

ATTACHMENT B

CERTIFICATION OF SUBMITTAL (310 CMR 16.07)

Pursuant to 310 CMR 16.07 this certification must be included with your response to the Request for Information

I, Paul Degnan, attest under the pains and penalties of perjury that:

(a) I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;

(b) based on my inquiry of those persons responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete;

(c) I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and

(d) I am aware that there are significant penalties, including, but not limited to, possible administrative and civil penalties for submitting false, inaccurate, or incomplete information and possible fines and imprisonment for knowingly submitting false, inaccurate, or incomplete information.

By:

[Signature]
Signature

10/28/22
Date

Market Area Manager
Title

For:

Casella Waste Systems, Inc.
Company Name

October 28, 2022

Mr. Robert Tocchio
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

RE: RFI Response

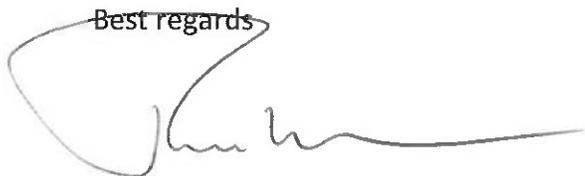
Dear Robert;

In response to the MA DEP's Request for Information regarding the operational performance of the Auburn Transfer Station and Materials Recovery Facility (MRF), I have completed and included your Attachment C. I have also included an additional attachment with data for our inbound materials. I have answered the destination to the best of my knowledge. In regard to the glass sent to Strategic Materials in Wilson, NC, I believe some of their markets include Bottle Production and some Fiberglass Production.

Casella Waste does not plan on any retrofits or significant changes to equipment at the Auburn facility.

Please contact me anytime for further information.

Best regards

A handwritten signature in black ink, appearing to read "Paul E. Degnan", with a large, sweeping flourish extending to the right.

Paul E. Degnan
Casella Waste Systems, Inc.



Memo

To: Robert Tocchio
From: Austin McKnight
cc: John Fisher
Date: 10/26/2022
Re: Response to Information Request

Casella Recycling Charlestown has a complete facility retrofit planned for 2023. All equipment will be removed from the facility and replaced with new system provided by Machinex. There will be several current pieces of equipment that will be rebuilt and reused in this system as well, such as balers, screens, glass recycling equipment and conveyors. Further details of this project are currently under review by MADEP.

The planned start date of this project is January 16, 2023 for the initial clean up, with the full project getting underway the following week of January 23rd. The expected duration of the project is 19 weeks and is planned to be up and fully operational by mid-June of 2023. There will still be some materials received on site and transloaded out to other facilities. Diversion plans will be submitted to MADEP for review.

The changes will increase the throughput of the Facility from 45 to 50+ tons per hour and allow recovery of some of the smaller items in the stream for recycling. It will also reduce contamination levels and make a better quality end products.

If you have any further questions, please feel free to give me a call at 508-887-0559



BFI Brockton Recyclery Material Recovery Facility
190 Mulberry Street
Brockton, MA 02302
o 508.580.1511

October 25, 2022

Executive Office of Energy & Environmental Affairs
Massachusetts Department of Environmental Protection
Division of Solid Waste Management
One Winter Street
Boston, Massachusetts 02108

RE: Request for Documents & Information Pursuant to MGL Ch. 111 Section 150A and 310 CMR 19.000
BFI Brockton Recyclery Material Recover Facility
Facility ID Number: 133562

Mr. Tocchio:

The BFI Brockton Recyclery Material Recovery Facility (Brockton MRF), a subsidiary of Republic Services, was issued a Request for Information (RFI) dated September 29, 2022 from Deputy Director John Fischer with the MassDEP Boston Office. The RFI is part of an operational performance investigation by MassDEP of the Brockton MRF under M.G.L. c. 111 § 150A and 310 CMR 16.01(5).

As specified and outlined in the RFI a separate response is made by the Brockton MRF for each of the items requested in numerical format under Attachment A. Additionally, the Certification of Submittal Pursuant to 310 CMR 16.07 "*Certification of Submittal*" and 310 CMR 19.011 regarding "*Signatories and General Certification*", identified as Attachment B, will be included in our response.

