



Reworld Hempstead Company
600 Merchants Concourse
Westbury, NY 11590
516.683.5400

February 25, 2025

Mr. Benazir Khan
Division of Materials Management
NYS Department of Environmental Conservation
SUNY @ Stony Brook
50 Circle Road
Stony Brook, NY 11790

RE: Solid Waste Incinerator Annual Report for 2024
Hempstead Resource Recovery Facility

Dear Mr. Khan:

Enclosed please find the Solid Waste Incinerator Annual Report for the Hempstead Resource Recovery Facility for calendar year 2024. During 2024, we processed all acceptable waste delivered to the facility except untreatable wastes, such as bulky items, which were separated from the incoming waste stream and removed from the facility for proper processing and disposal.

In addition, there were 19 incoming vehicles that set off the radiation detector at the scalehouse in 2024. On each occasion, the vehicle was either returned to the generator or hauler (residential waste) or was parked on site and allowed to naturally decay before being processed at the facility (commercial waste). Reworld personnel also notified the Department of each occurrence. A more detailed summary of the radioactive loads is provided as Attachment 1.

Also enclosed is a summary report of the annual facility inspection required by 6 NYCRR Part 360-3.3(h)(6) (Attachment 2) as well as updated financial assurance document as per section 12 of the report (Attachment 3).

Finally, turbine steam consumption in the enclosed report is a calculated figure since it is not recorded. It is assumed that all steam produced goes to the turbine unless the turbine is off-line for one hour or more. In 2024, the turbine was off-line for about 0.3 hours for maintenance and testing.

If you have any questions or require additional information, feel free to contact me at (516) 683-5438 or khaque@Reworldwaste.com.

Sincerely,



Kamrun Haque
Environmental Program Manager

cc: NYSDEC Central Office (via e-mail)
F. Gay, NYSDEC – Region 1 (via e-mail)



COMBUSTION AND THERMAL TREATMENT FACILITY ANNUAL/QUARTERLY REPORT

Submit the Annual Report no later than March 1, 2025.

A. This annual/quarterly is for the year of operation from January 01, 2024 to December 31, 2024

B. Quarterly Report for: Quarter 1 Quarter 2 Quarter 3 Quarter 4

SECTION 1 – FACILITY INFORMATION

Facility Information form with sections: FACILITY INFORMATION, OWNER INFORMATION, OPERATOR INFORMATION, PREFERENCES. Includes fields for facility name, address, contact info, permit numbers, and correspondence preferences.

Did you operate in 2024? Yes; Complete this form. No; Complete and submit Sections 1 and 16. If you no longer plan to operate and wish to relinquish your permit/registration associated with this solid waste management activity, also complete the "Inactive Solid Waste Management Facility or Activity Notification Form" located at: https://extapps.dec.ny.gov/docs/materials_minerals_pdf/inactiveswmf.pdf

SECTION 2 - SOLID WASTE RECEIVED/PROCESSED

Provide the tonnages of solid waste received. DO NOT REPORT IN CUBIC YARDS!

Specify the methods used to measure the quantities received and the percentages measured by each method

_____% Scale Weight _____% Estimated
 _____% Truck Count _____% Other (Specify: _____)

Type of Solid Waste	January (tons)	February (tons)	March (tons)	April (tons)	May (tons)	June (tons)	July (tons)
Construction & Demolition Debris							
Industrial Waste (Including Industrial Process Sludges)							
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)							
Sewage Treatment Plant Sludge							
Treated Regulated Medical Waste							
Emergency Authorization Waste (Storm Debris)							
Other (specify)							
Total Tons Received							
Total Tons Processed							

SECTION 2 - SOLID WASTE RECEIVED/PROCESSED (continued)

Type of Solid Waste	Tip Fee (\$/ton)	August (tons)	September (tons)	October (tons)	November (tons)	December (tons)	Total Year (tons)	Daily Avg. (tons)
Construction & Demolition Debris								
Industrial Waste (Including Industrial Process Sludges)								
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)								
Sewage Treatment Plant Sludge								
Treated Regulated Medical Waste								
Emergency Authorization Waste (Storm Debris)								
Other (specify)								
Total Tons Received								
Total Tons Processed								

SECTION 3 – SERVICE AREA OF SOLID WASTE RECEIVED

Please identify where the waste is coming from. The total tons received reported below should equal the total tons received in Section 2 (Solid Waste Received/Processed). **DO NOT REPORT IN CUBIC YARDS!**

- If the waste **WAS** received from another solid waste management facility, please write in the name *and address* of the facility along with the appropriate state, county and planning unit/municipality.
- If the waste **WAS NOT** received from another solid waste management facility, please write in “**Direct Haul**” along with the appropriate state, county and planning unit/municipality where the waste was generated.

Specify transport method and percentages of total waste transported by each:

_____ % Road _____ % Rail _____ % Water _____ % Other (specify: _____)

Explain which waste types and service areas below are included in these transport methods _____

SERVICE AREA OF SOLID WASTE RECEIVED					
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR “Direct Haul”	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT <small>(See Attached List of NYS Planning Units)</small>	TONS RECEIVED
Construction & Demolition Debris					
Industrial Waste (Including Industrial Process Sludges)					

SERVICE AREA OF SOLID WASTE RECEIVED						
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul"	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units)	TONS RECEIVED	
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)	Town of Hempstead	NY	Nassau	Hempstead	432,174.67	
	Village of Rockville Center	NY	Nassau	Hempstead	12,515.46	
	Village of Garden City	NY	Nassau	Hempstead	13,493.67	
	Village of Lynbrook Transfer Station	NY	Nassau	Hempstead	8,970.42	
	Village of Freeport	NY	Suffolk	Freeport	17,375.39	
	North Hempstead	NY	Nassau	Hempstead	103,440.62	
	Brookhaven Transfer Station, Yaphank	NY	Suffolk	Brookhaven	222,175.61	
	Direct Haul (Commercial)	NY	Nassau / NYC	Various	84,851.68	
	Regal Transfer Station	NY	Bronx/Queens	NYC	46.70	
	Pennisula Recycling	NY	Suffolk	Freeport	6,911.06	
	Jamaica Ash Transfer Station	NY	Nassau	Hempstead	12,583.84	
	National Waste	NY	NYC	NYC	22,792.49	
	Omni	NY	NYC	NYC	1,032.79	
	Winters Brothers Transfer Station	NY	Nassau/Suffolk	Nassau/Suffolk	32,078.00	
	Covanta MacArthur	NY	Suffolk	Suffolk	2,960.13	
	American Recycling	NY			21,543.58	
	Maggio	NY			1,397.32	
	Royal	NY			4,175.30	

