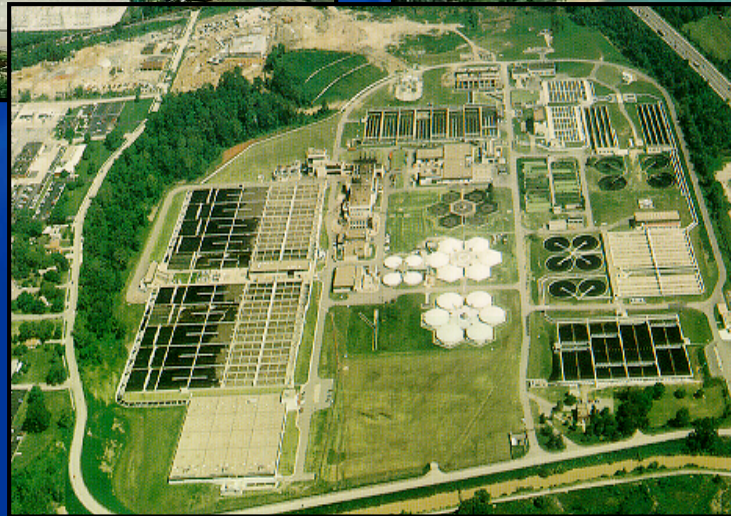


Hauled Waste

Is it Worth the Risk?

2007 National Pretreatment & Pollution
Prevention Workshop
November 14-16, 2007
Denver, Colorado

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 -Senario

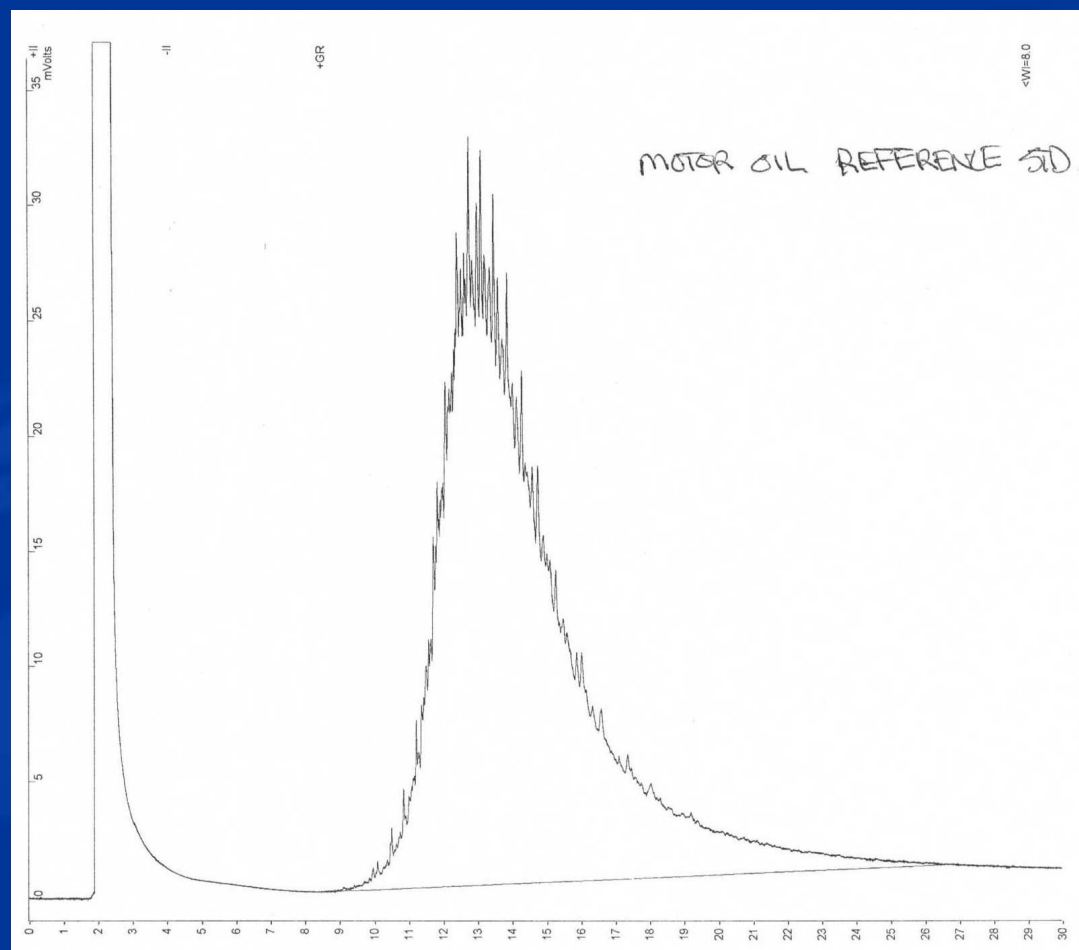
- Load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil in the sample
- Sample submitted to contract lab for qualitative GC/MS analysis



