Connecticut Department of
ENERGY & ENVIRONMENTAL PROTECTION
BUREAU OF MATERIALS MANAGEMENT AND COMPLIANCE ASSURANCE
WASTE ENGINEERING AND ENFORCEMENT DIVISION

RCRA (HAZARDOUS WASTE) INSPECTION REPORT TREATMENT/STORAGE/DISPOSAL FACILITY

Name(s) of Inspector(s): P. Hassler

Date(s) of Inspection: September 3, 4, 11, 15 & 17, 2014 Complaint Number: N/A

Previous RCRA inspection: June 27 & 28, July 2 & 3, 2012 Active RCRA enforcement: NA

SITE INFORMATION

EPA ID Number: CTD000604488

Site Name: Clean Harbors of Connecticut, Inc.

Street Address: 51 Broderick Street, Bristol, CT

Mailing Address: 761 Middle Street, Bristol, CT, 06010

Contact Name(s) and Title: Eric Congdon, Facility General Manager; James Childress, VP Corporate Env. Compliance (September 11th only); Evan Upright, Lab Supervisor (September 3 & 11 only).

Contact Phone Number: (office) 860-583-8917, ext. 321; (cell) 860-209-5463 Date established at present location: 1992

Property owned/leased: Owned Previous occupants of site: Connecticut Treatment Corporation

STATUS (actual-operating)

___ CESQG
___ SQG
X Lg. Quantity Generator
X Transporter
___ Recycle/Reclaim
___ Used Oil Processor/Re-Refiner
X Universal Waste Destination Facility

X Storage
X Treatment
___ Disposal
___ Post Closure Units

___ Interim Status
X Permitted Facility
X CT Regulated Facility
X Commercial Facility
___ Small Quantity Universal Waste Handler
X Large Quantity Universal Waste Handler

_X_ Other: **Truck-to-truck transfer facility; universal waste (electronics) and solid waste (non-universal waste electronics) dismantling facility. NOTE: Although permitted to dismantle used electronics, Clean Harbors does not currently perform this activity on site.**

Notified as: **Hazardous waste generator and treatment/storage facility; universal waste large quantity handler; truck-to-truck transfer facility. On September 30, 2013, the Department renewed Clean Harbors' RCRA Part B Permit (DEP/HWM 017-002) for these activities.**

Any discrepancies between notification/Part A/B & actual operations: _X_ Yes __ No: _____

If yes, has a status change been requested: ___ Yes ___ No: **Compliance Schedule Section 5(2) of the Part B Permit required Clean Harbors to submit a revised Part A application to reflect the appropriate waste codes and process units. To date, a revised Part A application has not been submitted. NOTE: On November 14, 2013, Clean Harbors filed a "Petition for Administrative Appeal" challenging that certain terms and conditions of the permit will detrimentally impact the facility. The permit conditions being challenged involve maximum storage and processing capacities, acceptable RCRA waste codes, acceptable storage time frames (e.g., truck-to-truck transfer area), and the inspection procedure for the trailer storage area. Negotiations regarding the appeal remain on-going.**

TYPES OF WASTE HANDLED

_X_ Ignitables (D001)	_X_ F or K listed wastes	_X_ Used Oil
_X_ Corrosives (D002)	_X_ P or U listed wastes	_X_ CT Regulated Waste
_X_ Reactive (D003)	___ Precious Metals	___ Haz. Scrap Metal
_X_ TCLP (D004 – 43)		

_X_ Universal Waste (list type): **Spent mercury-containing lamps, spent mercury-containing items, spent batteries, and used electronics.**

_X_ Other: **PCB-containing wastes, biomedical waste and asbestos waste.**

Comments: **Clean Harbors is prohibited from accepting many RCRA waste codes, as identified in Section II of their Part B Permit.**

HANDLING METHODS

_X_ Containers	___ Containment Building	___ Waste Piles
_X_ Aboveground Tanks	_X_ Wastewater Treatment	___ Landfill
___ Underground Tanks	___ Incinerator/Thermal Treatment	___ Drip Pad
___ Surface Impoundment	_X_ Chemical, Physical, Biological Treatment (**Stabilization and solidification**)	

___ Other: _____

SITE DESCRIPTION

Proximity to residential areas/surface water/recharge zone, etc: **The facility is located in an industrial park surrounded by commercial, residential and industrial properties. Grannis Brook, a tributary to Eight-Mile Brook, borders the southeastern corner of the property.**

Water supply (if wells, give approximate locations): **City water.**

Types of waste/water discharges: **Sanitary sewer for all sanitary wastewater and treated effluent. Storm sewer to Grannis Brook for yard drains. All discharges are under various permits issued by the Department.**

Evidence of on-site disposal: **?** Yes ___ No (if yes, give specifics): **None evident during inspection. However, low levels of groundwater contamination have been detected according to a September 11, 2008 Phase II Environmental Site Assessment Report, prepared by ERM Consultants. The contaminants included ETPH, PCBs, pesticides and zinc, although ERM concluded that the levels were such that remediation was not required. The Corrective Action component of the Part B Permit requires Clean Harbors to further investigate environmental conditions in accordance with a Partial Work Plan approved by the Department on July 2, 2014. For more information, see Sandy Brunelli of the Department's Remediation Division.**

Groundwater monitoring wells on-site: **X** Yes ___ No. Groundwater classification: **GB**

If yes: (briefly describe why installed and any information available): **Ten groundwater monitoring wells (and 34 soil borings) were installed in July 2008 as part of the above-noted Phase II Environmental Site Assessment. The wells were monitored once for this investigation. Since 2008, no additional wells or soil borings have been installed, and no additional sampling of existing wells has been performed.**

Comments: _____

SITE ACTIVITY

Number of employees/shifts: 15 on two shifts. Type of activities: Commercial waste treatment, storage and transfer facility.

Products: None. Clean Harbors is a commercial facility that treats hazardous and non-hazardous wastes and/or transfers wastes to other vehicles for shipment to other processing or disposal facilities.

Describe processes (particularly those that involve chemical and generate waste): Clean Harbors also occupies the building at 761 Middle Street, Bristol, which is an adjoining parcel (separated by a chain-link fence) that is not covered by the RCRA Part B Permit. The building at 761 Middle Street employs ~65 people and houses administrative offices and equipment storage for their lab-packing division. In ~November 2013, the transportation and emergency response division, called Clean Harbors Environmental Services, Inc., relocated from Middle Street, Bristol to 770 Derby Avenue, Seymour.

The Part B-permitted facility at 51 Broderick Road consists of two buildings plus outdoor activities that include a waste stabilization/solidification area, a flammable materials storage area, a truck-to-truck transfer area, and trailer and dumpster storage areas. The two buildings include a drum warehouse and the operations building. The drum warehouse has container storage bays (used electronics disassembling, although no longer performed, remains a permitted activity for this building). The operations building houses waste container and tank storage areas, the truck-to-truck transfer platform (covered loading dock), the waste storage and treatment tanks, the quality assurance laboratory, and support offices. The outdoor waste-stabilization/solidification operation and flammable materials storage area are located under a roof along the west wall of the operations building. Clean Harbors receives 5 to 10 manifested loads of waste per day (bulk and container) from off-site generators. All wastes are received at the operations building and managed as follows:

A) CONTAINER STORAGE: Containers are stored in the drum warehouse, the operations building, and the solidification/stabilization area. Thirteen bays have been permitted for container storage of RCRA hazardous, non-RCRA hazardous, universal and PCB-containing wastes, with a permitted maximum storage capacity of 68,200 gallons and 82-cubic yards. In addition, containers are temporarily stored at the loading/unloading area, with a permitted maximum capacity of 18,260 gallons (including tankers), and at three staging areas, with a permitted maximum capacity of 20,570 gallons. In the drum warehouse, the storage bays are identified as Bays A, B, D, E, F, G and J. In the operations building, the storage bays are identified as Bays H, K, L, M1 and M2. Of these, Bay H is the staging area for transfer to treatment tanks or to outbound trucks, and Bays M1 & M2 are the loading/unloading areas where inbound containers are sampled prior to being placed in storage or treatment areas. Container storage Bay C, with a permitted maximum storage capacity of 2310 gallons, is located outdoors along the west wall of this building, under the roof of the tanker loading/unloading bay (a/k/a "spill control area"). The roll-off dumpster storage area is located at the waste solidification/stabilization pad. The permitted uses and capacities of each bay are as follows:

Bay A: storage of acid-reactive wastes; capacity of 5,500 gallons.

Bay B: rows 1 – 7 are for storage of alkaline wastes and other compatible wastes (i.e., used oil, non-RCR hazardous coolants, non-RCRA hazardous solids, RCRA hazardous solids, combustible liquids, etc.) and rows 8 – 10 are for universal and solid wastes; capacity of 18,480 gallons and 42 cubic yards. NOTE: By the term "alkaline," Clean Harbors means any waste that does not clearly fit in one of the other categories of the wastes managed at the facility (acidic, oxidizer, ignitable, etc.) and is not incompatible with alkaline material. As a result, a variety of wastes are stored in rows 1 – 7 of this bay. During this inspection, the majority of containers stored here were cubic-yard boxes of "Paint Care" materials.

Bay C: storage of flammable (ignitable) wastes; capacity of 2,310 gallons.

Bay D: storage of toxic and PCB-containing wastes; capacity of 2,640 gallons.

Bay E: storage of toxic and PCB-containing wastes; capacity of 6,600 gallons; currently used for virgin chemicals (e.g., sodium hydroxide)

Bay F: storage of toxic wastes; capacity of 2,750 gallons; currently used for the storage of virgin materials.

Bay G: storage of acidic wastes; capacity of 2,970 gallons; currently used for the storage of used ferric chloride received on bills of lading as reusable pH-adjustment chemical (not waste) for the wastewater treatment system.

Bay H: all types of hazardous and non-hazardous wastes can be staged here for up to five calendar days while awaiting transfer to on-site storage or treatment units or to trucks for off-site shipment. Lab-packs can also be disassembled here. Bay H is a large U-shaped area that wraps around Bays M1 and M2 and the concrete vault housing the waste treatment and storage tanks. It has a capacity of 8,800 gallons.

Bay J: dismantling of universal wastes and non-hazardous solids; capacity of 40-cubic yards.

Bay K: storage of acidic wastes; capacity of 5,390 gallons;

Bay L: storage of non-acidic toxic or PCB-containing wastes; capacity of 990 gallons. During this inspection, only raw materials (oxidizers) were being stored here.

Bay M1: inbound acidic/toxic wastes can be staged here for up to five calendar days while awaiting sampling, analysis and transfer to storage areas or treatment units; capacity of 4,950 gallons. During this inspection, only cubic-yard boxes of "Paint Care" materials and totes of reusable ferric chloride (used for pH-adjustment in the wastewater treatment system) were being stored here.

Bay M2: inbound alkaline/toxic wastes can be staged here for up to five calendar days while awaiting sampling, analysis and transfer to storage areas or treatment units; capacity of 6,820 gallons. During this inspection, only cubic-yard boxes of "Paint Care" materials were being stored here.

B) TANK STORAGE: Two tanks are permitted to store waste, identified as Tank T-11 (4,116 gallons) and Tank T-14 (10,836 gallons). Tank T-14 is permitted to receive RCRA hazardous and non-hazardous wastes and Tank T-11 is permitted to receive only non-RCRA hazardous wastes (i.e., CR02, CR03, and CR04). Both tanks are aboveground and located in the operations building. These tanks can also feed waste to the wastewater treatment system. Mr. Congdon stated that despite being permitted for hazardous waste, for the past few years Tank T-14 has received only non-hazardous wastes. Ten other tanks located in the operations building are associated with the wastewater

treatment system (described below) and are not permitted as hazardous waste units. All storage and treatment tanks are located in a four-foot deep, epoxy-coated, recessed concrete vault. Tank trailers are off-loaded to the tanks through screen filters and any of four inlet pipes located along the west wall of the operations building, in the tanker loading/unloading area ("spill control area"). Each inlet pipe has its own pump and manifold system. Three of the manifolds pipe waste to wastewater treatment tanks T-4 through T-7. The other manifold pipes waste to tanks T-2, T-10, T-11, T-12 or T-14. Two additional pumps, located in the operations building, are for transferring wastes from containers to the treatment tanks. This is primarily done from the southwest portion of Bay H.

