

The Regulatory Maze for Dredged Material Disposal

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Background/Objectives: The presentation will provide an understanding of the off-site disposal regulations as they pertain to sediments that are non-hazardous, RCRA hazardous or TSCA regulated. The presentation will provide insight into the analytical needs for securing waste disposal approvals at Subtitle D (non-hazardous), RCRA or TSCA landfills, the obstacles typically encountered and the potential issues of focused analytical on contaminants of concern versus RCRA regulations. Attention will be focused on RCRA LDR requirements and amending sediment.

Approach/Activities: Presentation topics will include:

- Waste Characterization
- Treatment standards for Characteristic and Listed waste - 40CFR§268.40
- UHC's (Underlying Hazardous Constituents) - 40CFR§268.48
- LDR (Land Disposal Restriction) compliance
- Alternative Treatment standards for soil - 40CFR§268.49
- PCB Remediation Waste - 40CFR§761.61
- CAMU-eligible waste - 40CFR§264.552 & 264.555
- The role of the TSDF and the role of the Generator in the waste approval process.
- Passing Paint Filter is it dry enough?
- Ways to address the potential issues before they become obstacles or schedule stoppers.

Results/Lessons Learned: Working with disposal facilities early in the process can facilitate the waste disposal approval process. Adding amendments to sediments will prevent the issues with free liquid loads arriving at the disposal facility. In situ analytical data evaluations, early in the process may provide insight into areas that may be RCRA hazardous, TSCA regulated or both. Explore opportunities to reduce off-site disposal costs.