

COMPASS Audit

PROCESS AND RESULTS



About DYMAX

- Employs
 - + 200 employees
- Headquarters
 - Torrington, CT, USA
- International Facilities
- Founded 1980
- Private Ownership
- Leader of Light Curing Technology
- LEAN Innovations – 6S
- ISO 9001 Certified
- ISO 14001 – Planned 12/2012



PRODUCTS

Adhesives

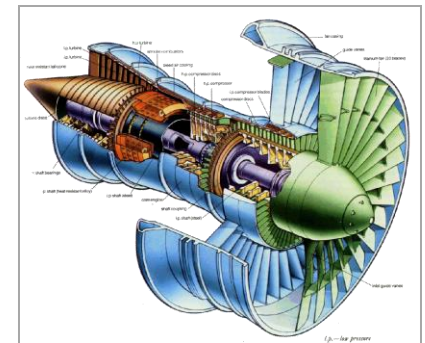
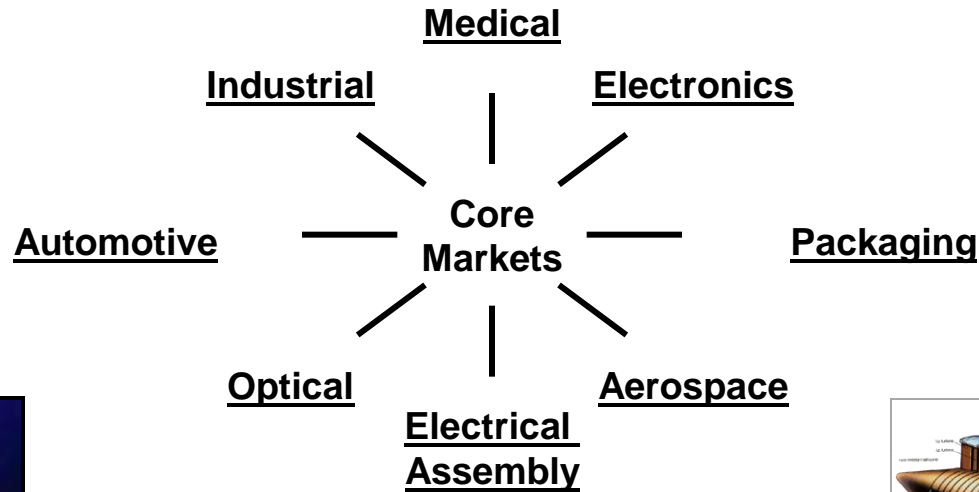
Oligomers & Coatings

Light Curing Systems

Dispensing Systems

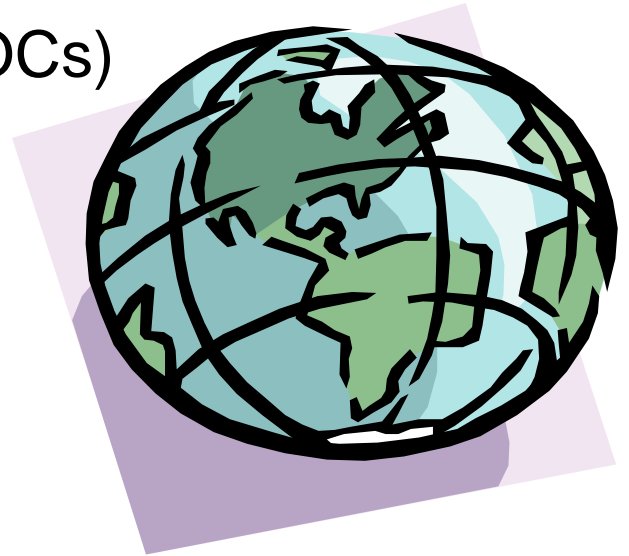


Markets Served



Environmental Benefits of Light Curing Materials (LCM's)

- Solvent-free
- No hazardous air pollutants (HAPs)
- No volatile organic compounds (VOCs)
- No energy costs from curing ovens



Environmental Compliance

- Documented Halogen-Free
- RoHS Compliance
- REACH – No Substances of Very High Concern
- US EPA – No Substances listed in EPA 33/50
- Conflict Minerals Free
- Free of Animal Derived Ingredients
- Natural Rubber Free
- Phthalate Free



EMS / ISO14001 AT DYMAX

- Think system: plan-do-check-act
- Involvement of all staff
- Support from management
- Consider efficiency of energy and raw materials
- Prevention
- Voluntary self compliance



Waste Generated

- Flammable Liquid Waste – D001
- Corrosive Waste – D002
- Used Oil
- Waste Adhesives
- Universal Waste



STORAGE AREAS

- Three Hazardous Waste Storage Areas
- Three Satellite Accumulation Areas
- Status - ?



