1

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)].

2

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.

3

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.

4

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.

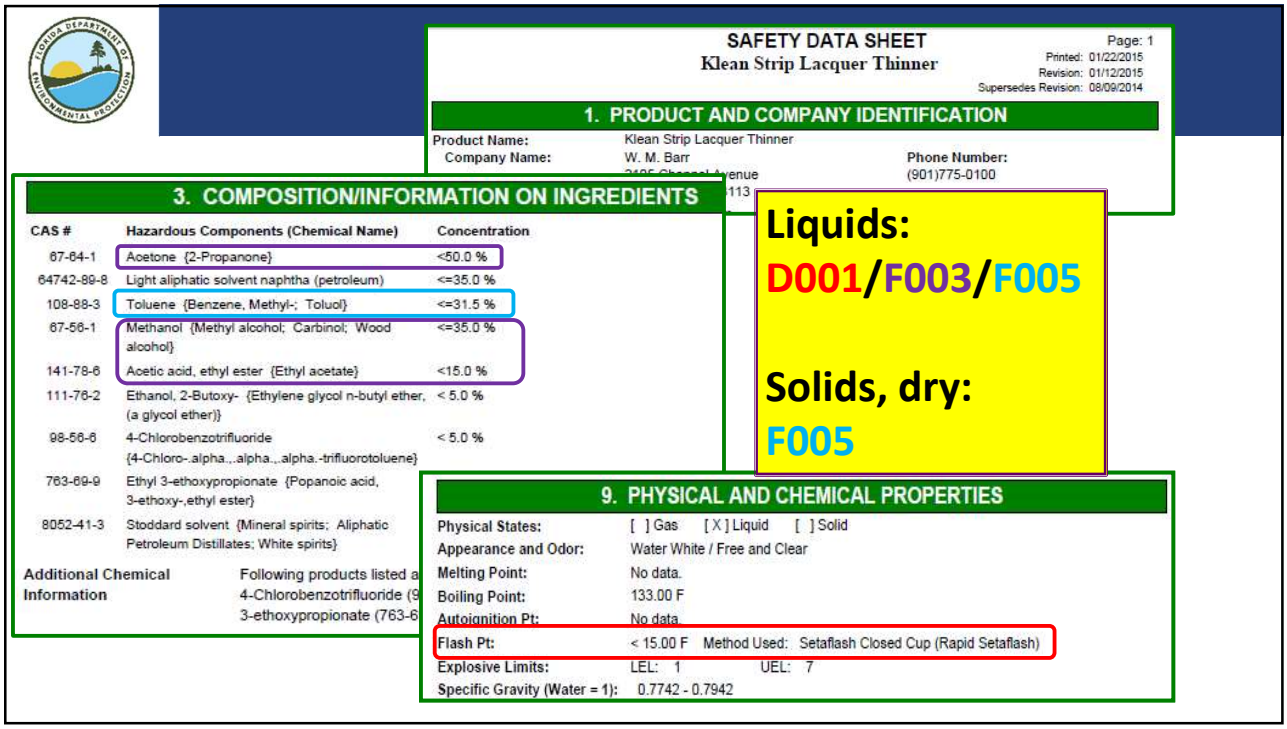
261.33 - Commercial Chemicals (**P and U codes**): unused, off-spec, technical grade chemicals that are going to be discarded.

5

Waste Determination – Listed Example

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

6



SAFETY DATA SHEET
Klean Strip Lacquer Thinner

Page: 1
Printed: 01/22/2015
Revision: 01/12/2015
Supersedes Revision: 08/09/2014

1. PRODUCT AND COMPANY IDENTIFICATION

Product Name: Klean Strip Lacquer Thinner
Company Name: W. M. Barr
Phone Number: (901)775-0100

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 %
111-76-2	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 {Popanoic acid, 3-ethoxy-,ethyl ester}	
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	

Additional Chemical Information: Following products listed a
4-Chlorobenzotrifluoride (9
3-ethoxypropionate (763-6

Liquids:
D001/F003/F005

Solids, dry:
F005

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical States: [ ] Gas [X] Liquid [ ] 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

7

Waste Determination – Characteristic?

