



REGION 1

BOSTON, MA 02109

Date: *Dated as shown on electronic signature*

Subj: Clean Water Act Inspection Report for Republic Services Inc.

Subj: Alex Rosenberg, EPA Inspector

Thru: Damian Bednarz, EPA Inspector

To: File

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ROSENBERG
Date: 2024.10.30
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I. Facility Information

A. *Facility Name:* Republic Services Inc. (AKA Allied Waste of MA - Revere)

B. *Facility Location:* 320A Charger St Revere, Massachusetts, 02151

C. *Facility Contacts:* Ed Veilleux, Supervisor

Jim Atkins, Maintenance Manager
Jatkins@republicservices.com
(617) 293-4318

Chris Ford, Environmental Manager
(508) 786-7022
cford2@republicservices.com

D. *ID No(s):* MAR053364

II. Background Information

A. *Date(s) of inspection:* Oct. 7, 2024

B. *Weather Conditions:* 0.11 inches rain, 55° F

C. *US EPA Representative(s):* Alex Rosenberg

D. *State/Local Representative(s):* N/A

E. Federally Enforceable Requirements Covered During the Inspection:

Oil Pollution Prevention Regulations, 40 CFR Part 112.

National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activities (September 21, 2021), 40 CFR Part 122.

F. Previous Enforcement Actions: N/A

III. Type and Purpose of Inspection

I, Alex Rosenberg, a credentialled EPA inspector, conducted an unannounced site inspection at Allied Waste of MA - Revere regarding compliance with federal Clean Water Act, particularly, MSGP permit requirements concerning stormwater discharges associated with industrial activity and Oil Pollution Prevention regulations.

IV. Facility Description

Allied Waste of MA - Revere is a trash and recycler hauler vehicle maintenance yard, with an associated primary Standard Industrial Classification ("SIC") Code of 4212 (Local Trucking – solid waste collection without storage) and is located at 320A Charger Street, Revere Massachusetts (the "Facility"). Allied Waste of MA - Revere is operated by the entity with a legal name of Allied Waste according to the Notice of Intent to discharge (NOI). According to the Facility's stormwater pollution prevention plan ("SWPPP") the facility is owned by Allied Waste Systems, Inc. ("Allied"). Public business records indicate that Allied Waste Systems Inc. is owned by Republic Services Inc. ("Republic"), a national waste management company with 74 recycling centers across the United States, according to Republic's website. The website also identifies that Republic Services Inc. and Allied Waste Systems, Inc. merged companies and established a headquarters in Phoenix, Arizona in 2008.

The Facility's parcel is approximately 4.4 acres and is located northwest of Charger Street. Diamond Creek and saltmarsh wetlands are located north of the Facility with a concrete recycling facility between the Facility and these waterbodies.

V. Inspection

I arrived on site unannounced at the Facility at approximately 10:50 a.m. on October 7, 2024.

A. Opening Conference

I presented my credentials to Mr. Ed Veilleux, the Garage Supervisor, and explained the purpose of the inspection. I asked for a copy of the Facility's Stormwater Pollution Prevention Plan (SWPPP). Ed went to get the SWPPP and also invited to the conversation Mr. Jim Atkins, the Maintenance Manager. Ed and Jim joined me for the opening conference.

The SWPPP provided was originally dated as being drafted in 2012. The Facility site map from within this 2012 SWPPP was reviewed and utilized by Facility representatives to explain the Facility's ongoing industrial activities and stormwater management practices.

According to information provided during the opening conference, the Facility consists of one building containing offices, a Vehicle Maintenance Shop, a Lubrication Room, and a Container Maintenance Shop. The Vehicle Maintenance Shop has seven vehicle bays, the Container Maintenance Shop has four bays, and the lubrication room has two vehicle bays. The Lubrication Room (photo 8) was previously used as a vehicle washing area (wash bay) but is now used to store oil-based fluids.

The Facility's 2012 SWPPP States that discharges from the interior floor drains within all bays flow to the wash bay and through an oil water separator ("OWS") prior to discharging into the sanitary sewer system. According to Facility representatives the OWS discharges into a holding tank in the wash bay that does not discharge and is emptied by a 3rd party when volume is observed to be high by Facility workers.

Upon initial questioning, Facility representatives were uncertain about whether the holding tank discharges into the sanitary sewer system. I pointed out that the site map from the 2012 SWPPP has a line indicating the discharge flow path from the holding tank into the sanitary sewer. The line is labeled as "covered". After seeing that, Facility representatives came to the consensus that the holding tank is now a tight tank (does not discharge). This conclusion aligns with the additional information provided by Facility representatives which is that the tank is pumped out by a third-party contractor on a semi-regular frequency (approximately every few months). Daily visual inspection of the water level within the tank made through a floor grate (photo 9) determines when the contractor is called to pump-out the contents.

