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RCRA/ SUPERFUND HOTLINE MONTHLY SUMMARY

JULY 84

A. RCRA

1. When does one make the determination that a waste is liquid or solid prior to disposal in a landfill? The waste in question is normally solid but liquifies at temperatures reached in the vehicle transporting it to the site (>140°F) and occasionally at ambient desert surface temperatures (120°F in the summer). The material will solidify over a short period of time.

The phase of the waste should be determined just prior to disposal. In this case, the waste is liquified during transportation but will solidify over a short period of time. Therefore, it is proper to allow the shipment of containers to stabilize or solidify before performing the free liquid test. It is permissible to use best engineering judgment.

Source: Paul Cassidy
Research: Ken Jennings