



## Managing Sump Waste

Many facilities have devices (e.g., sumps, pits, trenches, traps) to collect debris and dirt before entering a sanitary sewer system. DEQ refers to these devices as “sumps.” The sand, grit, dirt, liquids, and sludge removed from sumps are considered solid waste. Idaho adopts the federal hazardous waste regulations ([40 CFR parts 124, 260-266, 268, 270, 273 and 279](#)) into state rules ([IDAPA 58.01.05](#)). These regulations require owners and operators of facilities that generate solid waste to determine whether wastes are hazardous before disposing of them. Facilities with sumps must determine if the contents are hazardous prior to disposal.

### Determine if your waste is hazardous

There are two primary ways to determine if your sump waste is hazardous: laboratory testing or use of acceptable knowledge.

**Testing:** Laboratory testing is often necessary when activities prevent you from identifying the characteristics and constituents of your waste and if they are hazardous. These activities include engine washing or degreasing, used oil or used antifreeze spills or disposal, and use or spills of hazardous chemicals or pesticides. Inadequate controls on who has access to the sump (e.g., an unattended 24-hour car wash) can also result in unpredictable sump content.

The most common laboratory tests for determining sump waste composition and characteristics are the following:

- Flash point test to determine ignitability. A flash point under 140°F is hazardous.
- pH test for corrosivity. pH less than or equal to 2 or greater than or equal to 12.5 is hazardous.
- Toxicity Characteristic Leaching Procedure (TCLP) for constituents like heavy metals or benzene. While a Totals Metals test can be performed first, you may still need to do a TCLP if the levels come back above TCLP thresholds.
- Pesticide screen.

**Note: Talk to your pumper or disposal facility to help determine which tests are most appropriate for your waste.**

**How often do you need to test?** Facilities with controlled access and processes that do not change may only need to test their sump waste once. Retesting is required when a process that drains to the sump changes. Facilities that do not restrict access (e.g., an unattended 24-hour public car wash) need to test the sump waste each time it is removed for disposal.

**Acceptable knowledge:** Regulations also allow the hazardous waste determination to be made through use of *acceptable knowledge* in addition to or in lieu of laboratory testing. Acceptable knowledge must be accurate and can include knowledge of the processes that created the waste, the chemical constituents of the waste, and whether or not listed hazardous wastes have entered

the sump. It does not include information that does not pertain directly to your sump's waste at the time of disposal (e.g., testing from another facility's sump).

Acceptable knowledge is commonly used to narrow the number of tests required for hazardous waste determinations. Facilities that limit the type of use and access to the sump may also be able to use acceptable knowledge to show that no hazardous constituents are used in the processes that discharge or drain into the sump.

## Where can you dispose of your sump waste?

**Small Quantity Generators (SQGs) and Large Quantity Generators (LQGs):** If the analyses show the sump waste is **hazardous**, it must be disposed of at a permitted hazardous waste treatment, storage, and disposal (TSD) facility in accordance with hazardous waste regulations. All analytical results must be kept on file at the facility for at least three years, preferably indefinitely.

If the analyses show the sump waste is **nonhazardous**, it may be disposed of at a municipal solid waste landfill (MSWLF) or a nonhazardous solid waste impoundment (NSWI). Owners and operators disposing of sump waste should check with their disposal facility before having their waste analyzed to ensure all appropriate tests are conducted.

**Very Small Quantity Generators** Very small quantity generators (VSQGs) generate less than 220lbs (100 kg) of hazardous waste per calendar month. Regulations allow VSQGs to send their hazardous waste to a MSWLF and have the same options as SQGs and LQGs for disposal of nonhazardous sump waste. VSQGs should check with their disposal facility to ensure that it will accept the waste and ensure all facility requirements are met.

## Tips to managing sump waste

Plan ahead and document all activities associated with your sump to save time and money on testing and waste disposal.

- Control access to the sump. If you know what enters the sump, it is more likely that you can use *acceptable knowledge* as part of your hazardous waste determination.
- Train your employees to be aware of potentially hazardous chemicals onsite so they do not put these down drains leading to the sump.
- Document spills and cleanups so you can demonstrate if your sump was impacted or not.
- Make arrangements with pumpers and disposal facilities ahead of time. Some facilities may require testing beyond what is required by DEQ.
- Discuss the logistics of sampling and testing with your pumper. You may need to store sump waste onsite while awaiting test results.

## For more information

For specific questions, contact your nearest DEQ regional office:

- Boise: (208) 373-0550
- Coeur d'Alene: (208) 769-1422
- Idaho Falls: (208) 528-2650
- Lewiston: (208) 799-4370
- Pocatello: (208) 236-6160
- Twin Falls: (208) 736-2190

For general information, see [www.deq.idaho.gov](http://www.deq.idaho.gov) or call the state's Hazardous Waste bureau at (208) 373-0502.