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November 18, 2022

Don Smith, P.E.  
Sr. Environmental Compliance Manager  
Safety-Kleen (A Clean Harbors Company)  
51 Broderick Road  
Bristol, CT 06010

**Subject:** Third Party CT DEEP Audit – Commercial Hazardous Waste Storage and Treatment Facility, and Connecticut 22a-454 Waste Facility (Permit Number DEEP/HWM-017-004) (EPA ID CTD000604488)

Dear Mr. Smith:

ERM Consulting & Engineering, Inc. (“ERM”) is pleased to submit this Executive Summary and report for the CT DEEP RCRA Compliance Audit of the Clean Harbors of Connecticut, Inc. facility located at 51 Broderick Road in Bristol, CT 06010. The purpose of the audit was to assess compliance with statutes and regulations regarding waste and 49 CFR Parts 171 to 180, inclusive (Hazardous Materials Regulations), including the specific requirements of the RCRA Part B/Non-RCRA Permit No. DEEP/HWM-017-004.

Melissa O’Malley, CHMM of the ERM Boston office was commissioned by Clean Harbors of Connecticut, Inc. perform the audit. Melissa is a Certified Hazardous Materials Manager (CHMM) with over 20 years of environmental compliance, auditing, and permitting experience.

***Audit Scope***

An audit checklist was developed including CT DEEP’s current RCRA Inspection Report Treatment/Storage/Disposal Facility (Inspection Report), with additional items added as applicable, based on the facility permit (DEEP/HWM-017-004). Per the Inspection Report, Section III of the mentioned permit is included in the final report. The checklist was approved by Don Smith, P.E., of Clean Harbors, Inc. prior to the audit.

A two-day onsite audit was conducted September 14-15, 2022, with follow up materials being submitted and reviewed through the end of September 2022 (Q3). Don Smith, P.E., Sr. Environmental Compliance Manager, and Bryan Campbell, Facility General Manager, accompanied Melissa while onsite. Access was provided to all permitted areas in the two onsite buildings and the exterior of the site. In addition to onsite observations, records were reviewed, and employee interviews were conducted throughout the

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audit process. A complete list of audited areas, documents reviewed, and list of employees interviewed are included in the following report.

***Audit Findings***

A summary table of the findings identified during the audit and the associated permit condition and regulatory citation is provided as an attachment.

Please do not hesitate to contact the auditor, Melissa O'Malley, at 617-646-7899 if you have any questions.

Sincerely,



Margaret Averill  
Partner  
ERM Consulting & Engineering, Inc.



Stefanie Lee, Ph.D.  
Principal Consultant  
ERM Consulting & Engineering, Inc.

***Attachments***

Clean Harbors - Bristol CT  
ERM Consulting Engineering, Inc - September 2022

Finding Number	Finding Description	Regulatory Requirement	Permit Reference	Comments
1	A roll-off dumpster dated 9/08 did not have its cover tightly secured. A metal recycling roll-off dumpster was also observed to not have a tight cover.	40 CFR 264.173 22a-449(c)-104(a)	Section III B(5)(a)(ii)	The cover was still not secured the day following the initial observation.
2	The Mix-Tub was observed without a cover.	40 CFR 264.173 22a-449(c)-104(a)	Section III D(4)(b)(i)(iv)	
3	A metal recycling roll-off dumpster was observed to have rainwater leaking through it.	40 CFR 264.171 22a-449(c)-104(a)	Section III A(15)	Roll-off was moved from asphalt to truck parking area and rainwater was noted to have stopped leaking.
4	Waste containers were observed without an accumulation start date: - Latex paint waste stored in B7	40 CFR 262.34(a)(2) 22a-449(c)-102(a)	Section III C(7)(c)	
5	Area H is required by the permit to have self-containment pallets that can contain 10% of the volume of all containers on a pallet or 100% of the largest container. No self-containment pallets were observed in Area H.	40 CFR 264.175(a) 22a-449(c)-104(a)(1)	Section III A(25)(b)(iii)	
6	Damage to the containment of the storage areas was observed in two locations. -Damage to berm in M2 Area -Section of flooring cracked and scraped in mix-tub area	40 CFR 264.175(b) 22a-449(c)-104(a)(1) & (a)(2)(V)	Section III A(29) & Section III D(4)(a)(i)	
7	Required signage identifying the type of waste or other material being stored was not observed in all Container Storage Areas. -K9 area -Containment storage area -F area	40 CFR 264.14(c) 22a-449(c)-104(a)(1)	Section III D(1)(b)(i)	
8	Required signage identifying the type of waste or other material being stored was not observed in the Bulk Unloading and Loading Area (BULA).	40 CFR 264.14(c) 22a-449(c)-104(a)(1)	Section III D(2)(a)(v)	The tanker truck being loaded/unloaded did have DOT hazard signs (placards) affixed to it
9	Required signage identifying the type of waste or other material being stored was not observed in the Mix-Tub area.	40 CFR 264.14(c) 22a-449(c)-104(a)(1)	Section III D(4)(b)(i)(l)	A hazard label was noted on the Mix-Tub itself
10	The Inspection Log for the Truck-to-Truck Transfer Area (TTTA) does not cover releases from transportation vehicles used in the area.	40 CFR 264.15(a) 22a-449(c)-104(a)(1)	Section III D(6)(a)(ii)	

OBS 1	Tank 14 in the BULA is labeled "Non-Hazardous" as opposed to "Non-RCRA Wastes" as required by the permit.	--	Section III D(3)(a)(xv)	
OBS 2	The hazard warning sign for the drum crusher was observed covered by paint.	--	Section III D(3)	
OBS 3	A crushed drum was observed to have been left in the Drum Crusher.	--	Section III D(3)	


Clean Harbors - Bristol CT  
ERM Consulting Engineering, Inc - September 2022

Finding Number	Finding Description	Regulatory Requirement	Permit Reference	Comments
OBS 4	The most recent version of the facility layout map shows Area F as a "Toxic Storage" area. During the site visit it was confirmed that Area F was currently being used for storing corrosive products.	--	Section III D(1)(b)(ii)	Management had claimed that no waste areas had changed at the site prior to the audit

**CLEAN HARBORS OF CONNECTICUT, INC.  
51 BRODERICK ROAD  
BRISTOL, CONNECTICUT 06010 EPA ID No. CT000604488  
Permit Number: DEEP/HWM-017-004**

**RCRA (HAZARDOUS WASTE) INSPECTION REPORT TREATMENT/STORAGE/DISPOSAL FACILITY**

**AUDIT DETAILS**

Name(s) of Inspector(s)	Melissa O'Malley, ERM	Date(s) of Inspection	9/14/2022-9/15/2022
Signature of Auditor: 		Signature of Permittee:	
<p><i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i></p>			

**SITE INFORMATION**

Contact Name(s) and Title	Donald Smith Senior Environmental Compliance Manager  Bryan Campbell Facility General Manager	Contact Phone Number	617.721.7315  806-583-8917 x321
Property owned/leased	Owned	Date established at present location	07/01/1992
Number of employees/shifts	20 employees/two overlapping shifts	Site mapping available	Yes
Previous RCRA Inspection	EPA/DEEP September 2017	Active RCRA enforcements (provide details: NOV#, status, compliance notes	Consent Order November 2021 -Self reporting

**PROCESS INFORMATION (Refer to Permit Section II, Drawings referenced in Section II & Table II-1)**

Notable observations and concerns relating to:

Permitted activities performed at the site	Transfer, storage, treatment, and management of hazardous waste, non-hazardous waste, universal wastes, other materials, and used oil accepted from off-site locations as well as wastes generated from on-site activities.
Describe processes (particularly those that involve waste management and treatment)	The site receives wastes from off-site locations, the waste is stored in containers and/or tanks, treated or processed through solidification, stabilization, or wastewater treatment, and transferred to an off-site TSD for final disposition.
Products received (i.e. waste streams such as universal waste, used oils, paints)	Waste streams accepted on-site include used oil, universal waste, hazardous waste, lab pack waste, PaintCare Program waste, wastewater

**SITE CONDITIONS/SETTING (Refer to Permit Sections II & Section III)**

Previous occupants of the site	CT Treatment Corporation
Are traveled surfaces at the facility in good repair? (Permit Section II (A)(3))	Yes
Is waste handled within any area that has bare soil or unprotected surfaces? (Permit Section III(A)(3))	No
Proximity to residential areas, surface water, recharge zone, etc.	The site is situated in an industrial/business park. A tributary to Eight Mile Brook is adjacent to the southeastern property boundary approximately 500 ft. The site is about a 1000 ft from residential areas.
Water supply municipal or onsite (if wells, give approximate locations)	Municipal
Groundwater monitoring wells on-site (location of wells, recent test results)	No
• If yes: briefly describe why installed and any information available	NA
• Groundwater classification	NA
Locations of toxic gas detectors	BULA (Bulk Unloading and Loading Area)
Discuss circumstances of positive detections in any of the toxic gas detectors and response (Permit Appendix III-A, Contingency Plan)	According to Bryan Campbell, there have been no detections of toxic gas in the BULA area
Evidence of on-site disposal	No

**SITE SECURITY (Refer to Permit Section III(A)(1), Section III(A)(24) & Section IV (D))**

24 hr Surveillance system or barrier completely surrounding active portion.	Yes, the facility has a barrier surrounding the active site.
Means to control entry? E.g., fencing surrounding facility, gates, entrances	Fencing
"Danger – Unauthorized Personnel Keep Out" signs posted	Yes

**STATUS (Refer to Permit Section II & Section V)**

	CESQG		Small Quantity Universal Waste Handler
	SQG	X	Large Quantity Universal Waste Handler
X	LQG		Used Oil Processor/Re-Refiner
X	Treatment		Universal Waste Destination Facility
	Disposal	X	Storage
	Interim Status		Transporter
X	Permitted Facility		Recycle/Reclaim
X	CT Regulated Facility		Post Closure Units
X	Commercial Facility	X	Other: Truck to truck transfer facility
Notified as: Any discrepancies between notification/Part A/B and actual operations: yes <b>no</b> If yes: <ul style="list-style-type: none"> <li>• Discuss reason for status change:</li> <li>• Has a status change been requested:</li> </ul>			

**REVIEW OF PERMIT-SPECIFIC OPERATING CONDITIONS (Refer to Permit Section III & Appendix III-A)**

<p>Is the Facility complying with Section III Operating Conditions?</p> <p>All site conditions will be reviewed against permit Section III (included as <b>Addendum 1</b>) to confirm all current operations align with permit conditions.</p>	<p>Findings and observations relating to Section III Operating Conditions are included in Addendum 1.</p>
<p>Provide maintenance, calibration (as appropriate) and continuous operation documentation (include instances of downtime and a brief narrative of the response actions in each case.):</p> <ul style="list-style-type: none"> <li>• Caustic air scrubber (including air fan, water pump(s) and caustic metering pump(s);</li> <li>• Toxic gas detectors; and</li> <li>• Waste treatment and tank headspace sensors.</li> </ul>	<p>Performance of the air scrubber continuous operation was reviewed on the electronic software system, on a computer in the control office. This included verification of calibration data. No instances of downtime were recorded.</p>
<p>Discuss any instances of process control automated shutdown failures (high temperature, pH and tank volume) and response</p>	<p>None observed</p>
<p>Inspector to contact the City of Bristol Fire Chief regarding concerns during FD visits</p>	<p>I spoke with Bristol Fire Chief Richard Hart on 9/29/2022. Chief Hart did not indicate any concerns during inspections. He indicated the site reported nine spills since 2019. No violations were noted during the FD response to the reported spills.</p>

**WASTE TRACKING (Refer to Permit Section III(A)(40), Section IV(K) & Table II-1)**

Notable observations relating to:

Waste profile sheets for each waste	Information was readily available
Waste inventory report	Site utilizes an internal database system (WIN Web)
Waste Management Area log	Information was readily available

**TYPES OF WASTE HANDLED (Refer to Permit Section II)**

X	Ignitables (D001)	X	CT Regulated Hazardous Waste
X	Corrosives (D002)		Precious Metals
X	Reactive (D003)		Scrap Metal
X	TCLP (D004 – 43)	X	Used Oil
X	F or K listed wastes	X	Universal Waste (list type)
X	P or U listed wastes	X	Other: Truck to truck transfer of medical waste. Rarely asbestos and PCB's

**HANDLING METHODS (Refer to Permit Section II)**

X	Containers		Incinerator/Thermal Treatment
X	Aboveground Tanks	X	Chemical, Physical, Biological Treatment
	Underground Tanks		Waste Piles
	Surface Impoundment		Landfill
	Containment Building		Drip Pad
X	Wastewater Treatment		Other

**WASTE ANALYSIS (Refer to Permit Attachment A: Waste Analysis Plan & Section IV(C))**

Are detailed chemical and physical analysis of a representative sample of each hazardous waste obtained before that waste is treated, stored, or disposed:	Yes- the waste is screened by the on-site lab. Analytical information is also gathered as part of the profiling process (depending on the specific type of waste).
• What does the analysis consist of	Onsite lab analysis in accordance with the Waste Analysis Plan
Determination updated annually (documentation on-site):	
• Review written waste analysis plan and implementation process	Plan was updated 11/15/2021 submitted as part of the permit compliance plan
Review waste analysis records results in the facility's operating record	Paper copies reviewed onsite (September and August 2022)

**WASTE ANALYSIS PLAN (Refer to Permit Attachment A: Waste Analysis Plan & Section IV(C))**

Plan on-site	Yes	
Date of Plan	11/15/21	
Prepared by	Fuss & O'Neil, Consultants	
Does plan include:	Yes, location in plan:	
• Testing parameters	- Section 2.33	
• Test methods	-Table 1.4	
• Sampling methods	- Section 6.0	
• Testing frequency	- Section 6.5	
Copy of results on-site	Yes- plan and analysis records were provided by management	



**TRANSPORTATION AND MANIFESTS (Refer to Permit Section I (E)(13), Section III(A)(34-43) & Section IV(J), (R), and (S))**

Date/months of shipping records reviewed	Manifest logs observed for last three years. 10 random manifests/three years were chosen for review
Manifests used for all hazardous waste shipments (explain if no)	Yes
Shipping records used for universal waste (explain if no)	Yes
Shipping records used for used oil (explain if no)	Yes
Appropriate copy(ies) on-site (explain if no)	Yes
Are manifests received at the facility handled and submitted properly?	Yes
<ul style="list-style-type: none"> <li>Describe process for handling manifests.</li> </ul>	Online system for manifest tracking
Are wastes being received from foreign generators?	No
Are wastes being received from rail or water transport?	No
Does the facility generate or initiate shipments of hazardous waste?	Yes
<ul style="list-style-type: none"> <li>Are these manifests created/handled per generator rules</li> </ul>	Yes
Are applicable DOT packaging, marking, and labelling rules being followed?	Yes
Rejected waste load review. <ul style="list-style-type: none"> <li>Provide summary of each rejected load</li> </ul>	Manifest 011906345- incorrect amount Manifest 012229974- no description of reason for full rejection Manifests 012832951, 013544547, 019685119- alternate facility Manifests 012837429, 015901150- Return to generator
Any exception (generators), discrepancy or un-manifested waste reports (facilities)? (explain if no)	Yes
Is the facility reporting manifest discrepancies on all shipments received?	Yes
Are procedures in place for transportation of hazardous wastes between buildings or other locations on their site?	Yes- Procedures for movement of waste are detailed in the Waste Analysis Plan
Are vehicles travelling on public roads?	No
Does the handler transport hazardous waste?	No
Does the transporter have a 22a-449(c)-11 permit?	No
If a permit is not required: <ul style="list-style-type: none"> <li>Shipping documents maintained on-site (hazardous waste):</li> <li>Less than 1,000 kg/month shipped using handler's vehicle (hazardous waste):</li> <li>Universal waste transported to:</li> </ul>	another handler      destination facility      other

**LAND DISPOSAL RESTRICTIONS (Refer to Permit Section III(A)(52-54), Section III & Attachment A: Waste Analysis Plan)\***

<p>Has the generator determined whether the waste:  <input checked="" type="checkbox"/> Meets  <input type="checkbox"/> Does Not Meet the treatment standard(s)          by  <input checked="" type="checkbox"/> Testing the waste  <input checked="" type="checkbox"/> Using knowledge of waste</p>	<p>List sample of LDRs reviewed within the Log of Documentation, Plans, &amp; Records Reviewed           6/30/2021 - Manifest 011229498FLE          6/29/2021 - Manifest 011229497FLE          7/6/2021 - Manifest 011229518FLE</p>
<p>If the waste or contaminated soil does not meet the treatment standard(s), has the generator sent a one-time written notification (or subsequent notification(s) if the waste changes) to each receiving facility?</p>	<p>Yes</p>
<p>If the waste or contaminated soil meets the treatment standard(s) at the original point of generation, has the generator sent a one-time certification (or subsequent notification(s) if the waste changes) to each receiving facility?</p>	<p>Yes</p>
<p>If the generator's waste is subject to a case-by-case extension, no-migration petition, or national capacity variance, has the generator sent a one-time written notification (or subsequent certification(s) if the waste changes) to each receiving facility?</p>	<p>Not applicable to files reviewed</p>
<p>If the generator is managing and treating a restricted waste or contaminated soil in tanks, containers, or containment building to meet applicable treatment standards, has the generator sent a one-time notification (or subsequent certification(s) if the waste changes) to each receiving facility?</p>	<p>NA</p>
<p>Has the generator retained on-site a copy of all LDR documentation or certification for each waste for three years?</p>	<p>Yes- All records are kept electronically and the site provided copies for review</p>
<p>Does the facility maintain a copy of the LDR notification or certification for each waste received?</p>	<p>Yes- All records are kept electronically and the site provided copies for review</p>

\* If applicable, additional CT DEEP Land Disposal Restrictions questionnaire will be reviewed. See Attachment N for additional questions.

**CONTAINER MANAGEMENT**

**CONTAINERS & TANKS OBSERVED (Refer to Permit Section II, Section III & Permit Table II-1)**

Review container and tank storage areas against Part B Permit Table II-1 to confirm permitted areas match permitted conditions. Refer to <b>Permit Table II-1: Waste Management Areas</b> for all permit conditions.	All storage was observed to be within the permitted capacities specified in Table II-1.
Approximate number and sizes of containers observed during audit	60 steel 55-gallon drums 15 plastic 55-gallon drums 4 plastic 5-gallon 14 poly/plastic totes 275-300-gallon 0 fiber 0 bag/sack 25 lab pack 10 roll-off ___ other:

**IGNITABLES/REACTIVES/INCOMPATIBLES (Refer to Permit Section III (A)(47-50) & Section IV(G))**

Where are ignitable or reactive wastes stored?	Area L
Containers holding ignitable or reactive wastes are at least 50 ft from the property line	Yes
Containers of highly flammable wastes are electrically grounded, especially during materials transfer	Yes. Flammable containers were observed to be grounded. No transfer was observed.
Ignitable & reactive wastes separated from sources of ignition or reaction and handled per 265.17	Oxidizers in Area L are situated next to an electrical outlet, which could be considered a possible ignition source.
"No Smoking" signs posted in areas of ignitable or reactive hazardous waste	There was a sign observed near Area L2
Incompatible wastes stored separately	Yes
Explain method for identifying incompatible wastes	Profiles and lab analysis. Signs are posted throughout the facility identifying waste compatibility based on Reactivity Group Number (RGN).
Evaluate records with regard to assessing waste compatibility and note anomalies in identification of unexpected waste incompatibility:	Compatibility determination is part of profiling and materials are placed in storage based on posted RGN compatibility charts.
Are there any instance of spilled materials coming in contact with an incompatible material?	None identified

**SATELLITE ACCUMULATION (Refer to Permit Section II & Section III)**

Approximate number of satellite storage areas	Nine areas are present: five in the laboratory, one at the truck to transfer area, the container storage building, main building, and BULA
Is there less than 55 gallons (or 1 quart acutely hazardous waste) per waste	Yes

stream within each satellite accumulation area	
Containers marked and contents described	Yes
Containers closed when not in use	Yes

**CONTAINER MANAGEMENT (Refer to Section II, Section III & Section IV(R), (S))**

Notable observations relating to:

Impermeable base	Cement slab flooring
Secondary containment	Some areas of secondary containment need repair (curbing berm in M2, and condition of concrete in Mix-tub area. (see photo log)
Management of containers	No issues observed
Condition (leaks, ruptures, corrosion, heat, pressure)	No issues observed
Containers closed when not in use	No issues observed
Incompatibles separated by dike/wall, etc.	No issues observed
Storage is less than 90 days (LQG) (hazardous waste)	Yes
Storage is less than one year (universal waste)	Yes
Does the generator storing F006 hazardous waste for up to 180 days follow 262.34(g)?	NA
Does the generator storing F006 hazardous waste for up to 270 days follow 262.34(h)?	NA
A bar code, or similar tracking device, has been placed on the container such that at all times?	Yes- Bar code system is in use
Containers are following Permit requirements regarding transportation area movement direction of flow (e.g., Permit Section III(B)(6))?	Yes- waste is brought to the staging areas in the main building then moved to the containment storage building
"Empty" containers contain < 1" product?	Yes- empty containers were observed in the container storage building with <1" product
"Empty" gas cylinders and aerosol containers are approaching atmospheric pressure?	No "empty" cylinders were observed
Are hazardous waste containers and containment systems inspected weekly?	Yes. However secondary containment damage was not documented on the most recent inspections reviewed (WC Daily Inspection Log dated 9/14/2022)

**WASTE TANKS (Refer to Section II(A)(4), Section III including Section (D)(3) & Section IV(R))**

Notable observations relating to:

Adequate secondary containment for tanks and ancillary equipment	Yes
Leak detection system (including ancillary equipment)	Yes- Tanks are equipped with an automatic shutoff device and audible and visual alarms
Corrosion protection system (how determined?)	NA

Special requirements for ignitable and reactive waste	NA
Labeling: <ul style="list-style-type: none"> <li>Hazardous waste tanks, words "Hazardous Waste" and description of contents</li> <li>Accumulation Start Date listed on tank</li> </ul>	Yes – "Hazardous Waste" and a description of the contents are listed on the tanks  No- tanks are not labeled with accumulation start date. Date is tracked electronically
Storage is less than 90 days (LQG)?	Yes based on shipping frequency/records
Storage is less than one year for universal waste?	NA- no universal waste was observed
Evidence of releases or leaks (was release reported/date/explain)?	No
Certification of major repairs to tanks	No major tank repairs according to management
Any out of service tanks onsite? (reason)	No
Tank testing results	Observed In-service inspection report for Tank 14, dated 09/12/2017

**EXISTING TANK SYSTEMS (INSTALLED BEFORE JANUARY 12, 1987)**

Written tank integrity assessment on-site (P.E. certified)	NA
Does assessment address all required items? (explain if no)	NA

**NEW TANK SYSTEMS (INSTALLED AFTER JANUARY 12, 1987)**

Written tank design, construction/installation assessment on-site (P.E. certified)	As built plans were provided for Tank 11. A PE certified installation assessment was not provided.
Does assessment address all required items? (explain if no)	Tank 14 built in 1992. Inspection report 9/12/17.

