

## KAM-rule 35

### Requirements for discharge of hazardous substances and mixtures to sewers

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3.1	January 4, 2021	Appendix 35.3 Klercide, MEIKOLON ÖkoClean KS, MEIKOLON ÖkoCleanFR, Rogypal AC-309 en Special kennel cleaner added	St. AL-terrein	Management
3	August 13, 2020	Adjustment cleaning products used by cleaning companys and company canteen appendix 35.3	St. AL-terrein	Management
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1.1	October 11, 2016	Appendix 35.3: Cosa CIP 92 added	St. AL-terrein	Management
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## Introduction

According to the Environmental Licensing (General Provisions) Act (NL: Wet algemene bepalingen omgevingsrecht, Wabo), waste from laboratories and production sites is considered hazardous waste. This hazardous waste has to be collected and is not be discharged to sewers. Other KAM-rules that are relevant to this KAM-rule (35) are displayed in Table 1:

**Table 1: Other KAM-rules relevant to KAM-rule 35**

No. KAM-regulation and title	Relevance
<a href="#">03 Working safely with hazardous substances</a>	When working with hazardous substances, concerning safety rules
<a href="#">07 Disposal of (hazardous) waste</a>	When the hazardous substance has to be disposed of as hazardous waste in e.g. waste drums

On the USPB, three types of waste water streams are discriminated:

- 1) **Sanitary/household waste water** (this may be discharged).
- 2) **Waste water from laboratories** (may not be discharged, unless it falls under the exceptions as indicated in KAM-rule 03).
- 3) **Waste water that may only be discharged under certain conditions.** This concerns waste water from biological production or waste water from a flow cytometer, when inactivated (e.g. in a autoclave or kill tank), as well as cleaning agents, disinfection agents and boiler water treatment agents as mentioned in appendix 35.2 or those positively evaluated according to the diagram in appendix 35.2.

For the third category of waste water, this KAM-rule offers the application framework. Insight into the aquatic hazard of the substance or mixture is necessary before discharge of the substance or mixture can take place. Based on these insights a so-called decontamination effort can be determined for these substances or mixtures. This is done by using the 'general assessment methodology 2016' (NL: Algemene BeoordelingsMethodiek 2016 [ABM])<sup>1</sup>. To determine the aquatic hazard of substances or mixtures, information is required on the properties of the substances and the composition of the mixtures.

The following requirements in the environmental permit (VOH) of the site determine the admissibility of substances and mixtures for discharge:

- Requirements for discharge regarding various substances (see also appendix 35.1). This concerns aqueous waste streams from samples of e.g. ground and/or drinking water that have been acidified. It is allowed to discharge these acidified samples to sewers, provided that they do not contain SVHCs or other aquatic hazardous substances (see KAM-rule 19 Empty chemically contaminated packaging) and provided that, apart from the acid, no other hazardous substances are contained by / added to the samples.
- Substances that are being discharged in significant quantities (e.g. cleaning agents, disinfection agents and boiler water treatment agents) have to be subjected to an ABM-assessment. Cleaning and disinfection agents for example, are being used in washing machines in the laboratory (for the cleaning of glassware) as well as being used for cleaning laboratories, production rooms and other types of rooms.

In principle, no hazardous substances may be discharged, except for cleaning agents, disinfection agents and boiler water treatment agents that sufficiently degrade in or are removed by the municipal waste water treatment plant.

The criteria for classification and the appropriate decontamination efforts are given in the ABM. The decontamination effort (measures at the source by substitution, reuse and process modification, followed by further minimisation by purification of the waste water stream) has to be executed before a discharge

<sup>1</sup> 'Algemene Beoordelingsmethodiek (ABM) 2016, Methode ter bepaling van de benodigde saneringsinspanning bij lozingen op basis van stoffeigenschaften', Ministerie van Infrastructuur en Milieu, 16 March 2016.

of cleaning agent, disinfection agent or boiler water treatment agent takes place. The application of the criteria is explained in the chapter 'Method'.

In the environmental permit and in the Activity Decree (NL: Activiteitenbesluit) the criteria for the site regarding laboratories, production locations and several hazardous substances are laid down. This KAM-rule explains the given restrictions (see appendix 35.1) and the measures to comply with the requirements for discharge.

### Objective

The objective of this KAM-rule is that the method for the assessment of environmentally hazardous substances regarding the collection of waste and potential discharge hereof to sewers is known and followed.

