



## STATE OF CONNECTICUT

### V.

### CIRCLE OF LIFE, LLC

**CONSENT ORDER No. WSWDS19001**

**Date Issued: 1/10/2019**

- A. With the agreement of Circle of Life, LLC, ("Respondent"), the Commissioner of Energy and Environmental Protection ("the Commissioner") finds:
1. Circle of Life, LLC is a limited liability company registered with Connecticut's Office of Secretary of the State, which is engaged in a solid waste business located at 158 and 158R Middletown Avenue, New Haven, Connecticut, ("the Site") shown in map 132, block 1047, lot 00102 in the New Haven Tax Assessor's Office.
  2. On December 23, 2016, Solid Waste Permit to Construct and Operate No. 09301253-PCO ("PCO") was issued to Respondent to operate a transfer station and volume reduction plant ("the Facility"). Permitted activities at the Facility are associated with the storage and processing of construction and demolition debris ("C&D"), clean wood, and ash.
  3. On February 28, 2018, the Department of Energy and Environmental Protection, ("the Department") Waste Engineering and Enforcement Division inspected the Site. On May 9, 2018, the Department received fourth (4<sup>th</sup>) quarter 2017 and first (1<sup>st</sup>) quarter 2018 compliance audit reports for the Site. Based upon the inspection and information provided in the compliance audit reports, the Department found the following violations:
    - a. Failure to store and confine unprocessed solid waste inside of the approved enclosed structure as required by PCO paragraphs A.3., C.4., and C.4.c. and Regulations of Connecticut State Agencies (RCSA) § 22a-209-4(e) and 22a-209-10(5). Specifically, approximately 4,188 cubic yards of unprocessed C&D were observed outside of the enclosed structure.
    - b. Failure to maintain unprocessed solid waste volumes at the Site within the approved storage limits, as required by PCO paragraphs A.3. and C.4. and RCSA § 22a-209-4(e) and 22a-209-10(4). Specifically, the volume of unprocessed C&D at the Site on February 28, 2018 was observed at a level significantly above permit limits. Specifically, approximately 4,188 cubic yards of unprocessed C&D was observed at the Site on February 28, 2018, outside of the enclosed structure.
    - c. Failure to maintain processed solid waste volumes at the Site within the approved storage limits, as required by PCO paragraphs A.3. and C.4. and RCSA § 22a-209-4(e) and 22a-209-10(4). Specifically, approximately ninety-three (93) railcars of processed C&D were observed at the Site on February 28, 2018.

- d. Failure to transfer processed solid waste from the Site within two (2) business days, as required by PCO paragraphs A.3. and C.4. Specifically, approximately ninety-three (93) railcars of processed C&D were observed at the Site on February 28, 2018.
  - e. Failure to contain unauthorized solid waste and maintain the volume of this material at the Site within the approved storage limits, as required by PCO paragraphs A.3., C.5.b. and C.5.c. and RCSA § 22a-209-4(e). Specifically, approximately three hundred (300) tires and several mattresses were observed at the Site on February 28, 2018.
  - f. Failure to immediately correct violation(s) observed during a compliance audit inspection or provide a detailed plan to correct all such violations to the Department for review and approval within seven (7) days of being notified of such violations, as required by PCO paragraphs A.3. and C.15.e. Specifically, the compliance audit for the first (1<sup>st</sup>) quarter of 2018, dated March 30, 2018, received by the Department on May 9, 2018 identified violations for exceedance of storage limits at the Site and exceedance of on-site holding times for several railcars filled with processed C&D. These violations were not immediately corrected nor was a plan to correct all such violations provided to the Department in a timely manner.
  - g. Failure to cease accepting solid waste at the Site after failing to immediately correct violations observed during a compliance audit inspection and failing to submit in a timely manner a detailed plan to correct all such violations to the Department for review and approval, as required by PCO paragraphs A.3. and C.15.f.
  - h. Failure to submit compliance audits in a timely manner as required by PCO paragraphs A.3. and C.15.g. Specifically, the following compliance audits were not submitted in a timely manner: compliance audit performed on December 14, 2017, dated January 26, 2018, and received by DEEP on May 9, 2018; and compliance audit performed on March 23, 2018 and March 29, 2018, dated March 30, 2018, and received by DEEP on May 9, 2018.
  - i. Failure to submit quarterly, monthly summaries of solid waste received to the Department in a timely manner, as required by PCO paragraphs A.3. and C.10, and RCSA § 22a-209-4(e) and § 22a-209-10(13). Specifically, fourth (4<sup>th</sup>) quarter of 2017 and the first (1<sup>st</sup>) quarter of 2018 were not received by DEEP until May 7, 2018.
  - j. Failure to keep the Facility and adjacent areas reasonably clean and free of litter as required by PCO paragraphs A.3. and C.5.f., and RCSA § 22a-209-4(e) and 22a-209-10(6). Specifically, excessive litter was observed in between each of the three rail lines as well as on each rail line and in back of the enclosed structure.
4. On May 21, 2018, the Department issued Notice of Violation No. WSWDS18023 ("NOV") to Respondent requiring correction of the violations cited in paragraph A.3. of this Consent Order.
5. On or before February 28, 2018, Respondent altered and/or amended Facility operations without obtaining a modified permit in violation of Connecticut General Statutes ("CGS") § 22a-208a(d) and 22a-208a(e) and RCSA § 22a-209(4).



