UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

FACT SHEET
Draft Hazardous and Solid Waste Amendments (HSWA) Permit
Tradebe Treatment and Recycling of Stoughton, LLC
EPA ID# MAD062179890
April 2025

This Fact Sheet is prepared pursuant to 40 CFR §124.8 for the draft permit developed by the U.S. Environmental Protection Agency (EPA) for Tradebe Treatment and Recycling of Stoughton, LLC (TTRS or the Permittee). TTRS is located at 441R Canton Street in Stoughton, Massachusetts.

If issued, this federal permit along with the current effective Hazardous Waste License #31B/2024 and any subsequent license from the Massachusetts Department of Environmental Protection (MassDEP) will cover all applicable requirements of the Resource Conservation and Recovery Act (RCRA) except for those requirements which become effective by statute, or those requirements that are not included in the permit and are later promulgated under 40 CFR Part 268 restricting placement of hazardous waste in or on the land; are later promulgated under 40 CFR Part 264 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units, as specified in 40 CFR §270.4; or are later promulgated under Subparts AA, BB, or CC of 40 CFR Part 265 limiting air emissions. Together, these permits constitute a complete RCRA Hazardous Waste Permit for this facility (i.e., the RCRA Permit).

A. RCRA PERMIT PROCESS/STRUCTURE

The purpose of the permitting process is to establish specific requirements tailored to the facility, as well as to afford EPA and interested citizens the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements promulgated under the Resource Conservation and Recovery Act (RCRA), as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA). EPA administers the statutory requirements of HSWA for which the Commonwealth of Massachusetts is not authorized. The other sections of this fact sheet will identify the federal portion of the RCRA Permit as the "HSWA Permit (Part II)". The remaining portion of the TTRS RCRA Permit, which is administered by the MassDEP, will be identified as the "Hazardous Waste License".

B. HSWA PERMIT STRUCTURE

SEMS Doc ID 689721

The HSWA Permit (Part II) is divided into three (3) sections: a cover page setting forth the basic legal authority for issuing the permit; a section on standard conditions applicable to all hazardous waste management facilities; and a section on facility specific conditions addressing the organic emission standards for the facility.

C. FACILITY DESCRIPTION

TTRS is a hazardous waste management facility authorized by the MassDEP to conduct the storage and treatment of hazardous waste in tanks and containers in accordance with its current effective Hazardous Waste License (license #31B/2024, effective September 30, 2024 or subsequent hazardous waste license). The maximum licensed storage capacity is 216, 900 gallons for the tanks and containers. A complete description of the facility and the authorized waste management activities are described more fully in the current effective state license. Information on the state license can be obtained by contacting the MassDEP Bureau of Air and Waste, 100 Cambridge Street Suite 900, Boston, MA 02114.

D. HSWA PERMIT CONDITIONS

1. Cover Page: The Cover Page cites the authority for the issuance of the HSWA Permit and establishes the term of the permit.

2. Standard Permit Conditions: Section I of the permit sets forth standard administrative conditions applicable to all hazardous waste management facilities. Unless otherwise specified, all citations refer to the regulations as codified in Title 40 of the Code of Regulations (40 CFR).

3. Facility-Specific Conditions: Section II of the permit sets forth the specific conditions for this facility with which the Permittee must comply and are explained as follows:

   The Organic Air Emissions Standards of 40 CFR Part 264 Subparts AA, BB and CC apply to the TTRS facility. In particular, the conditions of Subpart AA apply to the Vapor Recovery System (VRS), specifically the Closed Vent System (CVS) piping off Tanks 1-11, the two carbon absorption units, and equipment associated with the CVS at TTRS and are specified in Section II.E. of the HSWA permit. The conditions of Subpart BB apply to the equipment associated with Table 2 of Appendix A of the HSWA permit as specified in Section II.F. of the HSWA permit. Subpart CC applies to Tanks 1-11 and the Drum Storage as specified in Table 4 of Appendix A of the HSWA permit and identified in the state permit. The specific requirements for units subject to Subpart CC are found in Sections II.C. and II.D. of the HSWA Permit.

E. PROCEDURES

The regulations under 40 CFR §124.10 require that a 45-day comment period be instituted for each draft permit under the Resource Conservation and Recovery Act. The comment period will begin on April 18, 2025, which is the date of publication of the

public notice in a major local newspaper of general circulation and will end on June 2, 2025. The public notice will also be broadcast over a local radio station.

A public hearing will be held only if the EPA determines that there is significant public interest in this Permit or if the EPA receives a written notice of opposition to the Permit along with a request for a public hearing in accordance with 40 CFR §124.12(c)(3).

The draft federal RCRA permit, posted in the administrative record as SEMS DocID 01-689719, and fact sheet may be viewed and copied on the EPA Region 1 website at https://www.epa.gov/publicnotices/actions-open-public-comment-epa-new-england. The administrative record direct link is https://semspub.epa.gov/src/collection/01/AR67885. Persons wishing to request a public hearing or to comment on the proposed HSWA permit must submit such requests or comments in writing in accordance with the requirements of 40 CFR §124.11. Comments must be e-mailed to Sara Kinslow or Anna Knutson, RCRA Waste Management and Lead Branch, Land, Chemicals, and Redevelopment Division at: Kinslow.Sara@epa.gov and Knutson.Anna@epa.gov. All comments must be received no later than midnight, June 2, 2025.

When EPA makes a final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review of the permit decision is requested under 40 CFR §124.19. If no comments were received requesting a change in the draft permit, the final permit shall become effective immediately upon issuance.

F. CONTACT PERSON

Sara Kinslow or Anna Knutson, RCRA Waste Management and Lead Branch, Land, Chemicals, and Redevelopment Division, (Mail Code: LCRD07-5), EPA Region 1, 5 Post Office Square, Suite 100, Boston, MA 02109-3912; telephone numbers: Sara Kinslow: (617) 918-1294 and Anna Knutson: (617) 918-1139; e-mail addresses: Kinslow.Sara@epa.gov and Knutson.Anna@epa.gov.