

**STATE OF CONNECTICUT**

**V.**

**AEROSPACE TESTING LABORATORY, INC**

**CONSENT ORDER # WSWDH13014**

**Date Issued:**

- A. With the agreement of Aerospace Testing Laboratory, Inc ("Respondent"), the Commissioner of Energy and Environmental Protection ("the Commissioner") finds:
1. Respondent is a Connecticut corporation, which is or has engaged in the business of non-destructive testing on a variety of customer parts at 32 South Satellite Road in South Windsor, Connecticut ("the site").
  2. The Respondent is or has been a generator of hazardous waste.
  3. Staff from the Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division ("WEED") conducted an inspection at the site on August 23, 2012 and September 4, 2012. Based upon the inspection, WEED found that the Respondent failed to:
    - a. Determine whether each waste generated at the site is a hazardous waste as required by Section 22a-449(c)-102(a)(2)(A) of the Regulations of Connecticut State Agencies ("RCSA"); which incorporates by reference 40 CFR 262.11 with specified changes. Specifically, there was no hazardous waste determination done on absorbents which were discarded in the trash.
    - b. Obtain an EPA identification number prior to treating, storing, disposing of, transporting, or offering for transportation, hazardous waste as required by Section 22a-449(c)-102(a)(1) of the RCSA, which incorporates 40 CFR 262.12(a). Specifically, the company did not notify EPA of its hazardous waste activity.
    - c. Obtain a permit from the Commissioner prior to accumulating hazardous waste at the facility for greater than 90 days as required by RCSA 22a-449(c)-102(a)(2)(L), incorporating 40 CFR 262.34(b). Specifically, the company routinely accumulated greater than 1,000 kg (approximately 2,200 lbs) of hazardous waste for approximately one year at a time, prior to shipping the hazardous waste to a destination facility.
    - d. Have facility personnel successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste management requirements as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(4) and 265.16(a) and (b). Specifically, RCRA training was lacking for the following employees: Walter Cormier, Stan Socha, and Giacomo Conforto.

Date Issued: April 15, 2013

- e. Have a contingency plan as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(4) and 265.50 through 265.56. Specifically, there was no contingency plan on site and no contingency plan was given to local police department, fire department, hospitals, State and local emergency response teams to coordinate emergency services when needed.
  - f. Provide each container storage area with a containment system as required by Section 22a-449(c)-102(a)(2)(E) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(1)(i) and 264.175.
  - g. Label or mark containers accumulating hazardous wastes with the words "Hazardous Wastes" and other words that identify the contents as required by Section 22a-449(c)-102(a)(2)(J) of the RCSA, which incorporates by reference 40 CFR 262.34(a)(3) with specified changes. Specifically, the following two 55- gallon drums were not labeled with the words "Hazardous Waste" and their content descriptions: (a) one drum located in the satellite accumulation area; and (b) one drum located in the container storage area.
  - h. Develop and follow a written schedule for inspecting all equipment at the facility that are important to preventing, detecting or responding to environmental or human health hazards as required by Section 22a-449(c)-102(b)(2) of the RCSA, which incorporates by reference 40 CFR 265.15(b)(1). Items that must be inspected include all hazardous waste storage locations and safety and emergency equipment. The inspection report revealed that you have inspected only fire extinguishers.
  - i. Record inspections in a inspection log or summary and keep these records as required by Section 22a-449(c)-102(b)(2) of the RCSA, which incorporates by reference 40 CFR 265.15(d). Inspection records must be kept for at least three years from the date of inspection. At a minimum, these records must include the date and time of inspection, the name of the inspector, a notation of the observations made, and date and nature of any repairs or other remedial actions.
  - j. Prepare and submit a biennial report as required by Section 22a-449(c)-102(a)(2)(AA) of the RCSA, which incorporates 40 CFR 262.41(a) with specified changes. Specifically, you have operated as a Large Quantity Generator of hazardous waste from 2006 to 2012 and did not submit a biennial report by March 1st each year in 2008, 2010 and 2012.
4. On November 6, 2012, WEED issued Notice of Violation No. WSWDHI12131 to the Respondent to correct the violations corresponding to those cited in subparagraphs A.3.a through A.3.j of this consent order.
  5. Based on correspondence submitted to WEED on December 7, 2012 and March 7, 2013, Respondent has corrected the violations corresponding to those listed in subparagraphs A.3.a through A.3.j of this consent order.
  6. By virtue of the above, the Respondent has violated RCSA Section 22a-449(c)-102.
  7. By agreeing to the issuance of this consent order, Respondent makes no admission of fact or law with respect to the matters addressed herein, other than the facts asserted in paragraphs A.1 and A.2 above.

