

**STATE OF CONNECTICUT  
V.  
KITCHENS & BATHS BY CAM, LLC**

**CONSENT ORDER #WSWDH13018**

**Date Issued:** September 16, 2013

- A. With the agreement of Kitchens & Baths by CAM, LLC (“Respondent”), the Commissioner of Energy and Environmental Protection (“the Commissioner”) finds:
1. Respondent is a limited liability company which is or has been engaged in cabinet making and milling at 2 Testa Place in Norwalk, Connecticut (“the site”).
  2. Respondent is or has been a generator of hazardous waste at the site.
  3. Based on the findings of an inspection of the site performed on April 16<sup>th</sup> and 18<sup>th</sup>, 2013:
    - a. Respondent failed to 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 Title 40 of the Code of Federal Regulations (“CFR”) 262.11. Specifically, the Department of Energy and Environmental Protection (“DEEP”) found no evidence indicating hazardous waste determinations were made for spent staining rags, spent paint booth filters, and scrapped overspray materials disposed in the trash.
    - b. Respondent failed to 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 DEEP found that Respondent offered its waste for transportation, as a large quantity generator of hazardous waste accumulating greater than 1,000 kg of hazardous waste on-site, on at least four occasions (i.e., on May 2, 2007, November 14, 2007, June 25, 2008, and January 30, 2013) without an EPA identification number.
    - c. Respondent failed to label or mark each container accumulating hazardous waste with the words “Hazardous Waste” and other words identifying the contents as required by Section 22a-449(c)-102(a)(2)(J) of the RCSA, which incorporates 40 CFR 262.34(a)(3) with specified changes. Specifically, the DEEP found one, 55-gallon steel drum accumulating spent thinner lacked a hazardous waste marker and a description of contents.
    - d. Respondent failed to develop, follow, and maintain a written inspection schedule and log as required by Section 22a-449(c)-102(b)(2) of the RCSA, which incorporates 40 CFR 265.15(b) and (d) with specified changes. Specifically, the DEEP found no written inspection schedule or log on-site.

- e. Respondent failed to conduct personnel training as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, which incorporates 40 CFR 262.34(a)(4) and 40 CFR 265.16. Specifically, the DEEP found no records indicating that any site personnel had received hazardous waste management training.
  - f. Respondent failed to have a contingency plan for the facility as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA which incorporates 40 CFR 262.34(a)(4) and 40 CFR 265.51. Specifically, the DEEP found no hazardous waste management contingency plan available for review at the site.
  - g. Respondent failed to 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, the DEEP found Respondent operated as a large quantity generator of hazardous waste on at least four occasions (i.e., on May 2, 2007, November 14, 2007, June 25, 2008, and January 30, 2013) and has never submitted a biennial report.
4. By virtue of the above, Respondent has violated Section 22a-449(c)-102 of the RCSA.
  5. On June 13, 2013 the DEEP issued Notice of Violation No. WSWDH 13040 to Respondent to correct the violations listed in paragraph A.3 of this consent order.
  6. In correspondence received July 22, 2013, Respondent represented that violations corresponding to those listed in paragraph A.3.b through A.3.g of the consent order have been resolved.
- 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 bring all violations identified in paragraph A.3 above into compliance and maintain its compliance with all the applicable provisions of the RCSA Section 22a-449(c)-100, et. seq., including but not limited to those regulations applicable to generators of hazardous waste identified in paragraph A.3 above, in accordance with the following schedule:
    - a. On or before **thirty (30) days** after the date of issuance of this consent order, Respondent shall retain one or more qualified consultants acceptable to the Commissioner to prepare the documents and implement or oversee the actions required by this consent order. Respondent shall retain such consultants or retain other qualified environmental consultants acceptable to the Commissioner until this consent order is fully complied with, and within **ten (10) days** after retaining any consultants other than those 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 a 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 description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
    - b. On or before **thirty (30) days** after issuance of this consent order, Respondent shall address all comments specified in the attached correspondence letter dated July 30, 2013 from the DEEP to Respondent and submit, for the Commissioner's review and written approval, documentation demonstrating such comments have been addressed.

