ATTACHMENT C

SYDCOL WASTE TRANSFER FACILITY
WASTE ANALYSIS PLAN
FOR RCRA HAZARDOUS WASTES
[270.A (270.14(b)(2)(3))]

June 25, 2021

TABLE OF CONTENTS

1.0 INTRODUCTION 1
1.1 Waste Analysis Plan Regulations and Guidance 1
1.2 Waste Analysis Plan Purpose 1
1.3 Waste Analysis Plan Requirements 1
2.0 FACILITY INFORMATION 3
2.1 Facility Location 3
2.2 Facility Operations 3
2.3 Facility Description 3
2.4 Hazardous Waste Management Units 3
2.5 Employee Health and Safety Training 4
3.0 ACCEPTABLE AND UNACCEPTABLE WASTES 5
3.1 Facility Permitted/Acceptable Wastes 5
3.2 Facility Non-Permitted/Unacceptable Wastes 5
4.0 PRE-ACCEPTANCE WASTE PROFILE PROCEDURE 7
4.1 Generator-Supplied Waste Profile Submittals 7
4.2 Waste Profile Approval Criteria 8
4.3 Land Disposal Restrictions 8
4.4 Waste Profile Recertification 9
5.0 WASTE ANALYSIS PROCEDURES 11
5.1 Fingerprint Analysis 11
5.2 Lab Packs & Other Waste Not Requiring Sampling 12
5.3 Recording Acceptance Fingerprint Analytical Results 13
6.0 WASTE ACCEPTANCE PROCEDURES 15
6.1 Level I Analysis 15
6.1.1 Load Inspection 15
6.1.2 Representative Sampling 15
6.2 Level II Analysis 16
6.3 Special Procedures for After Hour Deliveries 17
7.0 DISCREPANCY POLICY 19

7.1 Discrepancy Criteria 19
7.2 Non-Conforming Waste Procedure 19
8.0 REJECTION POLICY 21
9.0 SAMPLING METHODOLOGY 23
9.1 Sampling Rationale 23
9.2 Sampling Equipment 24
9.3 Maintaining and Decontaminating Sampling Equipment 24
9.4 Sample Collection 24
9.5 Chain-of-Custody 25
10.0 LABORATORY TEST METHODS AND PROCEDURES 27
10.1 Laboratory Test Methods 27
10.2 Laboratory Sample Preservation 27
10.3 Fingerprint Analysis QA/QC 27
10.4 Sample Receiving Procedure 28
10.5 Maintenance of Laboratory Custody 28
10.6 Laboratory Analysis Evaluation 29
10.7 Third-Party Laboratory Data Evaluation 29
11.0 WASTE COMPATIBILITY 31

TABLES

1. Hazardous Waste Codes
2. Waste Analyses Test Applicability
3. Sampling Equipment
4. On-site Laboratory Fingerprint Test Methods
5. Third-party Laboratory Analysis Methods

FIGURES

1. Site Location Map
2. Site Plan

APPENDICES

A. Example Waste Profile Form
B. Example LDR Notification/Certification Form
C. Industry-Standard Unpublished Methods

1.0 INTRODUCTION

1.1 Waste Analysis Plan Regulations and Guidance

This WAP describes AA Sydcol's procedures for evaluating waste characteristics. This WAP was developed in accordance with the requirements of 40 CFR 264.13(b) and AAC Title 18-8 in support of AA Sydcol's RCRA Part B application. Considerations This WAP was structured and developed with consideration of the EPA's *Waste Analysis at Facilities that Generate, Treat, Store and Dispose of Hazardous Wastes – Final, A Guidance Manual,* dated April 2015. A list of all acronyms and a definition of key terms used in this WAP is provided with General Information provided in Appendix A of Attachment A of the RCRA Part B permit application,

1.2 Waste Analysis Plan Purpose

The purpose of this WAP is to describe the methods, procedures, and equipment that will be used to perform the inspection, testing, analysis, handling, storage, and recordkeeping of hazardous waste accepted at the Facility. A copy of this WAP (final permitted version) will be kept on file at the Facility and will be made available for inspection.

The WAP documents the procedures the Facility will implement to safely transfer waste accepted at the Facility including the application of generator knowledge, inspection and physical testing and chemical analysis, when required, as identified below.

1. The Facility, when applicable, will apply generator knowledge including data developed under part 40 CFR 261 and existing published or documented data on the hazardous waste or on hazardous waste generated from similar processes (40 CFR 264.13(a)(2)).

2. Waste physical testing involves identifying and verifying the physical characteristics and composition of a waste by performing a physical analysis of a representative sample of the waste.

3. Waste chemical analysis involves identifying and performing various laboratory analysis of a representative sample of the waste.

1.3 Waste Analysis Plan Requirements

This WAP identifies and describes the following requirements:

1. Facility Description and Purpose of the WAP
2. Waste Profile Acceptance Procedure
3. Acceptable and Unacceptable Wastes

4. Waste Analysis Rationale
5. Waste Acceptance Procedures
6. Process Control Parameters
7. Sampling Methodology
8. Analytical Test Methods
9. Facility Quality Assurance and Quality Control
10. Recordkeeping and Reporting
11. Corrective Actions

2.0 FACILITY INFORMATION

2.1 Facility Location

The Facility is a commercial hazardous waste transfer facility located at 2264 E. 13th Street, Yuma, Arizona 85365, at Latitude 32º 42'18.20 N and Longitude 114 º 35' 42.26" W. A Site Location Map is included as Figure 1. The Facility intends to accept hazardous waste from off-site generators and will generate hazardous waste from the process of handling off-site wastes. Many of the characteristic and listed hazardous wastes from 40 CFR 261, Subparts C and D, are likely to be present in wastes handled at the Facility.

2.2 Facility Operations

The Facility will consolidate, bulk, repackage, and store a variety of hazardous waste for shipment to approved off-site reuse, treatment, and/or disposal facilities, fuel blenders or wastewater treatment plants. Wastes will typically be transported in tankers, roll-off bins and/or containers (e.g. 55-gallon drums, totes) and will be liquid, semisolid, and/or solid in nature. Generators, or customers, utilizing the Facility will include Large Quantity Generators (LQG), Small Quantity Generators (SQG) and Very Small Quantity Generators SQG (VSQG). Wastes will be received directly from generators or through third-party waste brokers under contract with hazardous waste generators.

2.3 Facility Description

The Facility consists of a 4.75-acre fenced lot with a main building, three concrete pads, and a water tank for fire control. The main building is a metal-frame structure with shipping and receiving loading docks. Also located in the main building is a laboratory, an office, and an emergency eye wash and shower area. The three concrete pads are located outside and are used as HWMUs to manage and store hazardous waste. A site plan of the Facility is provided in Figure 2.

When loading docks are otherwise occupied; trucks containing regulated waste are located on one of the concrete pads with containment located outside of the main building to contain drips and spills from the transport trailer. Types of acceptable hazardous waste in this area could include flammable and combustible materials (such as oils, waste fuels, etc.), contaminated soils and metal-containing filter cake, and other similar containerized materials.

2.4 Hazardous Waste Management Units

There are three designated HWMUs at the Facility; a concrete pad to the west of the main building

(HWMU1), a concrete pad located to the northwest of the main building (HWMU2), and a large concrete pad north of main building (HWMU3). The Facility is designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The Facility will carefully manage mixtures of hazardous wastes to prevent undesirable or uncontrolled reactions. During the waste acceptance process, the Facility will inspect incoming loads, and will review relevant data (such as profile sheets, LDRs, manifests, and laboratory results) to determine the hazard class of the waste. The Facility will manage the waste consistent with its identified hazard class for storage and/or transportation. Hazardous wastes classified as highly toxic chemicals will not be stored in excess of threshold quantities specified in 40 CFR 1910.119 Appendix A. Acceptable waste codes for each of the HWMUs are listed in Table 1.

Once the hazard characteristics of a waste are identified the waste material is transferred to the appropriate HWMU. The HWMUs have hazard class areas for ignitable, corrosive, toxic, and reactive wastes. These areas are separated by adequate aisle space, berms, catch basins or other physical barriers that prevent a reaction caused by mixing potentially incompatible wastes consistent with the Container Management Plan provided in Attachment D of the RCRA Part B application.

Ignitable or reactive RCRA hazardous waste are separated and protected from sources of ignition or reaction. Smoking at the facility is limited to specially designated areas and "No Smoking" signs are conspicuously placed throughout the Facility including, but not limited to entrances.

2.5 Employee Health and Safety Training

Sampling personnel (may include Managers, Supervisors, and Hazardous Waste Technicians I and II) will receive 40-hour hazardous waste operations (HAZWOPER) training consistent with 40 CFR 1910.120 that includes instruction on the use of sampling equipment, sample handling, selection of personnel protective equipment, evacuation procedures, container inspection and opening, fork lift operating, and Hazard Communication. HAZWOPER training for all sampling personnel will be kept current with annual 8-hour refresher training. Details on employee training are provided in Attachment H to the RCRA Part B application.

3.0 ACCEPTABLE AND UNACCEPTABLE WASTES

3.1 Facility Permitted/Acceptable Wastes

The waste streams accepted at the Facility will generally include characteristic wastes (D wastes) and/or listed wastes (F, P, and U waste), used oil, and universal waste (such as batteries, mercury-containing equipment, mercury-containing lamps/bulbs, and certain pesticides). Listed below are some examples of the types of waste received at the Facility:

1. Liquid paint, thinners, fuels, resins;
2. Alkaline sludge;
3. Alkaline liquid;
4. Mixed organic solvents;
5. Spent activated carbon;
6. Paint sludge, adhesives, resins;
7. Filter cake sludge;
8. Mercury batteries for mercury consolidation;
9. Halogenated organic solvents;
10. Soil and absorbent with organics;
11. Inorganic solid debris;
12. Nickel cadmium batteries;
13. Lead shot and wheel weights;
14. Automobile batteries;
15. Solid and liquid pesticides;
16. Rags and debris;
17. Acids with organics;
18. Mineral/organic acid liquid; and
19. Poison and flammable aerosols.

Individual waste codes are provided in Table 1.

Used oil is also received at the Facility.