**EMERGENCY PREPAREDNESS & PREVENTION (Refer to Permit Section III (A)(15-19), Section III(B)(1), & Section IV(H))**

Arrangements with local authorities?	Yes. Contingency plan was sent to Burlington Health District, City of Bristol, CT, Capitol Region Emergency Planning Committee, Bristol Fire Department, Bristol Police Department, and Bristol Hospital
Immediately accessible to internal communications/alarm system?	Yes
Telephone/hand-held two-way radio?	Yes
Emergency equipment (fire extinguisher/control, spill control, decontamination equipment)?	Yes
Equipment maintenance?	Yes
Access to emergency equipment and Adequate aisle space?	Yes
Source of water in the event of a fire?	Yes

**INSPECTION SCHEDULE & LOG (Refer to Permit Section III(A)(20-21), Section IV(E) & Attachment B: Inspection Plan)**

Does contact claim inspections are conducted?	Yes
Written inspection schedule	Yes
Inspection log (comment on adequacy of contents: date, time, items inspected, corrective action)	Inspection Logs contain the required elements (date, time, inspector name, area inspected, items/criteria for inspection). When deficiencies were observed, corrective actions were noted.
Daily inspections of tanks are documented?	Yes
Weekly inspections of containers, batteries, other, are documented?	Yes
Written documentation includes: <ul style="list-style-type: none"> <li>• Loading/unloading areas subject to spills (when in use)</li> <li>• Containment, detection, ancillary equipment</li> <li>• Treatment equipment</li> <li>• Physical condition</li> <li>• Containment system</li> <li>• Storage area</li> <li>• Safety and emergency equipment (monthly)</li> <li>• Cathodic protection (within six months, then yearly)</li> <li>• Impressed current (every other month)</li> </ul>	<p>Yes. Spilled fluids are addressed in daily inspections</p> <p>Yes</p> <p>NA</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>NA</p> <p>NA</p>

**RECORD REVIEW**

**PERSONNEL HEALTH & SAFETY/TRAINING RECORDS (Refer to Permit Section III (A)(10), Section IV(F) & Attachment C: Personnel Training Plan)**

Are employees using appropriate personal protective equipment?	Employees do not wear reflective vests when outside of the office area but forklifts and trucks are moving throughout the facility regularly.
Describe required equipment and compliance	Safety shoes, eye protection, and hard hat are used throughout the Operations Areas. Lab coats and eye protection are used in the lab. Hand protection is used when required.
Is respiratory protection provided and used in areas requiring additional protection?	Yes- employees are provided with respiratory protection and training. Respirators are not required at the facility, but are provided as an optional additional PPE for employees.
Training conducted?	Yes
Last annual review (date)	Training dates are reviewed on an ongoing basis per online system.
Written description of training	Numerous safety trainings are taken depending on employee's job tasks. (PPE, confined spaces, respiratory protection, lockout tagout, blood borne pathogens, etc.). Training is conducted in accordance with the permit requirements. Training records were reviewed during the audit.
New employees training completed? (timeframe for completion)	Yes- Facility General Manager training records were observed through the online system
Records maintained on-site until closure/three years for former employees	Yes- records are stored electronically on WINWeb

**BIENNIAL HAZARDOUS WASTE REPORT (Refer to Permit Section I (E)(13)(f) & Section IV(M))**

Reports filed on a biennial basis	Yes
Date Received	02/21/22
Approved?	Yes

**CONTINGENCY PLAN (Refer to Permit Section IV(I) & Attachment D: Contingency Plan)**

Plan on-site	Yes
Date of plan	2/21/2022
Prepared by	Fuss & O'Neil
Report/summary of any incidents requiring implementation of the contingency plan	Chemical spills have been reported to local agencies
Plan sent to local authorities (police, fire, hospital, emergency response teams)	Yes- plan was sent to Burlington Health District, City of Bristol, CT, Capitol Region Emergency Planning Committee, Bristol Fire Department, Bristol Police Department, and Bristol Hospital
Emergency procedures (fire, explosions, releases/spills)	Included in plan
Emergency coordinator(s) name, address, home and office phone	Included in plan
Emergency equipment list location, description, capabilities	Included in plan
Evacuation plan (signal, primary and alternate routes)	Included in plan

**OPERATING RECORDS (Refer to Permit Section I (E)(10), Section III(A)(40) & Section IV(K))**

Are the following records maintained on-site:

Wastes received from off-site	Yes- electronic inventory system is used onsite
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Waste description	Yes
Wastes from on-site	Yes
Waste quantity	Yes
Methods of and dates of storage/treatment/disposal	Yes
Waste inventory (including type, volume & location): <ul style="list-style-type: none"> <li>• in storage</li> <li>• disposed of on-site (recorded on map)</li> <li>• cross-referenced to specific manifest</li> </ul>	Bar code system in place to track waste inventory
Analytical results for: <ul style="list-style-type: none"> <li>• permitted waste</li> <li>• monitoring wells</li> <li>• trial test (to assure compatibility with tanks, impoundments, or waste piles)</li> </ul>	No wells or waste piles onsite, per management. Bar code system is used to store and track waste information electronically.

**CLOSURE PLAN (Refer to Permit Section III(A)(45), Section IV(N), (O), and (P) & Attachment E: Closure Plan)**

Plan on-site	Yes
Date of plan	12/17/2021
Prepared by	Full & O'Neil
Have any regulated units closed?	No
<ul style="list-style-type: none"> <li>• If yes, is closure certified by owner/P.E.?</li> </ul>	NA
<ul style="list-style-type: none"> <li>• Is closure certification on-file at the DEEP?</li> </ul>	NA
<ul style="list-style-type: none"> <li>• Date of closure certification</li> </ul>	NA
Status of closure plan (approved and date)?	Unknown
Does plan include all regulated units (compare plan with Part A & on-site operations)?	Yes
Does plan include (indicate presence/absence, comment on adequacy): <ul style="list-style-type: none"> <li>• Estimate of maximum inventory</li> <li>• Description of how each unit will be closed &amp; methods to be used during closure</li> <li>• Description of steps needed to remove/decontaminate equipment/structures/soil:</li> <li>• Schedule for closure of each unit &amp; for final closure (time-frames &amp; milestones)</li> <li>• Closure/Post Closure cost estimates</li> </ul>	Yes- The plan reviewed is an updated plan (dated 12/17/21) which was sent to CT DEEP to address deficiencies in previously submitted Closure Plan.
*Estimate of expected year of final closure	Per the Closure Plan, the facility does not expect partial or final closure to commence prior to the year 2050.



(* Only needed for facilities without approved closure plans and for facilities, using a trust fund for financial assurance whose remaining operating life is less than 20 years)	
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**POST CLOSURE PLAN (Refer to Permit Section IV(N), (O), and (P) & Attachment E: Closure Plan)**

Plan on-site	NA
Date of plan	
Prepared by	
Status of Post-Closure plan (e.g., approved and date)	
Does plan include description and frequency of: <ul style="list-style-type: none"> <li>Monitoring activities</li> <li>Maintenance &amp; inspection activities (e.g., integrity of cap, ground water monitoring)</li> <li>Name, address, telephone number of post-closure contact</li> <li>Length of post-closure period</li> </ul>	
Certification to the Commissioner that notation on deed has been recorded?	
Record sent to the Commissioner of the type, location & quantity of hazardous waste disposed of in each cell/disposal unit?	

**FINANCIAL REQUIREMENTS FOR CLOSURE AND POST-CLOSURE (Refer to Permit Section IV(N), (O), and (P) & Attachment E: Closure Plan)**

\* NOTE: Surety bonds and letters of credit require the establishment of a standby trust agreement.

<b>CLOSURE COST ESTIMATE</b>	
• Estimate on-site	Yes
• Amount of estimate	\$4,205,064
• Date of most recent adjustment	July 2022
<b>FINANCIAL ASSURANCE FOR CLOSURE</b>	
• Type(s) of mechanism(s)	(circle all): trust fund, surety bond*, letter of credit*, insurance, financial test/corporate guarantee
• Amount of coverage	\$4,205,064
<b>POST-CLOSURE COST ESTIMATE</b>	
• Estimate on-site	NA
• Amount of estimate	NA
• Date of most recent adjustment	NA
<b>FINANCIAL ASSURANCE FOR POST-CLOSURE</b>	
• Type(s) of mechanism(s)	(circle all): trust fund, surety bond*, letter of credit*, insurance, financial test/corporate guarantee
• Amount of coverage	NA
<b>3<sup>rd</sup> PARTY LIABILITY INSURANCE</b>	
<b>Sudden</b> accidental occurrences (all TSDFs)	Yes – per Clean Harbors management
• Type(s) of mechanism(s)	(circle all): trust fund, surety bond*, letter of credit*, <u>Insurance:</u> Certificate of Insurance or HW Facility Liability Endorsement, financial test/corporate guarantee

<ul style="list-style-type: none"> <li>Does the financial mechanism provide at least \$1 million coverage per occurrence with an annual aggregate amount of at least \$2 million?</li> </ul>	Yes – per Clean Harbors management
<p><b>Non-sudden</b> accidental occurrences (impoundments landfills &amp; land treatment facilities)</p>	Yes – per Clean Harbors management
<ul style="list-style-type: none"> <li>Type(s) of mechanism(s)</li> </ul>	(circle all): trust fund, surety bond*, letter of credit, <u>Insurance</u> : Certificate of Insurance or HW Facility Liability Endorsement, financial test/corporate guarantee
<ul style="list-style-type: none"> <li>Does the financial mechanism provide at least \$3 million coverage per occurrence with an annual aggregate amount of at least \$6 million?</li> </ul>	Yes – per Clean Harbors management
<ul style="list-style-type: none"> <li>If the owner/operator must meet both liability standards and chooses to combine both coverage levels, does the financial mechanism provide at least \$4 million coverage per occurrence with an annual aggregate of at least \$8 million?</li> </ul>	Yes – per Clean Harbors management
Was the facility released of its RCRA closure/post-closure financial obligations? Identify	NA – active RCRA facility
<b>FINANCIAL ASSURANCE FOR CORRECTIVE ACTION</b>	
<ul style="list-style-type: none"> <li>Type(s) of mechanism(s)</li> </ul>	(circle all): trust fund, surety bond, letter of credit, <u>insurance</u> , financial test/corporate guarantee
<ul style="list-style-type: none"> <li>Amount of coverage</li> </ul>	\$146,695

**WASTE MINIMIZATION PROGRAM (Refer to Permit Section I (E)(15))**

Is a program in place? (if written program, obtain a copy)	Yes
<ul style="list-style-type: none"> <li>If yes, briefly describe the elements of the program and identify waste types and any reduction achieved</li> </ul>	The plan addresses potential waste minimization for onsite waste processing activities, truck to truck transfers, and releases. Reduction activities are not noted for the laboratory operations. The facility states that regular inspections are a means of identifying waste minimization opportunities for onsite waste processes and prevention of releases by keeping equipment operating as designed.
<ul style="list-style-type: none"> <li>If no, did the inspector recommend that the company: Assess their processes and waste streams for potential reductions in waste quantities</li> </ul>	
Assess their raw materials for less hazardous alternatives	NA
Assess their water usage for potential reductions	NA
Assess their energy usage for better efficiency	NA
Evaluate the potential for closed loop processes	NA

**USED OIL GENERATOR REQUIREMENTS (Refer to Permit Section IV(S))\***

Does the facility generate used oil at this site?	No used oil generated by the facility was observed on-site
Do other sites in the organization generate used oil that is then transferred to the facility?	No
• If yes, which sites?	
Is the generator's used oil mixed with other waste(s)?	NA

\* If applicable - additional used oil questions will be asked per CT DEEP LQG Sample Inspection Form. See Attachment H, J, and K for additional questions.

**SUBPART BB APPLICABILITY**

Does the generator have equipment (valve, pump, compressor, flange, pressure relief device, sampling connection system, or open-ended valve or line) that contacts hazardous waste with greater than 10% organic concentration?	<b>Subpart BB is not applicable at this site. No management or transfer of hazardous waste with volatile organic content &gt;500ppmw.</b>
<ul style="list-style-type: none"><li>If yes, does the generator claim that any of this equipment is exempt from Subpart BB due to &lt;300-hour annual use, being in vacuum service, or operating as a recycling unit?</li></ul>	NA
If an exemption is claimed, does the generator have documentation to support this claim, in accordance with 265.1064(k)?	NA
Has the facility implemented a leak detection and repair (LDAR) program required by the Clean Air Act?	NA
<ul style="list-style-type: none"><li>If yes, has the facility chosen to demonstrate compliance with Subpart BB by documenting compliance with the Clean Air Act, in accordance with 265.1064(m)?</li></ul>	NA

**SUBPART CC APPLICABILITY \***  
**(Refer to Permit Section IV(Q))**

**TANKS**

Does the generator manage hazardous waste with volatile organic concentrations $\geq$ 500 ppm/wt (on an average annual basis) in tanks?	<b>Subpart CC is not applicable to tanks at this site. No storage of hazardous waste with volatile organic content &gt;500ppm.</b>
<ul style="list-style-type: none"> <li>If yes, does the generator claim any exemptions from the requirements of this subpart?</li> </ul>	

**CONTAINERS**

Does the generator manage in containers (>26 gallons in size, non-satellite) hazardous waste with volatile organic concentrations equal or greater than 500 ppm/wt (on an average annual basis)?	Yes
Do the containers meet Department of Transportation ("DOT") requirements?	Yes
Are the containers closed?	Yes

\*If Subpart CC is applicable, an additional CT DEEP Subpart CC Checklist will be reviewed. See Attachment S for additional questions.

\*If waste is generated only in containers and the containers are closed and meet DOT requirements, Subpart CC Checklist is not required.

**AUDITOR OBSERVATIONS**

<p>Based on the site visit and results of this audit, comment on the adequacy of current staffing levels at the Bristol Facility in such areas as training, preparedness, procedures, etc., to prevent the numerous spills and incidents as well as violations of CT DEEP regulations occurring at this Facility. (Refer to Section V(4)(ix))</p>	<p>Staffing at this facility seems adequate. Employees are trained on emergency preparedness and spill response procedures and are familiar with site operations and permitting requirements.</p>
<p>Based on the site visit and observations made during this audit, does it appear that the Permittee operates, maintains and repairs the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, which could threaten human health or the environment? (Refer to Permit Section I(A))</p>	<p>Based on a review of site operations and employee conduct, the site has minimized the possibility of an environmental release or fire and has appropriate plans and controls in place.</p>
<p>General housekeeping observations: (Refer to Permit Appendix III-A)</p>	<p>The facility maintains good housekeeping practices, no specific concerns were identified</p>
<ul style="list-style-type: none"> <li>• Any areas not accessible during the visit?</li> </ul>	<p>No</p>
<ul style="list-style-type: none"> <li>• General condition of the epoxy floor coatings, painted areas designating storage limits, warning signs?</li> </ul>	<p>Hazardous waste satellite accumulation sign is missing in M1. The spill kit in M1 is not labeled. Drum crusher warning sign was painted over. Warning signs are missing in BULA and Container Storage building.</p>
<ul style="list-style-type: none"> <li>• Any pumps, hoses or other tools or equipment deployed in a work area, but not being used (left unattended)?</li> </ul>	<p>None observed</p>
<ul style="list-style-type: none"> <li>• The conditions and accessibility of logbooks?</li> </ul>	<p>Logs are maintained online and were easily accessible for review during the audit</p>
<ul style="list-style-type: none"> <li>• The condition and general appearance of the laboratory?</li> </ul>	<p>Lab has good housekeeping practices; no concerns were identified. See note below regarding lab containers.</p>
<ul style="list-style-type: none"> <li>• The general appearance and condition of container storage and truck to truck transfer areas?</li> </ul>	<p>The container and truck to truck transfer areas were in good condition.</p>
<ul style="list-style-type: none"> <li>• The general appearance and condition of secondary containment areas?</li> </ul>	<p>Secondary containment (epoxy floor treatment) is worn or damaged in several areas. A portion of slab cement in the mix-tub area is damaged due to wear and tear (Refer to photo log). Containment berm is damaged in M2.</p>

**ADDITIONAL ITEMS OF CONCERN:**

Lab sample containers do not have hazard communication warnings labeled on the containers. These containers are kept together. There is a potential for incompatible waste samples to be stored together.

**SUPPORTING INSPECTION DOCUMENTATION**

- Summary of Releases at the Facility
- Photography Log
- Log of Documentation, Plans, & Records Reviewed
- Log of Personnel Interviewed
- Log of Areas Inspected

**SUMMARY OF RELEASES AT THE FACILITY**  
Refer to Permit Appendix III-A & Section III(A)(44)  
List provided by Clean Harbors Management

<b>Date</b>	<b>Area of Release</b>	<b>Type of Vessel Involved</b>	<b>Cause of Release</b>
2019-10-07	Reactor 5	Release: Non- Transportation, None	Recirculation line broke and leaked out 1919 gallons of Chrome Acid into secondary containment (tank farm).
2020-02-17	in Bristol yard	Release: Non- Transportation, None	Metal recycling RO was about to be picked up. 3rd party driver cracked the door to release any residual water but green liquid water came out which hit for chrome water. Chrome had to of been from stainless steel. Used absorbent to soak up. 5 drums generated from decon. ~50 gallons of water used. Pulled confirmation sample of rinsate and came back clean. Re-trained guys on keeping bin closed.
2020-02-18	slot 4 of dock	Release: Non- Transportation, None	10 – 20 gallons of polychlorinated biphenyl (PCB)-contaminated material was discovered in a trailer, and the associated secondary containment system, located in Truck-to-Truck Parking slot #4
2020-04-15	dock	Release: Non- Transportation, None	release of an estimated 4 – 8 ounces of waste paint material was released into the secondary containment system of the Truck-to-Truck Transfer Dock. The source of the release was a 55-gallon drum with a small hole approximately 2 – 4 inches above the drum chime.
2020-04-24	dock	Release: Non- Transportation, None	estimated 8 – 12 ounces of waste chromic acid solution (D002, D007, and F019) was released onto the deckplate of trailer #5165 and into the secondary containment system of Truck-to-Truck Parking Slot #7. The source of the release was a lid seal on a 5-gallon container that was compromised in transit.
2020-05-18	Main Process Building	Release: Non- Transportation, None	estimated 1 gallon of hazardous waste material (D007) was released within the secondary containment system of the main process building. The source of the leak was a hairline crack, that formed during a transfer operation, in the offloading pipe that is used to transfer waste from the Bulk Loading/Unloading Area (BULA) to the treatment



			system.
2020-05-19	Tank 14	Release: Non- Transportation, None	estimated 45 gallons of used oil was released within the secondary containment system of Tank 14 (T14). The source of the leak was a valve that failed during setup for transferring the contents of T14 to a tanker truck for subsequent shipment to an off-site recycling facility.
2020-06-08	dock	Release: Non- Transportation, None	Truck to Truck Tech was trying to load a double stacked paint bins into an outbound van when the top bin fell over and leaked out 2 gallons of liquid.
2020-09-18	CSA A	Release: Non- Transportation, None	estimated 8 ounces of hazardous waste liquid (D003, D006, and F008) leaked from a cubic yard box shipping container onto the shipping pallet and into the secondary containment system of Container Storage Area (CSA) A, within the Container Storage Building of the referenced facility.
2020-09-20	dock. slot 6	Release: Non- Transportation, None	estimated 2 gallons of hazardous waste liquid (D001) leaked from a cubic yard box shipping container into the secondary containment system of slot 6 in the Truck-to-Truck Area.
2020-10-01	Truck Parking Area 3	Release: Non- Transportation, None	estimated 1/2-gallon of liquid hazardous waste leaked from a roll-off container transporting solid metals bearing waste (D004, D007, and D008). Although the container was covered, the small volume of liquid likely accumulated due to precipitation and subsequently leaked into the secondary containment system of Truck Parking Area 3.
2020-10-08	dock. slot 1	Release: Non- Transportation, None	estimated 1 gallon of waste oil/water (CR02) was released from a leaking cubic yard box shipping container onto the floor of a transfer trailer parked in Slot 1 of the Truck-to-Truck Area.
2020-10-19	dock. slot 1	Release: Non- Transportation, None	estimated 1/2-gallon of liquid hazardous waste was released from a leaking 55-gallon drum (D001, D018, D035, D039, D040, F003, and F005) onto the steel liftgate of a box truck parked in Slot 1 of the Truck-to-Truck Area.
2020-10-20	entrance to drum building	Release: Non- Transportation, None	Operator was moving consolidated latex paint bin to storage area. Took turn too fast and bin fell over leaking out ~1 gallon of NH material. Used speedi dry to clean up. Talked with

