ENVERONMENTAL PERMITTING FOR RESOURCE RECOVERY PROJECTS

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Discussion by

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The author presents a very thorough and methodical review of permit requirements associated with the implementation of resource recovery projects. Also included are many helpful hints which should greatly facilitate a resource recovery project manager's attempt to make his or her way through the maze of regulatory requirements applicable to these facilities. In this reviewer's experience the author addresses all significant elements of the environmental permitting process.

I would like to underscore the importance of two statements made under the subheadings "Include Emission Data in Bid Documents" and "File Applications Early". In the Northeast Authority's experience it is very important to make detailed and well documented information on environmental permit requirements available to bidders. Failing to do so will have two possible consequences:

(1) Possibly significant delays in construction contract negotiations.

(2) Presentation of "change orders" or other cost increases by the successful bidder.

Applications should be filed early not only to permit an early start of construction but often more importantly to enable the early and successful debt financing of a facility. Typically debt financing cannot be undertaken until assurances are obtained that environmental permits will be granted by the applicable regulatory agencies. These assurances in turn can only be gained through the early submission of the respective permit applications.

As the author states in his conclusion, the environmental permitting process for resource recovery facilities is very complex and varies from location to location. The author's lucid presentation of the factors involved, however, sheds considerable light on the complexities involved and should be read by everybody responsible for resource recovery facilities in the early development stage.

AUTHOR'S REPLY

Preparation is the key to a successful permitting effort. Preparation essentially involves three elements. The first is an in-depth knowledge of the applicable law and regulations. The second, a familiarity with the involved agencies, their procedures and personnel. As a third and final element, the applicant should develop a sympathetic understanding of the issues which are likely to concern project opponents. My paper builds on these three elements and will perhaps serve as a useful guide for permit applicants.

I wish to thank Robert Schoenhofer, Executive Director of the Northeast Maryland Waste Disposal Authority, for his kind remarks in reviewing my paper.