

QUESTION: Does the exemption for mixtures of hazardous waste and domestic sewage extend to privately owned sewers and wastewater treatment units which eventually discharge to a publicly-owned treatment works?

RESOLUTION: Although RCRA does not define "sewer system", it is not the Agency's intent to include private sewers or wastewater treatment units up-stream from the point where pre-treatment standards (Section 307(b) of CWA) would apply to wastes going by a sewer to a publicly-owned treatment works.

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