

SANITARY SEWER CLEANOUT WASTE

There are requirements for properly handling wastewater residuals from sanitary sewer cleanout projects. The residuals may include solids, sludges, biosolids, filter backwash, and other potential pollutants generated during the collection and treatment of the wastewater.

Sanitary sewer and storm sewer clean-out residue (sewer residue) removed from sewer systems, including waste removed from combined sanitary sewer and storm sewer systems, is regulated as liquid industrial waste (LIW) when it contains free liquids and has not been contaminated by spills or releases that would make it a regulated hazardous waste. A paint filter test is the method used to determine if a solid/liquid mixture contains free liquids. See the guidance [Waste Characterization](#) for additional information about determining how a waste is regulated. For specific information about handling storm sewer cleanout residue, see the *Catch Basin Cleaning Activities Guidance Document* that will soon be posted on the publication website at www.deq.state.mi.us/pubcenter. If the waste is determined to be a hazardous waste, then the requirements would depend on the amount of hazardous waste that is generated in a calendar month. See related hazardous waste guidance referenced in the Waste Characterization document or discuss requirements with the Department of Environmental Quality (DEQ) Waste and Hazardous Materials Division (WHMD) [district office](#).

Several divisions within the DEQ may have involvement with sewer maintenance projects. The WHMD oversees the requirements for managing sewer residue pursuant to [Part 121, Liquid Industrial Waste](#), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the [Hazardous Materials Transportation Act](#) (Act 138 of 1998). Disposal of solids is regulated under [Part 115, Solid Waste Management](#), of Act 451 and administrative rules. There are specific requirements summarized below for LIW generators, the contractor or municipality transporting and disposing of the waste, and the designated facility accepting the waste.

The Water Bureau oversees the regulations for construction and operations of sewer systems.

The Environmental Science and Services Division oversee S2 Grant and State Revolving Fund (SRF) projects that often include sewer cleaning and televising. Municipalities, their consultants, and contractors must meet all applicable federal, state, and local laws, rules, and regulations. DEQ's administration of an S2 Grant and an SRF Loan could be complicated if it is determined that a grant or loan applicant is in violation of the LIW regulations. DEQ actions may include the withholding of S2 or SRF funds until the matter can be resolved. A worst-case scenario might result in the termination of the grant or loan agreement.

GENERATOR REQUIREMENTS

In the case of sewer cleaning projects, the generator of the sewer clean-out waste is the entity responsible for the sewer system.

The generator requirements are summarized in the *Liquid Industrial Waste Generator Requirements* guidance that will soon be posted on the DEQ publication center website at www.deq.state.mi.us/pubcenter. These requirements include notifying the WHMD about the generator's waste activities, obtaining a site identification number, and managing and disposing of the waste properly. Proper waste handling includes hiring permitted and registered transporters (if a municipally owned and operated vehicle is not being used), and using uniform waste manifests or meeting alternative shipping record requirements.



TRANSPORTER REQUIREMENTS

Commercial transporters must be permitted and registered under the *Michigan LIW Uniform Program* and obtain a site identification number. This program also includes requirements for managing the waste, manifesting and other recordkeeping, and insurance coverage. Municipalities operating their own trucks are not required to be permitted and registered under Act 138; however, they still are still subject to the insurance coverage requirements of Act 138 and the manifesting, recordkeeping, and disposal requirements of Part 121 of Act 451.

A LIW transporter must carry a copy of his/her credentials and manifest with each load of LIW. The LIW transporter must complete the transporter section of the uniform hazardous waste manifest (EPA form 8700-22) which is also used for LIW shipments. The transporter must deliver the LIW and accompanying hazardous waste manifest only to a designated facility specified by the generator on the hazardous waste manifest.

Transporter applications, regulations, and other resources are available at www.michigan.gov/deqwaste "Hazardous and Liquid Industrial Waste Transporters." Look under the Information heading for "Uniform Manifest Information."

DESIGNATED FACILITY REQUIREMENTS

The site accepting the waste must notify the WHMD that they are operating a designated facility, obtain a site identification number, sign and maintain manifest copies, and meet operating requirements identified in Part 121 of Act 451. Drying beds may be used to remove the liquid portion from the residue and the remaining solid waste can be sent to a landfill with the landfill authority's approval, or the site owner may obtain permission from DEQ WHMD for alternative uses. Before operating a drying bed, discuss the operations with the DEQ [district office](#) to determine if any additional regulations may apply.

RESOURCES

Direct questions about the management of sewer residues removed from the wastewater treatment system to the appropriate WHMD [district office](#) or call the Environmental Assistance Center at 800-662-9278 for referral.

This document was developed in November 2007 by the Environmental Science and Services and Waste and Hazardous Materials Divisions. Reliance on information from this document is not usable as a defense in any enforcement action or litigation. Refer to the regulations or discuss your requirements with the regulating agency staff.

The Michigan Department of Environmental Quality (MDEQ) will not discriminate against any individual or group on the basis of race, sex, religion, age, national origin, color, marital status, disability, or political beliefs. Questions or concerns should be directed to the MDEQ Office of Human Resources, PO Box 30473, Lansing, MI 48909.