

Waste Profile Form Instructions

Introduction

This guidance document was prepared to assist customers in completing the US Ecology (USE) Waste Profile Form. The Waste Profile Form and its supplements provide US Ecology the necessary information to safely and compliantly manage our customers waste. Complete and thorough information on the forms expedites the approval process. A current copy of the form is available from a US Ecology's Customer Service Representative or in electronic form from US Ecology's website at (www.usecology.com). For specific waste acceptance questions, please contact US Ecology's Customer Service team at one of the locations below:

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| US Ecology Idaho | Grand View, Idaho | (800) 274-1516 |
| US Ecology Nevada | Beatty, Nevada | (800) 239-3943 |
| US Ecology Michigan | Detroit, Michigan | (800) 396-3265 |
| US Ecology Texas | Robstown, Texas | (800) 242-3209 |

The profile Form instructions are specific for US Ecology's TSDF facilities located in the United States. For waste acceptance at facilities outside the United States, please contact a customer service representative.

Section A- Customer Information:

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| 1 | Provide the generator's name |
| 2 | Provide the address where the waste is generated |
| 3 | Provide the mailing address. If the mailing address is the same you can leave Item A.3 blank. This address will be used for the return of manifests. |
| 4 – 7 | Provide a technical contact name and telephone number for technical inquiries regarding the information on the profile form(s) and resolution of off-spec (non-conforming waste) loads |
| 8 | Provide the generator status. Refer to 40 CFR § 261.5 and § 262.44 to determine EPA generator status. |
| 9 | Provide the Generator's EPA ID number |
| 10 | If the waste is state regulated (for example, Cal-Haz), provide the state EPA ID number. This may be blank for Generators operating in states that do not issue state specific ID numbers. Texas Class 1 industrial non-hazardous wastes must have both EPA and Texas State ID numbers. An EPA ID number is not required for Conditionally Exempt Small Quantity Generators (CESQG) or for non-RCRA and/or non-hazardous wastes. Please use "N/A" for EPA ID numbers for Non Regulated/Non RCRA material and "CESQG" for Conditionally Exempt Small Quantity Generators |
| 11 | Include the applicable Standard Industrial Classification (SIC) Code for the generator represented in Section A of the Profile Form. You may use National Industry Classification Code (NAICS) as an alternative. The generator facility may have multiple SIC/NAICS codes. Please include the Code associated with the generation of the waste being profiled. The following link provides the most current code list. http://www.osha.gov/pls/imis/sic_manual.html . |
| 12-14 | If the name of the company being billed and the billing address information is the same as the information provided in Questions A.1-4, please check the box indicating that the billing information is the same. Also, check the box indicating if a P.O. is required for payment. |
| 15 | Provide the name of the billing contact |
| 16 - 18 | Provide the phone number, fax and email of the billing contact |

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Section B- Shipping Description

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| 1-5 | Provide the Proper Shipping Name, hazard class, UN/NA #, Packaging Group and RQ that will appear on the manifest in accordance with DOT regulations. If the waste is not a hazardous material enter "non-DOT Regulated Waste Material" in response to B 1. If additional DOT descriptions apply include a supplement list. |
| 6 | Indicate the container type that material will be shipped to US Ecology. Select all that will apply. |
| 7 - 8 | Estimate the frequency for which the generator will ship the waste to the facility and an estimate of the volume or quantity of each shipment. |
| 9 | Indicate if waste is being imported into the USA. If yes, please complete the Import Supplement available through a customer service representative or at US Ecology's website. |

Section C- General Material & Regulatory Information:

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| 1 | Provide the common name for this waste (e.g. lead contaminated soil, bag house dust, etc.). |
| 2 | Describe the process that generated the waste, include additional sheets as necessary. Please provide as much information as possible to enable US Ecology to identify safety hazards and determine if this process is specifically "listed" under RCRA, or if the waste may contain characteristic wastes. Refer to 40 CFR §261- Identification and Listing of Hazardous Waste, and §262 for Standards Applicable to Generators of Hazardous Waste |
| 3 - 7 | Complete these questions related to the physical appearance and odor of the waste (e.g., soil with scrap metal) to enable US Ecology to perform a visual confirmation that the waste received matches the waste profile when the shipment arrives at the facility. Any material that does not reasonably match the physical description will be placed on hold and off-loading delayed while US Ecology contacts the broker/generator to resolve the discrepancy. |
| 8 | Enter the source of knowledge used to determine the material composition and waste characteristics provided on the profile form. Check all boxes that apply. Please attach the appropriate information, such as lab results and/or Material Safety Data Sheets (MSDS) that you relied on to support your responses. |
| 9 | For US Ecology Texas customers only indicate whether the waste is considered "Industrial" or Non-Industrial" as defined in the State of Texas Regulations (Title 30, Part 01, §335.1). If the waste is not being profiled for acceptance at the Texas facility, leave this section blank. |
| 10 | Is the waste restricted under the EPA Land Disposal Restrictions (LDR) at 40 CFR 268.7. If "yes", a LDR certification must be submitted with the profile package. A copy of the LDR certification page can be obtained from the US Ecology website or from a customer service representative. |
| 11 | <p>If yes to 10, indicate whether the waste is considered wastewater, non-wastewater or debris. Title 40 CFR §268.2(f) specifies a "wastewater" < 1% total organic carbon (TOC) and < 1% total suspended solids (TSS). Title 40 CFR §268.2(d) specifies "nonwastewater" as a waste that exceeds 1% TOC or TSS. Debris is defined in 40 CFR §268.2(g) and in general, must be solid with greater than 50% of the waste greater than 2.5 inches in size.</p> <p><i>For example, Large rocks, manufactured objects, or tree stumps are considered debris. Soil, sludges, smelter slag, lead acid batteries, cadmium batteries and intact containers are not debris.</i></p> |
| 12 | Indicate if alternative LDR treatment standards under 40 CFR §268.49 for soils can be used. The alternative treatment standards are only applicable to soil as defined in §268.2. Please give a US Ecology customer service representative a call if you have RCRA hazardous soils and have questions as to the advantage of using the alternative soils treatment standards. |

