Dace of		# of Containers	<sup>2</sup> Preservation Code	<sup>3</sup> Container Code	Elisaritzad (Johnik, Samplits	O Field Filtered	O Lab to Filter		O Field Filterad	O lah to Filter		<sup>1</sup> Matrix Codes:	GW = Ground Water WW = Waste Water		0 =  Other (please	define)	<sup>2</sup> Preservation Codes:	H = HCL	M = Methanol N = Nitric Acid S Suiteric Acid	B = Sodium Bisulfate	T = Sodium Hydroxide	<ul> <li>Thiosulfate</li> <li>0 = Other (please define)</li> </ul>	<sup>3</sup> Container Codes:	A = Amber Glass G = Glass D - Diactric	ST = Sterile	V = Vial S = Summa Canister	T = Tedtar Bag 0 = Other (nlease	define)		PCB ONLY Soxhlet	Non Soxhlet
242017 39 Spruce Street	East Longmeadow, MA 01028				KLYSIS REQUESTED			<i>ر</i>	2 6 67	1:1 1:1 1:1 1:1	++ , 50 , +3 10+ Hd.	H 1000000000000000000000000000000000000										ndicate possible sample concentration	code column above: .ow; C - Ciean; U - Unknown			<b>CON-CESC</b>	ANALYTICAL LABORATORY www.contestisbs.com		AC and AHA-LAP, LLC Accredited	Other Chromatogram	AIHA-LAP,LLC
ntestlabs.com Doc # 381 Rev 1_03 DDY RECORD	terolund Time	0-Day		ป หลงมหายน		-Day [] ved-		J.	العراد Lined:	Ar cololins in 2	10 +7 8 + 50	N GI NOI NOI NOI NOI NOI NOI NOI NOI NOI NO		h								Please use the following codes to i	within the Cond H - High; M - Medium; L - I	Special Requirements	MPP Fertification Form Domitrod	X CT RCP Required	RCP Certification Form Reguired	A State DW Required	WStD # MBI	unicipality 🗌 MWRA 🗍 WR	1 J School frownfield MBTA
A 0963 CHAIN OF CUSTC		7-Day 10	Due Date:	evolution and	1-Day 3-	· 2-Day _ 4-	Fermat: Dhe 😽 Ev	Other:	CLP Like Data Pkg Regui	Email To(Sho Merrill	Fax To #:	Beginning Ending Composite 6 Date/Time Date/Time	1/22/20 1230										e3 25 M	Therease item 2 in the Wangin Merchanits. Mar			Dro AL 2 1 221	I'LD NE CIFF	ld	Project Entity Government M	Federal 21 City Br
Phone: 413-525-2332 2.C	Fax: 413-525-6405	Email: info@contestlabs.com	I KC.	Ad N Windsor, CT	692	English Station Porcel A	4 Ave, New Haven, CT	00000, 00000	-On180911 Enalize Statia	v per	15410	Citent Sample ID / Description	RC-ADC-1-Sol10-02									Matt Blunstein	203 54	pate/Time.	Date/Time	madily freen	Date/Time:	Date/Time:		Date/Time:	Date/Time:
Con-test	NII]]]] ANALYTICAL LABORATORY	トレイ	e e	Address: 21 Gr.P.F.	Phone: 860 - 298 - 4		Project Location: 910/F(	Project Manager Carl 24	Con-Test Quote Name/Number: 19,	Invoice Recipient: Cor 1 540	sampled By: Matt Blu.	Con-Test Work Order#										comments: Queofrans Call		Relinquished by fsignature)	Received by: (signature)	Sal Mill 58	Relinquished by: (signature)	eceived by: (signature)	150 Pac	distinguished by: (signature)	eceived by: (signature)

l Have Not C Numbers With L Over Sa	onfirmed Sample Co .ab Staff Before Reli mples	ntainer nquishing —	4444	Ψ	CC ANALY Doc# 27	7 Rev 5 201	ABORAT	ORY ORY				
Login Sample	e Receipt Checklist -	(Rejection		ting - Usin	ig Acceptan	ce Policy) A	ny False					
St	atement will be brou	ght to the a	ttention of	the Client	- State True	e or False						
Client TR	<u>C</u>											
Received By	BAC		Date	1122	120	Time	1410					
How were the sam	ples In Cooler	T	No Cooler		On Ice	T	No Ice					
received?	Direct from Sam	pling	- ·		Ambient		Melted Ice					
More complet wit	thin	By Gun #	2		Actual Tem	p- 5,8	-					
Temperature? 2-6	S°C T	By Blank #			Actual Tem	p -		-				
Was Custo	dy Seal Intact?	- nla	We	re Sample	s Tampered	with?	nla	-				
Was COC I	Relinquished ?	T	- Does	s Chain Ag	ree With Sa	mples?	1	_				
Are there brol	ken/leaking/loose cap	s on any sam	iples?	F				-				
Is COC in ink/ Legi	ble? "		Were san	nples recei	ived within h	olding time?	<u> </u>					
Did COC include	all Client	T	Analysis	<u> </u>	Sampl	er Name	T	-				
pertinent Informati	on? Project	T	ID's		Collection	Dates/Time	s	_				
Are Sample labels	filled out and legible?	<u></u>	-	·								
Are there Lab to Fil	ters?	F	-	Who wa	s notified?			_				
Are there Rushes?			-	Who was notified? <u>Alex Ashly Ashley</u>								
Are there Short Hol	lds?		-	Who wa	s notified?	tatie ,	Ashter '	-				
Is there enough Vo	lume?		•			OBL_	.)					
Is there Headspace	where applicable?	<u> </u>	-	MS/MSD?	<u> </u>		<u> </u>					
Proper Media/Cont	ainers Used?		-	Is splitting	samples rec	quired?	t	-				
Were trip blanks re	ceived?	ŕ	-	On COC?	<u> </u>	- D	05-					
Do all samples hav	e the proper pH?		Acid	na	-	Base	11/2	_				
Vials #	Containers:	#			#			#				
Unp-	1 Liter Amb.		1 Liter	Plastic		16 0	z Amb.					
HCL-	500 mL Amb.		500 mL	Plastic		80ZA	mb/Clear	4				
Meon-	250 mL Amb.		250 mL	Plastic		402 AI	mb/Clear					
Bisulfate-	Flashpoint Other Glass		C01./Ba	acteria Dioctio	<u> </u>		mo/Clear					
DI- A			Dinei i Diaetii	- Bag		Erozen:	core	·				
Sulfuric-	Perchlorate		Zinl	ock								
		1	Universit		1	1						
Viale #	Contalpers*		onusea n I	vieura				1 # 1				
Unn-	1 Liter Amb		1 Liter	Plastic		16 0	z Amb.					
HCL-	500 mL Amb.	-	500 mL	Plastic		8oz Ai	mb/Clear					
Meoh-	250 mL Amb.	1	250 mL	Plastic		4oz Ai	mb/Clear					
Bisulfate-	Col./Bacteria		Flash	point		2oz Aı	mb/Clear					
DI-	Other Plastic		Other	Glass		Er	соге					
Thiosulfate-	SOC Kit		Plastic	c Bag		Frozen:						
Sulfuric-	Perchlorate		Zipl	ock								
Comments:												

#### **CT ETPH Discrimination Check**

\*One compound allowed %D</=50

Data File Name B0123006.D Data File Path C:\MSDCHEM\2\DATA\B012320\ Operator RMW Date Acquired 1/23/1920 8:37 Acq. Method File EPH04.M Sample Name ETPH 1500 Instrument Name GCFID2

Name	Ret Time	Target Response	Average Response	*%D+/-20
n-Nonane	1.26	7641398	8596343	11
n-Decane	2.02	7819367	8596343	9
n-Dodecane	3.03	8023410	8596343	7
n-Tetradecane	3.75	8284184	8596343	4
n-Hexadecane	4.37	8455477	8596343	2
n-Octadecane	4.91	8643572	8596343	-1
n-Eicosane	5.46	8804179	8596343	-2
n-Docosane	6.14	8926032	8596343	-4
n-Tetracosane	6.93	9052202	8596343	-5
n-Hexacosane	7.75	9116753	8596343	-6
n-Octacosane	8.49	9159033	8596343	-7
n-Triacontane	9.18	9184649	8596343	-7
n-Dotriacontane	9.82	8867783	8596343	-3
n-Tetratriacontane	10.41	8687712	8596343	-1
n-Hexatriacontane	10.97	8279396	8596343	4

#### **Samples**

20A0445-04RE1 20A0900-01@10X 20A0963-01@400X

1/23/2020 4:06 PM

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### REASONABLE CONFIDENCE PROTOCOL LABORATORY ANALYSIS QA/QC CERTIFICATION FORM

*Laboratory Name:* Con-Test Analytical Laboratory

Project Location: 510A Grand Ave., New Haven, CT

Laboratory Sample ID(s):

20A0963-01

*Client:* TRC Environmental Corporation - CT *Project Number:* 20A0963 *Sample Date(s):* 01/22/2020

List RCP Methods Used:

CTDEP ETPH, SW-846 1311, SW-846 6010D, SW-846 7470A, SW-846 7471B, SW-846 8082A, SW-846 8260C-D, SW-846 8270D-E

1	For each analytical method referenced in this laboratory report package, were all specified QA/QC performance criteria followed, including the requirement to explain any criteria falling outside of acceptable guidelines, as specified in the CTDEP method-specific Reasonable Confidence Protocol documents?	Yes No
1A	Were the method specified preservation and holding time requirements met?	Yes No
1B	VPH and EPH Methods only: Was the VPH and EPH method conducted without significant modifications (see Section 11.3 of respective RCP methods)?	Yes No ✓ N/A
2	Were all samples received by the laboratory in a condition consistent with that described on the associated chain-of-custody document(s)?	Yes No
3	Were samples received at an appropriate temperature (< 6 degrees C.)?	yes □ No N/A
4	Were all QA/QC performance criteria specified in the CTDEP Reasonable Confidence Protocol documents achieved?	Yes 🖌 No
5A	Were reporting limits specified or referenced on the chain-of-custody?	Yes No
5B	Were these reporting limits met?	Yes 🖌 No
6	For each analytical method referenced in this laboratory report package, were results reported for all constituents identified in the method-specific analyte lists presented in the Reasonable Confidence Protocol documents?	Yes Z No
7	Are project-specific matrix spikes and laboratory duplicates included in this data set?	Yes 🖌 No

Notes: For all questions to which the response was "No" (with the exception of question #7), additional information must be provided in an attached narrative. If the answer to question #1, #1A, or #1B is "No", the data package does not meet the requirements for "Reasonable Confidence."

Lisa A. Worthington

This form may not be altered and all questions must be answered.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete.

Authorized Signature:

hisa Worthungton

Position: Technical Representative

Printed Name: Lisa A. Worthington

Date: 01/24/20

Name of Laboratory: Con-Test Analytical Laboratory

This certification form is to be used for RCP methods only.

# Situation #4 Oily Sump Pit Concrete Walls and Floor

## **Concrete Samples**

## Con-Test Report #20B0447



February 13, 2020

Carl Stopper TRC Environmental Corporation - CT 21 Griffin Road North Windsor, CT 06095

Project Location: 510A Grand Ave., New Haven, CT Client Job Number: Project Number: 263951.000028.000001 Laboratory Work Order Number: 20B0447

Enclosed are results of analyses for samples received by the laboratory on February 11, 2020. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Beny K. Millee

Kerry K. McGee Project Manager

## Table of Contents

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TRC Environmental Corporation - CT 21 Griffin Road North Windsor, CT 06095 ATTN: Carl Stopper

REPORT DATE: 2/13/2020

PURCHASE ORDER NUMBER:

PROJECT NUMBER: 263951.000028.000001

ANALYTICAL SUMMARY

WORK ORDER NUMBER: 20B0447

The results of analyses performed on the following samples submitted to the CON-TEST Analytical Laboratory are found in this report.

PROJECT LOCATION: 510A Grand Ave., New Haven, CT

FIELD SAMPLE #	LAB ID:	MATRIX	SAMPLE DESCRIPTION	TEST	SUB LAB
TRC-AOC-1-CO-01 (0-0.5")	20B0447-01	Concrete		CTDEP ETPH	
TRC-AOC-1-CO-02 (0-0.5")	20B0447-02	Concrete		CTDEP ETPH	
TRC-AOC-1-CO-03 (0-0.5")	20B0447-03	Concrete		CTDEP ETPH	
TRC-AOC-1-CO-04 (0-0.5")	20B0447-04	Concrete		CTDEP ETPH	
TRC-AOC-1-CO-05 (0-0.5")	20B0447-05	Concrete		CTDEP ETPH	
EB021120-CO	20B0447-06	Equipment Blank Water		CTDEP ETPH	



#### CASE NARRATIVE SUMMARY

All reported results are within defined laboratory quality control objectives unless listed below or otherwise qualified in this report.

#### CTDEP ETPH

#### **Qualifications:**

S-01

The surrogate recovery for this sample is not available due to sample dilution below the surrogate reporting limit required from high analyte concentration and/or matrix interferences. Analyte & Samples(s) Qualified:

#### 2-Fluorobiphenyl

20B0447-01[TRC-AOC-1-CO-01 (0-0.5")], 20B0447-02[TRC-AOC-1-CO-02 (0-0.5")], 20B0447-04[TRC-AOC-1-CO-04 (0-0.5")], 20B0447-05[TRC-AOC-1-CO-05 (0-0.5")]

The results of analyses reported only relate to samples submitted to the Con-Test Analytical Laboratory for testing.

I certify that the analyses listed above, unless specifically listed as subcontracted, if any, were performed under my direction according to the approved methodologies listed in this document, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, the material contained in this report is, to the best of my knowledge and belief, accurate and complete.

Lua Watthington

Lisa A. Worthington Technical Representative

Page 4 of 19



2-Fluorobiphenyl

2/12/20 14:03

39	9 Spruce	Street * Eas	st Longmeadow.	MA 0	1028 * FAX 4	13/525-6405 * TE	EL. 413/525-2332				
Project Location: 510A Grand Ave., New Haven,	СТ	Sample Descr	ription:					Work Orde	er: 20B0447		
Date Received: 2/11/2020	e Received: 2/11/2020										
Field Sample #: TRC-AOC-1-CO-01 (0-0.5")											
Sample ID: 20B0447-01											
Sample Matrix: Concrete											
			Petroleum I	Hydro	carbons Analys	ses					
								Date	Date/Time		
Analyte	Results	RL	Un	its	Dilution	Flag/Qual	Method	Prepared	Analyzed	Analyst	
СТ ЕТРН	17000	4800	mg/	/Kg	100		CTDEP ETPH	2/11/20	2/12/20 14:03	RDD	

Flag/Qual

S-01

**Recovery Limits** 

50-150

% Recovery

\*



2-Fluorobiphenyl

2/12/20 14:24

39	Spruce	Street * Eas	st Longmeadow. M	A 01028 * I	AX 413/525	5-6405 * T	EL. 413/525-2332			
Project Location: 510A Grand Ave., New Haven, G	CT S	Sample Descr	iption:					Work Ord	er: 20B0447	
Date Received: 2/11/2020	e Received: 2/11/2020									
Field Sample #: TRC-AOC-1-CO-02 (0-0.5")										
Sample ID: 20B0447-02										
Sample Matrix: Concrete										
			Petroleum Hy	drocarbons	Analyses					
								Date	Date/Time	
Analyte	Results	RL	Units	Dilut	on Flag	g/Qual	Method	Prepared	Analyzed	Analyst
СТ ЕТРН	40000	5000	mg/Kg	g 100			CTDEP ETPH	2/11/20	2/12/20 14:24	RDD

Flag/Qual

S-01

**Recovery Limits** 

50-150

% Recovery

\*



2-Fluorobiphenyl

2/12/20 13:23

39 Sp	oruce S	Street * East Lo	ongmeadow, MA (	01028 * FAX 4	13/525-6405 * TE	L. 413/525-2332					
Project Location: 510A Grand Ave., New Haven, CT	Sa	ample Descriptio	n:				Work Ord	er: 20B0447			
Date Received: 2/11/2020	ate Received: 2/11/2020										
Field Sample #:         TRC-AOC-1-CO-03 (0-0.5")         Sampled:         2/11/2020         11:15											
ample ID: 20B0447-03											
Sample Matrix: Concrete											
			Petroleum Hydro	ocarbons Analy	ses						
Augh de la De	14-	DI	T	D'l-4'	Flag/Oscal	Mathad	Date	Date/Time	A		
Analyte Re	sults	RL	Units	Dilution	Flag/Qual	Method	Prepared	Analyzed	Analyst		
CT ETPH 18	800	500	mg/Kg	10		CTDEP ETPH	2/11/20	2/12/20 13:23	RDD		

