



RCRA/CERCLA Coordination and Contaminated Media Guidance Draft Revision

Doug Outlaw
Hazardous Waste Regulation
Section



Permitting/Facility Remediation

- Construction Permit
- Operation Permit
- Postclosure Permit
- Corrective Action Permit
- Clean Closure Plan (Order)
- Emergency Permit
- Research, Development and Demonstration Permit
- RAP (Remediation Order for Generator Sites that Would Otherwise Become a TSD)

State Permits

- No Equalivent EPA Permit
- Used Oil Processor Permits – BK/HWM
- Mercury Reclaimination and Recovery – BK/HWM
- Documentation Management

Permitting/Facility Remediation

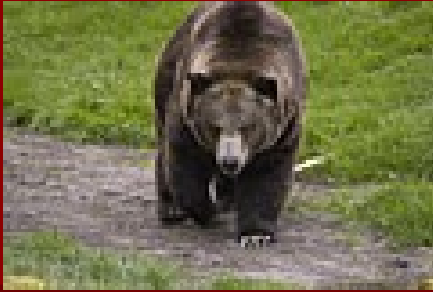
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Hazardous Waste

- Characteristic – Ignitability, Corrosivity, Reactivity and/or Toxicity Characteristic
- Listed
 - Non Specific Sources - F List
 - Specific Sources – K List
 - Discarded Commercial Products - P List
 - Discarded Commercial Products - U List



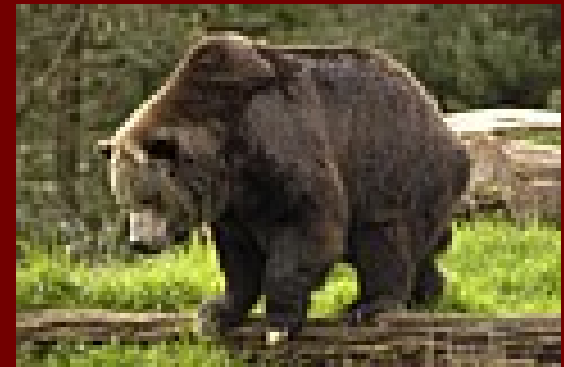
“Environmental media are subject to RCRA hazardous waste rules only if they contain a listed hazardous waste or exhibit a characteristic of hazardous waste”

Revised Draft Contaminated Media Management

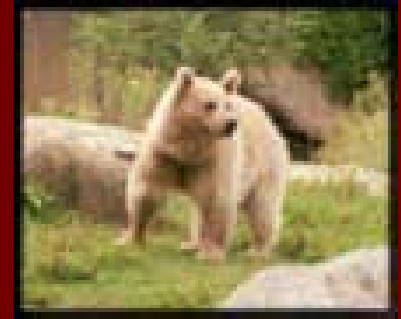
- Current Guidance in a FDEP Memorandum dated August 21, 2002
- EPA “Contained-In” Policy is discussed in EPA guidance letters and 63 FR 28555 dated May 26, 1998 – Page 28621
- Region 4 Guidance, September 7, 1999

Changes in The Draft

- Adds alternative LDR treatment standards for contaminated soil – 40 CFR 268.49
- Retains the LDR/UTS treatment standard in 40 CFR 268.40/48 for listed waste contained in determination for soils
- Reorganized for characteristic and listed waste



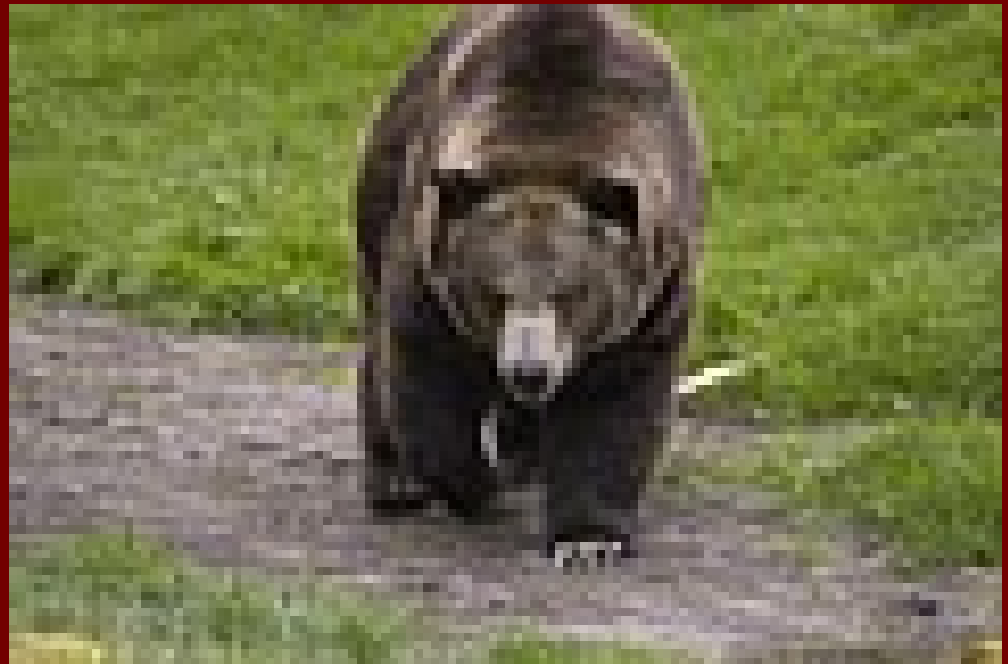
And More



- Media contaminated with a hazardous waste listed only for constituents that also have a specified toxicity characteristic may be managed as if the media had been contaminated with the corresponding characteristic waste – Table 1
- Media contaminated with a hazardous waste listed only for ignitability, corrosivity or reactivity may be managed as if the media had been contaminated with a corresponding characteristic waste only- Table 2

Groundwater/Surface Water

- No changes
- Chart in a table format



LDR/UTS TCE Example - Soils

- Spent solvent F001/D040
- Wastewater UTS 0.054 mg/L
- Non-Wastewater UTS 6.0 mg/kg
- Alternative LDR/UTS 60 mg/kg
- Residential CTL 6.4 mg/kg
- Industrial CTL 9.3 mg/kg
- Leachability 0.3 mg/kg
- TCLP 0.5 mg/L
- Soils concentration 53 mg/kg
- So what's needed if it not to be manages as hazardous waste?
- Contained-out determination, LDR/UTS
- Can go to Class I Landfill after meeting Industrial CTL removal of Characteristic if required. [Table 3, Case 5]

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Or

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