

October 1, 2026

VIA ELECTRONIC MAIL

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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 Attorneys Hoffman, Boucher and Feinn:

The Town of Plainfield requests your response to the attached questions no later than October 15, 2026.

Very truly yours,



Ann M. Catino

Cc: Service List dated September 17, 2026

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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,
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Industries, Inc. located east of Black Hill
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of-way, Plainfield, Connecticut, and
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Petition No. 1719

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TOWN OF PLAINFIELD

INTERROGATORIES TO PETITIONER SMART TECHNOLOGY SYSTEMS, LLC

1. Explain the site selection process conducted by SMART or any of its partners, owners, consultants or affiliates for purposes of developing the proposed facility, and describe what and where other sites were considered and what ones were rejected and why. Include a discussion as to why the Plainfield location was the preferred selected site and the other sites were ruled out.
2. Has a smaller scale facility similar in kind to the one proposed in Plainfield been pilot-tested in the United States? If so, please explain where, and what were the results.
3. Has SMART considered first developing a pilot facility? If so, what were its findings. If not, please explain.
4. Section 1.2 of the Petition indicates that SMART is owned "in part" by O&G Industries, Inc. ("O&G"). Who is/are the other owner(s) of SMART beyond O&G?
5. Please explain O&G's experience in constructing, operating and/or maintaining a transfer station, recycling facility, waste-to-energy facility or a waste gasification facility and list the facilities it has been involved in.
6. What will be the role of Advanced Waste Technologies International, LLC ("AWTI")?

7. Please explain AWTI's background and experience in the solid waste industry in Connecticut.

8. Has AWTI ever developed a facility as SMART is proposing? Does AWTI have experience anywhere operating a facility like the one proposed?

9. As to SMART, O&G, AWTI and each of its owners, identify any solid waste facilities such entity has owned, operated and/or owned and operated, whether in Connecticut, the United States or in the world. As to each facility, identify its location, the type of solid waste facility it is, whether it is or was a waste-to-energy facility and, if so, what kind of waste-to-energy facility it is.

10. If the answer to item 9 includes any solid waste facilities that are waste gasification facilities like is proposed in Plainfield, please explain the age of the facility, its type, its megawattage, the source of its waste and/or fuel, and its operational history since it became operational.

11. The Petition indicates that Valmet Industries, Inc. ("Valmet") developed the gasification technology to be used by SMART (Petition, p. 5). Besides the plant in Lahti Finland, what other solid waste RDF gasification facilities has Valmet designed and put into operation?

12. Bulk Handling Systems ("BHS") is identified as the company who will provide waste separation and recycling at the facility (Petition, p. 6). Can SMART explain BHS's experience designing and providing RDF systems for MSW.

13. How will the BHS system remove the food waste and organics from the MSW delivered to the facility?

14. How will the BHS system remove glass?

15. In the Petition, page 10, glass, metals and electronics are identified as the recyclables to be removed from the raw MSW. What will happen to the cardboard, paper, and plastics that also get mixed with MSW but are also considered recyclables in the State of CT?

16. On page 11, can SMART explain how "separated recyclables" that are required to be recycled are otherwise landfilled as ash?

17. Once the "separated recyclables" are removed from the MSW, and the organics separated out, what waste is left to be converted into RDF?

18. What examples and experience can SMART provide regarding AECOM's experience with RDF MSW gasification facilities?

19. Since Lahti, what other MSW/RDF gasification plants have been constructed and are currently in operation? Are any of these plants MSW/RDF facilities like the one proposed here?

20. Please identify the countries that have abandoned waste gasification plants like the one proposed in the last 15 years and explain why the country elected to abandon the concept.

21. What municipalities in Connecticut have provided a letter of intent that the municipality will provide the municipal solid waste that is required as feedstock for the facility? Of these municipalities, which ones were former customers of the MIRA Hartford waste to energy facility that shut down?

22. Has SMART investigated and evaluated the municipalities that will not be under a municipal solid waste agreement in 2030 when this facility is proposed to be operational? What are the Towns and how much municipal solid waste will be provided or is projected to be provided by each of the municipalities? What is the proximity of those municipalities to the facility?

23. Beyond permitting, what is the role of the State of Connecticut in the development of this project?

24. On page 9 of the Petition, SMART indicates that the Lahti plant received significant funding from both the European Union and the Finnish government. How much did the Lahti facility cost and what was the percentage of EU and Finnish support?

25. What is the projected construction cost of the facility?

26. How will the facility be financed? Provide an explanation of all sources of funding and financing for the project, including whether any public financing will be provided. If public financing from the State of Connecticut will be used, please identify the source of funding, amounts and status of such funding.

27. What is the tipping fee anticipated to be? How will it be subsidized?

28. On page 3 of the Petition, please identify how much waste previously processed by MIRA is now being landfilled out of state and why it is a “temporary diversion that is in the planning stage of being phased out”? Who is phasing it out? How will SMART interrupt existing municipal solid waste contracts to obtain in-state waste?

29. What Connecticut municipalities are currently shipping their municipal solid waste out of state?

30. What fuel will be used to bolster the gasification process? How much fuel will be needed to offset the heterogeneity of the MSW? Has that dual fuel been modeled for purposes of air emissions and ash content?

