

January 3, 2024

Paul Franson
Connecticut Department of
Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

**Re: Third-Party Audit Report – Response to Comments – Drum Rinse Station
Clean Harbors of Connecticut, Inc.**

Dear Mr. Franson:

This letter serves as a formal response to the virtual meeting held on November 30, 2023, involving representatives of ALL4, Clean Harbors, and DEEP, regarding the Audit completed at Clean Harbor’s Facility, 51 Broderick Road, CT 06010 (Facility). The meeting's purpose was to address discrepancies identified in the Audit report and the October 31, 2023, Response to Comments letter, specifically concerning the discrepancy between the observation recorded within the Audit report and the current conditions at the Facility, specifically the drum rinse stations and associated signage.

We acknowledge the concerns raised regarding the misrepresentation of the drum rinse stations and signage at the Facility in the Audit report. The Audit report indicates in response to Permit Citation II(A)(6)(a) that the Auditor *“Did not observe drum rising during site visit. Separate stations are present and labeled for the specific materials present.”* Upon reviewing field notes and other documentation, it has been confirmed that the language used within the Audit report was incorrect.

Field notes indicate the Auditor observed Tank 29, Hazardous Waste Metal Bearing Liquids, 1000-gallon tank, the wastewater treatment system control and monitoring panel as well as several hoses and storage for pumps utilized in the wastewater treatment area. The field notes did not indicate that drum rinsing stations were present during the Audit. Signage concerning the various activities in the vicinity was also observed. To clarify, the drum crusher and pour-off station have signage, but there is no signage relating to the former drum rinse stations.

Following this discrepancy, the Auditor has confirmed with the Facility the operations present in the former drum rinsing area. To ensure accurate representation of the Facility's operations, a revised Audit report has been prepared and is included as Attachment A. This revised Audit report incorporates corrected observations regarding the former drum rinsing area. For clarity, the previous observations are indicated with ~~strikethrough text~~, while updated observations are presented in *italics*. In addition, a

photographic log, of the former drum rinsing area and current operations is included as Attachment B. The photographic log consists of photos taken by the Facility, post audit.

Should you have any questions about this submittal, please feel free to contact Daniel Brese at 610-422-1108 or dbrese@all4inc.com.

Sincerely,

ALL4 LLC

A handwritten signature in black ink that reads "Daniel Brese".

Daniel Brese

Project Manager

cc: Wallace Bell (Clean Harbors)
Jim Childress (Clean Harbors)
Kathryn Bailly (Clean Harbors)
Karen Thompson, CHMM (ALL4)

Attachments: Attachment A – *Revised* Audit Report
Attachment B – Photographic Log

**ATTACHMENT A -
REVISED AUDIT REPORT**

Table A-1
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT

Audit Location	Clean Harbors of Connecticut, Inc. 51 Broderick Road, Bristol CT, 06010
Audit Date(s)	September 6-7, 2023
Auditors (name and affiliation)	Karen Thompson, CHMM, (ALL4 LLC) Kyle Costello (ALL4 LLC)
Primary Client Representatives	Kathryn Bailly - General Manager, Wallace Bell - Senior Manager, Environmental Compliance
Audit Goals	Permit Compliance
Audit Scope	Audit of: Permit Renewal to Operate A Commercial Hazardous Waste Storage and Treatment Facility and Connecticut 22A-454 Waste Facility. Permit No. DEEP/HWM-017-004
Weather Conditions	9/6/2023 - Sunny, 85-90°F 9/7/2023 - Sunny, 85-90°F Last Precipitation Event - 8/30/2023

**Table A-2-1
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
Section I - General Conditions							
I(A)	Not Applicable (N/A)	Design and Operation	The Permittee shall operate, maintain and repair the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, which could threaten human health or the environment.	In Compliance	Observed the Facility in good condition and all findings were corrected during or as soon as possible after the audit.	Site Wide	
I(E)(5)	N/A	Duties	The Permittee shall at all times properly operate and maintain the Facility and all systems of storage and control (and related appurtenances) installed or used by the Permittee to achieve compliance with this Permit. Proper operation and maintenance, at a minimum, includes effective performance, adequate funding, adequate operator staffing and training, and adequate analytical data, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit.	In Compliance	All findings were corrected during or as soon as possible after the audit.	Site Wide	
I(E)(10)	40 CFR 264.73(b)(9)	Records	(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Permit, the certification required by 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit and comply with the requirements of this Permit, for a period of at least three (3) years from the date of the sample, measurement, certification, report or application. The Permittee shall maintain records from all groundwater-monitoring wells and associated groundwater surface elevations, for the active life of the facility.	In Compliance	Observed representative records stored in Win-Web, Clean Harbor's Environmental Management System, all records are kept indefinitely.	Site Wide	
I(E)(13)	N/A	Records	Review Reporting Requirements and understanding. (24 hr., 5 day written)	In Compliance	Evaluated spill history and documentation for reporting was provided. All records show reporting was completed on-time.	Site Wide	
I(E)(15)	N/A	Records	Waste minimization. The Permittee shall have a program in place to reduce the volume and toxicity of hazardous waste that the Facility generates to the degree determined by the Permittee to be economically practicable;	In Compliance	Observed Waste Minimization Plan document.	Site Wide	

Acronyms and Abbreviations	
ASC	Area to Stage Containers
BULA	Bulk Unloading and Loading Area
CSA	Container Storage Area
MBSTA	Mix-tub, Bulk Storage and Transfer Area
MPA	Miscellaneous Processing Areas
PTP	Personnel Training Plan
TPA	Truck Parking Areas 1 and 3 : For Up to 10-Days or Less
TTTA	Truck-to-Truck Transfer Area, Including Loading/Unloading Dock (Containers)
WAP	Waste Analysis Plan
WMA	Waste Management Area

Table A-2- II
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
Section II - Permitted Actives							
II(A)	Not Applicable (N/A)	Waste Management Areas	Prohibited Wastes and Other Materials – Tanks 11 and 14. The Permittee shall not bring to, place within, or allow in Tank Systems 11 or 14: (i) Any waste or other material not authorized under the Section II(A)(4)(c) of this Permit; (ii) Any waste or other material specified in Section II(B)(1) of this Permit; (iii) Waste or other materials containing PCBs; (iv) Any hazardous waste with a Volatile Organic concentration equal to or greater than 500 parts per million by weight; (v) Any hazardous waste specified in 40 CFR 261.23; (vi) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column+E32172.101 table.	In Compliance	No prohibited wastes or other materials were observed onsite during the site visit. Records in Win-Web confirmed observations.	Tanks 11 and 14	
II(A)(1)(a)	N/A	Container Storage	The Permittee is authorized to store containers, not including roll-off containers, of wastes or other materials in the Container Storage Areas.	In Compliance	Observed no roll-offs or other materials in the container storage areas.	Container Storage Areas	
II(A)(1)(c)	N/A	Container Storage	The Permittee shall ensure that at no time does the total volume or amount of waste or other material in each CSA exceed permitted amounts the following (See Table Page II-5)	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts.	Container Storage Areas	
II(A)(1)(d)(i)	N/A	Permitted Wastes	Provided it is not otherwise prohibited by this Permit, only the following wastes or other materials are permitted in Container Storage Areas B, D, E, F, G, K, L or J, (any Container Storage Area, except Container Storage Areas A and C):	In Compliance	Prohibited materials were not observed onsite during the site visit.	Container Storage Areas	
II(A)(1)(e)	49 CFR 173.127 (Class 5 Division 5.1, 49 CFR 172.101, 49 CFR 173.132 (Class 6, Division 6.1)	Prohibited Wastes	The Permittee shall not bring to, place within, or allow in any Container Storage Area: (i) Any waste or other material specified in Section II (B)(1) of this Permit; (ii) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1)assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for oxidizers in lab packs containers; (iii) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for waste or other materials in Lab Packs 1 liter or less for liquids or 2.85 kilograms or less for solids.	In Compliance	Prohibited materials were not observed onsite during the site visit.	Container Storage Areas	
II(A)(1)(f)	N/A	Prohibited Wastes	Page II-7, II-8, II-9, II-10 (Review of manifests, operational logs)	In Compliance	Operational Log and Manifests were reviewed in Win-Web. No prohibited wastes were identified.	Container Storage Areas	
II(A)(2)(a)	N/A	BULA	Authorized Activity. The Bulk Unloading and Loading Area (“BULA”) is 55 feet by 11.25 feet, identified on Drawing No. 62WC-7100-204 WMASP. The Permittee shall not use any other area of the Facility as part of the BULA.	In Compliance	Observed no other areas being utilized as the BULA.	Site Wide	
II(A)(2)(a)(i-vi)	N/A	BULA	In the BULA the Permittee is authorized to: (i) Pump waste or other materials in liquid form from a Transportation Vehicle or from containers to the On-Site Wastewater Treatment System; (ii) Pump waste in liquid form from a Transportation Vehicle or from containers into Tanks 11 or 14; (iii) Load, in a Transportation Vehicle, waste in liquid form that is pumped from Tanks 11 or 14 for off-site shipment; (iv) Pump waste in liquid form from one Transportation Vehicle into another Transportation Vehicle; (v) Pump waste or other material in liquid form from a Transportation Vehicle into a container; and (vi) Store flammable waste or diesel fuel for use at the Facility in containers in CSA - C as provided for in Section II(A)(1) of this Permit.	In Compliance	Did not observe these activities during the site visit. Reviewed operational log and records in Win-Web.	BULA	

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II(A)(2)(b)	40 CFR 262.34	BULA	Other than the accumulation of sludge from the filter press of the On-Site Wastewater Treatment Plant, which is subject to regulation under 40 CFR 262.34 if it is a hazardous waste and if not, is a CR05 non-hazardous waste, the Permittee shall not bring to, place within, process, store, treat, mix, dispose of, or otherwise manage waste or other material in the BULA in any way that is not authorized by this Permit.	In Compliance	Observed no prohibited materials within the BULA area. Reviewed operation log and records in Win-Web confirmed observation.	BULA	
II(A)(2)(c)	N/A	BULA	(i) The Permittee shall ensure that at no time does the total volume or amount of waste or other material in the BULA exceed permitted amounts the following: (I) 13,200 gallons of waste on Transportation Vehicles (equivalent to 2-6,000-gallon tankers or 240, 55-gallon containers); and (II) 2,310 gallons of waste (equivalent to 42, 55-gallon containers) in Storage Area C, located in the BULA, as identified on Drawing No. 62WC-7100-201. For purposes of determining compliance with the Permitted Capacity of the BULA each Transportation Vehicle or container in the BULA shall be assumed to be full.	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts.	BULA	
II(A)(2)(d)	N/A	BULA	Permitted Wastes: Provided it is not otherwise prohibited by this Permit, except for the waste and diesel fuel in Container Storage Area C and the area of the BULA used for the accumulation of sludge from the On-Site Wastewater Treatment Plant, only the following wastes or other materials in liquid form are permitted in the BULA:	In Compliance	Did not observe prohibited waste during site visit. Reviewed documentation.	BULA	
II(A)(2)(e)	40 CFR 264.1086(d); 49 CFR 173.127 (Class 5 Division 5.1); 49 CFR 172.101, 49 CFR 173.132 (Class 6, Division 6.1)	BULA	Prohibited Wastes and Other Materials. The Permittee shall not bring to, place within, or allow in the BULA: (i) Any waste or other material not authorized under Sections II (A) (2) (b) and II(A)(2)(d) of this Permit; (ii) Any waste or other material specified in Section II (B) (1) of this Permit; (iii) Any waste or other materials containing PCBs. This includes any PCB Item; (iv) Any hazardous waste with a VO concentration equal to greater than 500 parts per million by weight (500 ppmw); except for containers stored in Area C containing hazardous waste with a VO concentration greater than 500 ppmw that shall comply with the Level Controls as required by 40 CFR 264.1086(d); (v) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; and (vi) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table.	In Compliance	Observed no prohibited materials within the BULA area. Reviewed operation log and records in Win-Web confirmed observation.	BULA	
II(A)(3)	N/A	Stage Containers	Authorized Activity. The Areas to Stage Containers include Areas M1 and M2 and the nine (9) areas designated as Area H. These nine areas have the following dimensions: 2 areas – 25.3 feet x 5.625 (“Areas H1 and H2”) 2 areas - 20.625 feet x 6.25 feet (“Areas H3 and H4”) 2 areas - 9.375 feet x 5.625 feet (“Areas H5 and H6”) 1 area - 14.0 feet x 5.625 feet (“Area H7”) 1 area - 18.75 feet x 6.25 feet (“Area H8”) 1 area – 30 feet x 5.625 feet (“Area H9”)	In Compliance	Observed staged containers within these areas.	Stage Containers Areas	CH-09
II(A)(3)(a)(i)	N/A	Stage Containers	In the nine (9) areas designated as Area H, the Permittee is authorized to: (I) Sample and stage waste or other materials in containers, prior to: (A) Pumping such waste or other materials into the On- Site Wastewater Treatment System; (B) Pumping such waste into tanks 11 or 14; (C) Treating such waste in the Mix-Tub; (D) Relocation to a designated Container Storage Area; or (E) Off-site shipment; (II) Pump wastes or other materials in liquid form from containers into the On-Site Wastewater Treatment Plant; (III) Pump wastes in liquid form from containers into tanks 11 or 14; and (IV) Over-pack containers of waste or other materials whose integrity has been compromised.	In Compliance	Did not observe these activities during the site visit. Reviewed operational log and records in Win-Web.	Area H	

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Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
II(A)(3)(a)(ii)	N/A	Stage Containers	In the nine areas designated as Area H, in addition to the activities specified in Section II(A)(3)(a)(i) of this Permit, the Permittee is authorized to: (I) Open and unpack containers with lab packs and consolidate the containers from these lab packs into other or into larger lab pack containers; and (II) Remove wastes or other materials from lab pack containers to be poured into the lab pack pour-off sink.	In Compliance	Did not observe these activities during the site visit. Reviewed operational log and records in Win-Web.	Area H	
II(A)(3)(a)(iii)	N/A	Stage Containers	In the area designated as M1 the Permittee is authorized to: (I) Sample and stage acidic waste or other material in containers prior to relocation to a designated Container Storage Area; and (II) Over-pack containers of waste or other material whose integrity has been compromised.	In Compliance	Did not observe these activities during the site visit. Reviewed operational log and records in Win-Web.	Area M1	
II(A)(3)(a)(iv)	N/A	Stage Containers	In the area designated as M2, the Permittee is authorized to: (I) Sample and stage alkaline waste or other material in containers prior to relocation to a Container Storage Area; (II) Over-pack containers of waste or other material whose integrity has been compromised; (III) Sort and stage Paint Care Program Waste; and (IV) Sample unlabeled Paint Care Non-Program Waste in accordance with Section III(C)(7)(d) of this Permit.	In Compliance	Did not observe these activities during the site visit. Reviewed operational log and records in Win-Web.	Area M2	CH-09
II(A)(3)(b)	N/A	Stage Containers	The Permittee shall ensure that no container of waste or other material remains in the Areas to Stage Containers longer than five (5) calendar days. In calculating these five (5) calendars days limit, the time a container of waste or other material remains in any Area to Stage Containers shall be included.	In Compliance	Observed no waste over 5 Calander days in the stage containers areas during site visit. Wastes are scanned everyday, a report is run and it notifies facility if waste is approaching or exceed permitted amounted storage timeline.	Stage Containers Areas	
II(A)(3)(c)	N/A	Stage Containers	Permitted Capacity. The Permittee shall ensure that at no time does the total volume or amount of waste or other material in each Area to Stage Containers exceed permitted amounts the following: (i) For Area M1 - 6,820 gallons; (ii) For Area M2 - 4,950 gallons; (iii) For the nine (9) areas designated as Area H: Areas H1 and H2 – 1320 gallons each Areas H3 and H4 – 1100 gallons each Areas H5 and H6 – 440 gallons each Area H7 – 660 gallons Area H8 – 880 gallons Area H9 – 1,540 gallons Area H total combined volumetric capacity is 8,800 gallons. For purposes of determining compliance with the Permitted Capacity of the Area to Stage Containers, each container in any Area to Stage Containers shall be assumed to be full.	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts. Signage at areas specifies total volumes permitted at each material storage location.	Stage Containers Areas	
II(A)(3)(d)	N/A	Stage Containers	Permitted Wastes and Other Materials. Provided it is not otherwise prohibited by this Permit, only the following wastes or other materials are permitted in the Area to Stage Containers: (i) For Area M1 – Acidic Waste or other material only; (ii) For Area M2 – Alkaline waste or other material, Paint Care Program Waste and Paint Care Non-Program Waste only; and (iii) For the nine (9) areas designated as Area H:	In Compliance	Observed no prohibited materials within the Area to Stage Containers area. Reviewed operational log and records in Win-Web confirmed observation.	Stage Containers Areas	
II(A)(3)(e)	40 CFR 264.1086(d); 49 CFR 173.127 (Class 5 Division 5.1); 49 CFR 172.101, 49 CFR 173.132 (Class 6, Division 6.1)	Stage Containers	Prohibited Wastes and Other Materials – All Areas to Stage Containers. The Permittee shall not bring to, place within, or allow in any Area to Stage Containers: (i) Any waste or other material not authorized under Section II(A)(3)(e) of this Permit; (ii) Any waste or other material specified in Section II(B)(1) of this Permit; (iii) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for oxidizers in lab packs containers; and (iv) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for waste or other materials in Lab Packs 1 liter or less for liquids or 2.85 kilograms or less for solids.	In Compliance	Observed no prohibited materials within the Area to Stage Containers area. Reviewed operational log and records in Win-Web confirmed observation.	Stage Containers Areas	