COMPASS

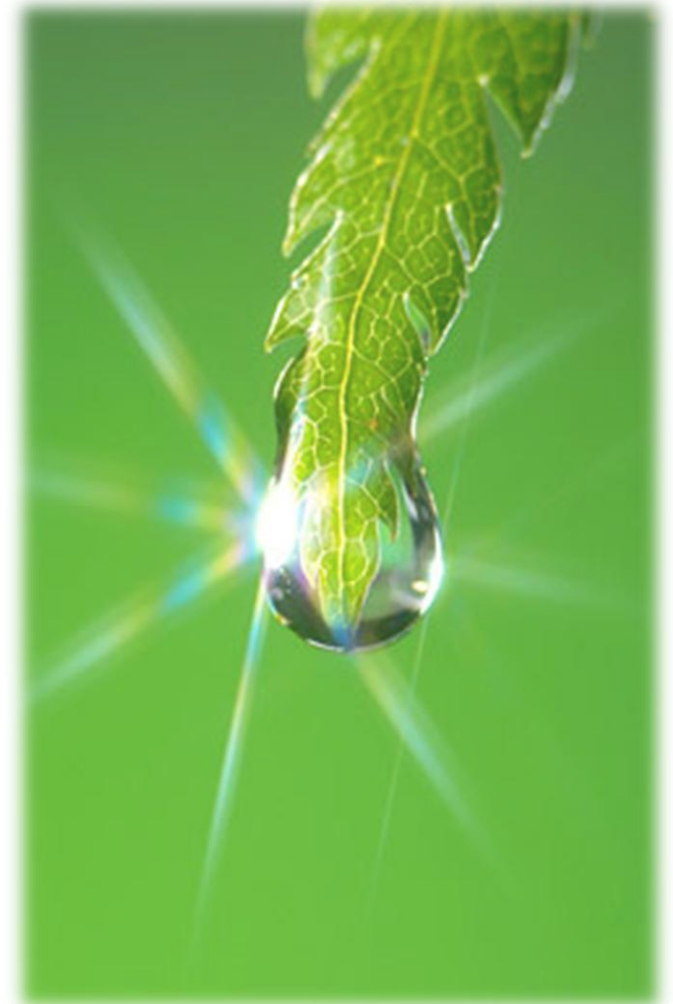
- Program created to assist Connecticut businesses and industries in complying with hazardous waste management regulations
- COMPASS has four main components:
 - A toll-free number (888-424-4193)
 - Compliance Assistance Information
 - ***Consultative Services***
 - On Line Training



CONSULTATIVE SERVICES

“On-site voluntary
compliance audits to
operators of new or
expanding businesses...”

*Perfect For Small
Businesses*



WHAT WAS IN IT FOR DYMAX?

- Improved company credibility
- Competitive advantage in the market place
- Satisfy stakeholders interest
- Validation of Process
- Customer compliance
- Greater Profitability



DYMAX EXPECTATIONS FOR COMPASS AUDIT

- Identify Areas for Opportunity from an auditors perspective
- Obtain suggestions for improvement of our Hazardous Waste Management System
- Ensure Regulatory Compliance
- Free advice
- Establish baseline for continuous improvement



PROCESS

- Review Hazardous Waste Management System
- Contact DEEP to set up Audit
- Have documents easily accessible during audit
- Audit
- Compliance Results



AUDIT

- OPENING CONFERENCE
 - Introductions
 - Company Overview
 - Discussion of Waste Generated
- FACILITY WALK THRU
- CLOSING CONFERENCE
 - Document Review



OPENING CONFERENCE

- DEEP Auditor: **MR. MARK JEPSEN**
- Dymax Employees Present
 - Director of Operations
 - EHS Staff
 - Facility Manager
 - Hazardous Waste Staff
- Discussion of Responsibilities and What to expect
 - Friendly, Encouraging, Understanding, Attentive
 - Timeline

