

STATE OF CONNECTICUT

V.

NYLO METAL FINISHING, LLC

UNILATERAL ORDER NO. WSWDH19003

Date Issued: 2/21/2019

- A. The Commissioner of Energy and Environmental Protection ("the Commissioner") finds:
1. NYLO Metal Finishing, LLC ("Respondent") is a Connecticut 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 730 North Main Street, Waterbury, Connecticut 06704.
 3. Respondent is or has engaged in the business of conducting commercial metal finishing operations at 730 North Main Street, Waterbury, Connecticut and more fully described as Assessor's Map 0237, Block 0166 and Lot 0024 on the Property Records of the City of Waterbury, Connecticut. The property will hereinafter be referred to as the "Site".
 4. Respondent is or has operated as a large quantity generator of hazardous waste at the site.
 5. Staff from the Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division ("WEED") conducted an inspection at the Site on April 19 & 27, 2018. Based upon the inspection, WEED found that the Respondent failed to:
 - a. **Perform hazardous waste determinations on all solid waste generated at the Site, as required by Section 22a-449(c)-102(a)(2)(A) of the Regulations of Connecticut State Agencies ("RCSA") incorporating (with specified changes) Title 40 of the Code of Federal Regulations ("CFR") 262.11.** Specifically, hazardous waste determinations had not been performed on: 1) 14, 55-gallon containers of waste being managed in the hazardous waste storage area; 2) waste's being managed in three former process tanks currently used at the Site to accumulate and/or evaporate waste; and 3) tramp oil skimmed off the alkali cleaning tanks used at the Site. In addition, the inspection found that the Waste Profiles reviewed did not appear to include the waste code F019 associated with partially evaporated aluminum anodize wastewater generated on-site.
 - b. **Develop and follow a written inspection schedule, as required by Section 22a-449(c)-102(b)(2) of the RCSA, incorporating 40 CFR 265.15(b)(1).** Specifically, WEED found that while the Respondent had developed a written inspection schedule for the hazardous waste storage area, a written inspection schedule had not been developed for other areas of the Site

where hazardous wastes are managed including, but not limited to, the “process area” where hazardous wastes are stored and/or treated in tanks and containers.

- c. **Record inspections in a log or summary, as required by Section 22a-449(c)-102(b)(2) of the RCSA, incorporating 40 CFR 265.15(d).** Specifically, WEED found that the Respondent ceased recording hazardous waste inspections in September 2017.
- d. **Ensure that containers of hazardous waste stored at the Site are managed within a containment system, as required by Section 22a-449(c)-102(a)(2)(E) of the RCSA, incorporating 40 CFR 264.175.** Specifically, WEED found that numerous containers of hazardous waste were being stored in the hazardous waste storage area and in the process area of the Site without the required secondary containment.
- e. **Clearly mark containers of hazardous waste with the date upon which accumulation began, as required by Section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.34(a)(2).** Specifically, WEED found that numerous containers of hazardous waste managed in the hazardous waste storage area and the process area were not marked with the date identifying when waste began accumulating in such containers.
- f. **Mark containers of hazardous waste with the words “Hazardous Waste” and a description of their contents, as required by Section 22a-449(c)-102(a)(2)(J) of the RCSA, incorporating (with specified changes) 40 CFR 262.34(a)(3).** Specifically, WEED found that numerous containers of hazardous waste managed in the hazardous waste storage area and the process area were not marked with the words “hazardous waste” and/or with words describing the contents of the container.
- g. **Keep containers of hazardous waste closed except when adding or removing waste, as required by Section 22a-449(c)-102(a)(2)(E) of the RCSA, incorporating 40 CFR 265.173(a).** Specifically, WEED found that numerous containers of hazardous waste managed in the hazardous waste storage area and the process area were not closed at the time of inspection.
- h. **Maintain adequate aisle space in the area where hazardous waste is stored, as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating 40 CFR 265.35.** Specifically, WEED found that the hazardous waste storage area was filled with old equipment so that waste containers could not be easily accessed for inspection and/or emergency purposes.
- i. **Adequately separate containers of hazardous wastes from incompatible material stored nearby, as required by Section 22a-449(c)-102(a)(2)(E) of the RCSA, incorporating 40 CFR 265.177.** Specifically, WEED found two totes containing acid waste were stored in close proximity to a tote and a drum of alkali waste (black oxide) without adequate means of protection (i.e., dike, berm, wall, etc.).
- j. **Obtain a permit prior to storing hazardous waste, as required by Section 22a-449(c)-110(a)(2)(A) of the RCSA, incorporating 40 CFR 270.1(c).** Specifically, WEED found that numerous containers of hazardous waste were being stored at the Site for a period exceeding 90 days without the Respondent having been issued a RCRA Part B storage permit.
- k. **Obtain a permit prior to treating hazardous waste, as required by Section 22a-449(c)-110(a)(2)(A) of the RCSA, incorporating 40 CFR 270.1(c).** Specifically, WEED found that hazardous waste was being treated in tanks at the time of inspection without the Respondent

having been issued a Resource Conservation and Recovery Act ("RCRA") Part B treatment permit.

- l. **Provide a hazardous waste tank system with secondary containment, as required by Section 22a-449(c)-102(a)(2)(F) of the RCSA, incorporating 40 CFR 265.192.** Specifically, WEED found that at least one hazardous waste tank system being operated in the process area was not provided with secondary containment.
- m. **Mark tanks of hazardous waste with the words "Hazardous Waste" and a description of their contents, as required by Section 22a-449(c)-102(a)(2)(J) of the RCSA, incorporating (with specified changes) 40 CFR 262.34(a)(3).** Specifically, WEED found that at least five (5) tanks managing hazardous waste in the process area were not marked with the words "hazardous waste" or with a description of the waste as required.
- n. **Provide training to employees involved in the management of hazardous waste at the Site, as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating 40 CFR 265.16.** Specifically, WEED found no documentation to demonstrate that Respondent's employees had been provided with adequate hazardous waste management training.

