

SKAL 2002



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JOHN R. D'ANTONIO, Jr.  
SECRETARY

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

November 15, 2002

Mr. David Ashley  
EHS Manager  
Safety-Kleen Corp.  
6625 W. Frye Road  
Chandler, Arizona 85226

**RE: NOTICE OF DEFICIENCY (NOD)**  
**SAFETY-KLEEN SYSTEMS, INC. STORAGE FACILITY RCRA PERMIT**  
**APPLICATION, FARMINGTON FACILITY EPA ID NMD980698849**  
**HWB-SKFA-00-001 AND**  
**SAFETY-KLEEN SYSTEMS, INC. STORAGE FACILITY RCRA PERMIT**  
**APPLICATION, ALBUQUERQUE FACILITY EPA ID NMD000804294**  
**HWB-SKAL-02-001**

Dear Mr. Ashley:

After substantial review of the Safety-Kleen Farmington's (SKFA), October 4, 2000 permit application, Attachment A, *Waste Analysis Plan* (WAP) and the 2000 permit application Part A, Section 1.0, Attachments C, D and E, the existing SKFA operating permit dated April 4, 1991, and the August 20, 2002 draft permit wastes characterization requirements, NMED has made a determination that additional information is required prior to granting administrative completeness pursuant to 20.4.2.200 NMAC (A) (3) (a) and (b). The NMED comments are attached.

Please respond to this Notice of Deficiency within sixty (60) days of receipt of this letter.

Should you have any questions please contact Mr. Steve Pullen of my staff at (505) 428-2544.

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Sincerely,



James Bearzi  
Chief  
Hazardous Waste Bureau

cc: John Kieling, NMED HWB  
Will Moats, NMED HWB  
Robert Warder, PE, NMED HWB  
Laurie King, EPA Region 6 (6PD-N)

File: Red SKFA 00-001, Reading File  
Red SKAL 02-001, Reading File

NOTICE OF DEFICIENCY COMMENTS  
SAFETY KLEEN – FARMINGTON and ALBUQUERQUE

Regulatory citations in these comments only reference the applicable Code of Federal Regulations (CFR) requirements without including the associated New Mexico regulation for brevity.

NMED expects a response to each of these comments and altered permit application language where appropriate. The responses to these comments should be included in both the Safety-Kleen Albuquerque (SKAL) and SKFA permit application waste analysis plans since the WAP's are essentially identical and by doing so, will prevent an additional NOD being submitted for the SKAL facility.

General SKFA WAP Comments:

1. The WAP fails to identify the specific waste characterization regulations that must be addressed before wastes can be managed at the facility. NMED requires that Safety-Kleen address, at a minimum, the data quality objectives (DQOs) identified at Appendix I at the back of these comments. All appropriate DQOs are to be identified in the Introduction portion of the WAP. The WAP must also be augmented to include a discussion of how Safety-Kleen personnel will perform a QA/QC analysis to ensure that all waste characterization has met the DQOs.
2. The Safety-Kleen Farmington facility permit application fails to address all applicable land disposal restriction (LDR) regulatory requirements. Safety-Kleen must specify in the WAP how it will both accomplish these activities, and document these determinations as required by 20.4.1.800 NMAC (incorporating 40 CFR 268.7 (a) (6)), 20.4.1.300 NMAC (incorporating 40 CFR 262.10 (h) and 40 CFR 262.40 (c)). Safety-Kleen must specifically commit to ensuring that all hazardous wastes stored at the facility are characterized for all applicable LDR notification requirements as identified below;
  - a. Identify all hazardous constituents in prohibited hazardous wastes requiring treatment as required by 20.4.1.800 NMAC (incorporating 40 CFR 268.7 (a), 40 CFR 268.40 (a) (1) and (2)), including both the constituents associated with each waste listed in 40 CFR 268.40 as "regulated hazardous constituents", and all underlying hazardous constituents (UHCs) in characteristic hazardous wastes as required by 40 CFR 268.9 (a);
  - b. Identify applicable "waste code subcategories" as identified in Column 2 of the "Treatment Standards for Hazardous Wastes" table located in 40 CFR 268.40, as required by 40 CFR 268.7 (a), and as referenced in the Required Information

Column, Item No. 4, of the "Generator Paperwork Requirements Table" located in 40 CFR 268.7 (a);

