



## Bristol Resource Recovery Facility Operating Committee

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*Town of Berlin*

March 5, 2020

*Town of Branford*

Environment Committee  
Legislative Office Building, Room 3200  
Hartford, CT 06106

*City of Bristol*

*Town of Burlington*

SUBJECT: Raised Bill SB 11

*Town of Hartland*

Co-Chairs Cohen and Demicco, Vice Chairs Kushner and Gresko, Ranking Members  
Harding and Miner, and members of the Committee:

*City of New Britain*

*Town of Plainville*

As Executive Director of the Bristol Resource Recovery Facility Operating  
Committee, I submit these comments on behalf of the 14-town regional agency  
comprised of fourteen cities and towns which collectively manage municipal solid  
waste through contractual arrangements with Covanta Bristol, Inc., with the origin of  
the project dating back to the mid 1980's.

*Town of Plymouth*

*Town of Prospect*

*Town of Seymour*

Connecticut is facing a crisis in how cities and towns manage solid waste and  
recyclables. There are numerous suggestions as to how to avoid a worst case scenario,  
where transport of waste to out of state landfills increases exponentially. The  
consequences of insufficient in-state capacity have been reported publicly for several  
years – increased truck traffic, greenhouse gas emissions, and a significant increase in  
costs. Connecticut has already experienced the early stages of this crisis, and  
municipalities have seen costs for managing waste and recyclables skyrocket, with no  
relief expected in the near future.

*Town of Southington*

*Town of Warren*

*Town of Washington*

*Town of Wolcott*

In the past decade, revenues resulting from the sale of electricity dropped  
precipitously as power purchase agreements came to end of term. An increase in  
revenues from the sale of electricity and/or Class II renewable energy credits is in the  
best interests of Connecticut's residents, and necessary to prevent further erosion of  
in-state capacity. With regard to SB 11 Section 2(g), ideally, waste to energy facilities  
would be eligible to participate in power purchase agreements based upon the need to  
sustain existing infrastructure for managing waste. Our organization also recommends  
the Environment Committee introduce legislation similar to last year's HB 5381,  
which would offer the opportunity for waste to energy facilities to enhance revenues  
with Class II renewable energy credits, which are necessary to maintain a high degree  
of availability and minimize disruptions associated with outages. We have had  
extensive conversations with the Department of Energy & Environmental Protection  
to advocate for support of this approach. It is vital that legislators and state officials  
understand how such disruptions impact customers who rely on dependable,  
uninterrupted service for disposal of solid waste.

Regarding the proposed approach outlined in SB 11 (LCO 678), it is unclear to us as to how the bill will stimulate building a more robust infrastructure in Connecticut for managing waste and recyclables. The proposed *Waste Reduction and Infrastructure Development Program* may require a significant level of DEEP resources over a period of years, while the Department has widely expressed concern about the pending departure of experienced, senior level staff by 2022. Further, the time for the proposed DEEP effort to mature and effect meaningful change will be inadequate to cope with the looming constriction in capacity for managing materials within the state.

We therefore recommend the Committee consider revisions to the proposed Section 2(c), such that Operating Committees would be safeguarded from any unilateral action by the Department without the express approval of the member communities prior to considering a proposal as described in Sections 2(a) and 2(b). Regional agencies are able to conduct procurement efforts better suited to the needs of their constituents, and have the ability to expedite such efforts without extraordinary delays which might arise from the multiple parties designated in SB 11 to evaluate proposals to be issued by DEEP.

In conclusion, we welcome the opportunity to discuss these recommendations with members of the Environment Committee and others, and we appreciate your consideration of these suggestions.

Sincerely

*Mark H. Bobman*

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Mark H. Bobman  
Executive Director

cc: Member communities of the BRRFOC