



*Transmitted Via E-mail*

January 17, 2024

Mr. Christopher Shepard  
MIRA Dissolution Authority  
300 Maxim Road  
Hartford, CT 06114  
[CShepard@ctmira.org](mailto:CShepard@ctmira.org)

Subject: Connecticut Solid Waste System (“CSWS”) Resource Recovery Facility,  
100 Reserve Road and 300 Maxim Road, Hartford, Connecticut  
Closure Plan – 2<sup>nd</sup> Request for Additional Information

Dear Mr. Shepard:

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 review of the Material Innovation and Recycling Authority’s (MIRA) letter dated January 5, 2023, which was submitted in response to the Department’s letter dated October 14, 2022 requesting additional information pertaining to the proposed closure plan for the subject facility.

Based upon the review of internal emails, staff of the Emergency Response and Spill Division, the Remediation Division, and the Radiation Division do not have additional comments/questions regarding the proposed closure plan. Staff of the Permitting and Enforcement Division will provide a separate letter if they have additional comments.

Pursuant to Connecticut General Statutes (CGS) Sections 22a-6, 22a-208, Regulations of Connecticut State Agencies (RCSA) Section 22a-209-13(b), the Department’s *Draft RCRA Closure Guidance for Generators who Store Less than 90 Days Container Storage Areas and Tank Systems* and the May 1, 2013 *Guidance for Implementing and Documenting Closure for Indoor RCRA Hazardous Waste Container Storage Areas*, the Department requires that all non-structural equipment historically used at the CSWS facility be removed and that the MIRA Dissolution Authority provide additional detail in the closure plan pertaining to:

- (1) Closure actions for the Waste Processing Facility (WPF) and the Power Block Facility (PBF) and associated PBF buildings, which shall include dismantling, waste characterization and off-site removal of all waste handling equipment, combustion and post-combustion equipment and ancillary equipment that is not an integral structural component of the respective building(s) and decontamination of the remaining structure(s). Said equipment includes but is not limited to conveyors (including the overhead conveyors used to transport the refused derived fuel from the WPF to the PBF), shredders, trommels, packers, cyclone separators, boilers, traveling grates, mixer room, truck scales etc. Waste characterization shall include analysis for polychlorinated biphenyls (PCBs);
- (2) Verification (i.e., confirmation sampling) of the completion and effectiveness of cleaning activities of all non-porous surfaces (e.g., on steel, fiberglass, structural steel, etc.) and porous surfaces (e.g., concrete, wood, etc.) for all interior building surfaces including but not limited to walls, floors, beams, ceiling, etc., as well as any areas in the PBF and associated buildings (e.g., trenches) where ash may have been present. Such sampling shall include an analysis for PCBs and utilize wipe test methods as appropriate;

- (3) The decontamination and decommissioning of the neutralization basin and the equalization basin; and
- (4) The removal of the coal unloading crane and the decontamination/cleaning/confirmatory sampling of the associated coal transfer structures.

Please submit the requested information within forty-five (45) days from the date of this letter. If you have any questions, please do not hesitate to contact me at [frank.p.gagliardo@ct.gov](mailto:frank.p.gagliardo@ct.gov) or David McKeegan at [david.mckeegan@ct.gov](mailto:david.mckeegan@ct.gov).

Sincerely,



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

FG/dm

c: Mark Daley, MIRA Dissolution Authority [MDaley@ctmira.org](mailto:MDaley@ctmira.org)  
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