centralized waste treatment operations. Under the approach EPA is proposing, in the case of the introduction of stormwater after treatment but before discharge, the allowable discharges from such a facility would be based on the guideline limitations and standards before the introduction of the stormwater. In the case of the stormwater or other wastes introduced before treatment, as discussed previously, the EPA used several methods to estimate current industry performance. EPA solicits comment on the methodologies used to estimate current discharge performance. EPA also requests discharge monitoring data from facilities prior to commingling the Centralized Waste Treatment wastewater with other sources of wastewater. These data will be used to assess current discharge performance and to statistically analyze the autocorrelation of concentrations measured on consecutive days (See Section V.G. for an explanation of autocorrelation). Before submitting discharge monitoring data, please contact Debra DiCianna at (202) 260-7141 to ensure that the data provided include information to support its use for calculating current performance and possible limitations.

## 8. Implementation of Regulation for Multiple Subcategory Facilities

Forty percent of the facilities in the Centralized Waste Treatment Industry receive flows that fall within two or more of the proposed subcategories for this industry. Since waste receipts in this industry are concentrated and difficult to treat, the Agency believes that the defined levels of effluent reductions will not be met if waste receipts from different categories are treated in a single treatment system. EPA has concluded that separate pretreatment steps are necessary in order to treat the waste receipts adequately for its constituents prior to commingling the wastes. For example, if oily wastes and metal-bearing wastes are mixed, selective metals precipitation will not remove certain constituents (i.e. n-decane, oil and grease) which would be removed if the oily waste is pretreated before precipitation. As discussed above, the approach which EPA has proposed would require monitoring to demonstrate compliance after oily waste treatment and after metal-bearing treatment. The EPA solicits comment on other approaches for implementing the proposal in order to address the problem of discharges from treatment of mixed subcategory wastes. EPA also requests data on the performance of treatment systems which are designed to treat waste that may be characterized in more than one subcategory.

9. Applicability of Guideline to POTWs Treating CWT Wastes

EPA is soliciting comment today also on how to treat wastes received for treatment at a POTW by tanker truck, trailer/roll-off bins or barges or other forms of shipment. EPA is aware that there are several POTWs receiving wastes for treatment that are not discharged to the POTW through sewers or pipes. EPA welcomes additional information and data on the subject.

The CWA provides that pretreatment standards apply to all discharges which pass through or interfere with POTW operations and all POTWs must comply with effluent limitations based on secondary treatment requirements and any more stringent limitations, including those necessary to meet water quality standards, treatment standards, or schedules of compliance established pursuant to any other Federal law or regulation. CWA Sections 301(a)(1) and 307(b). Under RCRA, under certain conditions, a POTW may accept hazardous waste for treatment. A POTW is deemed to have a permit for treatment of hazardous waste if, among other things, the POTW complies with the conditions of its NPDES permit and certain RCRA regulatory requirements (e.g., use of the RCRA manifest system, maintaining certain records). In addition, the waste must meet "all Federal State, and local pretreatment requirements which would be applicable to the waste if it were being discharged into the POTW through a sewer, pipe or similar conveyance." 40 CFR 270.61(c)(4). Under this provision, therefore, EPA has concluded that a POTW cannot accept wastes for treatment via any form of shipment which are RCRA hazardous wastes unless these wastes comply with pretreatment requirements in today's guideline. Moreover, it is EPA's view that whether the CWT wastes are hazardous or non-hazardous, the pretreatment standard would apply to the CWT wastes. As proposed today, the pretreatment standards apply to the introduction of a pollutant to a POTW irrespective of the mechanism for introducing that pollutant to the POTW.

EPA is soliciting comment on how widespread is the practice of POTW treatment of wastes received from offsite via any form of shipment as well as its tentative conclusion that today's proposal would apply to such wastes. 10. Treatment of Incidental Organic Pollutants Detected in the Metals Subcategory

During the EPA sampling program, EPA collected analytical data on the presence of organic pollutants in the Metals Subcategory. Various organic pollutants were detected at low concentrations in the untreated CWT wastewater. EPA sampled treatment technologies to control the discharge of organic pollutants. In most circumstances, the organic pollutants detected at low concentrations in the treatment facility influent were found at non-detectable levels prior to any treatment for the organic pollutants. Because the initial concentrations of organic pollutants were very low, the addition of treatment chemicals and other sources of CWT wastewater caused the concentrations to become lower and thereby non-detectable. As previously discussed, EPA sampled carbon adsorption units to use as addon technologies for the removal of organic compounds, but treatment performance for carbon adsorption units was found to be uniformly poor throughout the industry. EPA solicits comment on the necessity of control on low level organic pollutants for the Metals subcategory and technologies appropriate for the control of low level organics as well as analytical data to characterize the performance of such treatment technologies.

11. Additional Technologies for the Control of Concentrated Cyanide-Bearing Wastes

The BPT effluent limitations and standards for the pretreatment control of cyanide in the Metals Subcategory is based on the use of alkaline chlorination at specific operating conditions which enable the destruction of concentrated cyanide complexes. Two additional treatment technologies were sampled in the process of developing the proposed regulation. Performance by one treatment technology was uniformly inadequate for the treatment of concentrated cyanide waste. The additional treatment technology sampled performed well in the treatment of concentrated cyanide complexes, but is propriatary information. EPA solicits information on additional treatment technologies applicable to the treatment of concentrated cyanide complexes that are commercially available.

12. Probability and Cost of RCRA-Permitted Facilities Undergoing Closure

The Agency has predicted that a few companies may undergo bankruptcy as