



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

STATE OF CONNECTICUT

V.

GREEN MONSTER eCYCLING LLC

CONSENT ORDER # WSWDH12002

Date Issued: March 29, 2012

A. With the agreement of Green Monster eCycling LLC ("Respondent"), the Commissioner of Energy and Environmental Protection ("the Commissioner") finds:

1. Respondent is engaged in the collection, storage and disassembly of used electronics and other universal wastes at 150 Brook Street, West Hartford, Connecticut ("the site").
2. Respondent is or has been a generator of hazardous waste at the site.
3. On February 22, 2010, Respondent received Approval of Registration under General Permit for Disassembly of Used Electronics under General Permit No. DUE-155-012 ("General Permit"). This permit had an expiration date of August 11, 2011. The Department reviewed the permit on October 21, 2011 and is currently reviewing the Respondent's registration application.
4. Based on the findings of inspections conducted at the site on May 27, 2011 and June 9, 2011, Respondent:
 - a) Failed to ensure that the Final Closure Plan and Cost Estimate includes cost of disposal of all used electronics and components of used electronics, in violation of section 5(a)(1)(D) of the General Permit issued on February 22, 2010. Specifically, the cost estimate in the closure plan covers a monthly maximum of five (5) tons of used electronics for closure of the facility. However, the volume of used electronics noted at the time of inspection was significantly higher.
 - b) Failed to establish an appropriate surety or other financial assurance mechanism in an amount sufficient to cover the cost of third party closure of the site consistent with the Final Closure Plan and Cost Estimate, in violation of Section 5(a)(12) of the General Permit. Specifically, the certificate of deposit currently in place for final closure (\$4,538), is an inappropriate financial assurance mechanism and the amount is inadequate for closure of the facility.
 - c) Failed to label used electronics received at the facility with the words "used electronics", "universal waste - used electronics" or "waste used electronics", in violation of Section 22a-449(c)-113(d)(1)(E) of the Regulations of Connecticut State Agencies ("RCSA"), incorporating 40 CFR 273, subpart C, with specified changes, and Section 5(a)(8) of the General Permit. Specifically, the Department found no labeling or markings identifying the following: a) numerous Gaylord boxes and pallets; b) two roll-offs; c) one box truck staged in the western parking lot of 150 Brook Street; d) a large amount of uncontainerized used electronics staged directly on the ground; and e) several piles of uncontainerized used electronics (over 30ft(l) x 30ft (w) x 10ft(h)) located within the warehouse of mostly uncontainerized used electronics located near the loading/receiving docks.

- d) Failed to ensure that used electronics are managed in accordance with Connecticut's Standards for Large Quantity Handlers of Used Electronics as described in Section 22a-449(c)-113(d) of the RCSA, incorporating 40 CFR 273.35(c) and in violation of Section 5(a)(4) of the General Permit. Specifically, accumulation dates were not consistently marked in all areas where used electronics and components thereof, were stored at the time of the inspection.
- e) Failed to ensure that disassembled used electronics (printed circuit boards) are managed in accordance with the Universal Waste requirements of Section 22a-449(c)-113 of the RCSA, in violation of Section 5(a)(14)(B)(iii) of the General Permit. Specifically, numerous printed circuit boards were scattered on the floor of the disassembly area.
- f) Failed to maintain disassembly area and ensure that all materials generated from the disassembly of used electronics are placed in appropriate storage containers, as specified by subparagraph 5(a)(14)(B), and also regularly sweep or otherwise clean each disassembly area so as to ensure that such areas do not accumulate dust, pieces of plastic, wires/cords or other debris, in violation of Section 5(a)(14)(C) of the General Permit.
- g) Failed to include all required information in the Facility Site Plan in accordance with Section 5(a)(1)(A) of the General Permit. Specifically, the Respondent failed to:
 - i. ensure Facility Site Plan includes drawings or map(s) showing property boundaries of the site using an A-2 survey in violation of Section 5(a)(1)(A)(v) of the General Permit;
 - ii. ensure the Facility Site Plan includes drawings or map(s) showing existing and proposed buffer zones to adjacent properties, streams, and surface waters, tidal wetlands, dunes, beaches, bluffs or escarpments, in violation of Section 5(a)(1)(A)(vi) of the General Permit;
 - iii. ensure the Facility Site Plan includes drawings or map(s) showing utilities, in violation of Section 5(a)(1)(A)(ix) of the General Permit;
 - iv. ensure the Facility Site Plan includes drawings or map(s) showing the location of access control, in violation of Section 5(a)(1)(A)(xi) of the General Permit; and
 - v. ensure the Facility Site Plan shows fire control facilities, in violation of Section 5(a)(1)(A)(xii) of the General Permit.
- h) Failed to ensure the Facility Description includes an organizational chart and a description of duties and responsibilities of operating personnel, in violation of Section 5(a)(1)(B)(ii) of the General Permit.
- i) Failed to ensure the Emergency and Preparedness Plan in the Operations and Management ("O&M") Plan includes emergency procedures for a spill, fire, flood, etc., and the emergency equipment to be utilized, in violation of Section 5(a)(1)(C)(ii) of the General Permit.
- j) Failed to ensure the Facility Process Flow Diagram includes the process names and rates or capacities, the ultimate disposal of all materials, and wastes shipped off-site, including non-hazardous treatment residues, in violation of Section 5(a)(1)(C)(iii) of the General Permit.