- c. Identify the waste's applicable "treatability group" (i.e., wastewater or non-wastewater) as identified in Column 2 of the "Treatment Standards for Hazardous Wastes" table located in 40 CFR 268.40, and the "Universal Treatment Standards" table located in 40 CFR 268.48, and as required by 40 CFR 268.7 (a), as referenced in Column 1. Item No. 4, of the "Generator Paperwork Requirements" located in 40 CFR 268.7 (a), and as defined in 40 CFR 268.2 (d) and (f); and
- d. Identify whether the waste must be treated before it can be land disposed as required by 40 CFR 268.7 (a). To accomplish this, Safety-Kleen shall identify the applicable constituent concentration or technology based treatment standards for the wastes and/or the individual hazardous constituents as identified in the "Treatment Standards for Hazardous Wastes" table located in 40 CFR 268.40.

These requirements apply to all wastes managed at Safety-Kleen regardless of how long the wastes are stored, including wastes stored under a transfer basis.

3. NMED can find no commitment in the application to store prohibited wastes for less than one-year as required by 40 CFR 268.50. The application/WAP shall be altered accordingly.
4. The permit application fails to discuss whether any of the waste management activities performed by Safety-Kleen at both the facilities, would constitute the generation of a new waste or require a new manifest. The New Mexico Environment Department questions whether the aggregation of wastes with different LDR statuses is occurring at Safety-Kleen. Generator status determination in this circumstance depends primarily on the establishment of a waste's "point of generation". The definition of what the "point of generation" is and its implications are described in EPA's guidance manual, *Land Disposal Restrictions: Summary of Requirements*, dated August 2001 (EPA 2001). EPA 2001, Section 8.2 states, "for characteristic wastes, each change in treatability group constitutes a new point of generation". The permit application states in Section A.1.1, Paragraph 1, Item c, *Drum Washer/Dumpster Sediment*, that, "the chemical composition of this waste is very similar to that of the bottom sediment from the tank and therefore, carries the same EPA hazardous waste codes". The application fails to mention the possibility here or anywhere else of a change in LDR treatability groups and a resultant new waste.

Safety-Kleen shall explain the following;

- a. Whether the commingling or aggregation of wastes with different LDR statuses would constitute the generation of a new waste; and
- b. Whether segregating the sediments referenced in Section A.1.1 would constitute the generation of a new waste due a change in treatability group (referenced above).

The issue is relevant to waste characterization because the generator of a waste must create a manifest in accordance with 40 CFR 262 and perform a LDR status determination at the point of generation (POG) in accordance with 40 CFR 268.7.

5. The WAP suggests that a laboratory analysis was performed only four times on Safety-Kleen wastes in the period between 1997 and 1999 (i.e., four different waste streams were analyzed once). This information was gleaned from WAP Section A.2, which proposes to perform no analytical waste characterization at the point of generation because "the composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications". This Section also proposes no verification characterization will be performed at the Farmington facility because "with such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible." Annual characterization data from Attachment A-1 demonstrates four laboratory analyses. Safety-Kleen shall explain whether this observation is accurate.
6. In general, NMED considers the waste characterization commitments in the Albuquerque Safety-Kleen facility (SKAL) permit application, dated July 27, 2001, to be more detailed and thus preferable. Specific examples are provided below.
7. The WAP fails to recognize that before wastes are stored they must be characterized as to whether they are authorized wastes (i.e., included in the Part A portion of the permit application or not otherwise prohibited by the permit).
8. Safety-Kleen shall submit a copy of applicable Safety-Kleen Standard Operating Procedures (SOPs) as related to the characterization and sampling of hazardous wastes.

SKFA WAP Section Specific Comments:

1. Section A.1 - The second sentence inaccurately states that the specifications for SKFA's "products" are provided in Attachment A.1. Please explain how the table of annually waste stream characterization relates to SKFA product. NMED is interested in product characterization due to its association with related wastes. (See SKFA WAP Section Specific Comment 5.c).