SERVICE AREA OF SOLID WASTE RECEIVED					
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul"	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units)	TONS RECEIVED
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)					
Sewage Treatment Plant Sludge					
Treated Regulated Medical Waste (TRMW)*					
Emergency Authorization Waste (Storm Debris)					
Other (specify)					
TOTAL RECEIVED (tons):					_____

Part 360 Permit Limit (tpy) _____

Permit Limit based on Steaming rate (tpy) _____

* List generators that provide you Certificates of Treatment forms and quantities of TRMW from each _____

SECTION 4 – PLANT PERFORMANCE LOG

Complete the following Annual/Quarterly Plant Performance Log:

PLANT PERFORMANCE LOG ANNUAL/QUARTERLY SUMMARY

Processible Waste Bypassed (Tons): _____

Untreatable Waste Bypassed (Tons): _____

Incinerator #1 Operations (Hours): _____

Incinerator #2 Operations (Hours): _____

Incinerator #3 Operations (Hours): _____

Incinerator #4 Operations (Hours): _____

Steam Generated (Klbs): _____

Steam Sold (Klbs): _____

Turbine Operation (Hours): _____

Turbine Steam Consumption (Klbs): _____

Power Generation (MWH): _____

Purchased Power (MWH): _____

Annual Electricity Sold to User (MWH): _____

Ash Residue (Tons): _____

Volatile Matter in Ash (%): _____

Ferrous Metal Recovered (Tons): _____

Ferrous Metal Sold (Tons): _____

Non-ferrous Metal Recovered (Tons): _____

Non-ferrous Metal Sold (Tons): _____

Water Consumption (Kgal): _____

<u>Facility's Size</u>	<u>Operations</u>
Number of Units Installed: _____	Facility is in production: _____
Nominal rated capacity of each unit: _____	Hours per day: _____
	Days per week: _____
	Days per year: _____

Hours of Downtime	Unit #1	Unit #2	Unit #3	Unit #4	Total
Scheduled Maintenance	_____	_____	_____	_____	_____
Unscheduled Maintenance	_____	_____	_____	_____	_____
Total	_____	_____	_____	_____	_____
Availability (%)	_____	_____	_____	_____	_____

SECTION 5 – TRANSFER OR DISPOSAL DESTINATION

Identify the transfer or disposal destination of waste removed by indicating the name of the transfer or disposal facility, the type of solid waste transferred, the corresponding State/Country, the County/Province, the NYS Planning Unit of the transfer or disposal destination facility, and the amount transferred or disposed or used as alternative operating cover (AOC) at each destination. This only includes waste sent off-site for disposal, not metal recovered reported in Section 6.

Refer to the list of NYS Planning Units that can be found at the end of this report. DO NOT REPORT IN CUBIC YARDS!

Transport (specify percentages):

_____ % Road

_____ % Rail

_____ % Water

_____ % Other (specify: _____)

Explain which waste types and service areas below are included in these transport methods _____

TRANSFER OR DISPOSAL DESTINATION								
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY TO WHICH IT WAS SENT <i>(Name & Address)</i>	DESTINATION STATE OR COUNTRY	DESTINATION COUNTY OR PROVINCE	DESTINATION NYS PLANNING UNIT <i>(See Attached List of NYS Planning Units)</i>	AMOUNT TO TRANSFER DESTINATION (TONS)	AMOUNT TO DISPOSAL DESTINATION (TONS)	AMOUNT USED AS AOC (TONS)	TOTAL YEAR (TONS)
Ash (MSW Energy Recovery)								
Bypass								
Emergency Authorization Waste (Storm Debris)								
Other <i>(specify)</i>								
TOTAL SENT (tons): _____								

SECTION 6 – METAL RECOVERED

Provide the tonnages of metal recovered from the mixed solid waste stream. Identify the location or solid waste management facility to which the recovered metal was sent from your facility, by indicating the name of the facility, the type of metal recovered, the corresponding State/Country, the County/Province, the NYS Planning Unit, and the amount recovered. **Refer to the list of NYS Planning Units that can be found at the end of this report.** DO NOT REPORT IN CUBIC YARDS!

Transport (specify percentages):

_____ % Road _____ % Rail
 _____ % Water _____ % Other (specify: _____)

Explain which waste types and service areas are in these transport methods _____

METAL RECOVERED FOR REUSE/RECYCLING					
METAL RECOVERED	DESTINATION <small>(Name & Address)</small>	DESTINATION STATE OR COUNTRY	DESTINATION COUNTY OR PROVINCE	DESTINATION NYS PLANNING UNIT <small>(See Attached List of NYS Planning Units)</small>	TONS RECOVERED <small>(out of facility)</small>
Ferrous Metal					
Non-ferrous Metal					
Other Metal (specify)					
TOTAL METAL RECOVERED (tons):					

SECTION 7 - FIRE AND SAFETY INCIDENTS

Provide a summary of the time, date, and details of any incidents which required the implementation of the contingency plan.

SECTION 8 - BUDGET

Provide an annual income and expense statement providing details on the major accounting items and operating and maintenance costs.

Rerworld Hempstead Co. elects to not provide annual income, budgets, maintenance costs, tipping fees etc. since it is considered business confidential. Publication of this information could compromise Rerworld Hempstead's competitiveness

SECTION 9 - INSPECTIONS

Provide a copy of the annual facility inspection report conducted and stamped by a professional engineer licensed to practice in New York State.

SECTION 10 - GOALS

Provide a narrative of the goals and objectives to be attained in the next future calendar year and any major repairs or renovations proposed.