[40 CFR 262.11(d)]

STEP FOUR

(d) The person <u>then</u> must <u>also</u> determine whether the waste exhibits one or more <u>hazardous characteristics as identified in 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.

8

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.

9

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.

10

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

11

SAFETY DATA SHEET (SDS)

Intrepid Coatings

"Our Coatings Fly All Over the World"

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

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

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	112945-52	

Liquids:
D001/D005/D007

Solids:
D005/D007

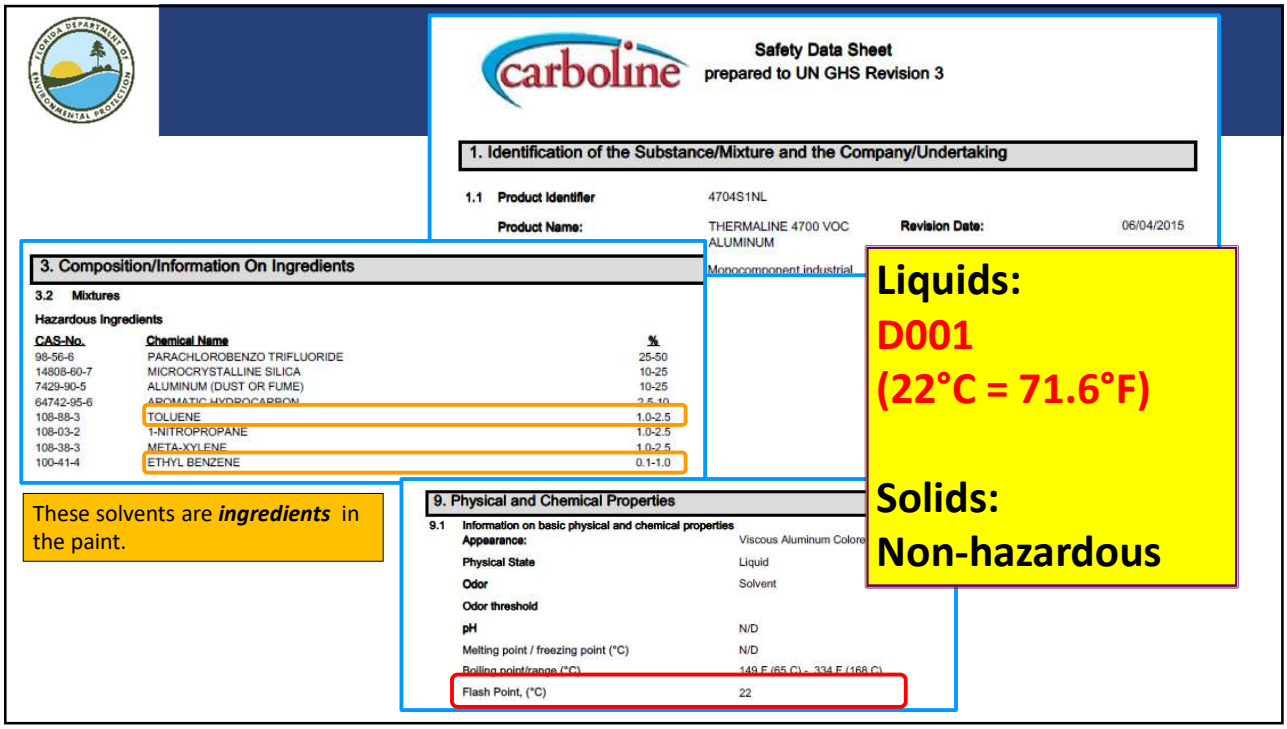
5. FIRE FIGHTING MEASURES

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

FLAMMABLE LIMITS : 0.0% to 12.8%

AUTOIGNITION TEMPERATURE : No data available.

