



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

Boston, MA 02109-3912

Sent via Electronic Mail (*Dated as shown on electronic signature*)

Jay Chicca, Maintenance Manager
MEGA Disposal
19 Industrial Way
Seekonk, MA 02771

Subject: July 21, 2023, EPA Inspection of MEGA Disposal Facility in Seekonk, MA.

Dear Mr. Chicca:

On July 21, 2023, the U.S. Environmental Protection Agency ("EPA") performed an inspection at MEGA Disposal, located at 19 Industrial Way, Seekonk, MA ("the Facility" or "site"), regarding compliance with the National Pollutant Discharge Elimination System ("NPDES") program of the Clean Water Act ("CWA"). A copy of the inspection report is enclosed with this letter.

Please review the attached inspection report and provide a response to each of the numbered sections below within 30 days of the receipt of this letter to Damian Bednarz, EPA Inspector, at bednarz.damian@epa.gov.

1. EPA Inspectors observed a stormwater grate within one of the Facility's structures (see green outline on slide 91 in the photo album). Describe the nature of work conducted within this structure and where this catchment discharges. Additionally, the Facility's Stormwater Pollution Prevention Plan ("SWPPP") does not display this drain on its site diagram. Update the site diagram accordingly and provide Mr. Bednarz an updated site diagram.
2. Describe the Facility's weekly vehicle washing procedures. Provide the number of vehicles washed on an average wash day, how the washing is conducted, and whether soaps, solvents, or detergents are used in this process. The SWPPP describes that the wash waters are left in puddles to dry, however, the northeast section of the Facility is sloped so that water runs into a catchment basin that leads into an oil/water separator ("OWS") and then into the Municipal Separate Storm Sewer System ("MS4"). Provide the location where wash water puddles and an explanation including quantitative calculations of how the Facility ensures no wash water enters the MS4. During the inspection, Facility staff mentioned that process water is contained, collected, and disposed of. Explain the discrepancy between the process explained during the inspection and what is written in the Facility's SWPPP.
3. Describe how the Facility monitors oil levels within the OWS. From the Facility's SWPPP, the OWS has an oil storage capacity of 191 gallons. Provide dates and/or

records of when the oil has been emptied from the OWS, and when the OWS has undergone maintenance since January 1, 2022. Further, describe the full process for disposing of the captured oil.

If you have any questions related to this letter, please contact Damian Bednarz of my staff at (617) 918-1482 or bednarz.damian@epa.gov.

Sincerely,

Todd Borci, Manager
Water Compliance Section 1
Enforcement and Compliance Assurance Division

Enclosures:

Inspection Report for July 21, 2023, EPA Inspection
Photo Album for July 21, 2023, EPA Inspection

CCs (electronic only):

Susannah King, MADEP
Dan DiSalvio, MADEP
Jeff Kopf, EPA
Damian Bednarz, US EPA

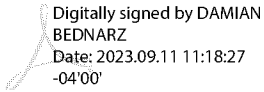


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
MEGA Disposal

From: Damian Bednarz, Inspector **DAMIAN
BEDNARZ**  Digitally signed by DAMIAN
BEDNARZ
Date: 2023.09.11 11:18:27
-04'00'

Thru: Alex Rosenberg, Inspector

To: File

I. Facility Information

A. Facility Name: MEGA Disposal

B. Facility Location: 19 Industrial Way
Seekonk, MA 02771

Facility Contacts: John Welch, Controller
Jay Chicca, Manager

774-501-2176, Jay.chicca@wasteconnections.com

D. NPDES ID No(s): MAR05J049

II. Background Information

A. Date(s) of inspection: July 21, 2023

Weather Conditions: Cloudy, 75°

B. US EPA Representative(s):
Damian Bednarz
Jeremy Rolfe

C. State/Local Representative(s):
N/A

D. Federally Enforceable Requirements Covered During the Inspection:

40 C.F.R. § 122.26 – NPDES Multi-Sector General Permit (“MSGP”) for Stormwater Discharges Associated with Industrial Activity (issued January 15, 2021, modified September 29, 2021)

E. Previous Enforcement Actions:

No previous enforcement actions known.