Vehicles used for collection and transportation of solid waste and recyclables are parked on the large-paved area located northwest of the building when not in use and/or awaiting maintenance. Additionally, empty solid waste containers/bins used for solid waste disposal are mainly stored on the far northwestern end of the paved area, beside parked hauling vehicles. A vehicle fueling area is also located on the paved area, directly northwest of the building. According to the 2012 SWPPP Industrial activities at the Facility include:

- Vehicle Fueling;
- Vehicle Washing;
- Vehicle and Equipment Maintenance;
- Container and Bin Maintenance;
- Solid Waste Hauling Vehicle Parking;
- Container/Bin Storage; and
- Employee Parking.

Facility representatives stated that a third-party contractor comes on to site to do all truck washing every other Sunday. They recycle and collect all wash water.

Facility representatives stated that a third-party contractor, Millennial, sweeps the Facility every other week.

B. Facility Tour

Part 4.1 of the MSGP requires applicable monitoring (benchmark, indicator, etc.) to be applied at each discharge point authorized by this permit. Part 3.2.1. of the permit requires visual assessment, once each quarter for your entire permit coverage. A stormwater sample must be collected from each discharge point (except as noted in Part 3.2.4), collected in such a manner that the samples are representative of the stormwater discharge.

Facility representatives stated that stormwater samples are collected by an outside contractor from a metal 6-inch diameter sampling port in between the northern entrances to the maintenance garage bays (Photo 12) and CB-05, the sole discharge point permitted at the Facility. The sample port is located approximately 5 ft south of a sewer drain cover (Photo 3).

Facility representatives stated that the Facility has seven catch basins which all contribute flow through CB-05 before discharging off-site into the Pines River. Considering catch basins capture stormwater from areas with unique industrial activities (i.e. vehicle storage, refueling areas, maintenance, etc.) it is a requirement of the MSGP that monitoring captures combined flow from all catch basins. It is unclear due to inadequate mapping of stormwater infrastructure whether the sample point is representative of the combined flow from all seven catch basins on site.

Catch basin CB-04 (Photo 4) has two solid metal drain grates approximately 5 feet to its' east (Photos 4, 5, 9 and 10). The water surface within the compartment under the closest of the two drain covers was covered by approximately half an inch of oily white scum. When the surface was agitated by a metal stick, water below the scum appeared slightly opaque. Water within the compartment under the second drain cover, located approximately 10 feet from to CB-04, and 5 feet from the first drain cover, had no visible sheen and lower opacity.

I stated that Part 2.1.2.3 of the MSGP requires the Facility to maintain all structural control measures so that they remain effective, to minimize pollutant discharges. This includes but is not limited to all industrial equipment and systems.

During the Facility Tour, Facility representatives stated that the OWS downstream of CB-04 has never been inspected or maintained.

C. Records Review

Upon request to review the current SWPPP, Facility representatives provided a SWPPP dated May 17, 2012. This SWPPP was reviewed while on-site.

I explained that the Multi-Sector General Permit ("MSGP") was re-issued in 2021, and as part of this re-issuance, the Facility was required to redraft or update the SWPPP to meet the new requirements of the 2021 MSGP. The SWPPP from 2012 had dated signatures indicating plan review and "recertification". These recertification signatures were recorded within the a table almost every year. The date of the most recent recertification is April 26, 2024. No updates or changes to the 2012 SWPPP were noted.

The site map within the 2012 SWPPP (Photo 1) depicts the flow path of discharge from CB-04 as flowing through an Oil Water Separators (OWS) and then towards a junction manhole where it confluent with flow

from CB-01, CB-02 and CB-03 before flowing to a drain manhole and then into CB-05, the Facility's sole discharge point.

Section 2.4 of the 2012 SWPPP describes how two OWSs are present on-site. One inside the washing bay and one downstream of CB-04.

Facility representatives were unaware of the existence of the outdoor oil water separator downstream of CB-04 (photo 4).

The 2012 SWPPP states the outdoor OWS was installed in 2013, and it must be maintained.

Facility representatives explained that regular clean-out of the holding tank down-gradient of the indoor OWS's is conducted, but no maintenance or inspection of the outdoor OWS has been conducted in their time working at the Facility, which began before 2012.

The 2012 SWPPP describes how hay bales and or filter socks are used around catch basins. Neither hay bales and or filter socks were observed on the site walk.

