



SANITATION DISTRICTS OF LOS ANGELES COUNTY

“It's All Non-Haz, Baby” - Dumping of Shampoo Waste into Lancaster Sewers”

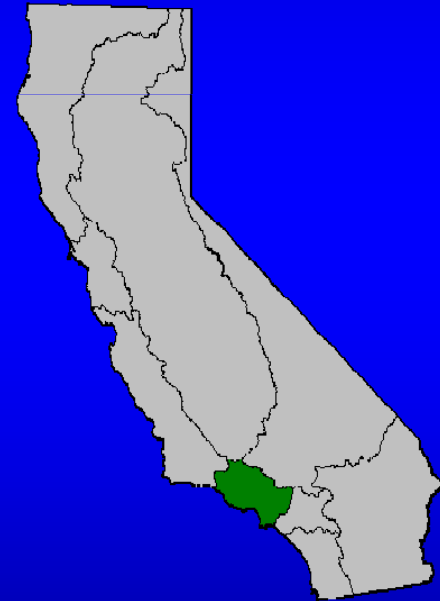
by
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Overview

- **Who are the Sanitation Districts?**
- **Pretreatment Program Background**
- **Enforcement Case Study**

Wastewater Treatment Services

- Serve 78 Cities, over 5 million people
- Treat 450 MGD
 - 1 ocean discharge plant
 - 10 water reclamation plants
- 165 MGD Available for Reuse
 - 50% actively reused



Wastewater Treatment Facilities Map



Sanitation Districts Pretreatment Program

- Wastewater Ordinance Approved April 1972