**Recovery Limits** 

50-150

% Recovery

62.6

Flag/Qual



2-Fluorobiphenyl

2/12/20 14:03

10.0808.080 *										
39 \$	Spruce	Street * Ea	ast Longmeadov	v, MA 0	1028 * FAX 4	13/525-6405 * T	EL. 413/525-2332			
Project Location: 510A Grand Ave., New Haven, C	CT S	Sample Desc	cription:					Work Orde	er: 20B0447	
Date Received: 2/11/2020										
Field Sample #: TRC-AOC-1-CO-04 (0-0.5")	5	Sampled: 2/	/11/2020 11:20							
Sample ID: 20B0447-04										
Sample Matrix: Concrete										
			Petroleun	ı Hydro	carbons Analy	ses				
								Date	Date/Time	
Analyte	Results	RL	ι	J <b>nits</b>	Dilution	Flag/Qual	Method	Prepared	Analyzed	Analyst
СТ ЕТРН	6400	990	m	ng/Kg	20		CTDEP ETPH	2/11/20	2/12/20 14:03	RDD

Flag/Qual

S-01

**Recovery Limits** 

50-150

% Recovery

\*



2-Fluorobiphenyl

2/12/20 13:43

39 Spruce Street * East Longmeadow, MA 01028 * FAX 413/525-6405 * TEL. 413/525-2332											
Project Location: 510A Grand Ave., New Haven, G	CT S	ample Descri	iption:					Work Orde	er: 20B0447		
Date Received: 2/11/2020											
Field Sample #: TRC-AOC-1-CO-05 (0-0.5") Sampled: 2/11/2020 11:25											
Sample ID: 20B0447-05											
Sample Matrix: Concrete											
			Petroleum 1	Hydro	carbons Analys	ses					
								Date	Date/Time		
Analyte	Results	RL	Un	nits	Dilution	Flag/Qual	Method	Prepared	Analyzed	Analyst	
СТ ЕТРН	25000	4800	mg	/Kg	100		CTDEP ETPH	2/11/20	2/12/20 13:43	RDD	

Flag/Qual

S-01

**Recovery Limits** 

50-150

% Recovery

\*

2/12/20 13:03



Surrogates

2-Fluorobiphenyl

39 Sp	ruce S	treet * East I	Longmeadow, MA	01028 * FAX 4	13/525-6405 * TE	EL. 413/525-2332			
Project Location: 510A Grand Ave., New Haven, CT	Sa	mple Descript	tion:				Work Orde	er: 20B0447	
Date Received: 2/11/2020									
Field Sample #: EB021120-CO									
Sample ID: 20B0447-06									
Sample Matrix: Equipment Blank Water									
			Petroleum Hydr	ocarbons Analy	vses				
							Date	Date/Time	
Analyte Res	sults	RL	Units	Dilution	Flag/Qual	Method	Prepared	Analyzed	Analyst
CT ETPH N	ID	0.15	mg/L	1		CTDEP ETPH	2/11/20	2/12/20 13:03	RDD

**Recovery Limits** 

50-150

% Recovery

82.7

Flag/Qual



#### Sample Extraction Data

#### Prep Method: SW-846 3546-CTDEP ETPH

Lab Number [Field ID]	Batch	Initial [g]	Final [mL]	Date
20B0447-01 [TRC-AOC-1-CO-01 (0-0.5")]	B252018	6.22	1.00	02/11/20
20B0447-02 [TRC-AOC-1-CO-02 (0-0.5")]	B252018	6.00	1.00	02/11/20
20B0447-03 [TRC-AOC-1-CO-03 (0-0.5")]	B252018	6.00	1.00	02/11/20
20B0447-04 [TRC-AOC-1-CO-04 (0-0.5")]	B252018	6.05	1.00	02/11/20
20B0447-05 [TRC-AOC-1-CO-05 (0-0.5")]	B252018	6.30	1.00	02/11/20

#### Prep Method: SW-846 3510C-CTDEP ETPH

Lab Number [Field ID]	Batch	Initial [mL]	Final [mL]	Date
20B0447-06 [EB021120-CO]	B252001	1000	1.00	02/11/20



#### QUALITY CONTROL

#### Petroleum Hydrocarbons Analyses - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B252001 - SW-846 3510C										
Blank (B252001-BLK1)				Prepared: 02	2/11/20 Anal	yzed: 02/12/2	20			
СТ ЕТРН	ND	0.15	mg/L							
Surrogate: 2-Fluorobiphenyl	0.0904		mg/L	0.100		90.4	50-150			
LCS (B252001-BS1)	Prepared: 02/11/20 Analyzed: 02/12/20									
СТ ЕТРН	0.693	0.15	mg/L	1.00		69.3	60-120			
Surrogate: 2-Fluorobiphenyl	0.0856		mg/L	0.100		85.6	50-150			
LCS Dup (B252001-BSD1)	Dup (B252001-BSD1) Prepared: 02/11/20 Analyzed: 02/12/20									
СТ ЕТРН	0.695	0.15	mg/L	1.00		69.5	60-120	0.305	30	
Surrogate: 2-Fluorobiphenyl	0.0818		mg/L	0.100		81.8	50-150			
Batch B252018 - SW-846 3546										
Blank (B252018-BLK1)				Prepared: 02	2/11/20 Anal	yzed: 02/12/2	20			
СТ ЕТРН	ND	50	mg/Kg							
Surrogate: 2-Fluorobiphenyl	13.8		mg/Kg	16.7		82.5	50-150			
LCS (B252018-BS1)				Prepared: 02	2/11/20 Anal	yzed: 02/12/2	20			
СТ ЕТРН	124	50	mg/Kg	167		74.6	60-120			
Surrogate: 2-Fluorobiphenyl	13.2		mg/Kg	16.7		79.1	50-150			
LCS Dup (B252018-BSD1)				Prepared: 02	2/11/20 Anal	yzed: 02/12/2	20			
СТ ЕТРН	124	50	mg/Kg	167		74.2	60-120	0.551	30	
Surrogate: 2-Fluorobiphenyl	13.6		mg/Kg	16.7		81.7	50-150			



#### FLAG/QUALIFIER SUMMARY

- \* QC result is outside of established limits.
- † Wide recovery limits established for difficult compound.
- Wide RPD limits established for difficult compound.
- # Data exceeded client recommended or regulatory level
- ND Not Detected
- RL Reporting Limit is at the level of quantitation (LOQ)
- DL Detection Limit is the lower limit of detection determined by the MDL study
- MCL Maximum Contaminant Level

Percent recoveries and relative percent differences (RPDs) are determined by the software using values in the calculation which have not been rounded.

No results have been blank subtracted unless specified in the case narrative section.

S-01 The surrogate recovery for this sample is not available due to sample dilution below the surrogate reporting limit required from high analyte concentration and/or matrix interferences.



	CERTIFICATIONS
Certified Analyses included in this Report	
Analyte	Certifications
CTDEP ETPH in Soil	
СТ ЕТРН	СТ
CTDEP ETPH in Water	
СТ ЕТРН	СТ

The CON-TEST Environmental Laboratory operates under the following certifications and accreditations:

Code	Description	Number	Expires
AIHA	AIHA-LAP, LLC - ISO17025:2017	100033	03/1/2022
MA	Massachusetts DEP	M-MA100	06/30/2020
СТ	Connecticut Department of Public Health	PH-0567	09/30/2021
NY	New York State Department of Health	10899 NELAP	04/1/2020
NH-S	New Hampshire Environmental Lab	2516 NELAP	02/5/2021
RI	Rhode Island Department of Health	LAO00112	12/30/2020
NC	North Carolina Div. of Water Quality	652	12/31/2020
NJ	New Jersey DEP	MA007 NELAP	06/30/2020
FL	Florida Department of Health	E871027 NELAP	06/30/2020
VT	Vermont Department of Health Lead Laboratory	LL015036	07/30/2020
ME	State of Maine	2011028	06/9/2021
VA	Commonwealth of Virginia	460217	12/14/2020
NH-P	New Hampshire Environmental Lab	2557 NELAP	09/6/2020
VT-DW	Vermont Department of Health Drinking Water	VT-255716	06/12/2020
NC-DW	North Carolina Department of Health	25703	07/31/2020
PA	Commonwealth of Pennsylvania DEP	68-05812	06/30/2020

	Page of	# of Containers	<sup>2</sup> Preservation Code	<sup>3</sup> Container Code		O Field Filtered	O Lab to Filter	Surface and house on the	O Field Filtered	O Lab to Filter		<sup>1</sup> Matrix Codes: GW = Ground Water	WW = Waste Water DW = Drinking Water	A = Air S = Soit	SL = Sludge SOL = Solid	0 = Other (please	CONCRETE	<sup>2</sup> <u>Preservation Codes</u> : 1 = load	M = Methanol	N = Nitric Acid S = Sulfuric Acid	B = Sodium Bisulfate	- I niosuirate 0 = Other (please define)		<sup>3</sup> <u>Container Codes:</u> A = Amher Glass	G = Glass P = Plastic	ST = Sterile	v = viat S = Summa Canister	T = Tedlar Bag O = Other (please	define)		PCB ONLY Soxhiet	Non Soxhlet
017	39 Spruce Street East Longmeadow, MA 01028				SIS REQUESTED																	ate possible sample concentration	le column above:	; C - Ctean; U - Unknown		" tota		AMALYTICAL LABORATORY www.contestlaba.com		and AHA-LAP_LLC Accredited	Other	AIHA-LAP, LLC
Doc # 381 Rev 1_03242(	, y dd			4	ANALY				+	-1d		Ē	×	     	×	×	×	×				he following codes to indic	within the Conc Cod	łigh; M - Medium; L - Low	ements PD Docurroot	Form Required	3CP Required	Form Required	DW Required	NELAC	] MWRA [] WRTA	School MBTA
<u>ww.contestlabs.com</u>	CUSTODY RECORD	10-Dav	]	in the set of the set	3-Day	4-Day	K EXCEI		I Required;	pro ( trun pros		site Grab Matrix Con	0	0	<u>о</u>	20	0	V L				Please use th	<del></del>	 H	ALT Special Requit	MCP Certification (	CT F	RCP Certification	MA State I	# GISMd	Municipality	21 J Brownfield
http://w	CHAIN OF	7-Day	Due Date:		1-Day	A 2-Day X	Format PDF	Other:	tron CLP Like Data Pkg		rdx 10 #.	e/Time Date/Time Compo	11/20 1105	1/20 1110	1/20 111 5	11/20 1120	1/20 1125	1/20 1145							Neo Gar Mark Requirence			CT K5K+			ject Entity  Government	Federal City
	: 413-525-2332	13-525-5405 info@contestlabs.com		1. W. A380-, C		Station Incel	New Hoven, CT		1711 English Sta			ple ID / Description Bet	00-01 (0-0.5) 2/	(0-02 (0-0.5') 2/	1/2 (.5.0-0) 20-0)-	(0-0+(0-0'2) <u>2/</u>	1-60-05 (0.05.) 2/1	0-00 21							Date/Time: DAID	DAte/Time:	Naua:01	DeterTime: H'20	Dáte/Time:	2/11/2020	Date/Time: Proj	Date/Time:
	KSt <sup>®</sup> Phone:	soy47 Email:	TRC	Fridtin RA N	7690-86	English	10/1 Gran & Ave	x1 Stoper	/Number: 820180	al Stopper	Marke Winny	Client Sam	1 TRE ADG 1-	- 1-JUK-JUC-1-	3 779(-/10(-1	-1-101-1-1-	5 TRI-140C-1	6 EB 02 112							lature)		Weel all	W Leve 21	re) 5.5	1000	lature)	re)
		KLM 206	Company (Tomes	Address: 2   G	Phone: 860 - 2		Project Location: 2	Project Manager: Co	Con-Test Quote Name,	Invoice Recipient: C		Con- 1 est Work Order#										Comments:			Belinquished by Sign	Received by: (signatur	1 thu alke	Herinquished by: (sig)	Acceived by Signatur		10 U slinquished by: (sign	6 signatur 6

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I Have Not Confirmed Sample Container Numbers With Lab Staff Before Relinquishing Over Samples



Doc# 277 Rev 5 2017 Login Sample Receipt Checklist - (Rejection Criteria Listing - Using Acceptance Policy) Any False Statement will be brought to the attention of the Client - State True or False Client TRC R 2-11-2020 **Received By** Date Time 1600 How were the samples  $\overline{\phantom{a}}$ No Ice No Cooler On Ice In Cooler T received? Melted Ice Ambient **Direct from Sampling** 2 Actual Temp - 5, 9 By Gun # Were samples within 1 By Blank # Actual Temp -Temperature? 2-6°C Were Samples Tampered with? NA Was Custody Seal Intact? NA Does Chain Agree With Samples? T Was COC Relinquished ? Are there broken/leaking/loose caps on any samples? ř Were samples received within holding time? Is COC in ink/ Legible? 1 Client Sampler Name Did COC include all Analysis i **Collection Dates/Times** pertinent Information? Project ID's Are Sample labels filled out and legible? Are there Lab to Filters? Who was notified? Who was notified? Mike. Are there Rushes? Are there Short Holds? Who was notified? Is there enough Volume? i MS/MSD? F Is there Headspace where applicable? NA Proper Media/Containers Used? 1 Is splitting samples required? F On COC? FWere trip blanks received? Base Acid Do all samples have the proper pH? NA # Containers: 4 Vels 1 1 Liter Plastic 16 oz Amb. Unp-1 Liter Amb. 8oz Amb/Clear HCL-500 mL Amb. 500 mL Plastic 250 mL Amb. 250 mL Plastic 4oz Amb/Clear Meoh-Col./Bacteria 2oz Amb/Clear Bisulfate-Flashpoint Other Glass Other Plastic Encore DI-Thiosulfate-SOC Kit Plastic Bag Frozen: Sulfuric-Perchlorate Ziplock **Unused Media** Vials Containers: 1 Liter Amb. 1 Liter Plastic 16 oz Amb. Unp-8oz Amb/Clear HCL-500 mL Amb. 500 mL Plastic 4oz Amb/Clear Meoh-250 mL Amb. 250 mL Plastic Col./Bacteria Flashpoint 2oz Amb/Clear **Bisulfate-**Other Plastic Encore DI-Other Glass SOC Kit Plastic Bag Frozen: Thiosulfate-Sulfuric-Perchlorate Ziplock Comments:

#### C:\MSDCHEM\4\DATA\D021120.SEC\D0211047.D

#### **CT ETPH DISCRIMINATION CHECK**

Data File Name D0211047.D Data File Path C:\MSDCHEM\4\DATA\D021120.SEC\ Operator RMW Date Acquired 2/12/1920 10:03 Acq. Method File EPH11D.M Sample Name ETPH 1500 Instrument Name GCFID4

	Name	Ret Time	Target Response	Average Response	*%D+/-20
C-9		1.61	9808924	11260126	13
C-10		2.26	10197996	11260126	9
C-12		3.19	10814645	11260126	4
C-14		3.91	11233027	11260126	0
C-16		4.52	11457031	11260126	-2
C-18		5.06	11629622	11260126	-3
C-20		5.66	11664964	11260126	-4
C-22		6.40	11674057	11260126	-4
C-24		7.23	11708381	11260126	-4
C-26		8.04	11635058	11260126	-3
C-28		8.78	11676673	11260126	-4
C-30		9.46	11624113	11260126	-3
C-32		10.09	11372631	11260126	-1
C-34		10.69	11333345	11260126	-1
C-36		11.26	11071429	11260126	2

#### \*One compound allowed %D</=50%

<u>Samples</u> 20B0447-06 20B0447-03@10X 20B0447-05@100X 20B0447-01@100X

2/12/2020 3:04 PM

Page 17 of 19

#### **CT ETPH DISCRIMINATION CHECK**

Data File Name	D0211046.D
Data File Path	C:\MSDCHEM\4\DATA\D021120\
Operator	RMW
Date Acquired	2/12/1920 9:46
Acq. Method File	EPH11D.M
Sample Name	ETPH 1500
Instrument Name	GCFID4

Name	Ret Time	Target Response	Average Response	*%D+/-20
C-9	1.52	7582835	8577058	12
C-10	2.21	7801368	8577058	9
C-12	3.17	8181615	8577058	5
C-14	3.89	8485142	8577058	1
C-16	4.51	8695534	8577058	-1
C-18	5.06	8942095	8577058	-4
C-20	5.67	8972665	8577058	-5
C-22	6.41	9010507	8577058	-5
C-24	7.25	9026647	8577058	-5
C-26	8.06	8940457	8577058	-4
C-28	8.81	8910281	8577058	-4
C-30	9.49	8783737	8577058	-2
C-32	10.13	8553735	8577058	0
C-34	10.73	8485816	8577058	1
C-36	11.31	8283433	8577058	3

<u>Samples</u>

20B0447-04@20X 20B0447-02@100X \*One compound allowed %D</=50%

Client: TRC Environmental Corporation - CT

20B0447

**Project Number:** 

Sample Date(s):

02/11/2020



### REASONABLE CONFIDENCE PROTOCOL LABORATORY ANALYSIS QA/QC CERTIFICATION FORM

Laboratory Name: Con-Test Analytical Laboratory

Project Location: 510A Grand Ave., New Haven, CT

Laboratory Sample ID(s):

20B0447-01 thru 20B0447-06

List RCP Methods Used:

CTDEP ETPH

1	For each analytical method referenced in this laboratory report package, were all specified QA/QC performance criteria followed, including the requirement to explain any criteria falling outside of acceptable guidelines, as specified in the CTDEP method-specific Reasonable Confidence Protocol documents?	Yes No
1A	Were the method specified preservation and holding time requirements met?	Yes No
1B	VPH and EPH Methods only: Was the VPH and EPH method conducted without significant modifications (see Section 11.3 of respective RCP methods)?	Yes No
2	Were all samples received by the laboratory in a condition consistent with that described on the associated chain-of-custody document(s)?	Yes No
3	Were samples received at an appropriate temperature (< 6 degrees C.)?	yes □ No □ N/A
4	Were all QA/QC performance criteria specified in the CTDEP Reasonable Confidence Protocol documents achieved?	Yes 🖌 No
5A	Were reporting limits specified or referenced on the chain-of-custody?	Yes 🖌 No
5B	Were these reporting limits met?	Yes No
6	For each analytical method referenced in this laboratory report package, were results reported for all constituents identified in the method-specific analyte lists presented in the Reasonable Confidence Protocol documents?	Yes No
7	Are project-specific matrix spikes and laboratory duplicates included in this data set?	Yes 🖌 No

Notes: For all questions to which the response was "No" (with the exception of question #7), additional information must be provided in an attached narrative. If the answer to question #1, #1A, or #1B is "No", the data package does not meet the requirements for "Reasonable Confidence."

