

**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



STATE OF CONNECTICUT

V.

THE CONARD CORPORATION

CONSENT ORDER # WSWDH10011

Date Issued: July 23, 2010

A. With the agreement of The Conard Corporation ("Respondent"), the Commissioner of Environmental Protection ("the Commissioner") finds:

1. Respondent is engaged in the manufacturing of metal parts using photo-etching technology at 101 Commerce Street, Glastonbury, Connecticut ("the site").
2. Respondent is or has been a generator of hazardous waste at the site.
3. Based on the findings of an inspection at the site on November 18, 2009, Respondent:
 - a) Failed to determine whether each of the wastes generated at the site is a hazardous waste as required by Section 22a-449(c)-102(a)(2)(A) of the Regulations of Connecticut State Agencies (RCSA), which incorporates by reference 40 CFR 262.11. Specifically, Respondent could not provide documentation of hazardous waste determinations for spent developer mixture stored in one 125-gallon tank at the time of the inspection.
 - b) Failed to review, and immediately amend the contingency plan when necessary pursuant to the provisions under 40 CFR 265.54 as required by 22a-449(c)-102(a)(2)(K) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(4) and 265.54. Specifically, the Department found that the contingency plan was not updated to reflect one 5,000-gallon aboveground hazardous waste storage tank installed in 2001.
 - c) Failed to maintain records with job titles, job descriptions and the name of each employee filling each position at the facility related to hazardous waste management as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(4) and 265.16(d)(1) and (2). The Department found training records lacking job title and job description for one employee with hazardous waste responsibilities, Mr. Arthur Long.
 - d) Failed to perform annual review of the personnel training as required in Section 22a-449(c)-102(a)(2)(k) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.16. Specifically, during the inspection, the Department found no documentation of training required of hazardous waste personnel for 2008 and 2009. Respondent had on file only OSHA training certifications for hazardous waste personnel completed in 2007, which do not fully satisfy RCRA personnel training requirements.

- e) Failed to implement measures to demonstrate the length of time that universal waste had been stored on site as required by Section 22a-449(c)-113(a)(1) of the RCSA, which incorporates by reference 40 CFR 273.15(c). Specifically, the Department found two boxes of spent fluorescent lights with no indication of duration of storage.
 - f) Failed to develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that is important to preventing, detecting, or responding to environmental or human health hazards as required by Section 22a-449(c)-102(b)(2) of the RCSA, which incorporates by reference 40 CFR 265.15(b)(1). Specifically, the Department found ancillary equipment for the hazardous waste tank system was not included in inspection schedule and log records.
 - g) Failed to obtain and keep on file written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirements to attest that the tank system was properly designed and installed and that repairs were performed as required by the RCSA Section 22a-449(c)-102(a)(2)(F), which incorporates by reference 40 CFR 262.34(a)(1)(ii) and 265.192(g). Specifically, the Department found records at the site lacked documentation of tightness test pursuant to 40 CFR 265.192(d) for approximately one 4,500-gallon hazardous waste tank system installed.
4. On February 1, 2010, the Department of Environmental Protection ("Department") issued Notice of Violation No. WSWDH10014 to the Respondent to correct violations corresponding to those listed in paragraphs A.3.a through A.3.g of this consent order.
5. Based on the documentation submitted by Respondent on December 18, 2009, March 2, March 5, March 26, March 28, April 19, and May 27, 2010, Respondent has corrected the violations corresponding to those listed in paragraphs A.3.a through A.3.g.
6. By virtue of the above, Respondent has violated Sections 22a-449(c)-102 through 119 of the RCSA, incorporating Title 40 of the CFR, Parts 262 through 279.
- B. With the agreement of Respondent, the Commissioner, acting under §22a-6, §22a-449, and §22a-131 of the Connecticut General Statutes, orders Respondent as follows:
- 1. Compliance Assurance. Respondent shall maintain its compliance with all applicable provisions of the Regulations of Connecticut State Agencies Sections 22a-449(c)-100, et. seq., including but not limited to those regulations applicable to generators of hazardous waste identified in paragraph A.3.a through A.3.g above in accordance with the following schedule:

- a. On or before **thirty (30) days** after issuance of this consent order, Respondent shall designate and assign an environmental compliance expert who may be a full-time employee of the Respondent, and/or retain one or more qualified consultants, acceptable to the Commissioner, to prepare the documents and implement or oversee the actions required by this consent order and shall, by that date, notify the Commissioner in writing of the identity of such environmental compliance expert and/or consultants. Respondent shall assign such environmental compliance expert and/or retain such qualified consultant, acceptable to the Commissioner, until paragraph B.1 of this consent order is fully complied with, and, within **ten (10) days** after assigning or retaining any environmental compliance expert or consultant for the purpose of addressing the actions required by this consent order, other than one originally identified under this paragraph, Respondent shall notify the Commissioner in writing of the identity of such other environmental compliance expert or consultant. Respondent shall submit to the Commissioner a description of the assigned environmental compliance expert's and/or consultant's education, experience and training which is relevant to the work required by this consent order within **ten (10) days** after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable environmental compliance expert or consultant unacceptable.
 - b. On or before **thirty (30) days** after issuance of this consent order, Respondent shall submit for the Commissioner's review and written approval, a plan detailing additional actions and/or operational changes it has undertaken or will undertake to ensure future compliance with the Connecticut's hazardous waste management regulations RCRA Sections 22a-449 (c)-100, et. Seq., including, but not limited to, those set forth in paragraph A.3.a. through A.3.g. of this consent order. Within **five (5) days** after the Commissioner approves such plan, Respondent shall carry out the plan and maintain it in full effect thereafter.
 - c. On May 27, 2010, the Respondent submitted, for the Commissioner's review and written approval, a Business Recycling Profile documenting the Respondent's management of recyclable materials. Refer to the enclosed "Business Recycling Profile" (Attachment A).
2. Full compliance: Respondent shall not be considered in full compliance with this consent order until all actions required by this consent order have been completed as approved and to the Commissioner's satisfaction.
 3. Status of Notice of Violation No. WSWDH10014: This consent order supersedes Notice of Violation No. WSWDH10014.
 4. Civil penalty: On or before **fourteen (14) days** after issuance of this consent order, Respondent shall pay a penalty of **three thousand five hundred dollars (\$3,500)** as the total civil penalty to be sought by the Commissioner for those, and only those, violations described in paragraphs A.3.a through A.3.g of this consent order.

5. Payment of penalties: Payment of penalties under this consent order shall be mailed or personally delivered to the Department of Environmental Protection, Bureau of Administration, Accounts Receivable Office, 79 Elm Street, Hartford, CT 06106-5127, and shall be by certified or bank check payable to "Treasurer, State of Connecticut".

The check shall state on its face, "Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, civil penalty, consent order No. **COWSWDH 10011**". A copy of the check shall be mailed or delivered to Julie Dutton, Bureau of Materials Management and Compliance Assurance, at the same address.

6. Supplemental Environmental Project: In addition to the civil penalty referenced in paragraph B.4., Respondent has agreed to undertake the following supplemental environmental project ("SEP") requiring an expenditure of at least **eight thousand dollars (\$8,000)**, which is the minimum total estimated cost as determined by the Commissioner for the SEP required under this paragraph, or make payment(s) as follows:

- a. Respondent shall perform the SEP identified and described in Attachment B to this consent order. Respondent shall perform such SEP in accordance with the schedule approved by the Commissioner, and shall obtain any federal, state or local permit or approval necessary to carry out such SEP.
- b. If Respondent fails to fully perform any SEP in accordance with subparagraph B.6.a., Respondent shall immediately notify the Commissioner in writing of such noncompliance and shall, upon written request by the Commissioner, remit a payment equal to the total estimated cost, as determined by the Commissioner of all such SEP(s), plus **\$2,500 (for a total of \$10,500)**. Within **fourteen (14)** days after the date of the Commissioner's written request, Respondent shall make such payment in accordance with the remittance procedures for unexpended SEP funds in paragraph B.5. ("Payment of penalties.") of this consent order.
- c. On or before **thirty (30)** days after completion of the SEP, Respondent shall submit for the Commissioner's review and written approval a comprehensive final report that certifies completion of such SEP. Such final report shall include, at a minimum, a narrative history of the project, detailed explanation of its design and implementation, summary of any data collected, complete final accounting of actual project costs including receipts for out-of-pocket costs, and a discussion of environmental benefits resulting from the SEP.
- d. Should the Commissioner determine that the actual cost to the Respondent of any fully completed SEP is less than the estimated cost, as determined by the Commissioner, of such SEP, Respondent shall pay the difference between such actual cost and the estimated cost to the Commissioner as unexpended SEP funds. The Commissioner shall notify the Respondent in writing of the amount of any such unexpended SEP funds that are due. Respondent shall, within **fourteen (14)** days after the date of such written notice, remit the full amount of the unexpended SEP funds. Payment of unexpended SEP funds shall be made in accordance with the instructions detailed in paragraph B.5. ("Payment of penalties.") above.

