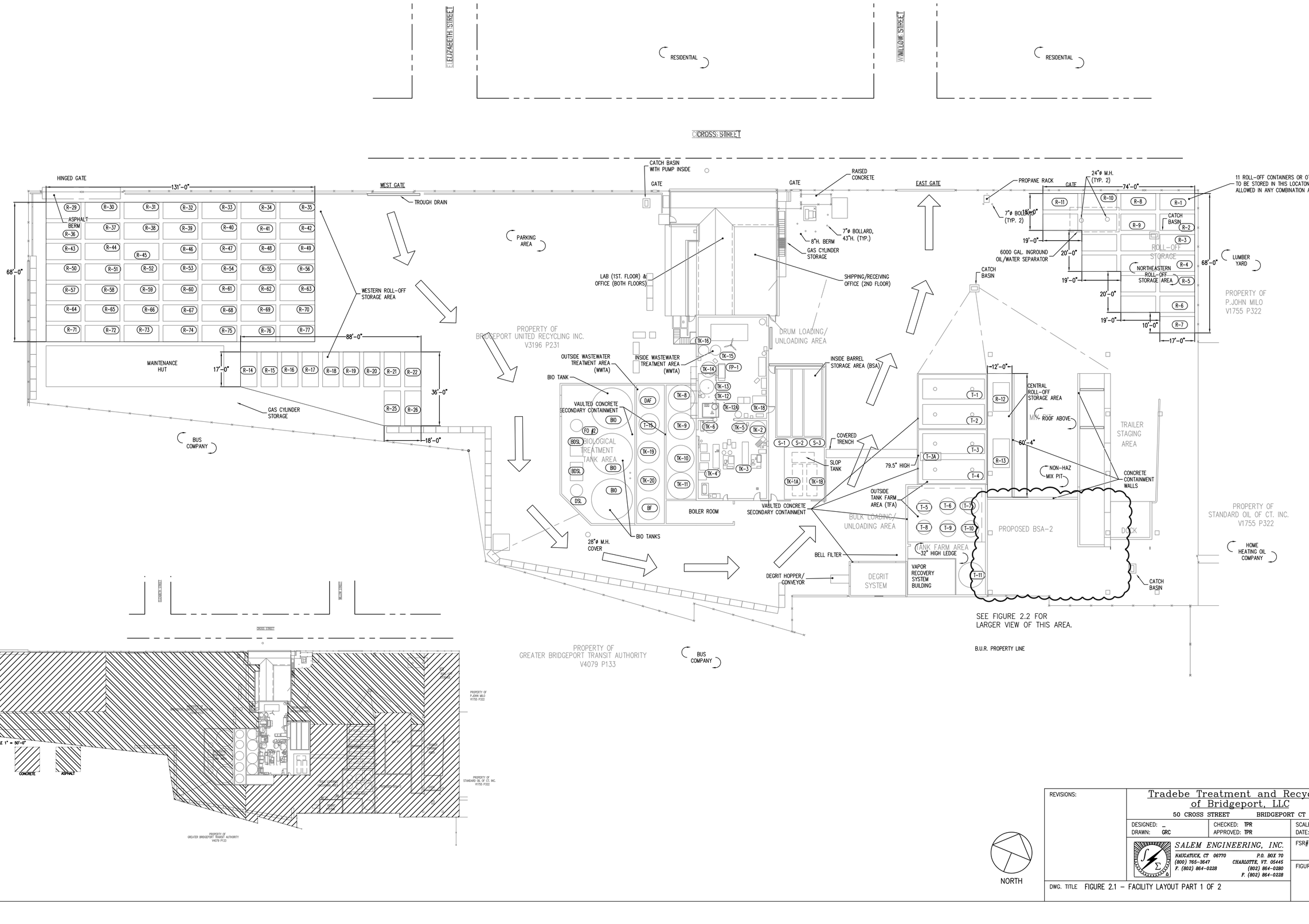

NORTH

REVISIONS:

Tradebe Treatment and Recycling of Bridgeport, LLC

50 CROSS STREET BRIDGEPORT CT

DESIGNED: _
DRAWN: GRC
CHECKED: TPR
APPROVED: TPR
SCALE: 1" = 20'-0"
DATE: 2016.MARCH.31

SALEM ENGINEERING, INC.
NAUGATUCK, CT 06770
(800) 765-3647
F. (802) 864-0228
P.O. BOX 70
CHARLOTTE, VT. 05445
(802) 864-0280
F. (802) 864-0228

FSR#: 216XXX

FIGURE: 2.1

DWG. TITLE FIGURE 2.1 – FACILITY LAYOUT PART 1 OF 2

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PRETREATMENT PERMIT

issued to

Bridgeport United Recycling, Inc.
50 Cross Street
Bridgeport, CT 06610

Location Address:
50 Cross Street
Bridgeport, CT 06610

Facility ID: 015-009 **Permit ID:** SP0000101 **Permit Expires:** March 14, 2016

SECTION 1: GENERAL PROVISIONS

(A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement (MOA) dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.

(B) Bridgeport United Recycling, Inc., ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsection (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

(a) Definitions
(b) General
(c) Inspection and Entry
(d) Effect of a Permit
(e) Duty
(f) Proper Operation and Maintenance
(g) Sludge Disposal
(h) Duty to Mitigate
(i) Facility Modifications; Notification
(j) Monitoring, Records and Reporting Requirements
(k) Bypass
(l) Conditions Applicable to POTWs
(m) Effluent Limitation Violations (Upsets)
(n) Enforcement
(o) Resource Conservation
(p) Spill Prevention and Control
(q) Instrumentation, Alarms, Flow Recorders
(r) Equalization

Section 22a-430-4 Procedures and Criteria

(a) Duty to Apply
(b) Duty to Reapply
(c) Application Requirements
(d) Preliminary Review
(e) Tentative Determination
(f) Draft Permits, Fact Sheets
(g) Public Notice, Notice of Hearing
(h) Public Comments
(i) Final Determination
(j) Public Hearings
(k) Submission of Plans and Specifications. Approval.
(l) Establishing Effluent Limitations and Conditions

(m) Case by Case Determinations
(n) Permit issuance or renewal
(o) Permit Transfer
(p) Permit revocation, denial or modification
(q) Variances
(r) Secondary Treatment Requirements
(s) Treatment Requirements for Metals and Cyanide
(t) Discharges to POTWs - Prohibitions

(C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars may be assessed per violation per day.

(D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.

(E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least 30 days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.

(F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.

(G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the Regulations of Connecticut State Agencies.

(H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the Connecticut General Statutes).

SECTION 2: DEFINITIONS

(A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and section 22a-430-3(a) and 22a-430-6 of the RCSA.

(B) In addition to the above the following definitions shall apply to this permit:

"-----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the DMR.

"Annual" in the context of a sampling frequency, means sampling is required in the month of January.

"Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l); otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

"Daily Quantity" means the quantity of waste generated during an operating day.

"Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l); otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"NA" as a Monitoring Table abbreviation means "not applicable".

"NR" as a Monitoring Table abbreviation means "not required".

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum of all values recorded

as a result of analyzing each grab sample of; 1) a Composite Sample, or 2) a Grab Sample Average. For those permittees with continuous monitoring and recording pH meters, Range During Sampling shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"Range During Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Twice per Month" when used as a sample frequency shall mean two samples per calendar month collected no less than 12 days apart.

"Quarterly" in the context of a sampling frequency, means sampling is required in the months of January, April, July and October.

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S DECISION

(A) The Commissioner has made a final determination and found that the modification of the existing system or installation of a new system will protect the waters of the state from pollution. The Commissioner's decision is based on Application No. 199702346 for permit reissuance received on August 1, 1997 and the administrative record established in the processing of that application.

(B) The Commissioner hereby authorizes the Permittee to discharge in accordance with the provisions of this permit, the above referenced application, and all approvals issued by the Commissioner or the Commissioner's authorized agent for the discharges and/or activities authorized by, or associated with, this permit.

(C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the Connecticut General Statutes or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or Connecticut General Statutes or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(A) The discharge shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A

Discharge Serial Number: 001-1 | **Monitoring Location:** 1

Wastewater Description: Centralized waste treatment facility consisting of the following treated wastewaters: Fuel oil & water mixtures, used oil contaminated waters, water contaminated with gasoline, water generated from hazardous waste fuel treatment, water generated from emulsion cracking process, industrial wash water, stormwater from petroleum or chemical containment areas, dilute latex water, oil contaminated with septic wastewater, contact water from oil containing trace polychlorinated biphenyls (less than 50.0 mg/l), onsite tank cleaning, containment area cleaning water, truck washing wastewater, laboratory wastewater, stormwater collected within the tank containment areas, off-loading area, solid waste mixing pit and oil filter recycling areas, and boiler blowdown wastewater

Monitoring Location Description: At the composite and grab sampling ports after the pH meter

Discharge is to: The City of Bridgeport East Side Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency [2]	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency	Sample Type or measurement to be reported	Minimum Level Test[3]
Antimony, Total	mg/l	0.206	0.249	Weekly	Daily Composite	0.374	NR	NA	
Arsenic, Total	mg/l	0.104	0.162	Monthly	Daily Composite	0.243	NR	NA	*
Barium, Total	mg/l	NA	-----	Monthly	Daily Composite	NA	NR	NA	*
Cadmium, Total	mg/l	0.0962	0.474	Weekly	Daily Composite	0.711	NR	NA	
Chromium, Total	mg/l	0.487	0.947	Weekly	Daily Composite	1.421	NR	NA	
Cobalt, Total	mg/l	0.124	0.192	Weekly	Daily Composite	0.288	NR	NA	
Copper, Total	mg/l	0.301	0.405	Weekly	Daily Composite	0.608	NR	NA	
Flow Rate, (Average Daily)[1]	gpd	57,000	NA	Daily	Daily Total Flow	NA	NR	NA	
Flow, Maximum during 24-hour period[1]	gpd	NA	65,000	Daily	Daily Total Flow	NA	NR	NA	
Flow, (Total-Day of Sampling)	gpd	NA	65,000	Weekly	Daily Total Flow	NA	NR	NA	
Lead, Total	mg/l	0.1	0.222	Weekly	Daily Composite	0.333	NR	NA	
Mercury, Total	mg/l	0.000739	0.00234	Monthly	Daily Composite	0.00351	NR	NA	*
Molybdenum, Total	mg/l	NA	-----	Annual	Daily Composite	NA	NR	NA	
Methyl-tert-butyl-ether (MTBE) (EPA Test Method 624) Section 5(E) below	mg/l	NA	NA	NR	NA	1.0	Weekly	Grab	
Nickel, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	NA	
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 - 10.0	Weekly	Instantaneous	
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous	
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous	
Phenols,Total	mg/l	NA	NA	NR	NA	15.0	Weekly	Grab	
Selenium, Total	mg/l	NA	-----	Annual	Daily Composite	NA	NR	NA	*
Silver, Total	mg/l	0.0351	0.120	Weekly	Daily Composite	0.18	NR	NA	

