



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 31, 2007

Mr. Dan Koons
Immediate Response Spill Technologies
11760 Commonwealth Drive
Louisville, KY 40229

Dear Mr. Koons:

Thank you for your recent letter to Mr. Charlie Goddard, Chief of the Bureau of Solid and Hazardous Waste, inquiring into the standards for disposal of solidified hydrocarbon waste. Generally speaking, there is no prohibition on disposal of this waste in municipal solid waste landfills (which we call Class I landfills) in Florida. However, there are a couple of prohibitions that could possibly apply to this material.

First, Rule 62-701.300(4), Florida Administrative Code, prohibits this disposal of hazardous waste in landfills. You would need to demonstrate that this material is not hazardous by subjecting it to the Toxic Characteristic Leaching Procedure (TCLP).

Second, Rule 62-701.300(10) prohibits the disposal of liquid wastes in landfills. You would need to demonstrate that the material is not liquid by subjecting it to the Paint Filter Test.

If the solidified hydrocarbon waste passes each of these tests, then it can be landfilled in Florida, subject to any local ordinances and regulations. Please note that landfills can, and often do, set their own waste acceptance and refusal policies which may be more stringent than Department standards.

I hope this letter adequately addresses your concerns. If I can be of any further assistance, please feel free to contact me at 850-245-8750 or by email at raoul.clarke@dep.state.fl.us.

Sincerely,

Raoul Clarke, Administrator
Hazardous Waste Management Section

RC/rc

cc: Chris McGuire, General Counsel
Rick Neves, Manager, Used Oil Program
Richard Tedder, Administrator, Solid Waste Section