



**STATE OF CONNECTICUT**

**V.**

**PETER B. CURA & SONS, INC. AND  
MRJ, LLC**

**CONSENT ORDER # WSWDH15006**

**Date Issued:** September 25, 2015

- A. With the agreement of Peter B. Cura & Sons, Inc. ("Respondent PBC&S") and MRJ, LLC ("Respondent MRJ") (collectively referred to as the "Respondents"), the Commissioner of Energy and Environmental Protection ("the Commissioner") finds:
1. Respondent PBC&S is a corporation, which is or has engaged in a motor vehicle junkyard business at 1460 Echo Lake Road in Watertown, Connecticut ("the site").
  2. Respondent MRJ is the owner of the real property known as 1460 Echo Lake Road in Watertown, Connecticut.
  3. Respondent PBC&S is or has been a generator of hazardous waste.
  4. Staff from the Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division ("WEED") conducted an inspection at the site on October 21, 2014. Based upon the inspection, WEED found that Respondent PBC&S failed to comply with the following:
    - a. Determine whether each waste generated at the site is a hazardous waste as required by Section 22a-449(c)-102(a)(2)(A) of the Regulations of Connecticut State Agencies ("RCSA"), which incorporates by reference Title 40 of the Code of Federal Regulations ("40 CFR") 262.11 with specified changes. Specifically, hazardous waste determinations are needed for the soil stained area (30' x 30') as described in the inspection report.
    - b. Determine whether the total halogen content of each used oil generated is less than, greater than or equal to 1,000 ppm as required by Section 22a-449(c)-119(b)(1)(A) of the RCSA. Specifically, the company was giving other nearby facilities its used oil to burn in their furnaces without first conducting a total halogen content test.
    - c. Provide secondary containment for each storage area, and for each tank or container used to store greater than fifty-five (55) gallons of used oil as required by Section 22a-449(c)-

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119(b)(2)(A) of the RCSA. Specifically the following tanks and drums were not provided with secondary containment:

- i. two 275-gallon aboveground storage tanks located outside the building; and
    - ii. four 55-gallon drums located near a former dismantling area.
  - d. Label or mark clearly the tanks and containers containing used oil described in paragraph A.4.c. with the words "Used Oil" as required by Section 22a-449(c)-119(a)(1) of the RCSA, which incorporates 40 CFR 279.22(c).
  - e. Label or clearly mark universal waste batteries with any of the following phrases: "Universal Waste-Battery(ies), or "Waste Battery(ies)," or Used Battery(ies), as required by Section 22a-449(c)-113(a)(1) of the RCSA, which incorporates by reference 40 CFR 273.14(a).
5. Respondents established a solid waste facility where more than 10 cubic yards of solid waste including, but not limited to, tires, were disposed of after July 1, 1971, without a plan, design and method of operation of such solid waste facility having been filed with DEEP and approved by the Commissioner by the issuance of a permit to construct and operate a solid waste facility as required by Sections 22a-209-2, 22a-209-4, 22a-209-7, and 22a-209-8 of the RCRA; and Section 22a-208a(b) and 22a-208c of the Connecticut General Statutes ("CGS"). Specifically, a pile of scrap tires located at the back of the property estimated to be approximately 125 feet long by 25 feet wide by 8 feet high, must be removed and disposed at a permitted facility.
6. The Commissioner has not issued a solid waste facility permit for the site.
7. On January 5, 2015 WEED issued Notice of Violation No. WSWDH15001 to Respondent PBC&S to correct the violations corresponding to those cited in paragraphs A.4. and A.5. of this consent order.
8. By virtue of the above, Respondents have violated Sections 22a-208a(b) and 22a-208c of the CGS and Sections 22a-449(c)-102; 113, 119; 22a-209-2, 22a-209-4, 22a-209-7, and 22a-209-8 of the RCSA.
9. In correspondence dated February 3<sup>rd</sup>, April 7<sup>th</sup>, April 27<sup>th</sup> May 6<sup>th</sup> and June 19<sup>th</sup>, Respondent PBC&S represented that the violations identified in paragraphs A.4.b. through A.4.e. of this consent order has been resolved.
- B. With the agreement of Respondents, the Commissioner, acting under Sections 22a-6, 22a-131, 22a-208, 22a-225, 22a-226 and 22a-449 of the Connecticut General Statutes ("CGS"), orders Respondents as follows:
1. Respondents shall maintain its compliance with all applicable provisions of the Regulations of Connecticut State Agencies Sections 22a-449(c)-100, et. seq., and Section 22a-209, et. seq. including but not limited to those regulations applicable to generators of hazardous waste and solid waste identified in paragraph A.4. and A.5. above, in accordance with the following schedule:

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- a. On or before **thirty (30) days** after issuance of this consent order, Respondents shall retain one or more qualified consultant(s) 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). Respondents shall retain one or more qualified consultant(s) acceptable to the Commissioner until this consent order is fully complied with, and, within ten (10) days after retaining any consultant other than one originally identified under this paragraph, Respondents shall notify the Commissioner in writing of the identity of such other consultant. Respondents shall submit to the Commissioner a description of a 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. The consultant(s) retained to prepare the documents and implement or oversee the actions required by this consent order must be an independent, registered professional engineer in the State of Connecticut ("P.E.") or must provide professional services in accordance with Section 22a-133v-1 through 8 of the RCSA (the Licensed Environmental Professional Regulations). Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
  - b. On or before **sixty (60) days** after issuance of this consent order, Respondent PBC&S shall perform all actions which it failed to perform as specified in paragraph A.4.a. of this consent order and submit for the review and written approval of the Commissioner the details of all such corrective actions, and supporting documentation demonstrating that the violations have been corrected.
  - c. On or before **ninety (90) days** after the date of issuance of this consent order, Respondent PBC&S shall submit for the Commissioner's review and approval a COPY of a completed Best Management Practices Plan ("BMP") checklist for Auto Recycling Facilities. Respondent PBC&S must submit a certification statement indicating that Respondent PBC&S will incorporate the BMP into daily operations at the facility. Refer to the enclosed example BMP.
  - d. Respondent PBC&S shall conduct a comprehensive recycling review of the facility 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 PBC&S 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.
  - e. On or before **three hundred sixty five (365) days** after issuance of this consent order, Respondents shall perform all actions which it failed to perform as specified in paragraphs A.5. of this consent order and submit for the review and written approval of the Commissioner the details of all such corrective actions, and supporting documentation demonstrating that the violations have been corrected.
2. Full compliance. Respondents 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.

