

FACT SHEET
TRADEBE TREATMENT AND RECYCLING NORTHEAST, LLC
COMMERCIAL RCRA¹ HAZARDOUS WASTES, CONNECTICUT 22a-454 WASTES
AND USED OIL FACILITY PERMIT RENEWAL
EPA ID No. CTD021816889

- (A) **FACILITY:** Tradebe Treatment and Recycling Northeast, LLC
136 Gracey Avenue, Meriden, Connecticut 06451
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- (B) **FACILITY TYPE.** Tradebe Treatment and Recycling LLC (hereinafter, “the Permittee” or “TTRNE”) seeks authorization to continue the transfer, storage, treatment, recycling and management of wastes accepted from off-site locations as well as wastes generated from on-site activities. Such wastes are identified as (1) listed and exhibits the characteristics of hazardous wastes under the Resource Conservation and Recovery Act (RCRA) in accordance with Connecticut’s Hazardous Waste Management Regulations, Section 22a-449(c)-104; (2) Universal Wastes in accordance with Connecticut’s Hazardous Waste Management Regulations, Section 22a-449(c)-113; (3) Used Oil in accordance with Connecticut’s Hazardous Waste Management Regulations, Section 22a-449(c)-119, and (4) Non-RCRA hazardous wastes (hereinafter “Non-RCRA Wastes”). In addition, TTRNE transports specification and off-specification used oils, hazardous waste fuels, and solid and liquid hazardous wastes off-site for reuse, further treatment, and/or disposal at a permitted or an approved disposal facility. TTRNE typical operating hours for receipt of wastes are from 7:00 am to 7:00 pm, Monday through Friday, Saturday and Sunday hours as needed. The activities are located at 136 Gracey Avenue, Meriden, Connecticut.
- (C) **WASTE MANAGEMENT AREAS/UNITS.** The facility is designed to manage on-site the following maximum volumetric quantities of wastes:
- (a) **Hazardous Wastes:**
- (1) 5,500 (100-55 gallons or equivalent) gallons of hazardous wastes in the container storage areas.

¹ Note: RCRA means the Resource Conservation and Recovery Act (RCRA). RCRA is a federal law that focuses on the recovery and recycling of wastes. It defines what wastes are hazardous, requires generators of hazardous waste to track the transportation of the waste from point of generation to its final disposal; operate treatment and disposal facilities in accordance with established standards; and manage hazardous waste properly.



- (2) 70,000 gallons of hazardous wastes in RCRA tanks (storage and treatment).

(b) Non-RCRA Hazardous Wastes:

- (1) 5,500 gallons of Non-RCRA hazardous wastes in the container storage area, and four (4) 30 cubic yard roll-offs or 120 cubic yards of non-RCRA wastes in roll-offs or equivalent.
- (2) 50,000 gallons of non-RCRA wastes in tanks (storage and treatment).

All wastes are stored and shipped in containers or vehicles that have been approved by the U.S. Department of Transportation, for such use, to a permitted or approved disposal facility. No disposal activities occur at the 136 Gracey Avenue site.

The waste management areas are: (1) Container Storage Areas; (2) Loading and Unloading Areas; (3) Tank Farm Area (Storage and Treatment); (4) Degrit System Area; (5) Truck-to-Truck Transfer Area (TTTA); (6) 72-Hours Truck Parking Areas; and (7) Homeowner Waste Oil Drop-Off Area.

- (1) Container Storage Areas. These areas are utilized to store hazardous and non-RCRA hazardous wastes received from off-site or generated on-site that either need further processing or are bound for off-site shipment and disposal.

For purposes of determining compliance with the volume capacity limit, each container in these areas shall be assumed full.

- (2) Loading and Unloading Areas. These areas are utilized to unload and load bulk and non-bulk permitted wastes that are either generated onsite or brought to the permitted facility from off-site locations.
- (3) Tank Farm Area (Storage and Treatment). This area is utilized for the storage and treatment of RCRA and Non-RCRA hazardous wastes in twelve (12) above ground tanks. The total permitted capacity in tanks is 120,000 gallons of RCRA and non-RCRA wastes.
- (4) Trailer Staging Area (Truck-to-Truck Transfer area). This area is utilized to consolidate shipments of hazardous and non-hazardous wastes, a maximum of four (4) trailer trucks are allowed at any one time. The Trailer Storage Area volumetric capacity shall not exceed 19,360 gallons equivalent to each trailer shall not exceed 4,860 gallons or eighty-eight (88) 55-gallon capacity containers or equivalent.
- (5) Degrit System Area. This area is utilized for (a) receiving and temporarily holding incoming RCRA hazardous and non-RCRA hazardous bulk waste liquids to facilitate debris and grit removal; (b) separating RCRA hazardous and non-RCRA hazardous solid and semi-solid materials by means of a screen and conveyance system and depositing them into open-top fifty-five (55) gallon containers; and (c) transferring RCRA hazardous and non-RCRA hazardous liquids from the Degrit

System to the Tank Farm Area for subsequent storage and/or treatment. The Degrit System volume capacity is 3,465 gallons divided into 3-1,100 gallons sections and 3-55 gallons containers collecting solids and/or sludges.

