

**Office of Adjudications**

***IN THE MATTER OF*** : ***APPLICATION NO. 200802663***  
***HERITAGE-CRYSTAL CLEAN, LLC*** : ***February 14, 2013***

**FINAL DECISION**

On January 24, 2014, the Applicant and staff jointly filed the attached Agreed Draft Decision for my review and consideration. ([Appendix 1.](#)) Regs., Conn. State Agencies § 22a-3a-6(1)(3)(A). I have reviewed this submission, the record and the relevant law in this matter. I find that the application filed by Heritage-Crystal Clean for a waste facility permit (“Application”) complies with the applicable statutes and relevant provisions of the implementing regulations. Furthermore, I find that the parties’ Agreed Draft Decision, as supplemented herein, satisfactorily conveys the factual findings and legal conclusions necessary to support my decision. I adopt this Agreed Draft Decision as part of my Final Decision.<sup>1</sup>

The Applicant proposes to operate a new waste transfer facility, transferring hazardous waste collected from its customers from one vehicle to another at the proposed facility, in the manner contemplated by General Statutes § 22a-454(c). This facility requires permits issued pursuant to General Statutes §§ 22a-208a and 22a-454. As required by statute, “No permit shall be granted . . . unless the commissioner is satisfied that the activities of the permittee will not result in pollution, contamination, emergency or a violation of any regulation . . . .” General Statutes § 22a-454. If conducted as proposed and in accordance with the terms and conditions of the draft permit, the proposed regulated activities will not

---

<sup>1</sup> On February 7, 2014, The parties to this matter, Heritage-Crystal Clean, LLC (Applicant) and staff of the Department of Energy and Environmental Protection submitted a written waiver of the issuance of a proposed final decision. The Commissioner has delegated final decision-making authority to this Office and its hearing officers in certain circumstances including “matters where the parties, including staff of the Department, by written stipulation have agreed to waive the issuance of a proposed final decision, pursuant to [General Statutes] § 4-179(d).” Delegation of Authority, July 12, 2011, § VIII, F. 4. c. viii.

result in pollution, contamination, emergency or a violation of any regulations promulgated by the Department.

The DEEP has prepared a draft permit. ([Appendix 2.](#)) The record and this draft permit reflect staff's consideration of all the relevant criteria set forth in the applicable statutes and implementing regulations governing the proposed regulated activity. Operation of the proposed waste facility in the manner required by the Draft Permit would be consistent with all relevant statutes and regulations regulating the operation of this type of facility. I therefore recommend issuance of the Draft Permit.

## ***II***

### ***DECISION***

#### ***A***

##### ***FINDINGS OF FACT***

The following findings supplement the Findings of Fact contained in the Agreed Draft Decision.

1. The Applicant prepared and implemented an Environmental Equity Plan prior to submission of the Application. As a part of this plan, the Applicant held a pre-application public meeting. Notice of this pre-application meeting was posted on a sign on the property, published in the *Hartford Courant* and broadcast on WHCN 105.9 FM, a local radio station. No members of the public attended the pre-application meeting. Once the application was filed, notice was again published in the *Hartford Court* and mailed to the Mayor of the City of Hartford. A public meeting was also held after the application was filed. Notice of that meeting was posted on the property, published in the *Hartford Courant* and a Spanish language publication and broadcast on WHCN 105.9 FM. A public repository of all application materials was maintained at the Hartford Public Library. (Exs. DEEP 1-G, 3, 37, APP.-1.)

2. On November 15, 2011, the Applicant was granted a Special Permit by the City of Hartford Planning and Zoning Commission (Commission). (Ex. APP-1.)
3. As part of the Application, the Applicant submitted an employee training plan, inspection schedule and sample log, an emergency plan for addressing any spill of waste, and a closure plan. Many of these documents were revised as a result of staff's review of the Application. These documents, or revised versions of these documents, were incorporated into the Draft Permit. (Exs. DEEP 1, 1-K, 1-L, 1-N, 1-P, 39-M, 39-L, 39-J, 39-K.)
4. Certain employees at the proposed waste facility will be trained in "safety, hazard communications, hazardous materials and hazardous waste management, emergency response and personal protective equipment." This training is required of the branch manager, branch sales manager and sales representatives, all of whom are "responsible for waste management and could potentially have to respond to an emergency incident." (Ex. DEEP 39-M.)
5. The inspection schedule incorporated into the Draft Permit is rigorous. Daily inspections of the loading area, the waste containers and trailers loaded with waste containers are required. (Ex. DEEP 39-L.)
6. The emergency plan is comprehensive. The plan sets out clear steps for notifying emergency response personnel, including the fire department and this Department. The plan also specifically identifies a point person for coordination of emergency response and a chain of command. Emergency response equipment is required to be maintained on site, including a boom, absorbents and a containment pool for responding to spills of hazardous waste. (Ex. DEEP 39-J.)
7. Waste will be stored only in a specially designed tractor trailer that will remain at the site for no more than ten days. Because of these operating procedures, the closure plan calls for the site to be

completely closed, and free of waste or contamination, within 180 days after receiving its final load of waste. The closure plan calls for a thorough investigation of the site and details decontamination and disposal measures to be taken if necessary. (Ex. DEEP 39-K.)

***B***

***PUBLIC COMMENT***

1. A public hearing on the Application was conducted in Hartford on December 5, 2014. Written comments were accepted at the public hearing and by mail or e-mail until December 11, 2014.<sup>2</sup> Eleven speakers, including State Representative Edwin Vargas and representatives of the Connecticut Coalition for Environmental Justice (Petitioner), offered comment.
2. Much of the public comment focused on the proximity of the proposed facility to other waste disposal facilities located in Hartford, including the Connecticut Resource Recovery Authority's trash incinerator, located nearby. For example, in both his oral and written comments, Sherman Bowens, commented that "[H]artford is already carrying an unfair burden of waste facilities of all types, such as the sewage treatment plant, the garbage burning incinerator, the sewage sludge incinerator, two of the largest recycling centers in the state, and the two North Meadows landfills (one trash and one ash from the incinerator)."
3. Mr. Bowen's concern was shared by other speakers, including Shayne Fields, who commented in person and in writing that, "[b]y agreeing to let the Heritage-Crystal Clean open this transfer facility, we are agreeing that Hartford is a place where anyone can stop by and drop their trash . . . ." The comments made by Mr. Bowen and Mr. Fields were generally representative of those made by other speakers.

---

<sup>2</sup> These written comments, and a recording of the Public Hearing, referenced in this section, are a part of the administrative record and are available for inspection by contacting the Office of Adjudications.

4. Joe Wasserman, an organizer employed by the Petitioner, questioned whether, “Hartford [must] continue to host more and more of these undesirable facilities?” He further commented that “[t]he decision by the Hartford Planning and Zoning Commission to approve the permit by Heritage [C]rystal Clean was taken in a highly undemocratic and manipulative manner. Our organization was not informed about what was occurring during the period of the open hearing and only got word of this as the open portion of the hearing was being concluded. This is highly irregular in that CCEJ had been very engaged in this permit request over a number of years. . . We believe that if the Planning and Zoning Commission had access [to information submitted during the public hearing on the Application] the decision may have been different.”
5. During the evidentiary hearing on December 6, 2013, witnesses testifying on behalf of the Applicant and Department staff were asked whether the statutory and regulatory criteria used to evaluate the Application included an evaluation of the location of the proposed facility and its proximity to other waste facilities. Gabrielle Frigon, testifying on behalf of Department Staff, indicated that the permit sought from the Department is only one aspect of the oversight of the proposed facility. She testified that, while the Department considers buffering of the site from surrounding business, there are no specific statutory or regulatory requirements that address proximity to other waste facilities in the area where the facility is being proposed. (Test., G. Frigon, 12/6/13.)

*C*

***CONCLUSIONS OF LAW***

*1*

***STATUTORY AND REGULATORY CRITERIA***

If operated as required by the Draft Permit, the substantial evidence in the record indicates that the proposed waste transfer facility will not result in pollution, contamination or emergency. The rigorous inspection program will ensure that any release of hazardous material is quickly identified by the Applicant's trained employees. The design of the proposed facility and the emergency plan proposed by the Applicant will prevent hazardous waste from causing pollution or contamination in the unlikely event that a release does occur. The proposed emergency plan provides clear management and decision making structures to quickly address and limit the impacts of any release. The investigation, decontamination and disposal measures called for in the closure plan will prevent any pollution or contamination from remaining on the site if the Applicant closes or relocates its operation.

Additional discussion of statutory and regulatory criteria reviewed by staff and satisfied by the Applicant is contained in the Agreed Draft Decision. I adopt the conclusions reached in the Agreed Draft Decision as supplemented herein. I find that the substantial evidence in the record demonstrates compliance with all criteria contained in relevant statutes and regulations.

*2*

***DEPARTMENT AND LOCAL JURISDICTION***

An analysis of the jurisdiction of the Department to regulate the location of waste transfer facilities such as the proposed facility is necessary as it was the primary concern raised by the Petitioner and many speakers offering comment. This analysis is grounded in the law of preemption, which, as it relates to waste

facilities is well settled. The legislature, by enacting General Statutes §§ 22a-208a and 22a-454, demonstrated its intent that the Department regulate certain aspects of waste disposal facilities. However, other aspects of the regulations of waste facilities are reserved to municipalities. A municipal zoning commission may,

regulate . . . the location and use of buildings, structures and land for trade, industry, residence or other purposes . . . [Regulations] may provide that certain classes or kinds of buildings, structures or use or uses of land are permitted only after obtaining a special permit or special exception . . . subject to standards set forth in the regulations and to conditions necessary to protect the public health, safety, convenience and property values.

General Statutes § 8-2. Nothing in §§ 22a-208a or 22a-454 preempts municipal authority to regulate the use of land as a waste disposal facility.

[A] local ordinance is preempted by a state statute whenever the legislature has demonstrated an intent to occupy the entire field of regulation on the matter . . . or . . . whenever the local ordinance irreconcilably conflicts with the statute. . . . Whether an ordinance conflicts with a statute or statutes can only be determined by reviewing the policy and purposes behind the statute and measuring the degree to which the ordinance frustrates the achievement of the state's objectives. . . . (Citations omitted.)" (Internal quotation marks omitted.) *Helicopter Associates, Inc. v. Stamford*, 201 Conn. 700, 705, 519 A.2d 49 (1986); *Shelton v. Commissioner of Environmental Protection*, 193 Conn. 506, 517, 479 A.2d 208 (1984); *Dwyer v. Farrell*, 193 Conn. 7, 12-14, 475 A.2d 257 (1984).

*Bauer v. Waste Mgmt.*, 234 Conn. 221, 232 (Conn. 1995). Our Supreme Court has held that "legislature did not intend to 'occupy the entire field of regulation' with regard to solid waste facilities" when it enacted § 22a-208a. *Id.* In fact, the legislature specifically reserved certain rights to municipal zoning commissions.

In *Bauer*, our Supreme Court found this reservation of authority in

[General Statutes § 22a-208a]subsection (b): '*Nothing in this chapter or chapter 446e shall be construed to limit the right of any local governing body to regulate, through zoning, land usage for solid waste disposal.*' . . . we read the provision of § 22a-208a(b), in accordance with its language, to apply to all the provisions of the chapter and to mean that the zoning authority of a town may be brought to bear on solid waste

facilities located within its borders. This is not to suggest that regulation beyond permissible zoning authority would not be preempted by the solid waste management chapter of the general statutes; nor is it to suggest that land use regulation through zoning that is in conflict with state statutes and regulations is permissible.

(Internal citations omitted.) *Id.* at 234-235<sup>3</sup>.

Consideration of the location of the proposed waste facility and its proximity to other waste facilities is within the “permissible zoning authority” of the City of Hartford, as set out in General Statutes § 8-2, when considering whether to grant the Applicant a Special Permit. The requirement to obtain a permit from this Department preempts neither the applicable zoning regulations nor the Commission’s exercise of its delegated discretion.

While General Statutes Chapter 446k does not contain a similar reservation of rights, a close reading of § 22a-454 reveals no indication that the legislature intended to “occupy the field” of regulation of hazardous waste facilities. For that reason, the analysis above is not impacted by the need to obtain permits under both §§ 22a-208a and 22a-454 for the proposed facility.

Representatives of the Petitioner and other speakers at the public hearing urged rejection of the Application due to its proximity to other waste facilities. While their concerns are both important and legitimate, they are not properly raised in this administrative forum. Essentially, speakers urged the Department to reject the Application because they felt it was an improper use of the land upon which the proposed facility is located. While the Department and the Commission have concurrent jurisdiction over the proposed facility, that jurisdiction is not overlapping on this point. The use of land is properly regulated

---

<sup>3</sup> Section 22a-208a(b), referred to in the quotation, was subsequently moved to § 22a-208b(b). The section currently states, “[n]othing in this chapter or chapter 446e shall be construed to limit the right of a municipality to regulate, through zoning, land usage for an existing or new solid waste facility.” This slightly modified language does not impact the conclusion of the Court in *Bauer*. This current language of § 22a-208 was adopted during the General Assembly’s 2012 session, as a response to the Superior Court’s decision in *Recycling Inc. v. City of Milford*, 2010 Conn. Super. LEXIS 2862 (The court engaged in statutory interpretation as well as use of the plain meaning rule in determining that the exception in Conn. Gen. Stat. § 22a-208b for local regulatory authority existed only in limited circumstances, in all respects, the State had preempted the field).



by the Commission, and the Commission alone. The Department may not preempt regulation of the proposed facility by the local zoning commission. If I were to reject the Application on the basis of the use of land, I would disturb the decision of the Commission on criteria over which its jurisdiction has been explicitly reserved. To the extent the Petitioner or others claim that the decision of the Commission is somehow invalid or improper, I note that those claims are not properly raised in this forum.

Because I cannot revisit the decision of the Commission, I will instead review the Application based only on the criteria within the jurisdiction of the Department.

3

### ***UNCONTRADICTED EXPERT TESTIMONY***

The Agreed Draft Decision concludes that the Application satisfies the criteria contained in General Statutes §§ 22a-208a and 22a-454. That conclusion is supported by written and oral testimony of witnesses for the Department and the Applicant. Lauren Jones, who holds a Bachelors of Science in civil engineering and is a Sanitary Engineer in the Waste Engineering and Enforcement Division of the Bureau of Materials Management and Compliance Assurance, and Gabrielle Frigon, a supervising Environmental Analyst in the same bureau, submitted written and oral testimony on behalf of DEEP Staff. Ms. Jones and Ms. Frigon testified that the Application and the Draft Permit comply with the relevant statutory and regulatory scheme, as set out in the Agreed Draft Decision. See *Connecticut Building and Wrecking Co. v. Carothers*, 218 Conn. 580, 593 (1991)(“An agency composed of [experts] is entitled . . . to rely on its own expertise.”)

Catherine McCord, the Applicant’s Vice President for Environment, Health and Safety, and a former employee of the United States Environmental Protection Agency and the Ohio Environmental Protection Agency offered written and oral testimony. Her testimony was supplemented by additional written testimony from Kathleen Homer, an environmental consultant with 38 years experience. Ms. McCord and

Ms. Homer's testimony summarizes the proposed operation of the facility and the Applicant's history of compliance with permits in other jurisdictions. It was their testimony that the proposed facility complied with all statutory and regulatory criteria.

I rely upon the testimony of Ms. Jones, Ms. Frigon, Ms. McCord and Ms. Homer as expert testimony, which was uncontradicted. "An administrative agency is not required to believe any of the witnesses, including expert witnesses... but it must not disregard the only expert evidence available on the issue . . . ." *Bain v. Inland Wetlands Commission*, 78 Conn. App. 808, 817 (2003). "The trier of fact is not required to believe un rebutted expert testimony, but may believe all, part or none of such un rebutted expert evidence." *Bancroft v. Commissioner of Motor Vehicles*, 48 Conn. App. 391, 405 (1998). In this instance, I find the uncontradicted expert testimony of Ms. Jones, Ms. Frigon, Ms. McCord and Ms. Homer to be credible and reliable.

I further find that the testimony of Ms. Jones, Ms. Frigon, Ms. McCord and Ms. Homer constitutes substantial evidence that the Applications and the draft permit prepared by staff comply with the statutory and regulatory criteria governing the proposed activities.

The substantial evidence rule governs judicial review of administrative fact finding. . . . An administrative finding is supported by 'substantial evidence' if the record affords a substantial basis of fact from which the fact in issue can be reasonably inferred. . . . In determining whether an administrative finding is supported by substantial evidence, a court must defer to the agency's assessment of the credibility of the witnesses and to the agency's right to believe or disbelieve the evidence presented by any witness, even an expert, in whole or in part. . . .

(Citations omitted; internal quotation marks omitted.) *Connecticut Bldg. Wrecking Co.*, *supra*, 218 Conn. at 593 (Conn. 1991). The expert testimony of Ms. Jones, Ms. Frigon, Ms. McCord and Ms. Homer affords a substantial basis of fact from which I can and do determine compliance. For this reason, in addition to those reasons stated above and in the Agreed Draft Decision, I recommend approval of the Application.

*III*

*CONCLUSION*

The Application satisfies the relevant statutory and regulatory criteria that guide the Commissioner's decision to grant the requested permit. This conclusion is supported by substantial evidence in the record, including the testimony of Ms. Jones, Ms. Frigon, Ms. McCord and Ms. Homer, as well as other evidence as set out in the Agreed Draft Decision.

I recommend that the requested permit, incorporating the terms and conditions set forth in the Draft Permit ([Appendix 2](#)), be issued.



---

Brendan Schain, Hearing Officer

*S E R V I C E   L I S T*

Heritage Crystal Clean, LLC – Commercial Hazardous Waste Facility Permit

PARTY

REPRESENTED BY

The Applicant

Heritage-Crystal Clean  
2175 Point Blvd., Suite 375  
Elgin, IL 60123

Mark Zimmermann  
Updike, Kelly & Spellacy  
100 Pearl St.  
Hartford, CT 06123  
(860) 548-2624  
[mzimmermann@uks.com](mailto:mzimmermann@uks.com)

Department of Energy and Environmental Protection

Bureau of Materials Management and  
Compliance Assurance  
Engineering and Enforcement Division  
79 Elm Street  
Hartford, CT 06106

Gabrielle Frigon  
[Gabrielle.Frigon@ct.gov](mailto:Gabrielle.Frigon@ct.gov)

COURTESY COPIES

Connecticut Commission on Environmental  
Justice

Joe Wasserman  
[Joe.Wasserman@environmental-justice.org](mailto:Joe.Wasserman@environmental-justice.org)  
Martha Kelly  
[Martha\\_s\\_kelly@yahoo.com](mailto:Martha_s_kelly@yahoo.com)



79 Elm Street • Hartford, CT 06106-5127

[www.ct.gov/deep](http://www.ct.gov/deep)

Affirmative Action/Equal Opportunity Employer

IN THE MATTER OF : APPLICATION NO. 200802663  
: TO CONSTRUCT AND  
: OPERATE A COMMERCIAL  
: HAZARDOUS WASTE TRANSFER  
HERITAGE-CRYSTALCLEAN, LLC : FACILITY  
94 MURPHY ROAD :  
CITY OF HARTFORD : JANUARY 24, 2014

**PARTIES' JOINT PROPOSED FINAL DECISION**

Together with Heritage-Crystal Clean, LLC, staff of the Department of Energy and Environmental Protection Bureau of Materials Management and Compliance Assurance (the “Department”) provides the following:

**BACKGROUND**

On November 14, 2008, Heritage-Crystal Clean, LLC (the “Applicant” or “HCC”) submitted an application for a C.G.S. Section 22a-454 Waste Facility Permit (Application No. 200802663, “the Application”). The Application seeks authorization to conduct truck-to-truck transfer of hazardous and non-hazardous waste, while storing such wastes at the facility for periods not to exceed ten (10) days. The Application is for a permit to construct and operate a commercial hazardous waste transfer facility in accordance with C.G.S. Sections 22a-6, 22a-208(a) and 22a-454 to be located at 94 Murphy Road, Hartford, Connecticut (hereinafter referred to as the “Site” or the “proposed facility”)(DEEP-1)(Lauren Jones p. 3; Catherine McCord p. 3).<sup>1</sup>

Reviews for both the sufficiency and the technical merits of the Application were conducted by the Department in accordance with all applicable standard procedures and the

---

<sup>1</sup> References to the pre-filed testimony of the witnesses will be to the name of the person who provided the testimony, followed by the appropriate page number of the pre-filed testimony. For example (McCord p. 3) refers to the third page of Catherine McCord’s pre-filed testimony. References to verbal testimony of witnesses will be designated by the person’s last name followed by the word “verbal”.

parties engaged in an iterative process for the clarification of information submitted as part of that Application, as well as additional information which was requested by the Department as part of those reviews. Subsequent to the submission and evaluation of information provided by the Applicant, the Department drafted a permit based on the Application, as amended by the Applicant's subsequent submissions. The draft permit authorizes the activities sought by the Applicant for the wastes itemized in the Application, tempered by those limitations and restrictions the Department deems necessary to protect human health and the environment.

On August 9, 2013, the Department, in accordance with C.G.S. Section 22a-6h, public noticed the tentative determination to approve the Application and issue a permit for the activities sought, which triggered the thirty (30) day public comment period. On September 11, 2013 the Applicant provided formal comment on the draft permit. Also on September 11, 2013, Connecticut Coalition for Environmental Justice (CCEJ), submitted a petition regarding the draft permit thereby triggering a public hearing.

On December 5, 2013 a public hearing was held. The public hearing was conducted by the Department's Office of Adjudications and present at the public hearing was staff of the Department's Bureau of Materials Management and Compliance Assurance, the Applicant, and various members of the public many of whom offered comments verbally and/or in writing. On December 6, 2013 an evidentiary hearing was held. The evidentiary hearing was conducted by the Department's Office of Adjudications and present at the evidentiary hearing was staff of the Department's Bureau of Materials Management and Compliance Assurance, the Applicant, two interested individuals entered the hearing room mid-way through the proceedings. The Applicant and the Department provided written testimony in advance and supplemented the record at the December 6, 2013 hearing. The formal record was closed on December 11, 2013

and no additional formal comments were received beyond those which had already been submitted both orally on December 5, 2013 and in writing.

### **FINDINGS OF FACT**

1. On November 14, 2008, the Applicant submitted an application for a C.G.S. Section 22a-454 Waste Facility Permit Application No. 200802663, for a permit to construct and operate a commercial hazardous waste transfer facility pursuant to C.G.S. Sections 22a-6, 22a-208(a) and 22a-454 at the Site (DEEP-1)(Lauren Jones p. 3; Catherine McCord p. 3).
2. The Application sought approval from DEEP for the truck-to-truck transfer of hazardous and non-hazardous wastes from one transportation vehicle to another transportation vehicle for less than 10-day storage, pursuant to RSCA Sections 22a-449(c)-100 through 119. (DEEP-1; McCord p. 3). The Application was filed on the forms prescribed by the Department, with all required attachments, including but not limited to a written closure plan (DEEP-1Q) as subsequently revised (DEEP- 9H14G20A 20E) and the applicable filing fee. (DEEP1).
3. On January 30, 2009, the Applicant arranged for a Public Notice to be published in the Hartford Courant, providing notice of the filing of its permit application. On February 4, 2009, the Applicant also provided written notice, pursuant to C.G.S. Section 22a-6g, of the permit application to Mayor Eddie Perez, City of Hartford, Connecticut. (DEEP-3).
4. The Applicant prepared and implemented an Environmental Equity Plan (DEEP-1G).
5. The Application contains details of all the information required by applicable statutes and regulations, including the following issues:

-The name and address of the owner/operator of the proposed facility (DEEP-1A, 1B, 1C);

- The names and addresses of all parent and subsidiary entities (DEEP-1C);
- The names and addresses of all partners, corporate officers and directors (DEEP-1C);
- A list of all solid waste facilities which each of the above persons are or have been associated with and their positions and responsibilities (DEEP-1C);
- The proposed facility location (DEEP-1A);
- A description of the facility and the proposed activities (DEEP-1A, 1B, 1J, 1K, 9D, 33);
- Information as to the Applicant's financial stability (DEEP-1H);
- A copy of the lease for use of the proposed facility (DEEP-1H);
- Detail regarding the Applicant's compliance history (DEEP-1D);
- A list of supporting materials (DEEP-1);
- A proposed facility plan, including engineering studies and plans prepared by a Connecticut licensed engineer (DEEP-1I, 1J, 9B, 9C, 14B, 16);
- Drawings and specifications of site structures (DEEP-1I, 1J, 9B, 9C, 14B, 16);
- Identification of the fixed and transport equipment at the proposed facility (DEEP-1I, 1J, 9B, 9C, 14B, 14C);
- Descriptions of the waste storage and handling methods at the proposed facility, including details of the facility's Waste Analysis Plan (DEEP-1I, 1J, 1K, 9B, 9C, 9D, 12, 14B, 14C, 14D, 15, 20, 20A, 21, 23, 24, 26, 28);
- Depictions of the utility provisions that will exist at the proposed facility (DEEP-1I, 1M, 9B, 9C, 14B);
- Identification of the Applicant's recycling facilities located in Pennsylvania, Indiana, Louisiana and Georgia, that will ultimately receive the wastes from the proposed facility (DEEP-1B, 1I, 9B, 14B);
- A contingency plan for periods of shutdown or breakdown (DEEP-1J, 1L, 9B, 9C, 9E, 9F, 14C, 14D, 14E, 20, 20A, 20B, 20C, 26);
- The proposed facility's operation and maintenance procedures were addressed (DEEP-1I, 1L, 9B, 9C, 9E, 9F, 14C, 14D, 14E, 20, 20A, 20B, 20C, 26);
- A discussion of OSHA related issues (DEEP-1J, 1M, 1P, 1Q, 9B, 9C, 9H, 14C, 14G);



- A site security plan (DEEP-1M, 14F);
- The personnel training records and requirements (DEEP-1N, 9G, 20, 20D, 26); and
- A description of the operating records that will be maintained at the proposed facility (DEEP- 1P, 26).

6. On March 16, 2009, DEEP issued a Notice of Sufficiency with respect to the Applicant's permit application. (DEEP-4; Jones p. 1).
7. On December 27, 2011, the City of Hartford Planning & Zoning Commission approved the Applicant's request for a special permit to operate a hazardous waste transfer facility at the Site. (DEEP-7; McCord p. 2, 3; Jones p. 2).
8. On April 4, 2012, DEEP sent the Applicant its initial Request for Additional Information ("RFAI"), seeking clarifications and additional information with respect to the application. (DEEP-8; Jones p. 4, 5).
9. Between April 4, 2012 and January 28, 2013, the parties engaged in an exchange of information and requests for clarifications and additional information in response to DEEP's initial RFAI and in response to further DEEP questions and requests for information. (DEEP-9 through 16; McCord p. 2; Jones p. 5, 6; Gabrielle Frigon p. 13).
10. On April 18, 2013, DEEP provided Applicant with draft versions of Sections 1 and 2 of the proposed permit for Applicant's review and comment. (DEEP-17; Jones p. 10).
11. Between April 18, 2013 and June 17, 2013, Applicant provided additional clarification and information in response to DEEP requests for clarification and additional information, with respect to the drafts of Sections 1 and 2 of the draft permit. (DEEP-17 through 25; Jones p. 6-10; Frigon p. 13).

12. On June 3, 2013, DEEP provided Applicant with drafts versions of Sections 3 and 4 of the proposed permit for review and comment. (DEEP-25; Jones p. 6-10).
13. Between June 3, 2013 and August 7, 2013, the Applicant provided additional clarification and information in response to the Department's requests for clarification and additional information, with respect to the drafts of Section 1, 2, 3 and 4 of the draft permit. (DEEP-25 through 29; Jones p. 6-10; Frigon p. 13).
14. Upon completion of its review of Applicant's initial permit application and supplemental information, DEEP issued a Permit Review Summary Sheet and its associated Fact Sheet, summarizing the proposed activity and concluding that DEEP had no concerns. (DEEP-30, 31; Jones p. 10).
15. DEEP's Notice of Tentative Determination, along with associated cover letters to the Applicant and the City of Hartford, was issued on August 9, 2013. (DEEP-31; Jones p. 11; Frigon p. 14).
16. Public Notice of DEEP's Notice of Tentative Determination was published in the August 13, 2013 Hartford Courant (DEEP-35), referencing the proposed draft permit. (DEEP-32; Jones p. 11).
17. On September 11, 2013, the Applicant submitted some clarification comments and suggested revisions to the proposed draft permit. (DEEP-33; Jones p. 11; Frigon p. 14).
18. Subsequent to the receipt of HCC's comments (DEEP-33), DEEP issued a proposed final draft permit. (DEEP-39; Frigon p. 14).

## **CONCLUSIONS OF LAW**

1. Was Application No. 200802663 developed and submitted in accordance with Connecticut General Statutes (CGS) Sections 22a-6, 22a-6g, 22a-208a, 22a-454 as well as Regulations of Connecticut State Agencies (RCSA) Sections 22a-209- 1 et seq., and 22a-3a-5?

On November 14, 2008, HCC submitted an application for a C.G.S. Section 22a-454 Waste Facility Permit (Application No. 200802663, “the Application”), for a permit to construct and operate a commercial hazardous waste transfer facility in accordance with C.G.S. Sections 22a-6, 22a-208(a) and 22a-454 to be located at 94 Murphy Road, Hartford, Connecticut (hereinafter referred to as the “Site”)(DEEP-1)(Lauren Jones p. 3; Catherine McCord p. 3).

The Application seeks approval from the Department to conduct truck-to-truck transfer of hazardous and non-hazardous wastes from one transportation vehicle to another transportation vehicle with less than 10-day storage, pursuant to RSCA Sections 22a-449(c)-100 through 119 and CGS Section 22a-448. (DEEP-1; McCord p. 3). The Application was filed on forms provided by the Department, with all required attachments, including but not limited to a written closure plan (DEEP-1Q) and the appropriate application fee (DEEP-1). Though not a requirement at the time, an Environmental Equity Plan (DEEP-1G), was prepared and implemented by the Applicant.

On January 30, 2009, the Applicant arranged for a Public Notice to be published in the Hartford Courant, providing notice of the filing of its permit application. On February 4, 2009, the Applicant also provided written notice, pursuant to C.G.S. Section 22a-6g, of the permit application to Mayor Eddie Perez, City of Hartford, Connecticut in response to the Notice of Insufficiency issued on January 20, 2009 (DEEP-3).

The Application addresses all of the applicable statutory and regulatory requirements, providing detailed information pertaining to the ownership and control of Applicant and affiliated companies, the Applicant's involvement with other solid waste facilities, business information as well as other related information. The Application also provides details pertaining to the authorizations sought for both activities and wastes proposed for management at the proposed facility, and the facility plan which incorporates the operation and management plan and the engineered site drawings. On March 16, 2009, the Department issued a Notice of Sufficiency with respect to the Application. (DEEP-4; Jones p. 1).

On December 27, 2011, the City of Hartford Planning & Zoning Commission approved the Applicant's application for a special permit to operate a hazardous waste transfer facility at the Site. (DEEP-7; McCord p. 2, 3; Jones p. 2).

On April 4, 2012, the Department issued a Request for Additional Information ("RFAI"), seeking clarifications and additional information with respect to the Application. (DEEP-8; Jones p. 4, 5). Between April 4, 2012 and January 28, 2013, the parties engaged in an exchange of information and requests for clarifications and additional information in response to the Department's initial RFAI and in response to further questions and requests for information from the Department. (DEEP- 9 through DEEP-16; McCord p. 2; Jones p. 5, 6; Gabrielle Frigon p. 13).

On April 18, 2013, the Department provided the Applicant with draft versions of Sections 1 and 2 of the proposed draft permit for the Applicant's review and comment. (DEEP-17; Jones p. 10). Between April 18, 2013 and June 17, 2013, the Applicant provided additional clarification and information in response to the Department's requests for clarification and

additional information, with respect to the drafts of Sections 1 and 2 of the draft permit. (DEEP-18 through DEEP-24; Jones p. 6-10; Frigon p. 13).

On June 3, 2013, the Department provided the Applicant with draft versions of Sections 3 and 4 of the proposed draft permit for the Applicant's review and comment. (DEEP-25; Jones p. 6-10). Between June 3, 2013 and August 7, 2013, the Applicant provided comments with respect to the drafts of Section 1, 2, 3 and 4 of the draft permit. (DEEP- 26 through DEEP-29; Jones p. 6-10; Frigon p. 13).

The Department drafted the notice of tentative determination (NTD) to approve the Application along with associated fact sheet, permit review summary (DEEP-30) and cover letters to the Applicant and the City of Hartford. The NTD was published on August 9, 2013. (DEEP-31; Jones p. 11; Frigon p. 14). On September 11, 2013, the Applicant submitted comments to provide clarification and suggested revisions to the draft permit. (DEEP-33; Jones p. 11; Frigon p. 14).

2. Was the proposed Bureau of Materials Management and Compliance Assurance CGS Section 22a-454 Waste Facility Permit, developed in response to Application No. 200802663, drafted in accordance with RCSA sections 22a-209-1 et seq., 22a-3a-5 and applicable Department policy?

Ms. Jones conducted a review of Application No. 200802663 to evaluate the technical merits of that application. She determined that certain information that had been presented in the application package required clarification or correction.

Specifically, Ms. Jones evaluated the content of the application form (DEEP -1A) for accuracy, consistency and completeness. That evaluation incorporated a comparison of the information submitted to published databases and established reference materials, as well as the

information submitted in the form of documents in support of the application (DEEP-1B through DEEP-1R).

Following her initial evaluation of the application package (DEEP-1A through DEEP-1R) Ms. Jones developed questions that required answers and identified clarifications necessary to allow the application process to continue (DEEP-8). Ms. Jones continued to evaluate the information that was submitted by Applicant (DEEP-9) in response to DEEP-11 within the context of the application package. The process of requesting additional information by the Department and receiving responses from the Applicant was repeated several times over the course of processing the subject application (DEEP-10 through DEEP-16, and DEEP-19 through DEEP-24). Based on her review of the subject application and multiple discussions with the Applicant, Ms. Jones developed Sections 1 and 2 of a draft permit to construct and operate that reflected the requested regulated activities incorporating the waste types to be authorized for management at the proposed facility, with appropriate limitations and restrictions to adequately protect human health and the environment (DEEP- 17 and DEEP-22). A dialog was conducted between the Applicant and the Department regarding the draft sections (DEEP-18 and DEEP-22) concurrent with the development of Sections 3 and 4 of the draft permit (DEEP-25). The dialog continued between the Applicant and the Department regarding the draft permit (DEEP-26, 27 and 28). The draft permit (DEEP-32) that is the subject of the public notice regarding the Commissioner's tentative determination to approve Application No. 200802663 was finalized and subsequently public noticed on August 9, 2013.

During the public comment period the Applicant submitted formal comments pertaining to the draft permit (DEEP-33) which the Department noted and responded to by modifying the draft permit resulting in a proposed permit to construct and operate (DEEP-39).

Ms. Jones' review of the application package complied with the requirements set forth in the Regulations of Connecticut State Agencies Sec. 22a-209-1 et seq., as well as Section 22a-3a-5. Ms. Jones' development of the draft permit was consistent with those same regulations and with Department policy as it has been applied to similar facilities established within the State of Connecticut which are regulated by the Department. Ms. Jones' development of the draft permit included oversight and review by duly authorized Department supervisory and managerial staff.

### **CONCLUSION**

The Application, which is the subject of this matter (Application No. 200802663), was developed and submitted in accordance with CGS Sections 22a-6, 22a-6g, 22a-208a and 22a-454, as well as RCSA Sections 22a-209- 1 et seq. and 22a-3a-5. Additionally, the Application was evaluated for sufficiency and technical merit in accordance with those same Statutes and Regulations by the Department's technical staff.

The proposed permit identified as exhibit DEEP-39 has been drafted in accordance with RCSA Sections 22a-209-1 et seq. and 22a-3a-5.

In light of the testimony and exhibits provided, as well as the comments received and the responses to those comments, it is concluded that the proposed permit, presented as Exhibit DEEP-39, meets all applicable statutory and regulatory requirements of the Department and should be issued.

Respectfully submitted by:

/s/ Gabrielle Frigon

Gabrielle Frigon, Supervising Environmental Analysts/ Mark Zimmermann

Waste Engineering and Enforcement Division

Bureau of Materials Management

and Compliance Assurance

Mark Zimmermann, Esq.

Updike, Kelly & Spellacy

Representing Heritage-Crystal Clean, LLC

## **CERTIFICATION**

I hereby certify that a copy of the foregoing **Parties' Joint Proposed Final Decision** was delivered via electronic mail, this twenty-fourth day of January, 2014 to:

Hearing Officer Brendan Schain  
Office of Adjudications  
Department of Energy and Environmental  
Protection  
79 Elm Street  
Hartford, CT 06106-5127  
[brendan.schain@ct.gov](mailto:brendan.schain@ct.gov)

Lauren Jones  
Bureau of Materials  
Management and Compliance  
Assurance  
CT Dept. of Energy and  
Environmental Protection  
[lauren.jones@ct.gov](mailto:lauren.jones@ct.gov)

Robert Isner  
Bureau of Materials  
Management and Compliance  
Assurance  
CT Dept. of Energy and  
Environmental Protection  
[robert.isner@ct.gov](mailto:robert.isner@ct.gov)

Catherine McCord  
Heritage-Crystal Clean, LLC  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

Atty Mark Zimmermann  
Updike, Kelly & Spellacy  
[mzimmermann@uks.com](mailto:mzimmermann@uks.com)

/s/ Gabrielle Frigon  
Gabrielle Frigon  
Supervising Environmental Analyst  
Waste Engineering and Enforcement Division  
Bureau of Materials Management and  
Compliance Assurance



**DRAFT                      DRAFT                      DRAFT**  
**PERMIT TO OPERATE A COMMERCIAL HAZARDOUS WASTE  
TRANSFER FACILITY**

Pursuant to Chapters 439 and 446k of the Connecticut General Statutes (“CGS”), a Permit is issued to:

Permittee:

Heritage Crystal-Clean, LLC  
94 Murphy Road  
Hartford, CT 06114

Permit No.

To operate a commercial hazardous waste ten day transfer facility located at 94 Murphy Road, Hartford, CT in accordance with CGS Sections 22a-6, 22a-454 and 22a-449(c), and Section 22a-449(c)-110 of the Regulations of Connecticut State Agencies (“RCSA”) as specified in the conditions and attachments set forth herein.

This Permit regulates and authorizes the less than ten day day storage and transfer of wastes subject to the requirements of the Resource Conservation and Recovery Act (“RCRA hazardous”), non-RCRA hazardous and universal wastes received from off-site. The activities include: container storage, loading and unloading of non-bulk containers, and the truck-to-truck transfer of RCRA hazardous, non-RCRA hazardous and universal wastes incidental to transportation.