### Responsibilities

The following applies to this KAM-rule:

- The line manager is responsible for the implementation of and compliance with this KAM-rule within his own organisational unit.
- The employee is demonstrably familiar with this KAM-rule and follows the method as described.

### Method

The ABM-assessment discriminates in the categories Z, A, B or C, which results in the decontamination effort for the substance to be discharged.

Z	Substances of Very High Concern (SVHC): set of substances that are most hazardous to humans and the environment;
A	Not readily biodegradable aquatic harmful substances;
B	Readily biodegradable aquatic harmful substances;
C	Substances that occur naturally in local surface water.

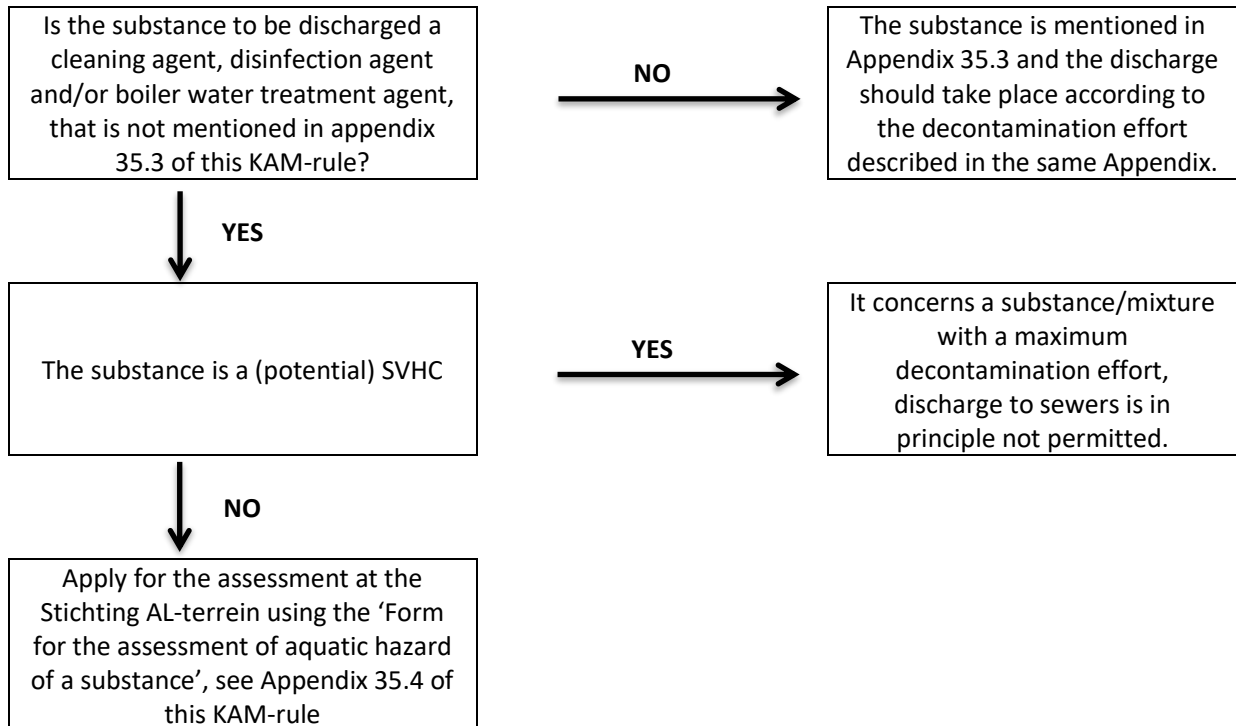
This classification is based on the physical, chemical and toxicological properties (in the ABM 2016, the biodegradability is the starting point of the assessment). The requirements for determining the category of a substance are given in appendix 35.2, as well as the required information and the flowchart for classification.

Before cleaning agents, disinfection agents and boiler water treatment agents are allowed to be discharged to the sewer, an ABM-assessment has to be carried out by a waste water expert. Before discharge can take place the following steps have to be taken, in case the substance involved is not classified according to appendix 35.3:

- 1) The user fills out the complete form as displayed in 35.4 ('Form for the assessment of the aquatic hazard of the substance'). The form has to be sent to the Stichting AL-terrein ([secretaris@stichting-alt.nl](mailto:secretaris@stichting-alt.nl)) including the Material Safety Data Sheet (MSDS);
- 2) The Stichting AL-terrein evaluates if the form contains sufficient information. The user is informed if an ABM-assessment can be executed with the information provided for or if further information is needed.
- 3) If sufficient information has been received, the Stichting AL-terrein will send the information to a waste water expert who will evaluate the aquatic hazard of the substance using an ABM assessment;
- 4) The assessment and results of the ABM-assessment are communicated to the user. The substance is classified into one of the categories Z, A, B or C.

