

SECTION II PERMITTED ACTIVITIES

This Permit authorizes the Permittee to operate a RCRA Hazardous waste treatment, storage and disposal facility. As used in this Permit, the terms “management” or “Storage” shall not be construed to authorize any activity that is not explicitly authorized by this Permit. This Permit authorizes the Permittee to perform storage and management of Hazardous Waste and Other Materials within the Centralized Waste Storage and Transfer Facility (“CWS&TF”), as described herein. Figure II-1, *Centralized Waste Storage and Transfer Facility*, presents the Waste Management Units (“WMUs”). The permitted WMUs include twenty (20) Container Storage Areas, eight (8) thirty cubic yard Roll-Off Containers, four (4) Staging Areas, four (4) Truck Pads with Loading and Unloading Areas, four (4) Satellite Accumulation Areas and a Tank Storage Area with fourteen (14) Tanks.

(A) WASTE MANAGEMENT UNITS

(1) CONTAINER STORAGE AREA (“CSA”)

- (a) Authorized Activity. The Permittee is authorized to use the twenty (20) CSAs to accumulate Wastes and any Other Material that is not prohibited by this Permit.
- (b) Permitted Capacity
 - (i) The Permittee shall ensure that at any one time, the total volumetric storage capacity of the CSAs within the CWS&TF shall not exceed 59,400 gallons of Hazardous Waste.

The total combined volumetric storage capacity for all the Hazardous Waste Containers and Hazardous Waste Roll-Off Containers (containerized Wastes excluding the Satellite Accumulation Area Containers as described in Section II(A)(5) of this Permit) shall not exceed 59,400 gallons.
 - (ii) The maximum Storage capacities for each CSA in the CWS&TF are as identified in Table II-1, *Container Storage Areas*.
 - (iii) For purposes of determining compliance with the volume capacity limit, each Container in a CSA shall be assumed full.

(c) Secondary Containment

- (i) The Permittee shall ensure that each CSA has a secondary containment volume with at least 10 percent of the total volume of all the wastes or 100 percent of the largest container, whichever is greater. Figure II-1, *Centralized Waste Storage and Transfer Facility*, presents a cross-section of a typical container storage area containment system, a recessed containment sump for the collection of the materials, and the dimensions of the areas and container layout.
 - (ii) The Permittee shall ensure the containment systems are constructed of concrete, the bases and berm are pitched, and each area has a recessed containment sump for the collection of Spilled Wastes.
 - (iii) The Permittee shall ensure that each CSA has a coat of a protective chemical resistant material, consistent with Section III(A)(8) of this Permit, that is chemically resistant to the Wastes managed in each CSA.
- (d) Permitted Wastes. In addition to the Specific Prohibitions specified in Section II (B)(1) below, the Permittee shall not allow any Waste in the CSA other than those Wastes described in Section II (B)(2), where such Wastes are either Wastes generated at the Facility or brought to the CWS&TF from other RTX sites.
- (e) Prohibited Wastes. The Permittee shall not allow any of the Wastes, Other Materials or products specifically prohibited by this Permit in Section II (B)(1), Specific Prohibitions, to be brought to or be placed within the CSA.

(2) ROLL-OFF CONTAINERS

- (a) Authorized Activity. The Permittee is authorized to use Roll-Off Containers in Truck Pads 1, 2, 3 and 4 of the CWS&TF to accumulate contaminated media, construction debris, spent filters, Scrap Metal, unwanted wood and any Other Material in Roll-off Containers that is not prohibited by this Permit in Roll-Off Containers.
- (b) Permitted Capacity. The Permittee shall not allow, at any one time, more than eight (8) 30 cubic-yard Roll-off Containers at any one time (two (2) Roll-Off Containers per Truck Pad). The Truck Pads may have a combination of Hazardous Waste and Non-Hazardous Waste. However, Non-Hazardous Waste Roll-Off Containers shall not exceed eight (8) Roll-Off Containers or 240 cubic yards at any one time.