2. Section A.1 - The second sentence references the table in Attachment A.1. Is this table representative of SKFA's documentation in response to the existing annual waste characterization permit requirement found in Permit Conditions II.C and Attachment A, Section A.3? If so, please explain why the table does not provide waste characterization information for wastes resulting from the dry cleaner service for SKFA.
3. Section A.1 - The second sentence references the tables in Attachment A.1. There are few other references to the tables in the text portion of the WAP. Safety-Kleen shall elaborate on the purpose of the tables. At a minimum, Safety-Kleen must answer the following questions;
  - a. Is the Attachment meant as an example of the data needed to fulfill the following requirements;
    - i. to repeat initial analysis of wastes to ensure that the analysis is accurate and up to date as required by 40 CFR 264.13 (b) (4); and
    - ii. SKFA Operating Permit Condition II.C, together with the Waste Analysis Plan (Permit Attachment A), Section A.3, commit to analyzing each waste type "at least once each calendar year".
  - b. Is Attachment A.1 meant to identify all applicable parameters to be analyzed for each hazardous waste as required by 40 CFR 264.13 (b) (1)? Is there a reason why this analysis data does not include other possible hazardous constituents as referenced at 40 CFR 268.40 (a)?
  - c. The WAP states that the Attachment data represents the "specifications for the products". It is NMED's understanding that the data represents constituent concentrations before the reclamation process. SKFA must provide a complete chemical description of all products resulting in wastes stored at the facility, including a description in chemical variability.
  - d. The tables demonstrate that for a particular waste type (e.g., waste aqueous cleaners), wastes from different SK service centers during a particular period of time (e.g., 1998-1999) had widely ranging hazardous characteristic constituent and other physical property values. Is SKFA implying that all wastes with hazardous characteristic constituent and other physical property values that fall within the maximum and minimum values presented on the Tables are the same wastes and can be aggregated or consolidated without requiring a new manifest?

- e. The tables all include a value for the 90<sup>th</sup> percentile of the upper confidence limit (UCL) for the 50<sup>th</sup> percentile. The WAP does not explain what this data is used for. SW-846 Chapter 9, Section 9.1.1.1 discusses the use of UCLs to evaluate the degree of sampling accuracy and precision of multiple samples of a single waste stream to determine whether it is hazardous. The tables represent numerous waste streams and thus are something very different than what is discussed in SW-846. SKFA must clarify.
- f. Safety-Kleen must explain the significance of the table notation “non-detect” (ND) when the detection limit of the analysis was significantly higher than the regulatory limit. The inappropriate ND occurs on numerous tables but is a particular problem on the table for waste dry cleaner bottoms – semi-volatile analysis. Safety-Kleen must explain why NMED should not make it a permit requirement that all analysis be performed to ensure that the method detection limit (MDL) be below the applicable regulatory limit, or that Safety-Kleen be required to record one-half the MDL instead of ND.
- g. Safety-Kleen must explain whether the “site” column necessarily indicates the Safety-Kleen service centers that shipped wastes to a recycling center and the number of shipments in a particular period (i.e., did SKFA not ship any dry cleaner, paint, or photographic wastes during the referenced periods?). Section A.1.1 (a) suggests that spent solvent is removed from the storage tank on a monthly basis yet this is not reflected in the table.
- h. The tables reference the following 11 different wastes;
  - i. Waste aqueous cleaners
  - ii. Waste dry cleaner filter powder
  - iii. Waste dry cleaner bottoms
  - iv. Waste immersion cleaner
  - v. Paint waste (other)
  - vi. Waste paint gun cleaner
  - vii. Waste parts washer solvent (105)
  - viii. Waste parts washer solvent (105/150)
  - ix. Waste premium gold parts washer solvent (150)
  - x. Waste parts washer sludge
  - xi. Waste parts washer tank bottoms

Safety-Kleen must explain why all of these wastes are not referenced in the Section A.1 of the WAP.

- 9. Section A.1.1 - The section in general describes wastes resulting from the parts washer service and applies characteristic waste codes to all the wastes but does not apply any of

the listed waste codes to the wastes. Attachment A.1 demonstrates that the wastes contain significant concentrations of trichloroethylene, tetrachloroethylene, and methyl ethyl ketone. These chemicals are all solvents in F001, F002 or F005 wastes. Safety-Kleen shall explain why the wastes resulting from parts washer service are not described as carrying a "F" code as the dry cleaner and paint wastes do. Furthermore, Safety-Kleen must explain why NMED should not require through the permit that wastes resulting from the parts washer service (see Section A.1.1) be analyzed on a periodic basis for the presence of all constituents of concern in the F001-F005 listed wastes referenced at 40 CFR 268.48.