3.2 Facility Non-Permitted/Unacceptable Wastes

Waste streams prohibited from acceptance at the Facility include:

1. Polychlorinated biphenyls of a type or level regulated by the TSCA (see 40 CFR Part 761), unless exempted, excluded or otherwise authorized pursuant to TSCA regulations (i.e. PCB waste in quantities greater than 500 gallons at concentrations greater than 50 PPM;

2. Mixed Waste (wastes that contain both a hazardous component regulated under Subtitle C of RCRA and a radioactive component consisting of source, special nuclear, or byproduct material regulated under the Atomic Energy Act);
3. DOT "Class 1" Explosives as defined in 49 CFR 173. 50 and Forbidden Explosives as defined in 49 CFR 173.54;
4. Biohazardous Medical Waste as defined by AAC R 18-13-1401;
5. K-Listed Industrial Specific wastes; and
6. F-Listed Dioxin-containing wastes (F020 – F023 and F026 – F028).
7. Lithium-ion battery wastes.

Generators and transporters will be notified of acceptable and unacceptable wastes at the Facility.

4.0 PRE-ACCEPTANCE WASTE PROFILE PROCEDURE

This section describes the rationale, information needs, and criteria for pre-acceptance of off-site wastes. This section also describes the processes, policies, and procedures for evaluating incoming waste shipments for acceptance and appropriate on-site management, referred to as the waste acceptance procedure. The waste acceptance procedure is designed to collect information needed to evaluate if a waste can be managed at the Facility. To have a waste stream accepted, the Generator must provide the Facility with written information about the waste stream.

The Facility uses information supplied by the Generator or the Generator's Agent to aid in its understanding of the waste it receives and manages. The Facility reviews and verifies the information provided on the waste profile to ensure its adequacy. The Facility is responsible for understanding the wastes to ensure compliance with its permit/regulations and to manage the wastes in a safe and environmentally protective manner.

4.1 Generator-Supplied Waste Profile Submittals

Prior to submitting a waste stream to the Facility for the first time, the Generator must submit a Waste Profile to the Facility. The Waste Profile includes a written description of the waste stream, including chemical and physical properties, prepared by the Generator or the Generator's designated agent knowledgeable in waste profiling procedures. The Waste Profile must include a description by the generator of their process knowledge of the waste and chemical composition. As necessary, an analytical report detailing relevant characteristics of a representative sample of the waste will be required. Process knowledge can include, but is not limited to, specific generator knowledge, and/or published or documented data on the hazardous waste, or on hazardous waste generated from similar processes. Additionally, a generator may also include the LDR Notification/Certification form for reference. The LDR Notification/Certification Form provides notice to the Facility from the generator on whether the waste stream is restricted under 40 CFR Part 268 and provides the basis for certification. The LDR must be included with the manifest on the initial shipment.

The Waste Profile Form contains specific information about the generator, the process generating the waste, waste characteristics, chemical composition, and waste volume and classification. Approved Facility personnel will compare the generator's supplemental information (if any) with the Waste Profile Form. The generator-completed Waste Profile Form must provide enough information for Facility personnel to make a preliminary determination and document with adequate specificity what waste the Facility will be managing and assurance that the Facility can manage the waste effectively, protectively, and in accordance with the conditions of the Facility's permit.

The Facility will, at all times, reserve the right to request additional information from the generator

prior to accepting a waste and/or at any time during the waste acceptance process. The profile form will include generator acknowledgment that Sydcol may require information in addition to what is submitted with the profile form in order to review and approve the profile.

An example waste profile form is provided in Appendix A. Waste information can be supplied in a different format if it is adequate to comply with 40 CFR 264.13, meets the Facility's reporting standards, and has been approved by the Facility Manager.

4.2 Waste Profile Approval Criteria

The Waste Profile submitted by the generator is first reviewed for completeness. Supplemental information could be required by the Facility when additional information about the waste is needed to properly manage and dispose of the waste so that proper storage and disposal options are considered for the waste stream. Facility personnel will evaluate the Waste Profile Form and any attachments to determine if the waste can be accepted at the Facility per the Facility's permit conditions.

A waste stream can be determined to be unacceptable during the pre-submittal stage based on information on the Waste Profile Form. Additional information will be requested if the data is determined to be inconclusive in one or more areas. If the waste stream is not approved for acceptance, Facility personnel will inform the generator that the waste is not acceptable at the Facility.

4.3 Land Disposal Restrictions

LDRs prescribe how most RCRA hazardous wastes must be treated before they can be disposed of in or on the land. The Facility will accept, store, generate, and transfer materials subject to 40 CFR Part 268 requirements. No treatment or disposal of waste occurs at the Facility. The facility will only bulk or combine waste with compatible properties. While some changes to characteristic listings may occur, the waste will maintain the codes of the original material.

The generator of a hazardous waste is responsible for determining the applicable LDRs at the point of generation. The generator is also responsible for notifying the Facility of the restricted status of the waste by providing the Facility with an LDR Notification/Certification Form. This notification and/or certification must be provided prior to acceptance and management of the waste shipment.

During the waste profile process, the Facility will perform a review of the LDR status of the waste. This status review, at the profile stage, will be performed independent of the generator's LDR Notification/Certification Form. If additional information is required to determine the LDR management requirements, the generator will be required to provide that information and/or to

provide a sample for analysis prior to the management of waste.

The Facility will provide the required LDR notifications when hazardous waste is subsequently shipped to a licensed treatment, storage, or disposal facility. This does not apply when the Facility sends waste material off-site as recyclable material.

A sample LDR Notification/Certification Form is shown in Appendix B. This is an example of a typical Notification/Certification Form, however the information can be supplied in a different format if it is meets the Facility's reporting standards.

4.4 Waste Profile Recertification

The Facility will assign a waste profile number to each approved waste stream for the generator. The waste profile number is tied to the Waste Profile Form. The generator will be required to identify the waste stream utilizing the waste profile number on future shipments.

The waste profile approval is repeated when determined necessary to ensure that it is accurate, up to date, and representative of the waste over time. Generators are required to inform the Facility of significant changes in the characteristics of and/or the process generating their waste streams. They agree to do so by signing the certification statement in the Waste Profile Form. The Waste Profile Form is updated whenever a change in waste stream characteristics is indicated by the generator or whenever results of the waste fingerprint analyses performed by or on behalf of the Facility are not consistent with the original Waste Profile Form.

If the waste stream exceeds the Facility's non-conformance criteria, the Facility will not accept the waste under the existing Waste Profile. The Facility will require the generator to submit a new Waste Profile Form to resolve the discrepancy. Discrepancies involving significant differences in quantity or type must be resolved within 15 days. Wastes rejected due to a discrepancy will be returned to the generator or forwarded to an acceptable alternate facility within 60 days.

The waste will be sent back to the generator or until a new waste profile is approved. Rejected wastes will not be maintained at the Facility for longer than 60 days after the discrepancy is resolved. Upon Facility approval, the Waste Profile will be assigned a new unique waste profile number to be associated with the waste stream.

Page intentionally blank.

5.0 WASTE ANALYSIS PROCEDURES

This section describes the processes, policies, and procedures for evaluating incoming waste shipments once it arrives at the Facility. The waste acceptance process was developed and is implemented to verify that a waste shipment conforms to the description on the pre-approved Waste Profile Form and the manifest that accompanies the waste. In addition to comparing the waste shipment to the waste profile form, the acceptance procedure will be used to aid in properly segregating the waste.

Waste acceptance is performed in the step-by-step procedure outlined below that includes making qualitative observations (such as visual identification of color, number of phases, etc.), testing with field test kits and screening instruments, and by laboratory instrumental analysis. The specific information needed for waste acceptance depends on the variability of the waste, the accuracy and precision needed to comply with the permit requirements, and the stated objectives of the waste acceptance.

The two key objectives of all waste acceptance sampling and testing are to:

1. Ensure that the parameters being tested (e.g. pH) meet permit requirements and fall within acceptable limits for effective management and disposal; and,
2. Verify that the incoming shipment matches the manifest and is the same waste that was approved during pre-acceptance.

Until a waste has been accepted by the Facility, the waste remains the property of the generator. Should the waste have to be sent back to the generator or an alternate facility, it will be the generator's responsibility to provide and/or authorize a new profile and proper shipping manifest.

5.1 Fingerprint Analysis

The Facility at its discretion, may utilize fingerprint analysis to verify that the waste received matches the description on the manifest, and that the waste matches the waste type that the Facility has agreed to accept. When the Facility already knows the detailed chemical and physical properties of a waste, appropriate target or split check parameters can be selected to verify that each waste arriving at the Facility matches its corresponding profile.

Fingerprint analysis is generally conducted for parameters based on the waste stream that may include color, specific gravity, ignitability screen (flash), presence of more than one phase, pH, halogen content, cyanide content, and/or percent solids/liquids. Used oil waste is fingerprinted for halogen content. The fingerprint analysis will give information that can be used to help verify that the waste matches the expected characteristics for that waste.

Visual inspection of the waste consistent with ASTM D4979 will be performed as an initial screening procedure and for comparison with the waste description presented on the Waste Profile Form and/or manifest. Visual screening of waste can be used to help verify that the waste received and/or generated meets the acceptance criteria and matches the expected characteristics for that waste. Visual screening will include color, physical state, number of phases, strong odor, and percent solid and free liquid range.

Table 2 lists various characteristic information that may be identified on the waste profile for acceptance at the Facility. Information is divided into a Core analysis and Supplemental analysis. The Core analysis will be performed on wastes that are selected for analysis. Not all core analysis parameters are required for each waste. The Core analysis parameters are determined based on the profiled waste stream. The Facility will also perform the Core analysis as described per the Acceptance Level as described in 6.0 Waste Acceptance Procedures.

Supplemental analysis is required by the Facility when applicable to the waste stream identified during the Waste Profile and Acceptance stages. The supplemental analysis is also presented in Table 2.

In addition to the analyses shown in Table 2, several other parameters will also be studied in the waste profile process to determine the best management techniques for the waste streams. The parameters are determined by the specific characteristics of the various waste streams. For example, the sulfides screen shows whether the waste has a potential to produce hydrogen sulfide. If the analysis is positive, the waste is considered non-conforming and the Facility will contact the generator to discuss how to proceed. The same procedure is followed for non-conforming water reactive, oxidizer and cyanide-containing waste.

Waste is generally considered acceptable if analysis data show that the waste can be effectively managed at the Facility. Acceptance or refusal of each waste stream is based on the waste profile analytical results and the capabilities of the Facility.