All terms in this Permit are defined in the Permit or if not defined in the Permit are defined in Section 22a-449(c)-100 of the RCSA or in Title 40 of the Code of Federal Regulations (“CFR”) Parts 260, 261, 262, 264, 268, 270 and 279.

This Permit is based on the information described in the CGS Section 22a-454 permit application (Application No. 200802663) submitted to the Department of Energy and Environmental Protection by the applicant on November 14, 2008, amended on June 4, 2013. The Permittee must keep records of all data used to complete the permit application and any supplemental information submitted for the effective term of the Permit. The permit application is hereby incorporated by reference as part of the Permit. Any false statement or inaccuracies contained in the information submitted by the Permittee may result in the suspension, revocation or modification of this Permit and civil or criminal enforcement action.

The Permittee shall comply with all terms and conditions of this Permit. This Permit consists of the conditions contained in the following: Section I-Standard Facility Conditions; Section II-Permitted Activities; Section III-Operating Conditions; Section IV-General Facility Conditions; Section V- Compliance Schedule; and Section VI-Attachments; and the information specified in the Permittee’s permit application, except where the application is superseded by the more stringent conditions contained herein. In addition, the Permit incorporates the following: Attachment A - Waste Analysis Plan; Attachment B - Contingency Plan; Attachment C -

**DRAFT**

**DRAFT**

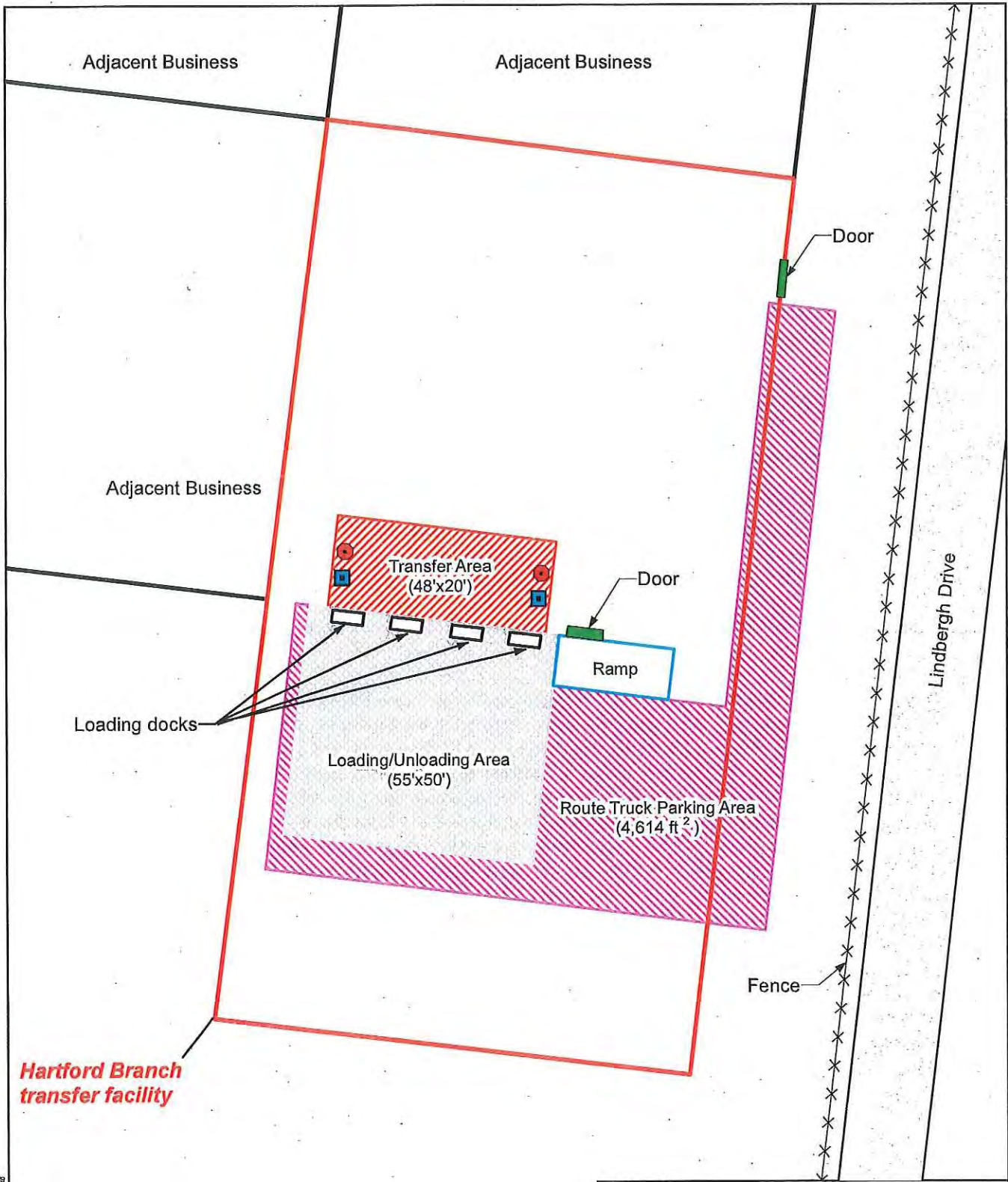
**DRAFT**

Inspection Plan; Attachment D – Training Plan; and Attachment E - Closure Plan. Any violation of any provision of this Permit may subject the Permittee to enforcement action pursuant to the CGS including but not limited to Sections 22a-6 and 22a-131.






This Permit may be revoked, suspended, modified, transferred or reissued, in order to comply with applicable law. The Commissioner may also modify this Permit when it is deemed necessary to do so. The Permittee shall submit a permit application to the Commissioner at least one hundred eighty (180) calendar days before making any changes to any of the permitted areas or activities. Any application shall be approved in writing by the Commissioner prior to the Permittee implementing such changes.

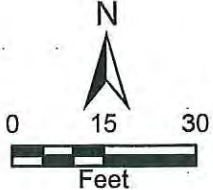
This Permit shall become effective on \_\_\_\_\_, 2013 and shall expire five (5) years from this effective date.

\_\_\_\_\_  
Macky McCleary, Deputy Commissioner  
Department of Energy and Environmental  
Protection



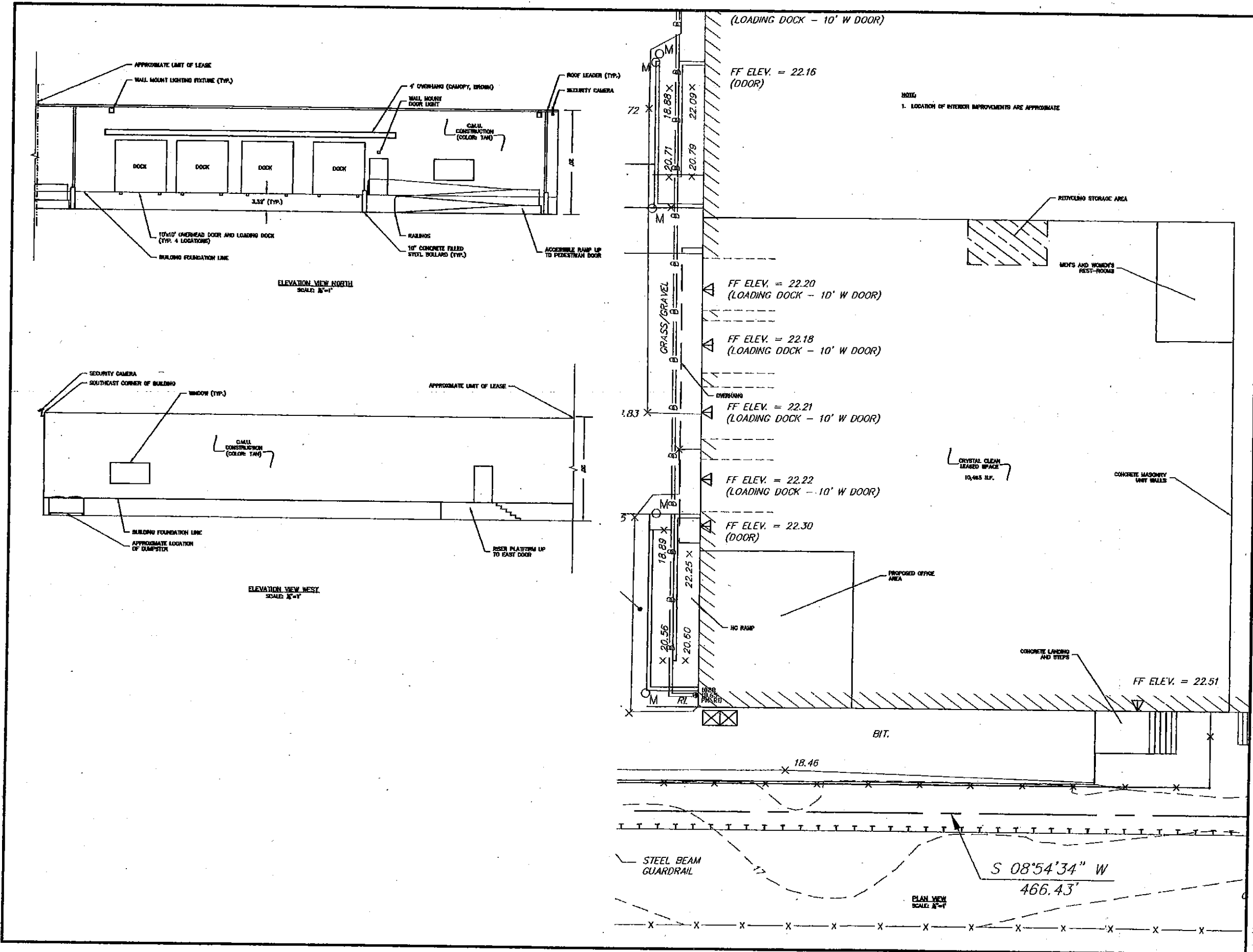
Legend

-  Fire extinguisher
-  Spill kit
-  Asphalt area - route truck parking area
-  Concrete area - loading/unloading area
-  Transfer area



Heritage - Crystal Clean Hartford Branch 94 Murphy Road Hartford, CT 06114
<b>Figure I-1a</b> <b>Floor Plan</b>

Date: 02/15/13 <span style="margin-left: 100px;">Drawn By: Nick Wiederholt</span> <span style="float: right;">Project No: P4001.006</span>



**HERITAGE -  
CRYSTAL CLEAN  
HARTFORD BRANCH**

IN  
HARTFORD  
CONNECTICUT

DETAILS

AUGUST 2, 2011

REVISIONS:

NO.	DATE	DESC.

**Figure I-1b**

PREPARED FOR:  
HERITAGE - CRYSTAL CLEAN, LLC  
2175 POINT BLVD, SUITE 375  
ELGIN, ILLINOIS 60123

**BSC GROUP**  
180 Glastonbury Boulevard  
Suite 103  
Glastonbury, Connecticut 06033  
860 652 8227

© 2008 BSC Group, Inc.  
SCALE: AS SHOWN

FILE:  
DWG. NO:  
JOB. NO: B3482.00 SHEET 4 OF 5



**SECTION I**

Hazardous Waste Transfer Facility Permit  
Standard Facility Conditions

Heritage-Crystal Clean  
94 Murphy Road, Hartford CT

Permit No. 06401096-CRW

Table of Contents  
Section I – Standard Facility Conditions

Section	Title	Page
A.	Design and Operation of the Facility .....	1
B.	Effect of the Permit .....	1
C.	Severability .....	1
D.	Confidential Information .....	1
E.	Duties and Requirements .....	1
1.	Duty to Comply.....	1
2.	Duty to Reapply .....	2
3.	Need to Halt or Reduce activity Not a Defense .....	2
4.	Duty to Mitigate .....	2
5.	Proper Operation and Maintenance .....	2
6.	Permit Actions .....	2
7.	Property Rights .....	2
8.	Duty to Provide Information .....	2
9.	Inspection and Entry .....	2
10.	Security .....	3
11.	Monitoring and Records .....	3
12.	Signatory Requirements .....	4
13.	Transfers .....	4
14.	Reporting Requirements .....	4
15.	Computation of Time .....	6
16.	Availability, Retention and Disposition of Records .....	6
17.	Additional Requirements .....	7
18.	Federal and State Law .....	7
F.	Definitions .....	8

098-7-517

**SECTION I**  
**Standard Facility Conditions**

**A. DESIGN AND OPERATION OF THE FACILITY**

The Permittee (as defined in Section I.F.26. below) shall operate, maintain and repair the Facility in accordance with the permit application (Application No. 200802663) filed with the Department on November 14, 2008 as amended on June 4, 2013 except where modified by more stringent conditions contained herein, to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of non-RCRA and RCRA hazardous waste or non-RCRA and RCRA hazardous waste constituents to the air, soil, or surface water which may threaten human health or the environment.

**B. EFFECT OF THE PERMIT**

1. Except as is provided for in Regulations of Connecticut State Agencies (“RCSA”) Section 22a-449(c)-110(a)(2) and except for any federally enforceable requirement(s), compliance with this Permit during its term constitutes compliance, for purposes of enforcement, with Connecticut General Statutes (“CGS”) Sections 22a-449(c) and 22a-454. This Permit may be modified, revoked and reissued, or terminated during its term as set forth in RCSA Section 22a-449(c)-110(a)(1), which incorporates by reference Title 40 of the Code of Federal Regulations (“40 CFR”) 270.41, 270.42 and 270.43.
2. The issuance of this Permit does not authorize any injury to persons or property, invasion of other private rights, or any infringement of federal, state and local law or regulations.

**C. SEVERABILITY**

The provisions of this Permit are severable, and if any provisions of this Permit, or the application of any provisions of this Permit to any circumstances is held invalid, the application of such provisions to other circumstances and the remainder of this Permit shall not be affected thereby.

**D. CONFIDENTIAL INFORMATION**

If the Permittee wishes to claim that any information required to be submitted by this Permit contains or constitutes a trade secret and should be considered confidential information in accordance with CGS Section 1-210(b)(5), the Permittee shall provide written justification to the Commissioner for making such claim.

**E. DUTIES AND REQUIREMENTS**

1. Duty to Comply. The Permittee shall comply with all conditions of this Permit except that the Permittee need not comply with the conditions of this Permit to the extent and for the duration such noncompliance is authorized in an Emergency Permit that explicitly authorizes any such noncompliance. Noncompliance by the Permittee with the terms of this Permit, except under the terms of an Emergency Permit, shall constitute a violation of this Permit and any applicable laws or regulations and is grounds for enforcement action, for permit termination, revocation and reissuance, or denial of a permit renewal. Emergency Permit as used herein shall mean an Emergency Permit as identified in RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.61.

Unless superseded by a more stringent provision in this Permit, as a condition of this Permit, the Permittee shall comply with all of the applicable requirements of RCSA



Sections 22a-449(c)-100 et. seq., including any portion of 40 CFR 260 through 279 incorporated by reference herein.

2. Duty to Reapply. If the Permittee wishes to continue engaging in an activity authorized by this Permit after the expiration date of this Permit, the Permittee shall apply for renewal of this Permit in accordance with RCSA Sections 22a-3a-5, 22a-449(c)-104(a) incorporating 40 CFR 264.101 and any other applicable law.
3. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce any activity authorized by this Permit in order to maintain compliance with the conditions of this Permit.
4. Duty to Mitigate. In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent the noncompliance from having significant adverse impacts on human health or the environment. No action taken by the Permittee pursuant to Section I of this Permit shall not affect or limit the Commissioner's authority under any other statute or regulation.
5. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain the Facility and all systems of storage, treatment and control (and related appurtenances) installed or used by the Permittee to achieve compliance with this Permit. Proper operation and maintenance, at a minimum, includes effective performance, adequate funding, adequate operator staffing and training, and adequate analytical data, including appropriate quality assurance procedures. This provision requires the operation of back-up, auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit.
6. Permit Actions. This Permit may be modified, revoked and reissued, or terminated in accordance with RCSA Sections 22a-449(c)-110(a)(1) incorporating 40 CFR 270.41, 270.42 or 270.43, and all applicable law, including but not limited to, CGS Sections 22a-6g and 6h, and RCSA Section 22a-3a-5. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated non-compliance, does not stay any permit condition.
7. Property Rights. This Permit does not convey any property rights of any sort, or any exclusive privilege to the Permittee.
8. Duty to Provide Information. The Permittee shall furnish to the Commissioner, within a timeframe specified by the Commissioner, any information which the Commissioner may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit or to determine compliance with this Permit. The Permittee shall also furnish to the Commissioner, upon request, copies of records required to be kept by this Permit.
9. Inspection and Entry. The Permittee shall allow the Commissioner or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- (a) Enter at reasonable times any location where a activity that is regulated by this Permit is conducted, or where records must be kept under the conditions of this Permit;
- (b) Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, operations regulated or required under this Permit; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by any applicable statute, any substances or parameters at any location.

10. Security

- (a) The Permittee shall prevent the unknowing and unauthorized entry of persons or livestock into the Facility.
- (b) The Permittee shall ensure that:
  - (i) All entrances to the Facility are locked at all times unless authorized personnel are present;
  - (ii) Access to the Facility is limited to the emergency coordinators, security personnel or other authorized personnel who have received training in accordance with this Permit and all other applicable law; and
  - (iii) Signs bearing the legend "Danger-Unauthorized Personnel Keep Out" shall remain posted at each entrance to the Facility and at other locations in sufficient numbers to be seen from any approach to the Facility's entrances. The legend shall be written in English and shall be legible from a distance of at least twenty-five (25) feet.
- (c) The Permittee shall ensure that the site has:
  - (i) A twenty-four (24) hour surveillance system (e.g., television monitoring or surveillance by guards or Facility personnel) which continuously monitors and controls entry onto the site; or
  - (ii) An artificial or natural barrier (e.g., a fence in good repair) which completely surrounds the site; or
  - (iii) A means to control entry, at all times, through gates or other entrances to the site (e.g., an attendant, television monitors, locked entrance or a controlled roadway access to the site).
- (d) The Permittee shall maintain all security systems in good repair until Final Closure of the Facility.

11. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for

continuous monitoring instrumentation, copies of all reports required by this Permit, the certification required by RCSA Section 22a-449(c)-104(a)(1) incorporating 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit, for a period of at least five (5) years from the date of the sample, measurement, report or application. This period may be extended by request of the Commissioner at any time. The Permittee shall maintain records for all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the Facility.

- (c) Monitoring records shall include:
- (i) The date, exact place and time of sampling or measurements;
  - (ii) The individual(s) who performed the sampling or measurements and the company affiliation;
  - (iii) The date(s) analyses were performed;
  - (iv) The individual(s) who performed the analyses and the company affiliation;
  - (v) The analytical techniques or methods used; and
  - (vi) The results of such analyses.

12. Signatory Requirements. The Permittee's application and all reports or information submitted to the Commissioner by the Permittee pursuant to this Permit shall be signed by the person specified in and contain the certification prescribed in RCSA Section 22a-449(c)-110(a)(2) incorporating 40 CFR 270.11.
13. Transfers. This Permit is not transferable to any person without advanced written authorization of the Commissioner, who may request whatever information deemed necessary regarding the potential transferee. Before any such transfer, the Permittee and any proposed transferee shall fully comply with the requirements of CGS Section 22a-60. The Commissioner may require modification or revocation and reissuance of this Permit to change the name of the Permittee and as an incident to any such transfer, incorporate such other requirements as the Commissioner deems necessary.

In advance of transferring ownership or operation of its Facility prior to the termination of this Permit, the Permittee shall notify the prospective new owner or operator in writing of the requirements of this Permit, 40 CFR 264 through 270 and RCSA Section 22a-449(c)-100 et. al. The Permittee shall provide the prospective new owner or operator with a copy of this Permit.

The Permittee's failure to notify the new Permittee of the requirements of this Permit in no way relieves the new Permittee of the obligations to comply with all applicable regulations.

14. Reporting Requirements.
- (a) Anticipated Non-compliance. The Permittee shall give as much advance written notice as possible to the Commissioner of any planned changes in the Facility or activity, which may result in non-compliance with any requirement of this Permit.

- (b) Compliance Schedules. Except where otherwise provided for in this Permit, reports of compliance and noncompliance with, or any progress reports on, interim and final requirements contained in any Compliance Schedule (Section V) of this Permit, shall be submitted no later than fourteen (14) calendar days following each schedule date, to the extent such reports are required herein.
- (c) Twenty-four (24) Hour Reporting.
- (i) The Permittee or designee shall verbally report to the Commissioner any waste related activity at the Facility, irrespective of whether such activity is in compliance with the requirements of this Permit, immediately but no later than twenty-four (24) hours from the time the Permittee becomes aware or should be aware of the circumstances causing such endangerment.

The report to the Commissioner shall include:

- (A) Name, address, and telephone number of the Permittee;
  - (B) Name, address, and telephone number of the Facility;
  - (C) Date, time and type of incident;
  - (D) Description of the occurrence and its cause;
  - (E) Name and quantity of waste(s) or constituents thereof involved;
  - (F) The extent of injuries, if any;
  - (G) An assessment of actual or potential hazards to human health or the environment;
  - (H) Estimated quantity and disposition of recovered waste that resulted from the incident;
  - (I) All information concerning the release of any waste or waste constituents thereof that may cause an endangerment to public drinking water supplies; and
  - (J) All information concerning a release or discharge of waste or waste constituents, or of a fire or explosion at the Facility, which could threaten human health or the environment.
- (ii) A written submission shall also be provided within five (5) calendar days from the time the Permittee becomes aware of the circumstances described in subdivision (i) above. The written submission shall contain a description of the endangerment and its cause; the period of endangerment including exact dates and times, if the endangerment has been abated, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the endangerment. The Permittee shall maintain in the operating record of its Facility a copy of all such written reports. The Commissioner may waive the five (5) day written notice requirement in favor of a written report within fifteen (15) days of any incident requiring reporting.
- (iii) Nothing in this section shall effect or relieve the Permittee of its obligations under CGS Sections 22a-6u and 22a-450.

- (d) Manifest Discrepancy Report. The Permittee shall report manifest discrepancies in accordance with RCSA Section 22a-449(c)-104(a)(1) incorporating 40 CFR 264.72, which is hereby incorporated by reference herein.
  - (e) Unmanifested Waste Report. The Permittee shall report unmanifested waste in accordance with RCSA Section 22a-449(c)-104(a)(1) incorporating 40 CFR 264.76.
  - (f) Other Non-compliance. The Permittee shall report all instances of noncompliance with this Permit not otherwise required to be reported by this Permit to the Commissioner along with any other required monitoring report, no later than thirty (30) days from the date the Permittee is aware, or reasonably should have been aware of any such noncompliance. Any such report shall contain the information listed in Condition No. I.E.14.(c)(i) of this Permit.
  - (g) Other Information. When the Permittee becomes aware that it failed to submit any relevant facts or information in a permit application, or submitted incorrect information in a permit application, report or other document provided to the Commissioner regarding this Permit, the Permittee shall submit such relevant facts or correct information to the Commissioner within thirty (30) calendar days of becoming aware of such failure.
15. Computation of Time.
- (a) Except as expressly provided for in this Permit, the computation of time periods set forth in this Permit shall be as follows:
    - (i) Any time period scheduled to begin on the occurrence of an act or event shall begin on the calendar day after the act or event.
    - (ii) Any time period scheduled to begin before the occurrence of an act or event shall be computed so that the period ends on the calendar day before the act or event.
  - (b) Submission of Reports. Where this Permit requires the submission of a written report, a notification or other information or documentation to the Commissioner, the report or notification shall be deemed submitted on the date such report, notification or other information is received by the Department of Energy and Environmental Protection (DEEP).
    - (i) If the final day of any time period falls on a Saturday, Sunday or federally or state recognized legal holiday, the time period shall be extended to the next business day.
16. Availability, Retention and Disposition of Records
- (a) The Permittee shall ensure that all records consistent with the requirements of RCSA Sections 22a-449(c)-100 to 119 or this Permit, including all plans, are furnished upon request and made available at all reasonable times for inspection, by any officer, employee, or representative of DEEP or EPA.

(b) The retention period for all records consistent with the requirements of RCSA Sections 22a-449(c)-100 to 119 and this Permit is extended automatically during the course of any unresolved enforcement action regarding the Facility or as requested by the Commissioner or the Regional Administrator of EPA.

17. Additional Requirements. Requirements not included in this Permit, which become effective by statute or regulation, and not made specifically inapplicable to facilities with a permit, shall apply to the Permittee's Facility. In the event of any conflict between this Permit and any such requirement, the Permittee shall comply with the more stringent requirement. If the Permittee does not fully comply with the more stringent requirement, DEP may enforce either requirement.

18. Federal and State Law. Nothing in this Permit shall be construed to prohibit any federal, state or political subdivision thereof from imposing any requirements to the extent authorized by law which are more stringent than those imposed by this Permit.

In addition, nothing in this Permit shall relieve the Permittee of the obligation to comply with any other applicable federal, state, or local statute, regulation or ordinance.

**F. DEFINITIONS**

Any term not otherwise defined herein shall be defined as that term is defined in RCSA Sections 22a-449(c)-100 thru 119 incorporating 40 CFR 260 through 279.

1. “Arrived”, “Arrived at” and “Arrival” shall mean the point in time at which any waste enters the Facility (i.e. enters through the Facility gate).
2. “CFR” shall mean the Code of Federal Regulations in effect on the date that this Permit is issued.
3. “CGS” shall mean the Connecticut General Statutes in effect on the date this Permit is issued.
4. “Commissioner” shall mean the Commissioner of Energy and Environmental Protection as defined in CGS Section 22a-2 or the Commissioner’s designee.
5. “Container” shall mean any portable device, which meets the requirements of 40 CFR 262.30 in which waste is stored, transported or otherwise managed while at the Facility.
6. “Daily” shall mean for the purposes of this Permit once every twenty-four (24) hours.
7. “Department” or “DEEP” shall mean the State of Connecticut Department of Energy and Environmental Protection.
8. “DOT” shall mean the United States Department of Transportation.
9. “Each Operating Day” shall mean for the purposes of this Permit once every twenty-four (24) hours when the Facility is conducting any waste management activity.
10. “Facility” shall mean, pursuant to 40 CFR 260.10, all contiguous land and structures, other appurtenances and improvements on land, used for treating, storing or disposing of hazardous waste and all contiguous property under control of the owner or operator.

For the purposes of this Permit the Facility is defined as the property located at 94 Murphy Road, Hartford where waste transfer activities are conducted pursuant to this Permit.

11. “Final Closure” shall mean the completion of the closure of all waste management areas at the Permittee’s Facility in accordance with the requirements of this Permit.
12. “Hazardous Waste” or “Hazardous Wastes” or “RCRA Hazardous Waste” shall mean hazardous waste as identified or listed as hazardous waste pursuant to 42 U.S.C. Section 6901 et. seq. and RSCA Section 22a-449(c)-101.
13. “Inbound Trailer” shall mean any trailer containing waste that has entered the Site within the previous twenty-four hours and for which no waste has either been added or removed.

14. “Intermediate Bulk Container” or “IBC” shall mean a “intermediate bulk container” as defined by the U.S.DOT 49 CFR 171.8 and has a maximum capacity of two hundred seventy five (275) gallons or less as a receptacle for waste.
15. “In-transit Trailer” shall mean any trailer that is in route to a valid consignee and is in transportation pursuant to DOT 49 CFR 105.15.
16. “Lab Pack Container” shall mean an outer DOT approved 55-gallon drum that contains individual containers with maximum volume(s) of five (5) gallons or less from chemical users such as schools with a chemical inventory, or from hospitals, dentists or other medical facilities, which have chemicals with an expired shelf life. Lab pack containers shall be packed in accordance with the requirements of 49 CFR 173.12(b) “Exception for Shipment of Waste Materials, Lab Packs”.
17. “Loading and Unloading Dock Area” shall mean the entire Loading and Unloading Dock Area, structures and other appurtenances identified as the “Loading and Unloading Dock Area” as shown on the Floor Plan (Figure I-1b), revised as of February 2013, and as specified in Section II.A. of this Permit.
18. “NFPA” shall mean the National Fire Protection Association.  
For the purposes of this permit shall mean NFPA 704 “Standard Systems for the Identification of the Hazards of Materials for Emergency Response” 2007 Edition or most recent version.
19. “Non-bulk Container” shall mean a DOT approved container which has a maximum capacity of 208 liters (55 gallons) or less as a receptacle for waste.
20. “Non-RCRA Hazardous Waste” shall mean hazardous waste as defined in Section 22a-448 of the CGS, excluding RCRA hazardous waste, and shall include wastes regulated in Connecticut and other states and non-regulated wastes.
21. “Outbound Trailer” shall mean any trailer containing waste which is scheduled and expected to exit the Facility within twenty-four (24) hours and prior to the end of the tenth day from the date of arrival.
22. “Partial Closure” shall mean the closure of a waste management area in accordance with the applicable closure requirements of this Permit while other waste management areas continue in operation or to be active.
23. “Permittee” shall mean the person responsible for the overall operation of the Facility who has been issued a license from the Commissioner. As used herein “person” is defined in Section 22a-2(c), Chapter 439, of the CGS, and “license” is defined in Section 4-166, Chapter 54, of the CGS.
24. “Personnel” or “Facility Personnel” shall mean all persons who work at or oversee the operations of the Facility and whose activities or failure may result in noncompliance with the requirements of this Permit.
25. “RCRA” shall mean the Resource Conservation and Recovery Act.



26. “RCSA” shall mean the Regulations of Connecticut State Agencies in effect on the date that this Permit is issued.
27. “Route Truck” shall mean Heritage Crystal-Clean’s box truck with a maximum capacity of one thousand two hundred (1,200) gallons of waste.
28. “Route Truck Parking Area” shall mean the entire Route Truck Parking Area, structures and other appurtenances identified as the “Route Truck Parking Area” as shown on the Floor Plan (Figure I-1b), revised as of February 2013, and as specified in Section II.A. of this Permit.
29. “Site” shall mean the same or geographically contiguous property which may be divided by public and private right-of-way, provided the entrance and exit between the properties is at a cross-road intersection, and access is by crossing, as opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way that he controls and to which the public does not have access, is also considered part of the site property.
30. “Sufficiently Impervious” shall mean: (a) free of gaps, cracks and areas of bare earth; (b) capable of containing any RCRA hazardous waste, used oil or other material that may be accidentally or otherwise released such that any such RCRA hazardous waste, used oil or other material released does not migrate or seep from or through the secondary containment system into the environment; (c) compatible with any RCRA hazardous waste, used oil or other material that may be accidentally or otherwise released into the secondary containment system; (d) if necessary, coated with a material resistant to weathering or damage such that any RCRA hazardous waste, used oil or other material that may be accidentally or otherwise released into the secondary containment system does not migrate or seep from or through the secondary containment system into the environment; and (e) free of floor or other drains, catch basins or similar structures that would allow RCRA hazardous waste, used oil or other material to be released into the environment.
31. “Transfer Trailer” shall mean Heritage Crystal-Clean’s designated trailer portion of the vehicle that will be used to store wastes on-site for a period of time not to exceed ten days from the date of arrival. The maximum storage capacity is four thousand four hundred (4,400) gallons. These trailers have secondary containment system consisting of: the enclosed trailer, the steel floor that extends up the sides and front of the trailer approximately eighteen (18) inches, and a dam at the open end that provides secondary containment in the amount of four hundred and forty (440) gallons as specified in Section II.A. of this Permit.
32. “Truck-to-Truck Transfer” shall mean the transfer of waste(s) from one vehicle to another or from one mode of transportation to another.
33. “Universal Wastes(s)” shall mean “universal wastes” as defined in RCSA Section 22a-449(c)-113 incorporating 40 CFR 273. For the purposes of this Permit, universal wastes shall be limited to; used electronics, mercury-containing lamps, and batteries.

34. “Used Oil” shall mean any oil refined from crude oil or synthetic oil, that: (a) has been used and as a result of such use is contaminated by physical or chemical impurities; or (b) is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties; or as defined in 40 CFR 279.
35. “Waste(s)” shall include “chemical liquids”, “non-RCRA hazardous waste”, “RCRA hazardous waste” and for the purposes of this Permit shall include, “oil or petroleum”, and “waste oil” as those terms are defined in Section 22a-448 of the CGS and shall also include “used oil” as that term is defined in RCSA Section 22a-449(c)-119.
36. “Waste Management Units” or “Waste Management Areas”, unless specifically limited by this Permit or unless the context unequivocally indicates otherwise (e.g., that reference is being made to only one and not all areas), shall mean all of the waste management units at the Facility including the: 1) Transfer Area; 2) Loading and Unloading Dock Area; and 3) Route Truck Parking Area as specified in Section II.A. of this Permit including all secondary containment areas associated with these areas.

(

( :

(

**SECTION II**

**Hazardous Waste Transfer Facility Permit  
Permitted Activities**

**Heritage Crystal-Clean  
94 Murphy Road, Hartford, CT**

**Permit No. 06401096-CRW**

Table of Contents  
Section II – Permitted Activities

Section	Title	Page
A.	Waste Management Areas	
1.	Transfer Area .....	II-3
2.	Loading and Unloading Dock Area .....	II-3
3.	Route Truck Parking Area.....	II-4
B.	Waste/Material Prohibition .....	II-5
C.	Protocol for Receipt of Waste .....	II-8
Tables		
II-1a	Construction, Dimensions and Permitted Capacities of Waste Management Areas .....	II-9
II-1b	Maximum Number of Drums and the Required Secondary Containment Volume .....	II-9
II-2	Permitted Waste Streams .....	II-10

**SECTION II**  
**Permitted Activities**

**A. WASTE MANAGEMENT AREAS**

This Permit authorizes only those activities which are explicitly authorized in this Permit. As used in this Permit, the terms “manage”, “management”, “process” or “storage” do not, and shall not be construed, to authorize any activity which is not explicitly authorized by this Permit.

The Permittee shall design, construct, operate, maintain and repair the Facility in conformance with its Application No. 200802663 received by the Department on November 14, 2008, amended as of June 4, 2013 and the requirements of this Permit. In the event of a conflict between the Application and the requirements of this Permit, the requirements of this Permit shall take precedence and apply.

This Permit authorizes the Permittee to manage wastes in the following Waste Management Areas of its Facility: 1) Transfer Area; 2) Unloading/Loading Dock Area; and 3) Route Truck Parking Area. The activities authorized by this Permit are described below.

1. TRANSFER AREA

- (a) Authorized Activity: The Permittee is authorized to: perform the Truck-to-Truck Transfer of IBCs, Non-bulk Containers and Lab Pack Containers of permitted wastes.
- (b) Design and Construction: The Transfer Area is located inside the facility building and adjacent to the Loading/Unloading Dock Area as shown on Figure No. I-1b. This area consists of a forty-eight (48) foot long and twenty-eight (28) foot wide concrete floor as specified in Table II-1a.
- (c) Permitted Wastes: In addition to the General Prohibitions in Section II.B., the Permittee shall not bring to, place within or allow in this area any waste or other material other than those types which are associated with the wastes identified in Table II-2.
- (c) Area Capacity: The Permittee shall not, at any time, allow the staging or storage of wastes in this area.

2. LOADING AND UNLOADING DOCK AREA

- (a) Authorized Activity: The Permittee is authorized to: perform the Truck-to-Truck Transfer of IBCs, Non-bulk Containers and Lab Pack Containers of permitted wastes.
- (b) Design and Construction: The Loading and Unloading Dock Area is located outside the facility building and adjacent to the Transfer Area as shown on Figure No. I-1b. This area consists of a fifty-five (55) foot long and fifty (50) foot wide concrete base as specified in Table II-1a.

Secondary containment for this area is provided through the secondary containment systems contained within the Transfer Trailers and Route Trucks. For

the purposes of determining compliance with the secondary containment volume limit for the Loading and Unloading Dock Area, the Permittee shall increase the containment volume for any device or structure creating negative containment volume (e.g., wheels, chocks, equipment.) as indicated in Table II-1b.

The Permittee shall ensure that stormwater runoff is properly managed and addressed in accordance with the Permittee's Stormwater Pollution Prevention Plan for the Site.

- (d) Permitted Wastes: In addition to the General Prohibitions in Section II.B., the Permittee shall not bring to, place within or allow in this area any waste or other material other than those types which are associated with the wastes identified in Table II-2. The Permittee may store virgin materials and off-specification chemical with the permitted wastes provided they are compatible in accordance with the requirements of 49 CFR Subpart C (40 CFR 177.848(e)) and the Waste Analysis Plan of this Permit.
- (e) Area Capacity: The Permittee shall not, at any time, place or allow more than a total of four (4) transportation vehicles consisting of: one (1) Transfer Trailer and three (3) Route Trucks comprising a total of eight thousand (8,000) gallons of waste or other materials in the Loading and Unloading Dock Area as identified in Table II-1a. For the purposes of determining compliance with the capacity limits, all containers of waste, whether in a vehicle or otherwise, shall be considered full.

### 3. ROUTE TRUCK PARKING AREA

- (a) Authorized Activity: The Permittee is authorized to: park transportation vehicles that do not contain waste, but may contain other materials destined for the facility.
- (b) Design and Construction: The Route Truck Parking Area No. is located in the southeast corner of the property as shown on the Figure No. I-1a of this Permit. This area consists of a four thousand six hundred fourteen (4,614) square feet asphalt paved area. The dimensions of the Route Truck Parking Area are specified in Table II-1 and illustrated in Figure No. I-1a.

The Permittee shall ensure that the base of the Route Truck Parking Area is sufficiently impervious with no visible cracks or gaps in the asphalt pavement material.

The Permittee shall ensure that stormwater runoff is properly managed and addressed in accordance with the Permittee's Stormwater Pollution Prevention Plan for the Site.

- (c) Permitted Wastes: The Permittee shall not, at any time, allow the staging or storage of wastes in this area.