			employee about proper speed to move waste.
2021-01-13	dock. slot 1	Release: Non- Transportation, None	estimated 6 ounces of non-hazardous oily waste was released from the chime area of a 55-gallon drum onto the floor of a transfer trailer parked in Slot 1 of the Truck-to-Truck Area. The waste material was entirely contained inside the transfer trailer and did not leak into the secondary containment system of the Truck-to-Truck Area.
2021-03-12	dock. slot 1	Release: Non- Transportation, None	estimated 15 gallons of liquid hazardous waste was released from a leaking 55-gallon drum (D002) onto the steel liftgate and floor of trailer #6087 parked in Slot 5 of the Truck-to-Truck Area. The waste material also leaked into the secondary containment system of the Truck-to-Truck Area. The leak occurred due to accidental impact with a drum dolly which pierced the drum.
2021-04-19	dock	Release: Non- Transportation, None	estimated 1/2 gallon of oil-based waste paint was released within the secondary containment system of the Truck-to-Truck dock. The source of the release was a cubic yard box containing Paint Care Program waste that was punctured by a fork truck.
2021-05-06	dock	Release: Non- Transportation, None	estimated 6 ounces of waste corrosive liquid (D002) was released within the secondary containment system of the Truck-to-Truck dock. The source of the release was a loose bung on a 30-gallon drum that had fallen over in transit.
2021-05-24	dock	Release: Non- Transportation, None	Operator was attempting to double stack a pallet on the back of a van. When backing out of the van, the operator turned too quickly and lost the pallet. 55 gallon subsequently fell on ground with the bungs popping out and leaking out the contents
2021-05-25	dock. slot 4	Release: Non- Transportation, None	During morning inspection, found a CYB and a 55CF leaking on trailer. Overpacked the 55. Transferred contents of CYB to new CYB with absorbent.
2021-06-28	Tank 14	Release: Non- Transportation, None	20 gallons of state regulated oil leaked into tank farm after back pressure buildup in valve. Grease unexpectedly was in tank 14 and

			centrifugal pump could not transfer it leading to built-up pressure.
2021-07-28	dock	Release: Non- Transportation, None	estimated 50 gallons of non-halogenated waste solvent liquid (D001 and F003) was released within the secondary containment system of the Truck-to-Truck Area. The release was the result of a fork truck operator accidentally puncturing the 55-gallon waste solvent container while loading a tote during transfer operations.
2021-09-14	dock	Release: Non- Transportation, None	estimated 8 -12 ounces of waste mercuric chloride and water solution (D009) was released within the secondary containment system of the Truck-to-Truck Dock Area. The release was the result of a leaking cardboard fiber lab pack container.
2021-10-29	slot 3 of dock	Release: Non- Transportation, None	Operator was loading the attached drum from line 2 and when the drum was put on the floor of the slot 3 van, a nail was poking out. About a gallon of liquid went to the floor of the van
2021-11-09	slot 1 of dock	Release: Non- Transportation, None	2-4 ounces of the attached just leaked from lid. Looks like both 30s don't have a gasket. We overpacked both. Contaminated pallet and kitty litter from clean up to go into overpacks.
2022-01-12	dock	Release: Non- Transportation, None	Operator had a 55 gallon of Massachusetts regulated oil fall off pallet and leak into the slot 2 sump. 20 gallons was re-collected and re-put back into original container then overpacked.
2022-04-05	dock, slot 1	Release: Non- Transportation, None	estimated 12 ounces of state-regulated, non- RCRA, graphite lubricant/water waste (CR04) was released within trailer #6563, which was located in Slot 1 of the Truck-to- Truck Area (TTTA), and approximately 1 ounce was dripped on the surface of the loading dock. The release was fully contained within the trailer and on the surface of the loading dock surface and did not otherwise impact the secondary containment system of the TTTA. The release was the result of leaking lid gasket on a 55-gallon drum.

2022-04-08	dock, slot 4	Release: Non- Transportation, None	estimated 1/2 gallon of waste heptane and sulfonic acid solution (D001 and D002) was released within trailer #6560, located in Slot 4 of the Truck-to-Truck Area (TTTA). The release was fully contained within the trailer and did not impact the secondary containment system of the TTTA. The release was the result of improper closure of the 5-gallon shipping container.
2022-05-09	dock	Release: Non- Transportation, None	combined total of approximately 5 gallons of accumulated rainwater was discovered to have leaked out of 15 cubic yard boxes ("CYBs"), containing PaintCare Program waste, that were packed during a household hazardous waste collection ("HHW") event held in Yonkers, NY. The leak occurred within truck #5529 and trailer #6091, located in Slot 2 and Slot 1, respectively, of the Truck-to-Truck Area (TTTA). In addition, approximately 8 ounces of accumulated rainwater was discovered to have leaked out of one 55 gallon lab pack, containing pesticide waste that was packed during the same HHW event, within trailer #6091.
2022-06-07	dock, slot 1	Release: Non- Transportation, None	approximately 8 – 12 ounces of oil and water (CR02) waste was discovered to have leaked in-transit from a 55-gallon drum within truck #6594, located in Slot 1 of the Truck-to-Truck Area ("TTTA"). It appears the leak was a result of 2 small holes discovered near the closure bung of the container. The small amount of oil and water waste was fully contained within truck #6594 and did not impact the secondary containment system of the TTTA.
2022-06-29	dock	Release: Non- Transportation, None	approximately 6 milliliters of nonhazardous waste liquid leaked from a 55-gallon drum onto the secondary containment system of the Truck-to-Truck Area ("TTTA") Dock. It appears the leak resulted from a compromised lid gasket.

2022-08-03	dock	Release: Non- Transportation, None	approximately 6 ounces of state-regulated (CR05) nonhazardous waste sludge leaked from a compromised 55 -gallon drum onto the secondary containment system of the Truck-to-Truck Area ("TTTA") Dock.
2022-08-25	dock	Release: Non- Transportation, None	approximately 5-10 ounces of state-regulated (CR04) nonhazardous liquid waste leaked from a punctured 55-gallon drum inside truck #419009. The spill occurred as a result of the bottom of drum being inadvertently punctured by a tine on the drum dolly while attempting to off-load the drum to the Truck-to-Truck Area ("TTTA") Dock. The spill was entirely contained within truck #419009 and did not impact the secondary containment system of the TTTA Dock.



## Photography Log



Photo 1



Photo 2

Photography Log



Photo 3



Photo 4



Photography Log



Photo 5



Photo 6

Photography Log



Photo 7



Photo 8

Photography Log



Photo 9



Photo 10

## Photography Log



Photo 11



Photo 12

## Photography Log



Photo 13



Photo 14

Photography Log

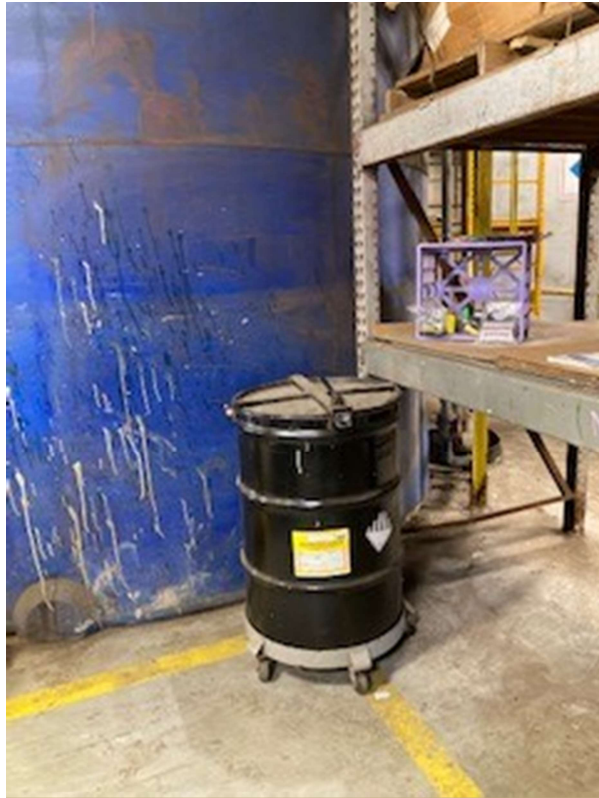


Photo 15



Photo 16

Photography Log



Photo 17



Photo 18

**LOG OF DOCUMENTATION, PLANS, & RECORDS REVIEWED**

Refer to Permit Appendix III-A & Section III(A)(44)(d)(i)(III)

<b>Documentation/Plan/Record Name</b>	<b>Specific pages reviewed</b>	<b>Specific dates reviewed (if applicable)</b>
Contingency Plan Distribution Cover Letters	All	7/12/2022; 7/13/2022; 7/25/2022
Rejected Manifests (including: 011906345FLE, 01222997FLE, 012832951FLE, 012837429FLE, 013544547FLE, 015901150FLE, 019685119JJK)	All	2017-2022
Spill report letters to DEEP	All	2019-2022
Clean Harbors of Connecticut RCRA (Hazardous Waste) Inspection Report Treatment/Storage/Disposal Facility (blank)	All	
2019 Biennial Report Acceptance email	All	7/27/2020
2021 Biennial Report Acceptance proof	All	2022
Land Disposal Restriction Notification Forms	All	6/30/2021 6/29/2021 7/6/2021
Approval of Compliance Schedule Item No. V(11), Third Party Auditor Selection	All	4/12/2022
Annual Inspection Log	All	2/9/2021
Financial Assurance Closure Cost Estimate Increase for Permit Modification	All	7/25/2022
Clean Harbors Audit form	All	no date
Clean Harbors Audit worksheet	All	no date
Clean Harbors of Connecticut Third Party Annual Audit Checklist (blank)	All	no date
CT DEEP RCRA (Hazardous Waste) Inspection Report	All	September 2014
Final Consent Order	All	4/25/2020
Revised Drawings submitted to DEEP	All	10/29/2021
Daily Inspection Log	All	6/14/2022; 9/14/2022
Daily TTT Inspection Log	All	9/14/2022; 10/14/2021
Employee Training Records	All	
Closure Plan	All	12/17/2021
Contingency Plan	All	11/29/2021
Inspection Plan	All	11/29/2021



Personnel Training Plan	All	11/29/2021
Final Permit	All	9/29/2021
CT DEEP LQG Inspection Report	All	no date
New Monthly Inspection Log	All	6/14/2022; 11/2/2021;
New Weekly Inspection Log	All	8/3/2021; 9/9/2022
Revised EPA Part A Form 8700-23	All	10/27/2021
Inventory	All	9/14/2022
Spill History	All	2019-2022
Tank 11 As-Built	All	2017
In Service Inspection Report of Tank 14	All	9/12/2017
CT DEEP TSDf Inspection Report(blank)	All	no date
Waste Analysis Plan	All	11/15/2021
Waste Minimization Plan	All	not dated
2019 Biennial Report	All	2019
2021 Biennial Report	All	2021



**LOG OF AREAS INSPECTED**

Refer to Permit Appendix III-A & Section III(A)(44)(d)(i)(III)

Location/Area
Area A/ 20.2 ft by 24.1
Area B #1/43.75 ft by 25ft
Area B #2/16.25 ft by 25 ft
Area C Within the Bulk Unloading and Loading Area/ 4.2 ft by 23.3
Area D/ 6 ft by 24.9 ft
Area E/ 18 ft by 21.4 ft
Area F/ 12ft by 24.1 ft
Area G/ 12 ft by 24.1 ft
Area J/ 26 ft by 34 ft
Area K/ 60 ft long by 2.6 ft wide by 2 ft deep
Area L/ 5.5 ft wide by 16 ft
Loading and Unloading Area (2 Tanker Truck Maximum)/ 55 ft by 11.25 ft
Area M1/ 55 ft by 13 ¾ ft wide by 1 ft deep
Area M2/ 25 ft long by 13 ¾ ft wide by 1 ft deep
Area H (9 areas)/ 2 areas, H1 and H2 – 25.3 feet x 5.625 feet, 2 areas, H3 and H4 –20.625 feet x 5.625 feet, 2 areas, H5 and H6 – 9.375 feet x 5.625 feet, 1 area, Area H7 – 14 feet x 5.625 feet, 1 area, H8 – 14 feet x 5.625 feet, 1 area, H9 – 30 feet x 5.625 feet
Tank 11/ 9 feet in diameter by 8 feet in height
Tank 14/ Not specified
Mix-Tub, Bulk Storage and Transfer Area/ 30.5 ft. wide by 122.5 ft. long
Drum Crusher
Drum Rinse Stations
Lap Pack Pour-Off
Loading/Unloading Dock/ 56 ft. long x 12 ft. wide
Each bay is 56 ft. long 12 ft. wide
Truck Parking Area 1 (5 truck bays)/ Each bay is 56 ft. long by 12 ft. wide
Truck Parking Area 3 (1 Truck Bay)/ The bay is 56 ft. long by 12 ft. wide

## **SUPPORTING AUDITING CHECKLISTS**

### **ADDENDUMS:**

ADDENDUM 1: Clean Harbors Audit Report Permit Section III

### **ATTACHMENTS\*:**

ATTACHMENT A: Import/Export requirements  
ATTACHMENT B: Spent Lead Acid Batteries Being Recycled  
ATTACHMENT C: Recycle/Reclaim  
ATTACHMENT D: Use Constituting Disposal  
ATTACHMENT E: Accumulation for Recycling  
ATTACHMENT F: Scrap Metals  
ATTACHMENT G: Precious Metal Recovery  
ATTACHMENT H: Used Oil – Collection Center & Aggregation Point Requirements.  
ATTACHMENT I: Used Oil – Transfer Facility Requirements  
ATTACHMENT J: Used Oil – Processor & Re-refiner Requirements  
ATTACHMENT K: Used Oil – Marketer Requirements  
ATTACHMENT N: Land Disposal Restriction – Treatment Facility Standards  
ATTACHMENT S: Subpart CC Requirements

\*Attachments have been developed based on the CT DEEP Official LQG Sample Inspection Forms. The checklists included within these attachments will be completed if the scope is applicable to the Clean Harbors facility.

**ADDENDUM 1**  
**Clean Harbors Audit Report Permit Section III**

SECTION III

OPERATING CONDITIONS

COMMERCIAL HAZARDOUS WASTE FACILITY PERMIT RENEWAL  
CLEAN HARBORS OF CONNECTICUT, INC.  
51 BRODERICK ROAD  
BRISTOL, CONNECTICUT 06010

EPA ID No. CT000604488  
Permit Number: DEEP/HWM-017-004

**SECTION III  
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### SECTION III OPERATING CONDITIONS

#### (A) CONDITIONS REGARDING THE FACILITY AND ALL WASTE MANAGEMENT AREAS

In addition to any other requirements of this Permit, the Permittee shall comply with the following requirements regarding the Facility, including the Waste Management Areas at the Facility:

##### *General Conditions*

- (1) The Permittee shall:
- (a) Operate the Facility so as to prevent any waste or other material from potentially causing or resulting in a hazard to human health or the environment (e.g., fires, explosions, toxic fumes); Yes
  - (b) Ensure that all waste or other materials in the Waste Management Areas is secure and remains inaccessible to unauthorized persons; and Yes
  - (c) Prevent unknowing entry or entry by unauthorized persons at the Facility; and Yes
  - (d) Ensure that at all times there is a single point of contact from the Facility who:
    - (i) Is aware of the waste or other materials at the Facility, including, but not limited to, the hazards posed by such waste or other materials; and Yes
    - (ii) Can authorize response actions in the event of a release or emergency condition at the Facility. Yes
- (2) The Permittee shall, at all times, provide a safe working environment for employees at the Facility. At a minimum, the Permittee shall ensure that:
- (a) There is adequate ventilation in each Waste Management Area; and Yes
  - (b) Whenever Facility personnel may be potentially exposed to wastes or other materials, appropriate personal protective equipment is utilized, as specified by, but not be limited to, the Safety Data Sheets (SDSs, formerly known as MSDSs), or by the National Institute for Occupational Safety and Health (NIOSH). Yes
- (3) The Permittee shall not transport, load, unload, transfer, treat, manage, or handle any waste or other materials, within, over or on any area of the Facility that has bare soil or unprotected surfaces. In addition, the Permittee shall maintain all traveled surfaces at the Facility in good repair so that such surfaces can withstand the mechanical stress of traffic to which they are subjected and prevent damage to containers and spillage of waste or other materials during the use of such surfaces. For purposes of this provision, asphalt shall not be considered an "unprotected surface." Yes



- (4) The Permittee shall transport containers of waste at the Facility using forklifts, hand trucks and/or other equipment capable of transporting such containers. Yes
- (5) The Permittee shall ensure that no waste placed in or brought to the Truck Parking Area is then placed in or brought to any other Waste Management Area at the Facility, other than the Truck-to-Truck Transfer Area. This provision includes, but is not limited to, a roll-off container or a Transportation Vehicle. Yes
- (6) Except as provided for in this provision, the Permittee shall ensure that no waste brought to, placed in or from the Mix-Tub, Bulk Storage and Transfer Area, Container Storage Area, Tanks Systems 11 or 14, Bulk Unloading and Loading Area, or Area to Stage Containers is then brought to or placed in the Truck Parking Area. This provision includes, but is not limited to, waste in a roll-off container or a Transportation Vehicle, except that a roll-off container with waste from the Mix-Tub, Bulk Storage and Transfer Area, may be brought to the Truck Parking Area provided that any such roll-off container:
- (a) Does not contain waste that under this Permit is prohibited in the Truck Parking Area; Yes
  - (b) The storage time that is brought to or placed in the Truck Parking Area in the normal course of transportation (i.e., for shipment off-site, not temporary storage) that shall not exceed twenty-four (24) hours; Yes
  - (c) After being brought to or placed in a Truck Parking Area, the waste shall not be brought back to or placed in any Waste Management Area at the Facility; and Yes
  - (d) Once brought to the Truck Parking Area, the waste remains subject to all the requirements regarding waste in the Truck Parking Area. Yes
- (7) The Permittee shall prevent damage to containers of waste or other materials due to freezing or low temperatures and shall protect such waste or other materials from high temperature. Yes
- (8) The Permittee shall ensure that all transporters that enter the facility comply with RCRA Section 22a-449(c)-11 and RCRA Section 22a-449(c)-103 with respect to the transportation of hazardous wastes. Yes
- (9) The Permittee shall not manage waste or other material at the Facility in a manner that does or could:
- (a) Generate extreme heat or pressure, fire, explosion, or violent reaction;
  - (b) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
  - (c) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion;
  - (d) Damage the structural integrity of the item used to contain such waste or other material; or
  - (e) Through other like means, threaten human health or the environment. Yes

### *Training*

- (10) The Permittee shall ensure that all wastes or other materials at the Facility are handled or managed by personnel who have completed all of the required training specified in the Personnel Training Plan (PTA) presented herein as Attachment C to this Permit. The PTA requires approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit. Yes
- (11) The Permittee shall ensure that the transfer of containers and roll-off containers of waste or other materials is performed by appropriately trained personnel, experienced in the use of such equipment and techniques, as specified in the Personnel Training Plan presented herein as Attachment C to this Permit. The PTA requires approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit. Yes

### *Condition of Containers, Including Transportation Vehicles and Roll-Off Containers*

- (12) If a container or a roll-off container holding waste or other materials is not in good condition (e.g., there is severe rusting, cracks, apparent structural defects or bulging) or begins to leak, the Permittee shall immediately place the compromised container in a salvage container that is in good condition and complies with 49 CFR Part 173, or transfer the waste or other material from such container or roll-off container to a container that is in good condition and complies with 40 CFR Part 173. The Permittee shall manage, including disposal, all waste generated from a container or roll-off container that is not in good condition in accordance with this Permit and all applicable requirements. Yes
- (13) The Permittee shall ensure that no container or roll-off container of waste or other material has any superfluous waste, liquids, sludge, or solids on the exterior of such container. This does not include dried paint or similar material and dirt/dust. Yes
- (14) The Permittee shall ensure that each container or roll-off container with waste or other materials at the Facility is made of or lined with materials that will not react with, and are compatible with the waste or other materials so as not to impair the ability of such container to contain such waste or other materials. The Permittee shall ensure that only containers or roll-off containers that have been approved by DOT for use with a given waste or other material are brought to or used at the Facility. Yes

### *Spills, Releases, and Accumulated Liquids*

- (15) The Permittee shall operate the Facility in a manner that minimizes the possibility of spills or releases of waste or other materials. The Permittee shall manage and maintain all Waste Management Areas within the Facility to prevent run-on into such area and prevent spills, releases, or accumulated liquids, including, but not limited to, precipitation from escaping a Waste Management Area. No
- (16) The Permittee shall remove all spilled or leaked waste or any liquids, including, but not limited to precipitation, that accumulates in any Waste Management Area or containment area, including any secondary containment area. The Permittee shall remove such waste or liquid immediately upon detection, but in no event Yes

later than twenty-four (24) consecutive hours from the time, such waste or liquid should have been discovered. The Permittee shall ensure that any such spillage, leakage or liquid remains within the secondary containment area of a Waste Management Area. Notwithstanding the foregoing, if on a Saturday, Sunday or a federal holiday observed by Clean Harbors and the Facility is closed, except for the potential receipt of waste or other materials from an emergency, if precipitation accumulates in a Waste Management Area, including a secondary containment area, provided all precipitation remains within the secondary containment area, the Permittee shall have until the end of the next business day when the Facility is open to remove such precipitation. All collected material from these events must be sampled and analyzed for proper disposal pursuant to Section III(A)(17) of this Permit.

