

Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

STATE OF CONNECTICUT
V.
THE DRAWN METAL TUBE COMPANY

CONSENT ORDER no. COWSWDH11008

Date Issued: September 16, 2011

A. With the agreement of The Drawn Metal Tube Company ("Respondent"), the Commissioner of Energy and Environmental Protection ("the Commissioner") finds:

1. Respondent is a Connecticut corporation, which is or has been engaged in the activity of resizing brass, nickel, and silver metal tubing at 219 Elm Street, Thomaston, Connecticut ("the site").
2. Respondent is or has been a generator of hazardous waste at the site.
3. Based on an inspection conducted by the *Department of Energy and Environmental Protection ("DEEP"), Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, on October 15, 2009, Respondent:
 - a. Failed to perform hazardous waste determinations on all solid waste being generated at the facility as required by section 22a-449(c)-102(a)(1) of the Regulations of Connecticut State Agencies ("RCSA"), incorporating Title 40 of the Code of Federal Regulations ("40 CFR") 265.11.
 - b. Failed to ensure that containers of hazardous waste were being stored with adequate aisle space that would allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.35.

* Public Act 11-80, effective July 1, 2011, established the Department of Energy and Environmental Protection as the successor agency to the Department of Environmental Protection.

- c. Failed to mark containers of hazardous waste with the date upon which accumulation began, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(2).
- d. Failed to ensure that satellite accumulation containers were closed except when adding or removing wastes, as required by section 22a-449(c)-102(a)(2)(M) of the RCSA, incorporating 40 CFR 262.34(c)(1)(i) and 265.173(a).
- e. Failed to ensure that containers of hazardous waste were being stored on a surface that was sufficiently impervious, as required by section 22a-449(c)-102(a)(2)(E) of the RCSA, incorporating 40 CFR 262.34(a)(1)(i) and 264.175(b)(1).
- f. Failed to record all inspections of the container storage area in a log or summary, as required by section 22a-449(c)-102(b)(2) of the RCSA, incorporating 40 CFR 265.15(d).
- g. Failed to submit copies of the facility's contingency plan to all local police, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.53(b).
- h. Failed to ensure that all personnel involved in hazardous waste management had successfully completed a program of classroom instruction or on the job training to ensure that they were properly trained in hazardous waste management procedures and were able to respond effectively to emergencies, as required by section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 40 CFR 265.16(a).
- i. Failed to provide an annual review of initial hazardous waste training, as required by section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.16(c).
- j. Failed to keep records demonstrating that current and former employees of the facility had successfully completed a program of classroom instruction or on-the-job training that taught them hazardous waste management procedures, as required by section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.16(e).

- k. Failed to maintain a written description of the type and amount of hazardous waste training provided to employees at the facility, as required by section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.16(d)(3).
- l. Disposed of universal waste in violation of section 22a-449(c)-113(a)(1) of the RCSA, incorporating 40 CFR 273.11(a).
- m. Failed to remedy any deterioration or malfunction found during inspections, as required by section 22a-449(c)-102(b)(2) of the RCSA, incorporating 40 CFR 265.15(c).

4. On January 26, 2010, the DEEP issued Notice of Violation no. WSWDH10013 to the Respondent requiring correction of the violations listed in subparagraphs A.3.a. through A.3.m. of this consent order.

5. Based on observations made at the end of the October 15, 2009 inspection, Respondent has corrected the violation cited in subparagraph A.3.d. of this consent order.

6. Based on review of documentation Respondent submitted to the DEEP dated October 27, 2009, Respondent has corrected the violation listed in subparagraph A.3.c. of this consent order.

7. Based on documentation Respondent submitted to the DEEP dated April 9, 2010, Respondent has corrected the violations listed in subparagraphs A.3.b., A.3.e., and A.3.f. of this consent order.

8. Based on documentation Respondent submitted to the DEEP dated April 29, 2010 Respondent has corrected the violation listed in subparagraphs A.3.l. of this consent order.

