

CHAPTER FOUR

PROGRAM ACTIVITIES TO DETECT UNAUTHORIZED WASTE

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CHAPTER FOUR

PROGRAM ACTIVITIES TO DETECT UNAUTHORIZED WASTE

Focus

This chapter presents techniques to detect unauthorized wastes at a landfill or processing facility.

Introduction

When programs and activities presented in Chapter Three, fail to prevent unauthorized waste from entering a facility, the facility operator must use detection techniques to intercept the unauthorized waste. Since there is no guarantee that prevention programs will work, the EPA and Texas Regulations require a detection program.

Even though regulations for waste screening cover only *key personnel*, detection of unauthorized waste involves all facility personnel, everywhere on the facility. Facility personnel should be familiar with the waste stream and unauthorized waste commonly found at facilities, especially those in the local area. Chapter Three covers this information in a general way.

Detection Methods

There are several techniques that can be used at varying stages of the waste acceptance phase to identify and ultimately prevent the disposal of unauthorized waste. The detection methods include:

- Awareness and Vigilance Techniques
- Area Specific Techniques
- Organized Waste Acceptance Process
- Random Screening of Vehicles
- Waste Pile Screening

Awareness And Vigilance Techniques

Heightened employee awareness and vigilance are the first and best defense against unauthorized waste. Several of these techniques are listed below.

Operator Knowledge

Be sure facility operators are knowledgeable of the wastes and transporters that use this facility (See Chapter 3 for specific wastes).

Be knowledgeable of signage and labeling of hazardous and dangerous waste. Study the US DOT 11 Chart and keep it handy. Do not let anyone dispose of waste that is marked with these labels. (Instructions are provided in Handouts.)

Vehicle Observation

React to and investigate any liquids flowing from waste or vehicles.

Any odors not usually experienced must be “checked out.” Do not try to determine what the odor is because the airborne substance bearing the odor could be very dangerous. Always approach upwind.

Smoke or heat coming from any vehicle must be investigated. Stop vehicle or direct to an area designated for “hot loads.”

Always observe driver “body language” and pay special attention to individuals who:

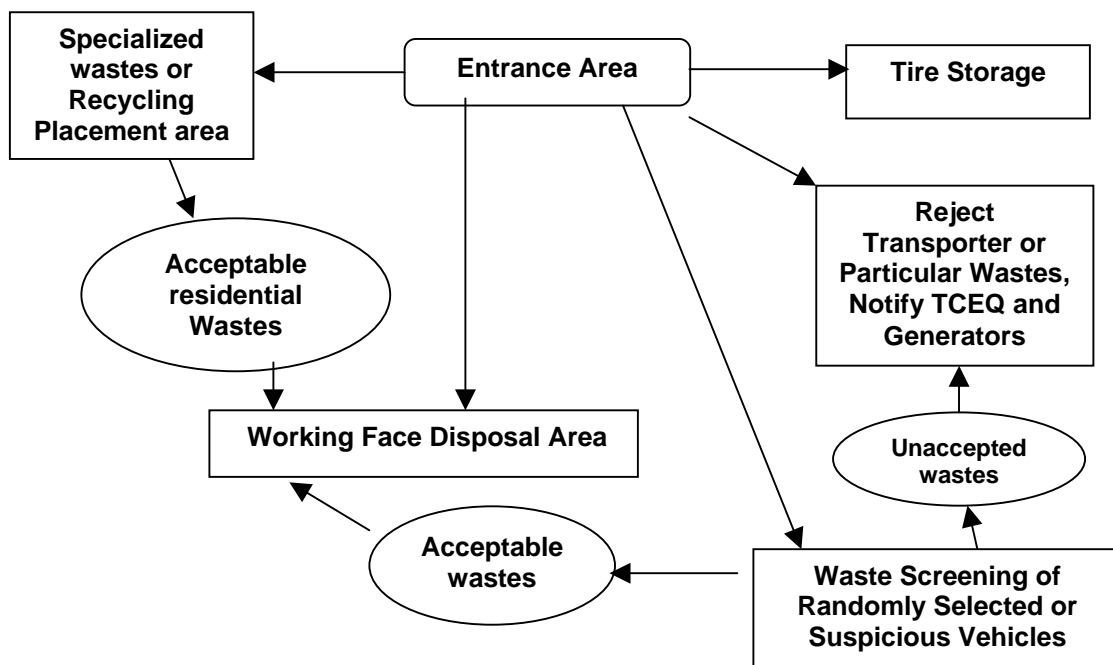
- Reluctant to cooperative.
- Evasive about their waste.
- Do not know origin or type of waste they are transporting.
- Always looking around to see if others are watching.