Documents and Information Requested:

1. Completed spreadsheet under MassDEP Attachment C for calendar year 2021 and for January-June 2022 – **See BFI Response Letter Attachment A**
2. Identification, if applicable, of any additional material type and amount in tons other than mixed single stream recyclables – **See BFI Response Letter Attachment A**
3. Description, if applicable, of any additional equipment or facility retrofits planned within the next 12 months including– **Not Applicable; No change to equipment, expected closure date, or processing capacity within next 12 months**

Should you have any questions regarding the contents herein please do not hesitate to reach out at your convenience.

Regards,

A handwritten signature in cursive script that reads "Fred Morrow". The signature is written in black ink and is positioned above the typed name and address.

Fred Morrow
BFI Brockton MRF - Facility Manager
190 Mulberry Street
Brockton, MA 02302

Certification of submittal (310 CMR 16.07)

Pursuant to 310 CMR 16.07 this certification must be included with your response to the Request for Information.

I, Jul Marlow, attest under the pains and penalties of perjury that:

- (a) I have personally examined and am familiar with the information contained in this submittal, including all documents accompanying this certification statement.
- (b) based on my inquiry of those persons responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete.
- (c) I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and
- (d) I am aware that there are significant penalties, including, but not limited to, possible administrative and civil penalties for submitting false, inaccurate, or incomplete information and possible fines and imprisonment for knowingly submitting false, inaccurate, or incomplete information.

By: Jul Marlow _____
Signature Date

Division Manager _____
Title

For: Republic Services _____
Company Name



October 31, 2022

Sent via email: robert.tocchio@mass.gov

Massachusetts Department of Environmental Protection
Solid Waste Management Division
One Winter St
Boston, MA 02108
ATTN: Mr. Robert Tocchio

RE: Request for Documents & Information dated September 29, 2022
WM Avon Material Recovery Facility, MassDEP Facility ID Number 383598

Dear Mr. Tocchio,

WM Avon, Inc. d/b/a WM Recycling Avon (WM Avon) is providing this letter and attached documentation in response to the Massachusetts Department of Environmental Protection (MassDEP) Request for Documents and Information (RFI) dated September 29, 2022 for our Avon Material Recycling Facility (MRF). A separate response is made below to each of the requests in the RFI, and each answer is labeled with the number of the request to which it responds.

- 1. Please complete all information in the attached spreadsheet, labeled Attachment C. Note that there is one sheet for calendar year 2021 and a second sheet for January – June 2022. Please fully complete both sheets.**
 - a. Note that the request includes additional information on the type of market outlet for glass, including the amount of glass, in tons, sent to:**
 - i. Bottle production**
 - ii. Fiberglass production**
 - iii. Processed glass aggregate**
 - iv. Daily cover or other landfill-based use**
 - v. Other – (please specify if applicable)**
 - b. For receiving country or state, please list all that apply.**
 - c. If there are other recyclable materials marketed beyond those listed, please use the “Other” rows to add materials and add additional rows if needed.**

WM Avon completed all requested information on the spreadsheet attached to the RFI. The completed sheets are attached as hardcopy .PDF pages to this letter and Microsoft Excel files are attached to the transmittal email.

- 2. If you accept incoming material other than mixed single stream recyclables, please provide the material type and amount in tons. (e.g., corrugated cardboard, dual stream paper, dual stream containers, etc.)**

Incoming material other than mixed single stream recyclables accepted at the facility in 2021 and January through June 2022 are listed in the table below with their respective tonnage.