- 70 Employees, \$12 Million Annual Budget
- Objectives:
 - Protect Environment, Public Health, Employees and Infrastructure
 - Provide Recycled Water and Biosolids
 - Distribute Costs
 - Cost Effective Compliance



Industrial Users

- 2600 active permits
- 950 Significant Industrial Users
- 650 Categorical Users



Incident Investigation Methodology

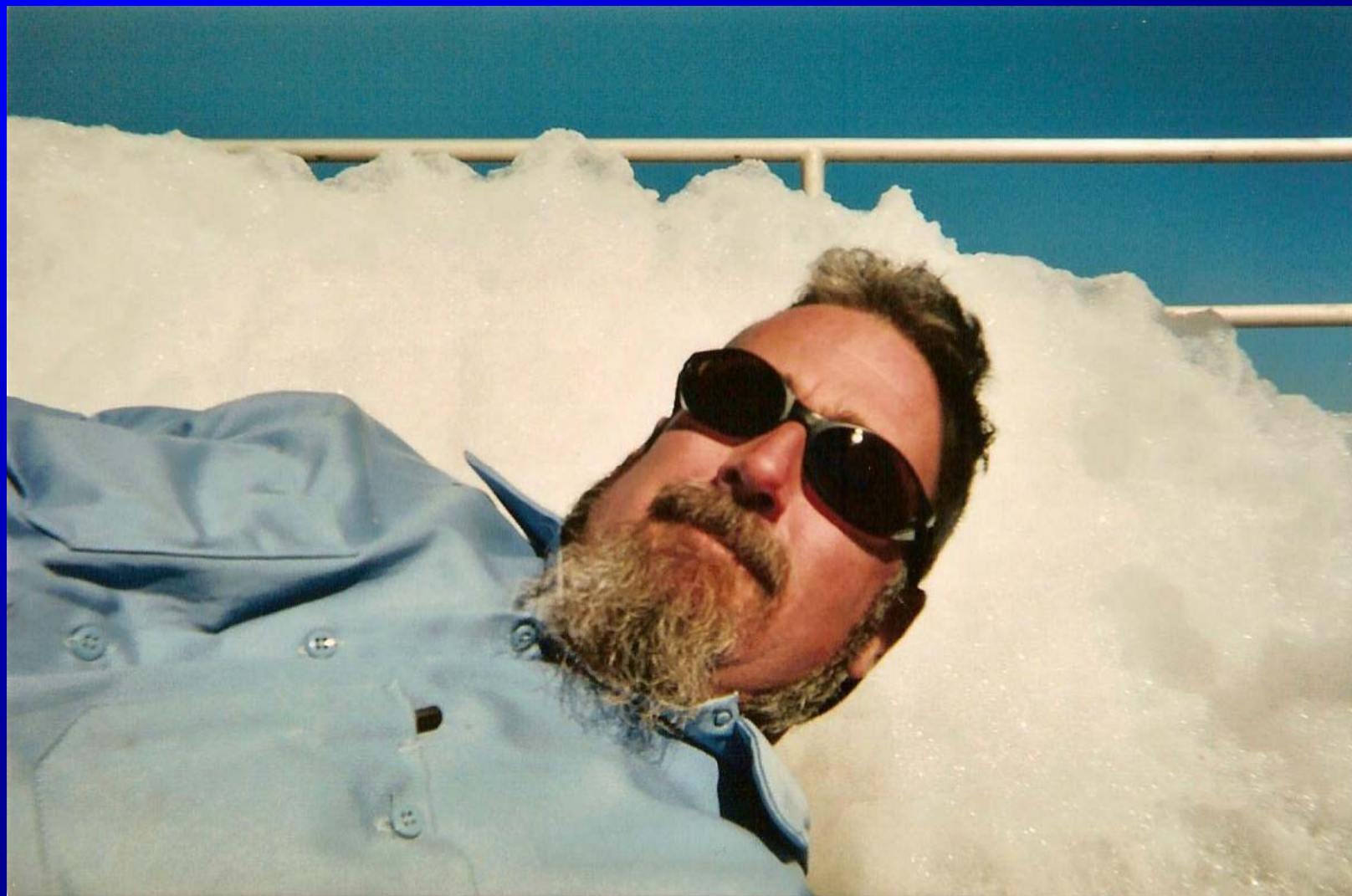
- Method 1: Trace material upstream
 - Generally difficult to do
 - Material not in the sewer when investigators arrive
 - Logistics
- Method 2: Inspect Likely or Potential Sources
 - Most common type of investigation
 - Requires list of the potential sources