12



13

Waste Determination – Characteristic Testing

[40 CFR 262.11(d)(2)]

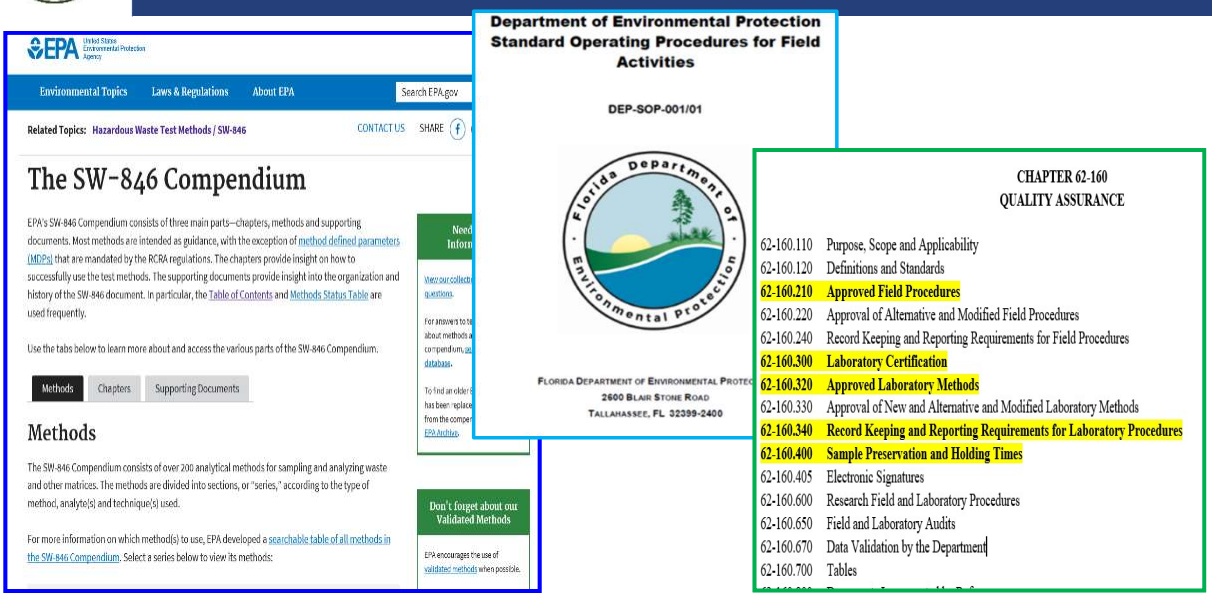
"(d)(2) When available knowledge is inadequate to make an accurate determination, the person must test the waste according to the applicable methods set forth in Subpart C of 40 CFR Part 261 [Ignitability, Corrosivity, Reactivity, Toxicity] or according to an equivalent method approved by the administrator,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

14

EPA and DEP Sampling Criteria



15

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.**

16

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.

17

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.

18

Quality Assurance - Sampling

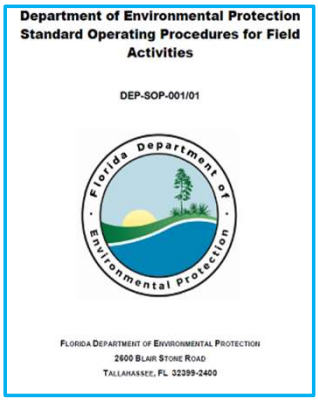
[62-160, Florida Administrative Code (FAC)]

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



Department of Environmental Protection
Standard Operating Procedures for Field Activities

DEP-SOP-001/01

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

19

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 iced within 15 minutes of collection and maintained

20

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.