Depending on the result of the ABM-assessment the user takes measures and/or provisions corresponding with the category, as determined in appendix 35.2

### Flow chart assessment aquatic hazard



## Terms and abbreviations

Subject	Elaboration	Explanation
<b>ABM</b>	General assessment methodology i.e. an assessment for determining in which category (Z, A, B or C) a certain hazardous substance falls and which decontamination effort is required.	Method to evaluate substances and mixtures based on the aquatic hazard of the (mixtures of) substances.
<b>Z-category</b>	Substances of Very High Concern (SVHC): A set of substances that are most hazardous to humans and the environment (e.g. polycyclic aromatic hydrocarbons, dioxins, mercury and its compounds).	Use of these substances has to be terminated. <a href="https://rvs.rivm.nl/stoffenlijsten/Zeer-Zorgwekkende-Stoffen">https://rvs.rivm.nl/stoffenlijsten/Zeer-Zorgwekkende-Stoffen</a> (Click on the diverse documents and links on this website for additional information. In Dutch)
<b>A-category</b>	Not readily biodegradable aquatic harmful substances.	Use of these substances has to be terminated.
<b>B-category</b>	Readily biodegradable aquatic harmful substances.	Discharge of these substances has to be prevented as much as possible.
<b>C-category</b>	Substances that occur naturally in local surface water.	For these substances the need for taking emission reducing measures has yet to be determined.
<b>KAM-rules</b>	Kwaliteit, Arbo- & Milieuregels (rule for Quality, Occupational Health and Safety and Environmental protection.).	
<b>Line manager</b>	The responsible supervisor.	
<b>Site</b>	Site at the Antonie van Leeuwenhoeklaan USPB.	USPB: Utrecht Science Park Bilthoven.
<b>VOH</b>	Vergunning op Hoofdzaken (Permit on essentials), that is the environmental permit with conditions the entire AL-site must meet.	Environmental Permit that includes the discharge rules and the ABM-test.
<b>Wabo</b>	Wet algemene bepalingen omgevingsrecht (Environmental Licensing (General Provisions) Act ).	Legislation concerning the environmental permit. This permit is a single integrated permit for nature and environment, building, discharge to sewers, etc.

## Appendices

- Appendix 35.1:** Requirements for discharge to sewers
- Appendix 35.2:** ABM-assessment: evaluation of substances (Z, A, B or C)
- Appendix 35.3:** List with cleaning agents, disinfection agents and boiler water treatment agents, buffer fluids and other substances that have already been assessed
- Appendix 35.4:** Form for the assessment of the aquatic hazard of the substance or mixture

## Appendix 35.1: Requirements for discharge to sewers

The organisations on the site use a common sewer. Discharged waste water ultimately leaves the AL-site via three sample pits. These sample pits are located at the site borders. The environmental permit contains strict discharge requirements for these three sample pits, with regard to heavy metals<sup>2</sup>, BTEX<sup>3</sup> and VHCs<sup>4</sup>, see tables A and B below.

Table A. Maximum content in any sample

Measuring point	Parameter	Maximum (in µg/l)
M01, M02 & M03 <sup>5</sup>	Heavy metals	1 000
	BTEX	10
	Sum of halogenated aliphatic hydrocarbons (NL: VGK)	10
	Sum of mineral, plant and animal fats and oils	200 000

Table B. Maximum content in a volume-proportional day sample

Measuring point	Parameter	Maximum (in µg/l)
M01, M02 & M03	Heavy metals	500
	BTEX	5
	Sum of halogenated aliphatic hydrocarbons (NL: VGK)	5

In order to comply with these discharge requirements for the mentioned substances, the following measures are taken:

- Use of alternative substances (that are less hazardous to the environment) where possible;
- If no alternatives are available, quantities used are reduced to a minimum;
- When used, discharge of these substances to sewers should be prevented as much as possible. This also applies to residues and to the cleaning of (auxiliary) materials (e.g. glassware).

