




# WASTE PROFILES AND SAMPLING 2025

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Florida Department of Environmental Protection

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## Waste Determination

[40 CFR 262.11]

**A person who generates a solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. A hazardous waste determination is made using the following steps:**

- Step One:** Make at point of generation [40 CFR 262.11(a)];
- Step Two:** Determine if excluded [40 CFR 262.11(b)];
- Step Three:** Determine if listed [40 CFR 262.11(c)];
- Step Four:** Determine if characteristic [40 CFR 262.11(d)];
- Step Five:** Determine other possible exclusions/restrictions [40 CFR 262.11(e)];
- Step Six:** Document determinations [40 CFR 262.11(f)];
- Step Seven:** Identify waste codes [40 CFR 262.11(g)].

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## Waste Determination

[40 CFR 262.11(a)]

### STEP ONE

**(a) The hazardous waste determination for each solid waste must be made at the point of waste generation, BEFORE any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the RCRA classification of the waste may change.**

**STEP TWO – separate presentation available upon request.**

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## Waste Determination – Listed?

[40 CFR 262.11(c)]

### STEP THREE

**(c) If the waste is not excluded under 40 CFR 261.4, the person must then use knowledge of the waste to determine whether the waste meets any of the listing descriptions under Subpart D of 40 CFR Part 261.**

**Acceptable knowledge that may be used in making an accurate determination as to whether the waste is listed may include waste origin, composition, the process producing the waste, feedstock and other reliable and relevant information.**

**If the waste is listed, the person may file a delisting petition under 40 CFR 260.20 and 260.22 to demonstrate to the Administrator [i.e., EPA] that the waste from this particular site or operation is not a hazardous waste.**

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## Waste Determination – Listed?

### **Listing Descriptions under Subpart D of 40 CFR 261:**

**261.31 - Non-specific Sources (F codes):** tetrachloroethylene (perc), trichloroethylene (trike), methylene chloride; xylene, acetone, methyl isobutyl ketone (MIBK); toluene, methyl ethyl ketone (MEK), isobutyl alcohol; electroplating; metal finishing; wood preservation; refinery wastewater sludges.

**261.32 - Specific Industry Sources (K codes):** wood preservation, pesticide production, iron and steel industries.

**261.33 - Commercial Chemicals (P and U codes):** unused, off-spec, technical grade chemicals that are going to be discarded.

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## Waste Determination – Listed Example

**Example: SDS for a common solvent used for cleaning paint equipment – Klean Strip Lacquer Thinner.**

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3. COMPOSITION/INFORMATION ON INGREDIENTS		
CAS #	Hazardous Components (Chemical Name)	Concentration
67-64-1	Acetone (2-Propanone)	<50.0 %
64742-89-8	Light aliphatic solvent naphtha (petroleum)	<=35.0 %
108-88-3	Toluene (Benzene, Methyl-, Toluol)	<=31.5 %
67-56-1	Methanol (Methyl alcohol; Carbinol; Wood alcohol)	<=35.0 %
141-78-6	Acetic acid, ethyl ester (Ethyl acetate)	<15.0 %
111-78-2	Ethanol, 2-Butoxy- (Ethylene glycol n-butyl ether, (a glycol ether))	< 5.0 %
98-56-6	4-Chlorobenzotrifluoride (4-Chloro-.alpha...alpha...alpha...trifluorotoluene)	< 5.0 %
763-69-9	Ethyl 3-ethoxypropionate (Papanoic acid, 3-ethoxy-, ethyl ester)	
8052-41-3	Stoddard solvent (Mineral spirits; Aliphatic Petroleum Distillates; White spirits)	
<b>Additional Chemical Information</b>	Following products listed as hazardous: 4-Chlorobenzotrifluoride (98-56-6) 3-ethoxypropionate (763-69-9)	

9. PHYSICAL AND CHEMICAL PROPERTIES	
Physical States:	<input type="checkbox"/> Gas <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Solid
Appearance and Odor:	Water White / Free and Clear
Melting Point:	No data.
Boiling Point:	133.00 F
Autoignition Pt:	No data
Flash Pt:	< 15.00 F Method Used: Setaflash Closed Cup (Rapid Setaflash)
Explosive Limits:	LEL: 1 UEL: 7
Specific Gravity (Water = 1):	0.7742 - 0.7942

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Waste Determination – Characteristic? [40 CFR 262.11(d)]	
<b>STEP FOUR</b>	
<b>(d) The person <u>then</u> must <u>also</u> determine whether the waste exhibits one or more <u>hazardous characteristics</u> as identified in <u>Subpart C of 40 CFR Part 261</u> by following the procedures in paragraph (d)(1) or (d)(2) of this section or a combination of both.</b>	

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## Waste Determination – Characteristic?

[40 CFR 262.11(d)(1)]

**(d)(1) The person must apply knowledge of the hazard characteristic of the waste in light of the materials or the processes used to generate the waste. Acceptable knowledge may include process knowledge (e.g., information about chemical feedstocks and other inputs to the production process); knowledge of products, by-products and intermediates produced by the manufacturing process; chemical or physical characterization of wastes; information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste; testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents.**

**A test other than a test method set forth in Subpart C of 40 CFR Part 261, or an equivalent test method approved by the Administrator under 40 CFR 260.21, may be used as part of a person's knowledge to determine whether a solid waste exhibits a characteristic of hazardous waste. However, such tests do not, by themselves, provide definitive results. Persons testing their waste must obtain a representative sample of the waste for the testing, as defined at 40 CFR 260.10.**

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## Waste Determination – Characteristic?

[40 CFR 262.11(d)(1)]

**Hazardous characteristics are found in Subpart C of 40 CFR Part 261**

**261.21 – Ignitability D001**

**261.22 – Corrosivity D002**

**261.23 – Reactivity D003**

**261.24 - Toxicity D004 – D043: 8 RCRA heavy metals, semi-volatiles (SVOCs), volatiles (VOCs), pesticides, herbicides.**

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## Waste Determination – Characteristic Example


**Example: SDS for a common primer – Intrepid Coatings Yellow Zinc Chromate Primer**

**SDS for a common paint – Carboline Thermaline 4700 VOC Aluminum**

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### SAFETY DATA SHEET (SDS)



**\*Our Coatings Fly All Over the World\***

TT-P-1757B Ty. I Cl. C Yellow Zinc Chromate Primer

**1. PRODUCT AND COMPANY INFORMATION**

PRODUCT NAME: TT-P-1757B Ty. I Cl. C Yellow Zinc Chromate Primer

DATE ISSUED :	6/7/2018
SDS REF. No :	200Y02


3. COMPOSITION/CHEMICAL INFORMATION		
Chemical Name	CAS Number	Weight %
*Zinc Chromate (Zn CrO <sub>4</sub> )	13530-65-9	20% to 25%
*Xylenes, Mixed Isomers	1330-20-7	15% to 20%
Phenol formaldehyde polymer	9003-35-4	15% to 20%
Acetone	67-64-1	5% to 10%
Limestone	1317-65-3	5% to 10%
Barium Sulfate	7727-43-7	1% to 5%
Silicon dioxide, chemically prepared	112945-59	

**Liquids:**  
**D001/D005/D007**

**Solids:**  
**D005/D007**

5. FIRE FIGHTING MEASURES
<b>FLASH POINT AND METHOD :</b> 54 degrees Fahrenheit Tagliabue Closed Cup (TCC)
<b>FLAMMABLE LIMITS :</b> 0.0% to 12.8%
<b>AUTOIGNITION TEMPERATURE :</b> No data available.