- B. With the agreement of Respondent, the Commissioner, acting under Sections 22a-6, 22a-131, and 22a-449 of the Connecticut General Statutes ("CGS"), orders Respondent as follows:
1. Respondent shall maintain its compliance with all applicable provisions of the Regulations of Connecticut State Agencies Sections 22a-449(c)-100, et. seq., including but not limited to those regulations applicable to generators of hazardous waste.
    - a. Respondent has retained Aquair Environmental Consultants, LLC (AEC) which is a qualified consultant, acceptable to the Commissioner, to prepare the documents and implement or oversee the actions required by this consent order. Respondent shall retain AEC or other qualified environmental consultant acceptable to the Commissioner until this consent order is fully complied with. Within ten (10) days after retaining any consultant other than the one originally identified under this paragraph, Respondent shall notify the Commissioner in writing of the identity of such other consultant. Respondent shall submit to the Commissioner a description of the consultant's education, experience and training which is relevant to the work required by this consent order within **ten (10) days** after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
    - b. On or before **sixty (60) days** after issuance of this consent order, Respondent shall submit for the Commissioner's review and written approval, a plan detailing additional actions and/or operational changes it has undertaken or will undertake to ensure compliance with Connecticut's hazardous waste management regulations RCSA Section 22a-449(c)-100, et. seq., including, but not limited to, those set forth in paragraph A.3. of this consent order. Within **five (5) days** after the Commissioner approves such plan, Respondent shall carry out the plan and maintain it in full effect thereafter.
    - c. On or before **ninety (90) days** after issuance of this consent order, Respondent shall conduct a comprehensive recycling review of the facility to evaluate compliance with Connecticut's recycling laws set forth in CGS Section 22a-241b(d), and shall submit for the Commissioner's review and written approval a Business Recycling Profile documenting the management of recyclable materials at each facility. Refer to the enclosed Business Recycling Profile (Attachment A).
  2. Full compliance. Respondent shall not be considered in full compliance with this consent order until all actions required by this consent order have been completed as approved and to the Commissioner's satisfaction.
  3. Status of Notice of Violation (NOV) No. WSWDH12131. This consent order supersedes Notice of Violation No. WSWDH12131.
  4. Civil penalty. Respondent shall pay a penalty of **ten thousand two hundred twenty dollars (\$10,220)** as the total civil penalty to be sought by the Commissioner for those, and only those, violations described in paragraph A.3 of this consent order. Respondent shall make the penalty payment in two (2) installments. The penalty payment must be made in accordance with the following schedule:
    - a. First payment of **five thousand one hundred ten dollars (\$5,110.00)** is due within thirty (30) days after issuance of this consent order.
    - b. Second payment of **five thousand one hundred ten dollars (\$5,110.00)** is due within 120 days after issuance of this consent order.All payments shall be made in accordance with the protocol described in paragraph B.6 below.
  5. Supplemental Environmental Project. In addition to the penalty referenced in paragraph B.4 above, Respondent has agreed to fund a supplemental environmental project ("SEP") or projects acceptable to the Department according to its February 15, 1996 "Policy on Supplemental Environmental Projects". Therefore, on or before **two hundred ten (210) days** after the date of issuance of this consent order,