C) HAZARDOUS WASTE SOLIDIFICATION/STABILIZATION: Clean Harbors is permitted to perform solidification/stabilization on RCRA hazardous and non-hazardous waste at a maximum through-put rate of 360 cubic yards per day. These activities are conducted in a steel tub having a capacity of 28.8 cubic yards. The tub is located outdoors, adjacent to the tanker truck loading & unloading area, on an epoxy-coated concrete base with a coated concrete berm. In the tubs, backhoes and shovels are used to mix RCRA hazardous semi-solids with drying and/or stabilizing agents such as ferrous sulfate, lime, kiln dust, Portland cement, fly ash, "diaper dust" (absorbent polymer) or paper pulp. The purpose is to solidify the waste (eliminate free-draining liquid) and/or to stabilize it so that the concentrations of leachable metals do not exceed the maximum allowable contaminant concentrations for the RCRA toxicity characteristic or the land disposal requirements. Solidified and/or stabilized sludge is stored in roll-off dumpsters on an epoxy-coated concrete pad immediately next to the tub. This area is permitted to hold up to 360 cubic yards of stabilized/solidified waste in nine, 40-cubic yard roll-off dumpsters or a combination of dumpsters and self-contained vessels (if free-draining liquids are present). Once processed, every load of solidified/stabilized waste is tested to ensure that the treatment was complete.

D) UNIVERSAL and SOLID WASTE DISMANTLING: Clean Harbors is permitted to store and/or process universal waste and non-universal solid waste (i.e., electronic equipment not defined as universal waste and other equipment such as centrifuges, de-humidifiers, laboratory refrigerators and freezers) in Bay B and Bay J of the container storage building. However, Mr. Congdon stated that Clean Harbors no longer performs this activity, despite remaining permitted to do so. In addition, Clean Harbors eliminated the Freon recovery unit that had been located in Bay J. During this inspection, no used electronics or Freon-containing items were located in the container storage building.

E) WASTEWATER TREATMENT SYSTEM: In the operations building, Clean Harbors performs batch treatment of hazardous and non-hazardous waste received from off site. Clean Harbors is permitted to discharge 65,000 gallons per day (monthly average) of treated wastewater from this system, with a maximum of 100,000 gallons per day. Wastes are pumped to the storage and treatment tanks via the four manifold systems described under "Tank Storage," above. Hard piping and portable hoses are used to transfer the wastes. Because valves, pumps and couplings sometimes leak waste, pans and trays are used to collect this material which is put back into the system for treatment (no leaks were observed during this inspection). Treatment is performed in four tanks, designated T-4 through T-7 (each 7,500 gallons), each of which is also a reactor. Tanks T-4 through T-7 were installed in September

2004, replacing tanks T-19, T-26 and T-27. Waste alkaline liquids and/or partially treated batches are sometimes (depending upon treatment tank availability) collected in tanks T-10 (4,116 gallons) and T-12 (10,836 gallons). Waste treatment batches are first "put together" in any of tanks T-4 through T-7, with the wastes comprising the batch transferred to the treatment tanks from containers, tanker trucks, and/or tanks T-10, T-11, T-12 or T-14. The on-site quality assurance laboratory determines a) which wastes are to be co-mingled to comprise a treatment batch, and b) how the treatments are to be performed (see "Quality Assurance Laboratory" below). Types of treatment performed include: .

- Neutralization of acidic and alkaline wastes using waste and virgin chemicals to perform the neutralization. .
- Organics oxidation: phenol-bearing wastes are treated at an elevated pH using hydrogen peroxide, sodium hypochlorite and/or potassium permanganate. Activated carbon is added to adsorb organic constituents. Calcium chloride is used to break chelated compounds. The contacts stated that although Clean Harbors has the capacity to perform organics oxidation, this treatment is rarely performed. .
- Chromium reduction: sodium metabisulfite is used in the treatment of chromium-bearing wastes, followed by traditional metals precipitation (addition of coagulants and/or flocculants) and solids separation. .
- Cyanide destruction: two-stage treatment is performed, using sodium hypochlorite and including pH adjustment. The contacts stated that although Clean Harbors has the capacity to perform cyanide destruction, this treatment is rarely performed. .

Following treatment in tanks T-4 through T-7, waste batches are passed through either of two plate-and-frame filter presses to remove solids (no coagulants or flocculants are added prior to the presses). Sludge off the filter presses is collected in 2.5-cubic yard hoppers for transfer to roll-off dumpsters for off-site disposal. In June 2008, Clean Harbors reclassified this sludge as non-hazardous (they had previously managed it as hazardous waste). Filtrate off the filter presses is transferred to tank T-3B (35,000 gallons) which feeds it to tank T-2 (30,000 gallons) for final treatment. Final treatment consists of organics oxidation using hydrogen peroxide, and metals precipitation using lime, ferric chloride and sometimes flocculants. Periodically, solids are removed from the bottom of tank T-2 and processed in the solidification/stabilization tub or collected in a vacuum pump truck for off-site disposal. From tank T-2, wastewater is passed through an activated carbon adsorption unit en route to one of four, 35,000-gallon, open concrete basins located indoors. Final effluent samples are collected and analyzed from each basin prior to discharging the treated wastewater to the sanitary sewer. Holding tanks T-1, T-15, and T-28 are used to store water, bleach and caustic soda for use in the wastewater treatment system. A number of totes and tanks containing wastewater treatment reagents are also stored in the operations building. .

F) TRUCK-TO-TRUCK TRANSFER: Some containerized wastes destined for other Clean Harbors facilities are consolidated onto trucks at this facility's truck-to-truck transfer area. The truck-to-truck transfer area consists of five truck bays and a covered (pavilion-style) loading dock, with a permitted maximum capacity of 5060 gallons per bay (totaling 23, 300 gallons). Trucks and the containers being transferred can be kept at the truck-to-truck transfer

area for up to three days while a full load is being accumulated. The containers are not opened, sampled or treated on site. The ultimate destination facility, not the Bristol facility, is listed on the inbound manifest. While loads are being accumulated, the trailers are inspected daily for signs of leakage and time in storage (to ensure that the trailer has not been on site for more than 10 days). When the load is complete, the manifests and the transfer tickets are re-checked for accuracy and the load is shipped to the destination facility. Truck-to-truck transfer is also performed on biomedical waste.

G) TRUCK PARKING AREAS: Trucks loaded with waste can be stored for up to 10 days at either of two permitted truck parking areas, designated as Area # 1 and Area # 3 (truck parking area # 2 was never constructed). Truck parking Area # 1 consists of four bermed, epoxy-coated concrete truck bays, with a permitted maximum capacity of 5060 gallons per bay (totaling 20,240 gallons). Truck Parking Area # 3 consists one bermed, epoxy-coated concrete truck bay, with a permitted maximum capacity of 5060 gallons, and is used for the storage of up to two roll-off dumpsters or sealed vacuum boxes.

H) QUALITY ASSURANCE LABORATORY: The laboratory analyzes potential customers' wastes for a variety of parameters, spot tests each load received from off-site to determine if it will be accepted or rejected, performs treatability and compatibility tests on wastes to formulate treatment batches, analyzes samples from various stages of each batch treatment, and analyzes treated effluent from the wastewater treatment system. Some of the primary laboratory equipment includes a gas chromatograph (used for all organics and PCB testing), a gas chromatograph/mass spectrometer, an inductively coupled plasma unit (used for metals testing), flash point testers, chlorine and sulfide test kits, pH probes, and a variety of litmus paper tests (e.g., cyanide, sulfide, oxidation potential). Each inbound load of waste is sampled and analyzed for pH, water solubility, flash point, cyanide, sulfide, oxidation potential, chemical compatibility and radioactivity (refered to as the "Great Eight" parameters). Inbound liquid wastes are also frequently tested for metals. To determine treatability and compatibility with other wastes, representative samples of the waste treatment batch and the candidate waste to be added to the batch are mixed together, held for three hours and observed to determine if any reaction occurs. Waste shipment cannot be accepted into the facility or treated without laboratory approval. Analytical results are recorded on Quality Control Sheets (also referred to as "laboratory forms") or Bulk Receiving Reports (for bulk loads). All waste movements, whether to storage areas or treatment batches, must first be approved by the laboratory via Transfer Tickets. Two sinks are located in the laboratory, each of which discharges directly to the sanitary sewer. Three laboratory hoods ventilate directly to the atmosphere. During this inspection, the lab had the following six satellite accumulation containers:

- 55-gallon drum of non-hazardous "lab trash" (e.g., pipettes, wipes, gloves, rinsed sample jars)
- 5-gallon can of hazardous waste solids containing liquids (vials containing trace amounts of metals, etc.)
- 5-gallon can of hazardous waste nitric acid rinse (ICP prep.), stored under a lab hood
- 5-gallon can of hazardous waste flammable liquid (sample pour-offs), stored under a lab hood

- 2 ½-gallon can of hazardous waste left over samples (RCRA-listed), stored under a lab hood. This waste gets processed through the wastewater treatment system
- 2 ½-gallon can of hazardous waste left over samples (RCRA-characteristic), stored under a lab hood. This waste gets processed through the wastewater treatment system

I) MISCELLANEOUS:

Parts Washing: One rarely used parts washer is located in the operations building, used for cleaning pumps and other equipment. It uses a non-hazardous aqueous cleaning solution. One hazardous waste satellite accumulation drum, located next to the parts washer, is used to collect contaminated personal protective equipment and absorbents.

Empty Drums: Clean Harbors has two stations for rinsing empty drums, both of which are located at the off-loading manifolds. The rinseate is pumped to the same treatment tank that had received the drum's original contents. Metal drums are placed on a trailer for transport to local scrap metal dealers. Plastic drums are put onto a different trailer for transport to plastic recyclers. Plastic totes are triple rinsed and stored outdoors for reuse next to the drum warehouse.

Lab Packing: Lab packs, received infrequently, may be disassembled in container storage Bay H and on a platform over tank T-4 in the operations building. However, Mr. Congdon stated that Clean Harbors no longer assembles or disassembles lab packs.

Air Pollution Control: One wet scrubber, equipped with a packed column of plastic balls and caustic solution to neutralize acidic vapors, receives exhaust from waste treatment tanks T-2 and T-4 through T-7, the lab pack disassembly platform, and the two empty drum rinsing stations. When necessary, the facility also uses flexible hoses connected to blowers to ventilate areas through the scrubber. Also, since the September 2005 RCRA inspection, Clean Harbors has installed 18 gas detectors at various locations throughout the operations building, including above the waste treatment tanks and at the loading/unloading areas and chemical feed systems. The detectors detect cyanide, nitrogen oxide, chlorine and sulfide gasses. There are no gas detectors above waste tanks T-11 and T-14.

WASTE PROFILE

The Waste Profile consists of two tables, one for in-bound wastes received from off site and the other for out-bound wastes shipped out. Both tables were compiled from Clean Harbors' records for the period between January 1 and August 31, 2014. For the sake of brevity, on the in-bound wastes table several similar waste types (and their corresponding RCRA or CT-regulated waste codes) were combined. The outbound table (attached) remains as presented by Clean Harbors.

Wastes generated on site, including the mix pit solids and the metal hydroxide sludge from the wastewater treatment system, are tracked through the computerized Waste Information Network System ("WINS"). Each load from the mix pit can be traced back to the original off-site generator. In addition, each container handled in the truck-to-truck transfer operation is assigned a bar code tag and tracked through WINS. The system can tell how many containers are on site at any given time, the weight of each container, the truck it ends up on and the corresponding manifest for the shipment. According to WINS, between January 1 and August 31, 2014, Clean Harbors truck-to-truck transferred 17,560 drums.