Tin, Total	mg/l	0.120	0.409	Weekly	Daily Composite	0.614	NR	NA	
Titanium, Total	mg/l	0.0618	0.0947	Weekly	Daily Composite	0.142	NR	NA	
Vanadium, Total	mg/l	0.0662	0.218	Weekly	Daily Composite	0.327	NR	NA	
Bis(2-ethylhexyl) phthalate	mg/l	0.158	0.267	NR	NA	0.401	Weekly	Grab	
Carbazole	mg/l	0.233	0.392	NR	NA	0.588	Weekly	Grab	
o-Cresol	mg/l	0.561	1.92	NR	NA	2.88	Weekly	Grab	
p-Cresol	mg/l	0.205	0.698	NR	NA	1.047	Weekly	Grab	
n-Decane	mg/l	3.31	5.79	NR	NA	8.685	Weekly	Grab	
Fluoranthene	mg/l	0.393	0.787	NR	NA	1.181	Weekly	Grab	
n-Octadecane	mg/l	0.925	1.22	NR	NA	1.83	Weekly	Grab	
2,4,6-Trichlorophenol	mg/l	0.106	0.155	NR	NA	0.233	Weekly	Grab	
Ethylene Glycol	mg/l	NA	NA	NR	NA	-----	Monthly	Grab	
Total Suspended Solids	mg/l	------	170.0	Weekly	Daily Composite	255.0	NR	NA	
Oil Petroleum, Total Recoverable	mg/l	50.0	100.0	Weekly	Grab Sample Average	100.0	NR	NA	
Polychlorinated Biphenyls(PCBs) See Section 4 Paragraphs (E), (F), Section 5 Paragraph (C) and the remark below	ug/l	NA	NA	NR	NA	0.10	Weekly	Grab	*
Total Volatile Organics plus xylenes (EPA Test Methods 624) See Section 5 Paragraph (D) below (Volatile fraction organics (EPA 624))	mg/l	NA	NA	NR	NA	-----	Weekly	Grab	
Total Semi-Volatile Organics (EPA Test Methods 625) Section 5 Paragraph (D) below (Base neutrals & acid (Method 625), total)	mg/l	NA	NA	NR	NA	-----	Weekly	Grab	
Biochemical Oxygen Demand (BOD) -5 Day	mg/l	------	------	Weekly	Daily Composite	NA	NR	NA	
Biochemical Oxygen Demand-5 Day [Effective upon permit issuance until February 28, 2011]	lb/day	------	1,500	Weekly	Daily Composite	NA	NR	NA	
Biochemical Oxygen Demand-5 Day [Effective from March 1, 2011 until April 30, 2011]	lb/day	------	1,125.0	Weekly	Daily Composite	NA	NR	NA	
Biochemical Oxygen Demand, 5-Day [Effective from May 1, 2011 until June 30, 2011] See Section 7 below	lb/day	------	750.0	Weekly	Daily Composite	NA	NR	NA	

Biochemical Oxygen Demand, 5-Day [Effective from July 1, 2011 until permit expiration date] See Section 7 below	lb/day	-------	500.0	Weekly	Daily Composite	NA	NR	NA	
Chemical Oxygen Demand (COD)	mg/l	------	------	Weekly	Daily Composite	NA	NR	NA	
Zinc	mg/l	0.641	2.0	Weekly	Daily Composite	3.0	NR	NA	
Ammonia as Nitrogen	mg/l	NA	-----	Monthly	Daily Composite	NA	NR	NA	
Phosphorus, Total	mg/l	NA	-----	Monthly	Daily Composite	-----	NR	NA	

Table Footnotes and Remarks:

Footnotes:

[1] For this parameter the permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily for each month.

[2] The first entry in this column is the 'Sampling Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample frequency' is specified as monthly, or less frequent, then the "Reporting Frequency' is the same as the 'Sample Frequency'.

[3] Minimum Level Test refers to Section 5 Paragraph (J) of this permit.

Remarks:

1) DSN 001 shall be sampled and analyzed for Polychlorinated Biphenyls (PCBs) whenever PCB bearing wastewater is being treated. DSN 001 shall be sampled and analyzed for PCBs at least weekly, regardless of whether or not PCB bearing wastewater has been treated during the week.

(B) All samples shall be comprised of only those wastewaters described in this schedule; therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.

(C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by, the Department of Environmental Protection personnel, the Permittee, or other parties.

(D) The limits imposed on the discharges listed in this permit take effect on the issuance date of this permit, hence any sample taken after this date which, upon analysis, shows an exceedance of permit limits will be considered non-compliance.

The monitoring requirements of this permit begin on the date of issuance of this permit if the issuance date is on or before the 12th day of a month. For permits issued on or after the 13th day of a month, monitoring requirements begin the 1st day of the following month.

(E) All incoming waste oil shipments and oil/water mixture waste streams shall be sampled and analyzed for aroclor and non-aroclor polychlorinated biphenyls (PCBs) using EPA Method 8082. All PCB contaminated waste streams shall be treated and disposed of in accordance with the requirements of 40 CFR Part 761 and any applicable regulation of the Connecticut State Agencies. For those PCB contaminated waste streams which, consistent with the above requirements, may be treated and discharged on-site, the total untreated concentration of PCB in the oil portion shall not be equal or greater than 50 mg/l, and the total untreated concentration of PCBs in the water portion shall not be equal to or greater than 2.0 mg/l.

(F) A written record shall remain on-site and shall include copies of PCB analysis for all incoming waste shipments where testing of untreated waste material, as required by the Bureau Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division of this Department, shows PCB concentrations above 2 mg/l.

(G) This permit does not authorize the Permittee to treat any hazardous wastes not expressly provided for in a Hazardous Waste Facility Permit issued pursuant to Section 22a-449(c)110 of the Connecticut Hazardous Waste Management Regulations.

(H) The Permittee is required to train and maintain certified biological wastewater treatment operator(s) in accordance with Section 22a-416-1 through 10 of the RCSA to operate the wastewater treatment facility during wastewater discharge.

SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

(A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall employ methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4.

(B) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR136 unless otherwise specified.

(C) The analytical method used to determine the concentration of Polychlorinated Biphenyls (PCBs) shall be EPA Method 608.

(D) The analytical method to be used to determine the concentration for the total volatile and semi volatile organics parameter specified in Table A of Section 4 shall be EPA Test Methods 624 plus xylenes, and 625. The Permittee shall submit to the Commissioner with the DMR, quarterly, the total volatile verification analyses for 5 tentatively identified compounds (TICs), and 10 TICs for semi-volatiles.

(E) The analytical method to be used to determine the concentration for the MTBE parameter specified in Table A of Section 4 shall be the EPA Test Method 624.

(F) The analytical method used to determine the concentration of Ethylene Glycol shall be gas chromatography, direct injection with a flame ionization detector.

(G) The results of chemical analysis required above shall be entered on the Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance at the following address. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at this address by the last day of the month following the month in which samples are taken.

Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division (Attn: DMR Processing)
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

(H) If this permit requires monitoring of a discharge on a calendar basis (e.g. Monthly, quarterly, etc.) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.

(I) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority) ("WPCA") involved in the treatment and collection of the permitted discharge.

(J) The Minimum Levels specified below represent the concentrations at which quantification must be achieved and verified during the chemical analyses for the parameters identified in Section 4 Table (A). Analyses for these parameters must include check standards within ten percent of the specified Minimum Level or calibration points equal to or less than the specified Minimum Level.

Parameter	Minimum Level
Arsenic, Total	5.0 ug/l
Barium, Total	1.0 mg/l
Mercury, Total	0.2 ug/l
Polychlorinated Biphenyls (PCBs)	0.1 ug/l
Selenium, Total	5.0 ug/l

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

(A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing) within 30 days of the exceedance.

(B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("POTW"), including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.

(C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Bureau of Materials Management and Compliance Assurance within 24 hours of becoming aware of the violation.

SECTION 7: COMPLIANCE SCHEDULE

(A) The Permittee shall achieve compliance with the BOD effluent limitations in Section 4, Table A and this section.

(1) On or before 30 days after the installation of the approved mixed bed bioreactor (MBBR) system, the Permittee shall submit the as-built final plans and specifications to the Department.

(2) On or before 30 days after the installation of the approved MBBR system, the Permittee shall submit a written certification to the Department that the treatment system is installed and operational in accordance with the as-built plans and specifications submitted to the Department.

(B) The Permittee shall use best efforts to submit to the Commissioner all documents required by this section of the permit in a complete and approvable form. If the Commissioner notifies the Permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the Permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty days of the Commissioner's notice of deficiencies. In approving any document or other action under this Compliance Schedule, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this section of the permit. Nothing in this paragraph shall excuse noncompliance or delay.

(C) Dates. The date of submission to the Commissioner of any document required by this section of the permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" as used in this section of the permit means calendar day. Any document or action which is required by this section of the permit to be submitted, or performed, by a date which falls on, Saturday, Sunday, or a Connecticut or federal holiday, shall be submitted or performed on or before the next day which is not a Saturday, Sunday, or Connecticut or federal holiday.

(D) Notice to Commissioner of changes. Within fifteen days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this section of the permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the correct or omitted information to the Commissioner.

(E) Submission of documents. Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit shall, unless otherwise specified in writing by the Commissioner, be directed to:

Charles Nezianya
Department of Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

SECTION 8: COMPLIANCE CONDITIONS

The Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six percent or more of all measurements taken during a six-month period exceed the Average Monthly or Maximum Daily Limit(s) for the same pollutant parameter.
- **Technical Review Criteria violations:** Those in which 33% or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the average or maximum daily limits multiplied by (1.4 for BOD, TSS, oil and grease) or (1.2 for all other pollutants except pH).
- **Compliance Schedule:** Failure to meet within 90 days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.

- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.

- **Imminent Endangerment:** Any discharge of pollutant(s) that has caused imminent endangerment to human health, welfare or to the environment.

This permit is hereby issued on March 15, 2011.

for Daniel C. Esty
Acting Commissioner

DCE/cn

cc: The City of Bridgeport East Side Water Pollution Control Facility

From: Hamilton, Emily
To: Steve Dubauskas
Subject: Stormwater Industrial Permit Renewal
Date: Tuesday, July 26, 2016 12:03:31 PM
Attachments: image002.png
image003.emz
image005.png

Re: **Proposed Reissuance of the General Permit for the Discharge of Stormwater Associated with Industrial Activity Permit without Modifications**

Dear Permittee:

The current Industrial Stormwater general permit will expire on September 30, 2016. The current permit is proposed to be renewed *without modifications* for the period effective from October 1, 2016 through September 30, 2018. Current registrants will not be required to reregister to maintain coverage under the general permit. However, be advised that you must continue to comply with the terms and conditions of the general permit. The general permit's outfall monitoring program will continue in effect during this renewal period and any sampling exemptions already earned through the benchmark monitoring provisions of the general permit will remain in effect. No additional aquatic toxicity monitoring will be required.

The Commissioner intends to issue a new industrial general permit *with modifications* prior to October 1, 2018. The Department will, in the near future, publish and seek public comment on a notice of tentative decision to issue a new industrial general permit *with modifications*.

Please do not respond to this list serve notice. If you have any questions, please call the Stormwater Group staff at 860-424-3018 or send an email to DEEPStormwaterStaff@ct.gov.or contact the Water Permitting and Enforcement Division's "Engineer of the Day" at (860) 424-3025.

Connecticut Department of

ENERGY &
ENVIRONMENTAL
PROTECTION

PERMIT TO OPERATE A
COMMERCIAL HAZARDOUS WASTE AND USED OIL FACILITY

Pursuant to Chapters 439 and 446k of the Connecticut General Statutes ("CGS"), a Permit is issued to

Permittee:
Bridgeport United Recycling, Inc.
50 Cross Street
Bridgeport, Connecticut 06610

Facility Identification:
Permit Number DEP/HWM-015-001
EPA ID No. CTD002593887

To operate a commercial Hazardous Waste Storage and Treatment facility located at 50 Cross Street, Bridgeport, Connecticut in accordance with Sections 22a-6, 22a-449(c) and 22a-454 of the CGS as specified in the conditions and attachments set forth herein.

This Permit regulates and authorizes the transfer, storage, treatment, recycling and management of hazardous wastes, non-hazardous wastes, universal wastes and used oil accepted from off-site locations as well as wastes generated from on-site activities. The facility shall be operated by the Permittee. The activities include: loading and unloading of bulk and non-bulk containers; storage in containers, roll-offs, and tanks; treatment in tanks; truck-to-truck waste transfer; separation of solid and semi-solids wastes; separation of liquids from solids and semi-solids; solidification and consolidation of non-hazardous wastes to make them amenable for off-site transportation and disposal.

All terms used in this Permit are as defined in this Permit or if not defined in the permit are as defined in Section 22a-449(c)-100 of the Regulations of Connecticut State Agencies ("RCSA") or as defined in Title 40 of the Code of Federal Regulations ("CFR") Parts 260 through 264, 268, 270, 273, 279 and 124. Nothing in this permit shall preclude the Commissioner from reviewing and modifying the permit at any time during its term in accordance with 40 CFR 270.41, as modified by Section 22a-449(c)-110(a) (2) of the RCSA.