10. Section A.1.2 - Paragraph 1, last sentence, states, "... other types of dry cleaning waste (e.g., freon) will be managed on a transfer basis only". Section A.5.c states that "unique or non-standard waste streams" will also be managed on a "transfer basis" only. Section A.7 states that for waste "managed on a transfer basis, the Subpart CC regulations do not apply". Safety-Kleen shall thoroughly explain why NMED should not require, through the permit, that all waste managed at the facility be managed subject to the requirements of 40 CFR Parts 264, 268 and 270 as is required by 40 CFR 262.34 (b) of any generator who accumulates hazardous waste for more than 90 days.
11. Section A.1.2 - Paragraph 2, Sentence 1, refers to the distillation of wastes from dry cleaner service. Safety-Kleen shall specify where this distillation process occurs. The WAP implies distillation may be happening at the generator locations or the Farmington service center. If the distillation process is occurring at either of these locations, Safety-Kleen must explain whether the distillation process is a materials recovery process meeting the definition of treatment provided at 40 CFR 260.10, and thus requiring a permit.
12. Section A.1.4 - This section references three photographic/imaging wastes, yet implies that none of them can be considered a hazardous waste. Safety-Kleen shall significantly elaborate on the regulatory status of these wastes. Sentence 1 states, "some photographic imaging wastes managed at the facility are not solid wastes per 40 CFR 261.2 (c) because their hazardous constituent is reclaimed." Is Safety-Kleen referencing this regulation in relation to the photo fixer solution from which silver may be recovered?

NMED understands that the U.S. EPA has made solid waste determinations on a material-by-material basis (See RCRA Regulations and Keyword Index, 2000 Edition, published by Aspen Law and Business (Aspen 2000) and the RCRA Hotline Question and Answer #54 (RCRA-54)). Safety-Kleen shall provide these EPA determinations.

13. NMED feels that it may be appropriate to identify wastes in the permit that are not subject to the permit, but to be consistent, all such wastes must be identified. Please provide a list of all materials (non-products) stored at the facility that might be considered

by an inspector to be hazardous waste subject to the permit and that Safety-Kleen feels are not subject to 40 CFR Parts 264, 268 and 270 permitting conditions. Furthermore, because the photo fixer solution which would normally carry a D011 waste code is obviously prohibited from land disposal under the LDRs, the off-site shipment of this waste must be accompanied by a LDR notification form as required by 40 CFR 268.7 (a) (1). That notice shall include the following information (see RCRA-126);

- a. EPA Hazardous Waste Number (waste code);
  - b. The hazardous constituents and their corresponding treatment standards and all other applicable prohibitions set forth in 40 CFR 268.32;
  - c. The manifest number associated with the shipment of the waste; and
  - d. Waste analysis data where available.
14. Section A.2 - Paragraph 3, last sentence, states, "... procedures to verify waste characteristics occur at several check points in the management of the solvent". The WAP identifies three checkpoints; the QC procedures performed when Safety-Kleen services its clients, when the wastes are transferred into the storage tank, and the annual characterization performed at the reclamation center. If Safety-Kleen has additional procedures to verify waste characteristics they must be elaborated on in the WAP.
15. Section A.2 - Paragraph 3, first sentence, references HWMR 206.B.3 inappropriately. NMED believes the appropriate and applicable regulation is 20.4.1.500 NMAC (incorporating 40 CFR 264.13 (a) (3) (i)).
16. Section A.2 - The SKAL permit application contains the following commitments that shall be included in the SKFA application, or provide a reason as to why they/it should not be included:
- a. Questionable wastes received at the service center shall be analyzed before they leave the facility;
  - b. The Branch Manager will be notified of any contamination that may have occurred. Furthermore, NMED requires through its omnibus authority specified in 20.4.1.900 NMAC (incorporating 40 CFR 270.32 (b) (2)) that Safety-Kleen commit in its WAP, to notifying the Hazardous Waste Bureau (HWB), Enforcement Program Manager of any contamination that may have occurred;
  - c. Training commitments; and

d. The procedures for wastes rejected at the time of service.

17. Section A.2 - The section implies that waste characterization will primarily be through acceptable knowledge (AK). Acceptable knowledge is defined in EPA guidance, "Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Waste" dated April 1994, as process knowledge and prior sampling data performed before the effective date of RCRA regulations. Current sampling and analysis is the preferred method, and the Permittee shall obtain characterization by sampling and analysis whenever feasible.