5.2 Lab Packs & Other Waste Not Requiring Sampling

There are certain hazardous wastes streams that will not (or cannot) be sampled for analysis. These wastes are either not amenable for analysis, there are safety concerns for sampling/analyzing the waste, or the conformance between the waste and waste profile can be adequately determined by visual inspection. It is not possible to determine all cases in advance. Some wastes, such as those listed below, are typically not sampled.

- Lab packs

- Aerosol containers and other pressurized gas containers not defined as compressed gases in 49 CFR 173.301
- Some hazardous debris (e.g., contaminated PPE, contaminated glassware)
- Off-specification, outdated, or contaminated commercial products
- Chemical-containing equipment removed from service (e.g., cathode ray tubes, batteries)
- Containers labeled with contents

Inner containers in lab packs are not sampled because of safety concerns and because of the difficulties involved in sampling the many smaller containers, ampoules, and vials over packed within the larger shipping container. Aerosol containers, other pressurized gas containers as defined above, and some hazardous waste debris are not sampled as taking a representative sample of such waste (e.g., spray paint or contaminated concrete chunks and rebar) is usually not practical.

Off-specification, outdated, or contaminated commercial products are not sampled because there is ample information on these products (e.g. Safety Data Sheets). Chemical-containing equipment removed from service (such as cathode ray tubes and batteries) is not sampled because taking a representative sample of such waste is usually not practical.

For incoming waste, conformance is determined through visual inspection of the waste and comparisons to the waste profile's physical description. For lab packs, conformance is based upon review of the accompanying inventories supplied with the manifest.

For cases not described above, justification for not sampling the waste will be included in the operating record for the waste.

5.3 Recording Acceptance Fingerprint Analytical Results

The acceptance analytical results are recorded in the Facility operating record by generator name, the unique waste profile number, and/or sample identification number. These results take the form of computer files, electronic images, and/or paper copies. The operating record will consist of a filing system organized by generator name and waste profile, with information provided by the generator in support of the profile maintained with the analytical results of fingerprint analytical results. The retention period for records is for a minimum of three years or as otherwise prescribed in 40 CFR 264.73.

Page intentionally blank.

6.0 WASTE ACCEPTANCE PROCEDURES

Waste acceptance procedures will be conducted on two levels of analysis; an initial Level I analysis and a more detailed Level II analysis, if necessary.

6.1 Level I Analysis

Level I analysis involves incoming load inspection and screening. When a waste shipment arrives at the Facility, the transporter is required to provide the manifest that describes each waste stream, and the appropriate LDR Notification/Certification form. If a waste shipment arrives at the Facility without an approved waste profile number, the shipment will be rejected unless profile information is provided by the generator and the waste is approved by the Facility. Upon passing the load inspection as described in 6.1.1, the waste will either be accepted at the Facility, rejected, and/or quarantined for further analysis.

6.1.1 Load Inspection

The incoming load will be verified. Incoming load verification begins by reconciling the number of containers and/or quantity of waste against the manifest.

The waste shipment is inspected by Facility personnel. During the inspection, the following information is verified:

1. Whether the quantity of waste received matches the manifest.
2. Irregularities in the shipment (such as leaking or damaged containers).

Leaking or damaged containers will be secured and repackaged unless deemed unsafe and/or not allowed by regulations. The container will be secured to prevent further releases into the environment and quarantined. The generator will be notified when deemed necessary by the Facility. Further handling procedures of the shipment will be determined on an individual basis by the Facility Manager.

6.1.2 Representative Sampling

Several manifests are commonly delivered on a single truck. Representative grab samples of bulk and containerized waste, up to ten percent (10%) of the eligible containers of each load subject to sampling, will be collected and analyzed for a set of given parameters (see Table 3).

To be representative, a sample will be collected and handled in a way to preserve the waste's physical form and chemical composition and prevents contamination. Based on the waste stream, the collected sample will be screened for some or all of the following

parameters:

1. Visual Inspection.
2. pH (Liquids only).
3. Sulfide Screen (sulfur-based wastes with a pH at or greater than 5).
4. Cyanide Screen (ammonia/nitrogen-based wastes with a pH at or greater than 5).
5. PCB Screen (to be performed on oils and PCB-contaminated soils).
6. Oxidizer Screen (to be performed on materials suspected but not identified as an oxidizer on the profile).

In certain situations, the Facility will conduct additional confirmation analyses. Situations where additional confirmation analyses might be performed would be for waste streams for disposal where the metal concentration ranges affect the disposal methodology and cost.

The results of the waste acceptance analysis are recorded and kept on file as part of the Facility operating record. The results of the inspection are recorded if there is a non-conformance or deviation between the waste delivered and the waste profile that results in Level II analysis.

The Facility Manager decides whether supplemental analyses are required for a waste based on the results of the routine acceptance fingerprint analyses, the results of the waste profile evaluation, and the experience of the laboratory manager or designee. Further analysis (Level II) will be required if the results indicate the unexpected presence or absence of a screening parameter or other reasons that warrant such testing.

6.2 Level II Analysis

Failure of Level I analysis automatically initiates Level II analysis. Level II analysis begins with a qualitative review of the waste by the Facility Manager. Level II analysis can result in the acceptance of the waste, analytical testing or rejection.

Level II analysis may also be initiated at the discretion of the Facility if the Level I analysis indicates a discrepancy with the description of the waste on the profile. If a Supervisor or Technician finds an apparent discrepancy between the results of the Level I analysis and the description of the waste on the profile, the Facility Manager will be requested to review the results of Level I. If the Facility Manager determines the waste conforms to the profile, the waste will be accepted. Waste that does not pass the Facility Manager's qualitative review will be moved to an appropriate storage area separate from other stored wastes while a Level II analysis is performed.

The Facility Manager may perform any or all of the following actions:

1. Submit a sample for in-house analysis;
2. Submit a sample to a third-party certified laboratory for confirmation;
3. Contact the generator; and/or
4. Reject the waste.

The generator will be contacted if determined by the Facility Manager that the quarantined waste fails Level II analysis. Based on a review by the Facility Manager, some or all the following options will be provided to the generator:

1) Generator submits a new waste profile for the waste.
2) Ship back to the generator.
3) Ship to another facility.

The Facility on-site laboratory has the capability to perform the fingerprint analysis in Table 4. Screening methods will be published methods or industry-standard practices as referenced in Table 4. Industry-standard methods that are not published are detailed in Appendix C.

The capabilities of the Facility's on-site laboratory could increase in the future to include supplemental analysis. The Facility Manager will determine if supplemental analysis will be required. Supplemental analysis that cannot be provided by the Facility laboratory will be performed by an off-site third-party laboratory.

The type of analysis required for waste acceptance is generally the same as the waste profile analysis requirements. However, the waste acceptance analysis does not duplicate the waste profile analyses. The former is generally less extensive and less time consuming than the latter, and the intent is to verify that the basic characteristics of a waste shipment match those expected based upon waste profile data. The major components of the waste shipment can usually be identified and matched to expected characteristics by qualitative analysis. Only when unexpected results are identified in the qualitative analysis are more extensive analyses of the waste shipment performed. These more extensive analyses provide data for discrepancy notation or resolution.

If the waste characterization analyses and/or discussions with the generator indicate that the waste shipment is not the same waste stream as originally pre-screened, the waste is considered non-conforming and the Facility Manager will contact the generator to resolve the non-conformance.

6.3 Special Procedures for After Hour Deliveries

The Facility receives wastes during normal business hours. If there is an occasion when wastes are delivered during off business hours (after 5 pm, weekends, and holidays) the following provisions will be implemented.

1. Arrangements will be made in advance with the generator/transporter Facility to have Facility personnel, including a Hazardous Waste Technician and Chemist/Lab Technician on call to receive the waste after hours and conduct required analysis as detailed in this section.
2. In those cases where the analysis is not or cannot be completed at the time the waste arrives at the Facility, the waste will remain on the transport vehicle until the analysis can be completed.

7.0 DISCREPANCY POLICY

This section described the policies and procedures that the Facility will use when there is a discrepancy between the waste designated on the manifest or waste profile and the waste received at the Facility.

7.1 Discrepancy Criteria

Whether a discrepancy in the waste is acceptable at the Facility is based on the following criteria:

1. The level of conformance between the initial waste profile and the Level I analysis of the incoming shipment.
2. The level of conformance between the manifest and Level I analysis of the incoming shipment.
3. Whether the waste is allowed pursuant to the Facility permitted waste code
4. Whether the waste stream is not allowed (i.e.; PCB levels/quantities, radioactive or infectious waste, etc.).

Manifest discrepancies are differences between the quantity and type of hazardous waste designated on the manifest, and the quantity and type of waste received at the Facility including the following:

1. A variation of 10 percent by volume for bulk shipments;
2. Any variation in piece count for containerized shipments;
3. Obvious difference in waste type per 40 CFR §264.72(a)(l).

The Facility will attempt to reconcile the discrepancy with the generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the Facility will submit a report to the ADEQ Hazardous Waste Unit describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

When waste is received, except for waste identified below at "Lab Packs and Other Wastes Not Requiring Sampling," it is screened per the WAP parameters in Table 2 to verify that the shipment matches the waste profile.

7.2 Non-Conforming Waste Procedure

If a waste type does not generally match the profile, it is considered to be non-conforming and requires further investigation and/or analyses to resolve the discrepancy. (For example, slight variations which do not significantly alter the waste type or handling methods).

The non-conformance area will be a pre-designated quarantine area within one of the HWMUs

suitable for short-term storage of a variety of waste. To be considered suitable, the quarantine area will be maintained separate from other waste containers in storage and have posted signage designating the containers are under quarantine. Quarantined wastes in HWMU1 will be separated on secondary containment pallets to segregate incompatible wastes that has yet to be accepted at the Facility.

A waste may be considered non-conforming for any of the following reasons:

1. Improper waste coding;
2. Physical discrepancies (discrepancies are considered noticeable and identifiable variations. All questionable discrepancies, regardless of size or nature, should be directed to Level II for the Facility Manager or its designee to determine if the discrepancy represents a non-conformance); and/or
3. A variation resulting in the change of a regulatory classification under the permit.