On October 8, 2024, the day following the inspection, Mr. Atkins submitted an unsigned electronic copy of a SWPPP dated May 28, 2021, which he stated is the current SWPPP. The site map from the 2021 SWPPP (see a clipped portion below in Figure 1.), does not depict the outdoor OWS downstream of CB-04.

The outdoor OWS described is also omitted from within the narrative description of Structural Control Measures in the 2021 SWPPP. Section 2.0 of the 2021 SWPPP describes the stormwater conveyance system as all draining to CB-05, without mention of an OWS.

An OWS "located outdoors north of the building" is listed as a potential pollutant source in Table 3-2. It is assumed this refers to the OWS that treats water from internal floor drains.

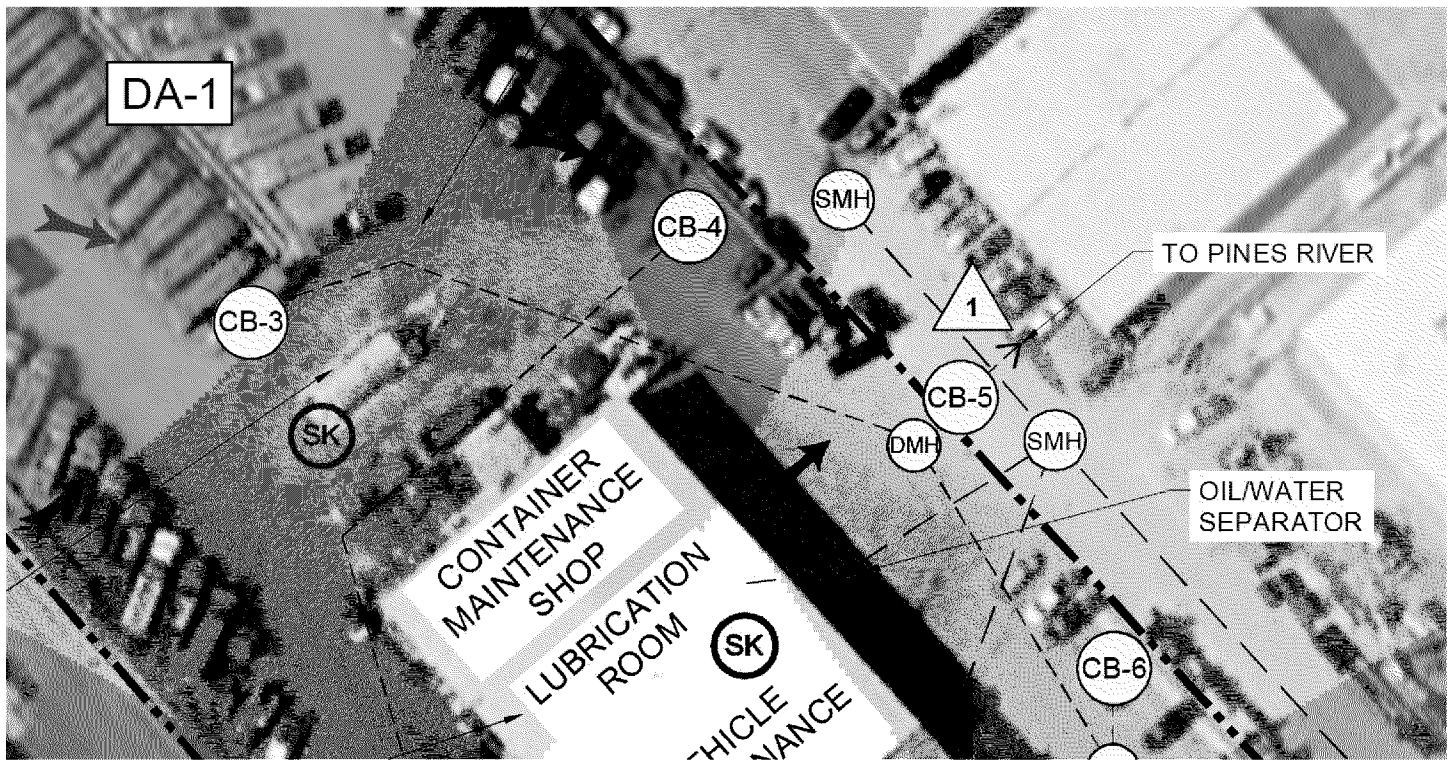


Figure 1 – Portion of Site Map from 5/28/21 SWPPP

Section 4.2.4. of the 2021 SWPPP states that the Facility implements a preventative maintenance program that involves routine inspections and maintenance of Facility equipment and Structural Control Measures (“SCMs”). The 2021 SWPPP also states that the Facility will maintain the SCMs such that they stay in effective and operating condition by performing routine maintenance. Preventive maintenance is coordinated and documented by the SWPPP Coordinator and/or Team Members., and these efforts include the completion of inspections and preventive maintenance of SCMs, and Facility equipment and systems that could fail and result in contamination of stormwater.

