreatment permit (Permit No. SP0000850) should be submitted. The request should detail how specific treatment system components will be decommissioned and how any related wastewaters will be managed and disposed of. The request should also provide the volumes of wastewater anticipated to be generated. Any wastewater discharged must comply with the terms and conditions of the pretreatment permit.
3. Miscellaneous:
 - a. The MIRA Closure Plan was submitted using a certification statement that is different than the certification statement required under RCSA Section 22a-430-3.
 - b. MIRA will need to do some follow-up with the Department after it collects additional information about the proposed discharge from the coal pond.
 - c. For guidance on requesting a revocation of wastewater discharge permits and withdrawal of any associated applications, see attached "Permit Revocation/Surrender and Application Withdrawal Guidance for Permittees".

4. Stormwater Program:

- a. The industrial stormwater general permit will continue in effect throughout the closure activities and potentially beyond depending on the final conditions at the site.
- b. The Closure Plan must include a phasing schedule for specific activities. The site plan should delineate the different phases of the clean-up, the anticipated redirection of stormwater runoff away from the coal pond, and existing and new (if applicable) stormwater discharge locations.
- c. As plans become finalized, recommend that MIRA reach out to schedule a meeting with Stormwater Staff to discuss the proposal and schedule to retrofit the coal pond for passive stormwater management.

Emergency Response and Spill Division (ERSD) Corrective Action/PCB Program comments:

1. Section 3 Closure Elements

- a. Transformers and Electrical Equipment (Sec. 3.1.1) – *MIRA shall ensure and provide written documentation to the PCB Program and EPA Region I, that every transformer is inspected to determine whether such transformers contain PCBs. If the inspection is inconclusive, then MIRA shall have the fluid from the transformer tested for PCBs and as necessary properly manage and dispose of such fluid in accordance with federal, and state law. In addition, per the Federal Regulations, PCB contaminated transformers are PCB Articles and need to be disposed of as such.*

2. Section 4 Waste Removal Plan

- a. Hazardous and Universal Waste (Sec. 4.3) – *MIRA shall ensure and provide written documentation to the PCB Program and EPA Region I, that florescent lamps are inspected to determine whether such lamps contain PCBs. As necessary, any lamps containing PCBs shall be managed and disposed of in accordance with federal, and state law.*

- b. Asbestos, Hazardous Materials, and Radioactive Sources (Section 4.7) - *MIRA shall provide a written description, to the PCB Program, pertaining to what mechanism under the Federal Regulations (40 CFR 761) disposal for >50mg/kg PCB-containing building materials will be used. MIRA shall ensure that such disposal plan has been provided to the EPA Region I for review/comment. Be advised that all identified PCB-containing building materials, regardless of the concentrations, shall be removed, managed, and disposed of in accordance with federal, and state law. Any other building materials that have been tested and have been identified as PCB-containing will also need to be removed. In addition, it is strongly recommended that the substrates of these materials are also tested in case there are PCBs within the substrates. It may be in MIRA's best interest to remove all materials identified and use the Reinterpretation Guidance from the EPA to dispose of these materials. The following websites can provide more information on PCB building materials.*

- [Polychlorinated Biphenyl \(PCB\) Guidance Reinterpretation | US EPA](#)
- Please note that while the table talks specifically about caulk, it applies to all building materials. [Connecticut DEEP Caulk Guidance](#)

Bureau of Water Planning and Land Reuse (WPLR)

Remediation Division comments:

1. The following section should be further addressed.

- a. Section 3.3.1, "Coal Pond", acknowledges that the coal pond liner is protected under Subject Area J of the ELURs. MIRA will need to provide further details and drawings documenting how the Coal Pond will be modified to allow discharge to surface water/ wetlands without

disturbing the liner/ polluted soil beneath the pond. More details will also need to be included on how MIRA plans on removing the coal and ash waste without damaging the underlying liner. The ELUR prohibits inaccessible soil from being exposed as a result of excavation or other intrusive activities.

- b. If the activities will disturb the liner and require modification to the ELUR, an Environmental Use Restriction Form for Allowable Disturbance, Release, Termination, or Post Emergency Abatement Remediation must be submitted. Further instructions on the Release form can be found under the Emergency and Non- Emergency EUR Releases section of the DEEP website.
- c. A clear map documenting all the ELURs that the property is subject to should be provided.

Bureau of Air Management (BAM)

Radiation Division – comments:

1. Section 2 Permits and Regulatory Considerations
 - a. Radioactive Material Registration (Sec. 2.9) states, “MIRA maintains a number of radioactive sources used in material level monitoring systems in the baghouse hoppers, RDF bins, and the coal barge unloading hopper.” *DEEP Radiation Division notes that per MIRA’s rad material registration (Facility ID RMI 0464) also possesses a number of radioactive calibration sources. These must also be maintained on registration and properly disposed of before termination of registration.*
 - b. Radioactive Materials – Closure Requirements A: states, “Following removal MIRA shall notify both NRC and DEEP of the disposition of the devices and request termination of Registration” *DEEP Radiation Division requests that MIRA notify DEEP Radiation Division of both disposition (including transfer to a properly authorized and licensed broker or other licensee) as well as provide copies of source leak check records.*
2. *DEEP Radiation Division requests that MIRA verify they are not holding any radioactive material with short lived isotopes for decay-in-storage and provide attestation in writing.*
3. *DEEP Radiation Division requests upon removal of radioactive material that MIRA ensure no radioactive labels or posting remain on the site or any containers on site and provide attestation in writing.*

Other Comments:

The Department received correspondence (i.e., letter dated August 5, 2022) pertaining to the proposed closure plan from the City of Hartford’s City Engineer and Director of the Greater Hartford Flood Commission (GHFC). Attached is the comment letter, which the Department strongly recommends that MIRA discuss with the City and the GHFC.