- e. If and when Respondent disseminates any publicity, including but not limited to any press releases regarding funding a SEP, Respondent shall include a statement that such funding is in partial settlement of an enforcement action brought by the Commissioner.
- f. Respondent shall not claim or represent that any SEP payment made pursuant to this consent order constitutes an ordinary business expense or charitable contribution or any other type of tax deductible expense, and Respondent shall not seek or obtain any other tax benefit such as a tax credit as a result of the payment under this paragraph.

7. Sampling and sample analyses: All sampling and sample analyses which are required by this consent order and all reporting of such sample analyses shall be conducted by a laboratory certified by the Connecticut Department of Public Health to conduct such sampling and analyses. All sampling and sample analyses performed under this order shall be performed in accordance with procedures specified or approved in writing by the Commissioner, or, if no such procedures have been specified or approved, in accordance with EPA document SW-846. Unless otherwise specified by the Commissioner in writing, the value of each parameter shall be reported to the maximum level of precision and accuracy specified in the applicable protocol, and if no such level is specified, to the maximum level of precision and accuracy possible.

8. Approvals: Respondent shall use best efforts to submit to the Commissioner all documents required by this consent order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within **thirty (30) days** of the Commissioner's notice of deficiencies. In approving any document or other action under this consent order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this consent order. Nothing in this paragraph shall excuse noncompliance or delay.

9. Definitions: As used in this consent order, "Commissioner" means the Commissioner or a representative of the Commissioner.

10. Dates: The date of "issuance" of this consent order is the date the consent order is deposited in the U.S. mail or personally delivered, whichever is earlier. The date of submission to the Commissioner of any document required by this consent order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this consent order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is deposited in the U.S. mail or is personally delivered, whichever is earlier. Except as otherwise specified in this consent order, the word "day" as used in this consent order means calendar day. Any document or action which is required by this consent order to be submitted or performed by a date which falls on a Saturday, Sunday or a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.

11. Certification of documents: Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this consent order shall be signed by Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in §22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and Respondent or Respondent's chief executive officer and each such individual shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."

12. Noncompliance: This consent order is a final order of the Commissioner with respect to the matters addressed herein, and is non-appealable and immediately enforceable. Failure to comply with this consent order may subject Respondent to an injunction and penalties.

13. False statements: Any false statement in any information submitted pursuant to this consent order may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.

14. Notice of transfer; liability of Respondent: Until Respondent has fully complied with this consent order, Respondent shall notify the Commissioner in writing no later than **fifteen (15) days** after transferring all or any portion of the facility, the operations, the site or the business which is the subject of this consent order or after obtaining a new mailing or location address. Respondent's obligations under this consent order shall not be affected by the passage of title to any property to any other person or municipality.

15. Commissioner's powers: Except as provided hereinabove with respect to payment of civil penalties, nothing in this consent order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for past, present, or future violations of law. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this consent order have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondent to undertake further investigation or further action to prevent or abate violations or pollution.

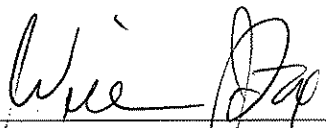
16. Respondent's obligations under law: Nothing in this consent order shall relieve Respondent of other obligations under applicable federal, state and local law.

