



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 1, 1995

Mr. Robert Silvestri
Manager, Environmental Operations & Safety
United Illuminating
P.O. Box 1564
New Haven, CT 06506-0901

Dear Mr. Silvestri:

The Bureau of Waste Management has received your recent correspondence (letter dated January 11, 1995) describing United Illuminating's (UI) procedures for managing and disposing of Manhole/Conduit Clean-out Waste sludge generated during routine and emergency electrical repair work conducted by UI's Underground Department.

The Department hereby approves of the proposed management plan for this waste material and UI should implement the procedures in accordance with said plan.

Please contact Ms. Inga Rubecka at 424-3366 for information regarding the issuance of an EPA ID Number for a large quantity generator and Ms. Patricia Gray at 424-3372 for information pertaining to Special Waste Permits.

The Bureau of Waste Management appreciates your continued cooperation in the proper management and handling of waste materials generated at United Illuminating.

Sincerely,

Richard J. Barlow

Richard J. Barlow
Chief
Bureau of Waste Management

RJB/dkm

January 11, 1995

Mr. Richard J. Barlow
Chief
Waste Management Bureau
State of Connecticut
Department of Environmental Protection
79 Elm St.
Hartford, CT 06106-5127

Dear Mr. Barlow:

I have received the copy of your letter dated January 5, 1995 regarding Manhole/Conduit Clean-out Waste(sludge) and appreciate the Department's recommended procedure for disposal. As you requested, below is UI's plan for manhole waste disposal that addresses the concerns raised in your letter.

1. Routine and emergency electrical repair work that must use manholes as access routes is done by UI's Underground Department. As such, any sludge present in the hole would be scooped out by the crew upon arrival, and placed in a 55-gallon steel ring-top drum. This sludge would then be transported back to the central accumulation area to await sampling and analysis by UI's state certified Environmental Laboratory. This procedure would not be used for emergency situations involving the release of oil from electrical equipment. In those cases, or when the crew observes any oil sheen in the manhole, a licensed clean-up contractor would be used to remediate the situation at the manhole site. The procedure involving the contractor would also be used if UI knew or suspected hazardous material to be present.
2. The central accumulation area that UI proposes to use is its Western Service Center located at 801 Bridgeport Avenue, Shelton, CT 06484. UI is hereby requesting an EPA ID Number for this site as large quantity generator status. Once chemical analysis is completed, the manhole sludge would be classified as either non-hazardous or RCRA hazardous depending on the analytical results.

For material determined to be hazardous, UI would immediately manage the material in accordance with applicable hazardous waste regulations. These manholes generally do not contain any electrical equipment that contains dielectric fluid, however, should there be reason to suspect PCBs in the sludge, analysis will also be done for this parameter. Any material testing positive for PCBs (>1 ppm) would be transferred to UI's Annex III facility at Station B, 510 Grand Avenue, New Haven, CT 06513. This material would subsequently be transported to Rollins Environmental, or a similar contractor, for disposal by incineration.

3. For material that is determined to be non-hazardous, UI would like to have this material classified as Connecticut Special Waste and disposed of as such. We will apply for the Special Waste Permit under separate cover. For material that has tested RCRA hazardous, UI will have the material shipped by a licensed transporter to a properly permitted TSD facility in accordance with all applicable hazardous waste regulations.

I trust this plan meets your requirements. If you have any questions, comments, or need any further information, please feel free to contact me at 499-2563 or Dr. Gregory Kowalczyk at 499-2564.

Sincerely,



Robert Silvestri
Manager, Environmental Operations
& Safety