Wheelabrator
HUDSON FALLS

Wheelabrator Hudson Falls
93 River Street
Hudson Falls, NY 12839

518.747.2390 phone
518.747.2582 fax
www.wtienergy.com

February 27, 2025

Katelyn White
New York State Department of Environmental Conservation
232 Golf Course Road
Warrensburg, New York 12885

RE: ANNUAL FACILITY OPERATING REPORT

Dear Ms. White:

In accordance with our Operating Permit Special Condition SW-18 and 6NYCRR360, Section 3, we are pleased to submit our 2024 Annual Facility Operating Report.

If I can be of any further assistance, please do not hesitate to call me at 747-2390.

Very truly yours,

Maurice C. Holcomb
Plant Manager

MCH/rb
Enclosure

cc: NYSDEC Solid Waste, Albany
R. Brynes - WHF
Control Room Permit Folder
Correspondence Index
File:WST.3210.20241231.Annual Solid Waste Report

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NEW YORK STATE | Department of Environmental Conservation

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

FACILITY NAME: Wheelabrator Hudson Falls LLC			
FACILITY LOCATION ADDRESS: 93 River Street	**FACILITY CITY:** Hudson Falls	**STATE:** NY	**ZIP CODE:** 12839
FACILITY TOWN: Kingsbury	**FACILITY COUNTY:** Washington	**FACILITY PHONE NUMBER:** (518) 747-2390	
FACILITY NYS PLANNING UNIT: (A list of NYS Planning Units can be found at the end of this report). Washington County		**NYSDEC REGION #:** 5	

360 PERMIT #: 5-5344-00001/00019	**DATE ISSUED:** 4/17/2020	**DATE EXPIRES:** 4/16/2030	**NYS DEC ACTIVITY CODE:** 58E01

FACILITY CONTACT: Robert Brynes	☐ **public** ■ **private**	**CONTACT PHONE NUMBER:** (518)747-3673	**CONTACT FAX NUMBER:** (518)747-7582
CONTACT EMAIL ADDRESS: rbrynes@win-waste.com			

OWNER INFORMATION

OWNER NAME: Win-Waste Innovations	**OWNER PHONE NUMBER:** (603) 929-3000	**OWNER FAX NUMBER:** (603) 929-7582	
OWNER ADDRESS: 90 Arboretum Drive, Suite 300	**OWNER CITY:** Portsmouth	**STATE:** NH	**ZIP CODE:** 03801
OWNER CONTACT: Maurice Holcomb	**OWNER CONTACT EMAIL ADDRESS:** mholcomb@win-waste.com		

OPERATOR INFORMATION

OPERATOR NAME: ■ *same as owner* ☐ **public** ☒ **private**

PREFERENCES

Preferred address to receive correspondence: ■ *Facility location address* ☐ *Owner address* ☐ *Other (provide):*

Preferred email address: ■ *Facility Contact* ☐ *Owner Contact* ☐ *Other (provide):*

Preferred individual to receive correspondence: ■ *Facility Contact* ☐ *Owner Contact* ☐ *Other (provide):*

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)	251.12	337.46	332.48	277.46	355.5	225.43	269.46
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)	7,406.54	11,819.64	10,003.81	9,643.02	12,575.49	12,169.49	11,532.46
Sewage Treatment Plant Sludge	558.29	501.13	481.62	511.63	422.62	440.08	570.55
Treated Regulated Medical Waste							
Emergency Authorization Waste (Storm Debris)							
International	0.44	0.04	0.11	0.08	0.16	0.21	0.08
Pharmaceuticals	36.05	34.48	73.61	57.98	40.02	64.25	35.71
Tires	13.04	11.60	42.75	46.23	84.26	75.32	37.66
Total Tons Received	8,265.48	12,704.35	10,934.38	10,536.80	13,478.05	12,974.78	12,445.92
Total Tons Processed	8,668.50	11,795.71	11,446.29	12,490.08	12,876.09	12,226.59	11,629.54