- (17) The Permittee shall manage all spilled or leaked waste or any liquid, including, but not limited to, precipitation removed from a Waste Management Area as a hazardous waste, unless the Permittee demonstrates that such waste or liquid is not a hazardous waste pursuant to 40 CFR 262.11. If not required to be managed as a hazardous waste, the Permittee shall manage all such waste or liquid in accordance with this Permit and all applicable requirements. Yes
- (18) (a) The Permittee shall immediately notify the Commissioner using CT DEEP's Emergency Response & Spill Prevention Division (ERSPD) 24-hour telephone number 860-424-3338 or, if that number is unavailable, at 860-424-3333, or toll free at 1-866-337-7745, of:
- (i) Any spill or release at the Facility, including, but not limited to, a leak from any container whose integrity has been compromised; or
  - (ii) Any evacuation of the Facility for any purpose.
- (b) The Permittee shall immediately notify the Director of the Waste Engineering and Enforcement Division ("WEED") by email at [DEEP.WEEDNotification@ct.gov](mailto:DEEP.WEEDNotification@ct.gov) of:
- (i) Any partial shutdown of the Facility that substantially disrupts normal operations for more than twenty-four hours; Yes
  - (ii) Any inability, for any period of time, to receive waste at the Facility; or
  - (iii) Any significant threat to human health or the environment.
- (c) In addition to the provisions of Section III(A)(18)(a) of this Permit, the Permittee shall comply with all other applicable reporting or notification requirements regarding any spill or release at the Facility, including but not limited to, requirements under section 22a-450 of the CGS and 40 CFR Part 302. Yes
- (19) (a) In addition to any other information that may be required by the ERSPD, within fifteen (15) calendar days of a spill or release at the Facility, the Permittee shall submit a written report containing the following information to the Director of WEED: Yes

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| (i)   | Likely route of migration of the spill or release;  | Yes |
| (ii)  | Characteristics of the surrounding soil (soil composition, geology, hydrogeology, etc.);  | Yes |
| (iii) | Results of any monitoring or sampling conducted in connection with the spill or release (if available). If sampling or monitoring data relating to the spill or release are not available within fifteen (15) calendar days, such data shall be submitted to ERSPD and WEED as soon as they become available; | Yes |
| (iv)  | Proximity to down gradient drinking water wells, surface water, populated areas, wetlands or other environmentally sensitive areas, and habitat for endangered or threatened species; and   | Yes |
| (v)   | Description of all response actions taken or planned.   | Yes |
| (b)   | The Permittee shall maintain copies of all reports required under Section III(A)(19)(a) of this Permit and all subsequent reports filed with the Department regarding each such incident in the Operating Record until Final Closure of the Facility.   | Yes |

### *Inspections*

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| (20) | The Permittee shall inspect the Facility, each Waste Management Area and all safety equipment, emergency response equipment, security devices and operating and structural equipment to prevent releases and to ensure such equipment remains in good working order, the safe operation of the Facility and compliance with this Permit. At a minimum, the Permittee shall perform inspections in accordance with the Inspection Plan (IP) presented herein as Attachment B to this Permit. The IP requires approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit. The Permittee shall respond as soon as possible to any problem or deficiency identified by any such inspection. | Yes |
| (21) | The Permittee shall record inspections of each Waste Management Area in an inspection log. This log shall include the date and time of the inspection, the name of the inspector, company affiliation if by a company other than Clean Harbors, a notation of the observations made, and the date and nature of any repairs or required actions. The inspection log shall be maintained in the Operating Record for the Facility.   | Yes |

### *Traffic Control and Vehicles Idling*

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| (22) | The Permittee shall control all traffic related to the operation of the Facility in such a way as to mitigate the queuing of vehicles and prevent excessive or unsafe traffic impacts in the area where the Facility is located. | Yes |
| (23) | The Permittee shall prominently post and maintain signs in appropriate areas warning that trucks at the Facility cannot idle for more than three (3) consecutive minutes, pursuant to RCSA Section 22a-174-18(b)(3).             | Yes |

### Signage

- (24) The Permittee shall post a sign with the legend, “Danger—Unauthorized Personnel Keep Out”, at each entrance to the Facility, and at other locations, in sufficient numbers to be seen from any approach to the Facility. The legend must be written in English and in any other language predominant in the area surrounding the Facility and shall be legible from a distance of at least 25 feet. The Permittee may use signs with a legend other than “Danger—Unauthorized Personnel Keep Out” to comply with this provision, provided such posting otherwise meets the requirements of this provision and the legend on the sign clearly indicates that only authorized personnel are allowed to enter onto the Facility property and that entry onto the Facility property can be dangerous. Yes

### Secondary Containment Requirements

- (25) The Permittee shall ensure that:
- (a) Each Waste Management Area has a secondary containment system that is capable of:
    - (i) Containing any spills, leaks, precipitation, or other liquids; Yes
    - (ii) Preventing run-on into and run-off out of such system; and Yes
    - (iii) Ensuring that any waste or other materials in such Waste Management Area does not come in contact with any liquids, from spills, leaks, precipitation or otherwise, collected in the secondary containment system; Yes
  - (b) The following secondary containment systems are capable of containing the following amounts (The required secondary containment capacities are also specified in Table II-1 of this Permit):
    - (i) Container Storage Areas:
      - Area A – 350 gallons
      - Area B – 1,848 gallons
      - Area C – 350 gallons
      - Area D – 350 gallons
      - Area E – 660 gallons
      - Area F – 350 gallons
      - Area G – 350 gallons
      - Area J – Solid waste only
      - Area K – 539 gallons
      - Area L – 350 gallons;Yes
    - (ii) Bulk Unloading and Loading Area – 6,600 gallons; Yes
    - (iii) Areas to Stage Containers: Yes
      - Area M1 – 682 gallons
      - Area M2 – 495 gallons;

	Area H – self-containment pallets that can contain 10% of the volume of all containers on a pallet or 100% of the largest container, whichever is greater;	No
(iv)	Tanks Systems:  Tank 11 – 29,539 gallons Tank 14 – 29,539 gallons;	Yes
(v)	Mix-Tub, Bulk Stage and Transfer Area – 18,829 gallons;	Yes
(vi)	Truck-to-Truck Transfer Area:  Loading Dock – 549 gallons Each Truck Bay- 549 gallons, except for Truck Bay #3 – 1,110 gallons	Yes
(vii)	Truck Parking Areas No. 1 and 3:  Truck Parking Area #1, Each Truck Bay – 549 gallons plus the calculation for a 25-year, 24-hour storm event.  Truck Parking Area #3 – 549 gallons plus the calculation for a 25-year, 24-hour storm event.	Yes
(c)	For purposes of determining compliance with Section III(A)(25)(b) of this Permit, the Permittee shall include any device or structure within a Waste Management Area that displaces the secondary containment volume capacity of such area.	
(26)	The Permittee shall ensure that the strength of the secondary containment system in any Waste Management Area is sufficient to prevent failure owing to pressure gradients, physical contact with the waste, climatic conditions, and the stress of the Facility operation.	No
(27)	The Permittee shall ensure that whenever a container, roll-container, Transportation Vehicle, including a Vacuum Truck, with waste or other materials is in or is being managed in a Waste Management Area, that the entire container, roll-off container, or vehicle is wholly within the secondary containment area for such Waste Management Area. This includes, but is not limited to, waste being emptied into the Mix-Tub or stored in the Mix-Tub Bulk Storage and Transfer Area.	Yes
(28)	The Permittee shall ensure that at closure of any Waste Management Area, all waste and waste residues are removed from the secondary containment system of such area. In addition, the Permittee shall ensure that any areas of the base, liners, and/or soil containing or contaminated with waste or waste residues are decontaminated or removed and that the Permittee complies with the Closure Plan presented herein as Attachment E of this Permit. The Closure Plan requires approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit	Yes

*Base and Berm Requirements for Secondary Containment Systems*

- (29) The Permittee shall ensure that the base and berm of the secondary containment in each Waste Management Area is free of cracks or gaps and is sealed with a chemical resistant, impermeable coating compatible with all waste or other material in such a Waste Management Area such that the secondary containment system will contain leaks, spills or other liquids, including, but not limited to, precipitation. At a minimum:
- (a) The application of a chemical resistant impermeable coating shall be in conformance with the manufacturer's specifications. Prior to applying the coating, the Permittee shall inspect the Waste Management Area. If visible residue or any other material that could affect the performance of the coating is found, the residue and material shall be removed in accordance with Section III (A)(30) of this Permit; and
- (b) When there are gaps or cracks in a secondary containment system or a Waste Management Area's coating is in need of repair or application, the Permittee shall follow the procedures in Section III (A)(30), (A)(31), (A)(32) and (A)(33) of this Permit.
- (30) Whenever the integrity of a Waste Management Area's base, berm or coating specified in Section III (A) (29) of this Permit is impaired or in need of repair or re-application, the Permittee shall:
- (a) Remove all waste and other materials from the Waste Management Area or affected portion thereof, as necessary;
- (b) Inspect the area for the presence of visible residue (stains, debris, and wetness) and if visible residue is found, remove the residue by scrubbing, and washing, and/or scarifying, as necessary. When removing residue, the Permittee shall only use materials that are standard in the industry for such purpose. The removed residue shall be samples and analyzed for disposal;
- (c) Determine the nature and extent of the impairment;
- (d) Repair the affected area, or repair and/or reapply the coating of the affected area as soon as possible, but not later than thirty (30) calendar days after the Permittee discovers that the integrity of the area or of the coating has been impaired or is in need of repair, except that if repairs to a Waste Management Area located outdoors cannot be completed in thirty (30) calendar days, the Permittee shall provide "alternate" secondary containment (e.g., containment pallets or a temporary liner such as a catch basin mat) for all waste or other materials in the affected area until the necessary repairs have been completed. A record of this alternate secondary containment measure, the extent of impairment noted and the reason for and length of delay in re-application of coating shall be made and maintained in the Operating Record until Final Closure of the Facility.

- (31) The Permittee shall not use or place waste or other materials in a Waste Management Area, or any portion thereof, in which the integrity of the secondary containment is impaired or under repair. If only a portion of the secondary containment in a Waste Management Area is impaired or in need of repair or coating reapplication, the Permittee may continue to use other portions of the same Waste Management Area provided that:
- (a) The secondary containment in these other portions is not impaired, on in need of repair or coating reapplication; and No
- (b) Before the Permittee uses any portion of the Waste Management Area, the Permittee shall take all the necessary measures to ensure that waste or other material does not or cannot migrate to any portion of the Waste Management Area where the secondary containment is impaired, or is in need of repair or coating reapplication. No
- (32) When the integrity of the secondary containment system of a Waste Management Area is impaired or has been repaired or coating reapplied, the Permittee shall record in the Operating Record for the Facility the following information, to be kept until Final Closure of the Facility:
- (a) The location of the Waste Management Area requiring repair or coating reapplication; Yes
- (b) The type and degree of repair or coating reapplication needed; Yes
- (c) The method(s) of repair or reapplication; Yes
- (d) The date the need for the repair or coating reapplication was noticed; Yes
- (e) The date(s) all repair(s) were made or coating(s) reapplied; and Yes
- (f) The name, title and identity of the person who determined that the repair or coating reapplication was sufficient to allow the Waste Management Area or portion thereof to be used again and the date of such inspection and any comments of the inspector regarding the repair or coating reapplication. Yes
- (33) Before resuming use of a Waste Management Area requiring repair or reapplication of a coating, the Permittee shall ensure that the area is free of cracks or gaps and the area's coating is sufficiently impervious to contain leaks and/or spills, including inspection of the berm and base of the Waste Management Area to ensure the integrity of the coating Yes

*Provisions Regarding Wastes or Other Materials that are Prohibited at the Facility*

- (34) Prior to bringing, placing or allowing any wastes or other materials into the Facility, the Permittee shall determine that such waste or other materials is authorized to be brought to the Facility and can be properly managed in accordance with the terms and conditions of this Permit. The information used to comply with this provision shall be maintained in the Operating Record for the Facility until final closure of the Facility. Yes



At a minimum, the Permittee shall:

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| (a)  | Determine whether each waste or other material is prohibited by Section II or any other provision of this Permit;  | Yes |
| (b)  | Determine the applicable degree of hazard as defined in the Waste Analysis Plan (WAP), presented herein as Attachment A to this Permit (The WAP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit) for each waste or other material;  | Yes |
| (c)  | Characterize each waste or other material in accordance with the parameters specified in the WAP, presented herein as Attachment A to this Permit (The WAP requires approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit). In addition to any requirements in such Waste Analysis Plan, for each hazardous waste identified with the EPA hazardous waste code D003, reactive wastes, the Permittee shall determine under what provision of 40 CFR 261.23 (i.e., 40 CFR 261.23 (a)(1) or 261.23(a)(2), etc.) the waste is considered reactive and the basis for the Permittee's determination, and shall maintain in the Operating Record of the Facility the basis for its determination, including but not limited to any waste profile sheets, sampling or other data upon which the Permittee's determination under this provision regarding such waste was made; and | Yes |
| (d)  | Determine that the Contingency Plan will adequately address all potential hazards posed by each waste or other material, specifically the suitability and compatibility of the waste or other material with personal protective equipment ("PPE") (e.g., boots, gloves, suits), availability of appropriate respiratory protection and emergency response equipment, monitoring equipment (e.g., explosion detection equipment, vapor analyzers, dragger tubes) and other relevant equipment at the Facility, including necessary response procedures by, at a minimum, identifying the PPE required to properly handle the waste or other material, and identifying the appropriate response procedures for handling incidents involving the waste or other material.   | Yes |
| (35) | The Permittee shall not allow any waste or other material that is prohibited under Section II of this Permit to enter or be accepted at the Facility;  |     |
| (36) | (a) When waste or other materials first arrives at the entry gate to the Facility the Permittee shall:   |     |
|      | (i) Review all manifests or other shipping papers to determine if the waste or other material is prohibited under Section II of this Permit from being accepted at the Facility; and   | Yes |
|      | (ii) Record and retain in the Operating Record for the Facility the date and time, such waste or other material arrived at the Facility.   | Yes |

- (b) The time when waste or other material first arrives at the Facility shall be used to determine compliance with the six (6) consecutive hour limit in Section III(A)(39)(a) of this Permit, the seventy-two (72) consecutive hour limit in the Truck-to-Truck Transfer Area, the two-hundred-forty (240) consecutive hours limit in the Truck Parking Area, and the thirty (30) calendar days limit for storage in the Mix-Tub, Bulk Storage and Transfer Area, and any other similar timeframe required under this Permit, unless another timeframe is specified in this Permit. Yes
- (37) (a) If a container of waste or other materials, not apparent on the manifest or shipping paper (i.e., an extra container not on a manifest is on a Transportation Vehicle), is received at the Truck-to-Truck Transfer Area or in a lab pack container brought to Staging Area H, the Permittee shall:
- (i) Place such waste or other material in a separate Staging Area H on a containment pallet. The Permittee shall not place any other waste or other material in such staging area until the waste or other material in question has been identified. The Permittee shall record in the Operating Record for the Facility the date and staging area into which such waste or other material was placed; and Yes
- (ii) Have five (5) calendar days from the date of discovery of any such waste or other material to determine the identification of such waste or other material and whether or not it can be managed at the Facility. Yes
- (b) If the Permittee is able to identify the waste or other material specified in Section II (A) (37) (a) of this Permit and determines that such waste or other material:
- (i) Can be managed at the Facility in accordance with the terms and conditions of this Permit, the Permittee shall so manage the waste or other material and shall also retain in the Operating Record of the Facility documentation that identifies the waste or other material in question, where and when it was discovered at the Facility, who generated the waste or other material, and how a determination of the identification of such waste or other material was made; or Yes
- (ii) Cannot be managed at the Facility, the provisions of Section III (A) (38) of this Permit shall apply to such waste or other material. Yes
- (c) If the Permittee is not able to identify the waste or other material specified in Section II (A) (37) (a) of this Permit, the Permittee shall analyze the waste to determine the constituents of such waste. If based on such analysis the Permittee determine that the waste or other material:
- (i) can be managed at the Facility in accordance with the terms and conditions of this Permit, the Permittee may so manage such waste or other material and shall also retain in the Operating Record of the Facility documentation that identifies the waste or Yes

- other material in question, where and when it was discovered at the Facility, and the results of the analysis used to identify the waste or other material; and Yes
- (ii) cannot be managed at the Facility, the provisions of Section III (A) (38) of this Permit shall apply to such waste or other material. Yes
- (38) If a review of manifests or other shipping papers for a waste or other material does not reveal that such waste or other material is prohibited under Section II of this Permit and such waste or other material inadvertently enters the Facility or is brought to a Waste Management Area:
- (a) Immediately after the Permittee determines or reasonably should have determined that such waste or other material is prohibited from the Facility or from a Waste Management Area by this Permit, the Permittee shall:
- (i) comply with all applicable requirements, including, but not limited to, the compatibility requirements in 40 CFR Part 264, Appendix V; and Yes
- (ii) place such waste or other material in an area with secondary containment and ensure that such waste remains in an area with secondary containment until such waste is removed from the Facility; and Yes
- (b) No later than twenty-four (24) hours after the Permittee determines or reasonably should have determined that a waste or other material is prohibited under Section II of this Permit, the Permittee shall remove such waste from the Facility. The Permittee may, for good-cause, request, in writing, that the Commissioner extend this twenty-four (24) hour period. If at the expiration of this 24 hour period, pursuant to 3-6a of the CGS, the Governor has declared an emergency prohibiting the use of the roads, the Permittee shall remove such prohibited waste or other material from the Facility no later than two (2) consecutive hours after the Governor declares that the emergency is over and use of the roads is Permitted. The Permittee shall comply with all applicable requirements regarding any waste or other material that is prohibited under Section II of this Permit and removed from the Facility pursuant to this provision. Yes

*Termination of Manifest or Shipping Paper*

- (39) The Facility shall be the Designated Facility on the manifest or similar shipping paper, terminating any such manifest or similar shipping paper, for all waste or other materials brought to any Container Storage Area, any Area to Stage Containers, the Bulk Unloading and Loading Area, and the Mix-Tub, Bulk Storage and Transfer Area, i.e., any waste or other material that does not remain solely within the Truck-to-Truck Transfer Area or the Truck Parking Area. Yes

*General Tracking of Waste or Other Materials at the Facility*

- (40) In addition to any other recordkeeping requirements of this Permit, the Permittee

shall record and maintain in the Operating Record of the Facility until final closure of the Facility:

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| (a)   | A waste profile sheet or a document with the equivalent information for each waste or other material brought to or placed in the Facility;  | Yes |
| (b)   | An inventory of each waste and other material brought to, stored, treated, or managed at the Facility, including an inventory of each waste and other material currently at the Facility; and   | Yes |
| (c)   | A record of the date and time that each waste or other material was placed into a Waste Management Area, moved from one Waste Management Area to another Waste Management Area and was taken off-site or removed from the Facility. In addition:  | Yes |
| (i)   | For waste or other material in containers in the Container Storage Area, the Area for Staging Containers, the Mix-Tub, Bulk Storage and Transfer Area and the Bulk Unloading and Loading Area, this record shall include the date each container entered or exited such area and how long such container has been in any such area; | Yes |
| (ii)  | For waste or other material in the Truck Parking Area, this record shall include the date and time when such waste or other material on a Transportation Vehicle entered or exited such Area;   | Yes |
| (iii) | For waste or other material in the Truck-to-Truck Transfer Area, this record shall include:   | Yes |
| (I)   | The date and time when such waste or other material on a Transportation Vehicle entered or exited such area;  | Yes |
| (II)  | The date and time each container was removed from a Transportation Vehicle; and   | Yes |
| (III) | The date and time each container was placed on a Transportation Vehicle;  | Yes |
| (iv)  | For Tanks 11 or 14, this record shall include the date each time waste or other material was transferred into such tanks and the amount and identity of such waste or other material;   | Yes |
| (v)   | For waste or other materials being moved or transferred this record shall include the type and quantity of waste or other material moved or transferred and the name of the person who authorized such movement or transfer.  | Yes |
| (41)  | Before bringing any waste or other material to a Waste Management Area, the Permittee shall conduct a compatibility evaluation and shall ensure that the transfer or movement of waste or other materials does not violate the compatibility requirements of this Permit.   | Yes |

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| (42) | Before moving or transferring any waste or other material to or from a Waste Management Area to another Waste Management Area, the Permittee shall:  | Yes |
| (a)  | Conduct a hazardous waste characterization and verification in accordance with the WAP presented as Attachment A to this Permit (The WAP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit), if required; and   | Yes |
| (b)  | Verify compliance with Section III (A) (41) of this Permit.  | Yes |
| (43) | The Permittee shall ensure that the manifest or shipping paper that accompanies each waste or other material brought to the Facility includes the identification of each waste or other material by using the DOT description (including proper shipping name, hazard class, identification number, and packing group, if any). For each waste or other material present at the Facility the Permittee shall retain the manifest or similar shipping paper used when such waste or other material was brought to the Facility and shall utilize a record keeping system capable of providing such manifest of similar shipping paper upon request. The Permittee shall retain the manifest or similar shipping paper accompanying each waste or other material brought to the Facility in the Operating Record for the Facility. | Yes |

*Audits*

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| (44) | (a) No later than six (6) months after this Permit takes effect, and once each calendar year thereafter, the Permittee shall retain the services of a third-party consultant qualified to conduct an audit of the Facility as specified in Condition III(44)(b) below. No audit shall be conducted within 180 calendar days of a prior audit.   | No  |
|      | For purposes of this provision a “third-party consultant,” (including the person(s) conducting the audit and the entity employing such person(s)) shall mean a consultant that:   | Yes |
|      | (i) Is not a subsidiary of affiliated corporation of the Permittee;   | Yes |
|      | (ii) Other than through mutual funds or other similar indirect means, does not own stock in the Permittee or any parent, subsidiary, or affiliated corporation;   | Yes |
|      | (iii) Is not otherwise engaged by the Permittee to prepare documents or implement or oversee any other actions required by this Permit;   | Yes |
|      | (iv) Has no history of participation in any previous contractual agreement, and no anticipated future contractual relationships, other than a contract to perform audit under Section III(A)(41) of this Permit, with the Permittee or any parent, subsidiary, or affiliated corporation, which, in the Commissioner’s judgment and after full disclosure of such participation, would affect the consultant’s ability to exercise the independent judgment and discipline required to conduct the required audit(s); | Yes |
|      | (v) Has no other direct financial stake in the outcome of the audit(s)  | Yes |