17. No assurance by Commissioner: No provision of this consent order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by Respondent pursuant to this consent order will result in compliance or prevent or abate pollution.
18. Access to site: Any representative of the Department of Environmental Protection may enter the site without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this consent order.
19. No effect on rights of other persons: This consent order neither creates nor affects any rights of persons or municipalities that are not parties to this consent order.
20. Notice to Commissioner of changes: Within **fifteen (15) days** of the date Respondent becomes aware of a change in any information submitted to the Commissioner under this consent order, or that any such information was inaccurate or misleading or that any relevant information was omitted, Respondent shall submit the correct or omitted information to the Commissioner.
21. Notification of noncompliance: In the event that Respondent becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this consent order or of any document required hereunder, Respondent shall immediately notify by telephone the individual identified in the next paragraph and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. Within **five (5) days** of the initial notice, Respondent shall submit in writing the date, time, and duration of the noncompliance and the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and Respondent shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondent shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
22. Submission of documents: Any document required to be submitted to the Commissioner under this consent order shall, unless otherwise specified in this consent order or in writing by the Commissioner, be directed to:

Evelyn Silva, Environmental Analyst
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
Department of Environmental Protection
79 Elm Street
Hartford, Connecticut 06106-5127

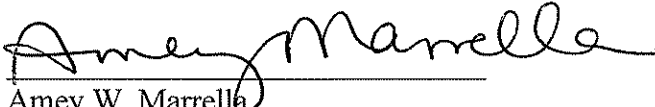
Respondent consents to the issuance of this consent order without further notice. The undersigned certifies that he/she is fully authorized to enter into this consent order and to legally bind the Respondent to the terms and conditions of the consent order.

THE CONARD CORPORATION

BY: 
William Fox, President

July 7, 2010
Date

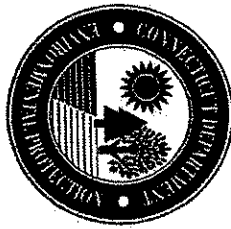
Issued as a final order of the Commissioner of the Department of Environmental Protection.


Amey W. Marrella
Commissioner

7/22/10
Date

Consent Order No.: WSWDH10011

Attachment A



Business Recycling Profile

In Connecticut recycling is mandatory. Connecticut General Statutes and the Regulations of Connecticut State Agencies require designated items to be recycled by **everyone**. Every resident, business, government facility, school, college, hospital, institution, etc. is required by law to recycle glass & metal food and beverage containers, corrugated cardboard, newspaper, white office paper (except from a residential property), scrap metal, Ni-Cd rechargeable batteries, used crankcase oil, lead acid batteries, leaves and grass clippings.

Recycling these items is a critical action we can all take to move the State towards achieving our recycling rate of 58% by 2024 as stated in the amended December 2006 CT State Solid Waste Management Plan. Complying with the state recycling laws has tremendous environmental benefits such as conserving natural resources, reducing pollutants emitted to our air and water, conserving energy, reducing greenhouse gas emissions, and eliminating the need for new solid waste disposal facilities.

This form is a guidance document to help businesses better manage their recycling program and increase recovery efforts. This form does not need to be submitted to DEP unless it is requested, in response to an inspection and/or an enforcement action. For more recycling resources please visit our Business Recycling Resources webpage.

Part I: Company Information

- | | | | |
|---|--|------------------|------------------------|
| 1. Company Name: CONRAD CORP. | City/Town: GASTONBURY | State: CT | Zip Code: 06033 |
| Mailing Address: PO BOX 676 | Title: SUR | | |
| 2. Recycling Contact: PAUL CICHOWICZ | Email: MAINTENANCE@CONRADCORP.COM | | |
| Phone(s): 860-659-0591 | Title: ENG. MGR | | |
| 3. Additional Contact: TOMMY MURTHA | Email: ENGINEERING@CONRADCORP.COM | | |
| Phone(s): 860-659-0591 | | | |

Part II: Facility/Operations

- | | |
|---|---|
| 1. Type of business: MANUFACTURING | 4. Acreage of lawn area: < 1300 SQ FT |
| 2. Number of buildings: 1 | 5. Number of employees: 20 |
| 3. Total square footage of building(s) 13000 | |

Part II: Facility/Operations (continued)

6. Current solid waste/recycling hauler(s):

Name: **WINDSOR SANITATION**

Name:

Name:

Phone: **860-688-3955**

Phone:

Phone:

☐ Check here if additional sheets are necessary, and label and attach them to this sheet.