III. Type and Purpose of Inspection

United States Environmental Protection Agency (“EPA”) inspectors conducted an evaluation of the Facility described below to determine compliance with MSGP for Stormwater Discharges Associated with Industrial Activity.

IV. Facility Description

MEGA Disposal, referred to hereafter as “MEGA”, is a waste truck repair and refueling yard located at 19 Industrial Way, Seekonk, MA 02771 (“Facility”). The waste trucks primarily collect residential waste, including yard waste, for end-of-life disposal in landfills. Construction waste in roll-off containers is also collected.

The Facility is in a large corner lot, surrounded by a chain link fence with three entrances. Inside the fence there is a single large building with multiple working bays for short and long-term maintenance of MEGA’s fleet of trucks. Additionally, there is parking area available for the fleet that rings the entire Facility. The main areas of industrial activity are the north half of the maintenance building, the northwest section of the parking lot, and the southern lot.

The main business of the Facility is the maintenance of garbage trucks. MEGA’s parent company is Waste Connections which operates a number of waste transfer stations and garages in New England.

On the western area of the southern parking lot there is a refueling station with a double-walled 9,990-gallon diesel tank above a concrete slab. There are two fuel pumps at this station, one for diesel and one for diesel exhaust fluid (“DEF”).

There is a long concrete berm along the north side of the Facility, but it does not continue the entire length of the north parking area. Beyond the berm is a grass median between the berm and the lot fence. At the far northwest of the Facility, beyond the berm, there is a shallow retaining pond beyond the paved area and a metal guardrail, but inside the fenced property boundary. This pond directly abuts the lot fence and a large, wooded area at the rear of the Facility.

V. Inspection

EPA inspectors arrived at the Facility at approximately 10am.

A. Opening Conference

Mr. Bednarz and Mr. Rolfe (“Inspector Team” or “Inspectors”) arrived at 19 Industrial Way at approximately 10AM. Inspectors announced themselves to the front desk and asked the receptionist if a shift manager or Facility manager was available to speak with them. The receptionist said Mr. John Welsh, who has the title of “Controller”, was present and that he would meet with the Inspectors soon. Upon greeting Mr. Welsh, Inspectors presented credentials and stated the purpose of the inspection, and asked if a conference room was available to entertain questions about the operations of the Facility.

Mr. Welsh informed inspectors that the majority of MEGA’s management team was out on a conference trip in New York and that he was the only manager available. Mr. Jay Chica is the Facility’s usual manager, and his contact information was provided to the inspectors. Mr. Welsh attempted to call Mr. Chica, but he was unavailable at this point in the inspection. Furthermore, Mr. Welsh did not know where the Storm Water Pollution Prevention Plan (“SWPPP”) and Spill Prevention Control and Countermeasure (“SPCC”) documents were without Mr. Chica being present, so they were not reviewed at this point in the inspection. EPA inspectors were told that both plans would be available after the site walk around and are discussed in the closing conference section of this report.

The Facility itself has 150 employees and has personnel onsite from 3 AM to midnight, Monday through Saturday. There are gates that are closed after main business hours and outside lights. The Facility also has outdoor security cameras that face the parking lots and fueling tank, which is locked via a code box that only the drivers have access to. Waste truck drivers are responsible for fueling their own vehicles and use personalized credentials to utilize the fuel tanks.

The inspection team asked which environmental consultant MEGA uses and was told it was Civil and Environmental Consultants, Inc. (“CEC”). CEC prepared the Facility’s storm water pollution prevention plan (“SWPPP”) and oil spill pollution control and countermeasures (“SPCC”) plan as well as having filled out the quarterly sampling logs for the Facility, as required within the MSGP. EPA inspectors were told that CEC also uploads sample results to EPA’s online portal, NetDMR.

When Inspectors asked questions regarding the Facility’s drainage plan, oil-water separator, stormwater control measures, and outfalls, Mr. Welsh did not express familiarity of these items. Nor was Mr. Welsh familiar with the Facility’s SWPPP and its contents. Mr. Welsh explained that Mr. Chica is most knowledgeable of the Facility’s SWPPP.