<sup>2</sup> Heavy metals: Chromium, Copper, Lead, Nickel, Silver, Zinc.

<sup>3</sup> BTEX: Benzene, Toluene, Ethylbenzene en Xylene.

<sup>4</sup> VGK (Volatile Halogenated Hydrocarbons: Sum of Dichloromethane; 1,1-dichloroethane; trichloromethane (chloroform); 1,2-dichloroethane; 1,1,1-trichloroethane; tetrachloromethane; trichloroethylene; 1,1,2-trichloroethane; tetrachloroethylene; cis-1,2-dichloroethylene; trans-1,2-dichloroethylene.

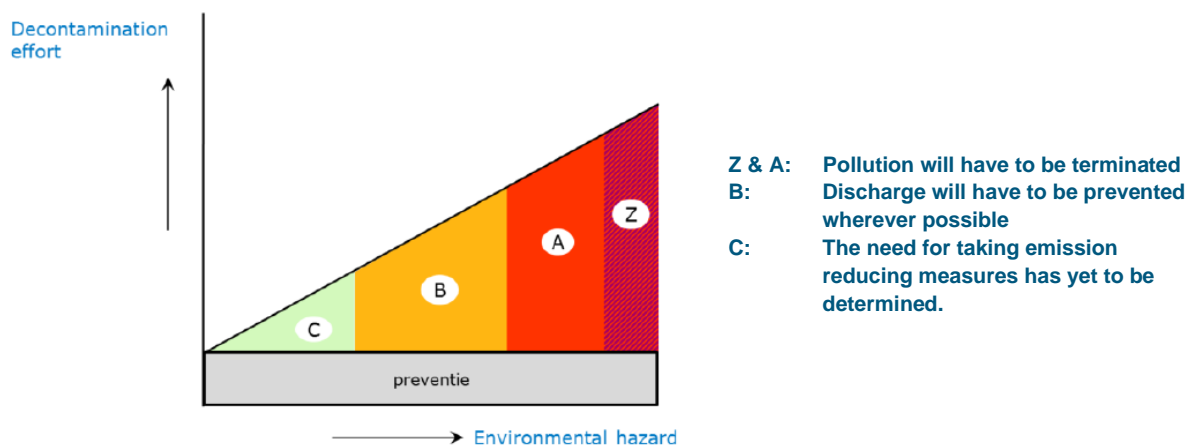
<sup>5</sup> M01: sample pit Antonie van Leeuwenhoeklaan, M02: sample pit Brandenburgerweg, M03: sample pit main entrance.

## Appendix 35.2: ABM-assessment: evaluation of substances (Z, A, B or C)

### ABM-assessment

To ensure proper implementation of the water quality policy it is considered necessary to have insight into the aquatic hazard of substances and/or mixtures to be discharged. The more hazardous a substance or mixture the more effort to decontaminate the discharge is required. This is schematically indicated in figure 1.

Figure 1: General relationship between decontamination effort and the aquatic hazard level of substances



The aquatic hazard of a substance depends on a large number of intrinsic properties, such as toxicity (acute or chronic), biological degradability and bioaccumulative potential (also based on the n-octanol/water partition coefficient (log Kow)), carcinogenicity, mutagenicity and reprotoxicity. According to the General Assessment Method (ABM) the substance is classified into one of the following four categories based on these data:

