



## **BENEFICIAL USE DETERMINATION AUTHORIZATION**

GE Vernova Operating Services, LLC

Reuse of 15 – 30 % Sodium Hydroxide (NaOH) in place of 25 % Commercially Virgin NaOH used to  
Control Scrubber pH at a Water Pollution Control Facility  
Authorization No. BUD-

### **I. AUTHORIZATION INFORMATION**

- A. Licensee Name: GE Vernova Operating Services, LLC
- B. Mailing Address: 38 Charles Street, Cambridge, MA 02141
- C. Application No.: 202408395
- D. Received: August 13, 2024, revised October 17, 2024
- E. Expiration date: Five (5) years from issuance

### **II. BENEFICIAL USE DETERMINATION**

- A. Pursuant to Connecticut General Statutes (“CGS”) Section 22a-209f, the Commissioner of Energy and Environmental Protection (“Commissioner”) hereby issues this Beneficial Use Determination Authorization (“BUD Authorization”) to GE Vernova Operating Services, LLC (“Authorization Holder” or “Licensee”).
- B. This BUD Authorization is effective on the date it is signed by the Commissioner (the date of issuance) and expires five (5) years from such date of issuance.
- C. This BUD Authorization is consistent with the goals of Connecticut’s state-wide solid waste management plan entitled *2016 Comprehensive Materials Management Strategy*, does not pose a significant risk to human health or the environment and is not inconsistent with the federal Water Pollution Control Act, the federal Rivers and Harbors Act, the federal Clean Air Act, or the federal Resource Conservation and Recovery Act.
- D. All activities authorized through this BUD Authorization shall be conducted in accordance with the BUD application received from the Licensee on August 13, 2024 as revised on October 17, 2024 and as adopted or amended through the terms and conditions of this BUD Authorization. Where the conditions contained herein are in conflict with the BUD application, the more stringent conditions shall apply.

### **III. AUTHORIZATION**

- A. The Licensee is authorized to offer 15 – 30 % NaOH aqueous rinsate (hereinafter, “used NaOH”), generated by cleaning aircraft parts by the Licensee at its facility in Schenectady, NY, to the Borough of Naugatuck, CT Water Pollution Control Facility (“the Recipient”) at 500 Cherry Street in Naugatuck, Connecticut (“the Site”). Such used NaOH shall be used in place of commercially available virgin 25% NaOH aqueous solution (“virgin NaOH”). The used NaOH shall only be used by Veolia Water North America Operating Services

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(“Veolia”) to control scrubber pH at the Borough of Naugatuck sewage sludge incinerator. The used NaOH is expected to replace 50 – 90 percent of the virgin NaOH currently used by Veolia at the Site.

- B. The Licensee shall provide written notice to Veolia and the Recipient that the used NaOH is not to be: (i) placed in waters of the state; (ii) placed below the water table; (iii) placed in an area that is subject to erosion; or, (iv) used by any other entity not named in this BUD Authorization or in any manner inconsistent with the conditions of this BUD Authorization.

### **IV. OPERATING CONDITIONS**

- A. The beneficial use of the used NaOH shall be in compliance with all applicable state, local and federal laws and regulations.
- B. The used NaOH shall not be used except as authorized by this BUD Authorization unless otherwise approved in writing by the Commissioner in accordance with Condition No. VI.J. of this BUD Authorization.
- C. The Licensee shall notify the Commissioner in writing of any changes in its process that may alter the physical or chemical characteristics of the used NaOH. Any changes in the processes generating the used NaOH, or the use of the used NaOH other than as specified in Section III. of this BUD Authorization shall require additional review and written approval by the Commissioner, which may include additional analytical characterization of the used NaOH.
- D. The Licensee shall ensure that only used NaOH that is suitable for use at the Site is provided to the Recipient. The Licensee shall ensure that only suitable used NaOH is provided to the Recipient. Any unsuitable used NaOH generated by the Licensee shall be disposed of appropriately.. The Licensee shall maintain records of such notification, including the quantity and the disposition of the unsuitable NaOH (i.e., recycled or disposed of at a facility authorized to accept such waste).
- E. The Licensee shall ensure that employees are sufficiently trained to identify materials that are not used NaOH and take proper action to keep such materials separate from used NaOH in storage.

### **V. TESTING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

- A. Analytical Testing Requirements
  - 1) The Licensee shall characterize the used NaOH whenever there is any change in the parts cleaning process at the Licensee’s Schenectady, NY production plant. Analytical testing shall be as delineated in the Application for this BUD Authorization and be conducted in accordance with methods published by the U.S. Environmental Protection Agency or the Connecticut Department of Energy and Environmental Protection (DEEP). Testing shall be performed at a certified laboratory.