Inspectors asked about the fueling practices of the waste trucks. Mr. Welsh stated that the trucks typically refill every day with diesel and as needed with DEF. The drivers do the fueling themselves via the 9,990-gallon tank located onsite. Access to the tank is controlled via a code box located between the DEF and diesel tanks. Every truck driver

has a unique code to the box to track fuel usage. Mr. Welsh stated that they typically intake “50,000 gallons” of diesel per month to refill their tank. EPA Inspectors asked about small fuel carts or totes used on site. Mr. Welsh stated that he was unaware of any being used for the purposes of mobile refueling.

When asked about safety and spill training, Mr. Welsh stated that there are periodic training sessions regarding what to do in the event of a spill as well as “safety meetings” every morning. During these morning safety meetings, the topic of oil spill prevention and clean-up is briefed. Mr. Welsh stated that every truck has a spill kit on it and the drivers are trained in its application.

Inspectors asked about truck washing. Mr. Welsh stated that they employ a third-party washing service for their trucks, typically every weekend. Mr. Welsh stated that this service washes the trucks on a deployable “pad” that is designed to capture the waste wash water. Mr. Welsh stated that he does not believe any of this water goes into their outside drains. However, he stated that in the future MEGA was going to move their washing into a third truck bay and utilize their drains which are tied into the Facility’s oil-water separator system.

Mr. Welsh was then asked about site security. He stated that there are cameras that point out into the parking lot. The three entry gates are locked and closed at night. The Facility is typically staffed from 3AM to midnight, Monday through Saturday. The Facility is only unstaffed on Sunday and holidays.

At this time in the inspection, as the Facility manager was unable to answer his phone to answer more site-specific questions, inspectors and Mr. Welsh began the Facility tour. The manager, Jay Chicca, would be available for the post-inspection conference.

B. Facility Tour

Immediately upon exiting the office section of the main building, inspection team went through a gate into one of the main parking lots for the MEGA trucks (slides 2-4). This parking lot, according to Mr. Welsh, was paved approximately 2 years prior to this inspection. Before paving, the surrounding lot was primarily composed of dirt, as seen in satellite imagery (slide 96). Inspectors noted dozens of parked garbage trucks (slide 4) against the side of the building or the perimeter of the fence. The parking lot had not been recently cleaned as there were numerous spots of spilled oil, spill kit residue (kitty litter), and paper or solid trash waste (slides 2, 3, 5, 6, 7).

Inside the main building there are four large vehicle bays, divided into two maintenance areas. One is for “everyday” maintenance such as oil changes, filter changes (termed “preventative maintenance bay” on slide 91), and the other is for long-term maintenance. At the front of the main building is the office area which is two levels tall. A further temporary bay was erected at the end of the building made of strong canvas material. Facility representatives stated that its’ purpose will eventually be for truck washing.

The parking lot itself is sloped toward several storm drains that Mr. Welsh said ultimately ended up in the Facility's oil/water separator system (OWS) (slides 24, 29, 79) before discharging to Outfall 001 (slide 91). The gradient towards the catchbasins from the garage is significant enough to easily be seen with the naked eye. Standing oily water was observed inside all catch basin grates, as well as within a tie-in pipe from the building's gutters and from other catch basins (slides 24, 29).

There is a large concrete berm along the Northern edge of the property (slide 6). Behind the berm is a grass median between MEGA and the adjacent properties, which are further separated by a chain-link fence that runs the entire length of MEGA's property. This berm extends to the last parking spot (slide 7).

After observing the parking lot's characteristics, the inspection team moved to the first of the two vehicle bays (slides 4, 91). Mr. Welsh identified this building as the "preventative maintenance bay". Refilling of hydraulic fluid and oil/fluid changes take place in this bay. In addition, small repairs of the garbage trucks are done here. Trucks worked on in this bay remain in "operating condition". Mr. Welsh described the nature of these repairs to be short term.