7. Building Owner:

FOX FINANCIAL

Mailing Address:

SAME AS CANTON CT 06030

City/Town:

State:

Zip Code:

Phone:

Email: **FOX WJ FOX @ AOL.COM**

All Businesses Are Required to Recycle:

High Grade White Office Paper (HGWO): White copy paper, computer paper, office stationery, memo paper, etc.

Old Corrugated Cardboard(OCC): Old or discarded corrugated boxes – Not waxed

Old Newspaper (ONP): Used or discarded newspapers

Glass & Metal Food and Beverage Containers (including 5¢ deposit containers)

Leaves: Foliage which has fallen from trees must be recycled

Used Crankcase Oil: Used crankcase oil from internal combustion engines

Lead Acid Storage Batteries: Used batteries from cars, airplanes, boats, tractors, etc.

Scrap Metal: Used or discarded items which consist predominantly of metals such as iron, aluminum, brass, copper, lead, chromium, tin, nickel, etc. or alloys of these metals, including but not limited to appliances.

Rechargeable Batteries: Nickel-cadmium (NiCd) rechargeable batteries, both those contained within appliances and those sold individually are required to be recycled after they no longer are usable.

Grass Clippings: Best practice is to recycle grass by leaving grass clippings on the lawn.

In addition to the state mandated recyclables listed above, check your **local ordinances** to learn about additional materials your business may be required to recycle including plastic bottles.

58% by 2024

Part III: Company's Current Recycling & Recovery Efforts

Please use the table below to describe your company's current recycling program. Attachments of photos or other documents are also accepted if you are requested to submit this form.

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (If you do not have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: OFFICE PAPER (White and other paper combined)	One 40-gallon wheeled cart/week	Everyone collects at their desk, brought to central location (large wheeled cart near elevators). Janitor brings to loading dock when it is full (about once a week)	Our current trash hauler, (XYZ) Trash Hauling, Windsor, CT, empties our paper recycling wheeled cart 2x/month (we call them as-needed) and material is taken to the ABC recycling facility in (Name of Town).
Office paper (white paper)**	c. 150 LBS / MO	WASTE BASKET AT EACH WORK STATION - EMPTIED WEEKLY BY MAINT CONTRACTOR (MC)	96-GAL OIL DRUMS - WINDSOR SUSTAINABLE (WS)
Newspaper**	c. 15 LBS / MO	DAILY LUNCH ROOM - EMPTIED WEEKLY BY MC	96-GAL OIL DRUMS - WS
Other paper or mixed paper (please list types here) WHITE BLOTTER PAPER *TISSUE	c. 180 LBS / MO	REUSED MULTIPLE TIMES, THEN RECYCLED AS WHITE PAPER	(SEE OLE PAPER)

** Mandatory item that everyone is required to recycle in Connecticut.

Part III: Company's Current Recycling & Recovery Efforts (continued)

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Old Corrugated Cardboard	We have a 4-yard dumpster behind our main warehouse. It's picked up twice a week.	Warehouse staff collect and flatten boxes as we go along. A small pile is created during a shift (we have 3 shifts/day). At the end of the shift an employee removes the small pile and brings to dumpster outside.	Our current trash hauler, (PQ Trash Hauling, City, CT) empties cardboard dumpster Mondays and Thursdays.
Corrugated cardboard**	200 LBS / MO	REUSED WHERE POSSIBLE - UNREUSABLE COLLECTED DAILY IN WORK AREAS - EMPTIED BY OUR STAFF	2 YARD ON BELMONT - WS
Food and beverage containers (check all those collected for recycling) <input checked="" type="checkbox"/> Glass** <input checked="" type="checkbox"/> Metal** <input checked="" type="checkbox"/> Plastic <input checked="" type="checkbox"/> Paper carton or (juice-type) box	10 LBS / WEEK	LUNCH ROOM DAILY - EMPTIED WEEKLY - MC	QB EAT AND BELMONT - WS
Other Tower CALT Ridges	1 EVERY 3 MOS	GENERAL OFFICE	MAILED TO MFR.