Acceptable knowledge may be used as the sole method to characterize waste only when the waste is from processes that are well documented with supporting information that address all characterization requirements of the permit, including the requirement to determine the LDR status of the waste as well as the other DQOs referenced at General Comment #1. Safety-Kleen shall maintain written documentation supporting the use of AK for each waste stream. SKFA shall include in the record all specific AK documentation assembled and used in the AK process, whether or not it supports the decision to use AK.

18. Section A.2.1 - Paragraph 2 states that as part of the QC procedures, a Safety-Kleen sales representative makes a visual examination of the wastes prior to recovery. Safety-Kleen must commit in Section A.6 of the WAP, to include a record of each of these QC examinations in both SKFA's and SKAL's operating record.
19. Section A.2.1.c - Safety-Kleen must elaborate on the sampling technique(s) used to determine whether the contents of a waste drum deviate from the description in the section. Safety-Kleen shall also describe the sampling techniques used to characterize waste at the service center as referenced in last paragraph of Section A.2.1.c.
20. Section A.2.3 - This section addresses paint waste but makes no mention of waste abrasive blasting media used to remove paint. This is generally a waste stream created at paint shops that is generally characteristically hazardous for metals. Does Safety-Kleen manage abrasive blasting media?
21. Section A.3 - This section shall be amended with a description of the quality assurance procedures to be used when performing laboratory analyses (e.g., equipment calibration and maintenance, data reduction and validation, and records management). The section must also be amended with a commitment to ensure those procedures are adhered to and documented in the both the SKFA and SKAL operating record.
22. Section A.3, Table A-1 - Table A-1 inappropriately lists "TCLP" as a parameter (the parameter is toxicity characteristic, TCLP is a sample preparation method) and fails to

address paint and photo chemical wastes. The SKAL permit application Section A.3 has a preferable discussion of waste parameters.

23. Section A.3, Table A-1 - Table A-1 must be augmented with a parameter and its associated rationale regarding the determination of a waste's LDR status. In fact, "determination of a waste's LDR status" can be the rationale and "hazardous constituent concentration" might be the parameter. Safety-Kleen shall alter other tables accordingly.
24. Section A.3, Table A-2 - Table A-2 must clarify that TCLP is simply a sample preparation method (which is not necessary when a waste is in liquid form). To determine a waste's toxicity characteristic, it may be necessary to first perform a leaching procedure (TCLP) and then perform a total analysis. The table should also identify the test method(s) Safety-Kleen will use to measure inorganic constituents in a waste.
25. Section A.3, Table A-3 - Table A-3 references U.S. EPA's *Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods*, SW846, Section 1.2.1.1. The current on-line version of SW846 available at <http://www.epa.gov/epaoswer/hazwaste/test/main.htm>, is not organized with sample collection methodologies at Section 1.2.1.1. Please reference the appropriate section of the on-line version. Furthermore, SW846 does say at Section 3.3.4, *Sample Collection*, that "The procedures describing how the sampling operations are actually performed in the field should be specified. A simple reference to standard methods is not sufficient, unless a procedure is performed exactly as described in the published method." Safety-Kleen shall amend the WAP accordingly.
26. Section A.3, Table A-3 - Table A-3 states that the sampling device to be used for solvent tank bottoms is the same device to be used for spent solvents. This device is the Copliwasa tube. SW846 Chapter 9, Section 9.2.2.3, states, "... the Coliwasa is a device employed to sample free-flowing liquids and slurries ...". Safety-Kleen shall explain how effective the Coliwasa is at sampling tank bottoms.
27. Section A.3, Table A-4 - Table A-4 states that the frequency of analysis for all wastes will be "at least annually". The SKAL permit application WAP, Section A.3.1, and the SKFA current operating permit WAP, commit to performing an abbreviated analysis on "every load received at the recycle center". If this is in fact standard Safety-Kleen procedure, it shall be referenced in the SKAL and SKFA WAPs.
28. Section A.4 - The section must recognize and reference the permit modification procedures at 20.4.1.900 NMAC (incorporating 40 CFR 270.42), *Permit modification at the request of the Permittee*.