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**carboline** Safety Data Sheet  
prepared to UN GHS Revision 3

**1. Identification of the Substance/Mixture and the Company/Undertaking**

1.1 Product Identifier: 4704S1NL  
Product Name: THERMALINE 4700 VOC ALUMINUM  
Revision Date: 06/04/2015  
Monocomponent industrial

**3. Composition/Information On Ingredients**

3.2 Mixtures

Hazardous Ingredients

CAS-No.	Chemical Name	%
98-56-6	PARACHLOROBENZO TRIFLUORIDE	25-50
14808-60-7	MICROCRYSTALLINE SILICA	10-25
7429-90-5	ALUMINUM (DUST OR FUME)	10-25
64742-95-6	AROMATIC HYDROCARBON	2.5-30
108-88-3	TOLUENE	1.0-2.5
108-03-2	1-NITROPROPANE	1.0-2.5
108-38-3	META-XYLENE	1.0-2.5
100-41-4	ETHYL BENZENE	0.1-1.0

These solvents are *ingredients* in the paint.

**9. Physical and Chemical Properties**


9.1 Information on basic physical and chemical properties

Appearance: Viscous Aluminum Colored  
Physical State: Liquid  
Odor: Solvent  
Odor threshold:  
pH: N/D  
Melting point / freezing point (°C): N/D  
Boiling point/range (°C): 149 F (65 C) - 334 F (168 C)  
Flash Point (°C): 22

**Liquids:  
D001  
(22°C = 71.6°F)**

**Solids:  
Non-hazardous**

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## Waste Determination – Characteristic Testing

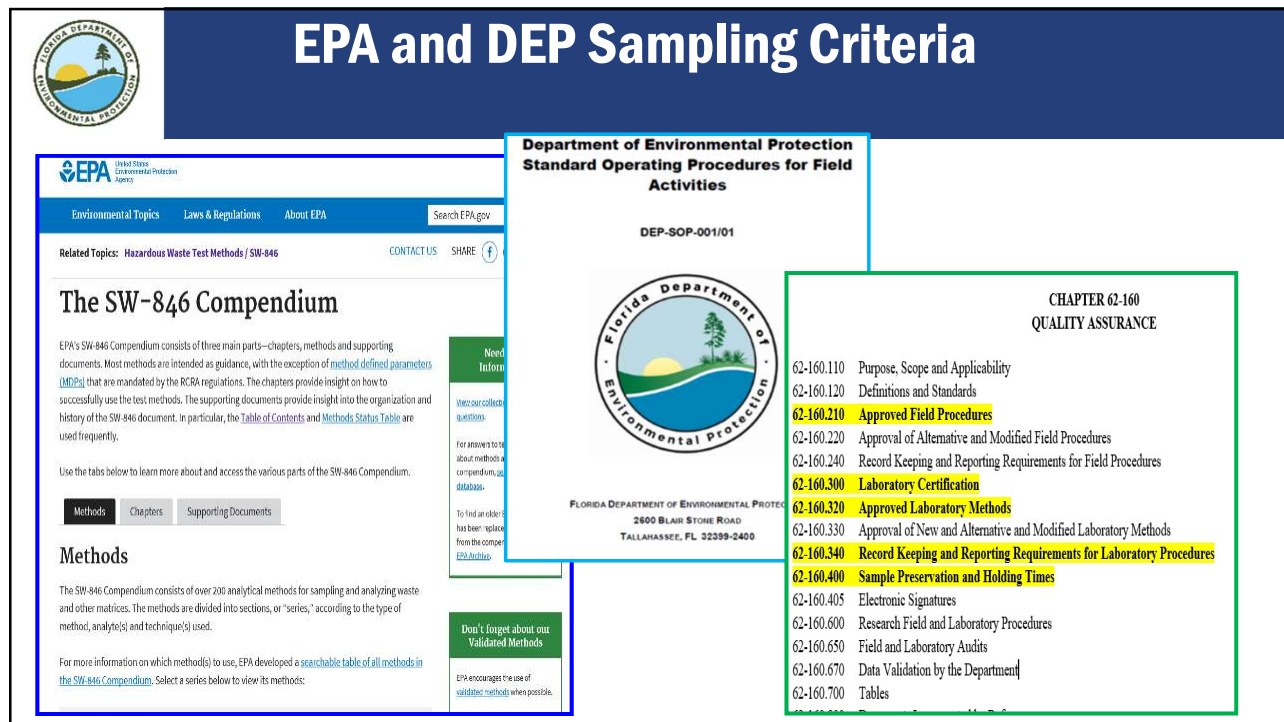
[40 CFR 262.11(d)(2)]

“(d)(2) When available knowledge is inadequate to make an accurate determination, the person **must** test the waste according to the applicable methods set forth in Subpart C of 40 CFR Part 261 [Ignitability, Corrosivity, Reactivity, Toxicity] or according to an equivalent method approved by the administrator, under 40 CFR 260.21 and in accordance with the following:

(i) Persons testing their waste **must** obtain a representative sample of the waste for the testing, as defined at 40 CFR 260.10.

(ii) Where a test method is specified in Subpart C of 40 CFR Part 261, the results of the regulatory test, when properly performed, are definitive for determining the regulatory status of the waste.

