



February 19, 2014

Important Notice: Water Well Rehabilitations

The Sacramento County Environmental Management Department (EMD) is the Certified Unified Program Agency (CUPA) and is responsible for enforcement of the hazardous materials and waste programs within Sacramento County. EMD has become aware of the well rehabilitation process that many water purveyors employ at various well sites within Sacramento County. This notice is being provided to the water purveyors throughout Sacramento County in order to clarify the hazardous waste requirements.

Each rehabilitation may vary depending on the well and the contractor conducting the rehabilitation. The rehabilitations involve placement of various solutions in the well at designated stages in the process. For instance, many rehabilitation processes place an acidic solution in the well until it no longer functions for its intended purpose. The acidic solution is then removed from the well and is typically accumulated and eventually neutralized (treated) in a tank before disposal to the sewer. It is EMD's determination that these spent solutions meet the definition of a waste when removed from the well. Once determined to be a waste the next step is to make a hazardous waste determination.

From our discussions with the California Department of Toxic Substances Control (DTSC), we are not aware of any exclusions for these types of wastes in Title 22 of the California Code of Regulations (CCR) or the California Health and Safety Code (CHSC). The wastes are not listed waste, but may at times exhibit the characteristics of a hazardous waste, the most likely being the characteristic of corrosivity (aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5). If the wastes are determined to be hazardous some possible options include the following:

- Dispose of the waste as hazardous waste using a licensed waste hauler.
- Obtain a permit from DTSC to treat the waste onsite in a Transportable Treatment Unit (TTU).
- Recycle the hazardous waste pursuant to CHSC Section 25143.2.

A contact for obtaining a permit from DTSC to treat the waste onsite in a TTU is currently Clyde West. His contact number is 916-445-2959. Applicable forms and guidance are available upon your request.

When applying for a well repair/pump repair permit please identify the work to be performed is for a well rehabilitation. The permit will then be conditioned with a requirement to comply with all California Hazardous Waste Control Laws. If you have any questions, please contact Chris Hunley at (916) 876-7277.