## B. WASTE/MATERIAL PROHIBITIONS

### 1. SPECIFIC PROHIBITIONS

In addition to the prohibitions applicable to each waste management area specified in Section II.A., the Permittee shall not allow any of the following wastes, other materials or products to be brought to, placed within or to enter the Facility:

- (a) Wastes, other materials or products that exhibit and of the following hazards:
- (i) NFPA Health Hazard Rating of 4 for inhalation:
    - Gases whose  $LC_{50}$  for acute inhalation toxicity is less than or equal to 1000 ppm;
    - Any liquid whose saturate vapor concentration at 68° F is equal to or greater than 10 times the  $LC_{50}$  for acute inhalation toxicity if the  $LC_{50}$  is less than or equal to 1000ppm; and
    - Dusts and mists whose  $LC_{50}$  for acute inhalation toxicity is less than or equal to 0.5 mg/L.
  - (ii) NFPA Health Hazard Rating of 4 for materials: whose  $LD_{50}$  for acute dermal toxicity is less than or equal to 40 mg/kg; and whose  $LD_{50}$  for acute oral toxicity is less than or equal to 5 mg/kg.
  - (iii) NFPA Flammability Hazard Rating of 4: Flammable gases; Flammable cryogenic materials; Any liquid or gaseous material that is a liquid while under pressure and has a flash point below 73° F and a boiling point below 100° F (Class 1A liquids); Materials that ignite spontaneously when exposed to air; and Solids containing greater than 0.5 percent by weight of a flammable or combustible solvent are rated by the closed cup flash point of the solvent.
  - (iv) NFPA Flammability Hazard Rating of 3:
    - Liquids having a flash point below 73° F and boiling point at or above 100° F and those liquids having a flash point at or above 73° F and below 100° F (Class 1B and 1C liquids);
    - Finely divided solids, less than 75 micrometers, that present an elevated risk of forming an ignitable dust cloud;
    - Materials that burn with extreme rapidity, usually by reason of self-contained oxygen (organic peroxides);
    - Solids containing greater than 0.5 percent by weight of a flammable or combustible solvent are rated by the closed cup flash point of the solvent.
  - (v) NFPA Instability Hazard Rating of 4: Materials that are sensitive to localized thermal or mechanical shock at normal temperatures and pressures; and materials that have an instantaneous power density at 250° C of 1000 watts per millimeter or greater. (Materials that in themselves are readily capable of detonation or explosive decomposition or explosive reaction at normal temperatures and pressures.)
  - (vi) NFPA Instability Hazard Rating of 3: Materials that have an instantaneous power density at 250° C at or above 100 watts per millimeter and below 1000 watts per millimeter; and Materials that are sensitive to thermal or mechanical shock at elevated temperatures and



- pressures. (Materials that in themselves are not capable of detonation or explosive decomposition or explosive reaction but require a strong initiating source or must be heated under confinement before initiation)
- (vii) Liquids whose vapors may form an explosive mixture with air; or oxidize in air to form peroxides that may spontaneously explode; or require testing for the presence of peroxides.
  - (viii) Materials easily ignited by heat, spark or flame; or spontaneously flammable/ignitable.
  - (ix) Materials that react with water and produce toxic or poisonous gases (e.g. hydrogen cyanide, phosgene, phosphine or hydrogen sulfide); or are deemed "Water Reactive".
  - (x) Materials that require inhibition prior to shipment due to potential for violent or explosive polymerization.
  - (xi) Materials that have a dangerous fire and explosion risk, or are extremely hazardous or highly reactive.
  - (xii) Gases that are easily ignited by heat, spark or flame and whose vapors may form explosive mixture with air.
  - (xiii) Materials that require climate controlled storage.
  - (xiv) Materials that require shipment below specified concentration; or must be wetted at specified percentage to avoid reaction or explosion.
  - (xv) Materials that may cause the container to explode when heated.
  - (xvi) Materials in which strong heat or shock will detonate.
  - (xvii) Substances that emits cyanide, chlorine, phosgene or other poisonous gas when heated or in fire.
- (b) Any of the following US DOT Hazardous Materials:
- (i) Class 1 Material (Explosives and Shock Sensitive Materials)
  - (ii) Class 2, Division 2.1 Material (Flammable Gas) with the exception of spent aerosol cans not exceeding 32 oz.
  - (iii) Class 2, Division 2.3 Material (Gas Poisonous by Inhalation)
  - (iv) Class 3 (Flammable Liquids) Packing Groups I and II
  - (v) Class 4, Division 4.1 Material (Self-reactive Substances and Solid Desensitized Explosives)
  - (vi) Class 4, Division 4.2 Material (Spontaneously Combustible Materials)
  - (vii) Class 4, Division 4.3 Material (Dangerous When Wet Material)
  - (viii) Class 6, Division 6.2 Material (Infectious Substances)
  - (ix) Class 7 Material (Radioactive Material)
- (c) Wastes from a specific or sources as defined in 40 CFR 261.32, also known as K codes.

- (d) Commercial Chemical products, manufacturing chemical intermediates or off-specification commercial chemical products or manufacturing chemical intermediates identified as acute hazardous wastes as defined in 40 CFR 261.33(e), also known as P codes.
- (e) In addition, to the above, any RCRA hazardous wastes that is not identified in Table II-2, *Permitted Waste Codes*, of this Permit.

2. WASTE CODE RESTRICTIONS

The Permittee shall ensure that any permitted wastes, other materials and products are in compliance with the capacity and storage restrictions identified below and as specified in Table II-2 of this Permit.

- (a) Lab Packs – maximum outer container volume of fifty five (55) gallons containing inner containers not to exceeding: one (1) liter in volume for glass containers or five (5) gallons in volume for metal or plastic containers; and are surrounded by a chemically compatible absorbent material sufficient in quantity to absorb the total amount of liquid waste.
- (b) 30-Gallon Non-bulk Container – DOT approved containers not to exceed a maximum container volume of thirty (30) gallons.
- (c) 55-Gallon Non-bulk Container – DOT approved containers not to exceed a maximum container volume of fifty five (55) gallons.
- (d) 275-Gallon IBC – intermediate bulk container as defined in 49 CFR 171.8 and does not exceed a maximum capacity of two hundred seventy five (275) gallons.

**C. PROTOCOL FOR RECEIPT OF WASTE**

1. The Permittee shall ensure that all Inbound Vehicles entering the Facility use entrance off of Murphy Road and enter through the facility gate. The drivers shall report to the office with the appropriate manifest or shipping papers (e.g., bill of lading) prior to unloading any waste at the Facility. Waste transportation vehicles shall be parked or staged until all waste verification procedures required pursuant to the Waste Analysis Plan, included as Attachment A of this Permit have been completed.
2. Upon confirming that the wastes described on the manifest or shipping papers match their corresponding profile(s) (previously submitted in accordance with the Waste Analysis Plan), wastes deemed acceptable shall be directed to the Transfer Trailer. The Permittee shall ensure that all wastes are transferred from the Route Trucks to the Transfer Trailer by the end of the operating day on which the wastes arrived.
3. The Permittee shall reject each container of waste that is not within the acceptable parameters required by this Permit in accordance with the Waste Analysis Plan. The Permittee shall ensure that rejected waste is transported off-site to either the generator or a treatment/storage/disposal facility (TSDF) within twenty-four (24) hours from the time such wastes arrived at the Facility with the exception of instances that occur during legal holidays or weekends.
4. The Permittee shall immediately record and keep a written or electronic record of all waste that enters and is transferred from the Facility. The Permittee shall maintain this information as part of the Facility Operating Record and shall make such record available in written form upon request by the Commissioner. At a minimum, the following information shall be recorded:
  - (a) The inbound manifest or shipping paper number (shipping paper itself);
  - (b) The date the waste was picked up from the generator;
  - (c) The date the waste entered the Facility (facility receipt date on the shipping paper);
  - (d) The outbound shipping document number (outbound logs); and
  - (e) The date the waste was transferred from the Facility (referenced on outbound logs).
5. The Permittee shall maintain in the Operating Record for the Facility, the completed records for each shipment of waste, including but not limited to, the Facility copy of the manifest or shipping paper, and a copy of the waste profile. Such documentation shall be available as indicated in the Contingency Plan (Attachment B) to be used in the event of an incident requiring implementation of that plan.
6. The Permittee shall ensure that by the end of Each Operating Day, properly trained facility personnel have inspected each container of waste to ensure that containers:
  - (a) Are in good condition with no visually apparent defects (e.g., severe rusting, punctures or dents) that could cause the container to rupture or otherwise leak;
  - (b) Are packaged labeled and marked in accordance with the requirements of 40 CFR 262 Subpart C, 40 CFR 172 Subpart D and 49 CFR 172 Subpart E; and
  - (c) The labels and markings on each container match the description of the waste on the manifest or shipping papers.

**Table II-1a**

**Construction and Dimensions, Permitted Capacities of Waste Management Areas**

Waste Management Area	Construction and Dimensions	Minimum Secondary Containment Capacity (Gallons)	Permitted Capacity (Gallons) and 40 CFR 264 Appendix V Waste Type
Transfer Area	48 ft x 20 ft concrete area within the building, adjacent to the Loading/Unloading Dock Area	None	No storage or staging of wastes is authorized in this area
Loading/Unloading Dock Area	55 ft x 50 ft concrete base with four loading/unloading bays	Containment is provided by the containment systems of the Transfer Trailers and Route Trucks	8,000 gallons total comprised of: One Transfer Trailer 4,000 gallons; and three Route Trucks 1,200 gallons each
Route Truck Parking Area	4,614 square foot area consisting of asphalt	Not Required	No storage or staging of wastes is authorized in this area

**Table II-1b**

**Maximum Number of Drums and the Required Secondary Containment Volume**

No. of 55-Gallon Drums or Equivalents Loaded	Displacement caused by Drums (gallons)	Available Secondary Containment (gallons)	Maximum No. of 55-Gallons Drums or Equivalents Allowed
0	0	5054	91
10	310	4744	86
20	620	4435	80
30	929	4125	74
40	1239	3815	69
50	1549	3505	63
60	1859	3196	58
70	2168	2886	52
80	2478	2576	46

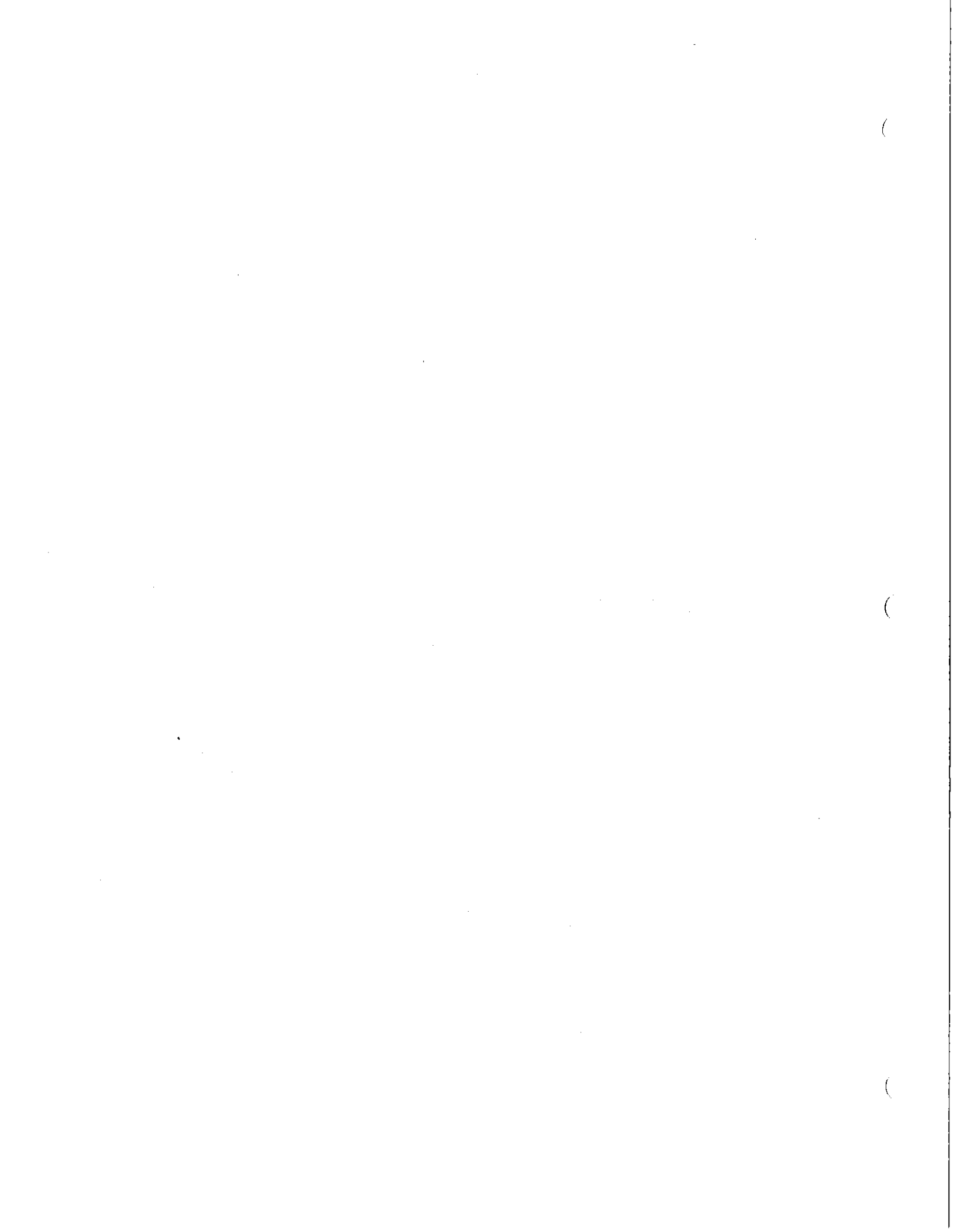
**Table II-2  
 Permitted Waste Streams and Capacity Restrictions**

Waste Code	Lab Packs	30-gallon Non-Bulk Container	55-gallon Non-Bulk Container	275-gallon Intermediate Bulk Container
CR01	X	X	X	X
CR02	X	X	X	X
CR03	X	X	X	X
CR04	X	X	X	X
CR05	X	X	X	X
D001	X	X	X	
D002	X	X	X	
D003	X	X	X	
D004	X			
D006	X	X	X	
D008	X	X	X	
D009	X	X	X	
D010	X			
D011	X	X	X	
D014	X			
D026	X	X	X	
D027	X			
D039	X			
D040	X			
D041	X			
F001		X	X	
F002		X	X	
F003		X	X	
F005		X	X	
F006		X	X	
F007		X	X	
F008		X	X	
F009		X	X	
F010		X	X	
F011		X	X	
F012		X	X	
F019		X	X	
F028		X	X	
F032		X	X	
F034		X	X	
F035		X	X	
U007	X	X	X	
U044	X	X	X	
U051	X	X	X	
U052	X			
U070	X	X	X	
U071	X	X	X	
U072	X	X	X	
U075	X			
U122	X	X	X	
U128	X	X	X	
U131	X	X	X	

**Table II-2  
 Permitted Waste Streams and Capacity Restrictions continued ...**

Waste Code	Lab Packs	30-gallon Non-Bulk Container	55-gallon Non-Bulk Container	275-gallon Intermediate Bulk Container
U144	X	X	X	
U145	X	X	X	
U151	X	X	X	
U165	X	X	X	
U169	X			
U183	X	X	X	
U188	X	X	X	
U202	X	X	X	
U207	X	X	X	
U208	X			
U209	X			
U211	X			
U226	X	X	X	
U228	X	X	X	
U238	X	X	X	
U240	X			
U328	X			

Note: Universal Wastes shall be packaged in accordance with the requirements of RCSA Section 22a-449(c)-113 incorporating 40 CFR 273 and the applicable DOT requirements.



Section II  
Appendix A

Secondary Containment Systems

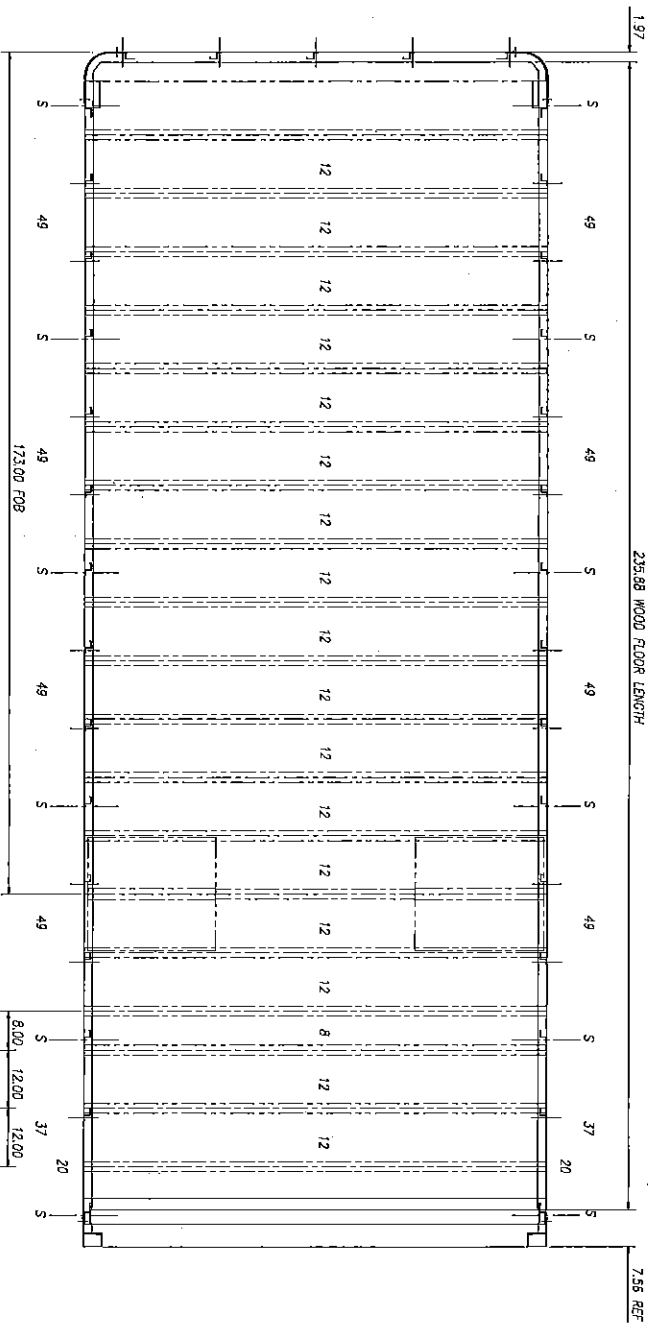


(

(

(

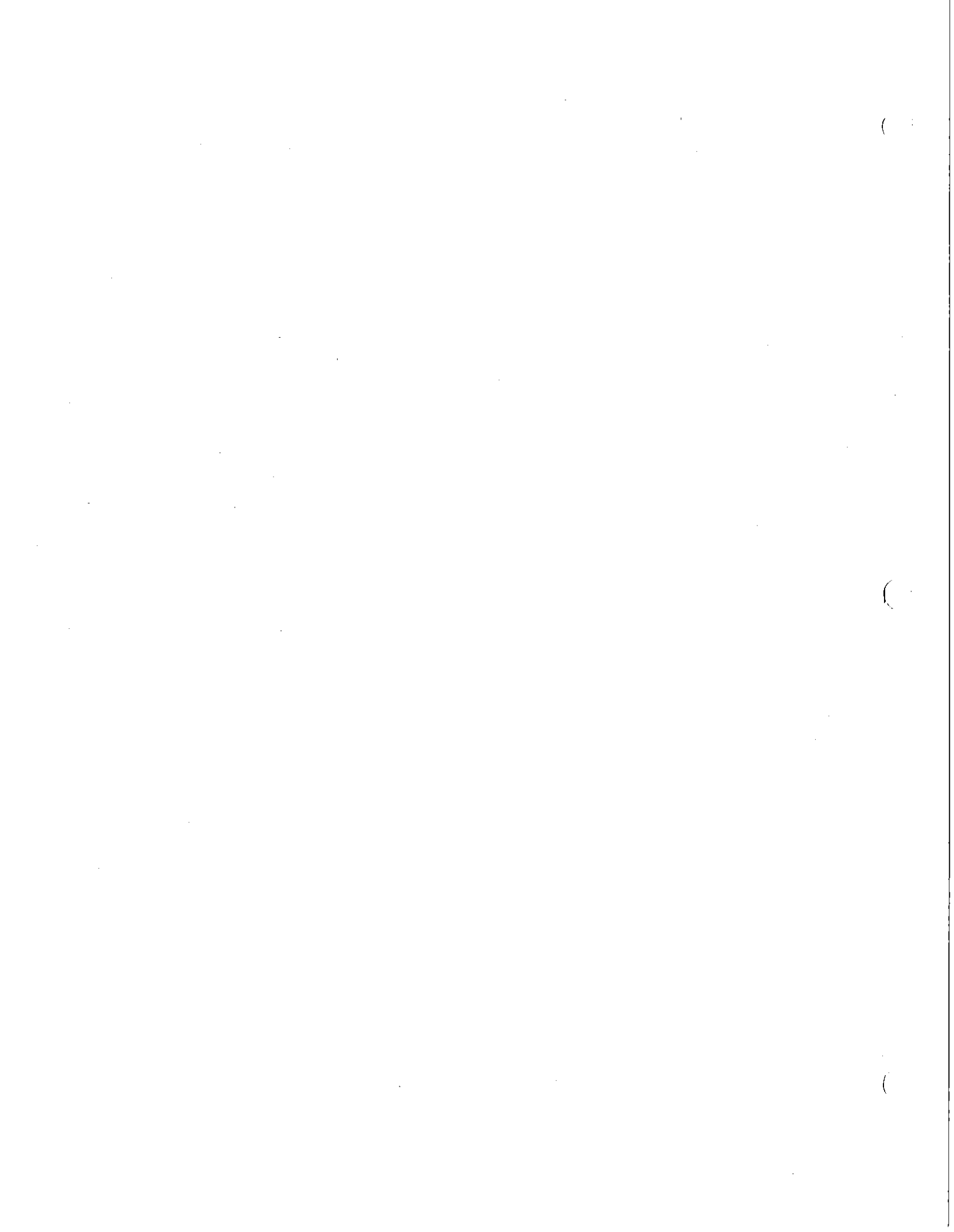
FRONT



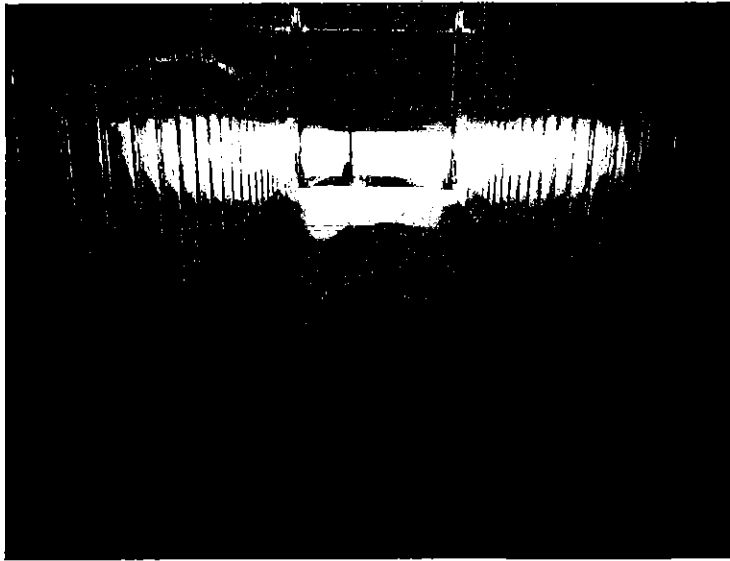
SEE DWG. NO. W140033  
FOR DRAIN SYSTEM  
INSTALLATION

THIS DRAWING IS THE PROPERTY OF JACOBS CORPORATION AND  
MAY NOT BE REPRODUCED, COPIED, OR OTHERWISE TRANSMITTED IN ANY FORM OR BY ANY MEANS  
WITHOUT THE WRITTEN PERMISSION OF JACOBS CORPORATION.

DATE PLOTTED	11/17/92	SCALE	AS SHOWN
PROJECT NO.	W141792	DATE	11/17/92
DESIGNER	JAC	CHECKED	ST
DRAWN	JAC	DATE	11/17/92
PROJECT NAME	BLAY PACCAR CUST08520096	SCALE	AS SHOWN
PROJECT LOCATION	12-74-07	DATE	11/17/92
PROJECT NUMBER	01SD 20'	DATE	11/17/92
PROJECT TITLE	W141792	DATE	11/17/92



**Crystal Clean Hartford Branch  
Trailer Truck Secondary Containment**



TETRA TECH PROJECT NO. 103P4001	DESCRIPTION	This photograph shows the secondary containment that covers the bottom and walls inside the transfer trailer.	1
	CLIENT	Crystal Clean	Date
	PHOTOGRAPHER	Stephanie Luebbering	5/28/12



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the secondary containment that covers the bottom and walls inside the transfer trailer, including the lip located near the door.	2
	CLIENT	U.S. EPA	Date
	PHOTOGRAPHER	Stephanie Luebbering	5/8/12

0

0

0

**SECTION III**

Hazardous Waste Transfer Permit  
Operating Conditions

Heritage Crystal-Clean  
94 Murphy Road, Hartford, CT

Permit No. 06401096-CRW

Table of Contents  
Section III – Operating Conditions

<b>Section</b>	<b>Title</b>	<b>Page</b>
A.	General Operating Conditions .....	III-1
	Container Requirements .....	III-2
	Spills .....	III-2
	Inspections .....	III-4
	Closure .....	III-5
	Waste Acceptance Criteria .....	III-5
	Waste Rejection .....	III-5
	Ignitable Wastes .....	III-5
	Compatibility .....	III-6
	Traffic Control .....	III-6
	Vehicle Idling Requirements .....	III-6
	Storage Restrictions .....	III-6
B.	Waste Management Areas Operating Conditions .....	III-6
	1. Transfer Area .....	III-6
	2. Loading and Unloading Dock Area .....	III-6
	3. Route Truck Parking Area.....	III-8

1111-1111

DRAFT

DRAFT

DRAFT

**SECTION III  
OPERATING CONDITIONS**

**A. GENERAL OPERATING CONDITIONS**

1. The storage and management of wastes at the Facility shall be limited to the Waste Management Areas identified in Section II.A. of this Permit. The Permittee shall utilize the Waste Management Areas for the sole purpose of the activities authorized and the wastes permitted pursuant to Section II.A.
2. The Permittee shall maintain records for each container of waste that arrives at the Facility. The records shall consist of the following information: the container tracking information, customer name, the date the waste was picked up from the customer, the date and time it was transferred to the Transfer Trailer, and the date the container was transferred off-site. The information shall be maintained, either computer based or manual, in the Operating Record of the Facility.
3. The Permittee shall ensure that only Transfer Trailers that meet the secondary containment requirements specified in Section I of this Permit and are owned by Heritage Crystal Clean are allowed to be used in the storage of waste at the Facility and in the transportation of waste to and from the Facility.
4. The Permittee shall ensure that all wastes at the Facility are handled or managed only by personnel who have completed all required training specified in the Personnel Training Plan (Attachment E).
5. The Permittee shall provide, at all times, a safe working environment for employees working in the Waste Management Areas. At a minimum, the Permittee shall ensure that:
  - (a) Adequate ventilation exists in the Waste Management Areas; and
  - (b) Appropriate personnel protective equipment (“PPE”) is utilized, as specified by, but not limited to, Material Safety Data Sheets (“MSDSs”), or by the National Institute for Occupational Safety and Health (“NIOSH”).

Note: the condition above shall not be construed as authorizing the opening or sampling of containers in Waste Management Areas other than for the purposes identified in Section III.B.

6.
  - (a) The Permittee shall operate and maintain the Facility at all times in a manner that allows for the unobstructed movement of personnel and provide immediate access to equipment used for emergency response, waste handling, fire protection, spill control and decontamination measures, all areas of the Facility.
  - (b) The Permittee shall ensure that each container of waste is accessible for retrieval in the event of an emergency at the Facility.
  - (c) The Permittee shall maintain a drum cart, power pallet jack, or fork lift at the Facility to allow for the quick transfer or movement of containers in the event of an emergency.



DRAFT

DRAFT

DRAFT

7. The Permittee shall maintain and keep in good repair all surfaces at the Facility over which vehicles containing waste travel so as to withstand the mechanical stress of traffic to which they are subjected. The surfaces shall be maintained in sufficient condition to minimize damage to containers and spillage of waste during on-site transportation activities.
8. The Permittee shall transport containers of waste on-site using forklifts, hand trucks and/or other equipment or means capable of transporting containers. The transfer of containers shall only be performed by appropriately trained personnel, experienced in the use of such equipment and techniques, as specified in the Personnel Training Plan (Attachment E).

Container Requirements:

9. The Permittee shall ensure that each container of waste is in good condition (i.e., not exhibiting severe rusting/corroding apparent structural defects, bulging). If such inspection reveals that a container is not in good condition or that it may rupture or otherwise leak, the Permittee shall immediately place the container in an over pack container that complies with the requirements of this Permit and all applicable statutes and regulations.
10. The Permittee shall ensure that superfluous waste, foreign materials, liquids, sludges or solids (excluding dried paint, dirt, dust or similar material) that may prevent the safe handling of any container(s) are not present on the exterior of any container at the Facility.
11. The Permittee shall use only DOT approved containers made of or lined with materials that will not react with, and are otherwise compatible with the waste. The Permittee shall ensure that the ability of each container to contain the waste is not impaired.
12. The Permittee shall ensure that all containers of waste stored or managed at the Facility are not opened, handled, managed or stored in a manner which may rupture the container or cause it to leak.
13. The Permittee shall ensure that each container of waste is closed at all times.
14. The Permittee shall ensure that each container of RCRA hazardous waste is labeled or marked clearly with the words "Hazardous Waste" and other words that identify the contents of the container including but not limited to "acid", "alkaline", "cyanide", "halogenated solvent", "flammable", "reactive", or the chemical name.

Spills:

15. The Permittee shall remove spilled or leaked waste(s) or any other liquid that accumulates in the Route Trucks, Transfer Trailers and any Waste Management Area immediately, but no later than twenty-four (24) hours from the time such spill, leak or accumulated liquid is discovered or should have been discovered. The Permittee shall remove spilled or leaked waste or any other liquid immediately if the waste or liquid has the potential of exceeding the secondary containment capacity specified in Section II of this Permit for such area or the waste presents the potential of causing or resulting in a hazard to human health or the environment (e.g., fires, explosions, toxic fumes).

DRAFT

DRAFT

DRAFT

16. The Permittee shall ensure that spilled or leaked waste(s) removed from the Route Truck, Transfer Trailer and Waste Management Areas are managed as a RCRA hazardous waste, unless it is demonstrated that the material is not a RCRA hazardous waste, pursuant to RCRA Section 22a-449(c)-102(a)(1) incorporating 40 CFR 262.11.
17. Any spill report submitted by the Permittee to the DEEP's Emergency Response and Spill Prevention Division for spills at the Facility shall simultaneously be submitted to the DEEP's Waste Engineering and Enforcement Division or its successor. Within fifteen (15) calendar days of providing the spill report noted above, the Permittee shall submit a written report to the Director of the DEEP's Waste Engineering and Enforcement Division or its successor. The Permittee shall maintain copies of all spill reports and all subsequent reports filed with the Department regarding each such spill in the Operating Record for the Facility until closure of the Facility.

Inspections:

18. The Permittee shall inspect the Facility's Waste Management Areas (including the containers) and secondary containment systems of the Route Trucks and Transfer Trailers, associated safety equipment, emergency response equipment, security devices and operating and structural equipment in accordance with the Inspection Schedule Plan (Attachment D) and RCRA Section 22a-449(c)-104(a)(1), incorporating 40 CFR 264.15 and 264.174.
19. The Permittee shall inspect the Facility for malfunctions, deterioration and discharges, which may lead to any release of RCRA or non-RCRA hazardous wastes. The Permittee shall remedy any deterioration which an inspection reveals, to ensure that the problem does not become a potential threat to human health or the environment. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.
20. The Permittee shall record all inspections in a written or electronic inspection log. The inspection logs shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs. These records shall be kept for at least three (3) years in the Operating Record for the Facility or for a longer period of time if a more stringent condition of this Permit applies.

Closure:

21. The Permittee shall close the Facility in accordance with the Closure Plan (Attachment C). When closing or partially closing the Facility, the Permittee must demonstrate that any contaminants remaining after closure will not impact any environmental media including ground water, surface water, sediments, soils, or air in excess of the recommended exposure limits or factors, considering all potential routes of exposure. At a minimum, the closure performance standards for each RCRA and non-RCRA hazardous waste and other materials' constituents of concern shall meet the health risk-based standards for exposure pathways as determined by the Commissioner.

Waste Acceptance Criteria:

DRAFT

DRAFT

DRAFT

22. Prior to the placement of waste into the Loading/Unloading Dock Area, the Permittee shall conduct a hazardous waste verification and waste compatibility evaluation described in the Waste Analysis Plan (Attachment A).
23. For each transfer of waste into the Facility, the Permittee shall, at a minimum, ensure that:
  - (a) Facility paperwork (e.g., an inventory log) has been generated to track each movement of waste at the Facility; and
  - (b) After completing the waste verification activities, the waste shall be moved to the Loading/Unloading Dock Area.

**Waste Rejection:**

24. The Permittee shall ensure that all rejected wastes are segregated and temporarily stored in or on containment pallets or an equivalent self contained secondary containment system. Groups of containers that have been received by the Facility and subsequently rejected, that arrived in the same shipment from the same generator and were documented to be the same waste stream, may share a common secondary containment system.
25. The Permittee shall ensure that all rejected containers of waste are shipped off-site to the generator or a designated facility permitted to accept such waste, no later than twenty four (24) hours from the time of Arrival at the Facility

**Ignitable Wastes:**

26. The Permittee shall not manage any ignitable waste unless the waste is protected from any condition that may cause the waste to ignite.
27. The Permittee shall ensure that no smoking or open flames occur whenever there is a hazard from ignitable or reactive wastes. The Permittee shall prominently display and maintain “No Smoking” signs in each Waste Management Area. Each “No Smoking” sign shall be legible from a distance of twenty-five (25) feet.

**Compatibility:**

28. The Permittee shall ensure that all areas used to manage containers of waste comply with all applicable National Fire Protection Association (NFPA) Guidelines and Occupational Safety and Health Administration (OSHA) General Industries Standards, whichever is more stringent.
29. The Permittee shall verify by review of the manifests or other shipping papers that a transport vehicle does not contain any prohibited wastes and shall ensure that such wastes are removed within twenty-four (24) hours of such waste arriving at the Facility.

**Traffic Control:**

30. The Permittee shall ensure that all transporters that enter the Facility comply with RCRA Sections 22a-449(c)-11 and 22a-449(c)-103 with respect to the transportation of RCRA and non-RCRA hazardous wastes.
31. The Permittee shall control all traffic related to the operation of the Facility in such a way as to mitigate the queuing of vehicles off-site and excessive or unsafe traffic impact in the area where the Facility is located.

DRAFT

DRAFT

DRAFT

Vehicle Idling Requirements:

32. The Permittee shall ensure that pursuant to RCSA Section 22a-174-18(b)(3)(C), trucks shall not be left idling for more than three (3) consecutive minutes, and shall provide notice of this requirement to the operators of truck utilizing the Facility.

Storage Restrictions:

33. The Permittee shall ensure that no waste is stored at the Facility for ten (10) calendar days or longer from the date it arrived at the Facility. The Permittee shall ensure that prior to the end of the operating day on the tenth (10<sup>th</sup>) calendar day, the waste is shipped off-site to the designated facility permitted to accept such waste.
34. The Permittee shall ensure that any or vehicle containing ignitable or reactive waste is located fifty (50) feet or greater from the property line.

DRAFT

DRAFT

DRAFT

**B. WASTE MANAGEMENT AREAS OPERATING CONDITIONS**

**1. TRANSFER AREA**

- (a) The Permittee shall ensure that no containers of waste are staged or stored in this area. This area shall be utilized solely for the purpose of facilitating the truck-to-truck transfer of waste from the Route Trucks to the Transfer Trailer.
- (b) The Permittee shall inspect the Transfer Area in accordance with the Inspection Schedule Plan, included as Attachment D of this Permit. At a minimum, the Transfer Area shall be inspected each operating day for signs of spilled or leaked waste. The results of these inspections and any necessary repairs shall be recorded on an inspection log and maintained as part of the Facility's Operating Record.
- (c) The Permittee shall ensure that any leaking container of waste in the Transfer Area is immediately placed in an overpack container that is in good condition and compatible with the waste.
- (d) The Permittee shall ensure that an emergency response spill kit is located in the Transfer Area to ensure quick containment of RCRA and non- RCRA hazardous wastes in the event of an emergency.

**2. LOADING AND UNLOADING DOCK AREA**

General Operating Conditions:

- (a) The Permittee shall ensure that all Inbound Route Trucks are moved to the Loading and Unloading Dock Area upon Arrival at the Facility, but no later than twenty-four (24) hours after the Arrival of such Route Trucks at the Facility, excluding weekends and legal federal/state holidays.
- (b) The Permittee shall ensure that properly trained facility personnel verify by review of the manifests or other shipping papers, by the end of Each Operating Day which wastes Arrived at the Facility, and that an Inbound Route Truck does not contain any prohibited wastes listed in Section II.B. of this Permit. The Permittee shall ensure that any container of prohibited wastes leaves the Facility within twenty-four (24) hours from the time of discovery.
- (c) The Permittee shall ensure that properly trained facility personnel conduct an inspection of each container on Inbound Route Trucks, within twenty-four (24) hours from the time such waste Arrived at the Facility, to verify that the labels and markings of each container of waste on the trailers and the description of the waste(s) listed on the manifest or shipping papers correspond.

DRAFT

DRAFT

DRAFT

- (d) The Permittee shall ensure that whenever waste is present on a Transfer Trailer in the Loading and Unloading Dock Area, such trailer can immediately be moved by a tractor or other auxiliary power unit. The Permittee shall either maintain such equipment at the Facility or make contractual arrangements for moving the trailers in the event of an emergency.
- (e) The Permittee shall inspect the Loading and Unloading Dock Area in accordance with the Inspection Schedule Plan, included as Attachment D of this Permit. At a minimum, the Loading and Unloading Dock Area shall be inspected each operating day for signs of spilled or leaked waste. The results of these inspections and any necessary repairs shall be recorded on an inspection log and maintained as part of the Facility's Operating Record.
- (f) The Permittee shall ensure that all containers of wastes in the Loading and Unloading Dock Area are compatible in accordance with the requirements of DOT 49 CFR 177.848(e) ("Hazardous Material Load and Segregation Chart").

Containers of waste that are designated with an "X" on the chart shall not be loaded, transported or stored together in the same vehicle, with the exception of wastes that have been given a valid DOT exemption as defined in 49 CFR 171.8.

Containers of waste that are designated with an "O" on the chart may be loaded, transported or stored together provided they are kept separated in such a manner that in the event of a leak from a container, the commingling of hazardous materials will not occur. The requirement for separation will not be applied when processing materials to move into the appropriate storage row or onto a vehicle.

- (g) The Permittee shall ensure that any leaking container of waste in the Loading and Unloading Dock Area is immediately placed in an overpack container that is in good condition and compatible with the waste.
- (h) The Permittee shall ensure that an emergency response spill kit is located in the Loading and Unloading Dock Area to ensure quick containment of RCRA and non- RCRA hazardous wastes in the event of an emergency.
- (i) The Permittee shall ensure that no Outbound Trailer remains on-site for greater than twenty-four (24) hours, unless such a trailer is located in the Loading and Unloading Dock Area and is inspected Each Operating Day until its departure from the Site. Notwithstanding the above, the Permittee shall ensure that no Outbound Trailer remains on-site for greater than seventy-two (72) hours excluding legal state/federal holidays, after waste was first placed on the trailer.