This Permit is based on the premise that information and reports submitted by the Permittee prior to issuance to this permit are accurate. The Permittee shall keep records of all the information used to complete the permit application, and any supplemental information submitted in connection with the permit application, for the effective term of this permit. The Resource Recovery Conservation and Recovery Act ("RCRA") Part B Permit application submitted to the Department by Bridgeport United Recycling, Inc. (BUR) is hereby incorporated by reference as part of this permit. BUR's application consists of two (2) volumes dated April 3, 2010. The Permittee shall keep records of all the information used to complete the permit application and any supplementary submittals. Any inaccuracies found in this information or information submitted as required by this Permit may be grounds for termination or modification of this Permit in accordance with 40 CFR 270.41, 270.42, and 270.43, as modified by Section 22a-449(c)-110(a)(2) of the RCSA, and potential enforcement action. The Permittee shall inform the Commissioner of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

The Permittee shall comply with all terms and conditions of this Permit. This Permit consists of the conditions contained herein (including those in any attachments) in Section I, Standard Facility Conditions; Section II, Permitted Activities; Section III, Operating Conditions; Section IV, General Facility Conditions; and Section V, Compliance Schedule; Section VI, Attachments (Attachment A, Waste Analysis Plan; Attachment B, Personnel Training; Attachment C, Inspection Plan; Attachment D, Contingency Plan; and Attachment E, Closure Plan), and the information as specified in the Permittee's permit application, except where the application is superseded by the more stringent conditions contained herein. Any violation of any provision of this Permit may subject the Permittee to enforcement action pursuant to the Connecticut General Statutes including but not limited to Sections 22a-6a and 22a-131.

This Permit may be revoked, suspended, modified, transferred, or reissued, in order to comply with the applicable law. The Commissioner may also modify this Permit when the Commissioner's deems it necessary to do so. The Permittee shall submit a revised permit application to the Commissioner at least one hundred eighty (180) calendar days before making any changes to any of the permitted areas or activities. Any revised application shall be approved in writing by the Commissioner prior to the Permittee implementing such changes.

The Permittee shall submit an application for renewal of this permit to the Commissioner at least one hundred eighty (180) calendar days prior its expiration date in accordance with 40 CFR 270.10(h).

This permit is effective on September 28, 2011 and shall remain in effect for five (5) years until September 28, 2016 unless revoked and reissued or terminated under 40 CFR 270.41 and 270.43, as modified by Section 22a-449(c)-110(a) (2) of the RCSA.

Yvonne Bolton

Yvonne Bolton
Chief
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection

September 28, 2011
Date

cc: Ms. Beth Deabay, Chief, RCRA Waste Management Section
EPA Region I, 5 Post Office Square, Suite 100 (OSRR07-1), Boston, MA 02109-3912

Connecticut Department of

ENERGY &
ENVIRONMENTAL
PROTECTION

CONNECTICUT HAZARDOUS WASTE PERMIT RENEWAL

TO OPERATE A

COMMERCIAL HAZARDOUS WASTE AND USED OIL FACILITY IN ACCORDANCE WITH THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) AND 22a-454 NON-RCRA REGULATED WASTES

FOR

BRIDGEPORT UNITED RECYCLING, INC.

50 CROSS STREET
BRIDGEPORT, CONNECTICUT 06610-3213

Permit No. DEP/HWM-015-001
EPA ID No. CTD002593887

PERMIT ISSUED – SEPTEMBER 28, 2011
PERMIT EXPIRES –SEPTEMBER 28, 2016

Prepared by:
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
RCRA Permitting Program

TABLE OF CONTENTS

AUDIT INFORMATION PACKAGE

Tradebe Treatment and Recycling of Bridgeport, LLC
50 Cross Street
Bridgeport, CT 06610

Last Revision: November 30, 2018

TABLE OF CONTENTS

Attachments

SECTION 1

GENERAL INFORMATION

Address: Tradebe Treatment and Recycling of Bridgeport, LLC
50 Cross Street
Bridgeport, CT 06610
Phone: (800) 404-4408 or (203) 334-1666
Fax: (203) 334-1439

Acronym: TTRB

EPA ID Number: CTD002593887

Principal Site Contacts: Kristoffer D Lubas, CHMM, CET, Environmental Specialist
Phone: (203) 238-8196 (Meriden, CT office)
Cell: (203) 537-3256

Plant Manager: Mike Davia
Phone: (800) 404-4408
Fax: (203) 334-1439

Corporate Information:
Tradebe Treatment and Recycling of Bridgeport, LLC (TTRB) is a private corporation owned and operated by Tradebe Treatment and Recycling Northeast, LLC. Tradebe is an international provider of environmental services. TTRB is part of the Tradebe USA operations, which are headquartered in East Chicago, Indiana where Tradebe also operates a TSDF. Tradebe owns and operates several other facilities in the northeast U.S. including Tradebe Treatment and Recycling Northeast, LLC (Meriden, CT), Laurel Petroleum (Meriden, CT), Tradebe Treatment and Recycling of Stoughton, LLC (Stoughton, MA), Tradebe Treatment and Recycling Northeast, LLC (Newington, NH), Tradebe Treatment and Recycling of Northborough, LLC (Northborough, MA), and Norlite, LLC (Cohoes, NY). Tradebe Transportation, LLC is a division of Tradebe providing licensed waste transportation in the northeast U.S. Tradebe Environmental Services, LLC is a division of Tradebe providing on-site Field Services in the northeast U.S.

Facility size: 3.5 acres **Active area:** 3.5 acres

General facility operating hours: Monday - Friday: 7am-7pm; Saturday: 7a.m.-2 p.m.; Sunday: closed

Note: The wastewater treatment facility operates 24 hours/day, 365 days/year.

Number of full-time employees: 25

See Attachment A for the facility layout diagram.

SECTION 2

FACILITY OPERATIONS

Since 1993, Tradebe Treatment and Recycling of Bridgeport, LLC has been treating and storing used oil, hazardous waste fuels, hazardous and non-hazardous wastewater, and containerized wastes (liquid and solid). TTRB operates a non-hazardous mix pit where solids and semi-solids can be solidified with materials such as sawdust and then transferred to a roll-off. TTRB has the ability to store and treat several types of waste streams. TTRB handles streams that are not treatable on-site by transporting them to a facility that can handle them (discussed in detail later in this section).

The following list summarizes site activities.

Site Activities:
Storage (used oil, hazardous and non-hazardous waste)
Treatment (wastewater)
Transfer (solids and liquids)
Recycle (hazardous waste fuels, used oils)
Blending (hazardous waste fuels, used oils, and solids/semi-solids)
RCRA large quantity generator of hazardous wastes

The following table presents a description of the waste streams handled on-site including volumes and off-site facilities used.

Tradebe Treatment and Recycling of Bridgeport, LLC
Description of Waste Streams

Waste Stream	Average Annual Throughput	Method of Handling	Amount of Waste Transferred Off-Site	Destination Facilities for Off-Site Transfers
Hazardous waste fuels (flammables, solvent contaminated oils)	600,000 gallons/year	storage, fuel blending	10% direct transfer	Norlite, LLC (Cohoes, NY) Essroc Cement (Logansport, IN) Giant Cement (Harleyville, SC)
Spec and off-spec used oil fuel	1,000,000 gallons/year	storage, fuel blending	10% direct transfer	Norlite, LLC (Cohoes, NY) Safety-Kleen Systems, Inc. (Bridgeport, CT) Tradebe Treatment and Recycling Northeast, LLC (Meriden, CT)
Hazardous and non-hazardous water (including oily water mixtures)	1,700,000 gallons/year	on-site treatment & discharge to POTW	0%	NA
Non-hazardous solids	32,000 tons/year	storage, solidification, transfer	85% (balance is recovered oil)	American Landfill (Waynesburg, OH), Ontario County Landfill (Stanley, NY) or Wheelabrator Technologies Inc. (Bridgeport, CT) trash to energy plant
Hazardous liquids and solids in drums/containers for transfer	420,000 pounds/year	storage, transfer	100%	Tradebe Treatment and Recycling, LLC (E. Chicago, IN); Tradebe Treatment and Recycling, LLC (Millington, TN); or Stablex Canada (Blainville, Quebec).

The following is a detailed list of accepted and prohibited waste streams for Tradebe Treatment and Recycling of Bridgeport, LLC Note that this list is not exclusive.

Accepted & Prohibited Waste Streams:

Accepted:
1. RCRA hazardous wastes (see permitted waste codes, page 8)
2. State hazardous wastes (Connecticut and other states, page 8)
3. Non-hazardous wastes
4. Acids
5. Activated carbon
6. Amines
7. Caustics

8. Combustible liquids
9. Commercial chemical products (i.e., off-spec)
10. Contaminated solids/debris
11. Crude oil
12. Drilling fluids/muds
13. Glycol
14. Halogenated/chlorinated solvents
15. Lab packs of permitted waste codes
16. Metal and plastic drums/containers
17. Misc. chemicals
18. Non-halogenated/non-chlorinated solvents
19. Oily sludges
20. Paint
21. Pigging wastes
22. Produced water
23. Scrap metal (e.g., drums and oil filters)
24. Sediment
25. Tank bottoms
26. Universal wastes
27. Used oil
28. Well workover fluids

Prohibited:

1. Catalysts
2. Cooling tower sludges
3. Desiccants
4. Dry asbestos solids
5. Gas cylinders (exception-aerosols)
6. Glass bottles/containers and other recyclables
7. Insulation
8. Medical/infectious waste
9. Pesticides
10. Radioactive waste
11. TSCA PCBs (>50 ppm)

Tradebe Treatment and Recycling of Bridgeport, LLC
Hazardous Waste Codes Accepted by Permit:

Ignitable:	D001
Corrosive:	D002
Toxicity Characteristic:	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

Listed Hazardous Wastes:	F001	F002	F003	F004	F005	F006*	F037	F038	
	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		

Universal Wastes: Batteries, Pesticides, Thermostats and Other Mercury Containing Devices, Lamps, & Used Electronics

* F006 in containers for storage only (no bulk, no treatment)

Connecticut Regulated Wastes Accepted:

CR01 TSCA PCBs (truck to truck transfer only; containers only)
CR02 Waste Oil
CR03 Wastewater Soluble Oil
CR04 Waste Chemical Liquid
CR05 Waste Chemical Solid

Note: Other state-regulated wastes are accepted.

Transportation and Profiling of Waste Streams: Primary methods of waste delivery are by tank and vacuum trucks. Secondary methods include box trucks and trailers for drums/containers and roll-off trucks. The greatest percentage of wastes is liquid in bulk tank trucks (5,000 gallons each). Liquids and solids also come in through drums/containers. TTRB does both milk run and dedicated pickups. Waste streams are screened through the Waste Analysis Plan which checks for incompatibles and substances not permitted for (e.g., TSCA PCBs). Based on these criteria, a determination can be made as to the acceptability of various materials. A waste profile is required from the generator of the waste.

Parameters Tested For and Analytical Methods Used: PCBs, total halogens, halogenated hydrocarbons, BS&W, metals, flash point, pH, phenols, and cyanide. All testing is done in accordance with prescribed ASTM Methods per the Waste Analysis Plan.

Review and Approval of the Waste Stream: The following personnel are involved in the review and approval of incoming streams: Plant Manager, Laboratory Manager, Approvals Manager, Technical Director, and EHS Manager.

Documentation of Incoming Waste Streams: Hazardous and Non-Hazardous Manifests, Bills of Lading, Chain of Custody records, drum logs, and receipt summary logs.

Verification of Incoming Waste Streams: Verification lab analysis is performed to ensure the facility is permitted to handle the incoming waste. Samples are drawn and analyzed before off-loading for all incoming waste streams. The truck waits in a staging area while this is done. Fingerprint laboratory analysis includes PCBs, pH, flashpoint, halogens, halogenated

hydrocarbons (if necessary), certain metals in water streams, BS&W, and compatibility checks. The waste is not off-loaded until analysis is complete and the waste meets acceptance criteria.

