



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

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FACT SHEET

Tradebe Treatment and Recycling of Stoughton, LLC
441R Canton Street
Stoughton, MA 02072
EPA#MAD062179890

Hazardous Waste Facility License (renewal)

This Fact Sheet summarizes the content of the Draft Hazardous Waste Facility License (Draft License) prepared by the Department of Environmental Protection (Department) for Tradebe Treatment and Recycling of Stoughton, LLC (Tradebe) pursuant to M.G.L. c. 21C and 310 CMR 30.000. This application is for a license renewal and no major changes to the license are being proposed.

I. Purpose of the Licensing Process

The purpose of the licensing process is to afford the Department, the U.S. Environmental Protection Agency (EPA), local government, and citizens the opportunity to evaluate the ability of a license applicant to comply with the applicable hazardous waste management regulations promulgated under M.G.L. c. 21C and 310 CMR 30.000.

Facilities which treat, store and/or dispose of hazardous waste must be designed and safely operated to protect the people of Massachusetts from the dangers of improperly handled hazardous waste. Stringent licensing requirements are intended to ensure that those who accept hazardous waste are qualified to do so. Before issuance of any hazardous waste facility license, pursuant to M.G.L. c. 21C and 310 CMR 30.000, the Department is required to prepare a Draft License. The Draft License sets forth in one document all the applicable requirements that a licensee is required to comply with during the 5-year duration of the license. Tradebe is not proposing any storage increases or operational changes in this license renewal.

II. Procedures for Reaching a Final Decision

Massachusetts Hazardous Waste Regulation, 310 CMR 30.833, requires that MassDEP

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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provide a public notice of the Draft License and allow at least a forty-five (45) day public comment period. The public comment period for this Draft License will begin with publication of the public notice on August 3, 2018 and will end on September 16, 2018, 5 p.m. Any person interested in commenting on the Draft License must do so within this comment period. Submit comments electronically or in writing to:

Marrcus.Henry@state.ma.us

Massachusetts Department of Environmental Protection
Bureau of Air and Waste
Business Compliance Division
One Winter Street, 7th Floor
Boston, Massachusetts 02108
Attention: Marrcus Henry

MassDEP will schedule an informal public hearing on the proposed Draft License if, during the comment period, or within 15 days of the close of the comment period, MassDEP receives written notice requesting an informal public hearing, or if it determines on its own that there is significant public interest in the Draft License. Written and oral comments will be accepted at the hearing.

In making a final decision, MassDEP will consider all written comments received during the comment period, all verbal comments received at a public hearing, if held, and the requirements of the Massachusetts Hazardous Waste Regulations, 310 CMR 30.000. MassDEP will then make a final determination to issue or deny a hazardous waste facility license to the Facility.

MassDEP will give notice of its final license decision to the Facility and each person who has submitted written comments or has requested notice of the final license decision. A final license decision becomes effective 21 days after the date of the notice of the decision. The final license decision will be postponed if a request for an adjudicatory hearing before MassDEP is made within the 21-day period.

III. Facility Description, History and Operations

A. Description

Tradebe operates a waste oil storage and treatment facility on a 2.5 acre site at 441R Canton Street in Stoughton. The site is about 380 feet north of Canton Street on a parcel of land bounded on the north by the Massachusetts Bay Transit Authority (MBTA) railroad tracks, and on the south and east by residential properties. The facility is located about one mile west of the center of Stoughton.

The facility consists of a consolidated tank farm containing 11 tanks with total storage capacity of 214,700 gallons, two processing units used to filter particulates from waste as it is transferred from tanker trucks to storage tanks, a drum storage rack and container storage area with capacity to store up to 2200 gallons (equivalent to 40 (forty) fifty-five

gallon drums), a wastewater treatment facility permitted by the Massachusetts Water Resources Authority (MWRA) and a building containing Tradebe's business office and laboratory.

Tradebe's primary business is commercial storage and treatment of waste oil and oily/non-oily wastewater. The facility is authorized to accept nonflammable waste oil and petroleum-contaminated solids from a variety of sources including hazardous waste generators, spill cleanup actions and site remediation operations.

Wastes are received at Tradebe as bulk waste in tanker trucks or as containerized waste in U.S. Department of Transportation compliant containers. Waste oil and oily wastewater are treated in tanks using a combination of gravity separation to separate the water/oil layers, heating to disperse emulsions, the addition of demulsifiers that promote oil/water/solids separation, and the addition of flocculants to remove suspended solids. Treated waste oil is sold as specification used oil fuel and off-specification used oil fuel, and oil contaminated water is treated in Tradebe's wastewater treatment facility and discharged to the MWRA system.