Lisa A. Worthington

This form may not be altered and all questions must be answered.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete.

Authorized Signature:

hisa Worthungton

Position: Technical Representative

Printed Name: Lisa A. Worthington

Date: <u>02/13/20</u>

Name of Laboratory: <u>Con-Test Analytical Laboratory</u>

This certification form is to be used for RCP methods only.

# APPENDIX L

# Licenses and Permits for Disposal Facilities

2019



2019

## Construction and Demolition Debris Facility License

License Expires December 31, 2019

Facility:Minerva Enterprises LLCLicensee:CID: 542888955 Minerva Rd SEWaynesburg, OH 44688	Minerva Enterprises, LLC 8955 Minerva Rd., SE P.O. Box 709 Waynesburg, OH 44688
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This license has been issued in accordance with the requirements of state law, is subject to revocation or suspension for cause, and is not transferable without the consent of the approved Board of Health and the Director of the Ohio Environmental Protection Agency.

#### Licensing Authority: Stark County Combined General Health District

#### **Conditions of Licensure:**

The Licensee hereunder, its agents, employees, and all others in active concert with said licensee, including the facility owner and operator, shall be subject to and shall comply with the following conditions of the this license:

1. All applicable requirements of Ohio Revised Code Chapters 3714, 3734, 6111, and 3704 and the rules adopted thereunder.

2. Plans, other authorizing documents and administrative and judicial orders applicable to this facility and as approved by the Ohio Environmental Protection Agency and/or the approved Board of Health.

3. By applying for and accepting this license, the licensee specifically consents in advance and agrees to allow the Director, the Health District, or an authorized representative, to enter upon the licensee's premises at any reasonable time during the construction and/or operation of the facility for the purpose of inspecting, conducting tests, collecting samples, or examining records or reports pertaining to construction, modification, installation, or operation of the facility. The licensee hereby acknowledges and agrees that any and all rights of access granted herein shall not be deemed to be unreasonable or unlawful under Ohio Revised Code Sec. 3714.08.

The licensee, its agents, employees, and all others in active concert with said licensee shall maintain and operate the construction and demolition debris facility to which the license pertains in a sanitary manner so as not to create a nuisance, create a fire hazard, cause or contribute to water pollution, or create a health hazard. This license shall not be construed to constitute a defense to any civil or criminal action brought by the State of Ohio or any duly authorized representative thereof to enforce the provisions of Chapters 3714, 3734, 3767, 6111, or 3704 of the Ohio Revised Code, or the rules adopted thereunder.

Issuance of this license does not relieve the licensee of the duty to comply with all applicable federal, state, and local laws, regulations and ordinances.

If Checked, Additional Conditions Apply to This License (See Back, or Attachment)

kland X. Namis

**DECEMBER 27, 2018** 

**Health Commissioner** 

Date Issued

# Minerva Enterprises, LLC

### WASTE PROFILE FORM

Approval #:

In order for Minerva Enterprises to decide whether it can lawfully and safely accept your waste for delivery, it must obtain the following information about your waste. The form should be filled out completely by someone knowledgeable about the waste and hazardous waste rules. All related analysis must be included with this form, and if future analysis differs from what was submitted, the analytical results must be sent to Minerva immediately. If supplying Generator Knowledge do so at 6C. All information on this form must be typed or printed in black/blue ink.

#### 1. Generator Information

Generator Name/Owner					
Address					
Contact		Phone			
Fax		E-Mail			
2. Consultant Informa	ation				
Consultant Firm		License #			
<u></u>					
Address					
	Phone	Fax	 F-Mail		
3 Location of Waste	Generation (ship from)				
0. Loodion of Music			Burnt Structure?	Voc	No
			Buillt Structure?	165	NU
Name of Building (if any	)	Age of Structure	Industrial Complex?	Yes	No
Address (Street / City / S	State / Zip Code)				
4. Waste Information					
Common Name of Waste	e				
		Has this waste ever	been commingled?	Yes	No
Detailed Description of F	Process Generating Waste				
	receive concluding tracto				

# Minerva Enterprises, LLC

Is this a Hazardous Waste as defined by Federal, State or Local Laws or Regulations? Yes

Has this waste stream been rejected by another facility? Yes No

 A. With the exception of item (10) PCB BULK PRODUCT WASTE, does the disposal material from the project or transfer facility contain off-specification material; hazardous waste, solid wastes, or infectious wastes, regulated material or regulated concentrations of Polychlorinated Biphenyl's (PCB's); or low-level radioactive waste whose treatment, recycling, storage, or disposal is governed under division (B) of section 3748.10 of the Ohio Revised Code. As used in this section, "hazardous waste," "solid wastes," and "infectious wastes" have the same meanings as in section 3734.01 of the Ohio Revised Code. Yes No

Is this waste stream C&D Debris? Yes No

Is this waste stream treated wood (poles/ties)? Yes No

Is this material asbestos waste? Yes No If Yes: Friable Non-Friable Description:

No

Is this material PCB Bulk Product Waste? Yes

5. Physical Characteristics of Waste (All Components)

A. Color:

B. Odor: None Mild Strong Describe:

C. Physical State: Solid Semi-Solid (sludge) Liquid Other:

D. Percent Solids (if known):

E. Waste will be delivered to the site in: Bulk Fiber Drum Other:

F. Anticipated Volume: Tons Yards Drums

G. Frequency: One-time Weekly Monthly Other:

H. Size is the material 4ft minus all sides? Yes No

A. Laboratory Analysis Attached: Yes No How many pages?

B. Not Applicable:

6. Laboratory Information

Section 6 continued on next page (pg. 3):

Other:

No

# Minerva Enterprises, LLC

C. Generator Knowledge: Ye	es No								
GENERATOR Knowledge CERTIFICATIC I hereby certify that all information container classified, packaged, labeled, and preparer disclosed:	IN STATEMENT: ed herein is true and corre d as indicated. I certify that	ect, and the material described is properly identified, at all known and suspected hazards have been							
Print	Signature	Date							
7. Certification									
WHO IS RESPONSIBLE FOR PAYI	MENT FOR SERVICE	ES:							
Generator's behalf. I have made a completion of this form. This inves performed in on a representative s including the results of all laborato documents. I further hereby certify suspected hazardous constituents disclosed herein. Additionally, any Enterprises, will not be held liable non-conforming or off spec materia Name:	complete and thorou tigation included labo sample of the waste. ry analysis has been that such information (characteristics or safe waste that is non-co for expenses related al.	igh investigation of all matters relevant to ratory analysis where applicable, and where All required information concerning the waste, provided in this form and the attached is complete and accurate and that all known or ety hazards associated with the waste have been nforming will be returned to me, and that Minerva to any transportation, storage and handling of the							
(Print or Type)		(Signature)							
Title		Date							
8. Waste Acceptance (This section	n is for official use by I	Minerva Enterprises)							
The waste, as represented by information contained in this document is provisionally accepted for disposal									
at Minerva Enterprises (see Section	7 of this form).								
Signature of Authorized Minerva Repre	esentative:	Date:							
Does Responsible Party have Approve	d Credit?:	Account Number:							
9. Waste Rejection									
Yes No									

WASTE MANAGEMENT	Total 8 RCRA Metals (7060, 7740, etc.)	Total Volatiles (8260)	Total Semi-Volatiles (8270)	Total Pesticides (8081)	Total Herbicides (8151)	Total PCB's (8082)	Ignitability/Flash (1010-liquids,1030-soli	Corrosivity/pH (9045)	Reactive Sulfide (7.3.4.1)	Reactive Cyanide (7.3.4.2)	TCLP Hexavalent Chromium (1311)	TCLP Trivalent Chromium (1311)	Percent Total Sulfate	Total Petroleum Hydrocarbons (8100)	Free Liquids/Paint Filter (9095)	Asbestos (Polarized Light Microscopy)	TYPICAL ANALYTICAL REQUIREMENTS Waste Management of New Hampshire TLR-III Refuse Disposal Facility P.O. Box 7065/ 30 Rochester Neck Road Rochester, New Hampshire 03839-7065 Technical Service Center (TSC): 800/963-4776 TSC Fax: 603/330-2198
Ash																	Sampling Frequency and/or Special Requirements
Fossil Fuel Boiler Ashes	×							×					×				Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Wood/Biomass Boiler Ash	×							×					×				Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Open Burn Ashes	×							×					×				Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
MSW Incinerator Ash	×							×					×				Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Infectious Waste Incinerator Ash	×							×					×				Frequency- 1 sample per 250 tons or annually if ongoing. Generator must provide dust control as necessary.
Contaminated Soil and Debris		-1		0													
Gasoline Contaminated Soil and Debris	Pb	X					×							×			Waste must not be saturated. No free product.
Used Oil Contaminated Soil and Debris	×	×	×			×	×	× :	×	×				×			Waste must not be saturated. No free oil. WM cannot accept state regulated waste including NH01 or MA01.
Virgin Petroleum Contaminated Soil and Debris	×	×					×							×			Virgin spill report, site history & certification that virgin petroleum is the sole impact to the waste.
Urban Fill Type Contaminated Soil and Debris	×	X	×	×	×	×	X	×	×	×							Frequency- 1 sample per 250 tons up to 1000 tons. If >1000 tons, one sample per 500 with a minimum of four.
Sludge																	
Alum Sludge	×							×							×		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Car Wash Sludge	×	X						×						×	×		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Latex Sludge	×	X													×		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Laundry Sludge	×	X				×		×						×	×		No free liquids for direct disposal. Solidification may be approved in advance for wastes containing free liquids.
Leather Sludge	×	X						×			×	×			×		Acceptability per Env-Wm 401.03(b)(5) and 40 CFR 261.4(b)(6)(i).
POTW Sludge	×	×	×										×		×		No free liquids for direct disposal. Generator must provide odor control as necessary.
Grit																	
POTW Grit/Screenings															×		No free liquids for direct disposal. Generator must provide odor control as necessary.
Sandblast Grit	×					×											Other parameters may be applicable depending on coating and surface blasted.
Catch Basin Grit / Sewer Grit	×	×				×							Χ	×	×		Other parameters may be applicable depending on potential discharges to the catch basin/sewer pipe.
Miscellaneous																	
Auto Fluff / Auto Shredder Residue	×	X	×			×											Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Coal Tar / MGP Derived Wastes	×	X	×			X		:	×	×							Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Landfill Leachate	×	×	X	×	×	×	×	×	×	×			×			×	Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Leather Scraps	×								Ï		×	×					Acceptability per Env-Wm 401.03(b)(5) and 40 CFR 261.4(b)(6)(i). TCLP Hexavalent Chromium <1 mg/L.
Oily Solids / Oily Rags	×	×	X			×	×		Ï					×			Must not be a state regulated waste. No free liquids.
Street Sweepings	×	×				×			Ī	T	T						Must be non-hazardous in accordance with 40 CFR 261 and Env-Wm 400
Wood Chips / C&D Fines	×		×						Ī				×			×	For consideration for use as cover, must also include particle size & organic content
Other Non-Hazardous Special Wastes	×	×	×	×	×	×	×	×	×	×			×				Parameters determined based on generator knowledge of the process generating the waste, site history, etc.

NOTE: IF THE TOTAL CONCENTRATION OF ANY TCLP-REGULATED CONTAMINANT (40 CFR 261.24) IS GREATER THAN OR EQUAL TO TWENTY TIMES ITS REGULATORY THRESHOLD, TCLP ANALYSIS IS REQUIRED.

### State of New Hampshire DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095 603-271-3503 FAX 603-271-2867 TDD Access: Relay NH 1-800-735-2964



April 10, 1995

Steven J. Poggi, P.E. Turnkey Recycling & Environmental Enterprises P.O. Box 7066 97 Rochester Neck Road Gonic, New Hampshire 03839

# Subject: Standard Permit No. DES-SW-SP-95-001/TLR-III Refuse Disposal Facility/97 Rochester Neck Road, Rochester

Dear Mr. Poggi:

Enclosed herewith is Standard Permit No. DES-SW-SP-95-001, which authorizes the landfilling of solid waste at the above noted location. This permit has been issued by the New Hampshire Department of Environmental Services, Waste Management Division (Department) pursuant to the provisions of RSA 149-M:10 and Part Env-Wm 314 of the New Hampshire Solid Waste Rules (Rules).

Please maintain a copy of this permit with your facility file records for future reference and conspicuously post a copy of the permit at the facility.

Questions regarding the issuance of this permit may be directed to Michael E. Guilfory, P.E. at (603) 271-2935. Questions regarding operational compliance may be directed to the district inspector for your region of the state, who may be contacted in the Department's Solid Waste Compliance Section at 271-2925.

Sincerely,

--- P

Philip J. O'Brien, Ph.D., Director Waste Management Division

Enclosures

Permit No. DES-SW-SP-95-001 Commencement of Construction Notice Form Commencement of Operations Notice Form DES Permit Process Questionnaire

cc w/encl.

WMEB-PA&DRS WMCB-SWCS WSPCD-GPB PIP City Of Rochester

City Of Rochester SW District Sanborn, Head and Associates

AIR RESOURCES DIV. 64 No. Main Street Caller Box 2033 Concord, N.H. 03302-2033 Tel. 603-271-1370 Fax 603-271-1381 WASTE MANAGEMENT DIV. 6 Hazen Drive Concord, N.H. 03301 Tel. 603-271-2900 Fax 603-271-2456 WATER RESOURCES DIV. 64 No. Main Street P.O. Box 2008 Concord, N.H. 03302-2008 Tel. 603-271-3406 Fax 603-271-1381 WATER SUPPLY & POLLUTION CONTROL DIV. P.O. Box 95 Concord, N.H. 03302-0095 Tel. 603-271-3503 Fax 603-271-2181 1552



## SOLID WASTE MANAGEMENT FACILITY STANDARD PERMIT

as authorized by the

NH Department of Environmental Services, Waste Management Division (Department) pursuant to RSA 149-M and part Env-Wm 314 of the <u>New Hampshire Solid Waste Rules</u>

#### I. <u>PERMIT/.FACILITY IDENTIFICATION:</u>

Permit No: DES-SW-SP-95-001

Facility Type: Lined Landfill

Service Type: Commercial

Facility Name: TLR-III Refuse Disposal Facility

Facility Location: 97 Rochester Neck Road, Rochester, NH; Tax Map 267, Lot 2; SCRD Plan Drawer 41, Plan 99, 100, 101.

Permittee: Waste Management of New Hampshire, Inc.

**Facility Description:** This facility is a double lined landfill for the disposal of solid waste. It covers an area of approximately 100 acres to provide an estimated capacity to receive 19 million cubic yards of waste including cover materials, or approximately 10 million tons based on current landfilling practices. The facility will develop in 8 phases, the first six to be over virgin ground and the last two to be constructed over the permittee's closed landfill called TLR-I. The facility has a minimum 15 year life expectancy. The facility has an associated wood chipping operation for the production of waste-to-energy fuel for use by permitted facilities and/or bulking agent for use at permitted composting facilities.

- II. <u>TERMS AND CONDITIONS</u>: The permittee shall comply with the requirements of RSA 149-M, the <u>New Hampshire Solid Waste Rules</u> (<u>Rules</u>) and the attached terms and conditions, as amended.
- III. <u>AUTHORIZATION</u>: Pursuant to RSA Chapter 149-M:10 and Parts Env-Wm 304 and 314 of the <u>Rules</u>, this permit is hereby issued to the permittee as identified in Section I above to construct and operate the solid waste management facility identified in Section I above, pursuant to the requirements of Section II above. BY EXERCISING ANY RIGHTS UNDER THIS PERMIT, THE PERMITTEE HAS AGREED TO ALL TERMS AND CONDITIONS OF THE PERMIT, AS ATTACHED HEREWITH. Failure to comply with these terms and conditions could result in civil or criminal penalties, suspension or revocation of the permit. No liability is incurred by the State of New Hampshire by reason of any approval of this solid waste facility. Approval by the Department is based on plans and specifications supplied by the applicant. No warranty/ guarantee is intended or implied by reason of any advice given by the Department or its staff.