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**EPA and DEP Sampling Criteria**

**Department of Environmental Protection  
Standard Operating Procedures for Field Activities**  
DEP-SOP-001/01

**CHAPTER 62-160  
QUALITY ASSURANCE**

- 62-160.110 Purpose, Scope and Applicability
- 62-160.120 Definitions and Standards
- 62-160.210 Approved Field Procedures**
- 62-160.220 Approval of Alternative and Modified Field Procedures
- 62-160.240 Record Keeping and Reporting Requirements for Field Procedures
- 62-160.300 Laboratory Certification**
- 62-160.320 Approved Laboratory Methods**
- 62-160.330 Approval of New and Alternative and Modified Laboratory Methods
- 62-160.340 Record Keeping and Reporting Requirements for Laboratory Procedures**
- 62-160.400 Sample Preservation and Holding Times**
- 62-160.405 Electronic Signatures
- 62-160.600 Research Field and Laboratory Procedures
- 62-160.650 Field and Laboratory Audits
- 62-160.670 Data Validation by the Department
- 62-160.700 Tables

**The SW-846 Compendium**

EPA's SW-846 Compendium consists of three main parts—chapters, methods and supporting documents. Most methods are intended as guidance, with the exception of [method defined parameters \(MDPs\)](#) that are mandated by the RCRA regulations. The chapters provide insight into how to successfully use the test methods. The supporting documents provide insight into the organization and history of the SW-846 document. In particular, the [Table of Contents](#) and [Methods Status Table](#) are used frequently.

Use the tabs below to learn more about and access the various parts of the SW-846 Compendium:

Methods   Chapters   Supporting Documents

**Methods**

The SW-846 Compendium consists of over 200 analytical methods for sampling and analyzing waste and other matrices. The methods are divided into sections, or "series," according to the type of method, analyte(s) and technique(s) used.

For more information on which method(s) to use, EPA developed a [searchable table of all methods in the SW-846 Compendium](#). Select a series below to view its methods:

**Need Information?**

[View our collection questions.](#)

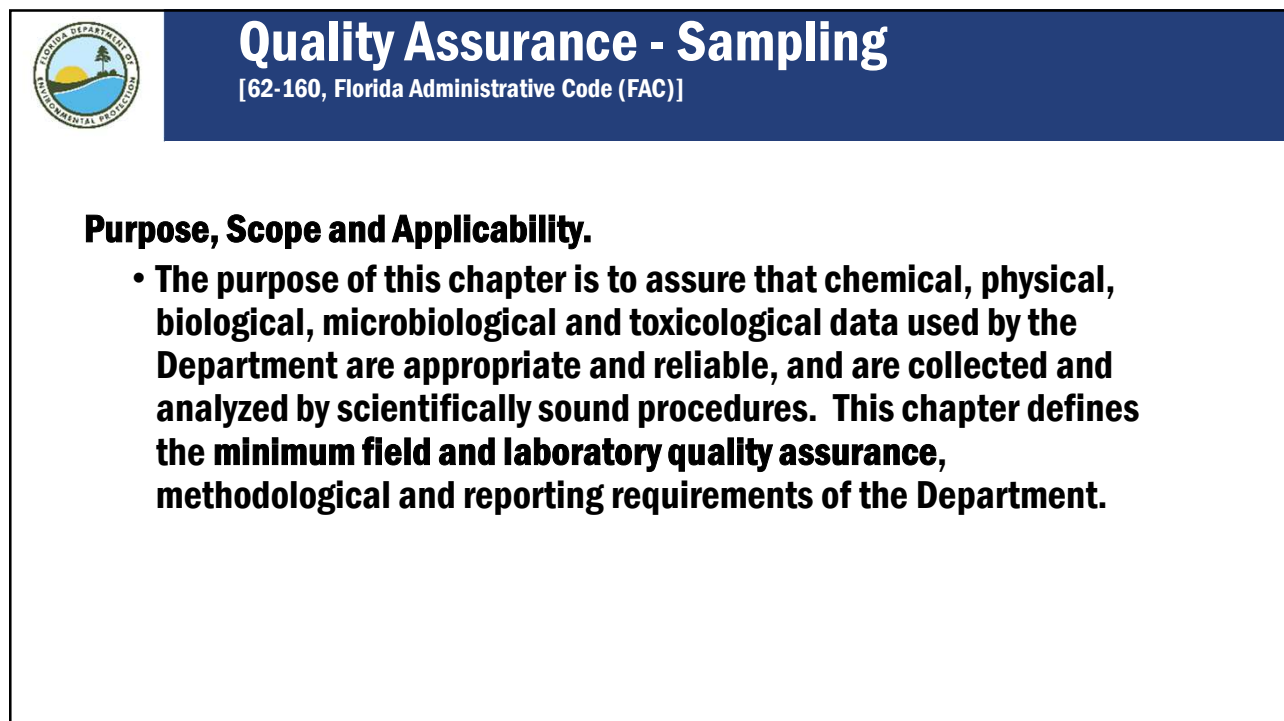
[For answers to questions about methods in the compendium, visit our database.](#)

[To find an older method that has been replaced from the compendium, visit our archive.](#)

**Don't forget about our Validated Methods**

EPA encourages the use of validated methods when possible.

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**Quality Assurance - Sampling**  
[62-160, Florida Administrative Code (FAC)]

**Purpose, Scope and Applicability.**

- **The purpose of this chapter is to assure that chemical, physical, biological, microbiological and toxicological data used by the Department are appropriate and reliable, and are collected and analyzed by scientifically sound procedures. This chapter defines the minimum field and laboratory quality assurance, methodological and reporting requirements of the Department.**

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## Quality Assurance - Sampling

[62-160, Florida Administrative Code (FAC)]

### **62-160.210 Approved Field Procedures.**

(1) All persons that conduct or support field activities and field measurements shall follow the applicable procedures and requirements described in the DEP SOP collections titled Standard Operating Procedures for Field Activities, DEP-SOP-001/01.

### **62-160.300 Laboratory Certification.**

(1) Except as provided in subsections 62-160.300(2) through (8), F.A.C., all laboratories generating environmental data for submission to the Department or for use in Department-regulated or Department-sponsored activities shall hold certification from the Florida Department of Health, Environmental Laboratory Certification Program (DOH ELCP). Such certification shall be for all matrix/test method/analyte(s) combinations being measured.

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## Quality Assurance - Sampling

[62-160, Florida Administrative Code (FAC)]

### **62-160.320 Approved Laboratory Methods.**

(1) Approved laboratory methods are specified in the Department's rules, contracts, orders or permits. When methods are specified by a Department rule, contract, order or permit, only those methods shall be used. For informational purposes, the Department maintains lists of methods, method compendiums and publication sources that have been recognized the Department.

### **62-160.340 Record Keeping and Reporting Requirements for Laboratory Procedures.**

(1)(a) The laboratory records shall contain sufficient information to allow independent reconstruction of all activities related to generating data that are submitted to the Department.

(b) In addition, the laboratory shall ensure that its records include all information necessary to support the analytical report.