Rerworld Hempstead's goal is to continue to operate the facility in a safe, efficient, and environmentally sound manner- converting waste to non-hazardous ash residue and recyclable metal (both ferrous and non-ferrous) while generating electricity for use and sale. Through technology and research the facility continuously improving metals recovery operations, as wel as determining how our ash residue can be recycled.

SECTION 11 – UNAUTHORIZED SOLID WASTE

Has unauthorized solid waste been received at the facility during the reporting period?

Yes No If yes, give information below for each incident (attach additional sheets if necessary):

Date Received	Type Received	Date Disposed	Disposal Method & Location

Radiation Monitoring

Does your facility use a fixed radiation monitor? ____ Yes ____ No

Identify Manufacturer _____ and Model _____ of fixed unit.

Does your facility use a portable radiation monitor? ____ Yes ____ No

Identify Manufacturer _____ and Model _____ of fixed unit.

If the radiation monitors been triggered give information below for each incident:

Incident Number	Received		Hauler	Origin	Truck Number	Reading	Disposal Status	Removed	
	Date	Time						Date	Time

SECTION 12 - COST ESTIMATES AND FINANCIAL ASSURANCE DOCUMENTS

Are there required cost estimates and financial assurance documents for closure?

Yes No If yes, attach additional sheets reflecting annual adjustments for inflation and any changes to the Closure Plan?

SEE ATTACHMENT 3

SECTION 13 – PROBLEMS

Were any problems encountered during the reporting period (e.g., specific occurrences which have led to changes in facility procedures)?

Yes No If yes, attach additional sheets identifying each problem and the methods for resolution of the problem.

SECTION 14 – CHANGES

Were there any changes from approved reports, plans, specifications, and permit conditions?

Yes No If yes, attach additional sheets identifying changes with a justification for each change.

SECTION 15 - PERMIT/CONSENT ORDER REPORTING REQUIREMENTS

Are there any additional permit/consent order reporting requirements not covered by the previous sections of this form?

Yes No If yes, attach additional sheets identifying the reporting requirements with their respective responses.

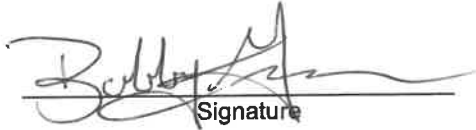
SECTION 16 - SIGNATURE AND DATE BY OWNER OR OPERATOR

Owner or Operator must sign, date and submit one completed form to the appropriate Regional Office (See attachment for Regional Office addresses, email addresses and Materials Management Contacts.)

The Owner or Operator must also submit one copy by email, fax or mail to:

**New York State Department of Environmental Conservation
Division of Materials Management
Bureau of Solid Waste Management
625 Broadway
Albany, New York 12233-7260
Fax 518-402-9041
Email address: SWMFannualreport@dec.ny.gov**

I certify, under penalty of law, that the data and other information identified in this report have been prepared under my direction and supervision in compliance with a system designed to ensure that qualified personnel properly and accurately gather and evaluate this information. I am aware that any false statement I make in such report is punishable pursuant to section 71-2703(2) of the Environmental Conservation Law and section 210.45 of the Penal Law.


Signature

02-25-2025
Date

Bobby Green
Name (Print or Type)

Facility Manager
Title (Print or Type)

BGreen@reworldwaste.com
Email (Print or Type)

600 Merchants Concourse
Address

Westbury
City

NY 11590
State and Zip

(516) 683-5400
Phone Number

ATTACHMENTS: YES NO
(Please check appropriate line)

Attachment 1

Hempstead Resource Recovery Facility - 2024 Radioactive Load Summary

Number	Received		Hauler	Origin	Reading mrem/hr	Disposal	Removal		
	Date	Time					Date	Time (est.)	
1	1/13/2024	3:00	National Waste Services	Hempstead	0.248	Removed from site after driver refused to leave truck for decay, returned to original facility.	1/16/2024	7:54	Q1
2	2/16/2024	9:53	Village of Floral Park	Floral Park	0.805	Removed from site after driver refused to leave truck for decay, returned to original facility.	2/21/2024	13:42	
3	2/16/2024	10:20	Village of Floral Park	Floral Park	0.079	Removed from site after driver refused to leave truck for decay, returned to original facility.	2/16/2024	11:19	
4	2/19/2024	5:37	National Waste Services	Bay Shore	0.113	Removed from site after driver refused to leave truck for decay, returned to original facility.	2/21/2024	13:00	
5	5/13/2024	13:45	Village of Rockville Center	Rockville Center	0.151	Removed from site after driver refused to leave truck for decay, returned to original facility.	5/13/2024	15:07	Q2
6	6/10/2024	11:15	Sanitation District 2	Hempstead	0.044	Removed from site after driver refused to leave truck for decay, returned to original facility.	6/10/2024	11:25	
7	6/18/2024	9:30	Village of Hempstead	Hempstead	0.0963	Removed from site after driver refused to leave truck for decay, returned to original facility.	6/18/2024	9:45	
8	6/20/2024	9:57	Village of Hempstead	Hempstead	0.0568	Removed from site after driver refused to leave truck for decay, returned to original facility.	6/20/2024	10:15	
9	6/28/2024	10:40	Town of Hempstead	Hempstead	0.135	Removed from site after driver refused to leave truck for decay, returned to original facility.	6/28/2024	10:55	
10	7/30/2024	12:30	Alpha Carting	Village of Freeport	5.52	Removed from site after driver refused to leave truck for decay, returned to original facility.	7/30/2024	12:45	Q3
11	8/23/2024	12:14	Merrck Transfer Station	Merrick	0.168	Truck left onsite for decay. Waste disposed on Monday 8/26 after the rescans were clear and no alarm on scale.	8/26/2024	7:41	
12	9/10/2024	8:56	Winter Bros	west babylon	0.0937	Removed from site after driver refused to leave truck for decay, returned to original facility.	9/10/2024	14:57	
13	10/7/2024	7:00	Village of Rockville Center	Rockville Center	0.084	Removed from site after driver refused to leave truck for decay, returned to original facility.	10/7/2024	11:00	Q4
14	10/17/2024	9:17	Sanitation District 2	Hempstead	0.151	Removed from site after driver refused to leave truck for decay, returned to original facility.	10/17/2024	14:30	
15	11/15/2024	12:03	American Recycling	Jamaica	0.0324	Removed from site after driver refused to leave truck for decay, returned to original facility.	11/15/2024	14:00	
16	11/18/2024	6:56	Village of Rockville Center	Rockville Center	0.299	Removed from site after driver refused to leave truck for decay, returned to original facility.	11/18/2024	12:00	
17	11/29/2024	5:37	Avid Waste System	Middle Village	0.202	Removed from site after driver refused to leave truck for decay, returned to original facility.	11/29/2024	11:00	
18	12/12/2024	6:18	National Waste Services	Bay Shore	0.033	Removed from site after driver refused to leave truck for decay, returned to original facility.	12/12/2024	10:00	
19	12/20/2024	7:59	Sanitation District 2	Hempstead	0.174	Removed from site after driver refused to leave truck for decay, returned to original facility.	12/20/2024	13:18	