Case Study 1 – Results

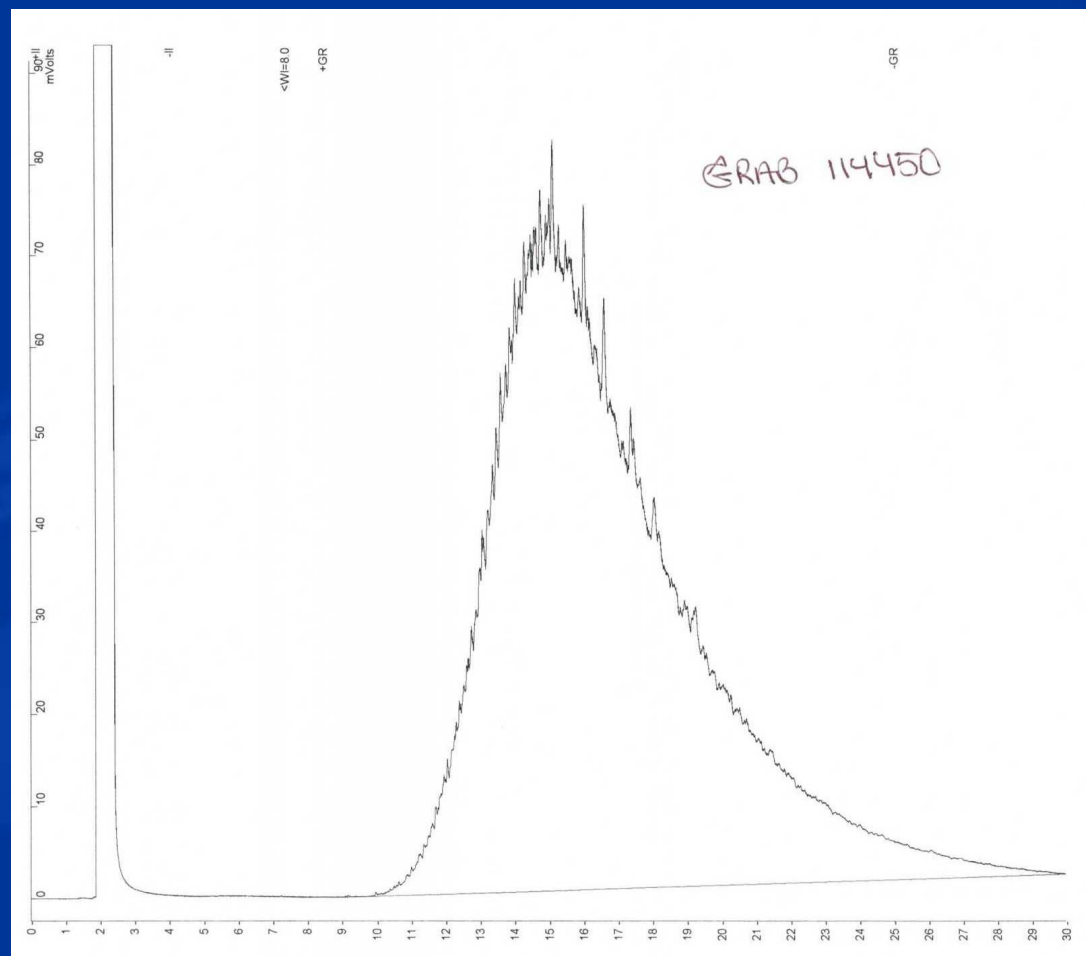
- Lab reports unknown black material to be qualitatively consistent with motor oil reference standard
 - Total petroleum hydrocarbons (extractable C-16 to C34)
860,000 mg/kg

