



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT MATTER - EARLY WARNING NOTICE

November 7, 2024

William Giannetto, EHS&S Coordinator
Hampford Research, Inc.
54 Veterans Blvd.
Stratford, CT 06615

RE: **NOTICE OF POTENTIAL VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and Connecticut Administrative Code, Title 22a, Environmental Protection 449(c). The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

Dear Mr. Giannetto:

On March 04, 2024, EPA transmitted via email to your facility, Hampford Research, Inc., a Request for Information Letter. The purpose of this letter was to determine the compliance of Hampford Research, Inc., EPA ID # CTD075133835, with the relevant hazardous waste management regulations for the State of Connecticut and the corresponding federal Hazardous Waste Management Regulations found at 40 C.F.R. Parts 260-272.

As a follow up to the information request letter and subsequent calls and emails, a written list of deficiencies is provided below to summarize the potential violations/areas of concern identified. You are requested to take immediate action on your part to evaluate this listing below and take corrective measures where necessary.

Potential Violations/Areas of Concern:

1. Failure to make an accurate hazardous waste determination as to whether a waste is a hazardous waste to ensure proper management according to applicable RCRA regulations, as required per 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 CFR 262.11.

In its response to EPA's Request for Information, Hampford Research, Inc. self-disclosed that a

waste shipment on 12-08-2022, originally sent off-site as non-hazardous waste, was later discovered to be characteristically hazardous for corrosivity (D002) by the destination facility. Prior to shipment off-site, this waste was stored and managed in Tank 6.

2. Failure to offer for transport a hazardous waste shipment for off-site treatment, storage, or disposal along with a Hazardous Waste Manifest, as required per 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 CFR 262.20.

In its response to EPA's Request for Information Question #7, Hampford Research, Inc. self-disclosed that on 12-08-2022, it sent a shipment of 2,700 gallons of "Non-DOT/Non-RCRA Regulated Material" to Tradebe in Bridgeport, CT (CTD002593887) that was later tested and found to be hazardous (D002) by the TSD. The TSD rejected the load due to its high pH and correctly manifested the load on a hazardous waste manifest #021233624JJK.

3. Failure to accumulate hazardous wastes in a satellite accumulation container at or near their point of generation, and to remove excess waste from a satellite accumulation container and transfer to a central accumulation area, as required per 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 CFR 262.15.

In its response to EPA's Request for Information Question #8, Hampford Research, Inc. provided EPA with its Waste Management Plan. Per the plan, there are two types of waste containers used in HRI Laboratories: Collection containers and satellite waste containers. Based on the information in the waste management plan, and past observations during EPA's 2022 inspection, EPA believes that the management and location of all satellite accumulation containers are not in compliance with the RCRA regulations.

4. Failure to conduct annual personnel training and maintain documentation of hazardous waste personnel training, as required per 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 CFR 262.17(a)(7).

In its response to EPA's Request for Information Question #10, Hampford Research, Inc. self-disclosed that it did not conduct required annual hazardous waste training for any of its staff in 2021.

This letter is EPA's initial response to potential hazardous waste violations and areas of concern based on your facility's response dated May 21, 2024 to EPA's Request for Information Letter. The primary purpose of this letter is to identify potential problem areas and seek compliance. This

Notice does not limit or otherwise preclude EPA from taking civil or criminal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928 with regard to these or other violations that may be determined. EPA is continuing to investigate and evaluate Hampford Research, Inc. compliance under RCRA and may take an enforcement action as appropriate.

I urge you to take immediate positive steps to remedy the above-cited potential violations/areas of concern. If you have any questions regarding this letter or how to comply with RCRA requirements, please contact Kimberly Chavez at chavez.kimberly@epa.gov.

Sincerely,

**O'Donnell,
Mary Jane**

 Digitally signed by O'Donnell,
Mary Jane
Date: 2024.11.07 14:47:37
-05'00'

Mary Jane O'Donnell, Section Manager
Waste and Chemical Compliance Section

cc: Joseph Schiavone, CTDEEP (joseph.schiavone@ct.gov)