



**State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES**

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March 3, 2008

Mr. Dan Koons  
C.I. Agent Solutions  
11760 Commonwealth Drive  
Louisville, KY 40229

**SUBJECT:** Landfill Disposal of Solidified Hydrocarbons

Dear Mr. Koons:

This is in response to your e-mail and attached letter dated February 7, 2008 concerning your question about the disposal of small amounts of solidified oils in licensed solid waste landfills.

As I understand, your company produces a product, described as a dry granular material composed of food grade polymers, that is used to coagulate and bond with petroleum-based liquid spills. Your letter specifically mentioned the solidification of gasoline, diesel fuel, and refined motor oils in boat bilges or spilled on surface waters, with other uses in underground vaults and manholes. Your estimate of typical waste material volumes from cleanup efforts was 5 gallons or less.

You requested clarification on whether the solidified wastes could be disposed of in a solid waste landfill. The solidified wastes could be disposed of as solid waste in a licensed solid waste landfills if they did not possess characteristics that defined them as hazardous wastes under RCRA Subtitle C or Wisconsin's NR 700 rules or as a toxic waste under TSCA. The wastes should also not fail the free liquids criterion for disposal in MSW landfills, and they would also be subject to any policies or testing requirements imposed by landfill operators.

My opinion is solely concerned with the potential disposal of solidified wastes in licensed landfills and does not imply approval by the Department's Watershed Management program for use of the solidification product to surface waters for remediation of spills. Any approval for use in those situations has to come from our water program staff.

Sincerely,

Robert P. Grefe, P.E.  
Bureau of Waste and Materials Management

cc. Roxanne Chronert - NER  
David Woodbury - LE/8