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II(A)(4)	N/A	Tank Systems 11 & 14	The Permittee is prohibited to store in Tank Systems 11 and 14 wastes with Volatile Organic concentrations greater than 500 parts per million by weight (ppmw).	In Compliance	Observed operation log and records in Win-Web that indicate no waste over 500 ppmw is present in Tanks 11 or 14.	Tanks 11 and 14	
II(A)(4)(b)	N/A	Tank Systems 11 & 14	Permitted Capacity. The Permittee shall ensure that at no time does the total volume or amount of waste in Tanks 11 and 14 exceed permitted amounts the following: (i) For Tank 11 - 4,116 gallons; and (ii) For Tank 14 - 10,836 gallons.	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts. Observed permitted capacities are listed on tanks, operation equipment includes high level alarms.	Tanks 11 and 14	CH-13, CH-14
II(A)(4)(c)	N/A	Tank Systems 11 & 14	Provided it is not otherwise prohibited by this Permit, only the following wastes in liquid form are permitted in Tanks Systems 11 or 14:	In Compliance	Observed computer readings indicated liquids within tanks, not over capacity. Reviewed Win-Web documentation indicating correct waste codes for tank.	Tanks 11 and 14	CH-13, CH-14
II(A)(4)(d)	40 CFR 264.1086(d); 49 CFR 173.127 (Class 5 Division 5.1); 49 CFR 172.101, 49 CFR 173.132 (Class 6, Division 6.1)	Tank Systems 11 & 14	Prohibited Wastes and Other Materials – Tanks 11 and 14. The Permittee shall not bring to, place within, or allow in Tank Systems 11 or 14: (i) Any waste or other material not authorized under the Section II(A)(4)(c) of this Permit; (ii) Any waste or other material specified in Section II(B)(1) of this Permit; (iii) Waste or other materials containing PCBs; (iv) Any hazardous waste with a Volatile Organic concentration equal to or greater than 500 parts per million by weight; (v) Any hazardous waste specified in 40 CFR 261.23; (vi) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; and (vii) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table.	In Compliance	Observed no prohibited materials within the Tank 11 and 14 area. Reviewed operational log and records in Win-Web confirmed observation.	Tanks 11 and 15	
II(A)(5)(a)(i)	N/A	MBSTA	Storage (I) The Permittee is authorized to store in the MBSTA for up to, but no more than, thirty (30) calendar days: (A) Wastes in a solid or semi-solid state (i.e., no liquids): (1) In roll-off containers; and (2) In or on a Transportation Vehicle; and (B) Wastes or other materials in a Vacuum Truck. (II) The Permittee shall not use the Mix-Tub for the storage of any waste or other materials. (III) The Permittee shall ensure that no wastes or other materials is stored in the MBSTA for more than thirty (30) calendar days. These thirty (30) calendars day limit shall begin on the date any such container is brought to the MBSTA.	In Compliance	Observed no prohibited wastes during site visit, Reviewed daily scan of all labels report which notifies when materials are approaching permitted timeline. Did not observe any waste over permitted storage time.	MBSTA	
II(A)(5)(a)(ii)	N/A	MBSTA	The Permittee is authorized to pump: (I) Waste or other material in liquid form from a Vacuum Truck in the MBSTA to the On-Site wastewater Treatment Plant, or into a container; (II) Waste in liquid from a Vacuum Truck in the MBSTA into Tank Systems 11 or 14.	In Compliance	Did not observe this activity during site visit. Reviewed operational log and records in Win-Web.	MBSTA	
II(A)(5)(a)(iii-vi)	N/A	MBSTA	(iii) Stabilization in the Mix-Tub. The Permittee is authorized to stabilize certain hazardous waste only in the Mix-Tub, provided that stabilization is performed only by adding in a stabilization reagent such as cement kiln dust, lime or fly ash, to treat hazardous constituents by chemical fixation. (iv) Solidification in the Mix-Tub. The Permittee is authorized to use the Mix-Tub for solidification of waste, including liquids present in a distinct phase one inch or less only, to render such waste more amenable for shipment off-site, treatment or disposal. The Permittee shall solidify such waste only by adding in a solidification agent (e.g., paper pulp, saw dust, corncob grit).	In Compliance	Observed in compliance during operation.	Mix-Tub	

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II(A)(5)(a)(v)	N/A	MBSTA	Bulking. The Permittee is authorized to bulk wastes with similar composition in the Mix-Tub or in roll-off containers, provided: (I) At no time shall RCRA and Non-RCRA wastes be bulked or mixed together at the facility. (II) The waste to be bulked in roll-off containers shall come only from other containers or roll-off containers. (III) The waste to be bulked in the Mix-Tub comes from roll-off containers, other containers, or from a Transportation Vehicle, including a Vacuum Truck. And, (IV) Bulking is performed solely for the purpose of accumulating sufficient quantities for shipment off-site.	In Compliance	Did not observe this activity during site visit. Reviewed operational log and records in Win-Web.	MBSTA	
II(A)(5)(a)(vi)	N/A	MBSTA	In connection with the uses of the Mix-Tub authorized pursuant to Section II(A)(5)(a)(iii)-(v) inclusive of this Permit, the Permittee is authorized to: (I) Temporarily stage, 8-55 gallon, containers with waste in the Mix-Tub Drum Process Area and transfer wastes in semisolid or solid form, i.e., no liquids, in such containers into the Mix-Tub (II) Transfer hazardous wastes to be stabilized, in semi-solid or solid form, i.e., no liquids, being stored in a roll-off container, other container, Transportation Vehicle, including a Vacuum Truck, in the MBSTA into the Mix-Tub; (III) Transfer wastes, after they have been solidified, stabilized, or bulked in the Mix-Tub, into a roll-off container or a Transportation Vehicle; and (IV) Use the Mix-Tub for the collection of rinsate from the decontamination of containers, roll-off containers, or Transportation Vehicles, including Vacuum Trucks, whose waste was emptied into or off-loaded into the Mix-Tub	In Compliance	Did not observe this activity during site visit. Reviewed operational log and records in Win-Web.	MBSTA	
II(A)(5)(a)(vii)	N/A	MBSTA	Except as is provided for in Section II(A)(5)(a)(vi)(IV) of this Permit, the Permittee shall not stabilize, solidify, bulk, or place any liquids in the Mix-Tub and shall ensure that all of the waste to be stabilized, solidified, or bulked under this provision is in a solid or semi-solid physical state.	In Compliance	Did not observe any liquids in the Mix-Tub during operation.	Mix-Tub	
II(A)(5)(b)	N/A	MBSTA	Permitted Capacity (i) The Permittee shall ensure that at no time is there more than 27 cubic yards of waste, stabilization agent or solidification agent in the Mix-Tub. In addition, the Permittee shall ensure that the daily maximum through-put for the Mix-Tub, five-hundred forty (540) cubic yards per day, is not exceed permitted amount. (ii) Excluding the Mix-Tub, the Permittee shall ensure that at no time does the total volume of waste or other material in the MBSTA exceed permitted amounts: (I) Four hundred sixty (460) cubic yards for roll-off containers or Transportation Vehicles only if there are no Vacuum Trucks in the MBSTA; (II) Four hundred twenty (420) cubic yards for roll-off containers or Transportation Vehicles if either: (A) There is one Vacuum Truck in the MBSTA; or (B) The Mix-Tub is in use; (III) Three hundred eighty (380) cubic yards for roll-off containers or Transportation Vehicles if: (A) There is one Vacuum Truck in the MBSTA, and the Mix-Tub is in use; or (B) There are two Vacuum Trucks in the MBSTA, and the Mix-Tub is not in use; (IV) Three hundred forty (340) cubic yards for roll-off containers or Transportation Vehicles if: (A) There are two Vacuum Trucks in the MBSTA, and the Mix-Tub is in use; and (V) 8,000 gallons for Vacuum Trucks.	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts.	Mix-Tub	
II(A)(5)(c)	40 CFR Part 261, Subparts C and D	MBSTA	Permitted Wastes. (i) Storage. Provided it is not otherwise prohibited by the Permit, only the following wastes or other materials are permitted to be stored in the MBSTA: (I) The following hazardous wastes identified by the waste codes in 40 CFR Part 261, Subparts C and D	In Compliance	Observed no prohibited materials within the MBSTA area. Reviewed operational log and records in Win-Web confirmed observation.	MBSTA	

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Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
II(A)(5)(c)(ii)	40 CFR 268.40	MBSTA	Stabilization. Provided it is not otherwise prohibited by this Permit, the Permittee is authorized to stabilize in the Mix-Tub only those hazardous wastes listed in the table in 40 CFR 268.40, entitled "Treatment Standards for Hazardous Wastes" if: (I) The treatment standard for one or more constituents specified in 40 CFR 268.40 is STABL, stabilization, rather than a concentration level; or (II) After the addition of reasonable amounts of stabilization reagents, at least one of the hazardous constituents shall be at or below the value specified in the table in 40 CFR 268.40 for such waste.	In Compliance	Did not observe this activity during site visit. Reviewed operational log and records in Win-Web.		
II(A)(5)(c)(iii, vi)	N/A	MBSTA	Solidification. Provided it is not otherwise prohibited by this Permit, the Permittee is authorized to solidify only the following wastes in the Mix-Tub. Bulking. Provided it is not otherwise prohibited by this Permit, the Permittee is authorized to bulk only the following wastes in the Mix-Tub or in roll-off containers. Transfer. Provided it is not otherwise prohibited by this Permit, only the following wastes or other materials, in liquid form, are permitted to be transferred from the MBSTA.	In Compliance	Did not observe this activity during site visit. Reviewed operational log and records in Win-Web.	MBSTA	
II(A)(5)(d)(i)-(VIII)	40 CFR 264.1086(d); 49 CFR 173.127 (Class 5 Division 5.1); 49 CFR 172.101, 49 CFR 173.132 (Class 6, Division 6.1)	MBSTA	Prohibited Wastes and Other Materials. (i) Mix-Tub, Bulk Storage and Transfer Area. The Permittee shall not bring to, place within, or allow anywhere in the MBSTA, including the Mix- Tub: (I) Any waste or other material not authorized under Section II (A)(5)(a) or II (A)(5)(c) of this Permit; (II) Any waste or other material specified in Section II (B)(1) of this Permit; (III) Any hazardous waste specified in 40 CFR 261.23; (IV) Liquids or waste or other materials that contain liquids This prohibition, however, does not apply to: (A) Rinsate from rinsing containers, or Transportation Vehicles, including Vacuum Trucks, whose waste or other materials has been emptied or off-loaded into the Mix-Tub; (B) Wastes or other materials that are contained in Vacuum Trucks while in storage or awaiting transfer; or (C) 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 roll-off container or Transportation Vehicle;(V) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; (VI) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; (VII) Any hazardous waste with a VO concentration equal to or greater than 500 parts per million by weight, except for hazardous waste in a roll-off container that has a cover that complies with 40 CFR 264.1086(c)(ii) and the Permittee ensures that any such waste remains in the roll-off container and that the afore-mentioned cover remains on the roll-off container at all times when such waste is at the Facility. (VIII) Waste or other materials containing PCBs. This includes any PCB Item, except for soils contaminated with PCBs that are not prohibited only when stored in roll-off containers.	In Compliance	Observed only Non-RCRA waste in the MBSTA area during the site visit.	MBSTA	

Table A-2- II
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
II(A)(6)(a)	N/A	MPA	<p>Authorized Activities - The Miscellaneous Processing Areas (“MPAs”) at the Facility are the Drum Crusher Area, the Acidic and Alkaline Drum Rinse Stations and the Lab Pack Pour-Off Area. The MPAs are within the Operations Building at the Facility. The Drum Crusher Area, the Acidic and Alkaline Drum Rinse Stations are shown on the WMASP,</p> <p>(i) In the Drum Crusher Area, the Permittee is authorized to crush empty metal containers no greater than fifty-five (55) gallons.</p> <p>(ii) In the Alkaline Drum Rinse Station, the Permittee is authorized to rinse empty containers that formerly contained only alkaline or neutral waste or other material.</p> <p>(iii) In the Acidic Drum Rinse Station, the Permittee is authorized to rinse empty containers that formerly contained acidic waste or other material.</p> <p>(iv) In the Lab Pack Pour-Off Area, the Permittee is authorized to pour waste or other materials from lab packs only into a sink so that the waste or other material enter the On-Site Wastewater Treatment Plant.</p>	In Compliance	<p>Did not observe any containers in drum crusher at time of site visit, capacity is listed as 55 gallons or less on machine. Signage for the drum crusher was observed.</p> <p>Did not observe drum rinsing during site visit. Separate stations are present and labeled for the specific materials present.</p> <p>Did not observe drum rinsing stations. Observed Tank 29, Hazardous Waste Metal Bearing Liquids, 1000-gallon tank, the wastewater treatment system control and monitoring panel as well as several hoses and storage for pumps utilized in the wastewater treatment area. Signage for the drum rinsing stations was not observed.</p> <p>Did not observe any activity in the Lab Pack Pour-Off Area at time of site visit. Signage for the Lab Pack Pour-Off Area was observed</p>	MPA	CH-15/16/17
II(A)(6)(c)	N/A	MPA	<p>Permitted Capacity.</p> <p>(i) The Permittee shall ensure that there are no more than four (4) liters (liquid) in glass containers and twenty (20) liters (liquid) in metal or plastic containers or 14.25 kilograms (solids) of waste or other materials in the Lab Pack Pour-Off Area at any one time. The limits are per 49 CFR 173.12(b)(2), Combination packaging requirements for Lab packs, exception for shipment of waste materials.</p> <p>(ii) The Permittee shall ensure that there is no waste or other materials in the Drum Crusher Area, Acidic Drum Rinse Station or Alkaline Drum Rinse Station, except for containers to be crushed or rinsed, as applicable and any waste generated by the operation of such Rinse Station or Drum Crusher.</p>	In Compliance	Did not observe any materials in the drum crusher or lab pour off area during the site visit.	MPA	
II(A)(6)(d)	40 CFR Part 261, Subparts C and D	MPA	<p>Permitted Wastes and Other Materials. Provided it is not otherwise prohibited by this Permit, only the following are permitted in Miscellaneous Processing Areas:</p> <p>(i) In the Drum Crusher Area – empty metal containers no greater than fifty-five (55) gallons to be crushed;</p> <p>(ii) In the Acidic Drum Rinse Area – Empty containers that formerly contained acidic waste or other materials;</p> <p>(iii) In the Alkaline Drum Rinse Area – Empty containers that formerly contained alkaline or neutral waste or other materials; and</p> <p>(iv) Lab Pack Pour-Off Area – In Lab Pack containers only:</p> <p>(I) The following hazardous wastes identified by the waste codes in 40 CFR Part 261, Subparts C and D</p>	In Compliance	Observed no containers in these permitted areas.	MPA	
II(A)(6)(e)	40 CFR 264.1086(d); 49 CFR 173.127 (Class 5 Division 5.1); 49 CFR 172.101, 49 CFR 173.132 (Class 6, Division 6.1)	MPA	<p>Prohibited Wastes and Other Materials – Specific.</p> <p>(i) The Miscellaneous Processing Areas. The Permittee shall not bring to, place within, or allow anywhere in an MPA:</p> <p>(I) Any waste or other material not authorized under Section II(A)(6)(d) of this Permit; and</p> <p>(II) Any waste or other material specified in Section II(B)(1) of this Permit.</p> <p>(ii) The Lab Pack Pour-Off Area. In addition to Section II(A)(6)(e)(i) of this Permit, the Permittee shall not bring to, place within, or allow anywhere in the Lab Pack Pour-Off Area:</p> <p>(I) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for oxidizers in lab packs containers; and</p> <p>(II) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for waste or other materials in Lab Packs 1 liter or less for liquids or 2.85 kilograms or less for solids.</p>	In Compliance	Observed no prohibited materials within the MPA area. Reviewed operational log and records in Win-Web confirmed observation.	MPA	