The total combined volumetric storage capacity for all the Hazardous Waste Containers in the CSA and Hazardous Waste Roll-Off Containers (containerized Wastes excluding the Satellite Accumulation Area Containers as described in Section II(A)(5) of this Permit) shall not exceed 59,400 gallons.

- (c) Secondary Containment. The Roll-Off Containers shall be located on a base that has sufficient strength to withstand the weight of the Roll-Off Container and its content.
- (d) Permitted Wastes. The Permittee shall not bring to, Store, treat, mix, bulk, dispose of, or engage in the management of any Waste, Other Material or product in Roll-Off Containers other than the permitted Wastes (solids or semi-solid, but not liquid) presented in Section II(B)(2), where such Wastes are either Wastes generated at the Facility or brought to the CWS&TF from other RTX sites.
- (e) Prohibited Wastes. The Permittee shall not allow any of the Wastes, Other Materials or products specifically prohibited by this Permit in Section II (B)(1), Specific Prohibitions, to be brought to or be placed in Roll-Off Containers. In addition, the Permittee shall ensure that Waste stored in Roll-Off Containers contain no free draining liquids except for trap liquids incidental to waste settling.

(3) STAGING AREAS

- (a) Authorized Activity. The Permittee is authorized to temporarily stage containerized Waste or Other Material in four (4) designated Staging Areas in the CWS&TF for a period not to exceed five (5) calendar days while in transition to either the CSA or packaged for offsite shipment.
- (b) Permitted Capacity. The Permittee shall ensure that at any one time, the total volumetric combined Storage capacity of the four (4) Staging Areas shall not exceed the maximum volumetric Storage capacity presented in Table II-2, *Container Staging Areas*.

For purposes of determining compliance with the volume capacity limit, each Container in the Staging Area shall be assumed full.

- (c) Secondary Containment. The Permittee shall ensure that the four (4) Staging Areas have ten (10) containment areas with secondary containment volumes equal to at least 10 percent of the total volume of all the Waste or Other Material or 100 percent of the largest Container, whichever is greater. The calculations for containment volumes of each of the Staging Areas are presented on Figure II-1, *Centralized Waste Storage and Transfer Facility*.

- (d) Permitted Wastes. The Permittee shall not bring to, Store, treat, mix, bulk, dispose of, or engage in the management of any Waste, Other Material or product in the Staging Areas other than the staging of permitted Wastes or Other Materials described in Section II(B)(2), where such Wastes are either Wastes generated at the Facility or brought to the CWS&TF from other RTX sites.
 - (e) Prohibited Wastes. The Permittee shall not allow any of the Wastes, Other Materials or products specifically prohibited by this Permit in Section II(B)(1), Specific Prohibitions, to be brought to or be placed within the Staging Areas.
- (4) TRUCK PADS WITH LOADING AND UNLOADING AREAS
 - (a) Authorized Activity. The Permittee is authorized to load and unload containerized waste in any of the four (4) designated truck pads located in the CWS&TF.
 - (b) Permitted Capacity. The CWS&TF shall have four (4) truck pads with loading and unloading areas. Two (2) truck pads shall be used for acids, alkali and cyanide Wastes, and two (2) truck pads for oils, solvents and PCB Wastes.
 - (c) Secondary Containment. The Permittee shall maintain sloped floors draining towards a sump with a capacity to hold the accumulated volume of the largest container handled at the Facility (i.e., 330-gallon container).
 - (d) Permitted Wastes. The Permittee shall not bring to, Store, treat, mix, bulk, dispose of, or engage in the management of any Waste, Other Material or product in the Truck Pads with Loading and Unloading Areas other than the permitted Wastes or Other Material presented in Section II(B)(2), where such Wastes or Other Material are either generated at the Facility or brought to the CWS&TF from other RTX sites.
 - (e) Prohibited Wastes. The Permittee shall not allow any of the Wastes, Other Materials or products specifically prohibited by this Permit in Section II (B)(1), Specific Prohibition, to be brought to, placed within or to enter the Truck Pads with Loading and Unloading Areas.
- (5) SATELLITE ACCUMULATION AREAS
 - (a) Authorized Activity. The Permittee is authorized to use and maintain up to four (4) satellite accumulation areas located in the CWS&TF. The Area Numbers are 20, 21, 24, and 25/26.