Wastes can be rejected if they are TSCA PCBs, reactive, incompatible, or fall into any category outlined under "Prohibited" above. When wastes are rejected they are either sent back to the generator or sent to a proper disposal facility with the generator or broker's approval.

Analysis of Materials Already in Storage: Wastewater treatment progress is measured by metals analysis throughout the process. Such analysis could yield results indicating non-permitted wastes or constituents present in the waste stream. Outgoing fuel may be sampled and analyzed for several parameters including PCBs and heat value. This sampling is done in accordance with the receiving facility's requirements and the used oil regulations.

Waste Analysis Plan:
The Waste Analysis Plan (WAP) is a portion of the facility's Part B permit. The latest version is dated September 28, 2011. The WAP includes parameters, test methods, sampling methods, sampling frequency, and procedures for retention of results.

Laboratory:
Tradebe Treatment and Recycling of Bridgeport, LLC's laboratory is used for pre-qualification screening and on-site arrival analysis to screen out non-permitted wastes and assess treatability of waste streams. The lab also tests the treatment efficiency of wastewater streams before discharge to POTW. The laboratory at Tradebe in Meriden performs the bulk of the pre-qualification screenings for the Meriden and Bridgeport facilities.

Major Lab Equipment: Atomic Absorption, Gas Chromatographs, Total Halides analyzer, Flash Point tester, pH meter, ion meter, Inductively Coupled Plasma Spectrometer (ICP-OES) and various wet chemistry techniques.

Once bulked and/or treated, the various waste streams at TTRB end up in the following facilities:

Tradebe Treatment and Recycling of Bridgeport, LLC
Off-Site Waste Facilities Used Following On-Site Processing

Waste Stream	Hazardous/ Non-Hazardous	Off-Site Management Method	Off-Site Facility Name	Off-Site Facility Location
Hazardous Waste Fuels	Hazardous	BIF facilities	Norlite, LLC Essroc Cement Giant Cement	Cohoes, NY Logansport, IN Harleyville, SC
Spec & Off-Spec Used Oil Fuels	Non-hazardous	Off-site fuel blending	Norlite, LLC Safety-Kleen Systems, Inc. Tradebe Treatment and Recycling Northeast, LLC	Cohoes, NY Bridgeport, CT Meriden, CT
Spent Activated Wastewater Carbon	Non-hazardous	Landfilled Burned	American Landfill Ontario County Landfill Wheelabrator Technologies Inc.	Waynesburg, OH Stanley, NY Bridgeport, CT
Spent Activated Vapor Carbon	Hazardous	BIF facilities	Norlite, LLC Essroc Cement Giant Cement	Cohoes, NY Logansport, IN Harleyville, SC
Hazardous Waste Solids with BTU value (e.g., bell filter solids)	Hazardous	Organics recovery through distillation	Tradebe Treatment and Recycling, LLC	E. Chicago, IN & Millington, TN
Non-hazardous Waste Solids (e.g., degrit solids)	Non-hazardous	Landfilled Burned (if BTU value)	American Landfill Ontario County Landfill Wheelabrator Technologies Inc.	Waynesburg, OH Stanley, NY Bridgeport, CT
Empty Drums *	NA *	Recycled	Milford Barrel	New Haven, CT

* Empty drums are cleaned with high-pressure rinse after they are emptied. Wash water is treated on-site. Empty drums are stored until a shipment is made off-site to a drum recycler-reconditioner.

Note: The above facilities were chosen based on the facility's permits, operations, cost of services, facility reviews, and reputation. Visits to the facilities were performed at first use. Formal annual audits are not conducted.

Operating Records:
Written operating records include sources of wastes received, waste descriptions and quantities, waste inventory, analytical records, methods and dates of storage/treatment, and a report/summary of any incident involving implementation of the Emergency Response/Contingency Plan.

Inspections: Equipment and tank/unit inspections are performed daily, weekly, monthly, and annually for different parameters. All inspections are documented and kept on file. Maintenance and repair based on the inspection results occurs as soon as possible after a deficiency is found.

Incoming Waste Streams: TTRB logs the receipt and shipment of bulk waste to and from the appropriate tanks. Wastewater transfers are also logged. Containerized waste records include receipt, disposition, tanks transferred to or off-site shipment dates.

Waste Storage: Wastes are typically stored a maximum of 2 to 3 days in bulk and 1-2 weeks in containers. The table below presents typical and permitted inventories of waste types.

Tradebe Treatment and Recycling of Bridgeport, LLC
Typical and Permitted Inventory

Storage Method	Typical Inventory	Permitted Inventory
Bulk Solid Waste (Roll-offs)	20 non-hazardous 1 hazardous	66 non-hazardous waste (or more if a permitted hazardous storage area is used) 11 hazardous waste
Drums/Containers	70 total (~25 hazardous)	175 (55-gallon equivalents) (hazardous or non-hazardous aggregate total)
<u>Tanks:</u> Hazardous Waste Fuel Used Oil Hazardous Wastewater Non-hazardous Wastewater	 12,000 gallons 25,000 gallons 18,000 gallons 54,000 gallons	134,750 gallons total 119,750 gallons of hazardous waste 15,000 gallons of non-hazardous waste (or more if a permitted hazardous tank is used)

Eleven on-site tanks, having a total capacity of 119,750 gallons, are permitted to store hazardous waste. Operationally, however, only 3-4 of them are actually used for hazardous waste storage. One 15,000-gallon tank is permitted for non-hazardous waste only. Tanks not used for hazardous waste are used for the pre-processing and treatment of used oil and pre-processing of wastewater. The wastewater treatment tanks are not included in these numbers. The wastewater treatment system is exempt from RCRA and covered through a permit under the Clean Water Act.

More information on tanks can be found in Section 3.

SECTION 3
FACILITY DESIGN

Attachment A is a facility layout diagram. TTRB consists of the outdoor Tank Farm Area where bulk liquids are stored and treated, the indoor Wastewater Treatment Area (Water Room), the indoor Barrel Storage Area, the outdoor water treatment and other tanks, the outdoor solids/semi-solids mix pit, the outdoor solids consolidation area, the outdoor roll-off storage areas, the outdoor trailer staging area, and the indoor offices and laboratory.

Storage Areas: Wastes are stored either in one of 11 aboveground storage tanks in the Tank Farm Area (TFA), in drums/containers in the Barrel Storage Area (BSA), or in roll-offs in the outdoor roll-off storage area. The storage areas are inspected daily, weekly, and monthly for different parameters.

Transfer Area: TTRB operates a Trailer Staging Area where up to two trailers can be parked for the transfer of containerized wastes and empty containers. This area is only used for transfer and is not considered a storage area.

Tank Farm Area: For non-hazardous waste streams, trucks offload into the degrit system to filter out solids. For hazardous waste streams, trucks offload through the bell filter to strain solids. Liquid product from these two filters is sent to one of the storage/treatment tanks, depending on the product. Non-flammables are heated to achieve phase separation of oil. Water is sent to the wastewater treatment system. Waste oils and hazardous waste fuels are blended and eventually transferred off-site. Tank information is presented in the table below.

Tradebe Treatment and Recycling of Bridgeport, LLC
Tank Information

Tank	Type	Capacity (gallons)	Year Installed	Contents
1	Horizontal	18,000	2014	Wastewater
2	Horizontal	18,000	2014	Wastewater
3	Horizontal	18,000	2014	Wastewater
3A	Horizontal	750	1990	Vapor Recovery Condensate/Tank Overflow
4	Horizontal	18,000	2014	Wastewater
5	Vertical	7,500	1990	Oil/waste mixtures
6	Vertical	8,000	1990	Oil/waste mixtures
7	Vertical	8,000	1990	Oil/waste mixtures
8	Vertical	7,500	1990	Oil/waste mixtures
9	Vertical	8,000	1990	Oil/waste mixtures
10	Vertical	8,000	1990	Oil/waste mixtures
11	Vertical	15,000	2004	Waste oil/used oil fuel
Total RCRA Capacity		119,750		
Total Capacity (including Tank 11)		134,750		

All tanks are steel above ground tanks. Visual inspections are performed daily; internal inspections are performed when the tanks are cleaned. All tanks are located in secondary containment concrete vaults. Secondary containment volume exceeds regulatory requirements. Tanks are raised to permit visual inspection of bottoms. Accumulated precipitation in secondary containment is pumped and treated in the wastewater treatment area before final discharge to the POTW.

All the tanks in the table are permitted to store hazardous waste with the single exception of Tank 11, which is used to store used/waste oil (non-hazardous) only. Operationally only three to four of the tanks are used to store hazardous waste.

All tanks are piped to a vapor recovery system consisting of two carbon adsorption beds. TTRB's tank system meets the RCRA Subparts AA-CC requirements.

Waste Management: The approval and receipt of wastes at Tradebe Treatment and Recycling of Bridgeport, LLC is conducted in strict accordance with written procedures contained in the Waste Analysis Plan. To be considered for acceptance, a generator must first qualify its waste stream. A profile sheet is completed based upon known characteristics of the waste chemical process or through analytical testing of a waste stream. A representative sample is collected and

submitted to the laboratory. Analytical tests are performed to identify and characterize the waste. When sufficient information is available to make a determination, the generator is informed of TTRB's decision to approve or deny acceptability of the waste stream. Waste shipments are scheduled following approval to accept the stream.

All hazardous waste shipments are received on a hazardous waste manifest. Non-hazardous or state regulated wastes are shipped based on the state requirements. All shipments must be transported by an approved state of Connecticut transporter with credentials on file at TTRB. The manifest must specifically identify TTRB as the recipient unless the waste is to be managed as a truck to truck transfer to another facility.

Upon arrival, the paperwork is reviewed at the facility. A representative sample is taken via a coliwasa, and the truck is staged. To assure that the waste being received is the same as that pre-approved, the sample is screened for fingerprint analysis. Any discrepancies between the actual waste received and the pre-approved sample are immediately resolved through telephone communication with the generator and/or broker prior to off-loading.

Upon acceptance, the bulk truck is directed to the off-loading area. The truck is off-loaded via a 6 inch hose into the degrit system or bell filter which separate and break down any sediment and solids. Separated solids are drummed and transported off-site. The material is then pumped into an appropriate tank based on the material type and analytical results from the lab. All material is separated for either fuel blending or wastewater treatment at the site. Drums are processed similarly.

Once off-loading is complete, the paperwork is signed and the driver receives a copy of the manifest/shipping paper, the work order, and the chain of custody (with any analytical results attached). The remaining copies of the manifest are distributed to the appropriate state agencies and the generator. Shipping paper information is entered in the Tradebe Treatment and Recycling of Bridgeport, LLC computer system. Copies of all manifests/shipping papers are kept on file indefinitely. Hazardous waste and used oil fuels are distributed off-site as presented in the table that follows this discussion.

Recycling and Treatment Processes: The recycling and treatment processes are divided into four distinct categories described below.

1. Hazardous Waste Fuel Blending: Materials that are hazardous wastes and that meet the criteria for fuel blending (i.e., halogens, BTU, specific gravity, water content, and pH) are bulked into one of several storage/treatment tanks. The material is heated up to 200° F to separate the water and/or chemicals from the oil. Once the material is separated, it is blended with other hazardous waste fuels to meet kiln specifications. The material is bulked onto a tractor/trailer and shipped to one of three licensed hazardous waste fuel burners where it is used for its thermal value. These burners are presented in the table that follows. Only licensed transporters are used to ship this material.

2. Non-Hazardous Used Oil Fuel: The incoming non-hazardous used oil is initially pumped through the degrit system. The separated solids are drummed and transported off-site. The

fuel is then pumped to a tank. Water and solids are settled out in tanks using heat addition and demulsifiers. The oil is heated up to 200°F. The separated water is treated on-site as indicated in #3 below. The fuels are distributed as indicated in the table below.

