

QUESTION: Does the introduction to a wastewater treatment facility of pumped groundwater contaminated by the slow leakage of an above-ground tank containing a commercial chemical product on the 261.33 list fall under the exclusion category of de minimis losses (261.3(a) (2) (iv) (D))?

ANSWER: No, the fact that the flow has continued long enough to result in groundwater contamination disqualifies it as a de minimis loss.

Source: Steve Silverman

Research: Ken Jennings