STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 23, 1981

RECEIVED
DEC 30 1981
BOVANO IND. INC.

Mr. David Flood
Bovano of Cheshire
830 South Main Street
Cheshire, Connecticut 06410

Dear Mr. Flood:

Enclosed for your review and information is a copy of the report of our inspection of Bovano of Cheshire made on December 14, 1981. The items checked on this report indicate operational deficiencies and require corrective action.

If you should have any questions or comments after reviewing the enclosure, please contact Joseph Faryniarz at 566-4869.

Sincerely,

Patrick F. Bowe
Senior Environmental Analyst
Hazardous Waste Management Section

PFB:JAF:et
Enclosure

RDMS Doc ID 106764

Site ID # CTD001179316

Part A Application Yes ✓ No ____

RCRA INSPECTION CHECKLIST

Site Name: Bovano of Chesire

Site Location: 830 S. Main St. Chesire

Phone No: ( ) ____

Inspectors:

EPA: ____

State: Paul Hassler

Industry: ____

Inspection Date: 12/14/81

Type of Facility: ____

Generator: ✓ (small quan.?)

Transporter: ____

TSD: ✓ (UIC)

Permits Issued: ____

In Compliance Yes ____ No ____

I. Generator with Temp. Storage or TSD Facility

Likely to be small quantity.

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.) Est. 1954

Employ 53 on 2 shifts. Private well water & sanitary septic system. Manufacture glass enamel coatings on copper objects - ornamental objects. Processes include pickling (H_2SO_4), solvent cleaning (trichloroethylene), enamel (glass "dust") sprinkled on, then baked on (4 batch ovens).

also nitric acid

see pg. 11

UIC covers a dug-out pit (6x8ft. x 6ft. deep), walls of concrete block with limestone floor. Located immediately outside the building housing the treatment holding tank, and receives sludge generated from this tank - currently approx. one inch of CuOH sludge in pit. Pit is covered manually. Have state 25-54i permit for treated effluent discharge. May have Air Comp. permit for ventilation system over copper pickling tanks, with scrubber rinse down going to treatment tank. Treatment is done indoors in above-ground septic tank, use NaOH dry flake.

2. Hazardous Waste Profile

Type of Waste	Amt. of Waste kg/mo	Onsite Temp. Storage/ TSD	Transporter	Offsite TSD

1) CuOH sludge; under 10 lbs/mo.; to lined pit; have ~~2~~ 6-yr. accumulation which appears less than 10 ft.² (no depth measurement taken).

2) waste trichloroethylene; 100 lbs./mo.; drums outdoors; Hubbard-Hall. Claim 1980 total solvent usage was 1200 lbs. (EPA notification states 3000 lbs)

3) sulfuric + nitric acids from pickling tanks (small tanks, series of 5) going into treatment tank: total 1500 gal./year. Neutralized with NaOH dry flake: 60 lbs/week. Treatment tank also receives scrubber rinse (volume?)

No waste oils. Appear to be small quantity generator, but are filed as TSDF for borderline UIC (pit is as wide as it is deep).

3. Records

262.21 a.) Manifest — Manifests may be checked ahead of time by state personnel who have them on file - otherwise, random selection of some during inspection for review. Must be kept for 3 years.

this is the only 1981 shipment, currently have on-site 1000 lbs. waste trichlor accumulated since 2/81. Will use Ct. manifests henceforth.

1) Document No.: Hubbard Hall manifest CTHH 3305

2) Generator ID, name, address: CTD001179316 Bovano of Chesire Chesire

3) Transporter(s) ID, name, address: CTD055452637 Hubbard Hall Chem. Co. Waterbury

4) TSD Facility ID, name, address: MAD053452637 Recycling Industries Braintree, MA.

5) Waste Type of Quantity: 1000 lbs. (2 drums) waste trichloroethylene mixed with oil.

6) Date of Acceptance: 2/12/81

262.50 i) International Shipping Manifest: —

262.42 ii) Exception Report: —

265.13 b.) Waste Analysis Plan NONE

1. Plan on site: NO

2. Plan should include (a) parameters: _____

(b) test methods: _____

(c) sampling method: _____

(d) frequency: _____

3. Copy of Results _____

265.15 c.) Inspection Schedule and log NONE, given suggested format and told to amend, pending possible status as small quantity generator.