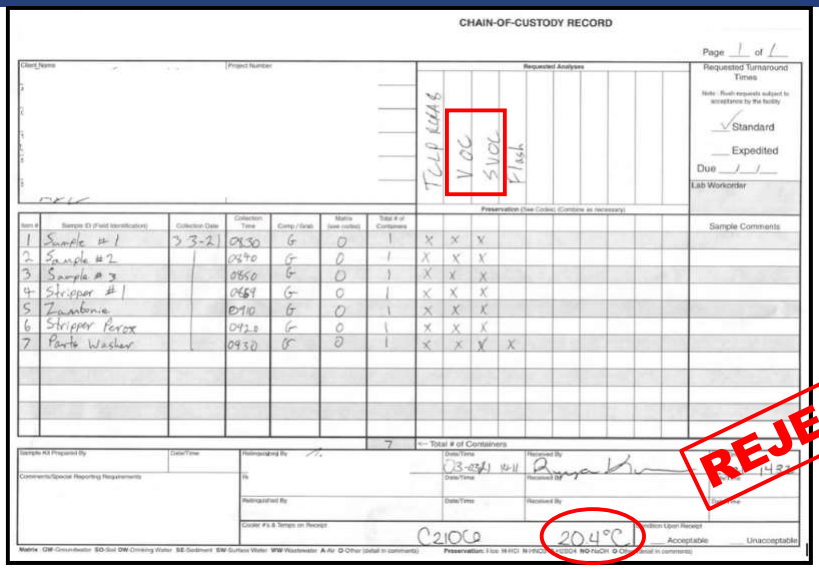
1.1. The information listed in the above-referenced tables supersedes any preservation techniques, holding time or container type that might be discussed in individual analytical methods.

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).

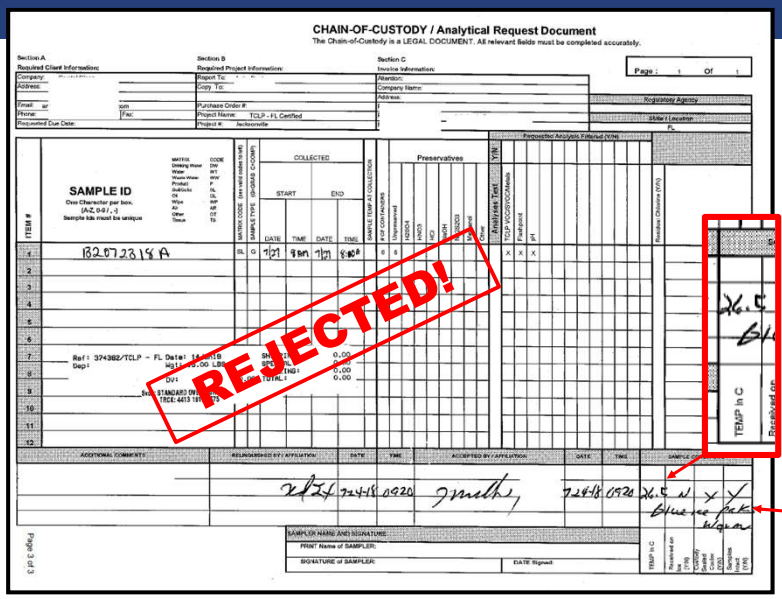
21

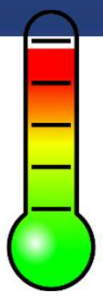
Lab Reports – Temperature?



22

Lab Reports – Temperature?

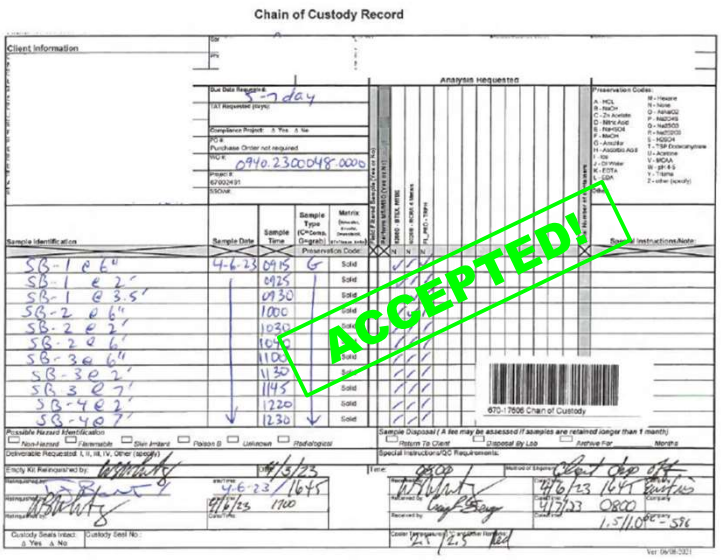




"Blue ice packs – warm"

23

Lab Reports – Temperature?