If a non-conformance is identified, the waste is quarantined in a pre-designated area, the generator and/or transporter is contacted, and further actions are discussed. The Facility will either require the profile to be updated, require the generator to approve a one-time discrepancy on the existing Waste Profile, or a new profile will be developed. If the waste is amenable to management at the Facility, the discrepancy is attempted to be resolved. If the waste is not amenable for management at the Facility or if the discrepancy cannot be resolved, the waste is rejected. Tests and methods used to determine if a discrepancy exists are contained in Table 3.

8.0 REJECTION POLICY

This section describes the policies and procedures that the Facility will use for the rejection of waste delivered to the Facility. The Rejection policy is designed to ensure that applicable federal and state requirements for rejections are followed as described in 40 CFR 264.72. The Facility will reserve the right to reject waste at the discretion of the Facility Manager or designee.

Once a waste stream has been identified by the Facility and rejected the following procedures will be followed:

1. The Facility will notify the generator the waste is rejected.
2. The generator will be responsible for arranging the removal of the rejected shipment.
3. While the shipment is waiting to be returned to the generator or delivered to an alternate facility, the Facility will maintain the waste in a secured manner.
4. The Facility will send the rejected waste off-site within 60 days of the rejection in accordance with applicable manifest requirements.

Page intentionally blank.

9.0 SAMPLING METHODOLOGY

This section describes how the Facility determines the appropriate sampling method for waste characterization. Samples of waste streams designated for laboratory analysis are collected by Facility personnel in accordance with sample collection protocols designated in the EPA SW-846 waste sampling guidance or other industry-standard sampling protocols, as appropriate for specific waste types.

The Facility personnel collecting the sample must be aware that the waste can be a strong sensitizer, flammable, corrosive, or toxic. The background information on the manifest and Waste Profile Form is helpful in deciding the level of sampling safety precautions to be observed and selecting the proper personal protective equipment.

Sampling personnel will receive sampling methodology training in accordance with EPA SW-846 sampling guidance. The Laboratory Manager or designee will determine and implement the sampling method in the case an EPA sampling method does not exist for a specific material/shipment.

9.1 Sampling Rationale

Sampling rationale will need to address the types of samples needed (e.g. authoritative or random sampling: grab or composite sampling); selection of sampling locations; number of samples; and sampling frequency.

Authoritative sampling is sufficient in cases where historical data, generator, and process information is available to accurately assess the chemical and physical properties of a waste. Sample locations are selected based on knowledge of waste properties (e.g. homogeneous process steams) and level of uniformity or waste distribution. The validity of authoritative sampling is dependent upon the accuracy of the information used.

Random sampling strategies are more commonly utilized due to the difficulty in determining the exact chemical and physical properties of most hazardous waste streams (e.g. wastes streams of unknown and/or variable concentrations). The Facility will select either the simple or the stratified random sampling technique. Simple random sampling is used to collect representative samples of wastes that are heterogeneous through the entire waste stream. Stratified random sample is used to collect representative samples from waste streams that are known to have areas of non-uniform properties and/or hot spots.

A Grab sample is a single sample from a location within a volume of waste at a distinct point in time. Grab samples will be collected if the integrity of the sample may be affected by the physical mixing of samples during the compositing process and when determining compliance with the

LDR requirement.

A Composite sample is several individual samples (aliquots) collected from a volume of waste that are combined into a single sample for analysis. A composite sample may be used in cases at the Facility where a waste stream is considered to be homogenous with little concentration variations.

9.2 Sampling Equipment

The physical and chemical characteristics of waste must be considered when determining the most appropriate type of sampling equipment to use for a given waste. Table 3 provides examples of the types of sampling equipment that will be utilized at the Facility.

9.3 Maintaining and Decontaminating Sampling Equipment

Sampling personnel collecting waste samples will wear a pair of surgical latex gloves and/or other appropriate PPE. Reusable sampling equipment will be decontaminated after a sampling event. When needed to prevent cross-contamination, sampling equipment that comes in contact with waste will be decontaminated before use.

The decontamination procedure includes removal of loose debris and soil from the sampling equipment. Following removal of loose debris and soil the following steps are taken:

1) Reusable sampling equipment will be disassembled and washed thoroughly with a phosphate-free laboratory grade detergent after a sampling event.
2) The equipment will then by further decontaminated with a distilled water rinse.
3) If sampling for metals, the equipment will then be decontaminated using a 10% nitric acid rinse followed by a second rinse with clean distilled water.
4) If sampling for organics, the equipment is decontaminated with hexane or methanol and decontaminated with a distilled water rinse. (Typically, methanol is used due to lower hazards risk)
5) The equipment is then reassembled and allowed to air dry on a decontaminated drying rack or other similar device.

9.4 Sample Collection

A sufficient and representative sample of the waste material will be collected. Sample volume is subject to the request of the on-site laboratory and/or a third-party laboratory. Sample containers are labeled to identify their source, date and time of sampling, and initials of sampling personnel. Samples are submitted to the on-site laboratory and/or third-party laboratory for processing. Samples taken from hazardous waste shipments for fingerprint analysis are collected by the sampling personnel and delivered to the on-site laboratory. The on-site laboratory personnel will

properly preserve the sample according to the appropriate laboratory methodology in 10.2. Samples held for further analysis and/or submitted to an independent third-party laboratory will be collected by Laboratory personnel or designee and will be preserved as discussed in 10.2 Laboratory Sample Preservation.

9.5 Chain-of-Custody

All samples will be assigned a unique identifier. Samples collected by the Facility personnel will identify the sample containers with the following information:

1) Last four digits of Manifest # e.g. M1234
2) Line # e.g. L01
3) Container # e.g. C123

Samples will be labeled with the date, time and initials of the sampling personnel.

For samples submitted to a third-party laboratory, laboratory personnel or their designee will collect a sample of the waste. To document sample possession from the time of collection until the sample has been received by third party laboratory, the laboratory personnel or their designee will complete the chain-of-custody information on the laboratory-provided chain-of-custody form. Proper custody of the samples will be documented, and changes in sample custody will be documented. To simplify management of the sample chain-of-custody, only required personnel should handle the waste samples. While collecting the sample, it is the responsibility of the Facility for the care and custody of the samples until they are transferred. This chain-of-custody procedure will be followed during waste sampling activities.

Each record will contain the following information: sample identification, signature of the sampler, date and time of the collection, sample type, signature of persons involved in the chain of possession, and inclusive dates and time of possession.

Page intentionally blank.

10.0 LABORATORY TEST METHODS AND PROCEDURES

This section describes how the Facility selects the laboratory analysis parameters, test methods, laboratory equipment calibration, sample preservation, sample receiving procedure, and chain-of-custody protocol. The Facility's QA program and QC procedures are designed to ensure laboratory data are scientifically valid, defensible, and of known precision and accuracy (except for test strips and visual observations). This section also identifies the data records the Facility will maintain, how long, where, and in what format each record type will be maintained.

10.1 Laboratory Test Methods

The on-site laboratory will perform fingerprint analysis. The on-site laboratory will follow EPA guidelines where protocol for field screening has been established per methods published by ASTM or listed in the SW-846 Compendium (as updated). Table 4 provides the list of screening methods and the associated method number utilized by the on-site laboratory.

The Facility will subcontract a third-party laboratory to provide analytical testing. Any third-party laboratory must be certified by ADHS for the methods used by the laboratory.

Third-party laboratory test methods shall be in conformance with the EPA manual Test Methods for Evaluating Solid Wastes SW-846 (as updated), Standard Methods/or the Examination of Water and Wastewater and/or ASTM. Table 5 provides the list of screening methods utilized by the third-party laboratory.

10.2 Laboratory Sample Preservation

All samples will be preserved and held according to current SW-846 or other methodological protocols.

10.3 Fingerprint Analysis QA/QC

The goal of a QA/QC program is to provide accurate and precise data on the physical and chemical properties of waste so that the wastes are handled safely. While Fingerprint analysis does not require a formal QA/QC manual, QA will be accomplished by ensuring that:

1. The wastes are properly screened;
2. Wastes that do not meet the Facility criteria are not accepted;
3. Analytical equipment is properly calibrated consistent with manufacturer recommendations; and
4. Personnel involved in sample collection and sample screening are trained in proper

procedures.

The Facility provides initial and recurrent training to employees to insure samples are analyzed, stored, and disposed properly and safely. Laboratory personnel are knowledgeable of analytical procedures and receive on the job training for the specific analytical procedures used at the Facility. The employee's training effectiveness is documented annually. The Facility laboratory personnel have been trained to perform the procedures outlined under the Fingerprint Analysis.

10.4 Sample Receiving Procedure

Samples collected for third party analysis will be maintained according to EPA and ADEQ approved chain-of-custody procedures. This means those samples can be traced from the time the samples are obtained by the Facility until results are reported.

Samples will be collected at the Facility and delivered to the third-party laboratory. It is the responsibility of the Facility to determine the analyses to be performed on the samples and that pertinent information relative to the sample is recorded. The third-party laboratory documents the receipt of the sample is consistent with the requirements.

It is the third-party laboratory's responsibility to document the sample containers are individually labeled and whether the paperwork matches the contents of the bottle (or package). In addition, the third-party laboratory will note whether all the dates and times are consistent, and whether or not the sample description on the paperwork matches the description of the sample containers.

Fingerprint samples at the Facility and samples received by the third-party laboratory will be logged in before work is performed on the samples. The purpose of the log-in procedures is to ensure that the laboratory has a means where samples can be tracked for sequence of events during a period. In handling projects in this manner, the Facility laboratory and third-party laboratory provides a consistent and documented sequence of events.

10.5 Maintenance of Laboratory Custody

On-site samples will be securely maintained by Laboratory personnel or designee. Samples obtained for third-party laboratory will be maintained consistent with the chain-of-custody requirements from the beginning of sampling to the final report. It is the responsibility of the third-party laboratory to ensure that: a) samples are kept in a minimum-access facility, and b) they are within their possession during the period they are being analyzed.

Samples received for analysis by the Facility will be stored consistent with method-specific sample handling requirements. No in-house samples will be disposed without authorization from the

Facility Manager. The third-party laboratory will maintain the samples in its laboratories for the specified length of time as required by ADHS.

