

**From:** Bunnell, Ross <Ross.Bunnell@ct.gov>  
**Sent:** Friday, March 20, 2020 3:10 PM  
**To:** 'George.Vassallo@pfizer.com' <George.Vassallo@pfizer.com>  
**Subject:** FW: Compliance Question regarding COVID 19

George:

The issue of compliance with the 90-day accumulation time limits for hazardous waste generators has come to our attention, and we are currently coordinating with staff at EPA Headquarters and EPA Region 1 on this issue. This coordination may result in the formulation of some sort of temporary relief from the accumulation time requirement. If so, we will get back to you and advise you accordingly.

Until then, you have the option of requesting an extension of your accumulation time limit for up to 30 days as provided by RCSA Section 22a-449(c)-102(a)(2)(L) incorporating 40 CFR 262.34(b) with specified changes. This provision of the hazardous waste regulations allows DEEP to approve such requests when hazardous wastes must remain on-site for longer than 90 days due to “temporary, unforeseen, and unavoidable circumstances.”

If you wish to submit an extension request, you may do so by submitting a letter to us via email for our consideration. You can send such an email to our Division Director, Robert Isner, at [robert.isner@ct.gov](mailto:robert.isner@ct.gov). If it would be difficult for you to submit an actual letter (e.g., lack of access to the office to print out, sign, or scan a signed letter, etc.), you may submit your request for an extension via email, explaining why you are submitting it via email and why your circumstances meet the “temporary, unforeseen and unavoidable” criteria referenced above. DEEP understands the challenges arising from COVID-19, and will work with EPA and other states on appropriate relief that furthers the objective of protecting human health and the environment.

Regarding the weekly inspection requirement, there is no regulatory provision to address your situation like there is for the accumulation time limit extension described above. One option, if you can manage it, is to ship all of your 90-day accumulation waste off-site. If so, there would be no weekly inspections to conduct. Note that wastes in satellite accumulation areas need not be shipped off-site under this scenario, since they are not subject to hazardous waste inspection requirements. If this is not possible, and there is a period of time where there are no qualified staff at the site to conduct the weekly inspections, you can send us a letter requesting relief from the inspection requirement on a temporary basis for our consideration. As noted above, if it is difficult for you to submit an actual letter, you may submit an email instead. We understand the unique dilemmas that the current situation with the COVID-19 virus presents, and expect to accommodate requests such as this to the best of our ability.

Again, as noted above, we are coordinating with EPA on these kinds of issues, and will inform you of any developments coming down from EPA.

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**From:** Vassallo, George L <[George.Vassallo@pfizer.com](mailto:George.Vassallo@pfizer.com)>  
**Sent:** Thursday, March 19, 2020 12:33 PM  
**To:** Latham, Mark <[Mark.Latham@ct.gov](mailto:Mark.Latham@ct.gov)>; Bunnell, Ross <[Ross.Bunnell@ct.gov](mailto:Ross.Bunnell@ct.gov)>  
**Subject:** Compliance Question regarding COVID 19

Mark/Ross,

Good afternoon, I hope this email finds you well.

I working to make advance planning for my facility in the event that the current COVID 19 Pandemic requires quarantine. In the event that my site goes into a shuttered operation what will be expected of LQGs to continue weekly inspections and 90 day storage compliance?

I've dealt with a number of issues over my 30 + years with RCRA compliance, but this is a first.

Appreciate your feedback!

**George L. Vassallo, CHMM CDGP**

Manager, Regulated Waste Lead

Dangerous Goods Administrator

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