9. Based on documentation Respondent submitted to the DEEP dated May 20, 2010 Respondent has corrected the violations listed in subparagraphs A.3.a., and A.3.j. of this consent order.

10. Based on documentation Respondent submitted to the DEEP dated August 16, 2010, violations listed in subparagraphs A.3.g., A.3.h., A.3.i., A.3.k., and A.3.m. of this consent order will be addressed, and future violations prevented, by Respondent's maintenance of its status as a small quantity generator of hazardous waste.

11. By agreeing to the issuance of this consent order, Respondent makes no admission of fact or law with respect to the matters addressed herein, other than the facts asserted in paragraph A.1. of this consent order.
- B. With the agreement of Respondent, the Commissioner, acting under sections 22a-6, 22a-131, and 22a-449 of the Connecticut General Statutes (“CGS”), orders Respondent as follows:
 1. Compliance. Respondent shall maintain its compliance with all applicable provisions of Connecticut’s hazardous waste management regulations, sections 22a-449(c)-100 through 119 of the RCSA.
 - a. On or before thirty (30) days after issuance of this consent order, Respondent shall 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 consultant(s), or shall submit documentation to the Commissioner demonstrating that qualified in-house expertise exists 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 in-house expert(s). Respondent shall retain one or more qualified consultants or in-house experts, acceptable to the Commissioner until this Consent Order is fully complied with and within ten (10) days after retaining any consultant or in-house expert other than one originally identified under this paragraph, Respondent shall notify the Commissioner in writing of the identity of such other consultant or in-house expert. Respondent shall submit to the Commissioner a description of a consultant’s or in-house expert’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 prevent the Commissioner from finding a previously acceptable consultant or in-house expert unacceptable.
 - b. On or before sixty (60) days after issuance of this consent order, Respondent shall submit for the Commissioner’s review and written approval a plan detailing all actions and/or operational changes it has or will undertake to ensure compliance with the hazardous waste management requirements specified in paragraph A.3. of this consent order, and all applicable provisions of the hazardous waste management regulations, section 22a-449(c) of the RCSA, et.seq. The plan shall detail the provisions made by the Respondent to maintain its status as a small quantity generator of hazardous waste. Within five (5) days after the Commissioner approves such plan in writing, Respondent shall operate its facility in accordance with the terms and conditions of the plan approved by the Commissioner and maintain it in full effect thereafter.

- c. Respondent shall conduct a comprehensive recycling review of its operations to evaluate compliance with Connecticut's recycling laws set forth in CGS section 22a-241b(d). On or before ninety (90) days after the date of issuance of this consent order, Respondent shall submit for the Commissioner's review and written approval a business recycling profile documenting the management of recyclable materials. An example profile is included as attachment A to this consent order.
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. WSWDH10013. This consent order supersedes Notice of Violation no. WSWDH10013.
4. Civil penalty. Respondent shall pay a penalty of six thousand, eight hundred dollars (\$6,800⁰⁰) as the total civil penalty to be sought by the Commissioner for those, and only those violations described in paragraph A.3. of this consent order. The penalty shall be paid in three separate installments as follows:
 - a. The first installment shall be in the amount of two thousand, two hundred and sixty-seven dollars (\$2,267⁰⁰) and shall be due and payable on or before fourteen (14) days from the date of issuance of this consent order.
 - b. The second installment shall be in the amount of two thousand, two hundred and sixty-seven dollars (\$2,267⁰⁰) and shall be due and payable on or before ninety (90) days from the date of issuance of this consent order.
 - c. The third installment shall be in the amount of two thousand, two hundred and sixty-six dollars (\$2,266⁰⁰) and shall be due and payable on or before one hundred and eighty (180) days from the date of issuance of this consent order.
5. Payment of civil penalty. Payment of the penalty required under this consent order shall be mailed or personally delivered to the Department of Energy and Environmental Protection, Bureau of Financial and Support Services, 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" and include the consent order number identified at the top of page one of this consent order. Copies of the check and any transmittal letter shall also be sent to Julie Dutton in the Bureau of Materials Management and Compliance Assurance at the same address.

