



CITY OF TROUTDALE

Engineering Division

[Date]

[Recipient]
[Company]
[Street Address]
[City, State ZIP]

Sent via Email and USPS First Class Mail

Subject: RCRA Hazardous Waste Notification Requirements

Dear [Recipient],

The Oregon Department of Environmental Quality (DEQ) and federal regulations (cf., 40 CFR 403.8(f)(2)(iii)), require that the City of Troutdale notify industries who discharge wastewater to the public sewer system of Resource Conservation and Recovery Act (RCRA) hazardous waste reporting requirements. A summary of the notification requirement follows:

Who Must Notify:

All non-domestic users whose wastewater is treated at the City of Troutdale's treatment facilities and that discharge listed or characteristic RCRA hazardous waste to the POTW (except as described below) must notify the City of Troutdale and other regulatory agencies. RCRA listed and characteristic wastes are described in 40 CFR Part 261.

Notification Must be Sent to:

- The City of Troutdale
- The EPA Regional Waste Management Division Director, and
- Oregon DEQ Hazardous Waste Program

This notification must be submitted in writing for any discharge into the City of Troutdale's POTW 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 more than 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.) or less 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 more than 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 twelve months following the notification.

When the Notification Must be Submitted

- No later than 180 days after the discharge of the listed or characteristic hazardous waste.
- In the case of any new regulations under Section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, you must notify the City of Troutdale, 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 Troutdale 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 more than 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.) or less 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.

You can complete and submit the following form to comply with the required notification. To report several wastestreams you can make copies of this form.

HAZARDOUS WASTE INFORMATION (use additional sheets if necessary)

Name, address and contact information for business:

Name of Waste:

EPA Hazardous Waste Number:

TYPE OF DISCHARGE:

_____ Continuous _____ Batch _____ Other _____

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

If more than 100 Kilograms (220 lbs) 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:

Name of Constituent	Mass in Wastestream (this month)	Concentration in Wastestream (this month)

If you have any questions, please call me at [Contact Phone Number] and/or contact:

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

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

Please contact me if you have any questions regarding this matter using my contact information below.

Sincerely,

[Contact Name]
Environmental Specialist