Waste/Material Profile Form Instructions

Introduction

This guidance document was prepared to assist customers in completing US Ecology's Waste/Material Profile Form (WMPF). The WMPF and its supplements provide the necessary information to safely and compliantly manage our customer's waste/material. Completing all documents thoroughly aids in expediting the approval process. A current copy of the WMPF is available on US Ecology's website (www.usecology.com).

For specific waste/material acceptance questions, please contact our customer service team at 800-592-5489.

Section A- Generator/Customer Information:

1	Provide the generator's name.
2	Provide the address where the waste/material is generated and generator site phone number. If generator is located outside of the United States the Waste Import Supplement must also be completed and submitted.
3	Provide the mailing address. If the mailing address is the same, you can leave item A3 blank. This address will be used for the return of manifests. If the name of the mailing address is different than the site address, please provide the name on the first address line.
4 – 5	Provide a technical contact name, telephone number and email address for technical inquiries regarding the information on the WMPF and resolution of off-spec (non-conforming waste/material) loads.
6	Provide the generator status. Refer to 40 CFR § 261.5 and § 262.44 to determine EPA generator status. If VSQG/CESQG, then the VSQG/CESQG Certification Supplement must be completed. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.
7	Provide the Generator's EPA ID number. An EPA ID number is not required for Very Small Quantity Generators (VSQG) or for non-RCRA and/or non-hazardous waste/material, however a value should be entered for this field. Please refer to the regulations specific to your generating state when completing this field. If the generating state does not have specific requirements, please use "N/A" for Non-Regulated/Non RCRA waste/material, "VSQG" for Very Small Quantity Generators and "CESQG" for Conditionally Exempt Small Quantity Generators. Include the applicable North American Industry Classification System (NAICS) code for the generator represented in section A of the WMPF. The generator facility may have multiple NAICS codes. Please include the code associated with the generation of the waste/material being profiled. The following link provides the most current code list: https://www.census.gov/eos/www/naics/index.html If the waste/material is generated in a state that requires an additional ID provide the state ID number (example Illinois, Texas). 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.
Sec. A Cont.	Check the box if a P.O. is required for payment and is available to include on the WMPF.
8-9	Provide the invoicing company details.
10	Provide the name of the billing contact.
11	Provide the phone number and email of the billing contact.

Section B- Waste/Material Stream:

1	Provide the common name for this waste/material (e.g. lead contaminated soil, baghouse dust, etc.).
2	Describe the process that generated the waste/material, including additional sheets if 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/material may contain characteristic hazards. For certain streams, such as IDW and remediation waste, a site history is required. Refer to 40 CFR §261- Identification and Listing of Hazardous Waste, and §262 for Standards Applicable to Generators of Hazardous Waste.
3	Use drop down menu to select appropriate source and form codes. The codes can also be found on the EPA's website. Source and Form codes are required for all waste/material regulated under RCRA.

Section C- Shipping/Packaging Information:

1-3	Indicate if the material is DOT regulated. If yes, select waste, as appropriate, and provide the Proper Shipping Name, additional description (if applicable per 40 CFR 172.203), RQ details (if applicable), UN/NA # (include both the two letter prefix and 4 digits), Packaging Group, ERG #, and Hazard Class.
4	Indicate if utilizing a DOT Special Permit on this waste/material and identify the required permit number. A copy of the special permit may be required with submission of WMPF.
5	Provide a 24 hour emergency phone number.
6	Indicate if waste/material is a DOT inhalation hazard per 40 CFR 172.313
7	Indicate the container type(s) used to ship material to US Ecology. Select all that will apply. Indicate the container size(s) that will be shipped. (e.g. 55 gallon drum, 275 gallon tote, Cubic Yard Bag/box, etc.)
8	Estimate the volume of waste and the frequency at which it will be shipped.

Section D – Physical Properties:

1	Describe the physical nature of the material. List the typical value and range of contents in this section. Include additional sheets as necessary. (Section E6 will be used to quantify the concentrations of different compounds measured in the mixture.) For example, if a waste/material is primarily soil and debris contaminated with gasoline, then describe the typical percentage and range separately for each the soil and the debris, then utilize E6 to quantify the gasoline concentration. • 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 typical percentages must equal 100%. Please provide dimensions and weight of any debris present in the waste/material.

Section D – Physical Properties (Continued):

2-5	Complete these questions related to the physical appearance and odor of the waste/material. This will enable US Ecology to perform a visual confirmation that the waste/material received matches the WMPF upon arrival at the facility.
6	Indicate "yes" if the waste/material is a solid and "no" if the waste/material would pass through a paint filter. Reference SW-846 Test Method 9095B for additional guidance on paint filter testing. Indicate if there is any possibility of incidental liquids to be generated from the waste/material during transport. This may include exposure to precipitation or liquid phase separation.
7	Check the appropriate box/boxes indicating the pH range. If multiple selections are needed, they must be adjacent to each other. If the waste/material is aqueous and the pH is ≤2 or ≥12.5 the profile should include a D002 RCRA waste code in E3. A pH range must be selected for all material. If the waste is solid, please estimate the pH if mixed 50:50 with water.
8	Indicate the expected flash point of the waste/material and check the appropriate box indicating the flash point range according to the methods specified in §261.21(a)(1). If multiple selections are needed, they must be adjacent to each other. A liquid waste/material with a flash point below 140°F should include a D001 RCRA waste code in E3. Indicate the expected BTU/lb. value and or if it is greater or less than 5,000 BTU
9	Indicate if there are any handling or treatment issues with the waste/material. If there are, please describe them here. For example: Was the waste/material rejected from an alternate facility and why was it rejected? Has the waste stream ever been the cause or suspected cause of a fire or other adverse reaction? Are there any special handling controls utilized by the generator to prevent adverse reactions or prevent fires?