The Facility will conduct, or subcontract to the third-party laboratory, analyses in general accordance with the U.S. EPA SW-856 methodology or by an equivalent ASTM method. These procedures incorporate stringent quality control requirements and describe accuracy, calibration criteria, internal standard, and method-detection limits.

10.6 Laboratory Analysis Evaluation

The Facility and/or third-party laboratory will complete check-in procedures as presented above. The on-site laboratory will perform fingerprint analyses and compare the results to the waste profile received from the generator. When the Facility deems a certified-laboratory analysis is required to perform waste characterization for permit compliance, the Facility will utilize the services of an ADHS-certified laboratory. Analytical results are retained by the Facility for three years as required by ADEQ.

10.7 Third-Party Laboratory Data Evaluation

Analytical data, if available, are evaluated as part of the screening and acceptance procedures for waste shipments. Data are compared to screening tests of previous shipments of the waste stream, other samples of the same shipment, and waste characterization data. Discrepancies that cannot be attributed to normal sampling or laboratory variation are investigated further.

The Facility Manager will review the laboratory report, and if necessary, revise at the Generator's approval, the waste profile and/or manifest to make it consistent with the certified results. Analytical results are retained by the Facility for three years.

Page intentionally blank.

11.0 WASTE COMPATIBILITY

To prevent the possibility of mixing incompatible hazardous wastes, waste being considered for acceptance at the Facility is subject to a compatibility evaluation. This evaluation is qualitative and is based on data gathered in the waste profile and waste acceptance processes. The data is used to classify wastes into specific reactivity groups that are used as indicators of potential incompatibility.

The Facility will carefully manage mixtures of hazardous wastes to prevent undesirable or uncontrolled reactions by following the procedures outlined below:

1. During the waste acceptance process, the Facility inspects incoming loads and reviews relevant data from laboratory results and manifests (discussed in Section 6.0) to determine if the waste is ignitable or reactive. Based on the test results, the Facility manages the waste consistent with its hazard class for storage or disposal.

2. If an incompatibility issue is identified, additional testing will be required. Compatibility testing generally entails mixing a small volume of one substance with another and observing the mixture for heat, gas generation, or polymerization reactions. Facility personnel will evaluate the test results to determine the nature of the incompatibility. Field and/or laboratory compatibility testing must be documented in the Facility operating record.

3. The hazard characteristics of a bulked waste are verified and stored in appropriate segregation areas. The Facility has designated segregation areas for each hazard class areas for toxics, ignitable, corrosive, and reactive wastes. These areas are to be kept separated by adequate aisle space, berms, racking or other physical barriers that prevent a reaction caused by mixing potentially incompatible wastes.

4. Ignitable or reactive RCRA hazardous waste are separated and protected from sources of ignition or reaction. Smoking at the Facility will be limited to specially designated areas, and "No Smoking" signs are conspicuously placed where ignitable and reactive hazardous wastes are stored. Ignitable or reactive waste containers will be stored at least 50 feet from the property line.

5. Waste containers will be decontaminated before reuse for another potentially incompatible waste, unless a compatibility evaluation of the two or more wastes indicates that the reuse will not create adverse and/or uncontrollable reactions.

Page intentionally blank.

TABLES

Table 1
AA Sydcol Hazardous Wastes

Waste type	RCRA Waste Codes	HMWUs	Estimated Annual Quantity (tons)
Ignitables	D001	1, 2, 3	30,000
Corrosives	D002	1, 2, 3	20,000
Reactives	D003	1, 2, 3	200
Toxicity: Heavy metals	D004-011	1, 2, 3	100
Toxicity: pesticides/herbicides	D012-017, 020, 031	1, 2, 3	100
Toxicity: Volatile organics	D018-019, 021-022, 028-029, 035, 039-040, 043	1, 2, 3	32,500
Toxicity: Semi-volatile organics	D022-027, 032-034, 036-038, 041-042,	1, 2, 3	200
2,4-dinitrotoluene, nitrobenzene	D030, D036	1, 2, 3	2
Halogenated compounds: degreasing	F001	1, 2, 3	4,000
Halogenated compounds: solvents	F002	1, 2, 3	4,000
non-Halogenated compounds solvents	F003-005	1, 2, 3	8,000
Listed electroplating wastes	F006-009	1, 2, 3	11,000
Listed metal finishing wastes	F010-012, 019	1, 2, 3	2,500
Chlorinated aliphatic hydrocarbons	F024-026	1, 2, 3	10
Listed wood-preserving wastes	F032, F034-035	1, 2, 3	10
Refinery WW treatment sludges	F037-038	1, 2, 3	10
Hazardous leachates	F039	1, 2, 3	10
P-listed commercial chemicals	P001-P205	1, 2, 3	100
Commercial grade acetone	U002	1, 2, 3	100
Commercial grade benzene	U019	1, 2, 3	100
Commercial grade 1-butanol	U031	1, 2, 3	20
Commercial grade methanol	U154	1, 2, 3	100
Commercial grade methyl-ethyl ketone	U159	1, 2, 3	100
other U-listed commercial chemicals	U001, 003-018, 020-030, 032-153, 154-158, 160-411	1, 2, 3	200
Total			113,362

Table 2
Waste Analyses Test Applicability

	Tests	Profile[1]	Initial[2]	Level I[11]	Level II[12]
1	**Visual Observation of Physical Characteristics**				
	Color	C	C	C	C
	Physical State	C	C	C	C
	Strong Odor	C	C	C	C
	Percent Solids /Liquid	C	C	C	C
	Phases (Layers)[6]	C	C	C	C
	Presence of free liquids[4]	C	C	C	C
2	**Level 1 Screening or Level 2 Analytical Testing**				
	pH Screen[6]	C	C	C[5]	C[5]
	Sulfide Screen[3]	C	C	C[5]	C[5]
	Cyanide Screen[3]	C	C	C[5]	C[5]
	PCB Screen[7]	C	C	C[5]	C[5]
	Oxidizer Screen[8]	C	C	C[5]	C[5]
	Total Halogens[9]	C	C	C[5]	C[5]
3	**Analytical Testing**				
	Specific Gravity[6]	C	S		S
`	Water Reactivity[13]	C	S		S
	Ignitability (Flash)[6]	C	S		S
	Halogenated Organic	S	S		S
	Heavy Metals	S	S		S
	Fuel Testing[10]	S	S		S
	OVA Analysis	S	S		S

Notes:

C Core Analysis - required by and/or performed at the Facility per Level 1. Not all core analysis parameters are required for each waste. The core analysis parameters are determined based on the profiled waste stream.

S Supplemental Analysis - performed at the discretion of the Laboratory Manager, Facility Manager, end disposal location, and/or as indicated by the waste stream. This analysis is performed in the Facility on-site laboratory and/or at an off-site third party laboratory. Not all supplemental analysis is required for each waste stream.

1 Generator knowledge is allowed in lieu of laboratory analysis to characterize a generator's waste.

2 See Section 5.2 on Lab Packs & Other Waste Not Requiring Sampling.

3 For the following wastes with a pH at or greater than 5: Sulfide screens for Sulfur-based waste and cyanide screens for ammonia/nitrogen-based wastes.

4 Applies to wastes without free liquids that are to be stored in containers outside of secondary containment.

5 Screens performed at Level I per WAP. (i.e. 10% of load)

6 Test performed on Liquids Only.

7 PCB Screen to be performed on oils and contaminated soils.

8 Oxidizer Screen to be performed on material suspected of being an oxidizer, but is not identified as an oxidizer on the profile.

9 Fuel Testing for BTU & % Chlorine.

10 Waste oil testing.

11 Level 1 is visual confirmation of waste received to waste profile and manifest and may include screening.

12 Level II is visual confirmation by Facility Manager and can include sampling and testing, and/or discussion with the generator.

13 Water reactivity tests on suspected waste but is not identified as water reactive on the profile.

Table 3
Sampling Equipment

Sample Type	Sampling Method(s)	Sampling Equipment
Free-flowing liquids and slurries, used oil	ASTMD5495, D6063	Coliwasa, glass sampling tube, plastic sampling tube, dipper, bomb, weighted bottle and other approved equipment.
Wet Solids/Sludges Sampling and Extremely Viscous Liquids	ASTM D5451, D6232	Trier, split spoon coring sampler, glass tube, plastic sampling tube and other approved equipment.
Dry Flowable Solids and Crushed or Powdered Materials	ASTM D5451, D6063	Thief, grain sampler, trier, scoop, shovel, glass sampling tube, plastic sampling tube and other approved equipment.
Solids and Soil or Rock-Like Materials	ASTM D5451, D6063	Large trier, split spoon coring sampler, grain sampler, trier, shovel, scoop and other approved equipment.

Note: Reference Section 5.2 regarding waste that does not require sampling.

Table 4
On-site Laboratory Fingerprint Test Methods

Analyte	Screening Test Method	Equipment
Cyanide Screen	Reactive cyanide screen[1]	Cyantesmo paper
PCB Screen	SW-856 Methods 9078/79	Colorometric test kit; PCB/Cl test kit
pH	SW-846 Method 9041A; EPA 150.1	Wide-range pH paper.
Specific Gravity	ASTM D5057	Balance scale, weighing bottle
Oxidizer Screen	KI paper[1]	Potassium iodine starch paper
Sulfide Screen	Reactive sulfide screen[1]	Lead acetate paper
Ignitability Screen	Ignitability screen[1]	Cup and match
Compatibility	Bucket test[1]	5-gallon bucket, thermometer
Free Liquids	SW-846 Method 9095B	Paint filter apparatus
Total Halogens	SW-846 Method 9077	Chlor-D-Tect sampling kits
Visual Screening	Physical Description[1]	Transparent containers