3. Wastewater Treatment: Tradebe Treatment and Recycling of Bridgeport, LLC's wastewater treatment process consists of three separate steps in series with the resultant effluent being discharged to the City of Bridgeport POTW. The treatment flow is ultrafiltration, chemical precipitation, and biological treatment. Ultrafiltration removes soluble oils and high molecular weight organic compounds. Chemical precipitation removes smaller constituents and metals. Biological treatment reduces Biochemical Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) and organic constituents prior to discharge to the POTW. A carbon adsorption process is maintained on-site if needed (which is infrequent) for trace organic constituents.

   Waste oil/water emulsions and other wastewater will settle in the tanks before being pumped to the ultrafiltration feed tanks. The pH of the emulsions and other wastewaters will be adjusted to between 8 and 9 in preparation for ultrafiltration. The process temperature is maintained at or around 120° F. From the ultrafiltration feed tanks, the water is directed to one of two ultrafiltration units. The units push water through at 60 psi at a return rate of 300 gallons per minute (gpm). The permeate, which averages 5-6 gpm, is pumped to separate tanks.

   After the ultrafiltration concentrate is reduced to a solution which is approximately 40% water and 60% oil, the units are flushed and emptied to remove the oil from the membrane tubes. The permeate is treated by chemical precipitation and biological treatment. The ultrafiltration waste (concentrate) is blended with hazardous waste fuels and shipped off-site for energy recovery. The precipitated solids from the chemical precipitation process are not hazardous and are disposed of off-site in a Subtitle D Landfill after de-watering in an on-site filter press. Solids from the biological treatment process are returned back into the process, therefore not producing a waste stream.

4. Non-Hazardous Solids Mixing/Bulking: Non-hazardous solids generated from the above processes and by outside generators are solidified in a concrete-lined mix pit and placed in a roll-off or coal bucket container. The roll-offs are stored on-site until shipment off-site for treatment/disposal. The coal bucket containers are typically hooked to the transport vehicle for removal off-site immediately after loading. If the solids do not require solidification, they may also be managed in a separate area prior to outbound shipment.

The hazardous waste fuel blending and used oil operations are continuous. Fuels are monitored for temperature and water content to maximize BTU content during the process to assure they meet burner's specifications. Wastewater treatment is a continuous process performed in 4 to 5 hour runs, 3 runs/day, and 7 days/week. Wastewater is monitored during the process to assure it meets permitted discharge limits. Non-hazardous solids mixing/bulking are performed in a batch manner, dependent on volume.

Tradebe Treatment and Recycling of Bridgeport, LLC
Outlet for Product Reclaimed or Regenerated from Treated Wastes

Product	Outlet	Use
Hazardous waste fuel	Norlite, LLC Cohoes, NY (primary)	Fuel for light weight aggregate manufacturing
Hazardous waste fuel	Essroc Cement Logansport, IN	Cement kiln fuel
Hazardous waste fuel	Giant Cement Harleyville, SC	Cement kiln fuel
Used oil fuel	Safety-Kleen Systems, Inc. Bridgeport, CT	Terminal to various end users in the fuel market or re-refined for use as a recycled oil
Used oil fuel	Norlite, LLC	Fuel for light weight aggregate manufacturing
Used oil fuel	Tradebe Treatment and Recycling Northeast, LLC Meriden, CT	Blends prior to shipment to terminal that ships to various end users in the fuel market

Regenerated/reclaimed products are tested before shipment for the following.
Hazardous waste fuel: PCBs, BTU content, halogens, flash point, and % breakdown.
Used oil fuel (if shipping as spec oil): A minimum of PCBs, halogens, metals, & flash point; other tests dependent on receiving facility's needs are: specific gravity, % breakdown, BTU content, viscosity, ash, and sulfur; (note that these may be run at an outside lab).

Barrel Storage Area: Drum storage is an indoor area. Stacking on pallets is 2 drums high only with a minimum 24 inch aisle space between pallets. 175 55-gallon drum equivalents are permitted to be stored at TTRB. Average inventory is 50 drums. Drums are labeled to identify contents and whether hazardous or non-hazardous. Drums are segregated by waste type. The Barrel Storage Area is fully contained by virtue of being indoors. The floor of the BSA is coated and contains three bermed rows. The berms are one foot high. There is also a trench in front of the garage door to the BSA to prevent run-on or run-off.

Wastewater Treatment: TTRB has a permit to treat and dispose of wastewater to the city of Bridgeport Publicly Owned Treatment Works (POTW). Treatment includes ultrafiltration, chemical precipitation, carbon adsorption (only when needed), and biological treatment. The wastewater permit is included as Attachment B. Treatment criteria are included in the permit. Discharge to the POTW is monitored to verify permit limits are being met.

Stormwater: Run-on of stormwater is prevented in the Tank Farm Area by virtue of the secondary containment walls. The Barrel Storage Area is indoors with a trench in front of the garage door and therefore does not get run-on. Stormwater that accumulates in the parking and truck traffic area flows into catch basins on-site which flow to an on-site oil-water separator. The water is discharged to the city stormwater system; the collected oil is pumped out and managed through the on-site treatment system. Stormwater run-off is diverted away from active portions of the site by virtue of the pitch of the yard. Stormwater is also collected in active portions of the site through secondary containment. Tank Farm Area stormwater that is collected in secondary containment is pumped out with a vacuum truck. The stormwater is sent through the on-site wastewater treatment system.

There are no limits on the stormwater general permit. The following parameters are measured semiannually in accordance with the permit: Total Oil & Grease, pH, Chemical Oxygen Demand, Total Suspended Solids, Total Phosphorous, Total Kjeldahl Nitrogen, Nitrate, Total Copper, Total Zinc, Total Lead, and Aquatic Toxicity (first 2 years of permit).

Flood Plain: Tradebe Treatment and Recycling of Bridgeport, LLC is not located within a 100-year floodplain.

Underground Storage Tanks: There currently are no underground storage tanks at TTRB. In the past, two underground storage tanks were removed from the facility. A 1,000 gallon #2 fuel oil tank was removed in January 1993 and a 6,000 gallon diesel fuel tank was removed in 1997. A closure certificate was submitted by TTRB to the State. Upon removal, neither of these tanks showed any signs of leakage. There were four 20,000 gallon and two 7,000 gallon underground tanks mentioned in a 1993-1994 Phase I study. All six tanks were utilized for used oil processing by a previous owner. According to records, these six processing tanks were removed by the previous owner in 1987 and 1988.

Mix Pit and Non-Hazardous Solids Storage: Non-hazardous solids needing solidification are bulked up in the mix pit and placed in roll-off containers. Solids that do not need solidification to remove the moisture content are stored on-site (both in roll-offs and smaller containers) until arrangement is made for off-site shipment.

Pavement: 100% of the site is paved.

Air Pollution Controls: A Vapor Recovery System is in operation for the Tank Farm Area. The system consists of closed vent piping for all of the tanks to two carbon adsorption beds. The site has met all EPA RCRA Subpart AA, BB, and CC requirements.

SECTION 4

ENVIRONMENTAL COMPLIANCE

Tradebe Treatment and Recycling of Bridgeport, LLC is a RCRA Part B and state of Connecticut 22a-454 permitted facility. The Part B permit was formally issued on September 28, 2011. This same permit covers non-hazardous operations including used oil fuel blending and mix pit operations. Wastewater treatment and discharge and stormwater discharge are separate permits covered under the Clean Water Act. Permits are listed in the table below.

Tradebe Treatment and Recycling of Bridgeport, LLC
Environmental Permits

Regulatory Authority	Permitted Activity	Permit #	Issue Date	Expiration Date
Connecticut Dept. of Environmental Protection (CT DEEP)	Hazardous and Non-Hazardous Waste Storage and Treatment (See Attachment D: RCRA Part B & CT 22a-454 Permit Signature Page & Cover/TOC)	DEP/HWM 0015-001	9/28/2011	9/28/2016*
CT DEEP	Wastewater Treatment (See Attachment B: Wastewater Treatment Permit)	SP0000101	3/15/11	3/14/16*
CT DEEP	Stormwater (See Attachment C: Stormwater General Permit)	GSI 000514	9/30/11	9/30/19
CTDEEP	Facility-wide Air Emissions	015-0304-GPLPE		9/8/2020

*Permit Renewal currently under review. Operating under extension of current permit

CT DEEP Inspections: The Connecticut Department of Energy & Environmental Protection is the state regulatory agency with environmental oversight to TTRB. The DEEP inspects the facility on a formal basis annually for wastewater treatment and biennially for waste operations. Inspections for air emissions are sporadic.

CT DEEP Waste Inspections: The most recent inspection was conducted September 2017.

CT DEEP Wastewater Inspections: Inspections over the last three years have revealed only minor deficiencies that were correctly in a timely manner. The most recent inspection was conducted in February 2019.

CT DEEP Air Inspections: The last air inspection was done in December 2012. Based on this and previous inspections, no permits are needed at the facility.

CT DEEP Notice of Violations (NOVs): TTRB received a NOV for odor complaint in May 2017. In September 2017, TTRB was issued an NOV for RCRA violations from satellite container storage accumulation, SA area hazardous waste labelling, failure to complete weekend inspection logs, failure to put full name and time on inspection logs, failure to submit Remedial Action Plan , F006, F019 waste profiling issue and RCRA Tank certs. In March 2018, TTRB was issued a NOV for wastewater exceedances of Antimony and Vanadium. In July 2019, TTRB was issued an NOV for wastewater exceedances.

Environmental Regulatory Agency Contacts

Agency Name	Contact - Title	Mailing Address	Telephone
CT DEEP	Carmen Holzman - Waste Permit Writer	79 Elm Street Hartford, CT 06106	(860) 424-3569
CT DEEP	Mark Jepsen - RCRA Inspector	79 Elm Street Hartford, CT 06106	(860) 424-3270
CT DEEP	Christine Gleason - Wastewater Permit Writer	79 Elm Street Hartford, CT 06106	(860) 424-3278
CT DEEP	Chris Gerke - Wastewater Inspector	79 Elm Street Hartford, CT 06106	(860) 424-3818
CT DEEP	Bob Girard - Air	79 Elm Street Hartford, CT 06106	(860) 424-3461

SECTION 5
HEALTH & SAFETY

Tradebe Treatment and Recycling of Bridgeport, LLC is proactive in seeking a safe and healthy workplace. A full Health & Safety Plan is in place at the facility. TTRB has never had a serious fire, explosion, or fatality.

In April 2013, the Bridgeport Field office of OSHA conducted an inspection and issued citations for non-rated electrical equipment in a rated area and for respiratory protection issues related to emergency response equipment. All of these deficiencies were corrected in a timely manner.

SECTION 6

SITE GEOLOGY/GROUNDWATER

[Much of this information was gathered through the initial site assessments of the property.]

Site Assessments: Prior to purchasing the property which Tradebe Treatment and Recycling of Bridgeport, LLC now occupies, an environmental history (site assessment) of the land/facility was performed. The assessment revealed only a few past releases by previous owners including tank overfills, a #4 oil spill, and a #2 oil spill. Based on historical reporting, the tank overfills and oil spills were contained and recovered. TTRB believes that a prior owner (pre-1977 home heating oil terminal) contaminated the subsurface beneath the Tank Farm Area through the release of #4 oil. Most of the contamination is in the form of floating product on the groundwater. TTRB has removed contaminated soil and product beneath the Tank Farm Area.

Geology: The site is underlain by sand deposits. Soils consist of fine silty sand to medium sand and gravel. The bedrock of the site is identified as the Derby Hill member of the Orange formation. This Ordovican age rock unit is described as a thin-bedded, fine to medium "pinstripe" muscovite schist and gneiss with interlayered medium to coarse grained garnet-biotite-chlorite-plagioclase-quartz-muscovite-schist. Bedrock is shallow on-site, and varies in depth from 11 to 16 feet below grade.

