

Controlling Hauled Waste Small Volume with Big Impact



PURPOSE FOR WASTE HAULER PROGRAM

- POTWs that meet the criteria outlined in 40 CFR 403.8(a)1 are required to develop and implement an approved pretreatment program. Under 40 CFR 403.5(b)(8), the discharge of trucked or hauled pollutants is prohibited except at points designated by the POTW.
- POTW must comply with EPA, State and local requirements.

WHAT IS HAULED WASTE?

- A term for hauled sewage
- Raw and untreated wastewater



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TYPES OF HAULED WASTE

- Portable toilets wastewater
- Domestic wastewater (Household wastewater)
- Nondomestic wastewater (Non-household wastewater)
- Industrial Wastewater

PORTABLE TOILETS WASTEWATER

- Often referred to as porta-pots, are simple portable enclosures containing a chemical toilet which are typically used as a temporary toilet for construction sites or large gatherings because of their durability and convenience
- Low volume associated with portable toilets



DOMESTIC WASTEWATER (HOUSEHOLD WASTEWATER)

- Usually from residential properties not connected to the wastewater collection system
- Typically two to four times more concentrated than regular sewage



NONDOMESTIC WASTEWATER

- Non-household wastewater
- Usually from commercial properties
- Up to 340 times more concentrated than regular sewage



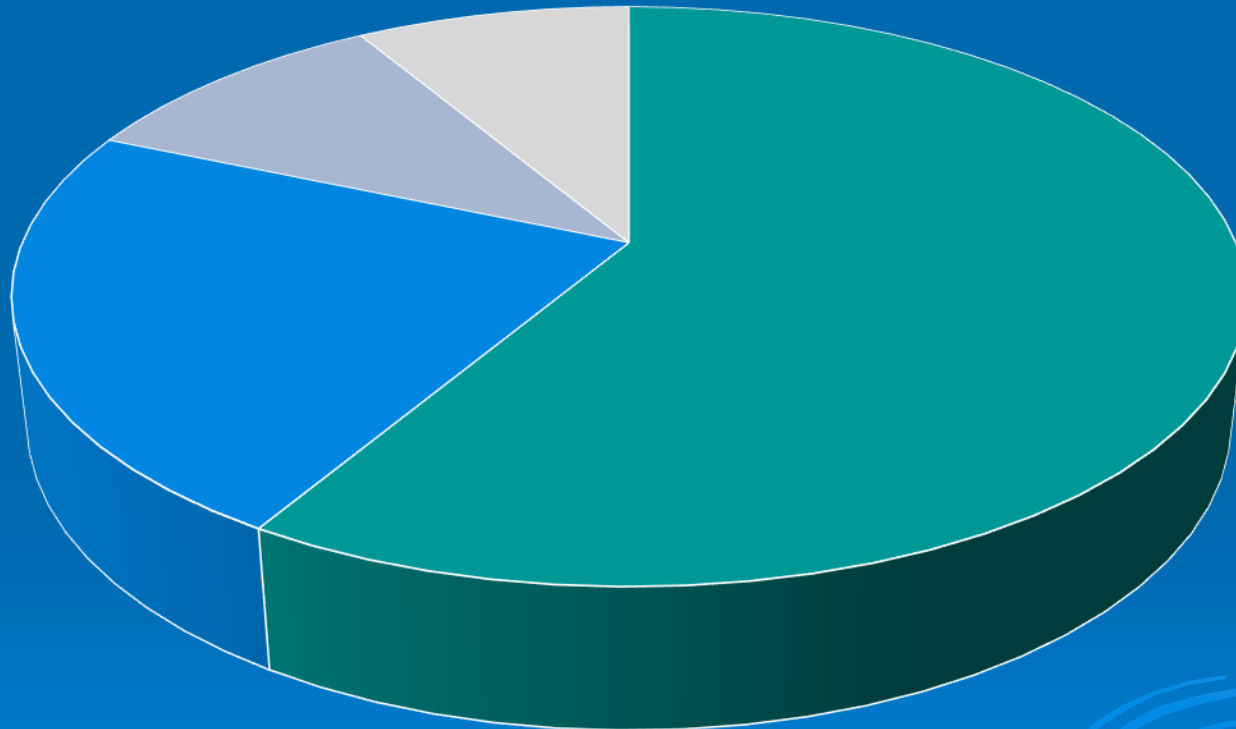
INDUSTRIAL WASTEWATER

- Non-household wastewater
- Industrial properties, process wastewater
- Hazardous waste, high risk
- NPDES permit violation
- May not be able to treat
- Extremely more concentrated than regular sewage



Typical INDUSTRIAL PRETREATMENT PIE GRAPH

wastewater



Domestic SIU Commercial Waste Hauler

So why should we be so
concerned about a small
amount ?