Table A-2- II
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
II(A)(7)(a)	N/A	TTTA Activities	Authorized Activity. (i) The Truck-to-Truck Transfer Area ("TTTA") comprises of five (5) truck bays, each 56 feet long by 12 feet wide and a raised concrete Loading/Unloading Dock, 13 feet wide by 73.6 feet long. (ii) In the TTTA the Permittee is authorized to: (I) Load containers of waste from the Facility into Transportation Vehicles for off-site shipment; (II) Unload containers of waste or other materials from Transportation Vehicles for receipt at the Facility; (III) Transfer containers of waste from one Transportation Vehicle to another Transportation Vehicle; and (IV) Temporarily stage containers of waste or other materials on the Loading Dock, for no more than twelve (12) consecutive hours, while performing the activities authorized under sections II(A)(7)(a)(ii)(I)-(III), inclusive, of this Permit.	In Compliance	Observed 4 trailers in various points of being loaded or unloaded. However transfers were not observed during site walk.	TTTA	CH-05
II(A)(7)(b)	N/A	TTTA	(i) The Permittee shall ensure that no waste or other materials remains in the TTTA for a total of more than seventy-two (72) consecutive hours. (ii) The Permittee shall ensure that no waste or other materials remains on the Loading Dock within the TTTA for more than twelve (12) consecutive hours. This includes waste or other materials offloaded from a Transportation Vehicle or waste brought to the Loading Dock from a Container Storage Area or Area to Stage Containers	In Compliance	Did not observe any waste over permitted storage time. Reviewed operational log and records in Win-Web confirmed observation.	TTTA	
II(A)(7)(c)	N/A	TTTA	The Permittee shall ensure that no waste or other materials is placed or stored in the Truck Bay except for containers on a Transportation Vehicle. The Permittee shall also ensure that at no time is there more than one Transportation Vehicle in any Truck Bay and no more than five (5) Transportation Vehicles at all of the Truck Bays combined.	In Compliance	Observed no waste was being stored during site visit not within a transportation vehicle.	TTTA	
II(A)(7)(e)	N/A	TTTA	Permitted Capacity. The Permittee shall ensure that at no time does the total volume of waste or other materials exceed permitted amounts the following: (i) On the Loading Dock Area - 5,060 gallons; (ii) In any single Truck Bay - 5,060 gallons; and (iii) In all of the Truck Bays combined - 25,300 gallons. For purposes of determining compliance with the permitted capacity of the Loading Dock and Truck Bays at the TTTA, each container on the Loading Dock or in a Truck Bay shall be assumed to be full.	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts.	TTTA	
II(A)(7)(f)	N/A	TTTA	Permitted Wastes and Other Materials. Provided it is not otherwise prohibited by this Permit, only the following wastes or other materials are permitted in the Truck-to-Truck Transfer Area: (i) The following hazardous wastes identified by the waste codes in 40 CFR Part 261, Subparts C and D:	In Compliance	Observed no prohibited materials within the TTTA area. Reviewed operational log and records in Win-Web confirmed observation.	TTTA	
II(A)(7)(g)	49 CFR 173.127 (Class 5 Division 5.1), 49 CFR 172.101 table, 49 CFR 173.132 (Class 6, Division 6.1), 40 CFR 273.3(a)	TTTA	Prohibited Wastes and Other Materials. The Permittee shall not bring to, place within, or allow in the Truck-to-Truck Transfer Area: (i) Any waste or other material not authorized under Section II (A) (7)(h) of this Permit; (ii) Any waste or other material specified in Section II (B) (1) of this Permit; (iii) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; (iv) Poisonous Materials identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table, except for: (I) Waste or other materials in Lab Packs 1 liter or less for liquids or 2.85 kilograms or less for solids; and (II) Pesticides covered under 40 CFR 273.3(a);	In Compliance	Observed no prohibited materials within the TTTA area. Reviewed operational log and records in Win-Web confirmed observation.	TTTA	
II(A)(8)(a)	N/A	TPA	(i)TPA consists of four (4) adjacent concrete bays (referred to TPA Area #1), and one concrete bay (referred to as TPA Area #3) 56 feet in length and 12 feet wide. (ii) In the TPA the Permittee is authorized to temporarily store for up to, but no more than, 240 hours: (I) Waste or other materials in containers that remain on a Transportation Vehicle; or (II) Waste or other materials in solid or semi-solid form only, (i.e., no liquids) in roll-off containers no greater than 40 cubic yards. (iii) Unless the integrity of a container or roll-off container is compromised, the Permittee shall not remove, add, handle, or manage any waste or other material in the TPA.	In Compliance	Observed 1 roll-off container and 3 trailers, verified no waste over permitted time via Win-Web.	TPA	
II(A)(8)(b)	N/A	TPA	The Permittee shall ensure that no waste or other materials remains in the TPA for a total of more than two-hundred and forty (240) consecutive hours.	In Compliance	Observed current waste stored was less than 240 hours. Reviewed operation log and records in Win-Web.	TPA	

Table A-2- II
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
II(A)(8)(d)	N/A	TPA	Permitted Capacity. The Permittee shall ensure that at no time does the total volume of waste or other materials in any Truck Bay at the TPA exceed permitted amounts 5,060 gallons for waste on Transportation Vehicles or 40 cubic yards for waste in roll-off container(s). For purposes of determining compliance with the Permitted Capacity of the TPA, each container or roll-off shall be assumed to be full.	In Compliance	Observed during site visit that total volume of waste or other materials did not exceed permitted amounts.	TPA	
II(A)(8)(e)	40 CFR Part 261, Subparts C and D	TPA	Permitted Wastes and Other Materials. Provided it is not otherwise prohibited by this Permit, only the following wastes or other materials are permitted in the Truck Parking Area: (i) The following hazardous wastes identified by the waste codes in 40 CFR Part 261, Subparts C and D	In Compliance	Observed no prohibited materials within the TPA area. Reviewed operational log and records in Win-Web confirmed observation.	TPA	
II(A)(8)(f)	49 CFR 173.115(b), 49 CFR 173.120 (Class 3), 49 CFR 172.101 table, 49 CFR 173.127 (Class 5 Division 5.1), 49 CFR 173.132 (Class 6, Division 6.1)	TPA	Prohibited Waste or Other Materials. The Permittee shall not bring to, place within, or allow in the TPA: (i) Any waste or other material not authorized under Section II(A)(8)(e) of this Permit; (ii) Any waste or other material specified in Section II(B)(1) of this Permit; (iii) All materials identified in 49 CFR 173.115(b), except for materials in aerosol cans 32 ounces or less; (iv) Flammable Liquids identified in 49 CFR 173.120 (Class 3) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; (v) Flammable Solids identified in 49 CFR 173.124(a) (Class 4, Division 4.1) assigned Packaging Group I in column 5 of the 49 CFR 172.101 table; (vi) Oxidizers identified in 49 CFR 173.127 (Class 5 Division 5.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; (vii) Poisonous Material identified in 49 CFR 173.132 (Class 6, Division 6.1) assigned Packing Group I in column 5 of the 49 CFR 172.101 table; (viii) Ammonium nitrate fertilizers; (ix) Sulfur, except for sulfur in a lab pack; and (x) Liquids, or waste or other materials that contain liquids, in roll-off containers. This prohibition, however, does not apply to 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 or Transportation Vehicle.	In Compliance	Observed no prohibited materials within the TPA area. Reviewed operational log and records in Win-Web confirmed observation.	TPA	

Table A-2- II
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Regulatory Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
II(B)(1)	See Requirement Summary	TPA	<p>General Prohibitions. The Permittee shall not allow any of the following wastes or other materials to be brought to, processed, stored, staged, or managed anywhere within the Facility, including all Waste Management Areas:</p> <p>(a) Explosives identified in 49 CFR 173.50 (Class 1) and Forbidden Explosives identified in 49 CFR 173.54;</p> <p>(b) All materials identified in 49 CFR 173.115 (Class 2, Divisions 2.1, 2.2 and 2.3), except for:</p> <p>(i) Materials identified in 49 CFR 173.115(a), (d), (e), and (f) in aerosol cans 32 ounces or less;</p> <p>(ii) Refrigerant gas or dispersant gas, identified in 49 CFR 173.115(j), that is</p> <p>(I) In aerosol cans 32 ounces or less; or</p> <p>(II) Is removed from scrap metal appliances brought to the Facility; and</p> <p>(iii) Materials identified in 49 CFR 173.115(b);</p> <p>(c) Materials identified in 49 CFR 173.21, Forbidden Materials and Packages;</p> <p>(d) "Material poisonous by inhalation or Material toxic by inhalation" as defined in 49 CFR 171.8;</p> <p>(e) Biomedical waste in a putrescent state or any substance that is required by any federal, state, or other governmental entity, including through guidelines, to be maintained at a specified temperature (i.e., requires temperature control) or pressure;</p> <p>(f) Any hazardous wastes with a health hazard rating of 4, as defined in NFPA 704, Degree of Hazard Criteria, most recent edition;</p> <p>(g) Reactive hazardous wastes specified in 40 CFR 261.23(a)(1), 261.23(a)(3), 261.23(a)(7), and 261.23(a)(8);</p> <p>(h) Shock sensitive materials, defined as materials that are readily capable of detonation or explosive decomposition or reaction at normal temperatures and pressures, and materials sensitive to mechanical or localized thermal shock at normal temperatures and pressures, including materials designated by the NFPA 704 as having a reactivity hazard rating of 4;</p> <p>(i) Spontaneously Combustible Materials identified in 49 CFR 173.124(b) (Class 4, Division 4.2), except for lab pack containers assigned Packaging Group II or III in column 5 of the 49 CFR 172.101 table;</p> <p>(j) Dangerous when wet materials identified in 49 CFR 173.124(c) (Class 4, Division 4.3), except for lab pack containers assigned Packaging Group II or III in column 5 of the 49 CFR 172.101 table;</p> <p>(k) Gaseous oxidizers, as defined in NFPA 55;</p> <p>(l) Radioactive materials defined in 49 CFR 173.403 (DOT Class 7);</p> <p>(m) Reactive hazardous waste specified in 40 CFR 261.23(a)(6) if hydrogen peroxide constitutes greater than sixty (60) per cent of such waste; and</p> <p>(n) Prohibited Materials identified in 49 CFR 173.12(b)(3).</p>	In Compliance	Observed no prohibited materials within the TPA area. Reviewed operational log and records in Win-Web confirmed observation.	TPA	

Acronyms and Abbreviations	
ASC	Area to Stage Containers
BULA	Bulk Unloading and Loading Area
CSA	Container Storage Area
MBSTA	Mix-tub, Bulk Storage and Transfer Area
MPA	Miscellaneous Processing Areas
PTP	Personnel Training Plan
TPA	Truck Parking Areas 1 and 3 : For Up to 10-Days or Less
TTTA	Truck-to-Truck Transfer Area, Including Loading/Unloading Dock (Containers)
WAP	Waste Analysis Plan
WMA	Waste Management Area

