

3105.9801



# STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 20, 1998

Mr. Timothy E. Lyons  
The Quinlan Companies  
125 Ernest Street  
Providence, Rhode Island 02905

Dear Mr. Lyons,

Thank you for your letter dated February 3, 1998 inquiring about Connecticut Department of Environmental Protection's regulations on the management of spent filters which collect silver and are going for reclamation. According to your letter you are following all necessary federal regulations relating to your process - Recyclable materials utilized for precious metal recovery - under 40 CFR Part 261.6(a)(2)(iii), and the regulations you pointed out in the following parts: 266.70(b)(2), 263.20(h), Subpart B Part 262.20(e), Part 262.20(e)(1)(ii) and 262.20(e)(2). I have enclosed some documents from the Environmental Protection Agency's RCRA Permit Policy Compendium and the Environmental Protection Agency's Office of Solid Waste Fax on Demand Service. DEP concurs with the federal decision regarding this exclusion and at this time, it does not appear that you are involved in any processes that are further regulated by DEP.

At this point, you will need to apply for a State transporter permit. I have enclosed this application for you to complete. In addition, if this reclamation process occurs within Connecticut, you will need to be permitted under Section 22a-454 of the General Statutes of Connecticut. You should contact David Sattler of the Bureau of Waste Management, Permitting Division at (860)424-3289 if you have any questions regarding this permitting process.

I have also enclosed the most recent Regulations of Connecticut State Agencies - Hazardous Waste Management Regulations 22a-449(c)-100 through 110 and 22a-449(c)-11, Revised July 17, 1990. You should review this information to ensure that your process does not fall into an area covered by additional DEP regulation.

Please be aware that your clients may need to apply for wastewater discharge permits and should contact the Bureau of Water Management at (860) 424-3705 for further information regarding permitting of the discharge of the wastewater from this activity. If you have any other questions, please contact MaryAnn Nusom Haverstock at (860)424-3347.

Sincerely,

Robert C. Isner  
Assistant Director  
Bureau of Waste Management  
Waste Engineering and Enforcement Division

RCI/mnh

attached EPA comp. 9496.1994 (61)

Faxback 11912  
12674  
13758  
11914  
11541  
11210

photo waste management  
records management and archives



T H E  
Q U I N L A N  
C O M P A N I E S

RECEIVED

February 3, 1998

FEB 10 1998

David Nash  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106

DEP-WASTE MANAGEMENT BUREAU  
WASTE ENG. & INF. DIVISION  
DIRECTOR'S OFFICE

Dear; Mr. Nash

In my recent conversation with Mary Ann Haverstock I have been requested to send you this request. Quinlan Companies provides installs and transports silver recovery filters. These filters collect silver and allow facilities to discharge photographic waste in to the sewer at acceptable levels. When the filters are exhausted we transport the filters to a refiner for reclamation. Filters are frequently tested and pass TCLP. We currently follow all federal guidelines (see enclosure) so that Quinlan Companies meets the metals exemption standards and does not have to categorize the filters as hazardous waste. Mary Ann Haverstock has informed me that my procedure is satisfactory. I would request a brief paragraph from you office stating if the federal guidelines are followed the filters do not have be categorized as hazardous wastes in the State Of Connecticut.

Sincerely,

Timothy E Lyons

Account Manager