Waste Flow Process

Understand the waste flow process at the facility. This enables you:

- To assist customers to properly place their waste,
- To ensure wastes are place in appropriate area, and
- To investigate any irregularities occurring and observing of the waste. You can use the typical waste flow diagram illustrated below.

Figure 4-1: Waste Flow Process



First Rule For All Facility Personnel

Investigate and React To Any Unusual Situation Or Activity At The Facility!

Area-Specific Detection Techniques

Specific areas of the landfill offer excellent opportunities for setting up additional detection opportunities to intercept unauthorized waste. These areas include:

Gate House/Entrance Areas

- Observe all vehicles entering for smoke, leaking liquids, or strange odors.
- Watch “body language” as previously described.
- Questions citizens about what the household waste contains. Be careful of citizen loads that are very heavy (low riding vehicles). Check out these loads at the gatehouse or at the working face/designated disposal area.
- Check out any container larger than five gallons. Containers larger than five gallons are usually from commercial or industrial sources and must be properly cleaned and prepared for disposal. If you find such a container, do not handle unless you have been properly trained.
- All industrial loads or commercial/industrial load combinations must have a waste code. Hold the transport vehicle, until the load can be determined.
- Do not accept offers for a premium fee to accept a load. Put load to the side and investigate it.
- Call supervisor to do this investigation.

Working Face/Placement Area

- All vehicles with commercial or industrial loads should be suspected of containing illegal wastes. Periodically observe loads as they are being off loaded.
- Be alert for containers larger than five gallons. If found, set aside and call a facility person who knows how to inspect such containers.
- Always check out customers who display strange “body language,” such as looking around to see if anyone is watching them off load.
- Watch specialized placement areas closely. These include areas that accept recyclables, waste oil, tires, bulky items, and liquids. Be sure only those items are being off loaded. Be sure to check trip tickets or manifests against actual materials on vehicle.

- ❑ Working Face/Placement Area Crew
- ❑ Always investigate wastes that look different from what is normally processed. Look for unusual color, compaction, sounds and odor.
- ❑ Check out any large container not usually found in the waste stream. If found, do not compact or process rather set aside and call a facility person who knows how to investigate these type of containers.

Organized Waste Acceptance Process

The next detection technique is to have a systematic process for accepting waste or materials at the entrance area (gate house).

A systematic entrance process should be documented and all personnel working in this area must be trained in the procedures. This documentation and training insures only acceptable wastes are received and the entrance area is efficient in handling customers.

Remember the entrance is the first line of defense in detecting unauthorized waste. Facility safety and compliance are greatly dependent on the work of the entrance processing staff. The following items should be included in an entrance procedure:

Operator Training

A communication and documentation procedure for insuring the type of waste that is to be received is fully understood by entrance attendants, sales personnel, facility environmental compliance officer, and facility supervisors.

Generator Knowledge

Have a working knowledge of generators and what waste they transport. For manifested and trip ticket wastes, the required documentation should be well known by entrance attendants. For efficiency purposes a table listing transporters should be prepared to help the efficiency at the entrance area. An example is illustrated in Table 4-1 below.

Table 4-1: Transporter Information

TRANSPORT VEHICLE	COMPANY LOGO OR DESCRIPTION	TYPES OF WASTES EXPECTED
Rear Load Collection Vehicles	Helpful Disposal Company Purple/Gray Trucks	Household waste only for vehicle 21-26. Other vehicles carry commercial waste. Lookout for tires and free liquids in commercial wastes.
Rear Load Collection Vehicles	City of Mercy Blue Trucks	Household waste only.
Front End Loader Vehicles	Easy Haul, Inc Maroon and White Trucks	Commercial/Industrial wastes.
Trucks with Roll-Offs	Debris Demons, Inc. Orange and White Trucks	Check Roll-Offs 1123-1131 for asbestos and PCB ballasts from remodeling and demolition projects.