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)		287.84	269.91	262.45	227.45	307.35	3,403.91	9.30
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)		8,375.47	10,721.41	11,668.53	11,258.95	11,168.80	128,344.01	350.67
Sewage Treatment Plant Sludge		451.30	362.00	508.35	457.27	467.17	5,731.98	15.66
Treated Regulated Medical Waste								
Emergency Authorization Waste (Storm Debris)								
International		2.43	1.63	0.13	0.05	0.20	5.56	0.015
Pharmaceuticals		46.08	52.85	53.86	33.24	57.79	585.92	1.60
Tires		42.12	45.68	62.41	43.11	55.19	559.37	1.53
Total Tons Received		9,205.24	11,453.48	12,555.73	12,020.04	12,056.50	138,630.75	378.77
Total Tons Processed		10,533.02	11,040.36	12,531.62	11,630.29	12,482.55	139,350.64	380.74

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:

100 % 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 (See Attached List of NYS Planning Units)**	**TONS RECEIVED**
Construction & Demolition Debris					
Industrial Waste (Including Industrial Process Sludges)					
	See attached Sheet				3,403.91

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)					
	See Attached Sheet				128,344.04
Sewage Treatment Plant Sludge	City of Glens Falls	NY	Warren	Warren County	5,731.98
Treated Regulated Medical Waste (TRMW)*					
Emergency Authorization Waste (Storm Debris)					
Other (specify)					
International	Precision Industrial	NY	Albany	Capital Region Solid Waste Management Partnership	5.56
Whole Tires	See attached Sheet				559.37
Pharmaceuticals	See Attached Sheet				585.92
				TOTAL RECEIVED (tons):	138,630.75

Part 360 Permit Limit (tpy) _____

Permit Limit based on Steaming rate (tpy) 70,000 rolling 1 hour average per unit

* List generators that provide you Certificates of Treatment forms and quantities of TRMW from each N/A

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**
Industrial Waste	Casella Waste Management, Hepaco LLC, County Waste & Recyling	NY	Albany County	Capital Region Solid Waste Management Partnership (CRSWMP)	252.81
	TAYLOR GARBAGE SERVICE INC	NY	Broome County	Broome County	84.85
	Veolia Environmental Services	NY	Clinton	Clinton County	83.04
	Veolia Environmental Services	NY	Essex	Essex County	4.09
	Casella Waste Management	NY	Rensselear County	Rensselear County	1,767.94
	Direct Haul	NY	Saratoga	Saratoga County	30.15
	Direct Haul, Waste Management	NY	Warren County	Warren County	240.80
	Direct Haul, ESMI	NY	Washington County	Washington County	900.10
	TRIUMVIRATE ENVIRONMENTAL INC	NY	Westchester County	Westchester County	10.62
	TAM INC DBA Casella Waste Shaftsbury	Vt	Bennington	N/A	29.60

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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, and Commercial)	Murphy Road Western Recycling Casella Waste Management Auburne	Ma	Hampden County	N/A	4,739.82
	Murphy Road Western Recycling	Ma	Hampshire County	N/A	240.61
	Casella Waste Management	Ma	Worcester County	N/A	25,568.15
	Direct Haul, WM ENY Albany, Casella Waste Management	NY	Albany County	Capital Region Solid Waste Management Partnership (CRSWMP)	3,346.63
	US Customs	NY	Clinton County	Clinton County	1.00
	Casella Waste Management	NY	Essex County	Essex County	77.08
	Waste Manangement of ENY Albany Hauling	NY	Fulton County	Fulton County	306.07
	Consolidated Waste Services, Casella Waste Management, WM ENV Albany	NY	Rensselaer County	Poestenkill (Town) - ERCSWMA Inactive Member	4,360.64
	Ace Carting, Casella Waste, Consolidated Waste Services, County Waste, Republic Services, Waste Management of ENY, Direct Haul	NY	Saratoga County	Saratoga County	37,383.67
	Direct Haul, WM ENY Albany	NY	Schenectady County	Schenectady County	66.88
	Casella Waste Management - Oneonta	NY	Schoharie County	Schoharie County	592.22
	Casella Waste, Ace Carting, Republic Services, CV Waste, IBS Waste, Waste Management of ENY, Direct Haul	NY	Warren County	Warren County	17,191.02
	Casella Waste, Waste Management of ENY, IBS Waste, CV Waste, Republic Services, Carpenter Waste, Direct Haul	NY	Washington County	Washington County	14,768.78
	Direct Haul	NY	Ulster	Ulster County	362.88
	Casella Waste Manangement	Vt	Chittenden County	N/A	720.92
	US Customs	Vt	Franklin County	N/A	0.87
	Hubbard Brothers, Town of Castleton	Vt	Rutland County	N/A	17,616.80
					-