INBOUND WASTE

(Jan. 1 – August 31, 2014)

WASTE STREAM	WASTE CODES	QUANTITY	HANDLING METHOD	TRANSPORTER
Haz. waste liq. (low btu organic liquids)	D007, D039, D040, D043, F001, F002, F003, F005	~1312 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste liq. (immersion cleaner)	D006, D008, D018, D027, D039, D040	117 gal.	containers	Clean Harbors Environmental Services, Inc.; various others
Waste flam. liq. (low btu organic liquids)	D001, D018	150 gal.	containers	Clean Harbors Environmental Services, Inc.; various others
Waste flam. liq. (solvent blend)	D001, D018, D035, D039, F003, F005	1648 gal. plus 1085 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Waste corrosive liq. (conc. acids)	D002, D006 - 8	144,065 gal. plus 34,470 lbs.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste corrosive liq. (conc. bases)	D002	172,232 gal.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste chrome-bearing solutions	D001, D002, D007, F019	5300 gal. plus 39,758 lbs.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste chrome sol. from electroplating (not treated on site)	D002, D006 – 8, D010	11,436 lbs. plus 220 gal.	containers	Clean Harbors Environmental Services, Inc.; various others

Waste hydrofluoric acid	D002	720 gal.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste hydrofluoric from electroplating (not treated on site)	D002	9492 lbs.	containers	Waste hydrofluoric from electroplating (not treated on site)
Waste hydrofluoric & nitric mixture	D002, D006 – 8, D010, D011	27,850 gal. plus 3358 lbs.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste nitric acid	D002, D006 - 8	10,784 gal.	tankers	Clean Harbors Environmental Services, Inc.; various others
Waste nitric from electroplating (not treated on site)	D001, D002, D007	4985 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste liq. (acid wastewater, low metals or heavy treat.)	D002, D006 – 8, D011	189,441 gal. plus 403 lbs.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste liq. (alk. wastewater, low metals or heavy treat.)	D002, D004 - 11, D028, D043, F002, F006	303,427 gal. plus 600 lbs.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste liq. (alk. wastewater from plating – not treated)	D006, D007	2062 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste liq. (CES liquid)	D008	3200 gal.	tankers	Clean Harbors Environmental Services, Inc.; various others
Waste oxidizer solution	D002	10,411 gal.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste cyanide or sulfide sol.	D002, D003, D004 – 8, D011, F007, F009	16,357 gal. plus 11,090 lbs.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Waste cyanide or sulfide (from plating – not treated on site)	D002, D003, D006 – 8, D010, D011, F007	2685 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste solids (contain CN, sulfide)	D003, D006 – 8, F007, F009	14,301 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste solids	D001, D002, D006 – 8, D010, D018, F003, F005, F008	3205 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste solids & semi-solids (for	D006 – 8, D009, D010, D011	900,723 gal. plus 1,014,975	tankers & containers	Clean Harbors Environmental Services, Inc.; various others

stabilization)		lbs.		
Haz. waste solids (RCRA-listed for stabilization)	F006, F019	6550 lbs. plus 765 gal.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste solids (debris for off-site microencapsulation)	D006 - 8	102,235 lbs. plus 115 cu. yds.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste solids (high toxicity 2,4 D)	D016	3860 lbs.	containers	Spent mercury-containing lamps
Haz. waste fuel, solids (debris)	D005, D036, F003, F004	798 lbs.	containers	Spent mercury-containing lamps
Haz. waste (Hg salts & solutions)	D002, D007, D009, D011	690 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste lab packs (for incineration)	D003	1165 lbs.	containers	Spent mercury-containing lamps
Haz. waste solid (crushed Hg lamps)	D009	8 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Haz. waste batteries (Hg for retort)	D009	5 lbs.	containers	Spent mercury-containing lamps
Spent mercury-containing lamps	Universal waste	90 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Spent lead-acid batteries	Universal waste	51 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Paint Care (pre-sorted latex paint)	NA	409,942 lbs.	cu.-yd. containers	Clean Harbors Environmental Services, Inc.; various others
Paint Care (unsorted mixed paints)	NA	1,368,389 lbs.	cu.-yd. containers	Clean Harbors Environmental Services, Inc.; various others
Paint Care (pre-sorted flam. paint to be incinerated)	D001, D004, D005, D007, D008, D010, D011, D035	33,450 lbs.	cu.-yd. containers	Clean Harbors Environmental Services, Inc.; various others
Paint Care (pre-sorted reactive)	D002, D003	3 lbs.	container	Clean Harbors Environmental Services, Inc.; various others
Waste PCBs	CR01	400 lbs.	container	Clean Harbors Environmental Services, Inc.; various others
Used oil	CR02	17,311 gal.	tankers & containers	Clean Harbors Environmental Services, Inc.; various others
Used oil & water	CR02, CR04, CR04	201,858 gal.	containers	Clean Harbors Environmental

		plus 19,626 lbs.		Services, Inc.; various others
Non-haz. acidic wastewater	CR04	173,512 gal.	tankers	Clean Harbors Environmental Services, Inc.; various others
Non-haz. alkaline wastewater	CR04	~2,170,483 gal. plus 67,946 lbs.	tankers	Clean Harbors Environmental Services, Inc.; various others
Non-haz. liq. (aqueous cleaners)	CR04	2279 gal.	containers	Clean Harbors Environmental Services, Inc.; various others
Non-haz. liq. (low btu organics/water)	CR04	1460 lbs. plus 30 gal.	containers	Clean Harbors Environmental Services, Inc.; various others
Non-haz. solids	CR05	~1,161,598 lbs. plus 25,104 cu. yds. plus 106,810 gal.	containers	Clean Harbors Environmental Services, Inc.; various others
Non-haz. semi-solids	CR02 – CR05	~1,200,000 lbs. plus ~370,000 gal. plus 32, 430 cu. yds.	containers	Clean Harbors Environmental Services, Inc.; various others
Oil filters for reclamation	NA	13,675 lbs.	containers	Clean Harbors Environmental Services, Inc.; various others
Caustic or acidic sol. for re-use	NA	27,976 gal.	tankers	Clean Harbors Environmental Services, Inc.; various others

OUTBOUND WASTE

All outbound RCRA hazardous and non-hazardous waste shipments made between January 1 and August 31, 2014 were compiled by Clean Harbors in the attached table. Of the total presented in the table, Clean Harbors exported 423,984.06 pounds of hazardous waste to Clean Harbors Canada, Inc., Corunna, Ontario.

40 CFR 262.11; 262.40(c) **HAZARDOUS WASTE DETERMINATIONS** (GHW) 22a-449(c)-102(a)

Determination conducted for all waste streams: X Yes ___ No (explain): Appeared to be complete. Two examples include metal hydroxide sludge and mix pit solids, both of which are generated on site. The metal hydroxide sludge is tested quarterly and the mix pit solids are tested per batch. Some of the recent analyses (e.g., July 2, 2014 of sludge and July 30, 2014 of mix pit solids), performed by Phoenix Environmental Laboratories, showed the wastes to be non-hazardous. For information regarding inbound wastes and treatability, see the "Waste Analysis" section of this report.

Determination updated annually (documentation on-site): X Yes ___ No: _____

40 CFR 262.20-23; 265.70-77;
40 CFR 273.18, 38 & 39 & 279.56

SHIPPING RECORDS (DMR)

22a-449(c)-102(b)(3); 105(a);
22a 449(c)-113(a)(1) & 119(a)(1)

Date/months of shipping records reviewed: **Spot-checked manifests of inbound loads for April and August 2014 (e.g., there were 96 manifested loads during the last week of August), certain containers currently in storage, and all rejected loads for 2013.**

Manifests used for all hazardous waste shipments: _X_ Yes ___ No (explain): _____

Shipping records used for universal waste: _X_ Yes ___ No (explain): _____

Shipping records used for used oil: _X_ Yes ___ No (explain): _____

Appropriate copy(ies) on-site: _X_ Yes ___ No (explain): _____

Any exception (generators), discrepancy or un-manifested waste reports (facilities): _X_ Yes ___ No: **Various off-specification and/or rejected loads (full and partial) are recorded.**

WASTE MINIMIZATION PROGRAM

Is a program in place: _X_ Yes ___ No (if written program, obtain a copy)

If yes, briefly describe the elements of the program, identify waste types and any reduction achieved: **Clean Harbors has a written waste minimization plan, last revised on June 10, 2013, describing their recycling, pollution prevention and waste minimization efforts.**

If no, did the inspector recommend that the company:

Assess their processes and waste streams for potential reductions in waste quantities: ___ Yes ___ No

Assess their raw materials for less hazardous alternatives: ___ Yes ___ No

Assess their water usage for potential reductions: ___ Yes ___ No

Assess their energy usage for better efficiency: ___ Yes ___ No

Evaluate the potential for closed loop processes: ___ Yes ___ No

40 CFR 268

LAND DISPOSAL RESTRICTIONS (GLB)

22a-449(c)-108

Has the generator determined whether the waste ___ **meets** _X_ **doesn't meet** the treatment standard(s) by _X_ testing the waste _X_ using knowledge of waste: ___ Yes ___ No: _____

If the waste or contaminated soil **does not meet** the treatment standard(s), has the generator sent a one-time written notification (or subsequent notification(s) if the waste changes) to each receiving facility: _X_ Yes ___ No ___ N/A (explain): ___

If the waste or contaminated soil **meets** the treatment standard(s) at the original point of generation, has the generator sent a one time certification (or subsequent notification(s) if the waste changes) to each receiving facility: ___ Yes ___ No (explain): **N/A**

If the generator's waste is subject to a case-by-case extension, no-migration petition, or national capacity variance, has the generator sent a one time written notification (or subsequent certification(s) if the waste changes) to each receiving facility: ___ Yes ___ No _X_ N/A (explain): _____.

If the generator is managing and treating a restricted waste or contaminated soil in tanks, containers, or containment building to meet applicable treatment standards, has the generator sent a one time notification (or subsequent certification(s)) if the waste changes) to each receiving facility: _X_ Yes ___ No __ N/A (explain): _____.

Has the generator retained on-site a copy of all LDR documentation for 3 years: _X_ Yes ___ No

Comments: _____.

If site is a treatment facility, complete and attach, "Attachment N: Land Disposal Restrictions – Treatment Facility Requirements".

40 CFR 265.75 **BIENNIAL HAZARDOUS WASTE REPORT** (DEX) 22a-449(c)-105(a)(2)(M)

Reports filed on a biennial basis: _X_ Yes ___ No. Date received at DEP: **February 28, 2014.**

Comments: _____.

40 CFR 265.17 **IGNITABLES/REACTIVES/INCOMPATIBLES** (DSC) 22a-449(c)-105(a)(1)

Ignitable & reactive wastes separated from sources of ignition or reaction & handled per 265.17: _X_ Yes ___ No

"No Smoking" signs posted in areas of ignitable or reactive hazardous waste: _X_ Yes ___ No

Comments: _____.

40 CFR 262.34(c)(1) **SATELLITE ACCUMULATION** (DMC) 22a-449(c)-102(a)

Approximate number of satellite storage areas: **Six (all located in the QA laboratory).**

Less than 55 gallons (or 1 quart acutely hazardous waste) per waste stream per satellite accumulation area: _X_ Yes ___ No

Containers marked and contents described: _X_ Yes ___ No. Containers closed when not in use: _X_ Yes ___ No

Comments: _____.

40 CFR 264.175(b); 40 CFR 265.170-178; 40 CFR 273.13 & 273.33 for transport vehicle/vessel **CONTAINER MANAGEMENT** (DMC) 22a-449(c)-102(a); 105 (a), (b); 22a-449(c)-113(a)(1)

Number of areas: **Four permitted container storage areas. For information on three additional areas where containers are handled for transportation purposes, see comment, below.**

Location(s): Drum warehouse, operations building (including 5-day staging area Bays H, M1 and M2), solidification/stabilization area, and flammable materials storage area (outdoors at the tanker loading/unloading area). A total of 13 bays have been permitted for container storage.

Impermeable base: Yes, sealed concrete.

Secondary containment: Yes, sealed berms; spill containment pallets.

Approximate number & sizes of containers: At the container storage areas were ~123 drums, 37 cubic-yard boxes (mostly Paint Care items), 10 totes (250 to 330-gallon) of waste, 32 totes of recyclable used acids, 10 hoppers (2.5 cubic-yard) of metal hydroxide sludge, six roll-off dumpsters of mix pit solids or semi-solids, one small can and one bin. At the 10-Day Truck Staging Area were three roll-off dumpsters and two box trailers. At the Truck-To-Truck Transfer Area were five trucks (one empty) being filled.

Type(s): _X_ steel _X_ poly _X_ fiber _X_ bag/sack ___ lab pack _X_ roll-off, Other: Totes, hoppers and cubic-yard boxes.

Management of containers:

Condition (leaks, ruptures, corrosion, heat, pressure): Good

Containers closed when not in use: Yes

50 foot buffer zone for ignitable and reactive waste: Yes

Incompatibles separated by dike/wall, etc.: Yes

Storage less than 90 days (LQG) **(hazardous waste):** N/A, Clean Harbors is a RCRA Part B-permitted RCRA hazardous waste treatment and storage facility allowed to store wastes for up to one year.

Storage less than one year **(universal waste):** Yes.

Does the generator storing **F006** hazardous waste for up to 180 days follow 262.34(g): ___ Yes _X_ No

Does the generator storing **F006** hazardous waste for up to 270 days follow 262.34(h): ___ Yes _X_ No

Comments:

40 CFR 262.30 – 34 **PRE-TRANSPORT REQUIREMENTS** (DPT) 22a-449(c)-102(a)

Packaging: Good.

Labeling (if applicable, DOT hazard class): Yes, for wastes received from off site and those in the truck-to-truck transfer program.

Marking (Words "Hazardous Waste", generator name & address, manifest document number if being shipped): Yes.

Contents described (e.g. chemical name): Yes.

Proper DOT shipping name: Yes, for wastes received from off site and those in the truck-to-truck transfer program.

Accumulation date: Yes; the oldest observed date was March 29, 2014.