Lancaster Plant Foam Incidents

- Semi-predictable – Every 1-2 weeks
- White and Billowy “Fruity Odor”
- Color Incidents with similar Odor









Hair Conditioner in Plant Influent



Initial Investigation

- Inspectors immediately identify 3 source suspects:
 - Large State Prison
 - Industrial Laundry
 - Lancaster Liquid Waste Station

Prison Detergent Manufacturing



Prison Bar Soap Manufacturing



Mission Linen and Laundry



Lancaster Liquid Waste Station

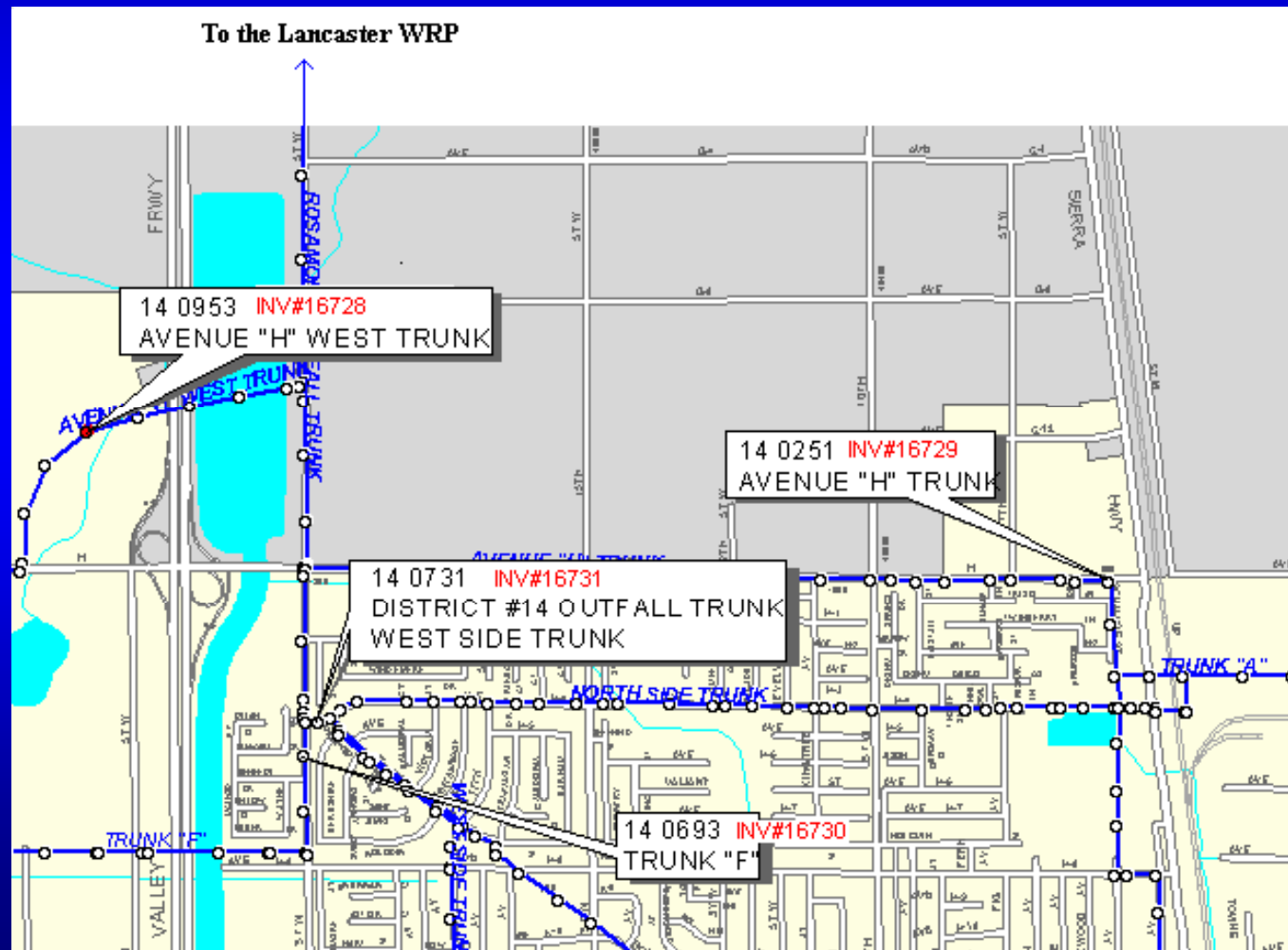


Initial Investigation Results



- No hard evidence linking any of suspected sources
- Distance hindered investigation
- Unknown Industrial Source?
- Rogue waste hauler?