- (6) 72-Hour Truck Parking Areas. These areas are utilized to park any transport vehicle containing wastes for the parking duration of seventy-two (72) hours. Such vehicles will comply with the Regulations of Connecticut State Agencies (RCSA) Section 22a-449(c)-11 and RCSA Section 22a-449(c)-103 with respect to the transportation of hazardous wastes.
 - (7) Homeowner Waste Oil Drop-Off Area (HOWOD). This area is utilized for the purpose of receiving, staging, storing household waste oil or other materials that may be dropped off (A sign will be posted at the site that reads: "ONLY WASTE OIL IS ACCEPTED NO OTHER MATERIAL").
- (D) PERMITTED WASTES. The following wastes may be stored and managed at TTRNE facility.
- (1) The following hazardous wastes Codes identified by the waste codes in 40 CFR Part 261, Subparts C and D:
 - (a) D-Wastes. Characteristic waste that is ignitable, corrosive or toxic. The waste codes are the following:

D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043
 - (b) F-Wastes. Hazardous waste from non-specific sources. The waste codes are the following:

F001, F002, F003, F004, F005, F006, F037, F038
 - (c) U-Wastes. Toxic hazardous wastes, which are commercial chemical products, including discarded products, off-specification products, container residues and spill residues. The waste codes are the following:

U002, U019, U031, U037, U052, U057, U072, U080, U112, U117, U121, U140, U154, U159, U161, U171, U196, U210, U211, U220, U226, U227, U228, U239, U359
 - (2) Non-RCRA hazardous (Connecticut Regulated Wastes) as defined under the Connecticut General Statutes Section 22a-448. These wastes are;
 - (a) Waste PCBs, waste code CR01. Any waste material containing or contaminated by polychlorinated biphenyls (PCBs) at concentrations that are

greater or equal to fifty (50) part per million (ppm). These include, but are not limited to, PCB oils, items and equipment. These wastes are managed only at the Truck-to-Truck Transfer Area as a truck-to-truck transfer waste, not to be stored at the Facility.

- (b) Waste Oil (CR02). Any oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or loss of original properties and is not miscible in water. These include but are not limited to, crude oil, fuel oil, lubricating oil, kerosene, diesel fuel, motor oil, non-halogenated oil, and oils that are recovered from oil separators, oil spills or tank bottoms;
 - (c) Waste Water Soluble Oil (CR03). Any oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or loss of original properties, and is miscible in water. These include, but are not limited to, cutting oil emulsions or coolants.
 - (d) Waste Chemical Liquids (CR04). Any wastes that are liquid free flowing and/or contains free draining liquid 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, sludge wastes, antifreeze wastes and glycol solutions. Certain CR04 wastes are not allowed in the wastewater treatment system per the wastewater discharge permit; and
 - (e) Waste Chemical Solids (CR05). Any chemical solids or semi-solids from a commercial, industrial, agricultural, or community activity. These wastes include, but are not limited to grinding dusts, tumbling sludges, scrap plastic and rubber flash, and other ground or chipped waste solid.
- (3) The storage of Universal waste in accordance with Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-113. These wastes are batteries, thermostats, mercury-containing equipment, lamps, used electronics and pesticides.
 - (4) The storage and treatment of Used Oil in accordance with the Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-119.
 - (5) Other Materials (e.g., commercial chemicals from technical, analytical reagent, grade chemicals, chemical intermediates, products, non-hazardous wastes and any chemical mixture), except where otherwise prohibited by this Permit (e.g., shock sensitive materials) may be treated, stored, processed and managed in the Management Areas.
 - (6) Lab Packed Wastes. Include expired or spent materials, unused products or materials, and laboratory wastes in small quantities (less than five (5) gallons or less than thirty (30) pounds). The lab packed wastes shall be those waste codes permitted for the facility.