ATTACHMENT 2

2024 ANNUAL SOLID WASTE REPORT
HEMPSTEAD RESOURCE RECOVERY FACILITY

2024 ANNUAL FACILITY INSPECTION REPORT

**HEMPSTEAD RESOURCE RECOVERY FACILITY
2024 ANNUAL FACILITY INSPECTION REPORT**

By Kenneth E. Armellino, P.E. - #075733

February 25, 2025

Signed: *Kenneth E. Armellino* Date: 2/25/25



2/25/25 Rev. 1

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1 INTRODUCTION

The New York State Department of Environmental Conservation (NYSDEC), Division of Solid Waste, 6 NYCRR Part 360 Solid Waste Management Facilities, Subpart 360-3, SOLID WASTE INCINERATORS OR REFUSE-DERIVED FUEL PROCESSING FACILITIES OR SOLID WASTE PYROLYSIS UNITS, paragraph 360-3.3(h)(6) states:

(6) At least annually, a general facility inspection must be undertaken to determine the operating condition of the safety, emergency, security, process, and control equipment. This annual inspection must be performed under the direction of an individual licensed to practice engineering in the State of New York. This individual must prepare a summary report of the inspection which must be submitted to the department's central office and the office of the department administering the region within which the facility is located, as part of the annual facility report (see paragraph 360-3.4(f)(3) of this Part).

This requirement is part of the Solid Waste Permit to Operate #1-2820-01727/00031 (exp. 12/1/20) for the Hempstead Resource Recovery Facility, located at 600 Merchants Concourse, Westbury, NY 11590, owned and operated by Reworld™ Hempstead, Inc. (formerly Covanta, Inc.) As per the Administrative Procedures Act since a timely renewal application was submitted and deemed complete with comments received on 6/1/2020 the facility is allowed to continue operating. Permit status remains same as the previous year as no update has been received from the NYSDEC. This report covers the operation and inspection for the year 2024. The inspection and report were carried out by Kenneth E. Armellino, a licensed Professional Engineer in the State of New York (# 075733) and Director - Permitting for Reworld™, Inc. (formerly Covanta, Inc.) located at 445 South St., Morristown, NJ 07960. The site inspection and conclusions are based on a review of compliance with company technical standards, as well as a final inspection and document review on December 4, 2024. The site inspection and data review included the assistance of Rommel Villanueva Facility Maintenance Manager, Brian Aerne, Environmental Area Manager, and Kamrun Haque, Facility Environmental Specialist. Information was provided by various other employees as necessary.

2 OBJECTIVE

The objective of this summary report is to document the annual general inspection to determine the operating condition of the specified plant equipment. This summary report is grouped into the following four sections:

1. Safety and emergency equipment.
2. Security equipment.

3. Process & control equipment, i.e. refuse boilers/stokers, air pollution control equipment, turbine and residue and auxiliary systems.
4. Preventive maintenance management system.

3 FINDINGS

The operating condition of the safety, emergency, security, process and control equipment at the Reworld™ Hempstead facility, as summarized in the following paragraphs, was found to be acceptable.

3.1 Safety & Emergency Equipment

3.1.1 Fire Protection

All observed fire protection equipment (alarms, pumps, valves, extinguishers, etc.) was found to be in proper alignment, in acceptable condition and undergoing quarterly and annual inspections and tests by certified contractors and insurance inspectors, or site personnel, as required. Most fire extinguisher stations throughout the plant are protected by removable covers. The annual Fire Pump was tested by AIG and its contractors in 2024. Upgraded fire protection systems for the tipping floor and refuse pit have been installed and are operational. This includes new monitoring systems in the control room for the tipping floor, and remote water cannons for the east and west cranes. Main fire alarm control panel was upgraded this year. The installation of front auxiliary burner fire sprinklers was underway at the time of the inspection.

3.1.2 Safety Valves

The boiler steam safety valves observed were found to be in acceptable condition. Documentation indicating annual maintenance and in-situ testing by facility personnel and certified contractors is up to date. Balance of plant safety valves also appear to be properly maintained. Deaerator safety valves were tested in place by a contractor. All were found to be in compliance with company technical standards and generally accepted industry practices.

3.1.3 Self-Contained Breathing Apparatus

Ten minute escape hoods are stored in several areas throughout the plant site. Facility safety personnel inspect the devices on a regular basis as part of a PM work order.

3.1.4 Personal Protective Equipment

Employees and contractors use hard hats, steel toe boots, uniforms, and hearing and eye protection. Workers, as required, were observed to use appropriate breathing protection/respirators. Additional personal protective equipment, when required, is available for specific tasks. All areas inspected were neat and clean, i.e. free from tripping or slipping hazards. Overall housekeeping is above average.

3.1.5 Eyewash & Shower Stations

Emergency eyewash and shower stations, randomly inspected, were found to be in satisfactory condition. Facility personnel on a regular basis inspect emergency eyewash/shower station integrity. Portable eyewash stations have water changed/treated as required.

3.1.6 Lightning Protection

The lightning protection system appeared to be in fairly good condition with on-going maintenance in progress. The annual inspection was conducted in 2024 and routine repair activities are performed by in-house technician staff. The facility is continually assessing the adequacy of the lightning protection systems and making upgrades as determined necessary.