Respondent shall pay **ten thousand two hundred twenty dollars (\$10,220)** to the Statewide SEP Account, provided Respondent has not received approval from the Commissioner to perform an alternate SEP. Within **one hundred eighty (180) days** of issuance of the order, Respondent may submit an alternate SEP proposal for the Commissioner's review and written approval. If such approval is received, then the payment to the Statewide SEP Account noted above is limited to the difference between the credited value of the SEP and **ten thousand two hundred twenty dollars (\$10,220)**. The proposed alternative SEP shall be implemented within **sixty (60) days** of the Commissioner's approval of the proposed SEP. Any payments under this paragraph shall be mailed or personally delivered to the Department of Energy and Environmental Protection, Bureau of Financial and Support Services, Accounts Receivable Office, 79 Elm Street, Hartford, Connecticut 06106-5127, and shall be by certified or bank check payable to the "Connecticut Department of Energy and Environmental Protection", with notation thereon "Statewide SEP Account" and the consent order number identified on the first page of this Consent Order. A copy of the check and any transmittal letter shall also be sent to Julie Dutton, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division at the same address.

- a. Respondent shall not claim or represent that any SEP payment made pursuant to this consent order constitutes an ordinary business expense or charitable contribution or any other type of tax deductible expense, and Respondent shall not seek or obtain any other tax benefit such as a tax credit as a result of the payment under this paragraph.
  - b. If and when Respondent disseminates any publicity, including but not limited to any press releases regarding funding a SEP, Respondent shall include a statement that such funding is in partial settlement of an enforcement action brought by the Commissioner.
  - c. If Respondent fails to fully perform any SEP in accordance with paragraph B.5 of this consent order, Respondent shall immediately notify the Commissioner in writing of such noncompliance and shall, upon written request by the Commissioner, remit a payment equal to: the total estimated cost, as determined by the Commissioner, of all such SEP(s); plus either \$2,500 or 10% of such total estimated cost, whichever is greater. Within fourteen (14) days after the date of the Commissioner's written request, Respondent shall make such payment in accordance with the remittance procedures for unexpended SEP funds in paragraph B.5.
6. Payment of penalties. Payment of penalties under this consent order shall be mailed or personally delivered to the Department of Energy and Environmental Protection, Bureau of Financial and Support Services, Accounts Receivable Office, 79 Elm Street, Hartford, CT 06106-5127, and shall be by certified or bank check payable to the "Connecticut Department of Energy and Environmental Protection". The check shall state on its face, "Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division civil penalty", and the consent number identified on the first page of this consent order. A copy of the check and any transmittal letter shall also be sent to Ms. Julie Dutton, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division at the same address.
7. Sampling and sample analyses. All sampling and sample analyses which, are required by this consent order and all reporting of such sample analyses shall be conducted by a laboratory certified by the Connecticut Department of Public Health to conduct such sampling and analyses. All sampling and sample analyses performed under this order shall be performed in accordance with procedures specified or approved in writing by the Commissioner, or, if no such procedures have been specified or approved, in accordance with EPA document SW-846. Unless otherwise specified by the Commissioner in writing, the value of each parameter shall be reported to the maximum level of precision and accuracy specified in the applicable protocol, and if no such level is specified, to the maximum level of precision and accuracy possible.

8. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this consent order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty (30) days of the Commissioner's notice of deficiencies. In approving any document or other action under this consent order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this consent order. Nothing in this paragraph shall excuse noncompliance or delay.
9. Definitions. As used in this consent order, "Commissioner" means the Commissioner or a representative of the Commissioner.
10. Dates. The date of "issuance" of this consent order is the date the consent order is deposited in the U.S. mail or personally delivered, whichever is earlier. The date of submission to the Commissioner of any document required by this consent order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this consent order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is deposited in the U.S. mail or is personally delivered, whichever is earlier. Except as otherwise specified in this consent order, the word "day" as used in this consent order means calendar day. Any document or action which is required by this consent order to be submitted or performed by a date which falls on a Saturday, Sunday or a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.
11. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this consent order shall be signed by Respondent or, if Respondent is not an individual, by Respondent's chief executive officer or a duly authorized representative of such officer, as those terms are defined in §22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and each such individual shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."
12. Noncompliance. This consent order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this consent order may subject Respondent to an injunction and penalties.
13. False statements. Any false statement in any information submitted pursuant to this consent order may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.
14. Notice of transfer; liability of Respondent. Until Respondent has fully complied with this consent order, Respondent shall notify the Commissioner in writing no later than fifteen (15) days after transferring all or any portion of the facility, the operations, the site or the business which is the subject of this consent order or after obtaining a new mailing or location address. Respondent's obligations under this consent order shall not be affected by the passage of title to any property to any other person or municipality.