Even a small amount can make a big impact



PROBLEMS WITH HAULED WASTE

- More concentrated than regular sewage (the more concentrated it is, the more expensive it is to treat)
- Activated sludge treatment plants are especially sensitive to large variances in influent concentrations and toxic loads
- Unregulated Hauled Waste impacts may include pass through, interference, sludge contamination, and hazards to POTW personnel.

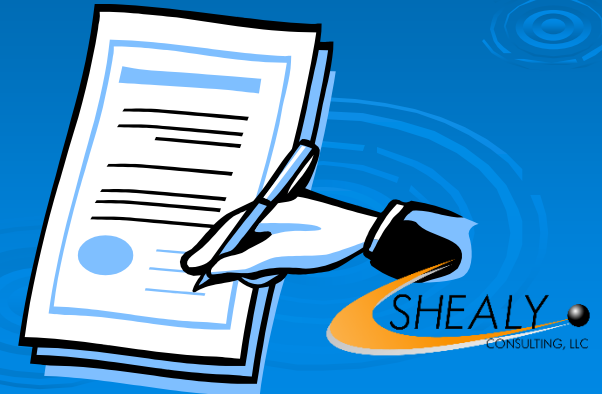
How to develop and implement hauled waste controls

- Each waste hauler must submit a permit application (*collect as much information as possible*)
- Issue Waste Hauler Discharge Permit
- Must have a designated discharge location
- Sample and inspections
- Documentation & tracking system
- Waste hauler must have consent prior to discharge of **all non-domestic loads**

WASTE HAULER PERMIT APPLICATION

- Information that POTWs should have on record for all haulers prior to granting approval to discharge includes:

Name of business • Name of owner • Address and phone number • Type(s) of waste hauled • Estimated number and volume of loads discharged per week for each waste type • List of non-domestic customers • Number and capacity of vehicles • Hours of operation • Names of other POTWs where hauled waste is discharged • Where other wastes are disposed and any other permits or license.



WASTE HAULER PERMIT APPLICATION

- Information concerning drivers and operators of hauled services.
- Valid driver license
- Criminal background check
- Communication skills
- Other type of business associated with Waste Hauler



WASTE HAULER PERMIT CRITERIA

- Completed Waste Hauler Permit application
- Identify hauler with specific identification number
- Permit issue date, effective date, and expiration date
- Comply with Federal, State and Local agencies
- Non-transferable



WASTE HAULER PERMIT CRITERIA

- Reference to POTW / City Ordinance
- Authorization to Discharge
- Permit is Granted in Accordance to Application
- Definitions
- Surcharge policy and cost of treatment
- Prohibited pollutants / limits
- Pre-approval for Non-domestic
- Duty to comply
- Specific discharge point
- Universal safety
- Insurance requirements
- Non-transferable
- Right to revoke or change
- Review or training requirements
- Special conditions



WASTE HAULER TRACKING SYSTEM

The Who, What, Where & How Much?



- Customer information
- Characterize Hauled Waste
 - Porta Pots
 - Domestic
 - Non-domestic
 - Industrial Waste
- Location / source of waste
- Sample before acceptance
- Analytical Data within permit limits
- Volume of waste
- Surcharge for BOD, TSS, COD and Oil & Grease
- Special Conditions

FALSIFYING INFORMATION

- Falsifying information.
 - Any person who knowingly makes any false statements, representation or certification in any application, record, report, plan or other document filed or required to be maintained pursuant to this article or a wastewater discharge permit, or who falsifies, tampers with or knowingly renders inaccurate any monitoring device or method required under this article, shall, upon conviction, be punished by a fine minimum of \$1,000.00 of not more than \$2,000.00 or by imprisonment for not more than 30 days, or by both. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense.

REVOCACTION OF PERMIT

Revocation of discharge permit.

Any user who violates the following conditions of this article or applicable state and federal regulations is subject to having its permit or authorization revoked in accordance with the procedures of this permit:

- (1) Failure of a user to factually report the wastewater constituents and characteristics of its discharge.
- (2) Failure of the user to report significant changes in operations or collection information of source of wastewater.
- (3) Refusal of reasonable access to the user's vehicles for the purpose of inspection or monitoring.
- (4) Violation of conditions of the permit or authorization.
- (5) Discharging to the POTW's sewer system without authorization or permit.

FRIENDLY SUGGESTIONS

- Make sure all Waste Haulers comply with Federal, State and local requirements
- Comply with EPA Guidance Manual for the Control of Wastes Hauled to Publicly Owned Treatment Works
- Make sure they file a complete and accurate permit application
- Designate discharge point
- Special conditions section
- Identify potential improvement areas
- Annual workshop & training



Questions

A large iceberg floats in the ocean. The visible tip is small and jagged, while the submerged portion is much larger and more textured, illustrating the concept of hidden or underlying issues.

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