

TITLE: Area of Waste Placement

DATE
EFFECTIVE: 1997

HISTORY: Update of VA30002.97.004- Revision was necessary to clarify the technical content with the TGC document.

KEYWORDS: Reconsolidation, waste, disposal, management, placement, area

RULES: OAC 3745-27-13

QUESTION: Is reconsolidation of solid waste within the limits of waste placement considered disposal?

ANSWER: Authorizations granted under OAC 3745-27-13 and remedial actions with oversight from the Division of Emergency and Remedial Response often involve excavation of solid waste at the site. The solid waste is either removed and disposed at a licensed solid waste disposal facility or reconsolidated on-site. At one time, removal and disposal of the solid waste at a licensed solid waste disposal facility was thought to be the only acceptable management option. But reconsolidation is also an acceptable management practice.

Generally, DSIWM, DHWM and DERR have considered reconsolidation of waste that is within the area of contamination (in the case of hazardous waste) or within the limits of waste placement (in the case of solid waste) that is performed as a part of a site remediation, closure, or other activity approved by the Director as different from disposal.

SUMMARY: Reconsolidation of solid waste within the limits of waste placement is NOT disposal but is considered an acceptable management practice.

OHIO EPA
CONTACT: For any questions concerning this issue, please contact the VAP central office at (614) 644-2924.