

From: Michael A. Sills
To: WMJJD, WMJWB, WMKAW, WMKWM, WMRSR, WMSAY, WMGL, W...
Date: 2/3/99 2:52pm
Subject: NCES Bethlehem Leachate Exceeding State Mixture Rule-MID COURSE RESULT

Folks,

Remember this issue??? After some talking and thinking (not necessarily in that order) and your comments I would like to propose that the point of generation of landfill leachate (for RCRA-C Hazardous Waste definitions purposes) be defined as that point or hydraulic appurtenance from which leachate is discharged or transported from the "facility". In the case of the attached example, if all leachate was collected, pumped or flowed to Tank # 5 and a vehicle pumped out of Tank #5 to transport leachate to a POTW(outside of the facility) then the quality of the leachate in Tank #5 would be the basis for both federally-based and state-based hazardous waste definitions. On the other hand if the operator chose to use Tank #'s 1-4 individually to pump into a vehicle then it would be the quality of the leachate in the actual tank (i.e hydraulic appurtenance) that was actually pumped out of that would be the basis for those hazardous waste definitions.

This approach is similar to the one we are using for the definition point of generation for MSW incinerator ash so is consistent with our past actions. In both cases the "facility" is defined as the property line.

This policy would apply to all MSW or MSW ash lined landfills.

What do you think.

PS Please note that the " after-the-fact waiver " for NCES is not part of this policy.

Thanks for your early thoughts or concurrence.

Mike Sills, 2/3/99

Mail Envelope Information

Subject: NCES Bethlehem Leachate Exceeding State Mixture Rule-MID COURSE
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From: Michael A. Sills

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Post Office WMD1.WMDPOST	Delivered	02/03/99 02:52pm
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WMKWM (Kenneth W. Marschner)		
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