



Mud Trap Waste – Disposal and Beneficial Use Options

Technical Guidance Document SW-1994-G3

This document describes the options and requirements for disposal and beneficial use of mud trap waste.

Background

The purpose of a mud trap is to settle out mud, sand, and grit from wash down water so these materials do not enter the sewer system and potentially plug the sewers. Many commercial car wash, truck wash, industrial, and repair facilities have a mud trap at the point where wash down water drains into the sewer system. Mud traps must be cleaned out periodically. The characteristics of the mud trap waste depend on the type of wash facility generating the wash down water.

Commercial Car Wash Facilities

Per Bureau of Waste Management Policy 2016-P2, Classification of Commercial Car Wash Mud Trap Waste, mud trap waste from commercial car wash facilities, including fleet car wash facilities, is considered non-hazardous and is not subject to Bureau of Waste Management (BWM) requirements for disposal or beneficial use.

Truck Wash Facilities, Industrial Facilities, or Repair Facilities

Mud trap waste from truck wash facilities, industrial facilities, and repair shops may be hazardous waste, as defined in 40 CFR 261.3, due to high concentrations of petroleum products and/or heavy metals. All truck wash facilities, industrial facilities, and repair facilities must test their mud trap waste to determine disposal or beneficial use options for this waste. The analytical testing only needs to be conducted once, as long as the process generating the mud trap waste does not change. If there is any change in the process (e.g., product or procedure change), then analytical testing must be conducted again on the mud trap waste generated after the process change.

The waste must be tested for volatile organic compounds (VOCs) and RCRA metals using the Toxicity Characteristic Leaching Procedure (TCLP), EPA test method SW-846/1311. The waste must be analyzed at a Kansas Department of Health and Environment (KDHE) certified laboratory. A list of KDHE-certified laboratories can be found at: <http://www.kdheks.gov/envlab/disclaimer.html>

DISPOSAL AND BENEFICIAL USE OPTIONS

If the mud trap waste is a hazardous waste, the facility is a RCRA hazardous waste generator and must manage and dispose of the mud trap waste in accordance with the requirements of the facility's hazardous waste generator category (refer to K.S.A. 65-3430 *et seq.* and K.A.R. 28-31-4 *et seq.*).

If the waste is determined to be non-hazardous per the TCLP analytical results, disposal and beneficial use options are the following:

DRY Mud Trap Waste (passes the paint filter test, EPA test method 9095B in SW-846)

1. Dispose of in a municipal solid waste landfill (MSWLF) (must have a special waste disposal authorization from BWM – see instructions at the end of this document)
2. Apply on top of a closed cell at an active or closed MSWLF (must have approval from the BWM landfill permit manager)
3. Use beneficially (must have written approval from BWM – see instructions at the end of this document)

WET Mud Trap Waste

1. De-water and dispose of as DRY Mud Trap Waste
2. Transfer to a commercial processing facility
3. Transfer to a wastewater treatment plant
4. Dispose of in an MSWLF that is permitted to take liquid wastes under the Research, Development, and Demonstration (RD&D) Rule (must have a special waste disposal authorization from BWM – see instructions at the end of this document)
5. Apply on top of a closed cell at an active or closed MSWLF (must have approval from the BWM landfill permit manager)
6. Use beneficially (must have written approval from BWM – see instructions at the end of this document)

REQUESTING A SPECIAL WASTE DISPOSAL AUTHORIZATION

The Special Waste Disposal Request form with instructions may be downloaded from the KDHE BWM website www.kdheks.gov/waste/.

The completed form may be submitted by:

- Scanning and emailing to kdhe.swda@ks.gov;
- Faxing to 785-559-4254; or
- Mailing to the address on the top of this document. At the beginning of the address block, please add “ATTN Disposal Authorization.”

REQUESTING APPROVAL FOR THE BENEFICIAL USE OF MUD TRAP WASTE

The application form for the beneficial use of mud trap waste may be downloaded from the KDHE BWM website www.kdheks.gov/waste/.

The completed form may be submitted by:

- Scanning and emailing to kdhe.bwmweb@ks.gov;
- Faxing to 785-559-4253; or
- Mailing to the address on the top of this document. At the beginning of the address block, please add “ATTN Beneficial Use Application.”

For additional information regarding the proper management of solid or hazardous waste in Kansas, you may visit the Bureau of Waste Management website at www.kdheks.gov/waste/ or contact the Bureau at: 785-296-1600, kdhe.bwmweb@ks.gov, or the address at the top of this document.