Groundwater: The city of Bridgeport uses city water. The closest drinking water site is a reservoir 5 miles north of the site. There are two other reservoirs 6.5 miles northwest of the site. The groundwater located below the site is classified as a GB aquifer, unsuitable for drinking without treatment. Groundwater in the area is neither used to irrigate crops nor feed livestock. Groundwater flow is northeast to southwest. The depth to the top of the shallowest saturated zone is 8 feet.

Groundwater Monitoring: TTRB performs groundwater monitoring to characterize the site on an ongoing basis. The monitoring is voluntary and not required by the state. There are a total of 7 wells on-site, 3 up gradient, 3 down gradient, and 1 cross gradient. The samples are currently analyzed for total metals, petroleum hydrocarbons, and volatile organic compounds. 2010 results indicate hydrocarbon contamination in two of the monitoring wells. It is believed that much of this contamination was caused by the #4 oil spill on-site by previous owners; (see above). The wells in the area are unproductive and the CT DEEP has no plans to remediate GB aquifers in the state. Regardless of this fact, TTRB installed a pump and treat recovery well in 2003 to remove any product in the aquifer. This historical spill and its status will be covered under the RCRA Corrective Action program (see Section 8-Remedial Activities).

Because of the transfer of property to Tradebe in 2011, TTRB is involved in the CT Transfer Act which requires Licensed Environmental Professional (LEP) review of site history including groundwater monitoring. TTRB is also involved in the RCRA Corrective Action Program per its 2012 Part B Permit. The two programs are similar and being managed by the same LEP group. New wells were drilled and soil borings were taken between 2011 and 2013. Additional data will become available as these programs progress.

SECTION 7

DEMOGRAPHICS

Bridgeport is a large city with a population of ~145,000. Within one mile of the site it is estimated that there are 30,000 residents and workers. The area surrounding the facility is a mixture of residential and commercial/industrial. To the north is residential starting across the street from the facility; to the west, south, and east is commercial including a home heating oil company, a bus company, and a lumber supplier.

Surface Waters: Surface waters and distances from the facility include the following:

Bruce Pond	0.2 miles east	Yellow Mill Channel	0.6 miles west
Johnsons Creek	0.9 miles south	Pequonnock River	1.5 miles west
Bridgeport Harbor	1.5 miles southwest		

Johnsons Creek and Yellow Mill Channel are small inlets from Bridgeport Harbor (a section of Long Island Sound, the ocean). The Pequonnock River flows from the north and empties into Bridgeport Harbor. The creek, channel, and river are all about 1/10 to 1/5 mile wide and vary in length. The inlets and river are mainly commercial transportation byways. Bridgeport Harbor is used for the same purpose, as well as public transportation and pleasure boating/swimming.

Sensitive Receptors: Sensitive receptors including a hospital and schools near the facility are the following:

Bridgeport Hospital	~0.25 mile
Hall School	~0.25 mile
McKinley School	~0.4 mile
Lincoln School	~0.5 mile
Harding High School	~0.5 mile
St. Ambrose School	~0.5 mile
several other schools	0.5 - 2 miles

Buffer Zone: All of TTRB's storage tanks, wastewater treatment units, and containers are fully contained. In the event of a spill, materials will be captured and reclaimed. Catch basins and trenches are employed to catch spills, run off, run on, and stormwater.

Contamination Near the Facility: There are no known sources of contamination including superfund sites or landfills near the facility.

SECTION 8

INCIDENT NOTIFICATIONS AND REMEDIAL ACTIVITIES

In 2017, Tradebe Treatment and Recycling of Bridgeport, LLC had 2 instances where they had to implement their Emergency Response/Contingency Plan. Both were for fires in the non-hazardous mix pit, one occurred in July. A fire was detected in the Mix Pit at ~5:12 am by a Bridgeport Police Officer. The Police Officer called Bridgeport Fire Department who responded quickly and had the fire extinguished by 5:30. The Fire inspector indicated the fire started on the surface of the Mix Pit. It is suspected that fire was instigated by local firework activity.

The other fire in the non-hazardous mix pit occurred in September. A smoldering fire was detected in the Mix Pit at just before 4:00 am by a Bridgeport Police Officer. The Police Officer notified facility personnel and called Bridgeport Fire Department. The Fire department responded quickly and had the fire extinguished by 5:00am. It is suspected that fire was dry, non-hazardous Sodium Hydroxide Solids heating up with possible incompatible materials.

Incident Notifications: Past releases that prompted an incident notification include the following. A #2 oil spill occurred from a previous operation in the early 1970s (quantity unknown). There was a #4 oil spill from previous operation (Hitchcock Gas Engine Company) in late 1989 (2,500 gallons). It was reportedly fully contained and recovered. In January 2004, a wastewater discharge holding tank ruptured releasing approximately 10,000 gallons of wastewater into the containment vault. The material was recovered and the tank repaired. The incident was reported to CT DEEP. In December 2004, a nozzle came loose while fueling a truck and released approximately 10 gallons of diesel fuel to the asphalt yard. Fuel was recovered and the area cleaned. The incident was reported to CT DEEP.

Remedial Activities: A substantial amount of soil was removed in loading/unloading area in the mid-1990s. A recovery well was installed in 2003 to pump and treat groundwater that revealed contamination based on the reported oil spills that occurred under previous ownership. Product was removed from the aquifer during a 1 year period, until product was no longer detected. The system is still in place but has not operated in many years. The facility is subject to RCRA Corrective Action with the issuance of the 9/28/11 Part B permit (per state adoption of regulations) and subject to RCRA closure. See Section 6-Groundwater Monitoring for more information on Corrective Action Program.

SECTION 9

PERSONNEL & TRAINING

Onsite Management Staff:
Mike Davia - Plant Manager

Other On-Site Staff:
15 plant operators, 3 laboratory technicians, 3 clerical staff, and 2 maintenance staff.

Environmental, Health, & Safety Staff (offices in Meriden, CT):
Amy Bassilakis– Environmental Technician
Peter Flockhart - Health & Safety Specialist (office in Bridgeport, CT)
Kristoffer D Lubas, CHMM, CET – Environmental Specialist

Training: TTRB has a comprehensive training program for both new and current employees. Training is documented for each person that participates. Training includes specific requirements of individual jobs, and overall environmental, health, and safety. Training is both on-the-job and formal classroom. TTRB performs most of the training in-house, with the exception of 40 and 24 hour HAZWOPER training which is taught by an outside company.

EHS Inspections: TTRB maintains a checklist and inspection log to determine areas where the facility needs maintenance or improvement. Deficiencies are corrected as soon as possible after they are detected and corrections are documented.

Emergency Response: Tradebe Treatment and Recycling of Bridgeport, LLC uses telephones, an intercom system, and two way radios for communication. Fire control equipment includes various types of hand-held extinguishers. There are fire hydrants across the street from the facility and foam is kept on-site for the Fire Department's use. Spill response and decontamination equipment is documented in the Emergency Response/Contingency Plan (ERP) and is maintained on-site per the plan. TTRB has a written Spill Prevention and Countermeasure Control Plan (SPCC) and a written ERP. The SPCC and ERP include emergency procedures, emergency coordinator and alternates, a list of emergency equipment on-site, an evacuation plan, and arrangements with local authorities including police, fire department, and oil spill response organizations.

Equipment Maintenance: TTRB tests and maintains its equipment to the manufacturer's recommendations, or to greater standards based on experience.

Trade Associations: Tradebe Environmental Services, LLC is a member of the Connecticut Environmental Forum and the Environmental Technology Council. Environmental and Safety professionals belong to associations such as the Board of Certified Safety Professionals (BCSP) and Association of Hazardous Materials Professionals (AHMP).

SECTION 10

FINANCIAL INFORMATION

Financial information is available upon request and subject to a confidentiality agreement.

SECTION 11

INSURANCE & CLOSURE PLAN

Insurance: Attachment E presents the Certificate of Insurance covering Tradebe Treatment and Recycling of Bridgeport, LLC and sister companies/facilities. For environmental coverage, there is a $10,000,000 limit per occurrence and $30,000,000 annual aggregate for the facility.

Closure Plan: RCRA and non-RCRA requirements include a properly funded Closure Plan to clean and close the facility to EPA/DEEP standards. TTRB uses a Surety Bond to meet these requirements. Attachment F presents the most recent closure cost estimate update for TTRB.

SECTION 12

SITE SECURITY

Fence & Gate: The facility is fully surrounded by an electronic gate-accessed 7 foot chain linked fence. The gates are only accessed through remote control by employees and intercom access by others. The push button intercom prompts the Shipping/Receiving office to confirm access before opening the gate.

Signs: Signs with the warning "Danger - Unauthorized Personnel Keep Out" (or equivalent) are posted at each gate and several other areas on the chain link face.

ATTACHMENT A

FACILITY LAYOUT

ATTACHMENT B

WASTEWATER TREATMENT DISCHARGE PERMIT

ATTACHMENT C

STORMWATER DISCHARGE GENERAL PERMIT

ATTACHMENT D

RCRA PART B & CT 22a-454 PERMIT
SIGNATURE PAGE & COVER/TOC

ATTACHMENT E

CERTIFICATE OF INSURANCE

ATTACHMENT F

FINANCIAL ASSURANCE UPDATE

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

Bureau of Materials Management and Compliance Assurance
Notice of Sufficiency

Eric Stager
TRADEBE TREATMENT AND RECYCLING OF BRIDGEPORT, LLC
50 Cross Street
Bridgeport, CT 06610

Permit No. SP0000101

The Department of Energy and Environmental Protection ("the Department") hereby gives notice that Application No. 201506159, submitted on September 16, 2015 for a permit to discharge wastewater associated with the treatment of hazardous and non-hazardous wastewaters in Bridgeport, along with supplemental documentation dated December 21, 2015, is sufficient.

Your application is being reassigned to Steve Edwards, Sanitary Engineer, who will review the application for technical adequacy. If you have any questions about your application, you should contact Mr. Edwards at (860) 424-3838.

Upon completion of technical review, the Department will issue a tentative determination on your application.

Pursuant to Section 22a-3a-2(e) of the Regulations of Connecticut State Agencies, nothing in this notice shall be deemed to preclude the Department from requesting additional information concerning your application. It is not uncommon for questions to arise during technical review, which require additional information to resolve.

The Department will make every effort to work with you to resolve any such issues. Your prompt response to any requests for additional information will expedite the processing of your application.

In accordance with 22a-6j(a) of the Connecticut General Statutes Permit No. SP0000101 that expires on March 14, 2016 is continued in effect until such time as the Commissioner issues a final determination on the application for renewal.

Jan. 4, 2016
Date

Kim E. Hudak
Kim E. Hudak, P.E.
Assistant Director
Water Permitting and Enforcement Division
Bureau of Materials Management and
Compliance Assurance

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

July 25, 2016

NOTICE OF SUFFICIENCY

Mr. Eric Stager, CIH, CSP
EHS Manager – Northeast
Tradebe Environmental Services, LLC
47 Gracey Avenue
Meriden, CT 06451

Re: Notice of Permit Application Sufficiency – Application No.: 201604410
Tradebe Treatment and Recycling of Bridgeport, LLC
50 Cross Street, Bridgeport, CT 06610
EPA ID Number CTD002593887
Renewal of a Commercial RCRA Hazardous Waste Facility Permit

Dear Mr. Stager:

The Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division ("WEED") acknowledges the receipt of Application Number 201604410 submitted to the Department of Energy and Environmental Protection Central Permit Processing Unit by Tradebe Environmental Services, LLC on April 1, 2016, and amended on May 31, 2016 and July 6, 2016 for a renewal permit to continue operating a Commercial Resource Conservation and Recovery Act (RCRA) Hazardous Waste Storage and Treatment Facility pursuant to the Connecticut General Statutes (CGS) Sections 22a-449(c) and 22a-454. The application was submitted for the Renewal of Permit Number DEP/HWM-015-001, issued on September 28, 2011, for a Commercial RCRA Hazardous Waste and 22a-454 facility located at 50 Cross Street, Bridgeport, Connecticut.

A preliminary review of the application has been conducted, and the Department has determined that the application is sufficient. Upon completion of the technical review, the Department will issue a tentative determination on your application.