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## Quality Assurance - Sampling

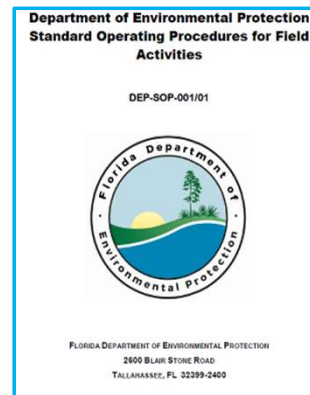
[62-160, Florida Administrative Code (FAC)]

### 62-160.400 Sample Preservation and Holding Times.

(1) Except as noted below... sample preservation methods, container types and holding times shall follow those requirements specified in DEP-SOP-001/01 (January 2017), part FS 1006 in FS 1000, which is incorporated by reference.

(2) Sample preservation procedures, container material and maximum allowable holding times for analytes not specified in DEP-SOP-001/01 (January 2017) shall follow the preservation, container and holding time requirements specified in the selected analytical method.

“preservation” = chemical or temperature  
“holding” = time between sample collection and analysis



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**Corrective Action:** In order to return to compliance, prior to the next routine disposal but within four months, the facility should conduct and fully document a hazardous waste determination by having a representative sample of the wastestreams analyzed separately by a certified Florida laboratory for the following:

1. Process Area: Wastewater collected in the lift station potentially containing 2,4-D from irrigating the fields  
Toxicity Characteristic Leaching Procedure (TCLP) for:  
- RCRA herbicide 2,4-D, pursuant to 40 CFR 261.24, via method 8151.


2. Truck Bay: Wastewater from washing tractors  
TCLP for:  
- RCRA herbicide 2,4-D, pursuant to 40 CFR 261.24, via method 8151;  
- RCRA metals, pursuant to 40 CFR 261.24, via method 6010; and  
- RCRA volatiles, pursuant to 40 CFR 261.24, via method 8260.

3. Wash Pad: Wastewater from rinsing field equipment and trucks  
TCLP for:  
- RCRA herbicide 2,4-D, pursuant to 40 CFR 261.24, via method 8151;  
- RCRA metals, pursuant to 40 CFR 261.24, via method 6010; and  
- RCRA volatiles, pursuant to 40 CFR 261.24, via method 8260.


Documentation of the results of these waste determinations should be submitted to this office for review. These waste streams are not to be disposed of until written approval has been given by DEP. The wastes should be disposed of in a proper manner once written approval has been given by DEP. Hazardous waste should be sent off-site to a permitted treatment, storage, or disposal facility.

NOTE: None of the samples are to be composites. The samples are to be collected and analyzed in accordance with EPA publication SW# 846 "Test Methods for Evaluating Solid Waste" 3rd Edition. All sampling and analysis shall be conducted in accordance with Rule 62-160, Florida Administrative Code (FAC). A National Environmental Laboratory Accreditation Program (NELAP) certified laboratory should analyze the samples. Volatile samples should be held within 15 minutes of collection and maintained

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# Quality Assurance - Sampling



DEP-SOP-001/01  
FS 1000 General Sampling Procedures

**FS 1000. GENERAL SAMPLING PROCEDURES**

See also the following Standard Operating Procedures:

- FA 1000 and 2000 Administrative Procedures
- FC 1000 Cleaning/Decontamination Procedures
- FD 1000-9000 Documentation Procedures
- FM 1000 Field Planning and Mobilization
- FQ 1000 Field Quality Control Requirements



**FS 1006. Preservation, Holding Times and Container Types**

1. Preserve all samples according to the requirements specified in Tables FS 1000-4 through FS 1000-11.


1.1. The information listed in the above-referenced tables supersedes any preservation techniques, holding time or container type that might be discussed in individual analytical methods.

1.2. If samples are collected only for total phosphorus and are not for NPDES compliance, thermal preservation (ice) is not required if the sample containers are pre-preserved with acid.

2. The preservation procedures in the referenced tables specify immediate preservation. "Immediate" is defined as "within 15 minutes of sample collection." Perform all preservation on-site (in the field).

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# Lab Reports – Temperature?

CHAIN-OF-CUSTODY RECORD

Page 1 of 1

Item #	Sample ID (Field Identification)	Collection Date	Collection Time	Cont./Vols	Main (see notes)	Total # of Containers	Preservation (see notes) (Continue as necessary)	Sample Comments
1	Sample #1	3-3-21	0930	G	0	1	X X X	
2	Sample #2		0930	G	0	1	X X X	
3	Sample #3		0930	G	0	1	X X X	
4	Stripper #1		0930	G	0	1	X X X	
5	Leakdown		0930	G	0	1	X X X	
6	Stripper Perce		0930	G	0	1	X X X	
7	Parts Washer		0930	G	0	1	X X X X	

Total # of Containers: 7

Requested By: *Ryan Kim* Date/Time: 03-25-21 10:11

Received By: *[Signature]* Date/Time: 03-25-21 14:30

Temperature: 20.4°C

REJECTED!

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# Lab Reports – Temperature?

**CHAIN-OF-CUSTODY / Analytical Request Document**  
The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Section A: Requester Client Information  
Section B: Requested Project Information  
Section C: Invoice Information

Page: 1 of 1

**SAMPLE ID**  
One Character per box.  
(No 0's) - 1  
Sample IDs must be unique

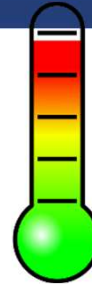
182072319A

**REJECTED!**

2/24 72418 0920 7 milk, 72418 0920 26.5 u X  
Blue ice packs X

TEMP in C

“Blue ice packs – warm”



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# Lab Reports – Temperature?

**Chain of Custody Record**

Client Information  
Site: 182072319A  
Site Address: 182072319A  
Requester: 182072319A  
Requester Phone: 182072319A  
Requester Email: 182072319A  
Requester Fax: 182072319A  
Requester Website: 182072319A  
Requester Other: 182072319A

Analyses Requested  
Sample ID: 182072319A  
Sample Date: 4-6-23  
Sample Time: 0925  
Sample Type: G  
Matrix: Solid  
Preservative Code: G

