

February 1984/5

- Do portable treatment units connected to a process unit meet the totally enclosed treatment exclusion?

(4)

Yes, if the unit when connected to a process is in compliance with the Regulatory Interpretive Letter (RIL 84) which specifies the parameter of a totally enclosed treatment facility. Thus, portable treatment units could be used at multiple facilities and be excluded from regulation by 265.1(c)(9).

9471.
1984
(02)RPPC 9471.1984(02)
FB 12178

Source: Fred Lindsey

- Can leachate from a landfill or liquid hazardous waste be viewed as wastewater so that the wastewater tanks handling these waste streams are excluded from regulation by 265.1(c)(10)?

(5)

Wastewater has no regulatory definition, but a reasonable interpretation would be a process waste from an industrial process containing approximately 1% or less contaminants. Treatment tanks for leachate or liquid wastes such as spent solvents or ignitable liquids should not be excluded from regulation under 264.1(c)(10). It would be inconsistent to closely control wastes in a landfill and not control management of the hazardous constituents in the leachate from them.

9471.
1984
(01)RPPC 9471.1984(01)
FB 12182

Source: Steve Lingle and Fred Lindsey

- Must the owner or operator of a container storage facility in a downtown area check all nearby businesses for the possibility of injection or withdrawal wells in accordance with the 270.14(b)(19)(ix) topographic map requirement?

(6)

No, the owner or operator of the container storage facility does not have to check with the individual businesses in the city. He could, however, check with the city water department for potential wells. The State or city may also have a well drillers licensing board which could provide that information.

RPPC 9523.1984(11)
FB 12179

Source: Amy Mills and Burnell Vincent

- What is the definition of a withdrawal well used in 270.14(b)(19)(ix)?

(7)

There is no definition for withdrawal well. In order to expedite permit writing, the applicant is encouraged to show the location of wells that might be available for monitoring or which may be conduits for contamination. Active wells currently used to extract ground water for use should be identified as possible avenues of exposure to contamination.

Source: Burnell Vincent