1) Are inspections conducted _____

2) *Written inspection schedule _____

3) Inspection Log _____

(A) Daily - loading and unloading of areas subject to spills: _____
- discharge control equipment in tanks: _____
- incinerator system, thermal treatment equilpment,
- chem/phys/biol treatment equipment: _____
- freeboard level of surface impoundments: _____

(B) Weekly - physical conditions of containers: _____
- " tanks: _____
- " surface impoundments: _____
- " chem/phys/bio. treatment facility: _____

265.16 *d.) Personnel Training Records NONE.

1.) Job titles/position descriptions and name of employee

_____

_____

2.) Description of training: _____

3.) Records of Training: _____

4.) Training completed: _____

* Required for Temporary Storage

e.) Contingency Plan NONE

265.53 1. Plan on site: _____

265.53 2. Plan to local authorities: _____

265.52 3. Content of Plan: _____

a) Emergency plan: _____

b) Local authority arrangements: _____

c) Identify emergency coordinator: _____

d) List of emergency plans: _____

e) Evacuation plans: _____

f.) Closure and Post-closure Plans; Cost Estimates

265.112, .113, .114, .115 1. Closure Plan (TSD Facilities) - NONE

a) Plan on site:

b) Does plan include:

1) Schedule of partial closure if applicable: _____

2) Estimate of maximum inventory of waste in storage or treatment at given time: _____

3) Schedule for final closure & an estimate of the expected year of closure: _____

4) Description of steps needed to decontaminate facility equipment: _____

5) Total time required for closure: _____

6) Certification of closure: _____

265.117, .118 2. Post-closure Plan (disposal facilities only) NONE

a) Plan on site: _____

b) Does plan identify and include frequency of: _____

o planned ground water monitoring: _____
o planned maintenance & security activities: _____
o name, address and phone number of Post-closure contact: _____

c) Length of Post-closure period identified: _____

* Required for Temporary Storage

265.142 3. Closure Cost Estimate (TSD facilities)

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Closure Plan changed?

d) If answer to 3 is yes, has cost estimate changed?

265.144 4. Post-closure Cost Estimate (disposal facilities only)

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Post-closure plan changed?

d) If answer to 3 is yes, has cost estimate changed?

265.73 ✓ g) Operating Records NONE

1. Records on site _____

2. Description, quantity, method and dates of disposal: _____

_____

3. Location onsite and manifest number: _____

_____

4. Results of waste analysis: _____

5. Record of any incidents requiring use of contingency plan: ____

_____

6. Records and results of inspections: _____

7. Closure and post-closure cost estimates if needed: _____

B. Inspection

265.14 1. Site Security

a) 24 hour surveillance system: burglar alarm

✓ b) or Artificial or natural barrier: no

✓ or and Means to control entry: building locked, drums accessible.

✓ d) Danger sign posted at each entrance legible at 25': NO

265.30-.37 **2. Site Preparedness/Prevention

a) Internal communication/alarm: yes

b) Telephone/2-way radio: yes

c) Portable fire control equipment: yes

d) Adequate water for fire control: well water

e) Testing and Maintenance of equipment: —

f) Adequate aisle spare: yes

g) Access to equipment: yes

265,170-.177 3. Containers OK

Leaks NO

Ruptures NO

Corrosion NO

Closed Except in use

Heat/Pressure NO

50' bufferzone for I and R wastes: N/A

I = Ignitable ; R = Reactive

No smoking signs near I or R waste

Separation of incompatible wastes —

Evidence of spills NO

262.30-.34 Pretransport requirements: packaging

labelling need labels

marking OK

placarding

Date of Waste Accumulation —

*NYR Check for impermeable base under containers, any drains, secondary containment

*NYR - Not yet regulated
**Required for Temporary Storage

265.190-.199 4. Tanks Treatment tank is a 6 ft. septic tank, manual treatment (batches).

Leaks NO

Ruptures NO

Corrosion: Check valves, piping controls for signs of corrosion NO

≥ 2' freeboard or containment YES

Heat/pressure NO

Evidence of spills NO

Inflow and outflow controls ?

Continuous Inflow _____ Means to stop flow? _____

Special Requirements for I and R wastes N/A

265.220-.230 5. Surface Impoundments (Pits, Ponds and lagoons) UIC may be waste pit instead.

