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Jim Cota, District 5 Project Manager
Vermont Agency of Transportation
Operations Division
PO Box 168
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April 15, 2009

Dear Mr. Cota:

It was nice to meet with you, Dan Champney and Dave Blackmore at the AOT District 5 Facilities at the Fort and Chimney Corners. I enjoyed the chance to speak with all of you as well as Mark Bissonette, and some of the other guys at Chimney Corners about environmental issues, as well as take some time to walk around those facilities.

As we discussed, an onsite visit from our program will satisfy the Good Housekeeping requirement of the MS4, which is a five year permit. So, if you choose to continue to meet that requirement with a visit from me, that is only required every 5 years; however, as we discussed, I am more than happy to visit more frequently than that, perhaps every other year, or whatever you decide is best. You can discuss the issue with Andy Shively and let me know what you think. I noted during the visit that you are doing a very nice job managing those facilities, however, I did note a few procedural and compliance issues for you to consider.

Hazardous Waste

Generator Status: As you know, any facility generating hazardous waste must submit a Vermont Hazardous Waste Handler's Site ID Form to the State's Waste Management Division. I checked the generators list and both of the facilities we visited have generator's numbers. I did however note that Central Garage is still listed as a CEG. Remember, if you bring any waste from one facility to another, the receiving facility must manage **and notify** as an SQG or LQG. You must also count the waste towards the receiving facilities generator status. As I mentioned in my previous letter, if you ship a drum of oil soaked hazardous waste to the Central Garage prior to proper disposal, that waste counts towards Central's (the receiving facility) generator status; and the fact that you sent it to another facility means you have to manage that facility (Central Garage) as an SQG even if only CEG quantities are all that is being generated at the facility. I did have a discussion with the folks in hazardous waste and they agreed certain exempt wastes could be transported to Central for aggregation and disposal or reuse, but only with a written narrative and approval from them. For example oil soaked rags could be taken to a main district facility or to Central without triggering the additional management standards, but when ANY waste is shipped from one facility to another, the receiving facility must manage to the higher standard and the waste(s) count towards the receiving facilities generators status. Please call if you have questions.

So I recommend you, or perhaps Andy check the amount of waste being generated at the Central Garage campus, keeping in mind that contiguous property under the same ownership and control counts as one facility. That would include any labs wastes being generated at the lab. So be sure to add up ALL the waste being generated at that location for all of AOT's operations located there. And not only does the receiving facility have to manage as an SQG, but Andy will also have to notify as such. Steve Simoes in the hazardous waste program should be the contact person for discussing this Central Garage issue in regards to self transporting waste there, or call me as a starting point.

Direct Compliance Issues:

- The hazardous waste generator status at Central Garage must be addressed. The provision that requires the receiving facility of waste from another facility to manage as an SQG also requires that they notify as such.
- I noted at the Chimney Corners facility that gas filters are sometimes being generated. Metal incased gas filters can be crushed and recycled with your oil filters, however, any waste gas that drips from them must be reused or properly disposed of. Waste gas **can not** be mixed with used oil that is being managed under Subchapter 8 of the Hazardous Waste Regulations. Keep in mind that any plastic incased gas filters can be properly drained and cracked open. The plastic can be disposed of as trash and the filter media can be managed as a VT02 (petroleum soaked wastes). I recommend you reuse any gas that drips from these filters in one of your small gas engines.
- To make sure you are following the vehicle washing exemption allowed by the UIC program make sure you are using a **non-phosphorus** soap for any washing that is not discharging directly to a POTW. Please read the vehicle washing fact sheet to fully understand what is and what is not ok. I noted during the visit that sediment and vehicle wash grit and grime is washing offsite along the fence line. The water is clearly sheet flowing to vegetated areas and pooling and evaporating in the area, I just recommend you consider if there is a way you could wash without all that material washing offsite, or address if there is a way you could clean it up each spring when you are cleaning the wash area.
- Remember to keep all containers storing waste closed unless actively adding to them. I noted during our visit that the spent antifreeze at the Chimney Corners facility was stored with an open funnel leaning in it. You could either close the bung after each use of the funnel, or look into a funnel with a closing lid.