In-Transit Waste:

- (j) The Permittee shall ensure that any trailer containing waste that is not designated for Truck-to-Truck Transfer does not remain on-site for greater than seventy-two (72) consecutive hours after the trailer Arrived at the Facility.
- (k) The Permittee shall comply with RCRA Sections 22a-449(c)-11 and 22a-449(c)-103, 40 CFR 263, 49 CFR 172 and 173, as applicable with respect to the transportation of RCRA and non-RCRA hazardous wastes.

DRAFT

DRAFT

DRAFT

- (l) The Permittee shall ensure that adequate space is maintained between the trailers at the Loading and Unloading Dock Area to enable access between each trailer.
- (m) The Permittee shall ensure that all transportation vehicles containing waste meet the secondary containment requirements for the Route Trucks and Transfer Trailer.

**Truck-to-Truck Transfer Conditions:**

- (n) The Permittee shall ensure that no waste or trailer containing waste that is designated for Truck-to-Truck Transfer remains in the Loading and Unloading Dock Area for greater than ten (10) calendar days from the date the waste or trailer containing waste Arrived at the Facility.
- (o) Prior to placing any container(s) of waste into a truck-to-truck trailer, the Permittee shall visually inspect each container(s) to ensure that such container(s) meet the following criteria:
  - i. The container is properly labeled and marked as required by 40 CFR 262.31 and 262.32;
  - ii. Information on the generator waste profile, manifest or shipping papers corresponds to the information on the label on the container;
  - iii. The container is not damaged or leaking; and
  - iv. The container is tightly closed.

The Permittee shall record the results of these inspections and any corrective action taken on an inspection log and maintain such log a part of the Facility's Operating Record.

- (p) The Permittee shall ensure that trailers used for Truck-to-Truck Transfer are parked in the Loading and Unloading Dock Area whenever transfers of containers of waste are occurring. The Permittee shall ensure that no Truck-to-Truck Transfer is performed in the Route Truck Parking Area.
- (q) The Permittee shall ensure that vehicles designated for Truck-to -Truck Transfer that contain Non-Bulk Containers and Lab Packs of waste are located in the Loading and Unloading Dock Area at all times.
- (r) The Permittee shall ensure that adequate aisle space is maintained between the route trucks and transfer trailers to enable access between each trailer in the event of an emergency.

**3. ROUTE TRUCK PARKING AREA**

**General Operating Conditions:**

- (a) The Permittee shall ensure that Route Trucks located in the Route Truck Parking do not contain any waste. Only Route Trucks containing products or other materials may be located in the Route Truck Parking Area. In addition, oil or vacuum service trucks may be located in this area.
- (b) The Permittee shall comply with RCSA Sections 22a-449(c)-11 and 22a-449(c)-103, 40 CFR 263, and 49 CFR 172 and 173, as applicable.

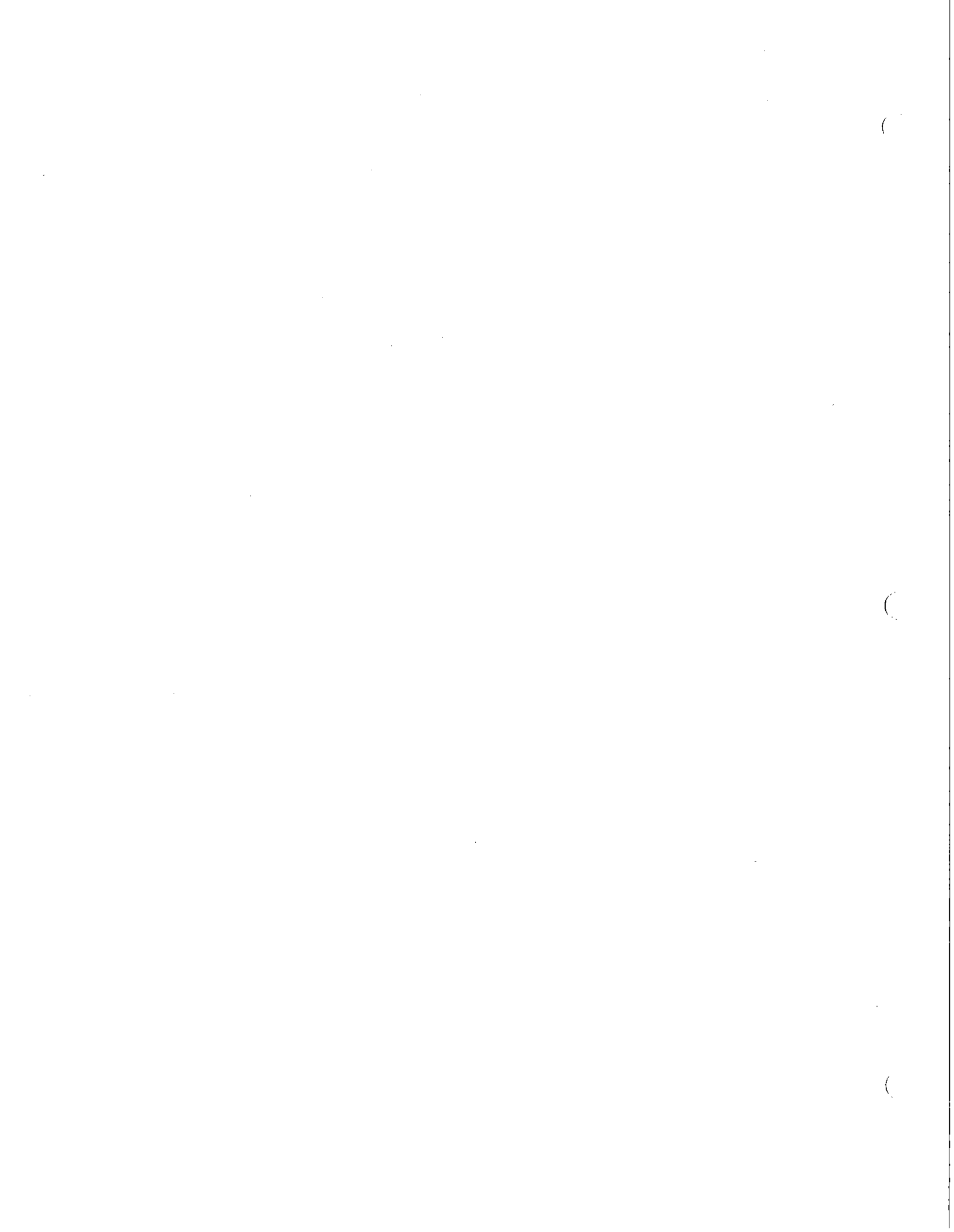
DRAFT

DRAFT

DRAFT

- (c) The Permittee shall inspect the Route Truck Parking Area in accordance with the Inspection Schedule Plan, included as Attachment D of this Permit. At a minimum, the Permittee shall ensure that the Route Truck Parking Area is inspected each operating day for signs of spilled or leaked waste. The Permittee shall record the results of these inspections and any necessary repairs on an inspection log(s) and shall maintain such log(s) in the Facility's Operating Record.
- (d) The Permittee shall ensure that any vehicle that is not designated for Truck-to-Truck Transfer does not remain on-site for greater than seventy-two (72) consecutive hours from its arrival on-site.
- (e) The Permittee shall ensure that any vehicle containing waste that is in transit is parked in the Route Truck Parking Area as identified on Site Plan. Such vehicles are prohibited from entering the Loading and Unloading Dock unless directed by the Emergency Coordinator in response to a release or imminent threat of a release of hazardous wastes. The Emergency Coordinator may relocate any vehicle containing waste as is deemed necessary during an emergency.
- (f) The Permittee shall ensure that adequate aisle space is maintained between the trailers to enable access between each trailer in the event of an emergency.
- (g) The Permittee shall ensure that this area is provided with a sufficiently impervious base.





**SECTION IV**

Hazardous Waste Transfer Facility  
General Facility Conditions

Heritage Crystal-Clean  
94 Murphy Road, Hartford, CT

Permit No. 06401096-CRW

Table of Contents  
Section IV – Operating Conditions

<b>Section</b>	<b>Title</b>	<b>Page</b>
A.	Imminent Hazard Actions .....	IV-1
B.	Waste Analysis Plan .....	IV-1
C.	General Inspection Requirements .....	IV-2
D.	Personnel Training .....	IV-2
E.	Preparedness and Prevention .....	IV-4
F.	Contingency Plan .....	IV-6
G.	Operating Record .....	IV-9
H.	Closure .....	IV-9
I.	Financial Responsibility .....	IV-12
J.	Applicable Law .....	IV-13
K.	Location Standards .....	IV-13

**SECTION IV**  
**General Facility Conditions**

**A. IMMINENT HAZARD ACTIONS**

Notwithstanding any provision of this Permit, enforcement actions may be brought pursuant to CGS Section 22a-6, or any other applicable law.

**B. WASTE ANALYSIS PLAN**

1. The Permittee shall follow the procedures described in the Waste Analysis Plan, included as Attachment A of this Permit. The Permittee shall keep the Waste Analysis Plan approved by the Commissioner at the Facility at all times until Final Closure of the Facility.
2. The Permittee shall ensure that prior to the receipt of any non-bulk containers or lab-pack containers of waste at the Facility such containers have been pre-approved in accordance with the Waste Analysis Plan. Upon receipt, the Permittee shall review the manifest and/or bill of lading to ensure that no prohibited wastes, identified in Section II of this Permit, are present.
3. The Permittee shall maintain in writing and/or in an electronic format (that can be easily accessed or reproduced) generator waste profile sheets, hazardous waste manifests, bills of lading or other shipping papers and all records, documents or other information required to demonstrate compliance with the Waste Analysis Plan in the Facility's Operating Record. This specifically includes, but is not limited to:
  - (a) Hazardous waste manifests, bills of lading or other shipping papers and analytical documentation for each waste stream stored at the Facility as required by the Waste Analysis Plan; and
  - (b) Compatibility demonstration(s) for wastes stored within the Loading/Unloading Dock Area that are in accordance with the procedures in the Waste Analysis Plan and detailed in the DOT Segregation Table for Hazardous Materials (49 CFR 177.848).
4. The Permittee shall re-evaluate and revise the generator waste profile sheets whenever:
  - (a) The generator notifies the Permittee that they have modified the process or operation of an activity that generates such waste. The Permittee shall obtain a new waste profile and/or waste characterization from the generator for such waste stream prior to receiving such waste from the generator;
  - (b) The Permittee or destination facility determines that the waste does not conform to the approved waste profile; or
  - (c) There is a regulatory revision, which affects the classification or management of the waste.
5. The Permittee shall at all times have available for inspection and review by the DEEP copies of all records, forms, procedural documents, manuals and any other related documentation, used to achieve compliance with the Waste Analysis Plan.

**C. GENERAL INSPECTION REQUIREMENTS**

In addition to any other inspection requirements specified in this Permit, the Permittee shall:

1. Perform inspections of the Facility in accordance with the Facility Inspection Schedule, included as Attachment D of this Permit. The Permittee shall maintain a copy of the current Facility Inspection Schedule approved by the Commissioner at the Facility at all times;
2. Inspect the Facility for malfunctions and deteriorations and discharges, which may be causing or may lead to:
  - (a) Releases of RCRA and non-RCRA hazardous waste(s) or constituent(s) to the environment; or
  - (b) A threat to human health;
3. Remedy any deterioration or malfunction of equipment or structures, which the inspection reveals, on a schedule which ensures that the problem does not lead to a hazard to the environment or human health. Where a hazard is imminent or has already occurred, corrective actions shall be taken immediately; and
4. Ensure that records of inspections are maintained at the Facility at all times; and contains the information and are on the forms prescribed by the Facility Inspection Schedule. The records pertaining to inspections, corrective actions and repairs resulting from such inspections shall be kept for at least five (5) years from the date of inspection.

**D. PERSONNEL TRAINING**

1. The Permittee shall conduct personnel training in all of the elements outlined in the Personnel Training Plan, included as Attachment E of this Permit. The Permittee shall train all facility personnel to ensure that the performance of their duties ensures that the Facility remains in compliance with the requirements of this Permit. The Permittee shall maintain a copy of the Personnel Training Plan, including the program for the annual review, approved by the Commissioner at the Facility at all times.
2. The Permittee shall ensure that the Personnel Training Plan includes, but is not limited to, the following:
  - (a) Implementation of the Facility's Contingency Plan of this Permit;
  - (b) The activities authorized and prohibited by this Permit;
  - (c) The permitted and prohibited wastes contained in this Permit;
  - (d) The communications or alarm systems at the Facility;
  - (e) The requirements of the Waste Analysis Plan and the Protocol for Receipt of Waste, Section II.B of this Permit;
  - (f) The hazards associated with and the safe handling practices for all of the wastes authorized to be managed at the Facility;
  - (g) The selection and use of proper personnel protection equipment and emergency equipment;
  - (h) The container marking, labeling and inspection requirements of this Permit;
  - (i) Training in emergency response procedures, including but not limited to, routes of exposure associated with any release, and relevant technical information (i.e., Material Safety Data Sheets) regarding any waste authorized to be managed at the Facility;

- (j) Requirements regarding the review and use of manifests, bills of lading or other required shipping papers;
  - (k) Requirements regarding the management of RCRA and non-RCRA hazardous wastes;
  - (l) On the job training and instruction given to facility personnel regarding the safe handling and the management procedures of authorized wastes managed at the Facility that are relevant to each job position;
  - (m) The U.S. DOT's hazardous material classification, marking, labeling and placarding requirements for the wastes managed at the Facility; and
  - (n) The requirements of the DOT Segregation Table for Hazardous Material (49CFR 177.848).
3. The Permittee shall ensure that facility personnel successfully complete the training required by this Permit within six (6) months after the effective date of their employment or assignment to the Waste Management Area or to a new position in the Facility, whichever is sooner. The Permittee shall ensure that untrained personnel do not handle, manage or become involved in activities involving RCRA and non-RCRA hazardous waste. Personnel shall not work in unsupervised positions until they have completed the training required by this Permit.
4. The Permittee shall ensure that all facility personnel receive and successfully complete an annual review of the Personnel Training Plan within three hundred and sixty-five (365) calendar days of the date initial training, or the previous year's annual review of the training program.
5. The Permittee shall maintain the following documents and records in its Operating Record at the Facility:
- (a) The job title for each position related to the operation of the Facility and the name of the employee filling each position;
  - (b) A written job description for each position listed under Condition No. IV.D.5.(a). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications, and duties of employees assigned to each position;
  - (c) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under Condition No. IV.D.5.(a); and
  - (d) Records documenting that the training or job experience as specified in the Personnel Training Plan has been given to, and completed by Facility personnel.
6. The Permittee shall keep training records on current personnel until Final Closure of the Facility. Training records on former employees shall be kept for at least three (3) years from the date the employee last worked at the Facility. Personnel training records may accompany personnel transferred within the same company.
7. The Permittee shall ensure that the training program is directed by a person trained in hazardous waste management procedures or other relevant procedures (e.g., Hazard Communication) and that the program includes instructions teaching Facility personnel hazardous waste management procedures relevant to the positions in which they are

employed.

**E. PREPAREDNESS AND PREVENTION**

1. The Permittee shall maintain and operate the Facility so as to prevent fires, explosions, or any unplanned sudden or non-sudden release of RCRA and non-RCRA hazardous waste(s) or waste constituent(s) thereof to or from the Waste Management Areas to the air, soil, surface water or ground water.
2. The Permittee shall ensure that the emergency equipment specified in the Facility's Contingency Plan, included as Attachment B of this Permit, is available at all times. The Permittee shall provide the location of all the emergency equipment as shown or described in the Contingency Plan.
3. The Permittee shall ensure that the Facility's communication systems, alarm systems, fire protection equipment, emergency equipment, spill control equipment and decontamination equipment are immediately accessible and operate properly at all times. The Permittee shall inspect and test such equipment in accordance with all applicable laws, regulations, ordinances and the Facility Inspection Schedule. The Permittee shall maintain in the Facility Operating Record written records indicating the date and time of each inspection, the name of the inspector, the results of the testing of the equipment noted above, any action(s) taken in response to such testing and the date and nature of any necessary corrective measures.
4. The Permittee shall ensure that whenever RCRA and non-RCRA hazardous waste is being moved, or otherwise managed at the Facility, all personnel involved have immediate access to an internal alarm or emergency communication device, either directly or through visual or verbal communication with other facility personnel. In the event that only one employee is engaged in waste management activities, the Permittee shall ensure that this person has immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio capable of summoning external emergency assistance.
5. The Permittee shall, within thirty (30) calendar days of issuance of this Permit, send by certified mail, return receipt requested, copies of the approved Contingency Plan to all police departments, fire departments, hospitals and emergency response teams in the vicinity of the Facility, including, but not limited to:
  - (a) City of Hartford Police Department;
  - (b) City of Hartford Fire Department;
  - (c) Hartford Hospital;
  - (d) The Local Emergency Planning Committee for Hartford; and
  - (e) Each emergency response contractor who has a contract with the Permittee to provide emergency response services at the Facility.

Whenever any changes occur in the Facility layout or operation, or in the Contingency Plan itself, which materially affects implementation or execution of the Contingency Plan, the Permittee shall, within fifteen (15) calendar days of the approval of a modification to this Permit or within fifteen (15) calendar days of such change if no permit modification is needed, send by certified mail, return receipt requested, to all police departments, fire

departments, hospitals and emergency response teams in the vicinity of the Facility, including but not limited to, those listed above, the revisions to the Contingency Plan or a revised Contingency Plan.

6. The Permittee shall ensure that each entity under contract to provide emergency response services at the Facility has a permit, issued by the Commissioner pursuant to CGS Section 22a-454, authorizing such entity to provide emergency response services. The Permittee shall maintain a copy of such permit in the Operating Record for its Facility. The Permittee shall ensure that any action(s) taken by an entity (including such entity's officers, employees, agents and subcontractors) providing emergency response services at its Facility conforms to the requirements of this Permit.
7. The Permittee shall ensure that each entity under contract with the Permittee to provide emergency response services visits the site once each calendar year so that such entity is familiar with the Permittee's site and can respond to an emergency. The Permittee shall ensure that each entity becomes familiar and maintains familiarity with the Contingency Plan for the Facility, including any amendments thereto, approved by the Commissioner. At a minimum, each entity shall become and maintain familiarity with:
  - (a) The Facility layout, alarm systems and emergency equipment;
  - (b) The properties of the wastes and products which are or may be at the Facility and the health hazards associated with such wastes and products;
  - (c) The location of Facility personnel;
  - (d) Entrances to and exits from the Facility and the Waste Management Areas; and
  - (e) Evacuation routes, and the contacts for all persons or entities that might provide emergency response services at the Facility.

The Permittee shall maintain in the Operating Record for its Facility a certification, attested to by each emergency response entity under contract with the Permittee to provide emergency response services, stating that such entity has complied with the requirements specified in this condition.

8. The Permittee shall invite the police department, fire department, hospital and governmental emergency response teams listed in Condition No. IV.E.5. to visit the Facility and shall attempt to make other arrangements so as to enable each entity to respond to an emergency at the site. At a minimum, the Permittee shall provide each entity with information specified in Condition No. IV.E.7. The Permittee shall maintain in the Facility's Operating Record records demonstrating compliance with the requirements specified in this condition, including any records it receives in response to actions under this condition.

**F. CONTINGENCY PLAN**

1. The Permittee shall maintain the most recent version of the Contingency Plan, included as Attachment B of this Permit, which has been approved by the Commissioner, at the Facility. The emergency coordinator, alternate emergency coordinator(s), and any other personnel involved in the Contingency Plan implementation shall receive copies of the Contingency Plan and all modifications or updates to the Contingency Plan along with a brief explanation of the changes.



2. The Permittee shall immediately amend the Contingency Plan in accordance with the permit modification procedures specified in Condition No. I.E.6. whenever:
  - (a) The Contingency Plan fails in an emergency;
  - (b) The Facility changes its design, construction, operation, maintenance or changes the response measures that must be taken in an emergency;
  - (c) A modification to the list of emergency coordinators is necessary; or
  - (d) A modification to the list and location of emergency equipment is necessary.

The Contingency Plan changes specified in Condition No. IV.F.2. of this Permit are mandatory; however, the Permittee may submit to the Department, in writing, a request to make any other changes to the Contingency Plan. These requested modifications should be submitted with an application, accompanied by the appropriate fee, for a permit modification.

3. The Permittee shall ensure that the provisions of the Contingency Plan are carried out and follow the emergency procedures described in the Contingency Plan, whenever there is an emergency event such as fire, explosion, or any sudden or non-sudden release of waste or waste constituent(s) thereof which threatens or may potentially threaten human health or the environment.
4. The Permittee shall ensure that at all times, there shall be at least one employee on the Facility premises or on call to respond to an emergency event by reaching the Facility within a short period of time, and has the responsibility for coordinating all emergency response measures. The Emergency Coordinator shall be thoroughly familiar with all aspects of the Facility's Contingency Plan, all information and activities necessary to respond to an emergency, and have the authority to commit the resources needed to implement the Contingency Plan. The Permittee shall ensure that up to date waste characterization data and/or shipping papers, are available to the Emergency Coordinator or designee on a 24 hour-a-day, on a 7 day-a-week basis.
5. Whenever there is an imminent or actual emergency, the Emergency Coordinator (or designee) shall immediately:
  - (a) Activate internal facility alarms or communication systems, where applicable, to notify all Facility personnel of an emergency;
  - (b) Notify appropriate state or local agencies and or private emergency response providers with designated response roles if their help is needed;
  - (c) Identify the character, location, source, amount and extent of any waste or any constituent(s) thereof which have been or may be released. The emergency coordinator may do this by observation, review of facility records, and, if necessary, by chemical analysis; and
  - (d) Assess possible hazards to human health or the environment that may result from the emergency event. This assessment shall consider both direct and indirect effects of the emergency event (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fires or heat-induced explosions).

6. If the Emergency Coordinator determines that the Facility has had an emergency event that threatens or may potentially threaten human health or the environment, the Permittee shall report the findings as follows:
  - (a) If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, the Permittee shall immediately notify local and state authorities. The Emergency Coordinator shall be available to assist local and state officials in the decision whether local areas should be evacuated;
  - (b) The Commissioner shall be immediately notified using the 24-hour emergency spill response number (1-866-337-7745), the alternate number (860-424-3338), or such other number that may be specified by the Commissioner, and provide verbally the information specified in Condition No. IV.F.6.(c); and
  - (c) As required by federal law, notify either the government official designated as the on-scene coordinator for the geographical area (in the applicable regional contingency plan under 40 CFR 1510) or the National Response Center using the 24-hour toll free number (1-800-424-8802). The notification shall include:
    - i. Name and telephone number of the notifier;
    - ii. Name and address of the Facility;
    - iii. Time and type of incident (e.g., release, fire, explosion);
    - iv. Name and quantity of waste(s) or constituents thereof involved, to the extent known;
    - v. The extent of injuries, if any; and
    - vi. The possible hazards to human health or the environment.
7. During an emergency, the Emergency Coordinator shall take all necessary measures to ensure that fires, explosions and releases do not occur, re-occur, or spread. These measures shall include but are not limited to: the cessation of operations, the containment and collection of released wastes or any constituent(s) thereof; and the removal or isolation of containers of wastes or vehicles containing waste.
8. The Permittee shall ensure that the generator waste profile sheets, prequalification information, Material Safety Data Sheets (MSDSs), manifests, bills of lading and/or shipping papers are available to the Emergency Coordinator or designee on a twenty-four (24) hour-a-day, seven (7) day-a-week basis.
9. If operations are suspended in response to an emergency event, the Emergency Coordinator shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, containers or other equipment, where and when appropriate.
10. Immediately after an emergency, the Emergency Coordinator shall provide assistance to the emergency responders for either storing or disposing of recovered waste or any constituent(s) thereof, contaminated soil, surface water or any other material that results from a release, fire or explosion or other emergency event at the Facility.
11. The Emergency Coordinator shall ensure that, in the affected area(s) of the Facility:
  - (a) No wastes that may be incompatible with any recovered waste, contaminated soil, surface water or any other material that results from a release is stored in the same Waste Management Area;
  - (b) Any wastes resulting from a spill or from emergency response actions shall be

- managed in accordance with the requirements of the Waste Analysis Plan and all applicable state and federal statutes and regulations; and
- (c) All emergency equipment listed in the Contingency Plan is resupplied, or cleaned and fit for its intended use before operations are resumed.
12. The Permittee shall note in the Operating Record the time, date and details of any incident that requires implementation of the Contingency Plan. Within fifteen (15) calendar days after the incident, a written report on the incident shall be submitted to the Commissioner. The report shall include:
- (a) Name, address, and telephone number of the Permittee;
  - (b) Name, address, and telephone number of the Facility;
  - (c) Date, time, and type of incident (e.g., fire, explosion, release);
  - (d) Description of the emergency event and its cause;
  - (e) Name and quantity of waste or constituent(s) thereof involved;
  - (f) The extent of injuries, if any;
  - (g) An assessment of actual or potential hazards to human health or the environment, where this is applicable;
  - (h) Estimated quantity and disposition of recovered material that resulted from the incident and all response actions taken or to be taken;
  - (i) All corrective measures taken or to be taken in response to the incident; and
  - (j) All corrective measures taken or remain to be taken to ensure that the incident does not happen again.
13. The Permittee must notify the Commissioner, in addition to state and local authorities involved in responding to an emergency, that Condition No. IV.F.11. has been completed before resuming operations in the affected area(s) of the Facility.
14. The Permittee shall maintain an up-to-date inventory of all wastes and materials on-site. This inventory shall identify all wastes and other materials in each Waste Management Area.

**G. OPERATING RECORD**

1. The Permittee shall maintain, in writing and/or in an electronic format (that can be easily accessed or reproduced), the following information in the Facility's Operating Record, until Final Closure of the Facility:
- (a) A description including the quantity of each RCRA and non-RCRA hazardous waste received, and the date(s) of its storage at the Facility; This information shall include cross-references to a specific shipping papers or manifest number, if the waste was accompanied by a manifest;
  - (b) Summary reports and details of all incidents that require implementation of the Contingency Plan, as specified in Condition No. IV.F.12.;
  - (c) Records and results of inspections required by this Permit and the Facility Inspection Plan. The records and results of such inspections shall be kept for the preceding five (5) years from the date of such inspection;
  - (d) All closure documentation as specified in Condition Nos. IV.H.1. through 10.;
  - (e) All closure cost estimates consistent with the requirements of RCOSA Section 22a-449(c)-104(a)(1), incorporating 40 CFR 264.142, and RCOSA Section 22a-449(c)-104(b);

- (f) Training documentation and records as specified in Condition No. IV.D.5.; and
- (g) Any other information required by this Permit or any applicable law to be maintained in the Facility's Operating Record (e.g., waste characterization data, manifest data).

#### **H. CLOSURE**

1. The Permittee shall close the Facility in a manner that:
  - (a) Minimizes the need for further maintenance;
  - (b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, the escape of RCRA and non-RCRA hazardous waste, RCRA and non-RCRA hazardous constituents, leachate, contaminated run-off, or RCRA and non-RCRA hazardous waste decomposition products to the soil, ground water or surface waters or to the atmosphere; and
  - (c) Complies with the closure requirements specified in 40 CFR 264 Subparts G and I applicable to containers for each waste management area.
2. The Permittee shall have a written Closure Plan developed in accordance with the requirements of RCRA Section 22a-449(c)-104(a)(1) incorporating 40 CFR 264. A copy of the Permittee's most current Closure Plan approved by the Commissioner is shall be kept at the Facility until Final Closure is completed and certified in accordance with Condition No. IV.H.10 of this Permit. A copy of the most current Closure Plan shall be furnished to the Commissioner upon request and shall be provided during site inspections (on the day of inspection) to any officer, employee or representative of the DEEP. The issuance of this Permit shall not be deemed or construed as an approval of any Closure Plan submitted by the Permittee.
3. The Permittee's Closure Plan shall contain all the information specified in 40 CFR 264.112(b), except that wherever the term "hazardous waste" is used in 40 CFR 264.112(b), it shall mean "waste" as that term is defined in this Permit, and where the term "hazardous waste management unit" is used in 40 CFR 264.112(b), it shall mean "waste management unit" as that term is defined in this Permit.
4. The Permittee shall amend the Closure Plan for the Facility whenever:
  - (a) A change in operating plans or Facility design affects the Closure Plan;
  - (b) There is a change in the expected year of closure;
  - (c) In conducting partial or Final Closure activities, unexpected events require a modification of the approved Closure Plan; or
  - (d) New or additional information becomes known which requires a modification of the Closure Plan.

The Permittee shall amend the Closure Plan at least sixty (60) calendar days prior to the change in operating plans or facility design, or no later than sixty (60) calendar days after an unexpected event has occurred which has affected the Closure Plan. This requirement to amend the Closure Plan is in addition to and shall not relieve the Permittee of its obligation to comply with the permit modification procedures specified in Condition No. I.E.6. regarding any changes in an operating plan for or design of the Facility. If an unexpected event occurs during the partial or Final Closure period, the Permittee shall submit a proposed amendment to the Closure Plan to the Commissioner no later than thirty (30) calendar days after the unexpected event. Any such proposed amendment

shall constitute and be treated as a request to amend this Permit.

5. The Permittee shall notify the Commissioner in writing at least ninety (90) calendar days prior to the date it expects to begin either partial or Final Closure of the Facility and shall submit the Closure Plan for the Facility to the Commissioner with such notice. The date the Permittee “expects to begin closure” shall be no later than thirty (30) calendar days after the date on which any Waste Management Area receives the known final volume of RCRA and non-RCRA hazardous wastes.

If there is a reasonable possibility that the Waste Management Area will receive additional RCRA and non-RCRA hazardous wastes, the Permittee shall fully explain in writing such possibility and maintain a copy of such explanation in the Operating Record of the Facility. This shall be submitted no later than one year after the date on which the Waste Management Area receives the most recent volume of hazardous waste.

6. The Permittee shall submit a revised or updated Closure Plan for the Facility to the Commissioner no later than fifteen (15) calendar days after issuance of a judicial decree or final administrative order requiring the Permittee to cease the receipt of waste or to close the Facility.
7. The Commissioner will provide notice, that conforms to the requirements specified in CGS Section 22a-6h, regarding the Permittee’s Closure Plan submitted pursuant to Condition No. IV.H.2. of this Permit. Comments on the Permittee’s Closure Plan shall be accepted for up to thirty (30) calendar days from the date of publication of the newspaper notice. At the discretion of the Commissioner, a public meeting or hearing may be held regarding the Permittee’s proposed Closure Plan.

At the end of the public comment period, the Commissioner may approve the Permittee’s Closure Plan with or without conditions as the Commissioner deems necessary. If the Commissioner approves the Permittee’s Closure Plan, the approved plan with any conditions deemed necessary by the Commissioner will become a condition of this Permit. If the Commissioner does not approve the proposed Closure Plan, a detailed statement of reasons for such refusal shall be provided to the Permittee. The Permittee must modify or submit a new Closure Plan within thirty (30) calendar days of receiving such written statement. The Commissioner shall then approve or modify in writing the Closure Plan resubmitted by the Permittee. If the Commissioner modifies the plan, this modified plan will become the approved Closure Plan and become a condition of this Permit. A copy of the modified plan with a detailed statement of reasons for the modifications shall be provided to the Permittee.

8. (a) Within ninety (90) calendar days of the approval of the Permittee’s Closure Plan, pursuant to Condition No. IV.H.8., or ninety (90) calendar days after receiving the final volume of waste at the Facility or a Waste Management Area, whichever is later, the Permittee shall remove from the Waste Management Area or facility, as applicable, all waste in accordance with the approved Closure Plan. The Commissioner may approve a longer time period if the Permittee demonstrates to the Commissioner’s satisfaction that the activities required to comply with the approved Closure Plan will of necessity take longer than ninety (90) calendar days

to complete, and that the Permittee has taken and will continue to take all steps necessary to prevent threats to human health and the environment. Any demonstration by the Permittee shall be made at least thirty (30) days before the expiration of the ninety (90) calendar day period.

- (b) The Permittee shall complete partial and final closure activities, as applicable, in accordance with the approved Closure Plan approved by the Commissioner within one hundred and eighty (180) calendar days after such approval or within one hundred and eighty (180) calendar days after receiving the final volume of waste at the Facility or a Waste Management Area, whichever is later. The Commissioner may approve a longer period for closure if the Permittee demonstrates to the Commissioner's satisfaction that the activities required to comply with the approved Closure Plan will of necessity take longer than one hundred and eighty (180) calendar days to complete, and that the Permittee has taken and will continue to take all steps necessary to prevent threats to human health and the environment and will comply with any additional conditions deemed necessary by the Commissioner arising from the partial or Final Closure. Any demonstration by the Permittee shall be made at least thirty (30) calendar days before the expiration of the one-hundred and eighty (180) calendar day period.
- (c) All waste generated by the Permittee during partial or Final Closure shall be managed in accordance with all applicable statutes and regulations.

- 10. Within sixty (60) calendar days of the completion of partial or Final Closure of the Facility or any Waste Management Area, the Permittee shall submit to the Commissioner by registered mail, a certification signed by both the Permittee and by an independent, registered professional engineer, licensed to practice in the state of Connecticut, stating that the Waste Management Area or the Facility, as applicable, have been closed in accordance with the specifications of the approved Closure Plan. Documentation supporting the independent, registered professional engineer's certification shall be furnished to the Commissioner upon request, until the Commissioner releases the Permittee from the financial assurance requirements for closure under Condition No. IV.I.5.

#### **I. FINANCIAL RESPONSIBILITY**

- 1. The Permittee shall submit for the Commissioner's review and written approval written estimate(s) of the cost of performing closure of the Facility in accordance with the requirements of this Permit. The Permittee shall ensure that such written estimate(s) are prepared in accordance with the methodology specified in RCSA 22a-449(c)-104 incorporating 40 CFR 264.142(a) and 264.144(a), as applicable.

Note: A fifteen (15%) percent contingency shall be applied to the estimate for unforeseeable elements or events which may increase the cost of performing closure.

- 2. The Permittee shall establish and continuously maintain financial assurance using one or more of the instrument formats prescribed by the Commissioner for Final Closure of the Facility. The Permittee shall maintain financial assurance in effect until the Commissioner notifies the Permittee in writing that it is no longer required to maintain such mechanism

for financial assurance, as provided for in Condition No. IV.I.5.

3. The Permittee shall adjust the amount of financial assurance to reflect inflationary costs as required by RCSA 22a-449(c)-104 incorporating 40 CFR 264.142, and any factors that bear on the cost of performing the work that remains to be completed under this Permit. Adjustments shall be made each year, on the anniversary of the establishment of the mechanism(s) for financial assurance until the Commissioner releases the Permittee from financial assurance requirements of this Permit.

The latest adjusted cost estimate(s) shall be kept at the Facility and a signed original shall be submitted to the Commissioner within fourteen (14) calendar days of preparation.

4. Upon request by the Permittee, the Commissioner may approve periodic reductions in the amount of financial assurance commensurate with the completion of closure activities. Such request shall include a revised cost estimate and demonstration of completed work activities which equates to at least a fifteen (15%) percent reduction in the estimate cost.
5. Within sixty (60) calendar days after receiving the certification(s) submitted pursuant to Condition No. IV.H. 11. that Final Closure of the Facility has been completed in accordance with the approved Closure Plan, the Commissioner will notify the Permittee in writing that it is no longer required to maintain financial assurance for the Final Closure of the Facility, unless the Commissioner has reason to believe that Final Closure has not been performed and/or completed in accordance with the approved Closure Plan. The Commissioner shall provide the Permittee with a detailed written statement of any such reason(s) to believe that closure has not been performed and/or completed in accordance with the approved Closure Plan.
6. The Permittee shall establish and continuously maintain liability coverage for sudden accidental occurrences at the Facility in the amount and manner specified in RCSA 22a-449(c)-104 incorporating 40 CFR 264.147(a). The Permittee shall ensure that the wording of the liability insurance secured for the purposes of compliance with this Permit is identical to the wording specified in 40 CFR 264.151, except that all references to the "Regional Administrator of EPA" shall be changed to the "Commissioner of DEP". The Permittee shall maintain in effect such liability coverage until the Commissioner notifies the Permittee in writing that maintaining such coverage is no longer required.
7. Within sixty (60) calendar days after receiving certifications pursuant to Condition No. IV.H. 11. that Final Closure of the Facility has been completed in accordance with the approved Closure Plan, the Commissioner will notify the Permittee in writing that it is no longer required to maintain liability coverage for the Facility, unless the Commissioner has reason to believe that Final Closure has not been in accordance with the approved Closure Plan. The Commissioner shall provide the Permittee with a detailed written statement of any such reason(s) to believe that closure has not been in accordance with the approved Closure Plan.
8. The Permittee shall comply with the requirements specified in 40 CFR 264.148 in the event of incapacity of the Permittee, guarantors or financial institutions.

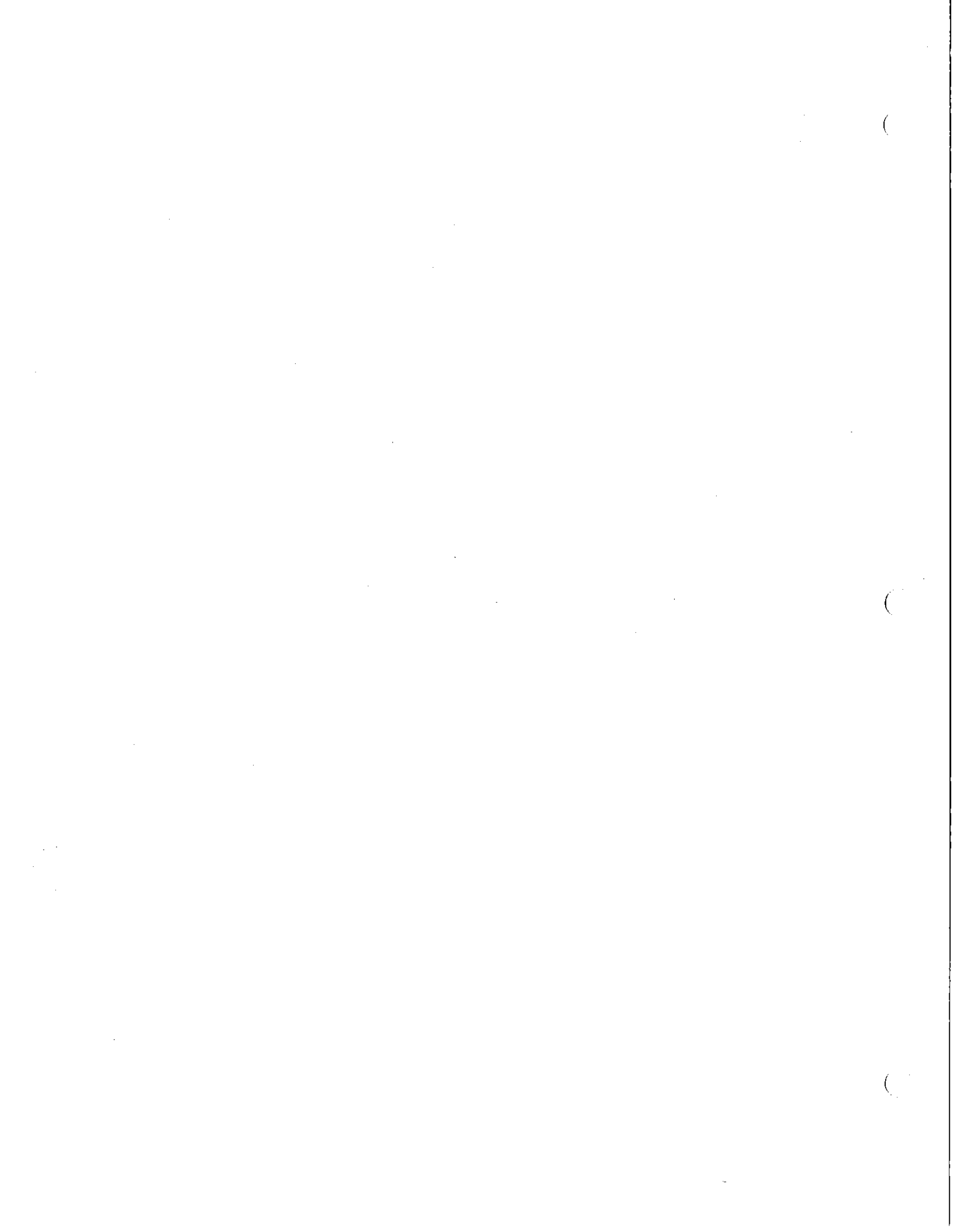
**J. APPLICABLE LAWS**

Even if not specified in this Permit, the Permittee shall comply with all applicable federal, state, and local laws.

