Hauled Waste
Is it Worth the Risk?

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Northeast Ohio Regional Sewer District
What is Hauled Waste?

• Wastewater transported and discharged at a receiving station (disposal point)
• NEORSD only accepts the following hauled wastes:
  – Sanitary wastes (chemical toilet waste and domestic septage)
  – Restaurant Fats, Oils* and Grease (FOG) from grease traps and FOG interceptors
  – Publicly Owned Sewage Treatment Plant Sludge
  – Others with approval

*Non-petroleum origin
Receiving Station
NEORSD Hauled Waste Data

- Wastes only accepted at one plant
- 2006 Summary
  - 4189 loads
  - 10,970,511 gallons
  - $580,618.52 in revenue
Problems Encountered with Waste Haulers

- Poor housekeeping after disposal
- Disposal of waste from unapproved sources
- Disposal of unacceptable wastes
- Traffic violations in the plant
- Sampling
- Deliveries outside hours of acceptance
Risks Associated with Hauled Waste

- Never really know what you are going to get.
- If you don’t take it, will you get it anyway? Or will it go to the environment?
- Pass through, interference, sludge contamination & hazards to plant personnel
Case Study #1 - Scenario

- Load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil in the sample
- Sample submitted to contract lab for qualitative GC/MS analysis
Case Study 1 – Results

- Lab reports unknown black material to be qualitatively consistent with motor oil reference standard
  - Total petroleum hydrocarbons (extractable C-16 to C34) 860,000 mg/kg
Laboratory Results

MOTOR OIL REFERENCE STD.

Northeast Ohio Regional Sewer District
Protecting Your Health and Environment
Laboratory Results
Laboratory Results
Sample vs. Reference Standard
Enforcement Action

- Immediately revoked permit to use disposal facility
- Required hauler:
  - To conduct an investigation to determine the source
  - To implement controls to prevent this from occurring in the future
Case Study 1 - Resolution

- Company determined source of oil
- Company reinforced existing operating procedures and implemented new procedures
Case Study 1-Resolution

- NEORSD reinstated permit
- Continue to monitor hauler loads
- No further problems with this hauler
Case Study #2 - Scenario

- Load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil in the sample
- Sample submitted to contract lab for qualitative GC/MS analysis
- Three days later another load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil in the sample
- Sample submitted to contract lab for qualitative GC/MS analysis
- The next day another load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil in the sample
- Sample submitted to contract lab for qualitative GC/MS analysis
Case Study 2 – Results

- Lab reports unknown black material to be qualitatively consistent with motor oil reference standard
  - Sample 1 - Total petroleum hydrocarbons (extractable C-16 to C34) 840,000 mg/kg
  - Sample 2 - Total petroleum hydrocarbons (extractable C-16 to C34) 880,000 mg/kg
  - Sample 3 - Total petroleum hydrocarbons (extractable C-16 to C34) 780,000 mg/kg
Laboratory Results
Enforcement Action

- Permit revoked as soon as data from first sample became available
- Required hauler:
  - To conduct an investigation to determine the source
  - To implement controls to prevent this from occurring in the future
- Required hauler to expand investigation based on data from the two additional samples
Hauler’s Response

- Hauler disagreed with determination
- Challenged integrity of samples
  - Alleged tampering by competitor
- Obtained splits and had independent lab offer differing opinion
- Retained a law firm and filed an extensive public record request
-Appealed the revocation of the permit to the NEORSD Hearing Examiner
Hauler’s Response

• Interviewed truck driver
• Sampled truck for residuals
• Sampled all sites (grease traps) that comprised the each load
• Interviewed the restaurant managers at each site

• RESULT – Company continued to disagree with District’s findings
Escalated Enforcement Action

- NEORSD files a request for a Show Cause Hearing
  - Minimum user charge $1300.00
  - Maximum user charge $18,400.00
Hearing

- Company moves to consolidate appeal hearing and Show Cause hearing
- Extensive questioning (~3 hrs) of the first NEORSD witness
- Sidebar conversation between lawyers and hearing examiner resulted in Hauler negotiating a settlement with District
Settlement

- Hauler agrees to submit a full investigation report and implement a prevention plan
- Hauler agrees to withdraw its appeal
- Hauler agrees to user charge of $1,300.00
- District withdraws its revocation of disposal permit
Is it Worth the Risk?

• It depends…
  – Size of POTW matters
  – What sources will you accept waste from? Some are risky than others...
    • Remember the CWT Rule!
  – Do you have ordinances, policies & procedures developed? Have you educated your haulers?
Additional Information

Questions?

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