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**
Pharmaceuticals	Clean Harbors	Canada	Ontario	N/A	44.96
	DANOX ENVIRONMENTAL SERVICES INC	NY	Chenango	Chenango County	261.70
	Triumvirate Environmental Inc.	NY	Westchester	Westchester County	120.64
	DANOX ENVIRONMENTAL SERVICES INC	OH	Franklin	N/A	39.05
	DANOX ENVIRONMENTAL SERVICES INC	Vt	Franklin	N/A	119.57

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**
Whole Tires	Casella Waste Management, WM of Fort Edward	NY	Albany County	Capital Region Solid Waste Management Partnership (CRSWMP)	31.80
	NEW ENGLAND WASTE SERVICES OF NY INC	NY	Clinton	Clinton County	38.46
	Serkill, Moore Recycling, Town of North Elba	NY	Essex County	Essex County	109.07
	Bonded Concrete	NY	Rensselaer County	Rensselaer County	73.28
	Earth, Waste, and Metal, Town of Castleton	Vt	Rutland	N/A	86.62
	Saratoga County DPW, Saratoga Spa Park, JGS Recycling, Waste Management, Plan It Waste Recycling, Crist Trucking	NY	Saratoga County	Saratoga County	66.60
	CASELLA WASTE MANAGEMENT INC	NY	Schoharie	Schoharie County	130.35
	WM of ENY Fort Edward	NY	Ulster County	Ulster County	2.31
	NYSDEC, WM of ENY Fort Edward	NY	Warren County	Warren County	20.88

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SECTION 4 – PLANT PERFORMANCE LOG

Complete the following Annual/Quarterly Plant Performance Log:

PLANT PERFORMANCE LOG ANNUAL/QUARTERLY SUMMARY

Processible Waste Bypassed (Tons): 0.00
Untreatable Waste Bypassed (Tons): 7.73
Incinerator #1 Operations (Hours): 7,807.52
Incinerator #2 Operations (Hours): 7,863.30
Incinerator #3 Operations (Hours): N/A
Incinerator #4 Operations (Hours): N/A

Steam Generated (Klbs): 947,027.79
Steam Sold (Klbs): N/A
Turbine Operation (Hours): 8,690.92
Turbine Steam Consumption (Klbs): Not Measured
Power Generation (MWH): 81,939.48
Purchased Power (MWH): 10.10
Annual Electricity Sold to User (MWH): 67,427.05

Ash Residue (Tons): 39,526.21
Volatile Matter in Ash (%): N/A
Ferrous Metal Recovered (Tons): 2,277.61
Ferrous Metal Sold (Tons): 2,277.61
Non-ferrous Metal Recovered (Tons): N/A
Non-ferrous Metal Sold (Tons) N/A
Water Consumption (Kgal): 17,092.00

Facility's Size

Number of Units Installed: 2

Nominal rated capacity of each unit: 70,000 lbs/hr

Operations

Facility is in production:
Hours per day: 24
Days per week: 7
Days per year: 365

Hours of Downtime	Unit #1	Unit #2	Unit #3	Unit #4	Total
Scheduled Maintenance	468.00	481.78			949.78
Unscheduled Maintenance	508.48	438.92			947.40
Total	976.48	920.70			1,897.18
Availability (%)	88.88%	89.52%			

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):

100 % 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 (Name & Address)	DESTINATION STATE OR COUNTRY	DESTINATION COUNTY OR PROVINCE	DESTINATION NYS PLANNING UNIT (See Attached List of NYS Planning Units)	AMOUNT TO TRANSFER DESTINATION (TONS)	AMOUNT TO DISPOSAL DESTINATION (TONS)	AMOUNT USED AS AOC (TONS)	TOTAL YEAR (TONS)
Ash (MSW Energy Recovery)	Shrewsbury Landfill	Ma	N/A	N/A	39,526.21	39,526.21		39,526.21
Bypass								
Emergency Authorization Waste (Storm Debris)								
Other (specify)								
							TOTAL SENT (tons):	39,526.21