Section 4.2.7. of the 2021 SWPPP states that “the vehicle bays in the Vehicle Maintenance Shop are equipped with a floor drains that are piped to an oil/water separator which discharges to the sanitary sewer system.” The Facility’s Notice of Intent to discharge dated May 21, 2021 also states that the OWS from the wash bay discharges into the sanitary sewer. The 2021 SWPPP site map, includes the depiction of a discharge route from the indoor OWS into the sanitary sewer.

Facility representatives’ statements and the 2012 SWPPP site map both indicate that the indoor oil water separator no longer (since 2013) discharges to the sanitary sewer system.

At the time of the inspection, benchmark monitoring data did not indicate the presence of pollutant concentrations in excess of benchmark concentration thresholds.

The SPCC plan I reviewed was dated May 17, 2012, and had a recertification signature dated April 26, 2024. All tanks listed within the plan were observed during the inspection. A couple of 55-gallon drums located in the Lubrication Bay did not have their own respective sized secondary containment. It was discussed that the building and its internal drains might provide adequate secondary containment, if the holding tank does not discharge to the sewer system.

D. Closing Conference

I went over some observations regarding compliance with the MSGP including:

- The 2012 SWPPP was required to be updated based on the reissuance of the MSGP in 2021;
- Site maps and narrative SWPPP language must be updated to represent current conditions;
- Structural Controls Measures (SCMs) for stormwater pollution control as described in the SWPPP must be implemented (i.e. hay bay bales, etc.);
- SCMs (i.e. OWS) require regular inspection and maintenance; and
- Stormwater samples for monitoring must be taken at a location that is representative of all the industrial activity occurring on-site.

Facility representatives stated that Republic Waste Systems Inc. has multiple locations within New England. Operations located in Roxbury, Quincy and Holbrook were mentioned by staff.

I departed at approximately 12 p.m.

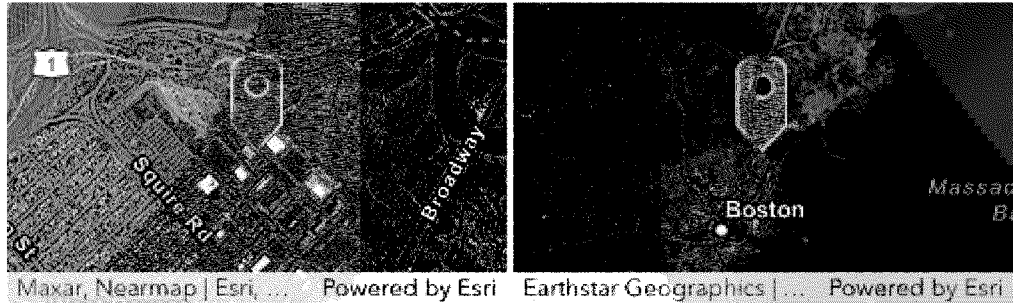
Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further.

Enclosures

PHOTO LOG

Photo Log

Project: Casella Waste Systems, Revere, MA



Photos:

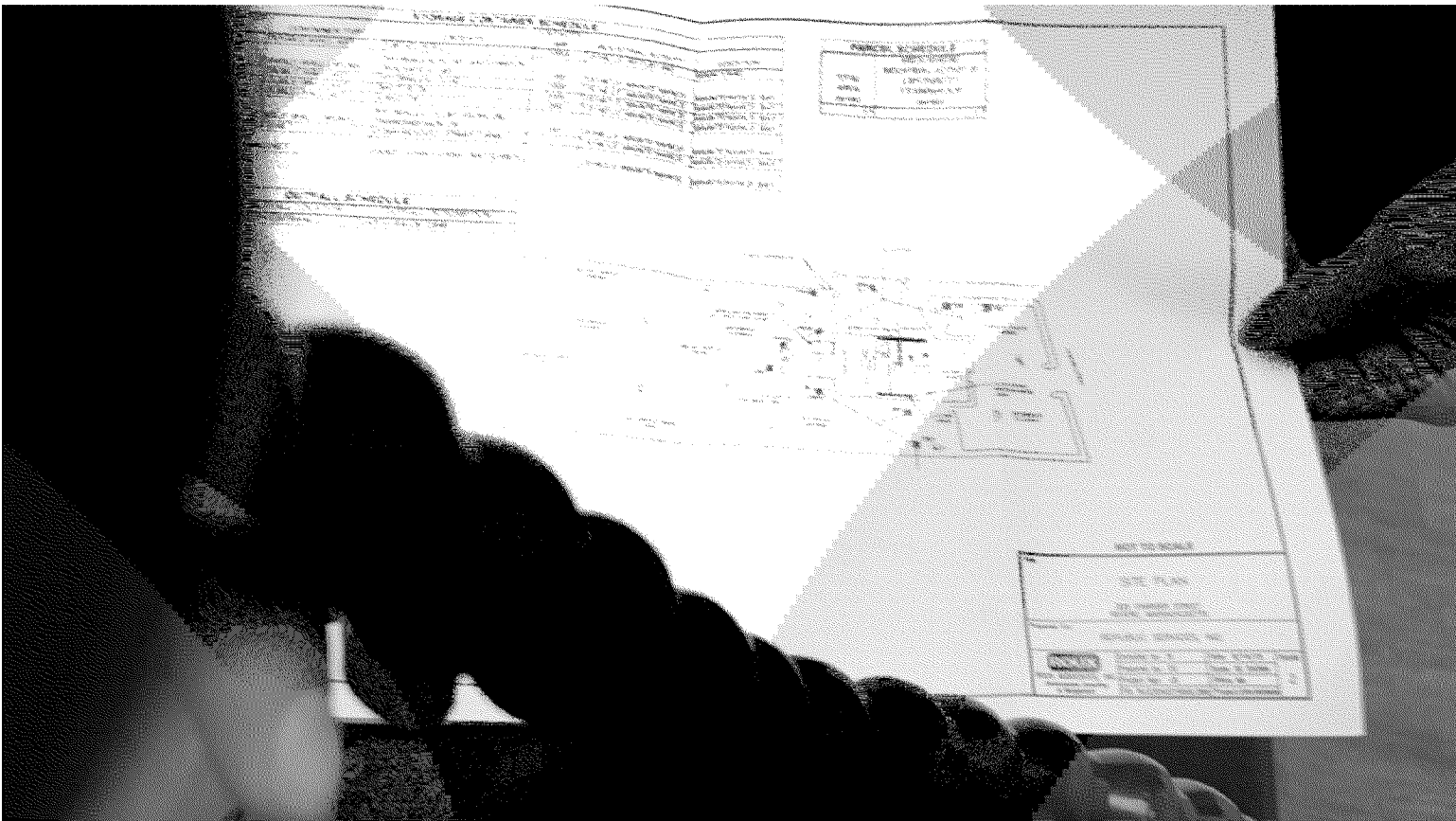


Photo 1: 2012 SWPPP MAP

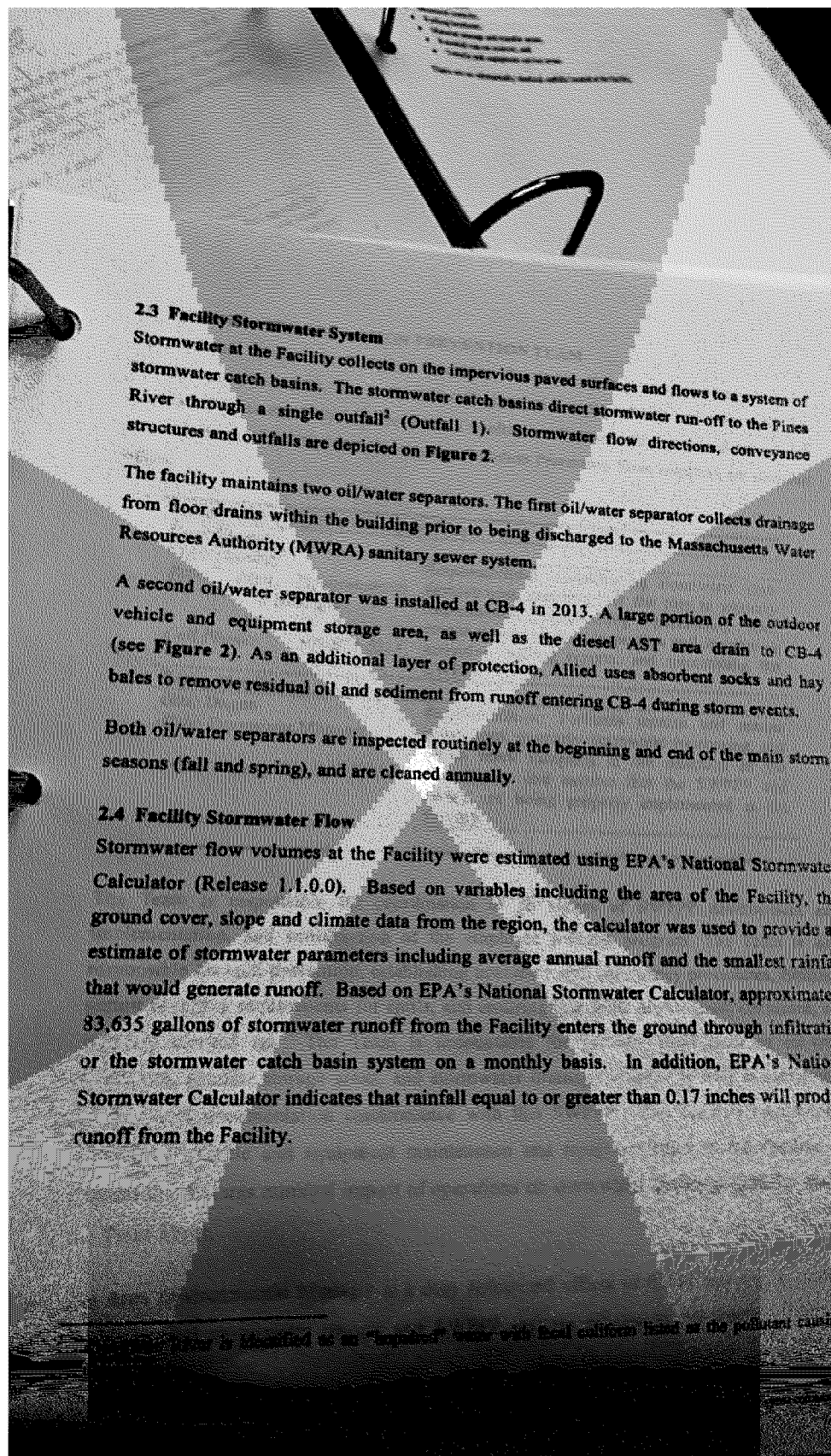