Incoming Material	2021 Tons	2022 (Jan-Jun) Tons
Coated Book	2.79	10.19
Container Stream	227.08	35.75
Film	40.70	12.11
LDPE	2.82	1.73
Mixed Paper	20.13	0.34
Mixed Recyclable (Plastics)	447.22	166.92
Mixed Rigid Plastics	35.57	18.88
OCC	28,541.47	12,221.91
PET Banding	4.17	4.02
Residue (Downgraded SS)	43.97	

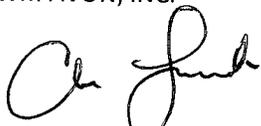
- 3. Please list and describe any equipment additions or facility retrofits planned within the next 12 months, including the following information:**
- Description of planned change and equipment**
 - Estimated implementation date(s) and expected facility closure dates – if applicable**
 - Expected change to facility processing capacity – if applicable**

The Avon MRF is planning for the automation of paper quality control (QC), which is currently performed manually. The project includes the replacement of the manual sort lines with optical sorters to improve separation of OCC, containers, and prohibitives from the paper, leaving a cleaner paper stream. The ejects will be directed to another optical sorter to remove the cardboard. Remaining prohibitives and containers will go to the container line for extraction. This project is intended to improve processing quality, and will not materially increase capacity. WM Avon estimates that this project will occur in Q3 2023. However, timing of this project may be adjusted such that it does not coincide with capacity reductions associated with Casella's MRF retrofit, as the recycling network can ill-afford two MRFs at reduced capacity concurrently.

WM Avon believes the responses above and attached documentation address the requests made in the MassDEP RFI. If you have any questions or require additional information, please contact me at econley@wm.com or 508-513-3516.

Sincerely,

WM AVON, INC.

A handwritten signature in black ink, appearing to read "Chris Lucarelli". The signature is fluid and cursive, with the first name "Chris" and last name "Lucarelli" clearly distinguishable.

Chris Lucarelli

Area Director, Recycling Operations

Attachments

cc: Ed Conley, WM Avon
Brian DesMarais, WM
Peter Richer, WM
Brianna Sacchetti, WM

ATTACHMENT B

CERTIFICATION OF SUBMITTAL (310 CMR 16.07)

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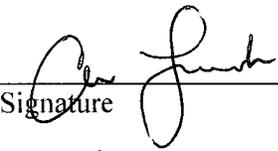
I, Chris Lucarelle, attest under the pains and penalties of perjury that:

(a) I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;

(b) based on my inquiry of those persons responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete;

(c) I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and

(d) I am aware that there are significant penalties, including, but not limited to, possible administrative and civil penalties for submitting false, inaccurate, or incomplete information and possible fines and imprisonment for knowingly submitting false, inaccurate, or incomplete information.

By:  10/31/22
Signature Date
Area Director, Recycling Operations
Title

For: WM Avon, Inc.
Company Name



October 31, 2022

Sent via email: robert.tocchio@mass.gov

Massachusetts Department of Environmental Protection
Solid Waste Management Division
One Winter St
Boston, MA 02108
ATTN: Mr. Robert Tocchio

RE: Request for Documents & Information dated September 29, 2022
WM Billerica Material Recovery Facility, MassDEP Facility ID Number 547092

Dear Mr. Tocchio,

WM Billerica, Inc. d/b/a WM Recycling Billerica (WM Billerica) is providing this letter and attached documentation in response to the Massachusetts Department of Environmental Protection (MassDEP) Request for Documents and Information (RFI) dated September 29, 2022 for our Billerica Material Recycling Facility (MRF). A separate response is made below to each of the requests in the RFI, and each answer is labeled with the number of the request to which it responds.

- 1. Please complete all information in the attached spreadsheet, labeled Attachment C. Note that there is one sheet for calendar year 2021 and a second sheet for January – June 2022. Please fully complete both sheets.**
 - a. Note that the request includes additional information on the type of market outlet for glass, including the amount of glass, in tons, sent to:**
 - i. Bottle production**
 - ii. Fiberglass production**
 - iii. Processed glass aggregate**
 - iv. Daily cover or other landfill-based use**
 - v. Other – (please specify if applicable)**
 - b. For receiving country or state, please list all that apply.**
 - c. If there are other recyclable materials marketed beyond those listed, please use the “Other” rows to add materials and add additional rows if needed.**

WM Billerica completed all requested information on the spreadsheet attached to the RFI. The completed sheets are attached as hardcopy .PDF pages to this letter and Microsoft Excel files are attached to the transmittal email.

