

EarthLoop LLC  
Country Holding Company LLC  
530 South Cherry Street  
Wallingford, CT 06492

To Whom It May Concern,

This communication is in response to the Connecticut Materials Management Infrastructure Request for Information, the purpose of which is to solicit information on materials management infrastructure from key stakeholders. We certainly consider ourselves as a key stakeholder in the evolution of Connecticut's solid waste strategy. We are also uniquely positioned to help the state of Connecticut achieve its diversion goals and address the current solid waste challenges.

In 2017 Country Holdings LLC entered discussions with Covanta Energy to purchase the facility at 530 South Cherry Street in Wallingford CT, a site that was once operated as a Resource Recovery Facility (RRF) and was created under the Materials Innovation and Recycling Authority (MIRA). Covanta had made the decision to stop RRF operations at this facility in 2015, despite that fact that the RRF components at the facility were still fully operational. Covanta Energy cited numerous reasons for wanting to stop RRF operations at the facility, including but not limited to A). Decrease in revenue from electrical generation B). Decrease in revenue from steam generation C). Being locked into long term disposal contracts with municipalities at a current tip fee below market average D). A shift in strategy away from operations in the United States. In 2015 Covanta transitioned the facility to a transfer station in order to honor its obligations to the municipalities in which it had contractual obligations to accept MSW. We entered a sales agreement with Covanta Energy to purchase this facility, and took ownership in December of 2018. We have been operating this facility as a transfer station ever since.

As a team of solid waste and recycling professionals with experience operating in Connecticut, we saw unique and exceptional potential in this facility at 530 South Cherry Street. This was the first of the original six CT RRF facilities to come off line, but was joined in 2020 with the closure of the MIRA facility in Hartford. This brings us to the escalation of Connecticut's "waste crisis" of which we are all acutely aware. It has always been our intention to update our facility in Wallingford into a "Next Generation Materials Management Campus" that can help us further our organizational objectives: REDUCE-RECYCLE-RECOVER. Our plans for this facility have unfortunately been delayed by Covanta's failure to meet its obligations to us under the purchase and sales agreement, as well as a delay in Covanta's closure plan for the RRF portion of the facility. The Covanta closure plan has now been approved by CT DEEP, and we are hopeful that the successful completion of the closure plan will be completed in 2023. This will give us a clear path to move forward with our plans of transitioning to a Next Generation Materials Management Campus (NGMMC).

It is our sincere belief that source separation and processing of organic material needs to be a vital component of our NGMMC. We have already started to move towards that objective with our participation in the CT DEEP Food Waste Grant Program. In 2022 we received approval for a demonstration permit with CT DEEP to conduct activities pursuant to the collection, sorting, and transport of source separated organics as part of the CT DEEP Grant Program. We have also submitted a permit amendment that, among other objectives, would allow us to continue these organic food waste operations that are proving vital to the success of this program. As the “sole sorting facility” to nine municipalities participating in the program, we have already have the equipment, manpower, and experience to collect, sort, and transport source separated organics and MSW.

As the State of Connecticut seeks to facilitate the development of waste infrastructure, the advantages of our facility at 530 South Cherry Street are obvious:

1. Location
  - a. Centrally located in Wallingford with logistical proximity to many municipalities
  - b. Directly off of I-91, minimal truck impact to residents
  - c. Industrial Zone, surrounded by factories and land
  - d. Not an Environmental Justice Community
  - e. Directly on rail
2. Facility
  - a. 9.8 acres
  - b. Approx 85,000 Sq Ft Building
  - c. Huge Tipping floor with 8 bays and storage pit
  - d. RRF facility- incinerators, boilers, economizers, ash house, cooling tower, air scrubbing equipment, air stack, steam pipes, steam turbine, electrical switch
3. Ownership and Operation
  - a. Solid waste and recycling professionals with experience operating in CT
  - b. Committed to creating a Next Generation Materials Management Campus (NGMMC)
  - c. Organizational objectives: Reduce-Recycle-Recover
  - d. Source Separation of Organic Waste
  - e. Already possess infrastructure to collect, sort, and transport source separated organics

Our vision for the NGMMC located at 530 South Cherry Street includes the following:

1. Facilitation of processes to reduce the amount of MSW generated in CT
  - a. Source separation of organics (bag program)
  - b. Single stream recycling
  - c. Additional recycling programs- textiles, etc.
  - d. Co-collection to reduce cost of trucking and reduce Vehicle Miles Traveled (VMT)
2. Anaerobic Digestion of organics (on site)

3. Processing facility to sort, process and monetize recyclables
4. Some process to resource recover whatever non-organic material can not be recycled
  - a. Gasification?
  - b. Pyrolysis?
  - c. Incineration?

Unfortunately, due to Covanta Energy's failure to fulfill its obligations to us under the purchase and sale agreement of the facility, some of the RRF equipment has been damaged and thus will be removed under the Covanta Energy Closure plan. Still, much of the equipment remains and the entire infrastructure remains. We are miles ahead and millions of dollars ahead of any facility development that would have to start from scratch. We are that much closer to quickly and economically providing additional disposal, recycling, and AD infrastructure in Connecticut.

We have already begun discussions with key development partners to move this project forward. Our next plan is to submit our own RFI and eventual RFP for the facility in order to identify qualified partners in our NGMMC. We feel it is vitally important that we keep an open line of communication with CT DEEP and other relevant decision makers in the Connecticut legislature. Partnership will be key to a successful outcome.

To summarize, our facility is very uniquely positioned to be able to achieve all of objectives outlined in the latest version of CMMS roadmap at one location, creating a true Next Generation Materials Management Campus (NGMMC). Just as important- we have the ability, experience, expertise, and desire to do it. We currently own and operate the only privately owned former RRF facility in the state of Connecticut. As such, we are a key stakeholder as this state move towards its goals of waste reduction and waste independence. We look forward to a discussion where we can align objectives and identify next steps.

Sincerely,

Richard Antonucci Jr.  
REDUCE-RECYCLE-RECOVER

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