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BAN ON DISPOSAL OF LIQUIDS IN LANDFILLS

Mr. Bernard L. Jones
Project Manager
GSX Services of South Carolina, Inc.
Route 1, Box 255
Pinewood, South Carolina 29125

Dear Mr. Jones:

I am responding to your concerns, outlined in your March 26, 1985 letter, about Section 3004(c) of the RCRA Amendments dealing with the ban on disposal of liquids in landfills. I wish to clarify a number of points that you brought out in your letter.

In your Background section, you state that the law specifically prohibits the use of only biodegradable absorbents after February 8, 1986. The law (§3004(c)(2)) also prohibits the disposal of containerized liquid wastes when the liquids have been absorbed in materials that release liquids when compressed as might occur during routine landfill operations.

You also state that by your interpretation, fixation by direct chemical reaction with any or all waste components is required for bulk liquid wastes, in order to convert the liquid to a solid. Chemical stabilization is one option for dealing with bulk liquids hazardous wastes but not the only option. Enclosed is a revised guidance memorandum (May 9, 1985) that the Office of Solid Waste has developed for the bulk hazardous liquid provision. A copy of an earlier draft was sent to Mr. Richard Moon, Director of Research and Technical Assistance, GSX Services, on March 27, 1985.

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Your specific recommendations appear to be generally consistent with the policies described in the draft memorandum. I hope the enclosed guidance clarifies the Agency's current approach toward implementing the new statute. If you should have any questions or comments, please contact Paul Cassidy at 202-382-4682.

Sincerely yours,

John H. Skinner, Director
Office of Solid Waste

Enclosure

cc: Jack Lehman
Kenneth Shuster
Arthur Day
Paul Cassidy