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**STATE OF VERMONT  
AGENCY OF NATURAL RESOURCES  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
WASTE MANAGEMENT DIVISION  
SOLID WASTE MANAGEMENT PROGRAM**

**PROCEDURE ADDRESSING LIQUID WASTE DISPOSAL RESTRICTIONS IN  
MUNICIPAL SOLID WASTE LANDFILLS**

**Original: June 9, 1994  
Revised: February 21, 1995  
Revised: February 8, 1999  
Revised: December 15, 2010**

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MUNICIPAL SOLID WASTE LANDFILLS**

I. INTRODUCTION

On October 9, 1993 the new RCRA Subtitle D regulations, 40 CFR Part 258, Solid Waste Disposal Criteria, went into effect. The effective date was delayed to April 9, 1994 for any existing municipal solid waste landfill ("MSWLF") unit that disposed of 100 tons or less of solid waste per day. Section 258.28 contains restrictions on placing bulk, containerized, or non-containerized liquid waste into any MSWLF unit.

Section 6-801 of the current Vermont Solid Waste Management Rules allows the Secretary to designate certain types of wastes as special wastes if they present special environmental, public health, safety, management, or handling concerns. Additionally, Section 6-802(e) which pertains to "liquid wastes including septage and sludge", states that "prior to the disposal of these wastes in any discrete solid waste facility, written approval from the Secretary is required".

This procedure addresses liquid waste restrictions for any MSWLF unit.

**This Procedure supersedes the February 8, 1999, version.** This version contains a revision to the liquid testing frequency, as outlined in Section III (D) of this Procedure.

II. DEFINITIONS

The Solid Waste Management Rules define *liquid waste* as any waste material that is determined to contain "free liquids" as defined by Method 9095A (Paint Filter Test, contained in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Pub. No. SW-846)).

The following definitions are hereby adopted as part of this procedure and shall be referred to as necessary.

*Household waste* means any solid waste (including garbage, trash, and septage) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day use recreation areas).

*Gas condensate* means the liquid generated as a result of gas recovery processes at the MSWLF unit.

III. REQUIREMENTS

A. Bulk or non-containerized liquid waste may not be placed in a MSWLF unit unless:

- 1) The liquid waste is household waste other than septage; or
- 2) The liquid waste is leachate or gas condensate derived from the MSWLF unit if constructed with a composite liner and leachate collection system, and the permittee receives written authorization from the Secretary.

B. Containers holding liquid waste may not be placed in a MSWLF unit unless:

- 1) The container is a small container similar in size to that normally found in household waste;
- 2) The container is designed to hold liquids for use other than storage; or
- 3) The waste is household waste.

C. Septage or sludge, including municipal waste water treatment plant sludges, may not be placed in a MSWLF unit unless:

- 1) The septage or sludge is dewatered to 20% solids or greater prior to transport to the MSWLF unit; or
- 2) The septage or sludge is dewatered to 12% to 20% solids prior to transport to the MSWLF unit and does not meet the definition of a *liquid waste*.

D. Test results from at least one representative sample are to be used to determine whether or not the waste, when delivered to a MSWLF unit, meets the definition of "liquid waste". Testing on a quarterly basis, or other frequency as approved by the Secretary, is required for waste delivered on a regularly scheduled basis to a MSWLF unit. Documentation of waste disposed and associated test results shall be submitted as required by the Secretary.

E. Absorbent material may be added, or dewatering of waste may be done, prior to placement in a MSWLF unit, so that a waste is not considered a "liquid waste" and not subject to the disposal restrictions in this procedure.

F. In accordance with 10 V.S.A. Section 6621a, liquid waste and containerized liquid wastes specifically prohibited from disposal in a solid waste landfill, including any MSWLF unit, consist of:

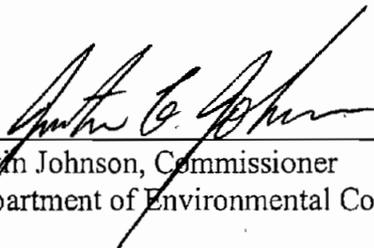
- 1) Lead-acid batteries;
- 2) Waste oil; and
- 3) Paint, paint thinner, paint remover, stains, and varnishes. This prohibition does not apply to solidified latex paint of less than one gallon, or quantities of solidified latex paint greater than one gallon if the paint is from a waste stream that has been subject to an effective paint reuse program.

The Secretary may suspend the prohibition of disposal of waste oil, paint, paint thinner, paint remover, stains, and varnishes upon finding that insufficient markets exist and adequate uses are not reasonably available to serve as an alternative to disposal. As of the date of this Procedure and unless otherwise noticed, the Secretary has found that reasonable alternatives to landfill disposal exist and that disposal of these wastes shall remain prohibited.

Effective date

This Procedure is effective upon date of Signature.

Signature

  
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Justin Johnson, Commissioner  
Department of Environmental Conservation

12/15/10  
Date