6. Supplemental Environmental Projects. In lieu of making the third civil penalty payment prescribed in paragraph B.4. above, Respondent may comply with the requirements of subparagraph B.6.a. below regarding supplemental environmental projects ("SEP").

a. Performance of SEP(s)

(1) On or before ninety (90) days after the date of issuance of this consent order, Respondent shall submit for the Commissioner's review and written approval a proposal to perform one or more SEPs ("proposal"), according to the Department's February 15, 1996 "Policy on Supplemental Environmental Projects". The proposal shall include:

- i. a detailed description of each SEP,
- ii. itemized costs to be incurred by Respondent in carrying out each SEP,
- iii. documentation to support such cost estimates,
- iv. an explanation as to why each SEP is being proposed,
- v. a proposed schedule (of not more than 180 days) for implementation and completion of each SEP, and
- vi. a description of the benefit of each SEP to the general public or the environment. Respondent shall be credited up to two thousand, two hundred and sixty-six dollars (\$2,266⁰⁰) to partially fund any SEPs.

(2) The Commissioner will either:

- i. approve the proposal, including in such approval the dollar amount of the penalty offset to be realized by Respondent attributable to the SEP(s) and any additional conditions deemed necessary by the Commissioner; or
- ii. disapprove the proposal and notify Respondent, in writing, of deficiencies in the proposal and any additional actions or information required to be taken or supplied by Respondent.

The decision to approve or disapprove an SEP shall be in the sole discretion of the Commissioner.

- (3) If the dollar amount of the penalty offset attributable to the approved SEP(s) is less than two thousand, two hundred and sixty-six dollars (\$2,266⁰⁰), Respondent shall pay the difference in accordance with a revised schedule established by the Commissioner.
- (4) Respondent shall not be given any credit, or reduction in the civil penalty provided for by this paragraph if an SEP included in an approved proposal is not fully complied with. If Respondent fails to fully perform any SEP approved in accordance with paragraph B.6.a.(2).i., 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 either \$2,500 or 10% of such total estimated cost, whichever is greater. Respondent shall make such payment in accordance with the remittance procedures for unexpended SEP funds in subparagraph B.6.a.(10). of this consent order.
- (5) The net present after-tax value of the SEP(s) shall be equivalent to the sum(s) identified in this paragraph or Respondent shall submit certified documentation that no tax credits shall be obtained as a result of the SEP(s) performed under this paragraph.
- (6) If and when Respondent disseminates any publicity, including but not limited to any press releases regarding funding an SEP, Respondent shall include a statement that such funding is in partial settlement of an enforcement action brought by the Commissioner.
- (7) 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.
- (8) On or before thirty (30) days after completion of each SEP, Respondent shall submit for the Commissioner's review and written approval a comprehensive final report that certifies completion of each SEP. Such final report shall include, at a minimum:
 - i. a narrative history of the project,
 - ii. detailed explanation of its design and implementation,
 - iii. summary of any data collected,

- iv. complete final accounting of actual project costs including receipts for out-of-pocket costs, and
- v. a discussion of environmental benefits resulting from each SEP.

(9) Should the Commissioner determine that the actual cost to Respondent in completing an SEP is less than the estimated cost identified in the proposal approved by the Commissioner in accordance with paragraph B.6.a.(2).i, Respondent shall pay the difference between such actual cost and estimated cost to the Commissioner as unexpended SEP funds. The Commissioner shall notify Respondent in writing of the amount of any such unexpended SEP funds which are due.

(10) 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 by certified or bank check payable to "Treasurer, State of Connecticut" and the check shall state on its face "Statewide SEP Account" and include the consent order number identified at the top of page one of this consent order. Any payment shall be made in accordance with paragraph B.5. of this consent order.

