



DIRECTIVE NUMBER: 9480.03(85)

TITLE: Technical Justification for Closure Within 30 Days
of Last Receipt of Hazardous Waste

APPROVAL DATE: 8-2-85

EFFECTIVE DATE: 8-2-85

ORIGINATING OFFICE: Office of Solid Waste

☒ **FINAL**

☐ **DRAFT**

STATUS:

- [] A- Pending OMB approval
- [] B- Pending AA-OSWER approval
- [] C- For review &/or comment
- [] D- In development or circulating

REFERENCE (other documents):

headquarters

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Key Words: Closure, Final Cover

Regulations: 40 CFR 264.221, 264.251, 264.301

Subject: Technical Justification for Closure Within 30 Days of Last
Receipt of Hazardous Waste

Addressee: R. Kent Anderson, Land Disposal Branch

Originator: Susan Hughes, EPA Specialist, Financial and Assessment Branch

Source Doc: 9480.03(85)

Date: 8-2-85

Summary:

This memo describes design and operating standards required to minimize the formation and migration of leachate to adjacent subsurface soil ground water or surface water. The memo also addresses regulatory provisions for waivers from the liner and leachate collection and removal requirements; no waivers exist for the closure provisions.

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Technical Justification for Closure within 30 Days of Last Receipt of Hazardous Waste

R. Kent Anderson
Land Disposal Branch (WH-565E)

Susan Hughes, EPA Specialist
Financial and Assessment Branch (WH-562B)

I was able to find very little time specific information to support the above, however the following may be helpful.

The hazardous waste regulations are based on a two-part "prevention and care" system whose overall goal is to minimize the formation and migration of leachate to the adjacent subsurface soil, ground water, or surface water. The regulatory goal of minimizing the formation and migration of leachate is achieved through the design and operating standards that require the use of (1) a liner that is designed and installed to prevent any migration of waste out of the unit to the adjacent subsurface soil or ground water or surface water throughout the active life of the unit; (2) the installation of leachate collection and removal systems and run-on controls for waste piles and landfills, and the removal or solidification of wastes and waste residues at closure for surface impoundments; and (3) the placement of a final cover (cap) placed on top to minimize the percolation of liquids into the unit. EPA is relying principally on the final cover (cap) rather than the bottom liner to provide post-closure protection of ground water.

While the regulations contained provisions for waivers from the liner and leachate collection and removal requirements, no such provisions were allowed for the closure provisions. The reasons being that aside from ground-water protection, the final cover also: (a) prevents the "bathtub" effect (i.e., filling with leachate and overflowing); (b) protection of surface water from run-off; and (c) discouragement of direct access to the waste.

Source: Preamble to the July 26, 1982, Federal Register, Vol. 47, No. 143, pp 32312-32316.

WH-565E:Kent Anderson:pm:S206:382-4654:WSM:8/2/85



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