B. Facility History

The property at 441R Canton Street in Stoughton, Massachusetts, was first developed by Walent Coal Company, which began operations at the site in 1940. The Walent Fuel Company, as it was later known, used the site for the unloading of coal containing railcars located on the adjacent railroad into concrete bins for storage and distribution, and at a later time installed tanks for the storage and distribution of home heating oil. Robert Dee purchased the property for Jet-Line Services in 1972 and the following year Jet-Line Services, Inc. started to transport, store, and treat waste oil. Jet-Line later expanded its operations to include tank cleaning.

Jet-Line Services, Stoughton received RCRA Interim Status authorization to operate a hazardous waste facility in 1980 and operated under a Massachusetts Interim Hazardous Waste Facility License from January 1981 to September of 1991. In September 1991 Jet-Line received a comprehensive (Part B) license from the Department to operate as a hazardous waste (oil) storage and treatment facility. Jet-Line Services operated the facility until March 1993.

In March 1993, Jet-line Services was purchased by ECC Acquisition Corporation based in North Carolina, which operated the facility until August 2001. On August 16, 2001, United Oil Recovery, Inc. (UOR), based in Meriden, CT, acquired the ECC facility. Tradebe Treatment and Recycling Northeast LLC (TTRNE) purchased UOR in 2012 and changed the name of the Stoughton facility to Tradebe Treatment and Recycle of Stoughton (TTRS). TTRS is owned and operated by (TTRNE). TTRS is not proposing any storage increases or operational changes in this license renewal.

IV. Authorized Waste Management Activities

A. Tradebe is authorized to store the following hazardous wastes:

<u>Waste Code</u>	<u>Description</u>
MA01	Waste Oil, Oil/Water Mixtures, Oily Solids**
D001	Ignitable waste†, 310 CMR 30.122, petroleum waste (flash point ≥ 100 but < 140 degrees Fahrenheit)
D004-D011* D018-D019* D021-D029* D035-D037* D039-D043*	Toxicity Characteristic (TC) wastes acceptable for storage only as a constituent/contaminant of the following waste streams: Petroleum Contact Wastewaters, Waste Oil/Water Mixtures, Waste Oil, and Oily and Non-Oily Solids; and TC Non-Petroleum Wastewaters (excluding flammable, corrosive, reactive, and any listed hazardous wastes)
MA97 Specification Used Oil Fuel	Regulated Recyclable Material
MA98 Off-Specification Used Oil Fuel	Regulated Recyclable Material
MA99	Non-Hazardous Waste
MA97 Off-Specification unused fuel oil product (OSUFOP) for blending to make used oil fuel.	Regulated Recyclable Material† 310 CMR 30.212(7) and USEPA OSWER memo #9441.1994(18), flash point ≥ 100 degrees Fahrenheit but < 140 degrees Fahrenheit, e.g., Kerosene, Diesel Fuel, Jet-A Aviation Fuel
None	Non-Hazardous Liquid or Solid Wastes Off-Specification Commercial Chemical Products

* Only as a constituent of petroleum or as non-petroleum waste waters

** Oily solids coded as MA01 consist of solids such as oil soaked absorbents, soil, debris, and sludge's. It could include incidental liquids that are a result of phase separation during transportation and storage.

† The Licensee may store, only in tanks, ignitable hazardous wastes that have a flash point ≥ 100 but < 140 degrees Fahrenheit.

Waste that exhibits a characteristic of ignitability is authorized for storage only in tanks and only with a flash point ≥ 100 but < 140 degrees Fahrenheit. Tradebe is authorized to store hazardous waste generated on-site from the treatment of the above-referenced wastes and as part of other facility operations.

B. Prohibited Wastes

Any hazardous waste, other than those identified by the hazardous waste codes listed in Table IV.A. above, is prohibited.

C. Non-Hazardous Waste

Tradebe is authorized to accept the following non-hazardous wastes:

- unused and used industrial and commercial products
- industrial and other wastewaters
- rinse waters and cleaning solutions
- rainwater

- spent activated carbon
- solid waste generated in normal operations of the facility

Tradebe is not authorized to store municipal solid waste. The storage of non-hazardous waste shall not interfere with hazardous waste operations of the facility.

E. Storage in Tanks

Tradebe is authorized to store designated wastes in above-ground tanks in accordance with 310 CMR 30.804(25), 30.560 and 30.690. Hazardous and non-hazardous waste solids and semi-solids are authorized for transfer only to the solids processing unit and not authorized for transfer to the storage tanks. The liquids processing unit and bell filters shall be used to filter out solid and semi-solid materials and debris in liquid waste streams.