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):

100 % 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** (Name & Address)	**DESTINATION STATE OR COUNTRY**	**DESTINATION COUNTY OR PROVINCE**	**DESTINATION NYS PLANNING UNIT** (See Attached List of NYS Planning Units)	**TONS RECOVERED** (out of facility)
Ferrous Metal	Upstate Shredding	NY	Tioga	Tioga County	2,277.61
Non-ferrous Metal					
Other Metal (specify)					
TOTAL METAL RECOVERED (tons):					2,277.61

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.

06/11/2024 at 0900, Small litium Battery Fire Started a minor fire on the tipping floor that was immediately put out.

09/30/2024 at 0933, small lithium battery started a minor fire on the tipping floor that was immediately put out.

10/1/2024 at 0715, small lithium battery started a minor fire on the tipping floor that was immediately put out.

10/14/2024 at 0810, small lithium battery started a minor fire on the tipping floor that was immediately put out.

SECTION 8 - BUDGET

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

Facility is privately owned. Corporation requests that all matters pertaining to Income and expenses be treated as private documents.

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.

No longer required by regulation or permit.

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.

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? X Yes _____ No

Identify Manufacturer Luudlum and Model 44-8 of fixed unit.

Does your facility use a portable radiation monitor? X Yes _____ No

Identify Manufacturer Ludlum and Model 3 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
			See Attached	Sheet					

Section 11 - Radiation Monitoring

Incident Number	Received		Hauler	Origin	Truck Number	Reading uR/hr	Disposal Status	Processed	
	Date	Time						Date	Time
WHF-01	2/12/2024	0620	Casella Waste Management	Glens Falls Hospital	1392	100	Returned to Hospital	2/12/2024	0810
WHF-02	4/17/2024	1207	Waste Management of ENY	Queensbury Transfer Station	14209	800	Returned to Transfer Station	4/17/2024	1443
WHF-03	8/22/2024	1528	CV Waste	Hudson Falls Residential	14434	480	Returned to CV Waste Shop	8/23/2024	1217
WHF-04	9/10/2024	0715	Hubbard Brothers	Vermont	181996	850	Returned to Bennington Transfer Station	9/10/2024	1548
WHF-05	10/10/2024	1456	Double M Trucking	Glens Falls Residential MSW	14817	650	Returned to Double M shop	10/15/2024	1435
WHF-06	11/1/2024	0620	Casella Waste Management	Tabor Road Transfer Station	14508	450	Returned to Tabor Road Transfer	10/15/2024	1346
WHF-07									
WHF-08									

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?

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

2.22.25
Date

Maurice Holcomb
Name (Print or Type)

Plant Manager
Title (Print or Type)

mholcomb@win-waste.com
Email (Print or Type)

93 River Street
Address

Hudson Falls
City

New York 12839
State and Zip

(518) 747-2390
Phone Number

ATTACHMENTS: X YES ____ NO
(Please check appropriate line)

Wheelabrator Hudson Falls LLC

FACILITY CLOSURE PLAN

1.0 METHOD OF CLOSURE

1.1 General

This closure plan is designed to document costs and activities associated with closing Wheelabrator Hudson Falls Waste to Energy facility located in Hudson Falls, New York. Activities associated with closure include removal of waste, stored materials, chemicals, and lubricants. A thorough cleaning of the Facility would also be performed, including wash down and general housekeeping activities. All water used in the cooling system and boiler must be discharged to the sewer system. These activities are discussed below in more detail.

1.2 Disposal of On-Site MSW and Ash Residue

The pit and ash residue storage areas are assumed to be completely full of MSW and ash residue, respectively. The capacity of the pit is 3,000 tons of MSW and a maximum ash residue storage capacity of 1,350 tons (3.5 days generation at the maximum continuous rating). This is a very conservative estimate and can only be realized in practice if ash is allowed to stockpile in the ash handling building. All waste materials will be loaded onto 30-ton trucks and transported to the Waste Management High Acres Landfill in New York.