3.1.7 Radiation Detection

Radiation detection monitors are installed at the three inbound refuse scales are operational. The facility operates three monitors (Ludlum 375-P-100) which were installed in 2017 and have up to date calibrations. The facility purchased a FLIR 200 (Teledyne Brand) handheld detector capable of reading radiation levels as well as identify isotopes. This is kept in the shift supervisor's office. This device is used to determine radioactivity levels and to monitor radioactive loads when parked on site for decay; the scale detectors are used to determine whether a load is acceptable for disposal. The facility is currently working with regulators to revise the way identified radioactive loads are reported and handled. An updated radiation plan was submitted to the agency and is pending approval, along with the solid waste permit. A fourth scale radiation detector is installed on outbound Scale 5 and is in operation and calibrated.

3.2 Security Equipment

3.2.1 Fencing

The facility perimeter fencing was observed to be free from breaks and in acceptable condition at all locations.

3.2.2 Entrance Gates

The main entrance and exit gates are operational. The truck/visitor gate is manned 24/7 from Sunday 10:00 a.m. to Saturday 6 p.m. by security personnel. The truck gate is manually closed and locked during non-waste delivery hours. The facility is equipped with a security system with a keycard system for access to the site as well as various areas within the facility. An Administration Building Security System is in place with door monitoring, buzzer entry and electronic lock systems. A sign with specified regulatory wording is installed at the Facility entrance.

3.2.3 Security Cameras

The facility perimeter as well as several exterior and interior areas is monitored 24 hours a day, 7 days a week by a digital camera system that is capable of recording more than a weeks worth of images. This system can be accessed by authorized

facility personnel via the internet or the facility's internal network. Display monitors for the system are in the facility control room and are observed regularly by the control room operator. A camera was added to the refuse pit location to observe pit management activities and waste feeding. Upgrades to the fire protection system in 2020 resulted in the addition of multiple security cameras as well. In 2023 the server was upgraded to allow for increased storage.

3.3 Process & Control Equipment

3.3.1 Boiler/Stoker

During the inspection, all 3 boilers were in service. Comments on operating statistics are based on full year data January 2024 through December 2024 inclusive.

3.3.1.1 Boiler/Stoker Performance

3.3.1.1.1 Boiler Heat Output/Losses

Based upon annual operating data and current operating conditions, the three units continue to generate steam within permitted levels. The facility is operating at steam conditions which approximate design levels. Review of economizer exit flue gas temperatures and boiler draft losses indicate an efficient, acceptable boiler operating condition. Observed residue quality was good without excessive unburned material.

3.3.1.1.2 Availability

The annual boiler operating availability for 2024 was 95.6%. This availability level is indicative of the facility's excellent maintenance and operations practices but does reflect higher than normal downtime for major scheduled outage activities.

3.3.1.1.3 Refuse Processing

Refuse processed for the entire year of 2024 was 1,023,703 tons. The plant processed all the acceptable waste that was delivered. Rejected waste consisted of 285.7 tons of bulkies and other non-processible waste. No acceptable waste was bypassed.

3.3.1.1.4 Energy Recovery

The annual plant average gross energy recovery ratio in 2024 was 654.0 kWh/ton of refuse processed. In total the facility's gross generation was 669,510 megawatts in 2024.

3.3.1.2 Boiler/Stoker Critical Control Loops

Critical control functions of the boiler, furnace draft control and boiler drum level control, were being monitored. These parameters were observed to be controlled automatically with stable results. All 3 boilers were observed to be operating in auto/cascade mode.

Note that instrument inputs associated with critical control loops and essential operating data are calibrated regularly. Informative, redundant and local instrumentation are calibrated only on an as-needed basis.

3.3.1.3 Boiler/Stoker Mechanical

3.3.1.3.1 Boiler Tube Failures

The plant is primarily managing tube corrosion by replacing pressure parts as dictated by tube wastage and UT surveys. Outage Condition Assessment Reports developed by the Facility and Regional Engineering staff are an excellent source for reviewing detailed boiler repair scopes and developing recommendations for repairs. Based on these reports, the preventative programs in place, and the facility's overall availability, boiler tube failures appear to satisfactorily managed and addressed.

3.3.1.3.2 Fans & Dampers

All ID, primary and secondary combustion air fans were operating normally with no obvious noise or excessive vibration alarms. Fan/motor vibration levels are monitored regularly by facility operators on rounds, and during preventive maintenance. Combustion air preheaters at the facility allow the facility to deal better with variable waste conditions, as well as reduce the need to use auxiliary fuel. All 3 fans are equipped with a variable frequency drive (VFD).

3.3.1.3.3 Boiler/Grates Miscellaneous

1. Feed rams and grate drives were observed to be operating properly.
2. Boiler areas were generally clean and free of debris.
3. Lighting and labels remain excellent throughout the boiler building. Lighting improvement efforts continued during 2023 to gradually change all lighting to 100% LED.
4. All 3 units had roller grate repair and or replacements, focused mostly on the lower 3 roller grates in each unit during outages.
5. Roller grate drives utilize variable frequency drives to allow for better bed control.
6. Currently all five cooling tower cells (Cells #0 to #4) are in service.
7. Refuse scales #1 and #2 were replaced in 2019 with upgrades to better withstand the conditions in which they operate.

3.3.2 Turbine

No oil leaks were observed and vibration indications were all normal. Turbine availability was 99.73% in 2024. The unit is online and operating satisfactorily. An enhanced monitoring protocol is in place, and a comprehensive overhaul is scheduled for 2026 which will include installing a new control system, replacing the stator, rewinding the generator field and repairing the rotors and blades of the turbine.

3.3.3 Air Pollution Control (APC) Equipment

3.3.3.1 APC Operating Data & Stack Emissions

A review of CEMS Exceedance data as well as the facility's CEMS compliance record for 2024 indicates the air pollution control system to be performing well. The facility

tracks environmental excursions, root cause for the excursions and targets areas for improvement in environmental performance.