Protective Cover on Dikes YES

≥ 2' freeboard YES

Special requirements for I and R waste N/A

Evidence of fire, explosion - leak NO

*NYR Liner claim one foot of limestone rock.

265.90-.94 **Groundwater Monitoring NO

265.250-.257 6. Waste Piles N/A

Wind erosion control _____

**Prevention of leachate from pile (if hazardous) _____

Special requirements for I and R waste _____

Evidence of fire, explosion, leak _____

Separation of incompatible wastes _____

Waste analysis _____

*NYR - Not yet regulated

**November 19, 1981

265.340
265.382

7. Incinerators/Thermal Treatment N/A

a) Steady State conditions _____

b) Inspect combustion and emission control instruments every 15 minutes _____

c) Observe stack plume hourly _____

d) Waste analysis:

1) Heating value of waste _____

2) Organic halogen content _____

3) Sulfur content _____

4) Lead concentrations _____

5) Mercury concentrations _____

e) Evidence of leaks of spills (pumps, valves, conveyors and pipes) _____

f) Daily Inspection of Emergency shutdown controls and Alarm systems _____

g) Special Requirements for incompatible wastes _____

265.272 -
265.282

8. Phys/Chem/Bio. Treatment N/A (see Tanks previous page).

a) Leaks _____

b) Ruptures _____

c) Corrosion _____

d) Waste cut off _____

e) Waste analysis _____

f) Special Requirements for I and R waste _____

g) Special Requirements for incompatible wastes _____

265.272 - 265.282 9. Land Treatment N/A

a) Approval document _____

*b) Run-on diversion _____

*c) Run-off collection; Treat if necessary _____

d) Waste Analysis _____

e) Presence of food chain crops, if so, refer to 265.276 _____

f) Unsaturated zone monitoring plan _____

g) Unsaturated zone waste analysis _____

h) Records of application dates, rates, quantities and location of waste _____

i) Special requirements for I and R wastes _____

j) Special requirements for incompatible wastes _____

265.90-.94 *k) Groundwater Monitoring _____

265.302-.315 10. Landfills N/A

*a) Run-on diversion _____

*b) Run-off collection; Treat if necessary _____

c) Wind dispersion controlled _____

d) Records of all dimensions, locations, and contents _____

e) Special Requirements for I and R wastes _____

f) Special Requirements for Incompatible Wastes _____

*g) Special Requirements for liquids _____

*h) Reduction in volume of empty containers _____

265.90-.94 *i) Groundwater Monitoring _____

Subpart R 11. Underground Injection have a waste pit that is filed as UIC, contains small quantity of solid CuOH sludge.

Consult appropriate subparts.

*November 19, 1981

C. Requests for Information

Told to contact EPA for clarification as small quantity generator, although UIC is borderline. Gave out suggested formats for contingency plan, personnel training records and inspection log.

D. Photos Taken

NONE

E. Sampling Inspection Needed

None, although the scrubber rinse volume is unknown (Air Comp. permits). Groundwater monitoring may be desired for the waste pit, pending determination of small quantity gen. status.

F. Potential for Imminent Hazard, Air, or Water Discharge Violations

None apparent; waste drums are stored outdoors on loading dock, no warning signs posted, drums need labelling but are marked. May desire groundwater monitoring at waste pit, but discharged volumes are small + neutralized.

G. Proximity to Residential Area, Surface Water, Recharge Zone, etc.

Area commercial, some businesses + stores + homes along South Main Street, Cheshire. Area wooded + lightly residential immediately behind Bovano (North + East of company). No surface water immediately visible.

H. Additional Notes or Comments:

UIC notification covers the treated effluent discharged to a waste pit (6ft. x 6ft. x 8ft.), where a small quantity of CuOH collects on the bottom (limestone rock bottom). State 25-54i permits this discharge, and since it seeps out of a shallow ground pit rather than to a sewer or septic system, it is defined as UIC. This appears to be the only reason this facility is listed as a TSDF, as their total waste quantity is less than 1000 kg/mo. Because of their small quantity, and because the waste pit is permitted by state Water Comp. under 25-54i, and because the pit is physically suitable as a pit rather than UIC (width + depth the same), the company may be exempt from RCRA. This must be determined by EPA.