F. Storage In Containers

Tradebe is authorized to store hazardous waste solids and liquids (those with flash point greater than 140 degrees Fahrenheit) consisting of oil, oily water, oil soaked absorbents, oily soil and oily debris, and non-hazardous wastes in drums and containers in the Drum Storage Rack or Container Storage Area, in accordance with 310 CMR 30.560, 30.680, and 30.804(24). Tradebe is prohibited from storing in containers any hazardous waste not specified in this license, except hazardous wastes generated by TTRS in its operation. The container (drum) storage is limited to only the Drum Storage Rack or Container Storage Area with a capacity of 2,200 gallons (40 drums of 55 gallon capacity or equivalent) in total. Tradebe is prohibited from accepting and storing at the facility any containers of ignitable waste (flash point < 140 degrees Fahrenheit) including any unused fuel oil product such as diesel fuel, kerosene, or Jet-A Aviation fuel that may flash at less than 140 degrees Fahrenheit. This maximum container storage capacity may be filled with any container that conforms to 310 CMR 30.680. Examples include, but are not limited to, steel and plastic drums, T-Paks, and totes.

Note that the Licensee may store hazardous and non-hazardous wastes generated on site in the container storage area. However, any hazardous or non-hazardous waste stored in the container area shall count toward the total storage capacity of the facility.

G. Roll-Off Containers

Tradebe is authorized to store oily solids generated from the solidification activity in the solids processing unit in a single 30-yard roll-off container. Tradebe is authorized to have three roll-off containers on-site and in use at any time. One roll-off container is allowed in the containment area being actively used for accumulation of solids and one roll-off is allowed to be located in the active yard or the primary truck staging area of the facility in transportation mode (prepared for transport).

Liquids may not be stored in roll-off containers except for incidental liquids that are a result of phase separation during storage. At no time shall more than 6,060 gallons (30 cubic yards) of hazardous or non-hazardous waste solids be stored in the roll-off. Solids being placed in the roll-off in the containment area are determined to be in a state of accumulation, not storage, and therefore do not count towards the facility storage capacity. For the purposes of calculation of total gallons of solids, one cubic yard of material shall be considered equivalent to two hundred and two (202) gallons of liquid. All truck loading and unloading of roll-off containers shall take place in the active yard or primary truck staging area of the facility where any potential release could be confined within the facility's containment systems.

H. Authority to Treat Hazardous Wastes and Industrial Wastewaters

Tradebe is authorized to treat waste oil using thermal and chemical treatment methods. The authorized thermal treatment method entails the heating of hazardous wastes in a tank to facilitate the phase separation of oil from water; the authorized chemical treatment in tanks is the addition of a demulsifier chemical also used for the separation of oil from water.

Tradebe is also authorized to treat wastewaters in tanks using pH adjustment and polymer injection. Treatment using pH adjustment and/or polymer injection causes heavier molecules (such as metals) to precipitate out of solution and flocculate at the bottom of the tank. The tank bottoms are then pumped out and disposed. Resultant wastewater is transferred for further treatment through TTRS's wastewater treatment system.

Tradebe is authorized to treat no more than 1,035,800 gallons of waste per month in the tanks in Containment Area A (i.e., the hazardous waste tanks). Wastes that are neither heated nor chemically treated (demulsifiers or pH adjusters/polymers), i.e., untreated waste, shall not be included in this total.

Tradebe may blend specification used oil fuel (SUOF), off-specification used oil fuel (OSUOF) and virgin fuel oil in tanks to produce marketable used oil fuels.

I. Authorization to Manage Hazardous and Non-Hazardous Wastes

Tradebe is authorized to manage hazardous and non-hazardous wastes as follows:

1. Solids and semi-solids may be placed into the solids processing unit for solidification with an agent such as sawdust. From there, the waste is transferred into a roll-off container. A filled roll-off container may be stored on-site no longer than five (5) business days prior to shipment to an off-site treatment, recycling, or disposal facility. If the roll-off container cannot be shipped within five (5) days, Tradebe shall notify the Department. At all

times, solids processing and transfer processes shall be carried out so as to prevent any airborne emissions or any other nuisance conditions from affecting areas beyond the facility. Should a nuisance condition occur, the Licensee shall immediately suspend all activity until such time as proper corrective measures have been implemented.