** Mandatory item that everyone is required to recycle in Connecticut

Part III: Company's Current Recycling & Recovery Efforts (continued)

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Printer Toner cartridges	We have 8 printers in our offices and generally replace/recycle 1/month	Office manager returns all toner cartridges to Office Supply Store for a credit towards future office supplies	Use mailer envelopes that come with new toner. We mail them back to Office supply store (or they pick up with new deliveries).
Lead Acid Storage Batteries (car, truck, boat)**	N/A		
Rechargeable Batteries**	0-10 LBS	COLLECTED BY OUR STAFF AS NEEDED	TAKEN TO LOCAL AMMUNITION RECYCLE DRIVE
Used Crankcase Oil**	N/A		
Scrap Metal**	VARIES BY ALLOY	COLLECTED BY ALLOY IN REC'D	ALBERT BROS - WTBV ON DEMAND

** Mandatory item that everyone is required to recycle in Connecticut

Part III: Company's Current Recycling & Recovery Efforts (continued)

MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (if you don't have weight data enter the number, and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
<i>EXAMPLE: Leaves and other yard debris</i>	N/A	Our landscape company (NAME, TOWN) mows our lawns and maintains our entry garden. They remove all the materials (although grass clippings are left on the lawn).	Our landscape company takes them away.
Leaves**	N/A		
Grass clippings**	0	RECYCLED INTO LAWN	
Brush, stumps and other yard debris	N/A		

** Mandatory item that everyone is required to recycle in Connecticut

Part III: Company's Current Recycling & Recovery Efforts (continued)

MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
Food waste	N/A		
Other			
Other			

Part IV Company's Current Waste Reduction, Reuse And Other Recovery Programs

WASTE REDUCTION, REUSE AND OTHER RECOVERY PROGRAMS	PROJECT DESCRIPTION
EXAMPLE: Waste Reduction	Our cafeteria recently began using reusable trays and washing them instead of using Styrofoam trays which we were throwing away. We have also instituted a reusable mug program (providing a free mug to employees) to try and reduce the amount of coffee cup waste.
Waste Reduction	WASTE PAPER CONSUMPTION REDUCTION BY GREATER USE OF ELECTRONIC MEDIA
Waste Reduction	
Other	
EXAMPLE: ReUse	Our company generates approximately 10 used Gaylord containers /week that we donate to Foodshare for their produce distribution program. We also donate over-stock and discontinued building supplies to the ReCONstruction Center in New Britain.
ReUse	
ReUse	
Other	
Other	

Part V: Recycling & Recovery Programs Planned

Please use the table below to describe future recycling efforts and how compliance with the mandatory items, if not already recovered for recycling, will be achieved.

IDEA / MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIAL BE COLLECTED?	WHO WILL PICK-UP THIS MATERIAL? FINAL/END MARKET?	WHEN WILL PROGRAM BE IMPLEMENTED?
EXAMPLE: Food and Beverage containers (glass, metal and plastic)	25 gallons/month	Will place barrel in break room, janitorial staff will empty and remove materials to a larger container on our loading dock.	There are a lot of 5¢ deposit containers. We're looking into having a local non-profit organization collect them for free and redeem the deposits.	We will start this program by August 8, 2008 (2 weeks from now).
EXAMPLE: 55 gallon drums	10/week	We generate 55 gallon drums, which contained non-hazardous substances. We stockpile them outside the plant until we have 50 drums.	Working with XYZ, a company that recconditions the drums. We've found this to be more cost effective than recycling them at this time.	We've already started collecting and expect our first pick up to be next week (June 5, 2008)
WHITE PAPER	c. 150 LBS/MO			MOVING TO KEEP MORE & MAKE REDDITS ON EEE. MEYMA

Part V: Recycling & Recovery Programs Planned (continued)

IDEA / MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIAL BE COLLECTED?	WHO WILL PICK-UP THIS MATERIAL? FINAL/END MARKET?	WHEN WILL PROGRAM BE IMPLEMENTED?
EXAMPLE: 5 gallon buckets	15-30 buckets/month	We generate buckets (contained non-hazardous substances) and cannot use them. Will rinse and stack (with lids) off to side of loading dock.	We're trying to secure a connection with a local reuse center or distribute via materials exchange program.	We hope to start this program by the end of August 2008.

Reminder: This form is only required to be submitted when requested by DEP.

