

Hazardous Waste Management

Remediation and Investigation-Derived Waste

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing the management of remediation and investigation-derived waste. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in the Alabama Department of Environmental Management Administrative Code.

Various environmental programs administered by ADEM require some form of investigation and remediation. These programs include, but are not limited to:

- Alabama Drycleaning Environmental Response Trust Fund - a self-insured program that covers some of the costs for assessment and remediation of environmental contamination by drycleaning agents
- Alabama Hazardous Wastes Management and Minimization Act - a state program governing the generation, transportation, treatment, storage, and disposal of hazardous wastes, as well as the remediation of releases of hazardous constituents
- Alabama Land Recycling and Economic Redevelopment Act - a voluntary assessment and cleanup program that provides certain liability protections to current and future landowners
- Alabama Underground Storage Tank and Wellhead Protection Act - a state program that establishes construction, installation, and performance standards for underground storage tanks and water wells
- Comprehensive Environmental Response, Compensation, and Liability Act - a federal program that provides for the cleanup of sites where improper disposal of hazardous substances occurred prior to enactment of certain waste management regulations

The waste-generating activities are known by such names as Preliminary Assessment, Preliminary Investigation, Site Investigation, RCRA Facility Investigation, Remedial Investigation, Remedial Action, and Corrective Action, just to name a few. These activities may be conducted in areas that are contaminated with hazardous waste, hazardous constituents, and/or petroleum products and related wastes.

Investigation and remediation activities result in the generation of waste in various forms. This waste may include soil from soil borings or the installation of piezometers, or monitoring wells. Liquid waste, either surface water or groundwater, may also be generated during well installation or media sampling activities. Depending on the site location, waste sediments may also be generated. Treatment residuals may be generated as a result of on-site treatment of contaminated soil, sediment, surface water, and/or groundwater. The waste generated by all of these activities is classified as remediation or investigation-derived waste. **All waste that is generated as a result of investigation or remediation activities is a solid waste that must be managed properly.** ADEM Admin. Code rule 335-14-3-.01(2) requires anyone who generates a solid waste to determine if that waste is a hazardous waste. For regulatory purposes, waste environmental media is considered "generated" at the time it is removed from the ground.

Remediation and investigation-derived wastes may be treated and disposed on-site or may be transported off-site for treatment and ultimate disposal, depending on the site-specific circumstances under which the waste is generated. Regulations and/or permitting requirements for the following ADEM programs should be reviewed prior to treatment or disposal of remediation and/or investigation-derived waste:

- Alabama Air Pollution Control Program
- Alabama Hazardous Waste Program
- Alabama Solid Waste Program
- National Pollutant Discharge Elimination System
- Source Water Assessment Program
- State Indirect Discharge Program
- Underground Injection Control Program
- Underground Storage Tank Program

Refer to the following sites for additional information:

ADEM Administrative Code - <http://www.adem.alabama.gov/alEnviroRegLaws/default.cnt>

Hazardous Waste Determination Guidance - <http://www.adem.alabama.gov/programs/land/guidanceReports.cnt>