Analysis Requested:  
A. HCL  
B. NH3  
C. NH4  
D. NH4+  
E. NH4+  
F. NH4+  
G. NH4+  
H. NH4+  
I. NH4+  
J. NH4+  
K. NH4+  
L. NH4+  
M. NH4+  
N. NH4+  
O. NH4+  
P. NH4+  
Q. NH4+  
R. NH4+  
S. NH4+  
T. NH4+  
U. NH4+  
V. NH4+  
W. NH4+  
X. NH4+  
Y. NH4+  
Z. NH4+  
AA. NH4+  
AB. NH4+  
AC. NH4+  
AD. NH4+  
AE. NH4+  
AF. NH4+  
AG. NH4+  
AH. NH4+  
AI. NH4+  
AJ. NH4+  
AK. NH4+  
AL. NH4+  
AM. NH4+  
AN. NH4+  
AO. NH4+  
AP. NH4+  
AQ. NH4+  
AR. NH4+  
AS. NH4+  
AT. NH4+  
AU. NH4+  
AV. NH4+  
AW. NH4+  
AX. NH4+  
AY. NH4+  
AZ. NH4+  
BA. NH4+  
BB. NH4+  
BC. NH4+  
BD. NH4+  
BE. NH4+  
BF. NH4+  
BG. NH4+  
BH. NH4+  
BI. NH4+  
BJ. NH4+  
BK. NH4+  
BL. NH4+  
BM. NH4+  
BN. NH4+  
BO. NH4+  
BP. NH4+  
BQ. NH4+  
BR. NH4+  
BS. NH4+  
BT. NH4+  
BU. NH4+  
BV. NH4+  
BW. NH4+  
BX. NH4+  
BY. NH4+  
BZ. NH4+  
CA. NH4+  
CB. NH4+  
CC. NH4+  
CD. NH4+  
CE. NH4+  
CF. NH4+  
CG. NH4+  
CH. NH4+  
CI. NH4+  
CJ. NH4+  
CK. NH4+  
CL. NH4+  
CM. NH4+  
CN. NH4+  
CO. NH4+  
CP. NH4+  
CQ. NH4+  
CR. NH4+  
CS. NH4+  
CT. NH4+  
CU. NH4+  
CV. NH4+  
CW. NH4+  
CX. NH4+  
CY. NH4+  
CZ. NH4+  
DA. NH4+  
DB. NH4+  
DC. NH4+  
DD. NH4+  
DE. NH4+  
DF. NH4+  
DG. NH4+  
DH. NH4+  
DI. NH4+  
DJ. NH4+  
DK. NH4+  
DL. NH4+  
DM. NH4+  
DN. NH4+  
DO. NH4+  
DP. NH4+  
DQ. NH4+  
DR. NH4+  
DS. NH4+  
DT. NH4+  
DU. NH4+  
DV. NH4+  
DW. NH4+  
DX. NH4+  
DY. NH4+  
DZ. NH4+  
EA. NH4+  
EB. NH4+  
EC. NH4+  
ED. NH4+  
EE. NH4+  
EF. NH4+  
EG. NH4+  
EH. NH4+  
EI. NH4+  
EJ. NH4+  
EK. NH4+  
EL. NH4+  
EM. NH4+  
EN. NH4+  
EO. NH4+  
EP. NH4+  
EQ. NH4+  
ER. NH4+  
ES. NH4+  
ET. NH4+  
EU. NH4+  
EV. NH4+  
EW. NH4+  
EX. NH4+  
EY. NH4+  
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FI. NH4+  
FJ. NH4+  
FK. NH4+  
FL. NH4+  
FM. NH4+  
FN. NH4+  
FO. NH4+  
FP. NH4+  
FQ. NH4+  
FR. NH4+  
FS. NH4+  
FT. NH4+  
FU. NH4+  
FV. NH4+  
FW. NH4+  
FX. NH4+  
FY. NH4+  
FZ. NH4+  
GA. NH4+  
GB. NH4+  
GC. NH4+  
GD. NH4+  
GE. NH4+  
GF. NH4+  
GG. NH4+  
GH. NH4+  
GI. NH4+  
GJ. NH4+  
GK. NH4+  
GL. NH4+  
GM. NH4+  
GN. NH4+  
GO. NH4+  
GP. NH4+  
GQ. NH4+  
GR. NH4+  
GS. NH4+  
GT. NH4+  
GU. NH4+  
GV. NH4+  
GW. NH4+  
GX. NH4+  
GY. NH4+  
GZ. NH4+  
HA. NH4+  
HB. NH4+  
HC. NH4+  
HD. NH4+  
HE. NH4+  
HF. NH4+  
HG. NH4+  
HH. NH4+  
HI. NH4+  
HJ. NH4+  
HK. NH4+  
HL. NH4+  
HM. NH4+  
HN. NH4+  
HO. NH4+  
HP. NH4+  
HQ. NH4+  
HR. NH4+  
HS. NH4+  
HT. NH4+  
HU. NH4+  
HV. NH4+  
HW. NH4+  
HX. NH4+  
HY. NH4+  
HZ. NH4+  
IA. NH4+  
IB. NH4+  
IC. NH4+  
ID. NH4+  
IE. NH4+  
IF. NH4+  
IG. NH4+  
IH. NH4+  
II. NH4+  
IJ. NH4+  
IK. NH4+  
IL. NH4+  
IM. NH4+  
IN. NH4+  
IO. NH4+  
IP. NH4+  
IQ. NH4+  
IR. NH4+  
IS. NH4+  
IT. NH4+  
IU. NH4+  
IV. NH4+  
IW. NH4+  
IX. NH4+  
IY. NH4+  
IZ. NH4+  
JA. NH4+  
JB. NH4+  
JC. NH4+  
JD. NH4+  
JE. NH4+  
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ZU. NH4+  
ZV. NH4+  
ZW. NH4+  
ZX. NH4+  
ZY. NH4+  
ZZ. NH4+

**ACCEPTED!**


670-7806 Chain of Custody

Special Instructions/Requirements:  
Sample (s) may be assessed if samples are retained longer than 9 months  
Returned to Client: [ ]  
Disposed by Lab: [ ]  
Analysis For: [ ]  
Months: [ ]

Requested by: [ ]  
Requested Date: 4/6/23  
Requested Time: 1100  
Requested Location: [ ]  
Requested by: [ ]  
Requested Date: 4/7/23  
Requested Time: 0800  
Requested Location: [ ]




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## Lab Reports – FL Certified Lab?