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
Section III - Operating Conditions							
III(A)(1)	Not Applicable (N/A)	General	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); (b) Ensure that all waste or other materials in the WMAs is secure and remains inaccessible to unauthorized persons; and (c) Prevent unknowing entry or entry by unauthorized persons at the Facility; and (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 (ii) Can authorize response actions in the event of a release or emergency condition at the Facility.	In Compliance	a) Observed procedures and process in place to prevent, monitors and electrical grounding. b) Observed fencing in good condition. c) Observed that to access facility, there is passcode, or drivers must enter lobby or use window to check in. d) Kathryn Bailly - General Manager	Site Wide	CH-01, CH-15
III(A)(2)	N/A	General	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 WMA; and (b) Access to PPE and SDS's for all materials employees may encounter.	In Compliance	Observed ventilation and fans to provide cooling for employees. SDS are present in main office and PPE is accessible as needed.	Site Wide	
III(A)(3)	N/A	General	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.	In Compliance	Observed no materials stored or moved on bare soils.	Site Wide	
III(A)(4)	N/A	General	The Permittee shall transport containers of waste at the Facility using forklifts, hand trucks and/or other equipment capable of transporting such containers.	In Compliance	Did not observe material movement at time of site visit. Did observe drum dollies, forklifts with drum movers throughout the facility.	Site Wide	
III(A)(5)	N/A	General	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 WMA 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.	In Compliance	Did not observe waste movement during site visit.	Site Wide	
III(A)(6)	N/A	General	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; (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; (c) After being brought to or placed in a Truck Parking Area, the waste shall not be brought back to or placed in any WMA at the Facility; and (d) Once brought to the Truck Parking Area, the waste remains subject to all the requirements regarding waste in the Truck Parking Area.	In Compliance	Did not observe this activity during site visit. Reviewed operation log and site records in Win-Web.	Site Wide	
III(A)(7)	N/A	General	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.	In Compliance	Observed indoor storage with heating and ventilation and the use of DOT approved containers.	Site Wide	CH-06
III(A)(8)	RCSA Section 22a-449(c)-11 and RCSA Section 22a-449(c)-103	General	The Permittee shall ensure that all transporters that enter the facility comply with RCSA Section 22a-449(c)-11 and RCSA Section 22a-449(c)-103 with respect to the transportation of hazardous wastes.	In Compliance	Reviewed operational log and records in Win-Web.	Site Wide	
III(A)(10)	N/A	Training	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).	In Compliance	Safety equipment and emergency response equipment observed in good working order. Fire extinguishers are inspected annually and in good conditions, SCBA rectified on schedule.	Site Wide	
III(A)(11)	N/A	Training	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.	In Compliance	Reviewed training plan, and Oracle.	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(A)(12-13)	40 CFR Part 173	Container Conditions	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 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. E20 This does not include dried paint or similar material and dirt/dust.	In Compliance	Observed all containers in good condition during site walk.	Site Wide	CH-08
III(A)(14)	N/A	Container Conditions	The Permittee shall ensure that each container or roll-off container with waste or other materials at the Facility is DOT certified and 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.	In Compliance	Observed all containers to be DOT certified containers.	Site Wide	CH-08
III(A)(15)	N/A	Spills	The Permittee shall operate the Facility in a manner that minimizes the possibility of spills or releases of waste or other materials.	In Compliance	Observed ample spill kits and materials, good housekeeping procedures followed, aisles clear.	Site Wide	CH-02, CH-03
III(A)(16)	N/A	Spills	The Permittee shall remove all spilled or leaked waste or any liquids, including, but not limited to precipitation, that accumulates in any WMA or containment area, including any secondary containment area. The Permittee shall remove such waste or liquid immediately upon detection, but in no event 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 WMA.	In Compliance	Did not observe any spilled materials during site visit. Reviewed operational log and Win-Web Records.	Site Wide	
III(A)(17)	40 CFR 262.11	Spills	The Permittee shall manage all spilled or leaked waste or any liquid, including, but not limited to, precipitation removed from a WMA 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.	In Compliance	Did not observe any spilled materials during site visit. Reviewed operational log and Win-Web Records.	Site Wide	
III(A)(18)	22a-450 of the CGS and 40 CFR Part 302	Spills	(a) The Permittee shall immediately notify the Commissioner using CT DEEP's Emergency Response & Spill Prevention Division (ERSPD) 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") of: (i)Any partial shutdown of the Facility that substantially disrupts normal operations for more than twenty-four hours; (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.	In Compliance	Reviewed previous three years of spill data from facility. Confirmed proper notification to DEEP.	Site Wide	
III(A)(19)	N/A	Spills	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 to the Director of WEED	In Compliance	Reviewed previous three years of spill data from facility. Confirmed proper notification to DEEP.	Site Wide	
III(A)(20)	N/A	Inspections	The Permittee shall inspect the Facility, each WMA 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.	In Compliance	Safety equipment and emergency response equipment observed in good working order. Fire extinguishers are inspected annually and in good conditions, SCBA rectified on schedule.	Site Wide	
III(A)(21)	N/A	Inspections	The Permittee shall record inspections of each WMA 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.	In Compliance	Logs are completed electronic - If electronic log is not available the inspection is completed on paper and retained.	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(A)(22-23)	RCSA Section 22a-174-18(b)(3).	Traffic Control	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. 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).	In Compliance	Trucks were not observed creating excessive traffic and are able to pull off public street to check in prior to entering secured area. No signs were observed during the site walk. Follow-up email communication on 9/13/23 from the Facility shows "No Idling" signage installed as required.	Entry Gate	CH-01, CH-15
III(A)(24)	N/A	Signage	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.	In Compliance	Observed at multiple locations around facility on fence and entrances.	Facility Perimeter	
III(A)(25)	N/A	Secondary Containment	The Permittee shall ensure that: (a) Each WMA has a secondary containment system. (b) The following secondary containment systems are capable of containing the amounts within Table II-1	In Compliance	Observed a secondary containment system in good condition at each WMA.	Site Wide	
III(A)(26, 27, 28)	N/A	Secondary Containment	Suitable Strength of the Secondary Containment system to prevent failure. All containers are wholly within the secondary containment. Upon closure of any WMA process follows closure plan.	In Compliance	Observed all materials within secondary containment.	Site Wide	
III(A)(29)	N/A	Base and Berms	The Permittee shall ensure that the base and berm of the secondary containment in each WMA is free of cracks or gaps and is sealed with a chemical resistant, impermeable coating compatible with all waste or other material.	In Compliance	Observed curbing, sealant in good condition.	Site Wide	
III(A)(30)	N/A	Base and Berms	Whenever the integrity of a WMA's base, berm or coating specified in Section III (A) (29) of this Permit is impaired or in need of repair or re-application, review procedures (a)Remove all waste and other materials from the WMA 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 WMA 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.	In Compliance	Reviewed operational log and documentation tracked in Win - Web. A Work order is generated in Win-Web if needed for repairs or re-application,. A signature is required to close out a work order.	Site Wide	
III(A)(31)	N/A	Base and Berms	The Permittee shall not use or place waste or other materials in a WMA, or any portion thereof, in which the integrity of the secondary containment is impaired or under repair.	In Compliance	Observed all secondary containment in good condition.	Site Wide	
III(A)(32)	N/A	Base and Berms	When the integrity of the secondary containment system of a WMA 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 WMA requiring repair or coating reapplication; (b)The type and degree of repair or coating reapplication needed; (c)The method(s) of repair or reapplication; (d)The date the need for the repair or coating reapplication was noticed; (e)The date(s) all repair(s) were made or coating(s) reapplied; and (f)The name, title and identity of the person who determined that the repair or coating reapplication was sufficient to allow the WMA 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.	In Compliance	Reviewed operational log and documentation tracked in Win - Web. A Work order is generated in Win-Web if needed for repairs or re-application,. A signature is required to close out a work order.	Site Wide	
III(A)(33)	N/A	Base and Berms	Before resuming use of a WMA 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 WMA to ensure the integrity of the coating	In Compliance	Observed no cracking or gaps during site visit.	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(A)(34)	N/A	Prohibited Wastes	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.	In Compliance	Reviewed procedure and operational log, in advance of waste arrival it is tracked in Win-Web Profiling System. If a new profile is to come to Facility - GM reviews to ensure Facility can accept waste. Multiple parties review to ensure facility can accept waste. Confirmation testing is in the lab to match profile.	Site Wide	
III(A)(35)	N/A	Prohibited Wastes	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.	In Compliance	Reviewed procedure and operational log, in advance of waste arrival it is tracked in Win-Web Profiling System. If a new profile is to come to Facility - GM reviews to ensure Facility can accept waste. Multiple parties review to ensure facility can accept waste. Confirmation testing is in the lab to match profile.	Site Wide	
III(A)(36)	N/A	Prohibited Wastes	(a)When waste or other materials first arrives at the entry gate to the Facility the Permittee shall; (i) Review Manifests (ii) Retain date and time the waste or other material arrived at the facility.	In Compliance	Reviewed operational log and Win-Web records. When waste is received, tracking sticker is applied and scanned. Data is entered into Win-Web. Facility personal QC this process are trained to review to insure that the waste is in compliance. Date is retained in scanned sticker and stored in facility log.	Site Wide	
III(A)(37)	N/A	Prohibited Wastes	(a) If a container of waste or other materials, not apparent on the manifest or shipping paper, 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. (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. (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 (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. (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.	In Compliance	Did not observe not apparent waste during site visit. Reviewed operational log and procedures. If not apparent waste is received, the Facility, contacts generator. If waste is labeled and profiled Facility would do an off-c to manifest. If not apparent waste is received it is put in separate location that can store the material if known. If unknown it stays on the transport vehicle. Records are retained in the operating log, discrepancy report, and or rejected back to the generator.	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(A)(38)	40 CFR Part 264, Appendix V	Prohibited Wastes	Immediately after the Permittee determines or reasonably should have determined that such waste or other material is prohibited from the Facility or from a WMA 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 (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 (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.	In Compliance	Did not observe not apparent waste during site visit. Reviewed operational log and procedures. If not apparent waste is received, the Facility, contacts generator. If waste is labeled and profiled Facility would do an off-c to manifest. If not apparent waste is received it is put in separate location that can store the material if known. If unknown it stays on the transport vehicle and is rejected to alternate facility that can accept that waste. Records are retained in the operating log, discrepancy report, and or rejected back to the generator.	Site Wide	
III(A)(39)	N/A	Termination of Manifest	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.	In Compliance	Reviewed documentation in Win-Web and observed correct Designated Facility for waste to be terminated at Facility. Reviewed selection of manifests for previous year.	Site Wide	
III(A)(40)	N/A	Waste Tracking	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: (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; (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 (c) A record of the date and time that each waste or other material was placed into a WMA, moved from one WMA to another WMA and was taken off-site or removed from the Facility.	In Compliance	Maintained electronically, scanned into Win-Web, available for review. Tracking for all waste is stored in Win-Web. Scanned via tracking stickers and reported in Win-Web.	Site Wide	
III(A)(41)	N/A	Waste Tracking	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.	In Compliance	Reviewed procedures. Compatibility is conducted in Win-Web, and by visual review prior to placing. Observed signs above each area that specify wastes permitted in each area.	Site Wide	CH-06
III(A)(42)	N/A	Waste Tracking	Before moving or transferring any waste or other material to or from a Waste Management Area to another Waste Management Area, the Permittee shall: (a) Conduct a hazardous waste characterization and verification in accordance with the WAP presented as Attachment A to this Permit, if required; and (b) Verify compliance with Section III (A) (41) of this Permit.	In Compliance	Reviewed procedures. Compatibility is conducted in Win-Web, and by visual review prior to placing. Observed signs above each area that specify wastes permitted in each area.	Site Wide	
III(A)(43)	N/A	Waste Tracking	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.	In Compliance	Reviewed manifests and shipping papers on Win-Web. Observed all manifests and shipping papers are available upon request. Facility Coordinator Monitors these requirements, TTA personnel will also verify.	Site Wide	
III(A)(44)	N/A	Audits	(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. (b) Conduct Audits in the 3rd quarter of each year. (c) No later than 30 calendar days after audit, the permitted shall take prompt action to address any problems. (d) Within 45 calendar days after audit, the permittee shall submit a written report of the results of the audit.	In Compliance	Customer Resources, Regulatory Information. https://www.cleanharbors.com/contact-us/customer-resources	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(A)(46)	N/A	Decontamination Waste	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.	In Compliance	Decontamination was not taking place during site visit, however documentation was reviewed in Win-Web.	Site Wide	
III(A)(47)	40 CFR 264.176	Ignitable & Reactive Waste	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.	In Compliance	No waste observed within 50 ft of the facilities property line.	Site Wide	
III(A)(48)	N/A	Ignitable & Reactive Waste	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	In Compliance	Observed Flame Cabinets, grounded and bonded to facility.	Site Wide	CH-11
III(A)(49)	N/A	Ignitable & Reactive Waste	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.	In Compliance	Observed designated area outside of fence line. Observed No Smoking Signs located throughout the Facility.	Site Wide	CH-09, CH-11
III(A)(50)	N/A	Ignitable & Reactive Waste	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.	In Compliance	Observed grounding and bonding materials present. Flame Cabinet is bonded, did not observed any materials being processed during site visit.	Site Wide	CH-11
III(A)(52-54)	40 CFR Part 268, subpart C/D, 40 CFR 268.7, 40 CFR 264.73 and 268.7	Land Disposal	(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). (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. (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.	In Compliance	Did not observe this activity during site visit. Reviewed operational log and Win-Web records.	Site Wide	
III(A)(55)	Appendix I of 40 CFR Part 268	Land Disposal	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. (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. (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.	In Compliance	Reviewed operational log and Win-Web records.	Site Wide	
III(B)(1-2)	N/A	Specific Conditions Applicable to Containers	(1) At all times, the Permittee shall maintain aisle space, at a minimum, of 24 inches. 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: (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 (ii) The Mix-Tub, Bulk Storage and Transfer Area.	In Compliance	Observed aisles are painted on floors, specific areas to store wastes are painted and labeled, stacked materials were observed in compliance.	Site Wide	CH-02, CH-06
III(B)(3)	N/A	Specific Conditions Applicable to Containers	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.	In Compliance	Observed containers of hazardous waste labeled and marked clearly.	Site Wide	

