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, Faul E- Degnam 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.

A A

Title

For:



March 29, 2024

Mr. John Fischer Deputy Director MA-DEP Division of Solid Waste 100 Cambridge Street, Suite 900 Boston, MA 02114

RE: DOCUMENT REQUEST

Dear Mr. Fischer,

Please find attached requested information concerning Casella's Material Recovery Facility, 15 Hardscrabble Road, Auburn, MA. This information includes a "Certification of Submittal" and inbound/outbound material reports for the last two calendar years.

In regard to "any equipment additions or facility retrofits planned within the next 12 months;" the only planned modifications will be to add four automated bunkers to our processing system. These bunkers will hold separated commodities prior to baling and will improve worker safety and efficiency within the operation. It will not affect processing capacity.

Casella Waste Systems prefers that all information provided be kept confidential and not shared with other parties.

Please contact me if there are any questions or clarifications needed after reviewing the information attached. My cell # 978-375-8106.

Sincerely,

Paul E. Degnan

Casella Waste - Auburn MRF

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, Austin McLuitt, 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.

101

April 3, 2024

Mr John Fischer MA-DEP Division of Solid Waste 100 Cambridge St, Suite 900 Boston, MA 02114 John Fischer

RE: RFI Response and Documentation

Dear Mr Fischer:

Please find the attached requested information concerning the Casella MRF in Charlestown MA. This includes the Certification of Submittal and the requested inbound and outbound reports for the years 2022-2023.

The Boston Facility completed a major retrofit in July of 2023, and does not plan on any major retrofits within the next 12 months.

We respectfully request that all the information contained in this submittal remain confidential.

Please don't hesitate to contact me with any questions or if additional clarifications are needed. My cell number is 508-887-0559.

Respectfully submitted,

Market Area Manager

Austin McKnight

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, Beijamin Har vey , 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 7/9/21

Title

Attachment B

Pursuant to 310 CMR 19.011 regarding "Signatories and General Certification. Any application for a permit, authorization to construct, authorization to operate, permit modification, and any determination, certification, report, and any other document submitted to the Department pursuant to 310 CMR 19.000, shall be signed by the appropriate responsible official. Any person required by 310 CMR 19.000 or any order or other enforcement document issued by the Department, to submit any document to the Department shall identify himself or herself by name, profession, and relationship to the applicant and legal interest in the facility, and make the following statements:"

I, <u>Christopher R. Ford</u>, 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 310 CMR: DEPARTMENT OF ENVIRONMENTAL PROTECTION 19.011: continued
- (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:

Christopher R. Ford, MS Environmental Manager Greenworks, LLC

Attachment B

Pursuant to 310 CMR 19.011 regarding "Signatories and General Certification. Any application for a permit, authorization to construct, authorization to operate, permit modification, and any determination, certification, report, and any other document submitted to the Department pursuant to 310 CMR 19.000, shall be signed by the appropriate responsible official. Any person required by 310 CMR 19.000 or any order or other enforcement document issued by the Department, to submit any document to the Department shall identify himself or herself by name, profession, and relationship to the applicant and legal interest in the facility, and make the following statements:"

I, <u>Christopher R. Ford</u>, 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 310 CMR: DEPARTMENT OF ENVIRONMENTAL PROTECTION 19.011: continued
- (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:

Christopher R. Ford, MS Environmental Manager Allied Waste Services of Massachusetts, LLC



Sent via email: joann.e.lai@mass.gov

Massachusetts Department of Environmental Protection Bureau of Air & Waste 100 Cambridge Street, Suite 900 Boston, MA 02114

ATTN: Ms. Joann Lai

RE: Request for Documents & Information dated March 8th 2024

WM Billerica Material Recovery Facility, MassDEP Facility ID Number 547092

Dear Ms. Lai,

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 March 8th 2024 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.

- Please complete all information in the attached spreadsheet, labeled Attachment C. Note that there is one sheet for calendar year 2022 and a second sheet for year 2023. 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.

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 2022 and 2023 are listed in the table below with their respective tonnage.

	Billerica		
Material	2022	2023	Grand Total
Commercial Single Stream	11748.68	11948.83	23697.509
Container Stream	774.09	751.475	1525.565
Dry Waste	152.26	139.1	291.36
E-Scrap	37.51	24.06	61.57
Glass	199.5	201.26	400.76
Mixed Paper	539.8905	609.2605	1149.151
occ	1670.48	2296.26	3966.74
Residue (Downgraded SS)	74.985	25.6695	100.6545
Steel/Tin Cans	55.03	63.41	118.44

Note: Currently all material (excluding e-scrap as it is palletized separately) is combined with Single Stream and processed through the system.

