

Information Pertaining to the Discharge of Hazardous Waste to the Sanitary Sewer

On July 24, 1990, the Environmental Protection Agency (EPA) promulgated changes to the general pretreatment regulations that requires Industrial Users (IUs) to submit to the POTW a notification of hazardous wastes discharged to sewers. An Industrial User is any non-residential user that discharges non-domestic wastewater to the City sanitary sewer system.

Notification

Any user that discharges listed or characteristic RCRA hazardous wastes to the sewer must notify the City Pretreatment Coordinator in writing of such discharges. Listed and characteristic wastes are described in the Code of Federal Regulations at 40 CFR Part 261 (Subparts C and D). In addition to notifying the City, the IU must also notify the EPA Regional Waste Management Division Director and State of Louisiana.

Waste Covered by the Notification

- Any discharge to the sewer of >15kg of a RCRA hazardous waste, or a discharge of any quantity of an acutely hazardous waste identified in 40 CFR 261.30(d) and 261.33(e), must be reported once.
- A discharge to the sewer of <15 kg of a RCRA hazardous waste during a calendar month need not be reported, except for the acutely hazardous wastes identified in 40 CFR 261.30(d) and 261.33 (e). A subsequent discharge of >15 kg per calendar month, or of any quantity of an acutely hazardous waste, must be reported once.
- Pollutants already reported under 40 CFR 403.12(b),(d) and (e) are not subject to this notification requirement.

Notification Must Contain

1. Notification must contain the following items of Information:

- Name of the hazardous waste as set forth in 40 CFR Part 261.
- EPA hazardous waste number.
- Type of discharge to the sewer (continuous, batch or other).
- A certification that the IU has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

2. If the IU discharges >100 kg of hazardous waste per calendar month to the sewer, the one-time notification must also contain the following items of information, to the extent such information is known and readily available to the IU.

- An identification of the hazardous constituents contained in the hazardous wastes.
- An estimation of the mass and concentration of such constituents in the waste stream discharged during the calendar month in which the one-time report is made.
- An estimation of the mass of constituents in the wastestream expected to be discharged during the 12 months following the notification.

How to Count the Volume of Hazardous Waste Discharged

If a hazardous waste is mixed with a non-hazardous process or non-process waste stream and the entire mixture is then discharged to the sewer, the volume of the entire waste stream containing hazardous waste is considered according to the RCRA "mixture rule" in 40 CFR 261.3(a)(2)(iii).

The effect of this rule is summarized as follows:

Characteristic Wastes

These wastes are classified as hazardous because they exhibit one of the hazardous characteristics identified in 40 CFR 261.20-261.24 (ie. They are ignitable, corrosive, reactive or toxic). If these wastes are mixed with non-hazardous material and the mixture is then discharged to the sewer, the notification must be submitted only if the entire mixture actually discharged is >15 kg per calendar month and if the entire mixture discharged still exhibits the characteristic(s).

Listed Wastes

These are wastes that are classified as hazardous pursuant to being listed in 40 CFR 261.30-33. If these listed wastes are mixed with non-hazardous materials and then discharged to the sewer, the entire wastestream is considered hazardous and a notification must be submitted. Thus only if the entire waste stream containing the hazardous waste amounted to <15 kg per calendar month, would the exemption discussed above apply.

When the Notification Must Be Submitted

The rules below are from the original regulations and apply to any future discharge of new pollutants, however, return of this One Time Hazardous Waste Notification is due within 30 days of receipt of this letter to:

Albert dela Cruz, Ph.D.
Department of Environmental Services
345 Chippewa St.
Baton Rouge, LA 70805

- The notification must be submitted no later than 180 days after the discharge of a hazardous waste.
- In the case of regulations under §3001 of RCRA identifying new hazardous wastes, the notification must be submitted within 90 days of the effective date of such regulations.
- The notification need be submitted only once for each hazardous waste discharged, except when there will be a substantial change in the volume or character of the hazardous waste discharged (generally because of a planned change to the user's facility or operations). In case of such a change, the user should notify the Pretreatment Manager in advance.
- The Pretreatment Manager may require such additional reporting of these substances as it deems necessary.

Questionable Wastes

If you have any doubt about whether a mixture discharged to the sewer is hazardous, or if you do not wish to perform any calculations which may be necessary under the mixture rule, 40 CFR 261.3 (a)(2)(iii), then you should submit the one-time notification.

For More Information

General questions may be directed to: Albert dela Cruz, Ph.D. 225-389-5456

HAZARDOUS WASTE NOTIFICATION FORM

This form must be completed and returned by all industrial users to the address below. Under Federal Regulation 40 CFR 403.12 (p) industrial users are required to inform the City of Baton Rouge of any discharge into the sewer which if otherwise disposed of, would be a hazardous waste under 40 CFR 261.

Company Name: _____

Address: _____ Phone #: _____

City: _____ State: _____

Contact Person: _____ Title: _____

Please complete this form by checking either box A. or box B. For either choice also complete C. below. Material that may qualify as a hazardous waste:

A. Are known to not be discharged from this facility
Skip to and complete C. below.

B. Are known or suspected to be present in the facility discharge
Complete rest of section B. and C. below

Hazardous Waste Information: (Use additional sheets if necessary)

Name of Waste	EPA Hazardous Waste Number	Indicate type of Discharge		
		Continuous	Batch	Other(Specify)

If more than 100 kilograms (220 pounds) of any hazardous waste per calendar month is discharged to the sewer, include the following items of information for each hazardous waste, to the extent such information is known and readily available.

Hazardous Constituent Information: (Use additional sheets if necessary)

Name of Constituents	Mass in Wastestream	Concentration in Wastestream	Mass in Wastestream

C. I certify the above information is true and complete to the best of my knowledge. I further certify that the company has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree the company has determined to be economically practical.

Signature of Authorized Representative

Date

Send Completed Form by Date (30 days) to:

Albert dela Cruz, Ph.D., Department of Environmental Services, 345 Chippewa St. Baton Rouge, LA 70805