[Chapter 403, FS; 62-160.300, FAC]



**ANALYTE QUALIFIERS**

1d Insufficient sample volume provided by the client to re-analyze


2d Sample was analyzed at a dilution due to sample matrix

H3 Sample was received or analysis requested beyond the method's

M1 Matrix spike recovery exceeded QC limits. Batch acceptance


S3 Surrogate recovery exceeded laboratory control limits. Analyte

S5 Surrogate recovery outside control limits due to matrix interference



Pace Analytical Services, LLC  
7726 Moller Road  
Indianapolis, IN 46268  
(317)228-3100  
Page 2 of 2

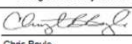
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Reviewed by:   
Chris Boyle  
(317)228-3100  
chris.boyle@pacelabs.com

**New Orleans Certification IDs**  
California Env. Lab Accreditation Program Branch: 11277CA  
Florida Department of Health (NELAC): E87595  
Illinois Environmental Protection Agency: 0025721  
Kansas Department of Health and Environment (NELAC): E-10206  
Louisiana Dept. of Environmental Quality (NELAC/LELAP): 02006

Pennsylvania Dept. of Env Protection (NELAC): 08-04202  
Texas Commission on Env. Quality (NELAC): T104704405-00-7X  
U.S. Dept. of Agriculture Foreign Soil Import: P330-10-00119  
Commonwealth of Virginia (TN): 480246


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**Indiana Certification IDs**  
7726 Moller Road, Indianapolis, IN 46268  
Illinois Certification #: 003071  
Indiana Certification #: C-49-06  
Kansas NELAP Certification #: E-10177  
Kentucky UST Certification #: 60226  
Kentucky WW Certification #: 98019

Ohio VAP Certification #: CL-0095  
Oklahoma Certification #: 2016-075  
Texas Certification #: T104704395-16-10  
West Virginia Certification #: 330  
Wisconsin Certification #: 999788130  
USDA Soil Permit #: P330-15-00257

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## Lab Reports – TCLP?

Project: TCLP Characterization


Pace Project No.: 50201765

Sample: 132072318      Lab ID: 50201765001      Collected: 07/23/18 08:00      Matrix: Solid

Results reported on a "wet-weight" basis


Method	Parameters	Results	Units	Report Limit	Analyzed	Qualifiers
EPA 6010	Arsenic	ND	mg/L	0.20	07/31/18 17:11	
EPA 6010	Barium	ND	mg/L	2.0	07/31/18 17:11	
EPA 6010	Cadmium	ND	mg/L	0.10	07/31/18 17:11	
EPA 6010	Chromium	ND	mg/L	0.20	07/31/18 17:11	
EPA 6010	Lead	ND	mg/L	0.20	07/31/18 17:11	
EPA 6010	Selenium	ND	mg/L	0.20	07/31/18 17:11	
EPA 6010	Silver	ND	mg/L	0.20	07/31/18 17:11	
EPA 7470	Mercury	ND	mg/L	0.00020	07/31/18 14:40	
EPA 8270	1,4-Dichlorobenzene	ND	mg/L	0.10	07/31/18 20:17	

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## Lab Reports – Results OK, Right?

Sample Description:		Location:				
Parameters	Results	Qual	Units	DF	Adjusted PQL	Adj
<b>VOLATILES, TCLP</b>						
Analysis Desc: 1311/8260B Analysis, TCLP		Preparation Method: SW-846 5030B				
		Analytical Method: SW-846 8260B				
1,1-Dichloroethylene	0.90	U	mg/L	5000	5.0	
1,2-Dichloroethane	1.2	U	mg/L	5000	5.0	
1,4-Dichlorobenzene	1.1	U	mg/L	5000	5.0	
2-Butanone (MEK)	2.2	U	mg/L	5000	25	
Benzene	0.80	U	mg/L	5000	5.0	
Carbon Tetrachloride	1.8	U	mg/L	5000	5.0	
Chlorobenzene	1.0	U	mg/L	5000	5.0	
Chloroform	0.92	U	mg/L	5000	5.0	
Tetrachloroethylene (PCE)	1.8	U	mg/L	5000	5.0	
Trichloroethene	1.4	U	mg/L	5000	5.0	
Vinyl Chloride	1.0	U	mg/L	5000	5.0	




TCLP Volatiles		
Benzene	0.5	D018
Carbon Tetrachloride	0.5	D019
Chlorobenzene	100.0	D021
Chloroform	6.0	D022
1,4-Dichlorobenzene	7.5	D027
1,2-Dichloroethane	0.5	D028
1,1-Dichloroethylene	0.7	D029
Methyl Ethyl Ketone	200.0	D035
Tetrachloroethylene	0.7	D039
Trichloroethylene	0.5	D040
Vinyl Chloride	0.2	D043

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## Lab Reports – Results OK, Right?

Sample Description:		Location:						
Parameters	Results	Qual	Units	DF	Adjusted PQL	Adjusted MDL	Analyzed	Lab
<b>SEMIVOLATILES, TCLP</b>								
Analysis Desc: 1311/8270C Analysis, TCLP		Preparation Method: SW-846 3510C						
		Analytical Method: SW-846 8270C						
1,4-Dichlorobenzene	180	U	mg/L	100	450	180	10/26/2020 18:26	
2,4,5-Trichlorophenol	120	U	mg/L	100	450	120	10/26/2020 18:26	
2,4,6-Trichlorophenol	130	U	mg/L	100	450	130	10/26/2020 18:26	
2,4-Dinitrotoluene (2,4-DNT)	170	U	mg/L	100	450	170	10/26/2020 18:26	
2-Methylphenol (o-Cresol)	130	U	mg/L	100	450	130	10/26/2020 18:26	
3+4-Methylphenol(mp-Cresol)	91	U	mg/L	100	450	91	10/26/2020 18:26	
Hexachlorobenzene	89	U	mg/L	100	450	89	10/26/2020 18:26	
Hexachlorobutadiene	110	U	mg/L	100	450	110	10/26/2020 18:26	
Hexachloroethane	110	U	mg/L	100	450	110	10/26/2020 18:26	
Nitrobenzene	100	U	mg/L	100	450	100	10/26/2020 18:26	
Pentachlorophenol	86	U	mg/L	100	450	86	10/26/2020 18:26	
Pyridine	110	U	mg/L	100	450	110	10/26/2020 18:26	



TCLP Semivolatiles	
o-Cresol	200.0
m-Cresol	200.0
p-Cresol	200.0
Cresol	200.0
2,4-Dinitrotoluene	0.13
Hexachlorobenzene	0.13
Hexachlorobutadiene	0.5
Hexachloroethane	3.0
Nitrobenzene	2.0
Pentachlorophenol	100.0
Pyridine	5.0
2,4,5-Trichlorophenol	400.0
2,4,6-Trichlorophenol	2.0

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# Waste Determination Documentation

[40 CFR 262.11(f)]

STEP FIVE – separate presentation available upon request.

## STEP SIX

(f) **Recordkeeping for small and large quantity generators.** A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste, as defined by 40 CFR 261.3.

Records must be maintained for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal. These records must comprise the generator's knowledge of the waste and support the generator's determination, as described at paragraphs (c) and (d) of this section.

The records **must include**, but are not limited to, the following types of information: The results of any tests, sampling, waste analyses or other determinations made in accordance with this section; records documenting the tests, sampling, and analytical methods used to demonstrate the validity and relevance of such tests; records consulted in order to determine the process by which the waste was generated, the composition of the waste and the properties of the waste; and records which explain the knowledge basis for the generator's determination, as described at paragraph (d)(1) of this section.

