

16 October 2023

Commissioner Katie Dykes  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106-5127

Subject: SWDP Demonstration Project Approval No: 08601340-DP - Issuance January 5, 2022  
[Extension Request]

Dear Commissioner Dykes,

The purpose of this letter is to request an extension of the Solid Waste Demonstration Project Authorization on file (attached) for the above subject.

Section 18 of the SWDP states:

The duration of the Demonstration Project shall not exceed twenty-four (24) months, beginning with the date of this approval, unless an extension is first granted in writing by the Commissioner.

Presently, the CT DEEP SWDP Authorization will be expiring on January 5, 2024, for assessing the viability of manufacturing engineered fill for beneficial use utilizing sediment dredged from Long Island Sound and other dredging locations for upland placement.

Tipping Point Resources Group (TPRG) is requesting the extension as a result of the environmental management and local development/permitting process which includes Site Plan/Coastal Site Plan Approval at the Gateway Terminal Thames River waterfront facility located at 125 Depot Road, Montville, Connecticut. For the past two 2 years TPRG has made significant progress with Gateway Terminals and the Town of Montville Department of Land Use and Development in the permitting for this location to process dredged materials. TPRG continues to be on target for a Fall 2023 permitting approval from the Town of Montville.

As we continue to “break ground” on this endeavor, we have not processed dredged material to date at Gateway Montville as evidenced in our Quarterly Reports that we submit to CT DEEP. As stated above, this is the result of the multi-process undertakings with Gateway Corporate and the Town of Montville. TPRG is optimistic that we are at that juncture in that final approval by the Town of Montville.

Under the existing Authorization, there is a requirement that states “TPRG proposes to manufacture engineered fill through its Pneumatic Flow Tube Mixing (“PFTM”) process in which contaminated dredged sediments will be treated with Portland cement in order to stabilize, and thereby immobilize, contaminants present in the dredged sediments”.



It has been discussed with CT DEEP through the Client Concierge Service which Ms. Amy Richardson coordinated with TPRG and the different regulatory bodies that “other” dredged material stabilization processes could be employed at the Gateway Terminal facility other than the PFTM process.

TPRG would like to respectfully request a modification to the SWDP Authorization for an inclusion with this “addition of utilizing other dredged material stabilization processes for amending dredged material”.

Below, is the discussion that was detailed to this request:

From: Richardson, Amy <[Amy.Richardson@ct.gov](mailto:Amy.Richardson@ct.gov)>  
Sent: Friday, October 28, 2022 12:55 PM

Waste: your contacts are Brent Madho and Gabrielle Frigon

The request to modify the beneficial use determination is acceptable. The additional sources and technology to implement the project are acceptable so long as the final product meets the residential direct exposure criteria as indicated in the Remediation Standard Regulations and does not contradict the Department’s anti-degradation policy. The BUD includes a condition for there to be no detection of PCBs so the Department will not proceed with the request to modify that condition of the BUD. However, if trace amounts of PCBs are detected and material is treated and tested where no PCBs are detected, the BUD would not need to be modified for placement but if instrumentation detection is sensitive to detect below <1PPM then WEED would need an okay from other divisions (Remediation, Anti-deg) that any material which contained trace amounts of PCBs and was treated can be placed at the site.

TPRG acknowledges and will comply with the above BUD determination by CT DEEP on “additional sources and technologies” for the stabilization of dredged materials.

Questions related to this request can be directed to Alfred Kovalik at [alfred@tprgllc.com](mailto:alfred@tprgllc.com) (203)858.4034 or Eric Stern at [eric@tprgllc.com](mailto:eric@tprgllc.com) (201) 247.3281.

Thank you for your consideration.

Sincerely



Alfred N. Kovalik, PE  
Managing Director

Cc: Gabrielle Frigon (CT DEEP)  
Eric Stern (TPRG)