A tipping fee of $65 was used to calculate the disposal cost (including transportation). This is based on current prices at the Waste Management High Acres.

1.3 High Pressure Washing of Areas Exposed to MSW and Ash Residue

Once the waste material is removed from the facility, the storage areas for MSW and ash reside would be thoroughly washed by high-pressure washing. These areas include the tipping floor, pit, crane buckets, charging hoppers, ram feeders, residue conveyors, and residue storage building floor. All wash water would be collected and transported to an approved disposal location or treated on site for discharge to the sanitary sewer.

1.4 Drain and Flush All Liquid Containing Vessels

1.4.1 System Process Wasters

This involves draining the boiler water, cooling water, and residue quench water contained in the boiler, cooling tower, closed loop cooling system, condenser, deaerator, combustor, and residue quench trough. A total volume of water for all streams is calculated to be approximately 592,000 gallons, upon treatment on site yielding wastewater within the County discharge limits.

1.4.2 Material Storage Tanks

Chemicals stored in stationary tanks on site include sulfuric acid, sodium hydroxide, lubricating oils, lime, and diesel fuel. All these chemicals are virgin materials and are considered to be a commodity; they are assumed to be sold to third parties at a price which would exceed the drainage cost. A contractor would be hired to clean the stationary tanks to decontaminate them or remove them from disposal. Any disposal of waste listed or characterized under State or Federal RCRA regulations would be managed accordingly.

1.5 General Labor Cost

This task includes the major labor-intensive activities needed to close the Facility. Work activities include:

1.5.1.1 Assisting haulers with refuse and residue loading operations.
1.5.1.2 General Facility cleaning, inside and outside.
1.5.1.3 Drain and flush liquid vessels and lime slurry pipes and associated tanks, including urea tank and carbon tank.
1.5.1.4 Securing Facility buildings and fence line.
1.5.1.5 Shutting off all utilities to Facility.

1.6 Sampling and Analysis

The storm water runoff samples will be collected and sampled as per New York State Stormwater General Permit requirements. Visual runoff samples will be collected and visually inspected quarterly.

1.7 Engineering Supervision and Certification

A registered professional engineer will supervise the entire work effort for Facility closure. He will direct tasks to fully clean, secure, and vacate the Facility. Once work is completed, he will certify that the facility qualifies for closure.

2.0 CLOSURE COST

2.1 MSW and Ash Residue Disposal

Amount of MSW and ash residue for disposal:

Pit capacity (4 days storage) = 550 tpd x 4 days = 2,200 tons

Ash storage capacity (4 days storage in bays) = 357.5 tpd x 4 days = 1,430 tons

Metal Recovery = 50 tons

Total waste for disposal = 3,680 tons

2.1.1 Tipping fee for disposal/transportation = $65/ton:

Based on current tipping fee rates:

Total for MSW and Ash Disposal = 3,680 tons x $65/ton = $239,200

2.2 High Pressure Washing Areas Exposed to MSW and Ash Residue

Tipping floor:	100 ft x 135 ft	= 13,500 ft2
Pit Walls:	135 ft x 85 ft x 1 side	= 11,475 ft2
	135 ft x 20 ft x 1 side	= 2,700 ft2
	30 ft x 85 ft x 2 sides	= 5,100 ft2

Total pit surface area = 32,775 ft2
Charging hoppers/ram feeding system = 3,500 ft2
Ash reside conveyors and building floor = 100 ft x 100 ft. = 10,000 ft2
Ash building storage walls = 150 ft. x 15 ft. = 2,250 ft2

Total area for high pressure washing cost: 48,525 ft2 x $1.50/ft2 = $72,787.50

2.3 Drain and Flush All Liquid Containing Vessels

2.3.1 Volumes of water containing equipment:

Recovered Water Tank	32,000 gal
Boiler (2 x 8,000)	16,000 gal
Deaerator	5,000 gal
Expellers (2 x 2,000)	4,000 gal
Demineralized Water Tank	28,000 gal
Process Water Tank	8,600 gal
Total	**93,600 gal**