Inventory system (universal waste): Yes.

40 CFR 265.190-202 & 40 CFR 262.34(generators) **WASTE TANKS** (DTR) 22a-449(c)105(a)(1); 105(a)(2)(S)-(W); 22a-449(c)105(e) & 113(a)(1)

Tank inventory/description (note above/underground, location, age, construction, ancillary equipment, capacity & waste type): **Two indoor, aboveground tanks, designated as T-11 and T-14, are identified on the Part B Permit, with Tank T-14 permitted to store RCRA hazardous waste and Tank T-11 permitted to store non-hazardous waste. Tank T-14 is a 10,836-gallon, fiberglass/composite tank, installed in 1994. Tank T-11 is a 4,116-gallon, fiberglass-lined steel tank, installed in ~ 1980. Both tanks have fixed roofs. A conservation vent with closure device, sealed manway, water-stop overflow control, and level controls (providing a continuous reading) were installed on Tank T-14 around September 2009 in order to bring it into compliance with the RCRA Air Standards. Tank T-11 is permitted to receive non-RCRA hazardous waste codes CR02, CR03, and CR04, while Tank T-14 is permitted for approximately 230 RCRA hazardous waste codes and non-RCRA hazardous waste codes CR02 and CR03. NOTE: Mr. Congdon stated that T-11 stores CR04 wastes destined for the waste water treatment system, and T-14 for the past several years has been used to store only CR02 and CR03 non-hazardous waste. For more information, see "Comments", below.**

Adequate secondary containment for tanks and ancillary equipment: _X_ Yes ___ No ___ N/A: **Epoxy-coated concrete floor and walls.**

Describe leak detection system (including ancillary equipment): **Daily visual inspections and high-level alarms.**

Describe corrosion protection system: **NA; tanks are aboveground.**

Special requirements for ignitable and reactive waste: ___ Yes ___ No _X_ N/A: ___

Labeling:

Hazardous waste tanks, words "Hazardous Waste" and description of contents: ___ Yes _X_ No ___ N/A **Tank T-14 is only marked "Non-Hazardous Oil & Water" and Tank T-11 is marked "Alkaline or Oily Waste." Mr. Congdon demonstrated that despite being permitted to store a variety of hazardous wastes, for the past several years Tank T-14 has received only non-hazardous used oil and oily wastewater.**

Universal waste tanks, marked to describe contents (pesticides): ___ Yes ___ No _X_ N/A

Storage less than 90 days (LQG); ___ Yes ___ No: **N/A; permitted to store up to one year.**

Storage less than one year for universal waste: ___ Yes ___ No _X_ N/A: ___

Evidence of releases/leaks: ___ Yes _X_ No: if yes, describe: ___

Was release reported: ___ Yes ___ No: if yes, date (if known): **N/A**

Certification of major repairs to tank: ___ Yes ___ No _X_ N/A. Any out of service tanks: ___ Yes _X_ No:

Comments: **Each waste load to be placed in Tank T-14 is first tested to verify that it is non-hazardous, the used oils are tested for total halogens, and the generator is required to certify that the waste contains less than 500 parts per million of volatile organic compounds. NOTE: The Part B Permit also acknowledges the proposed installation of a third waste storage tank, designated as Tank T-3. This tank is not on site and has never been installed. However, Compliance Schedule Section 5(4)(c) of the Part B Permit required Clean Harbors to submit a timeline for the installation of this tank. To date, the timeline has not been submitted.**

Existing Tank Systems(Installed before January 12, 1987)

Written tank integrity assessment on-site (P.E. certified): _X_ Yes ___ No ___ N/A

Does assessment address all required items: ___ Yes ___ No: if no, explain: **Not evaluated during this inspection, as the integrity assessment report had been reviewed and approved as part of the January 2, 2007 Part B Permit renewal.**

New Tank Systems (installed after January 12, 1987)

Written tank design, construction/installation assessment on-site (P.E. certified): _X_ Yes ___ No ___ N/A

Does assessment address all required items: ___ Yes ___ No: if no, explain: **Not evaluated during this inspection, as the integrity assessment report had been reviewed and approved as part of the Part B Permit renewal.**

Documented installation & tightness test on-site: ___ Yes ___ No

Comments: _____

40 CFR 279 Subpart C

USED OIL-GENERATOR REQUIREMENTS

22a-449(c)-119(a) & (b)

Does the facility generate used oil at this site: _X_ Yes ___ No

Does the facility generate used oil at other sites in CT: ___ Yes _X_ No (if yes, list other sites in "Additional Comments" section)

Is the generator's used oil mixed with other waste(s): _X_ Yes ___ No

If yes, what type of waste is it mixed with: ___ Listed ___ Characteristic _X_ Non-hazardous waste

If mixture is with characteristic hazardous waste, is the combined waste tested for characteristics: __ Yes __ No

Explain: **Clean Harbors receives used oil from off-site generators and bulks it in Tank T-11 and Tank T-14 (co-mingling it with other generators' wastes), or trans-ships it in the original containers to off-site recycling, treatment or disposal facilities.**

Has the total halogen content of the used oil been determined: _X_ Yes ___ No

Was the total halogen content determined by _X_ Testing, or _X_ Generator knowledge

Does generator retain documentation demonstrating the halogen content for at least three years: _X_ Yes ___ No

Are the total halogens: _X_ less than 1,000 ppm ___ greater than 1,000 ppm

If the total halogens are greater than 1,000 ppm, did the generator:

___ Manage as a hazardous waste, or ___ adequately rebut the presumption of mixing with hazardous waste

Explain: **When Clean Harbors discovers a load of used oil received from off-site that has greater than 1,000 parts per million of total halogens, they reject the load to another Clean Harbors' facility.**

Is used oil accumulated on-site in: _X_ Container(s) _X_ Aboveground tank(s) ___ Underground tank(s)

Describe type method and storage: **Containers, Tank T-11 and Tank T-14.**

Are containers and tanks in good condition and not leaking: _X_ Yes ___ No

Are tank(s) and/or container(s) marked with the words "Used Oil": _X_ Yes ___ No

For each container or above-ground tank storing greater than 55 gallons of used oil:

Stored on an impervious surface: _X_ Yes ___ No

Stored within an enclosed building: _X_ Yes ___ No

If not stored within an enclosed building, has adequate secondary containment been provided: ___ Yes ___ No

Are all underground tanks for used oil registered with DEP's UST Program: ___ Yes ___ No _X_ N/A

Does the facility store more than 1320 gallons of oil or other petroleum products in above-ground tanks, process equipment, or containers that are over 55 gallons in size: _X_ Yes ___ No

If yes, does the facility have an SPCC plan: _X_ Yes ___ No

Has the facility had any known releases of used oil: _X_ Yes ___ No

If yes, did the generator: _X_ Report the spill to DEP, and _X_ Comply with "response to release" requirements

Explain: **On May 29, 2014, about 40 gallons of hydraulic oil was spilled from a dump trailer's broken hydraulic line. The release was reported to the Department and cleaned up.**

Does the generator ship used oil via transporters that are permitted and that have notified EPA: _X_ Yes ___ No

If no, Explain: _____

List off-site destination(s) for used oil generated at this site: **In 2014, used oils were shipped to Clean Harbors, South Portland ME, and to Modern Landfill and Recycling, York, PA.**

If facility is a Used Oil Processor or Re-Refiner, they are also responsible for complying with the standards, regarding used oil, in the following sections of this report: Preparedness & Prevention, Contingency Plan, Shipping Record, Waste Analysis Plan, Operating Records and Closure.

40 CFR 262.34(a)(1) **SUBPART BB APPLICABILITY** 22a-449(c)-102(a)(1)

40 CFR 265.1050 & 265.1064(k) 22a-449(c)-105(a)(1)

Does the generator have equipment (valve, pump, compressor, flange, pressure relief device, sampling connection system, or open-ended valve or line) that contacts hazardous waste with greater than 10% organic concentration: ___ Yes[1] _X_ No **Tank T-14 is permitted to store those types of hazardous wastes (e.g., D018, D039, D040, F001 – F005 and others) that can contain greater than 10% volatile organic compounds and therefore make it subject to the requirements of this subpart. However, Mr. Congdon stated that for several years Clean Harbors has not placed any type of hazardous waste in Tank T-14. During this inspection, I reviewed the records for every load placed in the tank since it was last pumped out (total of six loads between August 20th and September 5th), plus spot-checked a few earlier loads placed in the tank. All of the loads had been non-hazardous. NOTE: Compliance Schedule Section 5(3)(g) of the Part B Permit required Clean Harbors to install a carbon control system for Tank T-14 within 180 days of the issuance of the permit on September 30, 2013. Instead of installing the carbon control system, Clean Harbors has elected to store only non-hazardous waste in the tank.**

If yes, does the generator claim that any of this equipment is exempt from Subpart BB due to <300-hour annual use, being in vacuum service, or operating as a recycling unit: ___ Yes ___ No[1] **N/A**

If an exemption is claimed, does the generator have documentation to support this claim, in accordance with 265.1064(k): ___ Yes (describe) ___ No _X_ N/A _____

Has the facility implemented a leak detection and repair (LDAR) program required by the Clean Air Act:

___ Yes ___ No _X_ N/A _____

If yes, has the facility chosen to demonstrate compliance with Subpart BB by documenting compliance with the Clean Air Act, in accordance with 265.1064(m): ___ Yes ___ No ___ N/A

Comments: **Clean Harbors had a report entitled "RCRA Air Compliance Manual", prepared in-house and dated February 28, 2011, outlining the overall requirements of the RCRA Air Standards. Previously, Clean Harbors had a report entitled "RCRA Air Compliance Manual," prepared in-house and dated December 6, 1996, demonstrating that the tanks were not subject to the requirements of Subpart BB because they did not contain hazardous waste with greater than 10% of volatile organic compounds. NOTE: Because Tank T-14 is permitted to store the types of hazardous wastes that can contain greater than 10% organic concentration, the Subpart BB Checklist was completed (attached).**

[1] If the answer to question 1 is YES and the generator does not claim any exemptions, complete and attach the Subpart BB Checklist.

40 CFR 262.34(a)(1)
40 CFR 265.1080 – 265.1090

SUBPART CC APPLICABILITY

22a-449(c)-102(a)(1)
22a-449(c)-105(a)(2)

Tanks:

Does the generator manage hazardous waste with volatile organic concentrations ≥ 500 ppm/wt (on an average annual basis) in tanks: ___ Yes[2] _X_ No **Although Tank T-14 is permitted to receive D018, D039, D040, F001-F005 and other hazardous wastes that can contain greater than 500 ppm of volatile organic compounds, for the past several years Clean Harbors has placed only non-hazardous waste in this tank. NOTE: Compliance Schedule Section 5(3)(g) of the Part B Permit required Clean Harbors to install a carbon control system for Tank T-14 within 180 days of the issuance of the permit on September 30, 2013. Instead of installing the carbon control system, Clean Harbors has elected to store only non-hazardous waste in the tank. Because Tank T-14 is permitted to store the types of hazardous waste that can contain greater than 500 ppm volatile organic concentration, the Subpart CC Checklist was completed (attached).**

If yes, does the generator claim any exemptions from the requirements of this subpart: ___ No[2] ___Yes (explain): **Mr. Congdon claimed that because for the past several years tank T-14 has not held hazardous waste containing greater than 500 ppm of volatile organic compounds, it is not subject to the requirements of Subpart CC.**

[2] If the answer to question 1 is YES and no exemptions are claimed, complete and attach the Subpart CC Checklist.

Containers:

Does the generator manage in **containers (>26 gallons in size, non-satellite)** hazardous waste with volatile organic concentrations equal or greater than 500 ppm/wt (on an average annual basis): _X_ Yes[3] ___ No _____.

Do the containers meet Department of Transportation ("DOT") requirements: _X_ Yes[3] ___ No _____.

Are the containers closed: _X_ Yes[3] ___ No _____.