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3. Status of Notice of Violation (NOV) No. WSWDH 15001. This consent order supersedes Notice of Violation No. WSWDH 15001.
  4. Civil penalty. Respondents shall pay a penalty of **two thousand, forty dollars (\$2,040)** as the total civil penalty to be sought by the Commissioner for those, and only those, violations described in paragraphs A.4 and A.5. of this consent order. Payment shall be made in three (3) equal installments of **six hundred eighty dollars (\$680)** in accordance with the provisions of paragraph B.5., in according with the following schedule:
    - a. The first installment of **six hundred eighty dollars (\$680)** shall be due and payable on or before **fourteen (14)** days after the date of issuance of this consent order.
    - b. The second installment of **six hundred eighty dollars (\$680)** shall be due and payable on or before **one hundred four (104)** days after the date of issuance of this consent order.
    - c. The third installment of **six hundred eighty dollars (\$680)** shall be due and payable on or before **one hundred ninety four (194)** days after the date of issuance of this consent order.
  5. Payment of penalties. Payment of penalties under this consent order shall be mailed or personally delivered to the Department of 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 the "Connecticut Department of Energy and Environmental Protection". The check shall state on its face, "Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division civil penalty", and the consent number identified on the first page of this consent order. A copy of the check and any transmittal letter shall also be sent to Ms. Julie Dutton, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division 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. Respondents 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 Respondents that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondents 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

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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 Respondents or, if Respondents is not an individual, by Respondents' 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 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 nonappealable and immediately enforceable. Failure to comply with this consent order may subject Respondents 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 Respondents. Until Respondents has fully complied with this consent order, Respondents shall notify the Commissioner in writing no later than 15 days after transferring all or any portion of the facility, the operations, the site or the business which is the

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subject of this consent order or after obtaining a new mailing or location address. Respondents' 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 Respondents 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 Respondents to undertake further investigation or further action to prevent or abate violations or pollution.
15. Respondents' obligations under law. Nothing in this consent order shall relieve Respondents of their 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 Respondents 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 15 days of the date Respondents 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, Respondents shall submit the correct or omitted information to the Commissioner.
20. Notification of noncompliance. In the event that Respondents 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, Respondents 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, Respondents 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 Respondents shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondents shall not excuse noncompliance or delay, and the

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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:

Denver Dixon, Sanitary Engineer 2  
Department of Energy and Environmental Protection  
Waste Engineering and Enforcement Division  
79 Elm Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106-5127

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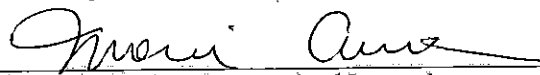
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Respondents consents to the issuance of this consent order without further notice. The undersigned certifies that he/she is fully authorized to enter into this consent order and to legally bind the Respondents to the terms and conditions of the consent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

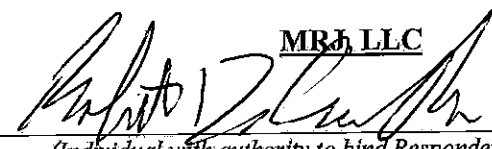
**PETER B. CURA & SONS, INC.**

BY:   
(Individual with authority to bind Respondent to terms of consent order)

NAME: M A R I A C U R A

TITLE: President

DATE: 9/10/15


BY:   
(Individual with authority to bind Respondent to terms of consent order)

NAME: Robert Cura

TITLE: Manager

DATE: 09/10/15

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

  
Michael Sullivan  
Deputy Commissioner  
Department of Energy and Environmental Protection

September 24, 2015  
Date

Town of Watertown Land Records

COWSWDH15006





## Waste Management Checklist for Auto Recycling Facilities

Date:

Facility Name:

Owner/Manager:

Address:

Telephone:

Fax:

Email:

Type of Facility (check all that apply):

- ☐ Scrap Automobile Storage
- ☐ Scrap Automobile Dismantling
- ☐ Scrap Automobile Crushing
- ☐ Non-Automotive Scrapyard
- ☐ Other (specify)

### DIRECTIONS:

Use this form to assess your compliance with Connecticut's Hazardous Waste, Solid Waste, and Recycling Management Regulations and Statutes. NOTE: *The hazardous waste management regulations can be found in sections 22a-449(c)-100 – 119 of the Regulations of Connecticut State Agencies ("RCSA"), incorporating Title 40 of the Code of Federal Regulations ("40 CFR"), Parts 260 – 279. The solid waste management regulations are found in RCSA sections 22a-209-1 – 16, and the regulations specific to mandatory recycling are in RCSA sections 22a-241b-1 – 4.*

This checklist includes references to specific pages in the *Auto Recycling Industry Compliance Guide*.

To obtain a hard copy of the *Auto Recycling Industry Compliance Guide*, call DEEP at 1-888-424-4193.

The page references in this checklist are for the website version. Please be aware that the page references for material in the website version may be different from those for the same material in the hard copy version. Use the "Table of Contents" for assistance in referring to material in the hard copy version.

The legal requirements referenced in this compliance checklist are described in detail in the *Auto Recycling Industry Compliance Guide*. While efforts were taken to make this checklist as complete as possible, it was not possible to account for every conceivable situation that might occur. As a result, compliance with all the items in the checklist does not necessarily mean that an auto recycling facility is in complete compliance with all applicable regulatory requirements.

## Part One: Hazardous Waste Management Requirements

(Auto Recycling Industry Compliance Guide, Pages 13 – 27)

1. Do you have copies of hazardous waste determination documentation for each of the wastes generated at your facility [RCSA §22a-449(c)-102(a)(2), 40 CFR 262.11]? NOTE: *You must keep records of your hazardous waste determination documentation for at least 3 years from the date the waste was last sent off-site for disposal. For more information on how to properly perform hazardous waste determinations, see pages 13 – 14 of the Auto Recycling Industry Compliance Guide. Also, additional information, including helpful forms such as a hazardous waste determination summary sheet, is available on the DEEP website at [www.ct.gov/dep/rcrahelp](http://www.ct.gov/dep/rcrahelp).*

Do you have hazardous waste determination documentation on file for each of the following wastes (check N/A if you do not generate that waste)?

- |  |                              |                             |                              |
|--|------------------------------|-----------------------------|------------------------------|
| <input type="checkbox"/> Aerosol cans  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Airbag canisters  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Mercury switches  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Paint-related wastes  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Rags and wipers   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Spent lead-acid batteries (unless stored for recycling)   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Used absorbents (pigs, SpeedyDry, etc.)   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Used fuel filters (unless drained and sent for metal recycling)   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Used oil  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Waste antifreeze  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Waste gasoline and other fuels (unless sent for fuel blending or recycling)   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Waste solvents/parts washer solution  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Others (list them and indicate whether or not you have hazardous waste determination documentation on file for each one): |                              |                             |                              |

Who are your waste hauler(s)?

