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TEL GASOLINE SLUDGE DISPOSAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 28 1989

Mr. B.W. Morse
Petroleum Advisor
Department of Commerce
and Consumer Affairs
Private Bag 00252
Gaborone
Botswana

Dear Mr. Morse:

Thank you for your letter of June 21, 1989, requesting information about environmental protection regulations, promulgated by the U.S. Environmental Protection Agency (EPA). Our response primarily focuses on the disposal of TEL gasoline sludge, a particular concern raised in the letter.

EPA lists tank bottoms (leaded) from the petroleum refining industry as a hazardous waste. As such, this waste must be managed in accordance with the U.S. Environmental Protection Agency standards published in the Code of Federal Regulations (Title 40), under Parts 260-272 (enclosed). Several of the relevant sections, i.e., standards for storage/treatment tanks and standards for landfills will be found in this document (see pages 556-567 and pages 581-586, respectively).

On August 17, 1988, EPA promulgated standards restricting the land disposal of certain hazardous wastes, including leaded tank bottoms from petroleum refining. The intent of this rulemaking is to minimize the quantity of hazardous waste being land disposed in the United States along with minimizing the toxicity of the waste when land disposal is necessary. Enclosed for your review, is a copy of this rulemaking, as well as the background document that contains information justifying the land disposal restrictions. These rules require that wastes be treated to levels achieved by the "Best Demonstrated Treatment Technology," (BDAT) prior to being land disposed. You will find

that EPA considers solvent extraction and incineration to be the BDAT for gasoline sludge waste. A temporary variance to the treatment technology can be granted for certain wastes because inadequate treatment capacity is available. These wastes are then land disposed in a landfill that has double liners and leachate collection above and between the liners.