15. Commissioner's powers. Except as provided hereinabove with respect to payment of civil penalties pursuant to this consent order, nothing in this consent order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for past, present, or future violations of law not otherwise addressed by this consent order. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this consent order have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondent to undertake further investigation or further action to prevent or abate violations or pollution.
16. Respondent's obligations under law. Nothing in this consent order shall relieve Respondent of other obligations under applicable federal, state and local law.
17. No assurance by Commissioner. No provision of this consent order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by Respondent pursuant to this consent order will result in compliance or prevent or abate pollution.
18. Access to site. Any representative of the Department of Energy and Environmental Protection may enter the site without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this consent order.
19. No effect on rights of other persons. This consent order neither creates nor affects any rights of persons or municipalities that are not parties to this consent order.
20. Notice to Commissioner of changes. Within fifteen (15) days of the date Respondent becomes aware of a change in any information submitted to the Commissioner under this consent order, or that any such information was inaccurate or misleading or that any relevant information was omitted, Respondent shall submit the correct or omitted information to the Commissioner.
21. Notification of noncompliance. In the event that Respondent becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this consent order or of any document required hereunder, Respondent shall immediately notify by telephone the individual identified in the next paragraph and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. Within five (5) days of the initial notice, Respondent shall submit in writing the date, time, and duration of the noncompliance and the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and Respondent shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondent shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
22. Submission of documents. Any document required to be submitted to the Commissioner under this consent order shall, unless otherwise specified in this consent order or in writing by the Commissioner, be directed to:

Mr. Denver Dixon, Sanitary Engineer 2  
Bureau of Materials Management and Compliance Assurance  
Waste Engineering and Enforcement Division  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106-5127

Respondent consents to the issuance of this consent order without further notice. The undersigned certifies that he/she is fully authorized to enter into this consent order and to legally bind the Respondent to the terms and conditions of the consent order.

**AEROSPACE TESTING LABORATORY, INC.**

BY:   
(Individual with authority to bind Respondent to terms of consent order)  
NAME: Gary Toper  
TITLE: President  
DATE: 03/28/2013

Issued as a final order of the Commissioner of Energy and Environmental Protection.

  
Macky McCleary  
Deputy Commissioner  
Department of Energy and Environmental Protection

4/12/13  
Date

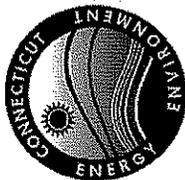
Consent Order No. : WSWDH13014

**ATTACHMENT A**

Business Recycling Profile Form

RECEIVED

APR 02 2013



Connecticut Department of Energy & Environmental Protection

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF MATERIALS MANAGEMENT  
AND COMPLIANCE ASSURANCE  
WASTE ENFORCEMENT AND ENFORCEMENT

# Business Recycling Profile

In Connecticut, recycling is mandatory. Connecticut General Statutes and the Regulations of Connecticut State Agencies require designated items to be recycled by everyone. Every resident, business, government facility, school, college, hospital, institution, etc. is required by law to recycle glass & metal food and beverage containers, plastic containers #1 and #2\*, cardboard\*, corrugated cardboard, magazines\*, newspaper, white office paper, colored office paper\*, scrap metal, Ni-Cd rechargeable batteries, used crankcase oil, lead acid batteries, leaves and grass clippings.

Recycling these items is a critical action we can all take to move the State towards achieving our recycling rate of 58% by 2024 as stated in the amended December 2006 CT State Solid Waste Management Plan. Complying with the state recycling laws has tremendous environmental benefits such as conserving natural resources, reducing pollutants emitted to our air and water, conserving energy, reducing greenhouse gas emissions, and eliminating the need for new solid waste disposal facilities.

This form is a guidance document to help businesses better manage their recycling program and increase recovery efforts. This form does not need to be submitted to the Connecticut Department of Energy and Environmental Protection (DEEP) unless it is requested, in response to an inspection and/or an enforcement action. For more recycling resources please visit our Business Recycling Resources webpage.