- (b) Permitted Capacity. The maximum volumetric capacity for each Satellite Accumulation Area is up to 55-gallon of Waste per waste stream per Satellite Accumulation Area at any one time.
- (c) Permitted Wastes. The Wastes authorized for Storage in Satellite Containers in Satellite Accumulation Areas are Wastes incidental to Waste handling such as spent rags, personal protective equipment (gloves, rubber boots, tyvek suits, etc.) and any Other Material generated from Waste management.

(6) TANK STORAGE AREA

- (a) Authorized Activity. The Storage, processing and management of Hazardous Wastes or Other Materials in Tank Systems shall be limited to the layout shown on Figure II-1, *Centralized Waste Storage and Transfer Facility*.
- (b) Permitted Capacity. The Permittee shall ensure that at one time, the total combined volumetric capacity for the fourteen (14) permitted Tanks in the CWS&TF does not exceed 84,000 gallons. Table II-3, *Tank Storage Areas*, outlines the maximum volumetric capacities, materials of construction, tank liner materials and typical type of Wastes Stored for each Tank in the CWS&TF.
- (c) Secondary Containment. The Permittee shall ensure that each of the Tank containment areas has a volumetric capacity of 6,480 gallons of liquid. The containment volume calculations for the Tank Storage Areas are presented on Figure II-1, *Centralized Waste Storage and Transfer Facility*.
- (d) Permitted Wastes. In addition to the Specific Prohibitions specified in Section II(B)(1) below, the Permittee shall not allow any Waste in the Tank Systems other than those Wastes permitted in Section II(B)(2), where such Wastes are either Wastes generated at the Facility or brought to the CWS&TF from other RTX sites.

(B) CHEMICAL MANAGEMENT

- (1) Specific Prohibitions. The Permittee shall not allow any of the following Wastes, Other Materials or products to be brought to, processed or be managed anywhere within the CWS&TF.
 - (a) Infectious materials, as defined in 49 CFR 173.134;
 - (b) Materials that are Poison by Inhalation, as defined in 49 CFR 173.115, 173.132 and/or 173.133;
 - (c) Radioactive materials, as defined in 49 CFR 173.403;
 - (d) Cryogenic liquids, as defined in 49 CFR 173.115(g);