- required by this Permit; Yes
- (vi) Is knowledgeable in the requirements of RCRA and DOT; Yes
- (vii) Has at least three years of experience auditing facilities like the Permittee's; and Yes
- (viii) At the time the audit is conducted, has a valid and effective
- (I) license as a Professional Engineer issued by the State of Connecticut; or No
- (II) certification as a Certified Hazardous Materials Manager issued by the Institute of Hazardous Materials Management. Yes
- If the Commissioner determines that the person(s) conducting the audit or the entity employing such person is unsatisfactory, the Commissioner shall provide the Permittee with a written statement of the reasons for such determination and the Permittee shall not utilize such person(s) or the entity employing such person for any future audit.
- (b) In the third quarter of the year 2022, and once each calendar year thereafter, the third-party consultant shall audit the Permittee's compliance with the requirements of this Permit, compliance with all applicable statutes and regulations regarding waste and 49 CFR Parts 171 to 180, inclusive (Hazardous Materials Regulations) and if not otherwise included, the items listed in the "Specific Items to be Included in Third-Party Audits" in Appendix A to Section III of this Permit. Before conducting the audit, the third-party consultant shall develop an audit checklist that shall be used to perform the audit and review the terms and conditions of this Permit. Yes
- (c) As soon as possible, but not later than thirty (30) calendar days after completion of each third party consultant audit as required by this Permit, the Permittee shall take prompt action to address any problems and correct each and every violation discovered during any such audit and certify that the Facility has been brought back into compliance as to any violations discovered during the audit and retain documentation demonstrating such compliance. If the Permittee determines that the correction of any problem or requires more than thirty (30) days to complete, the audit report submitted to the Commissioner pursuant to Section III(A)(45)(d) of this Permit shall include a detailed written plan for correcting the problem or violation, including but not limited to, a schedule to complete any such action.
- (d) Not later than forty-five (45) calendar days after completion of each audit performed by a third-party consultant required by this Permit, the Permittee shall:
- (i) Submit to the Commissioner a detailed written report of the results of the audit signed, in accordance with Section I (E) (11) of this

Permit, by the Permittee and the person conducting the audit. The report shall include, but not be limited to:

- (I) An Executive Summary of the audit performed that clearly summarizes the nature and scope of the audit, a table with all of violations noted during the audit and any corrective measures taken; Yes
  
  - (II) The report of the third-party consultant, including, without alteration, the observations, and conclusions of such consultant. Such conclusions and observations shall include, but need not be limited to, the Permittee's compliance with the requirements of this Permit, compliance with all applicable statutes and regulations regarding waste and 49 CFR Parts 171 to 180, inclusive (Hazardous Materials Regulations) and if not otherwise included, the items listed in Appendix A to Section III of this Permit; Yes
  
  - (III) A description of the audit process, including the areas of the facility inspected, a list of the records reviewed, and persons interviewed and a list or description of any other pertinent information; Yes
  
  - (IV) A description of all remedial actions taken to address each problem or violation discovered, including those corrected after the audit, but before and after submission of the audit report; and
  
  - (V) A certification that the Facility has been brought back into compliance as to any violations discovered during the audit and documentation demonstrating such compliance. If the Permittee determines that the correction of any problem or violation discovered as a result of any such audit requires more than thirty (30) days to complete, the Permittee shall include a detailed written plan for correcting such problem or violation, including, but not limited to, a schedule to complete any such action.
- (ii) Post, in a prominent location on the website for Clean Harbors, Inc., currently [www.CleanHarbors.com](http://www.CleanHarbors.com), or any successor website, the audit report submitted to the Commissioner and the completed audit checklist used to perform the audit. The Permittee shall ensure that the audit report remains posted on its website until the next audit report required by this Permit is posted on its website replacing the previous audit report. The Permittee may redact from the audit report posted on-line non-public information whose disclosure would compromise the security of the Facility, such as the location of security cameras, or would violate a confidentiality agreement between the Permittee and a third-party or information the Permittee has maintained as confidential on the grounds that disclosure could put the Permittee in a competitive disadvantage.

Should the Permittee redact any such information, no later than fifteen (15) consecutive calendar days after posting the audit report on its website, the Permittee must identify in writing to the Commissioner the information redacted and the basis for the redaction.

- (e) The Permittee shall retain in the Operating Record for the Facility each audit report and all documentation regarding the findings or results of such audit, and resolution of any identified issues/deficiencies, including the completed audit checklist used to perform the audit.
- (f) Nothing in the performance of the audit required under this Permit shall affect any authority of the Commissioner under any statute or regulation, including, but not limited to, the authority to issue any order, pursue enforcement action against the Permittee, initiate a permit modification proceeding, or prevent or abate sources of pollution or potential sources of pollution, even for matters discovered during the audit process. No audit conducted by the Permittee or the audit process pursuant to this Permit shall limit, or be construed to limit, in any way any authority of the Commissioner under any statute or regulation, including, but not limited to, any authority to inspect the Facility.

#### *Closure*

- (45) In addition to any requirements in Section IV of this Permit, the Permittee shall close the Facility in accordance with the Closure Plan presented herein as Attachment E to this Permit (The Closure Plan will require approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit). When closing or partially closing the Facility, the Permittee must demonstrate that any contaminants remaining after closure will not impact human health or environmental media including ground water, surface water, sediments, soils, or air in excess of recommended exposure limits or factors considering all potential routes of exposure. At a minimum, the closure performance standards for each hazardous waste and other constituent of concern shall meet the remediation standards regulations, RSCA 22a-133k-1 et seq. The Permittee shall notify the Department of any partial closure or closure activities of units at this Facility.

#### *Managing Decontamination Waste Generated at the Facility*

- (46) Unless this Permit provides otherwise, when decontaminating a container, roll-off container, or the waste carrying portion of a Transportation Vehicle, including a Vacuum Truck, or any other item, object or equipment, the Permittee shall comply with the provisions of Appendix B to Section III of this Permit. Yes

#### *Special Requirements for Ignitable and Reactive Waste*

- (47) In accordance with 40 CFR 264.176, the Permittee shall ensure that containers and roll-off containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the Facility's property line. The Permittee shall demarcate in any Waste Management Area, in a manner that is readily visible, any portion of any such Area that is less than 15 meters from the Facility property Boundary. Yes



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| (48) | The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste at the Facility. This waste must be separated and protected from sources of ignition or reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. | Yes |
| (49) | The Permittee shall post "No Smoking" signs in conspicuous locations where ignitable or reactive waste can be managed or stored at the Facility and confine smoking and open flames to specially designated locations.  | Yes |
| (50) | The Permittee shall ground/bond any container, including, but not limited to, a Transportation Vehicle, of ignitable waste or other materials stored or managed in the Facility, at least during the addition and removal of waste to and from any such container.  | Yes |

*Multiple Hazardous Waste Codes*

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| (51) | If a hazardous waste is brought to the Facility and the manifest for such waste contains multiple EPA hazardous waste codes, the Permittee shall comply with all applicable requirements, including, but not limited to, the requirements of this Permit, for such waste codes. | Yes |
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*Land Disposal Restrictions*

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| (52) | The Permittee shall comply with the land disposal restrictions in 40 CFR Part 268. As part of such compliance, the Permittee shall not mix hazardous waste that does not meet the applicable treatment standard in 40 CFR Part 268, subpart D, with debris that changes the treatment classification of such waste (i.e., from waste to hazardous debris). | Yes |
| (53) | Dilution Prohibition. The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 40 CFR Part 268.  | Yes |
| (54) | Notifications. The Permittee shall maintain notifications from generators that are required by 40 CFR 268.7 to accompany an incoming shipment of hazardous waste subject to 40 CFR 268, Subpart C, that specify treatment standards, as required by 40 CFR 264.73 and 268.7 of this Permit.  | Yes |
| (55) | Waste Analysis for Land Disposal Restrictions.   |     |
| (a)  | The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.  | Yes |
| (b)  | For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.                | Yes |

- (c) If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 40 CFR Part 268. Yes

**(B) SPECIFIC CONDITIONS APPLICABLE TO CONTAINERS, INCLUDING ROLL-OFF CONTAINERS AND TRANSPORTATION VEHICLES.**

In addition to any other requirements of this Permit, the Permittee shall comply with the following requirements regarding containers, including roll-off containers and Transportation Vehicles, in the Container Storage Areas (including Container Storage Area C in the Bulk Unloading and Loading Area), the Areas to Stage Containers, the Mix-Tub, Bulk Storage and Transfer Area and the Bulk Unloading and Loading Area.

- (1) At all times, the Permittee shall maintain aisle space, at a minimum, of 24 inches, between a row or pallet of containers to allow for inspection container handling and the unobstructed movement of personnel and equipment used for emergency response, including, but not limited to, fire protection, spill control and decontamination and staging operations. Yes
- (2) The stacking of containers (up to 55 gallons) in the Container Storage Areas shall be limited to two (2) tiers high. 350-gallon tote containers may be double stacked. If the Permittee stacks 350-gallon totes, safeguards must be in place to inspect their condition and labeling information at all times. The Permittee shall ensure that containers **are not stacked at any time in:** Yes
- (i) Any of the Area H Areas to Stage Containers, other than containers with a capacity of five (5) gallon or less, which shall not be stacked more than two (2) tiers high; or Yes
- (ii) The Mix-Tub, Bulk Storage and Transfer Area. Yes
- (3) The Permittee shall ensure that each container with hazardous waste, including a roll-off container and Transportation Vehicle, is labeled or marked clearly with the words "Hazardous Waste" and other words that identify the contents of each container, such as "flammable," "acid", "alkaline", "cyanide", "reactive," "halogenated solvent," "latex paint," "oil paint" or the chemical name of the contents of the container. Yes
- (4) (a) The Permittee shall not store any wastes or other materials that are incompatible within an Area to Stage Containers, a Container Storage Area, the Mix-Tub, Bulk Storage and Transfer Area or the Bulk Unloading and Loading Area. Yes
- (b) Within the Container Storage Area building, the Permittee shall not store hazardous wastes or other materials that are incompatible, unless such wastes are protected or separated from each other by means of dike, berm, wall, tank, or other device. Yes

For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264, Appendix V.

- (5) (a) At the time any container of waste or other material, including a roll-off container or Transportation Vehicle, is placed into any Container Storage Area or Area to Stage Containers, the Mix-Tub, Bulk Storage and Transfer Area or the Bulk Unloading and Loading Area, the Permittee's trained personnel shall ensure that:
- (i) The container is not deteriorated (e.g., cracked, rusted), damaged or leaking; Yes
  - (ii) The container is tightly closed; No
  - (iii) Any applicable requirements of the WAP, presented herein as Attachment A to this Permit (The WAP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit), have been complied with and recorded in the Operating Record for the Facility. Yes
  - (iv) The information on the Waste Analysis Profile Sheet for such container is consistent with the information on the label on the container, such that the waste or other material is in the appropriate container; and Yes
  - (v) A bar code, or similar tracking device, has been placed on the container such that at all times the Permittee can identify: Yes
    - (I) The contents of the container; Yes
    - (II) When a container was placed in a such area; and Yes
    - (III) All of the containers placed in any such area. Yes
- (b) If inspection reveals that any of the conditions specified in Section III (B) (5) (a) of this Permit are not met, the Permittee shall correct the condition immediately. If an immediate correction is not possible, the Permittee shall segregate and isolate such waste or other material by placing it, by itself, in a separate Staging Area H on a containment pallet or a separate distinct part of the Mix-Tub, Bulk Storage and Transfer Area or Bulk Unloading and Loading Area for a roll-off container or Transportation Vehicle. The Permittee shall not place any other waste or other material in any such area until the Permittee is in compliance with all of the conditions in Section III (B) (5) (a) of this Permit. In the event waste or other material is segregated and isolated pursuant to this provision of the Permit, the Permittee shall record in the Operating Record for the Facility the date and area into which waste or other material was placed, the reason for placing such waste or other material in that area, any corrective or other action taken regarding such waste or other material and the date any such waste or other materials was removed from such area. In the event that the Permittee cannot comply with Section III (B) (5) (a) of this Permit, the Permittee shall comply with Section III (A) (38) (b) for any such waste or other material. No
- (6) In addition to any other requirements of this Permit, the Permittee shall ensure that:

- (a) Once a container leaves a Container Storage Area or an Area to Stage Containers and is brought into the Truck-to-Truck Transfer Area that any such container is sent off-site and is not returned to any Container Storage Area or Area to Stage Containers; and Yes
- (b) Once a Transportation Vehicle leaves the Mix-Tub, Bulk Storage and Transfer Area or the Bulk Unloading and Loading Area, such vehicle shall not be brought to the Truck Parking Area or the Truck-to-Truck Transfer Area or Truck-to-Truck Parking Area. Yes

**(C) REQUIREMENTS REGARDING PAINTCARE PROGRAM WASTE**

In addition to any other requirements of this Permit, the Permittee shall comply with the following requirements regarding all PaintCare Program Waste brought to the Facility.

- (1) PaintCare Program Waste shall be received at the Facility in containers that are in direct contact with waste, (e.g. paint cans) Inner Containers, that are within a larger container, an Outer Container, used to hold the Inner Containers. Upon arrival at the Facility, but before a Transportation Vehicle enters any Waste Management Area, the Permittee shall record the date that each Outer Container arrives at the Facility and shall maintain a record of the date in the Operating Record for the Facility. Yes
- (2) The Permittee shall ensure that PaintCare Program Waste is off-loaded from a Transportation Vehicle onto the Loading Dock in the Truck-to-Truck Transfer Area. Yes
- (3) After being off-loaded onto the Loading Dock, the Permittee shall visually inspect both the Inner and Outer Containers:
  - (a) If an inspection reveals that the integrity of an Outer Container has been compromised, the Permittee shall transfer all of the Inner Containers to an Outer Container whose integrity is not compromised; and Yes
  - (b) If an inspection reveals that an Inner Container is or may be leaking, the Permittee shall immediately take all measures necessary to prevent leakage, or further leakage. If the integrity of an Inner Container has been compromised, the Permittee shall place the compromised container in salvage container or transfer the waste from the leaking container to a container whose integrity has not been compromised and, if necessary, transfer all of the other non-leaking Inner Containers to another Outer Container whose integrity has not been compromised. If a new Outer Container is used, the Permittee shall label the new Outer Container with the information taken from the Outer Container from which the Inner Containers were removed. Yes
  - (c) The Permittee shall properly characterize and manage any waste generated as a result of a leak, spill or release from an Inner or Outer Container in accordance with all applicable requirements. Yes
- (4) The Permittee shall ensure that all PaintCare Program Waste leaving the Loading Dock is brought only to:

- (a) Staging Areas H for staging only; the Permittee shall not sort, or otherwise manage, such waste in Staging Areas H; or  
Yes  
Yes
- (b) Staging Area M-2 for sorting, and if necessary, sampling pursuant to Section III(C) (6) (b) of this Permit.
- (5) (a) In Area M-2, the Permittee shall sort all of the Inner Containers into Waste Paint and Non-Paint Waste. The Permittee shall further sort all Waste Paint into Latex Waste Paint and Non-Latex Waste Paint. The Permittee shall place all of the sorted Inner Containers brought to Staging Area M-2 into a different Outer Container used solely for Latex Waste Paint, Non-Latex Paint Waste or Non-Paint Wastes. The Permittee shall ensure that during the sorting process all of the Inner Containers are sorted correctly and placed in the correct Outer Container (i.e., Latex Waste Paint is placed in an Outer Container only for such waste). Once sorted the Permittee shall not co-mingle or mix in a container Latex Waste Paint, Non-Latex Paint Waste or Non-Paint Wastes, except that if the Permittee determines, pursuant to Section III(C)(6) of this Permit that Non-Paint Wastes can be managed with Non-Latex Paint wastes, the two wastes can be co-mingled in the same Outer Container.  
Yes
- (b) Nothing in the foregoing shall prevent the Permittee from managing all of the waste in an Outer Container as either Latex Waste Paint, Non-Latex Waste Paint or Non-Paint Waste, provided the Permittee retains in the Operating Record for the Facility the basis upon which it determined that all of the Inner Containers in any such Outer Container were of one waste type.  
Yes
- (c) When sorting PaintCare Program Waste the Permittee may rely on the label of an Inner Container, unless the Permittee has reason to believe that the label is not accurate (i.e., the waste is not as specified on the label).  
Yes
- (6) When sorting PaintCare Program Waste if the Permittee finds Non-Paint Waste:
- (a) The Permittee shall identify the waste and determine if it can be managed at its Facility, and if so, how it must be managed. In complying with this provision, the Permittee cannot rely on the household waste exclusion in 40 CFR 261.4(b);  
Yes
- (b) In identifying Non-Paint Waste, the Permittee may rely on the label of the container for such waste provided the Permittee has no reason to believe that the waste is not as specified on the label. If there is no label on the container or the Permittee has reason to believe that the waste is not as specified on the label, the Permittee shall:
- (i) immediately place such waste in an Area H used for Staging Containers on a containment pallet and perform laboratory analysis to identify such waste. The Permittee shall not place any other waste in such staging area until the waste, after analysis, has been identified and the Permittee based upon such analysis has determined how such waste shall be managed; and  
Yes

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| (ii) | record in the Operating Record for the Facility the Staging Area where such waste has been placed, the results from the waste analysis for such waste and how such waste was managed at the Facility.  | Yes |
| (c)  | If the Permittee determines that Non-Paint Waste can be managed at its Facility, the Permittee may manage such waste and shall do so in compliance with all of the requirements of this Permit.  | Yes |
| (d)  | If the Permittee determines that Non-Paint Waste cannot be managed at the Facility, the Permittee shall comply with the requirements of Section III (A) (38) of this Permit regarding such waste.  | Yes |
| (7)  | Before using a new Outer Container for sorted waste, the Permittee shall first place a label on the container that:  |     |
| (a)  | Indicates whether the Outer Container is being used for Latex Waste Paint or Non-Latex Waste Paint;  | Yes |
| (b)  | Remains legible to emergency personnel; and  | Yes |
| (c)  | Indicates the date that an Inner Container was first placed in such Outer Container.   | No  |
|      | The Permittee shall not remove or modify the label once it is placed on an Outer Container as long as Latex Waste Paint or Non-Latex Waste Paint remains in the container, even when the Outer Container is moved from Staging Area M-2 to a Container Storage Area at the Facility. Additionally, the Permittee shall not place any Inner Container into an Outer Container that is not labeled in accordance with this provision of the Permit.  | Yes |
| (8)  | Once an Inner Container with Latex Waste Paint or Non-Latex Waste Paint has been sorted and placed in an Outer Container, the Permittee shall not remove any such Inner Container and place it into another Outer Container, unless the Outer Container into which such Inner Container is being moved is labeled with a date that is earlier than the date on the Outer Container from which the Inner Container was removed. Notwithstanding the foregoing, if the Integrity of an Outer Container has been compromised and needs replacing, the Permittee shall label the new Outer Container with the information taken from the Outer Container whose integrity has been compromised. | Yes |
| (9)  | Unless Section III(C)(6)(d) applies, the Permittee shall ensure that no later than five (5) days after PaintCare Program Waste has been brought to Area M-2 that:  |     |
| (a)  | all of the requirements of Section III(C)(5)-(8) of this Permit have been completed; and   | Yes |
| (b)  | that all such waste is removed from Area M-2 and brought to the Container Storage Area for storage or to the Truck-to-Truck Transfer Area for off-site shipment.   | Yes |

- (10) The Permittee shall ensure that no Latex Waste Paint or Non-Latex Waste Paint remains at the Facility more than one year. The date recorded on an Outer Container shall be used when determining compliance with this provision, regardless of when any Inner Container was placed in such Outer Container. Yes
- (11) The Permittee shall manage all Non-Latex Waste Paint as a hazardous waste, at a minimum for ignitability, unless based upon the results of a hazardous waste determination using the method specified in 40 CFR 262.11, the Permittee determines that the waste is not a hazardous waste. The Permittee shall retain the results of any such hazardous waste determination in the Operating Record for the Facility. Yes
- (12) During the entire time that PaintCare Program Waste is at the Facility, the Permittee shall ensure that all such waste is away from and protected against ignition sources. Yes
- (13) The Permittee shall maintain all PaintCare Program Waste containers, upright and in a manner that will protect them from breakage, rupture, and conditions that may cause them to leak. The Permittee shall keep all Inner Containers closed at all times, except if a container not in good condition (e.g., there is severe rusting, cracks, apparent structural defects or bulging) or if it begins to leak, the Permittee shall immediately take all measures necessary to prevent leakage, or further leakage. If the integrity of an Inner Container has been compromised, the Permittee shall place the compromised container in salvage container or transfer the waste from the compromised container to a container whose integrity has not been compromised, and, if necessary, transfer all of the other non-leaking Inner Containers to another Outer Container whose integrity has not been compromised. If a new Outer Container is used, the Permittee shall label the new Outer Container with the information taken from the Outer Container from which the Inner containers were removed. The Permittee shall properly characterize and manage any waste generated as a result of a leak, spill, or release from an Inner or Outer Container in accordance with all applicable requirements. Yes

**(D) SPECIFIC WASTE MANAGEMENT AREA OPERATING CONDITIONS.**

The Permittee shall comply with the following conditions specific to the Waste Management Areas specified below.

