

Office of Waste resource Management

MEMORANDUM

TO: Solid Waste Permitting Staff

FROM: Hassan Vakili
Director, Office of Waste Resource Management

DATE: August 23, 1994, references revised November 13, 2002

SUBJECT: Gas Condensate Recirculation

Recently, an issue arose during the Gas Training Seminar held at Innsbrook Wednesday, August 3, 1994, regarding the recirculation of gas condensate into landfills. The discussion centered on allowing landfills to recirculate gas condensate to the landfill, whatever the liner system, or lack of it, in place. To clarify this issue, I direct your attention to §280 E.2.c. of the VSWMR, which states:

“...Condensate generated from gas control systems may be recirculated into the landfill provided the facility complies with the liner and leachate control system requirements of this Part.”

Page 95 of the *EPA Solid Waste Disposal Criteria Technical Manual* further explains.

“Because ambient conditions are typically cooler, water containing corrosive and possibly toxic waste constituents may be expected to condense....The condensate can be returned to the landfill unit if the landfill is designed with a composite liner and leachate collection system per §258.40(a)(2).”

Therefore, gas condensate can be recirculated only onto landfills that have a composite liner and leachate collection system designed according to Subtitle D.