

9480.1985(02)

JULY 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, absorption, 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 Parts 264, 265 and 270 requirements.

cc: Regional Administrators  
Regional Branch Chiefs

RO 11095