Philip J. O'Brien, Ph.D., Director Waste Management Division

April 10, 1995 Date

1553

Permit No. DES-SW-SP-95-001 / Terms & Conditions Waste Management of New Hampshire, Inc. TLR-III Refuse Disposal Facility Turnkey Recycling & Environmental Enterprises 97 Rochester Neck Road Rochester, New Hampshire 03839 April 10, 1995 Page 1 of 24



#### Section I: General Conditions

(1) <u>Effective Date:</u> This permit shall be effective when all requisite federal, state or local permits, licenses or approvals are obtained and maintained by the permittee.

(2) <u>Basis of Approval / Supporting Documentation</u>: This facility is permitted on the basis of information provided by the permittee in the below listed permit application documents, hereinafter collectively referred to as the Permit Application:

(a) Standard Permit Application documents prepared by GZA GEOENVIRONMENTAL, INC. on behalf of Waste Management of New Hampshire, Inc. / Turnkey Recycling and Environmental Enterprises (WMNH) (ref: WMD Log# 043-93; received 04/30/93);

(b) Supplemental permit application information prepared by Sanborn, Head and Associates and WMNH (ref: WMD Log# 065-93; received 06/22/93);

(c) Supplemental permit application information prepared by WMNH (ref: WMD Log# 101-93; received 07/23/93);

(d) Supplemental permit application information prepared by WMNH and Sanborn, Head & Associates (ref: WMD Log# 199400225; received 03/23/94);

(e) Seismic Assessment for TLR-III Refuse Disposal Facility prepared by GEOCOMP Corporation (ref: WMD Log# 199400191; received 05/16/94);

(f) Supplemental permit application information prepared by WMNH (ref: WMD Log# 199400214; received 06/16/94);

(g) MULTIMED liner equivalency analysis prepared by Sanborn, Head & Associates (ref: WMD Log# 199400213; received 06/21/94).

(h) Permit application amendment to address operating provisions for the wood processing function of this facility, as prepared by WMNH (ref: WMD Log# 19950007; received 12/27/94).

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(I) Permit application amendment specifying in Section 7.4.1 of the facility's Operating Plan certain provisions for the acceptance of "special wastes", as prepared by WMNH (ref: WMD Log # 199500155; received 03/08/95).

(3) <u>Citations and Definitions</u>: This permit has been prepared on the basis of the <u>New</u> <u>Hampshire Solid Waste Rules</u>, <u>Env-Wm 100-300 & 2100-2800</u>, <u>(Rules</u>) as adopted on July 1, 1991 and amended on December 24, 1991. Accordingly, the meaning of specific terms in this permit are intended to conform to definitions set forth in parts Env-Wm 102 and 103 of the <u>Rules</u>.

(4) <u>Regulatory Requirements</u>: This facility shall comply with the requirements of RSA 149-M, the <u>Rules</u>, as may be amended from time to time, and the terms and conditions of this permit. Further, the development and operation of this facility is expected to conform to the proposal submitted in the Permit Application. Where conflicts may exist between the proposal presented in the Permit Application and the terms and conditions of this permit, the terms and conditions of this permit, the terms and conditions of this permit shall apply, subject, if necessary, to any clarification provided by the Department.

(5) <u>Reservations and Limitations</u>: Issuance of this permit is based on information provided by the permittee to the Department in the Permit Application. If any of the information is incomplete, false, misleading or inaccurate, the Department may suspend or revoke this permit pursuant to RSA 149-M:11, assess civil or criminal penalties, or modify the permit pursuant to Env-Wm 306.08.

(6) <u>Determination of Public Benefit</u>: Based on the projected 20 year solid waste disposal capacity needs for the State of New Hampshire on the date of permit issuance and based on the continuing resource recovery functions outlined in section 11.2.2 of the Permit Application, it is the determination of the Department under RSA 149-M:10-c, X that this facility can provide a substantial public benefit, as required by RSA 149-M:10-c, III and XI, if facility operations conform to the following conditions:

(a) As represented by the permittee in the Permit Application, the permittee shall operate this facility in a manner that provides 15 or more years of disposal capacity for New Hampshire solid waste generators. Although facility capacity may be depleted at a variable rate over the life of the facility, the permittee shall control the capacity depletion rate so as to fulfill the 15 year requirement in good faith, which shall preclude operating the facility at token capacity levels in order to achieve 15 years of life.

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(b) The permittee shall operate this facility in a manner that is consistent with the requirements of RSA 149-M:22 and in a manner that otherwise assists the State in achieving the hierarchy of waste management methods and goals specified in RSA 149-M:1-a

(c) The permittee is required in its Annual Report (ref. Env-Wm 311.07(d)) to provide a capacity availability analysis which identifies the remaining facility life span based on current and historic rates of use.

(d) If the total projected facility life is less than 15 years, the permittee shall identify measures to be taken to adjust facility operations to provide at least 15 years of total facility life or, alternatively, the permittee shall demonstrate why adjustment is unnecessary to continue to provide the benefit to New Hampshire generators identified in paragraph (a).

(e) The permittee shall provide in its Annual Report, as required by Env-Wm 311.07(d)(3)-(4), information to clearly demonstrate:

(1) how facility operations have assisted and will continue to assist the State in achieving the hierarchy of waste management methods and goals specified in RSA 149-M:1-a; and

(2) how facility operations have complied with the requirements of RSA 149-M:22.

(f) If the Department is not satisfied that the information provided by the permittee per paragraphs (d) and (e) above meets the requirements of RSA 149-M:10-a, XI, the Department may, in accordance with Env-Wm 306.05, take one or more of the following actions:

(1) set a maximum disposal rate for the facility, subject to annual readjustment based on remaining facility capacity and actual State wide capacity need projections;

(2) stipulate the earliest date(s) that the permittee may construct a subsequent phase; and/or

(3) stipulate other appropriate controls for assuring that the facility

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continues to provide a substantial public benefit.

(7) <u>RCRA Subtitle D Considerations</u>: The State of New Hampshire received a Final Adequacy Determination of the State/Tribal Municipal Solid Waste Program from the United States Environmental Protection Agency (USEPA) on February 14, 1995. As such, the Director of the Department's Waste Management Division is the State Director and so is currently the "Director of an Approved State" as provided for in 40 CFR Part 258. In accordance with that status, the Director is, therefore, certifying the following provisions of 40 CFR Part 258 relevant to this permit:

(a) Based on information submitted by the permittee in the Permit Application and relevant certifications related thereto by the permittee's consulting engineers that evaluated the proposed facility design for seismic impact, the permittee has demonstrated to the Director that all containment structures, including liners, leachate collection systems, and surface water control systems are designed to resist the maximum horizontal acceleration in lithified earth material for the site in accordance with 40 CFR 258.14, Seismic Impact Zones. Therefore, this facility is hereby authorized to be sited as proposed within this federally designated seismic impact zone.

(b) The Director is approving the design of the facility in accordance with 40 CFR Part 258.40(a)(1), (c) and (d). The relevant point of compliance for this provision, as specified by the Director, is no more than 150 meters from the waste management unit boundary and is on land owned by the owner of the facility.

(8) <u>Responsibility</u>: The permittee, operator and property owner, whether the same or different, shall individually and collectively ensure compliance with the terms of this permit, the <u>Rules</u> and all other applicable laws, regulations and ordinances, as amended.
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#### Section II: Scope of Permitted Activities

(1) <u>Facility Type</u>: This facility is permitted to be a solid waste landfill, as defined by Env-Wm 103.09, and is permitted to also include a waste wood chipping operation for the production of waste-to-energy fuel for use by permitted facilities and/or a bulking agent for use at permitted composting facilities.

(2) <u>Anticipated Development</u>: This facility is permitted on the basis of plans to develop the landfill in eight sequential phases. Phases 1-6 are to be located over virgin ground, whereas Phases 7-8 are proposed to be located adjacent to and above the permittee's existing landfill known as Turnkey Landfill of Rochester - I, (TLR-I). Development of Phases 7 and 8 is dependent on the Department's future review of information to be provided by the permittee pursuant to Section IV /Conditions 3-6 of this permit and on the Department's determination that such information meets all applicable requirements existing at the time of the review .

(3) <u>Service Type and Area</u>: This facility is a commercial facility, as defined by Env-Wm 102.33, and shall thereby provide capacity for New Hampshire generators pursuant to the requirements of Section I / Condition (6) of this permit.

(4) <u>Facility Capacity</u>: The physical capacity of this facility shall be as shown on plan sheet no. 26 of 53 (entitled "Final Grading Plan") in the Permit Application, which provides for the following anticipated usage measurements:

(a) The in-place volume of wastes, including cover materials, to be received at the facility is estimated to be 19,000,000 cubic yards which, based on current landfilling practices, is estimated to equate with 10,000,000 tons. The actual tonnage may be different, depending on such factors as actual waste composition, compaction effort and daily cover practices.

(b) The facility life expectancy is 15 years minimum, subject to the requirements of Section I/Condition (6).

(c) The expected tonnage to be received at the facility on a weekly basis is 12,100 tons per week, on average annually, subject to the requirements of Section I/Condition (6).

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(5) <u>Authorized Wastes for Landfilling</u>: This facility is authorized to landfill solid waste only, subject to the following restrictions:

(a) the waste is not a waste prohibited by Condition (9) of this Section;

(b) the waste is landfilled in accordance with the requirements of Section I/Condition (6)(b); and

(c) the waste is landfilled in accordance with the applicable inspection and management provisions specified in Condition (6) below.

(6) <u>Inspection and Management Provisions by Authorized Solid Waste Type</u>: The following solid waste types shall only be landfilled at this facility under the below described terms for inspection and management:

(a) municipal solid waste, as defined in Env-Wm 103.23, subject to regular inspections to assure the exclusion of any prohibited waste as specified in Condition (9) below and to assure that any waste identified in paragraphs (c) -(i) below is properly separated and independently managed as required by paragraphs (c) - (i) below.

(b) construction and demolition debris, as defined in Env-Wm 102.38, subject to regular inspections to assure the exclusion of any prohibited waste as specified in Condition (9) below and to assure that any waste identified in paragraphs (d)-(i) below is properly separated and independently managed as required by paragraphs (d)-(i) below.

(c) bulky wastes, as defined in Env-Wm 102.23, subject to regular inspections to assure the exclusion of any prohibited waste as specified in Condition (9) below and to assure that any waste identified in paragraphs (d)-(i) below is properly separated and independently managed as required by paragraphs (d)-(i) below, and subject to the provisions of Env-Wm 2600, as applicable.

(d) bottom ash, as defined in Env-Wm 102.22 and fly ash, as defined in Env-Wm 102.61 resulting from the incineration of:

(1) municipal solid waste, subject to the provisions of Env-Wm 2602 or, alternatively, the provisions of any waiver to Env-Wm 2602 which may be

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granted by the Department pursuant to Env-Wm 202 and Section VI/Condition (3) of this permit;

(2) medical/infectious waste, subject to the provisions of Env-Wm 2602; and/or

(3) biomass, subject to the provisions of Env-Wm 2602 and for which alternative management by agricultural landspreading is not available or appropriate for identified reasons, including ash quality, odors, weather conditions, or land use restrictions.

(e) asbestos waste, as defined by Env-Wm 102.15, subject to the provisions of Env-Wm 2601;

(f) treated infectious waste which has been autoclaved, or otherwise treated and disinfected in accordance with and so as to meet the standards for landfilling in Env-Wm 2604;

(g) virgin petroleum contaminated soils, subject to the provisions of the Department's "Interim Policy for the Management of Soils Contaminated from Spills/Releases of Virgin Petroleum Products", as amended.

(h) other non-hazardous solid waste as listed below, if determined to be nonhazardous based on generator knowledge/certification and/or representative sampling and analysis in accordance with all applicable federal and state regulations and in accordance with the provisions of Section 7.4.1 (Special Waste Program) of the facility's Operating Plan as provided in the Permit Application inclusive of the revisions dated March 8, 1995, and also subject to the recordkeeping requirements of Section VII/condition (5) of this permit. However, the permittee shall not exclusively rely on generator knowledge to determine that a waste is not hazardous unless the generator's knowledge is in fact substantial and preponderant to making such determination, for example when the generator is able to demonstrate that the waste results from a process not involving any hazardous materials or waste.

(1) sludge and septage solids for which alternative management options, such as composting, landspreading and/or incineration are not available or

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appropriate for identified reasons;

(2) waste from industrial processes;

(3) waste from pollution control devices;

(4) residue from a spill of a non-hazardous chemical substance or commercial product or a waste listed above;

(5) contaminated residuals from the clean-up of a facility generating, storing, treating, recycling, or disposing wastes, chemical substances or commercial products listed above;

(6) commercial products which are off-specification, outdated, or unused;

(7) waste produced from the demolition or dismantling of industrial process equipment or facilities contaminated from the industrial process;

(8) contaminated soils and other media, other than virgin petroleum contaminated soil that shall instead be managed in accordance with the provisions of paragraph (g) herein; and

(9) other non-hazardous waste not specifically listed above that has the potential to be hazardous so as to require completion of a hazardous waste determination prior to acceptance, or that requires special handling so as to require the additional measures specified in Section 7.4.1 of the facility's Operating Plan as cited above prior to acceptance. Examples include non-hazardous coal tar materials, off-specification compost, spent sandblasting grit, fluorescent light bulbs, fine particulate (airborne) wastes and any waste that is not identifiable prior to analytical characterization.

(i) other non-hazardous, non-recyclable solid waste not specifically listed above, subject to written approval from the Department based on information provided by the permittee that identifies the source, type, quantity, age if known, physical characteristics and analytical characteristics of the waste.

(8) <u>Authorized Waste for Processing</u>: This facility is further authorized to receive for processing and off-site disposal at a permitted facility wood waste such as yard waste,

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discarded pallets, lumber, utility poles, railroad ties and the like, that shall be temporarily stored at the facility outside of the liner system in a manner that is fire safe and will not otherwise contravene the Universal Environmental Performance Standards in Env-Wm 308 or interfere with the proper operation or closure of the landfill, and that is managed in accordance with the procedures given in Appendix 7H of the facility's Operating Plan.

(9) <u>Prohibited Wastes</u>: This facility shall not landfill any of the following wastes:

(a) hazardous waste, including small quantity generator waste, as each is defined by federal law and the <u>New Hampshire Hazardous Waste Rules</u>, as amended;

(b) polychlorinated biphenyls (PCBs) that are regulated under the Toxic Substances Control Act, as amended (ref. 40 CFR Part 761);

(c) CFCs, as prohibited by Title 6 of the Clean Air Act, as amended (ref. 40 CFR Part 82);

(d) wastes that are prohibited under RSA 149-M:22, or any other State or federal regulation. However, the facility may accept leaf and yard waste in accordance with the provisions of Condition (8) of this Section;

(e) untreated medical or infectious wastes;

(f) contained or free liquid wastes, except for leachate if approved by the Department pursuant to the provisions of Section VI/Condition (4);

(g) contained gaseous wastes; and

(h) source, special nuclear or by-product material as defined by the Atomic Energy Act of 1954, as amended.

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#### Section III: Design Requirements

(1) The final design of this facility shall conform to that which is presented in the Permit Application, as well as to the requirements of Env-Wm 309 and Env-Wm 2505.

(2) In addition to the above, the final design shall include provisions to address all requirements of this permit.

(3) Facility operations are contemplated to occur over no less than a fifteen year period on a phase by phase basis. During that fifteen year period, landfill construction and operation technologies and practices are expected to experience advancement/improvement. Therefore, as required by the <u>Rules</u> in Env-Wm 309.05(a), the permittee shall incorporate design enhancements each time a new phase is constructed or at other appropriate times, for example when the facility is capped, so as to employ best available technologies to the extent practicable.

(4) The final design plans shall show the locations where the soils with less than  $1 \times 10^{-4}$  c<sup>m</sup>/<sub>sec</sub> are to be placed in order to conform with Env-Wm 2505.03 (b).

(5) The final design plans shall show high water alarms with elevations for all pumps and tanks.

(6) Subject to the provisions of Env-Wm 306.05, or subject to any Rule amendments that may be authorized to require municipal solid waste landfills in New Hampshire to employ bioreactor technology for the rapid biological stabilization of landfilled wastes, the Department hereby reserves the right to require any of Phases 3-8 to be designed and constructed to include placement of a composite liner and leachate collection system that either meets the requirements of 40 CFR Part 258.40(a)(2) or meets an equivalent standard that the Director may have authority to and does approve, so as to allow leachate recirculation to occur in accordance with Env-Wm 2506.05(b)(4). See also Section VII/Condition (10) of this permit.