- k) Failed to prepare and maintain on-site an O&M Plan that meets the requirements of Section 5(a)(1)(C)(vi) of the General Permit. Specifically, at the time of the inspection Respondent did not have:
 - i. an inspection schedule available for review identifying which items would be inspected, the frequency of inspection(s), and the types of problems to be reviewed during each inspection.
 - ii. logs used and maintained for each inspection; and
 - iii. maintenance procedures with a minimum daily cleanup procedure; procedures and equipment to control dust, noise, litter and vectors; processing equipment inspection and maintenance; and a preventative maintenance shutdown program.
- l) Failed to submit to the local fire department, police department and hospital a copy of the facility's Emergency and Preparedness Plan, in violation of Section 5(a)(2) of the General Permit.
- m) Failed to revise and update required plans whenever facility or operational changes occur, in violation of Section 5(a)(3) of the General Permit. Specifically, facility description was not revised to reflect that Respondent occupies approximately 19,000 sq. ft. of office and warehouse space; not 8,000 sq. ft. which is described in the current facility description.
- n) Failed to design, operate, maintain, repair the facility in conformance with the requirements of the General Permit, in violation of Section 5(a)(6) of the General Permit. Specifically, the company was not operating in conformance with the General Permit.
- o) Failed to store all used electronics inside a building with a roof and four walls or in the cargo carrying portion of a truck, in a manner that prevents used electronics from being exposed to the environment, in violation of Section 22a-449(c)-113(d)(1)(B) of the RCSA and Section 5(a)(7) of the General Permit. Specifically, Respondent has stored substantial quantities of used electronics outdoors and on the ground.
- p) Built or established a solid waste facility where more than ten cubic yards of solid waste including, but not limited to household appliances including refrigerators/freezers, microwave ovens, air conditioners, humidifiers/dehumidifiers, electric heaters, vacuums and lamps and office furniture, generated elsewhere, was transferred or disposed of after July 1, 1971, without a plan, design and method of operation of such solid waste facility having been filed with the Department and approved by the Commissioner by the issuance of a permit to construct a solid waste facility as required by the RCSA Sections 22a-209-2, 22a-209-4, and 22a-209-9, and Connecticut General Statutes (CGS) Sections 22a-208a(b) and 22a-208c.

5. On August 5, 2011, the Department received a complaint alleging the Respondent's workers were dismantling air conditioner units, refrigerator units and printers outdoors in which liquids were being drained to the ground (freon and ink from printer cartridges) in the 150 Brook Street site parking lot (complaint #11-143). An investigation of the allegations was conducted on August 5, 2011 and based on the findings, the Respondent:

- a) Failed to manage universal wastes in compliance with the requirements of section 22a-449(c)-113 of the RCSA, incorporating 40 CFR 273.1(b) with specified changes. Universal wastes that are not managed in compliance with the requirements of section 22a-449(c)-113 of the RCSA shall be managed in compliance with sections 22a-449(c)-100 to 119 inclusive, of the RCSA. At the time of the inspection, hazardous wastes eligible to be managed as universal wastes, specifically, used batteries, used fluorescent lamps, and used batteries, were not being managed as such. Therefore, Respondent was found to be managing hazardous wastes at the site.
- b) Failed to manage universal waste in a way that prevents the release of a component of universal waste to the environment as required by section 22a-449(c)-113 of the RCSA, which incorporates by reference 40 CFR 273.33(a) for universal waste batteries; 40 CFR 273.33(d) for universal waste lamps; RCSA Section 22a-449(c)-113(b) for used electronics. Specifically, the Department found:
 - i. two used lead-acid car batteries stored outdoors on the loading dock ramp and one wet lead-acid battery stored outdoors (upside down) on bare soil near the loading dock at the western side of the building;
 - ii. an open 55-gallon steel drum stored outdoors with approximately a dozen waste lamps (four-foot and eight-foot mercury-containing lamps) and two cardboard boxes of mercury-containing lamps;
 - iii. approximately five CRT-televisions, fifteen computer monitors and two LCD flat-screen monitors were found littered outdoors on bare soil, many of which were face down. Components of used electronics such as a computer keyboard and a television remote were noted to be in the dumpster and copier toner stains to the ground were also observed during the inspection.
- c) Failed to mark or label universal wastes at the site as required by Section 22a-449(c)-113 of the RCSA, which incorporates by reference 40 CFR Section 273.34. Specifically, the Department found no markings or labels on used batteries, used fluorescent lamps, and used electronics at the facility.
- d) Failed to store all used electronics inside a building with a roof and four walls or in the cargo carrying portion of a truck, in a manner that prevents used electronics from being exposed to the environment, in violation of Section 5(a)(7) of the General Permit.
- e) Failed to maintain an inventory system or any method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste as required by Section 22a-449(c)-113(d) of the RCSA, which incorporates by reference 40 CFR 273.35. Specifically, no accumulation dates were found in any of the areas in which used batteries, used mercury-containing lamps or used electronics were being stored at the time of the inspection.
- f) 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 RCSA, which incorporates by reference 40 CFR 262.11, with specified changes. Specifically, the Department found used electronics computer peripherals discarded in the trash, including a computer keyboard, a television remote and printer toner cartridge releases to the ground.

6. On August 11, 2011, the Department issued Notice of Violation No. WSWDH11064 to the Respondent to correct violations corresponding to those listed in paragraphs A.4.a through A.4.p and A.5.a through A.5.f of this consent order.

7. Based on the documentation received by the Department on September 26, 2011, Respondent has not demonstrated the violations listed in paragraphs A.4.a through A.4.p and A.5.a through A.5.f have been corrected.

8. By virtue of the above, Respondent has violated the provisions under Section 5(a) of the General Permit and 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-131, §22a-225, §22a-226 and §22a-449 of the Connecticut General Statutes, orders Respondent as follows:

1. Compliance Assurance. Respondent shall correct all outstanding violations set forth in paragraphs A.4.a through A.4.p and A.5.a through A.5.f of this consent order, and maintain its compliance with all applicable provisions of the General Permit and RCSA Sections 22a-449(c)-100, et. seq., including but not limited to those regulations applicable to generators of hazardous waste identified in paragraphs A.4.a through A.4.p and A.5.a through A.5.f above in accordance with the following schedule:

- a. Respondent has identified Darlene A. Chapdelaine, of Action Consulting & Associates, LLC, as an in-house environmental compliance expert, who is acceptable to the Commissioner, to prepare the documents and implement or oversee the actions required by this consent order. Respondent shall retain an in-house environmental compliance expert or a qualified environmental consultant acceptable to the Commissioner until this consent order is fully complied with. Within **ten (10) days** after retaining any in-house environmental compliance expert other than the one originally identified under this paragraph, or retaining an independent environmental consultant for the purposes of compliance with this paragraph, Respondent shall notify the Commissioner in writing of the identity of such other expert or consultant. Respondent shall submit to the Commissioner a description of the expert's/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 in-house expert or consultant unacceptable.
- b. On or before **sixty (60) days** after issuance of this consent order, Respondent shall perform all actions that it failed to perform as specified in paragraphs A.4.a through A.4.p and A.5.a through A.5.f of this consent order, and submit for the Commissioner's review and written approval a report which details the actions taken to comply with the regulations cited in this paragraph and documentation demonstrating such actions.
- c. On or before **ninety (90) 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 General Permit and Connecticut's hazardous waste management regulations RCSA Sections 22a-449 (c)-100, et. Seq., including, but not limited to, those set forth in paragraphs A.4.a through A.4.p and A.5.a through A.5.f 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.