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| 13 | <p>If the waste is RCRA Hazardous, indicate if the waste originated from any of the industries listed. The waste may have originated at a facility other than the generators facility listed in response to Section A of the Waste Profile Form. If the answer is “Yes” please complete the Benzene Waste Operations Supplement Form available at US Ecology’s website or from a customer service representative.</p> |
| 14 | <p>Indicate whether the concentration of Volatile Organics (VO) in the waste is greater than or less than 500ppm. Please ensure that this determination is consistent with the maximum expected concentrations of specific VO compounds listed in Section D of the Waste Profile Form. The regulations allow a determination of VO Concentration of the waste by either direct measurement at the point of generation [§265.1084(a)(3)] or by process knowledge [§265.1084(a)(4)]. Supporting information may be requested by US Ecology if the determination of VO Concentration is inconsistent with the sum of analytes presented in Section D of the Waste Profile form.</p> <p><i>For example, If the response to Question 14 indicated a VO Concentration less than 500ppm, however the sum of the individual constituents presented in Section D of the Waste Profile form or supporting analytical indicate 300 ppm benzene and 350 ppm toluene, supporting information would be necessary to support the VO Concentration determination.</i></p> |
| 15 | <p>Indicate whether the waste has been treated after generation? This question is important for determining the applicable LDR treatment standards. For example, if a D002 only waste has been neutralized to remove the characteristic of corrosivity and TCLP for cadmium is >0.11 but less than 1.0 mg/L, the waste will be nonhazardous but still restricted and needs treatment for the UHC of cadmium.</p> |
| 16 | <p>Please indicate if CERCLA (Superfund) waste. If yes, special provisions apply and disposal taxes may be reduced.</p> |
| 17 | <p>Indicate if the waste is butadiene waste from ethylene manufacturing process unit regulated by 40 CFR 63 subpart XX (40 CFR 63.1083).</p> |
| 18 | <p>If the RCRA waste codes do not include any D0XX Codes and the answer to C.12 is “No”, then the answer to this question is “No”. For D0XX code waste or if the answer to C.12 is “Yes”, indicate whether the waste contains any Underlying Hazardous Constituents (UHCs) other than the chemical compound indicated by the D0XX waste code that is provided in response to Question C.21.</p> <p><i>For example a waste with a D018 waste code (toxicity characteristic for benzene) containing toluene at 11 mg/kg would have toluene listed as a UHC but not benzene as UHC, as benzene is the primary constituent covered by the D018.</i></p> |
| 19 | <p>Indicate if the waste is excluded from being considered a solid waste under 40 CFR §261.4(a), solid waste not considered a hazardous waste listed in §261.4(b), or a hazardous waste exempt from certain RCRA regulations under §261.4(c).</p> |
| 20 | <p>Enter applicable state codes. State waste codes are required when shipping to US Ecology’s Texas facility.</p> |
| 21 | <p>Enter all applicable RCRA waste codes. If more space is required attach a separate sheet to the profile approval form.</p> |
| 22-24 | <p>For form codes, source codes and management codes, see EPA’s Hazardous Waste Report Instructions and Forms at: http://www.epa.gov/epaoswer/hazwaste/data/br05/forms.htm. The list of codes is available on US Ecology’s website.</p> |

Section D- Material Composition (Physical/Chemical)

Describe the physical nature of the material **and** identify important chemical constituents. For example, if a waste is primarily soil and debris and is contaminated with gasoline, then describe the percentage and range of soil and debris and quantify the concentrations of gasoline compounds measured in the mixture.

The description should be as informative as possible, for example “brown, clay soil – 80%” and “debris such as PPE, rocks, wood, metal, and pipes – 20%.” The sum of the percentages must equal or exceed 100%.

Chemical concentrations must include appropriate units of measure and differentiate TCLP results from Total results. List the typical value or range of concentrations. For example: Benzene “typical value”- 50 mg/l Total and range 30-100. If additional space is needed, please attach a list. Please list all TRI reportable components.