(7) The final design of the liner and leachate collection systems in Phases 7 and 8 shall be determined on the basis of information to be provided by the permittee pursuant to Section IV/Conditions (3)-(6) of this permit. In the Permit Application, the proposed design is to rely on the capping system at the TLR-I Landfill to serve as the secondary

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liner system for Phases 7 and 8, with potential tertiary containment to be provided by the TLR-I liner system. Since the future condition of the TLR-I liner and capping systems can not be ascertained at this time, nothing in this permit shall be misconstrued to mean that the Department has approved the proposed design. Instead, the Department has agreed, per the criteria established in Section IV/Conditions (3)-(6), to allow the proposed design concept to be justified for future approval at the time the actual construction is scheduled to occur in either Phases 7 or 8. Permit No. DES-SW-SP-95-001 / Terms & Conditions Waste Management of New Hampshire, Inc. TLR-III Refuse Disposal Facility Turnkey Recycling & Environmental Enterprises 97 Rochester Neck Road Rochester, New Hampshire 03839 April 10, 1995 Page 12 of 24



#### Section IV: Pre-Construction Requirements

(1) The permittee shall apply for and obtain written construction approval from the Department before commencing construction of any new phase of the facility; before modifying the approved construction plans for any existing phase of the facility except as provided by Env-Wm 310.09; and before commencing construction of any closure system component for any phase of the facility. Application for construction approval shall include the information listed below which for Phases 3-8 shall be submitted to the Department in triplicate no less than 90 days prior to the anticipated date of commencing construction of the applicable facility phase or phase component and for Phases 1-2 shall be submitted to the Department 10 working days prior to the anticipated date of commencing construction:

(a) complete final design plans, specifications and supporting documentation, prepared in accordance with Section III of this permit;

(b) the anticipated date that construction will commence;

(c) a closure cost estimate, to be supported by a preliminary closure plan that shows the final grades and typical capping details for fully closing the facility when the phase that is proposed for construction has reached capacity, as though no subsequent phases will be constructed. The cost estimate shall be itemized and the unit costs shall be representative of current market rates for the closure work to be performed by a third party, as per the requirements of Env-Wm 313. The cost estimate shall provide the basis for determining the amount of financial assurance required to satisfy Section VI/Condition (2)(f). Therefore, the financial assurance plan that will be companion to the closure cost estimate should be submitted to the Department in draft form after the closure cost estimate has been accepted and construction approval has been granted, in order that the Department may have adequate time to review the financial assurance plan prior to the time the permittee must satisfy the requirements of Section VI/Condition (2)(f).

(d) for Phases 3-8, a performance review of facility operations to date, to demonstrate to the satisfaction of the Department that construction and operation of the applicable facility phase or components will be compatible with existing

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site/facility conditions and will not adversely effect relevant environmental quality, health or safety matters;

(e) for new construction in Phases 7 and 8, the information required by conditions (3)-(6) of this section of the permit; and

(f) other information if required by the Department for good cause to support the application for construction approval.

(2) Before initiating any approved construction activities, the permittee shall comply with the construction notification requirements of Env-Wm 310.03 by filing with the Department, in duplicate, all information required by Env-Wm 310.03 on a form provided by the Department entitled "NOTICE OF INTENT TO CONSTRUCT".

(3) Application to construct and later to commence operations in those portions of Phases 7 and 8 that overlay the TLR-I landfill shall be submitted as a Facility-Scale Research and Development project proposal per Env-Wm 319.04. The research and development project proposal shall be submitted with the construction plans and shall identify the process by which the area will be developed and the means to monitor the performance and integrity of the cap/liner system. Such measures shall include:

(a) monitoring the actual settlement of the liner system over TLR-I;

(b) calculating and/or monitoring the actual strain in the liner system; and

(c) comparing actual settlement against the predicted values as proposed in the Permit Application.

(4) Prior to obtaining construction approval for either Phases 7 or 8, the permittee shall provide necessary documentation to support and shall accordingly certify that there is no fugitive contamination present (groundwater or gas leaks) resultant to TLR-I. If such contamination is present then the permittee shall demonstrate that such contamination is clearly decreasing in concentration due to control measures or circumstances that will be unaffected by the proposed construction or operation of the facility. This demonstration shall, in part, be made through the sampling of groundwater and/or gas monitoring wells, in addition to showing that the reasons for the releases have been fully investigated and that corrective action has been implemented to the satisfaction of the Department.

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(5) Prior to obtaining construction approval for either Phases 7 and 8, the permittee shall submit the results of a quality assurance/quality control (QA/QC) program for testing and determining the integrity and permeability of the existing clay cap over TLR-I which is proposed in the Permit Application to serve as the secondary liner for portions of Phases 7 and 8. As a condition of any construction approval that may be granted for either Phases 7 or 8, the permittee shall demonstrate to the satisfaction of the Department that the existing clay cap has an average thickness of 24 inches with a maximum hydraulic conductivity of  $1 \times 10^{-7}$  cm/<sub>sec</sub> throughout, and that all cracks or other flaws shall be repaired to the same minimum standard. The permittee shall also submit the plans and specifications detailing all potential or necessary repair work.

(6) Prior to construction of Phases 7 and 8, the approved post closure monitoring/maintenance plan for the TLR-I Landfill shall be modified as necessary to accommodate the physical changes brought about by the building of TLR-III. In addition, the TLR-I post closure monitoring period shall be modified to coincide with that of TLR-III. The permittee shall submit the proposed modified post closure monitoring/maintenance plan, in triplicate, for Department review no less than 90 days prior to the anticipated date for constructing in either Phases 7 or 8.

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#### SECTION V: Construction Requirements

(1) Construction of this facility shall not commence prior to fulfilling the requirements of Section IV of this permit.

(2) Construction of this facility shall require prior written approval by the Department, per Env-Wm 310.03. Written approval to construct shall be based on the information filed by the permittee in accordance with the provisions of Section IV of this permit.

(3) Construction practices at this facility shall comply with Env-Wm 310.

(4) Construction shall conform to the approved final design plans.

(5) Construction shall comply with the terms and conditions of any written approval granted by the Department for commencement of construction.

(6) No later than 90 days following completion of construction, the applicable record drawings shall be supplied to the Department, in duplicate, in accordance with the requirements of Env-Wm 310.14.

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#### SECTION VI: Pre-Operation Requirements

(1) Prior to commencing operations in any phase of the facility, the permittee shall obtain written approval to operate the phase by filing all of the information required by Condition (2) of this section at least 15 business days prior to the anticipated date of commencing operations in the new phase. The permittee shall provide such information in duplicate to the Department on and with a form provided by the Department entitled "NOTICE OF INTENT TO OPERATE".

(2) The NOTICE OF INTENT TO OPERATE shall include all of the following information as required by Env-Wm 311.04 and as otherwise required to satisfy any conditions of this permit that are prerequisite to operating this facility:

- (a) facility identification, including permit number;
- (b) date of intended commencement of operations;
- (c) a statement signed by the project engineer that to the best of his/her knowledge, the facility has been constructed in accordance with the permit, the <u>Rules</u>, and all approved plans and specifications and is fit for operation in accordance therewith;
- (d) the name, telephone number, certificate number and certification level of the certified operator(s);
- (e) the name and telephone number of the facility manager or other primary contact person; and
- (f) proof of financial assurance for the cost of closing the facility, as required by Section IX of this permit, which shall be in the form of finalized financial assurance documents that conform to a draft financial assurance plan and closure cost estimate that has received prior approval by the Department as provided by Section IV/Condition (1)(c).

(3) Prior to operating in Phase 3 of this facility, if the permittee elects to continue codisposing of municipal solid waste incinerator ash, the permittee shall apply for a waiver Permit No. DES-SW-SP-95-001 / Terms & Conditions Waste Management of New Hampshire, Inc. TLR-III Refuse Disposal Facility Turnkey Recycling & Environmental Enterprises 97 Rochester Neck Road Rochester, New Hampshire 03839 April 10, 1995 Page 17 of 24



to the requirements of Env-Wm 2602.04, in accordance with the provisions of Env-Wm 202. The application for waiver shall include, as supporting documentation, a final report on the permittee's approved pilot demonstration project for ash co-disposal. The application shall be submitted to the Department in quadruplicate at least 60 days prior to the date the permittee requires approval. See also Section VII/Condition (8) of this permit.

(4) If, per Section III/Condition (6), leachate recirculation will be practiced at this facility, the permittee shall submit for Department approval proposed amendments to the facility's approved Operating Plan that satisfy the requirements of Env-Wm 2506.05(b)(4) for recirculating leachate to promote the rapid biological stabilization of landfilled wastes. The proposed amendments, if approved by the Department, shall thereby become conditions for facility operations.

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#### **SECTION VII: Operating Requirements**

(1) This facility shall operate in compliance with the following requirements, as in effect on the issue date of this permit and as may be amended subsequent to the issue date of this permit:

- (a) 40 CFR Part 258, as provided in the Department's "Guidance Document for the State Permitting of Municipal Solid Waste Landfills Regulated under Federal Rules (40 CFR 258) in New Hampshire";
- (b) RSA 149-M;
- (c) the <u>New Hampshire Solid Waste Rules</u>, (ref. Env-Wm 100-300 & 2100-2800), specifically including Env-Wm 308, 311, 2506 and 2600;
- (d) all terms and conditions of this permit;
- (e) the Operating Plan found in Section 7 of the Permit Application, except as amended by the terms and conditions of this permit;
- (f) the provisions of any other present or future requisite federal, state or local permits, licenses or approvals that may be required for the operation of this facility; and
- (g) the terms of any authorization to operate granted by the Department pursuant to Section VI/Condition (1) of this permit.

(2) <u>Operating Capacity</u>: The operating capacity of this facility shall be as specified in Section II/Condition (4) and in accordance with Section I/Condition (6) of this permit.

(3) <u>Operating Information</u>: The permittee shall provide to the Department such information as the Department may from time to time request concerning the status of facility operations.

(4) <u>Operator Qualifications</u>: In accordance with the provisions of RSA 149-M:11, II, the Department may revoke or suspend this permit if any of the conditions set forth in RSA

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149-M:10, V-a applies to any facility operator.

(5) <u>Monitoring and Reporting</u>: In order to assure that the facility properly operates, certain data must be routinely collected, recorded and evaluated by the permittee. Therefore, the permittee shall collect all data that is necessary to assure that the facility is properly operating and that problems, should they arise, are expeditiously identified and corrected. The permittee shall maintain on file at the facility all required monitoring data, copies of which shall be made available to the Department if requested. As a minimum, the following monitoring and reporting requirements shall apply to the operation of this facility, until such time as the Department may notify the permittee of necessary changes, as determined by the Department on the basis of actual facility performance and/or changes in the Department's data base management needs.

(a) The liquid level of the 500,000 gallon leachate storage tank is to be monitored by the permittee on a weekly basis and reported to the Department quarterly.

(b) Groundwater monitoring and reporting shall occur in accordance with the facility's leak detection permit, issued through the Department's Water Supply and Pollution Control Division pursuant to the provisions of RSA 485-A.

(c) Methane gas concentrations shall be measured monthly at all required monitoring points and reported to the Department quarterly, in a table format, in addition to being reported as required by Env-Wm 2506.07.

(d) Leachate quantities shall be measured daily in accordance with Env-Wm 2506.05(e) and reported with precipitation information to the Department quarterly, in a format that presents monthly subtotals and the quarterly total.

(e) The quantity of leachate pumped off the secondary liner shall be measured daily in accordance with Env-Wm 2506.05(e) and reported to the Department quarterly, in a format that presents each monthly subtotal and the quarterly total. In addition, the permittee shall calculate the 30-day average flowrate and shall accordingly comply with the secondary liner flowrate reporting and action limit requirements of Env-Wm 250.05(g).

(f) Representative leachate analytical data shall be obtained and reported to the Department quarterly in accordance with the requirements of Env-Wm

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2506.05(f).

(g) The head on the primary liner system shall be measured daily, from which monthly averages shall be calculated and reported quarterly.

(h) Annual reports shall be submitted to the Department in accordance with the requirements of Env-Wm 311.07.

(7) <u>Pipe Removal</u>: The pipes in the temporary sideslope swales as depicted in detail 22 on sheet 37 of the permitted design plans as provided in the Permit Application, must be removed prior to filling over this area.

(8) <u>MSW Incinerator Ash Disposal</u>: The disposal of municipal solid waste incinerator ash shall occur only in accordance with the following practices, as appropriate:

(a) monofilled in accordance with the requirements of Env-Wm 2602.04; or,

(b) co-disposed in manner consistent with the provisions of the permittee's approved pilot demonstration project for ash co-disposal at the permittee's TLR-II facility, to be formally concluded prior to operating Phase 3 of this facility (TLR-III) by filing a final report with the Department; or

(c) the terms and conditions of any waiver to the provisions of Env-Wm 2602 granted by the Department resultant to the successful completion of the permittee's aforementioned pilot demonstration project. Successful completion shall be determined by the Department on the basis of a final report for the pilot demonstration project, to be prepared and submitted by the permittee in triplicate, that evaluates the data obtained during the pilot demonstration project and accordingly concludes that the monofilling requirements of Env-Wm 2602.04 should be waived to allow MSW incinerator ash to be co-disposed under controlled operating practices.

(9) <u>Stormwater Management</u>: The stormwater piping configuration in Phases 5, 6 & 7 is approved pursuant to a determination of functional equivalency with Env-Wm 2505.09
(d), based on the proposed operation of the drainage system as well as the 500,000 gallon on-site leachate storage and treatment facilities. If leakage within the drainage system is detected as evidenced by lowering of static water levels in the riser pipes,

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then use of the drainage system shall be discontinued until said leak is repaired. The permittee shall notify the Department when such conditions are identified and shall coordinate with the Department all necessary response action.

(10) <u>Leachate Recirculation</u>: At this time, leachate recirculation is apparently prohibited under 40 CFR Part 258.28 without the placement of a composite liner and leachate collection system that meets the standards of 40 CFR Part 258.40(a)(2). Consequently, the permittee is not permitted to recirculate leachate at this facility as was proposed in the Permit Application. Leachate recirculation may occur at this facility in accordance with the provisions of Section III/Condition (6) and Section VI/Condition (4) of this permit. Permit No. DES-SW-SP-95-001 / Terms & Conditions Waste Management of New Hampshire, Inc. TLR-III Refuse Disposal Facility Turnkey Recycling & Environmental Enterprises 97 Rochester Neck Road Rochester, New Hampshire 03839 April 10, 1995 Page 22 of 24



#### SECTION VIII: Closure and Post Closure Requirements

(1) <u>Requirements</u>: Closure of this facility shall comply with the following requirements, as in effect on the issue date of this permit and as may be amended subsequent to the issue date of this permit:

- (a) 40 CFR Part 258, as provided in the Department's "Guidance Document for the State Permitting of Municipal Solid Waste Landfills Regulated under Federal Rules (40 CFR 258) in New Hampshire";
- (b) RSA 149-M;
- (c) the <u>New Hampshire Solid Waste Rules</u> (ref. Env-Wm 100-300 & 2100-2800), specifically including Env-Wm 308, 310, 312, 2507 and 2600;
- (d) all conditions of this permit;
- (e) the Closure Plan found in Section 8 of the Permit Application, except as amended by the terms and conditions of this permit;
- (f) the provisions of any other present or future requisite federal, state or local permits, licenses or approvals that apply to closure of this facility; and
- (g) the terms of any authorization granted by the Department to construct any portion of the required closure system, pursuant to the provisions of Section IV of this permit.

(2) The provisions of Sections III -V of this permit apply to the design and construction of the facility's closure systems.

(3) The schedule for capping this facility shall conform to that provided in the Closure Plan presented in Section 8 of the Permit Application.

(4) The permittee is responsible for implementing and meeting the requirements for landfill closure as set forth in Env-Wm 2507.03 and 2507.04, for whatever length of time is required to achieve the performance criteria specified in Env-Wm 2507.05(a)(1) -(4).

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Although the <u>Rules</u> contemplate in Env-Wm 2507.05 that such performance criteria may be met within 30 years of final capping the facility, the actual post-closure monitoring and maintenance period for this facility may be different than 30 years, to be determined by the Department on the basis of periodic review and evaluation of the post-closure monitoring data. Therefore, the permittee shall, no less than annually and in accordance with Env-Wm 311.07, prepare and submit an Annual Report that provides all required post-closure monitoring and maintenance data with an evaluation of that data by a qualified professional engineer licensed in New Hampshire. The evaluation shall characterize actual facility performance, identify any specific data trends that develop and assess the meaning of those trends as they may apply to meeting the performance criteria in Env-Wm 2507.05(a)(1)-(4).

(5) No later than 10 years following the date on final closure, but earlier if determined necessary by the Department, the post-closure monitoring and maintenance period shall be adjusted to reflect actual conditions at the facility. If such adjustment results in extending the post closure period beyond the 30 year period specified in Env-Wm 2507.05, the permittee shall provide additional financial assurance in accordance with Env-Wm 313 and Section IX of this permit.

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#### **SECTION IX:** Financial Assurance

(1) <u>Cost Estimate</u>: Pursuant to Env-Wm 313, an itemized estimate for the most current cost of closing this facility shall be calculated and maintained with facility records at all times. The cost of closure shall be determined on the basis of the facility's approved closure plan and information submitted per Section IV/Condition (1)(c) such that the permittee shall always maintain adequate funds to close the facility, if necessary, upon completion of any phase that is approved to operate, as though no subsequent phase will be built or operated. The estimate shall be updated no less than annually and submitted to the Department in accordance with Env-Wm 311.07(d). In addition, the most current estimate of record shall be otherwise updated and submitted prior to effecting any modification to facility operations that changes the estimate of record. Further, the Department reserves the right to require at any time that the cost estimate for facility operating costs and/or market conditions, or to reflect cost information that the Department may independently obtain that demonstrates the actual closure costs are different than the most current cost estimate of record.