Pursuant to the Regulations of Connecticut State Agencies (RCSA) Section 22a-3a-2(e), nothing in this notice shall be deemed to preclude the Department from requesting additional information concerning your application. It is not uncommon for questions to arise during technical review, which require additional information to resolve. The Department will make every effort to work with you to resolve any such issues. Your prompt response to any requests for additional information will expedite the processing of your application.

Your application has been assigned to Carmen Holzman for technical review. If you have any questions about your application please contact her at email carmen.holzman@ct.gov or at (860) 424-3569.

Sincerely,

Robert C. Isner
Director
Waste Engineering and Enforcement Division
Bureau of Materials Management and Compliance Assurance

TRADEBE TREATMENT AND RECYCLING, LLC

TRADEBE Environmental Services, LLC ™

GENERATOR WASTE STREAM PROFILE SHEET

Profile # _____

Process Code _____

Email completed profile sheet to your Sales/Customer Service Representative or usa.approvals@tradebe.com

A. GENERATOR INFORMATION:

SITE ADDRESS

USE CONTINUATION IF SITE & MAILING ADDRESSES ARE DIFFERENT

Generator #: _____

Generator Name: NYSEG

Generator Address: 150 Water St

City: Penn Yan State: NY Zip: 14527

Contact Name: John Ruspantini

Generator Phone: (607) 725-3801

Generator Fax: _____

Generator Email: jjruspantini@nyseg.com

Generator USEPA/Federal ID # : NYD980531313

CUSTOMER INFORMATION:

Customer #: _____

Customer Name: _____

Customer Address: _____

City: _____ State: _____ Zip: _____

Contact Name: _____

Customer Phone: _____

Customer Fax: _____

Customer Email: _____

Customer Service/Sales Rep: _____

If no ID number is the Generator a VSQG (Very Small Quantity Generator)? ☐ Yes ☒ No

Generator NAICS Code: _____ Generator State ID # (If applicable): _____

Mailing Address if different than Site Address: *(Please use Profile Continuation page if additional information is supplied)*

Name: NYSEG Address: 18 Link Dr

City: Binghamton State: NY Zip: 13904

Please check if generator has "No Canada Disposal" policy ☐ Yes

Please check if generator has "No Landfill" policy ☐ Yes

Please list other disposal rescrictions: _____

Facility Restrictions, (If Any):

B. WASTE STREAM INFORMATION:

Generator's Waste Name: Water

Describe Process Generating Waste (Flowcharts, if applicable): Treated Site Remediation water with elevated Total Cyanide unsuitable for discharge to local WWTP.

Is this waste exempt from RCRA regulation? ☐ Yes

If "yes" explain or cite regulation below: (Example: Hazardous secondary material, HHW, CESQG):

Is this waste from a CERCLA cleanup site? ☐ Yes

Waste determination was made by: ☒ Testing ☐ Generator Knowledge ☐ SDS/MSDS ☐ Sample ☐ Other: _____

(Attach analytical, SDS/MSDS, or other supporting documentation used for waste determination)

Does the Waste have any of the following characteristics? ☐ Yes *(if yes check all that apply)* ☒ No

☐ Oxidizer	☐ Dioxin or Suspect	☐ Water Reactive	☐ Air Reactive	☐ Organic Peroxide
☐ Hexachrome	☐ Infectious Waste	☐ Radioactive	☐ Chelating Agent	☐ Lachrymator
☐ Explosive	☐ Shock Sensitive	☐ Polymerizer	☐ Pyrophoric	☐ Inhalation Hazard, Zone ___

C. GENERAL CHARACTERISTICS:

Color: Clear

Odor: None

☒ None ☐ Mild ☐ Strong

Physical State @ 70 F

☒ % liquid ☐ % solid ☐ % sludge ☐ % debris

☐ aerosol ☐ powder ☐ other

Phases

☐ single layer ☐ double layer ☐ >2 layers how many? ___

BTU/lb

☐ <3000(*Ex:* water) ☐ 3,000-5,000 ☐ 5,000-10,000 ☐ >10,000 (*Ex:* oil)

pH

☐ <2 (Acid) ☐ 2.0-4.0 ☒ 4.0-10.0 ☐ 10.0-12.5 ☐ >12.5 (Base) ☐ N/A

Viscosity _____ cP

Liquid Flashpoint: ☐ <73 F ☐ 73 to 99 F ☐ 100 to 139 F ☐ 140 to 200 F ☐ >200 F ☒ None

Boiling Point 212 Specific Gravity: _____ Total Halogens: _____ % Total Organic Carbon (TOC): _____ % VOC _____ %

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

(Please Note, no "Trade Names" "Proprietary Ingredients" "Formulas" or "Name Reagents" are acceptable). All TRI chemicals must be included.

Constituents	Min%	Max%	ppm	Constituents	Min%	Max%	ppm
Water	99	100					
Solids	0	1					

(If there are additional chemicals to be added, please list on Profile Continuation Page)

Does the Waste contain any of the following?

Metal Pieces: ☐ Yes ☒ No *If yes, Describe Metal:* _____

Nitrocellulose: ☐ Yes ☒ No *Metal Powder or Flake:* ☐ Yes ☒ No *Sharps:* ☐ Yes ☒ No

Isocyanates: ☐ Yes ☒ No *Asbestos: (If yes, must be double bagged and wetted)* ☐ Yes ☒ No

Reactive cyanide: (If yes, indicate level in ppm) ☐ Yes ☐ No _____ *Range of reactive cyanide*

Reactive sulfide: (If yes, indicate level in ppm) ☐ Yes ☐ No _____ *Range of reactive sulfide*

PCBs: ☒ *None* ☐ *0-49 ppm* ☐ *50-499 ppm* ☐ *500+ ppm* ***(If waste contains PCBs, certification form is required)***

Does this Waste contain Benzene subject to Subpart FF Regulations? ☐ Yes

If waste contains benzene, it may be subject to Benzene Neshap rules. Please complete and submit Tradebe's Benzene NESHAP form.

WASTE WATER ANALYSIS

Profile # _____

For waste streams being managed through TTR NE's wastewater treatment operations only:

Phases: Oil 0 % Water 100 % Interface 0 % Sediments 0 % DNAPL 0 %

Petroleum Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level
PCB			Copper			Cobalt		
Halogens			Cadmium		ND	Mercury		ND
Solvents			Chromium		ND	Arsenic		ND
Arsenic		ND	Lead		ND	Barium		
Cadmium		ND	Nickel		ND	Sulfides		
Chromium		ND	Silver			Cyanides		0.34
Lead		ND	Zinc			Phenols		
			COD			Glycols		
			Iron			Selenium		ND

List Specific Solvents: _____

E. OTHER WASTE STREAM INFORMATION:

Is this waste a USED OIL per 40CFR PART 279? ☐ Yes ☒ No

If Yes, does the total halogen content exceed 1,000 ppm? ☐ Yes ☐ No

If Yes, can you identify the Chlorinated Constituent present in the oil? ☐ Yes ☐ No

If Yes, can you rebut the presumption that this material is a Hazardous Waste? ☐ Yes ☐ No

Is the Waste subject to RCRA 40 CFR 264 & 265 Subpart CC controls (Are Volatile Organic Compounds >500 PPM)? ☐ Yes

Does this waste contain any Hazardous Air Pollutants? (If so, Please list in Section D, Chemical Compostion) ☐ Yes

Does the Waste contain any Class I or Class II ozone-depleting substances? ☐ Yes

Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65? ☐ Yes

If yes list in Additional Information on Continuation Page.

Does this waste contain any Chemicals of Interest listed in *6 CFR Part 27 Appendix A* (Department of Homeland Security)? *If yes please list in Additional Information on Continuation Page.* ☐ Yes

F. RCRA CHARACTERIZATION:

Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? ☐ Yes ☒ No

Is this a Universal Waste per 40 CFR part 273? ☐ Yes ☒ No

Does treatment of this waste generate a F006 or F019 sludge? ☐ Yes ☒ No

Please list all characteristic codes (D001-D043): _____

Does the waste contain UHCs above treatment standards levels? (40 CFR 268.48, 268.7) ☐ Yes ☒ No

(Please provide UHC(s) Chemical Compostion (Section D)

Please list any applicable "F" Codes: _____

Please list any applicable "K" Codes: _____

Please list any applicable "U" codes: _____

Please list any applicable "P" codes: _____

Please list any state regulated codes _____

G. SHIPPING VOLUME & FREQUENCY:

☒ Bulk Liquid (tanker) 20,000 Gallons ☐ Bulk Solids(roll-off box, vacuum box, etc) ☐ Unibin/Flobin

☐ Cubic Yard Boxes ☐ Totes ☐ size in gallons ☐ Metal ☐ Plastic in Metal Cage

☐ Skid/Pallet ☐ Other *(If other*, please describe): _____

☐ Drums (Specify size) ☐ 85 ☐ 55 ☐ 30 ☐ 15 ☐ 5 ☐ Metal ☐ Plastic ☐ Fiberboard

Is waste a combination package (e.g. Drum w/ inner containers or skid w/ cases of consumer products) ☐ Yes ☒ No

Shipping Frequency: Number of Units ☐ Per ☐ Month ☐ Quarter ☐ Year ☐ One time

H. DOT SHIPPING INFORMATION

Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☐ Yes ☒ No

Shipping Name per 49 CFR 172.101 Hazardous Materials Table: _____

Primary Hazard Class or Division: _____ UN/NA #: _____ Packing Group: ☐ I ☐ II ☐ III

Secondary Hazard Class or Division: _____ ERG #: _____

Technical descriptors if required: _____ RQ if required: _____

DOT Special Permit that may apply (*Include copy of permit*): _____ Inhalation Hazard: Zone _____

I. GENERATOR CERTIFICATION:

"My authorized signature certifies the information contained in the Profile and the attached is complete and accurate, so that are no omissions of characteristics, composition or properties existing and all known or suspected hazards have been disclosed and that all shipments/samples referencing the profile number assigned to the waste stream described herein shall in all respects be consistent with the description. I further certify that I will notify Tradebe by email/letter of any characterization/chemical/process changes to the waste stream contained in this Profile prior to shipping". If signature is not by the Generator it is by the Generators authorized agent..

Name (print): For NYSEG: John J. Ruspantini Title: Senior Project Manager

Signature:  Date: 9-9-19

TRADEBE
Environmental Services, LLC ™

TRADEBE TREATMENT AND RECYCLING, LLC

Profile # _____

GENERATOR WASTE STREAM PROFILE ADDITIONAL INFORMATION SHEET

PLEASE PRINT IN INK OR TYPE

Site Address (if different from generator):

Site Name (if different from generator): _____

Pick-up Address: _____

Additional Location Identification: _____

City: _____ State: ____ Zip: _____

Contact Name: _____

Contact Phone: _____

Contact Fax: _____

Generator USEPA/Federal ID # (if different than generators) : _____

Facility Restrictions (if any): _____

B. WASTE STREAM INFORMATION CONTINUATION

Exemption: The waste described on this profile sheet is exempt/excluded from RCRA regulation under:

(Cite regulation exempting waste from RCRA) _____

D. CHEMICAL COMPOSITION CONTINUATION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max%	ppm	Constituents	Min%	Max%	ppm

G. R.C.R.A. CHARACTERIZATION CONTINUATION:

Additional characteristic codes (D001-D043): If waste carries a characteristic code, please check all applicable Underlying Hazardous Constituents in Appendix I: _____

List additional F or K codes: _____

List additional U or P codes:

Additional State codes if required: _____

ADDITIONAL INFORMATION

(Use this space to include any other information about this waste)

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 12/24/2018

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.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Willis of Illinois, Inc. c/o 26 Century Blvd P.O. Box 305191 Nashville, TN 372305191 USA	CONTACT NAME: Willis Towers Watson Certificate Center PHONE (A/C, No, Ext): 1-877-945-7378 FAX (A/C, No): 1-888-467-2378 E-MAIL ADDRESS: certificates@willis.com
INSURED Tradebe Treatment and Recycling of Bridgeport, LLC 50 Cross St. Bridgeport, CT 06610 USA	INSURER(S) AFFORDING COVERAGE — NAIC # INSURER A : Indian Harbor Insurance Company — 36940 INSURER B : Zurich American Insurance Company — 16535 INSURER C : American Zurich Insurance Company — 40142 INSURER D : INSURER E : INSURER F :