6. On May 24, 2018, the Department received a letter from the Respondent in response to the NOV noting the progress to date in cleanup of the Facility. Additionally, the Respondent requested an extension in order to achieve full compliance with the NOV. On May 31, 2018, the Department extended the date of compliance with the NOV to June 29, 2018, and also requested weekly progress reports from the Respondent. On June 1, 2018, June 11, 2018, June 18, 2018, the Department received progress reports from the Respondent. On June 29, 2018, Respondent submitted a signed compliance statement and reported that all violations were corrected.
  7. Respondent failed to provide the required certifications and signatures by a duly authorized representative, as required by PCO paragraph C.17., for compliance audits performed for the fourth (4<sup>th</sup>) quarter 2017, first (1<sup>st</sup>) quarter 2018, and second (2<sup>nd</sup>) quarter 2018.
  8. By virtue of the above, Respondent has violated the PCO, and RCSA §§ 22a-209-4(e), 22a-209-10(4), 22a-209-10(5), 22a-209-10(6), and 22a-209-10(13).
  9. By agreeing to the issuance of this Consent Order, the Respondent makes no admission of fact or law with respect to the matters addressed herein, other than the facts asserted in paragraphs A.1. and A.2. of this Consent Order.
- B. With the agreement of the Respondent, the Commissioner, acting under §§ 22a-6, 22a-208 and 22a-225 of the Connecticut General Statutes, orders Respondent as follows:
1. Respondent shall bring all violations identified in paragraphs A.3., A.5. and A.7. above into compliance and maintain its compliance with all applicable provisions of the CGS § 22a-208a, RCSA §§ 22a-209-1 to 22a-209-17 et. seq., and the PCO.
  2. On or before thirty (30) days after the date of issuance of this Consent Order, Respondent shall retain one or more qualified consultants acceptable to the Commissioner to prepare the documents and implement or oversee the actions required by this consent order and shall, by that date, notify the Commissioner in writing of the identity of such consultant(s). Respondent shall retain one or more qualified consultants 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, Respondent shall notify the Commissioner in writing of the identity of such other consultant. Respondent 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."). Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
  3. Future Compliance. On or before sixty (60) days after the date of issuance of this Consent Order, Respondent shall submit to the Commissioner, for his review and written approval, a plan which details the actions and/or operational changes to ensure future compliance with the Solid Waste Management Regulations, RCSA § 22a-209-1, et. seq., including but not limited to those set forth in paragraphs A.3., A.5. and A.7. 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.
  4. Documents delineating Solid Waste Facility (Facility) Areas of Control. On or before ninety (90) days after the date of issuance of this Consent Order, Respondent shall submit to the Commissioner, for his review and

written approval, documentation demonstrating ownership, control, or legal right of use of the rail lines/spurs associated with the Facility as well as the other entities which maintain ownership, control or legal right of use over rail lines associated with the Facility. Such documentation may include, but not be limited to: A-2 survey; warranty deed; certified deed; and lease agreements and/or contracts between the Respondent and other controlling entities.