Sections E – Characterization & Chemical Composition:

1	For US Ecology Texas customers only, indicate whether the waste/material is considered "Industrial" or "Non-Industrial" as defined in the State of Texas Regulations (Title 30, Part 01, §335.1). If the waste/material is not being profiled for acceptance at the Texas facility, check N/A. Add primary waste registered in STEERS if applicable Indicate whether the waste/material is a residual waste in the state of Pennsylvania. If yes, please include the state code(s) that apply.
2	Enter applicable state waste codes other than any TX or PA state codes already noted in question 1. For guidance on state specific codes, please contact your customer service specialist.
3	Enter all applicable RCRA waste codes. If None is selected for RCRA waste codes, please indicate if the waste/material is excluded from being considered a solid waste or hazardous waste under 40 CFR §261.4(a), §261.4(b), or §261.4(c). Include the RCRA regulation utilized for the exemption.
4	Indicate if Cyanide is used in the process. If a cyanide compound is utilized, Total and Amenable Cyanide analysis is required. Reference SW-846 Test Method 9012B for additional guidance on cyanide testing.
5	Enter the source of knowledge used to determine the composition and characteristics provided on the WMPF. Check all boxes that apply. Please attach the appropriate information, such as lab results and/or Safety Data Sheets (SDS/MSDS), that you relied on to support your responses.

Sections E – Characterization & Chemical Composition (Continued):

6	Use this section to identify important chemical constituents. From our earlier example (reference D1), if a waste/material is primarily soil and debris and is contaminated with gasoline, this section would be used to quantify the concentrations of gasoline compounds measured in the mixture. Chemical concentrations must include appropriate units of measure and differentiate TCLP results from Total results. List the typical value and range of concentrations. For example: Benzene "typical value"- 50 mg/l Total and range 30-100. If additional space is needed, attach a separate list. Please ensure all TRI reportable components are listed in this section with concentrations. Reference https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals for additional guidance on TRI chemicals. Identify if the chemical concentrations exceed UHC for D001-D043 and LDR for all applicable waste codes

Sections F – Additional Properties (If none apply, check "none")

1	Indicate whether the waste/material is explosive as defined in 40 CFR §261.23(a)(6),(7) or (8). If yes, please assess whether a D003 RCRA waste codes should be included in E3.
2	Indicate whether the waste/material contains reactive sulfides and provide the estimated concentration. If yes, please assess whether a D003 RCRA waste code should be included in E3 [refer to §261.23(a)(5)].
3	Indicate whether the waste/material is shock sensitive. Generally, shock sensitive materials should have a D003 RCRA waste code included in E3.
4	Indicate whether the waste/material contains reactive cyanides and provide the estimated concentration. If the waste/material contains reactive cyanides that cause the material to be classified as 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 (590 ppm and 30 ppm, respectively).
5	Indicate whether the waste/material is radioactive. If yes, then the Uniform Radioactive Waste Acceptance Supplement must be completed. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.
6	Indicate whether the waste/material is reactive and include why. If D003 is entered as a response to E3, then question F1-F4 or F6 will need to be marked yes. F6 is utilized when the material is D003 for a reason not listed earlier (e.g. water or air reactive)
7	Indicate whether the waste/material is medical, infectious or biohazardous. If yes, US Ecology customer service will follow-up to determine if the waste/material is acceptable under the requested facility's site specific permit.
8	Indicate whether the waste/material contains PCB. If yes, then the PCB Supplement must be completed. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.

Sections F – Additional Properties: (Continued)