- 2. If you accept incoming material other than mixed single stream recyclables, please provide the material type and amount in tons. (e.g., corrugated cardboard, dual stream paper, dual stream containers, etc.)**

Incoming material other than mixed single stream recyclables accepted at the facility in 2021 and January through June 2022 are listed in the table below with their respective tonnage.

Incoming Material	2021 Tons	2022 (Jan-Jun) Tons
Container Stream	535.81	330.60
Dry Waste	89.49	76.33
e-Scrap	72.93	20.72
Glass	149.25	103.32
Mixed Paper	229.76	227.07
OCC	1,390.41	816.89
Residue (Downgraded SS)	35.09	23.99
Steel Cans	19.06	16.74

- 3. Please list and describe any equipment additions or facility retrofits planned within the next 12 months, including the following information:**
- Description of planned change and equipment**
 - Estimated implementation date(s) and expected facility closure dates – if applicable**
 - Expected change to facility processing capacity – if applicable**

WM Billerica completed two independent retrofits at the MRF during the month of September 2022. The first project was to replace the eddy current magnet with a larger unit with a vibratory feeder, and the second was the replacement of paper magnets with DeftAir optical sorters. These improvements increase separation efficiency and improve capture rates, decreasing the amount of recyclable material that ends up as residuals; however, they will have minimal impact on the overall facility capacity.

The upgraded eddy current system is intended to capture the portion of aluminum that was being lost to residue. The design includes a wider belt on a more powerful magnet, and the vibratory feed allows for greater dispersion of material on the belt to distribute aluminum cans more evenly and prevent mid-air collisions that send materials into the incorrect stream.

The replacement of two paper magnets with deft-air optical sorters is an upgrade that will improve separation of flat plastics and metals from the paper stream, and likewise improve separation of three-dimensional paper from the container stream. The former paper magnets proved to be inefficient separating small fiber from containers and was only moderately successful in separating two-dimensional from three-dimensional objects.

WM Billerica is currently in the design phase of a project that would automate the removal of prohibitives and extract the small cardboard from the "overs" in the paper stream after the primary paper screen. We anticipate that the project will occur between Q4 2023 and Q2 2024, and expect very little processing interruption at the MRF from this automation project.

WM Billerica believes the responses above and attached documentation address the requests made in the MassDEP RFI. If you have any questions or require additional information, please contact me at mcampbe8@wm.com or 978-313-0155.

Sincerely,

WM BILLERICA, INC.


Chris Lucarelle
Area Director, Recycling Operations

Attachments

cc: Michael Campbell, WM Billerica
Brian DesMarais, WM
Peter Richer, WM
Stephen Dowaliby, WM

ATTACHMENT B

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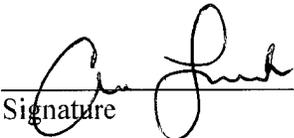
I, Chris Lucarelle, attest under the pains and penalties of perjury that:

(a) I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;

(b) based on my inquiry of those persons responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete;

(c) I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and

(d) I am aware that there are significant penalties, including, but not limited to, possible administrative and civil penalties for submitting false, inaccurate, or incomplete information and possible fines and imprisonment for knowingly submitting false, inaccurate, or incomplete information.

By:  10/31/22
Signature Date

Area Director, Recycling Operations
Title

For: WM Billerica, Inc.
Company Name



October 31, 2022

Sent via email: robert.tocchio@mass.gov

Massachusetts Department of Environmental Protection
Solid Waste Management Division
One Winter St
Boston, MA 02108
ATTN: Mr. Robert Tocchio

RE: Request for Documents & Information dated September 29, 2022
WM/Recycle America Springfield Material Recovery Facility, MassDEP Facility ID Number 380632

Dear Mr. Tocchio,

WM Recycle America, L.L.C. (WMRA) is providing this letter and attached documentation in response to the Massachusetts Department of Environmental Protection (MassDEP) Request for Documents and Information (RFI) dated September 29, 2022 for our Springfield Material Recycling Facility (MRF). A separate response is made below to each of the requests in the RFI, and each answer is labeled with the number of the request to which it responds.