Sections E- Does the waste exhibit or contain the following:

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| 1 | Indicate whether the waste has oxidizer qualities. The waste may behave like an oxidizer and not necessarily exhibit a characteristic of Ignitability (D001) or be considered an oxidizer by DOT. |
| 2 | Indicate whether the waste is explosive as defined in 40 CFR §261.23(a)(6),(7) or (8). Please assess whether a D003 RCRA waste codes should be included in response to C.21. |
| 3 | Does the waste contain organic peroxide? Please assess whether a D003 RCRA waste codes should be included in response to C.21. |
| 4 | Indicate whether the waste is shock sensitive? Generally, shock sensitive materials should have a D003 waste code in response to C.21. |
| 5 | Indicate whether the waste contains tires? |
| 6 | Indicate whether the waste is pyrophoric. If yes, please assess whether a D001 or D003 RCRA waste code should be included in response to C.21. |
| 7 | Indicate whether the waste a compressed gas according to §261.21(a)(3)(i). An ignitable compressed gas should include a D001 waste code. Generally cylinders containing compressed gasses are not acceptable at US Ecology facilities. However empty cylinders that no longer have an intact valve may be acceptable. Different states regulate “aerosol cans” differently. |
| 8 | Indicate whether the waste contains any halogenated organic compounds listed in Appendix III to §268. |
| 9 | Indicate whether the waste contains reactive sulfides and provide the estimated concentration. If yes, please assess whether a D003 RCRA waste code should be included in response to C.21 [refer to §261.23(a)(5)]. |
| 10 | Indicate whether the waste contains reactive cyanides and provide the estimated concentration. If the waste contains reactive cyanides that cause the material to be classified as waste code D003, then the amenable portion of the cyanides will need to be determined. Amenable cyanides are amenable to treatment by chlorination. Prior to land disposal, both the total and the amenable cyanides must meet the LDR treatment standards (i.e. 590 ppm and 30 ppm, respectively). |
| 11 | Indicate whether the waste reacts with air or water. If yes, please assess whether the waste should include a D003 waste code in response to C.21. |
| 12 | Indicate whether the waste is thermally unstable. Thermally unstable waste would be expected to undergo violent change if heated. |

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| 13 | Indicate whether the waste is TSCA regulated PCB waste. If “yes” then a control sheet will be required with each shipment to the facility. US Ecology will accept customer control sheets that contain the minimum required information. A copy of US Ecology’s PCB control sheet is available on the website or from a customer service representative. |
| 14 | Indicate whether the waste is medical waste or infectious waste. If yes, US Ecology customer service will follow-up to determine if the waste is acceptable under the facility’s site specific permit. |
| 15 | Indicate whether the waste is radioactive. If “yes” then a profile addendum for radioactive waste must be completed. The addendum is available on the website or from a customer service representative. |
| 16 | Indicate if there is any possibility of incidental liquids to be generated or to separate from the waste during transportation. This may include exposure to precipitation or liquid phase separation |
| 17 | Indicate “yes” if the waste is a solid and “no” if the waste would pass through a paint filter. |
| 18 | Provide the expected pH range of the waste and a typical pH that is expected. Alternatively, check the appropriate box indicating the pH range. If the waste is aqueous and the pH is ≤ 2 or ≥ 12.5 the waste should include a D002 waste code. |
| 19 | Indicate the expected flash point of the waste and check the box if the flash point is below 140°F (60°C) according to the methods specified in §261.21(a)(1). A liquid waste with a flash point below 140°F should have a D001 waste code. |

Section F- Certification:

Indicate whether the waste can be disposed by US Ecology without further treatment

- If E.17 is “Yes”, the waste is non-RCRA, and does not require treatment such as solidification mark the box “Yes”.
- If the answer to C.10 and E.17 are “Yes”, and the waste will meet LDR treatment standards when delivered to US Ecology, mark the box “Yes”.
- If the answer to C.10 is “Yes”, and the waste will require treatment to meet LDR treatment standards, mark the box “No”.

The generator’s certification authorizes US Ecology to correct inconsistencies in the information provided through oral or written authorization. This communication will be retained with the permanent record of the approval information. If substantial changes are necessary the generator may be required to complete and sign a new profile approval form.

Disclaimer

This information was prepared by US Ecology Corporation. It is not legal advice, and may not be current. USE is not a law firm, nor does it provide legal advice on specific State and Federal regulatory interpretations. Therefore, this information does not create, expressly or impliedly, an attorney-client relationship. This information is not a substitute for legal advice from an attorney licensed in the reader’s state or country. US Ecology is not responsible for actions taken or not taken as a result of this information, nor for any errors or omissions it may contain.

Hazardous waste regulations are lengthy and complex, and this guidance is not intended to define all hazardous waste generator and disposal scenarios. For further guidance, please use the following link to access the Code of Federal Regulations: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=%2Findex.tpl>