Review of operating data showed that scrubber and baghouse draft losses for the three units are being maintained at acceptable levels implying that the flue gas paths are being maintained in an acceptably clean condition.

In addition, a new CEM system was installed, and was certified in July 2016 and approved by the Department in September 2016. The system, which utilizes an extraction sampling method, was officially placed into service for compliance purposes on October 1, 2016. In 2022 a new CEMS server was installed, including upgrades from the obsolete CPP data processors to PLCs.

A renewed Title V operating permit for the facility was issued in July of 2016, and expired on July 12, 2021. The permit contained minor modifications to the facility's CEMS limits. Title V renewal application was submitted and completeness received on December 28, 2020, which allows the facility to continue to operate.

3.3.3.2 APC Critical Control Loops

Critical control functions of the air pollution control system were reviewed. Lime slurry delivery rate as a function of SO₂ removal efficiency, with a minimum flow are the critical control parameters. The lime slurry control loop is functional. SO₂ removal and scrubber outlet temperature control were observed to be functional and stable. The facility continues to review the minimum reagent levels during stack testing.

3.3.3.3 APC Miscellaneous

Air pollution control system observations are as follows:

1. All SDA and baghouse discharge valves & all screw conveyors were functioning.
2. Baghouse bag replacement continues as dictated by bag age and wear. Baghouse numbers 2 and 3 were re-bagged in 2020. Baghouse 1 was re-bagged in February 2022. Baghouse 3 was re-bagged in 2024. All baghouse controls have been upgraded since 2021.
3. The facility has demonstrated good performance with all of the bags in the baghouse embedded with a PTFE membrane material.
4. Insulation appeared to be in sound condition, with ductwork expansion joints neatly insulated with insulation jackets.
5. The urea system appeared to be in acceptable condition, with no evidence of urea leakage detectable.
6. Unit # 1 scrubber pre-cyclone cone was replaced during the unit's outage.
7. The scrubber deck area was completely refurbished in 2018, including the expansion of grate areas to allow for safer work and easier accessibility. Steel flooring and other elements were replaced with corrosion resistant fiberglass. The solid flooring in this area also serves as containment for any spill that may occur in this area. Additionally in 2019 the scrubber roof was replaced.

8. Both slakers' agitators have been upgraded and replaced. New grit screens were also installed. (Agitator #2 in 2023, #1 in 2024)
9. Lime silo structural inspections were performed in 2024.
10. All 3 units operate Low NOx (LN) systems.

3.3.4 Residue & Fly-ash

1. The residue load out area is in acceptable condition with no fugitive ash emissions witnessed during the inspection.
2. Residue and metal load out vehicles continue to utilize a dedicated scale that was installed in 2014 so they do not need to loop the facility.
3. All 3 units' ash extractor transition chutes were replaced during the outages in 2024.
4. Major conveyor replacements, including the south slipstick, in bottom ash area planned for 2025
5. Operating procedures include operation of a street sweeper several times weekly except during inclement weather.
6. Ten year ash crane rail inspection was performed.

3.4 Preventive Maintenance

3.4.1 Preventive Maintenance System

The facility is using the Asset Life Management (ALM) maintenance program in PeopleSoft to generate and track corrective work orders, and for preventive maintenance work orders.

3.4.2 Outage Schedules

The facility completed Major Boiler Maintenance Outages on each of the operating units in 2024 sufficient to maintain the equipment in good working condition throughout 2025. In addition to the annual approximate 13-day scheduled boiler outages, on-line explosives and on-line water washing are used to clean boiler tube surfaces and maintain optimum operating conditions. During 2023 there was a cold iron outage to address inspection and maintenance of critical common equipment.

Outages provide the facility a chance to perform maintenance on critical equipment, perform equipment assessments, and gather data to develop future outage scopes so that the facility continues to run in an acceptable manner.

Outage worklists were reviewed and found to be thorough. Planned activities included standard boiler tube replacements, calibrations and reliability impact items. All units had economizer work performed.

3.4.3 Outage Tasks

Documentation of work performed during outages for all three units was reviewed and indicate that appropriate activities relative to boiler and air pollution control system maintenance are being performed.

3.4.4 Forced Outage Work List

The preventive maintenance/work order system contains a category for the type of outage required, i.e. boiler or full plant. A list of items can be queried and printed quickly should an unexpected forced outage occur.

3.4.5 Bulk Chemical Storage Tanks

Tank 06170 (Potassium hydroxide) Which was no longer in use at the facility was closed out and removed from the site in October 2024. Reagent feed is achieved through the use of drums.

During a September 17, 2024 NYSDEC inspection of chemical storage, deficiencies were noted on Tank 06171 (Sodium phosphate) related to the containment, labelling and level measurement. In response the facility has removed the tank from service and will utilize a smaller which is under the threshold for regulation.

The facility uses modular mixed beds for water treatment, eliminating the need to use or store large quantities of chemicals. The water treatment multimedia filters were replaced in 2021. The sodium hydroxide and potassium hydroxide tanks received the required 5-year inspections in 2020. Minor issues noted in the report were addressed. NYSDEC tank permits renewed in 2023 and expire in 2025.

The facility constructed a new bulk tank to store kerosene used to operate heaters that are strategically placed all throughout the facility to prevent freezing of critical plant equipment. The installation is complete and operational as a final certified pressure test has been performed and County approvals have been received.

3.4.6 Balance of Plant

At the time of the inspection, the following items were also noted:

1. The installation of front auxiliary burner fire sprinklers was underway at the time of the inspection. The scope of work included additional insulation and heat tracing of the lines which were previously winterized to prevent freezing.
2. Boiler feedpump #2 and cic water pump #2 were both overhauled in 2024.
3. The Reserve Side Switchgear PT and CT were replaced with anti-flash coating
4. Tipping Floor Task Force Improvements including new fire monitors, IR and PTZ cameras, new elevated control booth/ truck dispatch system with lighting and mechanical arms at entrances went into service.
5. Replaced A-Side sifting Conveyors with new conveyors with new upgraded direct drive gearbox in 2021.
6. Upgraded evaporator tubes in soot blower lane to spiral wound inconel tubes on all boilers at the 192' elevation in 2022.

