



Alabama Drycleaning Environmental Response Trust Fund Act Remediation Waste Contained-in Policy Guidance

Environmental media (i.e. soil, groundwater, surface water, sediments) at Alabama Drycleaning Environmental Response Trust Fund Act sites may contain F or U listed hazardous wastes due to historical site activities. Remediation waste generated from these sites containing these types of materials can be analyzed and the listing may be removed in certain cases, thus allowing the waste to be managed at a solid waste landfill. Below describes the process for obtaining Departmental concurrence for removing the hazardous waste listing for certain wastes from these types of sites.

The Facility/Remediation Consultant should submit a written request to ADEM which includes the following (may be submitted electronically to wasteapprovals@adem.alabama.gov):

- Site History (i.e. historical land use, current operations, etc.)
- Site map
- Specific Contaminant of Concern (i.e. tetrachloroethylene/perchloroethylene)
- Specific Hazardous Waste Code(s) and specific media type(s) for “contained-in” determination (i.e. F002 or U210 if no other contaminants of concern are present)
- Specific quantity of contaminated environmental media for consideration
- Representative analysis for each environmental media waste stream including results for each of the following constituents:
 - Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,2-dichlorobenzene, and 1,1,2-trichloroethane.
- Proposed lined landfill disposal location including a complete ADEM Form 300 for pre-disposal approval authorization

The Department will review the information submitted and provide a written response regarding the “contained-in” determination for each contaminated environmental media type. As a part of this process, the Department compares reported concentrations of the above-referenced constituents to applicable Universal Treatment Standards (40 CFR 268.48) and Regional Screening Levels (<https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables> column TR = 1E-06 & THQ = 0.1) to ensure conservative, health based management of the waste. Please note, the “contained-in” determination would only remove the hazardous waste listing if approved. An appropriate characterization would be required for the waste in order to determine if any hazardous waste characteristics are exhibited. Following approval of the “contained-in” determination, the waste may be managed at a lined solid waste landfill upon receipt of a pre-disposal authorization from the Department.

Please note: This is not a self-implementing policy. A written determination from the Department must be obtained in order to remove the hazardous waste listing and a pre-disposal authorization issued prior to disposal at a solid waste landfill. Please submit any questions regarding this process to wasteapprovals@adem.alabama.gov.