When requested by DEP, please include photos of your recycling bins and containers and any copies of recycling/waste contract. If you have additional pages or items to help explain/show successes in your waste recycling/recovery efforts, please attach those as well including brochures, flyers, employee educational materials, etc.

When requested by DEP, please submit the completed form and all Supporting Documents to:

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF MATERIALS MANAGEMENT & COMPLIANCE ASSURANCE
WASTE ENGINEERING AND ENFORCEMENT DIVISION
79 ELM STREET, 4TH FLOOR
HARTFORD, CT 06106-5127

PHONE: (860) 424-3365

Attachment B

The Conard Corp Proposed SEP for DEP Consideration

Overview

Conard proposes as an SEP that we install a Water Recycling System that will reduce the amount of city water we use and also reduce the amount of treated waste water we discharge to the City of Glastonbury. Regarding the "DEP Policy on SEP" we feel we are satisfying 2 criteria, "#1 Pollution Prevention Projects" and "#2 Pollution Reduction/Waste Minimization Projects".

*At present Conard discharges about 3,600 gallons per day through our Waste Water Treatment System. We have identified approximately 1,000 gallons per day for specific machine water flow rates where the rinse water could be recycled instead of discharged to the city sewer system. This is about *28% of our daily water usage and discharge. We feel this should qualify our SEP for Category #2 because this would "further reduce the amount of pollution that would otherwise be discharged into the environment"*

In most instances we require DI quality water for our production processes but we have identified 4 pieces of production equipment that do not require DI quality. These are our rinse chambers for our production etchers. Each etcher has a cascading rinse that we will be able to recycle water to. Each rinse chamber uses about .05 gpm. This equates to about 1,000 gpd we could reduce both our city water usage and our discharge to the city sewer system.

I would add that these rinses are the primary rinses that require waste treatment prior to discharge as they are metal bearing rinses. I have attached a DMR form March of 2010 to show the typical metals that are contained in the discharge waters that we treat. We feel that by recycling these specific rinse waters we will actually reduce the percent of metals in our discharge waters to the city sewer. This should qualify our SEP for Category #1 Pollution Prevention Projects, because there would be a "source reduction".

How the purchased equipment will be implemented

I have attached an estimate from L & T for the cost of a turnkey system. Because of limited floor space we will have to purchase a tank stand, on the stand we will have a 300 gallon holding tank with a liquid level controller. The system will also have a pump control panel to control the recycled water feeds to the designated etch rinses.

The plan is to pump water from the final discharge tank on our Waste Treatment System to the 300 gallon holding tank, once the tank meets the maximum level the liquid level control

will shut off the feed to the tank. As called for the pump control panel will pump the recycled water to the appropriate etch rinse equipment.

Time line

The time line for installation of the L & T equipment will be 90 days ARO. Once the system is in place Conard maintenance employees would have to plumb from the system to each individual etch rinse equipment, we estimate that this would take about 30 days.

System Cost

As mentioned previously I have attached a cost for the L & T System. Once the system is in place Conard will have the added cost of purchasing and installing ancillary plumbing to the required equipment and the subsequent labor it takes to install the plumbing.

L & T System @ \$10,900.00

Conard Plumbing Cost @ 1,000.00

Conard Labor Hour Cost @ 700.00

Total Cost @ 12,600.00 to install system

Cost Savings to Conard

Conard's estimated water bill is about \$2,700 annually. Based on an annual reduction of *28% as mentioned above, Conard would save about \$864.00 per annum in water usage.

Conard's estimated annual Town sewer fee is about \$3,200.00. Based on an annual reduction of 28% of water discharge, Conard would save about \$896.00 per annum in Town sewer usage.

The combined annual savings is estimated to be \$1,760.00.

Recovery of Investment from savings (Payback)

Based on total cost of the system and installation cost to Conard of 12,600.00 and the annual savings of water usage and Town sewer discharge fees totaling 1,760, it will take a little over 7 years to payback the investment.



Arthur Long, General Manager, Conard Corp, Glastonbury, CT July 1, 2010



LT TECHNOLOGIES INC.