Photo 2



Photo 3



Photo 4



Photo 5

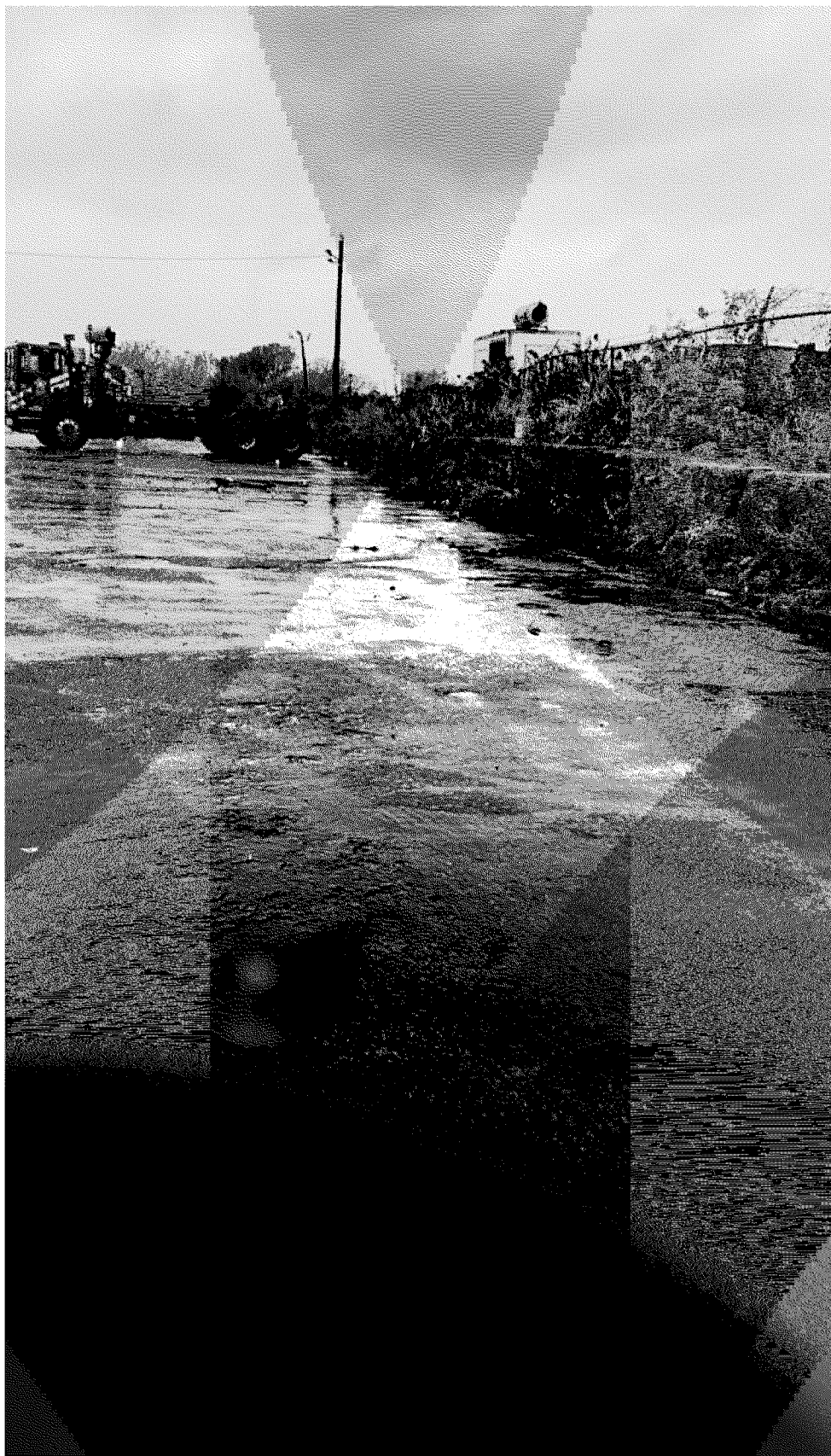