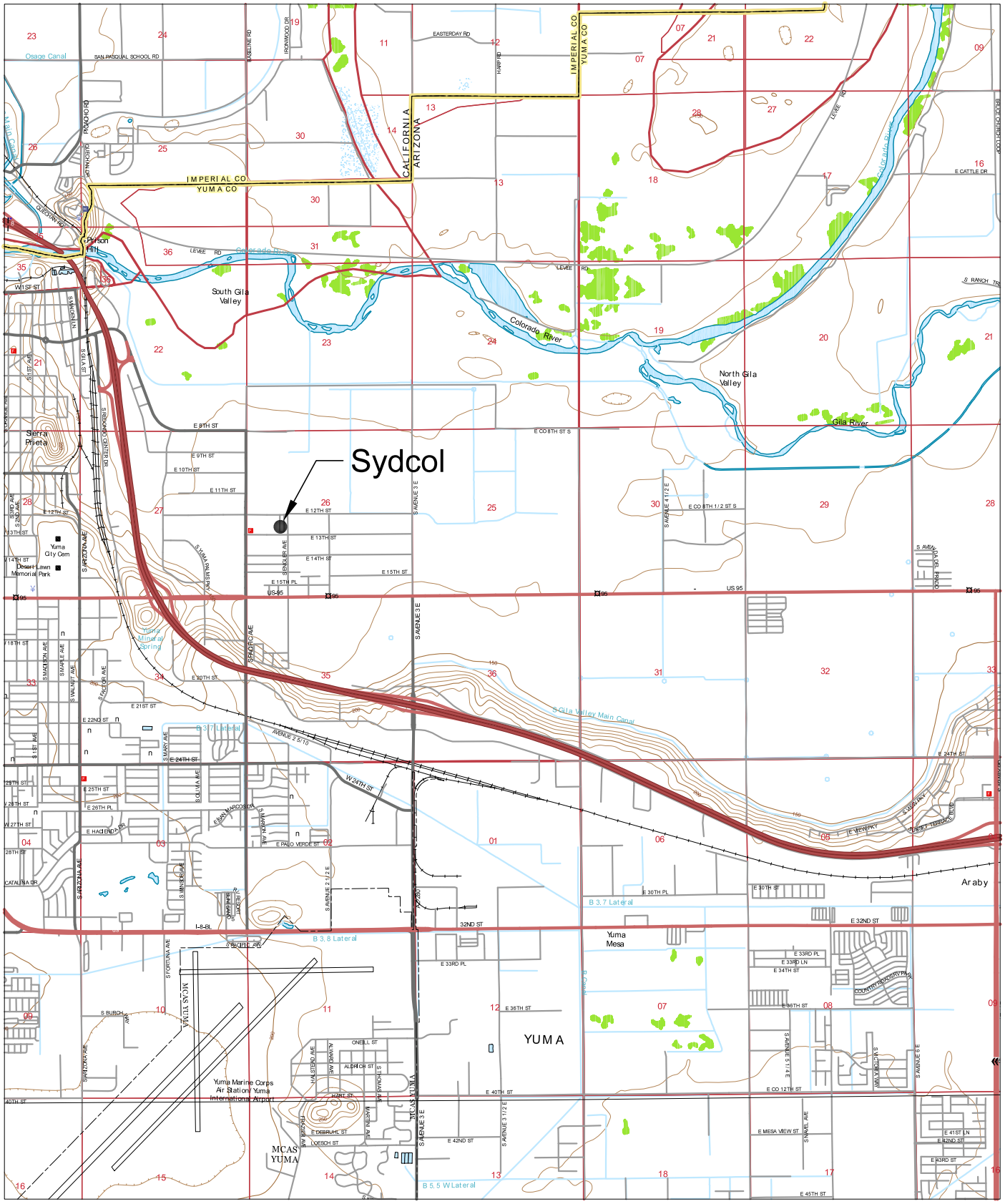
Notes:
SW-846: EPA Test Methods for Evaluating Solid Waste
ASTM: American Society for Testing Materials
1: Method described in Appendix C

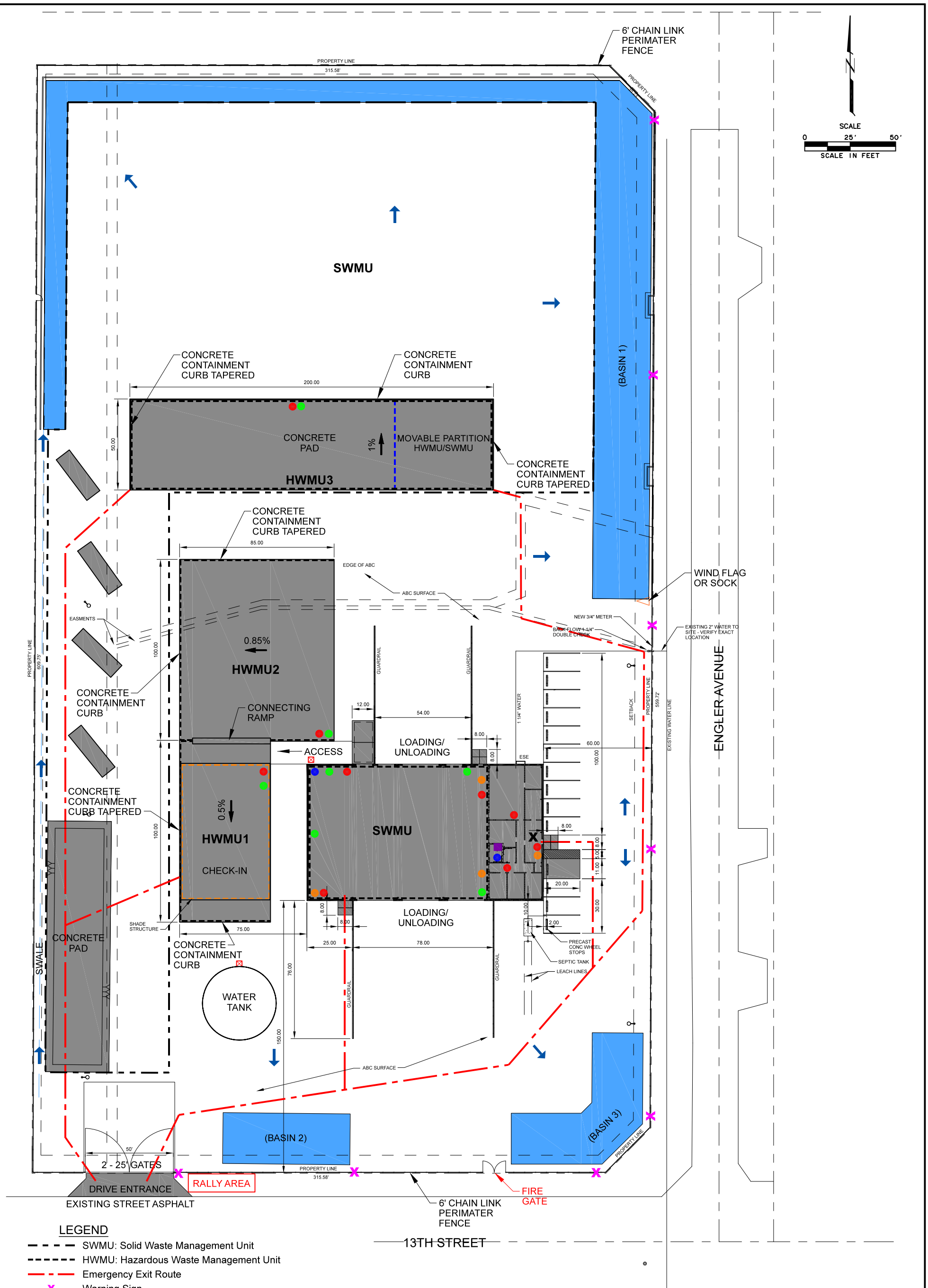
Table 5
Third-party Laboratory Analysis Methods

Analyte	Test Method
Cyanide	SW-846 Methods 9010C, 9012B, 9013, 9014
pH	SW-846 Method 9040C; pH Electrometric
Oxidizer Screen	ASTM D4981-12
Specific Gravity & Bulk Density	ASTM D6111-13A
Acidity	SM 2310
Alkalinity	SM 2320
Sulfide Screen	ASTM D4978-95
Oil & Grease	SW-846 Method 9074 Total Recoverable Oil & Grease SW-846 Method 9071B Oil & Grease Grease Extraction SM 5520
Flash Point	SW-846 Method 1010A Pensky-Martens Closed-Cup SW-846 Method 1020B Setaflash Closed-Cup
Ignitable Solids	SW-846 Method 1030
Compatibility	ASTM D-5058A
Semi-Volatile Organic Compounds	SW-846 Method 8270D
Pesticides/Herbicides	SW-846 Method 8081B, 8141B
Volatile Organic Compounds	SW-846 Method 8260B
Paint Filter	SW-846 Method 9095B Paint Filter Liquids Test
Metals	SW-846 Method 6010B, 7470A, 7471, 1311, 7199
SW-846	EPA Test Methods for Evaluating Solid Waste
SM	Standard Methods for the Examination of Water and Wastewater
ASTM	American Society for Testing Materials

Notes:

FIGURES


Sydcol
IMPERIAL CO
YUMA CO
CALIFORNIA
ARIZONA
Colorado River
Gila River
South Gila Valley
North Gila Valley
Sierra Prieta
Yuma City Cem
Desert Lawn Memorial Park
Yuma Mineral Spring
S Gila Valley Main Canal
B 3.7 Lateral
B 3.8 Lateral
B 5.5 W Lateral
Yuma Mesa
YUMA
Araby
Yuma Marine Corps Air Station/Yuma International Airport
MCAS YUMA
US 95
I-8-BL
E 8TH ST
E 9TH ST
E 10TH ST
E 11TH ST
E 12TH ST
E 13TH ST
E 14TH ST
E 15TH ST
E 20TH ST
E 24TH ST
W 24TH ST
32ND ST
E 40TH ST
E 42ND ST
E 45TH ST
E CO 8TH ST S
E CO 8TH 1/2 ST S
E CO 12TH ST
S AVENUE 3 E
S AVENUE 2 1/2 E
S AVENUE 3 1/2 E
S AVENUE 5 1/2 E
S AVENUE 1 E
S ARIZONA AVE
S MAIN ST
S GILA ST
S FORTUNA AVE
S MARY AVE
S COLMA AVE
S MCKEEN AVE
S MAPLE AVE
S WALNUT AVE
S PACIFIC AVE
S SENDER AVE
S MCLEAN AVE
S MCCAS YUMA
S MCTOWNSEND AVE
S MCTOWNSEND PL
S MCTOWNSEND LN
S MCTOWNSEND WAY
S MCTOWNSEND CT
S MCTOWNSEND TER
S MCTOWNSEND RD
S MCTOWNSEND PKWY
S MCTOWNSEND BLVD



LEGEND

- SWMU: Solid Waste Management Unit
- HWMU: Hazardous Waste Management Unit
- Emergency Exit Route
- Warning Sign
- Spill Kit
- Fire Alarm
- Fire Extinguisher (ABC)
- Eyewash
- Shower
- Facility Report
- Fire Hose Connection
- Concrete Surface
- Drainage Direction
- Drainage Basin

Figure 2
SITE PLAN
Sydcol
2264 E. 13th St.,Yuma, AZ 85365

CLIENT:	APPROVED BY: JGP
PROJECT:	PROJECT NO:
DESIGNED BY: JGP	DATE: 11/5/21
DRAWN BY: TML	DWG/FILE: SYDCOL02
REVISION:	

JGP Consulting, PLC
Environmental Compliance Services

APPENDICES

APPENDIX A

EXAMPLE WASTE PROFILE FORM

Use Only	
Quote #:	WS#:
Business Type: Repeatable: ☐	Non-Repeatable: ☐
Product Code:	Price:

Please review instructions before completing this form.

