

From: Michael A. Sills
To: WMJJD, WMJWB, WMKAW, WMKWM, WMRSR, WMSAY, WMTGL, W...
Date: 12/4/98 4:53pm
Subject: NCES Bethlehem Leachate Exceeding State Mixture Rule-MID COURSE RESULTS

Folks,

Thanks for your comments on my 11/18/98 E-mail on the subject leachate. As a consolidated response to a lot of questions and issues I would offer the following:

1. MSW Leachate in NH seems to be approaching the state mixture rule values for organics based on typical strength. I don't think anyone checked the national average quality for MSW leachate when we first proposed the state mixture rule.

2. The above facts in #1 only really affect that leachate which is transported by vehicle to a POTW. Leachate directly discharged into a sewer (e.g. TLR-Rochester) is still exempt from RCRA-C and the State Hazardous Waste Rules. Even in the case of vehicle transport a Generator ID and meeting the Generator requirements will be needed as will a manifest which is returned by the POTW operator. Because a state hazardous waste is involved and not a federal waste it would be helpful if waivers could be issued for transport by septage haulers and not necessarily hazardous waste haulers.

3. One remaining issue is whether a representative average can be calculated rather than directly measured. Say a landfill has 4 cells each with its own leachate tank and that there is a fifth tank that can take all the volume in #1-4. . Will it be possible for a state hazardous waste determination for the operator to sample and analyze all four individual leachate tanks first and then mathematically average the results before sending to tank #5 for pump out and transport? The rationale for doing it this way is that there may be only 1 or 2 tanks above the state mixture values and so at least 2 other tank contents could be sent to # OR even if some of the tanks are over maybe all 4 average below the mixture rule values. The problem comes in with doing the analysis first because based on at least one tank being over the mixture rule will we say that mixing that one tank with the three others causes the whole mixture to be a state hazardous waste, much like the federal concept. (i.e. can't dilute out the definition). However if we let all 4 tanks go down to #5 and only sample #5 and its below than the whole volume can go out as a solid waste. Please give me your final thoughts on this interpretation.

Thanks,

mike sills, 12/4/98

1/7/98 - Mike - Did this approach get general approval from the folks you sent it to for review?



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Ken

Mail Envelope Information

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From: Michael A. Sills

Created By: WMD1.WMDPOST:WMMAS

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