

Acceptance of Special Waste at County Landfills

Report No. 93-11

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INTRODUCTION AND BACKGROUND

The special study of the Solid Waste Division's practices in accepting special waste at the County's landfills was requested by the County Council in response to environmental and health concerns relating to the effects of disposing of unacceptable wastes at County landfills. Unacceptable wastes include dangerous or hazardous wastes which, when disposed improperly, would pose potential and/or substantial hazard to human health and environment.

The Solid Waste Division of the King County Department of Public Works is charged with the responsibility of providing safe and environmentally sound disposal of municipal solid waste. Municipal solid waste is any combination of non-hazardous waste generated by residential sources, and any institutional, commercial, or industrial waste.

OBJECTIVE AND SCOPE

The purpose of the study was to determine if the Solid Waste Division was in compliance with County policies, standard procedures, and regulations related to accepting or not accepting solid waste that might be characterized as special, dangerous, or hazardous waste for disposal at the County's solid waste facilities.

The study was limited to the review of relevant statutes, regulations, policies and procedures, generators' clearance application forms, decision clearance forms, waste shipment reports, unacceptable waste reports, and other Special Waste Unit records. Audit staff visited County solid waste facilities and observed the cashiering and waste acceptance processes related to incoming loads at County transfer stations and landfills.

SUMMARY STATEMENT OF FINDINGS

While there were instances of non-compliance with County policies as enumerated and described in this report, the study found that the Solid Waste Division was in substantial compliance with County policies, standard procedures and regulations, and with Solid Waste Division's clearance process where solid waste was classified as acceptable, conditionally acceptable, or prohibited waste for disposal at the County solid waste facilities.

MAJOR FINDINGS AND RECOMMENDATIONS

Finding 1. Cashiers at Cedar Hills accepted loads of special waste even though authorizations had expired.

In some instances, cashiers at the Cedar Hills Landfill accepted loads of special waste from transporters based upon expired Waste Clearance Decision Forms. This practice did not comply with the County's policy, "Clearance of Solid Waste Disposal Policy."

The study recommended that cashiers at the scalehouse of the Cedar Hills Landfill should carefully verify the information of Waste Clearance Decision Forms presented by transporters of special waste. Entry and disposal of special waste should be denied if the validity date of the Waste Clearance Decision Form has expired or other terms on the clearance form are not followed by the transporter or generator of special waste.

Finding 2. Cashiers failed to note clearance numbers on daily load report.

Cashiers at the Cedar Hills Landfill, on some occasions, failed to note on the cashier's daily load

report the numbers of the Waste Clearance Decision Forms that were checked when the loads of special waste were admitted for disposal at the landfill. The manually-kept daily load report was also used in preparing reports related to special waste. The failure of cashiers to note the number of the Waste Clearance Decision Form on the daily load report could indicate that they failed to check the Waste Clearance Form when special waste was accepted for disposal at the Cedar Hills Landfill. This practice did not comply with King County's policy which required the cashier to record the number of the Waste Clearance Decision Form in the cashiering system.

The study recommended compliance with the County's policy.

Finding 3. Compliance with terms of waste clearance form was not monitored.

The Special Waste Unit did not monitor compliance with the terms of the Waste Clearance Decision Forms by verifying the actual quantity, frequency of disposal, and the type of special wastes that were disposed of at the Cedar Hills Landfill, and comparing them to the terms of the Waste Clearance Decision Forms issued to the generator of special waste.

The study recommended that the Special Waste Unit should randomly and routinely check incoming waste and compare the type of waste, the actual quantity, and frequency of disposal of special waste to the terms of the Waste Clearance Decision Forms. The study also recommended that the Special Waste Unit should reconcile the number of Waste Clearance Decision Forms issued to the actual number of Waste Clearance Decision Forms used and presented at the scalehouse of the Cedar Hills Landfill.

Finding 4. Routine, random load inspections were not conducted.

The Solid Waste Division did not conduct routine, random load inspection of special waste at the Cedar Hills Landfill scalehouse before special waste was disposed of at the landfill. Consequently, dangerous or hazardous wastes could have been dumped without the County's knowledge. The Solid Waste Division has in its standard procedures a requirement for the special waste technician to inspect each asbestos load, periodic loads of other special waste, and all suspicious loads.

The study recommended that the Solid Waste Division should develop and implement a program of routine and random inspections of loads of special waste that come into the Cedar Hills Landfill before the waste is dumped. Routine inspection of incoming waste would minimize the possibility of disposing of unacceptable and unapproved waste at the County's landfill.

Finding 5. Special waste was disposed of at Vashon Island landfill without waste clearance decision forms.

Some special waste was disposed of at the Vashon Island Landfill without Waste Clearance Decision Forms issued by the Special Waste Unit, and the solid waste fee charged by the landfill cashier was the basic rate instead of the special rate for special waste specified in the King County Code.

The study recommended that the cashier at the scalehouse should be instructed to deny entry to any vehicle carrying loads of special waste without the proper Waste Clearance Decision Form; a record of daily load report should be maintained; the special waste rate of \$100.00 per ton should be charged for special waste; and the Special Waste Unit should conduct a worksite inspection of selected generators of special waste on Vashon Island to determine how their special wastes are being handled.

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