- 1. Please complete all information in the attached spreadsheet, labeled Attachment C. Note that there is one sheet for calendar year 2021 and a second sheet for January – June 2022. Please fully complete both sheets.**
 - a. Note that the request includes additional information on the type of market outlet for glass, including the amount of glass, in tons, sent to:**
 - i. Bottle production**
 - ii. Fiberglass production**
 - iii. Processed glass aggregate**
 - iv. Daily cover or other landfill-based use**
 - v. Other – (please specify if applicable)**
 - b. For receiving country or state, please list all that apply.**
 - c. If there are other recyclable materials marketed beyond those listed, please use the “Other” rows to add materials and add additional rows if needed.**

WMRA completed all requested information on the spreadsheet attached to the RFI. The completed sheets are attached as hardcopy .PDF pages to this letter and Microsoft Excel files are attached to the transmittal email.

2. If you accept incoming material other than mixed single stream recyclables, please provide the material type and amount in tons. (e.g., corrugated cardboard, dual stream paper, dual stream containers, etc.)

Incoming material other than mixed single stream recyclables accepted at the facility in 2021 and January through June 2022 are listed in the table below with their respective tonnage.

Incoming Material	2021 Tons	2022 (Jan-Jun) Tons
Mixed Rigid Plastics - Loose	23.88	
Three Mix Glass	42.36	22.91
Clear Glass	19.03	
Residential Mixed Paper - Loose	11,488.82	5,028.63
Container Stream	7,997.36	3,614.88

3. Please list and describe any equipment additions or facility retrofits planned within the next 12 months, including the following information:
- Description of planned change and equipment
 - Estimated implementation date(s) and expected facility closure dates – if applicable
 - Expected change to facility processing capacity – if applicable

No recent equipment additions or facility retrofits have occurred or are planned at the Springfield MRF within the next 12 months.

WMRA believes the responses above and attached documentation address the requests made in the MassDEP RFI. If you have any questions or require additional information, please contact me at mmoores1@wm.com or 413-747-9294.

Sincerely,

WM RECYCLE AMERICA, L.L.C.


Chris Lucarelle
Area Director, Recycling Operations

Attachments

cc: Michael Moores, WMRA
Brian DesMarais, WM
Peter Richer, WM
Frank Sepiol, WM

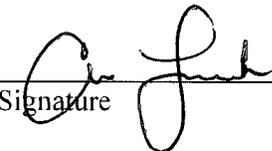
ATTACHMENT B

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I, Chris Lucarelle, attest under the pains and penalties of perjury that:

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- (b) based on my inquiry of those persons responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete;
- (c) I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and
- (d) I am aware that there are significant penalties, including, but not limited to, possible administrative and civil penalties for submitting false, inaccurate, or incomplete information and possible fines and imprisonment for knowingly submitting false, inaccurate, or incomplete information.

By:  10/31/22
Signature Date
Area Director, Recycling Operations
Title

For: WM Recycle America, L.L.C.
Company Name

E. L. HARVEY & SONS, INC.

Industrial and Commercial Waste Removal
Paper Recycling

68 HOPKINTON ROAD • WESTBORO, MASSACHUSETTS 01581-2126

MA DEP

Re your Request please see the
attached documents for
Zero Waste, Rochester, MA.

Zero Waste anticipates no
Equipment additions or changes
at this time.

Regards

Ben Harvey

ATTACHMENT B

CERTIFICATION OF SUBMITTAL (310 CMR 16.07)

Pursuant to 310 CMR 16.07 this certification must be included with your response to the Request for Information

I, Benjamin Harvey, attest under the pains and penalties of perjury that:

(a) I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;

(b) based on my inquiry of those persons responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete;

(c) I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and

(d) I am aware that there are significant penalties, including, but not limited to, possible administrative and civil penalties for submitting false, inaccurate, or incomplete information and possible fines and imprisonment for knowingly submitting false, inaccurate, or incomplete information.

By: Ben Harvey 11/26/2022
Signature Date

VP Govt. Affairs
Title

For: Waste Connections / Zero Waste
Company Name