



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

136 Main Street, Suite 401  
New Britain, Connecticut 06051-4225  
Phone: 827-7682

CSC  
DRAFT

Petition No. 287HW  
Connecticut Treatment Corporation  
Bristol, Connecticut  
Staff Report  
August 18, 1992

On August 12, 1992, Chairman Mortimer A. Gelston, Harry E. Covey, and Daniel P. Lynch, Jr. of the Connecticut Siting Council, and Joel M. Rinebold, Siting Council Executive Director and Robert K. Erling of the Council staff, met Christopher Beyus, and Christopher Borowy of the Connecticut Treatment Corporation (CTC) and Jonathan Black and Stephen Pozner of Clean Harbors, Inc. (parent company of CTC) for a field review of this petition in Bristol, Connecticut.

The CTC is petitioning the Council for a declaratory ruling that no Certificate of Public Safety and Necessity (Certificate) would be required to implement proposed changes at its existing hazardous waste treatment facility on 51 Broderick Road, Bristol, Connecticut.

Pursuant to Connecticut General Statutes (CGS) Section 22a-117 no person shall commence construction or modification of a hazardous waste facility unless such person has been issued a Certificate by the Council. Under CGS Section 22a-115 (9), "Modification" means "a) any change or alteration in the design, capacity, process or operation of an existing hazardous waste facility requiring a new permit from the commissioner pursuant to chapter 445, 446c, 446d or 446k, that the council deems significant or (b) any change or alteration in the approved design, capacity, process or operation of a hazardous waste facility constructed or operating pursuant to this chapter that the council deems significant. Such change or alteration may include but is not limited to a change or alteration in the volume or composition of hazardous waste disposed of at such facility. The routine maintenance, repair or replacement of the individual components at a hazardous waste facility that is necessary for normal operation or a change or alteration at a hazardous waste facility ordered by a state official in the exercise of his statutory authority shall not be deemed to be a modification."

CTC requests that the Council rule separately that each of the following changes would not require a Certificate from the Council:

1. Wastewater Treatment System Improvements

CTC proposes to add new equipment and replace existing wastewater treatment equipment. The new treatment system would utilize biological oxidation and chemical oxidation. The wastewater treatment system improvements would require the following new equipment components: 15 acid wastewater storage/treatment tanks (160,000 gallons capacity); 7 caustic wastewater storage/treatment tanks (52,000 gallons capacity); 4 oily wastewater storage/treatment tanks (60,000 gallons capacity); 21 neutral wastewater storage/treatment tanks (261,000 gallons capacity); and 12 virgin chemical tanks (27,800 gallons capacity). Expansion of the Main Process Building would be required to house these new wastewater treatment tanks. There are no waste codes applicable to CTC's treated wastewater discharge because treated wastewater is specifically exempted from the RCRA definition of solid waste. CTC contends the new equipment would be exempt from Resource Conservation and Recovery Act (RCRA) permit requirements and the Council, and would instead be permitted by the DEP under the Clean Water Act.

2. Metal Hydroxide Filtration Units

CTC is presently permitted for two metal hydroxide sludge belt filter units, (only one of which is in operation) and one diatomaceous earth rotary drum vacuum filter. These new units would be placed within an expanded area of the Main Process Building. CTC proposes to replace these units with modern equipment, and contends that these wastewater treatment units will be permitted by the DEP under the Clean Water Act, rather than under RCRA, and would not be subject to the Council's jurisdiction.

3. Wastewater Discharge Rates

Under CTC's 1986 wastewater discharge permit, any increase from the present 50,000 gallon per day (gpd) discharge limit to a 100,000 gpd daily average flow rate and 150,000 gpd design flow rate (daily maximum) to the City of Bristol publicly owned treatment works (POTW) would require a Certificate from the Council. The CTC discharge rate of treated, non-hazardous wastewaters would increase to 100,000 gpd average and 150,000 gpd maximum daily rate. CTC contends that this increase is not subject to Council jurisdiction, consistent with a precedent ruling, made by the Council in 1987, (Petition 196HW) in which the Council declared it did not have jurisdiction over the discharge of non-hazardous wastewaters.

4. New Short-Term Container Storage Building

CTC proposes to construct a new 80-foot by 140-foot storage building for the short-term storage of containerized wastes. The new building, to be located to the rear of, and adjacent to, the existing Main Process Building, would provide container storage for a maximum of 137,280 gallons in 55 gallon drums. Twelve storage bays would be constructed within the new building. This new building would be constructed within a paved area, and would require the removal of several pine trees and a concrete retaining wall. Because the containers would be stored at the facility for less than one year, CTC requests the Council rule that this would meet the definition of exempt short-term waste, and that no Certificate would be needed.

5. Container Handling Practices in Short-Term Container Storage Areas

CTC is presently permitted to store a maximum of 55,000 gallons of containerized wastes within ten segregated storage bays, which are located within the two existing buildings at the facility. CTC proposes to initiate container to container transfers and the consolidation of waste materials in containers. These operations presently take place within the spill control area of the facility, in the Drum Storage Building and the Main Process Building. This action would result in an increase in the container storage capacity of the existing facility to 60,720 gallons, which is the maximum capacity of the facility's existing container storage structures. CTC believes the relocation of these activities to other containment areas within the Main Process Building, existing Drum Storage building, and the proposed new container storage building would not be a significant modification to facility operations.

6. Solidification/Stabilization Area

During solidification and stabilization, dry stabilization agents such as cement kiln dust, lime, or fly ash are mixed with waste materials. After mixing in the reagent, the container is topped off with reagent, closed, and moved to storage for shipment off the CTC facility. This operation had been conducted on the floor of the solidification area, which was formerly permitted as a waste pile. CTC proposes to conduct these activities within DOT approved containers in the same area. No structural modifications would be needed to continue the solidification/stabilization activities. The only

change would be that the solidification/stabilization operations would take place inside roll-off or dumpster containers instead of directly on the concrete floor. CTC believes the solidification and stabilization activity would not constitute a major modification to the facility.

7. Transshipment/Storage Facility Capability

CTC proposes to combine manifested shipments of containerized hazardous and non-hazardous wastes from different waste generators into truckload quantities. CTC would store this waste within containers within vehicles or in a CTC permitted storage bay for up to 180 days. The only facility change required would be the construction of secondary containment berms or dikes for larger containers such as rolloffs or for trailers. Waste would be sampled and screened by testing prior to storage. CTC believes this proposed activity would constitute short-term storage not subject to the Council's jurisdiction, and would not be a significant modification to the facility.

Robert K. Erling  
Senior Siting Analyst

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