Explain how you manage and store your hazardous waste on-site:

2. What is your hazardous waste generator status? NOTE: *If you are not sure, see page 15 of the Auto Recycling Industry Compliance Guide, or go to [www.ct.gov/dep/rcrahelp](http://www.ct.gov/dep/rcrahelp).*

- ☐ Conditionally Exempt Small Quantity Generator ("CESQG") (go to Question #3 in this section)
- ☐ Small Quantity Generator ("SQG") (go to Question #4 in this section)
- ☐ Large Quantity Generator ("LQG") (go to Question #5 in this section)

## Waste Management Checklist For Auto Recycling Facilities

3. If you are a **Conditionally Exempt Small Quantity Generator**, you must do the following [RCSA § 22a-449(c)-101(b), 40 CFR 261.5]:

- ☐ Ensure that you do not generate more than 100 kilograms (approximately 26 gallons) of hazardous waste in any calendar month, and do not accumulate more than 1000 kilograms (approximately 260 gallons) of hazardous waste on-site at any time.
- ☐ Ensure that your hazardous waste is disposed of at a permitted hazardous waste treatment or disposal facility, or at a household hazardous waste facility (or one-day collection event) that accepts small business waste.

Explain how your hazardous waste is prepared for shipment and shipped off-site:

- ☐ Ensure that any hazardous waste haulers that you use have a valid EPA Identification number and transporter's permit to haul waste in Connecticut.

What are the names and EPA Identification number(s) of your hazardous waste hauler(s)?

- ☐ Perform a hazardous waste determination on each of the wastes you generate. Repeat hazardous waste determinations annually, and whenever there are changes in the raw materials that are used or the processes generating the waste.
- ☐ Keep records of all test results and other information used to make these determinations for at least three years from the date that the waste was last sent off-site for disposal.

4. If you are a **Small Quantity Generator**, you must do the following [RCSA §§ 22a-449(c)-102(b) and -102(c), 40 CFR 262.34(d)]:

- ☐ Ensure that you do not generate more than 1000 kilograms (approximately 260 gallons) of hazardous waste in any calendar month, and do not accumulate more than 1000 kilograms (approximately 260 gallons) of hazardous waste on-site at any time.
- ☐ Have an EPA Identification Number.

EPA Identification Number:

## Waste Management Checklist For Auto Recycling Facilities

- ☐ Ensure that any hazardous waste haulers that you use have a valid EPA Identification number and transporter's permit to haul waste in Connecticut.

What are the names and EPA Identification number(s) of your hazardous waste hauler(s)?

|  |
|--|
|  |
|--|

- ☐ Ensure that your hazardous waste is disposed of at a permitted hazardous waste treatment or disposal facility.
- ☐ Perform a hazardous waste determination on each of the wastes you generate. Repeat hazardous waste determinations annually, and whenever there are changes in the raw materials that are used or the processes generating the waste.
- ☐ Keep records of all test results and other information used to make these determinations for at least three years from the date that the waste was last sent off-site for disposal.
- ☐ Prepare a hazardous waste manifest for each off-site shipment of waste, and retain a copy of the manifest for each shipment. Ensure that the required Land Disposal Restriction ("LDR") notices accompany each manifested shipment, and retain copies of these notices on-site.
- ☐ Ensure that you do not store waste on-site for more than 180 days.
- ☐ Store your waste only in containers or tanks.

**Do you store hazardous waste in containers?** ☐ Yes ☐ No

If yes, you must do the following:

- ☐ Mark each container with the words "Hazardous Waste," a description of the contents, such as the chemical name, and the date of initial accumulation.
- ☐ Store containers in an area that has an impervious base, and secondary containment that is capable of containing the volume of the largest container stored in the area, or ten percent of the total volume of waste stored in the area (whichever is greater). NOTE: *If the storage area is outside, measures should be implemented to prevent precipitation from accumulating within the secondary containment. Otherwise, accumulated precipitation will have to be collected for proper disposal.*
- ☐ Use only containers that are compatible with the waste you are putting in them, and keep containers away from other wastes or raw materials that they may be incompatible with by using a dike, berm, wall, or other device to separate them.
- ☐ Ensure that containers are kept closed and in good condition, and immediately replace or over-pack any damaged or leaking containers.

## **Waste Management Checklist For Auto Recycling Facilities**

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- ☐ When shipping hazardous waste off-site, ensure that containers are properly packaged, marked and labeled in accordance with U.S. DOT shipping requirements for hazardous materials.

**Do you store hazardous waste in tanks?** ☐ Yes ☐ No

If yes, you must do the following:

- ☐ Mark each tank with the words "Hazardous Waste," and a description of the contents, such as the chemical name.
- ☐ Ensure that the waste is compatible with the tank (e.g., do not put corrosive waste in an unlined steel tank) and do not store wastes that are incompatible with one another in the same tank.
- ☐ Do not use uncovered tanks.
- ☐ Ensure that ignitable and reactive wastes that are stored in containers or tanks are separated from sources of ignition or reaction (e.g., open flames, smoking, welding, sparks).
- ☐ If you discontinue the use of a tank or container storage area, remove all waste, thoroughly clean and decontaminate the area, and perform post-decontamination testing to confirm that no waste residues remain.
- ☐ Develop a written inspection schedule that lists the areas of the facility to be inspected and describes procedures to be followed during inspections.
- ☐ Perform inspections of all hazardous waste storage areas (weekly for containers, daily for tanks), looking for leaks, spills, damaged containers, and other hazardous conditions. SQGs must have communications equipment, portable fire extinguishers, spill control equipment, decontamination equipment, and a water supply, foam equipment and/or water sprinklers for fire suppression, on-site. This safety and emergency equipment must be inspected monthly. Correct any problems as quickly as possible.
- ☐ Document your inspections (and any corrective actions taken to address noted problems) in a written inspection log, and keep these records for at least three years.
- ☐ Designate an emergency coordinator and post the name and telephone number of this coordinator next to the on-site telephone, along with the locations of fire extinguishers and spill control material, the fire alarm (if you have one), and the telephone number of the local fire department (i.e., 911). Make arrangements with local emergency response authorities to coordinate emergency services in the event of an emergency.
- ☐ Ensure that whenever waste is being handled, personnel have access to an internal alarm or emergency communication device.
- ☐ Train all personnel involved in hazardous waste management in proper waste handling and emergency procedures relevant to their specific job duties.

## Waste Management Checklist For Auto Recycling Facilities

5. If you are a **Large Quantity Generator**, you must do the following [RCSA §§ 22a-449(c)-102(a) and (b), 40 CFR 262.34(a) and (b)]:

- ☐ Have an EPA Identification Number.

