

ATTACHMENT 2

HAZARDOUS WASTE DISCHARGE REPORTING

This notification is intended to provide information to users in the Metro Water Recovery's service area who discharge industrial wastewaters to the sanitary sewer system of their obligations under 40 CFR 403.12. The District's service area includes Arvada, Aurora, Denver, Edgewater, Lakewood, Mountain View, Thornton, Wheat Ridge, and parts of Englewood and Westminster, as well as numerous water and sanitation districts in the metro Denver area.

- a. Within 180 calendar days of commencing any discharge to the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261, the industrial user shall notify in writing Metro, the Regional Waste Management Director of the Environmental Protection Agency, and the Hazardous Materials and Waste Management Division Director of the Colorado Department of Public Health and Environment.

This notification must include the following information:

1. The name of the hazardous waste as set forth in 40 CFR Part 261.
2. The EPA hazardous waste number.
3. The type of discharge (continuous, batch or other).

If the industrial user discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also:

4. Identify the hazardous constituents contained in the wastes.
5. Estimate the mass and concentrations of such constituents in the wastestream discharged during that calendar month.
6. Estimate the mass of constituents in the wastestream expected to be discharged during the following twelve months.

Any notification required by this section needs to be submitted only once for each hazardous waste discharged.

- b. The industrial user is exempt from the requirements of Paragraph a, above, during a calendar month in which it discharges no more than 15 kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e). Discharge of more than 15 kilograms of non-acute hazardous wastes in a calendar month, or of any quantity of acute hazardous wastes, requires one-time notification, as specified above.

Subsequent months in which the industrial user discharges more than such quantities of any hazardous waste do not require additional notification.

- c. In the case of any new regulations under Section 3001 of the Resource Conservation and Recovery Act (RCRA) identifying additional characteristics of hazardous waste or listing any additional substance as hazardous waste, the industrial user must notify the same agencies described above of the discharge of such substance within 90 calendar days of the effective date of the new regulations.
- d. In the case of any notification made pursuant to this section, the industrial user shall certify that it 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.

In addition to these reporting requirements, other requirements of the Colorado Department of Public Health and Environment's Hazardous Waste Regulations may apply to your facility. Attached is the CDPHE's Hazardous Waste Generator Requirements Summary Table to assist you in complying with those regulations. For more information contact:

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Customer Technical Assistance Line: (303) 692-3320; (888) 569-1831 ext. 3320 toll-free

Division website: <http://www.cdphe.state.co.us/hm>
Regulations: <http://www.cdphe.state.co.us/regulations/hazwaste/>

Hazardous Waste Generator Requirements Summary Table

GENERATOR REQUIREMENT	GENERATOR CATEGORY		
	Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Hazardous Waste Determination	Required through process knowledge or analysis (supporting documentation recommended)	Required through process knowledge or analysis (supporting documentation required)	Required through process knowledge or analysis (supporting documentation required)
On-site Disposal	Part "B" Permit required	Part "B" Permit required	Part "B" Permit required
On-site Treatment	Unrestricted (Knowledge of proper & safe treatment methods implied)	Part "B" Permit, Permit-by-Rule, Treat in WWTU or Treat to meet LDR	Part "B" Permit, Permit-by-Rule, Treat in WWTU or Treat to meet LDR
Monthly Generation Rate	< 1 kg of acutely HW < 100 kg of HW (see note below)	< 1 kg of acutely HW > 100 kg but < 1,000 kg of HW (see note below)	> 1 kg of acutely HW > 1,000 kg of HW (see note below)
Maximum Accumulation	< 1 kg of acutely HW < 1,000 kg of HW (see note below)	< 1 kg of acutely HW < 6,000 kg of HW (see note below)	No limit
Accumulation Time Period	None	180 days or 270 days if TSD facility is > 200 miles away (30 day extension available)	90 days (30 day extension available)
EPA ID Number	Required if >3 gallons of F001, F002, F004, F005	Required	Required
Haz. Waste Manifest	Not Required (recommended)	Required	Required
Exception Reports	Not Required (recommended)	Notify CDPHE within 60 days & include a copy of the Manifest	Contact handler within 35 days, Report to CDPHE within 45 days
Biennial Reports	Not Required	Not Required	Required (March 1st of even numbered year)
Contingency Plan	Not Required (recommended)	Limited Elements of Plan Required	Written Plan Required
Container Management	Not Required (recommended)	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Aisle Space, Lids, Weekly Inspections & Acc. Start Date unless at Satellite Accumulation Area	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Aisle Space, Lids, Subparts AA, BB & CC apply, Weekly Inspections & Acc. Start Date unless at Satellite Accumulation Area
Tank Management	Not Required (recommended)	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Acc. Start Date Tracked & Daily Inspections	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Acc. Start Date Tracked, Daily Inspections, Subparts AA, BB & CC apply & Secondary Containment is Required
Personnel Training	Not Required (recommended)	Basic Training Required	Written Training Plan Required
Record Keeping	Disposal Receipts & Waste Analysis Records (recommended)	Manifests, LDR, Training Records & Waste Analysis Records	Manifests, LDR, Training Records, Biennial Reports, Exception Reports & Waste Analysis Records

Note: 1 kg ~ 1 qt, or 2.2 lbs, depending on material*
 100 kg ~ 27 gal (about ½ of a 55 gal drum) or 220 lbs, depending on material*
 1,000 kg ~ 270 gal (about five 55 gal drums) or 2,200 lbs, depending on material*
 6,000 kg ~ 1,620 gal (about thirty 55 gal drums) or 13,200 lbs, depending on material*