



*Transmitted Via E-mail*

May 16, 2024

Mr. Mark T. Daley  
President & CFO  
MIRA Dissolution Authority  
300 Maxim Road, Hartford, CT 06114  
[Mdaley@ctmira.org](mailto:Mdaley@ctmira.org)

Subject: Connecticut Solid Waste System (“CSWS”) Resource Recovery Facility,  
100 Reserve Road and 300 Maxim Road, Hartford, Connecticut (Site)  
Closure Plan

Dear Mr. Daley:

Staff of the Department of Energy and Environmental Protection Bureau of Materials Management and Compliance Assurance’s Waste Engineering and Enforcement Division (Department) has completed a review of the MIRA Dissolution Authority’s submittal dated February 16, 2024 (with attachments) in response to the Department’s letter dated January 17, 2024 requesting additional information pertaining to the proposed closure plan. Attachments included in the letter are as follows: (i) a *Response to 2<sup>nd</sup> Request for Additional Information*, (ii) a letter dated August 8, 2023 to the Commissioner regarding Public Act 23-170 (effective July 1, 2023) which establishes the MIRA Dissolution Authority (MIRA DA) as the successor authority to the Materials Innovation and Recycling Authority (MIRA), and (iii) a *Request for Proposals (RFP) to Conduct the South Meadows Redevelopment Considerations Study (RFP Number 24-AUTH-004)* issued on January 18, 2024 by MIRA DA.

As described in your February submittal, MIRA DA agrees that the closure actions for the Waste Processing Facility (WPF), the Power Block Facility (PBF) and associated PBF buildings shall include dismantling, waste characterization, and off-site removal of all waste handling equipment, combustion and post-combustion equipment and ancillary equipment. Legislative mandates outlined in Section 9(a)(1) of Public Act 23-170 requires that MIRA DA “*identify the immediate environmental needs and knowledge necessary for future redevelopment of the authority’s properties located at 300 Maxim Road in Hartford and 100 Reserve Road in Hartford.*” In order to meet this requirement MIRA DA issued a *Request for Proposals (RFP) to Conduct the South Meadows Redevelopment Considerations Study (RFP Number 24-AUTH-004)*. The RFP includes a number of work tasks and project deliverables, including a written report that will document existing environmental conditions, conceptual site considerations, immediate environmental needs, potential future use, etc. As detailed in the RFP such report will include:

- a survey of all buildings for “Hazardous Building Materials” (HBMs – including but not limited to asbestos, lead-based paint, PCBs); inspection of all buildings to inventory potential HBMs (types, locations, estimated quantities); sampling of potential HBMs to confirm status; an estimate of the costs to abate all HBMs for building renovation or demolition; and an estimate of the costs to demolish all buildings following HBM abatement.
- the review and documentation of the roles and responsibilities of the US Army Corps of Engineers, Greater Hartford Flood Commission (GHFC) and property owner in the ongoing inspection, maintenance and operation of the Site’s Flood Protection System. The review shall include: (i) dike penetrations being dealt with in the closure plan; other legacy penetrations associated with prior Site uses; and other Site

infrastructure encroachments on the Flood Protection System; (ii) the preparation of an Operation, Inspection and Maintenance Plan for existing Flood Protection System penetrations and encroachments, outlining obligations of the Property Owner and estimated costs to meet those obligations prior to proper penetration/encroachment abandonment/removal. This plan shall include but not be limited to a detailed inventory of penetrations/encroachments, including structures attached to, or in close proximity to Flood Protection System including river-side structures, land side structures (e.g., coal barge unloading crane) and structures above Flood Protection (e.g., coal transfer conveyors) as well as a detailed plan for inspection and maintenance, and estimated recurring costs; (iii) the preparation of a report on proper abandonment and removal requirements (per GHFC, US Army Corps of Engineers, and CT DEEP Dam Safety) for each penetration/encroachment of the Flood Protection System. This report shall include but may not be limited to types of permits required and estimated cost of permitting for such work, a description of work required to achieve proper abandonment/removal of each penetration/encroachment, as well as an estimate of costs to properly abandon/remove each penetration/encroachment.

Based upon the review of the information provided, it appears that MIRA DA's February submittal is responsive to the Department's comments pertaining to the proposed closure plan. The Department is amenable to MIRA DA's request that the cleaning of building surfaces, including the neutralization basin and the equalization basin, to a visual clean standard is acceptable until decisions are made on the demolition of said buildings.

However, the Department disagrees with the proposed use of parameters listed in the National Pollutant Discharge Elimination System (NPDES) and Pre-treatment Permit Program (Pre-treatment) permits issued for the Site as appropriate analytical parameters for the confirmatory sampling (MIRA DA response pg. 6 of 8) of the cleaning 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. The use of said parameters for the confirmatory sampling may be appropriate for the neutralization basin and the equalization basin. Additionally, the Department disagrees with MIRA DA's assertion that "the RRF did not process PCB materials, so there is no reason to believe that PCBs would be present in any of the waste or ash residues that remain on the RRF processing equipment or on building surfaces." During the operating life of the RRF there may have been wastes containing PCBs (unknowingly) that were received and processed and therefore the Department will require PCB sampling as stated in the January 17, 2024 letter.

Please be advised that until such time as the Commissioner receives and reviews a comprehensive report on the results of the pending study (i.e., South Meadows Redevelopment Considerations Study) Department staff are not able to recommend an approval of the proposed closure plan for the Site.

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,



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

FG/dm

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