7. Additional tipping floor cameras have been added to assist in identifying bulky wastes. These cameras are being tested utilizing an AI interface to assist in identifying unacceptable waste.

4 CONCLUSION

Based upon the above inspection, technical data review, personnel interviews and the general condition of the Facility it is my opinion that the safety, emergency, security, process and control equipment at the Hempstead Resource Recovery Facility, located at 600 Merchants Concourse, Westbury, NY 11590 and owned and operated by Reworld™ Hempstead, Inc. are in acceptable operating condition.

ATTACHMENT 3

**2024 ANNUAL SOLID WASTE REPORT
HEMPSTEAD RESOURCE RECOVERY FACILITY**

**FINANCIAL ASSURANCE DOCUMENT
(PER SECTION 12)**

**Hempstead Resource Recovery Facility (Reworld Hempstead)
Closure Cost Estimate**

Date: February 7, 2025

Item	Cost	Cost Basis
Third-Party Removal of wastes, reagents, oils, process waters and other materials		
Refuse in pit	\$897,104	Transport and disposal to other Long Island Covanta facility
Ash Residue in bunker	\$103,808	Transport and disposal to LI non-hazardous waste landfill
Ferrous and non-ferrous metal removal	\$4,394	Transport to metal recycler
Pebble lime	\$36,616	Hydrate lime in process water basin and dispose of with combined ash residue. Transport and disposal to LI non-hazardous waste landfill
Lime slurry	\$13,223	Transport and disposal as hazardous waste using vacuum truck
Storm basin	\$73,233	Transport and disposal to LI non-hazardous waste landfill using vacuum truck
Urea	\$7,120	Transport and disposal.
Diesel fuel	\$0	Transport and disposal in 55 gallon drums (non-hazardous waste).
Sulfamic acid/Scale Break	\$2,034	Transport and disposal in 55 gallon drums (hazardous waste). Single trailer load.
Mixed water treatment chemical (all permitted tank working cap.)	\$2,029	Transport and disposal in 55 gallon drums (hazardous waste). Single trailer load.
Virgin/used oils (turbine lube, turbine hydraulic, stoker hydraulic, misc lube oil drums)	\$1,614	Transport and disposal in 55 gallon drums (non-hazardous waste).
Process wastewaters (low quality tank and various sumps). Well and demin water is clean and can drain to ground.	\$12,205	Transport and disposal (non-hazardous) at local wastewater treatment facility.
Disposal of all used baghouse bags	\$38,651	Transportation and disposal as hazardous waste. Single load.
Third-Party Cleaning and decontamination		
Refuse related - refuse pit, tipping floor and bldg, charging decks, cranes (trolley, bridge and grapples).	\$95,481	Third party labor and equipment - getting to broom clean.
Residue related - residue bunker, residue conveyors, pugmills, residue loadout and metal recovery equipment and residue loadout bldg.	\$131,762	Third party labor and equipment - getting to broom clean.
Boiler related - Deslag boilers, remove clinker/residue, grates, hoppers, ash dischargers, feed chute hoppers.	\$177,354	Third party labor and equipment
Air Pollution Control related - scubber vessels, baghouses, slurry tanks/pumps/piping, DeNOx system.	\$251,846	Third party labor and equipment
Bldg cleaning - boiler house, turbine bldg, Water treatment, admin, maintenance shop, metals building, circ water building.	\$257,273	Third party labor and equipment - getting to broom clean.
Decontamination of all tanks and storage vessels	\$35,142	Third party labor and equipment
Decontamination of cooling tower basin	\$24,706	Third party labor and equipment
Clean out all indoor and outdoor process water trenches and settling basin	\$14,958	Third party labor and equipment
Misc facility and grounds cleaning	\$7,479	Third party labor and equipment
Stormbasin cleanout	\$30,514	Third party labor and equipment
Contingency @ 5%	\$109,402	
GRAND TOTAL	\$2,327,945	

2024 update
2025 Update

\$2,589,738
\$2,652,150 1.0241 or 2.41% increase

Surety Bond Rider No. 1

Rider to be attached to and form a part of Bond No. SUR0065118

Wherein Argonaut Insurance Company is named as Surety
on behalf of Reworld Hempstead II, LLC as Principal
in favour of New York State Department of Environmental Conservation as Obligee
in the sum of \$2,589,738.00
dated 11/01/2020

The bond is to be amended as follows:

The Underwriting Company is amended:

From: Argonaut Insurance Company
P.O. Box 469011, San Antonio, TX 78246

To: Pennsylvania Insurance Company
P.O. Box 3646 Omaha, NE 68103-0646

The Bond number is also amended:

From: SUR0065118


To: SBP150838015

Effective date: March 1, 2025

Provided, however, that the liability of the Principal and Surety hereon shall not be cumulative or in any event exceed the revised bond amount referred to herein.

Signed, sealed and dated this 25th February 2025.

Pennsylvania Insurance Company



William T Krumm , Attorney-in-fact

POWER OF ATTORNEY NO. ARTJCH01_0523

KNOW ALL MEN BY THESE PRESENTS: That the California Insurance Company, duly organized and existing under the laws of the State of California and having its principal office in the County of San Mateo, California, and Continental Indemnity Company, Illinois Insurance Company and Pennsylvania Insurance Company, corporations duly organized and existing under the laws of the State of New Mexico and having their principal office in the County of Santa Fe, New Mexico does hereby nominate, constitute and appoint:

William T Krumm, Christopher West, Christina Laurendi, Donna A. Irigoyen, Jodie Sellers, Jon A. Schroeder, Elizabeth Mosca, Cassandra Stone

Its true and lawful agent and attorney-in-fact, to make, execute, seal and deliver for and on its behalf as surety, and its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship (NOT INCLUDING bonds without a fixed penalty or financial guarantee) provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:

“Unlimited“

This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of California Insurance Company, Continental Indemnity Company, Illinois Insurance Company and Pennsylvania Insurance Company.

“RESOLVED, That the President, Senior Vice President, Vice President, Assisted Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney of the Company, qualifying the attorney or attorneys named in given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the California Insurance Company, Continental Indemnity Company, Illinois Insurance Company and Pennsylvania Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto.”

