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## RCRA/SUPERFUND HOTLINE SUMMARIES

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### Waste Storage in a Waste Pile

1. At land treatment units, operators often dump the waste to be treated on the ground, and within a few hours or a day, spread it on the land treatment area. Does this dumping of waste constitute storage in a waste pile subject to regulation?

This process is typical at many land treatment units. It may not be viewed as storage in a waste pile if the waste is dumped on the actual treatment area, and only remains for a limited period of time prior to spreading. If the waste is dumped in an area other than the treatment area, then it should be regulated as a waste pile or landfill. In general, though, EPA does not recommend such dumping and spreading of waste as an adequate land application procedure since the waste is not applied evenly. EPA would specify another method of application in the permit for the land treatment unit.

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