5. **Limited Area of Railcar Storage.** Until such time as the Commissioner approves the document(s) required by paragraph B.4. above demonstrating alternate and/or additional rail lines and/or spurs, or sections thereof, are under the Respondent's area of ownership, control, or legal right of use, Respondent shall limit storage of processed C&D at the Facility as authorized by the PCO to no more than thirty (30) railcars that are located only on the sections of Track Nos. 665, 667 and 669 as delineated in the attached Site Plan (Attachment A), submitted in support of the PCO.
6. **Business Recycling Profile.** On or before ninety (90) days after the date of issuance of this Consent Order, Respondent shall conduct a comprehensive recycling review of Respondent's office location to evaluate compliance with Connecticut's recycling laws set forth in CGS § 22a-241b(d). Respondent shall submit for the Commissioner's review and written approval a business recycling profile documenting the management of recyclable materials. An example profile is included as Attachment B to this Consent Order.
7. **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 satisfaction of the Commissioner.
8. **Civil penalty.** Respondent shall pay a penalty of eighty two thousand dollars (\$82,000) as the total civil penalty to be sought by the Commissioner for those, and only those violations described in paragraphs A.3., A.5. and A.7. of this Consent Order. The penalty shall be paid in four (4) equal installments in accordance with the provisions of paragraph B.10., according to the following schedule:
  - a. The first installment of the penalty shall be in the amount of twenty thousand five hundred dollars (\$20,500) due and payable on or **before thirty (30) days** after the date of issuance of this Consent Order.
  - b. The second installment of the penalty shall be in the amount of twenty thousand five hundred dollars (\$20,500) due and payable on or before **one hundred and twenty (120) days** after the date of issuance of this Consent Order.
  - c. The third installment of the penalty shall be in the amount of twenty thousand five hundred dollars (\$20,500) due and payable on or before **two hundred and ten (210) days** after the date of issuance of this Consent Order.
  - d. The fourth installment of the penalty shall be in the amount of twenty thousand five hundred dollars (\$20,500) due and payable on or before **three hundred (300) days** after the date of issuance of this Consent Order.
9. **Supplemental Environmental Project.** In lieu of making the final two payment installments prescribed in paragraph B.8 above, Respondent may comply with the requirements of paragraph B.9.a below regarding supplemental environmental projects ("SEP").
  - a. **Performance of SEP(s)**
    - (1) On or before forty-five (45) days after the date of issuance of this Consent Order, Respondent shall submit for the Commissioner's review and written approval a proposal to perform one or more



SEPs ("proposal"), according to the Department's February 15, 1996 "Policy on Supplemental Environmental Projects". The proposal shall include:

- i. a detailed description of each SEP,
- ii. itemized costs to be incurred by Respondent in carrying out each SEP,
- iii. documentation to support such cost estimates,
- iv. an explanation as to why each SEP is being proposed,
- v. a proposed schedule (of not more than 180 days) for implementation and completion of each SEP, and
- vi. a description of the benefit of each SEP to the general public or the environment.

Respondent shall be credited up to forty one thousand dollars (\$41,000) to partially fund any SEP(s).

(2) The Commissioner will either:

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

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

- (3) If the dollar amount of the penalty offset attributable to the approved SEP(s) is less than forty one thousand dollars (\$41,000), Respondent shall pay the difference in accordance with a revised schedule established by the Commissioner.
- (4) Respondent shall not be given credit, or reduction in the civil penalty provided for by this paragraph if SEP included in an approved proposal is not fully complied with. If Respondent fails to fully perform any SEP in accordance with the proposal approved pursuant to Paragraph B.9.a.(2)i., Respondent shall immediately notify the Commissioner in writing of such noncompliance and shall, upon written request by the Commissioner, remit a payment equal to the total estimated cost, as determined by the Commissioner, of all such SEP(s), plus either two thousand five hundred dollars (\$2,500) or 10% of such total estimated cost, whichever is greater. Respondent shall make such payment in accordance with the remittance procedures for unexpended SEP funds in subparagraph B.9.a.(10) of this Consent Order.
- (5) The net present after-tax value of the SEP(s) shall be equivalent to the sum(s) identified in this paragraph or Respondent shall submit certified documentation that no tax credits shall be obtained as a result of SEP(s) performed under this paragraph.