24

Lab Reports – FL Certified Lab?

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

Pace Analytical
www.pacelabs.com

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

Page 2 of 2

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-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP):
Pennsylvania Dept. of Env Protection (NELAC): 68-04202
Texas Commission on Env. Quality (NELAC): T104704405-09-TX
U.S. Dept. of Agriculture Foreign Soil Import: P330-10-00119
Commonwealth of Virginia (TNI): 480246

Pace Analytical
www.pacelabs.com

ANALYTE QUALIFIERS

1d	Insufficient sample volume provided by the client to re-an
2d	Sample was analyzed at a dilution due to sample matrix
H3	Sample was received or analysis requested beyond the
M1	Matrix spike recovery exceeded QC limits. Batch accept
S3	Surrogate recovery exceeded laboratory control limits. Ar
S5	Surrogate recovery outside control limits due to matrix in

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

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 #: 80226
Kentucky WW Certification #:98019
Ohio VAP Certification #: CL-0065
Oklahoma Certification #: 2016-075
Texas Certification #: T104704355-16-10
West Virginia Certification #: 330
Wisconsin Certification #: 999788130
USDA Soil Permit #: P330-16-00257

25

Lab Reports – TCLP?

Project: TCLP Characterization
Pace Project No.: 50201765

Sample: 132072318 Lab ID: 50201765001 Collected: 07/23/18 06:00 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	

26

Lab Reports – Results OK, Right?

Sample Description: Location:

Parameters	Results	Qual	Units	DF	Adjusted PQL	Adj
VOLATILES, TCLP						
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		
Trichloroethene	1.4	U	mg/L	5000		
Vinyl Chloride	1.0	U	mg/L	5000		

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

27

Lab Reports – Results OK, Right?

Sample Description: Location:

Parameters	Results	Qual	Units	DF	Adjusted PQL	Adjusted MDL	Analyzed	Lab
SEMIVOLATILES, TCLP								
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 18:36	
2,4,5-Trichlorophenol	120	U	mg/L	100	450	120	10/	
2,4,6-Trichlorophenol	130	U	mg/L	100	450	130	10/	
2,4-Dinitrotoluene (2,4-DNT)	170	U	mg/L	100	450	170	10/	
2-Methylphenol (o-Cresol)	130	U	mg/L	100	450	130	10/	
3+4-Methylphenol(mp-Cresol)	91	U	mg/L	100	450	91	10/	
Hexachlorobenzene	89	U	mg/L	100	450	89	10/	
Hexachlorobutadiene	110	U	mg/L	100	450	110	10/	
Hexachloroethane	110	U	mg/L	100	450	110	10/	
Nitrobenzene	100	U	mg/L	100	450	100	10/	
Pentachlorophenol	86	U	mg/L	100	450	86	10/	
Pyridine	110	U	mg/L	100	450	110	10/	

TCLP Sem	
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

28

Waste Determination Documentation

[40 CFR 262.11(f)]

STEP FIVE – separate presentation available upon request.