(2) <u>Proof of Financial Assurance</u>: The permittee shall, no less than annually in accordance with the provisions of Env-Wm 311.07(d), provide proof of financial assurance based upon the current estimated cost of a third party to perform all required closure and post-closure work. (RSA 149-M:10, V-b and Env-Wm 313). Proof of financial assurance shall be provided by the permittee through one or a combination of the mechanisms identified in Env-Wm 313.02, and is subject to approval by the Department.

(3) <u>Maintenance of Financial Assurance</u>: Implementation and maintenance of an approved financial assurance plan is required to commence and continue operations of this facility. At no time during the life of this facility shall the permittee allow financial assurance for the cost of closure to lapse or to be underfunded.

## NOTICE OF INTENT TO CONSTRUCT SOLID WASTE MANAGEMENT FACILITY

Pursuant to the conditions of your permit and in accordance with the requirements of Section Env-Wm 310.03(b) of the <u>New Hampshire Solid</u> <u>Waste Rules</u>, you are required to file the following information with the New Hampshire Department of Environmental Services Waste Management Division (DES) no less than 2 weeks, but no more than 4 weeks, **prior** to commencing construction of a facility.

Provide all of the following information as indicated and return TWO COPIES to:

Department of Environmental Services, Waste Management Division **Permit Application & Design Review Section** 6 Hazen Drive Concord, New Hampshire 03301-6509

#### FACILITY IDENTIFICATION:

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

Location:

Permit No.: \_\_\_\_\_

#### PROJECTED CONSTRUCTION SCHEDULE AND MANAGEMENT:

Estimated starting date: \_\_\_\_\_ Estimated completion date: \_\_\_\_\_

Attach a project construction schedule to identify the anticipated dates for starting and completing each major construction task for this project.

Identify below the names and affiliations of the person(s) who will be in charge of construction at this facility:

Name		Affiliation		Telephone #	
Identify below the names,	affiliation and PE license	e number of the project e	engineer and reside	ent engineer assigned to	o this project:
Name		Affiliation		PE license #	
······································	i				

(project engineer)

(resident engineer)

#### SIGNATURE REQUIREMENTS

I hereby certify that the foregoing information concerning construction of this facility accurately represents the anticipated plans for construction of this facility. In the event significant changes are to occur, including a change in schedule or contractor, I will so notice the DES. I hereby certify that all requisite local, state and/or federal approvals or permits required for the construction of this facility have been

obtained.

I hereby reconfirm representations made in the associated permit application that the proposed plans for construction of this facility meet all requirements of the rules and regulations that apply to the construction of this facility.

I acknowledge that authorization to construct this facility is contingent upon compliance with the <u>New Hampshire Solid Waste Rules</u>, specifically including Env-Wm 310, and the conditions of the facility's permit.

As required by Env-Wm 310.14, within 90-days of completing construction, record drawings shall be submitted to the DES, in duplicate, in sufficient detail to show the as-built location and layout of facility.

I hereby certify that a copy of this notice has been provided to the town and solid waste management district in which this facility is located.

Permittee	Name	(Print or	Туре)
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Co-Permittee Name (Print or Type)

Date

Co-Permittee Signature

Date

Permittee Signature

NOTICE OF INTENT TO OPERATE					
SOLID WASTE MANAGEMENT FACILLY I					
Pursuant to the conditions of your permit and in accordance with section Env-Wm 311.04 of the <u>New Hampshire Solid Waste Rules</u> ( <u>Rules</u> ), you are required to file the following information with the New Hampshire Department of Environmental Services Waste Management Division (DES) at least 5 business days prior to commencing operation of a facility.					
Provide all of the following information as indicated and return TWO COPIES to:					
Department of Environmental Services, Waste Management Division Permit Application & Design Review Section 6 Hazen Drive Concord, New Hampshire 03301-6509					
In addition, you are required to supply copies of this notice to the town and the solid waste district in which this facility is located.					
FACILITY IDENTIFICATION:					
Name:					
Location:					
Permit No.:					
DATE OPERATIONS WILL COMMENCE: / / /					
CERTIFIED OPERATOR IDENTIFICATION:					
Name:					
Telephone Number:					
Certification #/Expiration Date:					
FACILITY MANAGER IDENTIFICATION:					
Name:					
Telephone Number:					
FINANCIAL ASSURANCE: As a condition of your permit, you are required to maintain sufficient funds to cover the cost of closing this facility. In your permit application, you declared an intent to do so by one of several available methods. Maintenance of financial assur- ance is an on-going requirement for any operating facility. Prior to operating this facility you must assure that you have filed with the DES all final financial assurance documents. Attach such documents to this notice, if not already submitted. Failure to maintain financial assurance may result in civil penalties or suspension/revocation of your permit.					



# Disposal Facility Audit Package

Cycle Chem, Inc. Elizabeth, New Jersey

Revised: September, 2018

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## **COMPANY OVERVIEW**

ACV Enviro is a leading North American provider of environmental services to commercial and government entities. Founded in 1976, our firm is one of the oldest waste management companies in

the United States, a true tribute to our ongoing dedication to manage remediation and environmental issues across the United States. Our environmental expertise extends to all types of remedial actions including excavation and removal, transportation and disposal (T&D), contaminated soil excavation, in-situ and exsitu Treatment, landfill closures, chemical lagoon closures, facility decontamination, industrial cleaning, dredging/VAC, and PCB abatement. We have successfully designed, managed and completed a broad range of hazardous waste remediation and disposal projects throughout the country. Our field/ industrial services complimented by our 2 RCRA Part B Hazardous and Solid Waste Disposal facilities allow ACV to provide turnkey services to our customers.

Our field service crews are highly trained professionals meeting and/or exceeding all state and federal certification licensing and operating requirements. Our focus on safety, environmental compliance, and customer service enables us to effectively meet the needs of our customers and to build long-lasting relationships. A streamlined professional organization, effective management,

#### MISSION STATEMENT

To be the most-recognized leader for industrial, environmental and waste disposal services within chosen geographic regions.

We will be known for exceeding customer expectations for Safety, Compliance, Performance, and Value

innovative remedial construction practices, and nationally recognized transportation and disposal capabilities will allow our group of companies to successfully meet or exceed the goals for each of our customers.

Our two disposal facilities are strategically located in the Northeast. Our Elizabeth, New Jersey facility is one of only two commercial RCRA Part B permitted facilities in the New York metro area. Our Lewisberry, Pennsylvania is outside the Philadelphia metro area. As fully permitted RCRA Part B facilities for the treatment and processing of hazardous and non-hazardous soils, bulk liquids, bulk solids, and drums, these facilities are the facilities of choice for the management of hazardous and nonhazardous waste streams.

With a network of over 20 service facilities and 2 disposal facilities serving the United States, including many of the country's key industrial centers. Our years of experience have allowed us to develop unique relationships with recycling and disposal facilities located throughout the United States, Canada and Mexico in order to meet all of the environmental needs of our customers.

## HEALTH AND SAFETY

ACV Enviro and all of its companies (Allstate Power Vac, Clean Venture, Cycle Chem and Envirotech) are committed to providing a safe working environment that incorporates health and safety as a main priority in all operational procedures. Safety is extremely important to the company for the well-being of the environment, as well as the public and employees, and is a non-negotiable element of all work activities. Trained employees allow ACV to provide their services without slowing the project down unnecessarily as changing conditions develop or safety issues arise.

ACV completes most of the required training in-house, so we can ensure that employees receive specific information about the types of tasks that will be required of them. These programs are designed to help field employees obtain as much information as possible about precautionary measures and necessary procedures during site activities. Our training staff attends other third-party training along with obtaining proper certifications/ authorizations (OSHA 500 series, CPR/First Aid, Heavy Equipment, etc) in order to conduct the needed training.

All of the health and safety programs are developed to comply with the requirements of 29 CFR 1910.120 along with other required training. Employees are trained in the following:

- Initial 40-hour HAZWOPER
- Annual 8-hour refresher
- Confined Space Entry
- DOT HM126 and 232
- Site Specific

The commitment to health and safety is strengthened through various employee participation programs used. The company holds daily, weekly, and monthly safety meetings with field supervisors and technicians so they understand and are committed to the company's safety goals. Different safety issues are discussed at these meetings to help improve awareness, procedures, and proper equipment use. Also, the Environmental, Health and Safety (EHS) Department insures that field projects are being completed in accordance with governmental regulations and company standards by conducting random audits weekly. Audit reports are reviewed and distributed so managers and supervisors can help improve their service centers.

Our safety program is continually measured through a variety of metrics including:

- Monthly Safety Committee Meetings;
- Incident Review Team (IRT) Meetings IRTs are required on incidents based on pre-determined criteria and within a certain time after an incident / near-miss;
- Internal Inspections Internal inspections are required monthly for all facilities;
- Good Catch/ BBS Observations This segment helps to increase the field crew participation in the auditing program.
- TRIR and DART Total Recordable Incident Rates (TRIR) and Days Away and Restricted Rates;

- Compliance Calendar review Each facility representative reviews a facility specific compliance calendar each month to make sure all permit requirements, inspections, regulatory obligations, etc. are being completed;
- EHS Training Completed through hands on training in the field, structured training classes, distribution of safety splashes, newsletters and variety of other methods to help train and increase awareness with employees.

Consistent with our core values, we conduct our operations in a manner protective of human health and the environment. As part of our culture, the "Safe or Stop" program is part of each employee's daily work. Employees are expected to identify, stop and protect both fellow workers and the general public from unsafe hazards or conditions. It is each person's responsibility to ensure their own safety along with their co-worker's safety.

## **SERVICE LOCATIONS & DISPOSAL FACILITIES**

With over 15 industrial/field service locations and 2 disposal facilities strategically located through the Northeast, ACV Enviro is well-positioned to provide turnkey environmental services to our customers.

#### New York/ New Jersey Metro

- Corporate Office-Avenel, New Jersey
- Rahway, New Jersey
- Elizabeth, New Jersey
- Brooklyn, New York
- New Windsor, New York
- Long Island City, New York

#### Phildelphia Metro

- Aston, Pennsylvania
- Clayton, New Jersey

#### New England

- Skowhegan, Maine
- Norfolk, Massachusetts
- Nashua, New Hampshire
- Woonsocket, Rhode Island
- Bridgeport, Connecticut

#### Pennsylvania Region

- Harrisburg, Pennsylvania
- Williamsport, Pennsylvania
- Pulaski, Pennsylvania

#### Mid-Atlantic

- Baltimore, Maryland
- Ashland, Virginia

#### Mid-West

- Big Bend, Wisconsin
- Hammond Illinois

#### RCRA Part B TSDFs

- Elizabeth, New Jersey
- Lewisberry, Pennsylvania



## **FACILITY OVERVIEW**

ACV's Cycle Chem disposal facility is located in Elizabeth, New Jersey. This is one of only 2 permitted RCRA Part B facilities in New Jersey, located only 7 miles from NYC, the largest metropolitan center in the United States. This facility has the ability to manage the disposal of RCRA, PCB and Nonhazardous waste streams. Since 1976, the facility has served customers throughout the Northeast.

The facility provides stabilization, solidification, consolidation and brokerage services for our international, industrial, and government customers.

In 1993, a major construction upgrade project on its entire facility. Included with this project was an expansion of the tank farm, and fuels blending operation, installation of a bulk solids consolidation-solidification facility, re-padding of the entire waste process area and other significant changes. These facility upgrades were completed in 1995.

In 2018, the facility added a front canopy and ramp area to aid in off-loading capabilities. In addition, a new storage/ consolidation building with 3 pits and drum storage area is currently in the approval permitting phase and is expected to be built in 2019-2020.

As a result of ownership change, the property is performing site remediation activities in accordance with NJDEP and EPA oversight. As a result of the remediation activities it is anticipated that a groundwater treatment plan and repaying of the entire facility will be completed in 2019.



## FACILITY GENERAL INFORMATION

Name of Facility:	Cycle Chem, Inc.
Facility Address:	217 South First Street Elizabeth, New Jersey 07206
Facility phone number:	(908) 355-5800
Facility Contact	Matthew Smith General Manager
	Jim Butler EH&S Compliance Manager
Facility Size:	2.03 acres
Number of employees at this location:	55 (average)
Owner:	ACV Enviro CC Holding Corporation 1500 Rahway Avenue Avenel, New Jersey 07001
Previous site owner(s) and site use(s):	Perk Chemical Company 1962-1985 Solvent Recycling & Reclamation
Permit Information:	EPA ID Number NJD002200046
	RCRA Part B Hazardous & Solid Waste Permit HWP060001 Expiration Date: July 9, 2022

## **ENVIRONMENTAL RISKS**

Population of local municipality:	30,209 within 1 mile and 185,831 within 3 miles
Distance from nearest residential area:	500-1000 feet of facility
Bodies of water are within 1/2 mile of facility:	Elizabeth River and Arthur Kill
Distance to drinking water supply?	Greater than 2 miles
Closure Plan/ Fund	Letter of Credit (\$840,000)

## WASTE STORAGE/WASTE PROCESSING

The Elizabeth facility provides storage, transfer, and treatment services under its RCRA Part B Hazardous & Solid Waste facility permit. It has the ability to provide flexibility with final treatment technologies consistent with Federal regulations and client needs. It performs both chemical and physical treatments; blending/mixing, crushing and compacting, straining, decanting, bulking/consolidation/lab packs, metals contaminated materials stabilization, solidification, fluidization, separation, adjusting pH, reactive sulfides and hydration - oxidizers. Rapid response to pricing and approval requests is part of the standard service offered.

Total Permitted Storage	Total	393, 628 gallons
	(RCRA	249,999 gallons)

#### Waste/Product Storage Tanks

Total: 82,520 gallons Capacity to be stored in 10 above ground storage tanks. Capacities range from 7,500 gallons to 10,000 gallons.

No incompatible waste is stored within the same secondary containment system. There are two separate secondary containment systems.

#### **Waste Treatment Units**

Two soil bunkers for bulking/solidification and/or treatment of metal bearing wastes

Secondary containment consists of sloped concrete pad to accumulate collection system. Entire site is surrounded by a 6" curbing for tertiary containment. No incompatible wastes are stored together.

#### TSCA/ PCB Waste

The facility is limited to a total of 18,500-gallons of PCB waste on-site based on the following:

- 13,750 gallons in drums
- 5,200 gallons bulk

#### **Emergency Equipment**

The facility sprinkler system was recently upgraded in 2018. An extensive fire protection system is installed, along with various sizes of fire extinguishers. The fire protection system is a dry system with foam upon demand to sprinklers. The 24-hour fire surveillance system is connected to the local Fire Department.

### WASTE STREAM ACCEPTANCE

#### **Accepted Waste Streams**

Various waste streams are accepted at this facility. This includes:

- Nonhazardous Liquids, Solids and Sludges
- Hazardous Liquids, Solids and Sludges- All EPA waste codes
- TSCA/ PCB Liquid, Solids, and Sludges
- Universal Waste

#### **Not Accepted Waste Streams**

- Organic Peroxides
- Explosives, shock-sensitive
- Infectious/ BioHazards

In cases where waste is not accepted, our personnel can still help manage these waste streams for customers. Through our network of disposal facilities, we have the ability to provide cost effective disposal options for these waste streams.

## WASTE ANALYSIS AND DISPOSAL

The Elizabeth facility receives both containerized and bulk shipments of various liquids, sludges, and solids. The facility procedures include drum in/drum out consolidated shipments, processing pits for solidification and stabilization, and management of PCB and Universal waste streams.

Wastes that are not suitable for processing or treatment at the facility are transshipped to other off-site locations to be managed. The facility maintains active agreements with other disposal facilities in order to provide safe and cost-effective options to their customers.

#### Waste Analysis Plan

The facility maintains a waste analysis plan in accordance with 40 CFR 264.13 (b).

The Elizabeth facility maintains a New Jersey certified laboratory in order to ensure compliance with the requirements of the disposal facility and ensure that incoming waste streams meet the proper treatment standards for waste consolidation, treatment and disposal.

Quality control analysis consists of physical description, paint filter test, pH screening, water solubility, flammability potential, cyanide, PCBs, and Oxidizer. As part of the operating criteria, all sample results are maintained for a period of five years.

#### **Drums/ Containerized Wastes**

100% of all containers are examined upon receipt. This included a visual & where appropriate analytical analysis. In some cases, compositing may be done for up to ten drums. Different generators are never combined for composite sampling. Various quality control testing is done to ensure compliance with the facility operating permit.

#### **Bulk Waste Shipments**

All bulk shipments are sampled prior to being managed to ensure that waste meets the facility requirements and the necessary treatment or consolidation methods that will be used.