- d. On or before **ninety (90) days** after the date of issuance of this consent order, Respondent shall conduct a comprehensive recycling review of the facility to evaluate compliance with Connecticut's recycling laws set forth in CGS section 22a-241b(c). Respondent shall submit for the Commissioner's review and written approval a business recycling profile documenting the management of recyclable materials. Refer to the enclosed example profile shown as attachment A to this consent order.
- e. On or before **one hundred and twenty (120) days** after the date of issuance of this consent order, Respondent shall notify the Department in writing of intention to obtain a solid waste transfer facility permit. Until such time that Green Monster applies and is approved for such permit, Respondent agrees to accept materials only authorized by the General Permit. Respondent agrees not to accept any unpermitted solid waste, including but not limited to "white goods" such as refrigerators, stoves, air conditioners, floor/table lamps, lawn mowers or other solid wastes.

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. WSVDH11064:** This consent order supersedes Notice of Violation No. WSVDH11064.

4. **Civil penalty for violations:** After issuance of this consent order, Respondent shall pay a civil penalty of **thirty three thousand dollars (\$33,000.00)** as the total civil penalty to be sought by the Commissioner for those, and only those, violations described in paragraph A.4.a through A.4p and A.5a. through A.5.f of this consent order. **Eight (8)** payments shall be made as follows:

- a. The first installment of **three thousand dollars (\$3,000.00)** shall be due on or before April 1, 2012.
- b. The second installment of **three thousand dollars (\$3,000.00)** shall be due on or before July 1, 2012.
- c. The third installment of **three thousand dollars (\$3,000.00)** shall be due on or before October 1, 2012.
- d. The fourth installment of **three thousand dollars (\$3,000.00)** shall be due on or before January 1, 2013.
- e. The fifth installment of **five thousand dollars (\$5,000.00)** shall be due on or before April 1, 2013.
- f. The sixth installment of **five thousand dollars (\$5,000.00)** shall be due on or before July 1, 2013.
- g. The seventh installment of **five thousand dollars (\$5,000.00)** shall be due on or before October 1, 2013.
- h. The eighth installment of **six thousand dollars (\$6,000.00)** shall be due on or before January 1, 2014.

5. Payment of penalties: Payment of penalties under this consent order shall be mailed or personally delivered to the Department of Energy and 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 12002". 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. 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.

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 **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.

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 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."

11. 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.

12. 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.

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 or prevent or abate pollution.

17. Access to site: Any representative of the Department of Energy and 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.

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 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.

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:

Evelyn Silva, Environmental Analyst 2
Connecticut Department of Energy and Environmental Protection
Bureau of Materials Management and 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.

GREEN MONSTER eCYCLING LLC

BY:

Joseph Galiatsatos, President

3.15.12
Date

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

Macky McCleary, Deputy Commissioner

3/27/12
Date

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:
Mailing Address:
City/Town: _____ State: _____ Zip Code: _____
2. Recycling Contact:
Phone(s): _____ Title: _____ Email: _____
3. Additional Contact:
Phone(s): _____ Title: _____ Email: _____

Part II: Facility/Operations

1. Type of business:
2. Number of buildings:
3. Total square footage of building(s)
4. Acreage of lawn area:
5. Number of employees:

Part II: Facility/Operations (continued)

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

Name:

Name:

Name:

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

7. Building Owner:

Mailing Address:

Phone:

City/Town:

State: Zip Code:

Email:

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.

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)**			
Newspaper**			
Other paper or mixed paper (please list types here)			

** 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**			
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

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 mail 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

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

MATERIAL	Avg Weight (indicate tons or pounds)	Who picks-up material and where is the material taken for recycling
	Collected for recycling each month	
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)
Leaves**		Our landscape company takes them away
Grass clippings**		
Brush, stumps and other yard debris		

** 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)	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
	COLLECTED FOR RECYCLING EACH MONTH		
Food waste			
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 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	<i>Will place barrel in break room, Janitorial staff will empty and remove materials to a larger container on our loading dock.</i>	<i>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.</i>	<i>We will start this program by August 8, 2008 (2 weeks from now).</i>
EXAMPLE: 55 gallon drums	10/week	<i>We generate 55 gallon drums, which contained non-hazardous substances. We stockpile them outside the plant until we have 50 drums.</i>	<i>Working with XYZ a company that reconditions the drums. We've found this to be more cost effective than recycling them at this time.</i>	<i>We've already started collecting and expect our first pick up to be next week (June 5, 2008)</i>

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 (<u>contained</u> <u>non-hazardous substances</u>) and <u>cannot use them</u> . <u>Will rinse and stack (with lids) off to side of loading dock</u>	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

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