STEP SIX

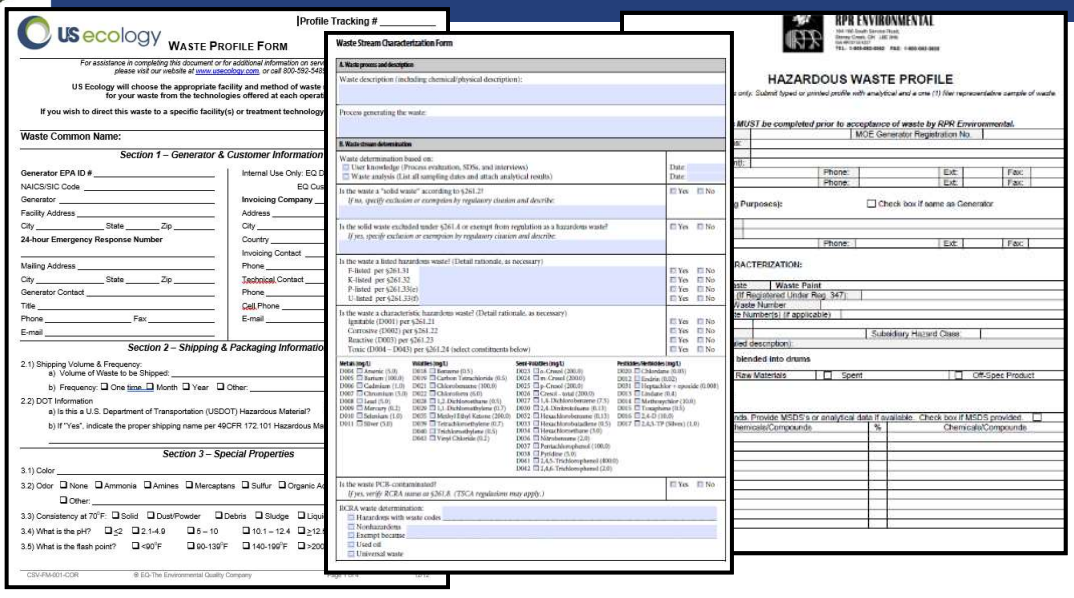
(f) ***Recordkeeping for small and large quantity generators.*** **A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste, as defined by 40 CFR 261.3.**

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.

29

Waste Determination Documentation – Waste Profile Forms



30

Waste Determination: A Waste Profile Example

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

31

carboline
Coatings - Linings - Fireproofing

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	METHYL ETHYL KETONE	10-25

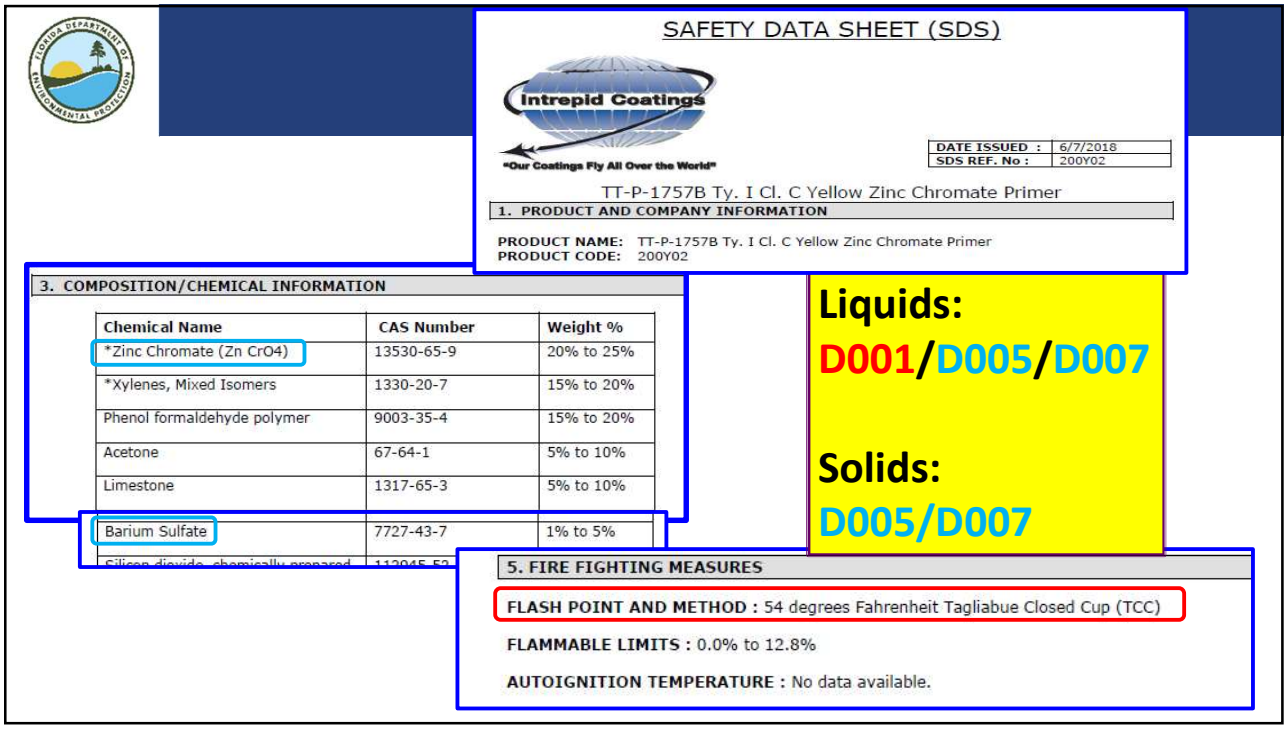
9.1 Information on basic physical and chemical properties