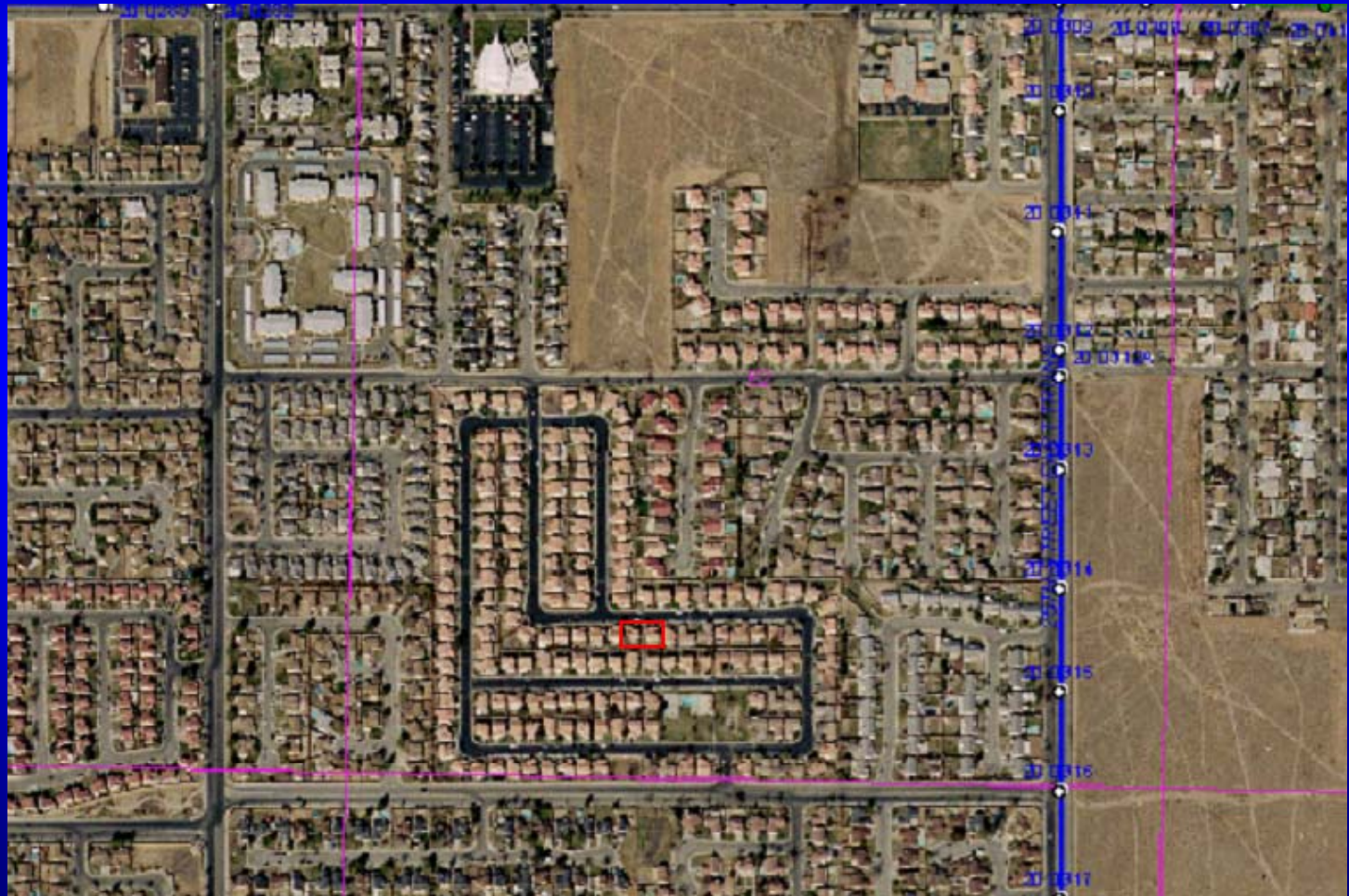
Surveillance Sampling



Inspectors catch a break!

- While at large shampoo and hair conditioner manufacturing operation in Valencia (about 60 miles away), Inspector notes that the waste manifests for company hauling wastewater has an address in Lancaster area
- Inspector calls in immediately
- S & T Pumping Co. - \$3K-\$5K per load.