612 Plymouth Street
East Bridgewater, MA 02333
Phone: 508-586-9972
Fax: 508-456-0316

Date:
6/28/2010
Quote Number
3046

Prepared for: CONARD CORP.
101 Commerce Street
Glastonbury, CT 06033
Attn: Art Long

Recycle Equipment

- 1 300-Gallon Tank, 42" dia. X 55" high, HDPE Construction
- 1 Steel Constructed Tank Stand, approx. 96" tall, designed for a 3000 lb. load, Epoxy coated.
- 1 Polypro Corrosion Resistant 1/2 HP Transfer Pump
- 1 Tank Liquid Level Controller
- 1 Pump Control Panel

Total Material Cost \$ 10,900.00

Price includes piping and valves for pump.

Note: Transfer piping to point of use is by others.

FOB: East Bridgewater, MA 02333

DELIVERY:

6 - 8 Weeks

PAYMENT TERMS:

50% At Placement of Order

50% Net 30-Days After Delivery

STATE OF CONNECTICUT ** DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Water Management - Discharge Monitoring Report

Print: 12-01-08

PERMIT: SP0000239 SIG

DIST: CI TOWN: 054 LOC: 024

Facility: CONARD CORPORATION, THE

Contact: ARTHUR LONG

TOWN: GLASTONBURY

PHONE: 860-659-0591

 * DATE RECEIVED (STAMPED) *
 * * * * *
 * Logged Entered Quid *
 * * * * *

KEY: SP0000239 ISSUE: 120205

EXPIRE: 120110

GPD

Discharge: 001 1 Mon Loc: 1

Average Flow: NO AVG
METAL FINISHING

SAMPLE MONTH: MARCH 2010

SAMPLE WEEKS:

3/19

CODE	START	S/M	TYP	UNIT	PARAMETER	MINIMUM	AVERAGE	MAXIMUM	FREQ	1	2	3	4	5
01105	120205	0/0	G	MG/L	ALUMINUM, TOTAL (as Al)	XXXXXXXXXX	0.051	0.051	* 01/30					
01032	120205	0/0	CP	MG/L	CHROMIUM, HEXAVALENT (as	XXXXXXXXXX	<0.01	<0.01	* 01/30					
01034	120205	0/0	CP	MG/L	CHROMIUM, TOTAL (as Cr)	XXXXXXXXXX	0.001	0.001	* 01/30					
01043	120205	0/0	CP	MG/L	COPPER, TOTAL (as Cu)	XXXXXXXXXX	0.012	0.012	* 01/30					
74076	120108	0/1	DF	GPD	FLOW, DAY OF SAMPLING	XXXXXXXXXX	4730	4730	* 01/30					
50047	120108	0/1	DF	GPD	FLOW, MAXIMUM DURING 24 H	XXXXXXXXXX	4730	4730	* 1/1					
01045	120205	0/0	G	MG/L	IRON, TOTAL (as Fe)	XXXXXXXXXX	0.011	0.011	* 01/30					
01067	120205	0/0	CP	MG/L	NICKEL, TOTAL (as Ni)	XXXXXXXXXX	0.018	0.018	* 01/30					

At the frequency required in the discharge permit, include either the result of analyses for TIO or initial the following statement:

Based on my inquiry of the person or persons responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report which required such certification. I further certify that this facility is implementing the solvent management plan approved by the commissioner.

C0115 120205 0/0 RDM SU

PH MONTHLY

6.0 XXXXXXXX 9.4 * 1/1

00530 120205 0/0 G MG/L

SOLIDS, TOTAL SUSPENDED

XXXXXXXXXX XXXXXXXX <5.0 * 01/30

25.0

PAGE 2

STATE OF CONNECTICUT ** DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Water Management - Discharge Monitoring Report

Print: 12-01-08

KEY: SP0000239 ISSUE: 120205 EXPIRE: 120110
Discharge: 001 1 Mon Loc: 1
AVERAGE FLOW: NO AVG GPD
METAL FINISHING

SAMPLE MONTH: MARCH 2010

SAMPLE WEEKS:

3/19

1

CODE	SYRT	S/M	TYP	UNIT	PARAMETER	MINIMUM	AVERAGE	MAXIMUM	FREQ	1	2	3	4	5
01092	120205	0/0	CP	MG/L	ZINC, TOTAL (as Zn)	XXXXXXX	<u>0.162</u>	<u>0.162</u>	*	01/30		<u>0.162</u>		