

Drycleaner Remediation Waste Guidance

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

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements for the management of hazardous contaminated media. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the Alabama Department of Environmental Management Administrative Code.

Due to historical site activities, 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. 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 municipal solid waste landfill. The procedure for seeking departmental approval to remove the hazardous waste listing for particular wastes from these types of facilities is outlined below..

The Facility or Remediation Consultant should send ADEM a written request that includes the following information (which can be emailed 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 municipal solid waste landfill where the waste will be disposed including a complete ADEM Form 300, Solid Waste Profile Sheet, for pre-disposal approval authorization

The Department will review the information submitted and respond in writing to each contaminated environmental media type's "contained-in" determination. As a part of this process, the Department compares reported concentrations of the above-referenced constituents to applicable Universal Treatment Standards (40 C.F.R. 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 keep in mind that only if the "contained-in" determination is approved, the hazardous waste listing will be removed. In order to determine if any hazardous waste characteristics are exhibited, a proper characterization of the waste would be required. Following approval of the “contained-in” determination, the waste may be managed at a municipal 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.