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Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(B)(4)	40 CFR Part 264, Appendix V.	Specific Conditions Applicable to Containers	(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. (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. For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264, Appendix V.	In Compliance	Observed no incompatible materials during site visit. Reviewed documentation listed on Win-Web. Observed wastes permitted are labeled on area signage. All materials stored in secondary containment where required.		
III(B)(5)	N/A	Specific Conditions Applicable to Containers	(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; (ii) The container is tightly closed; (iii) Any applicable requirements of the WAP, presented herein as Attachment A to this Permit have been complied with and recorded in the Operating Record for the Facility. (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 (v) A bar code, or similar tracking device, has been placed on the container such that at all times the Permittee can identify: (I) The contents of the container; (II) When a container was placed in a such area; and (III) All of the containers placed in any such area.	In Compliance	Observed tarps present, closed and covered, containers labeled and in good condition during site visit. Bar codes and tracking numbers are present on containers. Dates and times are stored electronically via scanned label in Win-Web.	Site Wide	CH-08
III(B)(5)(b)	N/A	Specific Conditions Applicable to Containers	(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.	In Compliance	Did not observe any conditions listed in Permit Section III(B)(5)(a) during site visit. Reviewed operational log and records in Win-Web to confirm observation.	Site Wide	
III(B)(6)	N/A	Specific Conditions Applicable to Containers	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 (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.	In Compliance	Did not observe this activity during site visit, reviewed site inspections and records in Win-Web.	Site Wide	
III(C)(1-2)	N/A	Paint care Program	(1) Paint Care 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. (2) The Permittee shall ensure that Paint Care Program Waste is off-loaded from a Transportation Vehicle onto the Loading Dock in the Truck-to-Truck Transfer Area.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(C)(3)	N/A	Paint care Program	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 (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. (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.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Dock	
III(C)(4)	N/A	Paint care Program	The Permittee shall ensure that all Paint Care 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 (b) Staging Area M-2 for sorting, and if necessary, sampling pursuant to Section III(C) (6) (b) of this Permit.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Dock, Staging Areas	
III(C)(5)	N/A	Paint care Program	(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. (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. (c) When sorting Paint Care 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.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Dock, Staging Areas	
III(C)(6)	40 CFR 261.4(b)	Paint care Program	When sorting Paint Care 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); (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.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	
III(C)(7)	N/A	Paint care Program	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; (b) Remains legible to emergency personnel; and (c) Indicates the date that an Inner Container was first placed in such Outer Container.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	
III(C)(9-10)	N/A	Paint care Program	(9) Unless Section III(C)(6)(d) applies, the Permittee shall ensure that no later than five (5) days after Paint Care 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 (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. (10) The Permittee shall ensure that no Latex Waste Paint or Non-Latex Waste Paint remains at the Facility more than one year.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	
III(C)(11)	40 CR 262.11	Paint care Program	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.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	
III(C)(13)	N/A	Paint care Program	The Permittee shall maintain all Paint Care 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.	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(1)(a)(i)	N/A	CSA and ASC	All containers holding wastes or other materials are handled or stored in a manner that prevents leakage or spillage from such containers	In Compliance	Did not observe this waste on site during site visit, records reviewed. Household waste program operates April through November. Facility repackages for the program, goes to GBD International for Disposal.	Site Wide	
III(D)(1)(a)(iii)	N/A	CSA and ASC	Daily Inspections of Areas Daily and recorded.	In Compliance	Reviewed site documentation and inspection records in Win-Web, confirmed observation.	Site Wide	
III(D)(1)(a)(iv-vi)	40 CFR 264.175	CSA and ASC	(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 (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 (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.	In Compliance	Observed containment systems at each CSA, DOT containers, forklifts and drum carts throughout site.	CSA and ASC	CH-07
III(D)(1)(b)(i)	N/A	CSA and ASC	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.	In Compliance	Observed signs in good condition and visible, paint on floor to demarcate areas where applicable.	CSA and ASC	CH-06, CH-09, CH-10, CH-
III(D)(1)(b)(ii)	N/A	CSA and ASC	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: (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 redesignated 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.	In Compliance	Verified via procedure and operational log and records in Win-Web.	CSA and ASC	
III(D)(1)(b)(iii)	40 CFR 246.17(b)(1)-(5), 40 CFR 264, Appendix V	CSA and ASC	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.	In Compliance	Verified via procedure and operational log and records in Win-Web.	CSA and ASC	
III(D)(1)(b)(iv)	40 CFR Part 268.50(d) and (e)	CSA and ASC	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 Compliance	Did not observe restricted land disposal waste. Any F listed wastes are being treated at termination facility.	CSA and ASC	
III(D)(1)(c)	N/A	CSA and ASC "Paint Care"	(i) The Permittee shall ensure that Area M2 is equipped with appropriate emergency response equipment; and (ii) In addition to all hazardous waste training, the Permittee shall ensure that all Facility personnel handling Paint Care Program Waste are trained in all of the requirements of this Permit, The Permittee shall maintain training plans and records of the training provided to comply with this provision in the Operating Record for the Facility.	In Compliance	Observed appropriate equipment in Area M2 and reviewed training records in Oracle.	M2	CH-09
III(D)(1)(d)(i)	N/A	CSA and ASC "Lab Pack"	The Permittee shall not accept a lab pack for disassembly that: (I) Has not been pre-approved in accordance with the Facility's WAP and (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.	In Compliance	Did not observe any lab pack containers during the site visit. Reviewed procedures and manifests from these wastes.	CSA and ASC	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(1)(d)(iii)	N/A	CSA and ASC "Lab Pack"	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. (II) Whether the containers within the lab-pack match the containers listed on the packing list for lab pack.	In Compliance	Did not observe any lab pack containers during the site visit. Reviewed operational log and records in Win-Web.	CSA and ASC	
III(D)(1)(d)(iv)	40 CFR Part 264, Appendix V	CSA and ASC "Lab Pack"	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; (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 (III) The Permittee disposes of all waste generated from the consolidation of lab packs in accordance with all applicable requirements.	In Compliance	Did not observe any lab pack containers during the site visit. Reviewed operational log and records in Win-Web.	CSA and ASC	
III(D)(2)(a)(i-iii)	40 CFR Part 264 Appendix V, 40 CFR 264.175	BULA	(i) No incompatible waste or other materials are in the Bulk Unloading and Loading Area at the same time. For purposes of this provision, compatibility shall be determined in accordance with 40 CFR Part 264 Appendix V; (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; (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;	In Compliance	Did not observe any incompatible materials being stored adjacent to each other during the site walk. Reviewed operational log and records in Win-Web to confirm observation.	BULA	
III(D)(2)(a)(iv)	40 CFR Part 264 Appendix V	BULA	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; (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; (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 (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.	In Compliance	Did not observe any waste transfer activities during the site walk. Reviewed operational log and documentation in Win-Web.	BULA	
III(D)(2)(a)(v)	N/A	Tank 11 & 14, "Signage"	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;	In Compliance	Observed signs throughout facility in good condition and visible.	Tank 11 and 14	CH-13, CH-14
III(D)(3)(a)(i-ii)	N/A	Tank 11 & 14	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. (ii) The Permittee shall prevent spills and overflows from Tank Systems 11 and 14 or any containment system associated with these tanks systems.	In Compliance	Did not observe any negative impacts from waste. Reviewed documentation and overflow and spill prevention equipment records in the operation log and records in Win-Web.	Tank 11 and 14	
III(D)(3)(a)(iii)	40 CFR 264.191 and 40 CFR 264.192, 40 CFR 270.11(d)	Tank 11 & 14	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).	In Compliance	Reviewed documentation in Win-Web, and integrity testing reports.	Tank 11 and 14	
III(D)(3)(a)(iv-v)	40 CFR 264.196	Tank 11 & 14	(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. (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).	In Compliance	Observed tanks and area in good condition with intact concrete, no apparent leaks, or defects in system.	Tank 11 and 14	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(3)(a)(vi)	N/A	Tank 11 & 14	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 ; (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; (III) Ensure that Tank Systems 11 or 14 have the capacity to receive the waste to be transferred; and (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.	In Compliance	Observed records that WAP is followed, and no off permit waste present at site. Did not observe any transfers during site visit.	Tank 11 and 14	
III(D)(3)(a)(viii)	40 CFR Part 264, Appendix V	Tank 11 & 14 "Decontamination"	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 (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 (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.	In Compliance	Did not observe any decontamination during site visit. Reviewed documentation in Win-Web.	Tank 11 and 14	
III(D)(3)(a)(xi)	N/A	Tank 11 & 14 "Decontamination"	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.	In Compliance	Reviewed tank certifications, Win-Web records.	Tank 11 and 14	
III(D)(3)(a)(xi)	N/A	Tank 11 & 14 "Inspections"	Permittee shall ensure that inspections of Tank Systems 11 and 14 include a daily evaluation	In Compliance	Reviewed records in Win-Web.	Tank 11 and 14	
III(D)(3)(a)(xii)	40 CFR 264.17(b)	Tank 11 & 14 "Incompatibles"	(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). (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.	In Compliance	Did not observe incompatible waste during site visit. Reviewed records, no indication of incompatible waste was noted.	Tank 11 and 14	
III(D)(3)(a)(xiv-xvii)	N/A	Tank 11 & 14 "Labeling/ Record Keeping"	(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 "Hazardous Waste," and other words that identify the contents of the tank. (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. (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. (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.	In Compliance	Observed all signs in good condition and visible.	Tank 11 and 14	
III(D)(3)(a)(xviii)	40 CFR Part 268.50(d)	Tank 11 & 14 "Land Disposal"	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; (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 (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.	In Compliance	Did not observe during site visit.	Tank 11 and 14	
III(D)(4)(a)(i-ii)	40 CFR 264.175	MBSTA	(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. (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.	In Compliance	Observed areas as clean, with active cleaning taking place during site visit.	MBSTA	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(4)(b)(i)	N/A	MBSTA	(i) Prior to placing any waste or other materials in the Mix-Tub, Bulk Storage and Transfer Area, the Permittee shall: (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. (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: (a) Is properly marked and labeled; (b) Is in good condition and free of impairment or damage; (III) Ensure that the required profile form and manifest or shipping paper has been received at the Facility; and (IV) Is covered in a manner that meets the requirements of Section III (D) (4) (b) (ii) of this Permit;	In Compliance	Did not observe any waste or materials being moved during site visit.	MBSTA	
III(D)(4)(b)(ii-iii)	N/A	MBSTA	(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. (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	In Compliance	Observed each roll off has cover, is labeled, and free of precipitation and free draining liquids.	MBSTA	CH-08
III(D)(4)(b)(iv)	40 CFR Part 268.50(d)	MBSTA	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.	In Compliance	Did not observe materials being restricted from land disposal being stored during the site visit. Confirmed observation via records in Win-Web.	MBSTA	
III(D)(4)(b)(v)	N/A	MBSTA	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.	In Compliance	Did not observe any vacuum trucks in this area during the site visit. Confirmed observation via records in Win-Web.	MBSTA	
III(D)(4)(c)(i-ii)	N/A	MBSTA	(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. (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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	MBSTA	
III(D)(4)(c)(iii-iv)	N/A	MBSTA	(iii) The Permittee shall ensure that if a container brought to the Mix- Tub Drum Process Area that contains liquids or a mixture of 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, (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 (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. (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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	MBSTA	

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Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(4)(c)(v-vi)	N/A	MBSTA	(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 (II) Record and maintain in the Operating Record for the Facility the name of the person who authorized such solidification, stabilization, or bulking. (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. (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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	MBSTA	
III(D)(4)(c)(vii)	N/A	MBSTA	The Permittee shall inspect the Mix-tub for signs of spills and leaks before, during and after each use.	In Compliance	Reviewed records recorded during daily site inspections in Win-Web.	Mix-Tub	
III(D)(4)(c)(viii)	N/A	MBSTA	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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Mix-Tub	
III(D)(4)(c)(ix)	N/A	MBSTA	(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 (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. (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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Mix-Tub	
III(D)(4)(c)(x)	40 CFR Part 264 Appendix V	MBSTA	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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Mix-Tub	
III(D)(4)(c)(xi)	40 CFR Part 268	MBSTA	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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Mix-Tub	
III(D)(4)(c)(xii-xiii)	N/A	MBSTA "Decontamination"	(xii) (I) The Permittee shall decontaminate the Mix-Tub, as well as equipment used in the solidifying, stabilization or bulking process 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. (B) All of the waste has been removed from the Mix- Tub and (1) The waste removed, including any rinsate from decontamination, and the waste to be added to the Mix-Tub thereafter are incompatible, (2) The waste removed contains a listed hazardous waste and the waste to be added to the Mix-Tub thereafter is a nonhazardous waste or is a characteristic hazardous waste. (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, or a roll-off or other containers, or the waste carrying portion of any Transportation Vehicle, including a Vacuum Truck, whose contents have been emptied into the Mix-Tub or transferred.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Mix-Tub	

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Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(4)(c)(xiv-xviii)	N/A	MBSTA "Additional Requirements"	(xiv) Whenever the Permittee is changing the waste to be solidified, stabilized or bulked in the Mix-Tub, the Permittee shall ensure that the Mix-Tub is "broom-clean". (xv) The Permittee shall ensure that the bulking of hazardous waste does not result in such waste being treated by dilution. (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. (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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Mix-Tub	
III(D)(5)(a)(i-iv)	N/A	MPA - Drum Crusher	(i) The Permittee shall ensure that the rinsing and crushing areas are properly maintained in good working order and do not pose a hazard to human health or the environment (ii) When rinsing and crushing containers the Permittee shall ensure that incompatible waste is not mixed; (iii) Other than crushed containers, the Permittee shall collect and containerize all waste generated from rinsing and crushing operations, shall characterize such waste; (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.	In Compliance	Observed in good condition, did not observe mixing of incompatible wastes. No storage observed in these areas.	Drum Crushing Area	
III(D)(5)(b)	N/A	MPA - Rinse Stations	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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Rinse Area	
III(D)(5)(c)	N/A	MPA - Drum Crusher	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 (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 offsite.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Drum Crusher Area	
III(D)(5)(d)(i-iii)	N/A	MPA - 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; (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 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); (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 (III) authorized to be added to the On-Site Wastewater Treatment Plant by the discharge permit issued by the Commissioner.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Pour Off Area	
III(D)(5)(d)(iv)	N/A	MPA - Pour Off Area	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.	In Compliance	Reviewed documentation, personal training plan and Oracle.	Pour Off Area	
III(D)(5)(d)(v)	N/A	MPA - Pour Off Area	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.	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	Pour Off Area	
III(D)(6)(a)(i-ii)	49 CFR 177.848	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), 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	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	TTTA	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(6)(a)(iii)	40 CFR 262.30, 262.31 and 262.32	TTTA	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 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), 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;	In Compliance	Did not observe this activity during site visit, reviewed documentation and procedures in Win-Web.	TTTA	
III(D)(6)(a)(iv)	N/A	TTTA	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 Compliance	No open containers were observed during site visit.	TTTA	
III(D)(6)(a)(v - vi)	N/A	TTTA	(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. (vi) The Permittee shall ensure that at no time is there a single container with more than 350 gallons of liquids in the TTTA.	In Compliance	Observed drum cart and forklift were present and readily accessible, no containers over 350 gallons were present during site walk.	TTTA	CH-07
III(D)(6)(a)(vii)	RCSA 22a-209-15(c), 22a-209-15(d), RCSA 22a-209-15	TTTA	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.	In Compliance	Did not observe any biomedical waste during site visit, Records note that incoming biomedical waste is transferred truck to truck.	TTTA	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(6)(b)(i-ii)	N/A	TTTA	(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 (ii) The Permittee shall ensure that the secondary containment system in the TTTA is: (I) sloped to a sump capable of containing liquids; and (II) capable of preventing the commingling of any wastes, 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.	In Compliance	Observed no tractors were connected during site visit. Observed that truck is disconnected from trailers, wheels are chocked and a stand is placed under king pin. Secondary containment is present and in good condition, curbing was present as required.	TTTA	CH-05
III(D)(7)(a)(i-ii)	49 CFR 177.848	TPA	(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: (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. (ii) The Permittee shall comply with the requirements of 49 CFR 177.848 regarding all waste or other material in the TPA;	In Compliance	Observed Yard truck was present and is good working order.	TTTA	CH-04
III(D)(7)(a)(iii)	N/A	TPA	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 Compliance	Observed all containers in the TPA closed during site visit.	TPA	
III(D)(7)(a)(iv)	N/A	TPA	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;	In Compliance	Observed no containers greater than 549 gallons in the TPA during site visit.	TPA	
III(D)(7)(a)(v)	N/A	TPA	The Permittee shall ensure that the secondary containment system in the TPA is: (I) sloped to a sump capable of containing liquids; and (II) capable of preventing the commingling of any wastes, other materials, or liquids from one Truck Bay into another Truck Bay. 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	In Compliance	Observed berm in good condition at the TPA.	TPA	

**Table A-2-III
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
III(D)(7)(a)(vi-vii)	N/A	TPA	(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 (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.	In Compliance	Observed all containers closed during site visit.	Site Wide	

Acronyms and Abbreviations	
ASC	Area to Stage Containers
BULA	Bulk Unloading and Loading Area
CSA	Container Storage Area
MBSTA	Mix-tub, Bulk Storage and Transfer Area
MPA	Miscellaneous Processing Areas
PTP	Personnel Training Plan
TPA	Truck Parking Areas 1 and 3 : For Up to 10-Days or Less
TTTA	Truck-to-Truck Transfer Area, Including Loading/Unloading Dock (Containers)
WAP	Waste Analysis Plan
WMA	Waste Management Area

**Table A-2-IV
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
Section IV - General Facility Conditions							
IV (C)	Not Applicable (N/A)	WAP	Follow Procedures in WAP; maintain and up to date copy of the WAP at the facility; maintain generator waste profile sheets, copies of all records, documents or other information to show compliance with the WAP; have available at all times for review by WEED or EPA; All hazardous waste characterization and analytical work performed in accordance with EPA SW-846.	In Compliance	Records are available at all times via Win-Web.	Site Wide	
IV(D)	40 CFR 264.14(a)	Security	(1) Pursuant to 40 CFR 264.14(a), the Permittee shall prevent the unknowing and unauthorized entry of persons, livestock, or other animals into the Facility. (2) The Permittee shall ensure that: (a) All entrances to the Facility are locked at all times unless authorized personnel are present; (b) Access to the Facility is limited to the emergency coordinators, security personnel or other authorized personnel who have received training in accordance with this Permit and all other applicable law; and (c) The warning signs bearing the legend, "Danger-Unauthorized Personnel Keep Out" ; "Danger-Authorized Personnel Only"; and/or "Danger – No Trespassing" shall remain posted on the fence surrounding the Facility, at each entrance to the Facility and at other locations in sufficient numbers to be seen from any approach to the Facility's entrance.	In Compliance	Observed fence in good condition, facility entrances are locked at all times and automatically close. Access is limited to operators with codes or have been approved by office personnel. Signage present on fencing and doors to facility.	Facility Perimeter	CH-01, CH-15
IV(D)	N/A	Security	(3) The Permittee shall ensure that the Facility has: (a) A fence in good repair which completely surrounds the Facility and/or the real property on which the Facility is located; and (b) A means to control entry, at all times, through gates or other entrances to the Facility. (4) The Permittee shall maintain all security equipment systems in good repair at all times until Final Closure of the Facility. (5) The Permittee shall maintain any security recording of the facility for at least 12 months or in the event of a noncompliance event at the Facility until the Facility resolves the violations or is In Compliance.	In Compliance	Observed fence in good condition, facility entrances are locked at all times and automatically close. Access is limited to operators with codes or have been approved by office personnel. Signage present on fencing and doors to facility.	Facility Perimeter	CH-01, CH-15
IV(E)	N/A	Inspections	(1) Perform inspections of the Facility in accordance with the Facility Inspection Schedule, incorporated herein as Attachment B of this Permit. The Permittee shall maintain the Inspection Plan, approved by the Commissioner, at the Facility at all times. (2) Inspect the Facility for malfunctions and deteriorations, operator errors, and discharges, which may be causing or may lead to: (a) Releases of hazardous waste constituents to the environment, and (b) A threat to human health or the environment. (3) Remedy any deterioration or malfunction of equipment or structure, which an inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately. (4) Ensure that records of inspections are maintained at the Facility at all times, and contain such information and be on such forms as prescribed by the Facility Inspection Schedule, incorporated herein as Attachment B. The Permittee shall maintain the records pertaining to inspections, remedial actions and repairs resulting from such inspections for at least (3) three years from the date of the inspection.	In Compliance	Reviewed inspection records and available in Win-Web.	Site Wide	
IV(F)	40 CFR 264.16	Training	The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training shall comply with the requirements of 40 CFR 264.16, and include training in the elements outlined in the Personnel Training Plan.	In Compliance	Reviewed Personnel Training Plan.	N/A	