Photo 6

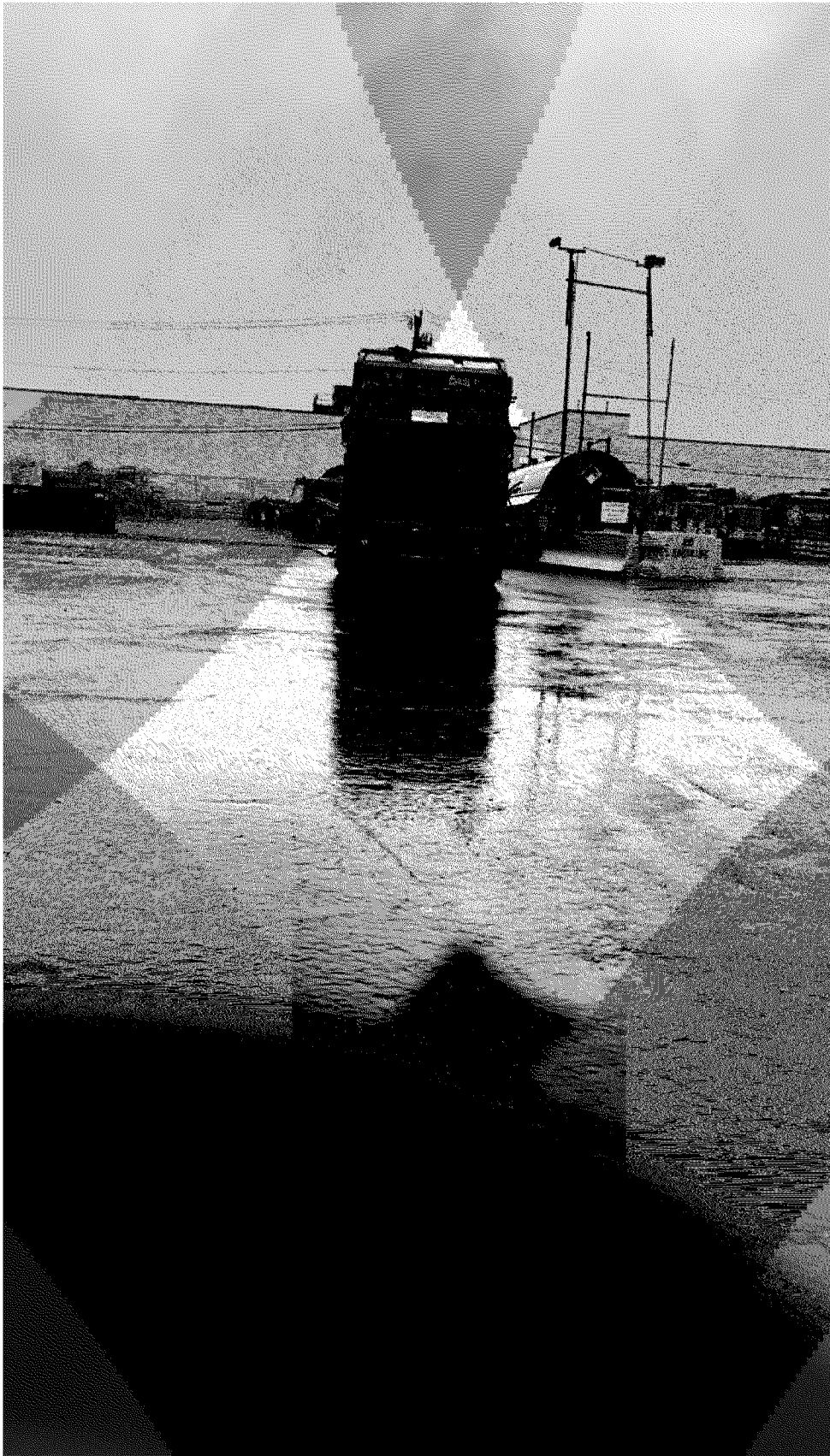


Photo 7

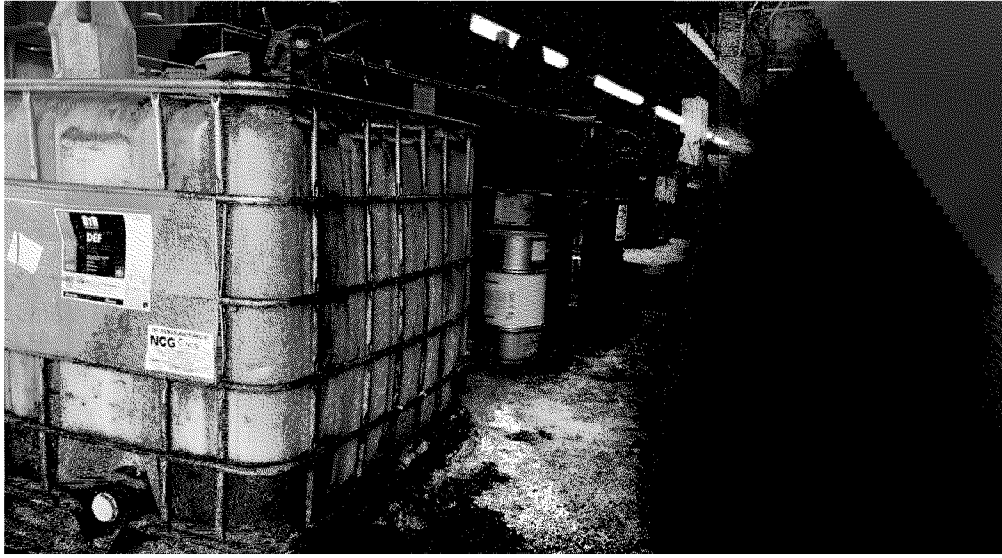