7. Sampling and sample analyses. All 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 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 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 Respondents' chief executive officer or a duly authorized representative of such officer, as those terms are defined in section 22a-430-3(b)(2) of the RCSA, and by the individual(s) responsible for actually preparing such document, 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 section 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 nonappealable 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 section 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.
18. Access to site. Any representative of the Department of Environmental Protection may enter the facility 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 they 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:

Brent Madho
Department of Energy and Environmental Protection
Bureau of Materials Management & Compliance Assurance
Waste Engineering and Enforcement Division
79 Elm Street
Hartford, Connecticut 06106-5127

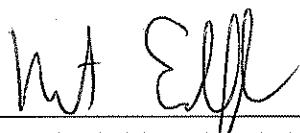
[Left blank intentionally]

The Drawn Metal Tube Company
Consent Order

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 Drawn Metal Tube Company

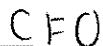
BY:



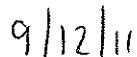
(Signature of the individual with authority to bind The Drawn Metal Tube Company to the terms of this consent order)



Name (typed)

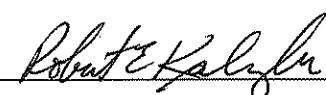
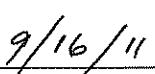


Title



Date

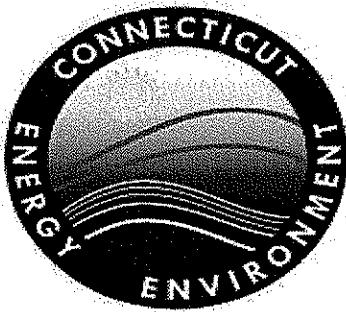
Issued as a final order of the Commissioner of Energy and Environmental Protection.


for Daniel C. Esty Robert E. Kaliszeuski
Commissioner Director, Planning & Program Development
Date

Consent Order

Drawn Metal Tube Company
Consent Order

ATTACHMENT A



Business Recycling Profile

CT DEEP, Bureau of Materials Management & Compliance Assurance

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 DEEP 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](#).

All Businesses Are Required to Recycle:

High Grade White Office Paper (HGWOP) 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

Company Information

Company Name: _____

Address: _____

Recycling Contact: _____

Title: _____

Phone(s): _____

Email: _____

Additional Contact: _____

Title: _____

Phone(s): _____

Email: _____

Facility/Operations

Type of business: _____

Number of buildings, total square footage of building(s): _____

Acreage of lawn area: _____

Number of employees: _____

Current solid waste/recycling hauler(s) (Name/Phone): _____

Building Owner: _____

Mailing Address: _____

Phone: _____

Email: _____

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 also accepted.

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: 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)**			
Newspaper**			
Other paper or mixed paper (please list types of paper in your 'other' paper mix)			

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

CT DEEP – Bureau of Materials Management & Compliance Assurance

RECYCLABLE MATERIAL	(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, (P&G Trash Hauling, City, CT) empties cardboard dumpster Mondays and Thursdays.
Corrugated cardboard**			
Food and beverage containers (check all those collected for recycling)	<input type="checkbox"/> Glass** <input type="checkbox"/> Metal** <input type="checkbox"/> plastic <input type="checkbox"/> paper carton or (juice-type) box		
Other			

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

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)**			
Rechargeable Batteries**			
Used Crankcase Oil**			
Scrap Metal**			

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

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: Leaves and other yard debris	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**			
Grass clippings**			
Brush, stumps and other yard debris			

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

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

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

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 Reduction	
Other	
Other	

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

WASTE REDUCTION, REUSE AND OTHER RECOVERY PROGRAMS	PROJECT DESCRIPTION
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	

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

Recycling & Recovery Programs Planned

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

IDEA/MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIALS 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 reconditions 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).

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

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EXAMPLE: 5 gallon buckets	15-30 buckets/month	We generate buckets (<u>contained</u> 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.

Attachments: 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.

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

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