[3] If the generator manages this waste **only in containers** and the containers are closed and meet DOT requirements, **stop here.** Otherwise, **complete and attach** the Subpart CC Requirements Checklist

40 CFR 262.34(a)(4); 265.30 – 37; 40 CFR 273 Subpart A, B, C & 279.52

PREPAREDNESS & PREVENTION (DPP)

22a-449(c)-102(a); 105(a); 22a-449(c)-113(a)(1) & 119(a)(1)

Arrangements with local authorities: **Yes, the Bristol Fire Department tours the facility at least annually.**

Immediately accessible to internal communications/alarm system: **Yes; evacuation alarms and intercom system.**

Telephone/hand-held two-way radio: **Yes; alarm pull boxes at various locations on site, cell phones and two-way radios are also assigned to various personnel.**

Emergency equipment (fire extinguisher/control, spill control, decontamination equip.): **Yes, equipment is staged in at various locations (e.g., drum building, operations building, loading docks). Equipment includes various types of absorbents, respiratory and personal protective equipment, salvage drums, shovels, pumps, and fire extinguishers. In addition, the sister company, Clean Harbors Environmental Services, is a licensed spill contractor.**

Equipment maintenance: **Good; annual inspections by contractor, plus monthly in-house inspections.**

Access to emergency equipment: **Good.**

Adequate aisle space: **Yes.**

Source of water in the event of a fire: **City water supply.**

40 CFR 265.14

SITE SECURITY (DSS)

22a-449(c)-105(a)

Is claim made that contact/disturbance of waste would not cause injury/violation of 40 CFR265.14(a): ___Yes _X_ No:

If no, is there: _X_ 24-hr surveillance system, or _X_ barrier completely surrounding active portion

Means to control entry: _X_ Yes ___ No **(site fully fenced).**

"Danger – Unauthorized Personnel Keep Out" signs posted: _X_ Yes ___ No

Comments: _____

40 CFR 265.15

INSPECTION SCHEDULE & LOG (DIS)

22a 449(c) 105(a)

Does contact claim inspections are conducted: **Yes.**

Written inspection schedule: **Yes; detailed schedule.**

Inspection log (comment on adequacy of contents: date, time, items inspected, corrective action): **The Part B Permit allows for inspection logs to be maintained electronically. The inspection program includes daily housekeeping and site issues inspections (including loading/unloading areas, tanks, mix pit and truck parking areas), daily truck-to-truck area inspections (see "Comments", below), weekly container storage area inspections, and monthly safety and emergency equipment inspection (also spot-checked weekly). It appears that all required areas were being inspected at the required frequencies, recording the required information (including comments and corrective actions). Inspections are recorded on a notepad, then transferred to to the computerized WIN system, but can also be recorded into a computerized tablet**

that connects to the WIN system. In the computer, once the findings have been entered and submitted, the data cannot be changed. Corrective actions are tracked through the issuance of work tickets, with resolutions similarly recorded.

Documentation:

Daily

All	Loading/unloading areas subject to spills (when in use): **Yes.**
Tanks	Containment, detection, ancillary equipment: **Yes.**
Trtmt	Treatment equipment: **Yes.**

Weekly

Containers	Physical condition: **Yes.**
Containers	Containment system: **Yes.**
Batteries	Storage area: **N/A, although the universal waste area is also inspected.**

Other

All	Safety and emergency equipment (monthly): **Yes.**
Tanks	Cathodic protection (within six months, then yearly): **N/A, tanks aboveground.**
Tanks	Impressed current (every other month): **N/A, tanks aboveground.**

Comments: **The personnel performing the 2014 RCRA inspections were Mr. Congdon, Denise Bujak, Glen Carlson, William Karl Best, and David Cabrel. NOTE: The inspection log for the truck parking areas indicates that container conditions (e.g., closed, marked, in good condition) are checked. However, containers loaded into trucks cannot be accessed for inspection. Compliance Schedule Section 5(4)(a) of the Part B Permit required Clean Harbors to submit a revised inspection plan addressing this and other items. To date, the revised inspection plan has not been submitted.**

40 CFR 265.16 **PERSONNEL TRAINING RECORDS** (DPR) 22a-449(c)-105(a)

Training conducted: **X** Yes ___ No: ___

Last annual review (date): **Various 2014 dates for the annual RCRA refresher, including January 10th, February 3rd, March 3rd, 4th and 26th, April 7th, June 9th, and December 20th.**

New employees: **Yes, new employees are trained upon hiring.**

Written description of training: **Yes; topics include RCRA overview, implementation of the contingency plan, container management, use of personal protective equipment, manifesting, universal waste management, transporter requirements, and other topics.**

Job title, description and name of employee: **Yes.**

Records maintained on-site until closure/3 years for former employees: **Yes.**

Comments: **Compliance Schedule Section 5(1) of the Part B Permit required Clean Harbors to submit, within 30 days of issuance of the permit, documentation that senior management personnel have been trained in the particular requirements of the permit. To date, such documentation has not been submitted.**

40 CFR 265.50-56; 262.34(a)(4) & 279.52(b) **CONTINGENCY PLAN** (DCP) 22a-449(c)-102(a); 105(a) & 119(a)(1)

Plan on-site: _X_ Yes ___ No. Date of plan: **May 2011 (per Part B Permit renewal application), plus pages 8 & 11 were revised per Department approval letter dated June 20, 2012 (addressing local emergency authorities).**

Prepared by: **Clean Harbors personnel.**

Plan sent to local authorities: (police, fire, hospital, emergency response teams): **Yes; cover letters dated July 31, 2012.**

Emergency procedures (fire, explosions, releases/spills): **Yes, the plan identifies the regulated units, addresses fires, spills, weather, and air emissions, describes emergency coordinator duties and notification procedures.**

Emergency coordinator(s) name, address, home and office phone: **Yes, but partially outdated. The primary coordinator is Mr. Congdon, one alternate is Glenn Carlson, but the other alternate is Annmarie Drugonis, who left the company in April 2013. See "Comments", below.**

Emergency equipment list, location, description, capabilities: **Yes; detailed.**

Evacuation plan (signal, primary and alternate routes): **Yes, includes site diagram, routes of egress, rally points and contact list.**

Comments: **NOTE: Compliance Schedule Section 5(5)(a) of the Part B Permit required Clean Harbors to submit a revised contingency plan addressing the outdated list of emergency coordinators and the new permitted capacities of certain waste management areas. To date, the revised contingency plan has not been submitted.**

40 CFR 265.73 & 279.57 **OPERATING RECORDS** (DRR) 22a-449(c)-105(a)(2)(I) & (J) & 119(a)(1)

Are the following records maintained on-site:

Wastes received from off-site: **Yes.** Wastes from on-site: **Yes.**

Waste description: **Yes.**

Waste quantity: **Yes; daily and weekly waste inventories are performed using a bar-code scanner and recorded (hard-copy and computerized) on daily inventory forms.**

Comments: **All waste tracking is computerized and recorded on such hard copy documents as vehicle off-load authorization forms, laboratory forms, manifests, and waste profile sheets.**

Methods of and dates of storage/treatment/disposal: _X_ Yes ____ No: **All waste movements, whether to storage, treatment or transportation areas, are tracked through the hard-copy records and computerized WIN system via bar-codes tags, waste receiving reports, transfer tickets and/or critical-step tickets.**

Waste inventory (including type, volume & location):

in storage: **Yes, described above. At any given moment, the WIN system can identify the amounts and types of wastes currently in storage, treatment or transit.**

disposed of on-site (recorded on map): **N/A**

cross-referenced to specific manifest: **Yes, via the computerized "Web Profile" and WIN system.**

Analytical results for:

permitted waste: Yes, see the "Waste Analysis Plan" section of this report.

monitoring wells: N/A

trial test (to assure compatibility with tanks, impoundments, or waste piles): Not evaluated, as installation reports for the hazardous waste tanks were reviewed and approved by the Department during the RCRA Part B Permit application . process.

Report/summary of any incidents requiring implementation of the contingency plan: Yes, as required. Ten spills or releases were reported in 2013, and three were reported so far in 2014.

Records and results of inspections: Yes.

Closure/Post Closure cost estimates: Yes.

Does the facility maintain a copy of the LDR notification or certification for each waste received: X Yes ___ No

Comments: The computerized "Web Profile" and WIN systems contain all waste profile numbers, generator names, drum or bulk load numbers, pre-qualification characterizations and off-load verification analyses. Various screens within these programs (e.g., "Drum Viewing", "Viewing Activities") identify dates of receipt, re-packaging, treatment and shipment off site. Also, all rejected loads are recorded in the operating records. Additional record-keeping is performed in the Quality Assurance Laboratory, described in the "Waste Analysis Plan" section of this report.

40 CFR 265.13(b) & 279.55 **WASTE ANALYSIS PLAN** (DWA) 22a-449(c)-105(a)(2)(f) & 119(a)(1)

Plan on-site: X Yes ___ No Date of plan: September 30, 2013 (per the Part B Permit), supplemented by the May 1, 2011 plan (per the Part B Permit renewal application). Prepared by: Clean Harbors personnel.

Does plan include:

Testing parameters: X Yes ___ No:

Test methods: X Yes ___ No: Reference EPA's SW-846 Test Method protocols.

Sampling methods: X Yes ___ No:

Testing frequency: X Yes ___ No:

Copy of results on-site: Yes.

Comments: The following is a summary of Clean Harbors' waste analysis procedures for inbound wastes:

1) Pre-Qualification: The purpose of pre-qualification is to determine the acceptability of candidate waste streams prior to being accepted at the facility. The September 30, 2013 waste analysis plan ("WAP") requires that a representative sample of each waste stream be submitted, while also acknowledging that manufacturer's and/or process information may be utilized. Clean Harbors also relies upon Generator Waste Material Profile Sheets completed by the generators. The profile sheets are usually based upon generator knowledge, in lieu of testing. Mr. Congdon stated that a combination of laboratory personnel, Clean Harbors' on-line central profiling group, and himself decide whether or not sample analysis or generator knowledge will be acceptable for a candidate waste stream. Mr. Congdon provided some examples of when testing would be required (e.g., destined for

wastewater treatment system, generator uncertainty, field representative observes housekeeping problems) and when generator knowledge would be accepted (e.g., oil/water separators, known listed wastes, lab-packs, truck-to-truck transfer streams, universal wastes, spill clean-up wastes). Candidate waste streams are assigned waste profile numbers and entered into the WIN system. Annual re-characterizations are performed on all pre-qualified waste streams.

Clean Harbors also has separate intra-company waste profiles that are used to ship waste from one Clean Harbors facility to another. For example, Clean Harbors of Braintree will receive a waste from a generator under that generator's waste profile number, but reassign a different waste profile number to it when shipping it from Braintree to Bristol. This is done because a) different facilities perform different handling or treatment, and one Clean Harbors facility can only ship wastes to another Clean Harbors facility if those wastes are pre-approved to be handled by the second facility, and b) multiple waste streams from multiple original generators may be combined into one intra-company shipment.

2) Off-Load Verification: All waste received from off-site, with the above-noted exceptions, shall be sampled and the samples analyzed within five days of when the waste arrived on-site. If deemed acceptable, a vehicle off-load authorization form ("VOAF") is completed. Clean Harbors then samples each container and tanker of waste upon receipt for "verification testing" in accordance with Section 1.6.1 of the May 1, 2011 WAP. Verification testing and a determination to accept or reject the waste must be completed within five days of receipt of the load. Samples from multiple non-bulk containers of the same waste from the same generator are composited (maximum four grab samples per composite as described in Section 1.3.1 of the May 1, 2011 WAP). Samples are usually analyzed the same day the sample was taken for physical appearance, pH, ignitability, chlorine content, BTU value, miscibility in water, reactivity and radioactivity. Clean Harbors records the analytical results on "Waste Receiving Reports" (one for each sample analysis), which for bulk (i.e., tanker) loads are referred to as "Bulk Receiving Reports". For some parameters, the chemist bases his determination upon knowledge rather than chemical analysis. If the analysis indicates that the load is acceptable, a transfer ticket is prepared, allowing the waste to be placed into storage or treatment units. If the waste is to be treated on site, more extensive analytical testing is performed (described below).

3) Waste Treatment Batches: Retained samples from the off-load verification tests are analyzed for compatibility and treatability via bench-scale testing to determine which wastes will comprise a treatment batch. Samples being compatibility tested are allowed to sit for three hours (drum loads) or 20 minutes (bulk loads) to watch for signs of chemical reactions. Analytical results are recorded on laboratory "Quality Control Sheets", which get attached to the Waste Receiving Reports. From this data, chemists determine the drums or bulk loads that will comprise a treatment batch. On these forms and, when necessary, on "Critical Step Tickets", the laboratory identifies specific treatment methods, treatment chemicals, feed rates and high-hazard concerns. During treatment, lab personnel periodically sample and test the batches to ensure proper treatment, issuing additional

Critical Step Tickets as needed. When treatment is completed, chemists issue final transfer tickets allowing the batch to be pumped to one of the final treatment tanks or 35,000-gallon wastewater basins. For wastes to be solidified/stabilized, chemists perform "bucket tests" to ensure compatibility and treatability, mixing small amounts of wastes and solidification/stabilization compounds in a bucket. Test results are recorded Waste Receiving Report and transfer tickets are issued for those wastes to be moved to solidification/stabilization.

Comments: NOTE: Compliance Schedule Section 5(3) of the Part B Permit required Clean Harbors to submit a revised WAP, reformatting it and addressing changed waste management capacities, changed waste codes, compliance with the RCRA Air Emission Standards, the new Paint Care program, and several other items. To date, the revised waste analysis plan has not been submitted.

