



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

September 16, 2026

The Honorable Doug Dubitsky
The Honorable Anne Dauphinais
State Representatives
47th and 44th Districts
House Republican Office
State Capitol
Hartford, CT 06106-1591
Doug.Dubitsky@housegop.ct.gov
Anne.Dauphinais@housegop.ct.gov

RE: **PETITION NO. 1719** – SMART Technology Systems, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 45-megawatt trash-to-energy electric generating facility and associated equipment on six parcels (Parcel Nos. 007-053A-0045, 007-053A-0042, 007-053A-0043, 007-053A-0041, 008-053A-0147, and 008-053A-0134) owned by O&G Industries, Inc. located east of Black Hill Road (State Route 14) and west of the Providence and Worcester Railroad right-of-way, Plainfield, Connecticut, and associated electrical interconnection.

Dear Representative Dubitsky and Representative Dauphinais:

The Connecticut Siting Council (Council) is in receipt of your correspondence received on September 16, 2026, concerning the above-referenced petition. Thank you for taking the time to provide the Council with the comments.

At a public meeting held on September 3, 2026, the Council voted to hold a public hearing on this matter. A schedule for the public hearing will be developed and publicly noticed in compliance with Connecticut General Statutes (CGS) §4-177(b).

Before reaching a final decision on a petition, the Council must carefully consider all of the facts contained in the evidentiary record that is developed by the Council, the petitioner, parties and intervenors in the proceeding and all of the concerns received from members of the public who speak at the public hearing or submit written statements to the Council.

Please note that you can view the petition filing on the Council's website at <https://portal.ct.gov/csc> under the "Pending Matters" link. You may also keep apprised of Council events on the website calendar and meeting agenda.

Thank you for your interest and concern in this very important matter.

Sincerely,

Melanie A. Bachman
Executive Director

MAB/MP/dll

c: Council Members
Service List, dated August 10, 2026



State of Connecticut
HOUSE REPUBLICAN OFFICE
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591

September 16, 2026

Ms. Melanie Bachman, Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Proposed Trash-to-Energy Electric Generating Facility in Town of Plainfield
PETITION NO. 1719 – SMART Technology Systems, LLC

Dear Executive Director Bachman,

We write further to our June 16, 2026 letter regarding the SMART Technologies trash to energy plant proposed in the Black Hills area of the Town of Plainfield. When we and Senator Heather Somers wrote that letter, no application for the trash plant had been submitted to the Siting Council. Now that an application has been submitted, and the applicant is seeking a declaratory ruling on its application, we are compelled to write in furtherance of our pre-application comments. Senator Somer has previously written separately.

The Town of Plainfield is a Distressed Community. The specific neighborhood in which the trash plant is proposed is also a designated Environmental Justice Community.

As stated in our June 16, 2026 letter, the proposed site is less than 10 miles down-wind from the Wheelabrator trash incinerator in neighboring Lisbon, four miles from Waste Management's Waste Reduction Plant and the Empire Tire Recycling facility in Plainfield, and less than one mile from the Plainfield Renewable Energy wood chip incinerator. The site is also less than twenty miles down-wind of the Covanta trash incinerator in Preston. All are intended to process in one way or another, solid and municipal waste generated in this state. All are "Affecting Facilities" under Connecticut's Environmental Justice statutes, with the Wheelabrator trash incinerator, the Plainfield Renewable Energy wood chip incinerator, and the Covanta trash incinerator being Affecting Facilities affecting both air and waste.

Reviewing the Connecticut Department of Energy and Environmental Protection's Affecting Facilities Map, we have found no other community in Connecticut – and certainly no Environmental Justice Community – with so many existing air and waste Affecting Facilities in such close proximity.¹ Adding yet another air and waste Affecting Facility in Plainfield would be imposing a grave injustice on the residents of that community, and would be disregarding the very purpose of Connecticut's Environmental Justice statutes.

There is no doubt that Connecticut needs a place to process its municipal waste. However, hosting a municipal waste processing facility necessarily suffers a predictable hardship on the residents of the host community and

¹ CT Demographics and Affecting Facilities Application – last visited September 4, 2026 - <https://ctdeep.maps.arcgis.com/apps/instant/basic/index.html?appid=4475ac3bf0434fb399040523698feb60>

those downwind. Put simply, the people of Plainfield are already shouldering far more than their fair share of the state's municipal waste processing burden. Preventing such cumulative environmental impact is the very issue our state's Environmental Justice principles are intended to address. If a new air and waste Affecting Facility must be sited to process the state's municipal waste, it should be sited in a community that is not already carrying a disproportionate share of Connecticut's existing municipal waste processing hardship.

Another significant issue the Siting Council will need to consider is increased truck traffic. The current estimate has been widely publicized as approximately 130 loads of trash to the facility per day – meaning 260 trips per day. Since trash would necessarily haul from towns other than Plainfield, neighboring towns would necessarily be affected. Small towns like Canterbury, Brooklyn, Scotland, Hampton, Chaplin, Sprague, Killingly, Putnam, Sterling, Griswold, Voluntown, and others – some of which are themselves Environmental Justice Communities – would see significantly increased truck traffic on rural roads never intended for such traffic.

In short, there is far too much for the Siting Council to consider, and from too diverse a population, to process SMART Technology Systems, LLC's application on a summary basis. If our state's Environmental Justice statutes are to mean anything, the Siting Council must, at minimum, require full certification and a robust public hearing process at which all affected Environmental Justice Community residents and stakeholders may have their voices heard.

We therefore respectfully join Senator Somers and the people of Plainfield and surrounding towns in requesting that the Connecticut Siting Council:

1. Reject SMART Technology Systems, LLC's request for a declaratory ruling;
2. Require a full certification and public hearing process, with the comprehensive review and scrutiny that a project of this magnitude warrants;
3. Hold at least one in-person public hearing in Plainfield before making any substantive determination regarding this proposal;
4. Give substantial weight to the concerns of the residents of Plainfield and surrounding towns who will bear an even more unfair and more disproportionately large share of the state's municipal waste processing burden with the addition of yet another air and waste Affecting Facility in close proximity; and
5. Ultimately reject the proposed siting of another Affecting Facility in Plainfield.

We thank you for your consideration. Please feel free to contact us if you have any questions, or if there is any way we can assist in your review of the application.



Doug Dubitsky
State Representative – 47th District



Anne Dauphinais
State Representative – 44th District