- (e) Any forbidden hazardous material identified in 49 CFR 173.21 and 173.54;
- (f) Materials that are pyrophoric or ignites spontaneously;
- (g) Listed and characteristic wastes with a Reactivity Hazard rating of 4, as defined by the National Fire Protection Association (NFPA) 704, Degree of Hazard Criteria, most recent edition.
- (h) Listed and Characteristic wastes with a Health Hazard rating of 4; as defined by the NFPA 704, Degree of Hazard Criteria, most recent edition.
Note: The degree of hazard for specific chemicals specified in this Section II (B) (1) (f) shall be found in NFPA 325 M and NFPA 49 or the equivalent in the HMIS system.
- (i) Shock sensitive materials, defined as materials that are readily capable of detonation or explosive decomposition or reaction at normal temperatures and pressures. And, sensitive materials to mechanical or localized thermal shock at normal temperatures and pressures, including materials designated by the NFPA 704 as having a Reactivity Hazard Rating of 4 (See NFPA 704, most recent edition).
- (j) Special Hazards: The limits identified below are maximum Storage quantity of the combined total of both Liquids and solids Wastes present at the Permittee's WMUs. These limitations apply per WMU.
 - (i) Liquid and Solid Oxidizing Materials, as defined in NFPA 55;
 - (1) Class 1 and 2 oxidizers, except as provided for herein:
 - (a) Staging of oxidizers shall be allowed in Staging Area 211.
 - (b) Container Storage Areas 327 and 328, shall be allowed to store Class 1 and Class 2 oxidizers up to a maximum of 2,200 gallons per location not to exceed 4,000 gallons. Storage Areas 330 and 331 may be utilized to store oxidizers if the Permittee complies with the implementations procedures at the time of changing the Waste type in a Container Storage Area. At no time, oxidizers shall exceed 8,000 gallons (80,000 pounds) in the CWS&TF.
 - (c) Tank Storage of oxidizers is restricted to Tank 101 and with a maximum storage capacity of 40,000 pounds (4,000 gallons). In cases where Tank 101 has been taken out-of-service for reasons documented in the Facility Operating Record, P&W is permitted to use Tank 102 as necessary, in accordance with prohibitions set forth here and in Section III. Acid mixtures that are not oxidizers and compatible with Tank 101 may be Stored in Tank 102. At no time shall Tank 101 and Tank 102 be utilized concurrently for the Storage of Class 1 and 2 oxidizers, except during transfer of Waste

from Tank 101 and Tank 102 when Tank 101 is taken out of service, and during transfer from Tank 102 to Tank 101 when Tank 101 is returned to service;

- (2) Class 3 oxidizers in excess of 200 pounds; and
- (3) Class 4 oxidizers in excess of 10 pounds.
 - (ii) Organic Peroxide Formulations, as defined in NFPA 55;
Class I Organic Peroxides, are prohibited
Class II Organic Peroxides, are prohibited
Class III Organic Peroxides in excess of 1,500 pounds, and
Class IV Organic Peroxides in excess of 100,000 pounds.
 - (iii) Gaseous Oxidizers, as defined in NFPA 55.
- (k) Any waste or other materials with VO Concentration equal to or greater than 500 parts per million by weight is prohibited for Storage in any of the Tanks listed in Table 2, *Tank Storage Areas*, unless the Permittee complies with Subparts BB and CC requirements.
- (2) Permitted Wastes and Other Materials. Provided it is not otherwise prohibited by this Permit, Section II (B)(1), only the following Wastes or Other Materials are permitted in the CWS&TF.
 - (a) The following Hazardous Wastes, identified by the EPA Hazardous Waste identification code(s) are permitted for Storage in the Waste Management Areas described in Section II (A) providing the Permittee first complies with Section II (B)(3)(a) and II (B)(3)(b):

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F001, F002, F003, F004, F005, F006, F007, F008, F009, F019

P001*, P029, P030, P031, P042*, P075*, P081*, P098, P104, P105, P106

*These waste codes will only be managed in small lab pack quantities.

U002, U019, U021, U031, U032, U044, U052, U055, U056, U077, U080, U108, U112, U117, U121, U122, U133, U134, U138, U140, U144, U151, U154, U159, U161, U165, U188, U201, U210, U211, U220, U223, U226, U228, U239