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# Waste Determination Documentation – Waste Profile Forms

US ecology WASTE PROFILE FORM

Profile Tracking # \_\_\_\_\_

Waste Stream Characterization Form

HAZARDOUS WASTE PROFILE

Section 1 – Generator & Customer Information

Section 2 – Shipping & Packaging Information

Section 3 – Special Properties

Waste description (including chemical/physical description):

Process generating the waste:

Waste determination based on:

Is the waste a "solid waste" according to 261.2?

Is the waste excluded under 261.4 or exempt from regulation as a hazardous waste?

Is the waste a listed hazardous waste? (Detail rationale, as necessary)

Is the waste a characteristic hazardous waste? (Detail rationale, as necessary)

Metals:

Is the waste PCB-contaminated?

RCRA waste determination:

HAZARDOUS WASTE PROFILE

MUST be completed prior to acceptance of waste by RPR Environmental.

MOE Generator Registration No. \_\_\_\_\_

Phone: \_\_\_\_\_ Ext: \_\_\_\_\_ Fax: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Country: \_\_\_\_\_

Invoking Company: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Country: \_\_\_\_\_

Invoking Contact: \_\_\_\_\_

Phone: \_\_\_\_\_

Technical Contact: \_\_\_\_\_

Phone: \_\_\_\_\_

Call Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: \_\_\_\_\_

b) Frequency:  One Time  Month  Year  Other: \_\_\_\_\_

2.2) DOT Information:

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material?

b) If "yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Material Table:

3.1) Color: \_\_\_\_\_

3.2) Odor:  None  Ammonia  Amines  Mercaptans  Sulfur  Organic Acid  Other: \_\_\_\_\_

3.3) Consistency at 70°F:  Solid  Dust/Powder  Debris  Sludge  Liquid

3.4) What is the pH?  <2  2-14.9  6-10  10.1-12.4  >12

3.5) What is the flash point?  <90°F  90-130°F  140-190°F  >190°F

HAZARDOUS WASTE PROFILE

Waste Number: \_\_\_\_\_

Waste Description: \_\_\_\_\_

Subsidiary Hazard Class: \_\_\_\_\_

blended into drums

Size Materials  Spent  Off-Spec Product

Provide MSDS's or analytical data if available. Check box if MSDS provided

Hydrocarbons/Composites \_\_\_\_\_ % Chemicals/Composites \_\_\_\_\_ %


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## Waste Determination: A Waste Profile Example

**Example of a Waste Profile for liquid waste Carboline Thinner, Zinc Chromate Primer, Carboline Thermaline Aluminum paint.**

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Safety Data Sheet  
prepared to UN GHS Revision 3

**1. Identification of the Substance/Mixture and the Company/Undertaking**

1.1 Product Identifier: 0522S1NL  
Product Name: THINNER 2  
Revision Date: 06/01/2018

**3. Composition/Information On Ingredients**

3.2 Mixtures

**Hazardous Ingredients**

CAS-No.	Chemical Name	%
108-88-3	TOLUENE	75-100
78-93-3	METHYLETHYL KETONE	10-25


**9.1 Information on basic physical and chemical properties**


Appearance:	Clear Liquid
Physical State	Liquid
Odor	Solvent
Odor threshold	N/D
pH	N/D
Melting point / freezing point (°C)	N/D
Boiling point/range (°C)	173 F (78 C) - 232 F (111 C)
Flash Point, (°C)	-4

**Liquids:**  
**D001/F005/D035**

**Solids, dry:**  
**F005/D035**

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“Our Coatings Fly All Over the World”

DATE ISSUED : 6/7/2018  
SDS REF. No : 200Y02

**SAFETY DATA SHEET (SDS)**

TT-P-1757B Ty. I Cl. C Yellow Zinc Chromate Primer

**1. PRODUCT AND COMPANY INFORMATION**

PRODUCT NAME: TT-P-1757B Ty. I Cl. C Yellow Zinc Chromate Primer  
PRODUCT CODE: 200Y02

**3. COMPOSITION/CHEMICAL INFORMATION**

Chemical Name	CAS Number	Weight %
*Zinc Chromate (Zn CrO4)	13530-65-9	20% to 25%
*Xylenes, Mixed Isomers	1330-20-7	15% to 20%
Phenol formaldehyde polymer	9003-35-4	15% to 20%
Acetone	67-64-1	5% to 10%
Limestone	1317-65-3	5% to 10%
Barium Sulfate	7727-43-7	1% to 5%
Silicon dioxide, chemically prepared	112045-59-2	

**Liquids:**  
**D001/D005/D007**

**Solids:**  
**D005/D007**


**5. FIRE FIGHTING MEASURES**


**FLASH POINT AND METHOD :** 54 degrees Fahrenheit Tagliabue Closed Cup (TCC)

**FLAMMABLE LIMITS :** 0.0% to 12.8%

**AUTOIGNITION TEMPERATURE :** No data available.

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**Safety Data Sheet**  
prepared to UN GHS Revision 3

**1. Identification of the Substance/Mixture and the Company/Undertaking**

1.1 Product Identifier: 4704S1NL

Product Name: THERMALINE 4700 VOC ALUMINUM  
Monocomponent Industrial

Revision Date: 06/04/2015

Supersedes Date: New SDS

**3. Composition/Information On Ingredients**

3.2 Mixtures

Hazardous Ingredients

CAS-No.	Chemical Name	%
98-56-6	PARACHLOROBENZO TRIFLUORIDE	25-50
14808-60-7	MICROCRYSTALLINE SILICA	10-25
7429-90-5	ALUMINUM (DUST OR FUME)	10-25
64742-95-6	AROMATIC HYDROCARBON	2.5-10
108-88-3	TOLUENE	1.0-2.5
108-03-2	1-NITROPROPANE	1.0-2.5
108-38-3	META-XYLENE	1.0-2.5
100-41-4	ETHYL BENZENE	0.1-1.0

**Liquids:**  
**D001**  
**(22°C = 71.6°F)**

**Solids:**  
**Non-hazardous**

**9. Physical and Chemical Properties**

9.1 Information on basic physical and chemical properties

Appearance: Viscous Aluminum Colored

Physical State: Liquid

Odor: Solvent

Odor threshold:

pH: N/D


Melting point / freezing point (°C): N/D

Boiling point/range (°C): 149 F (65 C) - 334 F (168 C)

Flash Point (°C): 22

These solvents are *ingredients* in the paint.