**K. LOCATION STANDARDS**

The Permittee shall ensure that the Facility complies with the requirements of 40 CFR 264.18. If the Permittee determines that the Facility does not comply with the notification of these requirements, the Permittee shall notify the Commissioner. Based upon such non-compliance, the Commissioner may take whatever action is deemed appropriate.





**SECTION V**

Hazardous Waste Transfer Facility  
Compliance Schedule

Heritage Crystal-Clean  
94 Murphy Road, Hartford CT

Permit No. 06401096-CRW



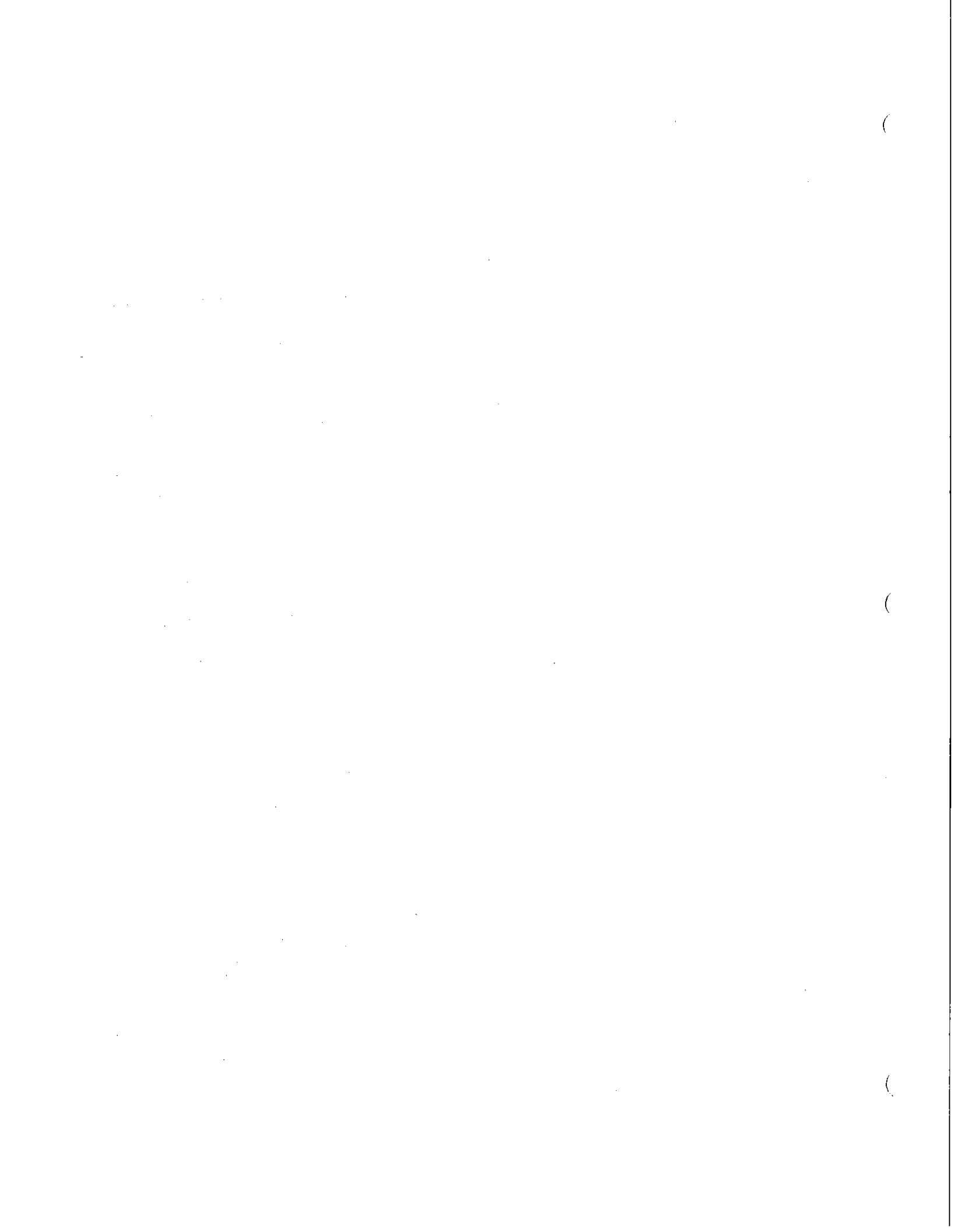
**SECTION V**  
**Compliance Schedule**

- A. All requirements set forth in the conditions in Section V.A. of this Permit shall be conducted within thirty (30) calendar days of the effective date of this Permit, otherwise, the Permittee may be subject to revocation of this Permit and therefore required to cease all Permitted activities upon receipt of written notification by the Commissioner.
1. The Permittee shall retain a qualified consultant acceptable to the Commissioner and shall, notify the Commissioner in writing of the identity of such consultant. Any such consultant shall be qualified to review compliance with regulations promulgated under Section 22a-449(c) of the CGS.  
  
The Permittee shall retain such consultant for the duration of this Permit and, within ten (10) days after retaining any consultant other than the one originally identified under this condition, the Permittee shall notify the Commissioner in writing of the identity of such other consultant. Such consultant will be required to submit annual reports detailing the Permittee's compliance with the requirements of this Permit and all applicable provisions of RCSA Sections 22a-449(c)-100 through 119. The Permittee shall submit to the Commissioner a description of the consultant's education, experience and training, which is relevant to the work required under this Permit, within ten (10) days after a request for such a description. Nothing in this condition shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.  
  
The Permittee shall, prior to the Commissioner's approval of the consultant named pursuant to Condition No. V.A.1. of this Permit, certify to the Commissioner that such consultant: (i) is not a subsidiary or affiliated with the corporation; (ii) does not own stock in Triumvirate Environmental, Inc, or any parent, subsidiary, or affiliated corporation; (iii) has not participated in any contractual agreements with the Permittee or any parent, subsidiary, or affiliated corporation, which, in the Commissioner's judgment would affect the consultant's ability to exercise the independent judgment and discipline required to conduct the compliance audit(s); (iv) have no other direct financial stake in the outcome of the compliance audit(s) outlined in this Permit; and (v) have expertise and competence in environmental auditing and the regulatory program being addressed through the issuance of this Permit.
  2. The Permittee shall notify the Commissioner in writing the names of the individuals that the Permittee has designated as the primary and secondary emergency coordinators for the Facility.
- B. All requirements set forth in the conditions of Section V.B. of this Permit shall be conducted within sixty (60) calendar days of the effective date of this Permit; otherwise, the Permittee may be subject to revocation of this Permit and therefore required to cease all Permitted activities upon receipt of written notification by the Commissioner.
1. The Permittee shall submit for the Commissioner's review and written approval documentation demonstrating that the current mechanism for financial assurance for closure has been revised, and/or an additional mechanism(s) has been established, such that the value of the mechanism(s) is at least sixty six thousand two hundred seventy eight

dollars (\$66,278.00) The value of the mechanism(s) may be less than the above figure only if an alternate amount has been approved in writing by the Commissioner. Documentation demonstrating compliance with this provision will depend on the type of financial assurance mechanism used, and must comply with the requirements of 40 CFR 264 subpart H as incorporated by the RCSA.

- C. All requirements set forth in the conditions of Section V.C. of this Permit shall be conducted within ninety (90) days of the effective date of this Permit; otherwise, the Permittee may be subject to revocation of this Permit and therefore required to cease all Permitted activities upon receipt of written notification by the Commissioner.
1. The Permittee shall ensure that the qualified consultant retained pursuant to Condition No. V.A.1. of this Permit submits to the Commissioner a compliance audit report detailing the Permittee's compliance with the requirements of this Permit. The report shall be submitted for the Commissioner's written review and approval within ninety (90) days from the effective date of this Permit and annually (within fifteen (15) days of the anniversary date of the original audit) thereafter. The compliance audits shall be subject to the following conditions:
- a) The compliance audits shall consist of a thorough and complete assessment of the Permittee's compliance with RCSA Sections 22a-449(c)-100 through 119 incorporating 40 CFR Parts 260 through 279 and the terms and conditions of this Permit.
  - b) The results of each compliance audit shall be summarized in a report, which shall be submitted for the Commissioner's review and written approval no later than forty-five (45) days after the completion date of the compliance audit. The format of the compliance audit for the assessment of hazardous waste management compliance, the inspection checklist developed by the Department of Environmental Protection, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, with supplemental documentation as necessary. Each report shall describe in detail the Permittee's compliance with the regulations specified in Section V.B.1.(a) if this Permit as well as the terms and conditions of this Permit, shall identify all violations of those regulations, and/or terms and conditions of this Permit. The report shall also describe actions taken by the Permittee to correct violations identified during each compliance audit. As soon as possible, but no later than thirty (30) days after the completion of each compliance audit, the Permittee shall correct any violations found during the compliance audit. If the Permittee determines that the correction of any violation(s) will require more than thirty (30) days to complete, the audit report shall include a detailed written plan for correcting the violation(s), including but not limited to, a schedule to complete the corrective measures. Each report shall also include the Permittee's certification of compliance with the regulations, and terms and conditions of this Permit, and documentation demonstrating such compliance. In cases where multiple counts of the same violation are discovered, the report shall include a listing in the compliance audit report, including but not limited to:
    - (i) The names of those individuals who conducted the compliance audit;
    - (ii) The areas of the Facility inspected;
    - (iii) The records reviewed to determine compliance; and
    - (iv) A summary of completed forms used to record all observations.

- c) The Commissioner reserves the right to pursue enforcement action against the Permittee for violations discovered during the compliance audit process. Performance of these audits shall not limit the Commissioner in any way from conducting independent inspections of the Permittee's facility and from taking any enforcement action that the Commissioner deems appropriate.



Attachment A  
Waste Analysis Plan



(

(

(

# Waste Analysis Plan



HERITAGE-CRYSTAL CLEAN, LLC  
HARTFORD BRANCH  
EPA ID NO. TO BE DETERMINED  
94 MURPHY ROAD  
HARTFORD, HARTFORD COUNTY, CONNECTICUT 06114

November 2008  
Revised June 2012, February 2013, May 2013

*This page intentionally left blank.*

## 1.0 INTRODUCTION

This plan contains a description of the chemical and physical nature of the hazardous wastes handled at the Heritage-Crystal Clean (Crystal Clean) Hartford Branch, and the waste analysis plan for their safe handling and storage. The information in this section is submitted in accordance with Connecticut General Statutes (CGS) Section 22a-449(c)-110 and Title 40 *Code of Federal Regulations* (40 CFR) 270.14(b)(2), 270.14(b)(3) and 264.13(c).

## 2.0 FACILITY DESCRIPTION

The Hartford Branch transfer facility will consist of four loading docks and a paved route truck and transfer trailer holding yard. The loading docks will be used interchangeably by one trailer of product from the distribution hub, one transfer trailer for containerized wastes, and one route truck. At most, two additional route trucks will be parked in the parking lot at any one time, for a total of one transfer trailer truck and three route trucks for waste. The total waste capacity of one transfer trailer and three route trucks is 8,000 gallons (no more than 1,200 gallons of containerized waste per truck, and one transfer trailer [4,400 gallons] of containerized waste). The total square footage of the area proposed for transfer activities is approximately 960 square feet in the building and 4,000 square feet in the parking lot. The Hartford Branch will not generate any wastes that will be accumulated in satellite accumulation areas or 90-day container storage areas.

In general, the Crystal Clean parts-cleaning solvents (product) supplied to customers include both bulk materials and material packaged in forms designed for sale to end users. The majority of these solvents are low-vapor-pressure mineral spirits. Some of the other solvents handled contain volatile organic compounds (VOC) that can become air pollutants, if released. However, no solvent or waste stream containers will be opened at the Crystal Clean Hartford Branch. The Crystal Clean Hartford Branch will collect lab pack containers from customers for transfer. Crystal Clean personnel will not prepare lab pack containers but may subcontract this service. The Crystal Clean Hartford Branch will not collect gas cylinders from customers for disposal/recycling. The Crystal Clean Hartford Branch will not accept any wastes dropped off at the facility. Containerized wastes are discussed in more detail in Section 3.0 of this plan.

## 3.0 PREQUALIFICATION PROCESS

For waste streams other than spent parts washing solvents, Crystal Clean uses a waste prequalification process to ensure that wastes handled are acceptable for the waste management policies and procedures employed by the company, and are compatible with other wastes handled by Crystal Clean. Upon arrival at a generator facility, Crystal Clean personnel will verify that each container to be collected contains a preapproved waste stream in a DOT-approved container that is in good condition and clearly and correctly labeled. The waste acceptance process requires customers to submit waste profile forms, as well as material safety data sheet (MSDS), to the corporate-level Crystal Clean Environment, Health, and Safety department for review and approval. When required by the destination facility or otherwise determined by HCC, a prequalification sample and laboratory analysis is required. If a waste does not appear to match the description on the preprinted manifest, Crystal Clean personnel will use a company-issued, internet-capable phone to double check the information on the manifest against the generator's approved waste streams. Appendix 1 includes an example Standard Waste Profile Survey, a Waste Stream Survey Form, and a list of generic waste profiles maintained by Crystal Clean. If the information (customer's name and address, DOT shipping description, waste approval numbers, TSDF name, type of container, restrictions) does not match the information on the manifest or shipping papers, Crystal Clean personnel will double check this information against the approved waste stream. If there is a discrepancy between the manifest or shipping papers and the waste stream, the waste will be rejected for pick-up at the generator's site.

In general, Crystal Clean does not accept oxidizers, but with the exception of D031, F037, and F038, will consider all U.S. Environmental Protection Agency (EPA) D-, F-, and U-listed hazardous waste codes, as defined in 40 CFR 261, as potential wastes to be managed through the Crystal Clean Hartford Branch. Because Crystal Clean has a waste approval system that screens potential wastes prior to acceptance, Crystal Clean is able to reject any wastes that might prove to be incompatible with commonly accepted wastes in the Crystal Clean program. Crystal Clean will also accept non-RCRA Connecticut-regulated hazardous wastes, including waste polychlorinated biphenyls (PCB) (CR01), waste oil (CR02), waste water-soluble oil (CR03), waste chemical liquid (CR04), and waste chemical solids (CR05).

#### 4.0 WASTE HANDLING

Hazardous wastes transported by route trucks to the Hartford Branch will be logged in, and all wastes will be moved to the designated transfer trailer for transport to the Branch's distribution hub. The distribution hub transports wastes to their generator-designated disposal facility.

The Crystal Clean Hartford Branch will utilize the Company's electronic log for tracking all hazardous waste containers as they are transported on the route trucks, transferred from the route trucks to the transfer trailer, and then transferred to a Crystal Clean hub. Containers are logged into the facility's computer system upon arrival. Containers are logged out as they leave within 10 days. The log will identify a container by a specific number, customer name, date the container was placed on the route truck, the time the container is transferred to the transfer trailer, and date of transfer out of the facility. The computer system generates a cover shipping paper for all items in the outbound shipment from the branch. Additionally, Crystal Clean can search a database of customers regarding services provided, dates of service and billing information.

As a transporter, the Crystal Clean waste profile approval program is driven by the DOT hazard class for each waste considered for transport and the requirements of its Connecticut hazardous waste transporter permit. Therefore, prior to accepting any waste for transport, Crystal Clean looks at compatibility of materials to be transported, and at health and safety considerations. A copy of the DOT Hazardous Materials Segregation Chart from 49 CFR 177.848 is provided as Appendix 2. Crystal Clean does not operate under any DOT Special Exemptions.

Crystal Clean has developed and is rolling out a wireless barcode system for container tracking at all of its warehouses. This system will be employed at the Hartford Branch to electronically track each container's waste profile and transfer log, as described above.

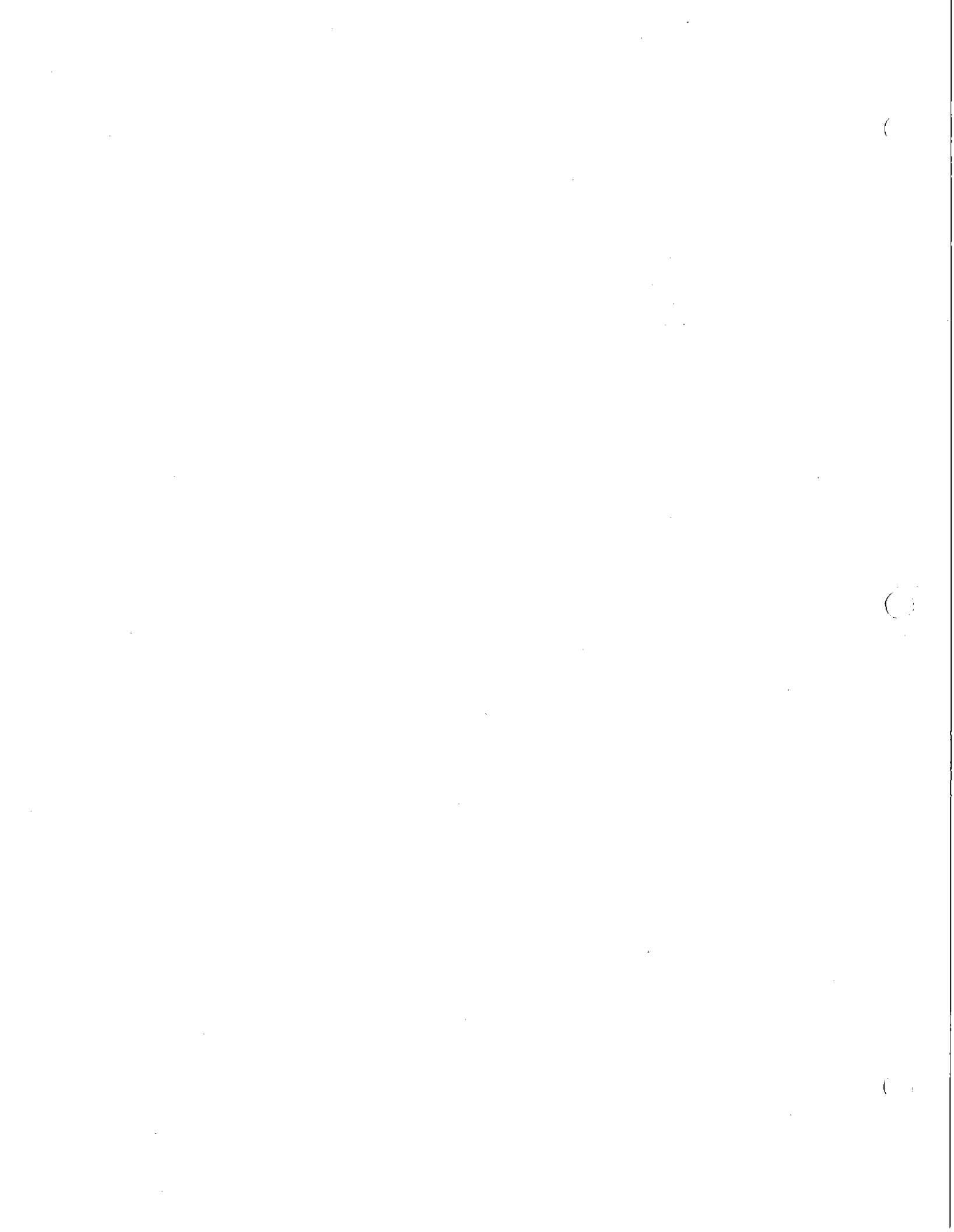
The Hartford Branch will manage a wide variety of hazardous and non-hazardous waste streams on a truck-to-truck transfer basis. Appendix 1 contains the primary characteristics and chemical compositions for potential waste streams that will be handled at the Hartford Branch. Although Crystal Clean will transfer computers, electronics, lighting ballasts, batteries, light bulbs, and other electronic wastes through the Hartford Branch, Crystal Clean will not be a universal waste handler.

If a container is observed to be degraded during its transfer at the Hartford Branch, Crystal Clean personnel will conduct an inspection to determine the appropriate response. Leaking containers will be overpacked by Crystal Clean personnel. Bulging containers will require assistance from Crystal Clean's emergency response subcontractor, CHEMTREC.

## 5.0 WASTE ANALYSIS PLAN

This waste analysis plan describes the methodologies necessary to properly manage hazardous waste at the Crystal Clean Hartford Branch. As previously stated, non-parts cleaning wastes are subject to Crystal Clean's waste approval program prior to acceptance into the Crystal Clean waste handling system.

Wastes managed at the Hartford Branch will be managed in DOT-approved containers and will not be opened at the facility. The hazardous waste manifest provided by the generator will show termination at the final disposal facility and will not identify the Hartford Branch as the termination facility. Prior to pickup by the Hartford Branch, the generator will obtain approval from the final disposal facility, and signify that the waste has been approved for acceptance in accordance with the designated disposal facility's Waste Analysis Plan.



**APPENDIX 1**

**STANDARD WASTE PROFILE SURVEY, GENERIC WASTE PROFILE LIST, AND  
WASTESTREAM SURVEY FORM**



*This page intentionally left blank.*



**STANDARD WASTE PROFILE SURVEY**  
Waste Approvals – Fax 847-836-6169

877-938-7948

For Internal GC Use	
CC Customer #	
CCMS #	

THIS FORM IS DEEMED PART OF THE BELOW REFERENCED SERVICE AGREEMENT BETWEEN HERITAGE-CRYSTAL CLEAN, LLC, AND THE IDENTIFIED CUSTOMER AND ALL TERMS AND CONDITIONS AND CERTIFICATIONS CONTAINED THEREIN ARE DEEMED A PART HEREOF.

1. Company	Contact
USEPA ID #  <small>    --    --    --    --    --    --    --    --    --    --    --    --</small> <small>State    Letter    #    #    #</small>	State ID # (if applicable)
Service Agreement #: (required)	HCC Generator# (if available)
HCC Branch:	HCC Rep:

2. STANDARD WASTE PROFILE — WASTE STREAMS PROFILE			
	PROFILE #	WASTE STREAM	CC PRODUCT CODES
<input type="checkbox"/>	10-1	Antifreeze	1050
<input type="checkbox"/>	10-2	Oil Filters 55G (55 gallons)	1051, 1051C, 1051P
<input type="checkbox"/>	10-3	Oil Filters 30G (30 gallons)	1052, 1052P
<input type="checkbox"/>	10-4	Oil Filters 10G (10 gallons)	1053, 1053P
<input type="checkbox"/>	10-5	Batteries Alkaline	1061
<input type="checkbox"/>	10-6	Batteries Pb Acid	1062
<input type="checkbox"/>	10-7	Non-PCB Ballast	1063
<input type="checkbox"/>	10-8	Batteries Ni-Cd 16G (16 gallons)	1064
<input type="checkbox"/>	10-9	Batteries Lithium 16G (16 gallons)	1065
<input type="checkbox"/>	10-10	Batteries Alkaline 5G (5 gallons)	1066
<input type="checkbox"/>	10-11	Batteries Ni-Cd 5G (5 gallons)	1067
<input type="checkbox"/>	10-12	Batteries Lithium 5G (5 gallons)	1068
<input type="checkbox"/>	10-13	Bulbs 4ft	1070, 1070P
<input type="checkbox"/>	10-14	Bulbs 8ft	1071, 1071P
<input type="checkbox"/>	10-15	Bulbs HID	1072
<input type="checkbox"/>	10-16	Broken Fluorescent Bulbs 55G (55 gallons)	1073
<input type="checkbox"/>	10-17	Empty Drum 55G (55 gallons)	1080
<input type="checkbox"/>	10-18	Immersion Cleaner	1673, 1873
<input type="checkbox"/>	TURNED OFF	Absorbents/Debris (non-haz or oil)	1040
<input type="checkbox"/>	10-20	Paint Gun Cleaner <b>SQGs only</b>	1681, 1682, 1881
<input type="checkbox"/>	10-21	Computer Keyboards	1077
<input type="checkbox"/>	10-22	Crystal Clean Aqueous Parts Cleaner	Various
<input type="checkbox"/>	10-23	Computer CPUs, Circuit Boards	1076
<input type="checkbox"/>	10-24	AFS Filter Canister	1174
<input type="checkbox"/>	10-25	Computer CRTs/Monitors	1075
<input type="checkbox"/>	10-26	Used oil (in drums only)	1054
<input type="checkbox"/>	10-27	Gasoline (RCRA-Exempt Fuel)	1008

3. Customer Hazardous Waste Generator Status Certification (to be completed by customer – check one box)		
<input type="checkbox"/> <b>CESQG</b>	<input type="checkbox"/> <b>SQG</b>	<input type="checkbox"/> <b>LQG</b>
Conditionally Exempt Small Quantity Generator < 100 kg/month	Small Quantity Generator ≥ 100 kg/month	Large Quantity Generator ≥ 1,000 kg/month

**4. Customer Certification**


1. This constitutes a "Wastestream Survey" for purposes of services rendered hereunder. HCC will create and upon request, deliver to Customer a document called an "Approval for Waste Services" based on the information contained in this Wastestream Survey. A separate Approval for Waste Services is generated for each Wastestream Survey submitted by Customer. The Identification number (Wastestream #) assigned to the Wastestream Survey is set forth in the Approval for Waste Services. Customer further acknowledges and agrees that HCC bases its testing, evaluation, collection, handling and processing procedures on the description of Waste Materials contained in the Wastestream Survey and/or Approval for Waste Services ("Waste Materials") relating to Waste Materials.
2. Customer will tender and HCC will collect the Waste Materials at Customer's facility. At such time, Customer will apprise HCC of the Wastestream Number(s) assigned to the Waste Materials tendered, and Customer will sign HCC's "Work Order" form which will state the Wastestream Number assigned to the Waste Materials being tendered. By signing the Work Order, Customer agrees that it represents and warrants to HCC that the Waste Materials tendered under that Work Order: (i) are accurately and completely described in the Wastestream Survey or the delivered Approval for Waste Services bearing the Wastestream Number ascribed to such Waste Materials and shown on the Work Order; and (ii) were produced in the same process that produced the Waste Materials described in said Wastestream Survey or Approval for Waste Services. Waste Materials that do not conform to the description thereof in said HCC documentation will be handled in the manner set forth in Section 3 below.
3. Subject to the remaining provisions of this Section 3, at the time HCC takes possession of and removes the Waste Materials from the Customer's facility, title, risk of loss and all other incidents of ownership to the Waste Materials shall be transferred from Customer and vested in HCC. Any marketable or usable material HCC may recover from the Waste Materials shall be the sole property of HCC. HCC shall have the right, but not the obligation, to inspect, sample, analyze and/or test any Waste Materials before accepting such Waste Materials. Failure or refusal of Customer to provide HCC with access to such Waste Materials prior to HCC's acceptance thereof shall be deemed a nonconforming tender of those Waste Materials. HCC's exercise of, or failure to exercise, said right to inspect and sample shall not operate to relieve Customer of its responsibility or liability under this Agreement. Waste Materials shall be considered nonconforming for purposes of this Agreement if they do not conform to the description contained in this Wastestream Survey or the delivered Approval for Waste Services which bears the Wastestream Number shown on the Work Order that was signed by the Customer when the Waste Materials were tendered to HCC. In the event that any or all Waste Materials are discovered to be nonconforming, HCC may refuse to accept, or revoke its prior acceptance of the Waste Materials. A justified revocation of acceptance shall operate to revert title, risk of loss and all other incidents of ownership in or to such Waste Materials in Customer at the time revocation and reasons therefore are communicated orally or in writing to Customer. Waste Materials for which HCC has revoked its acceptance shall be properly stored and prepared for lawful transportation by HCC. Such Waste Materials will be returned to Customer within a reasonable time; unless within such time the parties agree to some alternative manner of handling and/or lawful disposition, and HCC confirms such agreement in writing to Customer. Payment shall be made in accordance with such agreement. Customer shall further pay HCC its reasonable expenses and charges for analyzing, handling, loading, preparing, transporting and storing nonconforming Waste Materials returned to Customer under this section. HCC's acceptance of any load or portion of a load of nonconforming Waste Materials shall not be deemed a waiver of HCC's right to reject any other loads of nonconforming Waste Materials.
4. Customer represents and warrants that: (a) all Waste Materials to be transferred to HCC hereunder will conform to the description of such Waste Materials contained in the Wastestream Survey or Approval for Waste Services which bears the Wastestream Number associated with that particular stream of Waste Materials; (b) said description of the Waste Materials is true and complete and fairly advises HCC of the hazards and risks known by the Customer to be incident to the collection, recycling, treatment and/or disposal of the Waste Materials; (c) containers tendered by it with the Waste Materials shall be clean, fit and proper for the purpose for which they are intended, and shall comply with all applicable laws, regulations and orders; (d) it holds clear title to all Waste Materials to be transferred hereunder, and it is under no legal restraint order which would prohibit transfer of possession or title to such Waste Materials to HCC.
5. Customer grants HCC, its agents and employees reasonable access to Customer's premises while providing service.
6. HCC has the right to utilize various disposal site options for the Waste Materials described in the attached Waste Stream Survey or Approval for Waste Services which bears the Wastestream Number associated with that particular stream of Waste Materials, provided any such site has the appropriate permits for and will accept the Waste Materials. However, under RCRA and CERCLA laws and regulations, the generator of the Waste Materials has the ultimate legal liability for the evaluation and selection of the proper disposal site. HCC also has the right to provide transportation services.

I hereby certify that all information submitted herein and attached contains true, accurate and complete descriptions of the Waste Materials. Any sample submitted for analysis is representative of the Waste Materials being offered for approval. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I have reviewed the physical facilities, administrative practices, and operational procedures (or have directed the completion of such a review) and based on this review do willingly make this certification. I authorize HCC to obtain a sample from any waste shipment for purposes of recertification. I will notify HCC if my generator status, waste description or any other information on this form changes.


Customer Name (Printed)	Company Name
Customer Signature	Date

### GENERIC WASTE PROFILE

- Aerosol Cans
- Branch Generated Waste
- Bulbs (non-SWP - U-bends, Circular, etc.- Product Code 1074)
- Competitor Solvent (first time pickups from COMs) and Failed Reuse (Parts Cleaning)
- Computer/ Electronics
- Dry Cleaner Filters
- Dry Cleaner Sludge
- Dry Cleaner Waste
- Fuel Filters (Gasoline only)
- Gas Tanks - Empty
- Non-Hazardous Absorbents
- Non-PCB Light Ballasts
- Oil-Contaminated Absorbents New
- Paint Booth Filters
- Paint Sludge and Debris
- Paint Waste
- PCB Light Ballasts
- RCRA Empty Gas Tanks

		<b>Heritage-Crystal Clean, LLC</b>		Approval #				
		<b>WASTESTREAM SURVEY FORM</b>		CCMS #				
HCC Location:	<input type="text"/>	HCC Representative:	<input type="text"/>	CC Cust #				
				SA #				
		Phone: (877) 938-7948		Fnx: (847) 836-6169				
<b>Section A - CUSTOMER INFORMATION:</b>			<b>MAILING ADDRESS (if different):</b>					
Generator:	<input type="text"/>		Company Name:	<input type="text"/>				
Address:	<input type="text"/>		Address:	<input type="text"/>				
City:	<input type="text"/>		City:	<input type="text"/>				
State:	<input type="text"/>	Zip:	<input type="text"/>					
Phone:	<input type="text"/>		State:	<input type="text"/>	Zip:			
USEPA ID #	<input type="text"/>		PACKAGE:	<input type="text"/>				
State ID #	<input type="text"/>		Container Type:	<input type="text"/>				
GENERATOR STATUS: <input type="text"/>			SIC / NAICS CODE:	<input type="text"/>				
			Container Size:	<input type="text"/>				
<b>Section B - WASTESTREAM INFORMATION:</b>								
Common Name: <input type="text"/>								
Generating Process: <input type="text"/>								
DOT Description: <input type="text"/>								
<b>Section C - CHEMICAL COMPOSITION:</b> Use specific chemical names, list all constituents present in wastestream.								
Attach available analyses or MSDS's. Remember to identify Form TTRI Toxic Chemicals. Total composition must equal or exceed 100%								
Constituents			Range	Units				
<input type="text"/>			<input type="text"/>	<input type="text"/>	<input type="checkbox"/>			
<input type="text"/>			<input type="text"/>	<input type="text"/>	Put X in box if MSDS is Attached			
<input type="text"/>			<input type="text"/>	<input type="text"/>	<input type="checkbox"/>			
<input type="text"/>			<input type="text"/>	<input type="text"/>	Put X in box if UHC is Attached			
<input type="text"/>			<input type="text"/>	<input type="text"/>	Note: UHC Forms required for LQG and SQG			
<input type="text"/>			<input type="text"/>	<input type="text"/>				
<b>Section D - IDENTIFY WASTE CODES:</b>								
US EPA Waste Codes: <input type="text"/>								
US EPA Form Codes: <input type="text"/>			US EPA Source Codes: <input type="text"/>					
State Waste Codes: <input type="text"/>								
<b>Section E - WASTESTREAM DESCRIPTORS:</b>								
Color:	Appearance:		Odor:					
% Solids:	% Liquids:							
<b>Section F - WASTESTREAM PARAMETERS:</b>								
Physical State:	<input type="text"/>	SOLID	LIQUID	SLUDGE	SEMI-SLUDGE	POWDER	GAS	
If solid, are there free liquids	<input type="text"/>	Y / N	(If no, will waste dump from a Drum?)			<input type="text"/>	Y / N	
Is the wastestream pumpable?	<input type="text"/>	Y / N						
Does the wastestream contain debris?	<input type="text"/>	Y / N						
<b>pH or pH Range:</b>								
Flash Point:	<input type="text"/>	<100	or	100 - 140	or	141 - 200	or	>200 (DEG F)
Boiling Point:	<input type="text"/>	<100	or	>100	(DEG F)			
Fuel Value:	<input type="text"/>	<2000	or	2000 - 6000	or	6000 - 10000	or	>10000 (BTU/LB)

Revised 4/27/05

Page 2 

Is the waste generated from, or associated with metal finishing?  Y / N

If the waste is federally hazardous, is the waste subject to Subpart CC regulations at 40 CFR 265.1085-1091 (i.e. hazardous waste)?  Y / N

Does the material meet the definition of Used Oil (40 CFR 279)?  Y / N

If yes, has the waste been mixed with hazardous waste?  Y / N NA

Does the wastestream contain asbestos?  Y / N If Yes, is the asbestos friable?  Y / N NA

Does the wastestream contain human sanitary, biological, or infectious waste?  Y / N

Does the wastestream contain dioxins or furans or dioxin-precursors?  Y / N

Does the wastestream contain radioactive wastes?  Y / N

Does the wastestream contain PCB's  Y / N If Yes, are they non leaking? \_\_\_\_\_ ppm

Is the wastestream air reactive, autoignitable, pyrophoric, or spontaneously combustible?  Y / N

Is the wastestream water reactive?  Y / N

Does the wastestream present other compatibility concerns?  Y / N If Yes, specify \_\_\_\_\_

Is the wastestream dusty  Y / N

Does the wastestream contain chelating agents?  Y / N

If wastestream carries F001, F002, F003, F004, and/or F005 codes, identify concentration in mg/L or mg/kg for each constituent. However, if constituent is present but concentration is unknown, check the line(s) that corresponds.

Acetone	2-Ethoxyethanol	2-Nitropropane
Benzene	Ethyl Acetate	Pyridine
n-Butyl Alcohol	Ethyl Chloride	Tetrachloroethylene
Carbon Disulfide	Ethyl Ether	Toluene
Carbon Tetrachloride	Isobutanol	1,1,1-Trichloroethane
Chlorobenzene	Methanol	1,1,2-Trichloroethane
Cresol (o and p)	Methylene Chloride	Trichloroethylene
o-Cresol	Methyl Ethyl Ketone	1,1,2-Trichloro-1,2,2-tetrafluoroethane
Cyclohexanone	Methyl Isobutyl Ketone	Trichlorofluoroethane
1,2-Dichloroethane	Nitrobenzene	Xylenes (total)

**23. Certification: Sign and date the certification.**

1. This constitutes a "Wastestream Survey" for purposes of services rendered hereunder. HCC will create and upon request, deliver to Customer a document titled an "Approval for Waste Services" based on (i) the information contained in this Wastestream Survey, and (ii) where applicable, the results of the analysis performed on the sample that was submitted with such Survey. A separate Approval for Waste Services is generated for each Wastestream Survey submitted by Customer. The Identification Number (Wastestream #) assigned to the Wastestream Survey is set forth in the Approval for Waste Services. Customer further acknowledges and agrees that HCC bases its testing, evaluation, collection, handling and processing procedures on the description of Waste Materials contained in the Wastestream Survey and/or Approval for Waste Services ("Waste Materials") relating to Waste Materials.

2. Customer will tender and HCC will collect the Waste Materials at Customer's facility. At such time, Customer will apprise HCC of the Wastestream Number(s) assigned to the Waste Materials tendered, and Customer will sign HCC's "Work Order" form which will state the Wastestream Number assigned to the Waste Materials being tendered. By signing the Work Order, Customer agrees that it represents and warrants to HCC that the Waste Materials tendered under that Work Order: (i) are accurately and completely described in the Wastestream Survey or the delivered Approval for Waste Services bearing the Wastestream Number assigned to such Waste Materials and shown on the Work Order; and (ii) were produced in the same process that produced the Waste Materials described in said Wastestream Survey or Approval for Waste Services. Waste Materials that do not conform to the description set forth in said HCC documentation will be handled in the manner set forth in Section 3 below.

