

Connecticut Department of

**ENERGY &
ENVIRONMENTAL
PROTECTION**

STATE OF CONNECTICUT

v.

BIEDERMANN MANUFACTURING INDUSTRIES INCORPORATED

CONSENT ORDER no. COWSWDH11009

Date Issued: November 4, 2011

- A. With the agreement of Biedermann Manufacturing Industries Incorporated. (“Respondent”), the Commissioner of Energy and Environmental Protection (“the Commissioner”) finds:
1. Respondent is a Connecticut corporation, with a business address of 135 South Main Street, Thomaston, Connecticut (“the site”).
 2. Respondent is or has been engaged in the manufacturing of precision screw machine products at the site.
 3. Respondent is or has been a generator of hazardous waste at the site.
 4. Based on an inspection conducted by the *Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, on March 30, 2010, 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”) 262.11.
 - b. Disposed of universal waste, namely, waste fluorescent lamp bulbs, in violation of section 22a-449(c)-113(a)(1) of the RCSA, incorporating 40 CFR 273.11(a).
 - c. Failed to submit a generator biennial report for 2009, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.41(a).

* 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.

- d. Stored hazardous waste at the site for greater than ninety (90) days without having obtained a hazardous waste storage permit or interim status, in violation of section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a).
- e. Failed to mark containers of hazardous waste with the words "Hazardous Waste" and a description of their contents, such as the chemical name, as required by section 22a-449(c)-102(a)(2)(J) of the RCSA, incorporating 40 CFR 262.34(a)(3), with specified changes.
- f. 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).
- g. Failed to obtain a written tank integrity assessment, reviewed and certified by a qualified registered professional engineer, of a new (i.e., installed after January 12, 1987) hazardous waste storage tank, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(1)(ii) and 265.192(a).
- h. Failed to test the new tank system for tightness prior to it being placed in use, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(1)(ii) and 265.192(d).
- i. Failed to record the inspector's full name on an inspection log or summary, as required by section 22a-449(c)-102(b)(2) of the RCSA, incorporating 40 CFR 265.15(d).
- j. Failed to record the time of inspections on the facility's inspection log, as required by section 22a-449(c)-102(b)(2) of the RCSA, incorporating 40 CFR 265.15(d).
- k. Failed to submit copies of the facility's contingency plan to all local police and 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).
- l. Failed to include in the contingency plan a list of all safety and emergency equipment and their locations, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.52(e).

- m. Failed to provide an annual review of initial hazardous waste training, as required by section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(4) and 265.16(c).
 5. On June 2, 2010, the Department of Energy and Environmental Protection (“DEEP”) issued Notice of Violation no. WSWDH10055 to the Respondent requiring correction of the violations listed in paragraphs A.4.a. through A.4.m. of this consent order.
 6. Based on documentation Respondent submitted to the DEEP dated August 30, 2010, December 17, 2010, Respondent has corrected violations A.4.a. and A.4.d. through A.4.m. of this consent order.
 7. 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 and A.2.
- 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 correct the violation identified in paragraph A.4.c. and A.4.m. above and shall maintain its compliance with all applicable provisions of Connecticut’s hazardous waste regulations, sections 22a-449(c)-100 through 119 of the RCSA, including but not limited to those regulations applicable to generators of hazardous waste identified in paragraph A.4. above. In particular:
 - 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 perform all actions which it failed to perform as specified in paragraph A.4.c. and A.4.m. of this consent order.
 - c. 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.4. of this consent order, including how the Respondent intends to manage its waste fluorescent lamp bulbs, and all applicable provisions of the hazardous waste management regulations, RCSA section 22a-449(c), et.seq. 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.
 - d. 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(c). 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. WSWDH10055. This consent order supersedes Notice of Violation no. WSWDH10055.
 4. Civil penalty. Respondent shall pay a penalty of eighteen thousand, one hundred and thirty dollars (\$18,130.00) as the total civil penalty to be sought by the Commissioner for those, and only those violations described in paragraph A.4. of this consent order.
 5. Payment of civil penalty. The civil penalty imposed by paragraph B.4. of this consent order shall be payable through the allowance in Respondent's Chapter 11 bankruptcy proceeding No. 10-09207-8-SWH, pending in the United States Bankruptcy Court for the Eastern District of North Carolina, Wilson Division, of an unsecured claim in favor of the Commissioner in the amount of eighteen thousand, one hundred and thirty dollars \$18,130.00, and through the distribution, if any, on said allowed unsecured claim.
 6. 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.