**Table A-2-IV
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
IV(G)	N/A	Ignitable, Reactive or Incompatible	Any waste or other material is separated and protected from all sources of ignition or reaction; All cutting, welding or other operations involving open flames performed within the proximity of any ignitable waste has been approved in advance in writing by the designated safety personnel under the direct supervision of the Facility's Emergency Coordinator or Alternate Emergency Coordinator (designee); No smoking shall be allowed in any Waste Management Area where ignitable or reactive waste or other material is being stored, handled, or otherwise managed. No smoking or open flames occur wherever there is a hazard from ignitable or reactive wastes or other materials. The Permittee shall prominently display and maintain one or more "No Smoking" signs in each such area.	In Compliance	Observed Hot Work permitting process, welding and cutting conducted in designated areas. Process is included in training.	Site Wide	
IV(G)	N/A	Ignitable, Reactive or Incompatible	The Permittee shall ensure that containers holding ignitable or reactive wastes or other materials shall be located at least fifteen (15) meters or fifty (50 feet) from the Facility property line.	In Compliance	No containers were observed within 50 feet of the facility perimeter during site visit.	Site Wide	
IV(H)	N/A	Preparedness and Prevention	Design and Operation of Facility (40 CFR 264.31), Required Equipment (40 CFR 264.32), Testing and Maintenance of Equipment (40 CFR 264.33), Access to Communication or Alarm System (40 CFR 264.34), Required Aisle Space (40 CFR 264.35), Arrangement with Local Authorities (40 CFR 264.37),	In Compliance	Reviewed documentation during site visit.	Site Wide	
IV(G)(1-6)	N/A	Contingency Plan	Plan on Site? Date of Plan? Prepared by? Reports/Summaries of any incidences requiring the implementation of the contingency plan? Plan sent to local authorities? Emergency procedures? Emergency Coordinator(s)? Emergency equipment list and locations? Evacuation Plan?	In Compliance	Reviewed documentation. Plan sent to applicable agencies, plan was on-site updated March 2023, contains all required components.	N/A	
IV(J)	See Requirement Summary	Manifests	Whenever a shipment of hazardous of waste is received at the Facility or initiated from the Facility, the Permittee shall comply with the applicable requirements of Sections of 22a-449(c)-100 through 119 and 22a 449(c)-11 of the RCSA, the requirements of 40 CFR 262, and the applicable sections of 40 CFR 264 Subpart E, regarding hazardous waste manifests.	In Compliance	Reviewed selection of 10 manifests over previous year in Win-Web.	N/A	
IV(K)(1-11)	N/A	Operating Record	The Permittee shall maintain, in writing or in an electronic record that can be easily accessed or reproduced upon request by the Commissioner, the Facility's Operating Record until Final Closure of the Facility	In Compliance	All records available via Win-Web or other method during site visit.	N/A	
IV(L)	22a-449(c)-100 to 119 of the RCSA	Records	(1) The Permittee shall ensure that all records required under Sections 22a-449(c)-100 to 119 of the RCSA, and this Permit, including all plans, are furnished upon request, and made available at all reasonable times for inspection to any officer, employee, or representative of the Department of Energy and Environmental Protection (DEEP) or EPA. (2) The retention period for all records required under Sections 22a-449(c)-100 to 119 of the RCSA and this Permit shall automatically be extended during the course of any unresolved enforcement action regarding the facility until such enforcement action is fully resolved or for any reasonable period of time as may be requested by the Commissioner. Any exemption from this requirement shall require the written approval of the Commissioner.	In Compliance	All records available via Win-Web or other method during site visit.	N/A	
IV(M)	N/A	Biennial Report	BIENNIAL REPORT. The Permittee shall prepare and submit a biennial report to the Commissioner by March 1st of each even numbered year regarding waste activities at the Facility for the previous calendar year on a form prescribed by the Commissioner. In addition, the Permittee shall provide any other information that the Commissioner specifies relating to the activities at the Facility. The Permittee shall comply with all the requirements of 40 CFR 264.75.	In Compliance	Confirmed submission of 2021 Biennial Report - Submitted 02/21/2022.	N/A	

**Table A-2-IV
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
IV(N)	N/A	Closure	Plan on-site? Date of plan? Prepared by? Have any regulated units closed? -If yes, is closure certified by owner/P.E.? -Is closure certification on-file at the DEEP? -Date of closure certification Status of closure plan (approved and date)? - Does plan include all regulated units (compare plan with Part A & on-site operations)? - Does plan include (indicate presence/absence, comment on adequacy): - Estimate of maximum inventory? - Description of how each unit will be closed & methods to be used during closure? - Description of steps needed to remove/decontaminate equipment/structures/soil: - Schedule for closure of each unit & for final closure (time-frames & milestones)? - Closure/Post Closure cost estimates? Estimate of expected year of final closure?	In Compliance	Reviewed components available at during site visit. Costs are being updated in closure plan, currently reference 2011 cost. Working with DEEP currently.	N/A	
IV(O)	N/A	RCRA Corrective Action Requirements	Not Currently Applicable. Applies to Facility Post-Closure and approval of the Closure Plan.	In Compliance	Facility is not in closure, this is not applicable at this time	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	Closure Cost Estimate Estimate on Site? Amount of Estimate? Date of Most Recent Adjustment?	In Compliance	Meet current requirements, being review by state.	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	Financial Assurance Type(s) of Mechanism(s)? Amount of Coverage?	In Compliance	Meet current requirements, being review by state.	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	Post Closure Cost Estimate Estimate on Site? Amount of Estimate? Date of Most Recent Adjustment?	In Compliance	Meet current requirements, being review by state.	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	Financial Assurance - Post Closure Type(s) of Mechanism(s)? Amount of Coverage?	In Compliance	Meet current requirements, being review by state.	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	3rd Party Liability Insurance - Sudden Coverage? Type(s) of Mechanism(s)? Does the financial mechanism provide at least \$1 million coverage per occurrence with an annual aggregate amount of at least \$2 million?	In Compliance	Meet current requirements, being review by state.	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	3rd Party Liability Insurance - Non-Sudden Coverage? Type(s) of Mechanism(s)? Does the financial mechanism provide at least \$3 million coverage per occurrence with an annual aggregate amount of at least \$6 million? 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?	In Compliance	Meet current requirements, being review by state.	N/A	
IV(P)(1-8)	40 CFR 264	Financial Requirements	Financial Assurance - Corrective Action Type(s) of Mechanism(s)? Amount of Coverage?	In Compliance	Meet current requirements, being review by state.	N/A	

**Table A-2-IV
Permit Compliance Audit
Clean Harbors of Connecticut, Inc. / Bristol CT**

Permit Citation	Reference Citation	Keyword	Requirement Summary	Compliance Status	Observations	Location(s) of Observation	Photograph ID (If Applicable)
IV(Q)(C)(6)	264.1083(a) and 265.1084(a)(2) and (3)	Air Emissions Requirements (Subpart CC)	(a) Under this permit, the Permittee must demonstrate by direct measurement or method that before use is approved by the Commissioner that for each container and tank the Permittee claims to be exempt under Subpart CC, the average VO concentration for hazardous waste, determined in accordance with 264.1083(a) and 265.1084(a)(2) and (3), is less than 500 ppmw. (b) For each tank or container, the Permittee must review and update this determination in accordance with 264.1082(c)(1) at least once every 12 months following the date of the initial determination. For each container or tank, the Permittee shall prepare and maintain the records described in 264.1089(f). These records must be maintained as part of the operating record.	In Compliance	Not subject to CC, maintain by not permitting VO content over 500 ppm by weight on site.	N/A	
IV(Q)(D)(6)	N/A	Air Emissions Requirements (Subpart CC)	Tanks 11 and 14. The Permittee is prohibited from placing and shall NOT place any waste or other materials with a VO concentration of 500 parts per million and greater by weight (ppmw) in any tank at the Facility regulated by this Permit.	In Compliance	Not subject to CC, maintain by not permitting VO content over 500 ppm by weight on site.	Tank 11 and 14	
IV(R)	22a-449(c)-113 of the RCSA	Universal Wastes	Universal Wastes storage for less than one year?	In Compliance	Reviewed Universal Waste records in Win-Web. Did not observe any universal waste over 365 days old.	Site Wide	
IV(S)	22a-449(c)-119 of the RCSA.	Used Oil	See Used Oil Addendum	In Compliance	Questionnaire was reviewed with Facility, used oil is not accepted at the facility. Only oily water is processed at the facility.	Site Wide	

Acronyms and Abbreviations	
ASC	Area to Stage Containers
BULA	Bulk Unloading and Loading Area
CSA	Container Storage Area
MBSTA	Mix-tub, Bulk Storage and Transfer Area
MPA	Miscellaneous Processing Areas
PTP	Personnel Training Plan
TPA	Truck Parking Areas 1 and 3 : For Up to 10-Days or Less
TTTA	Truck-to-Truck Transfer Area, Including Loading/Unloading Dock (Containers)
WAP	Waste Analysis Plan
WMA	Waste Management Area