## COMPLIANCE/ENVIRONMENTAL OVERVIEW

This facility is inspected by the New Jersey Department of Environmental Protection (NJ DEP) and by the US Environmental Protection Agency (EPA). Typically, NJ DEP inspects the facility twice per month and EPA typically completes an annual inspection.

In addition to state and federal oversight, as part of permit requirements and best practices, internal audits are also completed in accordance with the Internal Inspection procedures (ENV-OP-051-IDS). Audits are conducted weekly, monthly, and quarterly to ensure operations are being conducted and waste streams are properly stored in accordance with operating permit and state/federal regulations.

Waste storage pad is a minimum of six inches thick of impermeable concrete with a permeability rating of no greater than 10<sup>-6</sup> centimeters per second. The storage tanks secondary containment consists of two separate containment systems to separate incompatible waste.

## LABORATORY SERVICES

Chemical characterizations and quality control analysis is performed in our New Jersey state certified laboratory (Certification #20109).

Laboratory equipment utilized includes:

- Wet Chemistry
- Spot Tests/ Colormetric Tests
- Gas Chromatograph with electron capture detector- PCBs
- Flashpoint/ Flammability
- Calorimeters
- Total Organic Carbon (TOC) Machine

## Appendix 1 Certificate of Insurance

ACORD <sup>®</sup> CI	ER	FIF	ICATE OF LIAI	BILI	TY INSU	JRANC	E 11/1/2018 DATE	(MM/DD/YYYY) 1/2017
THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.								
If SUBROGATION IS WAIVED, subject this certificate does not confer rights t	to th to the	ADD ie ter certi	rms and conditions of th ificate holder in lieu of su	ie polic uch end	y, certain po lorsement(s)	olicies may	require an endorsement. A si	e endorsed. atement on
PRODUCER LOCKTON COMPANIES 500 West Monroe, Suite 3400				CONTAC NAME: PHONE (A/C, No	:T . Ext):		FAX (A/C, No):	
(312) 669-6900				ADDRES	is: Ins	URER(S) AFFOR	RDING COVERAGE	NAIC #
INSURED Cycle Chem, Inc.				INSURE	ка:Steadfa кв:	ist Insuran	ce Company	26387
Elizabeth, NJ 07206				INSURE	R c : Zurich A R D :	American Ir	nsurance Company	16535
COVERAGES CER	TIFIC		NUMBER: 1503686		R E : R F :			XXXXX
THIS IS TO CERTIFY THAT THE POLICIES INDICATED. NOTWITHSTANDING ANY RE CERTIFICATE MAY BE ISSUED OR MAY EXCLUSIONS AND CONDITIONS OF SUCH	of 1 Quir Pert Polic	NSUF REMEI AIN, CIES.	RANCE LISTED BELOW HAN NT, TERM OR CONDITION THE INSURANCE AFFORDI LIMITS SHOWN MAY HAVE	VE BEEI OF ANY ED BY BEEN R	n Issued to Contract The Policies Educed by I	THE INSURE OR OTHER S DESCRIBE PAID CLAIMS	ED NAMED ABOVE FOR THE POL DOCUMENT WITH RESPECT TO D HEREIN IS SUBJECT TO ALL	licy period Which this The terms,
INSR LTR TYPE OF INSURANCE	ADDL.	SUBR WVD	POLICY NUMBER	1	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A X COMMERCIAL GENERAL LIABILITY CLAIMS-MADE X OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: X POLICY PRO- JECT LOC OTHER:	N	N	GPL 0160671-01		11/1/2017	11/1/2018	EACH OCCURRENCE       \$ 2,0         DAMAGE TO RENTED       PREMISES (Ea occurrence)       \$ 100         MED EXP (Any one person)       \$ 15,         PERSONAL & ADV INJURY       \$ 2,0         GENERAL AGGREGATE       \$ 6,0         PRODUCTS - COMP/OP AGG       \$ 4,0         \$       \$	00,000 ),000 000 00,000 00,000 00,000
C AUTOMOBILE LIABILITY ANY AUTO OWNED AUTOS ONLY HIRED AUTOS ONLY AUTOS ONLY AUTOS ONLY	N	N	BAP 0160669-01		11/1/2017	11/1/2018	COMBINED SINGLE LIMIT \$ 1,0 (Ea accident) \$ 1,0 BODILY INJURY (Per person) \$ XX BODILY INJURY (Per accident) \$ XX PROPERTY DAMAGE \$ XX (Per accident) \$ XX	00,000 XXXXXX XXXXX XXXXX XXXXX XXXXX
A UMBRELLA LIAB X OCCUR X EXCESS LIAB CLAIMS-MADE	N	N	SXS 0160706-01		11/1/2017	11/1/2018	EACH OCCURRENCE \$ 10, AGGREGATE \$ 10, \$ X X	000,000 000,000 XXXXX
C WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N/A	N	WC 4915409-17		11/1/2017	11/1/2018	X     PER STATUTE     OTH- ER       E.L., EACH ACCIDENT     \$ 1,0       E.L., DISEASE - EA EMPLOYEE     \$ 1,0       E.L., DISEASE - POLICY LIMIT     \$ 1,0	00,000 00,000 00,000
A Env. Impairment A E&O & Pollution Liability	N	N	EPC 0160703-01 GPL 0160671-01		11/1/2017 11/1/2017	11/1/2018 11/1/2018	\$5,000,000 Each Occ/\$10,000,000 SEE ATTACHED FOR LIMITS ( INSURANCE	) Agg )F
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required) CERTIFICATE HOLDER CANCELLATION See Attachments								
15036860 Evidence of Insurance				SHO THE ACC	ULD ANY OF EXPIRATION ORDANCE WI	THE ABOVE D N DATE TH TH THE POLIC	DESCRIBED POLICIES BE CANCEL EREOF, NOTICE WILL BE DE CY PROVISIONS.	LED BEFORE LIVERED IN
1				AUTHO			BBL COPPOPATION AND	hts record

The ACORD name and logo are registered marks of ACORD

#### 2017-2018 Professional and Contracting Services Proposal

Policy Number: GPL 0160671-01					
Coverage	Each Occurrence Limit	Coverage Aggregate	Self-Insured Retention		
Professional Liability	\$5,000,000	\$10,000,000	\$50,000		
Transporters Auto Pollution Liability	\$5,000,000	\$10,000,000	\$50,000		
Remediation Legal Liability	\$5,000,000	\$10,000,000	\$50,000		
Contractor's Pollution Liability	\$5,000,000	\$10,000,000	\$50,000		

Policy Number: EPC 0160703-01							
Coverage	Each Pollution Condition Limit	Coverage Aggregate	Self-Insured Retention				
Pollution Legal Liability	\$5,000,000	\$10,000,000	\$50,000				
Non-Owned Disposal Site	\$5,000,000	\$10,000,000	\$50,000				
In-Bound and Out-Bound Contingent Transportation	\$5,000,000	\$10,000,000	\$50,000				
Covered Locations Schedule -Clean Venture, Inc. & Cycle Chem, Inc.							
--	-------------	---	-------	--	--	--	--
Street Address	City	State	Zip				
201 - 217 South First Street	Elizabeth	L I I I I I I I I I I I I I I I I I I I	7206				
219 - 235 South First Street	Elizabeth	C/I	7206				
2931 Whittington Avenue	Baltimore	MD	21230				
2915 Whittington Avenue	Baltimore	MD	21230				
550 Industrial Drive	Lewisberry	PA	17339				
621 Lowther Road	Lewisberry	PA	17339				
133 - 138 Leland Street	Framingham	MA	1702				
600 Cenco Boulevard	Clayton	τ	8312				
23655 Royal Oak Road	Quantico	MD	21856				
226-304 South First Street	Elizabeth	LU	7206				
230-238 Butler Street	Elizabeth	LΝ	7206				
36 Butler Street	Elizabeth	NJ	7206				
606 Dowd Avenue	Elizabeth	NJ	7206				
1106 River Road	New Windsor	NY	12553				
29 Pennell St.	Skowhegan	ME	4976				
41 Pennell St.	Skowhegan	ME	4976				

÷.

# Appendix 2 Waste Profile Sheet

# Appendix 3 Facility Permits

### State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Solid & Hazardous Waste Bureau of Recycling & Hazardous Waste Management 401 East State Street P.O. Box 420, Mail Code 401-02C Trenton, NJ 08625-0420 Tel (609) 984-3438 Fax (609) 777-1951/984-0565 www.nj.gov/dep/dshw/recycling/

Solid and Hazardous Waste Facility Permit

Under the provisions of N.J.S.A. 13:1E-1 et seq. known as the Solid Waste Management Act, this permit is hereby issued to:

Cycle Chem, Inc. 217 South First Street Elizabeth, New Jersey 07206-1502

For the Purpose of Operating a:

Block No.: Lot Nos.: Municipality: County: Under Facility Permit No.: EPA ID No.: Solid and Hazardous Waste Treatment, Storage, and Transfer Facility 2 865 and Part of 74 City of Elizabeth Union HWP060001 NJD002200046

This permit is subject to compliance with all conditions specified herein and all regulations promulgated by the New Jersey Department of Environmental Protection (hereinafter referred to as the Department).

This permit shall not prejudice any claim the State of New Jersey (hereinafter referred to as the State) may have to riparian land, nor does it allow the permittee to fill or alter or allow to be filled or altered in any way, lands that are deemed to be riparian, wetlands, stream encroachment areas or flood plains, or that are within the Coastal Area Facility Review Act (CAFRA) zone or are subject to the Pinelands Protection Act of 1979, nor shall it allow the discharge of pollutants to waters of this State without prior acquisition of the necessary grants, permits, or approvals from the Department or the U.S. Environmental Protection Agency (EPA).

June 9, 2017 Issuance Date July 9, 2017 Effective Date July 9, 2022 Expiration Date

Buch far

Zafar M. Billah, Acting Chief Bureau of Recycling & Hazardous Waste Management

CHRIS CHRISTIE Governor

KIM GUADAGNO Lt. Governor BOB MARTIN

Commissioner

### UNITED STATES OF AMERICA DEPARTMENT OF TRANSPORTATION PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION



## HAZARDOUS MATERIALS CERTIFICATE OF REGISTRATION FOR REGISTRATION YEAR(S) 2018-2021

**Registrant:** CYCLE CHEM INC

ATTN: julius hausker 1500 RAHWAY AVENUE AVENEL, NJ 07001

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

 Reg. No:
 091218600009AC
 Effective:
 July 1, 2018
 Expires:
 June 30, 2021

 HM Company ID:
 36955

### **Record Keeping Requirements for the Registration Program**

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.

### Cycle Chem, Inc, 217 South First Street Elizabeth, New Jersey 07206

### Combined SPCC/DPCC Plan SPCC 40CFR112 DPCC NJAC 7:1E

Prepared By:

James Butler Regulatory Compliance Officer Written 11/98 Revised 2000 - 2003 Revised & reordered 1/06 – For DPCC/SPCC renewal review Revised for DPCC review 10/06 & 1/07 Reviewed for 1/09 DPCC/SPCC & renewal review 1/10, 3/10 Update schedule revised 5/10 Reviewed 1/12 DPCC/SPCC & renewal review Revised 1/13 per renewal review Revised 1/15 & 7/15 DPCC/SPCC & renewal review Changed responsible official 9/16

### SPCC 40CFR117 CERTIFICATION

Name of Facility:

Type of Facility:

**Facility** Location

**Owner/Operator** 

Cycle Chem, Inc.

Hazardous Waste Facility

217 South First Street Elizabeth, New Jersey 07206

Cycle Chem, Inc., 217 South First Street Elizabeth, New Jersey 07206

Telephone Number:

SEAL

(908) 355-5800

Facility Personnel: Responsible for Spill Prevention Michael S. Persico-President

### **ENGINEER CERTIFICATION:**

I hereby certify that I have examined the facility and being familiar with provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

GERALD G. GARDNER

Name of Registered Professional Engineer

Signature

---

Date

**Registration Number** 

CCI-DPCC/SPCC Plan - 2015 renewal

### **DPCC NJAC 7:1E- CERTIFICATION**

ENGINEER CERTIFICATION;

Name of Facility:

Cycle Chem, Inc.

Type of Facility:

Hazardous Waste Facility

Facility Location

**Owner/Operator** 

217 South First Street Elizabeth, New Jersey 07206

Cycle Chem, Inc., 217 South First Street Elizabeth, New Jersey 07206

I hereby certify that I have examined the facility, reviewed the plan, and attest that this DPCC Plan has been prepared in accordance with good engineering practices and complies with all applicable department requirements.

Shaw.	GERALD G. GARDNER
SEAL	Name of Registered Professional Engineer
	Signature 2/9/15
	Date NJ 25844
	Registration Number

CCI-DPCC/SPCC Plan - 2015 renewal

# State of New Jersey Department of Environmental Protection Certifies That

CYCLE CHEM, INC. Laboratory Certification ID # 20109

having duly met the requirements of the Regulations Governing the Certification of Laboratories and Environmental Measurements N.J.A.C. 7:18 et. seq.

> is hereby approved as a **State Certified Environmental Laboratory** to perform the analyses as indicated on the Annual Certified Parameter List which must accompany this certificate to be valid

> > Expires June 30, 2019



Michele M. Potter Manager

THIS CERTIFICATE IS TO BE CONSPICUOUSLY DISPLAYED AT THE LABORATORY WITH THE ANNUAL CERTIFIED PARAMETER LIST IN A LOCATION ON THE PREMISES VISIBLE TO THE PUBLIC

# Appendix 4 Facility Inspection Checklists

## **INSPECTION SUMMARY**

Date:

Inspector: Jim Butler ~@ 8AM

	Inspected for:	DAILY	WEEKLY	MONTHLY
	CONTAINERS			
Containers	Number/Inventory			
	Damage/leaks			
	Labels			
	Segregation by waste type			
	Aisle Space/stacking height			
Pallets Secondary containmen	Damage, deterioration			
Container inspection	Non Bulk <110 gallons			
{Sub CC}, closed, DOT	Bulk \119 gallons			
	Durk >11) ganons			
TANKS	EXTERNAL / TRUCK RACKS / O	THER PIP	ING AREA	S
Liquid level gauges	Function/Inventory			
High level alarms	In-service status			
	Function			
Waste feed cutoffs	In-service status			
Waste feed eutoffs	Function			
Secondary containment	t Cracks, spalling, settling,			
Tank ID markings	Visibility			
Tank ID, markings	Corrosion, deterioration, discoloration, bulging,			
Shell, roof	cracking, perforations			
Pipes, fittings, valves	Leaks, corrosion, damage, deterioration			
Valves monitored	>10000 [no leak 2 moquart.			
Tank vents, openings of	closed & good condition			
Ladders, platforms	Stability, damage, deterioration			
Anchor bolts/foundations	Distortion, corrosion			
Other Piping Areas: {E	PCC} leaks, containment structure			
Loading racks {DPCC	} hoses, leaks, containment			
Anchor bolts/foundations	Distortion, corrosion			
Truck racks/hoses: lea	ks, containment structure			
Other Piping Areas: le	aks, containment structure			

Any deficiencies noted on attached sheets. summation of Part B Permit, 40CFR264, SPCC, DPCC, storw water

	Inspected for:	DAILY	WEEKLY	MONTHLY
	SAFETY/EMERGENCY EQU	JIPMENT		
Alarms	Function			
Tele, communication	Function			
First Aid/Prot. Clothing	Availability			
Safety Showers	Function			
Spill Control supplies	Availability/location			
Fire Control System	In-Service Status Function			
GE	ENERAL FACILITY SAFETY	& SECURI	ГҮ	
Housekeeping	clean, order			
Evacuation Routes	Obstructions			
Fence, gates	Security, function			
Warning signs	Availability, legibility			
Response equipment, inver	ntory, condition			
accessibility, as per SPCC	plan.			
Air Monitoring-ppm	Soil Bunker if >0.5 ppm so note			
	STORMWATER			
Check:2' buffer zone along	ditch curb.			
Spills cleaned up; area sun	np pump & valve ok			
Check:outback,gates 4/5 tr	acking and spills in ditch			
DPCC-no problems found.	deficiences as noted			

Non-bulk <119	gallons closed, go	od condition		
Bulk >119 gall	ons DOT pacl	kage, good		

## **Inspection Results**

Area	Row	Tier	Up Front/Puddle areas
Area	Dow	Tion	Under Conony Dight Side
Alta	NUW	Tiel	Chuer Canopy Kight Side
Area	Row	Tier	In Front Tanks/Pump Area
Area	Row	Tier	Under Canopy Left Side
<b>A</b> mag	Door	Tion	Lok Deck Auss
Area	KOW	Tier	Lad Pack Area
Area	Row	Tier	Out Back/Pit