EPA Identification Number:

- ☐ Ensure that any hazardous waste haulers that you use have a valid EPA Identification number and transporter's permit to haul waste in Connecticut.

What are the names and EPA Identification number(s) of your hazardous waste hauler(s)?

- ☐ Ensure that your hazardous waste is disposed of at a permitted hazardous waste treatment or disposal facility.
- ☐ Perform a hazardous waste determination on each of the wastes you generate. Repeat hazardous waste determinations annually, and whenever there are changes in the raw materials that are used or the processes generating the waste.
- ☐ Keep records of all test results and other information used to make these determinations for at least three years from the date that the waste was last sent off-site for disposal.
- ☐ Ensure that you do not store wastes on-site for more than 90 days.
- ☐ Prepare a hazardous waste manifest for each off-site shipment of waste, and retain a copy of the manifest for each shipment. Ensure that the required Land Disposal Restriction ("LDR") notices accompany each manifested shipment, and retain copies of these notices on-site.
- ☐ Properly manage ignitable, reactive, and incompatible wastes. Specifically, you must take precautions to prevent fires involving ignitable or reactive wastes by separating and protecting such wastes from sources of ignition, by confining smoking and open flames to designated locations only, and by posting "No Smoking" signs in areas where ignitable or reactive wastes are stored. In addition, you must manage incompatible wastes in a manner which will prevent the generation of heat, pressure, fire or explosion, or the production of mists, fumes, dusts, or gases.
- ☐ **Do you store hazardous waste in containers?** ☐ Yes ☐ No  
If yes, you must do the following:
- ☐ Mark each container with the words "Hazardous Waste," a description of the contents, such as the chemical name, and the date of initial accumulation.

## **Waste Management Checklist For Auto Recycling Facilities**

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- ☐ Store containers in an area that has an impervious base, and secondary containment that is capable of containing the volume of the largest container stored in the area, or ten percent of the total volume of waste stored in the area (whichever is greater). NOTE: *If the storage area is outside, measures should be implemented to prevent precipitation from accumulating within the secondary containment. Otherwise, accumulated precipitation will have to be collected for proper disposal.*
- ☐ Ensure that containers are stored such that there is adequate aisle space between containers to allow for unobstructed access by personnel, fire protection equipment, spill control equipment, and decontamination equipment.
- ☐ Use only containers that are compatible with the waste you are putting in them, and keep containers away from other wastes or raw materials that they may be incompatible with by using a dike, berm, wall, or other device to separate them.
- ☐ Ensure that containers are kept closed and in good condition, and immediately replace or over-pack any damaged or leaking containers.
- ☐ When shipping hazardous waste off-site, ensure that containers are properly packaged, marked, and labeled in accordance with U.S. DOT shipping requirements for hazardous materials.
- ☐ Not store containers of hazardous waste within 50 feet of the facility property line.
- ☐ **Do you store hazardous waste in tanks?** ☐ Yes ☐ No  
If yes, you must do the following:
  - ☐ Mark each tank with the words "Hazardous Waste," and a description of the contents, such as the chemical name.
  - ☐ Ensure that the waste is compatible with the tank (e.g., do not put corrosive waste in an unlined steel tank) and do not store wastes that are incompatible with one another in the same tank.
  - ☐ Ensure that ignitable and reactive wastes that are stored in tanks are separated from sources of ignition or reaction (e.g., open flames, smoking, welding, sparks).
  - ☐ Ensure that the tanks are constructed and installed in accordance with the required design and installation requirements, and are tested for tightness prior to use.
  - ☐ Provide tanks with special secondary containment and leak detection systems, and spill prevention and overfill controls.
  - ☐ Have tanks inspected by an independent, registered, professional engineer, and certified as to their integrity and compliance with the above requirements prior to use.
  - ☐ When LQGs permanently cease using a tank, they must perform special cleanup and decontamination activities, and, if the former tank storage area cannot be fully decontaminated, then the area must be closed in accordance with the requirements for hazardous waste landfills.