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

32



SAFETY DATA SHEET (SDS)

Intrepid Coatings
"Our Coatings Fly All Over the World"

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

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	112945-52-	

Liquids:
D001/D005/D007

Solids:
D005/D007

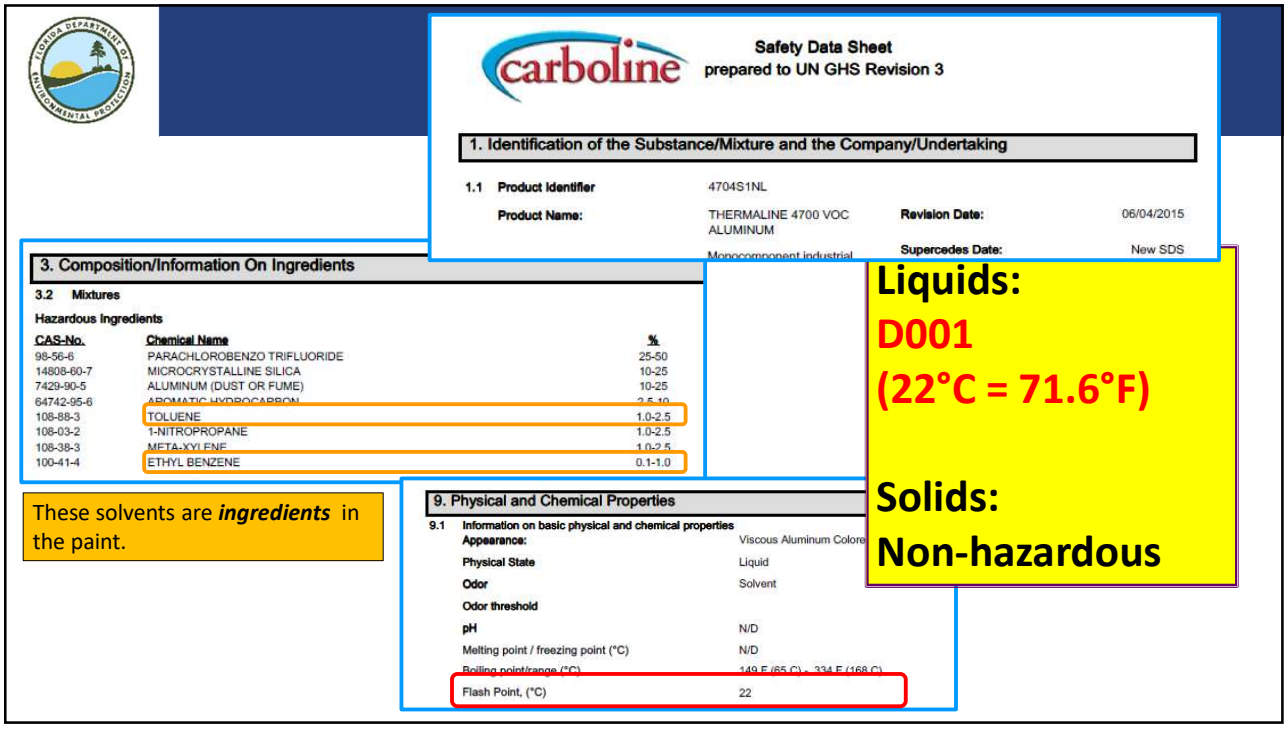
5. FIRE FIGHTING MEASURES

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

FLAMMABLE LIMITS : 0.0% to 12.8%

AUTOIGNITION TEMPERATURE : No data available.

33



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
Monocomponent industrial
Revision Date: 06/04/2015
Supercedes 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

These solvents are ***ingredients*** in the paint.

9. Physical and Chemical Properties

9.1 Information on basic physical and chemical properties