IN WITNESS WHEREOF, California Insurance Company, Continental Indemnity Company, Illinois Insurance Company and Pennsylvania Insurance Company, has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer the 16th day of August 2023.

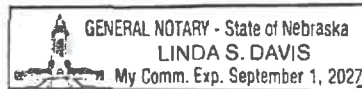
California Insurance Company, Continental Indemnity Company, Illinois Insurance Company, Pennsylvania Insurance Company

By Jeffrey A. Silver Jeffrey A. Silver, Secretary

STATE OF NEBRASKA
COUNTY OF DOUGLAS SS:

On this 16th day of August A.D. 2023, before me a Notary Public of the State of Nebraska, in and for the County of Douglas, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of the same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Douglas, the day and year first above written.



Linda S. Davis
(Notary Public)

I, the undersigned Officer of the California Insurance Company, a California Corporation of Foster City, California, Continental Indemnity Company, Illinois Insurance Company and Pennsylvania Insurance Company, New Mexico Corporations of Santa Fe, New Mexico, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 25th day of February, 2025

Jeffrey A. Silver Jeffrey A. Silver, Secretary

INCREASE PENALTY RIDER

BOND AMOUNT \$2,589,738.00 BOND NO. SBP150838015

To be attached and form a part of Bond No. SBP150838015 dated the 1st Day of November, 2020, executed by Pennsylvania Insurance Company as surety, on behalf of Reworld Hempstead II, LLC as current principal of record, and in favor of New York State Department of Environmental Conservation, as Obligee for Closure Plan for Hempstead Plant, and in the amount of Two Million Five Hundred Eighty Nine Thousand Seven Hundred Thirty Eight Dollars and 00/100 (\$2,589,738.00).

In consideration of the agreed premium charged for this bond, it is understood and agreed that Pennsylvania Insurance Company hereby consents that effective from the 1st Day of March, 2025, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE INCREASED:

FROM: Two Million Five Hundred Eighty Nine Thousand Seven Hundred Thirty Eight Dollars and 00/100 (\$2,589,738.00)

TO: Two Million Six Hundred Fifty Two Thousand One Hundred Fifty Dollars and 00/100 (\$2,652,150.00)

The INCREASE of said bond penalty shall be effective as of the 1st Day of March, 2025, and does hereby agree that the continuity of protection under said bond subject to changes in penalty shall not be impaired hereby, provided that the aggregate liability of the above mentioned bond shall not exceed the amount of liability assumed by it at the time the act and/or acts of default were committed and in no event shall such liability be cumulative.

Signed, sealed and dated this 25th Day of February, 2025



Reworld Hempstead II, LLC
PRINCIPAL

BY

Pennsylvania Insurance Company
SURETY

BY

William T. Krumm, ATTORNEY-IN-FACT

THE ABOVE BOND IS HEREBY AGREED TO AND ACCEPTED BY:

New York State Department of Environmental Conservation
OBLIGEE

BY

TITLE

GENERAL SURETY RIDER

To be attached and form a part of

Bond No. SUR0065118
For Closure Plan for Hempstead Plant
Dated effective 11/01/2020 (MONTH, DAY, YEAR)
Executed by Covanta Hempstead Company, as Principal, (PRINCIPAL)
And by Argonaut Insurance Company, as Surety, (SURETY)
And in favor of New York State Department of Environmental Conservation (OBLIGEE)

In consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

INFORMATION	FROM	TO
Principal Name	Covanta Hempstead Company	Reworld Hempstead II, LLC

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated.

This rider is effective


11/01/2024

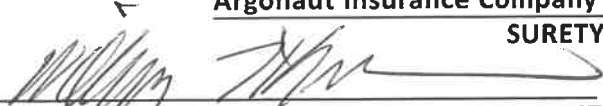
(MONTH, DAY, YEAR)

Signed and Sealed

10/01/2024

(MONTH, DAY, YEAR)

BY  James B. Scott V.P. Risk Management
PRINCIPAL
TITLE

BY  William T. Krumm
Argonaut Insurance Company
SURETY
William T Krumm, ATTORNEY-IN-FACT

State of Illinois }
County of Cook } ss:

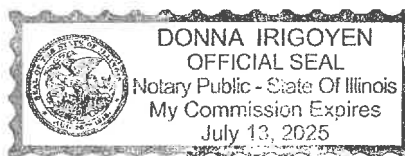
On this 1st day October in the year two thousand twenty four, before me, Donna Irigoyen, a Notary Public in and for said County and State, residing therein, duly commissioned and sworn, personally appeared William T Krumm known to me to be the duly authorized Attorney-in-fact of the Argonaut Insurance Company and the same person whose name is subscribed to the within instrument as the Attorney-in-fact of said Company and that he duly acknowledged to me that he subscribed the name of the Argonaut Insurance Company and thereto as Surety and his own name as Attorney-in-fact.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this Certificate first above written.



7/13/2025
My commission expires

Notary Public in and for Donna Irigoyen
City, State of Rolling Meadows, Illinois



**Argonaut Insurance Company
Deliveries Only: 225 W. Washington, 24th Floor
Chicago, IL 60606**

**United States Postal Service: P.O. Box 469011, San Antonio, TX 78246
POWER OF ATTORNEY**

KNOW ALL MEN BY THESE PRESENTS: That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois does hereby nominate, constitute and appoint: **William T. Krumm**

Surety Bond No.: SUR0065118
Principal: Reworld Hempstead II, LLC
Obligee: New York State Department of Environmental Conservation

Their true and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:

\$97,550,000.00

This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED, That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto."

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 19th day of November, 2021.

Argonaut Insurance Company



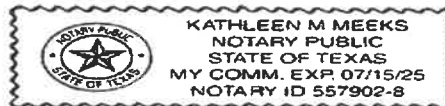
by:

Gary E. Grose, President

STATE OF TEXAS
COUNTY OF HARRIS SS:

On this 19th day of November, 2021 A.D. before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Harris, the day and year first above written.



(Notary Public)

I, the undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 1st day of October, 2024.



Austin W. King, Secretary