- c. On or before **ninety (90) days** after the date of 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 to ensure future compliance with the requirements of RCSA Section 22a-449(c)-100, et. seq. Within **ten (10) days** after the Commissioner approves such plan, Respondent shall carry out the plan and maintain it in full effect thereafter.
  - d. 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). On or before **ninety (90) days** after the date of issuance of this consent order, Respondent shall submit for the Commissioner's review and written approval a business recycling profile documenting the management of recyclable materials. Refer to the enclosed example profile.
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 No. WSWDH 13040: This consent order supersedes Notice of Violation No. WSWDH 13040.
  4. Civil penalty. Respondent shall pay a penalty of **five thousand eighty dollars (\$5,080.00)** 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. The penalty shall be paid in two separate installments as follows: Respondent shall remit a payment of three thousand dollars (\$3,000.00) on or before ninety (90) days after the date of issuance of this consent order and a payment of two thousand eighty (\$2,080.00) dollars on or before one hundred eighty (180) days after the date of issuance of this consent order. These penalty payments must be made in accordance with the protocol described in paragraph B.5 below.
  5. 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 order number identified on the first page of this consent order. A copy of the check as well as any transmittal letter shall be mailed or delivered to Julie Dutton, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division at the same address.
  6. 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.

7. 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.
8. Definitions. As used in this consent order, "Commissioner" means the Commissioner or a representative of the Commissioner.
9. 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.
10. 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 Section 22a-430-3(b)(2) of the RCSA, and by the individual(s) responsible for actually preparing such document, and each such individual shall certify in writing as follows:

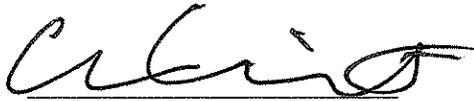
"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate 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."
11. Noncompliance. This consent order is a final order of the Commissioner with respect to the matters addressed herein, and is non-appealable and immediately enforceable. Failure to comply with this consent order may subject Respondent to an injunction and penalties.
12. False statements. Any false statement in any information submitted pursuant to this consent order may be punishable as a criminal offense under Section 53a-157b of the CGS and any other applicable law.
13. 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.

14. Commissioner's powers. Except as provided hereinabove with respect to payment of civil penalties, 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. 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.
15. Respondent's obligations under law. Nothing in this consent order shall relieve Respondent of other obligations under applicable federal, state and local law.
16. 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.
17. 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.
18. 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.
19. 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.
20. 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.
21. 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:

Michelle L. Gore, Sanitary Engineer 3  
Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
Waste Engineering and Enforcement Division  
79 Elm Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106-5127

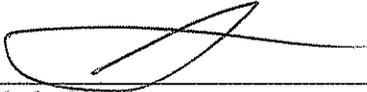
Respondent consents to the issuance of this consent order without further notice. The undersigned certifies that he/she is fully authorized to enter into this consent order and to legally bind the Respondent to the terms and conditions of the consent order.

**KITCHENS & BATHS BY CAM, LLC**

BY:   
Christopher R. Wilmot, Member

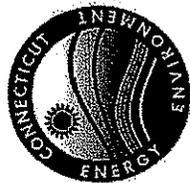
9/6/13  
Date

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

  
Macky McCleary  
Deputy Commissioner

9/13/13  
Date

Consent Order # 94 148 1020088 1898497 104



Connecticut Department of  
Energy & Environmental Protection

# 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:	City/Town:	State:	Zip Code:
Mailing Address:	Title:		
2. Recycling Contact:	Email:		
Phone(s):	Title:		
3. Additional Contact:	Email:		
Phone(s):			

## Part II: Facility/Operations

1. Type of business:	4. Acreage of lawn area::
2. Number of buildings:	5. Number of employees:
3. Total square footage of building(s)	

\*Materials will be designated recyclables in 2012.