40 CFR 265.110-116 & 279.54(h) **CLOSURE PLAN** (DCL) 22a-449(c)-105(a)(1)(F)-(I) & 119(a)(1)

Have any regulated units closed: ___ Yes _X_ No: ___

If yes, is closure certified by owner/P.E.: ___ Yes ___No Date of closure certification: N/A

Is closure certification on-file at the DEP: ___ Yes ___ No – N/A

Closure plan on-site: _X_ Yes ___ No Date of plan: May 1, 2011, incorporated into Part B Permit. See "Comments", below, for permit compliance schedule requirements. Prepared by: In-house.

Status of closure plan (approved and date): Acknowledged under the RCRA Part B Permit. See "Comments", below, for permit compliance schedule requirements.

Does plan include all regulated units (compare plan with Part A & on-site operations): Partial; the plan appears to address all required units except for proposed Tank T-3 and the Paint Care processing area, although the latter is contained within the Drum Warehouse, which is included in the plan. In addition, see "Comments", below, concerning the former RCRA hazardous waste sludge pile.

Does plan include (indicate presence/absence, comment on adequacy):

Estimate of maximum inventory: _X_ Yes ___ No: Itemized for each of the regulated units. See "Comments", below, for permit compliance schedule requirements.

Description of how each unit will be closed & methods to be used during closure: _X_ Yes ___ No: ___

Description of steps needed to remove/decontaminate equipment/structures/soil: _X_ Yes ___ No: Included in the site characterization work plan section of the closure plan.

Schedule for closure of each unit & for final closure (time-frames & milestones): _X_ Yes ___ No: ___

*Estimate of expected year of final closure: ___ Yes ___ No _X_ N/A: ___

Comments (e.g., operations do not match plan, amendments needed): Until May 4, 1990, Clean Harbors maintained a hazardous waste pile (up to 50 cubic yards of wastewater treatment sludge) located in the roofed area where sludge hoppers currently receive sludge off the filter presses. This area was identified on the facility diagram "Drawing No. 104 C-01" that was incorporated in a previous Part B Permit. According to information in the September 2005 RCRA

inspection report, a) the waste pile was removed on May 4, 1990, and b) a closure plan dated July 1990 for this RCRA storage unit was submitted to the Department on April 5, 1994. The Department has not yet reviewed or approved this closure plan. As a result, Clean Harbors has not yet implemented the closure procedures (i.e., the area was power-washed, but the five proposed core samples have not been collected and closure has not been certified). The original 1990 closure cost estimate for the waste pile was $28,517. The current closure plan and closure cost estimate do not address this area. As noted in the 2012 RCRA inspection report, the contacts believed that the footprint of the area where the former waste pile had been located is identical to that where the hoppers of (now non-hazardous) metal hydroxide sludge from the waste water treatment system are currently staged, at the rear of the spill control area. The spill control area is addressed in the current closure plan and financial assurance instrument.

NOTE: Compliance Schedule Section 5(6) of the Part B Permit required Clean Harbors to submit a revised closure plan addressing newly installed waste management units, proposed Tank T-3, new storage capacities, the Paint Care program, and other items. To date, the revised closure plan has not been submitted.

* Only needed for facilities without approved closure plans and for facilities, using a trust fund for financial assurance whose remaining operating life is < 20 years

40 CFR 265.117-121 **POST CLOSURE PLAN** (DCL) 22a-449(c)-105(a) (1) (J) – (L)

N/A

Plan on-site: ___ Yes ___ No Date of plan: _____ Prepared by: _____.

Status of Post-Closure plan (e.g., approved & date): _____.

Does plan include description & frequency of:

monitoring activities: ___ Yes ___ No: _____.

maintenance & inspection activities (e.g., int ground water monitoring): ___ Yes ___ No : _____.

name, address, telephone number of post-cl ___ Yes ___ No: _____.

length of post-closure period: ___ Yes ___ No: _____.

Certification to the Commissioner that notation on deed has been recorded: ___ Yes ___ No: _____.

Record sent to the Commissioner of the type, location & quantity of hazardous waste disposed of in each cell/disposal unit: ___ Yes ___ No: _____.

FINANCIAL REQUIREMENTS (DFR)

40 CFR 265.142 CLOSURE COST ESTIMATE 22a-449(c)-105(a)(1)

Estimate on-site: X Yes ___ No. Amount of estimate: **$ 3,728,935**.

Date of most recent adjustment: **September 9, 2014.**

Comments: _____.

40 CFR 265.143 — FINANCIAL ASSURANCE FOR CLOSURE — 22a-449(c)-105(a)(1) & 105(a)(2)(O)

Type of mechanism **(circle all applicable)**: trust fund, surety bond, letter of credit, **insurance**, financial test/corporate guarantee

Amount of coverage: **$ 3,860,718**. Comments: **The coverage includes the closure cost estimate of $3,728,935 and the corrective action cost estimate of $131,783. Coverage is provided by certificate of insurance policy no. PEC004201201 with Indian Harbor Insurance Company, located in Stamford, CT. NOTE: Clean Harbors also has certificate of insurance policy no. ENC 3681588-04 with Steadfast Insurance Company, located in Schaumburg, Illinois, addressing the cost of closure and corrective action. On September 6, 2013, Clean Harbors changed their insurance provider from Steadfast to Indian Harbor, but both policies remain in effect until the Department approves the release of the previous insurance provider. On July 2, 2014, the Department sent Clean Harbors a letter requesting additional information on this matter. On September 23, 2014, immediately following this inspection, Clean Harbors submitted a response to the Department's information request. On September 30, 2014, staff of the Department reviewed the submittal and determined that the new policy was acceptable, enabling Clean Harbors to cancel the Steadfast policy (September 30th e-mail attached).**

40 CFR 265.144 — POST-CLOSURE COST ESTIMATE — 22a-449(c)-105(a)

Estimate on-site: ___ Yes ___ No. Amount of estimate: **$ N/A**. Date of most recent adjustment: ___.

Comments: **N/A**

40 CFR 265.144 — FINANCIAL ASSURANCE FOR POST-CLOSURE — 22a-449(c)-105(a)(1) & 105(a)(2)(P) & (R)

Amount of coverage: **$ N/A**. Comments: **Post-closure not required.**

40 CFR 264.101 — FINANCIAL ASSURANCE FOR CORRECTIVE ACTION — 22a-449(c)-104(a)(1)&(2)(O)

Type(s) of mechanism(s) **(highlight all)**: trust fund, surety bond, letter of credit, **insurance,** financial test/corporate guarantee

Amount of coverage: **$ 131,783**. Comments: **Coverage is provided by certificate of insurance policy no. PEC004201201 with Indian Harbor Insurance Company, located in Stamford, CT. The policy is in the amount of $3,860,718, covering both the closure cost estimate and the corrective action cost estimate.**

FINANCIAL REQUIREMENTS (DFR)

40 CFR 265.17 — LIABILITY INSURANCE — 22a-449(c)-105(a)(1) & 105(a)(2)(R)

Sudden accidental occurrences (all TSDF's)

Type of mechanism ___ trust fund ___ surety bond ___ letter of credit **X** insurance ___ financial test/corporate guarantee

Does the financial mechanism provide at least $1 million coverage per occurrence with at least an annual aggregate amount of at least $2 million: _X_ Yes ___ No

~~Non-sudden~~ accidental occurrences (impoundments landfills & land treatment facilities)

Type of mechanism ___ trust fund ___ surety bond ___ letter of credit ___ insurance ___ financial test/corporate guarantee

Does the financial mechanism provide at ~~least $3 million~~ coverage per occurrence with at least an annual aggregate amount of at least $6 million: ___ Yes ___ N/A

If the owner/operator must meet both liabilit[illegible]nd chooses to combine both coverage levels, does the financial mechanism provide at least $4 million coverage per occurrence ~~with an annual aggregate~~ of at least $8 million: ___ Yes ___ No

Comments: **Liability insurance is provided by Steadfast Insurance Company, located in Schaumburg, Illinois, via policy number PLC 3743936-11. The limits of liability are listed as $1,000,000 for each claim and $2,000,000 annual aggregate.**

40 CFR 263 & 273 Subpart D **HAZARDOUS WASTE TRANSPORTATION** (TOR) 22a-449(c)-103; 113(a)(1); 22a-449(c)-11

Does the handler transport waste: ___ Yes _X_ No – **see comment.**

Does the transporter have a 22a-449(c)-11 permit: ___ Yes ___ No

If a permit is not required:

Shipping documents maintained on-site (**hazardous waste**): _____.

Less than 1,000 kg/mo shipped using handler's vehicle (**hazardous waste**): _____.

Universal waste transported to: ___another handler ___ destination facility ___ other: _____.

Comments: **Clean Harbors' facility at 51 Broderick Road does not transport wastes. However, Clean Harbors' corporate headquarters, located in Braintree, Massachusetts, has a waste transportation division for the entire company (including the Broderick Road facility). The transportation division, named Clean Harbors Environmental Services, Inc. is managed primarily from the Braintree facility, but has a manager, staff and equipment located at 770 Derby Avenue, Seymour. In ~November 2013, this division was relocated to Seymour from 761 Middle Street, Bristol.**

PHOTOS TAKEN

(include: number taken, location, brief description or attach copy of photo log)

None.

SAMPLES TAKEN

(attach copy of lab invoice and chain-of-custody form and describe sample collection below)

None.

COMMENTS ON OTHER AREAS OF ENVIRONMENTAL CONCERN

Noted in report.

ATTACHMENTS

(If the facility's operations include the following regulatory areas, please check-off the appropriate subject and attach to report)

_X_ **SOLID WASTE** – Business Recycling Checklist

_X_ **ATTACHMENT A:** Import/Export requirements

_X_ **ATTACHMENT R:** Subpart BB Requirements

_X_ **ATTACHMENT S:** Subpart CC Requirements

EXIT MEETING

Closing meeting held at conclusion of inspection: _X_ Yes ___ No

List attendees and their titles: **Eric Congdon; Facility General Manager.**

Areas reviewed: **Clean Harbors has not submitted or installed any of the eight items required of the Part B Permit Compliance Schedule (Section 5), all of which were due within 30 to 180 days of the issuance of the permit on September 30, 2013. Mr. Congdon believed that this was due to the fact that on November 14, 2013, Clean Harbors filed a "Petition for Administrative Appeal" challenging that certain terms and conditions of the permit will detrimentally impact the facility. The permit conditions being challenged involve maximum storage and processing capacities, acceptable RCRA waste codes, acceptable storage time frames (e.g., truck-to-truck transfer area), and the inspection procedure for the trailer storage area. Negotiations regarding the appeal remain on-going.**

Field citation issued: ___ Yes _X_ No, if yes, citation number: _____

INSPECTOR: Paul Hasler **DATE:** 10/16/14

ATTACHMENT A

40 CFR 262.20 & 50-58 **IMPORT/EXPORT REQUIREMENTS** (GEX) 22a-449(c)-102(a)

40 CFR 265.12 22a-449(c)-105(a)(1)
40 CFR 273.20, 40 & 56 22a-449(c)-113(a)(1)

Has any waste been exported/imported during the last 3 years: _X_ Yes ___ No

Exports:

Current "Acknowledgement of Consent" form attached to manifest for each export shipment: _X_ Yes ___ No – **On December 4, 2013 and January 14, 2014, EPA acknowledged receipt of Clean Harbors' notices of intent to export, the second acknowledgement referring to a revised notice of intent.**

Annual report filed with EPA's administrator by March 1st of each year: _X_ Yes ___ No – **between January 1 and August 31, 2014, Clean Harbors exported 423,984.06 pounds of hazardous waste to Clean Harbors Canada, Inc., located in Corunna, Ontario.**

Any exception reports on file: ___ Yes ___ No _X_ N/A: if yes, explain: _____

Completed special manifest requirements(i.e.: additional language): _X_ Yes ___ No

Imports:

Are wastes received from a foreign source: ___ Yes _X_ No

If yes, has notice been filed with EPA: ___ Yes ___ No

Comments: _____

ATTACHMENT R

40 CFR 262.34(a)(1) **SUBPART BB REQUIREMENTS** 22a-449(c)-102(a)(1)

40 CFR 265.1050 - 265.1064 22a-449(c)-105(a)(1)

GENERAL

Does the facility have a list of each piece of equipment that is subject to Subpart BB: _X_ Yes ___ No

If yes, does the list include all required items: _X_ Yes ___ No: _____.

Did the facility mark all required equipment in such a manner that it can be distinguished readily from other pieces of equipment: _X_ Yes ___ No _____.