## **Waste Management Checklist For Auto Recycling Facilities**

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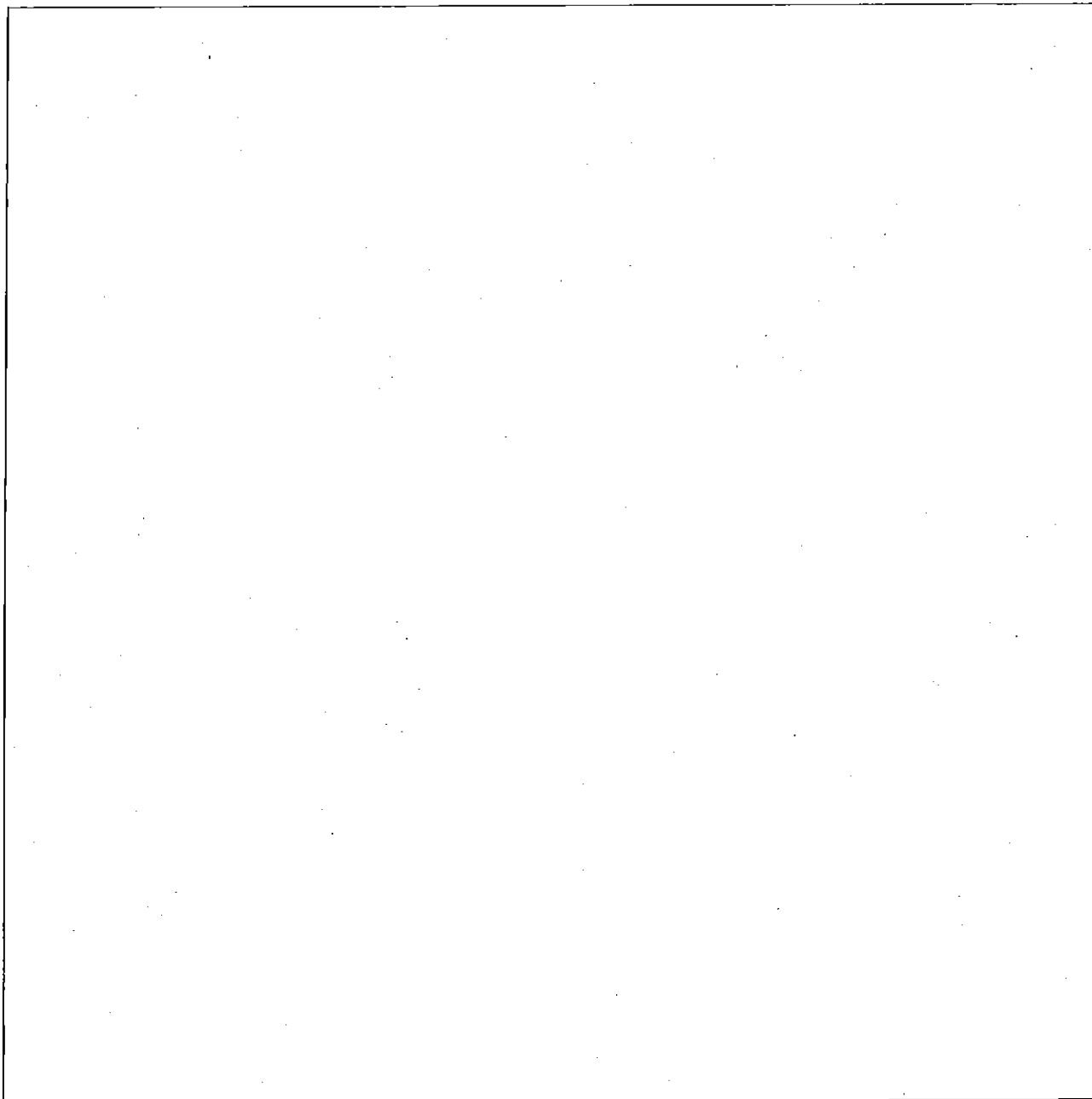
- ☐ Develop a written inspection schedule that lists the areas of the facility to be inspected and describes procedures to be followed during inspections.
- ☐ Perform inspections of all hazardous waste storage areas (weekly for containers, daily for tanks), looking for leaks, spills, damaged containers, and other hazardous conditions. LQGs must have communications equipment, portable fire extinguishers, spill control equipment, decontamination equipment, and a water supply, foam equipment and/or water sprinklers for fire suppression. This safety and emergency equipment must be inspected monthly. Correct any problems as quickly as possible.
- ☐ Document your inspections (and any corrective actions taken to address noted problems) in a written inspection log, and keep these records for at least three years.
- ☐ Comply with special air emission standards for tanks and containers (i.e., 40 CFR 265 Subparts AA, BB, and CC).
- ☐ Ensure that whenever waste is being handled, personnel have access to an internal alarm or emergency communication device.
- ☐ Designate at least one employee as a facility emergency coordinator, and ensure that, at all times, there is a qualified and knowledgeable emergency coordinator either on-site or on-call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. Also, the emergency coordinator must have the authority to commit the resources needed to carry out the contingency plan described below.
- ☐ Have a written contingency plan that includes emergency procedures to be followed in the event of a fire, explosion, spill, or other emergency. This plan must include the names, addresses, and telephone numbers of all persons qualified to act as emergency coordinators, a list of all emergency equipment at the facility (including the locations and brief descriptions of each item on the list), and a facility evacuation plan. The plan must also describe arrangements with local emergency authorities to coordinate emergency services.
- ☐ Have a formal personnel training program that provides both initial training and annual refresher training. The training program must include a written description of the training, a list of names, job titles, and descriptions for all personnel involved in hazardous waste management at the facility, and records documenting that all required training has been provided. Retain these records until closure of the facility, or for at least three years after an employee last worked at the facility.
- ☐ Submit biennial hazardous waste reports to DEEP, and keep copies of these reports for at least three years.



## **Waste Management Checklist For Auto Recycling Facilities**

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**Insert photos here of each hazardous waste tank or container storage area. Include close-up photos showing container and tank markings/labels and containment systems.**



## Part Two: Universal Waste Requirements

(Auto Recycling Industry Compliance Guide, Page 16, 19, and 34 – 36)

Universal wastes are wastes that are subject to a special, reduced set of requirements in 40 CFR 273, and include pesticides, batteries, mercury thermostats and other mercury-containing equipment, mercury-containing lamps (such as fluorescent lamps), and used electronics (such as computers and televisions). Common examples of universal waste items at Auto Recycling facilities include mercury switches (such as hood and trunk light switches), and rechargeable batteries (such as nickel-cadmium batteries). For more information on universal waste, see DEEP's Universal Waste Rule fact sheet, which is available on the DEEP website at the following address, or by calling 1-888-424-4193:

[http://www.ct.gov/dep/cwp/view.asp?a=2718&q=325432&depNav\\_GID=1646](http://www.ct.gov/dep/cwp/view.asp?a=2718&q=325432&depNav_GID=1646)

NOTE: *Lead-acid batteries may be managed under the Universal Waste Rule requirements, or the lead-acid battery requirements described in Part Three of this checklist. It is up to you to decide which set of requirements you prefer to use.*

1. Do you generate or store any of the following universal wastes (check all that apply)?

- |  |                              |                             |
|--|------------------------------|-----------------------------|
| <input type="checkbox"/> Batteries                                     | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Pesticides                                    | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Mercury-containing equipment                  | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Mercury thermostats                           | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Fluorescent or other mercury-containing lamps | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| <input type="checkbox"/> Used electronics                              | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

2. If no, skip the remainder of this section and proceed to Part Three of this checklist. If yes, you must do the following [RCSA Section 22a-449(c)-113, 40 CFR 273]:

- ☐ Properly mark each item of universal waste or each container of universal waste so as to clearly identify it. In particular, you must mark each type of universal waste as follows:
  - Batteries: "Universal Waste – Batteries" or "Waste Batteries" or "Used Batteries."
  - Cancelled/recalled pesticides: "Universal Waste – Pesticides" or "Waste Pesticides."
  - Mercury-containing equipment: "Universal Waste Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment."
  - Mercury thermostats: "Universal Waste – Mercury Thermostats" or "Waste Mercury Thermostats" or "Used Mercury Thermostats."
  - Fluorescent or other mercury-containing lamps: "Universal Waste – Lamps" or "Waste Lamps" or "Used Lamps."
  - Used electronics: "Universal Waste – Used Electronics" or "Waste Used Electronics" or "Used Electronics."