- (b) Universal Waste as defined in RCRA Section 22a-449(c)-113. These wastes are:
 - (i) Batteries
 - (ii) Thermostats
 - (iii) Lamps
 - (iv) Used electronics
 - (v) Pesticides
 - (c) Non-RCRA Hazardous Wastes (Connecticut Regulated Wastes) as defined under the CGS Section 22a-448. These Wastes are:
 - (i) Waste PCBs, waste code CR01;
 - (ii) Waste oil, waste code CR02;
 - (iii) Waste water soluble oil, waste code CR03;
 - (iv) Waste chemical liquids, waste code CR04; and
 - (v) Waste chemical solids, waste code CR05.
 - (d) Used Oil.
 - (e) Other Material(s) (e.g., commercial chemicals from technical, analytical reagent, grade chemicals, chemical intermediates, products, and any chemical mixture), except where otherwise prohibited by this Permit, (e.g., shock sensitive materials) may be treated, Stored, processed and managed in the WMUs.
 - (f) Lab Pack Wastes. Include expired or spent materials, unused products or materials, and laboratory wastes that are Hazardous Wastes identified by the Waste codes in 40 CFR Part 261, Subpart C and D, specified in Section II(B)(2)(a) of this Permit.
 - (g) Waste or other materials containing PCB. This includes any PCB item.
 - (h) Scrap Metals, as defined in this Permit.
- (3) Permitted Waste Management
- (a) The Permittee may Store and manage Wastes and Other Materials (e.g., commercial chemicals from technical, analytical reagent, grade chemicals, chemicals intermediates, products, Non-Hazardous Wastes and any chemical mixture), except where otherwise prohibited by this Permit (e.g., shock sensitive materials) in the CWS&TF provided that the Permittee first complies with the conditions listed in Section II(B)(3)(b) of this Permit.
 - (b) Prior to placing into the CWS&TF any Wastes or Other Materials, the Permittee shall determine that the materials can be properly managed in accordance with the terms and conditions of this Permit. At a minimum, the Permittee shall:

- (i) Demonstrate that each Waste or Other Material is not specifically prohibited by Section II(B)(1) and the applicable degree of hazard as defined in the Waste Analysis Plan, incorporated herein as Attachment A, has been determined for each Waste or Other Material.
 - (ii) Characterize each Waste or Other Material for those parameters specified in the Waste Analysis Plan, incorporated herein as Attachment A.
 - (iii) Verify, using the procedures specified in the Waste Analysis Plan, incorporated herein as Attachment A, that each Waste or Other Material is compatible with all co-stored materials.
 - (iv) Demonstrate that each Waste or Other Material is being Stored in an appropriate Container or Tank System as required by Section III(B)(1) for Containers or Section III(B)(5) for Tanks by, at a minimum, review of available data, that the Tank System or Container is compatible with the Stored Waste or Other Material.
 - (v) Demonstrate that each Waste or Other Material is compatible with the containment structure or other device as required by Section III(B) by, at a minimum, review of available data (e.g., manufacturer's specifications), that the Waste or Other Material is compatible with the coating used on the containment structure.
 - (vi) Demonstrate that the Contingency Plan, incorporated herein as Attachment E adequately addresses all potential hazards posed by each Waste or Other Material, specifically considering the suitability and compatibility of this material with protective clothing (e.g., boots, gloves, suits, etc.), availability of appropriate respirator protection and emergency response equipment, monitoring equipment (explosion detection equipment, vapor analyzers, dragger tubes, etc.) and other relevant equipment and includes necessary response procedures by, at a minimum, identifying PPE required to properly handle the Waste and Other Material, and identifying the appropriate response procedures for handling incidents involving the Waste or Other Material and incorporate the above in the Contingency Plan, incorporated herein as Attachment E
 - (vii) Maintain a computerized Waste Information Management System ("WIMS") or equivalent for each Waste or Other Material approved for Storage or management to be located with all necessary reference material as indicated in the Contingency Plan, incorporated herein at Attachment E, to be used in the event of an incident requiring the implementation of such plan.
- (c) The information used to make the demonstrations required by Section II (B)(3)(b)(ii) shall be clearly documented and maintained in the Facility Operating Record until Final Closure of the CWS&TF.

- (d) The Permittee shall Store and manage Universal Wastes in accordance with RCSA Section 22a-449(c)-113.
- (e) The Permittee shall Store and manage Non-Hazardous Waste codes CR01, CR02, CR03, CR04 and CR05.
- (f) The Permittee shall Store and manage Used Oil in accordance with RCSA Section 22a-449(c)-119.
- (g) The Permittee shall Store and manage Scrap Metal as defined in this Permit.

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