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RCRA/Superfund/OUST Hotline Monthly Report Question

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5. Hazardous Waste I.D.

Ground-water, contaminated by F001-F005 listed hazardous wastes, is removed from an aquifer during corrective action measures performed at an interim status hazardous waste disposal facility. After on-site steam stripping, the treated ground-water is transported, via trucks, to a local Publicly Owned Treatment Work (POTW) for discharge.

Prior to steam stripping, would the contaminated ground-water be classified as F001-F005 listed hazardous wastes? If so, what treatment concentration levels must be achieved in order for the ground-water not to be classified as F001-F005 listed wastes; thereby eliminating the requirements of having a manifest accompany each ground water shipment to the POTW?

The ground-water itself, is not listed F001 -F005 hazardous waste, but is subject to RCRA Subtitle C regulations because it contains F001-F005 listed hazardous wastes. If the ground-water is treated such that it no longer contains a hazardous waste, the ground-water would no longer be under RCRA Subtitle C jurisdiction (see EPA Memorandum from Marcia Williams of the Office of Solid Waste to Patrick Tobin of Region IV Waste Management Division, dated November 13,1986).

If the F001-F005 wastes contained in the ground-water are delisted, the ground-water would no longer be subject to Subtitle C and may be transported without a manifest to the POTW.