Appearance:	Viscous Aluminum Colore
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

34

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 ***1880 Riverfront Road*** ***Any City, USA 12345-0000*** ***ID# FL0 000 123 456***	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

35

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):

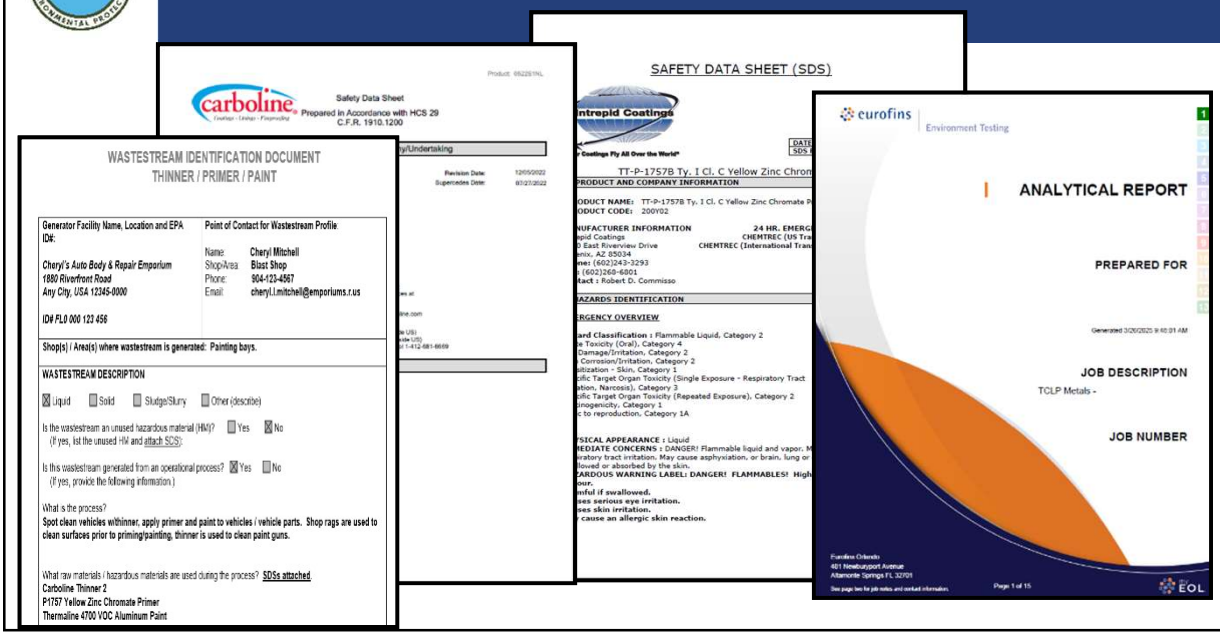
b. Estimated generation volume (in pounds) and frequency (monthly, bi-monthly, quarterly, annually):
55-gallon drum (~400#) every 8-12 months.

WASTESTREAM COMPOSITION

COMPONENTS	PERCENTAGE OF WASTESTREAM
Thinner, primer, paint	100%

36

Waste Determination – Waste Profile *Package*



37

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.

38

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.

39

40