## Part I: Company Information

- 1. Company Name: **Aerospace Testing Lab., Inc.**
- Mailing Address: **PO Box 612**
- 2. Recycling Contact: **Walter Cormier**
- Phone(s): **860 882-1575 ext. 223**
- 3. Additional Contact:
- Phone(s):

City/Town: **South Windsor** State: **CT** Zip Code: **06074**  
 Title: **QCM/NDE Level III**  
 Email: **wjcor419@hotmail.com**  
 Title:  
 Email:

## Part II: Facility/Operations

- 1. Type of business: **Service provider**
- 2. Number of buildings: **1**
- 3. Total square footage of building(s) **28,000**

- 4. Acreage of lawn area: **< 1 acre**
- 5. Number of employees: **44**

\*Materials will be designated recyclables in 2012.

**Part II: Facility/Operations (continued)**

6. Current solid waste/recycling hauler(s):

Name: **USA**

Name:

Name:

Phone: **860 746-3200**

Phone:

Phone:

Check here if additional sheets are necessary, and label and attach them to this sheet.

7. Building Owner: **AHS Realty, LLC c/o Allan Schwartz**

Mailing Address: **PO Box 336**

Phone: **860 559-0288**

City/Town: **Marlborough** State: **CT** Zip Code: **06033**

Email: **mdrealtor54@msn.com**

**All Businesses Are Required to Recycle:**

- **High Grade White Office Paper:** White copy paper, computer paper, office stationery, memo paper, etc.
- **High Grade Colored Office Paper\*:** Colored ledger or copy paper
- **Old Corrugated Cardboard:** Old or discarded corrugated boxes – *Not waxed*
- **Boxboard\*:** Including cereal boxes, tissue boxes, or chip board
- **Old Newspaper:** Used or discarded newspapers
- **Magazines\***
- **Plastic containers #1 (PET) and #2 (HDPE)\*:** Bottles and containers
- **Glass & Metal Food and Beverage Containers** (including 5¢ deposit containers)

- **Leaves:** Foliage which has fallen from trees must be recycled
- **Grass Clippings:** Best practice is to recycle grass by leaving grass clippings on the lawn.
- **Used Crankcase Oil:** Used crankcase oil from internal combustion engines
- **Lead Acid Storage Batteries:** Used batteries from cars, airplanes, boats, tractors, etc.
- **Scrap Metal:** Used or discarded items which consist predominantly of metals such as iron, aluminum, brass, copper, lead, chromium, tin, nickel, etc. or alloys of these metals, including but not limited to appliances.
- **Rechargeable Batteries:** Nickel-cadmium (NiCd) rechargeable batteries, both those contained within appliances and those sold individually are required to be recycled after they no longer are usable.

In addition to the state mandated recyclables listed above, check your **local ordinances** to learn about additional materials your business may be required to recycle. **58% by 2024**

\*Materials will be designated recyclables in 2012.

### Part III: Company's Current Recycling & Recovery Efforts

Please use the table below to describe your company's current recycling program. Attachments of photos or other documents are also accepted if you are requested to submit this form.

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH  (if you do not have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
<b>EXAMPLE:</b> OFFICE PAPER (White and other paper combined)	One 40-gallon wheeled cart/week	Everyone collects at their desk, brought to central location (large wheeled cart near elevators). Janitor brings to loading dock when it is full (about once a week)	Our current trash hauler, (NAME) empties our paper recycling wheeled cart 2x/month (We call them as-needed) and material is taken to a permitted recycling facility (PERMITTEE NAME) in (TOWN).
Office paper (white paper)**	1 4cu yd 2x/month	Collected at individual work site in waste basket type	USA empties our 4cu yd container
Office paper (colored paper)**	"	containers or small wheeled containers then put in outside bin as needed.	2 times per month and transports it to thier recycling
Newspaper**	"	"	facility F&G located in E.Windsor CT
Other paper or mixed paper (please list types here)	"	"	"

\*\* Mandatory item that everyone is required to recycle in Connecticut.

