

***EPA Centralized Waste Treatment (CWT) Regulations
Became Effective December 2003***

Dear Customer:

We hope this New Year is off to a great start for you. At ESI, we are excited about the many opportunities we have to serve your waste disposal needs. ESI's promise to you is our continued commitment to Safety, Compliance and Customer Service!

This special report is to share important information regarding the recently enacted Centralized Waste Treatment (CWT) Regulations. (A Centralized Waste Treatment facility is a waste water treatment plant that has a permit to accept industrial waste waters from separate offsite companies, treats those wastes, and discharges the ensuing effluent to a POTW or a surface waterway.) Our goal is to explain what they are, how they impact the wastewater treatment industry, and what you should know about waste streams you generate. We will continue to analyze your samples and profiles to insure proper classification. However, we felt you would find this material informative.

Effluent Limitation Guidelines and Pre-treatment Standards for the Centralized Waste Treatment industry are restrictions that apply to wastewater discharges from CWT facilities. These restrictions impose a limit on the concentration of pollutants a CWT may discharge, regardless of its location in the United States or the condition of the receiving water. The discharge standards are not water quality or health-based requirements. Rather, as required by the Clean Water Act, the EPA bases discharge standards on the performance of wastewater treatment technologies applied to CWT waste streams. The discharge standards represent the greatest pollutant reductions economically achievable for the CWT industry.

The EPA developed different effluent limitations and standards for the CWT operations depending on the type of waste received by the CWT. There are three types, or subcategories, of waste (oily, metals, and organics). A discharge standard has been developed for each of the subcategories. The CWT rule establishes quantitative restrictions on a CWT facility's discharge. A CWT facility may use any technology it deems appropriate as long as its discharges are not in excess of those established in the rule.

To assist in the determination of the appropriate subcategory, we have included a copy of the **Waste Receipt Classification Table**. There are specific processes listed under each subcategory. If a waste is not from a specific source, the EPA provides quantitative criteria – which is also provided on the attachment.

As the vast majority of waste received at ESI is shipped under the Used Oil Regulations, ESI has elected to accept wastes from the oily and organic waste subcategories of CWT for treatment at our facility. While ESI will not treat metals subcategory waste as a wastewater, we can offer other treatment options for the water streams classified under this subcategory.

All treatment facilities in the United States were required to meet these new standards as of December 2003. In all cases, treatment, analytical and reporting requirements have increased – be assured ESI meets these standards. If you are contemplating new waste streams such as non-hazardous waters and oily water, it is important to review the CWT Regulations and ask your current or prospective vendors about their CWT compliance status.

Thank you for your business. If you have any questions, please contact your ESI Customer Service or Account Representative at 317-874-0074.

CWT Subcategory Determination

The CWT facility should use common sense to determine which subcategory the waste falls into. To assist the CWT facility, it may use the waste classification table to classify each of its waste receipts into Subcategory A (Metals), B (Oils), or C (Organics).

If the CWT facility receives the wastes listed in the waste classification table, the subcategory determination may be made solely from this information. If the waste is not listed in the waste classification table, then use numerical criteria to determine the proper waste classification.

Waste Receipt Classification Table

Metals Subcategory

- Spent electroplating baths and/or sludges
- Metal finishing rinse water and sludges
- Chromate wastes
- Air pollution control blow down water and sludges
- Spent anodizing solutions
- Incineration wastewaters
- Waste liquid mercury
- Cyanide-containing wastes
- Waste acids and bases with or without metals
- Cleaning, rinsing, and surface preparation solutions from Electroplating or phosphating operations
- Vibratory deburring wastewater
- Alkaline and acid solutions used to clean metal parts or equipment

Oils Subcategory

- Used oils
- Oil-water emulsions or mixtures
- Lubricants
- Coolants
- Contaminated groundwater clean-up from petroleum sources
- Used petroleum products
- Oil spill clean-up
- Bilge water
- Rinse/wash waters from petroleum sources
- Interceptor wastes
- Off-specification fuels
- Underground storage remediation waste
- Tank clean-out from petroleum or oily sources
- Non-contact used glycols
- Aqueous and oil mixtures from parts cleaning operations
- Wastewater from oil bearing paint washes

Organics Subcategory

- Landfill leachate
- Contaminated groundwater clean-up from non-petroleum sources
- Solvent-bearing wastes
- Off-specification organic product
- Still bottoms
- By-product waste glycol
- Wastewater from paint washes
- Wastewater from adhesives and/or epoxies formulation
- Wastewater from organic chemical product operations
- Tank clean-out from organic, non-petroleum sources

This classification is not inclusive of all possible waste streams. It is simply a guidance of the typical waste streams in each subcategory.

Waste Characterization Using Numerical Criteria

For waste streams that are from non-specific sources or not listed in the waste receipt classification table, the facility should use data collected during the waste acceptance procedures to classify the waste into the appropriate subcategory. The EPA recommends the CWT facility apply the following hierarchy:

- 1). If the waste receipt contains oil and grease at or in excess of 100 mg/L, the waste receipt should be classified in the oils subcategory.
- 2). If the waste receipt contains oil and grease <100 mg/L, and has any of the pollutants listed below in concentrations in excess of the values listed below, the waste receipt should be classified in the metals subcategory.

Cadmium	0.2 mg/L
Chromium	8.9 mg/L
Copper	4.9 mg/L
Nickel	37.5 mg/L

- 3). If the waste receipt contains oil and grease < 100 mg/L and does not have concentrations of cadmium, chromium, copper, or nickel above any of the values listed above, the waste receipt should be classified in the organics subcategory.