(E) **SPECIFIC HAZARDOUS WASTE PROHIBITIONS.** TTRNE is prohibited from storing, treating or managing the following wastes types in the hazardous Waste Management Areas:

- (1) Explosive materials, as defined in 49 CFR 173 (DOT Class 1);
- (2) Compressed gases, as defined in 49 CFR 173.115, except for containers which contain aerosol cans of 32 ounces or less and non-flammable compressed gases;
- (3) Any forbidden hazardous material identified in 49 CFR 173.21 and 173.5;
- (4) Materials that are poison by inhalation, as defined in 49 CFR 173.115, 173.132 and/or 173.133;
- (5) Infectious materials, as defined in 49 CFR 173.134 (DOT Class 6, Division 6.2); except for those generated onsite through first aid and other medical needs;
- (6) Cryogenic Liquids, as defined in 49 CFR 173.115(g);
- (7) Materials that are pyrophoric or ignite spontaneously;
- (8) Listed and Characteristic wastes with a Health Hazard rating of 4, as defined in the National Fire Protection Association ("NFPA") 704, "Standard Systems for the Identification of the Fire Hazards of Materials", most recent edition;
- (9) Wastes that exhibit the characteristics of reactivity as defined by 40 CFR 261.23 (Hazardous wastes with EPA waste number of D003);
- (10) Shock sensitive materials, defined as materials that are readily capable of detonation or explosive decomposition or reaction at normal temperatures and pressures, and materials sensitive to mechanical or localized thermal shock at normal temperatures and pressures, including materials designated by the NFPA 704 as having a Reactivity Hazard Rating of 4 (See NFPA 704 most recent edition);
- (11) Spontaneously Combustible Materials, as defined in 49 CFR 173.124(b) (Class 4, Division 4.2);
- (12) Dangerous When Wet Materials, as defined in 49 CFR 173.24(c) (Class 4, Division 4.3);
- (13) Material containing polychlorinated biphenyls (PCBs) at concentrations that are greater or equal to fifty (≥ 50) parts per million (ppm), except for truck-to-truck container transfer Storage Area (not to be stored at the Facility); and
- (14) Radioactive materials, as defined in 49 CFR 173.403 (DOT Class 7);

The Specific Prohibitions included in the Permit do not apply to the product, materials used by the Permittee in its laboratory or for maintenance at its property, provided such products, or materials are present in quantities no greater than that necessary for use by the Permittee.

(F) **RATIONALE FOR THE PROHIBITION OF HAZARDOUS WASTES.** In determining which prohibitions to apply, the DEEP utilized the demonstration provided in the permit application for the facility to properly manage each of the DOT and NFPA hazard classifications for such hazardous waste storage and management unit(s).

(G) **PERMIT BASIS.** The conditions of this renewal permit are based upon the Regulations of the Connecticut State Agencies adopted pursuant to Section 22a-449(c) of the Connecticut General Statutes, and upon the provisions of Section 22a-6 and 22a-454 of

the Connecticut General Statutes, as applicable. The Connecticut Hazardous Wastes Management Regulations have incorporated by reference the Federal (RCRA) Hazardous Waste Regulations. These Federal Regulations include the technical and administrative standards for hazardous waste facilities as identified by 40 CFR Parts 124, 264, 268 and 270, as modified by 22a-449(c)-104(a)(2) and 22a-449(c)-110(a)(2).

- (H) PERMIT DURATION. This permit will be in effect for five (5) years unless revoked and reissued or terminated under 40 CFR 270.41 and 270.43 or continued in accordance with 40 CFR 270.51(a).
- (I) AVAILABLE MATERIALS. Materials available for inspection with respect to this Draft Permit include:
- (1) The RCRA Part B and Connecticut 22a-454 Permit Renewal Application;
 - (2) The Commercial Draft RCRA Part B Hazardous Waste, Connecticut 22a-454 Wastes and Used Oil Facility Renewal Permit;
 - (3) The Notice of Tentative Determination for the Draft Facility Renewal Permit;
 - (4) The Fact Sheet; and
 - (5) The Administrative Records of the Permit Application reviews, approval, and supporting documents.

The above items listed as (1) through (5) normally would be available for inspection at the DEEP, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, 79 Elm Street, Hartford, CT 06106-5127, Monday through Friday, and other times by appointment; however, due to the current situation with COVID-19, the building is closed. These documents will become available to the Public when DEEP reopens.

Due to COVID-19, the Commercial Draft RCRA Part B Hazardous Waste Renewal Permit, Connecticut 22a-454 Wastes, and Used Oil Facility Renewal Permit and supporting documentation are being made available for inspection at the following URL Link: <https://go.usa.gov/xArfr>

Questions regarding this Commercial RCRA Draft Part B Hazardous Waste, Connecticut 22a-454 Wastes and Used Oil Facility Renewal Permit may be directed to Carmen Holzman, of the Hazardous Waste Permit Program, Permit Writer, Waste Engineering and Enforcement Division, Bureau of Materials Management and Compliance Assurance, CT DEEP, telephone number (860) 424-3569 or email carmen.holzman@ct.gov.