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
Section V - Compliance Schedule				
V (1)(c)	Not Applicable (N/A)	RCRA Permit App	The former Waste Pile or "S03" unit with a historical location at the formerly Spill Control is currently designated as the BULA. This location needs to remain listed in the Part A as an "S03" unit until it has been closed through a RCRA closure and certification process. Clean Harbors may add a comment on section 13, page 6 of 6, of the Part A, describing the historical background of the Waste Pile unit or "S03" at the Site. The S03 unit shall be shown in the Closure Plan Site Plan. Please revise the pages accordingly or Clean Harbors can initiate the formal RCRA closure of this unit to remove it from the Part A.	The former waste pile is still in review and the Facility will update accordingly.
V(1)(d)	N/A	RCRA Permit App	The Permittee shall revise the Process Codes and Design Capacities listed in Item 7 and 8, of the Part A to agree with the Permitted Activities and volume capacities of this Permit. For example, Tank Treatment should be a "TO4" process code with a capacity of 14,952 gallons, also the unite measure of "Y/Day" is not a valid unit of measure per the units listed in item C, Treatment.	Under review by Facility.
V(2)	N/A	WAP	WAP Submitted for approval 45 days after issuance of the permit addressing comments.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(a)	N/A	WAP	It appears that the WAP submitted with the application, dated revised 2/01/2017, is from the expired permit (DEP/HWM-017-004). The information presented in the plan is outdated containing numerous discrepancies. Please revise the WAP to address the content and organization to demonstrate compliance with the RCRA requirements of 40 CFR 264 and, the permitted activities of this Permit.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(c)	N/A	WAP	Please remove any duplicate information that exists elsewhere in the permit application (e.g., basic facility description) that are not pertinent to the WAP. Please delete, item 1.1.3, Description of Waste Management Areas, page VI-4 to page VI-10. The secondary containment description, volume capacity and activities description are not requirements of a WAP.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(2)(d)	N/A	WAP	Page VI-1, item 1.1.1, Facility Processes and Activities, waste management process activity number 5, Special Wastes, shall be revised to comply with the solid waste definition and hazardous waste definition as "Special Wastes". The Department does not consider Lab Pack Container or Lab Pack, and RCRA-empty containers to be a special waste. In addition, Section I, of this Permit, defines "Other Material" or "Other Materials" that includes a variety of commercial chemicals. Special wastes as listed on pages VI-1, VI-3, VI-9, VI-28, VI-29, VI-30, and other pages of the WAP are inaccurate.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(e)	N/A	WAP	Page VI-1, item 1.1.1, Facility Processes and Activities, waste management process number 8, Other Activities. It was brought to our attention that Clean Harbors is co-storing DEA wastes in the Container storage Area Building. Please provide a description of the nature of these wastes, how this type of waste is received and managed at the facility; and subsequent reshipment off-site. Also, provide the handling/storage requirements and procedures for this waste.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(g)	N/A	WAP	Page VI-3, under the list of Hazardous Wastes. A clarification statement shall be included for the appropriate use of the waste code "D003" as defined in Section II of this Permit. Also, the metal hydroxide sludge "listing" shall be removed from the non-hazardous waste category. The metal hydroxide sludge should be categorized as a hazardous waste.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(h)	N/A	WAP	Page VI-10, item 1.2. Waste Analysis Parameters, subsection 1.2.2, Parameter Selection Process, states that "the selection of the waste analysis parameters is based on a review of generator-supplied information". However, the parameters in the Generator Waste Material Profile Sheet (GWMPS) do not match the parameters listed in this section of the WAP. Also, other discrepancies can be found in the listed supplemental testing parameters. However, the basis for the selection of the waste analysis parameters were not provided in the rationale section. It should be noted that the "volatile organic screen" for incoming bulk loads; item No. 10, Distillation, and the GC/MS Scan are not testing parameters. Also, the "specific gravity testing parameter" is missing in this section, it is required parameter and should be listed in the GWMPS. Please revise this section to accurately represent the rationale used for the selection of the parameters for the waste streams handled at the Facility.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(2)(i)	N/A	WAP	Confirm sampling equipment and rational in Appendix I-11	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(j)	N/A	WAP	Page VI-19 item 1.3.4 Samples should be analyzed immediately upon arrival.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(l)	N/A	WAP	Lab QA/QC procedure included in WAP	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(m)	N/A	WAP	Ensure all test methods are listed in VI-24, Table 1.4	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(2)(n)	N/A	WAP	On Page VI-27, item 1.5 Waste Re-Evaluation Frequencies, (waste streams received from off-site) states that “if the analysis reveals a change, a new waste code shall be provided, and the original code made inactive.” Provide the procedures used to notify the off-site facility(is) of changes in waste characterization.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(o)	N/A	WAP	On Page VI-27, Re-Evaluation Frequency for On-site Generated Wastes, there is a line item for Personal Protective Equipment (PPE) waste stream that notes on an annual frequency for reevaluation and the required demonstration of “process knowledge.” What are the site-specific criteria used for the PPE waste reevaluation? Please provide the procedures and any site-specific criteria used in this evaluation. Also, are the PPE waste treated on-site prior to off-site disposal?	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(p)	N/A	WAP	On Page VI-27, item 1.6 Special Procedural Requirements, second paragraph there is a line that states “The Central Profile Group (CPG) manages prequalification activities and maintains all necessary associated documentation” Has the CPG been trained in the types of wastes that can be accepted at the facility and the requirements of this Permit? Also, where is the CPG located in the hierarchy of the operations at the Bristol Facility? The Personnel Training Plan does not reference the CPG. Please provide information on the CPG’s role in the waste streams prequalification and the management of wastes at the Bristol Facility.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(q)	N/A	WAP	On Page VI-28, there are several references to “prohibited waste code listed in Section II of the RCRA Part B Permit (Appendix 1-8),” however, Section II of this Permit does not have an Appendix 1-8. Please remove these inconsistencies.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(2)(r)	N/A	WAP	<p>On Page VI-28, under the Special Wastes headings, line 1, states that the generator shall complete and submit a GWMPs along with supporting documentation such as laboratory analyses ...". There seems to be a disconnect between this and the information presented on page VI-1, item 5, Special Wastes. For example, "(g) containers of hardened solids or highly viscous wastes, which cannot be sampled as "(h) RCRA empty containers as defined in 40 CFR 261.7"; explain the reasons and provide the rationale for the need to have a generator submit a GWMPs for empty containers.</p> <p>(i) Please be aware, that the Facility is only permitted to accept empty aerosol cans, with a maximum of 32 ounces capacity.</p> <p>(ii) On page VI-3, under Solid wastes received from off-site facilities include "asbestos containing materials and biomedical wastes and scrap metal" and on page VI-29, these wastes streams are considered Special Wastes along with pesticides and herbicides; isocyanates; off-specification commercial chemical products; and contaminated commercial products, etc. Please address these waste streams acceptance, characterization, verification and fingerprinting so that they are in accordance with the permitted activities described in Section II of this Permit.</p>	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(s)	N/A	WAP	Confirm Page VI-33, mite 1.6.3 has been updated to April 2015 Document	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(t)	N/A	WAP	On Page VI-36, item 1.6.7, RCRA Air Requirements, this paragraph should be revised to indicate that organic concentrations greater than 500 ppm are applicable for container storage only. Tank storage of organic concentrations greater than 500 ppmw are prohibited at the Facility	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(u)/V(2)(bb)	N/A	WAP	Drivers will check in with Facility's Compliance Guard to verify shipment information" but Appendix 8-1, Employee Development Record, and Appendix 8-3, Job Descriptions do not include a "Facility's Compliance Guard" as an employee at the Facility. Please address and correct the deficiency and inconsistency accordingly.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(2)(v)	N/A	WAP	On Page VI-35, Table 1.1, Offsite Waste Characterization; and on page VI-36, Table 1.2, Waste Verification, indicates that BTU Value Testing is not conducted for any of the waste streams. However, the WAP narrative, page VI-15, Supplemental Testing Parameters states that BTU Value determines the heat value of the waste for fuel blending. There is a disconnect between the Tables and the narrative. Please correct this discrepancy/inconsistency.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(x)	N/A	WAP	On Page VI-35, Table 1.1, Offsite Waste Characterization; and on page VI-36, Table 1.2, Waste Verification, it is presented that testing for pesticides & herbicides (Endrin, Lindane, methoxychlor, toxaphene, 2,4-D, 2,4,5-TP (Silvex), Chlordane, heptachlor (and its epoxide) is conducted for all the waste streams but it does not match the narrative in the WAP. Please explain and correct this discrepancy.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(y)	N/A	WAP	Table 1.1, Offsite Waste Characterization; and Table 1.2, Waste Verification, contains numerous testing inconsistencies that will require revisions. These revisions are for a better understanding of the waste sampling protocol at the Facility. For example, PCB's are being tested for hazardous constituents, but the concentrations of the PCB's are not tested. The concentration level of the PCB's can trigger compliance with TSCA requirements. The PCB's waste characterization and verification procedures should be revised, and a copy of the updated procedure should be incorporated into the updated WAP.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(z)	N/A	WAP	Appendix I-2, Outside Lab Chain of Custody Form, presents an Analytical Request Chain of Custody for Belmont Labs, located at 25 Holiday Drive, Englewood, Ohio, Is this laboratory a certified Connecticut laboratory?	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(2)(cc)	N/A	WAP	Appendix I-6, Waste Receiving Report is dated 12/21/2005. Please submit a copy of the most current example of a waste receiving report being used for the Bristol Facility. Please note that Hazard Class 4.1, flammable solids are prohibited at the Bristol Facility.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(dd)	N/A	WAP	Verify Permitted Waste Codes are removed from the WAP, Appendix 1-8	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(2)(ee)	N/A	WAP	There is a major deficiency in the WAP on how the Land Disposal Restrictions (LDR) requirements (40 CFR 268) are applied to the Mix-Tub waste streams that are either received from off-site and/or generated from this operation as well as with other wastes generated at the Facility. The WAP shall be revised to clearly demonstrate the procedures for the evaluation, sampling (including number of samples, type of samples (grab or composite), criteria used in its selection, etc.) testing, treatment performance, etc. Please refer to the April 2015, WAP guidance document to address this requirement.	Submitted November 15, 2021, Comments back from DEEP June 7, 2022, response July 22, 2022; still under consideration by DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)	N/A	Inspection Plan	Inspection Plan submitted within 60 days of issuance of permit.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(a)	N/A	Inspection Plan	Page 3, table 1, delete subareas reference.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(3)(b)	N/A	Inspection Plan	Page 4, item 2.0, Inspection Methods and Use of Electronic Forms, second sentence states that "... certain non-RCRA inspection items can be included on the Inspection Forms." Remove from the narrative the line of "Such items can be added or deleted at the facility discretion." The use of this phrase is not acceptable nor accurate.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(c)	N/A	Inspection Plan	Page 4 Item 2.0, Provide WINWEB SOPs.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(d)	N/A	Inspection Plan	Page, 6, Table 2., "Regulatory Framework of the Facility Inspection Program," fails to include the regulatory requirements for Tank Storage Inspections. Please revise Table 2 accordingly, to include regulatory requirements for Tank Storage and the minimum requirements for the Miscellaneous Operations such as the 10- Day or Less Trailer Storage permitted activity at the Facility.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(e)	N/A	Inspection Plan	Appendix I of the Inspection Plan, under the Safety and Emergency Equipment Systems, states that the SCBA is inspected monthly but on page 31 of the Contingency Plan states that the SCBA is tested bi-monthly. Please clarify which statement is correct? Are these inspections and tests being logged? Please address the inconsistency accordingly.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(f)	N/A	Inspection Plan	Appendix 3, Tank Management Inspection Elements, Methods, and Inspection Frequency includes Volatile Organic (VO) Emissions Controls Inspections for Tank14; however, the Department was notified by Clean Harbors on December 31, 2018, that the facility cannot comply with the requirements of Subpart BB and CC for the storage of volatile organic with a concentration above 500 ppmw in the storage tanks and decided not to pursue such waste storage. Please address and revise the discrepancy accordingly.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(g)	N/A	Inspection Plan	In Appendix 3, Tank Management Inspection Elements, Methods, and Inspection Frequency, please include a line item for the inspection and execution of "annual removal of tank bottoms (sludge residual)."	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(3)(h)	N/A	Inspection Plan	Appendix 4, Other Waste Management Inspection Elements, Methods, and Inspection Frequency, under the Inspection Parameter, Truck Parking revise the frequency for the inspection element of “Inspect secondary containment sumps for accumulated liquids and solid debris” from weekly inspection to “daily inspection.” This area does not have roof and is susceptible to the weather elements such as precipitation, snow, and spills.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(i)	N/A	Inspection Plan	Appendix 5. Daily, Weekly, Monthly and Annual Inspection Logs. This Appendix shall include at a minimum, the Emergency Equipment quantity listed in the Contingency Plan, specifically: (1) Page 24, item 1.3.4, Fire Control Equipment; (2) Page 24, item 1.3.5, Spill Control Equipment; (3) Page 25, item 1.3.6, Safety and First Aid Equipment; (4) Page 25, item 1.3.7, Personal Protective Equipment; (5) Page 25, item 1.3.11, Emergency Stations, etc.,	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(j)	N/A	Inspection Plan	Add, a line to daily inspection to inspect for “accumulated liquids” in the secondary containment.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(k)	N/A	Inspection Plan	Appendix 5. Daily, Weekly, Monthly and Annual Inspection Logs. The Spill Control Area, secondary containment, add a line item to check for “accumulated liquids”. This area is vulnerable to spills and releases. Also, under Pumps correct the typos “Equipment”, “deterioration” should it read “Equipment”, “deterioration”? Also, add an inspection line to check if the pumps are operational, and corrective measures to fix the problem.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(l)	N/A	Inspection Plan	Appendix 5. Daily, Weekly, Monthly and Annual Inspection Logs. Delete Inspection of Truck Parking Areas 2 – This area does not exist nor is permitted.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(m)	N/A	Inspection Plan	Appendix 5. Daily, Weekly, Monthly and Annual Inspection Logs. Under Truck Parking Area 1 and Truck Parking Area 3 secondary containment add an inspection line item to check for “accumulated precipitation/snow/debris” as well as to “whether it has been removed” since these areas are in the open with no roof coverage.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(3)(n)	N/A	Inspection plan	Appendix 5. Daily, Weekly, Monthly and Annual Inspection Logs. Under the Process Areas, Pour-off Station add an inspection line item to check for “accumulated liquids” as well as to “whether it has been removed”.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(o)	N/A	Inspection Plan	Appendix 5, Monthly Inspection Logs. The Roll-off and Storage Area is inspected monthly for accumulated precipitation, this is not acceptable because this area does not have a roof and is located outdoors subject to the weather elements. Please add the roll-off storage area to the daily inspection log for “accumulated liquids” to ensure that the sump is capable to hold its design volumetric capacity as well as to “whether it has been removed.”	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(p)	N/A	Inspection Plan	Appendix 5. Daily, Weekly, Monthly and Annual Inspection Logs. Under the Two-way radils – Operational. Please explain what are “radils”?	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(q)	N/A	Inspection Plan	Appendix 5. Annual Inspection Logs for Tanks 11 and 14. Include an inspection line item to check the tanks for the accumulation of sludge on the bottom of the tank or “tank bottom sludge removal” to prevent the tanks from overflowing.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(r)	N/A	Inspection Plan	Forms code 218 and 251, list a Truck Parking Area 2. This Area is not an approved permitted location as noted in Section II, Permitted Activities of this Permit. Please remove the reference to “Truck Parking 2.” code 218 and 251, list a Truck Parking Area 2.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(s)	N/A	Inspection Plan	The Inspection logs for the Truck Parking Areas 1 and 3 states that trucks are staged for less than 5 days. Is Clean Harbors inspecting this 10-Day or Less Area daily every 5 days? There seems to be a discrepancy, please revise the inspection log or provide an explanation on how these vehicles are inspected.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(3)(t)	N/A	Inspection Plan	Form Code 268, Tank Annual Inspection should include a line item on the removal of bottom sludges from the storage tanks on an annual basis to prevent any false or inaccurate volume storage capacity.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(u)	N/A	Inspection Plan	Include in the Inspection Plan and Log the Emergency Equipment and quantities maintained at the Facility listed in the Contingency Plan, "see item 1.3, pages 23 to 27." The Inspection logs should have a line item to note if any deficiencies (e.g., missing items) when discovered during the inspection and when corrective actions taken. Please revise accordingly.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(v)	N/A	Inspection Plan	The inspection frequency in the Inspection Plan and Contingency Plan should be in agreement. Please correct any discrepancies so the frequency is consistent in both plans.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(x)	N/A	Inspection Plan	Include in the Inspection Plan an inspection log checklist for the Air Monitoring Instrumentation and Controls listed in item 1.3.13 of the Contingency Plan (Page 27) to ensure proper operation of the equipment. Please update accordingly.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(y)	N/A	Inspection Plan	The Inspection Plan shall have a log checklist with a line item to determine if the Standard Operating Procedures (SOP) for activation of the Dispatcher Services is up to date for the Facility. Please update accordingly.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(3)(z)	N/A	Inspection Plan	Once each calendar year after issuance of this Permit, the Permittee shall retain the services of a third-party qualified consultant to perform a hazardous waste compliance and operational safety audit. In addition to compliance with the facility permit, the consultant shall evaluate and report on the operational safety items listed in Section III of this Permit. Please maintain these evaluations with the Inspection Logs Operating Record at the Facility.	Last revised May 11, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(4)(a)	N/A	PTP	Confirm submittal of PTP within 30 days of issuance of permit that senior management have been trained in the requirements of this permit.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)	N/A	PTP	Confirm submittal of PTP within 60 days of issuance of permit addressing permit conditions Section V(b)(i-ix)	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(i)	N/A	PTP	Confirm job title matches job decryptions for the facility.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(ii)	N/A	PTP	Page 8, item 3.j; and page 9, item 4.c. states that employees are trained on the operation and activation of the SPOK, Inc. (formerly AMCOM) e-Notify system, please update the Dispatcher Service provider with the one listed on Page 10 of the Contingency Plan (Rave Mobile Safety, Inc.) and make the appropriate correction on appropriate plan.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(iii)	N/A	PTP	Submit the Standard Operating Procedure (SOP) that Clean Harbors' Bristol Facility has in place for the dispatcher Services. The SOP should list the roles and procedures for the Dispatcher Services and Clean Harbors' expectations for such Services.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(iv)	N/A	PTP	Appendix 8-1, Employee Development Record, presented an out-of-date training record that was completed by Bryan Campbell. Please include with the revised Appendix and provide a copy of the most recent training record for all the employees involved in the management of hazardous wastes at the Facility.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(4)(b)(v)	N/A	PTP	Appendix 8-2, Description of Additional Training, last paragraph describes a Truck-to-Truck Transfer Plan of the Permit that will be used to train personnel. Please submit the Truck-to-Truck Transfer Plan for review and approval by the Department along with the system tracking tools used for the training that was mentioned in the paragraph.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(vi)	N/A	PTP	There is a discrepancy with the employee named "Jose Vega." The Personnel Training Plan is listing him as an "WWT Operator Facility," while the Contingency Plan is listing him as an "Alternate Emergency Coordinator" with a title of "Facility Foreman." At the same time, Table 8.1B., Required Training for each Job Title, he has the title of "Plant Foreman." Please correct the noted inconsistencies and update the document with the correct name and title(s) for all employees. Please review the job titles and the designated personnel in both plans to ensure they are correct and consistent. Please note, at the time of an inspection, the inspector can request records for each employee handling hazardous wastes.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(vii)	N/A	PTP	During the review of the Waste Analysis Plan, specifically page VI-22, item 1.3.6, Sampling Health Protocol, it is noticed that "all personnel must be properly trained ...as described in the Personnel Training Plan (Attachment D)", however, the Personnel Training Plan does not describe nor contains a description of such training. Please update the Personnel Training to include the required training.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(viii)	N/A	PTP	During the review of the Waste Analysis Plan, specifically page VI-36, item 1.6.8, Receiving and Handling Paint Waste from the Paint Care Program, states that "Upon arrival at the Facility the driver ... will check with the Facility's Compliance Guard to verify shipment information" but Appendix 8-1, Employee Development Record, and Appendix 8-3, Job Descriptions of the Personnel Training do not include a "Facility's Compliance Guard" as an employee at the Bristol Facility. Please include the correct information as it pertains to the Bristol Facility. Also see "Item 2(bb)" for similar situation.	Last Revised April 27, 2022, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(4)(b)(xi)	N/A	PTP	An evaluation of the adequacy of current staffing levels at the Bristol Facility shall be conducted by an Independent Contractor 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. This evaluation shall be conducted as part of the annual 3rd Party Audit.	Evaluated training, preparedness, procedures, minimization of future incidents.
V(5)	N/A	Contingency Plan	Confirm submitting of the Contingency Plan within 60 days of permit issuance which addresses Section V(5)(a-j)	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(5)(a)	N/A	Contingency Plan	Within thirty (30) calendar days of the Commissioner’s written approval of the revised plan, the Permittee shall send by certified mail or electronic mail with a request for a return receipt or a reply confirmation, the transmittal of the approved Contingency Plan revisions to the police, fire department, hospital and emergency response teams in the vicinity of the facility.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(b)	N/A	Contingency Plan	Page 24, item 1.3.3 Public Address System, mentions reference to “administrative building” but the site plan for the Facility does not show any location of an Administrative building. Please revise accordingly.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(c)	N/A	Contingency Plan	Page 24, item 1.3.3, Public Address System, second paragraph, uses the term “Plant Supervisor’s Office” but such a term is not included in the Personnel Training, Table 8.1B, Required Training for Each Job Title. Please revise the discrepancy accordingly to reflect the correct location or employee.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(d)	N/A	Contingency Plan	Page 24 of the Contingency Plan lists a 250-pound portable Aqueous Film Forming Foam (AFFF) extinguisher. Is this PFAS or PFOA-based? If it is PFAS or PFOA based, Clean Harbors should look for an alternative fire extinguisher. Please provide an explanation and address accordingly.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(e-f)	N/A	Contingency Plan	(e) Page 25, of the Contingency Plan, item 1.3.7 lists “Two (3) SCBA” please revise accordingly. (f) Page 26, of the Contingency Plan, item 1.3.11 lists “Two (3) SCBA” please revise accordingly.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(g)	N/A	Contingency Plan	Page 28, of the Contingency Plan, item 1.4.2, On-site Evacuation Procedures, third paragraph refers to “visitor log kept in the Administration Office, as well as the one maintained at the facility entrance” but the site plan does not show the location of an “administration office” and the facility does not have guarded facility entrance. Please explain and revise the discrepancy accordingly.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(5)(h)	N/A	Contingency Plan	Page 28, of the Contingency Plan, item 1.4.2, On-site Evacuation Procedures, third paragraph refers to “department supervisors” but this title is not included in the Personnel Training, Table 8.1B, Required Training for Each Job Title. Please revise the discrepancy accordingly.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(l)	N/A	Contingency Plan	Page 31, of the Contingency Plan, states that “The SCBA units maintained on-site are tested bi-monthly ...” Are these inspections being logged, if not they should be included as part of the inspection schedule?	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(5)(j)	N/A	Contingency Plan	Appendix 6, Waste Management Areas, of the Contingency Plan should be revised to reflect the correct activities, wastes types and quantities per Section II, Permitted Activities, of this Permit. For example, revise “9-40 cubic yard roll offs to 7-40 cubic yard rolls; this area is limited in space due to the mix-tub activities for solidification and stabilization and the Vactor Trucks unloading area. and revise the line item for Tank No. 14, volatile organic waste stream since the tank is not fitted to accept volatile organic wastes with a concentration above 550 ppmw.	Last Revised February 15, 2023, awaiting approval from DEEP. Recommended to update the plans that are pending review by DEEP with the current Facility personnel contact information so that plan is administratively complete and actionable.
V(6)	N/A	Closure Plan	Confirm submittal of Closure Plan within 90 days of permit issuance addressing permit conditions Section V(6)(a-i)	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(a)	N/A	Closure Plan	As a general comment, revise Item 9.3, Description of Regulated Units, to match the permitted language. For example, the MBSTA description states “... removal of free draining solids – Provide a description of this free draining solid?”	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(b)	N/A	Closure Plan	Item 5, Container Storage Area C, states that storage of flammable prior to treatment onsite. The facility is not permitted to treat flammable wastes. Please revise accordingly.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(c)	N/A	Closure Plan	Item 6, BULA. The fourth item regarding “the disassembly and consolidation of Lab packs containers” at this location, is not a permitted activity.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(d)	N/A	Closure Plan	Item 7, CSA. Please remove from the description the following items: (i) second item, loading /unloading of non-bulk containers ... from the trailers located in front of the Container Storage Building; (ii) third item storage of frozen bulk containers (i.e., roll-offs) (this is not a permitted activity); (iii) fifth item, resampling containers is not a permitted activity in this area.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
V(6)(e)	N/A	Closure Plan	Delete from the description any mentioning of "PCB containing prior to treating onsite." The facility is not authorized to treat PCB containing wastes onsite.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(f)	N/A	Closure Plan	Item 10, Former Waste Pile. This unit that has not undergone a RCRA closure. Provide a historical background description for this unit. Also, provide the procedures that will be used for the RCRA closure of this unit. The procedures shall comply with the 40 CFR 264 Subpart G and Connecticut closure requirements and the closure requirements of this Permit. A schedule for the formal closure of this unit shall be provided to the Commissioner for review and approval within thirty (30) calendar days of the issuance of this Permit.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(g)	N/A	Closure Plan	Page 8, Table 9-1, Permitted Management Units Requiring Closure, shall be updated to reflect the Permitted Activities listed in Section II of this Permit. The quantity for Area "A" shall read 2,750 gallons. The citation under the maximum storage capacity for the Solidification and Stabilization Area is not accurate. Provide a description of the alkaline waste in this activity. Please revise the discrepancies accordingly.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(h)	N/A	Closure Plan	Page 23, Table 9-5, Required Sampling for Waste Management Areas, shall be updated to incorporate the Truck-to-Truck Transfer Area (5 Bays) and the Waste Pile (S03 unit) as a separate line item. Revise the required sampling to reflect the Permitted Activities described in Section II of this Permit.	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(6)(i)	N/A	Closure Plan	Page 25, item 9.2, Closure Performance Standard. The citation "40 CFR 265.111" is only applicable to Interim Status Facility. Please revise the citation to read "40 CFR 264.111".	Last Revised December 17, 2021, Currently updating costs, conditional approval April 12, 2022.
V(7)	N/A	General Submittals	On or before November 1st, 2021, the Permittee shall submit for review and approval a revised Drawing 62WC-7100-205, Titled - Permitted Storage Areas A, B, D, E, F, G & J, with the correct volume capacity for Area "A", it shall read 2,750 gallons instead of 5,500 gallons.	Reviewed Facility Maps, Facility Maps were updated.
V(8)	N/A	General Submittals	On or before November 1st, 2021, the Permittee shall submit for review and approval by the Commissioner a Drawing for the permitted Bulk Unloading and Loading Area (BULA), such a drawing shall show the locations of all the connectors for the unloading/loading of wastes, pumps and any other equipment utilized in the transferring of waste to the Facility Wastewater Treatment, and Tank Storage.	Reviewed Facility Maps, Facility Maps were updated.
V(9)	N/A	General Submittals	On or before November 1st, 2021, the Permittee shall submit for review and approval by the Commissioner a Drawing for the permitted Mix-Tub, Bulk Storage and Transfer Area (MBSTA) showing the location of the Mix-Tub Area, the roll-off delineation layout and the Vacuum Vehicle Unloading/Loading Area.	Reviewed Facility Maps, Facility Maps were updated.
V(10)	N/A	General Submittals	On or before November 1st, 2021, the Permittee shall submit for review and approval by the Commissioner a Drawing for the Miscellaneous Processing Areas (Drum Rinsing Station, Drum Crushing Station and Lab Pack Pour-Off Area). At a minimum it shall show the locations in the Operations Building with respect to the other activities.	Reviewed Facility Maps, Facility Maps were updated.
V(11)	N/A	Audit	On or before December 1st, 2021, the Permittee shall submit for review and approval by the Commissioner a schedule for the procurement, and selection process of the third-party auditor and the implementation of the audit as specified in Section III (44)(b).	Previously Completed.