3. Subject to the remaining provisions of this Section 3, at the time HCC takes possession of and removes the Waste Materials from the Customer's facility, title, risk of loss and all other incidents of ownership in the Waste Materials shall be transferred from Customer and vested in HCC. Any marketable or usable material HCC may recover from the Waste Materials shall be the sole property of HCC. HCC shall have the right, but not the obligation, to inspect, sample, analyze and/or test any Waste Materials before accepting such Waste Materials. Failure or refusal of Customer to provide HCC with access to such Waste Materials prior to HCC's acceptance thereof shall be deemed a nonconforming tender of those Waste Materials. HCC's exercise of, or failure to exercise, such right to inspect and sample shall not operate to relieve Customer of its responsibility or liability under this Agreement. Waste Materials shall be considered nonconforming for purposes of this Agreement if they do not conform to the description contained in the Wastestream Survey or the delivered Approval for Waste Services which bears the Wastestream Number shown on the Work Order that was signed by the Customer when the Waste Materials were tendered to HCC. In the event that any or all Waste Materials are discovered to be nonconforming, HCC may refuse to accept, or revoke its prior acceptance of the Waste Materials. A justified revocation of acceptance shall operate to reset title, risk of loss and all other incidents of ownership in or to such Waste Materials in Customer at the time revocation and reasons therefore are communicated orally or in writing to Customer. Waste Materials for which HCC has revoked its acceptance shall be properly stored and prepared for lawful transportation by HCC. Such Waste Materials will be returned to Customer within a reasonable time, unless within such time the parties agree to some alternative manner of handling and/or lawful disposition, and HCC confirms such agreement in writing to Customer. Payment shall be made in accordance with such agreement. Customer shall further pay HCC its reasonable expenses and charges for analyzing, handling, loading, preparing, transporting and storing nonconforming Waste Materials returned to Customer under this section. HCC's acceptance of any load or portion of a load of nonconforming Waste Materials shall not be deemed a waiver of HCC's right to reject any other loads of nonconforming Waste Materials.

4. Customer represents and warrants that: (a) all Waste Materials to be transferred to HCC hereunder will conform to the description of such Waste Materials contained in the Wastestream Survey or Approval for Waste Services which bears the Wastestream Number associated with that particular stream of Waste Materials; (b) said description of the Waste Materials is true and complete and fully advises HCC of the hazards and risks known by the Customer to be incident to the collection, recycling, treatment and/or disposal of the Waste Materials; (c) containers tendered by it with the Waste Materials shall be clean, fit and proper for the purpose for which they are intended, and shall comply with all applicable laws, regulations and orders; (d) it holds clear title to all Waste Materials to be transferred hereunder, and (e) it is under no legal restraint or order which would prohibit transfer of possession or title to such Waste Materials to HCC.

5. Customer grants HCC, its agents and employees reasonable access to Customer's premises while providing service.

6. HCC has the right to utilize various disposal site options for the Waste Materials described in the attached Waste Stream Survey or Approval for Waste Services which bears the Wastestream Number associated with that particular stream of Waste Materials, provided any such site has the appropriate permits for and will accept the Waste Materials. However, under RCRA and CERCLA laws and regulations, the generator of the Waste Materials has the ultimate legal liability for the evaluation and selection of the proper disposal site. HCC also has the right to provide transportation services.

I hereby certify that all information submitted herein and attached contains true, accurate and complete descriptions of the Waste Materials. Any sample submitted for analysis is representative of the Waste Materials being offered for approval. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I have reviewed the physical facilities, administrative practices, and operational procedures (or have directed the completion of such a review) and based on this review do willingly make this certification. I authorize HCC to obtain a sample from any waste shipment for purposes of certification. I will notify HCC if my generator's status, waste description or any other information on this form changes.

PRINTED NAME:	COMPANY NAME:
SIGNATURE:	DATE: <span style="float: right;">Revised 4/27/05</span>

*This page intentionally left blank.*

**APPENDIX 2**

**DEPARTMENT OF TRANSPORTATION  
HAZARDOUS MATERIALS SEGREGATION CHART  
FROM 49 CFR 177.848**



*This page intentionally left blank.*

**DEPARTMENT OF TRANSPORTATION  
HAZARDOUS MATERIALS SEGREGATION CHART  
FROM 49 CFR 177.848**

Class or division	Notes	1.1	1.2	1.3	1.4	1.5	1.6	2.1	2.2	2.3 Gas Zone A	2.3 Gas Zone B	3	4.1	4.2	4.3	5.1	5.2	6.1 Liquids PG I Zone A	7	8 Liquids Only
Explosives	1.1 and 1.2 A	*	*	*	*	*	*	X	X	X	X	X	X	X	X	X	X		X	X
Explosives		*	*	*	*	*	*	X		X	X	X		X	X	X	X			X
Explosives		*	*	*	*	*	*	O		O	O	O		O				O		O
Very insensitive explosives	1.5 A	*	*	*	*	*	*	X	X	X	X	X	X	X	X	X	X		X	X
Extremely insensitive explosives		*	*	*	*	*	*													
Flammable gases		X	X	X	O	X				X	O							O		
Non-toxic, non-flammable gases		X				X														
Poisonous gas Zone A		X	X	X	O	X		X				X	X	X	X	X	X			X
Poisonous gas Zone B		X	X	X	O	X		O				O	O	O	O	O	O			O
Flammable liquids		X	X	X	O	X				X	O					O		X		
Flammable solids		X				X				X	O							X		O
Spontaneously combustible materials		X	X	X	O	X				X	O							X		X
Dangerous when wet materials		X	X	X		X				X	O							X		O
Oxidizers	5.1 A	X	X	X		X				X	O	O						X		O
Organic peroxides		X	X	X		X				X	O							X		O
Poisonous liquids PG I Zone A		X	X	X	O	X		O				X	X	X	X	X	X			X
Radioactive materials		X				X		O												
Corrosive liquids		X	X	X	O	X				X	O		O	X	O	O	O	X		

Instructions for using the segregation table for hazardous materials are as follows:

- (1) The absence of any hazard class or division or a blank space in the table indicates that no restrictions apply.
- (2) The letter "X" in the table indicates that these materials may not be loaded, transported, or stored together in the same transport vehicle or storage facility during the course of transportation.
- (3) The letter "O" in the table indicates that these materials may not be loaded, transported, or stored together in the same transport vehicle or storage facility during the course of transportation unless separated in a manner that, in the event of leakage from packages under conditions normally incident to transportation, commingling of hazardous materials would not occur. Notwithstanding the methods of separation employed, Class 8 (corrosive) liquids may not be loaded above or adjacent to Class 4 (flammable) or Class 5 (oxidizing) materials; except that shippers may load truckload shipments of such materials together when it is known that the mixture of contents would not cause a fire or a dangerous evolution of heat or gas.
- (4) The "\*" in the table indicates that segregation among different Class 1 (explosive) materials is governed by the compatibility table in paragraph (f) of this section.
- (5) The note "A" in the second column of the table means that, notwithstanding the requirements of the letter "X", ammonium nitrate (UN 1942) and ammonium nitrate fertilizer may be loaded or stored with Division 1.1 (explosive) or Division 1.5 materials.
- (6) When the § 172.101 table or § 172.402 of this subchapter requires a package to bear a subsidiary hazard label, segregation appropriate to the subsidiary hazard must be applied when that segregation is more restrictive than that required by the primary hazard. However, hazardous materials of the same class may be stowed together without regard to segregation required for any secondary hazard if the materials are not capable of reacting dangerously with each other and causing combustion or dangerous evolution of heat, evolution of flammable, poisonous, or asphyxiant gases, or formation of corrosive or unstable materials.

Attachment B  
Contingency Plan

( )

( )

( )

# **RCRA Contingency Plan**

**For**

**Heritage-Crystal Clean, LLC  
Hartford Branch**



HERITAGE-CRYSTAL CLEAN, LLC  
HARTFORD BRANCH  
94 MURPHY ROAD  
HARTFORD, HARTFORD COUNTY, CONNECTICUT 06114

**November 2008  
Revised June 2012, February 2013, May 2013**

## TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION .....	3
2.0 IMPLEMENTATION OF THE CONTINGENCY PLAN.....	4
3.0 REVISIONS TO THE CONTINGENCY PLAN .....	4
4.0 EMERGENCY NOTIFICATION .....	4
5.0 DUTIES AND RESPONSIBILITIES OF EMERGENCY COORDINATOR.....	5
6.0 PREVENTION PROCEDURES, STRUCTURES, AND EQUIPMENT .....	5
7.0 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTES .....	6
8.0 IDENTIFICATION OF HAZARDOUS MATERIALS .....	6
9.0 CHAIN OF COMMAND .....	7
10.0 EMERGENCY RESPONSE CONTRACTORS .....	7
11.0 EMERGENCY EQUIPMENT.....	7
12.0 EMERGENCY RESONSE PROCEDURES .....	9
12.1 FIRE AND/OR EXPLOSION .....	9
12.2 SPILL OR MATERIAL RELEASE .....	10
12.3 EVACUATION .....	10
12.4 REPORTING .....	11
13.0 EXTERNAL COMMUNICATIONS .....	11
14.0 ROUTINE DECONTAMINATION PROCEDURES.....	11
15.0 COORDINATION AGREEMENTS.....	12

### TABLES

<u>Table</u>	<u>Page</u>
TABLE 1 EMERGENCY RESPONSE EQUIPMENT .....	7

### FIGURES

<u>Figure</u>	<u>Page</u>
FIGURE 1 LOCATIONS OF EMERGENCY EQUIPMENT AND EVACUATION ROUTES .....	8

## CONTINGENCY PLAN

### 1.0 INTRODUCTION

This Contingency Plan has been prepared for the Heritage-Crystal Clean (Crystal Clean) Hartford Branch facility located at 94 Murphy Road, Hartford, Hartford County, Connecticut. It is designed to outline the emergency plan and emergency preparedness procedures to be implemented in case of a spill, fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste to air, soil, or water. A copy of the Contingency Plan and all revisions will be maintained at the facility and has been submitted to local police departments, fire departments, and state and local emergency response teams. The information in this section is submitted in accordance with the requirements for an emergency response and contingency plan as contained in Connecticut General Statutes (CGS) Section 22a-449(c)-110 and Title 40 Code of Federal Regulation (40 CFR) 270.14(b)(7) and 264, Subpart D.

The Crystal Clean Hartford Branch will be one of many Crystal Clean branch locations found throughout the U.S. Using route trucks, Crystal Clean provides parts cleaner equipment and solvent services to customers, and collects containerized hazardous and non-hazardous wastes from customers. Crystal Clean also provides other supplies, such as absorbents, storage containers, and cleaning supplies to customers. Crystal Clean also provides used oil and oily water services via an oil truck and a vacuum services bulk truck.

Crystal Clean's branch facilities are supported by one of four distribution hubs, located in Philadelphia (Fairless Hills), Pennsylvania; Atlanta, Georgia; Indianapolis, Indiana; and Shreveport, Louisiana. The Philadelphia Distribution Hub with service the Hartford branch. The distribution hubs provide supplies and parts washer solvent (product) and ship them to the branch locations by box trailers. The trailer will be delivered to the branch; the box trailer containing waste and returned parts cleaners will be hooked to the truck tractor and transported back to the Philadelphia Hub.

Crystal Clean branches collect containers of used parts washer solvent and other containerized waste such as paints, solvents, light bulbs, and oily water from customers for recycling and disposal. Small route box trucks are based at our branch facilities and are used to provide services to customers in the branch's area of service. The route trucks are used to both deliver materials to customers and pick up used solvents and wastes. These wastes are brought back to the local branch by the route trucks and then transferred to trailer trucks. Trailer trucks then take containers of used solvent, wastes picked up from customers, and parts cleaning equipment requiring refurbishment from the branches, back to the branch's supporting distribution hub. These trailer trucks are also known as transfer trailers, because they are used to "transfer" wastes or products from the branches to the distribution hubs.

In general, Crystal Clean does not accept oxidizers, but will consider all U.S. Environmental Protection Agency (EPA) D-, F-, and U-listed hazardous waste codes, as defined in 40 CFR 261, as potential wastes to be managed through the Crystal Clean Hartford Branch. Crystal Clean will also accept non-RCRA, Connecticut-regulated hazardous wastes, including waste polychlorinated biphenyls (PCB) (CR01), waste oil (CR02), waste water-soluble oil (CR03), waste chemical liquid (CR04), and waste chemical solids (CR05). The HCC Hartford Branch will not collect gas cylinders from customers for disposal/recycling.

Oil and Vacuum Services bulk trucks collect used oil and oily water, but do not off-load or load any materials at the branch. They park at the branch during off-hours.



## 2.0 IMPLEMENTATION OF THE CONTINGENCY PLAN

The provisions of the Contingency Plan shall be implemented whenever emergency situations arise which endanger public health and safety or the environment. Appendix 1 identifies emergency coordinators and external emergency contacts. This appendix will be posted at the Hartford Branch.

## 3.0 REVISIONS TO THE CONTINGENCY PLAN

The Contingency Plan shall be periodically reviewed and updated as necessary. Copies of this document are provided to local authorities, which may provide emergency service. At a minimum, this shall occur when:

- Facility permit is revised
- The plan fails in an emergency
- The mode of operation changes in a manner that materially increases the potential for fires, explosions, or releases of hazardous constituents, or changes the response necessary in an emergency
- The list of emergency coordinators changes
- The list of emergency equipment changes, or
- As required by the Connecticut Department of Energy and Environmental Protection (DEEP) Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division (WEED).

## 4.0 EMERGENCY NOTIFICATION

Appendix 1 provides agency contact information for emergency notification.

In the event of an applicable emergency, Crystal Clean Hartford Branch personnel will immediately notify 9-1-1. They will then contact CHEMTREC. CHEMTREC patches in the appropriate corporate EHS personnel. Events are assigned to EHS managers by discipline, spill, injury, vehicle accident, or property loss. Crystal Clean has a national contract with CHEMTREC. If appropriate, the Crystal Clean corporate EHS manager notifies the Connecticut DEEP, the National Response Center, and 911 within two hours with the following information:

- Name of the person reporting the incident
- Name, address, and the U.S. Environmental Protection Agency (EPA) identification number of the facility
- Phone number where the person reporting the incident can be reached
- Date, time and the location of the incident
- Mode of transportation and type of transport vehicle
- A brief description of the incident, including the type of incident
- Any injuries involved
- For each waste involved in the spill:
  - The name and EPA identification number of the generator of the waste;
  - Shipping name, hazard class, and United Nations (UN) or North American (NA) number of the waste;
  - Estimated quantity of the material or the waste spilled;
  - The extent of the contamination of land, water, or air;
- Shipping name, hazard class, and the UN or NA number of any other material carried.

In the event of an emergency or hazardous waste spill during transportation, the transporter will immediately notify the Local Emergency Planning Committee (LEPC) of the occurrence and the nature of the spill.

As a transporter, Crystal Clean will submit an online report of the incident, as required by 49 CFR 171.16 to the Chief, Information System Division, Transportation Programs Bureau, Department of Transportation, Washington DC 20690.

## 5.0 DUTIES AND RESPONSIBILITIES OF EMERGENCY COORDINATOR

Emergency coordinator and contact information for the Crystal Clean Hartford Branch is provided in Appendix 1. Emergency coordinators are given the responsibility for coordinating emergency response measures and will have the authority to commit the resources to carry out this Contingency Plan. Each coordinator will be thoroughly familiar with all aspects of the Contingency Plan, operations and activities at the site, the location and characteristics of wastes handled, the location of records, and the site layout.

At all times there will be at least one employee either on the facility's premises or on call with the responsibility for coordinating all emergency response measures. All Hartford Branch personnel will be instructed during personnel training of their role in coordinating emergency response measures. The primary and secondary environmental coordinators are available 24 hours a day, seven days a week.

Whenever there is an imminent or actual emergency situation, Crystal Clean must immediately:

- Activate the internal communication systems where applicable to notify site personnel. Cellular phones or verbal alerts will be used within the facility to alert others of emergency situations. Telephones will be located in the facility office and will be available to summon emergency assistance from police, the fire department or other response units. All personnel will have company provided cellular phones.
- Call 911, if needed
- Call CHEMTREC at 1-800-424-9300, "1". (CHEMTREC will then contact the Crystal Clean Environmental Health and Safety (EH&S) Department Manager.)
- EH&S Manager will notify outside emergency agencies, and call a response contractor, if needed.

If the emergency coordinators are not on-site and an emergency incident occurs, the remaining Hartford Branch personnel will be directed to evacuate the facility and to meet at the rally point (see Figure 1). Once the employees are safely out of the facility, the emergency coordinator will be contacted and a headcount will be completed to ensure all the employees are accounted for and are safe. The Hartford Branch personnel will help to control on-site traffic and ensure no one enters the facility until the hazards are removed or until the emergency coordinator arrives on-site.

In the event that surrounding businesses need to be notified in the event of an emergency incident, their contact information is provided in Appendix 1.

## 6.0 PREVENTION PROCEDURES, STRUCTURES, AND EQUIPMENT

All containers will be unloaded from the route trucks using a drum dolly and moved to the transfer trailer to avoid rupturing and puncturing the containers. No containers will be opened at the branch. Crystal Clean will not handle wastes in a way that would produce uncontrollable mists, fumes or gases.

There will be no runoff from the route trucks and transfer trailer, or the loading dock. The transfer area between the route trucks and transfer trailer will be an enclosed building. The perimeter walls within the building will prevent runoff. Any spills will be contained within the building walls or on paved areas. Additionally, the route trucks and transfer trailer have secondary containment systems. There is no potential for contamination of water supplies.

In the event of a brief power interruption, the local utility company will be contacted immediately for assistance.

## **7.0 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTES**

Incompatible wastes will not be handled at the Crystal Clean Hartford Branch. Wastes being transferred will be placed in designated transfer trailers according to the U.S. Department of Transportation (DOT) Compatibility Chart for shipment of materials with mixed hazard classes.

The Hartford Branch will be used for the transfer of containerized waste from the route truck to the transfer trailer while in transport from the generator to the designated disposal facility. To prevent a possible source of external ignition, containers of ignitable wastes in the transfer area will be clearly labeled identifying the contents. Signs will be placed in the transfer area that clearly read "No Smoking."

Before accepting waste into the Crystal Clean waste handling program, wastes are subjected to Crystal Clean's waste approval program (see the Waste Analysis Plan, Appendix J-1 of the permit application, for additional details).

In order to prevent the unauthorized placement of material into the transfer trailer, the trailer will be locked when not in use. Only employees directly involved in the handling of containerized waste in the transfer area will be authorized to place material in the transfer trailer. These employees will be trained in the proper methods for handling hazardous waste.

Example waste profiles are included in Appendix 1 of the Waste Analysis Plan (Appendix J-1 of the permit application). Attachment N of the permit application provides details of the required training program for handling ignitable or reactive waste.

All wastes handled in route trucks and transfer trailers at the Hartford Branch will be managed in accordance with DOT requirements.

Crystal Clean's waste approval program ensures that incompatible waste types are not transported. The branch personnel will be trained on the proper handling of wastes and are the only authorized personnel allowed to move wastes into transfer trailers.

## **8.0 IDENTIFICATION OF HAZARDOUS MATERIALS**

Whenever there is an emission, discharge, fire or explosion, Crystal Clean must immediately identify the character, exact source, amount and extent of emitted or discharged materials. Crystal Clean may do this by observation or review of records and, if necessary, by chemical analysis.

At the same time, the emergency coordinator, or designee, must assess possible hazards to human health and the environment that may result from the emission, discharge, fire, or explosion. If the determination is made that human health or environment are threatened, the emergency coordinator, or designee, must evacuate the facility (using company supplied cell phones) and immediately notify the appropriate local

response agencies and Crystal Clean's EH&S manager. Crystal Clean's EH&S manager will notify Connecticut DEEP, the National Response Center, and 911 within two hours by telephone.

During an emergency, the emergency coordinator, or designee, must take all measures necessary to ensure that the emission, discharge, fire or explosion does not occur, re-occur, or spread to other materials at the facility. These measures shall include, where applicable, stopping operation, collecting and containing released materials and removing or isolating containers. The emergency coordinator, or designee, must ensure that adequate monitoring is conducted for leaks, pressure build up, gas generation or ruptures of containers wherever appropriate.

Immediately after an emergency, Crystal Clean, with approval from Connecticut DEEP and City of Hartford Office of Emergency Management, must provide for treating, storing, or disposing of residues, contaminated soil, etc., resulting from the incident. Crystal Clean must ensure that, in the affected areas, no incompatible materials are treated, stored, or disposed of until clean up procedures are completed, and all emergency equipment is cleaned and fit for its intended use prior to resuming operations.

## **9.0 CHAIN OF COMMAND**

For the Hartford Branch, Crystal Clean's chain of command in an emergency response is as follows:

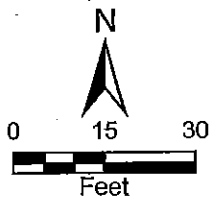
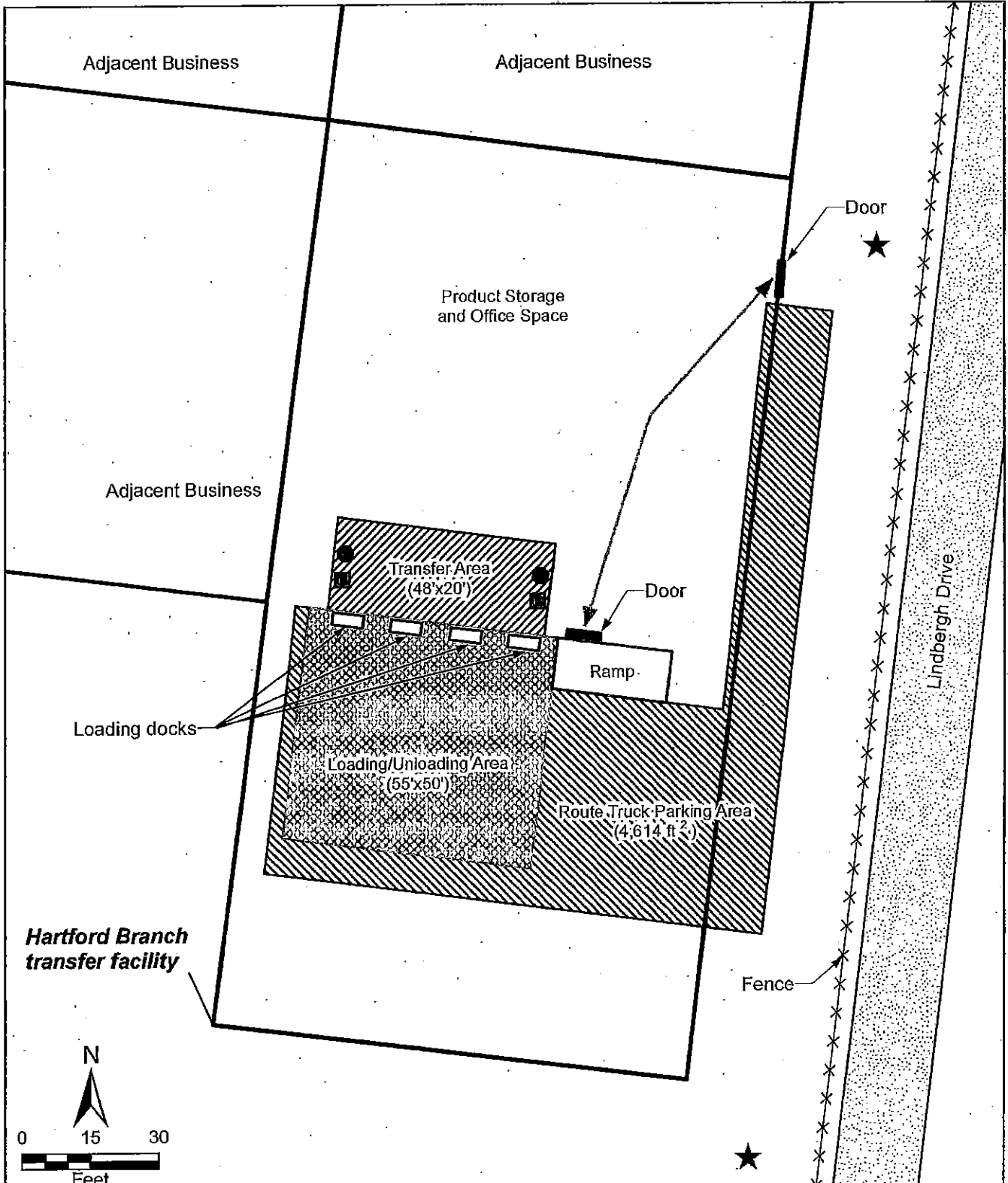
1. Branch Manager (Primary Emergency Coordinator)
2. Environment, Health, and Safety Manager (Secondary Emergency Coordinator)
3. Sales and Service Representative (Alternate Emergency Coordinator, if Primary and Secondary Emergency Coordinators are not available).

## **10.0 EMERGENCY RESPONSE CONTRACTORS**

Crystal Clean routinely uses the emergency response services of CHEMTREC, a 24-hour hazardous materials (HAZMAT) Communications Center that provides CHEMTREC registrants with access to emergency response for-hire contractors in the event that on-scene response or cleanup is needed. Emergency response contractors are therefore determined by event and location.

## **11.0 EMERGENCY EQUIPMENT**

Table 1 is a list of emergency equipment to be maintained at the Hartford Branch facility for use in the event of a spill or emergency (see Table 1). Emergency equipment locations are identified on Table 1 and diagrammed on Figure 1. Personal protective equipment and a first aid kit including an eyewash apparatus are carried on the route trucks and transfer trailers. Spill kits are also carried on transport vehicles.



- Legend**
- ★ Rally point
  - Fire extinguisher
  - Spill kit/PPE/first aid
  - Evacuation route
  - ▨ Asphalt area - route truck parking area
  - ▩ Concrete area - loading/unloading area
  - ▧ Transfer area

Heritage - Crystal Clean Hartford Branch  
94 Murphy Road  
Hartford, CT 06114

**Figure 1**  
Emergency Equipment & Evacuation Routes

**TETRA TECH**

Date: 02/16/13 Drawn By: M&W Wilderhut Project No: P4001.008

**TABLE 1**

**EMERGENCY RESPONSE EQUIPMENT**

<b>Equipment</b>	<b>Physical Description</b>	<b>Location</b>
Spill Response Equipment	Shovel, loose absorbent, boom absorbents, and containment pool	Branch warehouse, Route Trucks, and Transfer Trailers
Fire Extinguishers	Fire Extinguishers	Throughout branch, and Route Trucks.
Personal Protective Equipment	Respirators, protective clothing	Branch Warehouse and office
First Aid kits	First aid supplies, and eye wash	Branch, and Route Trucks

The building is equipped with fire extinguishers. All personnel will be trained to properly use the fire extinguishers. The equipment will be monitored, checked and tested by a subcontractor. Water for fire control in the area will be supplied by tanker trucks/hydrants operated by the local fire department. These tanker trucks/hydrants supply an adequate amount of water for fire control at the facility.

All equipment shall be tested and maintained, as necessary, to assure its proper operation in time of an emergency. After an emergency, all equipment shall be decontaminated, cleaned, and fit for its intended use before normal operations are resumed. A safety and emergency equipment checklist (Figure K-4) and inspection schedule (Table K-1) are provided in Attachment K of the permit application.

**12.0 EMERGENCY RESPONSE PROCEDURES**

Potential accidents fall under two general classifications: Fire and/or explosions; and spills or material release.

**12.1 FIRE AND/OR EXPLOSION**

The Hartford Branch can be easily accessed by fire-fighting and other emergency vehicles and equipment. The route truck and trailer parking areas will be kept clear at all times.

The following actions will be taken in the areas affected by the fire or explosion:

1. Operations will be shut down immediately
2. The emergency coordinator will be contacted (see Section 4.0 and Appendix 1 for emergency notification details)
3. The area will be cleared of personnel
4. All injured personnel will be removed and medical treatment will be administered by qualified personnel.

Area evacuation will be necessary in case of major fire or explosion. General evacuation procedures are described in Section 12.3, and evacuation routes are mapped on Figure 1. All personnel have been trained in evacuation procedures and means of exit from their respective work area.

When the fire has been extinguished and the safety of personnel is no longer endangered, an "all clear" signal is given verbally by the emergency coordinator, or designee. All emergency equipment used in the emergency will be cleaned and fit for use prior to resumption of operations in the affected areas.

## 12.2 SPILL OR MATERIAL RELEASE

If an employee discovers a chemical spill, he or she will immediately report it to the emergency coordinator. When contacted, the emergency coordinator will obtain the following information:

1. The material spilled or released and its location
2. An estimate of quantity released and the site at which it is being released
3. The direction in which the spill, vapor, or smoke release is heading
4. Any injuries involved
5. Fire and/or explosion or possibility thereof
6. The areas affected and the intensity of the fire or explosion.

Considering all of this information, the emergency coordinator, in consultation with the Crystal Clean corporate EH&S manager, will determine on a case-by-case basis whether the incident is within Hartford Branch emergency response capabilities. If it is, the necessary Hartford Branch personnel will be deployed. If it is not, the emergency coordinator will call 911, and contact CHEMTREC. Emergency and spill notification procedures are provided in Section 4.0 above.

Since only containers will be handled at the facility, the spill most likely to occur would be that involving a single container. The initial response to such an emergency would be to identify, isolate, contain, and treat the leaking container and spilled material. For spills occurring on the route trucks or transfer trailers, the trailer may be emptied of all containers, if necessary, to assist in the clean-up and decontamination process.

Most small spills and leaks will be easily contained within the immediate area. Since materials are accepted in containers only, and containers are never opened, the chance of a large spill is remote. However, should a spill occur, it would be contained within the route truck or transfer trailer containment system. Route trucks and transfer trailers are all enclosed with metal floor containment systems. If the spill were to occur while moving the container from the route truck to the transfer trailer, the spill would be contained within the building.

Upon direction of the emergency coordinator, or designee, clean-up personnel will use absorbent materials from the spill kits to contain and clean up a small spill. Spilled material will be collected by absorption in pads, booms, or other inert materials.

All clean-up areas and equipment will be decontaminated and fit for use following a spill incident. Decontamination procedures will be specific to the material released. The material safety data sheets (MSDS) required for waste acceptance include spill management information.

Any material collected from secondary containment or generated during cleanup will be placed in drums, characterized, and properly disposed of in accordance with applicable requirements.

## 12.3 EVACUATION

The emergency coordinator is responsible for determining which emergency situations require facility evacuation. A telephone system will be used to notify facility personnel as to the nature of the emergency and the recommended plan of action.

In the event a site evacuation is called for by the emergency coordinator, the following actions will be taken:

1. The call for evacuation will be given. This will be achieved either with the use of the internal communications system alarm or by voice, whichever is most expedient.
2. All personnel, visitors, and contractors will immediately leave through the designated evacuation route. The evacuation route is shown in Figure 1, which will be visibly posted in areas where emergency equipment is stored.
3. No further entry of visitors or contractors will be permitted. All vehicle traffic within the facility will cease to allow safe evacuation.
4. All facility personnel will be accounted for by their immediate supervisors. All other persons (e.g., visitors, contractors) onsite will be accounted for by their respective facility points of contact. No attempt to find persons not accounted for will involve endangering lives of others by re-entry into emergency areas.
5. Re-entry into emergency areas will be made for only after clearance is given by the emergency coordinator, or designee. At the emergency coordinator's, or designee's direction, a notification will be given for re-entry into the facility.

#### **12.4 REPORTING**

Within 24 hours following an emergency incident, the Crystal Clean Branch Manager will generate an on-line report documenting the incident and response actions. Subsequently, as applicable, Crystal Clean EH&S will evaluate the root cause of the incident, whether Crystal Clean personnel need additional training, and whether the Hartford Branch operations and/or contingency plan require revision.

#### **13.0 EXTERNAL COMMUNICATIONS**

The telephones located at the Hartford Branch will be used to contact emergency response agencies if an emergency situation should arise. Additionally, facility personnel can make use of cell phones, or nearby public phones to contact the emergency coordinator and/or notify the emergency response agencies.

#### **14.0 ROUTINE DECONTAMINATION PROCEDURES**

Routine decontamination procedures are not required for the transfer operations at the facility. The transfer activities are managed in such a way that there is no need for routine decontamination of containers, processing equipment, trucks, and loaders necessary. The reasons for this are as follows:

1. No containers are opened at the Hartford Branch, or in any of the route trucks or transfer trailers;
2. No pumps, vacuum trucks, or roll-offs are utilized. Everything is handled in manageable containers that are DOT acceptable.
3. All containers are inspected to ensure that they are in good condition and that the wastes are compatible with the container in which they are stored.



## **15.0 COORDINATION AGREEMENTS**

Arrangements have been made to familiarize the police department, fire department, and local emergency response teams with the layout of the Hartford Branch, the properties of hazardous wastes handled, associated locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the branch. Copies of the letters to the local police departments, fire department, and hospital are provided in Appendix 2.

**APPENDIX 1**  
**EMERGENCY COORDINATOR AND**  
**EMERGENCY CONTACT INFORMATION**

*This page intentionally left blank.*

**EMERGENCY COORDINATOR CONTACTS**

<p><b>PRIMARY Emergency Coordinator:</b>                  [To Be Determined]                  Branch Manager                  Heritage-Crystal Clean, LLC., Hartford Branch                  94 Murphy Road                  Hartford, CT 06114</p> <p>Home Address:                  [To be determined]</p> <p>Phone:                  [To be determined] (work)                  [To be determined] (cell)                  [To be determined] (home)</p>	<p><b>SECONDARY Emergency Coordinator:</b>                  [To Be Determined]                  Crystal Clean EH&amp;S Manager]                  Heritage-Crystal Clean, LLC., Hartford Branch                  94 Murphy Road                  Hartford, CT 06114</p> <p>Home Address:                  [To be determined]</p> <p>Phone:                  [To be determined] (work)                  [To be determined] (cell)                  [To be determined] (home)</p>
---	--

**EXTERNAL EMERGENCY CONTACTS**

<b>EMERGENCY</b>	<b>ORGANIZATION/AGENCY</b>	<b>EMERGENCY NUMBER</b>	<b>NON-EMERGENCY CONTACT INFORMATION:</b>
<b>Fire/Explosion</b>	Hartford Fire Department	911	275 Pearl Street Hartford, CT 1-860-757-4500
<b>Security</b>	Hartford Police Department	911	50 Jennings Road Hartford, CT 1-860-757-4000
<b>Injury</b>	Ambulance	911	911
	Hartford Hospital	911	80 Seymour Street Hartford, CT 1-860-545-5000
	Connecticut Poison Control Center	1-800-222-1222	1-800-222-1222
<b>Hazmat/Spill</b>	CHEMTREC	1-800-424-9300, "1"	1-800-424-9300, "1"
	National Response Center	1-800-424-8802	1-800-424-8802
	Connecticut Department of Energy and Environment Protection	1-866-DEP-SPIL (1-866-337-7745)	1-866-DEP-SPIL (1-866-337-7745)

**EMERGENCY NOTIFICATION CONTACTS**

Connecticut Department of Energy and Environment Protection	1-866-DEP-SPIL (1-866-337-7745)
National Response Center	1-800-424-8801
Connecticut Department of Public Safety and Fire Departments	911 or 1-860-757-4057 (for non-emergency calls)
Capitol Region Emergency Planning Committee (Local Emergency Planning Committee)	1-860-522-2217 ext. 236

## **SURROUNDING BUSINESS CONTACTS**

Beer & Wine Makers Warehouse  
290 Murray Road  
(860) 247-2969

GQ Associates LLC  
270 Murray Road  
(860) 728-0711

VIP Avionics  
58 Linbergh Drive  
(860) 525-6713

Ryder Truck  
99 Murray Road  
(860) 493-7427

**APPENDIX 2**  
**COORDINATION AGREEMENTS**

*This page intentionally left blank.*

## **TABLE OF CONTENTS**

- I. Coordination Agreement Letter to City of Hartford Department of Emergency Services & Telecommunications (Two Pages)
- II. Coordination Agreement Letter to Hartford Hospital (Two Pages)
- III. Coordination Agreement Letter to Hartford Fire Department (Two Pages)
- IV. Coordination Agreement Letter to Hartford Police Department (Two Pages)
- V. Coordination Agreement Letter to Capitol Region Hazardous Materials Response Team (Two Pages)
- VI. Coordination Agreement Letter to Connecticut State Police (Two Pages)



*This page intentionally left blank.*



May 31, 2013

Department of Emergency Services & Telecommunications  
City of Hartford  
City Hall, 550 Main Street  
Hartford, CT 06103

**Subject: Hazardous Waste Transfer Facility Contingency Plan  
Heritage-Crystal Clean Hartford Branch  
94 Murphy Road, Hartford, Connecticut 06114**

Dear Sir or Madam:

Enclosed is a copy of the Contingency Plan for the above referenced facility. Your organization has been contacted to provide emergency services should the need arise.

Heritage-Crystal Clean intends to continue conducting our operations in a safe and environmentally compliant manner and hope that your services will never be required for our facility. However, in the event of an emergency, you may be called upon to respond. We therefore encourage you to review this contingency plan and to visit our facility to familiarize your staff with our operations.

You may comment on this plan and schedule a visit by contacting:

Ms. Catherine McCord  
Vice President of Environment, Health and Safety,  
Heritage-Crystal Clean, LLC  
2175 Point Blvd., Suite 375, Elgin, IL 60123  
(847) 836-5670  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

PLEASE COMPLETE THE ATTACHED FORM AND RETURN IT IN THE ENCLOSED, STAMPED, SELF-ADDRESSED ENVELOPE. We are required by the state of Connecticut to maintain documentation of all emergency response organization's agreement to respond. Feel free to make any corrections, as needed, on the form.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Catherine A. McCord'.

Catherine McCord  
Vice President, Environment Health and Safety

Enclosures

2175 Point Boulevard -- Suite 375, Elgin, IL 60123  
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U

**Emergency Response Agreement**

On behalf of the City of Hartford Department of Emergency Services & Telecommunications (ES&T), I am indicating our agreement to provide emergency services in accordance with the Heritage-Crystal Clean (HCC) Hartford Branch contingency plan (currently in our possession) and any other contractual agreement we may have with HCC in so far as we have personnel, equipment, and supplies available at the time of the incident. Should our resources be otherwise committed, we will attempt to provide information on alternate emergency response organizations that may be able to provide the needed services.

