



Episodic Hazardous Waste Generation: Case Study

Hazardous Waste Advisory Committee Meeting
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Overview:

The Metropolitan District is a municipal corporation chartered by the State of Connecticut in 1929 and includes the municipalities of Bloomfield, East Hartford, Hartford, Newington, Rocky Hill, West Hartford, Wethersfield and Windsor. The District provides water and sewer services to approximately 400,000 customers.

The District also...

- manages the ~\$2 billion Clean Water Project to eliminate combined sewage overflows to the CT River and other waterways.
- operates hydroelectric facilities at the Goodwin and Colebrook Dams on the West Branch of the Farmington River.
- manages an award winning Geographic Information System (GIS) that supports our many activities.
- coordinates a Household Hazardous Waste Collection Program for 28 member towns and small businesses (CESQGs).
- manages and maintains large recreational areas in West Hartford, Barkhamsted and Bloomfield.
- is under contract with the Connecticut Resources Recovery Authority for the operation of a 2,000-ton per day resource recovery plant for municipal solid waste.



EPA Status: **All facilities are CESQGs (<100 kg/month)**

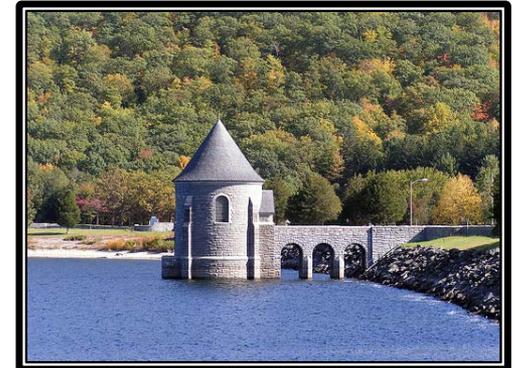
Sewage Treatment

- *Hartford WPCF
- Rocky Hill WPCF
- East Hartford WPCF
- Poquonock WPCF



Water Treatment

- West Hartford Filters WTP
- Collinsville WTP
- Reservoir #6 WTP: Bloomfield



Water Supply

- Water Supply HQ: Barkhamsted
- West Branch HQ: West Hartland

Maintenance / Admin

- Operations Facility: Hartford
- *Vehicle Maintenance Facility: Hartford
- Administrative HQ: Hartford

Other

- 100+ pump stations
- 2 Hydroelectric Facilities
- Waste Processing Facility: (CRR)



* These facilities generate process hazardous waste, all others generate waste episodically.



Typical Non-RCRA Wastes:

CT Regulated

- Used Oil / Filters
- Polluted Soil from Sewer and Water Main Repair and Installation



Recycled Materials

- Universal Waste
- Scrap Metal
- Paper / Plastic / Glass / Cardboard

Special Waste

- Sludge Ash / Bricks / Clinkers
- Sewer Grit
- Stormwater Catch Basin Residue (Hartford)



Miscellaneous

- AC units
- Spent granulated carbon (odor control)
- Municipal solid waste





Hazardous Wastes Generated:

Process Hazardous Waste Generation

- QA/QC Laboratory at HWPCF
 - Nitrogen Analysis
 - Characteristic
 - D002 (Corrosivity)
 - D006 (Cadmium)
 - Stored at site with proper labels and containment
 - Manifest Waste
 - Generation Frequency: ~ 4x per year

- Vehicle Maintenance
 - Waste paint thinner (paint spray booth)
 - F003, F005 (Listed)
 - D001 (Ignitability)
 - Manifest Waste
 - Volume: <20 gallons per event
 - Frequency: Once per year





Hazardous Wastes Generated (continued):

EPISODIC Waste Generation

- Lab Packs (typically >100 kg)
 - WPCF/WTP QA/QC Laboratory Clean Outs
 - Outdated Materials: Maintenance Sheds (i.e. paints)
 - Outdated Materials in Vehicle Maintenance Garages

- Lead Paint (D008)
 - Facility Renovations
 - Blast Grit (i.e. water tanks)

- Illegal Dumping
 - Watershed Property
 - 58,000 Acres

- Comply with SQG requirements during waste generation if >100 kg.
 - Temporary EPA ID Number
 - Uniform Haz Waste Manifest
 - Accumulation time limit \leq 180 days.
 - Emergency contact postings, and
 - Training





Hazardous Waste Disposal Option for **CESQGs**

Household Hazardous Waste Collection Program

- DEP General Permit (DEP-RCY-GP-007)
- Collections held in the spring and fall on Saturdays (8 am to 1 pm)
- Collections held at different locations
- 28 member towns for residents and small businesses (CESQGs)

- Small businesses (CESQGs) must coordinate with MDC to dispose of hazardous waste at a scheduled collection. **CESQGs pay only for disposal.**
- Go to <http://www.themdc.com/hazcesqg.pdf> for conditions, forms and additional information.
- Household Haz Waste Hotline: 860-278-3809.
- Some restrictions on volume and type of waste.
- 5-day notification to MDC.
- Business is responsible for bringing waste to the collection on the agreed date/time.



Coordinator:

Amy Velasquez, Environmental Analyst
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Challenges / Concerns:

Training

- MDC's EH&S Department coordinates annual RCRA / DOT 8 HR training for employees at most facilities. Includes Universal Waste management.
- Although Uniform Hazardous Waste Manifests are not required for CESQGs, MDC requires trained employees to sign manifests.

Numerous Facilities

- MDC has approximately 12 large facilities that generate waste.
- Over 100 Pump Stations and ~11 water storage tanks.





Challenges / Concerns:

Process Haz Waste Generation

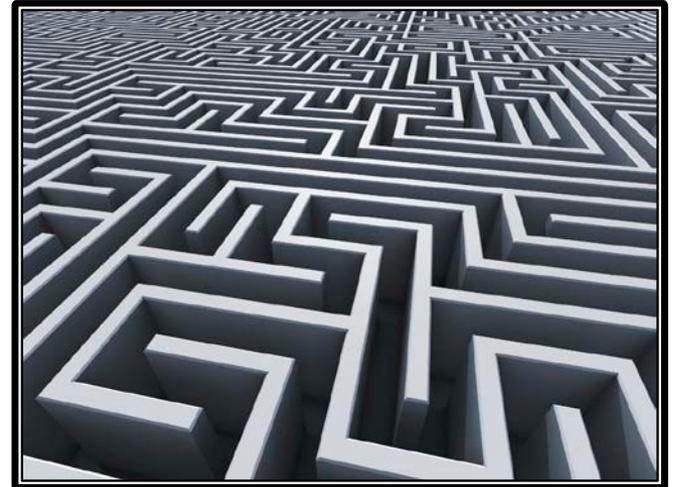
- Schedule disposal events often enough to maintain CESQG status.

EPISODIC Haz Waste Generation

- Maintain CESQG status at facilities that generate quantities > 100 kg episodically. Minimum frequency to maintain CESQG status?
- Street addresses for pump stations or standpipes for manifests (Box 5).

Document Tracking

- Manifest / bill of lading tracking system.





Questions / Comments?



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Thank you for your time!