

RCRA Hazardous Waste Notification Requirements

On July 24, 1990, the US Environmental Protection Agency (EPA) promulgated in the Federal Register changes to the general pretreatment regulations (cf., 55 FR 30082). The changes affected both Publicly Owned Treatment Works (POTW) and Industrial Users (IUs) of POTWs. "Industrial Users" or "IUs" includes non-domestic users such as commercial users and businesses. One of the changes requires IUs to submit a notification of hazardous wastes discharged to POTW sewerage collection systems. It is a pretreatment program Resource Conservation and Recovery Act (RCRA) reporting requirement. This pretreatment program requirement is codified in the Code of Federal Regulations at 40 CFR 403.12(p).

The Oregon Department of Environmental Quality (DEQ) is the pretreatment program Approval Authority for Oregon. The DEQ and federal regulations (cf., 40 CFR 403.8(f)(2)(iii)), require us to notify you of this RCRA reporting requirement. It is one of the requirements of our approved pretreatment program. Pretreatment program RCRA reporting requirements are incorporated into our Municipal Code, The City of Medford and Rogue Valley Sewer Services (RVSS) Sewer Use Ordinances. Following is a brief description of this requirement.

Who Must Notify:

All non-domestic users of the City of Medford Regional Water Reclamation Facility (RWRF) and RVSS sewerage collection and treatment facilities that discharge listed or characteristic RCRA hazardous waste to the POTW (except as described below) must notify the City of Medford RWRF and other regulatory agencies. RCRA listed and characteristic wastes are described in 40 CFR Part 261.

Notification Must be Sent to:

- The City of Medford RWRF
- The EPA Regional Waste Management Division Director, and
- State of Oregon DEQ Hazardous Waste Department

This notification must be submitted in writing for any discharge into the City of Medford RWRF of any substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261.

Wastes Covered by the Notification:

- Any discharge to the POTW of > 15 kilograms (kg) (33 lb.) per calendar month 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 as a one-time notification.
- A discharge to the POTW of ≤ 15 kg (33 lb.) per calendar month of a RCRA hazardous waste need not be reported, except for acutely hazardous waste identified in 40 CFR 261.30(d) and 261.33(e).
- A subsequent discharge of > 15 kg (33 lb.) per calendar month, or of any quantity of an acutely hazardous waste, must be reported as a one-time notification.
- Pollutants already reported under reporting requirements for categorical industrial users in base line monitoring, final and periodic compliance reports are not subject to this notification requirement.

Notification Must Include:

- 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 you have in place a program to reduce the volume and toxicity of hazardous wastes generated to the degree you have determined to be economically practical.

- If you discharge more than 100 kilograms (220 lb.) of hazardous waste per calendar month to the POTW, the one-time notification shall also contain the following information to the extent such information is known or readily available:
 - An identification of the hazardous constituents contained in the 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 waste stream expected to be discharged during the 12 months following notification.

When the Notification Must be Submitted

- If you commenced discharging such wastes before August 23, 1990, you were required to have submitted this notification by no later than February 23, 1991. If you fall into that category and have not yet submitted the notification, do so right away.
- If you commence discharging after August 23, 1990, you must submit the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. In the event the USEPA identifies any additional characteristics of hazardous waste or listing of any additional substance as a hazardous waste pursuant to Section 3001 of Resource Conservation and Recovery Act of 1976 "Identification and Listing of Hazardous Wastes" (40 CFR § 261), you must notify the City of Medford RWRf, EPA and the State of Oregon of the discharge of such substance 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 in your facility operations). In this case, you must notify the City of Medford RWRf in advance.

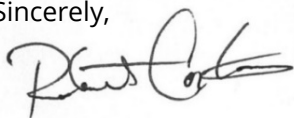
How to Count the Volume of Hazardous Waste Discharged

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 hazardous 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 – 40 CFR 261.24 (i.e., they are ignitable, corrosive, reactive, or toxic). If these wastes are mixed with non-hazardous materials and the mixture is then discharged to the sewer, the notification must be submitted only if the entire mixture actually discharged is > 15 kg (33 lb.) 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 – 40 CFR 261.33. If these listed wastes are mixed with non-hazardous materials and then discharged to the sewer, the entire waste stream is considered hazardous and a notification must be submitted. Thus, only if the entire waste stream containing the hazardous waste amounted to ≤ 15 kg (33 lb.) per calendar month, would the above exemption apply.
- **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 (cf., 40 CFR 261.3(a)(2)(iii)) you should submit the one-time notification.

