



“How to Complete” USEI’s Waste Product Questionnaire (WPQ)

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This guidance document provides general instructions on how to complete USEI’s WPQ for permit required waste stream review. This guidance applies to the current WPQ, which can be acquired from USEI’s Customer Service Specialists or in PDF form from American Ecology’s website (www.americanecology.com). Regulations relative to hazardous wastes are extensive and varied and this guidance is not intended to define all hazardous waste generator and disposal scenarios. For further guidance, please refer to 40 CFR Parts 260 through 270. For specific waste acceptance procedures please contact USEI’s Customer Service team.

Section A- Generator information:

1a: Provide the Generator’s name, both site and mailing address, telephone number and technical contact. If the material is a RCRA hazardous waste, please provide the Generator’s status (e.g. CESQG, SQG, LQG). If the generator of record is not the original generator please note the original generator in line 1.a (e.g. ABC broker for XYZ Chemical)

See Hazardous Waste Generation rate, §§ 261.5, 262.44 to determine generator status.

1b: Provide the contact name and telephone number for off-spec (non-conforming waste) and the 24 hour, 7-day/week contact for emergency contact scenarios (Chemtrack, etc.). If USEI receives a material that does not conform to the WPQ or if additional information is required, the individual listed in Section 1b will be contacted.

Provide the Generator’s EPA ID number. **Please note that an EPA ID number is not required for Conditionally Exempt Small Quantity Generators (CESQG) or for**

non-RCRA and/or non-hazardous wastes. Please use “N/A” for EPA ID numbers for Non Regulated/Non RCRA material and “CESQG” for Conditionally Exempt Small Quantity Generators. All other wastes will require an EPA ID number. EPA ID numbers can be acquired by contacting your State or Federal EPA as appropriate.

Provide the Billing/Broker information, as appropriate.

Section B- Waste Characterization:

1. Provide the “common name” for this waste (e.g. lead contaminated soil, bag house dust, etc.).
2. Describe the process that generated the waste. Please provide as much detailed information as possible and at a minimum provide adequate information for USEI to identify safety hazards and determine if this process is specifically regulated under RCRA. For example, “waste water treatment sludge from electroplating operations” is a specific waste type and source that is regulated under RCRA with known hazards.
3. Provide an estimated annual quantity and unit of measure (e.g. tons, yards, gallons, etc.). If not known please write “unknown”.
4. Provide estimated shipment duration. For example, is this an on-going waste stream more than a year (permanent)¹, less than a year, which could be a clean-up or remediation (temporary), or is it a single shipment (one time).
5. Describe the shipment mode and containers (i.e., bulk, drums, etc.).

Section C- Physical Properties:

1. Will the material as shipped pass the paint filter test, or does the waste have the potential to contain “free liquids”?
2. Describe the physical appearance of the waste (e.g., soil with scrap metal). Please provide detailed information for USEI to use when performing a visual confirmation inspection².
3. Is the waste ignitable (*See §261.21*); i.e., flashpoint <140⁰ F?
4. Is the waste reactive (*See §261.23*)?
5. If material is a liquid, provide the expected pH range (*See §261.22*).
 - 5.1 Provide the actual pH, if available.
 - 5.2 “N/A” may be marked if the material is a solid (alternatively, solid may be mixed with liquid and pH determined)
6. Describe any odor (e.g. “slight solvent”, etc.).
7. Provide the expected viscosity of the liquid, if the material is a solid, mark “N/A.”

¹ This information will assist USEI to determine if the profile will need to be renewed on its anniversary date. USEI is required by the facility permit to recertify on-going waste streams annually.

² This information is documented on USEI’s work orders and is used when chemical technicians inspect bulk waste shipments and containers. Any material that does not reasonable match the physical description will be place on hold and will delay the off-loading while USEI contacts the broker/generator as appropriate.

8. If the material is a solid, determine whether or not the material has the potential for the presence of incidental liquids due to transport (rain, etc.) or other reasons. If the material is a liquid or sludge, mark “N/A.”
9. If the material is destined for Thermal Treatment mark “Yes” and complete the section as necessary. If not, mark “No” and proceed to Section D.

Section D- Chemical/Physical Composition:

This section provides information necessary for USEI to determine potential regulatory status as well as necessary treatment requirements.