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

The Billerica MRF is planning for a paper polishing automation project that would occur in Q2 2024 for an estimated 10-week period. The project includes the replacement of the manual sort lines with optical sorters to improve separation of OCC, containers, and prohibitives from the paper – thereby creating a cleaner paper stream. The ejects will be directed to another optical sorter to recover the cardboard. Remaining prohibitives and containers will go to the container line for extraction. Additionally, the current aluminum baler will be repurposed to capture film in conjunction with an optical sorter, and two new balers will be installed for PET and aluminum. A subset of this project is to install a push and bale operation to allow the site to bale clean OCC directly instead of running it through the full system. In the first half of the project, limited material will be diverted to other competitor MRFs for processing, while the remainder will continue to be processed at Billerica. In the last half of the project, all inbound material will be fully diverted for processing at Avon and other competitor MRFs. The project will increase overall plant capacity by about 15000 tons of OCC per year due to the installation of the push and bale system.

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 bfosu@wm.com or 508-850-6155.

Sincerely,

WM BILLERICA, INC.

DocuSigned by:

Bernard Fosu 26A6350D84CF45C...

Bernard Fosu

Area Director, Recycling Operations

Attachments

cc: Michael Campbell, WM

Brian DesMarais, WM Peter Richer, WM

Stephen Dowaliby, WM

April 4th, 2024



Sent via email: joann.e.lai@mass.gov

Massachusetts Department of Environmental Protection Bureau of Air & Waste 100 Cambridge Street, Suite 900 Boston, MA 02114

ATTN: Ms. Joann Lai

RE: Request for Documents & Information dated March 8, 2024

WM Avon Material Recovery Facility, MassDEP Facility ID Number 383598

Dear Ms. Lai,

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 March 8, 2024 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.

- Please complete all information in the attached spreadsheet, labeled Attachment C. Note that there is one sheet for calendar year 2022 and a second sheet for year 2023. 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 2022 and 2023 are listed in the table below with their respective tonnage.

	Avon		
Material	2022	2023	Grand Total
Commercial Single Stream	10751.5	11911.9	22663.4
Container Stream	444.5	564.6	1009.1
Film	25.3	15.5	40.8
Mixed Paper	18.2	54.1	72.3
осс	24475.6	25444.9	49920.6
Residue (Downgraded SS)	27.9	17.1	45.0

Note: Currently, all material, except for OCC, is processed as incoming single stream.

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

Two main projects are planned in 2024:

- Completion of outstanding components of the 2023 Avon paper polishing project including the
 addition of a new compressor, a film collection system, and a fire suppression system. Installation
 of these components will not impact daily operations. The compressor upgrade and fire
 suppression upgrade are planned to be completed in Q2 2024. The film extraction system is
 targeted to be completed by end of 2024.
- 2. Construction has begun on a commercial line adjacent to the current Avon MRF location to manage push & bale cardboard and commercial material (to be segregated from the residential line). Commissioning is expected by the end of 2024, and the project will not impact regular operations at the Avon MRF. The project will essentially migrate OCC and commercial single stream processing to the adjacent facility via a commercial line. This will free up the existing Avon MRF capacity for primarily residential single stream processing. Overall, the combined facilities will have an expanded capacity of about 12000 tons per year.

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 bfosu@wm.com or 508-850-6155.

Sincerely,

WM AVON, INC.

DocuSigned by:

BUNAND FOSU
26A6350D84CF45C...

Bernard Fosu

Area Director, Recycling Operations

Attachments

cc: Ed Conley, WM Avon
Brian DesMarais, WM
Peter Richer, WM
Stephen Dowaliby, WM



April 4th, 2024

Sent via email: joann.e.lai@mass.gov

Massachusetts Department of Environmental Protection Bureau of Air & Waste 100 Cambridge Street, Suite 900 Boston, MA 02114

ATTN: Ms. Joann Lai

RE: Request for Documents & Information dated March 8, 2024

WM/Recycle America Springfield Material Recovery Facility, MassDEP Facility ID Number 380632

Dear Ms. Lai,

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 March 8, 2024 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.

- Please complete all information in the attached spreadsheet, labeled Attachment C. Note that there is one sheet for calendar year 2022 and a second sheet for year 2023. 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 RRT 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 2022 and 2023 are listed in the table below with their respective tonnage.

	RRT		
Material	2022	2023	Grand Total
Container Stream	7372.88	7468.87	14841.75
Glass	41.52	38.83	80.35
Mixed Paper	10237.87	10183.63	20421.50
осс	254.59	373.41	628.00

Note: RRT is a dual stream facility.

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

In the next 12 months, WM RRT does not have any equipment additions or facility retrofit planned at this time.

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 bfosu@wm.com or 508-850-6155.

Sincerely,

WM RECYCLE AMERICA, L.L.C.

DocuSigned by:
BUTHARY FOSH
26A6350D84CF45C...

Bernard Fosu

Area Director, Recycling Operations

Attachments

cc: Michael Moores, WM
Brian DesMarais, WM
Peter Richer, WM
Stephen Dowaliby, WM

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, _athat	EDDIE MACHADO, attest under the pains and penalties of perjury
(a)	I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;
	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) 1	I am fully authorized to bind the entity required to submit these documents and to make this attestation on behalf of such entity; and
] i	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.
Ву:	Ellodul 4/8/24 Signature Date
	DISTOR MANDADA

For: New BESTOND WASTE