Industrial User Facility Inspection Report
U.S. EPA, Region 8

Name of industry and location:	Control Authority / NPDES Permit No.
Veolia ES Technical Solutions, LLC 9131 E. 96th Ave., Henderson, CO 80640	South Adams County Water and Sanitation District NPDES Permit No. CO-0026662
IU – NPDES ID	COPIU001A
Date of visit:	**Approximate Time of visit:**
January 28, 2025	1:30 p.m. - 3:30 p.m.

Name(s) / Affiliation / email of inspector(s):

U.S. EPA:

Al Garcia, garcia.al@epa.gov
Monica Crosby, crosby.monica@epa.gov

South Adams County Water and Sanitation District:

- Gary Bassett, gbassett@sacwsd.org
- Carissa Cumine, ccumine@sacwsd.org

General Facility Information:

Representatives at Inspection:

- Rebecca Doksa - EH&S Manager
- Joe Costa – General Manager

Type of Business Operations:

- Treatment and recovery of hazardous and non-hazardous industrial metal-bearing waters, oily wastes, and organic-bearing wastes received from off-site and the treatment of CWT wastewater.

Facility Information:

- 120 employees
- 24/7, 360 days a year

Inspection Description:

Al Garcia and Monica Crosby from the U.S. Environmental Protection Agency (EPA) and Gary Bassett and Carissa Cumine from the South Adams County Water and Sanitation District (District) conducted a significant industrial user (SIU) inspection of the Veolia ES Technical Solutions, LLC (facility) located at 9131 E. 96th Ave, Henderson, CO 80640. The SIU inspection was conducted as part of the EPA Pretreatment Audit of the District's Publicly Owned Treatment Works (POTW) and EPA-approved Pretreatment Program. The inspection of the facility provides current conditions of the facility's unit operations and consisted of an evaluation of the waste

streams generated from the unit operations, and the management of these waste streams, including potential for spills and slug discharges. The facility discharges to the sewer collection system leading to the District's POTW.

Upon arriving at the facility on January 28, 2024, at approximately 1:30 p.m., Al Garcia and Monica Crosby of the EPA presented credentials to the facility representatives and explained the purpose of the inspection. The inspectors then explained the general purpose and procedures of the inspection. During the opening conference, the facility representatives provided an overview of the facility's operations, focusing on the handling/storage of materials and processes that generate wastewater.

Following the opening conference, the facility representatives accompanied the group of inspectors on a facility walk-through, beginning with the loading areas and the facility's four tank farms. The inspection continued north towards the rail car loading area and observed the facility's two retention ponds. The inspectors then observed the facility's storage areas for containerized waste and concluded by observing the facility's permitted discharge point.

The EPA conducted a closing conference with the facility representatives. The EPA did not have any major findings or recommendations during this inspection. The EPA and District representatives left the facility at approximately 3:30 p.m.

Process Description:

The facility located at 9131 E. 96th Avenue, Henderson, CO transfers, stores, and treats hazardous and non-hazardous waste. The facility has about 120 full-time employees and operates 24 hours a day, seven days a week, 360 days a year. The Google Maps view of the facility is shown in Figure 1.

Figure 1 – Veolia ES Technologies -Google Earth Pro View

Chemical and Raw Materials Storage –

The facility receives raw materials via tanker truck, truck, or rail car. Prior to receipt of any hazardous waste from generators/customers, the waste is profiled to determine the type of waste, if the facility will accept the waste, and to determine the treatment/storage of the waste. Once the hazardous waste is profiled, it is given a waste information profile sheet. Based on this information, a delivery schedule is applied. Containerized waste received at the facility for storage, treatment, or processing is offloaded to one of the permitted waste storage areas. During the receiving process, each container is marked with required receiving information. The containers are segregated and stored in the staging area until they can be sampled and classified. Based on the analytical information, a waste plan is generated that outlines whether the waste will be consolidated with compatible material, recycled, or stored for transfer. Reactive wastes are received directly into the warehouse for segregated storage.

