

January 3, 2024

Paul Franson
Connecticut Department of
Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

**Re: Third-Party Audit Report – Response to Comments – Drum Rinse Station
Clean Harbors of Connecticut, Inc.**

Dear Mr. Franson:

This letter serves as a formal response to the virtual meeting held on November 30, 2023, involving representatives of ALL4, Clean Harbors, and DEEP, regarding the Audit completed at Clean Harbor’s Facility, 51 Broderick Road, CT 06010 (Facility). The meeting's purpose was to address discrepancies identified in the Audit report and the October 31, 2023, Response to Comments letter, specifically concerning the discrepancy between the observation recorded within the Audit report and the current conditions at the Facility, specifically the drum rinse stations and associated signage.

We acknowledge the concerns raised regarding the misrepresentation of the drum rinse stations and signage at the Facility in the Audit report. The Audit report indicates in response to Permit Citation II(A)(6)(a) that the Auditor *“Did not observe drum rising during site visit. Separate stations are present and labeled for the specific materials present.”* Upon reviewing field notes and other documentation, it has been confirmed that the language used within the Audit report was incorrect.

Field notes indicate the Auditor observed Tank 29, Hazardous Waste Metal Bearing Liquids, 1000-gallon tank, the wastewater treatment system control and monitoring panel as well as several hoses and storage for pumps utilized in the wastewater treatment area. The field notes did not indicate that drum rinsing stations were present during the Audit. Signage concerning the various activities in the vicinity was also observed. To clarify, the drum crusher and pour-off station have signage, but there is no signage relating to the former drum rinse stations.

Following this discrepancy, the Auditor has confirmed with the Facility the operations present in the former drum rinsing area. To ensure accurate representation of the Facility's operations, a revised Audit report has been prepared and is included as Attachment A. This revised Audit report incorporates corrected observations regarding the former drum rinsing area. For clarity, the previous observations are indicated with ~~strikethrough text~~, while updated observations are presented in *italics*. In addition, a

photographic log, of the former drum rinsing area and current operations is included as Attachment B. The photographic log consists of photos taken by the Facility, post audit.

Should you have any questions about this submittal, please feel free to contact Daniel Brese at 610-422-1108 or dbrese@all4inc.com.

Sincerely,

ALL4 LLC

Daniel Brese

Project Manager

cc: Wallace Bell (Clean Harbors)
Jim Childress (Clean Harbors)
Kathryn Bailly (Clean Harbors)
Karen Thompson, CHMM (ALL4)

Attachments: Attachment A – *Revised* Audit Report
Attachment B – Photographic Log

**ATTACHMENT A -
REVISED AUDIT REPORT**

**ATTACHMENT B -
PHOTOGRAPHIC LOG**