Photo 8



Photo 9

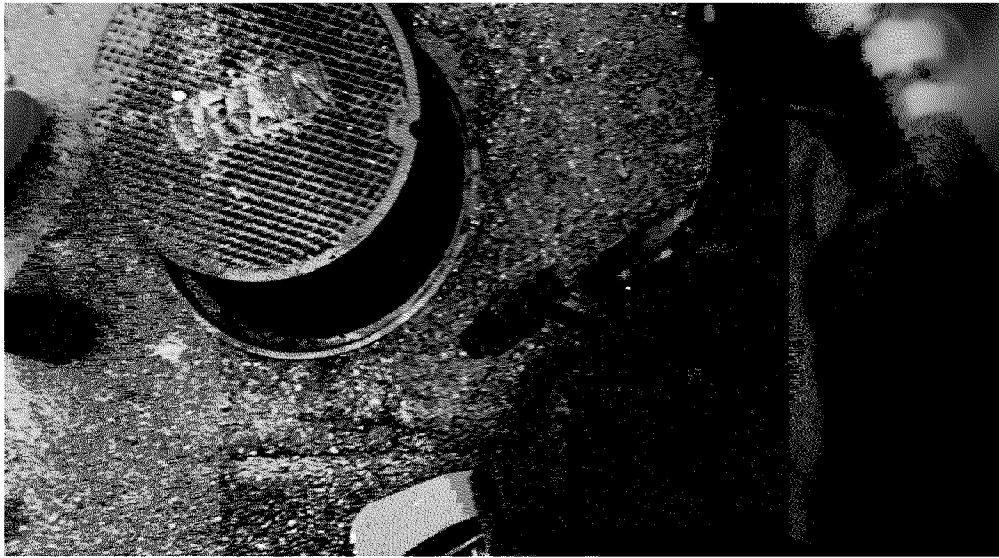


Photo 10



Photo 11



Photo 12