

Thank you for the opportunity to comment on the RFPs received by DEEP for the CSWS Resource Recovery Facility in Hartford CT.

The success of a recycling or composting program is evaluated by the amount of recovered material that actually is used as a feedstock to make a new product. Substituting recycled material for virgin material has a myriad of environmental benefits – including conservation of natural resources; reductions in water and energy use; reduced emissions to the air, water, and land, including reduction of green house gas emissions.

I have serious concerns about the types of facilities proposed in the RFPs received for the CSWS Resource Recovery Facility in Hartford. Based on case studies and the solid waste literature, mixed waste processing (even if it is post-recycled mixed waste) for recyclables and AD for organics recovered from mixed waste, would result in a decrease in the amount of recycled material ultimately used as a feedstock to make new products and a decrease in organic material that could be used as a soil amendment. They would produce lower quality, less valuable, and in many cases unusable recycled material and unusable compost and would present serious set-backs to Connecticut's recycling and composting programs. In addition, those results would be inconsistent with the goals and solid waste management hierarchy presented in the CT CMMS (Comprehensive Materials Management Strategy). For example:

Composting of organic material recovered from mixed waste:

- AD (anaerobic digestion) of organics from mixed waste will probably result in a non-viable compost product and will basically be a waste-to-fuel process - (not too far removed from WTE (waste-to-energy)).
 - Any digestate produced would most probably be unacceptable for conversion to a soil amendment due to contaminants.
 - **Much better to promote composting (aerobic) of source separated organic material (SSOM) as highest on the hierarchy for organic waste management (after source reduction and reuse).**
 - AD of SSOM should be below aerobic composting and just above WTE on the hierarchy and
 - AD of mixed waste organics should be below AD of SSOM or not even on the hierarchy.

The [EPA non-hazardous SW management hierarchy](#) and the CT SMMS has energy recovery near the bottom of the hierarchy, **Energy recovery is defined by EPA as: “the conversion of non-recyclable waste materials into useable heat, electricity, or fuel through a variety of processes, including combustion, gasification, pyrolyzation, anaerobic digestion, and landfill gas (LFG) recovery.”**

Recovery of recyclables from mixed waste (including post-recycled mixed waste)

- Recovery of recyclables from mixed waste would produce lower quality, less valuable, and in many cases unusable recycled material and unusable compost and would present serious set-backs to Connecticut's recycling and composting programs.
- Facilities should not be designed specifically as mixed waste recycling facilities nor should they be designed as post-recycled mixed waste IPCs.
 - This is a slippery slope to go down – it will cause residents and businesses to not bother separating recyclables - just human nature. Why make the effort if the material will be ultimately recovered?
 - The facilities could be allowed to recover inadvertent recyclables from post recycled mixed waste – but only if the facilities are required to levy significant fines for those mixed waste loads received with designated recyclables with the ultimate requirement that by a specific date mixed loads not be accepted if they contain designated recyclables.
 - Current quality of curbside recyclables and China's cut-off of recyclable material from the US and Europe calls for a higher quality, less contaminated recycled material in order to save recycling programs and keep them viable - this is taking CT in the opposite direction.
 - All current professional solid waste and recycling journal articles and national recycling organizations are calling for increased quality of materials recovered for recycling in order to keep recycling viable. Promoting recovery of recyclables from mixed waste (including post-recycled waste) undermines recycling viability.

Recovering recyclables from mixed waste (including post-recycled waste) and mixed waste composting are inconsistent with Connecticut's recycling goals and solid waste management hierarchy and would destroy the viability of composting and recycling programs in CT.

Thank you,
Judy Belaval
Wallingford CT