

Hoya Vision Care Inc.  
580 Nutmeg Road North  
South Windsor, CT  
06074



# Summary of DEP Compliance Assistance Audit

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# Free Regulatory and Technical Expertise



- Purpose: receive assistance from DEP without enforcement action or fines levied
- Scheduled visit performed by DEP inspection staff with Hoya personnel
- Friendly, comprehensive DEP services including technical assistance / pollution prevention
- Hoya requested audit of its South Windsor facility - a “RCRA non-notifier” currently

# What Happened During the Audit?



- Opening Meeting
- On-site walkthrough / tour of the facility
  - ✓ Review of all site operations and manufacturing processes
  - ✓ Evaluation of wastes generated by process and management technique
- Evaluation of On-site Documentation
  - ✓ Shipping Records (e.g., manifests)
  - ✓ Documentation of HW Determinations
  - ✓ Waste profiles (e.g., types and quantities of waste generated)
- Closing Meeting
  - ✓ DEP summarized audit results
  - ✓ DEP discussed SQG -vs- LQG requirements with added wastestreams pending installation of new processes / equipment
  - ✓ Hoya received CESQG guidance and other outreach materials

# What were the Results/ Outcomes?



- Saved Hoya from hiring consultant at \$90/ hr.
- DEP provided comprehensive audit report
- Hoya conducted HW Determinations as recommended by DEP
- Results of analyses yielded non-hazardous waste for all wastestreams
- Hoya's RCRA generator status remains unchanged for now— as a RCRA “non-notifier” or “CESQG”
- Movement of operations from Bethel to South Windsor expected to affect waste generation / status

# Hoya-specific Compliance Objectives



- Document annual HW Determinations for new and existing wastestreams
- Establish “Environment Subcommittee” with key personnel to evaluate materials usage, maximize reuse of materials and minimize waste generation
- Maintain compliance with closure of Bethel facility and successful consolidation in South Windsor
- Stay informed by becoming member of DEP’s Hazardous Waste Advisory Committee Listserv  
[[www.ct.gov/DEP/HWAC](http://www.ct.gov/DEP/HWAC)]
- Contact DEP - go to DEP’s web site [[www.ct.gov/DEP](http://www.ct.gov/DEP)] or contact them via toll free hotline [888-424-4193]

# Questions/Comments

