

MEMORANDUM

DATE: October 2, 2023

TO: Thomas Buell- NDEE

FROM: AltEn Facility Response Group
Donald Gunster, Project Coordinator – NewFields

SUBJECT: Wet Cake Waste Classification
Solid Waste Pilot Project
AltEn Facility – Mead, Nebraska

In recent meetings with the Mead community, NewFields has been asked about the determination that wet cake at the AltEn site is not hazardous waste. This Memorandum provides further information about the characterization of the wet cake.

The wet cake satisfies the regulatory and permitting requirements to be disposed in Waste Management's (WM) Pheasant Point Landfill. WM's Pheasant Point Landfill is permitted to accept only non-hazardous waste. Wet cake has not been characterized as hazardous nor is it a listed hazardous waste per EPA Resource Conservation and Recovery Act (RCRA) or equivalent NDEE regulations. The process to confirm that it is not hazardous waste and acceptable for disposal at Pheasant Point required that a waste profile be completed for the wet cake that described its characteristics. In addition to describing the wet cake source in the profile, NewFields collected samples that were tested by a certified laboratory to verify that the wet cake did not have chemicals, constituents or properties that would make it a hazardous waste. As part of that analysis, the labs used standardized testing methods set out in EPA and NDEE's regulations, including the protocol known as the Toxicity Characteristic Leaching Procedure (TCLP). The wet cake was confirmed to be non-hazardous meeting WM's permit criteria and can be disposed of at the landfill. The basis of this determination is summarized as follows:

- Wet cake is not a listed hazardous waste.
- Wet cake does not possess the RCRA ignitability characteristic based on its flash point being greater than 60°C (140°F).
- Wet cake does not possess the corrosivity characteristic based on its pH ranging from 5.2 to 7.77 su, which is greater than 2.0 su and below 12.5 su.
- Wet cake is not a reactive waste.
- Wet cake does not possess the RCRA toxicity characteristic based on the TCLP results indicating that no constituents were present in the TCLP leachate at a concentration exceeding corresponding regulatory levels.
- Wet cake does not contain unacceptable levels of polychlorinated biphenyls (PCBs) (in fact the limited detections were at concentration three orders of magnitude less than the 50 mg/kg landfill acceptance criterion).

A summary of the analytical results are presented in Tables 1 and 2, which are provided as Attachment B.