

Key Words: Wastewater Treatment, TSDF

Regulations: 40 CFR 261.31, 261.32

Subject: Status of Sludges in Surface Impoundments or Land Treatment Units When Wastewater Treatment Sludges Are Listed in Sections 261.31 and 261.32

Addressee: James H. Scarbrough, Chief Residuals Managment Branch, Region IV

Originator: John Skinner, Director, Office of Solid Waste

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Summary:

Treatment, storage and disposal units are subject to RCRA regluations if: they handled wastewater treatment sludges that are listed in 261.31 and 261.32 or exhibit a characteristic; or if the wastewaters themselves are listed or exhibit a characteristic.

JUL 17 1985

RE: WIBCJ0285

MEMORANDUM

SUBJECT: Status of Sludges in Surface Impoundments or Land Treatment Units when Wastewater Treatment Sludges are Listed in §261.31 & §261.32

FROM: John H. Skinner, Director
Office of Solid Waste

TO: James H. Scarbrough, Chief
Residuals Management Branch, Region IV

In your June 20, 1985 memorandum, you asked if wastewater treatment sludge listings under §261.31 or §261.32 would apply in all situations where land disposal or storage of the associated wastewaters was practiced. You cited a previous memorandum from this office dated November 23, 1984, wherein a determination was made that wastewaters from wood preserving facilities treated in spray irrigation fields generated listed K001 wastewater treatment sludges, and that such units are subject to the hazardous waste facility permitting standards.

Any pollution abatement technique such as the land treatment, disposal, or storage of a wastewater will invariably generate a sludge. The mechanisms for sludge formation involve either precipitation, adsorption, or accumulation of biomass. These units would be subject to regulation if the associated wastewater treatment sludges are listed in §261.31 and §261.32, if the sludges exhibit a characteristic, or if the wastewaters themselves are listed or exhibit a characteristic. These units would therefore be subject to §264, 265, and 266 requirements.

cc: Regional Administrators
Regional Branch Chiefs