

9487.1986(14)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

DECEMBER 86

3. Existing Units and Minimum Technology Standards

The owner/operator of an existing landfill unit which is holding F006 waste, wants to remove all the waste from the landfill in order to stabilize it. Once the waste is stabilized, it will be put back in the same landfill and the landfill will then be closed. Will this action change the status of the landfill from an existing unit to a replacement unit? If the landfill was then considered a replacement unit, would it have to meet minimum technology requirements under §3004(u) of RCRA before the stabilized waste is replaced?

A unit is considered a replacement if it is taken out of service and all or substantially, all waste is removed from it, and then reused. If the removal, stabilization, and replacement of the waste is part of closure, and no new waste is being added to the landfill, then EPA does not consider that the unit has been "reused". Therefore, the landfill would retain its status as an existing unit and would not have to meet minimum technology standards prior to replacing the waste.

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