## Waste Management Checklist For Auto Recycling Facilities

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- ☐ Store universal waste for no longer than one year.
- ☐ Be able to demonstrate the length of time that universal waste has been accumulated on-site. This may be done, for example, by marking each item or container of universal waste with the initial accumulation date, or by maintaining a written log or inventory that identifies the initial date of accumulation for each universal waste item or container.
- ☐ Manage universal wastes in a way that prevents releases of universal waste, or components or constituents of universal waste to the environment.
- ☐ Store universal waste pesticides in a container that is kept closed, structurally sound, and compatible with the pesticide.
- ☐ Store universal waste lamps in containers or packages that are kept closed, structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.
- ☐ Store universal waste used electronics inside a building with a roof and four walls or in the cargo carrying portion of a truck, such as a trailer, in a way that prevents exposure to the environment.
- ☐ Ensure that universal waste used electronics are handled, stored, and transported in a way that maintains their ability to be reused, and/or recyclability.
- ☐ Ensure that all employees who handle universal waste have been trained regarding proper handling and emergency procedures for the types of universal waste they handle and their specific job duties.
- ☐ Place any universal waste item that shows signs of leakage, spillage, or damage in a container that is kept closed, is structurally sound, and is compatible with the contents of the universal waste item.
- ☐ Immediately contain any releases of universal waste.
- ☐ Manage wastes generated from the containment of releases of universal waste, or leakage, spillage, or breakage of universal waste in compliance with hazardous waste requirements. *NOTE: Waste resulting from the inadvertent breakage of small quantities of universal waste items does not have to be managed as hazardous waste, and may continue to be managed as universal waste.*
- ☐ Not crush, shred, heat, treat, or dispose of universal wastes.
- ☐ If you remove mercury ampules from mercury-containing equipment (e.g., removing mercury capsules from automatic hood and trunk light switches, you must also do the following:
  - Remove and manage the ampules in a manner designed to prevent breakage of the ampules.
  - Remove the ampules only over or in a containment device (such as a tray or pan) to collect and contain any mercury released from an ampule in case of breakage.
  - Have a mercury clean-up system or spill kit to collect and transfer any mercury resulting from spills or leaks of broken ampules to a hazardous waste container.

## Waste Management Checklist For Auto Recycling Facilities

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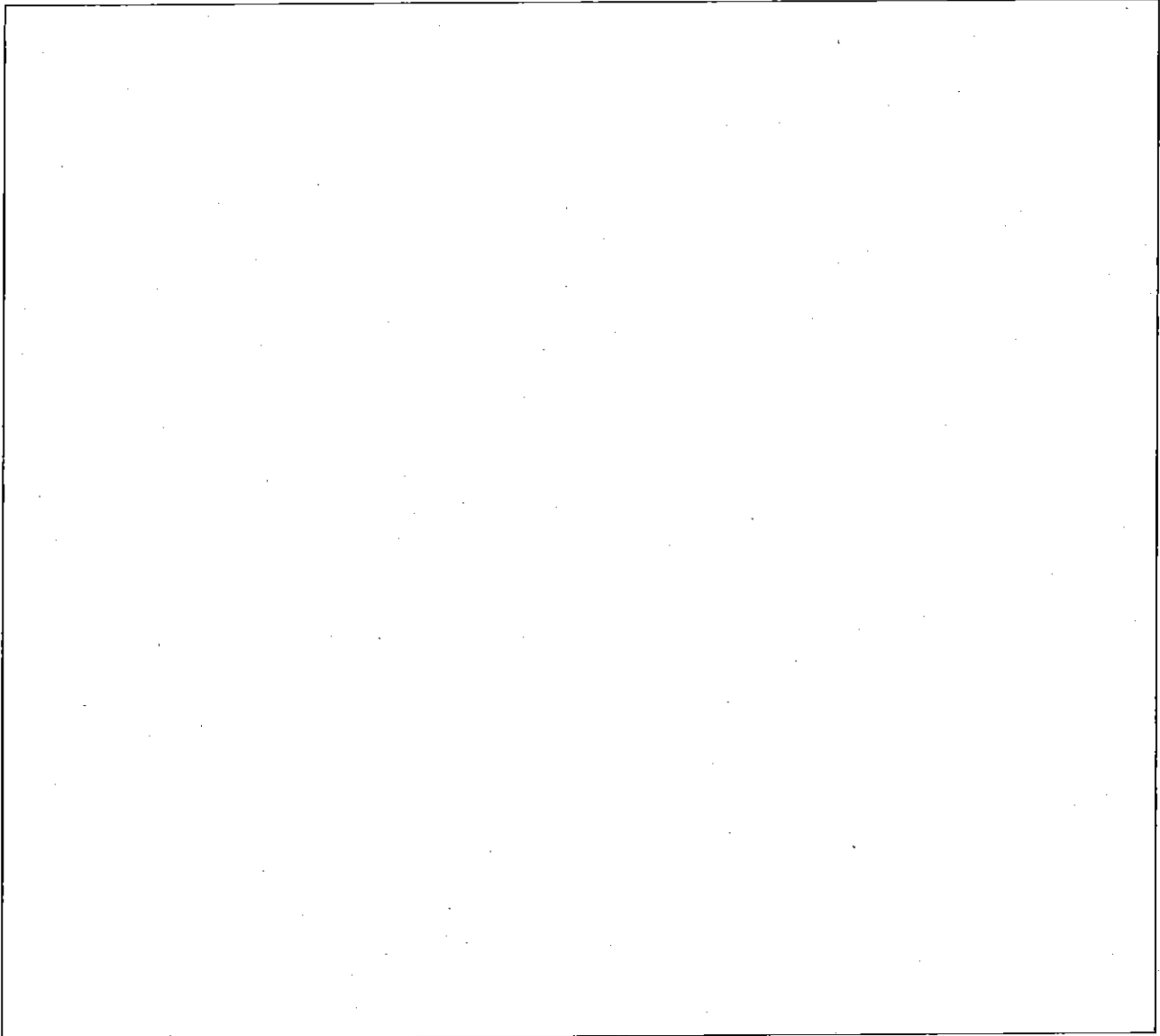
- Immediately transfer any mercury resulting from spills or leaks from broken ampules to a hazardous waste container.
  - Ensure that any areas where ampules are removed are well ventilated and monitored to ensure compliance with applicable federal Occupational Safety and Health Administration exposure levels for mercury.
  - Ensure that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, including how to manage spills and the transfer of spilled mercury to hazardous waste containers.
  - Store the removed ampules in closed, non-leaking containers that are in good condition.
  - Pack removed ampules in the container with packing materials that will prevent breakage of ampules during storage, handling, and transport.
- ❑ Before shipping universal waste off-site, ensure that it is packaged, marked, labeled and placarded in accordance with U.S. DOT rules for hazardous materials.
  - ❑ Ship universal waste to another universal waste handler, or to an authorized destination facility for recycling. Prior to shipment, ensure that the receiving facility agrees to receive the shipment. Any shipments that are rejected must be taken back, or directed to another handler or destination facility.
  - ❑ Comply with universal waste transporter requirements if you transport universal waste from one site to another [40 CFR 273 Subpart D].
  - ❑ If you store more than 5000 kilograms (11,000 pounds) of universal waste at any one time, you must also do the following:
    - Keep a record of each shipment of universal waste that is received at your site or shipped off-site. Each record must include the name and address of the person shipping the universal waste, the name and address of the person the universal waste is being shipped to, the quantity and type of universal waste being sent, and the date of receipt or shipment.
    - Keep records of shipments of universal waste for at least three years.