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- 2) The Licensee shall provide the Recipient a copy of the most recent analytical testing results upon the Recipient's request.

### **B. Recordkeeping Requirements**

The Licensee shall maintain copies of the most recent analytical testing results of used NaOH and the volumes of used NaOH shipped to the Recipient, at the Licensee's primary business office and at the Schenectady, NY production plant for the life of this BUD Authorization or such other timeframe specified in writing by the Commissioner.

### **C. Reporting Requirements**

- 1) The Licensee shall submit to the Commissioner quarterly volume reports of used NaOH shipped to the Recipient, no later than January 31, April 30, July 31, and October 31 of each year on forms prescribed by the Commissioner.
- 2) Upon written request from the Commissioner, analytical testing results and records shall be submitted to the Bureau of Materials Management and Compliance Assurance, Solid Waste Program in accordance with Conditions No. VI.B. and VI.C. of this BUD Authorization.

## **VI. GENERAL CONDITIONS**

- A. This BUD Authorization is non-transferable.
- B. Unless otherwise specified in writing by the Commissioner, any documents required to be submitted under this BUD Authorization shall be directed to:

Solid Waste Program  
Waste Engineering and Enforcement Division  
Bureau of Materials Management and Compliance Assurance  
Department of Energy and Environmental Protection  
79 Elm Street, Hartford, CT 06106-5127  
Or via email to [DEEP.Solid&HazWasteReports@ct.gov](mailto:DEEP.Solid&HazWasteReports@ct.gov).

- C. Any document, including, but not limited to any notice, which is required to be submitted to the Commissioner under this BUD Authorization shall be signed by a duly authorized representative of the Licensee, as defined in Section 22a-430-3(b)(2) of the RCSA, and by the individual or individuals responsible for actually preparing such documents, each of whom shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement in the submitted information may be punishable as a criminal offense."

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Any false statement in any document submitted pursuant to this BUD Authorization may be punishable as a criminal offense in accordance with Section 22a-6 of the CGS, pursuant to Section 53a-157b of the CGS, and in accordance with any other applicable statute.

- D. If at any time the Commissioner determines that any activities authorized herein can reasonably be expected to cause pollution to the waters of the state or otherwise adversely impact human health or the environment, the Commissioner has the sole discretion to terminate such activities. Such activities shall cease on or before ten (10) days from the date of written notice from the Department.
- E. This BUD Authorization is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to, any and all public and private rights and to any federal, state, or local laws or regulations pertinent to the location or activity affected thereby.
- F. Nothing in this BUD Authorization shall affect the Commissioner's authority to institute any proceeding or to take any actions to prevent violations of law, prevent or abate pollution or natural resource damages, recover costs and to impose penalties for violations of law.
- G. Nothing in this BUD Authorization shall relieve the Licensee of other obligations under applicable federal, state and local laws.
- H. The Licensee shall provide the Commissioner, within seven (7) calendar days or an alternative period prescribed by the Commissioner, any information that the Commissioner may request and which is deemed by the Commissioner to be relevant in determining whether a cause exists to modify, revoke, or suspend this BUD Authorization or to determine whether the Licensee is complying with the terms and conditions of this BUD Authorization.
- I. The Licensee shall comply with all terms and conditions of this BUD Authorization. This BUD Authorization consists of the conditions contained herein and the specifications contained in the application documents, except where such specifications are superseded by the more stringent conditions contained herein. Violation of any provision of this BUD Authorization may be subject to enforcement action pursuant, but not limited to, Sections 22a-6, 22a-208, 22a-225 and 22a-226 of the CGS.
- J. The Licensee shall submit for the Commissioner's review and written approval all necessary documentation supporting any proposed improvements and/or minor changes to this BUD Authorization. The Commissioner may issue a written approval only if, in the Commissioner's judgement, the improvements and/or minor changes: (a) are deemed necessary for a better and more efficient operation; and (b) do not significantly change the nature of this BUD Authorization, or its impact on the environment.
- K. The Commissioner reserves the right to revoke, suspend or modify this BUD Authorization by the imposition of additional conditions based upon a situation of significant odor, dust, other nuisance, or a determination of actual, or the threat of, adverse impacts from the beneficial use of the used NaOH.

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- L. This Authorization shall expire five (5) years from the date of issuance and may be revoked, suspended, modified, or renewed in accordance with applicable laws.

Date \_\_\_\_\_

By \_\_\_\_\_

Jennifer L. Perry, P.E., Chief

Bureau of Materials Management and Compliance Assurance

Application No. 202408395

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Licensee – e-Certified