

DelHart, LLC

**FOR YOUR INFORMATION**

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Re: **WAP Outline**

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Stephanie,

Here is the outline that I am currently working to for the WAP. Sorry to take so long to get it to you. I have also sent an electronic version to Steve Zappe's address. Take a look at it and let me know if you have any comments. Changing the order at this point will not be a big deal.

Thanks,

Trey

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## 4.0 Waste Analysis Plan

### 4.1 Regulatory Requirements

### 4.2 Description of Hazardous Wastes Managed at the Facility

#### 4.2.1 Eligible Waste

#### 4.2.2 Prohibited Waste

### 4.3 Waste Acceptance Criteria

#### 4.3.1 Pre-Acceptance Requirements

##### 4.3.1.1 Pre-Shipment Procedures

##### 4.3.1.2 Submittal of Waste Profile

##### 4.3.1.3 Representative Sample Analysis

###### 4.3.1.3.1 Comparison of Independent Lab Results and Waste Profile

###### 4.3.1.3.2 Discrepancy Resolution

##### 4.3.1.4 Determination of Acceptability for Storage, Treatment, or Disposal

###### 4.3.1.4.1 Notification to Onsite Laboratory of Fingerprint Parameters

###### 4.3.1.4.2 Scheduling of Shipment

*This section will cover the first two steps of Figure 4-2. The description for incoming waste shipments will begin with the 24 hour notification.*

#### 4.3.2 Incoming Waste Shipment Procedures

##### 4.3.2.1 Notification and Approval of Waste Shipment

##### 4.3.2.2 Waste Shipment Documentation

###### 4.3.2.2.1 Documentation Review

###### 4.3.2.2.2 Discrepancy Resolution

4.3.2.3 Receipt Inspection and Sampling

4.3.2.4 Fingerprint Analysis

4.3.2.4.1 Discrepancy Resolution

4.3.2.5 Waste Disposition

4.3.3 Ongoing Waste Acceptance Procedures

4.4 Waste Analysis Parameters and Requirements

4.4.1 Parameters

4.4.2 Required Screening and Analyses

4.4.3 Supplemental Analyses

4.4.4 Waste Fingerprint Testing and Analyses

4.4.5 Waste Analysis for Storage, Treatment, and Disposal

4.4.5.1 Analysis to Ensure Compliance with Permit Requirements for Storage

4.4.5.2 Analysis to Ensure Compliance with Permit Requirements for Treatment

4.4.5.3 Analysis to Ensure Compliance with Permit Requirements for Disposal

4.4.6 *Waste Analysis* ~~Analyses~~ Requirements for Facility-Generated Waste

4.5 Sampling Methods

4.5.1 Random and Composite Sampling

4.5.2 Sampling Quality Assurance and Quality Control

4.6 Analytical Methods

4.6.1 Laboratory Quality Assurance and Quality Control

4.6.1.1 Laboratory Quality Assurance

#### **4.6.1.2 Laboratory Quality Control**

#### **4.6.2 Analytical Procedures**

#### **4.6.3 Laboratory Maintenance**

### **4.7 Record Keeping**

#### **4.7.1 Waste Tracking**

##### **4.7.1.1 Waste Generated Off-Site**

##### **4.7.1.2 Waste Generated On-Site**