NOTE: *If you manage your lead-acid batteries as universal wastes, include them in the 5000-kilogram total.*

**Waste Management Checklist For Auto Recycling Facilities**

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**Insert photos here of all universal waste storage areas.**



## Part Three: Spent Lead Acid Battery Management

(Auto Recycling Industry Compliance Guide, Pages 34 – 35)

Do you handle spent lead acid batteries at your facility?

☐ Yes    ☐ No (If no, go on to Part Four)

NOTE: *You must manage your spent lead acid batteries following either the Universal Waste Rule Requirements (Item 1. below) or the Lead Acid Battery Recycling Rules (Item 2. below).*

1. Do you manage your spent lead acid batteries following the Universal Waste Rule Requirements?

☐ Yes    ☐ No (If yes, skip the remainder of Part Three of this checklist.

2. If spent lead acid batteries are not managed in accordance with the Universal Waste Rule Requirements, they must be managed in accordance with the Lead Acid Battery Recycling Rules.

You must [RCSA §22a-449(c)-106(c)]:

- ☐ Segregate batteries from paper, rags, garbage, flammables, scrap metal or hazardous chemicals by means of a dike, berm, wall, or other physical barrier.
- ☐ Store spent lead acid batteries on an impervious surface (such as concrete sealed to protect the surface from degradation).
- ☐ Inspect spent lead acid batteries weekly for leaks and deterioration. Document these inspections in a written inspection log or summary that includes the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions taken. Retain these records for at least three years.
- ☐ Ensure that batteries are not opened, handled or stored in a way that may rupture the battery case, cause it to leak, or produce short circuits.
- ☐ Open, handle or store spent lead acid batteries so that the battery case does not rupture, leak, or produce short circuits.
- ☐ Ensure that batteries are packaged, marked, labeled and placarded in accordance with U.S. DOT rules for hazardous materials before shipping batteries off-site.

Insert photos here of management of batteries (e.g., storage, labeling).



## Part Four: Used Oil Management Requirements

(Auto Recycling Industry Compliance Guide, Pages 43 – 47)

Do you generate used oil, or collect it from household do-it-yourselfers?

☐ Yes ☐ No (If no, go on to Part Five)

If yes, you must:

- ☐ Place any used oil storage tanks or containers on an impervious surface. In addition, if the tanks or containers are outdoors, you must also provide secondary containment equal in volume to the capacity of the storage tanks and containers that are stored in the storage area. If the tanks or containers are indoors, no secondary containment is required [RCSA Section 22a-449(c)-119(b)(2)].

Explain how your used oil is managed with respect to the above requirements (i.e. is it indoors or is there secondary containment?)

- ☐ Label each tank or container "Used Oil" [40 CFR 279.22(c)].
- ☐ Use a licensed waste oil transporter to haul the oil to a treatment facility for processing [Connecticut General Statutes ("CGS") Section 22a-454] **OR** burn the used oil in space heaters to provide heat for garage bays or workshop areas.

Do you have a used oil space heater? ☐ Yes ☐ No

If yes, does the used oil space heater:

- ☐ Burn only used oil that you generate or that was received from household do-it-yourselfers?
- ☐ Have a heating capacity of no more than 500,000 BTUs per hour?
- ☐ Vent to the outside air?

Do you have used oil hauled off-site for processing? ☐ Yes ☐ No

If yes, who is your used oil hauler?

- ☐ Test the used oil for total halogen content and maintain records on-site.
- ☐ Keep results of used oil testing [RCSA Section 22a-449(c)-119(b)(1)(C)].
- ☐ Prepare a Spill Prevention, Control, and Countermeasures ("SPCC") Plan if required [40 CFR 112.1]. (To find out if SPCC requirements apply to your storage of used oil, see

