Re: Characterization, Disposal and Use of Automotive Shredder Residue (ASR) for Alternate Daily Cover (ADC) at Solid Waste Facilities in New Mexico.

1. ASR is considered a special waste (specifically an industrial waste) because it requires special handling;

2. Accordingly, a generator-specific Disposal Management Plan (DMP) approved by the NMED’s Solid Waste Bureau (SWB) is required prior to acceptance and disposal, and disposal may occur only at a solid waste facility permitted (or otherwise authorized) to accept industrial waste;

3. The ASR shall be tested for TCLP metals as determined by the SWB on a case-by-case basis;

4. The ASR shall be tested for PCBs using SW-846, USEPA Test Method 8082;

5. If the ASR tests results indicate $>50$ PPM for PCBs, the ASR shall be re-analyzed utilizing the leach test, in accordance with 40 CFR 761, to demonstrate that the ASR meets the standard of $<10$ μg/L for PCBs;

6. The solid waste facility’s owner/operator may not accept ASR that tests at $>50$ PPM for PCBs until after a successful demonstration has been made to the SWB that the leachate analytical results indicate $<10$ μg/L for PCBs;

7. If the ASR test results indicate $>500$ PPM for PCBs, the ASR shall not be disposed at a solid waste facility (landfill) in New Mexico [though one could suggest possible disposal at another state];

8. If the ASR test results indicate $>50$ PPM for PCBs, the ASR shall not be used as an Alternative Daily Cover at solid waste landfills in New Mexico – Regardless of the Leach Test results; and

9. Sampling frequency for both direct disposal or use as ADC shall be determined by the SWB on a case-by-case basis and incorporated into the generator-specific DMP.