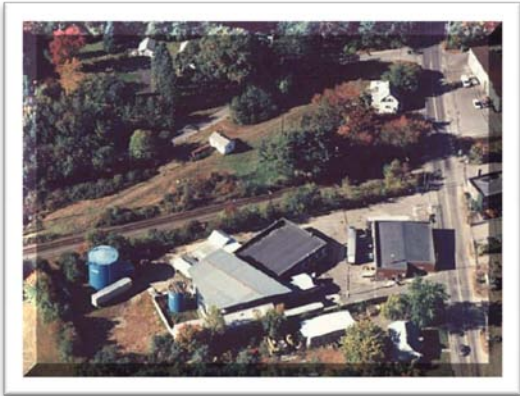


# 2012 Facility Audit

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# History



In May 2000, **GCC** joined the Clean Venture/Cycle Chem family of waste management companies headquartered in Elizabeth, NJ. Together with its affiliates, **GCC** offers comprehensive environmental services to companies throughout the Northeast and Mid-Atlantic States, through its fully permitted RCRA TSD in Framingham, MA.

General Chemical Corporation (**GCC**) began operating in 1960, and soon became the largest distributor/reclaimer of chlorinated and fluorinated solvents in the northeast.

Over the years the company has undertaken a purposeful and methodical transition into waste management and environmental services. Waste management services include hazardous waste characterization, transportation, storage and disposal. Hazardous waste which **GCC** is licensed to handle include: halogenated and chlorinated solvents, oil and oil contaminated debris, PCBs (limited quantities), wastewater treatment sludges, acids and alkalines, metal-bearing wastes, and pesticides.

**GCC** also handles used fuel oils for recycling, universal wastes and certain non-hazardous wastes that are not suitable for disposal with regular solid waste.

# Services

## **Treatment/Storage/Disposal**

General Chemical Corporation is permitted to dispose of toxic and hazardous waste, meeting the stringent TSDF Part "B" requirements as fully licensed Treatment, Storage and Disposal facilities. We adhere to the most demanding environmental codes in the nation. This assures that no matter what material we handle for you, your waste disposal program will be in full compliance with all state and federal regulations.

## **Turnkey Waste Disposal Programs**

Our technical staff supports your team to help design a program that is efficient and cost effective for your company. We assist you with all required paperwork, container labeling compliance, cost cutting through segregation and bulk packing, hazardous waste transport, evaluating final disposal methods, providing certificates of disposal, and computerized detail that supports your biannual hazardous waste reporting.

## **Transportation Services**

We maintain a complete fleet of specialized vehicles to transport toxic and hazardous waste. Our drivers and technicians are fully trained and certified in the handling of all materials that are transported.

## **Quality Control and Quality Assurance**

As a hazardous waste generator, your company has "cradle to grave" responsibility. We also share in this responsibility for all materials we handle. Our computerized tracking system, the issuance of certificates of disposal, our certified laboratory and annual reporting services provide the quality control and quality assurance we both require.

## **Storage and Re-Packing**

Hazardous materials collected by us are transported to our conveniently located TSDF in Framingham, MA, . When hazardous materials arrive, they are moved immediately into an appropriate process area. Small volumes are combined or blended, as appropriate, with large volumes to achieve a savings which we pass on to you.

### **Innovative Recycling and Disposal**

GCC has carefully selected the final treatment and disposal facilities used. All are in complete compliance with Federal and State regulations. For an added measure of protection, GCC perform environmental, financial and insurance audits of all disposal facilities to assure complete compliance. Based on the materials involved, you may have a choice of disposal methods. We will advise you about treatment, recycling, incineration, and energy recovery, as well as any new technologies as soon as they become available. Our continuous efforts to identify new, more cost effective methods save you time and assure you of the best low cost options for disposal.

### **Cost Effective**

By providing complete transport, storage, re-packing and disposal services, we are able to offer you the most cost effective disposal solutions. Unlike our competitors who have to subcontract with third parties, we handle every aspect of your disposal program directly.

