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RCRA/SUPERFUND HOTLINE SUMMARY

MARCH 84

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

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.

Source: Steve Lingle and Fred Lindsey