Laboratory Results

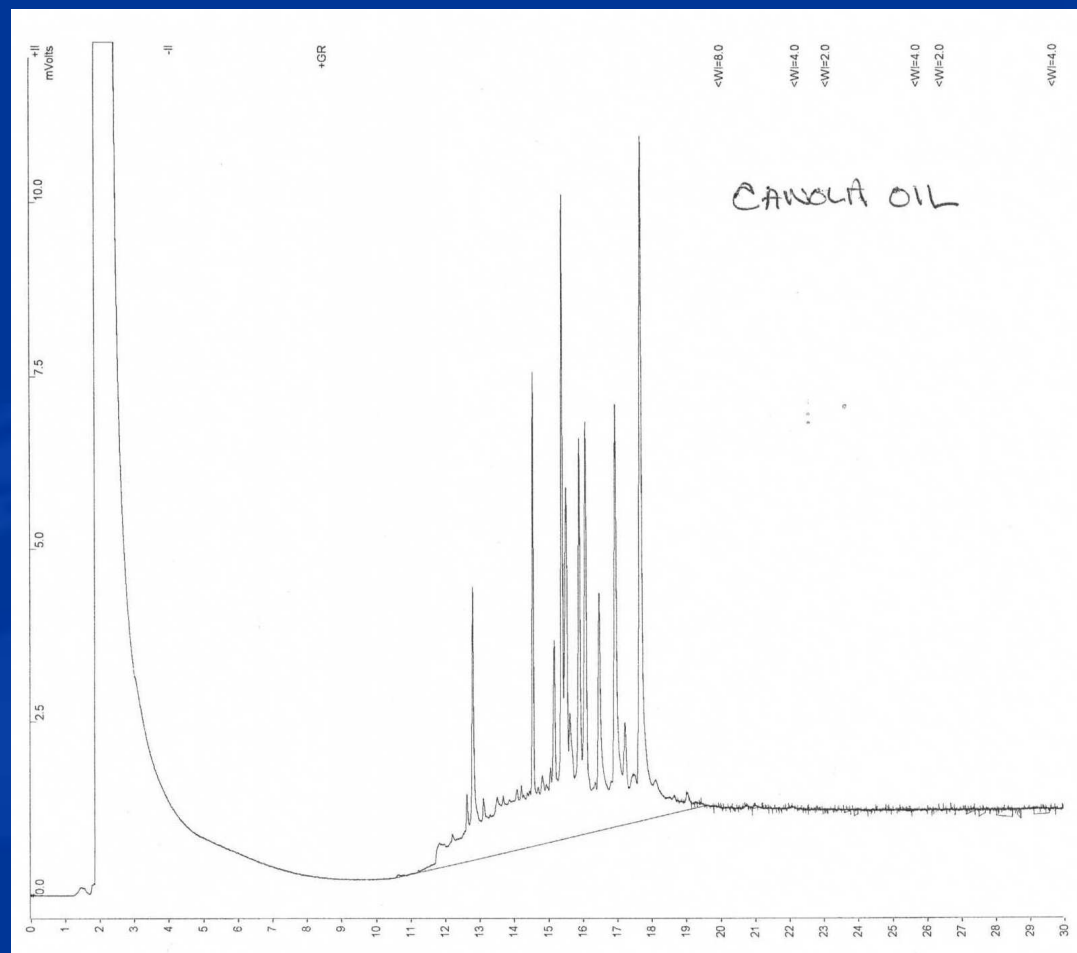