Transporters

All transporters will be informed and sign an agreement that outlines the requirements of 30 TAC 330.22 a-d. Violations will be grounds for exclusion from the facility and reporting to the TCEQ.

The following questions should be asked of all transporters including citizens hauling their own household waste or recyclable material. If any of these questions cannot be answered, check load before disposal or reject it. For loads with manifests or trip tickets, these loads shall be checked against manifest or trip ticket. If any seems questionable inspect it at the gate or screening waste.

- What type of waste is being transported? You may want to list common types of wastes.
- Where did it come from?
- If commercial industrial source, ask for waste code and/or manifest?
- If a special waste, ask what type?
- Does transporter have any prohibitive waste in load?

Signs

Post signs required by regulation that regulated hazardous and PCB wastes are prohibited at facility. Also signs should be posted stating that

**ALL VEHICLES ARE SUBJECT TO INSPECTION
AT ANYTIME WHILE ON THE FACILITY**

**VIOLATORS OF FACILITY WASTE ACCEPTANCE POLICIES WILL BE
REFERRED TO APPROPRIATE REGULATORY OR LAW ENFORCEMENT
AUTHORITIES**

Random Screening of Transport Vehicles

The Federal EPA and Texas Regulations (30 TAC 330.114.5 – Site Operating Plan) require facility operators. Have a process in place to randomly screen transporters using the facility. This procedure is intended to supplement the prevention program and other facility detection procedures. A random screening program insures a certain number of waste loads are physically inspected. This process encourages transporters to be sure they haul only authorized to the facility. This procedure also supports the transporter requirements found in 30 TAC 330.32. A random screening program involves determining the following variable:

- Which transporters to include in the screening program
- The number of vehicles to include in the screening program
- The techniques to be used to insure random selection for screening

Determining Which Transporters To Include In The Screening Program

The primary purpose of the random screening program focuses on vehicles that might be suspected of transporting unauthorized wastes. It is also important to operate the facility efficiently; so random screening should only be preformed on those vehicles most likely to be carrying unauthorized wastes. Table 4-2 outlines transporters that could be eliminated from the screening process.

The exemptions outlined below are only suggestions. Each facility must study its individual operational requirements before making any decisions for exemptions. These exemptions are suggested because these transporters are unlikely to be transporting unauthorized waste, or are already subject to inspection due to other circumstances. However, if you suspect unauthorized wastes in these exempt vehicles, screen the load.

Table 4-2: Examples of Exempted Transporters

TRANSPORTER TYPE	SOURCES AND CONDITIONS
HOUSEHOLD WASTE	<p>Single family to fourplex residential units that meet all of the following conditions:</p> <ul style="list-style-type: none"> ✓ Routes are so arrange, that only household wastes are collected, and ✓ Maps or descriptions showing routes with all updates are provided to the landfill, and ✓ The facility operator periodically field verifies information. <p>Do not exempt household waste transporters that collect waste from containers serving multiple families from alley collection unless extensive screening of wastes documents unauthorized waste are not being routinely placed in these containers.</p>
<p>Customers/Citizens Transporting Their Own Household Wastes</p>	<p>Entrance Attendants and Working Face Monitors should check loads for suspicious wastes. Always checkout trucks with commercial markings when vehicle operator claims waste is from a household.</p>
<p>Transporters Already Subject To Inspection</p>	<p>Waste loads that are already subject to inspection should not be subject to random screening. These loads include:</p> <ul style="list-style-type: none"> ✓ Transfer station vehicles previously screened at transfer station. ✓ Waste that are manifested. ✓ Waste that have trip ticket from the generator that will be verified before disposal. ✓ Tires ✓ Large or bulky appliances that will be processed and stored in a special location. ✓ Used oil that will be recycled. ✓ Wood materials and yard trimmings for compost. ✓ Items destined for recycling.

Determining the Number of Vehicles to be Screened

There is no “hard and fast” rule for determining the correct number of vehicles to include in a random screening program. The regulations require facilities to randomly screen a sufficient number of vehicles in order to determine the type and extent of unauthorized waste that may be coming into a facility. Appropriate action must be taken to eliminate any problems that may exist. Therefore, each facility operator must