Does the facility have an analysis determining whether the hazardous wastes in units subject to 265.1052 through 265.1060 are heavy liquids: _X_ Yes ___ No **Tank T-14 is permitted to store those types of hazardous wastes (e.g., D018, D039, D040, F001 – F005 and others) that can contain greater than 10% volatile organic compounds and therefore make it subject to the requirements of this subpart. However, Mr. Congdon stated that for several years Clean Harbors has not placed any type of hazardous waste in Tank T-14. During this inspection, I reviewed the records for every load placed in the tank since it was last pumped out (total of six loads between August 20th and September 5th), plus spot-checked a few earlier loads placed in the tank. All of the loads had been non-hazardous.**

Does the facility operate a closed-vent system with control device: ___ Yes _X_ No **Tank T-14 appears to be a closed-vent system, but it is not equipped with a control device. NOTE: Compliance Schedule Section 5(3)(g) of the Part B Permit required Clean Harbors to install a carbon control system for Tank T-14 within 180 days of the issuance of the permit on September 30, 2013. Instead of installing the carbon control system, Clean Harbors has elected to store only non-hazardous waste in the tank.**

If YES, does the facility have a written design analysis: ___ Yes ___ No **NA; no control device.**

If YES, does the design analysis contain all of the items required in accordance with 265.1035(b)(4):

___ Yes ___ No (explain) **NA; no control device.**

Does the facility have a certification signed and dated by the owner or operator that the control device is designed to operate at the performance level designated in the design analysis: ___ Yes ___ No – **NA; no control device.**

EQUIPMENT IN LIGHT LIQUID OR GAS/VAPOR SERVICE

Are any pumps or valves in light liquid or gas/vapor service: ___ Yes _X_ No

If yes, identify equipment and type of service: _____.

Is each pump in light liquid service checked by visual inspection each calendar week for indications of liquids dripping from the pump seal? ___ Yes ___ No **NA**

Designated as operating at no detectable emissions:

Does the facility designate any pump, compressor or valve to be operating at no detectable emissions (i.e., less than 500 ppm above background): ___Yes _X_ No

If yes, is the pump, compressor or valve operating in compliance with the requirements of

265.1052(e), 265.1053(i) and/or 265.1057(f): ___ Yes ___ No (explain): _____.

NOT designated as operating at no detectable emissions:

Is each pump or valve in light liquid service NOT designated as operating at no detectable emissions air-monitored monthly to detect leaks? ___ Yes ___ No **NA; not operating in light liquid service.**

If YES, does the facility record monthly air monitoring inspections of each pump or valve in light liquid service:

___ Yes ___ No _____.

Are leaks (>10,000 ppm) from each pump or valve repaired on the 5-day/15-day requirement:

___ Yes ___ No ___ N/A(explain) _____.

Is the air monitoring instrument calibrated before use each day: ___ Yes ___ No – **NA; not in light liquid service.**

Does the facility designate any valves in light liquid service as unsafe-to-monitor or difficult-to-monitor:

___ Yes (identify) ___ No **NA; not in light liquid service.**

If yes, are such valves monitored using the alternative methods specified in 265.1057(g) and (h):

___ Yes ___ No _____.

Does the facility have any dual mechanical seal pumps with a barrier fluid system? ___ Yes X No

If yes, is the dual mechanical seal system operated in accordance with the requirements of 265.1052(d):

___ Yes ___ No _____.

Does the facility have any pumps that are equipped with a closed vent system capable of capturing and transporting any leakage from the seal/seals to a control device: ___ Yes ___ No X NA

If YES, such pumps are exempt from the requirements of 265.1052(a) through (e).

Comments: _____.

EQUIPMENT IN HEAVY LIQUID SERVICE

Are pumps or valves in heavy liquid service and flanges and other connectors in light or heavy liquid service inspected for leaks by visual, olfactory, or any other detection method: X Yes ___ No ___ NA

Tank T-14 is inspected daily, but it is not currently operating in heavy liquid service (not storing hazardous waste).

If evidence of a potential leak is detected, is the potential leak air monitored within 5 days of discovery: ___ Yes ___ No X NA

Are leaks (>10,000 ppm) repaired on the 5-day/15-day requirement: ___Yes ___ No ___ NA

LEAK DOCUMENTATION

Was any leaking equipment identified and marked as required in accordance with 265.1064(c):

___ Yes (describe) ___ No X N/A _____.

If a leaking valve in light liquid or gas/vapor service had been repaired, was it air monitored for two consecutive months following the repair to verify that it no longer leaked: ___ Yes ___ No _X_ N/A

Does the facility have a record of each leak detected under the requirements of 265.1052, 265.1053, 265.1057 and 265.1058: ___Yes ___ No – **claim NA.**

If YES, does the record contain all required items in accordance with 265.1064(d): ___ Yes ___ No

ATTACHMENT S

40 CFR 262.34(a)(1) **SUBPART CC REQUIREMENTS** 22a-449(c)-102(a)(1)

40 CFR 265.1080 – 265.1090 22a-449(c)-105(a)(2)

Did the facility determine the average volatile organic concentration of the hazardous waste in each container or tank exempted from this subpart in accordance with 265.1083(c)(1): _X_ Yes ___ No (explain) ___ N/A _____.

If yes, did the facility determine the volatile organic concentration using: _X_ direct measurement, or _X_ knowledge of the waste – **both testing and knowledge of the waste have been utilized.**.

If using knowledge of the waste, is there documentation of the information used as the basis for this determination: _X_ Yes ___ No ___ N/A: **Mr. Congdon stated that for the past several years, Clean Harbors has not stored hazardous waste in Tank T-14, and therefore has not been subject to the requirements of Subpart CC. This reportedly can be documented using the computerized WIN system. I spot-checked various loads placed in the tank, all of which appeared to be non-hazardous. However, Tank T-14 is permitted to store those types of hazardous wastes (e.g., D018, D039, D040, F001 – F005 and others) that can contain greater than 500 ppm/wt. volatile organic concentration, therefore making it subject to the requirements of Subpart CC.**.

If using direct measurement, does it have a written sampling and analysis plan that describes the procedures by which representative samples will be collected and handled: ___ Yes ___ No _X_ N/A:_____.

Does the facility operate a closed-vent system with control device: ___ Yes (describe) ___ No **Partial; Tank T-14 appears to be operated as a closed-vent system (i.e., manhole sealed, closable conservation vent, and water seal in trap on overflow line), but is not equipped with a control device. NOTE: Compliance Schedule Section 5(3)(g) of the Part B Permit required Clean Harbors to install a carbon control system for Tank T-14 within 180 days of the issuance of the permit on September 30, 2013. Instead of installing the carbon control system, Clean Harbors has elected to store only non-hazardous waste in the tank.**.

If yes, does the facility have a written design analysis: ___ Yes ___ No: **N/A**.

If yes, does the design analysis contain all of the items required in accordance with 265.1035(b)(4):

___ Yes ___ No: (explain) **N/A**.

Does the facility have a certification signed and dated by the owner or operator that the control device is designed to operate at the performance level designated in the design analysis: ___ Yes ___ No – **claim N/A**

TANKS

If the facility manages hazardous waste with volatile organic concentrations equal or greater than 500 ppm/wt (on an average annual basis) **in tanks,** complete the following table for the tanks managing this waste.

TANK ID	TANK CAPACITY (gallons)	WASTE TYPE	DESIGN (fixed or floating roof)	LEVEL OF CONTROL (1,2 or 3)
T-14	10,836 gal.	Oily liquid with various RCRA waste codes	Fixed roof	Level 1

For a fixed-roof tank using Level 1 Controls, did the facility determine the maximum vapor pressure of the waste:

_X_ Yes ___ No ___ N/A – **For the past several years, it appears that Tank T-14 has received only non-hazardous waste.**

If yes, did the facility record the results of the maximum vapor pressure determination:

_X_ Yes ___ No ___ N/A **The determination was based upon process knowledge. However, each load placed in the tank had been tested to ensure that it was non-hazardous.**

Did the facility inspect the fixed roof and its closure devices immediately upon putting the tank into service and at least once per year: _X_ Yes ___ No ___ N/A _____.

In the event of a defect involving a tank system, did the facility make first repairs no later than 5 calendar days after detection and complete repairs no later than 45 calendar days after detection:

___ Yes ___ No _X_ N/A _____.

If a floating roof tank is used, has the facility notified the Regional Administrator 30 days prior to a planned inspection and as soon as possible in the case of an unplanned inspection:

___ Yes ___ No _X_ N/A _____.

Are tank(s) used for waste stabilization utilizing a Level 2 control: ___ Yes _X_ No ___ N/A

Comments:_____.

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

SOLID WASTE - BUSINESS RECYCLING CHECKLIST

CT DEP Inspectors use this form during their Inspections to assess compliance with the Recycling law, in accordance with Section 22a-241b(d) of the Connecticut General Statutes.

Name of Facility/Site: **Clean Harbors of Connecticut, Inc.**
Address: **51 Broderick Street**
Town: **Bristol**
Date of Inspection: **September 17, 2014**
Name of Inspector: **P. Hassler**
Site Contact/Title: **Eric Congdon, Facility General Manager.**
Phone Number: **860-583-8917, ext. 321**

Does the company have a solid waste recycling program: X Yes ___ No
If so, which items are recycled:

Mandatory –

- X Corrugated Cardboard
- X Newspaper
- X White Office Paper
- X Glass/Metal – Food/Beverage Containers
- ___ Scrap Metal
- X Ni-Cd Rechargeable Batteries
- X Used Oil (crankcase)
- X Lead-Acid Batteries (from vehicles)
- ___ Leaves (composted)
- ___ Grass Clippings

Other –

- X Electronics
- ___ Hearing Aid Batteries
- X Plastic Containers (PET #1 and HDPE #2)
- ___ Shrink Wrap
- X Paper Beverage Containers (Milk cartons and juice packages)
- ___ Other (list):
- X Mercury Containing Equipment (including thermometers)
- X Magazines
- X Discarded Mail

Name and title of person assigned to oversee the company's solid waste and recycling efforts:
Eric Congdon, Facility General Manager

Name and title of person assigned to manage the company's solid waste and recycling efforts:
Eric Congdon, Facility General Manager

Name(s) and title(s) of person(s) who collects solid waste and maintains separation of recyclables (custodial staff person, company/service, etc.):

Name of trash hauler: **Patterson Enterprises, Bristol.**
Does the same hauler provide recycling services: **Yes; also U.S. Lamp, Cincinnatti, OH; Iron Mountain (shredding of business papers)**
If not, who does: **See above.**
Are separate containers provided: **Single stream recycling, plus separate containers for universal wastes.**
Did you take any photographs during the inspection? **No.**

Is there a solid waste and recycling contract for services: **Uncertain.**

Identify contact person for contract information (corporate office, building management, etc.) including their phone number:
Is there a waste reduction, pollution prevention, or sustainability program or a "green team" for the company: **Yes; corporate "Green Team" (called the 'Sustainability Group') out of Norwell, MA.**
If yes, describe briefly: **Provide periodic announcements, updates and procedures regarding recycling, waste minimization and pollution prevention.**
Storage areas for recycled material: Inside/Outside **Both.**
Exposed to storm water? **No; covered.**
Observations the inspector should make:

1) Is there evidence of a recycling program? Check to see if there are recycling containers in logical locations, both inside and outside the building. Are all containers clearly labeled? For example, posting that clearly explains how recyclables should be managed; office paper recycling bins near copy machines and at individual workstations; bottle and can receptacles in cafeteria or break room; containers for corrugated cardboard in shipping/receiving area; dedicated dumpsters for recyclables near garbage area or shipping/receiving area; etc: **Yes; appears to be well managed.**

   Are the recycling containers being properly used? For example, are the recycling bins contaminated with trash? Are the proper recyclables in the designated bins? **Yes; appears to be well managed.**