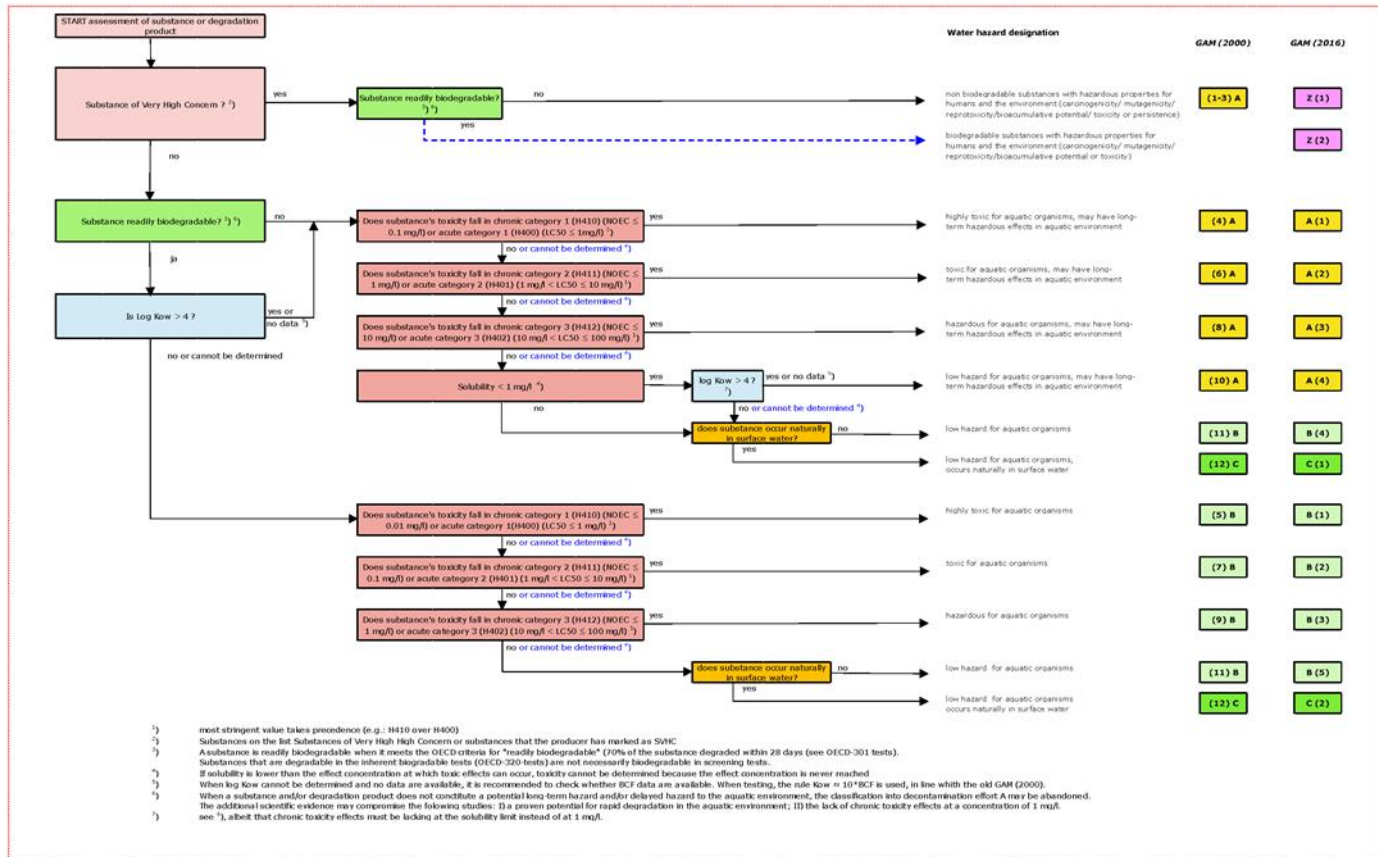
- Z: Substances of Very High Concern, SVHC, set of substances that are most hazardous for humans and the environment);
- A: not readily biodegradable aquatic harmful substances;
- B: readily biodegradable aquatic harmful substances;
- C: substances that occur naturally in local surface water.

Figure 2 indicates the assessment scheme used for the ABM.

Carcinogenicity, mutagenicity and reprotoxicity (among others by hormone disrupting effects) are not indicated in this scheme as a separate assessment criterion, but are classified into the category SVHC.

For the ABM a worst case approach is followed. If no data on specific properties is available, the worst case classification is used: either the most toxic category, or the property not readily biodegradable or log Kow > 4.

Figure 2 : General assessment method for substances



<sup>22</sup>The GAM uses a worst case approach. If no information on specific substance properties is available, a worst case scenario is applied: either the most toxic class or NOT readily biodegradable or log Kow >4.



**Appendix 35.3 List with cleaning agents, disinfection agents and boiler water treatment agents, buffer fluids and other substances that have already been assessed.**

