



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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Petition No. 221 HW
Statewide Environmental Services
Staff Report
November 21, 1988

Statewide Environmental Services is requesting a declaratory ruling from the Council that the collection of electrical capacitors containing Polychlorinated Biphenyls (PCB's) in individual steel drum containers, and storage of the drums for less than one year meets the statutory definition of "short-term storage" (Connecticut General Statutes (CGS) Section 22a-115(5)) and would not require a Certificate of Public Safety and Necessity pursuant to CGS Section 22a-117(b)(3).

The project consists of the establishment of a collection center where removal of all electrical capacitors from appliances would take place regardless of whether they contain PCB's or not, disposing of these in a lawful manner, and preparing the processed "white goods" for recycling.

A collection service would be created to pick up all unprocessed white goods from landfills, stores, scrapyards, and other locations. Roll-off containers would be located at these locations for the temporary storage of these appliances. When the containers are full, they would be delivered to the collection center, where the containers would be prepared for off-loading. The appliances would then be removed from the containers, brought into the building and placed on a conveyor system. The appliances would then proceed to work stations where trained personnel would remove the electrical capacitors from the units.

If during the off-loading or handling process a capacitor is found damaged or leaking, it would immediately be removed from the appliance and placed in a sealed isolated container and then placed into a 17H steel drum with the other capacitors. A 17H steel drum is a 55 gallon steel drum approved by the United States Department of Transportation for transporting hazardous waste. The 17H steel drums, when filled, would be sealed, labeled and moved to a bermed storage area for storage. Each drum would be numbered and an envelope attached to each drum containing a listing, identifying the quantity and source of all capacitors. When a truckload of drums is accumulated a manifest would be prepared and arrangements made for transportation and disposal at a United States Environmental Protection Agency approved incinerator.

Pursuant to CGS Section 22a-115(4), "'Treatment' means a method, technique or process, including neutralization, designed to change the physical, chemical or biological character or composition of hazardous waste, in order to neutralize such waste or render waste nonhazardous, safer for transport, amenable to recovery, amenable to storage or reduced in volume." According to the applicant, the facility would not treat or change the physical or chemical configuration of PCB laden articles from their original form.

Pursuant to CGS Sections 22a-115(5 and 6), "'Short-term storage' means the holding of individual containers of hazardous waste in such a manner as not to constitute disposal of such hazardous waste; 'Long-term storage' means the holding of more than fifty-five gallons or five hundred pounds, whichever amount is greater, of hazardous waste at one site for longer than one year." According to the applicant, the capacitors would be held in individual containers for less than one year. The applicant expects to move drums on a bi-monthly basis.

Pursuant to CGS Section 22a-117(b), "Sections 22a-114 to 22a-130, inclusive, shall apply to the construction of any hazardous waste facility except existing facilities and to the construction or modification of any hazardous waste facility except:...(3) any facility used only for the short-term storage of hazardous waste."

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