



STATE OF CONNECTICUT

V.

R.E.D. TECHNOLOGIES, LLC

CONSENT ORDER No. WSWDH21001

DATE ISSUED: January 14, 2021

A. With the agreement of R.E.D. TECHNOLOGIES, LLC ("Respondent"), the Commissioner of Energy and Environmental Protection ("the Commissioner") finds:

1. Respondent is a Delaware corporation registered to do business in Connecticut with the Connecticut Secretary of the State.
2. Respondent's registered business address listed with the Connecticut Secretary of the State is Corporation Service Company, 7211 Centerville Road, Suite 400, Wilmington, DE, 19808.
3. Respondent is or has engaged in the business of commercially operating a hazardous waste transfer facility located at 173 Pickering Street, Portland, Connecticut and more fully described as Assessor's Map 10/Lot 16 and Map 10/Lot 18 on the land records of the Town of Portland, Connecticut. The property will hereinafter be referred to as the "Site" and/or the "Facility".
4. On November 25, 2014, the Department of Energy and Environmental Protection ("DEEP") transferred Permit No. 1130951-CRW-M (the "Permit") from Charles M. Gordon and Sons, Inc. to R.E.D. Technologies, LLC to operate a commercial hazardous waste transfer facility at the Site in accordance with Sections 22a-6, 22a-454 and 22a-449(c) of the Connecticut General Statutes ("CGS"), and Section 22a-449(c)-110 of the Regulations of Connecticut State Agencies ("RCSA").
5. On September 13, 17, 20 and 27, 2019, staff from the Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division ("WEED") conducted an inspection at the Site; and a subsequent file review was conducted on January 6, 2020, to evaluate compliance with the conditions of the Permit. Based upon the inspection and associated file review, WEED found that the Respondent failed to:
 - a. Ensure wastes subject to Truck-To-Truck Transfer are not stored at the Facility for greater than ten (10) calendar days from the date such waste arrived at the Facility, as required by Section III.A.3.(a) of the Permit. In addition to violating Section III.A.3.(a) of the Permit, the storage of hazardous waste for greater than ten days at a transfer facility subjects the Facility to RCSA Section 22a-449(c)-104 - Standards For Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal

Facilities and RCSA Section 22a-449(c)-110 - The Hazardous Waste Permit Program. More specifically, DEEP found that at least 200 containers of hazardous and non-hazardous waste were stored in the 10-Day Drum Building in excess of the 10 day limit.

- b. **Maintain sufficient aisle space between rows of Non-Bulk Containers, Lab Packs, and Intermediate Bulk Containers, as required by Section III.A.16.(b) of the Permit.** More specifically, DEEP found that a minimum of twenty-four (24) inches was not maintained between rows of containers in numerous areas of the Facility to facilitate container inspections and/or to allow unobstructed movement of personnel and equipment.
- c. **Ensure that incompatible wastes are not comingled or stored in close proximity of each other, as required by Section III.A.42 of the Permit.** More specifically, DEEP found that incompatible wastes were stored in close proximity of each other without physical means of separation. The majority of the incompatible scenarios found were caused by wastes being stored in areas not authorized to store such waste.
- d. **Conduct and/or record inspections, as required by Section IV.C. of the Permit.** More specifically, DEEP found that the Facility failed to perform and/or record inspections (for labelling, compatibility, aisle space, secondary containment capacities, permitted storage areas, etc.) required by the Permit.
- e. **Maintain relevant information in the Operating Record, as required by Section IV.G. of the Permit.** More specifically, DEEP found that while most of the information required for customer's waste was included in the Operating Record, the actual location where such waste was stored at the Facility and/or the dates of shipment (inbound and outbound) were found to be inaccurate.
- f. **Follow rejected waste protocol, as required by Section III.A.12. of the Permit.** More specifically, DEEP found that three, one cubic yard boxes received from Cargill Mills in September 2019 (Manifest No. 013310447FLE) did not meet waste acceptance protocol in accordance with the Permit, requiring the waste to be rejected. DEEP found that these waste containers were not transferred off-site within twenty-four (24) hours of receipt as required.
- g. **Perform compliance audits, as required by Sections V.B. and V.C. of the Permit.** More specifically, DEEP found that the quarterly and annual compliance audits required pursuant to Section V.B. and V.C of the Permit had not been performed since December 22, 2017.
6. By virtue of the above, the Respondent has violated conditions of the Permit and relevant requirements of Section 22a-449(c)-100, et seq. of the RCSA.
7. On November 27, 2019, WEED issued Notice of Violation No. WSWDH19049 to the Respondent to correct the violations corresponding to those cited in subparagraphs A.5.a. and A.5.f. of this consent order.
8. On December 20, 2019 and January 14, 2020, WEED received a Compliance Statement and additional supporting information in response to Notice of Violation No. WSWDH19049.