Districts' GIS System Aerial Reveals Residential Address

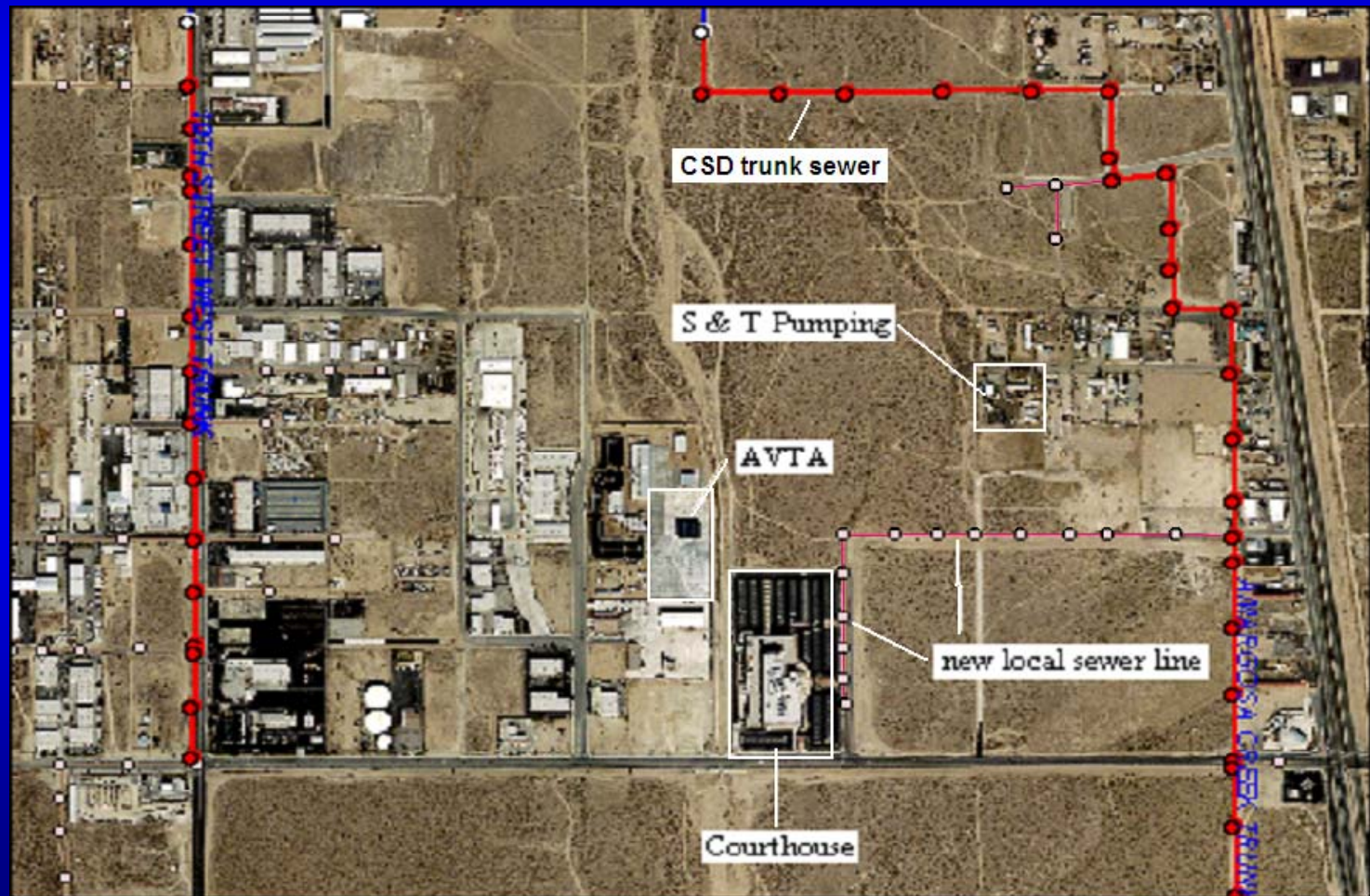


Internet Reveals 2nd Site

- Smith & Thompson Pumping Co
- Owner - Sherwin Smith.



Wider view shows nearby local sewer line and courthouse



Bingo!



Flex Hose Marks by MH



Tire Tracks Next to MH



Hey, let's get a sample of that!



Suntan lotion residual and bottle caps



S & T Pumping Co Site Inspection

- In response to odor complaints
- A joint inspection by LACSD and the County Health
- Owner interviewed and the site is inspected
 - No sewer connection onsite is found.
 - Some residual liquid waste on ground.
 - Health Dept orders cleanup, but does not cite Smith.
- Owner admits to hauling shampoo waste to adjacent counties.

“If they don’t foam in my truck, they won’t foam your treatment plant”- S. Smith.

State Takes Lead in Criminal Investigation

- Overnight stakeout follows tanker truck loaded with shampoo waste.
- Load is dumped into the sewer at self-serve car wash.
- State gets search warrant for S & T's site.



“It’s all non-haz, baby”

- Owner was present during search
- Claimed the waste onsite was all non-hazardous and being hauled to several out of county sites and Arizona.
- Owner attempted to intimidate investigators during the search. Pointing at LACSD Inspector exclaimed, “I got your (rear)”.
- Business files, computers, and samples of illegally stored wastes were taken by Investigators

Follow-up Investigation

- No waste loads from S & T were received at any of the facilities claimed by Owner.
- On 331 occasions S & T picked up waste loads but did not dispose of as claimed.
- On 273 occasions, signatures were forged on falsified "Certificates of Recycling"
- Waste generators were billed (\$3K-\$5K per load).

Resolution

- Owner, Sherwin Smith, prosecuted and pled guilty to 11 charges, including illegal handling of hazardous wastes, fraud and grand theft.
- Smith was sentenced to 1 year in jail and fined \$81,000.
- Lancaster Plant foaming incidents ceased following the search warrant issuance.

A few last words

- Difficult case to solve
- Liquid waste haulers have opportunity to transport and illegally dispose of wastes.
- Sanitation Agencies need to be vigilant.