1. GENERATOR INFORMATION ( )	
Generator Name	
Address	
City, State	
Zip, County	
Tech. Contact Name	
Phone	Fax
24 Hour Emergency Number	
E-mail Address	
US EPA ID Number	
State ID Numbers	
Status LQG ☐ SQG ☐ CESQG ☐ Non-hazardous ☐	

2. BILLING INFORMATION ( )	
Customer Name	
Address	
City, State	
Zip, County	
Contact Name	
Phone	Fax
E-mail Address	
3. MANIFEST MAIL ADDRESS *(If different from generator)*	
Contact Name	
Company Name	
Address	
City, State, Zip	

4. Generator SIC Code	If 3312, generated from Coke Oven Byproduct Recovery Operations? Yes ☐ No ☐	If 28_ _, 2911, 3312, or 4953, what is the Total Annual Benzene (TAB) in Megagrams/year?
5. Common Name		
6. Process Generating Waste		
7. DOT Description		

8.	Identify US EPA waste codes	
9.	D001-D043, F001-F005, or F039 underlying or hazardous constituents present? Yes☐ No☐ NA☐ If yes, list in Section 12.	
10.	US EPA Form Code	US EPA Source Code
11.	Identify state waste codes	

12. Waste Composition: Using specific chemical names and/or descriptions of waste composition, list all constituents present in the wastestream, and identify those that are underlying hazardous constituents (UHCs), or F001-F005/F039 hazardous constituents. Attach available analysis or MSDSs. **Total composition must equal or exceed 100%.**

Constituents	Range	Units	UHC?	F-Listed?
Choose an item.			Yes ☐	Yes ☐
Choose an item.			Yes ☐	Yes ☐
			Yes ☐	Yes ☐
			Yes ☐	Yes ☐
			Yes ☐	Yes ☐
			Yes ☐	Yes ☐
			Yes ☐	Yes ☐

13.	Color	Odor	

14.

14a. Chemical Properties				14b. Physical Properties at 70°F			
Flash Point (F°)	< 73	☐	BTU/lb Range	Solid	☐	Free Liquids/Fail Paint Filter?	Yes ☐ No ☐
	73-<100	☐		Liquid	☐	Will waste dump out of drums?	Yes ☐ No ☐
	100-<140	☐		Sludge	☐	Is the waste pumpable?	Yes ☐ No ☐
	140-<200	☐	Low	Semi-solid	☐	Will heat improve flow?	Yes ☐ No ☐
	>= 200	☐		Powder	☐	Debris?(List type in Section 12)	Yes ☐ No ☐
			High	Gas	☐	Dust hazard?	Yes ☐ No ☐
Boiling Point (F°)	< 100	☐	pH Range	% Solids		% Liquids	
	> 100	☐					

Common Name (same as Item #5): s

15. Check all that apply. Marking any of these may require additional documentation or follow-up information for approval. ***** Marks new sections.**

*15a. Potential High Hazards			
Air Reactive	☐	Shock Sensitive	☐
Autoignitable	☐	Spontaneously Combustible	☐
Cyanide	☐	Sulfide	☐
Explosive	☐	Temperature Control Required	☐
Metal Fines	☐	Temperature Sensitive	☐
Metal Powders	☐	Water Reactive	☐
Organic Peroxides	☐	Not Applicable	☐
Oxidizers	☐		
Peroxide Forming	☐		
Pyrophoric	☐		
Self Heating	☐		

15b. Other Properties			
Aerosols	☐	Infectious Agents	☐
Ammonia	☐	Insecticide	☐
Asbestos	☐	Lab Pack	☐
Biological	☐	Medical	☐
Carcinogen	☐	Pathogen	☐
Chelating Agent	☐	Pesticide	☐
Compressed Gas	☐	Polymerizable	☐
Dioxins,Furans	☐	Radioactive	☐
Etiological	☐	Sanitary	☐
Herbicide	☐	Sharps	☐

15e. Used oil? (40 CFR 279)
Yes ☐ No ☐

Used oil mixed with hazardous waste?
Yes ☐ No ☐

Total Halogens (TX) concentration?
< 1000 PPM ☐
> 1000 PPM ☐

15f. PCBs? (40 CFR 761)
Yes ☐ No ☐

If yes, PCB concentration?(ppm)
0-49 ☐
50-499 ☐
>= 500 ☐

Greater than 50 ppm source?
Yes ☐ No ☐

15g. Subject to Subpart CC? (40CFR 264/5. 1080-1091, LQG>26gal, >500ppmw VOC)
Yes ☐ No ☐

15h. Subject to Benzene NESHAP controls? (40 CFR 61.340-358)
Yes ☐ No ☐

15i. Does this material require any special handling related to employee safety, storage conditions, spill clean-up, sampling, etc.? Yes ☐ No ☐
If yes, explain below: _____

15j. Do any exclusions/exemptions apply? Yes ☐ No ☐
If yes, describe: _____

15k. Is this material overpacked? Yes ☐ No ☐
If yes, explain why: _____

15l. Does this material have potential to build pressure in the container? Yes ☐ No ☒
If yes, explain: _____

15c. Have the containers been stored outside? Yes ☐ No ☒ If yes, condition? _____

15m. Has this material been rejected from another facility? Yes ☐ No ☒
If yes, explain why: _____

15d. Does this waste have any undisclosed hazards or prior incidents associated with it, which could affect the way it should be handled? Yes ☐ (If yes, attach detailed explanation) No ☐

15n. Additional Comments/ Special Waste Type: Yes ☐ No ☐
_____

16. Transporter: Heritage Transport ☐ Other ☐ (Complete below)
Transporter Name _____
Address _____
City, State, Zip _____
Contact/Phone _____
US EPA ID No. _____

17. Packaging:		Size:	18. Volume:
Bulk Liquid	☐	_____	
Bulk Solid	☐	_____	
Cu Yd Bag/Box	☐	_____	_____/Year
Cylinder	☐	_____	
Drum	☐	_____	_____/Shipment
Tote (Metal)	☐	_____	
Tote (Poly)	☐	_____	

19. Check or List Attachments: Lab Data ☐ MSDS ☐ Cylinder Form ☐ Packing List ☐ Other (list) ☐ _____

20. CERTIFICATION Sign and date the certification. I hereby certify that I am an authorized agent of the generator, and warrant on behalf of the generator, that all information submitted herein and attached documentation contains true, accurate and complete descriptions of this material. Any sample submitted for analysis or attached laboratory data is representative of the material being offered for approval. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I will notify Heritage Environmental Services, LLC or Heritage-WTI, Inc. of any changes in generator status, any information on this form, or any information on the attachments. This certification and signature apply to this form, to all attachments checked in section 19, and to the land disposal restriction notification (LDR) generated from this information. For Lab Packs only: To the best of my knowledge, all labels on the inner and outer containers, and all information recorded on the packing inventory sheet for each Lab Pack, correctly identifies the contained chemicals. Where testing has been necessary to characterize material in the lab pack, I have used test methods equivalent to those specified in the Permittee's current operating permit Lab Pack Procedure.

Signature _____ Printed Name _____ Date _____ Company _____

21. **COMPLETE THIS SECTION FOR NON-HAZARDOUS MATERIAL**

21a. Is this waste a listed waste? (U, P, K, or F codes) Yes ☐ No ☐

21b. This waste is not characteristically hazardous for D001-D043 based on attached lab data (**mark LD**), attached MSDS (**mark MSDS**), or generator knowledge(**mark GK**).

D001 (Ignitability)			D038 Pyridine
D002 (Corrosivity)	**TCLP VOLATILES**	**TCLP SEMI-VOLATILES**	D041 2,4,5-Trichlorophenol
D003 (Reactivity)	D018 Benzene	D023 o-Cresol	D042 2,4,6-Trichlorophenol
TCLP METALS	D019 Carbon Tetrachloride	D024 m-Cresol	
	D021 Chlorobenzene	D025 p-Cresol	**HERBICIDES & PESTICIDES**
D004 Arsenic	D022 Chloroform	D026 Cresol	D012 Endrin
D005 Barium	D028 1,2 –Dichloroethane	D027 1,4-Dichlorobenzene	D013 Lindane
D006 Cadmium	D029 1,1-Dichloroethylene	D030 2,4-Dinitrotoluene	D014 Methoxychlor
D007 Chromium	D035 Methyl Ethyl Ketone	D032 Hexachlorobenzene	D015 Toxaphene
D008 Lead	D039 Tetrachloroethylene	D033Hexachlorobutadiene	D016 2,4-D
D009 Mercury	D040 Trichloroethylene	D034 Hexachloroethane	D017 2,4,5-TP(Silvex)
D010 Selenium	D043 Vinyl Chloride	D036 Nitrobenzene	D020 Chlordane
D011 Silver		D037 Pentachlorophenol	D031 Heptachlor

APPENDIX B

EXAMPLE LDR NOTIFICATION/CERTIFICATION FORM

Land Disposal Restrictions One-Time Notification/Certification

1. Generator information:	**2. Receiving facility information (if applicable):**
Name _____	Name _____
Address _____	Address _____
_____	_____
EPA ID No. _____	EPA ID No. _____
	Manifest No._____

3. Waste description at point of generation:

Line item	Waste description	Hazardous waste code(s)	LDR Subcategory	WW/ NWW	Underlying hazardous constituents [§268.2(i)][1]
1					
2					
3					
4					

4. Waste disposition:

Line item	Subtitle C exclusion subsequent to point of generation (if applicable)	Current disposition of waste	§268.45, Table 1 technology used to treat debris (if applicable)	Date shipped (if applicable)
1				
2				
3				
4				

5. Was the waste hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste or exempt from Subtitle C regulation (including characteristic wastes managed in wastewater treatment systems discharging under the CWA)? ☐ Yes ☐ No (If yes, this constitutes the §268.7(a)(7) one-time notification.)[2]

6. Was the waste characteristic at the point of generation, treated onsite to remove all characteristics, and treatment residues then shipped to a Subtitle D land disposal facility? ☐ Yes ☐ No (If yes, complete Certification 1, 2, 3, or 4.)[2]

7. Was the waste "debris" that was hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste under §261.3(f)(1) by treating it using an extraction or destruction technology in §268.45, Table 1? ☐ Yes ☐ No (If yes, complete Certification 5.)[3]

8. Was the waste "debris" that was hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste under §261.3(f)(2) by receiving a "no-longer-contains" determination from EPA or the authorized state? ☐ Yes ☐ No (If yes, this constitutes the §268.7(d)(1) one-time notification.)[4]

9. Was the waste "soil" that was hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste via a "no-longer-contains" determination from EPA or the authorized state or by the generator determining that the soil no longer exhibits a characteristic? ☐ Yes ☐ No (If yes, this notice and all supporting information and documentation must be maintained in the facility files for at least three years per §268.7(e).)