**(1) CONTAINER STORAGE AREAS AND AREAS TO STAGE CONTAINERS:**

- (a) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements at each Container Storage Area (“**CSA**”) and each Area to Stage Containers (“**ASC**”). The Permittee shall ensure that:
- (i) All containers holding wastes or other materials are handled or stored in a manner that prevents leakage or spillage from such containers; Yes
- (ii) All containers holding waste or other materials remain closed except: Yes

- (I) During the time necessary to sample waste or other materials;
  - (II) When lab pack wastes are being consolidated or poured into the On-Site Wastewater Treatment Plant;
  - (III) When a container is not in good condition and the contents are being transferred, as provided for in Section III (A) (12) of this Permit; or
  - (IV) When, in staging Areas H only, waste, or other materials is being pumped to the On-Site Wastewater Treatment Plant or Tanks Systems 11 or 14;
- (iii) If not provided for in the Inspection Plan presented herein as Attachment B to this Permit (The IP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit), whenever waste or other materials is present in any CSA or ASC, the Permittee visually inspects such Areas daily for the items identified in Section III (A) (20) of this Permit and shall take action and record such inspections as provided for in in Section III (A) (20) and (21) of this Permit; Yes
- (iv) Each container storage area and each staging area has a secondary containment system that at a minimum complies with the requirements of 40 CFR 264.175; No
- (v) The Permittee complies with all applicable requirements of 40 CFR 264, Subpart CC regarding hazardous waste in containers. The Permittee shall maintain in the Operating Record for the Facility all records needed to demonstrate compliance with the applicable requirements of 40 CFR 264, Subpart CC; and Yes
- (vi) When waste or other materials is brought to or placed in in any ASC, a drum cart or a forklift truck is in the immediate vicinity of such Area to allow for quick transfer or movement of containers in the event of an emergency. Yes
- (b) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements at each Container Storage Area, including Container Storage Area C in the Bulk Unloading and Loading Area:
- (i) The Permittee shall post in each Container Storage Area, a sign, or signs, clearly identifying the type of waste or other material being stored (e.g., corrosivity, flammability, oxidizer, poison, toxic etc.) in such Area or portion of such area. The Permittee shall ensure that the sign(s) in each Container Storage Area, or portion of such area, is secure, legible, and clearly visible from a distance of at least twenty-five (25) feet. Any such sign shall remain posted as long as waste or other material of the type designated on the sign is stored in such area; No



- (ii) The Permittee may change the type of waste or other material stored in Container Storage Areas B, D, E, F, G, J, K and L, provided that before changing the type of waste or other material in any such Area the Permittee shall:
- No
- (I) Remove all waste and other material from the Area;
  - (II) Inspect the Area for the presence of visible residue and compliance with Section III (A) (29) of this Permit;
  - (III) Comply with Sections III (A) (30) (b) to (d), inclusive and III (A) (31) and III (A) (32) of this Permit regarding such Area, as necessary;
  - (IV) Post a new sign or signs that complies with Section III (D)(1)(b)(i) of this Permit for the Area, if necessary; and
  - (V) Record the following information in the Operating Record for the Facility:
    - (A) The name and title of the person inspecting the Area after the removal of all waste and other materials;
    - (B) The date and results of the inspection of the Area, and any action taken as a result of the inspection;
    - (C) The name and title of the person, who, after inspection, determined that the Area can be re-designated and used for a different type of waste or other material and the date of this inspection; and
    - (D) The change in type of waste stored in the Area, including the previous and new waste.
- (iii) The Permittee shall ensure no reactions of a type specified in 40 CFR 246.17(b)(1)-(5) occur whenever the Permittee is changing the type of waste or other materials stored in a Container Storage Area. This includes, but is not limited to, changes involving waste or other materials that are incompatible, as determined in accordance with 40 CFR 264, Appendix V.
- (iv) Except for hazardous waste specified in 40 CFR Part 268.50(d) and (e), the Permittee may store hazardous waste restricted from land disposal, provided:
- (I) the Permittee clearly marks each container of waste to identify the contents of such container and the date such container was first placed into storage at a Container Storage Area at the Facility;
  - (II) such waste is not stored for longer than one (1) year or
- NoY

- (III) three hundred sixty-five (365) calendar days from the date such waste was first placed in storage at the Facility; and the Permittee can demonstrate that such storage is solely for the purpose of accumulating such quantities necessary for recovery, treatment, or disposal of such waste. Yes
- (c) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements at Area M2 in connection with PaintCare Program Waste:
- (i) The Permittee shall ensure that Area M2 is equipped with appropriate emergency response equipment including, but not limited to, a fire extinguisher, a salvage drum, eye wash, safety shower, and a spill kit containing, at a minimum, safety goggles, gloves, absorbent, and personnel protective equipment; and Yes
- (ii) In addition to all hazardous waste training, the Permittee shall ensure that all Facility personnel handling PaintCare Program Waste are trained in all of the requirements of this Permit, for such waste including, but not limited to, handling, inspecting, tracking, reporting and sorting and in the emergency response procedures and Facility standard Operating Procedures. The Permittee shall maintain training plans and records of the training provided to comply with this provision in the Operating Record for the Facility. Yes
- (d) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements in the Area to Stage Containers regarding the consolidation of lab packs with waste or other materials.
- (i) The Permittee shall not accept a lab pack for disassembly that:
- (I) Has not been pre-approved in accordance with the Facility's WAP incorporated as Attachment A to this Permit (The WAP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit); and Yes
- (II) Is not accompanied by a packing slip denoting the chemical contents, waste codes and the type and sizes of individual containers within the lab pack. Yes
- (ii) The Permittee may only consolidate lab packs in the designated Areas.
- (iii) When disassembling a lab pack the Permittee shall assess:
- (I) The physical condition of each container inside the lab pack to determine whether the integrity of any container inside the lab pack has been compromised. If the integrity of any such container has been compromised, the Permittee shall determine whether pour-off activities can safely be conducted or whether the lab pack container Yes

requires further disassembly or repackaging. The Permittee shall manage all waste generated from a container whose integrity of has been comprised, in accordance with all applicable requirements; and

- (II) Whether the containers within the lab-pack match the containers listed on the packing list for lab pack. If a discrepancy is discovered (e.g., container not listed on the packing list is discovered), the Permittee shall comply with Section III (A) (37) of this Permit regarding any such container. Yes
- (iv) The Permittee may consolidate the waste or other materials in one lab pack with waste or other materials in another lab pack or take the waste or other materials in two or more lab packs and consolidate them in a new lab pack container, provided that:
  - (I) The Permittee does not open any containers within a lab pack during the consolidation process; Yes
  - (II) The Permittee ensures that the contents of all lab packs being consolidated are compatible, as determined by 40 CFR Part 264, Appendix V; and Yes
  - (III) The Permittee disposes of all waste generated from the consolidation of lab packs in accordance with all applicable requirements. Yes

**(2) BULK UNLOADING AND LOADING AREA (BULA)**

- (a) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding the Bulk Unloading and Loading Area (BULA). The Permittee shall ensure that:
  - (i) No incompatible waste or other materials are in the Bulk Unloading and Loading Area at the same time. This includes, but is not limited to, waste or other materials on Transportation Vehicles or in a container. For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264 Appendix V; Yes
  - (ii) When decontaminating Transportation Vehicles, or any portion thereof of any equipment used in connection with the transfer of waste or other materials, the Permittee complies with Appendix B to Section III of this Permit; Yes
  - (iii) In addition to any other secondary containment requirements, the secondary containment system in the Bulk Unloading and Loading Area complies with the requirements of 40 CFR 264.175; and No
  - (iv) Prior to transferring any waste or other materials from the Bulk Unloading and Loading Area:

- |            |   |     |
|------------|---|-----|
| (I)        | All applicable sections of the Waste Analysis Plan, incorporated herein as Attachment A to this Permit have been complied with;   | Yes |
| (II)       | The receiving tank, including a tank associated with the On-Site Wastewater Treatment Plant, Transportation Vehicle or container has the capacity to receive the waste or other material to be transferred;   | Yes |
| (III)      | All waste or other materials being transferred from the Bulk Unloading and Loading Area is compatible with waste or other materials in the On-Site Wastewater Treatment Plant, Tank Systems 11 or 14 or in the receiving Transportation Vehicle or container. For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264 Appendix V; and  | Yes |
| (IV)       | That the name of the person who authorized such transfer and the amount of waste or other materials being transferred is recorded and maintained in the Operating Record for the Facility.  | Yes |
| (v)        | A sign is posted, or signs are posted, clearly identifying the type of waste or other material (e.g., corrosivity, reactive, ignitable, flammability, oxidizer, poison, toxic, etc.) in the Bulk Unloading and Loading Area or portion of such area. The Permittee shall ensure that all such signs are secure, legible, and clearly visible from a distance of at least twenty-five (25) feet and remain posted as long as waste or other material of the type designated on the sign is in such area; | No  |
| <b>(3)</b> | <b>TANK SYSTEMS 11 AND 14.</b> The Permittee is prohibited to store wastes with Volatile Organic concentrations greater than 500 parts per million by weight (ppmw) by weight in Tank Systems 11 and 14.  |     |
| (a)        | In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding Tank Systems 11 and 14.  |     |
| (i)        | The Permittee shall not place any waste in Tank Systems 11 and 14 that could cause any tank, its ancillary equipment, or containment system to rupture, leak, corrode or otherwise fail.  | Yes |
| (ii)       | The Permittee shall prevent spills and overflows from Tank Systems 11 and 14 or any containment system associated with these tanks systems. At a minimum, the Permittee shall use the following measures to prevent spills:   | Yes |
| (I)        | Spill prevention controls (e.g., check valves, dry disconnect couplings); and   |     |
| (II)       | Overfill prevention controls such as high-level alarms or automatic feed cutoffs.   | Yes |

- (iii) The Permittee shall retain in the Operating Record for the Facility, documentation demonstrating compliance with 40 CFR 264.191 and 40 CFR 264.192. This documentation shall include the certification statement required by 40 CFR 270.11(d). Yes
  
- (iv) The Permittee shall ensure that all ancillary equipment associated with Tank Systems 11 and 14 is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, or contraction. Yes
  
- (v) The Permittee shall comply with the requirements of 40 CFR 264.196, with respect to leaks or spills or unfit-for-use tank system(s). Yes
  
- (vi) Prior to transferring any waste into Tank Systems 11 or 14, the Permittee shall:
  - (I) Ensure compliance with all applicable sections of the WAP, incorporated herein as Attachment A to this Permit (The WAP needs written approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit); Yes
  
  - (II) Ensure that wastes with VO concentration greater than 500 ppmw **are not accepted** for storage in the Tank Systems. The Permittee shall conduct a sampling verification of the waste prior to any transfer; Yes
  
  - (III) Ensure that Tank Systems 11 or 14 have the capacity to receive the waste to be transferred; and Yes
  
  - (IV) Record and maintain in the Operating Record for the Facility the name of the person who authorized such transfer and the amount of waste being transferred. Yes
  
- (vii) The Permittee shall comply with all applicable requirements including, but not limited to the requirements of this Permit, regarding the wastes in Tank System 11 and 14. Such compliance shall include, but not be limited to, compliance with the requirements applicable to each waste that may be added to a tank system and any resultant mixture (i.e. any resultant mixture shall be managed as containing each waste added to such mixture). The Permittee shall maintain in the Operating Record for the Facility all documentation used to demonstrate such compliance, including, but not limited to, records regarding the waste analysis requirements in 40 CFR 262.11 and the land disposal restrictions in 40 CFR Part 268. Yes

*Decontamination*

- (viii) The Permittee shall decontaminate Tank System 11 or 14, as applicable, in accordance with Appendix B of this Section of the

Permit, whenever:

- (I) PCBs, at any level, are detected in a tank system or in any waste or other materials in, or added to, a tank system; or Yes
- (II) All of the waste has been removed from a tank system, and
  - (A) the waste removed and the waste to be added to such tank system thereafter are incompatible, as determined in accordance with 40 CFR Part 264, Appendix V; or Yes
  - (B) the waste removed contains a listed hazardous waste and the waste to be added to such tank system thereafter is a non-hazardous waste or is a characteristic hazardous waste.
- (ix) The Permittee shall comply with Appendix B to Section III of this Permit when decontaminating a tank system and in addition to such requirements, the Permittee shall keep and maintain in the Operating Record for the Facility a Tank Cleaning Certificate or equivalent documentation regarding decontamination of such tank system. An example of a Tank Cleaning Certificate is presented in Appendix C to Section III of this Permit;

### *Secondary Containment*

- (x) In addition to any other requirements of this Permit, the Permittee shall comply with 40 CFR 264.193 for Tank Systems 11 and 14. For purposes of determining compliance with this provision:
  - (I) a number of tanks and ancillary equipment that are part of or are associated with the On-Site Wastewater Treatment Plant are located in the area that provides secondary containment for Tank Systems 11 and 14. All such tanks and equipment, including, but not limited to, the volume of such tanks and equipment, shall be considered; and Yes
  - (II) any device or structure creating negative containment volume (e.g., equipment or tanks that are part of or are associated with the On-Site Wastewater Treatment Plant) shall be included. Yes

### *Inspections*

- (xi) If not provided in the Inspection Plan incorporated herein as Attachment B to this Permit (The Inspection Plan needs review and written approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit), the Permittee shall ensure that inspections of Tank Systems 11 and 14 include a daily evaluation of: Yes

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|-------|---|-----|
| (I)   | The overflow controls (high level alarms, automatic waste feed cut-off, and all other overflow/spill control equipment associated with each tank system) to ensure that such controls are in good working order;  | Yes |
| (II)  | The above ground portions of the tank system to identify corrosion, leaks, deterioration or structural fatigue in any portion of the tank or system components (all piping, including flanges, joints, valves, and other connections, flow metering devices associated with each tank system) to ensure that it is in good working order; | Yes |
| (III) | The area immediately surrounding the externally accessible portion of each tank system, including the secondary containment system (e.g., dikes) to identify signs of leaks (e.g., wet spots) or spills; and  | Yes |
| (IV)  | Analysis of any data received from leak detection monitors or alarms.   | Yes |

*Incompatibles*

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|-------|--|----|
| (xii) | The Permittee shall not place incompatible wastes, in the same tank system, unless before doing so the Permittee performs a bench scale test that demonstrates that mixing incompatible wastes will not result in any of the reactions specified in 40 CFR 264.17(b). Should the Permittee mix incompatibles in the same tank system it shall maintain separately in the Operating Record for the Facility documentation that clearly identifies the incompatible wastes that were mixed, the bench scale tests performed on mixing such wastes and the results of such tests. | No |
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For purposes of this provision, the compatibility shall be determined in accordance with 40 CFR Part 264, Appendix V.

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|--------|---|----|
| (xiii) | Tank Systems 11 and 14 are located in a vault system that also contains numerous tanks and ancillary equipment that are part of or are associated with the On-Site Wastewater Treatment Plant. The Permittee shall ensure that at all times, all wastes placed in Tank Systems 11 and 14 remain separated from any incompatible waste in the same vault system, including the contents of tanks or equipment that are part of or are associated with the On-Site Wastewater Treatment Plant, or are protected from such incompatibles by means of dike, berm, wall, double-walled tank or other device. | No |
|--------|---|----|

For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264, Appendix V.

*Labeling/Recordkeeping*

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|-------|--|-----|
| (xiv) | The Permittee shall ensure that any tank (11 or 14) into which hazardous waste is labeled or marked clearly on the outside of such tank with the words " <b>Hazardous Waste</b> ," and other words | Yes |
|-------|--|-----|

that identify the contents of the tank, such as “flammable,” etc. The Permittee shall ensure that any such label or marking is secure, legible, and clearly visible from a distance of at least twenty-five (25) feet and remains posted as long as hazardous waste is stored in such tank system.

- (xv) The Permittee shall ensure that any tank (11 or 14) into which non-hazardous waste is labeled or marked clearly on the outside of such tank, with words “**Non-RCRA Wastes**” and other words that identify the contents of such tank such as “non-flammable.” The Permittee shall ensure that any such label or marking is secure, legible, and clearly visible from a distance of at least twenty-five (25) feet and remains posted as long as non-hazardous waste is stored in such tank system. No
- (xvi) The Permittee shall place a label or mark on the outside of tank 11 and 14 clearly indicating the capacity of each tank system. The Permittee shall ensure that any such label or marking is secure, legible, and clearly visible from a distance of at least twenty-five (25) feet. Yes
- (xvii) The Permittee shall maintain in the Operating Record for the Facility the quantity of waste added to a tank system and the date and time, that such quantity was added to such tank system. Yes

*Land Disposal Restriction Requirements*

- (xviii) Except for hazardous waste specified in 40 CFR Part 268.50(d) and (e), the Permittee may store hazardous waste restricted from land disposal provided:
  - (I) the Permittee records and maintains in the Operating Record for the Facility, the date such waste was put into Tank 11 or 14; Yes
  - (II) such waste is not stored for longer than one (1) year or three hundred sixty-five (365) calendar days from the date such waste was put into Tank 11 or 14; and Yes
  - (III) the Permittee can demonstrate that such storage is solely for the purpose of accumulating such quantities necessary for recovery, treatment, or disposal of such waste. Yes

**(4) MIX-TUB, BULK STORAGE AND TRANSFER AREA (MBSTA)**

- (a) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements in the Mix-Tub, Bulk Storage and Transfer Area.
  - (i) The Permittee shall ensure that the secondary containment system in the Mix-Tub, Bulk Storage and Transfer Area complies with the requirements of 40 CFR 264.175. No



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|---|------------|---|
| <ul style="list-style-type: none"> <li>(ii) Weather permitting, the Permittee shall power wash or clean the Mix-Tub, Bulk Storage and Transfer Area monthly. The Permittee shall perform a hazardous waste determination on the rinsate and shall manage such rinsate in accordance with all applicable requirements.</li> </ul>  | <p>Yes</p> |   |
| <ul style="list-style-type: none"> <li>(b) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding the storage of waste or other materials in roll-off containers, Transportation Vehicles, including Vacuum Trucks, within the Mix-Tub, Bulk Storage and Transfer Area:           <ul style="list-style-type: none"> <li>(i) Prior to placing any waste or other materials in the Mix-Tub, Bulk Storage and Transfer Area, the Permittee shall:               <ul style="list-style-type: none"> <li>(I) Post a sign or signs, clearly identifying the type of waste or other material (e.g., corrosivity, flammability, oxidizer, poison, toxic, etc.) in such Area or portion of such area. The Permittee shall ensure that any such sign(s) is secure, legible, and clearly visible from a distance of at least twenty-five (25) feet. Any such sign shall remain posted as long as waste or other material of the type designated on the sign is in the Mix-Tub, Bulk, Storage and Transfer Area;</li> <li>(II) Visually inspect such roll-off container, Truck or Vehicle and shall not place or store such container in the Mix-Tub, Bulk Storage and Transfer Area unless the container, Truck or Vehicle:                   <ul style="list-style-type: none"> <li>(a) Is properly marked and labeled;</li> <li>(b) Is in good condition and free of impairment or damage;</li> </ul> </li> <li>(III) Ensure that the required profile form and manifest or shipping paper has been received at the Facility and all applicable sections of the WAP, incorporated herein as Attachment A (The WAP needs review and written approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit) to this Permit have been complied with; and</li> <li>(IV) Is covered in a manner that meets the requirements of Section III (D) (4) (b) (ii) of this Permit;</li> </ul> </li> <li>(ii) The Permittee shall ensure that at all times, except when waste is being removed from or placed in a roll-off container, Transportation Vehicle, including a Vacuum Truck, that each roll-off container or vehicle has a seal or cover:               <ul style="list-style-type: none"> <li>(I) Capable of preventing fugitive emissions;</li> <li>(II) Capable of preventing precipitation from entering the</li> </ul> </li> </ul> </li> </ul> |            | <p>No</p> <p>Yes</p> <p>No</p> <p>Yes</p> <p>No</p> <p>No</p> <p>No</p> |

- container or that portion of the Vehicle or Truck holding waste; and
- (III) Of sufficient strength to prevent any tears during handling operations; and
- (iii) If a roll-off container or Transportation Vehicle, including a Vacuum Truck, holding waste does end up containing free draining liquids as a result of precipitation, the Permittee shall remove such liquid within twenty-four (24) hours from the time of discovery or the time the Permittee should have discovered such accumulated precipitation; Yes
- (iv) Except for hazardous waste specified in 40 CFR Part 268.50(d) and (e), the Permittee may store hazardous waste restricted from land disposal in the Mix-Tub, Bulk Storage and Transfer Area provided such storage is solely for the purpose of accumulating such quantities necessary for recovery, treatment or disposal of such waste; and
- (v) The Permittee shall ensure that no Vacuum Truck in the Mix-Tub, Bulk Storage and Transfer Area containing liquids, semi- solids or solids, has a capacity that exceeds 4,000 gallons, except a Vacuum Truck that was in the Bulk Unloading and Loading Area and after it has transferred all of its liquid contents into the Facility from the Bulk Unloading and Loading Area is brought to the Mix-Tub, Bulk Storage and Transfer Area for the sole purpose of cleaning out the inside of such truck. Yes
- (c) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding the Mix-Tub in the Mix-Tub, Bulk Storage and Transfer Area.
- (i) The Permittee shall not place any waste in the Mix-Tub except when stabilizing, solidifying, or bulking such waste or when collecting rinsate from decontamination activities. Yes
- (ii) The Permittee shall have in place a Sampling Protocol Procedure to prevent treating wastes with a VO concentration above 500 ppmw in the Mix-Tub. The Permittee is prohibited from treating wastes with VO concentrations above 500 ppmw. Such a documentation shall be maintained in the Operating Record for the Facility. Yes
- (iii) The Permittee shall ensure that if a container brought to the Mix-Tub Drum Process Area identified on Drawing No. 62WC-7100-204, Waste Management Areas, Site Plan, or a Vacuum Truck brought to the Mix-Tub, Bulk Storage and Transfer Area contains liquids or a mixture of solids, semi-solids and liquids, that:
- (I) The Permittee is authorized to receive the liquid portion of such waste at the On-Site Wastewater Treatment Plant, Tank 11 or 14 or in containers, excluding roll-off Yes

containers;

