

9432.1995(01)

Hotline Questions and Answers

February 1995

1. Status of WWTUs/ENUs at Generator Sites

A generator may treat hazardous waste without a permit or interim status in an on-site accumulation unit that is in compliance with the regulations in 262.34 (March 24, 1986; 51 FR 10146, 10168). If a generator chooses to treat hazardous waste in an on-site wastewater treatment unit or in an on-site elementary neutralization unit, must the generator comply with 262.34?

No. A generator treating hazardous waste in an on-site wastewater treatment unit or in an on-site elementary neutralization unit, need not comply with 262.34, which is a conditional exemption from permitting requirements, because these units are already exempt from certain RCRA requirements. Specifically, wastewater treatment units and elementary neutralization units, as defined in 260.10, are exempt from RCRA treatment, storage, and disposal facility (TSDF) standards as well as from permitting standards (264.1(g)(6), 265.1(c)(10), and 270.1(c)(2)(v)).