



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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Petition No. 338HW
Logano Transportation Company, Inc.
Portland, Connecticut
Staff Report
April 25, 1995

On March 31, 1995, the Logano Transportation Company, Inc. (Logano) of Portland, Connecticut submitted a petition to the Connecticut Siting Council (Council) for a declaratory ruling that the recycling process proposed by Logano would be exempt from Council jurisdiction under General Statutes § 22a-117 because it would not dispose, treat, or perform long term storage of hazardous waste. Logano proposes to receive lead paint contaminated debris wood in roll-off containers, visually inspect the material, then take it to a chipping area on the site where the material would be fed into a mechanical chipper that would discharge into another roll-off container. The material will be held on site for a period not to exceed 10 days, and would then be transported to a recycling facility which would reclaim the lead from the paint. The chipping serves to reduce the overall size of the material to facilitate recycling of the lead. Therefore, no chemical change to the material would occur via this processing. The chipping unit and building in which the chipping would occur would be operated under negative air pressure in a totally enclosed structure to prevent fugitive air emissions. Air in the building would be exchanged every 15 minutes. An operations trailer with a high efficiency particulate air (HEPA) filtration system attached to the chipping unit would remove particulates during the operation via use of six dust collectors and a filter. Ambient air sampling would be performed here to ensure proper operation of the filtration system. Under a draft permit to operate a commercial waste recycling facility issued by the Department of Environmental Protection (DEP), released February 21, 1995, Logano must take two air samples per shift, including one personal sample and one at the discharge of the filtration system. Additionally, Logano would be required to ensure that Occupational Safety and Health Association (OSHA) standards for lead particulate exposure levels are not exceeded. Filter replacement and any other maintenance necessary would be implemented should the air samples for discharge air from the HEPA filtration unit exceed .05 mg/m³ for lead. Chipping could not resume until the particulate emission levels returned below this allowable limit. The air pollution control equipment would be tested prior to commencement of operations to ensure negative pressure. No lead paint contaminated debris would be left unchipped at the end of an operational shift.

After chipping, the debris would be placed in roll-off containers which meet U.S. Department of Transportation waste packaging specifications, marked and labeled to identify the contents. The roll-offs would be placed on an impervious surface, such as concrete or asphalt pavement. No waste would remain on the site for more than 10 days. All vehicles delivering and shipping this material would be covered or sealed in a manner that ensures no waste or waste residues are

released from the containers or the vehicle. Logano has been required by DEP to maintain a valid contract with a final recycling facility for receiving the chipped debris. If such a contract terminates, Logano could not accept any waste until a new contract with a lead reclamation facility is in place. Vehicles must use a direct route to and from the proposed Pickering Street facility which has been approved by the Town of Portland's Town Engineer.

Within 30 days after commencement of operations, Logano would be required to provide to the DEP a compliance report by an independent Health and Safety professional, documenting the operation and particulate monitoring.

The U.S. Environmental Protection Agency and the DEP have determined this facility would not fall under Resource Conservation and Recovery Act of 1976 (RCRA) Hazardous Waste facility regulations. The DEP has issued a tentative final determination and draft permit to operate a commercial waste recycling facility. The declaratory ruling of the Council is the final step required for the facility to obtain final authorization to operate.

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