- (6) If and when Respondent disseminates any publicity, including but not limited to any press releases regarding funding an SEP, Respondent shall include a statement that such funding is in partial settlement of an enforcement action brought by the Commissioner.
  - (7) Respondent shall not claim or represent that any SEP payment made pursuant to this Consent Order constitutes an ordinary business expense or charitable contribution or any other type of tax deductible expense, and Respondent shall not seek or obtain any other tax benefit such as a tax credit as a result of the payment under this paragraph.
  - (8) On or before thirty (30) days after completion of each SEP, Respondent shall submit for the Commissioner's review and written approval a comprehensive final report that certifies completion of each SEP. Such final report shall include, at a minimum:
    - i. a narrative history of the project
    - ii. detailed explanation of its design and implementation,
    - iii. summary of any data collected,
    - iv. complete final accounting of actual project costs including receipts for out-of-pocket costs, and
    - v. a discussion of environmental benefits resulting from each SEP.
  - (9) Should the Commissioner determine that the actual cost to Respondent in completing an SEP is less than the estimated cost identified in the proposal approved by the Commissioner in accordance with paragraph B.9.a.(2)i., Respondent shall pay the difference between such actual cost and estimated cost to the Commissioner as unexpended SEP funds. The Commissioner shall notify Respondent in writing of the amount of any such unexpended SEP funds which are due.
  - (10) Respondent shall, within fourteen (14) days after the date of such written notice, remit the full amount of the unexpended SEP Funds. Payment of unexpended SEP funds shall be by certified or bank check payable to "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 civil penalty" and the Consent Order number identified at the top of page one of this Consent Order. Any payment shall be made in accordance with paragraph B.8.
10. Payment of penalties. Payment of the penalties under this Consent Order shall be mailed or personally delivered to Department of Energy and Environmental Protection, Bureau of Financial and Support Services, Accounts Receivable Office, 79 Elm Street, Hartford, Connecticut 06106-5127, and shall be by certified or bank check payable to "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 in the Bureau of Materials Management and Compliance Assurance at the same address.
11. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this Consent Order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved,



and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under this Consent Order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purpose to this Consent Order. Nothing in this paragraph shall excuse noncompliance or delay.

12. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or a representative of the Commissioner.
13. 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.
14. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Consent Order shall be signed by Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in § 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and Respondent or Respondent's chief executive officer and each such individual shall certify in writing as follows:

*"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 53a-157b of the Connecticut General Statutes and any other applicable law."*
15. Noncompliance. This Consent Order is a final order of the Commissioner with respect to the matters addressed herein, and is non-appealable and immediately enforceable. Failure to comply with this Consent Order may subject Respondent to an injunction and penalties.
16. 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.
17. Notice of transfer; liability of Respondent and others. 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 operations which are the subject of this Consent Order, the site or the business, or 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.

18. Commissioner's powers. 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 violations of law, including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this Consent Order have not fully characterized the extent and degree of pollution or have not 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 pollution.
19. Respondent's obligations under law. Nothing in this Consent Order shall relieve Respondent of other obligations under applicable federal, state and local law.
20. 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.
21. 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.
22. No effect on rights of other persons. This Consent Order shall neither create nor affect any rights of persons who or municipalities which are not parties to this Consent Order.
23. 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.
24. 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.



25. Submission of documents. Any document required to be submitted to the Commissioner under this Consent Order shall, unless otherwise specified in writing by the Commissioner, be directed to:

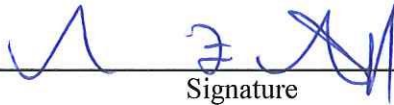
Darlene Sage, Environmental Analyst II  
Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
Waste Engineering and Enforcement Division  
79 Elm Street  
Hartford, Connecticut 06106-5127

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

Circle of Life, LLC.

BY:

  
Signature

Andrew F. Anastasio, Jr., Manager/Member

1/3/19  
Date

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

  
Robert Klee  
Commissioner

*Betsy Wingfield  
Bryan Christ*

1/10/19  
Date

CONSENT ORDER No. COWSWDS19001

City of New Haven Land Records

Sent Via Electronic Certified Mail



Attachment A: Site Plan depicting limited area for the Facility's railcar storage

Clarence Blar Associates, Inc.  
Civil Engineers & Land Surveyors  
241 Quaker Avenue - New Haven, CT 06460  
202-467-2793