2. Liquid wastes are unloaded from trucks through either a direct connection to the storage tanks via the bell filter unit which is used to remove small amounts of solid or semi-solid materials or through the liquid processing unit if there are larger quantities of solid or semi-solid materials to be removed. All solids removed by either the bell filter system or the liquid processing unit shall be removed and placed into the solids processing unit for solidification. Non-hazardous wastewaters may also be unloaded directly to the wastewater tanks without passing through the bell filter units or the processing units.

J. Authorization to Market Used Oil Fuel

Tradebe is authorized to market specification used oil fuel (SUOF) and off-specification used oil fuel (OSUOF) under the requirements set forth in 310 CMR 30.220, as applicable, 310 CMR 30.250 and 310 CMR 30.260, all other applicable provisions of 310 CMR 30.000, and as otherwise provided in the License. Tradebe may receive at the facility and manage for the purpose of recycling the following:

1. SUOF which has been pre-qualified prior to shipment, as meeting the criteria of a SUOF pursuant to 310 CMR 30.215 and 310 CMR 30.216, and shipped under a transporter fee-exempt MA97 waste code;
2. OSUOF which has been pre-qualified prior to shipment, as meeting the criteria of 310 CMR 30.215 and shipped under a transporter fee-exempt MA98 waste code, or
3. Used and unused waste oil shipped as a MA01 hazardous waste, subject to the transporter fee.

V. Summary of License Conditions

In order to operate a hazardous waste management facility in Massachusetts, a licensee must comply with the requirements of the Massachusetts Hazardous Waste Regulations, 310 CMR 30.000, and all other applicable State and Federal statutes and regulations. These requirements are clearly stated in the terms and conditions of the license, and failure to comply with them may result in suspension or revocation of the license or other enforcement actions by the Department and/or the Office of the Attorney General.

The licensee must properly operate and maintain the facility to prevent any actual or potential threat to the public health, safety, welfare and the environment. In addition, the licensee shall act to prevent all actual and potential adverse impacts to persons and the

environment resulting from non-compliance and will be responsible for paying for damages caused by such non-compliance.

The licensee must provide records of activities to the Department, allow inspections, and inform the Department of any changes in activities or to the facility. In all cases, it is the obligation of the licensee to meet the burden of proof to persuade the Department that the applicant is competent with respect to hazardous waste activities. All documents submitted to the Department must be certified under penalty of law. In the event of an emergency involving hazardous waste that could threaten public health, safety, welfare and the environment, the hazardous waste emergency response coordinator will invoke the facility contingency plan, which includes notification to the Department's Southeast Regional Office in Lakeville, MA.

VI. Location of Available Information

A copy of the Draft License and additional copies of this Fact Sheet will be available at:

Stoughton Board of Health
10 Pearl Street
Stoughton, MA 02072
Contact: James Conlon
(781) 341-1300 ext. 262

Stoughton Town Library
84 Park Street, P.O. Box 209
Stoughton, MA 02072
Contact: Patricia Basler, Director
(781) 344-2711

Stoughton Fire Department
Station Number Two
1550 Central Street Stoughton, MA 02072
Contact: Mike Laracy, Chief
(781) 344-3170 ext. 9571

US Environmental Protection Agency
New England – Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912
Contact: Sharon Leitch
(617) 918-1647

MassDEP
Bureau of Waste Prevention
Business Compliance Division
One Winter Street, 7th Floor
Boston, MA 02108
Contact: Marrcus Henry
(617) 292-5576

MassDEP
Southeast Regional Office
Bureau of Air and Waste
20 Riverside Drive
Lakeville, MA 02347
Contact: Dan DiSalvio
(508) 946-2878

VII. Appeal Procedures

Pursuant to Massachusetts General Law (MGL) Chapter 21C, Section 11, any person aggrieved by a determination by the Department to issue or deny a license and has legal standing to do so, may request an adjudicatory hearing before the Department. For the purposes of 310 CMR 30.000, an "aggrieved person" shall be deemed to be any person who is or may become a "party" or "intervener" pursuant to 310 CMR 1.00. A person aggrieved by a final decision in any adjudicatory proceeding may obtain judicial

review thereof pursuant to the provisions of M.G.L. c. 30A. This license is an action of the Department. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the Notice of Final License Decision.

CONTENTS OF HEARING REQUEST

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the permit is not consistent with applicable laws and regulations.

FILING FEE AND ADDRESS

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of \$100 must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA. 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

EXCEPTIONS

The filing fee is not required if the appellant is a city or town (or municipal agency), county, district of the Commonwealth of Massachusetts, or municipal housing authority.

WAIVER

The Department may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

This Fact Sheet was prepared by the MA DEP, Business Compliance Division, Bureau of Air and Waste. For additional information contact Marrcus Henry at (617) 292-5576.