

COUNTY OF SACRAMENTO
Environmental Management
Department (EMD)

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EMD is the Certified Unified Program Agency (CUPA) for Sacramento County including its incorporated cities. The Sacramento County CUPA Program is administered by the EMD Environmental Compliance Division.

DISCLAIMER - The information contained in this Compliance Assistance Bulletin is based upon the statutes and regulations and is intended to provide a basic overview to help achieve compliance. This document does not replace or supersede relevant statutes and regulations and is not intended as legal advice. All interested parties should monitor changes to relevant statutes and regulations for updates.

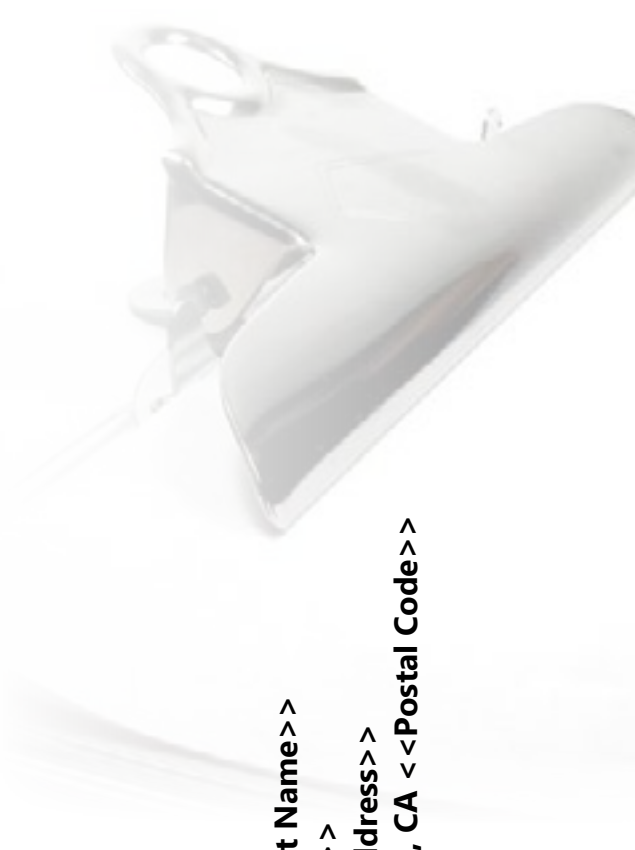
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**COMPLIANCE
ASSISTANCE
BULLETIN**

June 2015



COMMON WASTES AT DAIRIES



**ENVIRONMENTAL MANAGEMENT
DEPARTMENT (EMD)**

916-875-8550 • emd.saccounty.net

Dairy Cleaning and Disinfecting Processes

EMD has become aware of a number of potentially hazardous wastes generated during cleaning and disinfecting processes used at dairies.

This notice is being provided to assist dairies located in Sacramento County to properly identify, manage, and dispose of hazardous waste.

Clean In Place (CIP) Process

- ▶ The clean in place process (CIP) of cleaning milk tanks and associated piping uses chemicals that are either acidic (low pH) or caustic (high pH).
- ▶ These chemicals are generally applied during a specific part of the cleaning cycle and are rinsed with water once that part of the cycle is complete. EMD has observed that in some cases the wastewater is then discharged into a drain that typically leads to the dairy manure clarifying pond.
- ▶ If this wastewater is hazardous, (see *Hazardous Waste Determination Section*) it must be managed and disposed of as hazardous waste and cannot be discharged to the dairy manure pond.

Foot Baths

- ▶ Foot bath solutions, containing chemicals used to control disease outbreaks, is another waste that may be a hazardous waste.
- ▶ The corrosivity and/or the toxicity of the chemicals, once in solution, may exhibit levels of low pH and/or toxicity that would cause the foot bath solution to be a hazardous waste at the point the solution is no longer useable.
- ▶ There are alternative chemicals that can be used in foot baths to reduce the likelihood of the spent foot bath solution being a hazardous waste.

Other Wastes

- ▶ Used/waste oil from vehicles or equipment must be managed and disposed of as hazardous waste. It cannot be reused for any other application.
- ▶ To locate used oil recycling locations, visit our website at www.emd.saccounty.net/pages/oils-and-filters.aspx.
- ▶ EMD may be unaware of other wastes at your dairy that may be hazardous.
- ▶ It is the waste generator's responsibility to identify hazardous waste and to manage and dispose of it properly.

Methane Digesters

If there is a methane digester on your site, there may be hazardous materials being stored in reportable quantities and/or hazardous wastes being generated from the routine maintenance of the digester engine such as motor oil, coolant, used oil, used oil filters, and used coolant.

If there are hazardous materials in reportable quantities (55 gal or greater of a liquid, 500 lbs. or more of a solid, or 200 cu. ft. or more of a compressed gas) or hazardous wastes are being generated by the methane digester, then a permit by EMD is required for your facility.

A visit by EMD to check for hazardous materials and hazardous wastes in reportable quantities is the best way to determine if the methane digester is to be regulated by EMD.

Please contact Eric Sutton at (916) 875-8491 to schedule a survey of the digester or if you have any questions.

Hazardous Waste Determination

It is the responsibility of the waste generator to determine if any wastes (including those above) are a hazardous waste at the point of generation prior to discharge and/or disposal.

Clean In Place Process

- ☑ One method to determine if wastewater is hazardous waste due to pH would be to collect samples of the wastewater at the end of each individual cleaning cycle, as it is being released during normal operation. The wastewater should then be tested for pH.
- ☑ If the pH of the wastewater is less than or equal to 2 or greater than or equal to 12.5, then it is a hazardous waste and must be properly collected and disposed of by a California licensed waste hauler. It may not be neutralized before disposal.

Foot Baths

- ☑ In addition to pH, this waste may be hazardous due to toxicity.
- ☑ Determining toxicity involves taking a sample of the foot bath solution, once the solution is spent, and submitting it to a State Certified lab for testing.
- ☑ For more information, please call Eric Sutton at (916) 875-8491.