31. If oil and/or coal and/or natural gas is used to bolster the gasification process, how does the facility maintain its status as a Class I or Class II renewable energy facility?

32. How will the solid waste/RDF feedstock moisture content, which by the nature of solid waste contains a variety of wastes with varying water content, be maintained such that maximum temperature is obtained and oxygen is minimized.

33. The Petition suggests that this is a new technology, however, wasn't gasification of solid waste originated over 50 years ago? If SMART contends it is "new", explain how the technology has changed over time.

34. Isn't the reason MSW gasification hasn't achieved commercial success is due to the failures associated with creating and maintaining MSW as a homogeneous feedstock?

35. Isn't the formation of tar an operational concern for this type of facility? What plans and/or steps does SMART have planned to limit tar build up?

36. What are SMART's plans to remove the heterogeneity inherent in Connecticut's MSW feedstock ?

37. If the Lahti Finland plant is the model, can you explain why it hasn't been replicated in other countries?

38. Please explain the differences between this proposed facility and the ones where fires and explosions occurred that led to partial and/or permanent plant shutdowns in:

- a. Karlsruhe, Germany
- b. Hamm, Germany
- c. Dumfries, Scotland
- d. Mie Prefecture, Japan
- e. Ohmuta City, Japan

39. What is the time durations SMART is planning for scheduled maintenance outages annually? What is the basis for this assessment?

40. During any planned or unplanned outage, will the MSW and / or MSW/RDF be stored on-site? Where? Or where will it be sent?

41. Please explain the source separation system used at the Lahti plant. Will the proposed facility utilize the same or similar system? If not, why not; and how will source separation be used?

42. The Petition first describes a "dry anaerobic digestion plant (pg. 11) but then refers to two "semi-dry digesters" (pg. 13) involving microbes and the "recirculation of liquid." Which is correct? How will the effluent from this process be treated or otherwise disposed of?

43. The Petition states that "no portion of the MSW received will remain behind – no on-site ash landfill is being proposed or needed." Petition pg. 4. Notwithstanding that statement, the Petition describes the creation at the proposed facility of "inert ash" and/or "bottom ash" (pg. 15), and "carbon and ash fines", "fly ash" and "fines." (p. 17). The Petition goes on to state that some or all of these ash products will be trucked offsite for "beneficial reuse or for licensed

disposal” (Id.) What quantities of these various ash products will be generated by the proposed facility, and where and how will they be disposed of? How many truck trips will be necessary to cart off these ash products?

44. The Petitioner’s Traffic Study (Exhibit N to the Petition) indicates that traffic counts were made on a very small number of dates, including December 12, 2023 and March 6, 2024. Please explain how these dates were selected.

45. What makes the facility’s MSW tipping, processing and anaerobic digestion spaces “unique enclosed spaces”? (Petition, p. 30). Please explain how the tipping floor will be enclosed and different from the other tipping floors at waste-to-energy facilities in Connecticut.

46. Is Plainfield in an attainment or non-attainment area for ozone?

47. Is Plainfield in an attainment or non-attainment zone for NO_x, SO₂, and PM_{2.5}?

48. What is the basis for determining the dioxin emissions from the proposed facility?

49. Regarding heavy metals, what is the basis for projecting these emissions to be lower than the existing “mass burn” waste-to-energy facilities.

50. How will SMART achieve the lower PM and PM_{2.5} standards set by the EPA?

51. At the time of the Petition, at page 36, SMART states that preliminary modelling runs conducted by SMART did not pass the Significant Impact Level for 1-hr NO_x, 1-hr SO₂, 24hr SO₂, and annual SO₂. Has further modelling since been conducted? What has it revealed?

52. How will SMART achieve a lower NO_x standard?

53. What will the HAPs be that are emitted?

54. SMART has asserted that SMART has the technology that can meet all the new EPA requirements and it’s technology is unlike any constructed or operating in the United States. Please explain how that is true if the technology has never been operated in the United States ?

55. Does DEEP agree with the above assertion that SMART has the technology to meet EPA’s standards now?

56. Has DEEP reviewed the calculations projected by SMART? Has DEEP issued completeness determination? What questions has DEEP asked thus far regarding the air application and the potential emissions, calculations and modelling? Has DEEP raised any questions, concerns or issues or provided further comments and guidance with the air application? If so, what has DEEP said either orally, via email or in a letter or other correspondence?

57. Has SMART received a commitment from CWC that it has sufficient water supply to meet the needs of the project, including the maximum demand required of 260,000 gal/day in the event of a fire?

58. Has SMART conducted a survey of the private and public drinking water supply sources in the area of the property, at least within 5000 feet?

59. Does SMART know the direction of groundwater flow from the property?

60. Has SMART conducted any further review of the wildlife impacts that may be associated with odors, noise, truck traffic and air emissions to ascertain the facility's impact on the thirteen state-listed species and three critical habitats that are listed on the State Natural Diversity Database?

61. Please explain how SMART plans to regulate truck traffic, particularly to keep trucks off of Picket and Jackson Roads.

TOWN OF PLAINFIELD,



BY: _____

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CERTIFICATION

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on October 1, 2026 to all counsel and self-represented parties of record.

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