6. By virtue of the above, the Respondent has violated RCSA Section 22a-449(c)-100, et. seq.
7. On July 18, 2018, WEED issued Notice of Violation No. WSWDH18031 to the Respondent to correct the violations corresponding to those cited in subparagraphs A.5.a. and A.5.n. of this order.
8. On September 10, 2018, WEED received a submittal to Notice of Violation No. WSWDH18031 in which Respondent has reported that violations A.5.e., A.5.f., A.5.g., and A.5.k. of this order were addressed.

B. The Commissioner, acting under Sections 22a-6 and 22a-449 of the Connecticut General Statutes, orders Respondent as follows:

1. Compliance Assurance. Respondent shall bring all violations identified in paragraph A.5. above into compliance and shall maintain its compliance with all applicable provisions of the RCSA Sections 22a-449(c)-100, et. seq. including, but not limited to, those regulations identified in paragraph A.5. above. In particular:
 - a. Retention of Consultant: On or before **thirty (30) days** after the issuance of this order, the Respondent shall identify, for the Commissioner's review and written approval, one or more qualified consultant(s) to prepare the documents and oversee the actions required by this order. The Respondent shall retain one or more qualified consultants as approved by the Commissioner until they comply with this order. Within ten (10) days after retaining any qualified consultant(s) 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(s) from the Commissioner. In order to seek approval of a qualified consultant(s), 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 order. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
 - b. Correction of Violations: On or before **forty-five (45) days** of approval of the qualified consultant, Respondents shall perform all actions which it failed to perform as specified in paragraph A.5. of

this order, and shall submit for the Commissioner's review and written approval certification of compliance with the hazardous waste management requirements specified in those subparagraphs, and documentation demonstrating such compliance.

- c. Compliance Plan: On or before **ninety (90) days** of approval of the qualified consultant, 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 Connecticut's hazardous waste management regulations RCSA Section 22a-449(c)-100, et. seq.; including, but not limited to, those set forth in paragraph A.5. of this order. In addition, the plan shall include specifics with respect to whose responsibility it will be to comply with Connecticut's hazardous waste management regulations and what practices will be put into place to assure compliance with such regulations is achieved at the Site. Within five (5) days after the Commissioner approves such plan, Respondent shall carry out the plan and maintain it in full effect thereafter.
 - d. Recycling Profile: On or before **ninety (90) days** after issuance of this order, Respondent shall conduct a comprehensive recycling review of the Site 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 Site. Refer to the enclosed Business Recycling Profile (Attachment A).
2. Full compliance. Respondent shall not be considered in full compliance with this order until all actions required by this order have been completed as approved and to the Commissioner's satisfaction.
 3. Sampling and sample analyses. All sampling and sample analyses which, are required by this 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.
 4. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this 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 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 order. Nothing in this paragraph shall excuse noncompliance or delay.
 5. Definitions. As used in this order, "Commissioner" means the Commissioner or a representative of the Commissioner.
 6. Dates. The date of "issuance" of this order is the date the 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 order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this 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 order, the word "day" as used in this order means calendar day. Any document or action which is required by this 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.

7. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this 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."

8. False statements. Any false statement in any information submitted pursuant to this order may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.
9. Notice of transfer; liability of Respondent. Until Respondent has fully complied with this 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 order or after obtaining a new mailing or location address. Respondent's obligations under this order shall not be affected by the passage of title to any property to any other person or municipality.
10. Commissioner's powers. Nothing in this 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 described in this order. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this 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 pollution.
11. Respondent's obligations under law. Nothing in this order shall relieve Respondent of other obligations under applicable federal, state and local law.
12. No assurance by Commissioner. No provision of this 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 order will result in compliance or prevent or abate pollution.
13. 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 order.

14. No effect on rights of other persons. This order neither creates nor affects any rights of persons or municipalities that are not parties to this order.
15. 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 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.
16. 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 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.
17. Submission of documents. Any document required to be submitted to the Commissioner under this order shall, unless otherwise specified in this consent order or in writing by the Commissioner, be directed to:

Mr. Paul Franson, Environmental Analyst 3
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

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


Katherine S. Dykes
Commissioner

Department of Energy and Environmental Protection


Date

Unilateral Order No. WSWDH19003

Sent via electronic certified mail

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, 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:

Mailing Address:

2. Recycling Contact:

Phone(s):

3. Additional Contact:

Phone(s):

City/Town:

Title:

Email:

Title:

Email:

State:

Zip Code:

Part II: Facility/Operations

1. Type of business:

2. Number of buildings:

3. Total square footage of building(s)

4. Acreage of lawn area::

5. Number of employees:

Part II: Facility/Operations (continued)

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

Name:

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.
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 (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Old Corrugated Cardboard	We have a 4-yard dumpster behind our main warehouse. It's picked up twice a week.	Warehouse staff collect and flatten boxes as we go along. A small pile is created during a shift (we have 3 shifts/day). At the end of the shift an employee removes the small pile and brings to dumpster outside.	Our current trash hauler, (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) <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 (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Leaves and other yard debris	N/A	Our landscape company (NAME, TOWN) mows our lawns and maintains our entry garden. They remove all the materials (although grass clippings are left on the lawn).	Our landscape company (NAME) takes them away to a properly 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
<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?
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 <u>buckets/month</u>	We generate buckets (<u>contained non-hazardous substances</u>) 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