



Site:

EPA ID:

Date:

## Waste Analysis Checklist

INSPECTION ITEM	CITATION	COMMENTS
Before an owner/operator treats, store or disposes of any waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste.	40 CFR 265.13(a)(1)	
At a minimum, the analysis must include all information needed to safely treat, store or dispose of the waste.	40 CFR 265.13(a)(1)	
Has the owner/operator included a provision for repeating waste analysis on a routine basis?	40 CFR 265.13(a)(3)	
If the owner/operator accepts hazardous waste from an off-site source, does he have a provision in place to inspect and analyze, if necessary, each shipment of hazardous waste to determine whether it matches the manifest information?	40 CFR 265.13(a)(4)	
Waste Analysis Plan (WAP): The owner/operator must have a written WAP that describes the procedures which will be followed to comply with the above requirements. Is the WAP on-site?	40 CFR 265.13(b)	
At a minimum, the WAP must include the following: 1. A parameter list and the rationale for the parameter selection. 2. The test method(s) which will be used to analyze the parameters. 3. The sampling method used to obtain a representative sample of the waste for analysis. The sampling method must be one of the Appendix I methods (Part 261) or an equivalent. 4. The frequency that the initial analysis is repeated to ensure that the analysis is accurate and up to date. 5. Does the WAP identify the pre-acceptance analysis, supplied by generators, for off-site wastes, and 6. Does the WAP identify the methods used to meet the additional waste analysis requirements for specific regulated units (e.g. tanks, waste piles, landfills, incinerators, etc.)?	40 CFR 265.13(b)(1)  40 CFR 265.13(b)(2)  40 CFR 265.13(b)(3)  40 CFR 265.13(b)(4)  40 CFR 265.13(b)(5)  40 CFR 265.13(b)(6)	

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Has the WAP addressed the special waste analysis needs of a surface impoundment exempted from LDR under 40 CFR 268.4(a)?	40 CFR 265.13(b)(7)	
Does the WAP address the waste analysis requirements for owners/operators seeking an exemption for Subpart CC emission standards?	40 CFR 265.13(b)(8)	
Owners/operators that accept waste from off-site sources must have waste analysis procedures in place which can meet the following requirements:  1. Acceptance criteria for waste generated off-site  2. Sampling methods used to obtain a representative sample of the waste, and  3. Procedures for assessing whether the generator added a biodegradable sorbent to the waste prior to shipment.	40 CFR 265.13(c)  40 CFR 265.13(c)(1)  40 CFR 265.13(c)(2)  40 CFR 265.13(c)(3)	
<u>Additional Comments:</u>          		
For more information regarding interim status waste analysis requirements, the reviewer should consult 40 CFR 265.13. To assess whether the facility is complying with LDR waste analysis requirements, the reviewer should consult 40 CFR 268.7.		