29. Section A.5 - The section fails to address all applicable LDR notification requirements. Safety-Kleen must specifically commit to ensuring that all hazardous wastes stored at the facility, regardless of where the wastes are generated, are characterized for all applicable LDR notification requirements as identified at General Comment #2.
30. Section A.5 - The section shall be augmented to commit to maintaining in the SKFA and SKAL operating records, a copy of all LDR status notifications, including those for wastes generated onsite and for wastes received from off-site generators, as required by 40 CFR 264.73 (15) and (16). Additionally, please explain what is meant by the term "receiving facility" as used in the last paragraph of Section A.5.
31. Section A.5.b - NMED is unfamiliar with the waste type abbreviations "MS" and "IC". Please elaborate in the WAP.
32. Section A.6 - The section lists information to be kept in the facility operating record including numerous inappropriately listed non-waste characterization items that are not referenced elsewhere in the application. Safety-Kleen must relocate this information in a more appropriate location within the SKAL and SKFA applications.
33. Section A.6, Item 1 - The section inappropriately references a regulation as "Pt. V. sec.264, Appendix I". NMED believes the appropriate reference should be 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Appendix I). That regulation (which is applicable to SKFA and SKAL) requires, in part, the inclusion of a description of the process that produces a waste. NMED requires Safety-Kleen to include in its application a commitment to characterize the waste generating process as outlined at Appendix II.
34. Section A.6, Item 10 - The section references where LDR notifications are maintained. Safety-Kleen shall clarify the phrase "resource recovery (May 1994) branch manager's office". NMED requires that the LDR records be kept at the facility for inspection purposes.
35. Section A.7 - The section is titled "Waste Determination for Subpart BB and CC Compliance" but does not address characterizing wastes for their Subpart BB applicability by measuring their total organic concentration by weight. Safety-Kleen must amend the SKAL and SKFA WAPs accordingly.

## Appendix I

### Data Quality Objectives (DQOs)

Waste characterization data obtained through WAP implementation shall be used to ensure that the Permittee meets regulatory obligations at permitted hazardous waste storage units. A portion of the DQOs that shall be met for all waste characterization will be to comply with the following applicable Resource Conservation and Recovery Act (RCRA) regulatory requirements:

1. To determine all information which must be known to treat, store and dispose of the wastes in accordance with New Mexico's Hazardous Waste Regulations, 40 CFR 264.13 (a) (1);
2. To determine if the waste is hazardous 40 CFR 262.10 (c) and 40 CFR 262.11;
3. To ascertain the hazardous constituents in a waste stream to identify all applicable hazardous waste codes and all underlying hazardous constituents in accordance with 40 CFR 262.11, 40 CFR 268.7 (a) (2), and 40 CFR 268.9 (a);
4. To ascertain whether the waste must be treated before it can be land disposed in accordance with 40 CFR 268.7 and 40 CFR 268.9;
5. To ascertain whether a routine waste generating process has changed sufficiently to create a new waste stream and alternative regulatory requirements pursuant to 40 CFR 264.13 (a) (3) (i), 40 CFR 268.7 (a) (3) (iii), and 40 CFR 268.7 (b) (3) (ii);
6. To facilitate appropriate waste packaging for transportation in accordance with 40 CFR 262.10 (h);
7. To ascertain the presence and concentration of wastes constituents that might cause unlawful air emissions in accordance with 40 CFR 270.25 (a), 40 CFR 264.179, 40 CFR 264.200, 40 CFR 264.13 (b) (6), 40 CFR 264.601 (c) (1), 40 CFR 264.1050, and 40 CFR 264.1082;
8. To ensure that wastes are not inappropriately diluted to avoid LDR treatment requirements in accordance with 40 CFR 268.3;
9. To determine the presence of prohibited materials in accordance with 40 CFR 268.50 (f);
10. To determine the presence of free liquids in wastes in accordance with 40 CFR 270.15 (b) (1), 40 CFR 264.13 (b) (6);

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11. To ascertain waste/waste and waste/container compatibility characteristics in accordance with 40 CFR 270.15, 40 CFR 270.16, 40 CFR 264.172, 40 CFR 264.177, and 40 CFR 264.199; and
12. To ascertain waste ignitability and reactivity characteristics in accordance with 40 270.16 (j), 40 CFR 264.17 (a), and 40 CFR 264.198 (a).

## Appendix II

### **Waste Process Information**

The Permittee shall obtain process knowledge documentation from the generator that is explicitly relevant and traceable to each waste stream. The following information presents process knowledge the Permittee are required to obtain:

1. Area(s) and/or building(s) from which the waste stream was or is generated;
2. Waste stream volume and time period of generation;
3. Description of waste generating process; and
4. Material inputs or other information that identifies the chemical content of the waste stream and the physical waste form.