Containerized waste is loaded into one of the facility's two warehouses located on the north side of the property. Storage area #1 has a capacity of 3,200 55-gallon drums or 176,000 gallons. Roll-off bins for storage and/or consolidating waste are also stored here. Storage area #2 has a capacity of 1,830 55-gallon drums or 100,650 gallons. This storage area is designed to receive shipments of containerized wastes by their compatibility code. The containers are segregated into storage bays designed to store materials according to compatibility codes. Containerized waste can either be de-packed (consolidating the materials into smaller containers) or repacked (rearranging smaller containers). Materials that are delivered in drums are stored until there is enough material that is shipped off to another Veolia facility or to a third-party facility.

Materials received through tanker trucks and rail cars are distributed into one of the facility's four tank farms via an above-ground piping system. Tank Farm #1 has ten waste storage tanks; all ten tanks are used for hazardous waste storage and hold 54,000 gallons of waste. Tank Farm #2 has six tanks that also used for hazardous waste and store 31,000 gallons. Tank Farm #3 has 12 tanks; five are used for hazardous waste and hold 46,000 gallons; the other seven tanks are used for product and have the capacity of 61,380 gallons. Tank Farm #4 has seven 13,000-gallon tanks that are all used for product storage.

Wastewater Treatment –

The facility has several different processes for treating hazardous waste, including:

- Neutralization
- Filtration
- Phase Separation
- Thin Film Distillation
- Fractional Distillation
- Liquid/Liquid or Liquid/Solid Extraction
- Supplemental Fuels Blending
- Solidification
- Water Use

According to facility representatives, water is used in the cooling towers as part of the thin film distillation and liquid extraction processes. Water is also used for rinsing tanks and decontaminating the distillation unit.

Regarding thin film distillation, waste solvents are recovered in thin film distillation by heating liquid wastes to a gaseous phase, then allowing the clean solvent product to condense and accumulate. The thin film evaporator can treat 600 gallons per hour. A hot oil heater provides the energy for this operation. Wastewater from the condensers is non-contact cooled in a cooling tower northeast of the distillation unit. In the unit's heat exchanger section, waste is heated using heated oil. Water-cooled condensers receive vaporized fractions. The condensers route their vent to a refrigerated condenser. The liquid extraction process is used as a treatment

method to recover materials in a received waste that contain undesirable components. Liquid/liquid extraction uses water to remove undesired impurities. Liquid/solid extraction involves adding a solid reagent that helps separate the unwanted part of the material. The extractants are sampled in preparation for further processing. When rinsing the tanks, rinse water is pumped to a different tank or drum for further processing.

Discharge –

Waste from the distillation treatment process is the only process water permitted to go into the District's sanitary sewer. Rail cars are used to transport a corrosive solvent waste stream from an off-circuit board producer. The waste stream is pumped to a special tank, where sulfuric acid is used to neutralize the pH and store the raw wastewater. Neutralized wastewater is pumped to one of the facility's two storage tanks; it is then pumped to one of two Evaled Distillation Machines. Finished distillate wastewater is then pumped to one of three wastewater storage tanks, where it will be circulated and mixed for a period of time and then sampled during mixing from the 001 sample point. The facility has not discharged to the District since 2020. At the time of the inspection, there was a padlock on the discharge valves that only the District has a key to. When the facility wants to discharge, they notify the District and the District unlocks this valve.

No wastewater outside of outfall 001 can leave the property. The facility is protected with earthen berms, containment areas, and/or blind sumps around each loading area and tank farm. The facility also has two clay-lined retention ponds and is graded in a way so that anything that leaves containment would flow to the retention ponds. Waste that enters the retention ponds evaporates, but if there is any leftover material, it would be treated as hazardous waste.

EPA Classification of the Industrial User

Based on observations and information received during the inspection, the facility is categorized as a facility subject to Organics Treatment and Recovery and found at 40 C.F.R. § 417, Subpart C. The Categorical Pretreatment Standard for New Sources (PSNS) for Organics Treatment and Recovery is found at 40 C.F.R. § 417.36.

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
MONICA CROSBY Digitally signed by MONICA CROSBY Date: 2025.02.26 13:20:03 -07'00' **Monica Crosby**	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-NW Denver, Colorado 80202 303-312-6196	**02/19/25**
Reviewer Name	Address/Phone Number	Date
Al Garcia	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202 303-312-6382	**02/20/2025**
Supervisor Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2025.02.26 16:34:17 -07'00' **Emilio Llamozas**	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-NW Denver, Colorado 80202 303-312-6407	**02/26/2025**