1. Provide information relative to waste characterization. The preferred characterization method is laboratory analysis which should be provided along with the WPQ for USEI review. Similarly, if an MSDS or other characterization form is used please provide a copy for review. Process/Generator Knowledge may only be used if there is sufficient information to determine potential hazards and regulatory status of the waste. When relying on process knowledge please provide any available information to support the characterization. A combination of methods is often helpful when determining the status of a potential waste stream. Mark all applicable boxes. The type of characterization necessary to safely treat and dispose of a waste stream is dependent of the type of waste in question and must be determined on a case by case basis. In general, the best approach to ensure the most efficient processing of a waste stream is to provide as much information on the waste as possible.
2. Provide a list of all known Toxic Release Inventory (TRI) chemicals, their Chemical Abstract System (CAS) number (See TRI, Section 2- List of TRI Chemicals) and the method of measurement (e.g. TCLP, totals, MSDS, etc.)³ Also provide all physical components (e.g. soil, debris, water etc) and RCRA regulated contaminant concentrations.

Note: If debris is mixed with the waste, describe the percentage, size and nature of the debris (e.g. 2-5 % concrete, asphalt, and demolition debris, less than 2 feet in size) (*See §268.2 for the EPA definition of debris*).

Section E- Waste Classification

1. Provide the type of waste to be disposed, e.g. RCRA hazardous, TSCA, etc. Please note more than one box may apply (e.g., CERCLA, RCRA Hazardous).
2. Provide the applicable EPA Waste Codes. If EPA waste codes are not applicable write “NONE” in one of the boxes provided. Please provide the applicable Form Code. A complete list of Form Codes can be found in EPA Biennial Hazardous Waste Report, instructions and forms. For additional information, please contact USEI’s Customer Service team for assistance.
3. Please provide any State Waste Codes, if applicable.

³ This information is used by USEI to comply with TRI annual reporting requirements.

4. Provide further waste characteristics as described. Please note that if the material also contains a low activity radiological component or an exempt radiological item, USEI requires the completion of a WAC Addendum. Please contact USEI Customer Service for further direction.⁴

Section F- U.S. DOT Shipping Description

1. Determine if the material is a hazardous material per DOT regulations.
2. Provide the reportable quantity (RQ), per DOT regulations, if applicable⁵.
3. Provide the Proper Shipping Name (PSN) that will appear on the manifest.
4. Provide the Hazard Class per DOT regulations.
5. Provide the UN or NA number per DOT regulations.
6. Provide the packing group per DOT regulations⁶
7. Provide additional DOT description, if applicable (e.g. contains lead, etc.).

Section G- Certification:

1. Indicate if the waste has been treated (*as defined in 40 CFR §260.10*).
If yes: 1a. Provide treatment method, if appropriate⁷
If yes: 1b. Provide information on additives used for the treatment process.
2. Does the waste contain less than 500 ppmw VOCs ? (See §265.1080 and Appendix VI for compounds with a Henry's Law constant less than 0.1 Y/X) If the waste is less than 500 ppmw, indicate with the "Yes" box checked. Multiple methods may determine VOC concentration, including process knowledge and volatile and semi-volatile analysis.
3. Does the waste material contain any 40 CFR 268 Appendix III Halogenated Organic Compounds? If none present, mark the appropriate box, if present, provide the appropriate range.⁸
4. Is the generator subject to the Benzene rule?⁹ Check the appropriate box.
5. Is the waste restricted under the LDR program? If "Yes," see below. If "No," proceed to Number 6.

If the answer to number 5 is "Yes" provide information for the sub-category in 5a (waste water, non-waste water or debris (>50% debris 60 mil). Under 5b provide certification that the material either requires treatment (No) or that this material

⁴ If there is a radiological constituent, USEI requires a completed Waste Acceptance Criteria (WAC) addendum. The WAC will contain specific information such as isotope and concentration. If you need assistance to complete the WAC addendum, contact USEI's Customer Service team.

⁵ If the waste is not a hazardous material and no RQ is applicable, write "material not regulated by DOT".

⁶Numbers 1 through 6 are not applicable if the waste is "material not regulated by DOT"

⁷ If G.1 is marked "no," do not complete 1a or 1b.

⁸ This information is primarily used for soil remediation waste that also contains PCB's as a UHC. If you have any questions, please call USEI's Customer Service team for guidance.

⁹ Subpart FF of NESHAPS (40 CFR §61, Subpart FF) is primarily chemical manufacturing, coke by-product recovery plants, petroleum refineries and TSDF's that treat waste from these facilities. USEI uses this information, if appropriate, to track the total quantity of Benzene managed on an annual basis for reporting requirements.

may be direct landfilled (Yes). Under 5c, if the waste is a RCRA characteristic waste (EPA D codes) then the generator needs to determine if there are any Underlying Hazardous Constituents (UHC's) that are reasonably expected to be present (*See §268.2(i), 268.7(a) and 268.4- UTS Table*)¹⁰.

6. Provide the Generator's or authorized person's signature.

Please remember to schedule your waste shipment to USEI 48 hours in advance by calling Customer Service at (800) 274-1516.

¹⁰ If you need assistance, please call USEI's Customer Service team.