**Part III: Company's Current Recycling & Recovery Efforts (continued)**

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH <small>(if you don't have weight data enter the number and size of containers and collection frequency)</small>	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE Old Corrugated Cardboard	We have a 4-yard dumpster behind our main warehouse. It's picked up twice a week.	Warehouse staff collect and flatten boxes as we go along. A small pile is created during a shift (we have 3 shifts/day). At the end of the shift an employee removes the small pile and brings to dumpster outside	Our current trash hauler (NAME) empties cardboard dumpster on Mondays and brings it to a properly permitted facility (PERMITTEE NAME) in (TOWN) for recycling
Corrugated cardboard**			
Boxboard**			
Magazines**			
Food and beverage containers (check all those collected for recycling) <input checked="" type="checkbox"/> Glass** <input checked="" type="checkbox"/> Metal** <input checked="" type="checkbox"/> Plastic 1&2** <input checked="" type="checkbox"/> Paper carton or (juice-type) box			
Other	Light Bulbs	We collect used bulbs	Home Depot

\*\* Mandatory item that everyone is required to recycle in Connecticut until we get a dozen or so.

**Part III: Company's Current Recycling & Recovery Efforts (continued)**

RECYCLABLE MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Printer Toner cartridges	We have 8 printers in our offices and generally replace/recycle 1/month	Office manager returns all toner cartridges to Office Supply Store for a credit towards future office supplies	Use mailer envelopes that come with new toner. We mail them back to Office supply store (or they pick up with new deliveries)
Lead Acid Storage Batteries (car, truck, boat)**	N/A	-	-
Rechargeable Batteries**	N/A	-	-
Used Crankcase Oil**	N/A	-	-
Scrap Metal**	N/A	-	-

\*\* Mandatory item that everyone is required to recycle in Connecticut

**Part III: Company's Current Recycling & Recovery Efforts (continued)**

MATERIAL	AVG WEIGHT (indicate tons or pounds) COLLECTED FOR RECYCLING EACH MONTH  (if you don't have weight data enter the number and size of containers and collection frequency)	HOW & WHERE MATERIAL IS COLLECTED	WHO PICKS-UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING
EXAMPLE: Leaves and other yard debris	N/A	Our landscape company (NAME, TOWN) mows our lawns and maintains our entry garden. They remove all the materials (although grass clippings are left on the lawn).	Our landscape company (NAME) takes them away to a properly permitted recycling facility. (PERMITTEE NAME, LOCATION).
Leaves**	N/A	-	-
Grass clippings**	N/A	-	-
Brush, stumps and other yard debris	N/A	-	-
Food waste	N/A	-	-
Other			
Other			

\*\* Mandatory item that everyone is required to recycle in Connecticut

**Part IV: Company's Current Waste Reduction, Reuse And Other Recovery Programs**

WASTE REDUCTION, REUSE AND OTHER RECOVERY PROGRAMS	PROJECT DESCRIPTION
EXAMPLE: Waste Reduction	Our cafeteria recently began using reusable trays and washing them instead of using Styrofoam trays which we were throwing away. We have also instituted a reusable mug program (providing a free mug to employees) to try and reduce the amount of coffee cup waste.
Waste Reduction	We currently saved all of our printer toners for refill or recycle. Empty Dell toners are shipped back to Dell for reuse as well.
Waste Reduction	
Other	
EXAMPLE: ReUse	Our company generates approximately 10 used Gaylord containers /week that we donate to Foodshare for their produce distribution program. We also donate over-stock and discontinued building supplies to the ReCONstruction Center in New Britain.
ReUse	
ReUse	
Other	
Other	

### Part V: Recycling & Recovery Programs Planned

Please use the table below to describe future recycling efforts and how compliance with the mandatory items, if not already recovered for recycling, will be achieved.