On behalf of ES&T, I am indicating our consent to provide emergency response services in accordance with the attached agreement. *PLEASE ENCLOSE AGREEMENT.*

On behalf of ES&T, I decline to enter into an emergency response agreement at this time; however, you may call upon us to provide services should the need arise.

ES&T is unable to provide emergency response services to the HCC Hartford Branch facility at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

Department of Emergency Services & Telecommunications  
City of Hartford  
City Hall, 550 Main Street  
Hartford, CT 06103  
911 or (860) 757-4050 (Administrative)



May 31, 2013

Hartford Hospital  
80 Seymour St  
Hartford, CT 06102  
(860) 545-5000

**Subject: Hazardous Waste Transfer Facility Contingency Plan  
Heritage-Crystal Clean Hartford Branch  
94 Murphy Road, Hartford, Connecticut 06114**

Dear Sir or Madam:

Enclosed is a copy of the Contingency Plan for the above referenced facility. Your organization has been contacted to provide emergency services should the need arise.

Heritage-Crystal Clean intends to continue conducting our operations in a safe and environmentally compliant manner and hope that your services will never be required for our facility. However, in the event of an emergency, you may be called upon to respond. We therefore encourage you to review this contingency plan and to visit our facility to familiarize your staff with our operations.

You may comment on this plan and schedule a visit by contacting:

Ms. Catherine McCord  
Vice President of Environment, Health and Safety,  
Heritage-Crystal Clean, LLC  
2175 Point Blvd., Suite 375, Elgin, IL 60123  
(847) 836-5670  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

PLEASE COMPLETE THE ATTACHED FORM AND RETURN IT IN THE ENCLOSED, STAMPED, SELF-ADDRESSED ENVELOPE. We are required by the state of Connecticut to maintain documentation of all emergency response organization's agreement to respond. Feel free to make any corrections, as needed, on the form.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Catherine A. McCord'.

Catherine McCord  
Vice President, Environment Health and Safety

Enclosures

2175 Point Boulevard – Suite 375, Elgin, IL 60123  
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U

## Emergency Response Agreement

On behalf of Hartford Hospital, I am indicating our agreement to provide emergency services in accordance with the Heritage-Crystal Clean (HCC) Hartford Branch contingency plan (currently in our possession) and any other contractual agreement we may have with HCC in so far as we have personnel, equipment, and supplies available at the time of the incident. Should our resources be otherwise committed, we will attempt to provide information on alternate emergency response organizations that may be able to provide the needed services.

On behalf of Hartford Hospital, I am indicating our consent to provide emergency response services in accordance with the attached agreement. *PLEASE ENCLOSE AGREEMENT.*

On behalf of Hartford Hospital, I decline to enter into an emergency response agreement at this time; however, you may call upon us to provide services should the need arise.

Hartford Hospital is unable to provide emergency response services to the HCC Hartford Branch facility at this time.

---

Signature

---

Date

---

Title

Hartford Hospital  
80 Seymour St  
Hartford, CT 06102  
(860) 545-5000



May 31, 2013

Hartford Fire Department  
275 Pearl Street  
Hartford, CT 06103  
911 or (860) 757-4500

**Subject: Hazardous Waste Transfer Facility Contingency Plan  
Heritage-Crystal Clean Hartford Branch  
94 Murphy Road, Hartford, Connecticut 06114**

Dear Sir or Madam:

Enclosed is a copy of the Contingency Plan for the above referenced facility. Your organization has been contacted to provide emergency services should the need arise.

Heritage-Crystal Clean intends to continue conducting our operations in a safe and environmentally compliant manner and hope that your services will never be required for our facility. However, in the event of an emergency, you may be called upon to respond. We therefore encourage you to review this contingency plan and to visit our facility to familiarize your staff with our operations.

You may comment on this plan and schedule a visit by contacting:

Ms. Catherine McCord  
Vice President of Environment, Health and Safety,  
Heritage-Crystal Clean, LLC  
2175 Point Blvd., Suite 375, Elgin, IL 60123  
(847) 836-5670  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

PLEASE COMPLETE THE ATTACHED FORM AND RETURN IT IN THE ENCLOSED, STAMPED, SELF-ADDRESSED ENVELOPE. We are required by the state of Connecticut to maintain documentation of all emergency response organization's agreement to respond. Feel free to make any corrections, as needed; on the form.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Catherine A. McCord'.

Catherine McCord  
Vice President, Environment Health and Safety

Enclosures

2175 Point Boulevard – Suite 375, Elgin, IL 60123  
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U

## Emergency Response Agreement

On behalf of Hartford Fire Department, I am indicating our agreement to provide emergency services in accordance with the Heritage-Crystal Clean (HCC) Hartford Branch contingency plan (currently in our possession) and any other contractual agreement we may have with HCC in so far as we have personnel, equipment, and supplies available at the time of the incident. Should our resources be otherwise committed, we will attempt to provide information on alternate emergency response organizations that may be able to provide the needed services.

On behalf of Hartford Fire Department, I am indicating our consent to provide emergency response services in accordance with the attached agreement. *PLEASE ENCLOSE AGREEMENT.*

On behalf of Hartford Fire Department, I decline to enter into an emergency response agreement at this time; however, you may call upon us to provide services should the need arise.

Hartford Fire Department is unable to provide emergency response services to the HCC Hartford Branch facility at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

Hartford Fire Department  
275 Pearl Street  
Hartford, CT 06103  
911 or (860) 757-4500



May 31, 2013

Hartford Police Department  
Public Safety Complex  
235 High Street  
Hartford, CT 06103

**Subject: Hazardous Waste Transfer Facility Contingency Plan  
Heritage-Crystal Clean Hartford Branch  
94 Murphy Road, Hartford, Connecticut 06114**

Dear Sir or Madam:

Enclosed is a copy of the Contingency Plan for the above referenced facility. Your organization has been contacted to provide emergency services should the need arise.

Heritage-Crystal Clean intends to continue conducting our operations in a safe and environmentally compliant manner and hope that your services will never be required for our facility. However, in the event of an emergency, you may be called upon to respond. We therefore encourage you to review this contingency plan and to visit our facility to familiarize your staff with our operations.

You may comment on this plan and schedule a visit by contacting:

Ms. Catherine McCord  
Vice President of Environment, Health and Safety,  
Heritage-Crystal Clean, LLC  
2175 Point Blvd., Suite 375, Elgin, IL 60123  
(847) 836-5670  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

PLEASE COMPLETE THE ATTACHED FORM AND RETURN IT IN THE ENCLOSED, STAMPED, SELF-ADDRESSED ENVELOPE. We are required by the state of Connecticut to maintain documentation of all emergency response organization's agreement to respond. Feel free to make any corrections, as needed, on the form.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Catherine A. McCord'.

Catherine McCord  
Vice President, Environment Health and Safety

Enclosures

2175 Point Boulevard – Suite 375, Elgin, IL 60123  
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U



### Emergency Response Agreement

On behalf of Hartford Police Department, I am indicating our agreement to provide emergency services in accordance with the Heritage-Crystal Clean (HCC) Hartford Branch contingency plan (currently in our possession) and any other contractual agreement we may have with HCC in so far as we have personnel, equipment, and supplies available at the time of the incident. Should our resources be otherwise committed, we will attempt to provide information on alternate emergency response organizations that may be able to provide the needed services.

On behalf of Hartford Police Department, I am indicating our consent to provide emergency response services in accordance with the attached agreement. *PLEASE ENCLOSE AGREEMENT.*

On behalf of Hartford Police Department, I decline to enter into an emergency response agreement at this time; however, you may call upon us to provide services should the need arise.

Hartford Police Department is unable to provide emergency response services to the HCC Hartford Branch facility at this time.

---

Signature

---

Date

---

Title

Hartford Police Department  
Public Safety Complex  
235 High Street  
Hartford, CT 06103  
911 or (860) 757-4350



May 31, 2013

Connecticut Capitol Region Hazardous Materials Response Team  
c/o Capitol Region Council of Governments  
241 Main Street  
Hartford, CT 06106-5310

**Subject: Hazardous Waste Transfer Facility Contingency Plan  
Heritage-Crystal Clean Hartford Branch  
94 Murphy Road, Hartford, Connecticut 06114**

Dear Sir or Madam:

Enclosed is a copy of the Contingency Plan for the above referenced facility. Your organization has been contacted to provide emergency services should the need arise.

Heritage-Crystal Clean intends to continue conducting our operations in a safe and environmentally compliant manner and hope that your services will never be required for our facility. However, in the event of an emergency, you may be called upon to respond. We therefore encourage you to review this contingency plan and to visit our facility to familiarize your staff with our operations.

You may comment on this plan and schedule a visit by contacting:

Ms. Catherine McCord  
Vice President of Environment, Health and Safety,  
Heritage-Crystal Clean, LLC  
2175 Point Blvd., Suite 375, Elgin, IL 60123  
(847) 836-5670  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

PLEASE COMPLETE THE ATTACHED FORM AND RETURN IT IN THE ENCLOSED, STAMPED, SELF-ADDRESSED ENVELOPE. We are required by the state of Connecticut to maintain documentation of all emergency response organization's agreement to respond. Feel free to make any corrections, as needed, on the form.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink that reads 'Catherine A. McCord'.

Catherine McCord  
Vice President, Environment Health and Safety

Enclosures

2175 Point Boulevard – Suite 375, Elgin, IL 60123  
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U

## Emergency Response Agreement

On behalf of the Connecticut Capitol Region Hazardous Materials Response Team (CRHMRT), I am indicating our agreement to provide emergency services in accordance with the Heritage-Crystal Clean (HCC) Hartford Branch contingency plan (currently in our possession) and any other contractual agreement we may have with HCC in so far as we have personnel, equipment, and supplies available at the time of the incident. Should our resources be otherwise committed, we will attempt to provide information on alternate emergency response organizations that may be able to provide the needed services.

On behalf of CRHMRT, I am indicating our consent to provide emergency response services in accordance with the attached agreement. *PLEASE ENCLOSE AGREEMENT.*

On behalf of CRHMRT, I decline to enter into an emergency response agreement at this time; however, you may call upon us to provide services should the need arise.

CRHMRT is unable to provide emergency response services to the HCC Hartford Branch facility at this time.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

Connecticut Capitol Region Hazardous Materials Response Team  
c/o Capitol Region Council of Governments  
241 Main Street  
Hartford, CT 06106-5310  
(860) 832-3477 (Dispatch)  
(860) 522-2217 (CRCOG)



May 31, 2013

Connecticut State Police  
15 Old Hartford Road  
Colchester, CT 06415  
(860) 537-7500

**Subject: Hazardous Waste Transfer Facility Contingency Plan  
Heritage-Crystal Clean Hartford Branch  
94 Murphy Road, Hartford, Connecticut 06114**

Dear Sir or Madam:

Enclosed is a copy of the Contingency Plan for the above referenced facility. Your organization has been contacted to provide emergency services should the need arise.

Heritage-Crystal Clean intends to continue conducting our operations in a safe and environmentally compliant manner and hope that your services will never be required for our facility. However, in the event of an emergency, you may be called upon to respond. We therefore encourage you to review this contingency plan and to visit our facility to familiarize your staff with our operations.

You may comment on this plan and schedule a visit by contacting:

Ms. Catherine McCord  
Vice President of Environment, Health and Safety,  
Heritage-Crystal Clean, LLC  
2175 Point Blvd., Suite 375, Elgin, IL 60123  
(847) 836-5670  
[catherine.mccord@crystal-clean.com](mailto:catherine.mccord@crystal-clean.com)

PLEASE COMPLETE THE ATTACHED FORM AND RETURN IT IN THE ENCLOSED, STAMPED, SELF-ADDRESSED ENVELOPE. We are required by the state of Connecticut to maintain documentation of all emergency response organization's agreement to respond. Feel free to make any corrections, as needed, on the form.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Catherine A. McCord'.

Catherine McCord  
Vice President, Environment Health and Safety

Enclosures

2175 Point Boulevard – Suite 375, Elgin, IL 60123  
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U

**Emergency Response Agreement**

On behalf of Connecticut State Police, I am indicating our agreement to provide emergency services in accordance with the Heritage-Crystal Clean (HCC) Hartford Branch contingency plan (currently in our possession) and any other contractual agreement we may have with HCC in so far as we have personnel, equipment, and supplies available at the time of the incident. Should our resources be otherwise committed, we will attempt to provide information on alternate emergency response organizations that may be able to provide the needed services.

\_\_\_\_\_

On behalf of Connecticut State Police, I am indicating our consent to provide emergency response services in accordance with the attached agreement. *PLEASE ENCLOSE AGREEMENT.*

\_\_\_\_\_

On behalf of Connecticut State Police, I decline to enter into an emergency response agreement at this time; however, you may call upon us to provide services should the need arise.

\_\_\_\_\_

Connecticut State Police is unable to provide emergency response services to the HCC Hartford Branch facility at this time.

\_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

Connecticut State Police  
15 Old Hartford Road  
Colchester, CT 06415  
(860) 537-7500

Attachment C

Closure Plan

(

(

(

## ATTACHMENT C – CLOSURE PLAN AND COST ESTIMATE

This closure plan is intended to meet the requirements of Connecticut General Statutes (CGS) Section 22a-449(c)-110 and Title 40 Code of Federal Regulation (40 CFR) 270.14(b)(13), 270.14(b)(15), 264.112, 264.178, and 264.197 for closure of the Crystal Clean Hartford Branch. This plan addresses the steps that will be necessary to completely close the facility at the end of its intended operating life, and has been prepared in accordance with current Connecticut DEEP closure plan guidance ("*Draft RCRA Closure Plan Guidance for Treatment, Storage and Disposal Facilities Container Storage Areas and Tank Systems*," dated December 28, 2005). The Crystal Clean Hartford Branch will maintain a copy of the approved closure plan and all revisions to the plan on site.

### P.1 CLOSURE PERFORMANCE STANDARD

This closure plan is designed to meet the requirements of the closure performance standard in 40 CFR 265.111.

This closure plan is designed so that the Hartford Branch can close in a manner that: 1) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous wastes, hazardous waste constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or the atmosphere, 2) minimizes the need for further maintenance or controls, and 3) complies with State and Federal requirements.

The Hartford Branch intends to use best management practices to minimize spills and releases throughout the life of the facility. Good housekeeping will be continuously emphasized in order to simplify closure activities to the extent possible.

Specific procedures to accomplish the above objectives are set forth in the following paragraphs.

### P.2 FACILITY DESCRIPTION

#### **Facility Identification:**

Heritage-Crystal Clean (Crystal Clean)  
Hartford Branch  
EPA ID No. To be determined  
94 Murphy Road  
Hartford, Hartford County, Connecticut 06114  
Phone number to be determined  
41° 44' 28.09" N, 72° 39' 7.70" W

The Crystal Clean Hartford Branch transfer facility will be in a commercially and industrially developed area of Hartford, Connecticut. The transfer facility property is east of Murphy Road and west of the Hartford-Brainard Airport. The transfer facility property includes the southeastern 10,496 square feet of a mixed use commercial and industrial building and 8,600 square feet of adjacent parking lot to the south. Figures P-1 through P-3 depict the topography, boundaries, structures, and land use for the facility property and surrounding area.

Crystal Clean will lease the transfer facility property from its owner, South Meadows No. 6 LLC of Hartford, Connecticut, and will be leased by Crystal Clean. The proposed lease area is also currently empty and vacant. Currently, the only occupant in the mixed use commercial and industrial building is Gexpro Electrical Supply; past occupants included an environmental health laboratory.





**TOPOGRAPHIC SURVEY**  
**OF**  
**NO. 90 MURPHY ROAD**  
**PROPERTY OF**  
**SOUTH MEADOWS No. 6, LLC**  
**SITuated IN THE**  
**TOWN OF HARTFORD,**  
**COUNTY OF HARTFORD,**  
**STATE OF CONNECTICUT**

JULY 14, 2011

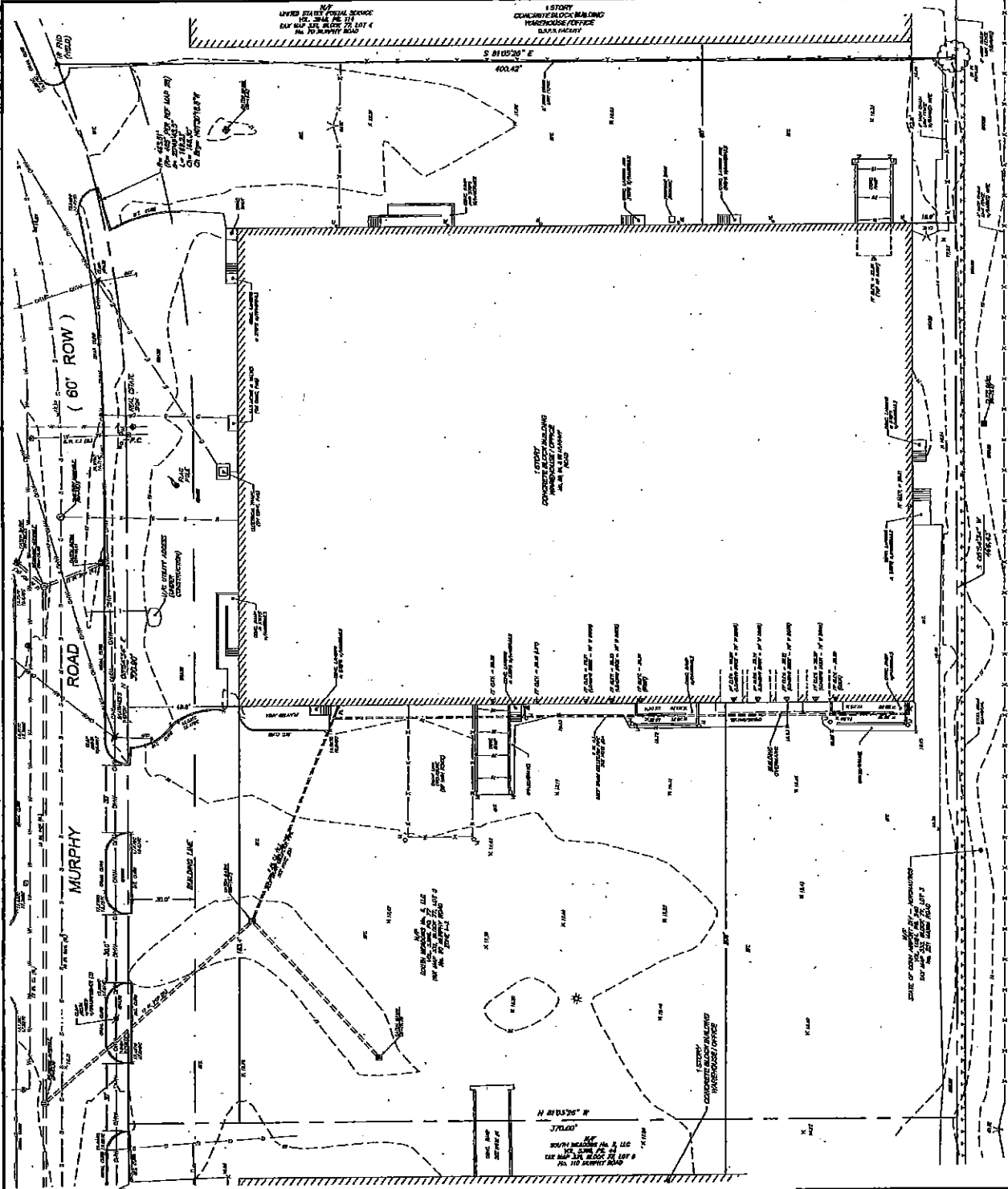
**Figure P-2**

HERITAGE-CRYSTAL CLEAN, LLC  
 2175 POINT BLVD, SUITE 376  
 ELGIN, ILLINOIS 60123

**BSC GROUP**  
 180 Classbury Boulevard  
 Suite 100  
 Cheshire, CT 06025  
 860.582.8227

SCALE: 1" = 20'

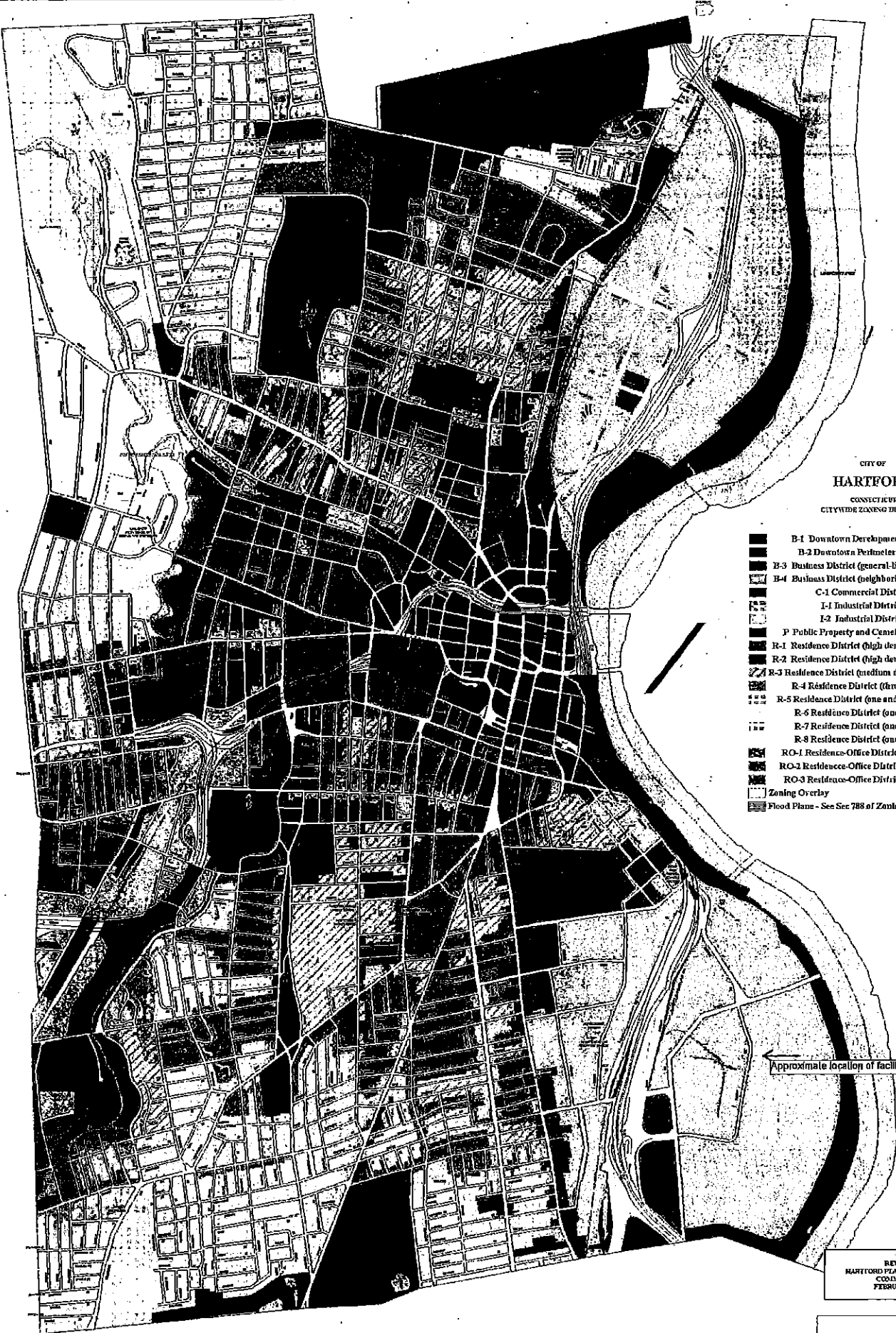
FILE NO. 05482-00 SHEET 2 OF 5



**LEGEND**

- 1. PROPERTY LINE
- 2. EASEMENT
- 3. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 4. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 5. 60' ROW
- 6. MURPHY ROAD
- 7. CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 8. FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 9. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 10. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 11. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 12. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 13. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 14. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 15. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 16. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 17. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 18. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 19. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 20. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 21. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 22. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 23. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 24. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 25. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 26. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 27. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 28. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 29. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 30. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 31. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 32. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 33. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 34. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 35. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 36. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 37. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 38. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 39. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 40. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 41. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 42. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 43. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 44. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 45. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 46. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 47. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 48. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 49. EXISTING CONCRETE BLOCK BUILDING WAREHOUSE OFFICE
- 50. EXISTING FACTORY CONCRETE BLOCK BUILDING WAREHOUSE OFFICE

**Locust Map**



CITY OF  
**HARTFORD**  
 CONNECTICUT  
 CITYWIDE ZONING DISTRICTS

- B-1 Downtown Development District
- B-2 Downtown Perimeter District
- B-3 Business District (general-linear business)
- B-4 Business District (neighborhood business)
- C-1 Commercial District
- I-1 Industrial District
- I-2 Industrial District
- P Public Property and Cemetery District
- R-1 Residence District (high density, 150 PPA)
- R-2 Residence District (high density, 100 PPA)
- R-3 Residence District (medium density, 75 PPA)
- R-4 Residence District (three family)
- R-5 Residence District (one and two-family)
- R-6 Residence District (one-family)
- R-7 Residence District (one-family)
- R-8 Residence District (one-family)
- RO-1 Residence-Office District (300 PPA)
- RO-2 Residence-Office District (225 PPA)
- RO-3 Residence-Office District (75 PPA)
- Zoning Overlay
- Flood Plane - See Sec 788 of Zoning Regs, FIRM Maps

← Approximate location of facility

REVISED TO  
 HARTFORD PLANNING AND ZONING  
 COMMISSION ON  
 FEBRUARY 11, 2008

**FIGURE P-3: ZONING  
 MAP PREPARED BY  
 CITY OF HARTFORD  
 PLANNING DIVISION**

The Crystal Clean Hartford Branch will be one of many Crystal Clean branch locations found throughout the U.S. As a company, Crystal Clean provides parts cleaner equipment, solvent, and services to customers, and collects hazardous and non-hazardous wastes from customers. Crystal Clean also provides other supplies, such as absorbents, storage containers, and cleaning supplies to customers.

Crystal Clean's branch facilities are supported by one of four distribution hubs, located in Philadelphia, Pennsylvania; Atlanta, Georgia; Indianapolis, Indiana; and Shreveport, Louisiana. These distribution hubs receive supplies and parts washer solvents (product) and ship them to branch locations by dedicated trailer trucks.

Crystal Clean branches collect containers of used parts washer solvent and other containerized waste such as paints, solvents, light bulbs, and oily water from customers for recycling and disposal. Small route trucks are based at our branch facilities and are used to provide these services to branch customers in the branch's area of service. The route trucks are used to both deliver materials to customers and pick up used solvents and wastes. These wastes are brought back to the local branch by the route trucks and then transferred to trailer trucks. Trailer trucks then take containers of used solvent, wastes picked up from customers, and parts cleaning equipment requiring refurbishment, back to the branch's supporting distribution hub. These trailer trucks are also known as transfer trailers, because they are used to "transfer" wastes or products from the branches to the distribution hubs. The Crystal Clean Hartford branch will use 2,800-gallon vacuum trucks and 3,650-gallon oil service trucks to collect used oil and oily water from customers for recycling and disposal. The used oil and oily water collected in the vacuum and oil service trucks will be transferred directly to the distribution hub.

The Hartford Branch transfer facility will consist of four loading docks and a paved route truck and transfer trailer holding yard. A 50-foot by 55-foot area (2,750 square feet) outside the building is paved with concrete. This includes the area in which trucks are parked during loading and unloading and where transfer trailers will be parked. The loading docks will be interchangeably used by one trailer of product from the distribution hub, one transfer trailer for containerized wastes, and one route truck. At most, two additional route trucks will be parked in the parking lot at any one time, for a total of one transfer trailer truck and three route trucks. The area where route trucks will be parked while not in use is paved with asphalt. The total waste capacity of one transfer trailer and three route trucks is 8,000 gallons (no more than 1,200 gallons of containerized waste per route truck, and 4,400 gallons of containerized waste in the transfer trailer).

Crystal Clean industrial cleaning solvents (product) supplied to customers include both bulk materials and material packaged in forms designed for sale to end users. Crystal Clean uses a waste qualification process to ensure that all wastes handled are acceptable for the waste management policies and procedures employed by the company. The waste acceptance process requires customers to submit waste profile forms, as well as Material Safety Data Sheets (MSDS), to the Crystal Clean Environment, Health, and Safety department for review and approval. When appropriate, a prequalification sample and laboratory analysis is also required.

Attachment J describes in greater detail the types of waste that will be transferred at the Hartford Branch. In general, these may include aerosol cans, branch-generated waste, bulbs, competitor solvent, computer/electronics, dry cleaner filters/sludges/wastes, gasoline fuel filters, empty gas tanks, absorbents, light ballasts, paint booth filters, and paint sludge/debris/waste. Based on these waste streams, primary chemicals of concern are expected to include volatile organic compounds (VOC), semivolatile organic compounds (SVOC), polychlorinated biphenyls (PCB), and metals.

### **P.3 ENVIRONMENTAL SETTING**

As shown on Figures P-1 and P-2, the transfer facility property is approximately 18 feet above mean sea level. Based on a review of the USGS topographic map and the visual site assessment conducted by Tetra Tech personnel on July 17, 2008, surface water drainage at the subject property likely flows into storm sewers and then follows the area topographic gradient east toward the Connecticut River.

The bedrock of Hartford County is a stratified sequence of Mesozoic sedimentary (primarily sandstone, shale, and conglomerate) rocks and overlies pre-Mesozoic igneous formations. The tilt of the bedrock generally is from the west to east (EDR 2008). Soils on the transfer facility property have been mapped as Urban land association (U. S. Department of Agriculture [USDA] 1984). Urban land soils are highly variable. Urban structures and works cover so much of this land type that identification of the soils is not practical. Most areas have been smoothed and the original soil material has been disturbed, filled over, or otherwise destroyed prior to construction (USDA 1984).

Based on information obtained from the USGS Groundwater Atlas of the United States (USGS 1996), the transfer facility property is located in the New England Upland Section of the New England physiographic province. Aquifers in this province are generally contained in sandstones and primarily are contained in and move through secondary openings, such as joints, fractures, and bedding planes.

Eight federal USGS water wells were identified within a 1 mile radius of the transfer facility property (EDR 2008). Five of the wells are located approximately 0.20 miles south of the subject property; no groundwater level information was reported for these wells. One well is located approximately 0.50 miles southeast of the subject property; EDR reported one groundwater level measurement associated with the well, at a depth of 7 feet below ground surface (bgs), collected in 1935. One well is located approximately 0.75 miles north-northeast of the subject property; EDR reported one groundwater level measurement associated with the well, at a depth of 42 feet bgs, collected in 1955. One well is located approximately 0.75 miles east-southeast of the subject property; EDR reported one groundwater level measurement associated with the well, at a depth of 13 feet bgs, collected in 1965. No state wells or federal public water supply wells were identified within a 1 mile radius of the subject property.

Depth to bedrock, depth to groundwater, and groundwater flow direction beneath the transfer facility property cannot be definitively determined based on the limited well and water level information available. Based on a review of topographic maps, the general topographic gradient in the area of the subject property is downward toward the east. In the absence of site-specific data or other indicators, the direction of shallow or perched groundwater flow can be inferred from the regional topographic slope and is, therefore, inferred to the east.

In the absence of significant exposed soil or a nearby drinking water source, likely potential human exposure pathways in the event of a release include direct contact with or ingestion of hazardous waste or materials, or inhalation of air impacted by hazardous waste or materials. Because containers will not be opened at the transfer facility, the likelihood of a release, even to secondary containment, is minimal.

### **P.4 RCRA PART A STATUS**

A RCRA Part A application is not required for this facility.

### **P.5 OTHER SOURCES OF CONTAMINATION**

The area proposed for use under this permit application currently is zoned as an I-2 Industrial District by the City of Hartford, Connecticut, which prohibits the construction of any residences. An I-2 industrial district is designated for medium to heavy industry characterized by a minimum of noise, odor, glare, and

pollution, and by moderate traffic upon the public streets. The nearest areas zoned for residential occupancy are approximately 5,000 feet west of the property, on the opposite (western) side of Interstate Highway 91 (I-91) (see Appendix F-1).

A search of the U.S Environmental Protection Agency (EPA) databases found 82 EPA-regulated facilities in ZIP code 06114. The list of regulated facilities is included as Table P-1. Nearby facilities include several sewage treatment, recycling, and incineration facilities, all of which have substantially larger operations than the proposed activities at the Crystal Clean Hartford Branch.

**TABLE P-1**

**EPA-REGULATED FACILITIES IN ZIP CODE 06114**

Facility	Permitted Discharges to Water?	Toxic Releases Reported?	Hazardous Waste Handler?	Active or Archived Superfund Report?	Air Releases Reported?
7 ELEVEN 20691, 894 MAPLE AVE	NO	NO	YES	NO	NO
AETNA, 75 BRAINARD RD	NO	NO	YES	NO	NO
AIR ONE, MAXIM ROAD	NO	NO	YES	NO	NO
ALL WASTE INC., 143 MURPHY RD	NO	NO	YES	NO	YES
AMERICAN LINEN SUPPLY COMPANY, 490 WETHERSFIELD AVE	YES	NO	YES	NO	YES
ANNIE FISHER MAGNET SCHOOL, 280 PLAINFIELD ST,	NO	NO	NO	NO	YES
APPLE AUTO BODY & TOWING, 30 AIRPORT RD	NO	NO	NO	NO	YES
BARBOUR SCHOOL, 150 TOWER AVE	NO	NO	NO	NO	YES
BARRIEAU EXPRESS INC, 301 MURPHY RD	NO	NO	YES	NO	NO
BATCHELDER SCHOOL, 757 NEW BRITIAN AVE	NO	NO	NO	NO	YES
BAUMERT SALES CO, INC., 920 MAPLE AVE	NO	NO	YES	NO	NO
BAUMERT SALES COMPANY INCORPORATED, 50 MURPHY ROAD	NO	NO	YES	NO	NO
BEIL-SIMONS COMPANIES, 319 MURPHY RD	NO	NO	NO	NO	YES
BENTON AUTO BODY, INC, 155 FRANKLIN AVE	NO	NO	NO	NO	YES
BRYON'S AUTOBODY, 375 WETHERSFIELD AVE	NO	NO	NO	NO	YES
BULKELEY HIGH SCHOOL, 300 WETHERSFIELD AVENUE	NO	NO	YES	NO	YES
BURR SCHOOL, 400 WETHERSFIELD AVE	NO	NO	NO	NO	YES
CAPITOL TOWERS, INC, 450 - 470 BROAD ST	NO	NO	NO	NO	YES

TABLE P-1

EPA-REGULATED FACILITIES IN ZIP CODE 06114

Facility	Permitted Discharges to Water?	Toxic Releases Reported?	Hazardous Waste Handler?	Active or Archived Superfund Report?	Air Releases Reported?
CASEY FOLSOM, 500 LEDYARD ST	NO	NO	YES	NO	NO
CLARK SCHOOL, 75 CLARK ST	NO	NO	NO	NO	YES
CONN POWER SYSTEMS LLC, 260 MURPHY RD	NO	NO	YES	NO	NO
CORONA S AUTO PARTS, INC, 608 WETHERSFIELD AVE,	NO	NO	YES	NO	NO
CROWN CLEANERS, 297 FRANKLIN AVE	NO	NO	NO	NO	YES
CRRA HARTFORD LANDFILL, 180 LEIBERT ROAD	YES	NO	NO	NO	NO
CT MIL DEPT ORG MAINT SHOP 7, BRAINARD ROAD	NO	NO	YES	NO	NO
D TOX ENVIRONMENTAL CONTRACTORS INC, 83 85 MEADOW ST	NO	NO	YES	NO	NO
ERLES AUTO SERVICE CO INC, 800 MAPLE AVE	NO	NO	YES	NO	NO
FORMER SHELL, 131 BRAINARD RD & INTERSTATE 91	NO	NO	YES	NO	NO
FOUNDRY INC, 440 LEDYARD ST	NO	YES	YES	NO	YES
HARTFORD CITY OF S M PUMPING STA, 1000R WETHERSFIELD AVE	NO	NO	YES	NO	NO
HARTFORD COLT PARK COMMISSION, 106. WETHERSFIELD AVE	NO	NO	YES	NO	NO
HARTFORD PUBLIC HIGH SCHOOL, 55 FOREST ST	NO	NO	NO	NO	YES
HELCO BLDG C/O 266/410 PROPERTIES, 266 PEARL ST	NO	NO	NO	NO	YES
HI G CO SUBSIDIARY OF NYTRONICS, 101 LOCUST ST.	NO	YES	YES	NO	NO
HOOKER SCHOOL, 200 SHERBROOKE AVE, HARTFORD, CT 06114	NO	NO	NO	NO	YES
HPM EASTERN DIVISION, 270 LOCUST STREET	NO	NO	YES	NO	NO
JOHNS AUTO INC, 284 LOCUST ST	NO	NO	YES	NO	NO
LANDERMAN MAX, 295 MURPHY RD	NO	NO	NO	NO	YES
LEDYARD ST AUTOMOTIVE, INC, 65 EAST ELLIOTT ST	NO	NO	NO	NO	YES
LOOMIS ARMORED INC, 75 MAXIM RD	NO	NO	YES	NO	NO

TABLE P-1

EPA-REGULATED FACILITIES IN ZIP CODE 06114

Facility	Permitted Discharges to Water?	Toxic Releases Reported?	Hazardous Waste Handler?	Active or Archived Superfund Report?	Air Releases Reported?
M & S CHROME PLATING INC, 1014 WETHERSFIELD AVE	NO	NO	YES	NO	NO
M.L. KING ELEMENTARY SCHOOL, 25 RIDGEFIELD ST	NO	NO	NO	NO	YES
MAPLE AVE LAUNDROMAT, 901 MAPLE AVE	NO	NO	NO	NO	YES
MARCH TONY BUICK INCORPORATED, 722 WETHERSFIELD AVENUE	NO	NO	YES	NO	NO
METRO AUTO BODY & TOWING, 722 WETHERSFIELD AVE	NO	NO	NO	NO	YES
METROPOLITAN DISTRICT, 240 BRAINARD ROAD	YES	NO	NO	NO	YES
METROPOLITAN DISTRICT, 50 MURPHY ROAD	NO	NO	YES	NO	NO
MID-CT CONTAINER RECYCLING FACILITY, 211 MURPHY RD	YES	NO	NO	NO	YES
MID-CT RESOURCE RECOVERY FACILITY, 300 MAXIM RD	YES	NO	YES	NO	YES
MILLER RECYCLING CORPORATION, 295 HUYSHOPE AVE	NO	NO	NO	NO	YES
MILLION AIR, 58 LINDBERGH DR	NO	NO	YES	NO	NO
MQS INSPECTION INC, 230 MURPHY RD	NO	NO	YES	NO	NO
NEW ENGLAND PETROLEUM LP, 850 MAPLE AVE	NO	NO	NO	NO	YES
NIELSEN HARDWARE CORP, 770 WETHERSFIELD AVE	NO	NO	YES	NO	NO
NORTHEAST PRINTING PLATES INC, 306 MURPHY RD	NO	NO	YES	NO	NO
NUTMEG INTERNATIONAL TRUCKS, 130 BRAINARD RD	NO	NO	YES	NO	NO
O'BARA'S CLASSIC COACH, 241 LEDYARD ST	NO	NO	NO	NO	YES
OLIVERI CORPORATION, 37 AIRPORT ROAD	NO	NO	YES	NO	NO
OMAR COFFEE CO, 555 FRANKLIN AVE	NO	NO	NO	NO	YES
PAMECO CORP, 300 MURPHY RD4	NO	NO	NO	NO	YES
PARTS AMERICA, 560 WEATHERSFIELD	NO	NO	NO	NO	YES
PENSKE TRUCK LEASING, 10 LOCUST ST	NO	NO	YES	NO	NO



TABLE P-1

EPA-REGULATED FACILITIES IN ZIP CODE 06114

Facility	Permitted Discharges to Water?	Toxic Releases Reported?	Hazardous Waste Handler?	Active or Archived Superfund Report?	Air Releases Reported?
PERCY AUTOBODY SERVICE, 247 WALNUT ST	NO	NO	YES	NO	YES
PLASTONICS, INC., 230 LOCUST ST	NO	YES	YES	NO	YES
RELIABLE ELECTRIC MOTOR INC, 285 MURPHY RD	NO	NO	YES	NO	NO
RENO AUTO BODY, 525 FRANKLIN AVE	NO	NO	YES	NO	YES
ROLLINS LEASING CORPORATION, BR #241, 265 MURPHY RD	NO	NO	YES	NO	NO
ROYALE COACHWORKS, 37 AIRPORT RD	NO	NO	NO	NO	YES
RYDER TRUCK RENTAL #0181A, 99 MURPHY RD	NO	NO	YES	NO	NO
SOUTH MEADOW STATION, RESERVE & MAXIM ROADS	NO	NO	YES	NO	NO
SOUTHEND MOTORCARS, INC., 156 FRANKLIN AVE	NO	NO	YES	NO	NO
SOUTHERN NEW ENGLAND TELEPHONE, 40 BRAINARD ROAD	NO	NO	YES	NO	YES
TOMMYS GARAGE, 120 MURPHY RD	NO	NO	YES	NO	NO
TONY V MOTORS, 214 LEDYARD ST	NO	NO	NO	NO	YES
TWAIN SCHOOL, MARK, 395 LYME ST, HARTFORD, CT 06114	NO	NO	NO	NO	YES
UNITED PARCEL SERVICE, 90 LOCUST ST	NO	NO	YES	NO	NO
UNITED REFRIGERATION, 210 MURPHY RD	NO	NO	NO	NO	YES
VANITY CLEANERS, 467 FRANKLIN AVE	NO	NO	YES	NO	YES
VINE ST SCHOOL, 100 VINE ST, HARTFORD, CT 06114	NO	NO	NO	NO	YES
W.E. ANDREWS COMPANY, INC. OF CT, 206 MURPHY RD	NO	NO	YES	NO	NO
WEAVER HIGH SCHOOL, 415 GRANBY ST	NO	NO	NO	NO	YES
YANKEE FURNITURE RESTORATION, 203 NEWFIELD AVE	NO	NO	YES	NO	YES

## **P.6 REMOVAL AND DISPOSAL OF WASTE, EQUIPMENT, STRUCTURES, AND SOIL**

The Hartford Branch anticipates completing closure within 180 days after receipt of the final volume of hazardous wastes. A schedule of closure activities is provided in Section P.9 and Figure P-4 below.