Immediately upon entering the bay, inspectors observed two large plastic totes for washer fluid (slides 8, 9). Around the bay there were Petro-Canada 54.2-gallon drums of hydraulic oil (slide 10). At the back of the bay was the site's waste oil burner system as well as a large container with a flap top for used oil filters (slide 11, 12).

All waste oil is put into a tank system that feeds into the burner when operating. Otherwise, waste oil is pumped out by a third-party service when it is too hot in the year (burner not run often). This system consists of two tanks (slides 13-15) as well as mobile oil capture units that could be rolled under the trucks for oil changes and then pumped into the oil tanks (slide 16).

There were many black and blue buckets of hydraulic fluid, all less than 55 gallons in total volume, that were filled to various extents (slides 17, 18). Additionally, there is a sink for washing tools and small containers that drains into its own 55-gallon (estimate) drum as well as a covered trash can for oily rags (slide 19).

Upon exiting the preventative maintenance bay, inspectors returned to the parking lot. Mr. Welsh stated that one of his maintenance managers, Bob Fox, was on-site and could join them to answer any specific questions around maintenance. Mr. Fox would continue the Facility tour with EPA Inspectors and Mr. Welsh. EPA Inspectors observed that many trucks had leaking fuel tanks (slides 23, 26, 27, 28). Additionally, beginning approximately half-way up the berm, the grass median between the berm and the fence became a small collection ditch (slides 44, 46, 47) that potentially partially emptied into the adjacent property where a larger constructed ditch is present (slide 45). The concrete berm ends at this point and becomes a guard rail (slide 49) which does not prevent stormwater from entering the small collection ditch. This ditch ends in a retaining pond (slides 50, 51) which at the time of the inspection held standing water. This pond

potentially exits the property via a low rocky creek (slides 61, 65). It is unknown where this creek leads to.

Inspection team asked Mr. Fox questions regarding the waste oil system, such as the total oil capacity of the system. Mr. Fox stated the system is composed of two tanks containing 500 gallons each. Further, Mr. Fox explained the service that disposes the oil when it is not being burned is Western Oil. When EPA Inspectors asked about the truck washing, Mr. Fox explained that a third-party business lays a catchment tarp in the parking lot and collects the wash water for later disposal. This vehicle washing is conducted weekly. After the inspection, a more thorough review of the Facility's SWPPP was conducted, and information received from MEGA personnel did not coincide with truck washing operating procedures included in the SWPPP. Mr. Bednarz asked about the practice of capturing and removing process waters from washing. Both Mr. Welsh and Mr. Fox stated that the 3rd party service place a barrier around the truck that pools the water and is later disposed of by the same service.

EPA Inspectors moved to the end of the large building to look at the newest structure on the site, which is a large canvas vehicle bay (slide 30). During the inspection a garbage truck was partially disassembled inside of it. Mr. Welsh stated that eventually the business plans to conduct truck washing in this bay, but right now it is used as an additional long-term maintenance bay. Inspectors observed pulled fuel tanks (slides 31, 54) that appeared to have a small amount of residual fuel still in them. EPA Inspectors noted a catch basin underneath this truck (slide 79, 91). After a review of the SWPPP post inspection, this catch basin is not included on the site diagram.

Directly between this temporary bay and the main building is an alleyway which MEGA uses to store its empty oil and hydraulic fluid barrels to return to Petro-Canada (slides 33-40). There were approximately two dozen barrels awaiting collection, with roughly a third in secondary containment (slide 34). The barrels in secondary containment were much more dilapidated than the ones without. Some barrels were missing caps. The barrels were listed as being 54.2 gallons each (slide 34). There is a sheet metal overhang of about 5 feet protruding from the building that the barrels sit under (slide 41).

Directly behind the temporary bay is a scrap bin with crushed barrels and other waste (slide 56). This bin is uncovered and shows signs of leaking (slide 57).