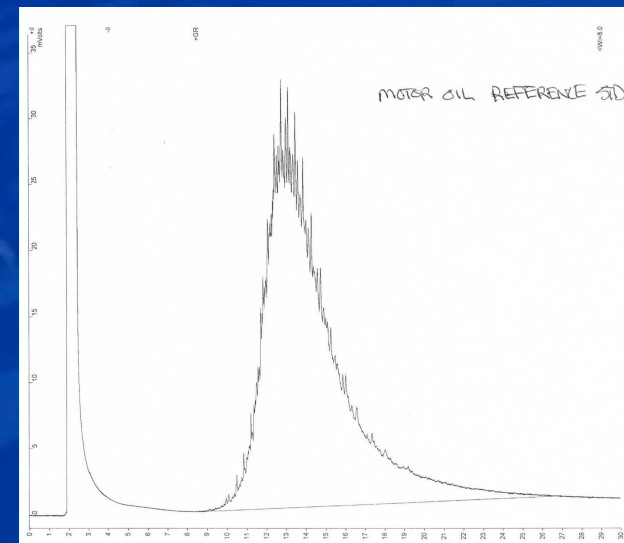
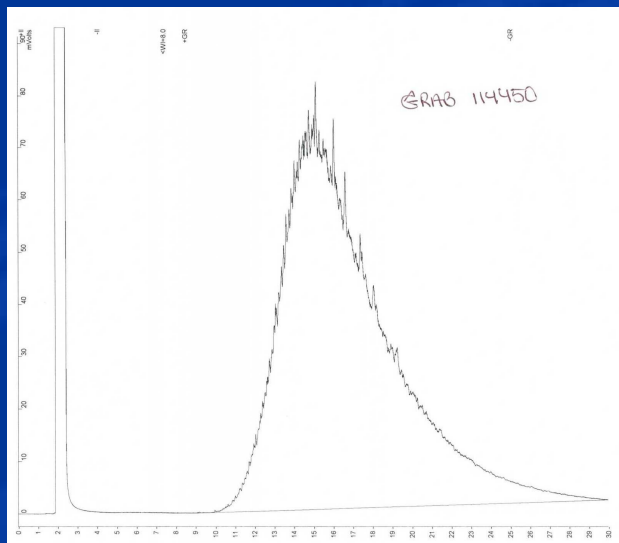
Laboratory Results