9	Indicate whether the waste/material contains Dioxins or Furans. Generally, waste/material containing either Dioxins or Furans should have a listed F, K, P or U RCRA waste code included in E3.
10	Indicate whether the waste/material contains any metal fines. If yes, please assess whether a D003 RCRA waste code should be included in E3.
11	Indicate whether the waste/material is pyrophoric. If yes, please assess whether a D001 and/or D003 RCRA waste code should be included in E3.
12	Indicate if the waste/material needs to be temperature controlled for transportation.
13	Indicate whether the waste/material is thermally unstable. Thermally unstable waste/material would be expected to undergo a violent change if heated.
14	Indicate if the waste/material contains biodegradable sorbents. If yes, the waste/material may require treatment prior to landfill. If you are unsure if the sorbent is biodegradable, please check with your customer service specialist.
15	Indicate whether the waste/material is a compressed gas according to §261.21(a)(3)(i). An ignitable compressed gas should include a D001 RCRA waste code in E3. If yes, then the Compressed Gas Cylinder Supplement must be completed. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.
16	Indicate whether the waste/material is considered a Used Oil per 40 CFR Part 279. If yes, then the Used Oil Supplement must be completed. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.
17	Indicate whether the waste/material has oxidizer qualities. The waste/material may behave like an oxidizer and not necessarily exhibit a characteristic of Ignitability (D001) or be considered an oxidizer by DOT. Please ensure the oxidizer is listed in E6 with concentration values.
18	Indicate whether the waste/material contains tires. Tires must be quartered prior to acceptance.
19	Indicate if the waste/material contains organic peroxide. Please assess whether a D003 RCRA waste codes should be included in E3.
20	Indicate if the waste/material contains Beryllium. Beryllium is acceptable for treatment but requires additional review for health and safety concerns.
21	Indicate if the waste/material contains Asbestos. If yes, indicate if it is Friable or Non Friable. For shipment, Asbestos must be adequately wetted (without free liquids) and placed in a leak tight container or wrapping. Waste containers must comply with NESHAP Asbestos 40 CFR Part 61 Subpart M container standards – reference 40 CFR 61.145(c) and 40 CFR 61.150.
22	Indicate if the waste/material contains ammonia or ammonia compounds. These constituents and their concentrations should be noted in question E6.
23	Indicate if the waste/material is a Hazardous Secondary Material per 40 CFR Part 260.10. If yes, complete the second question.
24	Indicate if the waste/material contains pharmaceuticals that are subject to a prescription. If yes, then the Pharmaceutical Certification Supplement must be completed. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.

Section G – Regulatory Information:

1	Indicate whether the total concentration of Volatile Organic Compounds (VOCs) in the waste/material is greater than or less than 500 ppm. Please ensure that this determination is consistent with the maximum expected concentrations of specific VOCs listed in question E6 of the WMPF. The regulations allow a determination of VOC concentration of the waste/material 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 VOC concentration is inconsistent with the sum of analytes presented in E6 of the WMPF. For example: If the response to Question G1 indicated a VOC concentration less than 500ppm, however the sum of the individual constituents presented in question E6 of the WMPF or supporting analytical indicate 300 ppm benzene and 350 ppm toluene, supporting information would be necessary to support the VOC concentration determination.
2	Indicate whether the waste/material has been treated after generation. This question is important for determining the applicable LDR treatment standards. For example: If a D002 only waste/material 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/material will be non-hazardous but still land disposal restricted, requiring treatment for the UHC of cadmium.
3	Indicate the type of RCRA hazardous waste as a wastewater or non-wastewater. Indicate if the alternative soil or debris treatment standards apply or if it meets LDR treatment standards. Title 40 CFR §268.2(f) specifies a wastewater as a waste that contains < 1% total organic carbon (TOC) and < 1% total suspended solids (TSS). Title 40 CFR §268.2(d) specifies non-wastewater as a waste that exceeds 1% TOC or TSS. Title 40 CFR §268.49 specifies alternative treatment standards only applicable to soil as defined in §268.2. Please call a US Ecology customer service specialist if you have RCRA hazardous soils and have questions as to the advantage of using the alternative soil treatment standards. Title 40 CFR §268.2(g) defines debris. In general, the debris must be solid with more than 50% of the waste greater than 2.5 inches in size. For example: Large rocks, manufactured objects, or tree stumps are considered debris. Soil, sludge, smelter slag, lead acid batteries, cadmium batteries and intact containers are not debris.
4	Indicate any applicable LDR Treatment Subcategories per 40 CFR §268.40.
5	Indicate if the site or waste/material is subject to NESHAP/MACT Standards. If yes, indicate the applicable subpart. For a complete list of regulated categories with corresponding subpart, reference the EPA's website.

Section G – Regulatory Information (Continued):

6	If the waste/material is RCRA Hazardous containing Benzene, indicate if it originated from any of the industries listed. (The waste/material may have originated at a facility other than the generator's facility listed in Section A of the WMPF.) If the answer is "Yes" please complete the Benzene Waste Operations Supplement and, if applicable, the Thermal Supplement. Both supplements are available on the US Ecology website (www.usecology.com) or from a customer service specialist.

Section H – Generator Certification:

1	Indicate if you would like the waste/material approved into a specific facility or for a specific treatment technology.
2	List the requested technology for the waste/material. If requesting a specific technology, please ensure H1 is checked as Yes. (e.g. Microencapsulation, Recycling, etc.)
3	Indicate if thermal processing at USE Texas is requested. If the answer is "Yes" please complete the Thermal Supplement. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.
4	List any additional restrictions for the waste/material. (e.g. generator is outbound restricted, landfill free option, etc.)
5	Indicate the requested US Ecology disposal facility. If requesting a specific facility, please ensure H1 is marked Yes. If shipping into USE Chicago, please complete the Illinois Disposal Supplement. The supplement is available on the US Ecology website (www.usecology.com) or from a customer service specialist.

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 WMPF.

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://www.ecfr.gov/cgi-bin/ECFR?page=browse