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| (II)  | The liquid portion of any such waste is removed from such container or Vacuum Truck before such waste is placed into the Mix-Tub; and  | Yes |
| (III) | Such liquid is pumped to the On-Site Wastewater Treatment Plant, to Tank 11 or 14 or to a container, excluding roll-off containers.  | Yes |
| (iv)  | The Permittee shall ensure that if a Transportation Vehicle, other than a Vacuum Truck, is brought to the MBSTA with waste to be bulked in the Mix-Tub, that any liquids in such waste are removed from such waste in the BULA, before the waste is emptied into the Mix-Tub.  | Yes |
|       | For purposes of this provision, the term liquids shall not include liquids that may have settled during transportation, provided that liquids that have settled during transportation shall be limited to liquids present in a separate distinct phase that do not occupy more than one inch in a container, Transportation Vehicle, including a Vacuum Truck. |     |
| (v)   | Prior to solidifying or bulking any wastes or stabilizing any hazardous waste the Permittee shall:   |     |
|       | (I) Ensure compliance with all applicable sections of the Waste Analysis Plan, including, but not limited to, any compatibility assessment, incorporated herein in Attachment A to this Permit; and  | Yes |
|       | (II) Record and maintain in the Operating Record for the Facility the name of the person who authorized such solidification, stabilization, or bulking.  | Yes |
| (vi)  | (I) The Permittee shall not place incompatibles wastes into the Mix-Tub for any purpose and shall ensure that any substance added to solidify or stabilize a waste is compatible with such waste.  | Yes |
|       | (II) The Permittee shall ensure that any residue present in the Mix-Tub is compatible with any waste added to the Mix-Tub or any substance added to solidify or stabilize a waste.   | Yes |
|       | For purposes of Section III (4) (D) (iv) of this Permit, compatibility shall be determined in accordance with 40 CFR Part 264, Appendix V.   |     |
| (vii) | The Permittee shall inspect the Mix-tub for signs of spills and leaks before, during and after each use. The Permittee shall ensure that:  | Yes |

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|        | (I)   | Any spills or leaks detected during inspection are immediately and properly remediated;   | Yes |
|        | (II)  | As a result of such inspection, any necessary repairs are made as soon as possible; and   | Yes |
|        | (III) | Such inspections and any action taken as a result of such inspections are recorded in an inspection log that is maintained in the Operating Record for the Facility.  | Yes |
| (viii) |       | The Permittee shall ensure that when using the Mix-Tub, all waste, rinsate collected or material added for solidification or stabilization purposes, remains in the Mix-Tub, and does not spill out of or leave the Mix-Tub.  | Yes |
| (ix)   | (I)   | The Permittee shall not stabilize different hazardous wastes – those with different EPA Hazardous Wastes Codes - in the Mix-Tub at the same time, unless:   |     |
|        | (A)   | When the waste being stabilized arrived at the Facility it contained different wastes codes as noted on the manifest accompanying such waste, provided after arriving at the Facility the Permittee does not add any other waste to such waste; or  | Yes |
|        | (B)   | The EPA Hazardous Wastes Codes for the waste to be stabilized together are D004, D005, D006, D007, D008, D009, D010, or D011 and such wastes are not incompatible as determined in accordance with 40 CFR Part 264 Appendix V.  | Yes |
|        | (II)  | The Permittee shall comply with all applicable requirements including, but not limited to, the requirements of this Permit, regarding the waste generated from stabilization in the Mix-Tub. Such compliance shall be based upon the hazardous waste codes for such waste before stabilization and, shall include, but not be limited to, whether after stabilization, such waste satisfies all, or only a portion, of the treatment standards specified in 40 CFR Part 268, Subpart D. The Permittee shall maintain in the Operating Record for the Facility all documentation used to demonstrate such compliance, including, but not limited to, records regarding the waste analysis requirements in 40 CFR 262.11 and the land disposal restrictions in 40 CFR Part 268. | Yes |
| (x)    | (I)   | The Permittee may solidify or bulk more than one waste in the Mix-Tub at the same time, provided such wastes are not incompatible as determined in accordance with 40 CFR Part 264 Appendix V.  | Yes |
|        | (II)  | The Permittee shall comply with all applicable  |     |

requirements including, but not limited to the requirements of this Permit, regarding the waste generated from the solidification or bulking in the Mix-Tub. Such compliance shall include, but not be limited to, compliance with the requirements applicable to each waste added to the resultant mixture (i.e. the resultant mixture shall be managed as containing each waste added to the mixture). The Permittee shall maintain in the Operating Record for the Facility all documentation used to demonstrate such compliance, including, but not limited to, records regarding the waste analysis requirements in 40 CFR 262.11 and the land disposal restrictions in 40 CFR Part 268.

Yes

- (xi) The Permittee shall manage all waste treated in the Mix-Tub as a waste, including waste that has been treated, regardless of whether such waste still exhibits the characteristics of a hazardous waste or can be land disposed under 40 CFR Part 268.

Yes

*Decontamination*

- (xii) (I) The Permittee shall decontaminate the Mix-Tub, as well as equipment used in the solidifying, stabilization or bulking process (i.e., the backhoe or excavator, hoses, shovels, etc.), in accordance with Appendix B of this Section of the Permit, whenever:

- (A) PCBs, at any level, are detected in the Mix-Tub or in any waste in, or added to, the Mix-Tub. Any such decontamination shall include any roll-off or other container, Transportation Vehicle that may have contained waste containing PCBs; or
- (B) All of the waste has been removed from the Mix-Tub and

Yes

- (1) The waste removed, including any rinsate from decontamination, and the waste to be added to the Mix-Tub thereafter are incompatible, as determined in accordance with 40 CFR Part 264, Appendix V; or
- (2) The waste removed contains a listed hazardous waste and the waste to be added to the Mix-Tub thereafter is a non-hazardous waste or is a characteristic hazardous waste.

Yes

Yes

- (xiii) The Permittee shall comply with Appendix B to Section III of this Permit when decontaminating

- (I) the Mix-Tub, any equipment used in the solidifying, stabilization, or bulking process (i.e., the backhoe, or excavator, hoses, shovels, etc.), or a roll-off or other containers, or

Yes

- (II) the waste carrying portion of any Transportation Vehicle, including a Vacuum Truck, whose contents have been emptied into the Mix-Tub or transferred to the On-Site Waste Water Treatment Plant or Tank Systems 11 or 14 from the Mix-Tub, Bulk Storage and Transfer Area, or when decontaminating any equipment used in connection with the transfer process. Yes

*Additional Requirements*

- (xiv) Whenever the Permittee is changing the waste to be solidified, stabilized or bulked in the Mix-Tub, before a new waste is added, the Permittee shall ensure that all wastes are removed from the Mix-Tub and placed into a roll-off container or Transportation Vehicle such that the Mix-Tub is "broom-clean". Yes
- (xv) The Permittee shall ensure that the bulking of hazardous waste does not result in such waste being treated by dilution. The Permittee shall ensure compliance with 40 CFR 268.3 when bulking hazardous waste. Yes
- (xvi) The Permittee shall record and maintain in the Operating Record for the Facility the quantity of waste and solidification and stabilization agents placed into the Mix-Tub each day. Yes
- (xvii) The Permittee shall ensure that when the Mix-Tub is not in use, (when a waste is not being added to, removed from, or mixed in the Mix-Tub), the Mix-Tub is:
- (I) empty; and
- (II) covered with a tarp or plastic liner capable of preventing precipitation, snow, and any other weather-related variable from accumulating in the Mix-Tub and of sufficient strength to prevent any tears.
- (xviii) Before waste is placed into the Mix-Tub for any purpose and while the Mix-Tub is in use, the Permittee shall attach sides or side-panels that prevent waste from leaving the Mix-Tub. The Permittee may remove such panels when removing waste from the Mix-Tub. Yes

**(5) MISCELLANEOUS PROCESSING AREAS.** The Miscellaneous Processing Areas at the Facility are the Drums Crusher Area, the Acidic and Alkaline Rinse Stations and Lab Pack Pour-off Area.

- (a) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding the Drum Crusher Area and the Acidic and Alkaline Rinse Stations:
- (i) The Permittee shall ensure that the rinsing and crushing areas are properly maintained in good working order and do not pose a No

- hazard to human health or the environment;
- (ii) When rinsing and crushing containers the Permittee shall ensure that incompatible waste is not mixed, and these operations do not result in any of the conditions specified in 40 CFR 264.17(b). For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264 Appendix V; Yes
  - (iii) Other than crushed containers, the Permittee shall collect and containerize all waste generated from rinsing and crushing operations, shall characterize such waste in accordance with 40 CFR 262.11 and shall comply with all applicable requirements regarding the management, including disposal, of such waste; and Yes
  - (iv) Other than containers to be rinsed or crushed, as applicable, the Permittee shall not store, keep, or place waste or other materials containers in the areas used for rinsing or crushing containers. Yes
- (b) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding the Acidic and Alkaline Rinse Stations; the Permittee shall not rinse any container that is not empty. Before rinsing containers, the Permittee shall ensure that the container to be rinsed is properly inverted over the water spray nozzle of the rinse station before the water spray is activated. removed
- (c) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding the Drum Crusher Area:
- (i) The Permittee shall not crush any container that is not empty; and Yes
  - (ii) After containers have been crushed in the Drum Crushing Area, the Permittee shall collect and store all of the crushed containers in a covered roll-off container in the Roll-Off Storage Area, Bulk Storage and Transfer Area before shipping such containers off-site. No
- (d) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements regarding pouring off the contents of a lab pack in the Lab Pack Pour-Off Area:
- (i) The Permittee shall not open a lab pack, unless the lab pack is on a containment pallet and shall not open the containers within a lab pack to be poured off unless such containers are over the Lab Pack Pour-Off sink; Yes
  - (ii) Before any waste or other material from a lab pack is poured off into the On-Site Wastewater Treatment Plant, the Permittee shall ensure that a laboratory chemist at the Permittee's facility has authorized the activity and determined that doing so will not cause any of the reactions specified in 40 CFR 264.17(b). In addition, the Permittee shall ensure that such chemist is available on duty at the Facility when the contents of such lab pack are poured into Yes

the On-Site Wastewater Treatment Plant;

- (iii) The Permittee shall ensure that the contents of a lab pack are:
  - (I) in liquid form only (i.e., no solids or semi-solids); Yes
  - (II) poured off only into the lab pack pour-off sink that goes directly into a tank that is part of the On-Site Wastewater Treatment Plant; and Yes
  - (III) authorized to be added to the On-Site Wastewater Treatment Plant by the discharge permit issued by the Commissioner. Yes
- (iv) The Permittee shall ensure that all employees performing the lab pack pour-off activities are trained in the use of required personal protective equipment when performing all pour-off activities. At a minimum, personnel shall become familiar with the use of a Tyvek suit, Kevlar and PVC gloves and appropriate respiratory protection as required by the Personnel Training Plan (PTP) incorporated as Attachment C to this Permit (The PTP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit); Yes
- (v) The Permittee shall ensure that all containers which contents have been poured into the lab pack pour-off sink are empty before the Permittee disposes of any such container. If the container is not empty, the Permittee must treat the waste in any such container as a hazardous waste. The Permittee shall manage, including disposal, all of the empty containers from a lab pack, poured off into the On-site Wastewater Treatment Plant, in accordance with all applicable requirements. Yes

**(6) TRUCK-TO-TRUCK TRANSFER AREA (TTTA)**

- (a) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements in the Truck-to-Truck Transfer Area (TTTA):
  - (i) The Permittee shall comply with the requirements of 49 CFR 177.848 regarding all waste or other material in the TTTA;
  - (ii) If not included in the Inspection Plan (IP) incorporated herein as Attachment B to this Permit (The IP needs approval by the Commissioner after submission by the Permittee in accordance with Section V of this Permit), the Permittee's inspection of the TTTA shall include determining if liquid or other material is being released from any Transportation Vehicle in this area; No
  - (iii) The Permittee shall visually inspect each container of waste brought to the TTTA from a Container Storage Area or Area to Stage Containers, before placing it on a Transportation Vehicle, to Yes



- ensure that each container is closed, not leaking and packaged, labeled and marked as required by 40 CFR 262.30 (Packaging), 262.31 (Labeling) and 262.32 (Marking – “Hazardous Waste” or other designation for non-hazardous waste, with a generic description of the waste, and other relevant information), as applicable and that the labels, marking and packaging correspond to the description of such waste or other materials on the manifest or shipping papers;
- (iv) The Permittee shall keep all containers in the TTTA closed. The Permittee shall not remove waste or other material from any container and shall not transfer any waste or other material from one container to another container, except if the integrity of a container has been compromised. In that event, the Permittee shall place the compromised container in salvage container or transfer the waste or other material in the compromised container to a container in good condition and that is approved by DOT for waste or other material, as applicable. The Permittee shall manage, including disposal, all waste generated from a container whose integrity of has been comprised, in accordance with all applicable requirements; Yes
  - (v) The Permittee shall ensure that container management equipment, such as a drum cart or a forklift truck, is available for use at all times to allow for quick transfer or movement of containers in the TTTA in the event of an emergency; Yes
  - (vi) The Permittee shall ensure that at no time is there a single container with more than 350 gallons of liquids in the TTTA; and Yes
  - (vii) The Permittee shall comply with the requirements of RCSA 22a-209-15(c), 22a-209-15(d) and any other applicable requirement in RCSA 22a-209-15 regarding biomedical waste brought to or transferred in the TTTA. Yes
- (b) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements in each Truck Bay of the Truck-to-Truck Transfer Area:
- (i) Whenever waste or other materials is present in the Truck-to-Truck Transfer Area, the Permittee shall ensure that at all times any Transportation Vehicle in such area can immediately be moved out of the area and, if necessary, a tractor or other auxiliary power unit capable of moving such vehicle is present and available for use at the Facility; and Yes
  - (ii) The Permittee shall ensure that the secondary containment system in the TTTA is:
    - (I) sloped to a sump capable of containing liquids; and Yes
    - (II) capable of preventing the commingling of any wastes, Yes

other materials, or liquids from one Truck Bay into another Truck Bay.

As part of the secondary containment system in the TTTA, the Permittee shall maintain a containment wall or berm, one (1) foot wide along the entire length of the side of each Truck Bay capable of containing and preventing run-on into and run-off out of the Truck Bay.

Yes

**(7) TRUCK PARKING AREAS (TPA 1 and TPA 3)**

(a) In addition to the other requirements of this Permit, the Permittee shall comply with following requirements in the Truck Parking Areas:

(i) Whenever waste or other materials are present on a Transportation Vehicle or in a roll-off container, the Permittee shall ensure that at all times:

Yes

(A) such vehicle or roll-off container can immediately be moved out of the area; and

(B) a tractor or other auxiliary power unit capable of moving such vehicle or roll-off container into or out of the TPA, is present and available, if necessary, for use at the Facility.

Yes

(ii) The Permittee shall comply with the requirements of 49 CFR 177.848 regarding all waste or other material in the TPA;

Yes

(iii) The Permittee shall keep all containers in the TPA closed, shall not add or remove waste or other material, to or from any container, including, but not limited to a roll-off container in the TPA, and shall not transfer any waste or other material from one container to another container, including a roll-off container, except if the integrity of a container has been compromised. In that event, the Permittee shall place the compromised container in a salvage container or transfer the waste or other material in the compromised container, including a roll-off container to a container in good condition and that is approved by DOT for such waste or other material. The Permittee shall manage, including disposal, all waste generated from a container whose integrity of has been comprised, in accordance with this Permit and all applicable requirements;

No

(iv) The Permittee shall ensure that at no time is there a single container with more than 549 gallons of liquids in any Truck Bay, regardless of whether the container is on or is considered to be part of a Transportation Vehicle or a Transportation Vehicle itself is considered to be the container;

Yes

(v) The Permittee shall ensure that the secondary containment system in the TPA is:

- |        |  |     |
|--------|--|-----|
| (I)    | sloped to a sump capable of containing liquids; and  | Yes |
| (II)   | capable of preventing the commingling of any wastes, other materials, or liquids from one Truck Bay into another Truck Bay.  | Yes |
|        | As part of the secondary containment system in the TPA, the Permittee shall maintain a containment wall or berm, one (1) foot wide along the entire length of the side of each Truck Bay capable of containing and preventing run-on into and run-off out of the Truck Bay;  | Yes |
| (vi)   | If not provided for in the Inspection Plan (IP) presented herein as Attachment B to this Permit (The IP needs approval by the Commissioner after submission by the Permittee in conformance with the terms of Section V of this Permit), whenever waste or other materials is present in the TPA, the Permittee shall visually inspect such area daily to determine if liquid or other material is being released from a Transportation Vehicle or whether the integrity of any roll-off container has been compromised; and | Yes |
| (vii)  | If waste or other materials is in a roll-off container, the Permittee shall ensure that each roll-off container has a seal or cover (i.e., tarp or plastic liner) capable of preventing precipitation from entering the roll-off. If a roll-off container does contain free draining liquids, the Permittee shall ensure that such liquid is removed within twenty-four (24) hours from the time of discovery or the time the Permittee should have discovered such liquids.   | No  |
| (viii) | The Permittee shall ensure that container management equipment, such as a drum cart or a forklift truck, is available for use at all times to allow for quick transfer or movement of containers in the TPA in the event of an emergency.  | Yes |

## APPENDIX A TO SECTION III

### ADDITIONAL ITEMS TO BE INCLUDED IN THIRD-PARTY AUDITS

At a minimum, in addition to Permit Condition II(A)(44), the following items are to be included in the third-party audits:

- A. Operational Records:
- (1) The focus under these items is maintenance, calibration (as appropriate) and continuous operation (or documenting instances of downtime, where appropriate):
    - (i) Caustic air scrubber (including air fan, water pump(s) and caustic metering pump(s); Yes
    - (ii) Toxic gas detectors; and
    - (iii) Waste treatment and tank headspace sensors.
  - (2) Noting any instances of process control automated shutdown failures (high temperature, pH and tank volume). Include a brief narrative of the response actions in each case. Yes
  - (3) Noting any instances of positive detections in any of the toxic gas detectors. Include a brief narrative of the circumstances and response actions taken in each case. Yes
  - (4) Evaluate records with regard to assessing waste compatibility. Noting any anomalies resulting from that program (identification of unexpected waste incompatibility). Yes
  - (5) Recording any instance of spilled materials coming in contact with an incompatible material (if any).
- B. Rejected Waste Loads. Summarize in a table each instance of a rejected waste load, the reason for the rejection, where the waste originated, type of waste, and ultimate disposition (re-shipped to another location; returned to the generator; revised profile and accepted). See page 5
- C. City of Bristol Fire Chief Visits. Contact the City of Bristol Fire Chief and summarize any concerns raised, if any, with regard to his visits during the evaluation year. Yes
- D. General Housekeeping: Summarize the following kinds of indicators of general housekeeping found at the time of the audit inspection:
- (1) Summarize in a table the releases at the Facility: which area; type of vessel involved; cause of release. Group like incidents together. Compare numbers to previous year of records, since this manner of summary was begun. See page 20

- |     |  |     |
|-----|--|-----|
| (2) | Note any areas of the facility during the visit that are not accessible (when they are supposed to be) and for what reason (if any). | Yes |
| (3) | Note the general condition of the epoxy floor coatings, painted areas designating storage limits, warning signs.                     | Yes |
| (4) | Note any pumps, hoses or other tools or equipment deployed in a work area, but not being used (left unattended).                     | Yes |
| (5) | Note the conditions and accessibility of logbooks.   | Yes |
| (6) | Note the condition and general appearance of the laboratory.   | Yes |
| (7) | Note the general appearance and condition of container storage and truck to truck transfer areas.                                    | Yes |
| (8) | Note the general appearance and condition of secondary containment areas.  | Yes |
| (9) | Take photographs, as appropriate and as allowed by facility policies, to document conditions found.                                  | Yes |

### APPENDIX B TO SECTION III DECONTAMINATION PROCEDURES

When Section III of this Permit specifies that decontamination shall be performed in accordance with Appendix B of this Permit, the following shall apply:

- (I) The Permittee shall begin by ensuring that all waste or other materials are removed from the item undergoing decontamination, such that the item is “empty”. For the Mix-Tub, the Permittee shall ensure that all wastes are removed from the Mix-Tub and placed into a roll-off container or Transportation Vehicle such that the Mix-Tub is “broom-clean.” Yes
- (II) The Permittee shall rinse the item being decontaminated with clean water only, unless:
  - (A) Use of clean water is not standard in the industry, in which case the Permittee shall rinse the item being decontaminated using materials that are standard in the industry; or Yes
  - (B) Rinsing with clean water could potentially cause an adverse reaction, such as those specified in 40 CFR 264.17(b) (1) through (5), inclusive, in which case the Permittee shall rinse the item being decontaminated using a material that does not cause any such reaction and is standard in the industry for such rinsing; Yes
- (III) The Permittee shall ensure that any such decontamination:
  - (A) Meets any applicable standard (e.g., triple rinsing if the item undergoing decontamination held, contained, or was used to transfer an acute hazardous waste); Yes
  - (B) Prevents hazardous waste residues from contaminating non-hazardous waste; and Yes
  - (C) Protects against any harms resulting from incompatible wastes, as determined by 40 CFR Part 264, Appendix V, including any residues in the item being decontaminated; Yes
- (IV) The Permittee shall ensure that, except as provided for in V(C) of this Appendix, all rinsate from decontamination is Yes
  - (A) Collected in containers; or
  - (B) Transferred, to the On-Site Waste Wastewater Treatment Plant or to Tank Systems 11 or 14, provided the Permittee is authorized to receive such rinsate at the On-Site Wastewater Treatment Plant or Tank Systems 11 or 14. Yes
- (V) Rinsate from the decontamination of roll-off or other containers, Transportation Vehicles, including any Vacuum Truck that held waste transferred into the Mix-Tub may be placed into the Mix-Tub provided that;
  - (A) The Permittee may add such rinsate to the Mix-Tub only to serve as a reagent for the stabilization of hazardous waste – and for no other purpose (i.e., rinsate cannot be added to waste being solidified or bulked); Yes

- |        |   |     |
|--------|---|-----|
| (B)    | If there is no waste in the Mix-Tub at the time such rinsate is added to the Mix-tub, the Permittee shall remove and collect all such rinsate before adding any waste to the Mix-Tub and all collected rinsate shall be transferred to the On-Site Waste Wastewater Treatment Plant or to Tank Systems 11 or 14, provided the Permittee is authorized to receive such rinsate at the On-Site Wastewater Treatment Plant or Tank Systems 11 or 14; and | Yes |
| (C)    | The Permittee manage all rinsate put into the Mix-Tub as containing all of the wastes removed from the container, roll-off container, or Transportation Vehicle before decontamination, including, but not limited to, all hazardous waste codes;   | Yes |
| (VI)   | The Permittee shall ensure that after collection or transfer, all rinsate from decontamination is managed in accordance with all applicable requirements, including, but not limited to, the requirements of this Permit; and   | Yes |
| (VII)  | The Permittee shall maintain in the Operating Record for the Facility all documentation used to demonstrate compliance with this provision, including, but not limited to, records regarding compliance with the waste analysis requirements in 40 CFR 262.11 and the land disposal restrictions in 40 CFR Part 268 regarding any waste generated from the decontamination process.   | Yes |
| (VIII) | The Permittee shall collect a sample to verify that the area has been decontaminated.   | Yes |

**APPENDIX C TO SECTION III  
EXAMPLE OF A TANK CLEANING CERTIFICATE**

NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
EPA ID NUMBER: \_\_\_\_\_

**TANK CLEANING CERTIFICATE**

I/We being the person(s) responsible (as indicated by my/our signature(s) below) for the cleaning of the tanks listed below state that I/we have been trained in tank decontamination requirements and procedures, including, but not limited to the decontamination requirements of this Permit regarding decontamination of tanks, and that the decontamination for which I/we have been responsible for is, to the best of my/our knowledge and belief, in compliance with Permit No. DEEP/HWM-017-004 and NFPA 326, Standard for the Safeguarding of Tanks and Containers for Entry, Cleaning, or Repair, latest edition.