Table A-2-V
Permit Issuance Comments ^(a)
Clean Harbors of Connecticut, Inc. / Bristol CT

Permit Citation	Reference Citation	Keyword	Requirement Summary	Observations
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^(a) Permit Section V refers to comments to be addressed after Permit Issuance.

Acronyms and Abbreviations	
ASC	Area to Stage Containers
BULA	Bulk Unloading and Loading Area
CSA	Container Storage Area
MBSTA	Mix-tub, Bulk Storage and Transfer Area
MPA	Miscellaneous Processing Areas
PTP	Personnel Training Plan
TPA	Truck Parking Areas 1 and 3 : For Up to 10-Days or Less
TTTA	Truck-to-Truck Transfer Area, Including Loading/Unloading Dock (Containers)
WAP	Waste Analysis Plan
WMA	Waste Management Area

Table A-3
Permit Compliance Audit
Documentation Reviewed
Clean Harbors of Connecticut, Inc. / Bristol CT

Documentation/Plan/Record Name	Reviewed
2021 Biennial Report	X
Clean Harbors Audit form	X
Clean Harbors of Connecticut Third Party Annual Audit Checklist	X
Closure Plan	X
Contingency Plan	X
Contingency Plan Distribution Cover Letters	X
Daily Inspection Log	X
Daily TTT Inspection Log	X
Drawings submitted to DEEP	X
Employee Training Records	X
Final Permit	X
Inspection Plan	X
Inventory	X
Manifests	X
Monthly Inspection Log	X
Personnel Training Plan	X
Rejected Manifests	X
Spill History	X
Spill report letters to DEEP	X
Tank 11/14 Inspection/ Certification	X
Waste Analysis Plan	X
Waste Minimization Plan	X
Weekly Inspection Log	X

Table A-4
Permit Compliance Audit
Used Oil Addendum
Clean Harbors of Connecticut, Inc. / Bristol CT

USED OIL--COLLECTION CENTER & AGGREGATION POINT REQUIREMENTS	
40 CFR 279 Subpart D 22a-449(c)-119(a) & (e)	
Requirements	Observations
Does the facility receive used oil from off-site (If no, skip remainder of section)?	No
If yes, does the facility only receive used oil that is:	
From facilities that it owns or operates?	
In shipments of 55 gallons or less?	
In vehicles owned by the generator or an employee of the generator?	
(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?	
List the site(s) shipping used oil to this location	
List off-site destination(s) for used oil stored at this site	

Used Oil Addendum
Clean Harbors of Connecticut, Inc. / Bristol CT

USED OIL--TRANSFER FACILITY REQUIREMENTS	
40 CFR 279.45 22a-449(c)-119(a), (c), & (e)	
Requirements	Observations
Does the facility receive used oil from off-site (If no, skip remainder of section)?	No
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.)	
Does the facility store used oil for more than 10 days? (If yes, stop here and go to processor section.)	
Is used oil that is received from off-site managed in accordance with the following transfer facility requirements:	
Total halogen determinations and rebuttable presumption	
Retention of total halogen determination records for at least three years	
Storage in tanks or containers that are in good condition and not leaking	
Provided with impervious base and secondary containment	
Labeled or marked with the words "used oil"	
Shipped off-site via transporters that are permitted and have notified EPA	
Is the facility also in compliance with the following used oil transporter requirements (see above section):	
Notification and obtaining an EPA ID Number	
Records of used oil shipments	
Secondary containment for transfers from one transport vehicle to another	
Has the facility had any known releases of used oil?	
If yes, did the facility: Report the spill to DEEP, and Comply with "response to release" requirements (Explain)	
Is the facility engaged in the business of storage of used oil?	
If yes, does the facility have a 22a-454 storage permit?	
List the site(s) shipping used oil to this location	
List off-site destination(s) for used oil stored at this site	

Used Oil Addendum
Clean Harbors of Connecticut, Inc. / Bristol CT

USED OIL--PROCESSOR & RE-REFINER REQUIREMENTS	
40 CFR 279 Subpart F	22a-449(c)-119(a), (d), & (e)
Requirements	Observations
Is the facility either of the following:	
A used oil transfer facility which stores used oil on-site for greater than ten days?	No
A processor or re-refiner of used oil at the site? (If no to both questions, skip remainder of section)	No
Is the facility's used oil processing limited to one or more of the following activities: (If yes, skip remainder of section)	
Allowed generator processing activities as specified in 40 CFR 279.20(b)(2)(ii)(A)-(E)?	
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?	
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?	
Incidental processing conducted by burners during the normal course of used oil management prior to being burned on-site?	
Is the facility in compliance with the following processor requirements:	
Total halogen determinations and rebuttable presumption	
Retention of total halogen determination records for at least three years	
Storage in tanks or containers that are in good condition and not leaking	
Tank and container storage areas provided with impervious base and secondary containment:	
Tanks and containers labeled or marked with the words "used oil"	
Notification/obtaining an EPA ID Number (40 CFR 279.51)	
Preparedness and Prevention (40 CFR 279.52(a) and RCSA Section 22a-449(c)-119(a)(2)(II))	
Contingency Plan and Emergency Procedures (40 CFR 279.52(b))	
Closure (40 CFR 279.55(h) and RCSA Section 22a-449(c)-119(d))	
Waste Analysis Plan (40 CFR 279.55)	

Used Oil Addendum
Clean Harbors of Connecticut, Inc. / Bristol CT

Tracking records (40 CFR 279.56)	
Operating Records and Reporting (40 CFR 279.57 and RCSA Section 22a-449(c)-119(a)(2)(AAA))	
USED OIL--PROCESSOR & RE-REFINER REQUIREMENTS 40 CFR 279 Subpart F 22a-449(c)-119(a), (d), & (e)	
Requirements	Observations
If no to any of the above, explain:	
Is used oil shipped off-site via transporters that are permitted and have notified EPA?	
Does on-site processing of used oil produce any wastes or residues?	
If yes, are these materials properly managed as used oil(s) or hazardous waste(s)? (Explain)	
Is the facility engaged in the business of storage and/or processing of used oil:	
If yes, does the facility have a 22a-454 permit for these activities?	
List the site(s) shipping used oil to this facility:	
List off-site destination(s) for used oil stored or processed at this facility:	

Table A-5
Permit Compliance Audit
Rejected Load Summary
Clean Harbors of Connecticut, Inc. / Bristol CT

Manifest	Reason For Rejection	Waste Originated	Type of Waste	Ultimate Disposition
017880091FL E	Presence of glycol	Danbury Mission Technologies	Non Hazardous, Non DOT Regulated (Sodium Silicate, Alumina) N/A None	re-shipped Clean Harbors of Braintree Inc. (1 Hill Avenue, Braintree, MA, 02184)
018406069FL E	Nitrate	Checon Corporation	RQ, NA3082, Hazardous waste, liquid, n.o.s. (Cadmium Silver), 99 PG III(D006)	Reject to Alternate

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
2020-02-17	in Bristol yard	Release: Non- Transportation, None	<p>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.</p> <p>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.</p>
2020-02-18	slot 4 of dock	Release: Non- Transportation, None	<p>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</p>
2020-04-15	dock	Release: Non- Transportation, None	<p>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.</p>

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
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.

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
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.

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
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.

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
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.

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
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.

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
2021-09-14	dock	Release: Non- Transportation, None	<p>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.</p> <p>The release was the result of a leaking cardboard fiber lab pack container.</p>
2021-10-29	slot 3 of dock	Release: Non- Transportation, None	<p>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</p>
2021-11-09	slot 1 of dock	Release: Non- Transportation, None	<p>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.</p>
2022-01-12	dock	Release: Non- Transportation, None	<p>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.</p>

Table A-6
Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
2022-04-05	dock, slot 1	Release: Non- Transportation, None	<p>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.</p>
2022-04-08	dock, slot 4	Release: Non- Transportation, None	<p>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.</p>

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Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
2022-05-09	dock	Release: Non- Transportation, None	<p>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.</p>
2022-06-07	dock, slot 1	Release: Non- Transportation, None	<p>approximately 8 – 12 ounces of oil and water (CRO2) 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.</p>

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Permit Compliance Audit
Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
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.
2022-09-29	slot 3 area of dock	Release: Non- Transportation, None	Operator moving off-loading totes from inbound van. Foot slipped off pedal and accidentally hit brake too hard spilling over 100-150 gallons of 70% nitric acid tote. Cap instantly came off upon impact. Area quarantined. No injuries.



Table A-6
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Summary of Releases at the Facility ^{(a)(b)}
Clean Harbors of Connecticut, Inc. / Bristol CT

Date	Area of Release	Type of Vessel Involved	Cause of Release
2022-12-09	dock 1 slot	Release: Non- Transportation, None	Operator backed into tote where lid came off and liquid leaked onto secondary containment. Tote transferred to new container. All spilled material containerized and managed as plant waste.
2023-05-21	Bristol CT Facility	Release: Non- Transportation, None	Release of approx. 15 gallons of Waste Flammable Liquid from a 55-gallon drum in a trailer parked in secondary containment at the Bristol facility.
2023-08-18	Truck to Truck Transfer Area	Release: Non- Transportation, None	Release of approx. 1 quart of paint from a 1-gallon paint can in a flex bin within the truck to truck transfer dock.
2023-08-23	Concrete Truck Straging Pad	Release: Non- Transportation, None	a hydraulic line for the lift-gate on a Safety-Kleen Systems, Inc. truck leaked approximately one-half (0.5) to one (1) gallon of hydraulic fluid on the asphalt parking lot in front of the Concrete Truck Staging Pad

^(a) Refer to Permit Appendix III-A & Section III(A)(44) List provided by Clean Harbors Management

^(b) Spills reviewed which occurred in last three years.

**ATTACHMENT B -
PHOTOGRAPHIC LOG**

	<p>Photo ID</p> <p>CH-15</p>
	<p>Photo ID</p> <p>CH-16</p>
	<p>Description</p> <p>Former Drum Rinse Area. Tank 29 – 1,000-gallon Hazardous Waste Metal Bearing Liquids Tank</p>
	<p>Description</p> <p>Former Drum Rinse Area vicinity.</p>