These responses failed to adequately document that the violations identified in paragraphs A.5.a. through A.5.f. above have been brought back into compliance.

9. On January 10, 2020, WEED issued Notice of Violation No. WSWDH20002 to the Respondent to correct the violations corresponding to those cited in subparagraphs A.5.g. of this consent order. These violations were found on January 6, 2020 during a file review conducted in association with the violations found during DEEP's September 2019 inspection of the Facility.
10. On January 27 2020, WEED received a Compliance Statement in response to Notice of Violation No. WSWDH20002. A.5.g. above. The response failed to adequately document that the violation identified in paragraphs A.5.g. above has been brought back into compliance.

B. With the agreement of Respondent, the Commissioner, acting under Sections 22a-6, 22a-131, 22a-454, and 22a-449 of the CGS, orders Respondent as follows:

1. Compliance Assurance. Respondent shall bring all violations identified in paragraph A.5. into compliance and maintain its compliance with all applicable provisions of the Sections 22a-449(c)-100, et. seq. of the RCSA and the Permit, including but not limited to those regulations and permit conditions identified in paragraph A.5. above. In particular:
 - a. Retention of Consultant: On or before thirty (30) days after the issuance of this consent order, the Respondent shall identify, for the Commissioner's review and written approval, one or more qualified consultant to prepare the documents and oversee the actions required by this consent order. The Respondent shall retain one or more qualified consultants as approved by the Commissioner until they comply with this consent order. Within ten (10) days after retaining any qualified consultant other than one originally identified and approved under this paragraph, the Respondent shall notify the Commissioner in writing of the identity of and receive written approval of such other qualified consultant from the Commissioner. In order to seek approval of a qualified consultant, Respondent shall submit to the Commissioner a description of a qualified consultant's education, experience and training which is relevant to the work required by this consent order. 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.") and must be knowledgeable in Connecticut's Hazardous Waste Management Regulations, including the requirements for hazardous waste transporters and hazardous waste transfer facilities. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
 - b. Correct Violations. On or before **thirty (30) days** after issuance of this consent order, Respondent shall submit, for the Commissioner's review and approval, documentation demonstrating that the violation noted in paragraph A.5. above have been corrected.
 - c. Comprehensive Plan. On or before **sixty (60) days** after issuance of this consent order, Respondent shall submit, for the Commissioner's review and written approval, a plan detailing additional actions and/or operational changes it has undertaken or will undertake to ensure compliance with: 1) Connecticut's Hazardous Waste Management Regulations Section 22a-449(c)-100, et. seq. of the RCSA; and 2) the Permit including, but not limited to, those set forth

in paragraph A.5. 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. Business Recycling Profile. On or before **ninety (90) days** after 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(d), and shall submit for the Commissioner's review and written approval a Business Recycling Profile documenting the management of recyclable materials at the facility. Refer to the enclosed Business Recycling Profile (**Attachment A**).
2. Full compliance. Respondent shall not be considered in full compliance with this consent order until all actions required by this consent order have been completed as approved and to the Commissioner's satisfaction.
3. Civil penalty for violations. On or before **fourteen (14) days** after the date of issuance of this consent order, Respondent shall pay a civil penalty of **eighty - five thousand dollars (\$85,000)** as the total civil penalty to be sought by the Commissioner for those, and only those, violations described in paragraphs A.5. of this consent order. Payment shall be made in accordance with the provisions of paragraph B.4.
4. Payment of penalties. Payment of penalties under paragraph B.4. of 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 "Connecticut Department of Energy and Environmental Protection." The check shall state in the memo notation, "Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division and Water Permitting and Enforcement Division civil penalty" and the consent order number identified at the top of page one of this consent order. Copies of the check and any transmittal letter shall also be sent to Ms. Julie Dutton in the Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, at the same address.
5. 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.
6. 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.

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

10. Noncompliance. This consent order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this consent order may subject Respondent to an injunction and penalties.
11. 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.
12. 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.

