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CONTINUED LANDFILL DISPOSAL OF LAB PACKS

Ms. Kathleen A. Ream  
American Chemical Society  
1155 Sixteenth Street, N.W.  
Washington, D.C. 20036

Dear Ms. Ream:

This is in response to your letter of March 22, 1985, in which you requested clarification of the potential effect of Section 3004(c) of RCRA, the "liquids in landfills" provision added by Section 201(a) of the Hazardous and Solid Waste Amendments of 1984 (HSWA), on the continued landfill disposal of "lab packs." I am aware of the efforts of the American Chemical Society during the evaluations of the HSWA and appreciate your position supporting environmentally-protective standards for the management of lab packs.

Currently, 40 CFR 264.314(b)(4) and 265.314(b)(4) allow the disposal of lab packs in landfills. RCRA Section 3004(c)(2) requires the Agency to promulgate regulations by February 8, 1986, which, among other things, minimize the disposal of containerized liquid hazardous waste in landfills. The legislative history to this provision suggests that Congress, in enacting Section 3004(c)(2), intended to allow the continued landfilling of lab packs in accordance with existing regulations. EPA plans to develop regulations under Section 3004(c)(2) which are consistent with this legislative history.

If you have further questions, please call either Alan Corson or Susan Bromm, of my staff (382-4770).

Sincerely yours,

John H. Skinner  
Director  
Office of Solid Waste

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