### **Analytical Service**

If you are unable to provide a Material Profile Sheet (MPS) for the material involved, we will perform analysis to determine the composition. Based on the analysis in conjunction with your knowledge of the material, an MPS is generated. The treatment and the final disposal or recycling method is then determined.

### **Wide Range of Analysis**

Ground, surface and waste water analyses  
Soils, sludges, sediment analysis  
RCRA characteristic testing  
Waste compatibility testing  
Field sample characterization testing  
TCLP metals testing  
Disposal analysis  
Leachate analysis  
Solvent compatibilities and assaying

### **Precision Analytical Capabilities**

Total Organic Carbon Analyzing  
Gas Chromatography  
Karl Fischer Titration  
Atomic Absorption Spectrometry  
FTIR ·UV-Vis Spectrophotometry  
Bomb Calorimetry  
Auto Flash Point Testing  
Orion 920A pH Test Metering  
Analytical and Top Loading Weighing



**GENERAL CHEMICAL CORPORATION – FRAMINGHAM, MA**  
**FACILITY AUDIT**

**Date of Audit:**

January 2012

**Name/Title of Auditor:**

Roy Swartz/Manager of Regulatory Compliance

**Name of Facility:**

General Chemical Corporation

**Facility Address:**

133 Leland Street

Framingham, MA 01702

**Facility Telephone #:**

(508) 872-5000

**Facility Contact Name/Title:**

Steve Ganley/General Manager

**Total acres occupied:**

1.75

**Number of employees:**

16

**Parent Company & Address:**

Trinity General Corp.

Same

**PERMIT INFORMATION**

**EPA ID Number:**

27B/2006, Expiration, August 2011 (extended during renewal process)

**Does the facility have a Part "B" permit? If yes, when was it granted? If no, has it been applied for and when?**

1986, Initial Issuance

**Please list other permit type(s) and number(s):**

None

**Permitted treatment activities at this site:**

Used oil fuel recycling

**Waste types/EPA waste codes acceptable:**

All federal and Massachusetts State wastes except ignitables and reactives (D001 and D003). Some restrictions apply.

**Waste types/EPA waste codes not acceptable:**

The facility does not accept radioactive, biological, ignitable or reactive wastes.

**Total storage allowed:**

Tanks 37,000 G; Containers 22,000 G (Hazardous Waste)

**Restrictions on amount of waste accepted or processed:**

None

## **FACILITY HISTORY**

### ***Previous site owner(s) and site use(s):***

*The site was operated by Gulf Oil from the 1920's – 1958 as a gasoline and fuel oil terminal. Trinity Oil began operating as a home heating oil distributor in 1958, and General Chemical was formed in 1960.*

### ***How long has the facility been operating at this site?***

*51 Years*

### ***Did the facility ever operate at another site?***

*No*

## **FACILITY CONSTRUCTION**

### ***Please describe the following, including the number and capacity of each and secondary containments systems: Drum storage area(s):***

*Two totally enclosed buildings with impervious floors and berms. Total licensed hazardous waste container capacity – 22,000 gallons.*

### ***Waste/product storage tanks:***

*Five above ground cylindrical steel tanks within concrete containment structure coated with impermeable polymer. Total – 37,000 gallons of hazardous waste.*

### ***Waste treatment units:***

*None*

### ***Emergency equipment:***

*Spill boom, absorbents, shovels, brooms, overpacks, neutralizers, forktrucks, vacuum equipment and pumps.*

### ***What types of fire fighting equipment is available on site?***

*Waste storage buildings are protected by foam fire suppression system. Other areas have sprinklers and/or portable extinguishers.*

### ***What types of spill response equipment is available at the site?***

*See above.*

### ***Are there groundwater monitoring wells on site? If yes, how many, how often are they tested and what tests are run?***

*Yes, approximately 20 wells are monitored semiannually for volatile organic compounds.*

### ***Are there any plans for expansion? If so, please describe:***

*No*

## **WASTE ANALYSIS PLAN**

**Are all incoming waste streams sampled? Are all individual drums sampled? Is compositing done? (If so, how many drums per composite)?**

With few exceptions (e.g., lab packs) every incoming container is sampled. A maximum of 10 containers of the same waste may be composited.

