Hazardous Waste Reporting Requirements for Industrial Users







What is Hazardous Waste?

Listed Waste

A solid waste that is listed in 40 CFR Part 261
 Subpart D; or

Characteristic Waste

 A solid waste that exhibits at least one of four characteristics identified in 40 CFR Part 261

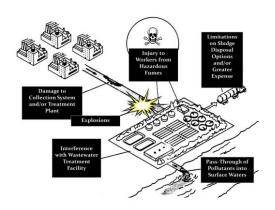


Best Practices Guidance

- Published November 2016
- Hazardous and Toxic Chemicals Regulations
- Identifying IUs
- Permitting

Best Practices for NPDES Permit Writers and Pretreatment Coordinators to Address Toxic and Hazardous Chemical Discharges to POTWs

> EPA-830-B-16-001 November 2016







Best Practices for Identifying Hazardous and Toxic Chemicals

- Information gathering
- Data consideration
- Identifying IUs





Tools for NPDES Permit Writers and Pretreatment Coordinators

- Enforcement and Compliance History Online (ECHO)
- Discharge Monitoring Report Pollutant Loading Tool
- EPA Geospatial Program and GeoPlatform Mapping
- Census and Industry Databases



Notification Requirements

- All IUs that discharge a substance that, if otherwise disposed of, would be characteristic or listed wastes under 40 CFR Part 261 and meet the following criteria:
 - Total hazardous waste discharged is ≥ 15 kg/month; or
 - Waste discharged is acute hazardous waste.
- Hazardous waste notification requirements can be found at 40 CFR 403.12(p).
- Notification must be sent to:
 - Local Sewerage Authority (i.e., POTW),
 - EPA Regional Waste Management Director, and
 - State Hazardous Waste Authority



Notification Requirements (continued)

• When:

- IUs prior to August 23, 1990 no later than
 February 23, 1991
- IUs after August 23, 1990 no later than 180 days after discharge of hazardous waste
- Newly identified hazardous waste within 90 days of the effective date of the regulations

Frequency:

Once for each hazardous waste



Notification Contents

IUs discharging ≥ 15 kg per month or any quantity of acute hazardous wastes, must report:

- 1. Name of the hazardous waste as set forth in 40 CFR Part 261
- 2. EPA hazardous waste number (code)
- 3. Type of discharge to the sewer (continuous, batch, or other)
- 4. . 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



Notification Contents (continued)

<u>IUs discharging > 100 kg of hazardous waste per month,</u> <u>must report:</u>

- 5. The hazardous constituents
- 6. The estimated mass and concentration of such constituents discharged during the calendar month in which the one-time report is made.
- 7. The estimated mass of constituents in the wastestream expected to be discharged during the 12 months following the notification.



Model Notification Form

Model Notification Form			
HAZARDOUS WASTE NOTIFICATION TO POTW			
Company Name			
City		State	Zip Code
Contact Person		Title	
Phone			
Name of Publicly Owned Treatment Works			
NPDES Permit #			
Address			
City		State	Zip Code
HAZARDOUS WASTE INFORMATION (use additional sheets if necessary)			
Name of Waste:			
EPA Hazardous Waste Number:			
TYPE OF DISCHARGE:			
ContinuousBa	tchOthe	r	
IF MORE THAN 100 KILOGRAMS OF ANY HAZARDOUS WASTE PER CALENDAR MONTH IS DISCHARGED TO THE SEWER, PLEASE INCLUDE THE FOLLOWING ITEMS OF INFORMATION FOR EACH HAZARDOUS WASTE, TO THE EXTENT SUCH INFORMATION IS KNOWN AND READILY AVAILABLE.			
Hazardous Constituent Information:			
Name of Constituent	Mass in Wastestream (thi month)	Concentration in Wastestream (this month)	Mass in Wastestream (next 12 months)
I certify that I have a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree I have determined to be economically practical.			
Signature of Company Representative Date			