Clarence Watti Associates, PC  
Consulting Engineers  
1000 N. Main Street, Suite 100  
New Haven, CT 06510  
203-325-1825

RECEIVED  
JAN 17 2020  
NEW HAVEN, CT  
STATE OF CONNECTICUT  
DEPARTMENT OF TRANSPORTATION

Station 40+0 to 45+0  
Site Development Plan

As Shown June 2017		11/2/17
3	General - in Progress	
2	70/50 Project Notebook	11/2/17
1	General - for Valuation Work	11/2/17
	Revised/ Issue	

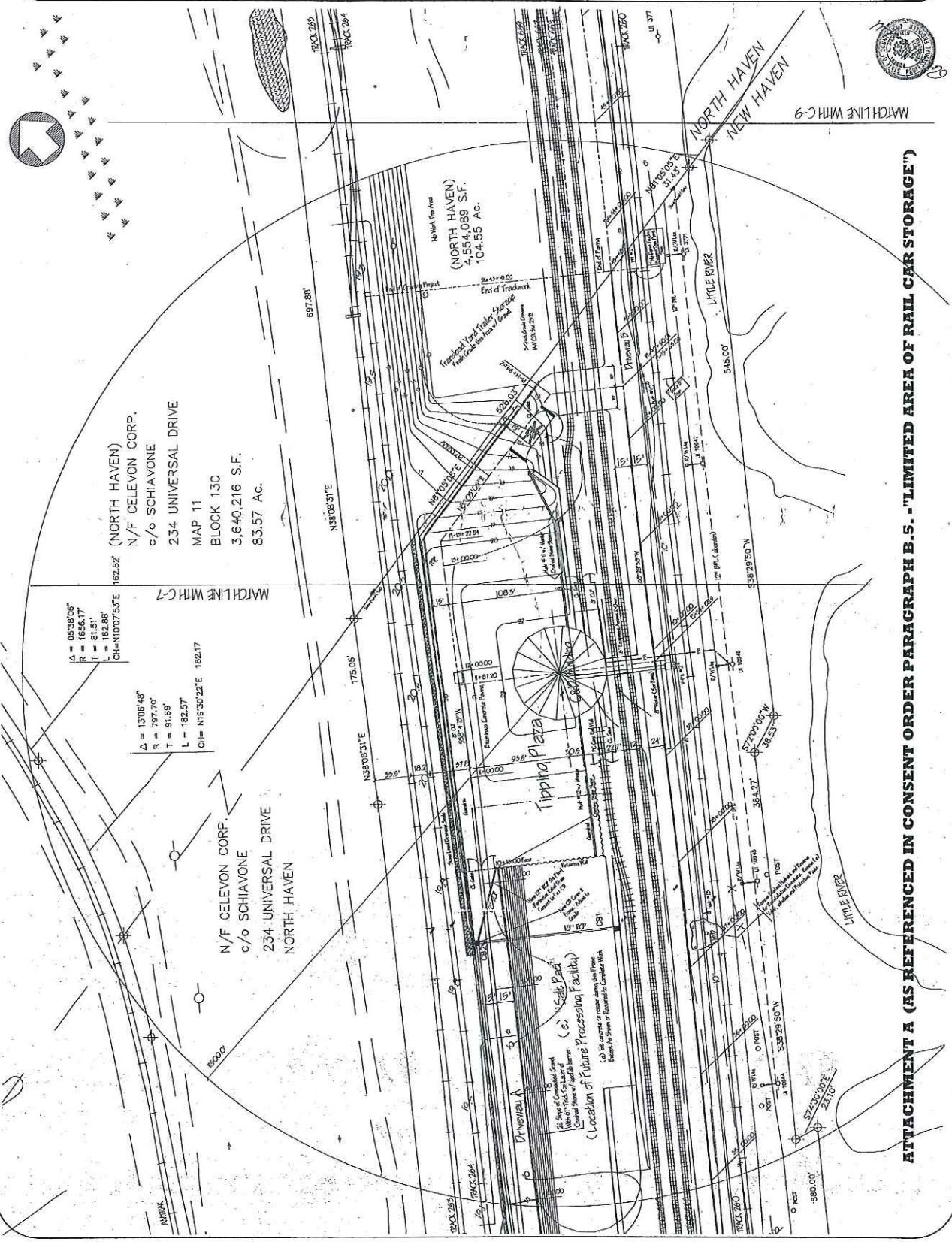
Burial facilities group, Inc.  
Project Engineers  
70 New Haven Avenue, Suite 100  
New Haven, CT 06510  
203-325-1825