If you have any questions, please call me at (541) 774-2756:

Sincerely,



Robert Corliss
City of Medford RWRf
Source Control Supervisor



Hazardous Waste Notification Form Instructions

Generator: Complete the following form as completely and as accurately as possible.

A. General Information: Please type or print.

B. Sewered Waste Inventory: Every business which discharges waste must complete this part.

- EPA Waste Code - 4 digit code describing the waste. If waste is non-hazardous, this does not apply; write N/A.
- Waste Name - Give a descriptive name for each waste you intend to discharge.
- Volume per Month - Give volume per month discharged in gallons.
- Dilution Ratio - If waste is diluted, give ratio of waste to water.
- Type of Treatment - If waste is treated before discharge, give type of treatment. (E.g. neutralization, reclamation, ion exchange.)
- Type of Discharge - Enter "C" for Continuous Discharge, "B" for Batch Discharges or "O" for other, if you discharge waste in any other way.

C. Waste Stream Constituents: Complete Part C only if you sewer more than 100 kilograms (220 lb.) per month of hazardous waste. Use existing test data if available.

- Waste Stream Number - identify the waste stream (1,2,3...) from Part B to which each constituent belongs.
- Hazardous Constituents(s) in Waste - name of the constituent(s) in the waste which make it hazardous. (Note: One stream may have more than one hazardous constituent.)
- Concentration of Hazardous Constituent - If available from existing test data, write the concentration of each constituent discharged in the most recent month.
- Mass per Month of Hazardous Constituent - Calculate, in pounds, the mass of each constituent that was discharged in the most recent month.
- Estimated Mass per Year of Hazardous Constituent - Estimate the mass of each constituent you expect to discharge in the next 12 months.
- Type of Test Data - Indicate the name of the test performed on waste. (TCLP = toxicity characteristic leaching procedure).

D. Generator Certification: Read, sign and date the form. Make a copy for your files.



Hazardous Waste Notification Form

A. General Information

Company Name			
Location Address			
City, State, ZIP			
Contact Name		Telephone	

B. Waste Inventory

List all wastes sewered on site. (Attach additional sheets if needed.)

Waste Stream Number	EPA Waste Code (unless N/A)	Waste Name or Description	Volume per Month	Dilution Ratio of Wastewater (if diluted)	Type of Treatment (if treated)	Type of Discharge (B, C or O)
1						
2						
3						
4						
5						

C. Waste Stream Constituents

A business that sewers more than 100 kilograms (220 lb.) per month of hazardous waste must also provide the following information about the waste **before it is diluted**. For each waste stream identified in Part B, list the hazardous constituent(s) contained in the waste. NOTE: There may be more than one constituent per waste stream. Use existing test data if available. (Attach additional sheets if needed.)

Waste Stream Number	Hazardous Constituent(s) in the Waste Stream	Concentration of Hazardous Constituent (most recent month)	Mass/Month of Hazardous Constituent (most recent month)	Estimated Mass per Year of Hazardous Constituent	Type of Test Data (Total Metals, TCLP, etc.)
1					
2					
3					
4					
5					



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WATER RECLAMATION DIVISION

D. Generator Certification

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable.

Name (print)		Title	
Signature		Date	

Generator: Make one copy for your files and mail the original to:

City of Medford RWRF
Attn: Source Control
1100 Kirtland Rd.
Central Point, OR 97502

Send a copy to both the Department of Environmental Quality and the US Environmental Protection Agency at the following addresses:

Oregon DEQ
Hazardous Waste Program Manager
Department of Environmental Quality
700 NW Multnomah St. Suite #600
Portland, Oregon 97232

USEPA Region 10
Director
Office of Air, Waste & Toxics
USEPA Region 10 AWT-127
1200 6th Avenue
Seattle WA. 98102