Please consider each of these items and check them off once you have addressed them. You can read the fact sheets in the guide book for additional information, or call if you have questions. I also noted several issues in bullet format for you to consider. These BMPs are ideas we often get visiting other facilities or are ways to manage your facilities that can often save you money and/or make your life easier. You should also feel free to call me with questions or if you need additional clarification on anything.

BMPs and other suggestions:

- I encourage you to avoid unlabeled buckets and containers where the label is gone or you can't read it, use a marker to label them to show their contents. I saw several good examples where you were currently doing this and I encourage you to continue this practice.

- I recommend you service your oil water separator at the Fort at least once a year for these first few years until you get an idea of how much impact the system will take. When you do pump it out I recommend you test the sediments that come out of the tank. Good housekeeping inside the facility will often result in these sediments not being hazardous. They could be managed with catch basin cleanings or dewatered and used as fill with proper testing. If you have an active system in place to prevent sand and sediments from getting into the drain system the oil water separator can often be serviced every third year even once every five years.
- I recommend you confirm with Andy that any paint wastes at the Fort painting facility is properly handled and disposed of. I also encourage you to do the same for all of your operations. Please also check the grinder and safety signage in the paint building at the Fort.
- I recommend you set up a metal shavings bucket at both facilities to help manage drill press tailings, grinding swarf, power chop saw debris, and residual welding slag. Sweep any such material into the bucket that is stored in the area, and recycle it with the scrap metal. These materials can not be thrown in the trash unless you've done a hazardous waste determination on them, which would involve laboratory analysis (they are exempt as waste if they are recycled as scrap).
- You should set up an "oil soaked hazardous waste" drum or container at both facilities to help manage any petroleum soaked wastes (VT02). I noted at the Chimney Corners Facility that a grease liner from a 30-gallon container with several oil soaked pads was sitting out looking like it was headed for the trash. Those pads must be properly disposed of and the grease could be used, or must be properly disposed of and can not be disposed of as trash.
- At the Chimney Corners Facility I recommend you label the oil caddy "used oil only" and try to empty them as soon as possible after changing oil.
- At the Chimney Corner Facility (and any other for that matter) I recommend you label the connection to the outdoor used oil tank, as well as any other tank or container with the words "Used Oil" and not "Waste Oil".

I noted some VOSHA issues that we encourage you to address. I understand that AOT has a good working relationship with Project WorkSAFE and that you are very active in health and safety trainings. Here are a few areas of concern that I noted during our visit;

- 1) I recommend you review your MSDS book yearly to ensure it is up to date, consider using the Master Sheet idea with each item listed numerically
- 2) We encourage you to continue to place worker safety signage at all work benches and areas where safety glasses are needed (near the grinder, drill press, and work benches).
- 3) All gas cans should be properly labeled and stored closed unless in use
- 4) I recommend you ground the flammables storage cabinet at the Fort, or any other facility with this type of cabinet.
- 5) I recommend part of your annual safety training at the facility incorporate general environmental issues like oil soaked hazardous waste handling, spill clean up guidelines, and other general issues.

Conclusion

I enjoyed the chance to spend some time at your facilities and can see you are doing an excellent job managing your operations. Please check off direct compliance issues as you address them. I hope you will use this letter as a source of information to help you in your efforts, and please feel free to call if you're not sure about something. Please see the fact sheets in the guide book for additional information, or take a look at our web site at www.eaovt.org

Thank you for the invitation to look at these facilities and for working with our assistance program. We appreciate your positive attitude towards environmental compliance and your willingness to make changes. I look forward to additional work with you. I will be happy to assist you whenever possible and encourage you to use all of the resources available from the Environmental Assistance Office. If there is anything we can do in the immediate future, please do not hesitate to call. I can be reached at 800-974-9559 #3.

Sincerely,

John Daly
Environmental Assistance Specialist

cc Andy Shively, Hazardous Materials Specialist