Water charge = $ .20/gal

Disposal cost for water: 93,600 gal x $.20/ gal = $18,720

2.3.2 Material Storage Tanks

Chemicals stored in stationary tanks include:

Kerosene Tank	275 gal
Diesel Tank Fire Pump	275 gal
Diesel Fuel	500 gal
Lube Oil Tank	1,140 gal
Lime	6,100 gal
Phosphoric Acid	1,500 gal
Sodium Hydroxide	1,000 gal
Carbon	20,000 gal
Total	**30,790 gal**

Disposal of chemicals – $2.50/gallon x 30,790 gallons = $79,975
Cleaning tanks $1.00/gallon x 30,790 gallons = $ 30,790

2.4 General Labor Cost

Maintenance and securing facility:
Grass mowing and snow plowing = **$36,000**
Repairs/inspections/security = **$10,000**

Labor for general cleaning, flushing vessels, pressure washing, etc.:
20 workers x 2 weeks x 40hr/week x $45/hr = **$72,000**

Total Labor/Maintenance Costs = $118,000

2.5 Boiler Cleaning of Combustion Chambers, pressure washing and furnace blasting.

Blasting 2 boilers = **$10,000**
Washing 2 boilers = **$56,000**

Total for Boiler Cleaning and Blasting = $66,000

2.6 Sampling and Analysis

SPDES annual sampling - **$1,500/year** (Outfall 1 and 3).

Estimate: Engineer $250/hour X 6 hours to get to site, collect samples, and fill out DMR.
Analysis $115 X 2 samples

SPDES quarterly visual samples - **$6,000/year** (Outfall 3).

Estimate: Engineer $250/hour X 6 hours X 4 times/year to get to site, collect samples, and fill out visual inspection sheets.

Total for sample collection, analysis, and reporting = $7,500

2.7 Engineering Supervision and Certification

5 man weeks x 40 hours/man week x $125/hr = $25,000

Cost associated with closure supervision by a registered professional engineer including certification closure.

2.8 Closure Cost Summary

Waste Removal			**$239,200**
Surface Decontamination			**$72,788**
Drain and Flush Liquid Containing Vessels			**$18,720**
Material Storage Tank Disposal			**$79,975**
Material Storage Tank Cleaning			**$30,790**
Maintenance			**$118,000**
Boiler cleaning and blasting			**$66,000**
Sampling and Analysis			**$7,500**
Engineering and Supervision			**$25,000**
Subtotal Closure Costs			**$657,973**
Inflation cost for Facility (10.5%)			**$ N/A**
Administrative Fees (10%)			**$65,798**
Contingency at 12.5%			**$ N/A**
Total Closure Costs	**2020**		**$723,771**
Total Closure Costs	**2021**	**(2020 Cost *1.025)**	**$741,865**
Total Closure Costs	**2022**	**(2021 Cost *1.025)**	**$760,411**
Total Closure Costs	**2023**	**(2022 Cost *1.025)**	**$779,421**
Total Closure Costs	**2024**	**(2023 Cost *1.025)**	**$798,907**

Total Closure Costs 2025 (2024 Cost *1.025) $818,880

2.9 Closure Activities Schedule

Notification

Part 360.21 requires that certain notification be performed in conjunction with the closure of the facility. In addition to NYSDEC regulations, these types of notifications are typical of a Wheelabrator Facility Closure Plan.

The notification and schedules are:

1. In the event of closure of the facility, the owner or operator will notify the department in writing 30 days before closure is expected to begin. This is in accordance with Part 360.21(a)(1).
2. Facility will submit an annual report within 30 days after receiving the final quantity of waste.
3. No solid waste will be accepted after the final date of closure, and all solid waste and ash residue will be removed within 60 days of closure as specified in Section1.2 of this closure plan. This is in accordance with Part 360.21(a)(3).
4. All closure activities will be completed within 90 days after receiving the final quantity of solid waste Part 360.21(a)(4).

5. A final closure report will be submitted to the Department when closure is completed. The report, or certification, will be sealed by an individual licensed to practice engineering in the State of New York; the report will also be retained by the owner or operator. The report will verify that the facility has been closed in accordance with the approved closure plan.