**What tests are run on incoming samples?**

A variety of testing regimens is utilized, depending upon the physical state and nature of the waste. Specific details are provided in the facility's Waste Analysis Plan.

**Is sampling and testing run before or after unloading waste?**

Before unloading for bulk liquids. Normally after unloading for others.

**How long are samples and waste analysis results retained?**

Samples are retained for a minimum of 30 days. Analysis results are retained indefinitely in both paper and electronic formats.

**What certifications does the facility lab hold? Does the laboratory do outside laboratory analyses or is it only for in-house waste analysis.**

The laboratory is designed to support the waste analysis needs of the facility. It is not certified and does not perform commercial analysis.

## **WASTE DISPOSAL PROCEDURES**

**Describe waste handling procedures from the arrival of waste at the facility to the ultimate disposal of waste.**

Bulkable wastes are consolidated in either roll off containers (solids) or tanks (liquids). All wastes are stored in secure impermeable areas until loaded for shipment.

**How are empty drums disposed?**

Steel drums are either crushed for recycling or sent for reconditioning. Plastic drums are sent to a plastics recycler.

**Describe internal waste tracking system:**

Each waste is profiled and computerized. Incoming containers are assigned unique numbers and bar code labels, which are used for scanning and inventory control.

**Are all outgoing waste shipments sampled? What parameters are tested?**

Outgoing bulk shipments are sampled and tested for compliance with the receiving facility's parameters and GCC's profile.

**What types of wastes are shipped off-site for disposal and to what facilities are they sent. How often are these facilities audited?**

All wastes are shipped off-site, to a variety of transfer, recycling, treatment or disposal facilities. These are audited prior to use and periodically thereafter.

## **TRAINING**

**What type of training is provided to employees? How often is it given and by whom?**

All required OSHA (40 hr. + annual refreshers), RCRA, and DOT (Hazmat) training is provided, by a combination of in-house and commercial trainers.

## **COMPLIANCE/ENVIRONMENTAL ISSUES**

**How often is this facility inspected by the EPA and/or state regulatory agencies?**

The Massachusetts DEP inspects, on a random basis, at least once per year. These are "multimedia" inspections covering all regulatory areas. EPA and DOT inspections occur less frequently.

**How often are internal compliance inspections performed and by whom?**

*The Compliance Manager and/or General Manager performs daily inspections in accordance with the facility license.*

**ENVIRONMENTAL RISKS**

**Population of local municipality:**

*75,000*

**Distance from nearest residential area:**

*General Chemical lies within an industrial/residential mixed area.*

**What bodies of water are within .5 mile of the facility?**

*Course Brook*

**Distance to drinking water supply?**

*Local municipality is served by town water supply.*

**Briefly describe post closure plans, including financial assurance for closure.**

*Closure funding is assured through a letter of credit. Post-closure is not applicable.*



# Safety & Health Program Summary

Cycle Chem, Inc. and General Chemical Corporation are committed to providing a safe workplace for their employees, serving their clients with utmost safety, and striving for a cleaner and safer environment. Consequently, all field and supervisory employees, including sales and administrative personnel, undergo comprehensive and continual health and safety training. For example, in accordance with 29 CFR 1910.120(e) - the training requirements of the OSHA

“HAZWOPER” standard, various employees of CVI and affiliated companies receive the following training:

- 40 Hour Initial HAZWOPER for general site workers
- 24 Hour Initial HAZWOPER for occasional site workers
- 8 Hour HAZWOPER Supervisor for site supervisors
- 8 Hour Annual HAZWOPER Refresher for all trained workers

