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**From:** Michael A. Sills  
**To:** WMKWM, WMRSR, WMSAY, WMKAW, WMJJD, WMTGL, WMJWB  
**Date:** 11/18/98 4:29pm  
**Subject:** NCES Bethlehem Leachate Exceeding State Mixture Rule

Folks,

Bob Watts called from Casella to inform me that the latest round of leachate TANK testing for NCES - Bethlehem has some tanks exceeding the 100 ppm limit for a state hazardous waste under the mixture rule. Please note that this leachate has not yet exceed any federal definitional limits.

Based on the above Bob would like to follow up with the approach we reviewed at the meeting. First they would get an EPA Generator I.D. # from Karen Way. Next they would have to manifest the leachate from the tank to the sewage treatment plant a POTW (Palmer, Ma I think) and then the POTW operator would send the state's copy of the manifest back to us. Because this is a state hazardous waste and not a federal one I believe we can waive some of the actual management criteria if it becomes difficult. For example the last time we researched this issue I don't believe there were any Septage Haulers that were licensed as hazardous waste transporters. The storage time might be another area.

In any event this is the basic process I discussed with Bob (without reference to waivers) . Do we all agree??

mike sills, 11/18/98

TOWN:	Bethlehem
PROJECT:	NCES Landfill
LETTER/DATA/PERMIT/FA/OTHER:	<del>OTHER</del> confidential

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