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

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

Name: \_\_\_\_\_ Phone: \_\_\_\_\_  
 Name: \_\_\_\_\_ Phone: \_\_\_\_\_  
 Name: \_\_\_\_\_ Phone: \_\_\_\_\_

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

7. Building Owner: \_\_\_\_\_ City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**All Businesses Are Required to Recycle:**

<ul style="list-style-type: none"> <li>• <b>High Grade White Office Paper:</b> White copy paper, computer paper, office stationery, memo paper, etc.</li> <li>• <b>High Grade Colored Office Paper*:</b> Colored ledger or copy paper</li> <li>• <b>Old Corrugated Cardboard:</b> Old or discarded corrugated boxes -- <i>Not waxed</i></li> <li>• <b>Boxboard*:</b> Including cereal boxes, tissue boxes, or chip board</li> <li>• <b>Old Newspaper:</b> Used or discarded newspapers</li> <li>• <b>Magazines*</b></li> <li>• <b>Plastic containers #1 (PET) and #2 (HDPE)*:</b> Bottles and containers</li> <li>• <b>Glass &amp; Metal Food and Beverage Containers</b> (including 5¢ deposit containers)</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Leaves:</b> Foliage which has fallen from trees must be recycled</li> <li>• <b>Grass Clippings:</b> Best practice is to recycle grass by leaving grass clippings on the lawn.</li> <li>• <b>Used Crankcase Oil:</b> Used crankcase oil from internal combustion engines</li> <li>• <b>Lead Acid Storage Batteries:</b> Used batteries from cars, airplanes, boats, tractors, etc.</li> <li>• <b>Scrap Metal:</b> 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.</li> <li>• <b>Rechargeable Batteries:</b> 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.</li> </ul>
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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 <i>(White and other paper combined)</i>	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)**			
Office paper (colored paper)**			
Newspaper**			
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)**

<b>RECYCLABLE MATERIAL</b>	<b>AVG WEIGHT</b> (indicate tons or pounds) <b>COLLECTED FOR RECYCLING EACH MONTH</b> (if you don't have weight data enter the number and size of containers and collection frequency)	<b>HOW &amp; WHERE MATERIAL IS COLLECTED</b>	<b>WHO PICKS UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING</b>
<b>EXAMPLE</b> 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 type="checkbox"/> Glass** <input type="checkbox"/> Metal** <input type="checkbox"/> Plastic 1&2** <input type="checkbox"/> Paper carton or (juice-type) box			
Other			

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

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

<b>RECYCLABLE MATERIAL</b>	<b>AVG WEIGHT</b> (indicate tons or pounds) <b>COLLECTED FOR RECYCLING EACH MONTH</b> (if you don't have weight data enter the number and size of containers and collection frequency)	<b>HOW &amp; WHERE MATERIAL IS COLLECTED</b>	<b>WHO PICKS UP MATERIAL AND WHERE IS THE MATERIAL TAKEN FOR RECYCLING</b>
<b>EXAMPLE:</b> 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)
<b>Lead Acid Storage Batteries (car, truck, boat)**</b>			
<b>Rechargeable Batteries**</b>			
<b>Used Crankcase Oil**</b>			
<b>Scrap Metal**</b>			

\*\* 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 entire 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**			
Grass clippings**			
Brush, stumps and other yard debris			
Food waste			
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
<p><i>EXAMPLE: Waste Reduction</i></p>	<p><i>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.</i></p>
<p>Waste Reduction</p>	
<p>Waste Reduction</p>	
<p>Other</p>	
<p><i>EXAMPLE: ReUse</i></p>	<p><i>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 ReCONNstruction Center in New Britain.</i></p>
<p>ReUse</p>	
<p>ReUse</p>	
<p>Other</p>	
<p>Other</p>	

**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 55 gallon drums being collected. 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>

**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 buckets/month	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 connection with a local reuse center or distribute via materials exchange program.	We hope to start this program by the end of August 2008.

**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