13. Commissioner's powers. Except as provided hereinabove with respect to payment of civil penalties pursuant to this consent order, 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 not otherwise addressed by this consent order. 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.
14. Respondent's obligations under law. Nothing in this consent order shall relieve Respondent of other obligations under applicable federal, state and local law.
15. 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.
16. 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.
17. 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.
18. 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.
19. 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.

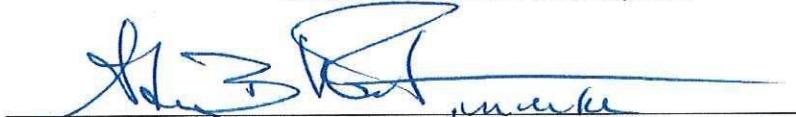
20. Submission of documents. Any document required to be submitted to the Commissioner under this consent order shall, unless otherwise specified in this consent order or in writing by the Commissioner, be directed to:

Mr. Paul Franson, Environmental Analyst 3
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
Department of Energy and Environmental Protection
79 Elm Street, Hartford, Connecticut 06106-5127

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

R.E.D. TECHNOLOGIES, LLC

BY:



(Signature of the individual with authority to bind Respondent to terms of consent order)

ADAM B. WESTHAVER
Name (typed)

Member
Title

1/14/21
Date

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

Betsey Wingfield
Betsey C. Wingfield
Deputy Commissioner
Department of Energy and Environmental Protection

January 14, 2021
Date

Attachment A

Business Recycling Profile



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, boxboard, 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 60% by 2024 as stated in the 2016 Comprehensive Materials Management Strategy. 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:	City/Town:	State:	Zip Code:
Mailing Address:			
2. Recycling Contact:	Title:		
Phone(s):	Email:		
3. Additional Contact:	Title:		
Phone(s):	Email:		

Part II: Facility/Operations

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

Part II: Facility/Operations (continued)

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

Name: _____
 Name: _____
 Phone: _____

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

7. Building Owner:
 Mailing Address:
 Phone: _____

City/Town: _____
 Email: _____
 State: _____ Zip Code: _____

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.

60% by 2024

Part III: Company's Current Recycling & Recovery Efforts

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

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (if you do not have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: OFFICE PAPER (White and other paper combined)	One 40-gallon wheeled cart/week	Everyone collects at their desk, brought to central location (large wheeled cart near elevators). Janitor brings to loading dock when it is full (about once a week)	Our current trash hauler, (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 (Indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH	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
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, (NAME) empties cardboard dumpster on Mondays and brings it to a property permitted facility (PERMITTEE NAME) in (TOWN) for recycling.
Corrugated cardboard**			
Boxboard**			
Magazines**			
Food and beverage containers (check all those collected for recycling)	<input type="checkbox"/> Glass** <input type="checkbox"/> Metal** <input type="checkbox"/> Plastic 1&2** <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 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)

MATERIAL	AVG WEIGHT (indicate tons or pounds)	COLLECTED FOR RECYCLING EACH MONTH	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
				WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Leaves and other yard debris	N/A		Our landscape company (NAME, TOWN) mows our lawns and maintains our entry garden. They remove all the materials (although grass clippings are left on the lawn).	Our landscape company (NAME) takes them away to a property permitted recycling facility, (PERMITTEE NAME, LOCATION).
Leaves**				
Grass clippings**				
Brush, stumps and 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 ReCONNstruction Center in New Britain.
ReUse	
ReUse	
Other	
Other	

Part V: Recycling & Recovery Programs Planned

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

IDEA / MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIAL BE COLLECTED?	WHO WILL PICK-UP THIS MATERIAL? FINAL/END MARKET?	WHEN WILL PROGRAM BE IMPLEMENTED?
EXAMPLE: Food and Beverage containers (glass, metal and plastic)	25 gallons/month	Will place barrel in break room; janitorial staff will empty and remove materials to a larger container on our loading dock.	There are a lot of 5¢ deposit containers. We're looking into having a local non-profit organization collect them for free and redeem the deposits.	We will start this program by August 8, 2008 (2 weeks from now).
EXAMPLE: 55 gallon drums	10/week	We generate 55 gallon drums, which contained non-hazardous substances. We stockpile them outside the plant until we have 50 drums.	Working with XYZ, a company that 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: 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, 4TH FLOOR
HARTFORD, CT 06106-5127

PHONE: (860) 424-3365