7. 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.
8. Definitions. As used in this consent order, "Commissioner" means the Commissioner or a representative of the Commissioner.
9. 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.
10. 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.”

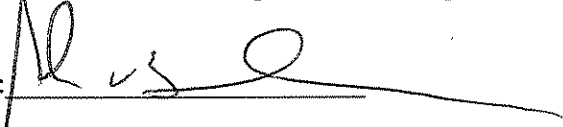
11. Noncompliance. This consent order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this consent order may subject Respondent to an injunction and penalties.
12. False statements. Any false statement 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.
13. 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.
14. 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.
15. Respondent’s obligations under law. Nothing in this consent order shall relieve Respondent of other obligations under applicable federal, state and local law.
16. 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.

17. Access to site. Any representative of the Department of Energy and 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.
18. 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.
19. 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.
20. 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.
21. 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

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.

Biedermann Manufacturing Industries Incorporated.

BY: 

(Signature of the individual with authority to bind Biedermann Manufacturing Industries Incorporated to the terms of this consent order)

John W. Biedermann

Name (typed)

President

Title

10/24/11

Date

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



FDR Daniel C. Esty
Commissioner

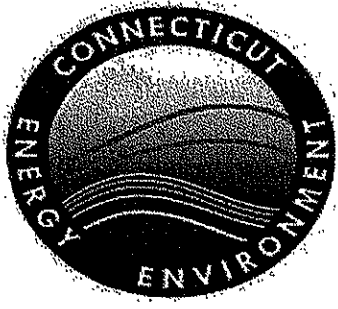
* Department Energy and Environmental Protection

*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.

11/3/11
Date

ATTACHMENT A.

Business Recycling Profile



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.

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
<p>EXAMPLE: Old Corrugated Cardboard</p>	<p>We have a 4-yard dumpster behind our main warehouse. It's picked up twice a week.</p>	<p>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.</p>	<p>Our current trash hauler, (P&E Trash Hauling, City, CT) empties cardboard dumpster Mondays and Thursdays.</p>
<p>Corrugated cardboard**</p>			
<p>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</p>			

**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
<p>EXAMPLE: Printer Tower cartridges</p>	<p>We have 8 printers in our offices and generally replace/recycle 1/month</p>	<p>Office manager returns all tower cartridges to Office Supply Store for a credit towards future office supplies</p>	<p>Use mailer envelopes that come with new tower. We mail them back to Office supply store (or they pick up with new deliveries).</p>
<p>Lead Acid Storage Batteries (car, truck, boat)**</p>			
<p>Rechargeable Batteries**</p>			
<p>Used Crankcase Oil**</p>			
<p>Scrap Metal**</p>			

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

MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACHMONTH (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.

CT DEEP – Bureau of Materials Management & Compliance Assurance

MATERIAL	AVG WEIGHT (Indicate tons or pounds) COLLECTED FOR RECYCLING EACHMONTH (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			
Other			
Other			

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

WASTE REDUCTION, REUSE AND OTHER RECOVERY PROGRAMS	PROJECT DESCRIPTION
<p>EXAMPLE: Waste Reduction</p>	<p>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.</p>
<p>Waste Reduction</p>	
<p>Waste Reduction</p>	
<p>Other</p>	
<p>Other</p>	

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

WASTE REDUCTION, REUSE AND OTHER RECOVERY PROGRAMS	PROJECT DESCRIPTION
<p>EXAMPLE: Reuse</p>	<p>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.</p>
<p>Reuse</p>	
<p>Reuse</p>	
<p>Other</p>	
<p>Other</p>	

*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?
<p>EXAMPLE: Food and beverage containers (glass, metal and plastic)</p>	<p>25 gallons/month</p>	<p>Will place barrel in break room; janitorial staff will empty and remove materials to a larger container on our landing dock.</p>	<p>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.</p>	<p>We will start this program by August 8, 2008 (2 weeks from now).</p>
<p>EXAMPLE: 55 gallon drums</p>	<p>10/week</p>	<p>We generate 55 gallon drums, which contained non-hazardous substances. We stockpile them outside the plant until we have 50 drums.</p>	<p>Working with XYZ, a company that recoupons the drums. We've found this to be more cost effective than recycling them at this time.</p>	<p>We've already started collecting and expect our first pick up to be next week (June 5, 2008)</p>

**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: 5 gallon buckets	15-30 buckets/month	We generate buckets (containing non-hazardous substances) and cannot use them. Will reuse 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.

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

Last Updated: September 14, 2011