<b>TANK No.</b>	<b>TANK WASTE</b>	<b>TANK COATED/UNCOATED</b>

Number of Continuation Sheet(s): \_\_\_\_\_

NAME (In block letters): \_\_\_\_\_

POSITION: \_\_\_\_\_

For and on behalf of:

Address: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_





**ATTACHMENT A**  
**Import/Export requirements**

**ATTACHMENT A  
IMPORT/EXPORT REQUIREMENT**

40 CFR 262.20 & 50-58  
40 CFR 265.12  
40 CFR 273.20, 40 & 56

22a-449(c)-102(a)  
22a-449(c)-105(a)(1)  
22a-449(c)-113(a)(1)

Has any waste been exported/ imported during the last three years?	Yes- exported to Canada
<b>Exports:</b>	
<ul style="list-style-type: none"> <li>• Current "Acknowledgement of Consent" form attached to manifest for each export shipment</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Annual report filed with EPA's administrator by March 1st of each year</li> </ul>	Unknown. Information was requested but not provided during the audit.
<ul style="list-style-type: none"> <li>• Any exception reports on file? If yes, explain:</li> </ul>	None provided
<ul style="list-style-type: none"> <li>• Completed special manifest requirements ( i.e., additional language)</li> </ul>	Canadian manifests reviewed
<b>Imports:</b>	
<ul style="list-style-type: none"> <li>• Are wastes received from a foreign source?</li> </ul>	No
<ul style="list-style-type: none"> <li>• If yes, has notice been filed with EPA</li> </ul>	NA

Comments:

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**ATTACHMENT B**  
**Spent Lead Acid Batteries Being Recycled**

**ATTACHMENT B  
SPENT LEAD ACID BATTERIES BEING RECYCLED**

40 CFR 266 Subpart G  
40 CFR 273

22a-449(c)-106(a) & (c)  
22a -449(c)-113

<b>Storage and Handling:</b>	
• Does the facility manage lead-acid batteries being reclaimed?	Yes
• If yes, does the facility	<input type="checkbox"/> generate <input checked="" type="checkbox"/> receive from off-site <input type="checkbox"/> reclaim on-site
• Batteries open or closed	Batteries not observed on-site at time of audit
• Evidence of leaks, ruptures, spills or poor handling procedures	NA
• Separation from incompatibles	NA
• Stored on an impermeable surface	NA
• Inspected weekly (schedule and log)	NA
• Accumulation over 20,000 kg	No
• If yes, has a "Recycling Registration" been filed	NA
<b>Treatment:</b>	
• Are batteries cracked or processed on-site	No
• Do they have a permit for this activity	No

Comments:

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**ATTACHMENT C**  
**Recycle/Reclaim**

**ATTACHMENT C  
RECYCLE/RECLAIM**

40 CFR 266 Subparts C-G 22a-449(c)-101(c) & 106

Is hazardous waste recycled on-site?	No
• If yes, does the closed loop exemption apply?	NA
• Or, has a "Recycling Registration" been filed?	NA

Comments:

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**ATTACHMENT D**  
**Use Constituting Disposal**



**ATTACHMENT D  
USE CONSTITUTING DISPOSAL**

40 CFR 266 Subpart C

22a-449(c)-106(a)

Are any recyclable materials used in a manner constituting disposal?	No
• If yes, explain:	NA

Comments:

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**ATTACHMENT E**  
**Accumulation for Recycling**

**ATTACHMENT E  
ACCUMULATION FOR RECYCLING**

40 CFR 261.1(c)(8) & 261.6                      22a-449(c)-101(a) &(c)  
40 CFR 273 subparts B & C 22a-449(c)-113(a)(1)

Accumulation in tanks? (if yes, also complete tank section)	Yes – Used Oil (refer to Attachment H)
Approximate number of containers	1 roll-off
Type of material	Metal generated by drum crushing of empty containers for recycling
Contents identified	Yes
Accumulation date present or inventory system (universal waste)	Yes
Less than one year storage?	No- label on roll-off container states accumulation start date of 05/12/2021
Is documentation available that the material:	
<ul style="list-style-type: none"> <li>Is potentially recyclable and has a feasible means of being recycled (explain)?</li> </ul>	Yes. Metal is commonly recycled
<ul style="list-style-type: none"> <li>All recycled within one year of accumulation dates (explain)?</li> </ul>	No- accumulation start date noted is greater than one year

Comments: A roll-off container holding “metal for recycling” was present in the parking lot on 9/14/2022. Rain water was observed dripping from the bottom of the roll-off container, as the cover was not attached tightly. On 9/15/2022 the roll-off container was moved to Truck Parking Area 1 and no dripping water was observed.

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**ATTACHMENT F**  
**Scrap Metals**

**ATTACHMENT F  
SCRAP METALS**

40 CFR 261.1(c)(6) & 261.6(a)(3)

22a-449(c)-101(a) & (c)

Does the facility generate, accept, store, treat, or dispose of any waste scrap metals which are ignitable or reactive?	No
<ul style="list-style-type: none"><li>• If yes, are the materials being handled as hazardous waste?</li></ul>	NA

Comments:

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**ATTACHMENT G**  
**Precious Metal Recovery**

**ATTACHMENT G  
PRECIOUS METAL RECOVERY**

40 CFR 266 Subpart F

22a-449(c)-106(a)

Are precious metals: generated stored treated disposed?	No
If yes, are all shipments manifested (if no, explain)?	NA
Are inventories maintained?	NA
Are all wastes recycled within one year of accumulation dates?	NA
Is material potentially recyclable?	NA
Does the material have a means of being recycled?	NA
Does the contact claim it is economically feasible to recycle it?	NA

Comments:

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**ATTACHMENT H**  
**Used Oil – Collection Center & Aggregation Point Requirements**



**ATTACHMENT H  
USED OIL--COLLECTION CENTER &  
AGGREGATION POINT REQUIREMENTS**

40 CFR 279 Subpart D

22a-449(c)-119(a) & (e)

Does the facility receive used oil from off-site (If no, skip remainder of section)?	Yes
If yes, does the facility only receive used oil that is:	
<ul style="list-style-type: none"> <li>• From facilities that it owns or operates?</li> </ul>	No
<ul style="list-style-type: none"> <li>• In shipments of 55 gallons or less?</li> </ul>	Most used oil is delivered by tanker truck. Some off-spec used oil is delivered to the site in 55 gallon drums.
<ul style="list-style-type: none"> <li>• In vehicles owned by the generator or an employee of the generator?</li> </ul>	No
(If all three conditions apply, the facility is regulated as an aggregation point. If only conditions two and three apply, the facility is regulated as a collection center. In all other cases, the facility is a used oil transfer facility (see separate section below.)	
If the facility is a collection center, does it have a permit for this activity?	No
List the site(s) shipping used oil to this location	Misc customers ship used oil to the site, including Rand-Whitney, Kropp Environmental (based on records review)
List off-site destination(s) for used oil stored at this site	Clean Harbors Environmental Services – Southport, ME

Comments: \_\_\_\_\_

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**ATTACHMENT I**  
**Used Oil Transfer Facility Requirements**

**ATTACHMENT I  
USED OIL--TRANSFER FACILITY REQUIREMENTS**

40 CFR 279.45

22a-449(c)-119(a), (c), & (e)

Does the facility receive used oil from off-site (If no, skip remainder of section)?	Yes
Is the facility's only off-site receipt of used oil from collection centers and/or aggregation points as described in the above section for these types of facilities? (If yes, skip remainder of section.)	No
Does the facility store used oil for more than 10 days? (If yes, stop here and go to processor section.)	Yes
Is used oil that is received from off-site managed in accordance with the following transfer facility requirements:	NA
• Total halogen determinations and rebuttable presumption	NA
• Retention of total halogen determination records for at least three years	NA
• Storage in tanks or containers that are in good condition and not leaking	NA
• Provided with impervious base and secondary containment	NA
• Labeled or marked with the words "used oil"	NA
• Shipped off-site via transporters that are permitted and have notified EPA	NA
Is the facility also in compliance with the following used oil transporter requirements (see above section):	NA
• Notification and obtaining an EPA ID Number	NA
• Records of used oil shipments	NA
• Secondary containment for transfers from one transport vehicle to another	NA
Has the facility had any known releases of used oil	NA
• If yes, did the facility: ___ Report the spill to DEEP, and ___ Comply with "response to release" requirements (Explain)	NA
Is the facility engaged in the business of storage of used oil?	NA
If yes, does the facility have a 22a-454 storage permit?	NA
List the site(s) shipping used oil to this location	NA
List off-site destination(s) for used oil stored at this site	NA

Comments: \*

**ATTACHMENT J**  
**Used Oil – Processor & Re-refiner Requirements**

**ATTACHMENT J  
USED OIL--PROCESSOR & RE-REFINER REQUIREMENTS**

40 CFR 279 Subpart F

22a-449(c)-119(a), (d), & (e)

Is the facility either of the following:	
<ul style="list-style-type: none"> <li>• A used oil transfer facility which stores used oil on-site for greater than ten days?</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• A processor or re-refiner of used oil at the site? (If no to both questions, skip remainder of section)</li> </ul>	No
Is the facility's used oil processing limited to one or more of the following activities: (If yes, skip remainder of section)	
<ul style="list-style-type: none"> <li>• Allowed generator processing activities as specified in 40 CFR 279.20(b)(2)(ii)(A)-(E)?</li> </ul>	No
<ul style="list-style-type: none"> <li>• Incidental processing by transporters that occurs in the normal course of transportation (e.g., settling and water separation), but that is not designed to produce used oil products?</li> </ul>	No
<ul style="list-style-type: none"> <li>• Filtration of used oil that is removed from electrical transformers and/or turbines by a transporter or transfer facility prior to being returned to its original use?</li> </ul>	No
<ul style="list-style-type: none"> <li>• Incidental processing conducted by burners during the normal course of used oil management prior to being burned on-site?</li> </ul>	No
Is the facility in compliance with the following processor requirements:	
<ul style="list-style-type: none"> <li>• Total halogen determinations and rebuttable presumption</li> </ul>	Yes- total halogen test procedures are detailed in the site's Waste Analysis Plan
<ul style="list-style-type: none"> <li>• Retention of total halogen determination records for at least three years</li> </ul>	Records are kept onsite
<ul style="list-style-type: none"> <li>• Storage in tanks or containers that are in good condition and not leaking</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Tank and container storage areas provided with impervious base and secondary containment:</li> </ul>	Yes- Tank 14 is double walled and has an impervious base
<ul style="list-style-type: none"> <li>• Tanks and containers labeled or marked with the words "used oil"</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Notification/obtaining an EPA ID Number (40 CFR 279.51)</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Preparedness and Prevention (40 CFR 279.52(a) and RCSA Section 22a-449(c)-119(a)(2)(II))</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Contingency Plan and Emergency Procedures (40 CFR 279.52(b))</li> </ul>	Yes- spill procedure are included in the plan
<ul style="list-style-type: none"> <li>• Closure (40 CFR 279.55(h) and RCSA Section 22a-449(c)-119(d))</li> </ul>	NA- no units have been closed
<ul style="list-style-type: none"> <li>• Waste Analysis Plan (40 CFR 279.55)</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Tracking records (40 CFR 279.56)</li> </ul>	Yes
<ul style="list-style-type: none"> <li>• Operating Records and Reporting (40 CFR 279.57 and RCSA Section 22a-449(c)-119(a)(2)(AAA))</li> </ul>	Yes

• If no to any of the above, explain:	NA
Is used oil shipped off-site via transporters that are permitted and have notified EPA?	Yes
Does on-site processing of used oil produce any wastes or residues?	NA – storage only
• If yes, are these materials properly managed as used oil(s) or hazardous waste(s)? (Explain)	NA
Is the facility engaged in the business of storage and/or processing of used oil:	Yes
• If yes, does the facility have a 22a-454 permit for these activities?	Yes
List the site(s) shipping used oil to this facility:	Rand-Whitney, Kropp Environmental
List off-site destination(s) for used oil stored or processed at this facility:	Clean Harbors Environmental Services of Braintree

Comments: There are other customers that ship used oil to this facility. These two generators were observed during records review.

**ATTACHMENT K**  
**Used Oil – Marketer Requirements**

**ATTACHMENT K  
USED OIL--MARKETER REQUIREMENTS**

40 CFR 279 Subpart H

22a-449(c)-119(a)

Does the generator market used oil?	No
• If yes, which of the following marketer activities is the generator engaged in:	NA
○ Sending off-spec oil directly to a burner	NA
○ First declaring used oil to be on-spec	NA
Has the facility notified EPA and obtained an EPA ID Number?	NA
Does all used oil fuel (whether on- or off-spec) have a fuel value of at least 5000 btu/lb?	NA
If the facility is the first to claim that used oil is on-specification:	NA
• Is the used oil tested for the specification by approved methods?	NA
• Are copies of analyses kept for at least three years?	NA
• Are records of all shipments of on-spec used oil to a burner retained for at least three years?	NA
○ Do these records include:	NA
○ The name and address of the facility receiving the shipment?	NA
○ The quantity of used oil delivered?	NA
○ The date of the shipment?	NA
○ A cross-reference to the on-spec fuel analysis?	NA
If the facility sends off-spec used oil directly to a burner:	NA
• Are records of all shipments of off-spec used oil to burners retained for at least three years	NA
○ Do these records include:	NA
○ The name, address, and EPA ID Number of the transporter shipping the oil to the burner	NA
○ The name, address, and EPA ID Number of the burner the oil is being sent to	NA
○ The quantity of the off-spec used oil that is shipped	NA
○ The date of shipment	NA
• Does the facility obtain a burner certification from each burner that it ships off-spec used oil to, and are these records retained for at least three years	NA

Comments:

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**ATTACHMENT N**  
**Land Disposal Restriction – Treatment Facility Standards**

**ATTACHMENT N  
LAND DISPOSAL RESTRICTIONS  
TREATMENT FACILITY STANDARDS**

40 CFR 268

22a-449(c)-108

Did the treatment facility perform EPA test method 1311 for wastes or contaminated soil with treatment standards expressed in the waste extract (TCLP)?	Test method 1311 for wastes was conducted on Manifest # 011229518FLE
<ul style="list-style-type: none"> <li>• If yes, did the treatment residue extract meet the applicable treatment standard</li> </ul>	Pursuant to 40 CFR 268.7 (a) the shipment was found to contain waste restricted under 40 CFR Part 268
Did the treatment facility test waste residue (not extract) for wastes or contaminated soil with treatment standards expressed as concentration in the waste?	Yes
<ul style="list-style-type: none"> <li>• If yes, did the test results confirm that the waste meets the applicable treatment standard</li> </ul>	Yes
Did the treatment facility send a one-time notice to the land disposal facility?	Yes- Land Disposal Restriction Notification Form is provided
<ul style="list-style-type: none"> <li>• If yes, did the notice include:</li> </ul>	
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>○ EPA waste codes &amp; manifest document number?</li> </ul> </li> </ul>	Yes
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>○ Constituents of concern for F001-F005 &amp; F039 and underlying hazardous constitutions?</li> </ul> </li> </ul>	Yes
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>○ Applicable wastewater/non-wastewater category and subdivisions based on waste specific criteria?</li> </ul> </li> </ul>	Yes
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>○ Waste analysis date?</li> </ul> </li> </ul>	Yes
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>○ For contaminated soil, the constituents subject to treatment per 268.49(d) and statement "this contaminated soil (does/does not) exhibit a characteristic of hazardous waste and (is subject to/complies with) the soil treatment standards as provided by 268.49(c)"?</li> </ul> </li> </ul>	No shipments of contaminated soil reviewed.
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>○ A certification statement by an agent of the business, applicable to the appropriate section?</li> </ul> </li> </ul>	Yes
Does the treatment facility retain copies of this information in its files for a minimum of three years?	Yes
If the waste or treatment residue will be further managed at a different facility, has the required notices and certifications been sent to the facility?	Yes

Comments:

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**ATTACHMENT S**  
**Subpart CC Requirements**

**ATTACHMENT S  
SUBPART CC REQUIREMENTS**

40 CFR 262.34(a)(1)                      22a-449(c)-102(a)(1)

40 CFR 265.1080 – 265.1090            22a-449(c)-105(a)(2)

Did the facility determine the average volatile organic concentration of the hazardous waste in each container or tank exempted from this subpart in accordance with 265.1083(c)(1)? (Explain if no)	Yes- waste profiles include volatile organic concentration
If yes, did the facility determine the volatile organic concentration using: <ul style="list-style-type: none"> <li>• direct measurement, or</li> <li>• knowledge of the waste</li> </ul>	Both are used depending on the waste stream
If using direct measurement, does it have a written sampling and analysis plan that describes the procedures by which representative samples will be collected and handled?	Yes- Waste Analysis Plan was submitted to CT DEEP on 09/15/2021
If using knowledge of the waste, is there documentation of the information used as the basis for this determination?	Yes- this is provided in the waste profile sheet
Does the facility operate a closed-vent system with control device? (describe if yes)	No
If yes, does the facility have a written design analysis?	NA
If yes, does the design analysis contain all of the items required in accordance with 265.1035(b)(4)?	NA
Does the facility have a certification signed and dated by the owner or operator that the control device is designed to operate at the performance level designated in the design analysis?	NA

**TANKS**

If the facility manages hazardous waste with volatile organic concentrations equal or greater than 500 ppm/wt (on an average annual basis) **in tanks**, complete the following table for the tanks managing this waste.

TANK ID	TANK CAPACITY (gallons)	WASTE TYPE	DESIGN (fixed or floating roof)	LEVEL OF CONTROL (1,2 or 3)
NA				

**TANKS, CONT.**

For a fixed-roof tank using Level 1 Controls, did the facility determine the maximum vapor pressure of the waste?	NA
<ul style="list-style-type: none"> <li>If yes, did the facility record the results of the maximum vapor pressure determination.</li> </ul>	NA
Did the facility inspect the fixed roof and its closure devices immediately upon putting the tank into service and at least once per year?	NA
In the event of a defect involving a tank system, did the facility make first repairs no later than five calendar days after detection and complete repairs no later than 45 calendar days after detection?	NA
If a floating roof tank is used, has the facility notified the Regional Administrator 30 days prior to a planned inspection and as soon as possible in the case of an unplanned inspection?	NA
Are tank(s) used for waste stabilization utilizing a Level 2 control?	NA

Comments: The facility is not subject to Subpart CC.

**CONTAINERS**

If the facility manages hazardous waste with volatile organic concentrations equal or greater than 500 ppm/wt (on an average annual basis) in containers, check the appropriate boxes for the level(s) of control utilized:	
<ul style="list-style-type: none"> <li>Level 1 Controls (&gt;26 gal. to 122 gal. and &gt;122 gal. container <b>NOT</b> in light material service)</li> </ul>	X
<ul style="list-style-type: none"> <li>Level 2 Controls (&gt;122 gal. container <b>IN</b> light material service)</li> </ul>	
<ul style="list-style-type: none"> <li>Level 3 Controls (&gt;26 gal. container used for a waste stabilization process)</li> </ul>	
For containers greater than 122 gallons that <b>do not</b> meet DOT requirements, does the facility maintain a copy of the procedure(s) used to determine that such containers are not managing hazardous waste in light material service?	NA
In the event of a defect involving a container using Container Level 1 or Level 2 controls, did the facility make first repairs no later than 24 hours after detection and complete repairs no later than 5 calendar days after detection? (explain if no)	NA

**RCRA GROUNDWATER MONITORING**

40 CFR 265 Subpart F      22a-449(c)-105(c)  
 40 CRR 270.14(c)          22a-449(c)-110

**Monitoring Status**

Is the facility currently conducting RCRA groundwater monitoring?	<b>No</b>
If yes, complete rest of the checklist. If no, skip checklist and state the contact's reason for not monitoring.	<b>NA</b>

**Documents**

Are documents kept on-site?	NA
Documents are kept where?	NA
Monitoring plan	NA
• Monitoring Plan on-site	NA
• Plan includes map with wells	NA
Monitoring Reports:	NA
• Quarterly/Semi-annual reports on file	NA
• Annual reports on file	NA
Quarterly/Semi-annual report submittals:	NA
• Last sampling date:	NA
• Date DEEP received report	NA
• Previous sampling date	NA
• Date DEEP received report	NA
Annual report submittals:	NA
• Latest year	NA
• Date DEEP received report	NA
• Previous year	NA
• Date DEEP received report	NA

**Site conditions**

Actual well locations agree with facility map	NA
Wells in overall good condition with caps and locks	NA
• If no, which wells are not and why	NA
Identify any new wells installed:	NA

Comments: \_Management indicated groundwater monitoring wells are not onsite.