COVERAGES **CERTIFICATE NUMBER:** W9620670 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	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:			US00077228LI18A	12/31/2018	12/31/2019	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG	$ 2,000,000 $ 300,000 $ 10,000 $ 2,000,000 $ 2,000,000 $ 2,000,000
B	AUTOMOBILE LIABILITY [X] ANY AUTO [ ] OWNED AUTOS ONLY [ ] SCHEDULED AUTOS [ ] HIRED AUTOS ONLY [ ] NON-OWNED AUTOS ONLY			BAP1155419 00	12/31/2018	12/31/2019	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	$ 2,000,000 $ $ $
A	[X] UMBRELLA LIAB [X] OCCUR EXCESS LIAB [ ] CLAIMS-MADE DED [X] RETENTION $ 10,000			US00077229LI18A	12/31/2018	12/31/2019	EACH OCCURRENCE AGGREGATE	$ 14,000,000 $ 14,000,000
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANYPROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y / N: No (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N / A		WC 5447991 05	12/31/2018	12/31/2019	[X] PER STATUTE [ ] OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	$ 1,000,000 $ 1,000,000 $ 1,000,000
B	Workers Compensation & Employers Liability Work Comp: Per Statute			WC 0503182 01	12/31/2018	12/31/2019	E.L. Each Accident E.L. Disease-Each Emp E.L. Disease-Pol Lmt	$1,000,000 $1,000,000 $1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

SEE ATTACHED

CERTIFICATE HOLDER

Sample

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Andrea Paris

AGENCY CUSTOMER ID: _____

LOC #: _____

ADDITIONAL REMARKS SCHEDULE

AGENCY		NAMED INSURED
Willis of Illinois, Inc.		Tradebe Treatment and Recycling of Bridgeport, LLC 50 Cross St. Bridgeport, CT 06610 USA
POLICY NUMBER See Page 1		
CARRIER See Page 1	NAIC CODE See Page 1	EFFECTIVE DATE: See Page 1

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,

FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

INSURER AFFORDING COVERAGE: Indian Harbor Insurance Company NAIC#: 36940
POLICY NUMBER: PEC004703902 EFF DATE: 04/01/2018 EXP DATE: 12/31/2019

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Contractor's Pollution Liability &	Each Occurrence	$15,000,000
Professional Liab.-Claims Made	Aggregate	$15,000,000

INSURER AFFORDING COVERAGE: Indian Harbor Insurance Company NAIC#: 36940
POLICY NUMBER: PEC0045637 EFF DATE: 04/01/2015 EXP DATE: 12/31/2019

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Site Pollution Liability	Occurrence	$5,000,000
Claims Made - Covers IN, TN	Aggregate	$20,000,000

INSURER AFFORDING COVERAGE: Indian Harbor Insurance Company NAIC#: 36940
POLICY NUMBER: PEC0045639 EFF DATE: 04/01/2015 EXP DATE: 12/31/2019

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Site Pollution Liability	Each Loss	$10,000,000
Claims Made - Covers CT, MA, NY	Aggregate	$30,000,000

INSURER AFFORDING COVERAGE: Indian Harbor Insurance Company NAIC#: 36940
POLICY NUMBER: PEC000096406 EFF DATE: 04/01/2016 EXP DATE: 12/31/2019

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Site Pollution Liability	Each Poll. Condition	$2,000,000
Claims Made - Non RCRA Locations	Aggregate	$2,000,000

ADDITIONAL REMARKS:
Non-Owned Disposal Site
$5,000,000/ $10,000,000

Third Party Transportation
$5,000,000/ $10,000,000

SR ID: 17287103 BATCH: 1000423 CERT: W9620670

Additional Named Insureds:

Tradebe GP

Tradebe Capital Corporation

Tradebe Environmental Services, LLC

Tradebe Treatment and Recycling of Tennessee LLC

Tradebe Industrial Services, LLC

Tradebe Onsite Services, LLC

Thunderbird Trucking LLC

Tradebe Treatment and Recycling LLC

Tradebe Treatment and Recycling Northeast, LLC

Tradebe Treatment and Recycling of Bridgeport, LLC

Tradebe Treatment and Recycling of Northborough, LLC

Tradebe Treatment and Recycling of Stoughton, LLC

Norlite, LLC

Bridgeport Analytical Laboratory, LLC

F.O.G. Services, LLC

Tradebe Transportation, LLC

United Industrial Services, Inc.

Compliance Associates, LLC

First Response, a Tradebe Company

Tradebe Treatment and Recycling of Wisconsin, LLC

Tradebe Treatment and Recycling of Nashville, LLC

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
CESQG9999999	1	8448738723	2145007

GENERATOR

5. Generator's Name and Mailing Address
NYSEG - TRACEY BLAZICEK
18 LINK DRIVE
BINGHAMTON,NY 13904
Generator's Phone:

Generator's Site Address (if different than mailing address)
NYSEG
150 WATER STREET
PENN YAN,NY 14527

6. Transporter 1 Company Name
TRADEBE TRANSPORTATION, LLC
U.S. EPA ID Number
CTD021816889

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
TRADEBE T&R NORTHEAST, LLC
136 GRACEY AVENUE
MERIDEN,CT 06451
Facility's Phone: 203-238-6745
U.S. EPA ID Number
CTD021816889

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1.	NON DOT / NON RCRA REGULATED MATERIAL	1	TT		G	
2.						
3.						
4.						

13. Special Handling Instructions and Additional Information
001) ERG 1000232224 SO: 2145007

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name | Signature | Month Day Year

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name | Signature | Month Day Year

Transporter 2 Printed/Typed Name | Signature | Month Day Year

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name | Signature | Month Day Year

Increase RIDER

BOND AMOUNT: $527,557.05 **BOND NO. K08538499** **PREMIUM $7,773.00**

To be attached and form a part of Bond No.: K08538499 dated the 5th day of April, 2013, executed by Westchester Fire Insurance Company as surety, on behalf of Tradebe Treatment and Recycling of Bridgeport, LLC as current principal of record, and in favor of Commissioner of Energy and Environmental Protection, as Obligee, and in the amount of Five Hundred Twenty Seven Thousand Five Hundred Fifty Seven Dollars and 05/100 ($527,557.05).

In consideration of the agreed premium charged for this bond, it is understood and agreed that Westchester Fire Insurance Company hereby consents that effective from the 29th day of November, 2018, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE Increased:

FROM: Five Hundred Twenty Seven Thousand Five Hundred Fifty Seven Dollars and 05/100 ($527,557.05)

TO: Five Hundred Twenty Eight Thousand Seventy Five Dollars and 28/100 ($528,075.28)

The Increase of said bond penalty shall be effective as of the 29th day of November, 2018, and does hereby agree that the continuity of protection under said bond subject to changes in penalty shall not be impaired hereby, provided that the aggregate liability of the above mentioned bond shall not exceed the amount of liability assumed by it at the time the act and/or acts of default were committed and in no event shall such liability be cumulative.

Signed, sealed and dated this 29th day of November, 2018.

Tradebe Treatment and Recycling of Bridgeport, LLC
PRINCIPAL

BY: _____

Westchester Fire Insurance Company
SURETY

BY: _____
Mark Benton, ATTORNEY-IN-FACT

THE ABOVE BOND IS HEREBY AGREED TO AND ACCEPTED BY:

Commissioner of Energy and Environmental Protection
OBLIGEE

BY: _____
TITLE

CHUBB

Power of Attorney

Westchester Fire Insurance Company | ACE American Insurance Company

Know All by These Presents, that **WESTCHESTER FIRE INSURANCE COMPANY** and **ACE AMERICAN INSURANCE COMPANY** corporations of the Commonwealth of Pennsylvania, do each hereby constitute and appoint Sarah Marusak and Jane Katherine Schnoor of Grand Rapids, Michigan; Mark Benton, Denice Payton and Melanie Watts of Southfield, Michigan----------

each as their true and lawful Attorney-in-Fact to execute under such designation in their names and to affix their corporate seals to and deliver for and on their behalf as surety thereon or otherwise, bonds and undertakings and other writings obligatory in the nature thereof (other than bail bonds) given or executed in the course of business, and any instruments amending or altering the same, and consents to the modification or alteration of any instrument referred to in said bonds or obligations.

In Witness Whereof, WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY have each executed and attested these presents and affixed their corporate seals on this 1st day of **November, 2018.**

Dawn M. Chloros, Assistant Secretary

Stephen M. Haney, Vice President

STATE OF NEW JERSEY

County of Hunterdon ss.

On this 1st day of **November, 2018,** before me, a Notary Public of New Jersey, personally came Dawn M. Chloros, to me known to be Assistant Secretary of WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY, the companies which executed the foregoing Power of Attorney, and the said Dawn M. Chloros, being by me duly sworn, did depose and say that she is Assistant Secretary of WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY and knows the corporate seals thereof, that the seals affixed to the foregoing Power of Attorney are such corporate seals and were thereto affixed by authority of said Companies; and that she signed said Power of Attorney as Assistant Secretary of said Companies by like authority; and that she is acquainted with Stephen M. Haney, and knows him to be Vice President of said Companies; and that the signature of Stephen M. Haney, subscribed to said Power of Attorney is in the genuine handwriting of Stephen M. Haney, and was thereto subscribed by authority of said Companies and in deponent's presence.

Notarial Seal

KATHERINE J. ADELAAR
NOTARY PUBLIC OF NEW JERSEY
No. 2316885
Commission Expires July 16, 2019

Notary Public

CERTIFICATION

Resolutions adopted by the Boards of Directors of WESTCHESTER FIRE INSURANCE COMPANY on December 11, 2006 ; ACE AMERICAN INSURANCE COMPANY on March 20, 2009:

"RESOLVED, that the following authorizations relate to the execution, for and on behalf of the Company, of bonds, undertakings, recognizances, contracts and other written commitments of the Company entered into in the ordinary course of business (each a "Written Commitment"):

(1) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise.

(2) Each duly appointed attorney-in-fact of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise, to the extent that such action is authorized by the grant of powers provided for in such person's written appointment as such attorney-in-fact.

(3) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to appoint in writing any person the attorney-in-fact of the Company with full power and authority to execute, for and on behalf of the Company, under the seal of the Company or otherwise, such Written Commitments of the Company as may be specified in such written appointment, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.

(4) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to delegate in writing to any other officer of the Company the authority to execute, for and on behalf of the Company, under the Company's seal or otherwise, such Written Commitments of the Company as are specified in such written delegation, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.

(5) The signature of any officer or other person executing any Written Commitment or appointment or delegation pursuant to this Resolution, and the seal of the Company, may be affixed by facsimile on such Written Commitment or written appointment or delegation.

FURTHER RESOLVED, that the foregoing Resolution shall not be deemed to be an exclusive statement of the powers and authority of officers, employees and other persons to act for and on behalf of the Company, and such Resolution shall not limit or otherwise affect the exercise of any such power or authority otherwise validly granted or vested."

I, Dawn M. Chloros, Assistant Secretary of WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY (the "Companies") do hereby certify that

(i) the foregoing Resolutions adopted by the Board of Directors of the Companies are true, correct and in full force and effect,
(ii) the foregoing Power of Attorney is true, correct and in full force and effect.

Given under my hand and seals of said Companies at Whitehouse Station, NJ, this 29th day of November, 2018

Dawn M. Chloros, Assistant Secretary

IN THE EVENT YOU WISH TO VERIFY THE AUTHENTICITY OF THIS BOND OR NOTIFY US OF ANY OTHER MATTER, PLEASE CONTACT US AT:
Telephone (908) 903-3493 Fax (908) 903-3656 e-mail: surety@chubb.com