# Appendix 5 3 Year Compliance History

# Disposal Facility Violation History (3 years)

Date	Company	Permit ID	Permit ID Issuing Type of Action Nature of Violation		Status/ Corrective Actions	
2015			0 /			
1/7/2015	Cycle Chem Inc Elizabeth		US EPA		There was an analytical process discrepancy [involving the LDR 10 ppm treatment level] between CCI and the disposal facility that forced CCI to store certain PCB wastes for over a year while the analytical discrepancy was worked out. CCI notified the EPA about the situation and requested an additional year of storage. However CCI was late in supplying this notification with the result that some items covered under that notice were already over a year old. The analytical discrepancy has been worked out and all the items covered under the EPA notice have been disposed of.	Consent Agreement
11/5/2015	Cycle Chem Inc       NJDEP       Notice of Violation       Failure to comply with permit conditions by accepting unapproved waste due to a       N         Elizabeth       Notice of Violation       Mage: Alignment with the state regarding the classification of petroluem contaminated septic       S		No penalty assessed, Stopped accepting this			
2016						type of waste- closed
7/27/2016	Cycle Chem Inc Elizabeth		US EPA	Consent Order	Voluntarily disclosed to US EPA that the facility shipped PCB remediation waste for off-site disposal without identifying it as PCBs on the manifest and in turn disposed of waste in an non- authorized manner	Consent Agreement- All violations resolved, penalty paid
2017						
1/25/2017	Cycle Chem Inc Elizabeth	NJD002200046	NJ DEP	Notice of Violation	Vehicles were improperly lining up on the 3rd Avenue side of the facility. The facility has started to do more frequent monitoring and made additional notifications to the various haulers to explain the restrictions on that side of the facility	Settled/Closed
4/25/2017	Cycle Chem Inc Elizabeth	NJD002200046	US EPA	Consent Order	Improper disposal of PCB of a tote. Employee did not follow proper procedures and mixed material into a nonhaz bulk pit for off-site disposal without identifying it as PCBs on the manifest and in turn disposed of waste in an non-authorized manner	Settled/ Closed
4/25/2017	Cycle Chem Inc Elizabeth	NJD002200046	US EPA	Consent Order	Improper disposal of PCB of a tote. Employee did not follow proper procedures and mixed material into a nonhaz bulk pit for off-site disposal without identifying it as PCBs on the manifest and in turn disposed of waste in an non-authorized manner	Settled/ Closed
2018						
2/8/2018	Cycle Chem Inc Elizabeth	NJD002200046	NJ DEP	Notice of Violation	Facility handled a bulk shipment of Calcium Oxide in a manner which caused an exothermic reaction causing a release of caustic dust in violation of 40 CFR 264.31 When Calcium Oxide was mixed into nonhaz pit, a quick release of steam occurred appearing to have reacted.	Pending
3/15/2018	Cycle Chem Inc Elizabeth	NJD002200046	NJ DEP- Air	Notice of Violation	Facility failed to notify of a release of air contaminants from a reaction caused by Calcium Oxide (release of heat and steam)	Settled/ Closed
6/26/2018	Elizabeth       Oxide (release of heat and steam)         Cycle Chem Inc Elizabeth       NJD002200046       NJ DEP       Notice of Violation       Failure to maintain or operate facility to minimize possibilities of fire, explosion or release of hazardou waste or HW constituents. Specifically 4 drums of Hydrofluoric/ Nitric Acid mixture; Failure to comply with all conditions of permit (Condition #267) which requires the facility to comply with the non-has waste inspection plan or the haz waste analysis place in section "C" of the May 2006 permit renewal - section A.3 for incoming waste shipments. 40 CFR 264.31/ 40 CFR 270.30 (a)         Generator mislabeled containers as Sulfuric Acid, Material was found to be Nitric Acid and caused a reaction		Pending			

# APPENDIX M

# Situation #1 thru Situation #4 Memoranda

# Situation #1 Wastewater Sump Structure

02/12/2020



Gary Trombly, Jr. Department of Energy and Environmental Protection Storage Tank and PCB Enforcement Unit 79 Elm Street Hartford, Connecticut 06106

Re: Partial Consent Order #COWSPCB 15-001 English Station Remediation Situation 1 & 2 Memo

Dear Messrs. Trombly:

The United Illuminating Company (UI) is pleased to submit a memo to the Department's file for the above referenced site summarizing actions which took place during Situations 1 & 2. Situation 1 & 2 can be defined and referenced to in UI's email to the Department on January 22, 2020.

In accordance with Section B., 13 of the PCO, the undersigned have personally examined and are familiar with the information submitted in this document and all attachments thereto, and do certify, based on reasonable investigation, including their inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of their knowledge and belief. They understand that any false statement made in the submitted information is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.

Should you have any questions or comments regarding this document or any attachments hereto, please don't hesitate to contact Shawn Crosbie at (203) 926-4595.

THE UNITED ILLUMINATING COMPANY

Anthony Marone President and Chief Executive Officer The United Illuminating Company

Shawn C Crosbie Project Manager the United Illuminating Company

### MEMORANDUM

То:	Mr. Gary Trombly, Jr, CT DEEP Ms. Lori Saliby, CT DEEP
From:	Mr. Shawn Crosbie, UI Ms. Marya Mahoney, LEP, TRC Mr. Carl Stopper, PE, TRC
Subject:	English Station – Station B Situation #1 Resolution Concrete Sanitary Wastewater Sump Chamber TRC Project No.: 263951
Date:	February 5, 2020

#### Introduction

This memo has been prepared at the request of the Connecticut Department of Energy and Environmental Protection (CTDEEP) to summarize the results of the sampling, removal and disposal of the contents of the concrete sump chamber located as shown on the attached figure that was used to store sanitary wastewater from the former Station B building on Parcel A located at 510A Grand Avenue. The southeast corner of Station B formerly had a raised platform area that served as the access to the rear of Station B into the upper office area of the building. The surface of the platform was raised approximately 8' to 10' above the grade at the rear of the building. Beneath a portion of the raised platform there was a small steel hatch that allowed access to the manhole cover for the sump chamber approximately 2 feet below the platform. There were two pipe penetrations found inside the structure. The first pipe entered the chamber from Station B and the second pipe was attached to a small submersible pump with float switches that apparently discharged to the sanitary sewer to the east of the building. The concrete sump chamber interior dimensions measured approximately 5ft. by 5ft. by 6 ft. deep. Approximately 1ft. of standing water (liquid fraction) and 1ft. of black sludge (solid fraction) were found in the bottom of the structure. Due to the elevation of the platform area the sump chamber sat above the surrounding grade and was enclosed by the platform structure on three sides.

#### Sampling

On Friday, December 6, 2019 UI informed DEEP of the concern of the sump and materials within. On December 10, 2019 TRC was instructed by UI to collect separate samples of the water phase and the solid phase from the sump chamber. The samples were sent to Con-Test Laboratory for analysis. Copy of lab report attached. Both the solid and liquid phases were analyzed by the following methods and detection limits were below regulatory criteria for waste characterization:

- Volatile Organic Compounds (VOCs) EPA Method 8260
- Semi-Volatile Organic Compounds (SVOCs) EPA Method 8270

- RCRA 8 Metals EPA Method 6020 & 7470
- Polychlorinated Bi-Phenyls (PCBs) EPA Method 8082 with Soxhlet Extraction
- Extractable Total Petroleum Hydrocarbons (ETPH) CTDEEP Method
- Reactive Cyanide EPA Method 9014
- Reactive Sulfide EPA Method 9030
- pH EPA Method 4500(liquid)/9045(solid)
- Flashpoint (Water Only) EPA Method 1010
- % Solids (Solid Only) SM 245D
- Free Liquid (Solid Only) EPA Method 9095
- TCLP 8 RCRA Metals (Solid Only) EPA Method 6010 & 7470

PCBs were not detected (<0.2µg/L) in the water sample and the liquid fraction is therefore not USEPA or CTDEEP regulated for PCBs. The solid fraction contained PCBs equal to 1mg/kg and therefore is not USEPA or CTDEEP regulated for PCBs. The solid fraction also exhibited ETPH at 19,000mg/kg. The VOC and SVOC results for the liquid fraction were non-detect for all compounds. The VOC and SVOC results for the solid fraction had low level detections of several compounds. Lead was also detected in the liquid fraction below the RCRA hazardous waste regulatory threshold In the solid fraction all of the RCRA 8 TCLP metals were non-detect, except for barium at 0.58mg/kg. All of the other RCRA hazardous waste tests such as reactivity, ignitability, flashpoint and pH were below the RCRA hazardous waste thresholds. Based on the analytical data of both the liquid and solid fractions, these wastes were managed as state regulated wastes. Lab results can be viewed in the attached report identified as *19L0326 Contest Final 12-13-19*.

#### **Removal and Disposal**

Based on ACV Enviro's (ACV) onsite presence as the remediation contractor performing demolition and soil remediation on the site on behalf of UI, ACV was used to assist in the management and disposal of this waste. After discussion with UI, TRC and ACV it was determined that it would be difficult to separate the liquid and solid fractions and remove the two layers separately without stirring up the sludge into the liquid. The solid fraction was found to be only 37% solids based on the laboratory testing performed. Therefore, UI, TRC and ACV chose to use a high-pressure vacuum tank truck to remove both fractions and ship the material for disposal as a waste sludge. Based upon the testing performed the combined water/solid mixture was classified as State Regulated Waste Code CR04, which is a Waste Chemical Liquid. CR04 covers any wastes that are liquid, free flowing and/or contain free draining liquids and are toxic, hazardous to handle and/or may cause contamination of ground and/or surface water if improperly managed. These wastes may include but are not limited to latex and solvent paint wastes, grinding wastes, waste sludges, antifreeze wastes and glycol solutions. The sludge material was removed from the structure on December 31, 2019 and shipped to Tradebe Treatment and Recycling of Bridgeport, Connecticut for disposal under a Straight Bill of Lading (see attached). The combined waste volume was approximately 623 gallons. Once

all of the sludge residue was removed from the structure, ACV proceeded with demolition of the elevated platform structure surrounding the concrete sump chamber and the sump chamber itself. The rubble debris generated from the elevated platform demolition and the sump chamber were handled, managed and disposed of as PCB Excluded Waste with asbestos. That material was shipped to the Minerva Landfill in Ohio similar to all of the other building demolition debris.

#### Photographs

Attached to this memorandum are a series of photographs that document the location of the concrete sump chamber, sludge removal and demolition of the structure.

#### Attachments:

Figure 1 – Site Plan Photographs Bill of Lading – CR04 Waste Water Sump Sludge & PCB Excluded Waste w/asbestos Laboratory Report - *19L0326 Contest Final 12-13-19* 

## FIGURE 1



## **PHOTOGRAPHS**



Photo 2: Close-up of South Side of Elevated Platform – Concrete Sump Chamber is behind the clay tile block wall insert with the window at the top.





Photo 6: Top of Concrete Sump Chamber beneath the platform looking South. Note window opening visible from South.



## **BILL OF LADING**

Ple	ase type or p	rint	Straig	ght B	ill of L	.ading	9				
1.1		$\sim$	1. Generator EPA ID # (if applicable)	2. Pag	e 1 of 3. Eme	rgency Respon	ise #	4. Document	Tracking Number	r	
	EN	VIRO	CTP000033579	1	g	908-354-0210 ACV				061579	
No.	5. Generat	or Name and Mailing	g Address		Genera	tor's Site Addre	ss (if different)				
		UNITED ILLU			UNITE	D ILLUMIN	ATING				
		ORANGE, C	T 06477		510A G	RAND AV	ENUE(PAR	CELA, STAT	ION B)		
	Generator	Phone: 203	-926-4595			i *itaar (* V i i i)~¶		<b>V</b> 11			
	6. Transpo	rter 1 Company Nan	ne		US E	PA ID Number:	(if applicable)			· .	
	7 Transpo	ALLSTATE P	OWER VAC, INC.				NJD003812	047			
	7. manspo	ner 2 Company Nan	ne		US E	PA ID Number	(if applicable)				
	8. Designa	ted Facility Name ar	nd Mailing Address		US E	PA ID Number	(if applicable)	······································			
		TRADEBE TI 50 CROSS S BRIDGEPOR	REATMENT & REQUCYLING OF TREET RT, CT 06610	BRIDGEP	ORT	СТРІ	002593887				
tor	8. Designa	ted Facility Phone:	800-404-4409	,							
nera	9a.	(Proper o	9b. Material Description		10. Cont	ainers			12 Unit	13.	
Gei			hipping name required if DOT Hazardous Mater	rial)	No.	Туре	11. Tota	Quantity	(Wt/Vol)	Waste Codes	
		Non DOT, No None, None,	n RCRA Regulated Material None		XXI	T	0,0	623	G	CR04	
		2.									
								24 - A. 16 - R			
		3.									
		5									
	•										
		4.									
					1 1						
	14. Special	Handling Instruction	ns and Additional Information	33517 S	0 33899	SFSO#					
	41	Des Slad 100	8949600 M4460000 + + + + + + + + + + + + + + + + +								
	• • • • • • • • • • • • • • • • • • • •	Promet Int	0243026 WASTEWATER S	SUMP SLI	JDGE					÷.,	
		•	x								
	9										
	16. Genera packaged, i	tor/Offeror's Certific marked and labeled	ation: I hereby declare that the contents of this of placarded and are in all respects proper condition of the second se	consignment a	re fully and accura	tely described	above by the pro	per shipping nam	e and are classi	ified,	
	Printed Type	ed Name	1 ( ) Arapt	I Signat					A Month	Dave Marca	
	CAL	VINDUC	refer In (TRL WE		I. VI	1/000	1. (70	Agent	51 12	Z/ IQ	
	17. Transpo	rter 1 Acknowledgm	ent of Receipt of Materials	Signati	ire		- 4 0-	- 114	12	0///	
nter	Sala		1:00	5	7/		/		Month	Day Year	
odsu	18. Transpo	rter 2 Acknowledgm	ent of Receipt of Materials	Call	NOD &	Och	a da		12	5/19	
Trar	Printed/Type	ed Name		J	ile .				Month	Day Year	
									Nona	Day teat	
	19. Discrepa	ancy Indication Space	e (to be completed by Designated Facility)								
cility											
Fa	20. Discrepa	ancy Facility: Certific	ation of receipt of the materials covered by this	shipping pape	r except as noted i	in item 19					
	Printed/Type	eo Name		Signatu	re				Month	Day Year	
									1600		
400									1022		

P.	tase print or type and designed for use on elite (12	-pitch) typewriter.)							
	NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone 4. Waste Tracking Number #001017349REF					ED
	5. Generator's Name and Mailin	ng Address		Generator's Site Add	ress (if differen	t than mailing add	ress)	01104010	
	United Illuminatin 180 Marsh Hill R Generators Prone CT 0647	oad AD-1A 926-4595		United Illumi 510A Grand New Haven,	nating Co Avenue P CT 0651	ompany Parcel A, Sta 1	tion B		
	Delar non Tra	a as and				U.S. EPA ID	) Number		
	7. Transporter 2 Company Nam	le la					Mumber		
Minerva Enterprises, LLC 9000 Minerva Road									
	Facility's Phone: 330-1	44688 <del>366-3435</del>							
	9. Waste Shipping Name	and Description		10. Co No.	ntainers Type	11. Total Quantity	12. Unit Wt./Vol.		
ERATOR	<sup>1.</sup> NA2212, Asbe	estos, 9 , III, (PCB Excluded V	/aste w/Asbestos)	+	DT	20000	ĸ		
GEN	2.								
	3.								
	4.								
	13. Special Handling Instruction	s and Additional Information	t D20003 Sales Orde	r 2929 Job	19-103; \	Neight is ea	stimated	1	
	1)Profile#15060619E	ASBESTOS, EXCLUDED W	ASTE PCB >1<50 PP	M DOT ERG	#171				
	TR# 412	Lis# (PA) AG76441	Trailer	# 412A	List	(PA)XO	iR37	31	
	marked and labeled/placarde Generator's/Offeror's Printed/Typ	d, and are in all respects in proper condition f	contents of this consignment are fu or transport according to applicabl	e international and n	escribed above ational governi	by the proper shi mental regulations	pping name, s.	and are classified, pacl	kaged,
♥	Matt Plumik	in (TRI) As mage	t of U M	MAC &	eth			Month Day	Year 20
INL	Transporter Signature (for export	Import to U.S. s only):	Export from U.S.	Port of e	entry/exit:				
EB	16. Transporter Acknowledgment	of Receipt of Materials		Dale lea	wing 0.5.:				
POR	Transporter 1 Printed/Typed Nam		Signatu	re//				Month Day	Year
TRANS	Transporter 2 Printed/Typed Nam	D S MAY	Signatu	re				Month Day	<mark>≥∂</mark> Year
A	17. Discrepancy								
	17a. Discrepancy Indication Space	a Quantity	Туре	Residue		Partial Reje	ction	Full Reje	ction
	17b. Alternate Facility (or Generate	or)		Manifest Reference	Number:	U.S. EPA ID N	lumber		
FAC	Facility's Phone:					1			
INAIEL	17c. Signature of Alternate Facility	(or Generator)						Month Day	Year
								<u>I</u>	
	18. Designated Facility Owner or C	Operator: Certification of receipt of materials co	overed by the manifest except as r	noted in Item 17a					
	Printed/Typed Name		Signatur	6				Month Day	Year
G(	C Labels • Printed 1-800-997-69	in the USA DESIG	GNATED FACILITY TO (	GENERATOR		Reorder I	Part# N	IANIFEST-C6	NHWC
-							410-01	01.0000	