The inspection team then moved to the 9,990-gallon diesel tank (slide 58). This tank is on a concrete pad separate from the paved parking lot, with enough space for both the pad and two trucks to pull up (one on either side; inspection team directly observed this transfer process later in the inspection). The DEF tank is directly north of the diesel tank and is 1,350gl (slide 60). The pump is between the two tanks and has two nozzles (slide 59) while the DEF tank has one pump in its own compartment on the DEF tank (slide 62). The bottom of the DEF box was rusted and the concrete dilapidation (slide 63). In this same metal enclosure, there is a code box (slide 65) for authorized use. The diesel pump has its own locked compartment box (slide 68). Inspection team observed oil sheen on the standing water around the diesel tank (slide 64).

The diesel tank itself is double walled and manufactured by the Steel Tank Institute (slide 76). Mr. Welsh stated that he was not aware of how often the tank is inspected from the inside. There were no signs of rust on the tank around the welded joints (slides 76, 77). There was, however, some signs of rust and corrosion on the pipes flowing into the tank (slides 73-75). The diesel inflow cap was inside a welded box (slides 83, 84) that contained a minimal quantity of less than a half-gallon inside a custom-cut plastic receptacle (slides 69-71). A 5-gallon bucket full of oily-water sat underneath the tank's piping (slide 72).

Inspection team then entered the long-term maintenance bay. This is where major work is performed on the trucks, although Mr. Welsh stated that they hire 3rd parties to do heavy repair as well. This bay had its own Clean Burn oil burning system, the same as the previous one observed in the routine maintenance bay (slide 80) with one difference being that there was a grated oil capture pad for dumping in waste oil and allowing oil containers to drip empty on top of one of the collection tanks. This pad is connected to the main tank via a metal pipe (slide 81).

Inside this bay were two large Environ AW32 Hydroil Oil tanks (slides 82, 83). These tanks were double-walled and were 500 gallons each. There were additionally several palletted Petro-Canada tanks of oil, the same size and capacity as the others observed and documented on the site (slide 84) with some being empty and ready for Petro-Canada pick up.

The bay is cleaned by a large floor sweeper and washer (slide 86) that washes dirt, debris, and any spilled oil into the outside drainage system. The maintenance bays do not have floor drains.

Directly outside the long-term maintenance bay, on the far side of the diesel tank, is the oil/water separator (slides 87-89). Mr. Welsh stated that he was not aware of the maintenance schedule of the OWS or the make and model. According to the site diagram (slide 92) found in both the SWPPP and SPCC plans, all the site's stormwater drains run to this OWS before going into Seekonk's MS4 system. Inspectors observed standing oily water in this drain as well as a large sediment sock inside the intake pipe. Inspectors did not observe the water moving inside the system at the time of the inspection.

C. Records Review

No records were reviewed prior to this inspection.

D. Closing Conference

Upon returning to the Facility's conference room, EPA Inspectors asked Mr. Welsh to contact Mr. Chica to locate the Facility's SWPPP and SPCC plans should they be on site. Mr. Chica described where the plans were, and Mr. Welsh brought them to the conference room. During this time, Mr. Bednarz remained on the phone with Mr. Chica, and asked questions about observations made at the Facility that were not answered

during the walk around. Mr. Chica explained that all drains within their property lead into one another, and eventually all flow enters the oil/water separator. This was evident in the SWPPP drainage map (slide 92). When asked about the general containment requirement of the fueling operation, Mr. Chica explained that all garbage trucks have a spill kit on them (slide 78). Mr. Bednarz asked about the oil/water separator and what rate of stormwater drainage it is rated for, and Mr. Chica explained that specifics of this technology should be found in one of the two plans. When the SWPPP was available, Mr. Bednarz requested a copy of both it and the SPCC plan to be sent to him post inspection. Within these documents, training and inspection logs were left blank. Mr. Bednarz asked if these documents were stored elsewhere, perhaps on an internal digital database. Mr. Chica confirmed and said he should have no trouble getting these documents sent to EPA post inspection. Should questions arise regarding these aforementioned items, Mr. Bednarz would email Mr. Chica and other Facility representatives to obtain further information. Contact information was exchanged between EPA Inspectors and MEGA Disposal staff. Mr. Bednarz explained that an inspection report will be sent to the Facility within 60 days from the date of this inspection.

EPA Inspectors departed at approximately 1:00 PM.

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 investigation or action.