Substance (or mixture) name	Category*	Indication aquatic toxicity (see appendix 35.2 for explanation)
Actisan	A (1)	Highly toxic for aquatic organisms, may have long-term hazardous effects in aquatic environment
Actril	B (5)	Low hazardous to aquatic organisms
Alpesin Daily	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Alphawash	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Arginine	B (5)	Low hazardous to aquatic organisms
Biokalk	C (2)	Low hazardous to aquatic organisms occurs naturally in surface water
CIP 100	B (3)	Hazardous for aquatic organisms
CIP 150	B (1)	Highly toxic for aquatic organisms
CIP 200	B (2)	Toxic for aquatic organisms
CIP 220	B (3)	Hazardous for aquatic organisms
Cosa CIP 92	A (2)	Toxic for aquatic organisms, may have long-term hazardous effects in aquatic environment
CSB	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Divosan etha plus	B (5)	Low hazardous to aquatic organisms
Ecola Alkanet	B (5)	Low hazardous to aquatic organisms
Glycerol	B (5)	Low hazardous to aquatic organisms
Glycine	B (5)	Low hazardous to aquatic organisms
Good Sense Power O1d NB	B (3)	Hazardous for aquatic organisms
Greencare Sanet Zitrotan	B (5)	Low hazardous to aquatic organisms
Greencare Tanet SR15	B (3)	Hazardous for aquatic organisms

Substance (or mixture) name	Category*	Indication aquatic toxicity (see appendix 35.2 for explanation)
Greencare Glass Cleaner	B (5)	Low hazardous to aquatic organisms
Halamid	B (2)	Toxic for aquatic organisms
Halapur	A (2)	Toxic for aquatic organisms, may have long-term hazardous effects in aquatic environment
Hepes	B (4)	Low hazardous to aquatic organisms
Klercide	B (1)	Highly toxic for aquatic organisms
Lubron 113	B (5)	Low hazardous to aquatic organisms
Lubron 401	B (3)	Hazardous for aquatic organisms
Lubron ASC	B (1)	Highly toxic for aquatic organisms
Lubron DM	B (1)	Highly toxic for aquatic organisms
MEIKOLON ÖkoClean FR	C (1)	Low hazardous to aquatic organisms occurs naturally in surface water
MEIKOLON ÖkoClean KS	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Mepol XM	B (5)	Low hazardous to aquatic organisms
Polacid	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Rogypal AC-309	B (4)	Low hazardous to aquatic organisms
Sanet Lavocid C	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Sanidur	B (3)	Hazardous for aquatic organisms
Sanifris Bio	B (3)	Hazardous for aquatic organisms
Sigma clean	B (1)	Highly toxic for aquatic organisms
Special kennel cleaner	B (4)	Low hazardous to aquatic organisms
Suma auto oven clean D9.10	B (4)	Low hazardous to aquatic organisms

Substance (or mixture) name	Category*	Indication aquatic toxicity (see appendix 35.2 for explanation)
Suma BAC D10	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Suma calc D5	C (1)	Low hazardous to aquatic organisms occurs naturally in surface water
Suma extend D3	B (5)	Low hazardous to aquatic organisms
Suma frit D9.1	B (3)	Hazardous for aquatic organisms
Suma multi purpose D2	B (3)	Hazardous for aquatic organisms
Suma revoflow max p1	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Suma star plus D1	B (2)	Toxic for aquatic organisms
Suma total D2.4	A (3)	Hazardous for aquatic organisms, may have long-term hazardous effects in aquatic environment
Tris (trometamol)	B (5)	Low hazardous to aquatic organisms
Vive Floor	B (3)	Hazardous for aquatic organisms
Vive Sanitary Gel	B (3)	Hazardous for aquatic organisms

\*: Category Z- en A-substances in principle may not be discharged, see appendix 35.2

**Appendix 35.4 Form for the assessment of the aquatic hazard of the substance or mixture**

Name organization	<input type="checkbox"/> BBio <input type="checkbox"/> InTraVacc <input type="checkbox"/> RIVM <input type="checkbox"/> Microeos <input type="checkbox"/> Cipla <input type="checkbox"/> PSP <input type="checkbox"/> _____
Laboratory/center/department	
User of the substance	
Trade name and name of the chemical substance	
Composition of the substance (if applicable)	
Building and room numbers of the substance use	
Annual substance consumption (kg or liters per year)	
Anticipated annual quantity in the sewer (kg or litres per year)	
Reasons for use and method of use (e.g. dissolving in water and cleaning floors)	
Required by law or regulation, or any other authority (e.g. European Pharmacopoeia) including motivation	
Research and results focused on alternative substance use (substance less harmful to the aquatic environment)	
Material Safety Data Sheet (MSDS)*	

\*: Provided by the supplier of the substance. Can be sent separately to the Stichting AL-terrein ([secretaris@stichting-alt.nl](mailto:secretaris@stichting-alt.nl)).