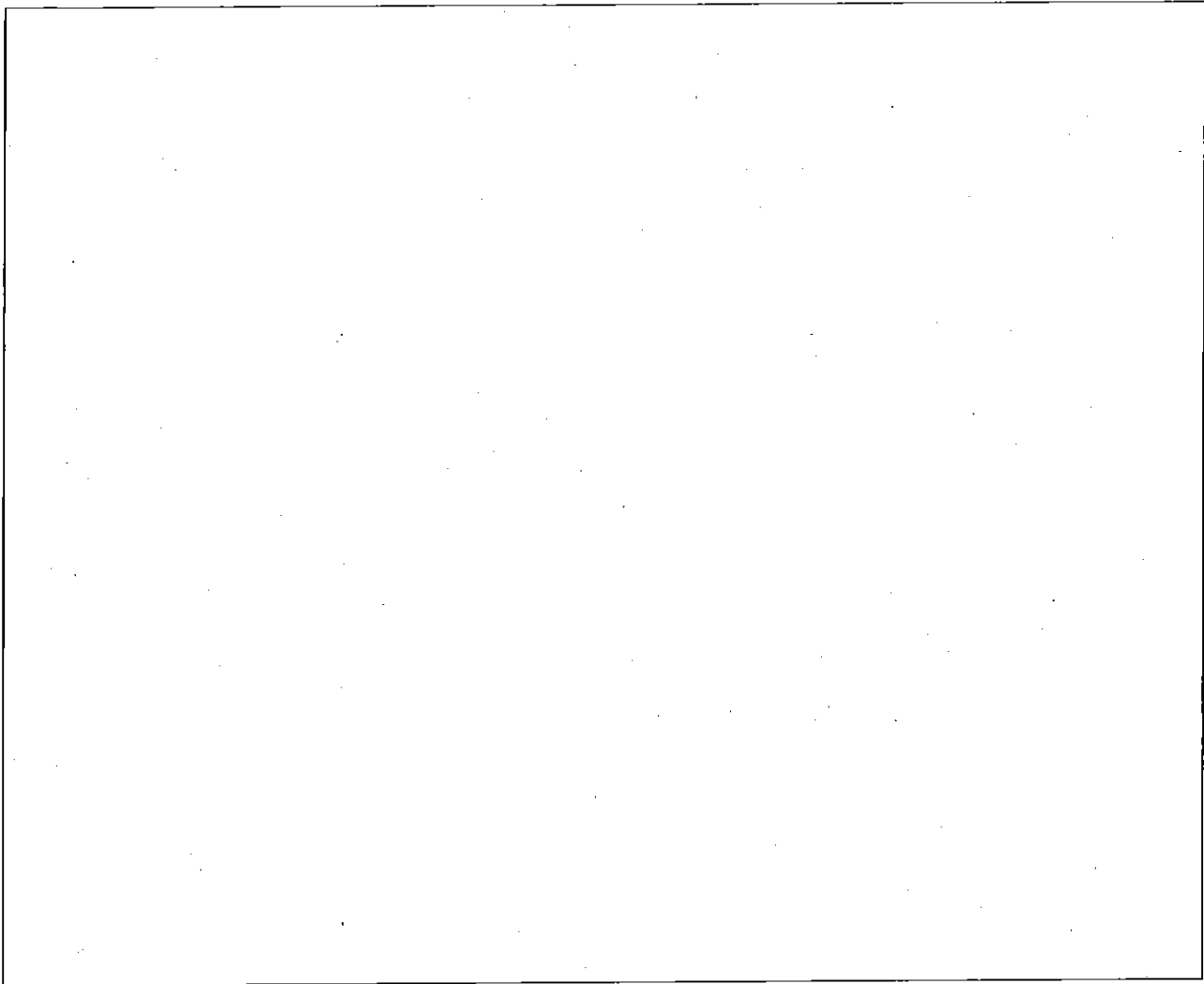


## **Waste Management Checklist For Auto Recycling Facilities**

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[www.epa.gov/emergencies/content/spcc/index.htm](http://www.epa.gov/emergencies/content/spcc/index.htm). Information on SPCC requirements is also available on the DEEP website. Go to [www.ct.gov/dep](http://www.ct.gov/dep) and enter "Spill Prevention, Control, and Countermeasure Plans" in the search box.)

**Insert photos here of storage of oil in containers and tanks as explained above.**



## **Part Five: Solid Waste Management Requirements**

(Auto Recycling Industry Compliance Guide, Pages 41 – 42)

1. Explain how garbage is collected and stored at the facility and who collects it:

2. You must provide for recycling of the following materials generated by employees and/or customers [CGS §22a-241b(d)]:

- ☐ glass and metal food/beverage containers
- ☐ corrugated cardboard
- ☐ office paper and newspaper
- ☐ leaves and grass clippings
- ☐ scrap metal
- ☐ used oil
- ☐ lead acid batteries
- ☐ nickel-cadmium batteries

**Insert photos here of garbage collection and recycling practices as explained above.**

### **Waste Management Checklist For Auto Recycling Facilities**

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3. You must not store garbage or other solid waste on-site for longer than 45 days [CGS §22a-207 and -208a].

- ☐ Properly store and dispose of scrap tires (for example, sending them to a permitted processing facility that will shred them and send them to a permitted tire burner facility).

Explain where tires are sent for reuse, recycling, energy recovery, or disposal:

- ☐ Tires should be stored indoors or inside a trailer. Any tire piles should be covered to prevent accumulation of standing water.
- ☐ Stored tires should be accessible to fire fighting and emergency response personnel, vehicles and equipment.

**Insert photos here of scrap tire storage.**

## **CERTIFICATION OF ACCURACY**

"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."

---

Date

---

Signature

---

Telephone

---

(Type name and Title)

---

Address

---

Date

---

Preparers Signature, if different than the above

---

Telephone

---

(Type name and Title)

---

Address



Connecticut Department of  
Energy & Environmental Protection

# 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, plastic containers #1 and #2\*, cardboard\*, corrugated cardboard, magazines\*, newspaper, white office paper, colored office paper\*, 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 the Connecticut Department of Energy and Environmental Protection (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](#).

## Part I: Company Information

1. Company Name:

Mailing Address:

2. Recycling Contact:

Phone(s):

3. Additional Contact:

Phone(s):

City/Town:

State:

Zip Code:

Title:

Email:

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:

\*Materials will be designated recyclables in 2012.

## Part II: Facility/Operations (continued)

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

Name:

Phone:

Name:

Phone:

Name:

Phone:

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

7. Building Owner:

Mailing Address:

City/Town:

State:

Zip Code:

Phone:

Email:

### All Businesses Are Required to Recycle:

- **High Grade White Office Paper:** White copy paper, computer paper, office stationery, memo paper, etc.
- **High Grade Colored Office Paper\*:** Colored ledger or copy paper
- **Old Corrugated Cardboard:** Old or discarded corrugated boxes – *Not waxed*
- **Boxboard\*:** Including cereal boxes, tissue boxes, or chip board
- **Old Newspaper:** Used or discarded newspapers
- **Magazines\***
- **Plastic containers #1 (PET) and #2 (HDPE)\*:** Bottles and containers
- **Glass & Metal Food and Beverage Containers** (including 5¢ deposit containers)

- **Leaves:** Foliage which has fallen from trees must be recycled
- **Grass Clippings:** Best practice is to recycle grass by leaving grass clippings on the lawn.
- **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.

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.  
**58% by 2024**

\*Materials will be designated recyclables in 2012.

### 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<br>(Indicate tons or pounds)<br>COLLECTED FOR RECYCLING<br>EACH MONTH<br>(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   |
|---|---|---|---|
| <b>EXAMPLE:</b><br>OFFICE PAPER<br>(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, (NAME) empties our paper recycling wheeled cart 2x/month (we call them as-needed) and material is taken to a permitted recycling facility (PERMITTEE NAME) in (TOWN). |
| Office paper (white paper)**  |   |   |   |
| Office paper (colored 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<br>(indicate tons or pounds)<br>COLLECTED FOR RECYCLING<br>EACH MONTH<br>(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:<br>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, (NAME) empties cardboard dumpster on Mondays and brings it to a properly permitted facility (PERMITTEE NAME) in (TOWN) for recycling. |
| Corrugated cardboard**  |  |   |   |
| Boxboard**  |  |   |   |
| Magazines**   |  |   |   |
| Food and beverage containers (check all those collected for recycling)<br><input type="checkbox"/> Glass**<br><input type="checkbox"/> Metal**<br><input type="checkbox"/> Plastic 1&2**<br><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<br>(indicate tons or pounds)<br>COLLECTED FOR RECYCLING<br>EACH MONTH<br>(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:<br>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

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

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

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

## 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:<br>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:<br>55 gallon drums   | 10/week                   | We generate 55 gallon drums, which contained <u>non-hazardous</u> 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) |
|   |                           |   |  |  |
|   |                           |   |  |  |
|   |                           |   |  |  |

**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:<br>5 gallon buckets | 15-30 buckets/month       | We generate buckets (contained non-hazardous substances) and cannot use them. Will rinse and stack (with lids) off to side of loading dock. | We're trying to secure a connection with a local reuse center or distribute via materials exchange program. | We hope to start this program by the end of August 2008. |
|                              |                           |   |   |  |
|                              |                           |   |   |  |

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

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

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION  
BUREAU OF MATERIALS MANAGEMENT & COMPLIANCE ASSURANCE  
WASTE ENGINEERING AND ENFORCEMENT DIVISION  
79 ELM STREET, 4<sup>TH</sup> FLOOR  
HARTFORD, CT 06108-5127

PHONE: (860) 424-3365