FACILITY WALK THRU

- Tour of each department
 - Provided Open Access
 - Looked in garbage cabinets
 - Regulatory Questions
 - Employees answered process questions
 - Employees answered waste disposal questions
- Provided Practical Advice

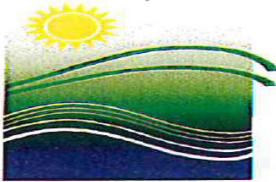


CLOSING CONFERENCE

- Review of Documents
 - * Contingency Plan
 - Reviewed Manifests/LDR's/Waste Determination
 - Biennial Hazardous Waste Report
 - Inspection Logs
 - * Training Documents
 - * Job Descriptions
- Areas for Opportunity Reviewed / Findings
- Clarifications following week via email
- Formal Letter 30 days later

FORMAL REPORT

- Site Information
 - Site description, generator status, activity
- Waste Profile
 - Types, waste profile, determination,
- Shipping Documents
- Reports
- Preparedness & Prevention
- Hazardous Waste Storage Areas
- Inspections & Log
- Waste Minimization Efforts



Connecticut Department of
ENERGY & ENVIRONMENTAL PROTECTION
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division

RCRA (HAZARDOUS WASTE) INSPECTION REPORT
LARGE QUANTITY GENERATOR

Name(s) of inspector(s): M. Jepsen
Date(s) of inspection: April 13, 2012
Inspection Type: Compliance assistance visit ("CAV")
Previous RCRA inspection: None Active RCRA enforcement: N/A

SITE INFORMATION

EPA ID Number: CTR000506477
Site Name: Dymax Corporation
Street Address: 318 Industrial Lane, Torrington, CT 06790
Mailing Address: Same
Contact Name(s) and Title: Susan Thompson – Environmental, Health, and Safety Manager, Stan Plancho – Facility Maintenance Manager, and Sean Wright – Safety Specialist
Contact Phone #: (860) 482-1010 Date established at present location: 2006
Property owned/leased: Dymax Corporation is 50% owner of the property and leases the other 50%.
Previous occupants of site: N/E

STATUS (actual – operating)

CESQG (<100kg/mo) Large Quantity Handler Universal Waste Recycle/Reclaim
 SQG (100 – 1000kg/mo) Small Quantity Handler Universal Waste Burner/Blender
 Large Quantity Generator (>1000kg/mo) Transporter
 Episodic Generator
 Receiving waste from off-site:
 Other:

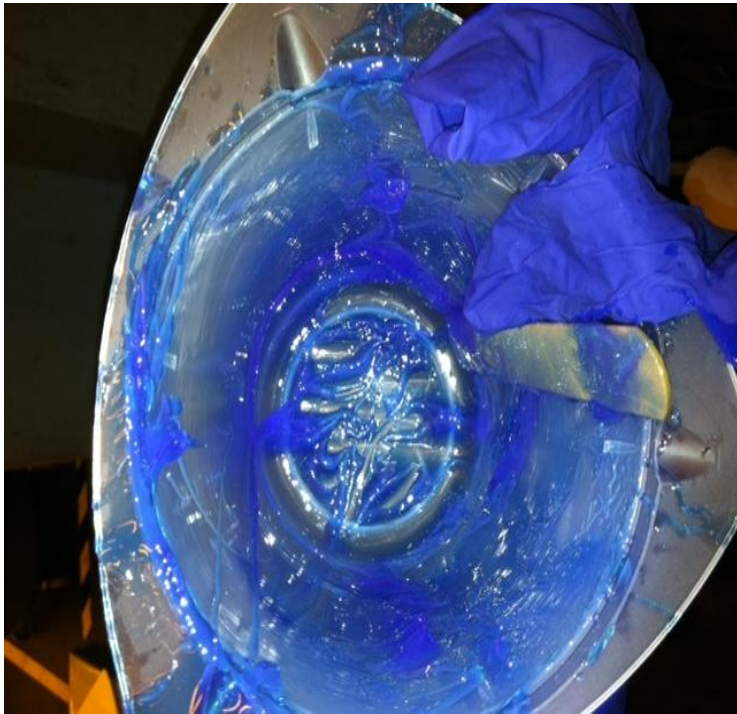
NOTIFICATION

Notification as:
Hazardous Waste: Small quantity generator of RCRA hazardous waste.
Universal Waste (if applicable): N/A, small quantity handler of universal waste.
Any discrepancies between notification & actual operations: Yes (comments below) No
If yes, has a status change been requested: Yes No