2) Do they educate staff as to the proper management of recyclables? **Yes.**

Outbound Wastes January - September 2014						
Profile	Waste Description	Qty		Destination EPA ID#	Destination Location	Waste Code(s)
11-0818	Non Hazardous Solid	3,933	Tons	PAD987395803	Modern Landfill and Recycling, York, PA	CR02 , CR03 , CR04 , CR05
476795PAE	Non Hazardous Solid	672	Tons	PAD000429589	Geological Reclamation Morrisville, PA	NONE
A22K-INT-AIR	Low Btu Organic Liquid	220	Gallons	TXD055141378	Clean Harbors, La Porte, TX	D007, D039, D040, D043, F001, F002, F003, F005, OUTS204H
A22k-inter	Low Btu Organic Liquid	703	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001 , D018
A22K-INTER-NH	Low Btu Organic Liquid	644	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	NONE
A24B-INTER	Aqueous Brake Cleaner	721	Pounds	ILD980613913	Safety-Kleen, Dolton Il	NONE
A24W-INTER	Aqueous Parts Washer	2,680	Gallons	RID084802842	Safety Kleen Cranston, RI	NONE
A31-inter	Specification Oils	660	Gallons	NED981723513	Clean Harbors, Kimball NE	NONE
A32NONEB	Specification Oil & Water	33,300	Gallons	MED980672182	Clean Harbors South Portland, ME	CR02
AA37-INTER	Purge Solvent Blend	1,512	Pounds	ILD980613913	Safety-Kleen, Dolton Il	D001, D018, D035, D039, D040, F003, F005
AA42-INTER	Petroleum Naphtha, caustic immersion cleaner	130	Gallons	ILD980613913	Safety-Kleen, Dolton Il	D006, D008, D018, D027, D039, D040
AG-CA1-CYANIDE	Solids Less Than 1% Cyanide Or Sulfide	2,709	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D006 , D007
AG-CA3-CYANIDE	Solids Less Than 5% Cyanide Or Sulfide	7,186	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D003
AG-CA4-INTER	Solids Less Than 20% Cyanide Or Sulfide	3,476	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D003 , D006 , D007 , F007 , F009
AG-CA5-INTER	Solids Greater Than 20% Cyanide Or Sulfide	1,909	Gallons	ARD069748192	Clean Harbors, El Dorado, AR	D003
ASBNHNR	Asbestos Waste	5	Gallons	OKD065438376	Clean Harbors, Waynoka, OK	NONE
B22AE-INTER	Concentrated Acids From Electroplating	45	Gallons	OHD000724153	Clean Harbors, Clevland, OH	D002
B22CE-INTER	Chromic Solutions From Electroplating	1,075	Gallons	OHD000724153	Clean Harbors, Clevland, OH	D002 , D006 , D007 , D008 , D010
B22FE-INTER	Hydrofluoric Acid From Electroplating	1,100	Gallons	OHD000724153	Clean Harbors, Clevland, OH	D002
B22NE-INTER	Nitric Acid Solutions From Electroplating	575	Gallons	OHD000724153	Clean Harbors, Clevland, OH	D001 , D002 , D007
B26BE-INTER	Alkaline Wastewater From Electroplating	330	Gallons	OHD000724153	Clean Harbors, Clevland, OH	D006 , D007
B28E-INTER	Oxidizer Solutions From Electroplating	15	Gallons	OHD000724153	Clean Harbors, Clevland, OH	D001 , D002
B29A-INTER	Low pH Cyanide / Sulfide Solutions	60	Gallons	ARD069748192	Clean Harbors, El Dorado, AR	D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F006
B29E-INTER	Cyanide/Sulfide Solution From Electroplating	335	Gallons	ARD069748192	Clean Harbors, El Dorado, AR	D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F006
B29-INTER	Cyanide / Sulfide Solution	275	Gallons	ARD069748192	Clean Harbors, El Dorado, AR	D002 , D003
B29O-INTER	Cyanide And Sulfide Solutions For Incineration	1,963	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D002
B35-INTER-NH	Glycols	267	Pounds	OHD980587364	Clean Harbors, Hebron, OH	NONE
CA127	Chromic Acid Greater Than 20 Percent Concentration	165	Gallons	COD991300484	Clean Harbors, Deer Trail, CO	D001 , D002 , D007 , F019
CBPNONEB	Solids To Hazardous Landfill	7,231	Gallons	OKD065438376	Clean Harbors, Waynoka, OK	NONE
CCRC-ALKLIQAIR	Corrosive Incinerables	110	Gallons	ARD069748192	Clean Harbors, El Dorado, AR	NONE
CCRCK-ACID	Corrosive Incinerable Acids	766	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001 , D002 , D006 , D007 , D008
CCRK-AIR.	Solids For Incineration	270	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001 , D002
CCRK-inter	Solids For Incineration	6,461	Pounds	TXD055141378	Clean Harbors, La Porte, TX	CR05 , D018 , OUTS409H
CCRK-INTER-NH.	Solids For Incineration	735	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	NONE
CCRKNA3077B	Solids For Incineration	63	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D006 , F003 , F005
CCRN-INTER	Non Hazardous Material for Waste To Energy Incineration	1,174	Pounds	OHD000816629	Clean Harbors, Cincinnatti, OH	CR05
CCSMNA3077MB	Debris For Microencapsulation	27,285	Tons	MIR000035204	Clean Harbors Corunna, ON	D006 , D007 , D008
CFL1-INTER-HAZ	Mercury Bulbs For Reclamation	928	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D009
CFL1-INTER-NH	Mercury Bulbs For Reclamation	88	Pounds	OHD000816629	Clean Harbors, Cincinnatti, OH	NONE
CFL2-INTER	Misc. Mercury Bulbs For Reclaim	50	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	NONE
CFL4-INTER-NH	Misc. Mercury Bulbs For Reclaim	60	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	NONE
CFL5-INTER-HAZ	Low Pressure Sodium Lamps For Reclaim	11	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D009
CHG4-inter	Mercury Salts And Solutions for Retort	60	Gallons	ARD069748192	Clean Harbors, El Dorado, AR	D002 , D007 , D009 , D011
CHSI-INTER	PCB Solids For Incineration	876	Pounds	TXD055141378	Clean Harbors, La Porte, TX	CR01 , OUTS3011
CHSI-WET	PCB Solids For Incineration	188	Kilograms	TXD055141378	Clean Harbors, La Porte, TX	D001 , D027 , OUTS409H
CNO-INTER	Non Hazardous Solid	9	Tons	OHD000816629	Clean Harbors, Cincinnatti, OH	CR05
COF-INTER	Oil Filters For Reclamation	11,896	Pounds	RID084802842	Safety Kleen Cranston, RI	NONE
D92K-INTER	Higher Toxicity Solids For Incineration	3,939	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D016
DE-ASBTAR	Higher Hazard Solids/Sludges For Direct Burn (Kiln Ready)	10	Gallons	TXD055141378	Clean Harbors, La Porte, TX	OUTS6061
E124002EPA	F-Listed For Stabilization	10	Tons	PAD010154045	Envirite of Pennsylvania, York, PA	F006
EEE5-INTER	Freon Containing Articles For Reclamation	1,010	Pounds	NCD000648451	Clean Harbors, Reidsville, NC	CR05
EEE5-UNIVERSAL	Freon Containing Articles For Reclamation	75	Pounds	NCD000648451	Clean Harbors, Reidsville, NC	NONE
EEE-inter	Equipment For Dismantling	597	Cubic Yards	NCD000648451	Clean Harbors, Reidsville, NC	CR05
FB1-INTER	Liquid For Fuel	85	Gallons	OHD000816629	Clean Harbors, Cincinnatti, OH	D001 , D018
FB1-INTER-NH	Liquid For Fuel	392	Gallons	OHD000816629	Clean Harbors, Cincinnatti, OH	NONE
FB2-INTER	Liquid Fuel With Solids	10	Gallons	KYD053348108	Safety-Kleen, Lexington, KY	D001 , F003
FB2-INTER-NH	Liquid Fuel With Solids	37	Pounds	KYD053348108	Safety-Kleen, Lexington, KY	NONE

Outbound Wastes January - September 2014						
Profile	Waste Description	Qty		Destination EPA ID#	Destination Loacation	Waste Code(s)
FB4-INTER-NH	Organic Solid For Fuel	15	Gallons	TXD055141378	Clean Harbors, La Porte, TX	OUTS4091
FB5-inter	Solid Fuel Not Process-able (Debris)	6,434	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D005 , D007 , D036 , F003 , F004
GDB-LOOSEPACK	Labpack Latex Paint For Recycling	1,380,333	Pounds	ILR00015968	GDB International Nashville, IL	CR04
IDN-DEBRIS	Debris For Microencapsulation	41	Tons	MIR000035204	Clean Harbors Corunna, ON	D006 , D007 , D008
KTXC-969	Lead Acid Batteries For Reclamation	89	Pounds	OHR000038513	TOXCO Baltimore, OH	NONE
LAC2D	Semi-Solids For Stabilization	330	Gallons	OKD065438376	Clean Harbors, Waynoka, OK	D002 , D004 , D006 , D007 , D008
LB2D	Semi-Solids For Stabilization	165	Gallons	OKD065438376	Clean Harbors, Waynoka, OK	D009
LB2DF	Semi-Solids For Stabilization	1,422	Pounds	OKD065438376	Clean Harbors, Waynoka, OK	D006 , D007 , D008 , D011
LB-WC-F039FCB	Organic Contaminated Solids for Thermal Desorption	72	Tons	MIR000035204	Clean Harbors Corunna, ON	F006
LCCRA-HAZ	Labpack Acid & Acid Compatibles For Incineration	334	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001 , D002 , D007
LCCRB-HAZ	Labpack Basic & Basic Compatibles For Incineration	10	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001
LCCRQ-INTER	Aerosols For Incineration	135	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001
LLF-INTER	Labpack For Landfill	180	Pounds	OHD000816629	Clean Harbors, Cincinnatti, OH	NONE
LND	Semi-Solids For Stabilization	326	Pounds	OKD065438376	Clean Harbors, Waynoka, OK	D005, D006, D007, D008, D010
LNH	Non Hazardous Semi-Solids	55	Gallons	OKD065438376	Clean Harbors, Waynoka, OK	NONE
LPTN-INTER	Non-Processable Paint & Paint Related Mtrl For Incineration	126,170	Pounds	ILD980613913	Safety-Kleen, Dolton II	D001
LPTN-INTER-NH	Non-Processable Paint & Paint Related Mtrl For Incineration	6,965	Pounds	ILD980613913	Safety-Kleen, Dolton II	NONE
LPTS-INTER	#N/A	139,484	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D001
LRCTB-HAZ	Labpack Reactive Basic & Basic Compatibles For Incineration	2,026	Pounds	ARD069748192	Clean Harbors, El Dorado, AR	D002 , D003
OILFILTER	Oil Filters For Reclamation	1,837	Gallons	MAD066588005	Murphy's Waste Oil Services, Inc., Woburn, MA	MA01
SANH	Solids To Hazardous Landfill	75	Pounds	MAD053452637	Clean Harbors, Braintree, MA	CR05 , MA99
SBND	Characteristic Solids/Semi Solids For Stabilization	5,897	Pounds	OKD065438376	Clean Harbors, Waynoka, OK	D005 , D006 , D007 , D008 , D010
SBNDF	F-Listed For Stabilization	5,313	Pounds	OKD065438376	Clean Harbors, Waynoka, OK	F006
SBNH	Solids To Hazardous Landfill	4,548	Pounds	OKD065438376	Clean Harbors, Waynoka, OK	NONE
USA-CRUSHED	Crushed Fluorescent Bulbs For Reclamation	69	Pounds	OHR000109819	US Lamp Cincinnatti OH	D009
WI101227	Crushed Fluorescent Bulbs For Reclamation	93	Pounds	WIR000000356	WM Mercury Waste Union Grove, WI	D009
WI756277	Mercury Salts And Solutions for Retort	65	Gallons	WIR000000356	WM Mercury Waste Union Grove, WI	D002 , D007 , D009
WI756321	Mercury Salts And Solutions for Retort	325	Gallons	WIR000000356	WM Mercury Waste Union Grove, WI	D002 , D007 , D009 , D011
WI756698	Mercury Batteries For Retort	5	Pounds	WIR000000356	WM Mercury Waste Union Grove, WI	D009

Hassler, Paul

From: Gore, Michelle
Sent: Tuesday, September 30, 2014 8:06 AM
To: Paulin, Nicole; Schiavone, Joseph
Cc: Barrett, Kevin; Hassler, Paul
Subject: RE: FA mail - Clean Harbors
Attachments: CLEAN HARBORS INSURANCE SEPT 24 2014.pdf; CLEAN HARBORS INS SEPT 29 2014.pdf

Hi Nicole,

I reviewed the attached – both submittals are acceptable.

The September 24 correspondence adequately responds to comments I had regarding Clean Harbors change in insurance companies from Steadfast to Indian Head on September 6, 2013.

The September 29 correspondence is Clean Harbors annual adjustment for inflation and renewal of the Indian Head policy.

I'm going to send a note to James Childress at Clean Harbors today letting him know they can cancel the Steadfast insurance policy.

Thanks,
Michelle

From: Paulin, Nicole
Sent: Monday, September 29, 2014 3:12 PM
To: Gore, Michelle; Schiavone, Joseph
Subject: FA mail - Clean Harbors

Hi Michelle, pls see the attached. I filed the orig in the 4th fl FA HW file. Pls let me know if it is acceptable or not.
Thank you,
Nicole