

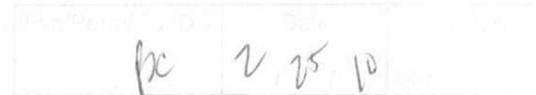


State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

April 25, 1990



Ms. Susan K. Childress  
Jackson Paper Manufacturing Company  
P.O. Box 667  
Sylva, North Carolina 28779

Subject: One Time Disposal of 700 Yd<sup>3</sup> of Petroleum Based Hydrocarbon Contaminated Soil at the Jackson County Landfill (Jackson Paper Mfg. Designated Area), (Permit #50-02)

Dear Mr. Childress:

General Statute 130A-294 authorizes the Solid Waste Management Division to regulate solid waste management in North Carolina. It, therefore, gives authority to the Division to evaluate wastes that may pose a threat to the environment or to public health and to subsequently prohibit disposal of these wastes at a sanitary landfill in accordance with Sections .0103(d) and (e) of the Solid Waste Management Rules, 10 N.C.A.C. 10G.

Your recent request for disposal of the subject waste has been reviewed and evaluated by section personnel. It is concluded that the waste is not suitable for landfill disposal at the designated facility because of the presence of 1,2-dichloroethane, chlorobenzene and dichlorobenzene. All three of these organic compounds are among the twenty five compounds which EPA has announced it is phasing into regulation under the adopted Toxicity Characteristic Leaching Procedure (TCLP). Although the contamination levels in the soil are reported as "totals" (and not analyzed using the TCLP test), the levels of chlorobenzene and dichlorobenzene present are highly significant. These are listed hazardous wastes under 40 CFR 261.31 - 261.33 with assigned hazardous waste numbers U037 and U070, U071 or U072 (depending if o,m, or p) respectively. For these reasons your request is denied. It is recommended that you contact the Hazardous Waste Section (Keith Masters, phone: 704 - 688-4237) to establish that the soil is not hazardous prior to attempting



STATE OF NORTH CAROLINA

DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES  
SOLID WASTE MANAGEMENT DIVISION  
SOLID WASTE SECTION

PROCEDURE AND CRITERIA FOR WASTE DETERMINATION

This procedure will be used by the Solid Waste Management Division to determine whether a waste is (1) hazardous as defined by 10 NCAC 10F, and (2) suitable for disposal at a solid waste management facility.

The types of wastes that will be evaluated by this procedure are primarily, but not exclusively, industrial and commercial wastes and sludges, and Publicly Owned Treatment Works Sludges.

The Solid Waste Management Division reserves the right to request additional information or waive some of the requirements based on the type of waste if it deems necessary. The Division may also require some wastes to be treated or altered to render the wastes environmentally immobile prior to disposal at a sanitary landfill. Wastes disposed at sanitary landfills must be non-liquid which can be properly managed in accordance with the "Solid Waste Management Rules". APPROVAL TO DISPOSE OF THE WASTE SHALL ALSO BE OBTAINED FROM THE OWNER OR OPERATOR OF THE LANDFILL PRIOR TO DISPOSAL.

The following information is required for an evaluation. Incomplete waste determination forms will be returned to the generator without review. An asterisk(\*) denotes information required for Publicly Owned Treatment Works.

A \* GENERAL INFORMATION

1. Name, telephone number and mailing address of facility or person generating waste Jackson Paper Mfg. Co.  
PO Box 667 E Main St  
Sylva NC 28779 704 586 5534
2. Specific location of waste (i.e. SR. #, county, city, etc...) E Main Street, Sylva, Jackson County, N.C.
3. What is the waste? Petroleum by product contamination of soil
4. What volume of disposal will there be? approx. 700 yd<sup>3</sup>
5. What frequency of disposal will there be? One time
6. Explain either the manufacturing process or how the waste was generated. The area that is contaminated was a drum storage area.

B INFORMATION FOR HAZARDOUS (RCRA) DETERMINATION (10 NCAC 10F .0029)

1. Is the waste listed under .0029(e) (i.e., 40 CFR 261.31 - 261.33)? If yes, list number. \_\_\_\_\_
- \*2. Does the waste exhibit any of the four characteristics as defined by .0029(d) (i.e., 40 CFR 261.21-261.24)? (Attach laboratory results for EP Toxicity, Reactivity, Ignitability, Corrosivity.) NO

7 INFORMATION FOR LANDFILLING DETERMINATION

Note: The following are established maximum leachable (EP Tox) contamination levels and pH for North Carolina Permitted Sanitary Landfills. Chemical analyses should be made at Minimum Detection Limits permitting assessment below the maximum levels. (The pH range shown is for individual data points. The average values accepted are normally 4.0-10.0).

<u>METALS:</u>		<u>PESTICIDES/HERBICIDES:</u>	
ARSENIC (ppm)	0.50	LINDANE (ppm)	0.040
BARIUM (ppm)	10.00	ENDRIN (ppm)	0.002
CADMIUM (ppm)	0.10	METHOXYCHLOR (ppm)	1.000
CHROMIUM (ppm)	0.50	TOXAPHENE (ppm)	0.050
LEAD (ppm)	0.50	2,4-D (ppm)	1.000
MERCURY (ppm)	0.02	SILVEX (ppm)	0.100
SELENIUM (ppm)	0.10		
SILVER (ppm)	0.50	pH (2:1 vol/wt.)	>2.0-<12.5

1. Does the waste contain any hazardous waste constituents listed in .0029(e), Appendix VIII (i.e., 40 CFR 261, Appendix VIII)? If yes, what constituents and what concentration? (Attach laboratory results) \_\_\_\_\_
2. What other constituents are present and in what concentration? (Attach laboratory results) \_\_\_\_\_
3. Will the handling and disposal of this waste create dust emissions which may cause a health hazard or nuisance to landfill personnel. NO
- \*4. Does the waste pass the "paint filter" test for free liquids (Method 9095 in S.W. 846)? (Attach laboratory results) yes
- \*5. Which solid waste management facility is the request for (name of landfill and permit number, incinerator, etc...)?  
Jackson County landfill - area designated for Jackson Paper Mfg use only
- \*6. Specify how the waste will be delivered - in bulk or containers (i.e. barrels, bags, etc.) waste will be delivered in bulk by truck

"I hereby certify that the information submitted in regard to contaminated soil (name of waste) is true and correct to the best of my knowledge and belief."

(print name) Susan K Childress  
 (signature) Susan K Childress  
 (title) Tech. Mgr.  
 (date) Feb. 16, 1990

All questions concerning this "Procedure" should be directed to the Solid Waste Section at (919) 733-0692. Answer specific questions in space provided. Attach additional sheets if necessary.

Complete all information, sign, and submit to:

Solid Waste Management Division  
 Solid Waste Section  
 P.O. Box 27687  
 Raleigh, N.C. 27611-7687  
 Attn: Waste Determination