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### WASTESTREAM IDENTIFICATION DOCUMENT THINNER / PRIMER / PAINT

<b>Generator Facility Name, Location and EPA ID#:</b>  Cheryl's Auto Body & Repair Emporium 1880 Riverfront Road Any City, USA 12345-0000  ID# FLO 000 123 456	<b>Point of Contact for Wastestream Profile:</b>  Name: Cheryl Mitchell Shop/Area: Blast Shop Phone: 904-123-4567 Email: cheryl.l.mitchell@emporiums.r.us
--	--

Shop(s) / Area(s) where wastestream is generated: **Painting bays.**

**WASTESTREAM DESCRIPTION**

Liquid   
  Solid   
  Sludge/Slurry   
  Other (describe)


Is the wastestream an unused hazardous material (HM)?     Yes     No  
 (If yes, list the unused HM and attach SDS):

Is this wastestream generated from an operational process?     Yes     No  
 (If yes, provide the following information.)

What is the process?  
**Spot clean vehicles w/thinner, apply primer and paint to vehicles / vehicle parts. Shop rags are used to clean surfaces prior to priming/painting, thinner is used to clean paint guns.**

What raw materials / hazardous materials are used during the process?    SDSs attached.  
**Carboline Thinner 2**  
**P1757 Yellow Zinc Chromate Primer**  
**Thermaline 4700 VOC Aluminum Paint**

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Describe the wastestream at the end of the process (i.e., oily rags, liquid paint debris, solid paint debris, abrasive garnet blast media, liquid solvents, etc.).  
**Waste thinner, primer, paint.**

**WASTESTREAM CHARACTERIZATION**

Based on **Generator Knowledge** as determined by the information above, and / or a review of applicable analytical results (attached lab report), the **Generator** determines that this wastestream be classified as:  
 Hazardous Waste   
  Non-Hazardous Waste   
  Universal Waste

If Hazardous Waste is checked, list **all** applicable EPA Waste Codes below:  
**Carboline: D001 (ignitable); D035 (MEK); F005 (toluene & MEK).**  
**Primer: D001 (ignitable); D005 (barium), D007 (chromium).**  
**Paint: D001 (ignitable).**

**NOTE: These waste codes must be on the HW container prior to shipment off-site.**

**METHOD OF ACCUMULATION AND ESTIMATED VOLUME**

a. Method of accumulation for disposal / shipment:  
 Drum   
  Bucket   
  Triwall   
  Tanker   
  Roll-off   
  Other (explain): \_\_\_\_\_


b. Estimated generation volume (in pounds) and frequency (monthly, bi-monthly, quarterly, annually):  
**55-gallon drum (~400#) every 8-12 months.**

WASTESTREAM COMPOSITION	
COMPONENTS	PERCENTAGE OF WASTESTREAM
Thinner, primer, paint	100%

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# Waste Determination – Waste Profile Package



Safety Data Sheet  
Prepared in Accordance with HCS 20  
C.F.R. 1910.1200

SAFETY DATA SHEET (SDS)



Coatings Fly All Over the World!

TT-P-1757B Ty. I Cl. C Yellow Zinc Chromate Primer

PRODUCT AND COMPANY INFORMATION

PRODUCT NAME: TT-P-1757B Ty. I Cl. C Yellow Zinc Chromate Primer  
PRODUCT CODE: 200Y02

MANUFACTURER INFORMATION  
24 HR. EMERGENCY CONTACT  
CHEMTEC (US TRADING)  
2 East Beaver Creek Drive  
Phoenix, AZ 85034  
Phone: (602)243-3293  
Fax: (602)240-4501  
Web: Robert O. Commisso

HAZARD IDENTIFICATION

GHS07  
GHS09  
GHS12  
GHS13  
GHS14  
GHS15  
GHS16  
GHS17  
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GHS100

ANALYTICAL REPORT

Environment Testing

PREPARED FOR

Generated: 3/20/2025 9:40:21 AM

JOB DESCRIPTION

TCLP Metals -

JOB NUMBER

Product Details  
401 Hemlockport Avenue  
Altamonte Springs, FL 32701  
See page two for job notes and contact information  
Page 1 of 15  
EOL

WASTESTREAM IDENTIFICATION DOCUMENT  
THINNER / PRIMER / PAINT

Generator Facility Name, Location and EPA ID#:	Point of Contact for Wastestream Profile
Cheryl's Auto Body & Repair Emporium 1800 Riverfront Road Any City, USA 12345-0000	Name: Cheryl Mitchell Shop/Area: Blast Shop Phone: 904-123-4567 Email: cheryl.mitchell@emporiums.us
ID# FLO 000 123 456	

Shop(s) / Area(s) where wastestream is generated: Painting bays.

**WASTESTREAM DESCRIPTION**

Liquid    Solid    Sludge/Slurry    Other (describe)


Is the wastestream an unused hazardous material (HM)?   Yes    No   
(If yes, list the unused HM and attach SDS)

Is this wastestream generated from an operational process?   Yes    No   
(If yes, provide the following information)

What is the process?  
Spot clean vehicles with thinner, apply primer and paint to vehicles / vehicle parts. Shop rags are used to clean surfaces prior to priming/painting, thinner is used to clean paint guns.

What raw materials / hazardous materials are used during the process?   SDSs attached  
Carboline Thinner 2  
P1757 Yellow Zinc Chromate Primer  
Thermaline 4700 VOC Aluminum Paint

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# Waste Determination

[40 CFR 262.11(g)]

## STEP SEVEN

***(g) Identifying hazardous waste numbers for small and large quantity generators.***

**If the waste is determined to be hazardous, small quantity *generators* and large quantity *generators* must identify all applicable EPA hazardous waste numbers (EPA hazardous waste codes) in Subparts C and D of Part 261 of this chapter. Prior to shipping the waste off site, the *generator* also must mark its containers with all applicable EPA hazardous waste numbers [EPA hazardous waste codes] according to 40 CFR 262.32.**

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## Remember...

[40 CFR 262.11(f)]

**(f) Recordkeeping for small and large quantity generators. A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste, as defined by 40 CFR 261.3.**

**Records must be maintained for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal. These records must comprise the generator's knowledge of the waste and support the generator's determination, as described at paragraphs (c) and (d) of this section.**

**The records must include, but are not limited to, the following types of information: The results of any tests, sampling, waste analyses or other determinations made in accordance with this section; records documenting the tests, sampling, and analytical methods used to demonstrate the validity and relevance of such tests; records consulted in order to determine the process by which the waste was generated, the composition of the waste and the properties of the waste; and records which explain the knowledge basis for the generator's determination, as described at paragraph (d)(1) of this section.**

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# THANK YOU

**Cheryl Mitchell**

Hazardous Waste Program

Northeast District Office

Florida Department of Environmental Protection

Contact Information:

(904)-256-1700

Cheryl.L.Mitchell@FloridaDEP.gov

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