Mark Robinson National Associates  
National Associates  
1000 N. Main Street, Suite 100  
New Haven, CT 06510  
203-325-1825

Circle of Life, LLC  
1000 N. Main Street, Suite 100  
New Haven, CT 06510  
203-325-1825

Knight, Marshall, Fiske & Associates  
Project Engineers  
1000 N. Main Street, Suite 100  
New Haven, CT 06510  
203-325-1825

Project	001829	C-8
Date	19 Sept 00	
Scale	1"=400'	



ATTACHMENT A (AS REFERENCED IN CONSENT ORDER PARAGRAPH B.5. - "LIMITED AREA OF RAIL CAR STORAGE")



Attachment B: 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, newspapers, 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:
2. Recycling Contact:
3. Additional Contact:

Mailing Address:

City/Town:

State:

Zip Code:

Title:

Phone(s):

Email:

Title:

Phone(s):

Email:

### Part II: Facility/Operations

1. Type of business:
2. Number of buildings:
3. Total square footage of building(s)

4. Acreage of lawn area::
5. Number of employees:



## Part II: Facility/Operations (continued)

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

Name:

Name:

Name:

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

7. Building Owner:

Mailing Address:

Phone:

Phone:

Phone:

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
<b>EXAMPLE:</b> 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 (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
<b>EXAMPLE:</b> <i>Old Corrugated Cardboard</i>	<i>We have a 4-yard dumpster behind our main warehouse. It's picked up twice a week.</i>	<i>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.</i>	<i>Our current trash hauler, (NAME) empties cardboard dumpster on Mondays and brings it to a properly permitted facility (PERMITEE NAME) in (TOWN) for recycling.</i>
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
<i>EXAMPLE:</i> Printer Toner cartridges	<i>We have 8 printers in our offices and generally replace/recycle 1/month</i>	<i>Office manager returns all toner cartridges to Office Supply Store for a credit towards future office supplies</i>	<i>Use mailer envelopes that come with new toner. We mail them back to Office supply store (or they pick up with new deliveries).</i>
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 (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)</b>	<b>HOW &amp; WHERE MATERIAL IS COLLECTED</b>	<b>WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING</b>
<i>EXAMPLE: Leaves and other yard debris</i>	<i>N/A</i>	<i>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).</i>	<i>Our landscape company (NAME) takes them away to a properly permitted recycling facility. (PERMITTEE NAME, LOCATION).</i>
<b>Leaves**</b>			
<b>Grass clippings**</b>			
<b>Brush, stumps and other yard debris</b>			
<b>Food waste</b>			
<b>Other</b>			
<b>Other</b>			

\*\* 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
<i>EXAMPLE: Waste Reduction</i>	<i>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.</i>
Waste Reduction	
Waste Reduction	
Other	
<i>EXAMPLE: ReUse</i>	<i>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.</i>
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?
<i>EXAMPLE:</i> Food and Beverage containers (glass, metal and plastic)	25 gallons/month	<i>We'll place barrel in break room; janitorial staff will empty and remove materials to a larger container on our loading dock.</i>	<i>There are a lot of 5¢ deposit containers. We're looking into having a local non-profit organization collect them for free and redeem the deposits.</i>	<i>We will start this program by August 8, 2008 (2 weeks from now).</i>
<i>EXAMPLE:</i> 55 gallon drums	10/week	<i>We generate 55 gallon drums, which contained non-hazardous substances. We stockpile them outside the plant until we have 50 drums.</i>	<i>Working with XYZ, a company that reconditions the drums. We've found this to be more cost effective than recycling them at this time.</i>	<i>We've already started collecting and expect our first pick up to be next week (June 5, 2008)</i>

Part V: Recycling & Recovery Programs Planned (continued)

IDEA / MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIAL BE COLLECTED?	WHO WILL PICK-UP THIS MATERIAL? FINAL/END MARKET?	WHEN WILL PROGRAM BE IMPLEMENTED?
EXAMPLE: 5 gallon buckets	15-30 <u>buckets/month</u>	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 06106-5127

PHONE: (860) 424-3365