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March 17, 2015

Important Notice:

Hazardous Waste Neutralization at Printing Facilities

The Sacramento County Environmental Management Department (EMD) is the local Certified Unified Program Agency (CUPA) and is responsible for enforcement of the hazardous material and hazardous waste programs within Sacramento County. EMD has become aware of a hazardous waste neutralization process at various printing facilities within Sacramento County. This notice is being provided to the various printing facilities throughout Sacramento County in order to clarify the hazardous waste requirements.

Recently EMD has observed that some printing facilities/shops are generating a corrosive wastewater from a plate developer process. In some cases, this wastewater is being treated (neutralized) on-site prior to being discharged to the sanitary sewer. Waste generators are responsible for determining if each waste generated on-site is a hazardous waste (California Code of Regulations (CCR), Title 22, Section 66262.11). There are several characteristics that can cause a waste to be a hazardous waste, including corrosive aqueous waste streams with a pH ≤ 2 or ≥ 12.5 . However, this waste determination must be performed at the point of waste generation, before any waste treatment activity has occurred. The term "treatment" includes any pH adjustment or neutralization activities. If a printing facility determines that the waste generated is a hazardous waste, the facility is not allowed to treat that wastestream without authorization from the CUPA (California Health and Safety Code 25201(a)).

Below are some possible options for the proper management of any wastewater from this process that is determined to be a hazardous waste:

1. Consult the California Department of Toxic Substance Control (DTSC) Tiered Permitting Flowchart (<http://www.dtsc.ca.gov/HazardousWaste/upload/onsite-tiered-permitting-flowchart3.pdf>) and determine if the hazardous waste in question is eligible for treatment authorization. If the hazardous waste stream is eligible for treatment, submit the proper Tiered Permitting Notification documentation to the local CUPA for approval and obtain also obtain a treatment permit from the CUPA.
2. Accumulate the hazardous waste(s) generated from the printing process in suitable containers or tanks on-site and then dispose of through a licensed hazardous waste hauler.

NOTE: Discharging hazardous waste to the sanitary sewer system is a violation and could subject the facility owner/operator to potential fines/penalties.

If you have any questions regarding hazardous waste determinations and/or hazardous waste treatment requirements, please contact EMD Specialists Ryan Artz at ArtzR@saccounty.gov or Daniel Abellon at AbellonD@saccounty.gov.

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