10. Is the waste residue from treating K061, K062, and/or F006 wastes in high-temperature metals recovery (HTMR) units that 1) meets the generic exclusion levels in §261.3(c)(2)(ii)(C), 2) does not exhibit any characteristics, and 3) is shipped to a Subtitle D land disposal facility? ☐ Yes ☐ No (If yes, complete Certification 6.)[5]

Land Disposal Restrictions One-Time Notification/Certification (Continued)

1.☐ Waste that has been treated to remove characteristics and that did not contain underlying hazardous constituents at the point of generation. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 *CFR* 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Applies to manifest line items: _____ _____ *Reference: §§268.7(b)(4) and 268.9(d)*
2.☐ Waste that has been treated to remove characteristics and to meet universal treatment standards for underlying hazardous constituents. I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 *CFR* 268.40 to remove the hazardous characteristic and that underlying hazardous constituents, as defined in §268.2(i) have been treated on-site to meet the §268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Applies to manifest line items: _____ _____ *Reference: §§268.7(b)(4)(v) and 268.9(d)*
3.☐ Waste that has been treated to remove characteristics but does not meet universal treatment standards for underlying hazardous constituents. I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 *CFR* 268.40 or 268.49 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Applies to manifest line items: _____ _____ *Reference: §§268.7(b)(4)(iv) and 268.9(d)*
4.☐ Soil that has been treated to meet the alternative treatment standards. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 *CFR* 268.49 without impermissible dilution of the prohibited wastes. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Applies to manifest line items: _____ _____ *Reference: §268.7(b)(4)*
5.☐ Debris that has been treated to meet the alternative treatment standards. I certify under penalty of law that the debris has been treated in accordance with the requirements of 40 *CFR* 268.45. I am aware there are significant penalties for making a false certification, including the possibility of fine and imprisonment.	Applies to manifest line items: _____ _____ *Reference: §268.7(d)(3)(iii)*
6.☐ HTMR residue from treating K061, K062, and/or F006 wastes. I certify under penalty of law that the generic exclusion levels for all constituents have been met without impermissible dilution and that no characteristic of hazardous waste is exhibited. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Applies to manifest line items: _____ _____ *Reference: §261.3(c)(2)(ii)(C)*
Generator's signature Printed/typed name & title	Date

[1]Use an attachment if necessary. If all underlying hazardous constituents will be treated and monitored, there is no requirement to list any on this notification.

[2]This one-time notification is placed in the facility's onsite files only. For compliance with the §268.9(d) one-time notification and certification, if the waste does not meet universal treatment standards for underlying hazardous constituents (i.e., Certification 3 above), the generator must somehow communicate the need for UHC treatment to the Subtitle D facility; the notification and certification must be updated if the process or operation generating the waste changes and/or if the Subtitle D receiving facility changes.

[3]This one-time notification must be sent to EPA or the authorized state and placed in the facility's files. It is not sent with the shipment to the Subtitle D receiving facility. The notification must be updated if 1) a different type of debris is treated, 2) a different §268.45, Table 1 technology is used to treat the debris, and/or 3) the Subtitle D receiving facility changes. The certification (Certification 4 above) must be placed in the facility's files for each shipment of treated debris.

[4]This one-time notification must be sent to EPA or the authorized state and placed in the facility's files. It is not sent with the shipment to the Subtitle D receiving facility. The notification must be updated if the Subtitle D receiving facility changes.

[5]This one-time notification and certification must be sent to EPA or the authorized state and placed in the facility's files. It is not sent with the shipment to the Subtitle D receiving facility. The notification and certification must be updated if the process or operation generating the waste changes and/or if the Subtitle D receiving facility changes.

Source: McCoy and Associates, Inc.

APPENDIX C

INDUSTRY-STANDARD UNPUBLISHED METHODS

Reactive Sulfide Screen

1. Collect a representative sample of the waste.
2. Place approximately 5 milliliters (mL) of the sample in a test tube.
3. Remove a piece of Cyantesmo paper from the dispenser and crimp.
4. In the fume hood, add 1 mL concentrated sulfuric acid to the test tube and swirl to mix.

Note: Only add a small amount of sulfuric acid. A strong reaction can occur with alkaline materials.

5. Take the Cyantesmo paper and hang it in the test tube placing the paper so that approximately 10 millimeters of paper is actually immersed in the liquid, but making certain that part of the paper remains in the gas zone above the liquid level.
6. Just above the liquid level is the most reactive zone for the test paper. Look at this area immediately. IF high concentrations of cyanide are present, it will show up quickly, but the paper may become saturated and turn back to white, so it is important that you watch closely.
7. If there was no immediate indication of cyanide presence, you must wait a minimum of 15 minutes before it is safe to make the call that a material does not contain cyanide.
8. If a blue color has developed, the sample should be considered positive for cyanide, and submitted to the laboratory for further testing.
9. If the result is negative, verify that the pH of the solution is <2. If not, then repeat steps 4 through 7.

Oxidizer screen

1. Collect a representative sample of the waste.
2. Dip one end of a piece of potassium iodide (KI) starch paper into the sample. If the sample is a solid, mix dry waste with water at 1:1 ration.
3. If the KI paper develops a brown or black color, the sample should be considered oxidizer positive.

Reactive Sulfide Screen

1. Collect a representative sample of the waste.
2. Place approximately 5 mL of the sample in a test tube.
3. Remove a piece of the lead-acetate paper from the dispenser, moisten with water and crimp.
4. In the fume hood, add 1 mL concentrated sulfuric acid to the test tube and swirl to mix.

   Note: Only add a small amount of sulfuric acid. A strong reaction can occur with alkaline materials.
5. Take the lead-acetate paper and hang it in the test tube placing the paper in the vapor phase of the test tube. Do not let the paper touch the liquid.
6. Let stand undisturbed for at least one minute.
7. If a brown or black color has developed, the sample should be considered positive for sulfides.
8. If the result is negative, verify that the pH of the solution is < 2, If the pH is > 2, repeat steps 4 through 7.

Ignitability Screen (Flash)

1. Collect a representative sample of the waste.
2. Under the fume hood, transfer enough waste into an aluminum burning dish to just cover the bottom of the dish.
3. Take a match and hold the flame approximately one inch above the material to determine whether the vapors will ignite. If the vapors ignite then the flashpoint should be considered less than 70 degrees F.
4. If the vapors do not ignite, put the lit match directly into the waste. If the waste ignites and continues to burn, the flashpoint should be considered less than 100 degrees F.
5. If the vapors do not ignite, and the waste cannot be made to burn by the introduction of a flame, then it can be presumed that the flashpoint is greater than 140 degrees F.

Waste Compatibility (Bucket test)

General overview: Representative samples from each container to be consolidated are placed into the same collection container (bucket) in the order in which the containers are to be consolidated. Signs of a reaction such as fuming, bubbling, and temperature change are noted. If no reactions occur, then the wastes can be consolidated. If there are signs of reaction, the order of the consolidation of containers may change or the material will not be consolidated. Document the consolidation on the attached form.

Wear PPE appropriate for processing the waste. Minimally gloves, eyeglasses, and respiratory protection.

Test procedure:

1. Determine if all the containers being sampled are at the same temperature. If not, sample the containers from warmest to coolest. If containers are approximately the same temperature, sample the containers in the desired order of consolidation. Number the containers in the order to be sampled.

2. Place a sample from the first container into the bucket along with a graduated thermometer with a range of 0 to 100 degrees C. The sample should be at least ½ pint for drum quantities, or 1 pint for quantities greater than 100 gallons.

3. Make note of the temperature of the first sample. Leaving the thermometer in the bucket, obtain a sample from the second container. Slowly add the sample from the second container into the bucket. Use caution to avoid potential splatter.

4. Make note of any splatter, bubbling, or fuming. If any of these reactions occur, or if the temperature increases more than 10 degrees C, consider the materials to be incompatible and discontinue the test. Reconsider the containers to be consolidated and restart the test with the revised list of consolidation containers.

5. Continue to sample the remainder of the containers, checking the bucket after every addition and making not of any reactions. Record the order in which the containers are sampled and note any reaction.

6. If all samples are consolidated in the bucket without reaction or temperature increase, allow the bucket to sit for 15 minutes wit a cover placed loosely over the top. Note the temperature and appearance after 15 minutes. If the temperature has increased more than 10 degrees C, or if the sample has foamed, jelled, or increased in volume, consider the materials to be incompatible and discontinue consolidation operations.

7. If no reactions or temperature increase occurs, the materials are acceptable for consolidation. The containers to be consolidated and their order of consolidation must be observed during consolidation of the containers.

AA Sydcol, LLC
Bucket Test Documentation

Date:

Technician performing test:	**Signature:**
Approving supervisor/manager:	**Signature:**

Container	Temperature (°C)	Reaction (Y/N)	Comments:

Time elapsed for temperature check: **(required 15 minues)**