### **P.6.1 Disposal Facility**

All wastes managed at the Hartford Branch will be manifested to a generator-designated final disposal facility. The waste generators will contract with the final disposal facility for disposal costs prior to the Hartford Branch pick-up and transfer. No waste will be transferred through the Hartford Branch that does not have a designated final disposal facility. All containerized wastes transferred at the Hartford Branch are manifested to a final disposal facility. A third party will transport the waste to the final disposal facility designated on the manifest.

### **P.6.2 Disposal or Decontamination of Equipment, Structure, and Soils**

When all containerized wastes have left the facility, the concrete surface will be examined. If any cracks or other gaps are observed, they will be sealed with concrete and epoxy sealant. The following surfaces will be pressure washed with an alkaline detergent and hot water solution followed by a triple rinse:

- The surface of the loading docks
- The pavement in the route truck and transfer trailer parking area.

Any wash waters will be collected and pumped into a container. Depending upon the results of the wash water analysis, the wash waters will be either conveyed to a public wastewater treatment facility or disposed of at a permitted disposal facility. Wash water will be pumped into a container designed for accumulation and storage of wastewater. Containers of decontamination fluid will be staged on the concrete loading dock pending disposal.

### **P.6.3 Disposal of Decontamination Fluids**

A sample of the wash water will be collected and analyzed for full toxicity characteristic leaching procedure (TCLP) and RCRA characteristics.

Depending upon the results of wash water analysis, the wash waters will either be conveyed to a wastewater treatment facility or transported to a permitted disposal facility. Any waste determined to be hazardous will be shipped using a uniform hazardous waste manifest. The permitted disposal facility will be identified based on the nature of the hazard as determined by the TCLP analysis. No significant solid waste will be generated during decontamination procedures, only personal protective equipment (PPE) and other miscellaneous sampling supplies.

### **P.6.4 Health and Safety Considerations**

All personnel directly involved in closure activities will have Level D personal protective equipment available, including coveralls, safety glasses, safety shoes, hard hats, and gloves. Additional personal protective equipment may be necessary depending on the level of contamination encountered. Employee decontamination will be conducted as necessary and will include washing boots, disposing of expendable personal protective equipment such as gloves and dust masks, and hand washing. No additional equipment or personnel decontamination is anticipated.

### **P.6.5 Verification Sampling and Analysis**

The transfer facility will be inspected following decontamination. During this inspection, verification samples will be collected to demonstrate and sampling was adequate. Concrete chip samples will be collected from porous structures in the areas of the transfer facility in which wastes were managed (i.e., Transfer Area, Unloading/Loading Area). One sample will be collected for every 100 square feet (minimum of three samples). Samples collected for VOC analysis will be discrete samples (minimum one sample per waste management area); samples collected for all other analyses will be composite samples (maximum 10 samples per composite). The Transfer Area is 48 feet by 20 feet (960 square feet), and the Loading/Unloading Area is 55 feet by 50 feet (2,750 square feet). For the purpose of the closure cost estimate, the Hartford Branch is assuming:

- Transfer Area: 10 samples for VOC analysis and 1 composite (10-point) sample for Appendix IX analysis (excluding VOCs)
- Loading/Unloading Area: 28 samples for VOC analysis and 3 composite (8- to 10-point) samples for Appendix IX analysis (excluding VOCs)

For the purposes of the closure cost estimate, the Hartford Branch is assuming that samples will be analyzed for the full Appendix IX suite of samples, consistent with permit requirements and the variety of constituents stored at the transfer facility. Analytical results will be compared to the media closure criteria for the facility.

### **P.6.6 Certification of Closure**

Within 60 days of completion of final closure, Crystal Clean will submit certification. The certification will be submitted to the Director of the Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division (WEED). A more detailed description of closure certification is in Section P.7.

## **P.7 REMOVAL AND DECONTAMINATION OF TANK SYSTEMS**

The Hartford Branch does not store any wastes in tanks.

## **P.8 QUALITY ASSURANCE (QA) AND QUALITY CONTROL (QC) PROCEDURES**

### **P.8.1 Roles, Responsibilities, and Qualifications**

#### ***P.8.1.1 Engineer (QA/QC Inspector)***

A Professional Engineer (PE) registered in the State of Connecticut will inspect the transfer area after decontamination. A Connecticut PE will also certify that the facility has been closed in accordance with specifications in the approved closure plan and review the Closure Certification.

The Engineer will function as a QA/QC inspector. He or she should possess adequate formal training and sufficient practical technical and administrative experience to execute and record inspection activities successfully. This should include demonstrated knowledge of specific field practices relating to construction techniques used for hazardous waste land disposal facilities, all codes and regulations concerning material and equipment installation, observation and testing procedures, equipment documentation procedures, and site safety.

### ***P.8.1.2 QA/QC Personnel (QA/QC Coordinator)***

In addition to a review by the PE, any documents submitted to WEED will be reviewed by a QC specialist for overall conformity with QA/QC protocols. This person will function as the QA/QC Coordinator. The Coordinator is responsible to the facility owner/operator but should function independently of the owner/operator, engineer, and contractor.

The Coordinator should possess adequate formal academic training in engineering, engineering geology, or closely associated disciplines and sufficient practical, technical, and managerial experience to successfully oversee and implement construction quality assurance activities for hazardous waste land disposal facilities. Many of the responsibilities of a Coordinator may also require that he or she be a registered PE or the equivalent. Because the Coordinator may have to interrelate with all levels of personnel involved in the project, good communication skills are essential. The Coordinator should be expected to ensure that communication of all quality-related matters is conveyed to and acted upon by the affected organizations.

### ***P.8.1.3 Contractor/Consultant (Closure Manager)***

The contractor/consultant closure manager will be responsible for overseeing decontamination, collection of samples verifying decontamination, and collection of samples of decontamination fluids. This person will also be responsible for documenting all field activities and preparing the Closure Certification, which includes the Closure Documentation Report. The QA/QC Coordinator will ensure that any contractors or consultants conducting field activities and preparing reports have training and experience commensurate with their responsibilities.

## **P.8.2 Project Meetings**

Upon initiation of this closure plan, the contractor/consultant closure manager will devise an operational protocol that establishes the appropriate hierarchy for closing the facility. In devising the operational protocol, the manager will (1) identify the type and characteristics of the wastes and inventory, (2) identify the operational status of all equipment and arrange for necessary repairs, and (3) ensure adequate staffing so that the closure plan schedule is accomplished. This hierarchy will be communicated during a pre-closure meeting with all project, health and safety, and quality staff.

As needed during and following closure, the closure manager may hold additional meetings to discuss any discrepancies from the closure plan and to make any recommendations for corrective actions.

## **P.8.3 Sampling and Chain-of-Custody**

### ***P.8.3.1 QA/QC Samples***

Relevant QA/QC samples will be collected at a rate of at least one per sampling event. QA/QC samples relevant to this sampling investigation are field duplicates, trip blanks, and matrix spike (MS) and matrix spike duplicate (MSD) samples. All QA/QC samples will be submitted for the same analyses as the original samples, except for trip blanks, which will be submitted for VOC analysis only. Acceptance of all laboratory QA/QC samples will be evaluated according to the analytical method. Acceptance of all field QA/QC samples requires that blanks be free of contaminants, and that analytical results from duplicate sample pairs have relative percent differences (RPD) of less than 50 percent.

### **P.8.3.2 Sample Handling, Documentation, and Custody Requirements**

Sample handling, documentation, and custody procedures are established to ensure that quality is maintained throughout the sampling portion of the project.

Upon collection, field staff will transfer the samples to new sample containers provided by the analytical laboratory for the sampling effort. The samples will be identified with unique identifiers. Sample containers will be labeled with the sample identifier, date and time sampled, the sampler's initials, and the requested parameters.

All samples will be placed in a secure field cooler immediately after collection and labeling. An inventory of collected samples will be conducted following sampling to ensure that all samples are present and labeled correctly. Ice will be maintained in the cooler with the sample containers to maintain the sample temperature between 1.0° and 4.0° C until delivery to the laboratory. A temperature blank will be placed in each cooler for temperature verification by the laboratory.

Custody procedures will be instituted throughout the project. These procedures include field custody, laboratory custody, and final evidence file custody. These procedures create an accurate and legally defensible document that can be used to trace possession of a sample from collection through analysis and final disposal. A sample is under a person's custody if any of the following conditions exist:

- the sample is in the person's possession;
- the sample is in the person's view after being in their possession;
- the sample was in the person's possession; or
- the sample was placed in a designated secure area.

One of these conditions will be met at all times to maintain sample custody. Formal custody procedures will begin in the field, as noted in the above sections. The field technician will be responsible for properly completing the sample chain-of-custody (COC) form. The field sampler will sign the COC when relinquishing custody and include the form in an air-tight plastic bag in the sample cooler with the associated samples. Sample coolers will be sealed with a custody seal prior to shipment. The custody seal will be an adhesive-backed tape that easily rips if disturbed. The custody seal will be signed and dated by the field sampler.

Analyses are to be completed by the laboratory within time periods as per the method utilized. The time period is defined as the holding time of the samples. Sample analyses completed within the holding time are assumed to be valid, unless there is some other issue indicated by the laboratory. Samples analyzed after the stated holding time are not valid and must be rejected.

### **P.8.4 Laboratory Analyses**

All laboratory analyses will be conducted using the QA/QC procedures specified in the EPA guidance document *Test Methods for Evaluating Solid Waste (SW-846)*.

## **P.9 CLOSURE SCHEDULE**

Figure P-4 provides the schedule for closure of the Hartford Branch facility. The schedule includes the total time required for final closure. No more than 90 days are anticipated to be required to close the facility, and all closure activities will be completed within 180 days of the approval.

**FIGURE P-4**

**CLOSURE SCHEDULE**

	0	30	60	90
<b>Closure Activity</b>				
1 Initiate Closure	↑			
2 Notify WEED	↑			
3 Prepare Closure Activities	■			
4 Prepare Decontamination Area		■		
5 Decontaminate Loading Dock and Parking Area			■	
6 Sample and Analyze Decontamination Fluid			■	
7 Transport and Dispose of Decontamination Fluid			■	
8 Complete Closure Certification Report				■

**Note:**

All units are calendar days.

**P.9.1 Time for Closure**

Within 30 days after the date on which the Hartford Branch receives the known final volume of hazardous wastes, the Branch will initiate final closure activities. Crystal Clean will notify WEED, to the extent possible, of its intent to begin closure at least 45 days prior to the closure start date. The Hartford Branch anticipates completing closure within 180 days after receipt of the final volume of hazardous wastes.

Within 60 days of completing closure activities, the Hartford Branch will submit a closure certification report from an authorized Crystal Clean representative to WEED. The report will be reviewed and certified by a PE registered in the State of Connecticut.

**P.9.2 Extensions for Closure Time**

The Hartford Branch does not anticipate exceeding the 180-day limit for completing all closure activities, nor does the Hartford Branch anticipate that seasonal conditions will cause significant delays, given the nature of the closure activities. However, if an unanticipated need does develop, Crystal Clean will submit a request to WEED for a revised schedule for closure that justifies the additional time required. If a request is submitted, Crystal Clean will justify it by demonstrating one of the following:

- Closure activities require longer than 180 days
- A reasonable likelihood exists that an individual or group other than the Hartford Branch will recommence operation of the facility within one year
- Closure is incompatible with continued operation, and the Hartford Branch has demonstrated that all steps have and will be taken to prevent threats to human health and the environment from the inactive transfer area.

## P.10 FINANCIAL ASSURANCE AND CLOSURE COST ESTIMATES

The closure cost estimate for the Crystal Clean Hartford Branch is \$66,278. The cost estimate is based on the following assumptions:

- Third-party operators will implement the closure plan using on-site equipment and processes
- No catastrophic releases of widespread contamination have occurred
- Operating records identifying the contents of hazardous waste containers and their designated final disposal facility are available.

The closure cost estimate was developed using U.S. Environmental Protection Agency COSTPRO Closure and Post-Closure Care Cost Estimating Software, which applies the methodology described in EPA's 1987 Guidance Manual: Cost Estimates for Closure and Post-Closure Care Plans (EPA/530-SW87-009). The primary sources of cost information include the Azimuth Group, Ltd. ECHOS (Environmental Cost Handling Options and Solutions) Environmental Remediation Cost Data guide and R.S. Means Company, Inc., Building Construction Cost Data and Means Site Work and Landscape Cost Data guides.

The itemized cost estimate (in 2013\$) is provided in Table P-2, and a detailed cost estimate is provided in Appendix P-1. Crystal Clean will adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument used to comply with financial assurance. This will be done annually during the active life of the facility.

TABLE P-2

### ESTIMATED CLOSURE COSTS

Cost Element	Estimated Cost
Waste Removal	\$596
Dry Sweeping	\$110
Decontamination	\$11,300
Transportation	\$3,702
Sampling and Analysis	\$15,327
Treatment and Disposal	\$30,534
Certification of Closure	\$4,709
<b>Total Closure Cost</b>	<b>\$66,278</b>

A discussion of the Hartford Branch's financial assurance is included in Attachment Q.

## P.11 CERTIFICATION OF CLOSURE

Within 60 days of completing closure activities, the Hartford Branch will submit a closure certification report from an authorized Crystal Clean representative to WEED. The report will be reviewed and certified by a PE registered in the State of Connecticut to demonstrate compliance with the approved closure plan. The closure certification report will include the following:

- A Closure Documentation Report, which will include:
  - The operating status of the facility
  - A description of closure field tasks performed
  - A chronological field log of closure activities

- A description of closure sampling protocols
- A description/discussion of analytical data, including all QA/AC data collected and verification sample results
- A photographic record of closure activities, including each milestone event
- A description of any deviations from the Closure Plan
- PE certification statement
- A withdrawal request for the Part A permit (the Hartford Branch anticipates a complete, rather than a partial, closure)
- An appendix containing laboratory analytical testing results
- An appendix containing a copy of the WEED-approved Closure Plan



*This page intentionally left blank.*

**APPENDIX P-1**

**CLOSURE COST ESTIMATE DETAIL**

*This page intentionally left blank.*

<b>WASTE REMOVAL:</b>	
Maximum capacity of waste (55-gallon drums)	146
Labor and equipment cost per drum (based on worker level of protection D)	\$4.08
<b>TOTAL COST OF WASTE REMOVAL</b>	<b>\$595.78</b>
<b>DRY SWEEP:</b>	
Area (sq ft)	3,710
Area (MSF)	3.7
Labor and equipment per 1,000 sq ft (based on worker level of protection D)	\$29.73
<b>TOTAL COST OF DRY SWEEPING</b>	<b>\$110.01</b>
<b>DECONTAMINATION BY PRESSURE WASHING:</b>	
Area (sq ft) of waste management area	3,710
Work rate to pressure wash per sq ft	0.0405
<i>Number of hours</i>	150.2
Labor and equipment cost per hour (based on worker level of protection D)	\$75.21
<b>TOTAL COST OF DECONTAMINATION</b>	<b>\$11409.98</b>
<b>SAMPLING AND ANALYSIS</b>	
<b>Concrete Chips</b>	
Number of samples	38
Work rate to collect samples per location	1
<i>Number of hours</i>	38
Labor and equipment cost per hour (based on worker level of protection D)	\$86.94
VOC analysis (per sample [38])	\$200.66
Other Appendix IX analyses (per composite sample [4])	\$827.24
<b>Concrete Chip Cost</b>	<b>\$14,237.80</b>
<b>Decontamination Fluid</b>	
Number of samples	1
Work rate to collect samples per location	0.5
<i>Number of hours</i>	0.5
Labor and equipment cost per hour (based on worker level of protection D)	\$105.06
Appendix IX analysis per sample	\$1,062.67
<b>Decontamination Fluid Cost</b>	<b>\$1,088.94</b>
<b>TOTAL SAMPLING AND ANALYSIS COST</b>	<b>\$15,326.74</b>

<b>TRANSPORTATION:</b>	
<b>Drummed Hazardous Waste:</b>	
Maximum amount of waste (55-gal drums)	146
No. of trucks to transport off-site (80 drums per truck)	2
Cost per mile to transport to disposal facility	\$5.99
Distance to disposal facility (miles)	300
<b>Drummed Waste Cost</b>	<b>\$3,596.08</b>
<b>Bulk Liquid:</b>	
Maximum amount of decon fluid generated (gallons)	4,970
No. of trucks to transport off-site (truck capacity of 6,900 gallons)	1
Cost per mile to transport to disposal facility	\$2.13
Distance to disposal facility (miles)	50
<b>Bulk Liquid Cost</b>	<b>\$106.27</b>
<b>TOTAL TRANSPORTATION COST</b>	<b>\$3,702.35</b>
<b>TREATMENT AND DISPOSAL:</b>	
<b>Containerized Liquid Hazardous Waste:</b>	
Volume to be treated and disposed (gallons)	8,000
Specific gravity (g/cm <sup>3</sup> )	1
Density (lb/CY)	1,685
Amount in tons	33.4
Cost per gallon	\$3.45
<b>Containerized Liquid Hazardous Waste Cost</b>	<b>\$27,629.46</b>
<b>Decontamination Water</b>	
Volume to be treated and disposed (gallons)	4,970
Specific gravity (g/cm <sup>3</sup> )	1
Density (lb/CY)	1,685
Amount in tons	20.7
Cost per gallon	\$0.58
<b>Decontamination Water Cost</b>	<b>\$2,904.81</b>
<b>TOTAL COST OF TREATMENT AND DISPOSAL</b>	<b>\$30,534.27</b>
<b>CERTIFICATION OF CLOSURE</b>	
Number of waste management areas to be closed	1
Cost per area	\$4,708.67
<b>TOTAL COST OF CERTIFICATION</b>	<b>\$4,708.67</b>
<b>TOTAL COST OF CLOSURE</b>	<b>\$66,277.78</b>

Attachment D  
Inspection Schedule



## **ATTACHMENT D · INSPECTION SCHEDULE AND LOG**

The Heritage-Crystal Clean (Crystal Clean) Hartford Branch will conduct regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous waste constituents and adversely affect the environment or threaten human health. The information in this section is submitted in accordance with Connecticut General Statutes (CGS) Section 22a-449(c)-110 and Title 40 Code of Federal Regulations (40 CFR) 270.14(b)(5) and 264.15.

### **K.1 INSPECTION SCHEDULING AND FREQUENCY**

Table K-1 presents the proposed schedule and frequency for inspecting the transfer area (including safety and emergency equipment), loading/unloading area, and route truck parking area. The items listed in the table are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. The schedule identifies the types of problems that will be looked for during the inspection.

### **K.2 CORRECTIVE ACTION**

If an inspection reveals that non-emergency maintenance is needed, such maintenance will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately. Hartford Branch personnel will then notify the appropriate authorities per the Contingency Plan (see Attachment L and Appendix L-1) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents into the environment, efforts will be directed toward containing the hazard, removing it, and subsequently decontaminating the affected area. The Contingency Plan contains additional details regarding appropriate steps to be taken in case of an emergency.

### **K.3 INSPECTION RECORDS**

Inspection logs will be maintained for each calendar year and will be stored at the facility. After an inspection, each log sheet will be filed in the designated binder, which provides a case history of each particular item. The inspection log notebooks will always be kept with the inspection schedule at the Hartford Branch. Proposed inspection log sheets are shown as Figure K-1, Figure K-2, and Figure K-3.

### **K.4 SPECIFIC INSPECTION REQUIREMENTS**

The following discussion details specific inspection procedures conducted at the facility on a regular schedule. All inspections and results will be recorded on inspection log sheets and appropriately filed. Completion of specific process inspections will be the responsibility of the Branch Manager or the Branch Manager's designee.

Inspections of the containers managed during the route truck to transfer trailer process will be conducted per the inspection schedule provided in Table K-1. Results of each inspection will be recorded on the inspection log sheet (see Figure K-1, Figure K-2, and Figure K-3). Inspections of safety and security equipment also will be conducted per the inspection schedule provided in Table K-1. Results of these inspections will be recorded on the inspection log sheet entitled "Safety and Emergency Equipment Checklist" (see Figure K-2). Information specified on the proposed log sheets includes the inspector's name, title and signature, date and time of inspection, item of inspection, status of the item, observations,



and the date and nature of repairs and remedial action. To ensure a complete inspection, the inspectors will review a list of problems to look for associated with each item.

If the status of a particular item is unacceptable, appropriate and complete information will be recorded, including date and nature of repairs and remedial action.

**TABLE K-1**  
**INSPECTION SCHEDULE**

<b>Area/Equipment</b>	<b>Specific Item</b>	<b>Types of Problems</b>	<b>Frequency of Inspection</b>
<b>Loading/Unloading Area and Route Truck Parking Area</b>	<b>Ground Surface</b>	Leaks, spills, accumulated precipitation	Daily
	<b>Interior of Trailers</b>	Leaks, spills, staged over 10 days	Daily
	<b>Container Placement</b>	Improper placement; failure to segregate incompatible materials (49 CFR 177.848)	Daily
	<b>Container Seal</b>	Improperly sealed; bungs or lids missing or open	Daily
	<b>Container Condition</b>	Corrosion, deterioration, or bulging	Daily
	<b>Container Labels</b>	Missing or incorrect labels, no date of receipt, date of receipt is over 10 days ago	Daily
	<b>Exterior of Trucks and Trailers</b>	Corrosion, other deterioration	Weekly
	<b>Debris and Refuse</b>	Aesthetics, pathway obstacles	Weekly
	<b>Warning Signs</b>	Damaged, missing, improperly located	Weekly
	<b>Fences and Gates</b>	Deterioration, inoperability	Monthly
<b>Transfer Area</b>	<b>Ground Surface</b>	Leaks, spills	Daily
	<b>Evacuation Routes</b>	Pathway obstructions	Daily
	<b>Debris and Refuse</b>	Aesthetics, pathway obstructions	Weekly
	<b>Warning Signs</b>	Damaged, missing, improperly located	Weekly
	<b>Emergency Eyewash</b>	No/low water pressure	Weekly or After Each Use
	<b>Protective Clothing</b>	Low supply	Weekly or After Each Use
	<b>Respirators</b>	Low supply	Weekly or After Each Use
	<b>Spill Absorbents</b>	Low supply	Weekly or After Each Use
	<b>Fire Extinguishers</b>	Expired certification, low charge, accessibility, seals/tags missing	Monthly or After Each Use
	<b>Entrances and Doors</b>	Deterioration, inoperability	Monthly
	<b>Locks</b>	Sticking, corroded, damaged	Monthly
	<b>Alarm System</b>	Inoperability	Monthly
	<b>Concrete Base</b>	Cracks, uneven settlement, erosion, wet spots	Monthly

**FIGURE K-1**

**DAILY INSPECTION LOG**

Item	Item Inspected? (Yes/No)	Problems/Observations	Corrective Action Taken	Date of Corrective Action
<b>Loading/Unloading Area and Route Truck Parking Area</b>				
<b>Ground Surface</b> (Leaks, spills, accumulated precipitation)				
<b>Interior of Trailers</b> (Leaks, spills, staged over 10 days)				
<b>Container Placement</b> (Improper placement; failure to segregate incompatible materials [49 CFR 177.848])				
<b>Container Seal</b> (Improperly sealed; bungs or lids missing or open)				
<b>Container Condition</b> (Corrosion, deterioration, or bulging)				
<b>Container Labels</b> (Missing or incorrect labels, no date of receipt, date of receipt is over 10 days ago)				
<b>Transfer Area</b>				
<b>Ground Surface</b> (Leaks, spills)				
<b>Evacuation Routes</b> (Pathway obstructions)				
<b>Inspection Date</b>				
<b>Inspection Time</b>	<b>Start:</b>	<b>End:</b>		
<b>Inspector Name</b>				
<b>Inspector Signature</b>				

FIGURE K-2

WEEKLY INSPECTION LOG

Item	Item Inspected? (Yes/No)	Problems / Observations	Corrective Action Taken	Date Of Corrective Action
<b>Loading/Unloading Area and Route Truck Parking Area</b>				
Exterior of Trucks and Trailers (Corrosion, other deterioration)				
Debris and Refuse (Aesthetics, pathway obstructions)				
Warning Signs (Damaged, missing, improperly located)				
<b>Transfer Area</b>				
Debris and Refuse (Aesthetics, pathway obstructions)				
Warning Signs (Damaged, missing, improperly located)				
Emergency Eyewash (No/low water pressure)				
Protective Clothing (Low supply)				
Respirators (Low supply)				
Spill Absorbents (Low supply)				
Inspection Date				
Inspection Time	Start:	End:		
Inspector Name				
Inspector Signature				

**FIGURE K-3**

**MONTHLY INSPECTION LOG**

<b>Item</b>	<b>Item Inspected? (Yes/No)</b>	<b>Problems / Observations</b>	<b>Corrective Action Taken</b>	<b>Date Of Corrective Action</b>
<b>Loading/Unloading Area and Route Truck Parking Area</b>				
<b>Fences and Gates</b> (Deterioration, inoperability)				
<b>Transfer Area</b>				
<b>Fire Extinguishers</b> (Expired certification, low charge, accessibility, seals/tags missing)				
<b>Entrances and Doors</b> (Deterioration, inoperability)				
<b>Locks</b> (Sticking, corroded, damaged)				
<b>Alarm System</b> (Inoperability)				
<b>Concrete Base</b> (Cracks, uneven settlement, erosion, wet spots)				
<b>Inspection Date</b>				
<b>Inspection Time</b>	<b>Start:</b>			<b>End:</b>
<b>Inspector Name</b>				
<b>Inspector Signature</b>				

*This page intentionally left blank.*

Attachment E

Training Plan

(

(

(

## ATTACHMENT E – PERSONNEL TRAINING RECORDS

This section of the permit application outlines Heritage-Crystal Clean's (Crystal Clean) training program for the hazardous waste management activities conducted at the Hartford Branch. It contains information in response to Connecticut General Statutes (CGS) Sections 22a-449(c)-103(d) and 22a-449(c)-110; Title 40 Code of Federal Regulation (40 CFR) 270.14(b)(12) and 264.16; and 49 CFR 172.700.

### N.1 TRAINING PROGRAM CONTENT, FORMAT, AND GOALS

The Hartford Branch Manager, the Branch Sales Manager, and the Vacuum Sales/Service Representative will complete an on-line training program (Training On-line Program, known as TOPs) that includes specific instruction relating to hazardous waste management activities required for operations at the branch. The purpose and goal of the TOPs training program is to provide Crystal Clean employees with the knowledge and skills necessary to successfully perform the activities outlined in this application. The TOPs online training program is a web-based system provided by Fisher Scientific/Pure Safety. Crystal Clean has customized the modules provided by Fisher Scientific/Pure Safety to meet the needs of its facility personnel. In addition to the TOPS training, these personnel will receive training at least monthly through 15-minute live training sessions, safety minutes, and posters. As noted above, the training is provided to the Crystal Clean Branch Manager, the Branch Sales Manager, and the Vacuum Sales/Service Representative, whom would be responsible for waste management and could potentially have to respond to an emergency incident. The training focusing on safety, hazard communications, hazardous materials and hazardous waste management, emergency response, and personal protective equipment. Training topics are below; the training topics with asterisks are in TOPs.

#### Training Topics

- Back Injury Prevention\*
- Fire Prevention and Safety\*
- Flammable Liquid Safety\*
- Forklift/Powered Industrial Truck Safety\*
- Hazard Communication\*
- HazCom Procedures\*
- HazMat Transportation Module 0 – Introduction\*
- HazMat Transportation Module 1 – The Hazardous Materials Table\*
- HazMat Transportation Module 2 – Shipping Papers\*
- HazMat Transportation Module 3a – Packaging\*
- HazMat Transportation Module 3b – Packaging\*
- HazMat Transportation Module 4 – Marking & Labeling\*
- HazMat Transportation Module 5 – Placarding\*
- HazMat Transportation Module 6a – Carrier Requirements – Highway\*
- HazMat Transportation Module 6c – Carrier Requirements – Rail\*
- HazMat Transportation Module 7 – Security Awareness\*
- HAZWOPER Training – Site Control and Decontamination\*
- HAZWOPER Training – Emergency Response & Spill Prevention\*
- Crystal Clean HAZWOPER Information\*
- Understanding HAZWOPER\*
- Emergency Response Plan\*
- Crystal Clean Hartford Branch Contingency Plan
- Crystal Clean Hartford Branch Permit Requirements



- Crystal Clean Driver Safety\*
- Reasonable Suspicion Training for Supervisors\*
- Personal Protective Equipment (PPE) Part 1 – Overview\*
- PPE Part 2 – Head Protection\*
- PPE Part 3 – Eye & Face Protection\*
- PPE Part 4 – Hand & Arm Protection\*
- PPE Part 5 – Body Protection\*
- PPE Part 6 – Foot & Leg Protection\*
- PPE Part 7 – Hearing Conservation Awareness\*
- PPE Part 8 – Respiratory Protection, Awareness Only\*
- PPE Part 9 – Electrical Protective Devices\*
- PPE Part 10 – Levels of Protection\*
- Respiratory Training\*
- RCRA Part 1 – Hazardous Waste\*
- RCRA Part 2 – Waste Generation\*
- Safety Orientation\*
- Yard Spotting\*

Crystal Clean maintains a web-based tracking system for training participation, training due dates, and training in arrears, with Environmental, Health and Safety (EH&S) manager notification and reporting functions by person and branch. Weekly reports of training delivered are sent to Crystal Clean EH&S.

The facility employees (Crystal Clean Branch Manager, the Branch Sales Manager, and the Vacuum Sales/Service Representative) will have limited responsibility to respond to emergency incidents. Their responsibilities include obtaining the spill kits; placing absorbents, booms, etc., to contain the spilled material; or using the fire extinguisher to extinguish small fires. See Appendix N-1 for the associated job descriptions.

## **N.2 TRAINING SCHEDULE**

The TOPs training program is directed and implemented by Crystal Clean's EH&S department. The branch manager and SSR will be required to complete an annual review of their initial training. These employees will also be updated on regulatory changes or Bureau of Waste Management, Waste Engineering and Enforcement Division (WEED)-approved modifications to the hazardous waste permit by the Environment, Health, and Safety department. If new employees are needed to perform hazardous waste management activities, they will receive training within 6 months of starting to perform these activities and will not be allowed to conduct unsupervised hazardous waste management activities until trained.

## **N.3 TRAINING RECORDS**

The Environment, Health, and Safety department will keep records of initial training, annual reviews, and updates for branch employees designated to perform hazardous waste management activities. These records will be kept until closure of the Branch, and for 3 years after any employee leaves Crystal Clean. The records will include the employee's name, job title, job description including qualifications and duties, and the content and dates of the training received. Because the TOPs program is a web-based system, the training records are maintained on the web-based system, and it is accessible from any Crystal Clean computer at any Crystal Clean facility.

**APPENDIX N-1**  
**JOB DESCRIPTIONS**

*This page intentionally left blank.*



**Job Title: Branch Manager**  
**Heritage-Crystal Clean Branch Manager**

**OBJECTIVE REQUIREMENTS**

<b>Education.....</b>	High School Diploma or its equivalent.
<b>Experience.....</b>	Minimum one-year sales experience required. HCC sales experience preferred.
<b>Personal Protective Equipment....</b>	Ability to wear personal protective equipment, including respirator.
<b>Specific Skills.....</b>	Excellent interpersonal skills necessary to effectively communicate with internal and external contacts. Ability and desire to increase sales and maintain a high level of service to the current customer base.

-See Position Classification Information Booklet for ADA Functional Requirements-

**SPECIFIC DUTIES:**

- © **Overall responsibility for sales, growth and facility operations within a specific geographic area as defined by the Company.**
- © Plan, direct and monitor activities of all sales personnel.
- © Responsible for the quality, on-time performance of all customer services assigned to the branch each sales period.
- © Training of all branch personnel including Branch Service Representatives and Branch Sales Managers.
- © Assist or accompany SSR/BSM during sales activities as necessary.
- © Tabulate and report daily, weekly and period sales results to management.
- © Maintain inventory of solvent, allied products and equipment.
- © Adhere to all corporate policies and standards including but not limited to environmental and regulatory, human resources, facility, equipment, operations and maintenance.
- © Performs other related duties as assigned.

	Reports To: HCC Regional Manager
Working Hours: 40+	Company Paid Physical Exam Required: X
	Company Paid Substance Testing Required: X

**BRANCH OFFICE JOB DESCRIPTION**  
**Heritage-Crystal Clean**  
**VACUUM SALES/SERVICE REPRESENTATIVE (VSSR)**

<b>OBJECTIVE REQUIREMENTS</b>	
<b>Education.....</b>	High School Diploma or its equivalent.
<b>Experience.....</b>	Sales experience preferred but not necessary.
<b>Personal Protective Equipment....</b>	Ability to wear personal protective equipment, including respirator.
<b>Specific Skills.....</b>	Excellent interpersonal skills necessary to effectively communicate with internal and external contacts. Ability and desire to provide quality service increase sales. Must meet HCC driver qualifications.

-See Position Classification Information Booklet for ADA Functional Requirements-

**SPECIFIC DUTIES:**

- ⌘ Responsible for customer service and new business development in a certain geographic area as assigned by the Company.
- ⌘ Aligns work orders to minimize mileage and travel time.
- ⌘ Inspects vehicle and equipment for safe operation.
- ⌘ Delivers service to customers by vacuuming approved oily/water waste sludge from customer containment into truck.
- ⌘ Provides allied products as needed and pursues additional services with existing accounts.
- ⌘ Assess potential customer needs, present HCC products and services and develop new customers.
- ⌘ Complete all required paperwork accurately and neatly. Maintain driving log for D.O.T.
- ⌘ Achieve sales quotas for total revenue and new customer development.
- ⌘ Develop sales leads for Data-Marketing.
- ⌘ Adhere to all corporate policies and standards including but not limited to environmental and regulatory, human resources, facility, equipment, operations and maintenance.
- ⌘ Performs other related duties as assigned.

Reports To: HCC Branch Manager

Company Paid Physical Exam Required:

Working Hours: 40+

Company Paid Substance Testing Required:

**BRANCH OFFICE JOB DESCRIPTION**  
**Heritage-Crystal Clean**  
**BRANCH SALES MANAGER (BSM)**

<b>OBJECTIVE REQUIREMENTS</b>	
<b>Education.....</b>	High School Diploma or its equivalent.
<b>Experience.....</b>	Minimum one-year sales experience required. HCC sales experience preferred.
<b>Personal Protective Equipment....</b>	Ability to wear personal protective equipment, including respirator.
<b>Specific Skills.....</b>	Excellent interpersonal skills necessary to effectively communicate with internal and external contacts. Ability and desire to increase sales.

-See Position Classification Information Booklet for ADA Functional Requirements-

**SPECIFIC DUTIES:**

- ↖ Responsible for sales growth and new business development in a certain geographic area as assigned by the Company.
- ↖ Achieve sales quotas for total revenue and new customer development.
- ↖ Develop sales leads for and keeps all appointments assigned by Data-Marketing.
- ↖ Tabulate and report daily, weekly and period sales results to management.
- ↖ Adhere to all corporate policies and standards including but not limited to environmental and regulatory, human resources, facility, equipment, operations and maintenance.
- ↖ Performs other related duties as assigned.

Reports To: HCC Branch Manager

Company Paid Physical Exam Required:

Working Hours: 40+

Company Paid Substance Testing Required:

*This page intentionally left blank.*