



PERMIT TO CONSTRUCT AND OPERATE A SOLID WASTE VOLUME REDUCTION PLANT

Pursuant to Section(s) 22a-208a and 22a-454 of the Connecticut General Statutes (“CGS”) and Section 22a-209-4 of the Regulations of Connecticut State Agencies (“RCSA”), a Permit to Construct and Operate is hereby issued to:

Permittee:

NLR, Inc.

250 Main Street

East Windsor, CT 06088

Permit No. 04701439-PCO

to operate the volume reduction plant (“Facility”) located at 250 Main Street, East Windsor, Connecticut. Subsequently, the Permit to Operate No. 04701160-PCO issued on June 24, 2014, and minor permit amendment issued January 5, 2016 are no longer in effect and are superseded by the conditions of this Permit as specified in the conditions and attachments set forth herein.

All terms in this Permit are defined in the Permit or if not defined in the Permit are defined in Sections 22a-209-4 and 22a-449(c)-100 of the RCSA or in Title 40 of the Code of Federal Regulations (“CFR”) Part 273.

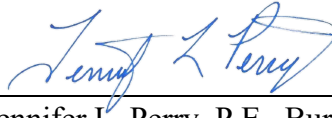
This Permit is based on the information described in the CGS Section 22a-208a permit application (Application No. 201903191) submitted to the Department of Energy and Environmental Protection by the applicant on February 25, 2019, amended on October 2, 2023, October 18, 2023, January 25, 2024, and February 19, 2026. The Permittee must keep records of all data used to complete the permit application and any supplemental information submitted for the effective term of the Permit. Any false statement or inaccuracies contained in the information submitted by the Permittee may result in the suspension, revocation or modification of this Permit and civil or criminal enforcement action.

The Permittee shall comply with all terms and conditions of this Permit. Any violation of any provision of this Permit may subject the Permittee to enforcement action pursuant to the CGS including but not limited to Sections 22a-6 and 22a-131.

This Permit may be revoked, suspended, modified, transferred or reissued, in accordance with applicable law. The Commissioner may also modify this Permit when it is deemed necessary to do so. The Permittee shall submit a permit application to the Commissioner at least one hundred twenty (120) calendar days before making any changes to any of the permitted areas or activities. Any application shall be approved in writing by the Commissioner prior to the Permittee implementing such changes.

Nothing herein authorizes any person, municipality or authority to hinder municipal or regional solid waste recycling efforts. All activities conducted by the Permittee at the Facility shall be in accordance with this Permit and in compliance with the statewide Solid Waste Management Plan.

This Permit shall become effective on May 29, 2026 and shall expire five (5) years from this effective date.

A handwritten signature in blue ink, reading "Jennifer L. Perry". The signature is written in a cursive style with a large, stylized initial "J".

Jennifer L. Perry, P.E., Bureau Chief
Materials Management and Compliance Assurance
Department of Energy and Environmental Protection



APPROVAL OF LICENSE TRANSFER

Transferor:

NLR, Inc.
256 Main Street
PO Box 680
East Windsor, CT 06088
Attention: Raymond Graczyk

Transferee:

TerraCycle US, LLC
d/b/a NLR, Inc.
1 TerraCycle Way
Trenton, NJ 08638
Attention: Kevin Flynn

Re: NLR, Inc.
Facility Location: 250 Main Street, East Windsor, Connecticut 06088
EPA I.D. No. CT5000001495

Dear ***Kevin Flynn and Raymond Graczyk:***

The Department of Energy and Environmental Protection ("the Department") is in receipt of the transfer of the licenses registration, **Application No. 202607002**, received on April 24, 2026 and submitted for the active permits associated with NLR, Inc, due to a change in ownership.

The transfer of the licenses from ***NLR, Inc.*** to ***TerraCycle US, LLC*** shall be effective upon completion of the closing of the ***NLR, Inc.***'s assets and operations provided: 1) such closing takes place within 45 days of this approval and 2) immediately after said closing, ***TerraCycle US, LLC*** submits to the department the enclosed form, ***Confirmation of Closing*** (DEEP-APP-006A), confirming the completion of the closing of the ***NLR, Inc.*** facility. Should the closing fail to take place, please promptly notify the department in writing.

The Department hereby approves the transfer of the licenses listed below provided the requirements above are met to the satisfaction of the Commissioner. Once transferred ***TerraCycle US, LLC*** shall comply with all terms and conditions of the licenses referenced below.

Licenses Approved for Transfer

Description	License No.
Solid & Hazardous Waste Licenses	
Solid Waste Facility Permit	04701439-PCO
Hazardous Waste Transporter	CT-HW-669

TerraCycle US, LLC shall maintain a copy of this license transfer approval letter and the licenses at the ***250 Main Street, East Windsor*** facility for the duration of all licenses transferred. Enclosed please find, for the new permittee, ***TerraCycle US, LLC*** copies of the licenses listed above as being approved to be transferred to their ownership.

TerraCycle US, LLC shall adhere to all applicable timeframes as prescribed in Section IV *Compliance Schedule* of Solid Waste Facility Permit No. 04701439-PCO, issued on May 29, 2026.

Concerning the registration for a hazardous waste generator, the EPA and the Department records need only be updated with the new owner's name. The facility EPA ID number, **CT5000001495**, as well as the status of **small** quantity generator will remain unchanged. If not previously done, the EPA form entitled *RCRA Subtitle C Site Identification Form* (included in the *Notification of Regulated Waste Activity Instructions and Forms*, EPA Form 8700-12, latest revision), must be completed by **TerraCycle US, LLC** and submitted to the Department's Waste Engineering and Enforcement Division. A copy of this form and instructions are available on the EPA website at www.epa.gov/osw/inforesources/data/form8700/forms.htm or by calling the Department's Waste Engineering and Enforcement Division at 860-424-3023.

Upon transfer of the licenses, **TerraCycle US, LLC** shall comply with Connecticut General Statutes section 22a-134pp and Regulations of Connecticut State Agencies section 22a-134tt-1 et seq. For more information, refer to the Department website at www.ct.gov/deep/remediation or contact the Property Transfer Program at 860-424-3705.

Please be aware that in addition to license transfer fees, there may be other fees, such as annual fees or emission fees, associated with the licenses being transferred. The fees from each of the Department's programs vary depending on the facility's specific activity. The Department will invoice the new permittee for such fees prior to the required payment date.

Should **NLR, Inc.** or **TerraCycle US, LLC** wish to conduct any activity requiring authorization by the Department, they must obtain the appropriate licenses and/or approvals prior to conducting such activity. Please be aware that performing an activity without the license required by Title 22a of the General Statutes may subject you to an injunction and penalties.

If you have any questions, please contact Bethany McWade, of the Waste Engineering and Enforcement Division at (860) 424-3303 or by e-mail at Bethany.McWade@ct.gov.

May 29, 2026

Date



Gabrielle Frigon, Director
Waste Engineering and Enforcement Division
Bureau of Materials Management and
Compliance Assurance

Enclosures (transferee only) **Confirmation of Closing form – After License Transfer Approval**

cc: Julie Dutton, CT DEEP Waste Engineering and Enforcement Division
Olimpia Brucato, CT DEEP Waste Engineering and Enforcement Division

Jessica Billiard, CT DEEP Office of Innovative Partnership and Planning