Consistency in the information provided through the closure plan and the supporting documentation is critical in the efficient review and processing of any application. To help facilitate the review process, please submit a written response following the numbered outline of the above comments and identify where in the document the appropriate changes or updates have been made and include revision dates on all documents. If a review comment does not necessitate a change in any of the referenced documents, include a response to the comment in a cover letter with your response to this request.

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Nothing in this request for information shall preclude the Department from requiring that additional information be submitted. Please note that performing an activity without the permit required by Title 22a of the General Statutes may subject you to an injunction and penalties.

Upon receipt of the clarifications and information requested, the Department will be able to advance to the next step in the technical review. Please submit these materials within thirty (30) days from the date of this letter. If you have any questions about the processing of your Application, please do not hesitate to contact me at frank.p.gagliardo@ct.gov or David McKeegan at david.mckeegan@ct.gov.

Sincerely



for

Frank Gagliardo, Supervising Environmental Analyst
Waste Engineering and Enforcement Division
Bureau of Materials Management and Compliance Assurance

FG/dm

Enclosure

cc: Christopher Shepard, MIRA
Gabrielle Frigon, DEEP, MMCA
Nancy Wollenberg, DEEP, MMCA
Amber Trahan, DEEP, MMCA
Jeffrey Semancik, DEEP, BAM
Ryan Mowrey, DEEP, WPLR

WATER PERMITTING AND ENFORCEMENT DIVISION CLOSURE/DECONTAMINATION PLAN REQUIREMENTS

1. Elimination of any operation with a contributory discharge, the discontinuation of a discharge or the closure of an entire facility shall require compliance with the requirements of subsections (d) through (h) and (p) of Section 22a-430-3 of the Regulations of Connecticut State Agencies.
2. The closure/decontamination plan shall include, but is not limited to the following information:
 - A. A description of each operation being eliminated and/or each discharge being discontinued.
 - B. The anticipated date of elimination of each operation, discontinuation of each discharge and/or closure of the facility.
 - C. Identification and quantification of all chemicals, solvents, oils and similar materials (virgin, used and waste) being stored on-site and associated with the closure.
 - D. A description of how the materials listed in subsection 2.C. above will be managed (e.g., on-site treatment, off-site disposal, use in another on-site operation, transfer for use at another facility, return/resale to vendor). For all materials to be shipped off-site, the final destination or disposal site must be identified.
 - E. A description of what wet processes and/or waste treatment equipment will remain on-site and what equipment will be removed.
 - F. A description of how the equipment, process and waste treatment areas will be cleaned or decontaminated.
 - G. The volumes of wastewater anticipated to be generated during the cleaning and decontamination and how such wastewater will be managed and disposed.
 - H. Identification of any company hired to perform any closure/decontamination related activities, if applicable.
 - I. A drawing of the facility showing all areas where closure/decontamination activities will be performed, all wastewater treatment equipment, wastewater collection trenches and sumps, and all catch basins, floor drains and any other points through which spills or releases could migrate.
 - J. A schedule for all closure/decontamination activities, including submission of a final report documenting all such activities. The final report shall include copies of appropriate documentation (e.g., manifests, bills of lading) to demonstrate proper disposition of all materials shipped off-site.
3. The permittee shall schedule an inspection of the facility with the Water Permitting and Enforcement Division for verification of all closure/decontamination activities.

Permit Revocation/Surrender and Application Withdrawal
Guidance for Permittees

A permit revocation may be granted if the discharge has or will cease prior to revocation.

A permit surrender may be granted for other reasons, such as transfer to a different permitting mechanism.

Until the permit is revoked/surrendered, DMRs must be reported to DEEP in accordance with the requirements established in the permit. If there is no discharge, DMRs must be submitted indicating that no discharge has occurred.

If the permit will be revoked due to closure of a facility/source of discharge:

Use the list of requirements for a closure/decontamination plan, “Closure- Decontamination Plan Requirements 8/7/18.pdf”. If the closure process has already commenced or is complete, please submit a detailed description, with documentation, of all closure activities. Please include the information required from the attached document. You will be contacted upon receipt of this information to determine if more information will be necessary. Once the closure documentation is received at DEEP, and deemed sufficient, you may request a permit revocation.

To revoke/surrender a permit, you must submit a Letter of Revocation/Surrender that contains the following:

- a statement that the company would like to revoke/surrender permit no. ###
- If there is currently an application being processed for renewal or issuance of the permit, you must also request that the application (include application number) be withdrawn.
- a quick explanation of why the registration is no longer needed (e.g. “the manufacturing line producing the discharge has been discontinued...” or “the wastewater is being transported by a hazardous waste transporter...” or “ a request has been made to discharge the wastewater under a general permit...”)
- the date of last discharge under the permit
- a statement that “as the signatory and duly authorized representative for the Permittee under Section 22a-430-3(b)(2) of the Regulations of Connecticut Agencies, I am waiving the Permittee’s right to a hearing as provided pursuant to Section 4-182(c) of the Connecticut General Statutes and Section 22a-3a-6(i) of the Regulations of Connecticut State Agencies”.
- Proper signature by someone authorized by Section 22a-430-3(b)(2) of the Regulations of Connecticut Agencies. We will check this name against the Secretary of State’s CONCORD webpage (most likely a president, vice-president, etc).
- A hard copy of this revocation/surrender letter must be submitted with a wet signature.

When the request for permit revocation/surrender is received DEEP may schedule and perform an inspection to verify that the permit is no longer needed. When DEEP determines that the permit is no longer needed, a Notice of Revocation/Surrender will be issued.