5 FINDINGS

- Hazardous Waste Determination for containers found in trash
- Open container
- Lack of dedicated secondary containment for flammable & Corrosive Waste
- Lack of documentation for RCRA hazardous Waste training
- Certain Job Descriptions lack RCRA-hazardous waste responsibilities

1. Hazardous Waste Determination



**MSDS
PROVIDED**
Waste ID as non
hazardous

2. Open Container



- a. Installed ball valve device
- b. provided signage
- c. trained employees

3. Lack of dedicated Secondary Containment





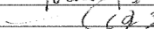





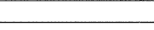
4. Lack of Training Documentation

DYMAX CORPORATION EMPLOYEE TRAINING RECORD

1) Quality Management System Documentation:
Document Issue Date: _____ Document#: _____ Document Revision Level: _____
Title: _____
Or
2) Other Training:
Title: RCRA, RCRA "Empty", Review Hazardous Waste Generated at Dymax and Dymax Hazardous and Non-Hazardous Waste Policy/Procedure
Reason for training: Compliance

318			
<input type="checkbox"/> Process and Filling	<input type="checkbox"/> Supply Chain	<input type="checkbox"/> Customer Support	<input type="checkbox"/> Chemical Operators
<input checked="" type="checkbox"/> R & D	<input type="checkbox"/> Quality (Adhesives)	<input type="checkbox"/> Quality (Equipment)	<input type="checkbox"/> Inv. Control
<input type="checkbox"/> A/E	<input type="checkbox"/> Marketing	<input type="checkbox"/> Sales	<input type="checkbox"/> HR
<input type="checkbox"/> Equipment Manufacturing	<input type="checkbox"/> Shipping/Receiving/ Material Handling	<input type="checkbox"/> Equipment Engineering	<input type="checkbox"/> Maintenance
<input type="checkbox"/> Other			
51			
<input type="checkbox"/> Quality	<input type="checkbox"/> Technical Department	<input type="checkbox"/> Production	<input type="checkbox"/> Other

Training Conducted By Print Name: Susan R. Thompson Sign Name: _____ Date of Training: 4-19-12

Print Name	Signature	Dept
Patrick Vaughn		R&D
Ryan Gentile		R&D
Maria Audia		R&D
Suxin Wang		R+D
Mike Morin		R+D
Michael Wilson		R+D
Aysegul Kascatan		K&D
Nebioglu		R&D
Shuhua Jin		R&D

5. Job Descriptions

POSITION DESCRIPTION

Job Title:	Environmental Health and Safety Manager
Department:	Environmental Health and Safety
Reports to:	Director of Operations, Regulatory Compliance, Quality
Position Summary:	

This position is responsible for creating, maintaining and overseeing this facility's safety, health and environmental programs in compliance with EPA/DEP and OSHA regulations. This person will also be responsible for achieving and maintaining ISO 14001 conformance. This position will also focus on identifying hazardous conditions and practices that exist in the workplace. They will assist in identifying potential hazards in systems, equipment, products, facilities, or processes planned for use in the future. This person is responsible for establishing guidelines needed for maintaining compliance to EPA/DEP and OSHA regulations deemed necessary for Dymax.

Primary Responsibilities:

1. Ensures compliance with local, state and federal environmental laws and regulations (Hazardous Waste Management, Title V, Tier II, TRI, Stormwater, etc.)
2. Ensures compliance with local, state and federal safety & health laws and regulations (Hazwoper, Respiratory Protection, Emergency Evacuation, HazComm, etc.)
3. Achieve and maintain ISO 14001 conformance.
4. Creates health, safety and environmental policies and programs applicable to Dymax and trains employees on them.
5. Assist in identifying and correcting current or future environmental, occupational health and safety hazards.

DYMAX RESULTS OF COMPASS AUDIT

- Identify Areas for Opportunity from an auditors perspective
 - Five findings
 - Offered creative solutions
- Obtain suggestions for improvement of our Hazardous Waste Management System
 - Spill kit sealed with zip tie
 - Manifest....."On Behalf of....."
- Ensure Regulatory Compliance
 - Thorough
 - Professional



CONTACT INFORMATION

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