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 -Senario

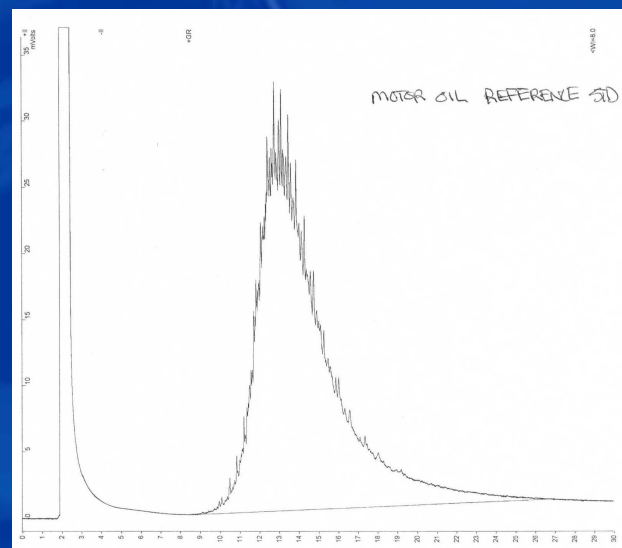
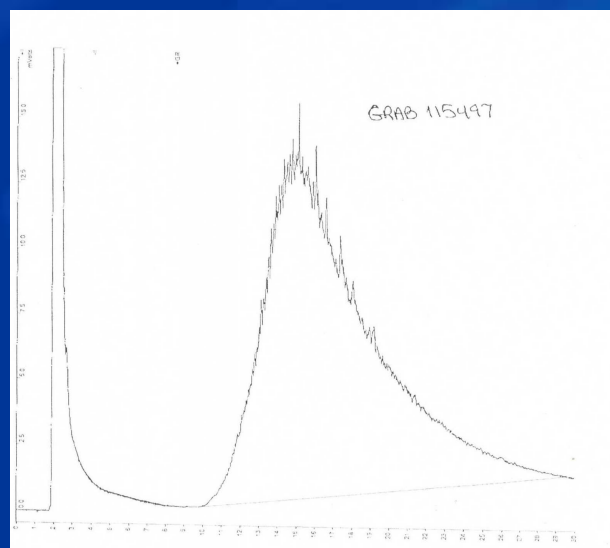
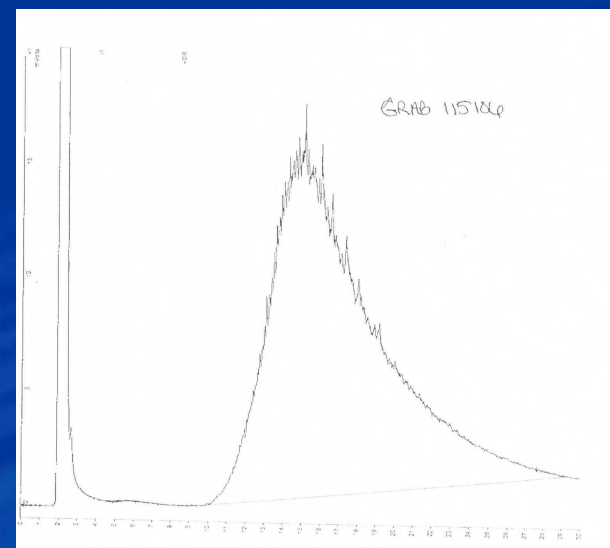
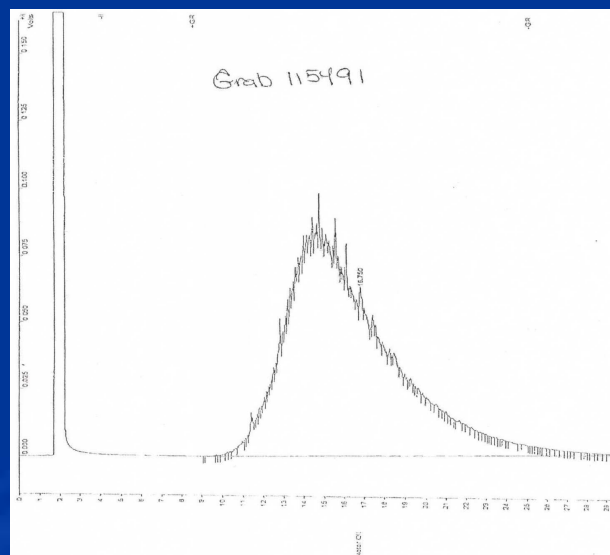
- Load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil in the sample
- Sample submitted to contract lab for qualitative GC/MS analysis
- Three days later another load of hauled waste disposed of at the plant
- Laboratory observes what appears to be motor oil 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 Reponse

- 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

- U.S. EPA. Guidance Manual for the Control of Wastes Hauled to Publicly Owned Treatment Works, September, 1999.
 - <http://www.epa.gov/owm/pdfs/hwfinal.pdf>

Questions?

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