Beyond 29 CFR 1910.120 (e), these employees also undergo other OSHA, U.S.DOT and NJ DEP required safety training relevant to our operations, including:

- Confined Space Entry
- Fire Safety
- Respiratory Protection
- Hazard Communication
- Lock-out/Tag-out
- Occupational exposure to blood-borne pathogens
- Occupational exposure to hazardous laboratory chemicals
- Competent persons in excavation
- Hazardous materials transportation HM-126F, HM-181, HM-215

Additionally, CCI & GCC have developed and implement a written Safety and Health Program, which includes among other requirements, safety and health Standard Operating Procedures {mandated by 29 CFR 1910.120(b)(ii)} enunciating corporate policies in the following areas of OSHA, EPA, U.S. DOT, and NJDEP occupational and environmental safety and health requirements pertinent to our operations:

OSHA General Industry Standards – 29 CFR 1910

- Walking-Working Surfaces: Fixed industrial stairs, Portable and Fixed ladders, Scaffolding – Subparts .24 to .30 CVI SOP # 980225
- Emergency Response Plans: Fire Prevention – Subpart .30 CVI SOP #980225

- Vehicle-mounted Work Platforms, Man-Lifts: - Subparts .67 to .68 CVI SOP# 980225
- Occupational Health & Environmental Controls: Occupational noise exposure and Ionizing radiation – Subparts .96 to .97 CVI SOP # 980225
- Hazardous Materials: Flammable and combustible liquids – Subpart .107 CVI SOP #851010
- Personal Protective Equipment: Eye and face protection, Respiratory protection, Head protection, Foot protection, Hand protection – Subparts .132 to .138 CVI SOP # 950429
- General Environmental Controls: Sanitation - Subpart .141, Permit required confined spaces – Subpart .146 and Control of hazardous energy Subpart .147 CVI SOP #'s 950201, 941213
- Fire Protection – Subparts .155 to .165 CVI SOP #950604
- Portable Tools and Equipment – Subpart .244 CVI SOP # 980226
- Electrical Work: Training - Subpart .322, Use of Equipment – Subpart .333 Safeguards for Personal Protection - Subpart .334
- Toxic and Hazardous Substances: – Air contaminants – Subpart .1000, Asbestos – Subpart .1001, Blood-borne pathogens – Subpart .1030, Hazard communication - Subpart .1200, Retention of DOT markings, placards and labels – Subpart .1201, Occupational exposure of hazardous chemicals in laboratories – Subpart .1450 CVI SOP #s950216, 950415, 950513, 950505PP, 950614 & 950615

#### OSHA Construction Standards – 29 CFR 1926

- Cranes, Derricks & Hoists: – Subpart N CVI SOP # 950101-C
- Fall Protection: Subparts .502, .503 CVI SOP #941214
- Excavation: Subpart P CVI SOP # 960501
- Motor Vehicles, Mechanized Equipment: Subparts .600 to .602 CVI SOP #950120
- Marine operations and equipment: Subpart .605 CVI SOP #95058
- Surface transportation of explosives: Subpart .902 CVI SOP #980225
- RCRA: 40 CFR 264, 265 (EPA)
- Transportation of hazardous materials: 40 CFR HM 171, 172.704 (US DOT)
- Drug and alcohol testing – 49 CFR 199 (US DOT)
- Closure of Underground storage tanks: NJ DEP

Finally, to assure company implementation of our strict employee compliance with these SOP's, the Corporate Safety and Health Officer conducts daily, random and unannounced job site audits. In addition, all CCI and GCC applicable employees participate in our Comprehensive Medical Surveillance Program.

**HAZARDOUS WASTE LICENSE**

**GENERAL CHEMICAL CORPORATION**

**133 LELAND STREET  
FRAMINGHAM, MA**

**EPA ID # MAD019371079**

**LICENSE # 27B/2006**