

Petition No. 1059HW
Tradebe Treatment and Recycling Northeast, LLC
Meriden, Connecticut
May 13, 2013

On April 5, 2013, the Connecticut Siting Council, (Council) received a petition from Tradebe Treatment and Recycling Northeast, LLC (TTRN) for a declaratory ruling that the addition of hazardous waste storage areas to its existing facility in Meriden would not require a Certificate of Public Safety and Necessity (Certificate). On May 8, 2013, Council members Brian Toal and Edward Wilensky and Council staff member Robert Mercier met with Rick Baker, Tradebe Environmental Manager, Bill Adorno, Plant Manager and Steve Dubauskas, Compliance Manager, at the TTRN facility at 136 Gracey Road, Meriden to discuss the petition.

TTRN's Meriden facility is a used oil and hazardous waste recycling, treatment, storage, and transfer facility in operation since 1976. A majority of the waste handled at the facility are used oils, fuels, and wastewaters. The facility is permitted by the Department of Energy and Environmental Protection (DEEP) in conjunction with the federal Resource Conservation and Recovery Act of 1976 (RCRA).

TTRN seeks to add one exterior hazardous waste storage area and one interior hazardous waste storage area to its existing facility. This would allow TTRN to expand hazardous waste reclamation services to its customers. TTRN has already obtained DEEP approval for the proposed expansion as a modification to its existing RCRA Part B hazardous waste permit. The Compliance schedule of the permit requires TTRN to submit the Council's declaratory ruling in this matter to DEEP within one year of the issuance of the permit dated September 18, 2012.

The proposed exterior hazardous waste storage area would be located north of the truck bays and west of the wastewater treatment building. The 45-foot wide by 86-foot long area is currently used as a non-hazardous container staging area. TTRN proposes to store up to four 30 cubic yard roll-off hazardous waste containers in this area. The hazardous waste, consisting of soil with fuels/metals contamination, would be in enclosed containers or open tops with tarp covers. The area has a concrete surface that drains into a catch basin. The catch basin is connected to an oil/water separator to collect wastes managed through an on-site storm management system which is under a separate DEEP Storm Water permit.

The proposed interior hazardous waste storage area would be located in TTRN's Liquid Recycling Facility on the west side of the TTRN facility. The area would be located in truck Bay 4, an area currently used to store up to 5,500 gallons of hazardous waste in 55 gallon drums for up to 48 hours, prior to shipment off-site. TTRN seeks to modify the storage area so that up to 16,400 gallons of hazardous waste can be kept for up to one year. Although the revised RCRA Part B permit would allow storage for up to one year, TTRN expects waste to be stored for one to two weeks prior to off-site shipment to appropriate disposal and reclamation facilities. TTRN contends the proposed modification is for short term storage, consistent with Connecticut General Statutes Section 22a-115 Definitions:

" (5) "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; and

" (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".

Furthermore, Connecticut General Statute Section 22a-117(b) states in part, "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." Therefore, no Certificate is required.