IDEA / MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIAL BE COLLECTED?	WHO WILL PICK-UP THIS MATERIAL? FINAL/END MARKET?	WHEN WILL PROGRAM BE IMPLEMENTED?
<p>EXAMPLE: Food and Beverage containers (glass, metal and plastic)</p>	<p>25 gallons/month</p>	<p>Will place barrel in break room, janitorial staff will empty and remove materials to a larger container on our loading dock.</p>	<p>There are a lot of 5¢ deposit containers. We're looking into having a local non-profit organization collect them for free and redeem the deposits.</p>	<p>We will start this program by August 8, 2008 (2 weeks from now)</p>
<p>EXAMPLE: 55 gallon drums</p>	<p>10/week</p>	<p>We generate 55 gallon drums, which contained non-hazardous substances. We stockpile them outside the plant until we have 50 drums.</p>	<p>Working with XYZ, a company that recycles the drums. We've found this to be more cost effective than recycling them at this time.</p>	<p>We've already started collecting and expect our first pick up to be next week (June 5, 2008)</p>
<p>Deposit Bottles/Cans</p>	<p>~ 100/month</p>	<p>They are collected in a refuge can in our lunch room</p>	<p>We have an employee who we don't let the cans too. She returns them to a local retailer for refund</p>	<p>Has been in place since business began.</p>

**Part V: Recycling & Recovery Programs Planned (continued)**

IDEA / MATERIAL	ESTIMATED GENERATION RATE	HOW AND WHERE WILL THE MATERIAL BE COLLECTED?	WHO WILL PICK-UP THIS MATERIAL? FINAL END MARKET?	WHEN WILL PROGRAM BE IMPLEMENTED?
EXAMPLE: 5 gallon buckets	15-30 <u>buckets/month</u>	We generate buckets (contained non-hazardous substances) and cannot use them. Will rinse and stack (with lids) off to side of loading dock.	We're trying to secure a <u>connection with a local reuse center or distribute via materials exchange program</u>	We hope to start this program by <u>the end of August 2008</u>

**Reminder: This form is only required to be submitted when requested by DEEP.**

**When requested by DEEP**, please include photos of your recycling bins and containers and any copies of recycling/waste contract. If you have additional pages or items to help explain/show successes in your waste recycling/recovery efforts, please attach those as well including brochures, flyers, employee educational materials, etc.

**When requested by DEEP**, please submit the completed form and all Supporting Documents to:

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION  
 BUREAU OF MATERIALS MANAGEMENT & COMPLIANCE ASSURANCE  
 WASTE ENGINEERING AND ENFORCEMENT DIVISION  
 79 ELM STREET, 4<sup>TH</sup> FLOOR  
 HARTFORD, CT 06106-5127

PHONE: (860) 424-3365

# U S A

## HAULING & RECYCLING INC.

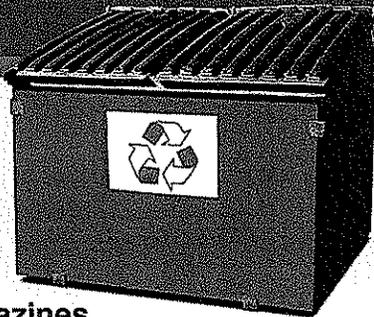
A LOCALLY OWNED & OPERATED BUSINESS SERVING  
OUR CUSTOMER'S NEEDS SINCE 1974



*Go Green with our NEW Commercial  
Single Stream Recycling Program!*

**ALL RECYCLABLES GO IN  
ONE COVERED CONTAINER**

*Join the recycling evolution. For the first time, you can put cans,  
glass, cardboard, plastics & mixed paper in one covered container.*



### Acceptable

- Newspapers/Catalogs/Magazines
- Direct Mail/Envelopes (All Types)
- Paper/Paperboard i.e. Cereal/Shoe Boxes
- Milk & Juice Cartons i.e. Aseptic Packaging
- Cardboard & Brown Paper Bags
- Plastic Bottles & Containers #s 1 thru 7
- Soda/Juice/Water Bottles (Glass or Plastic)
- Food Containers
- Glass Bottles/Jars (Any Color)
- Aluminum Cans and Clean Foil
- Metal Cans (Tin/Steel/Aluminum)

### Unacceptable

- Plastic Bags/Food Liners
- Window Glass/Light Bulbs
- Dishes/Pyrex/Ceramics
- Foam Packaging/Styrofoam
- Hazardous Materials
- No Recyclables Containing Food Waste

[www.usahauling.com](http://www.usahauling.com)

Corporate Office: 15 Mullen Road, Enfield, CT 06082 • 860.746.3200 • 800.998.2984