



Waste Stream Determination and Documentation Guidance

Businesses, government agencies, institutions, and other concerns generate many types of waste and are required to determine if any of their waste is hazardous. Only household waste is exempt from this requirement. This technical guidance document explains the steps involved in making a waste determination and the associated documentation requirements. This guidance is not designed for every waste stream and should not be used without consulting the regulations and SFA's Environmental Health, Safety and Risk Management (EHSRM) offices.

Making Waste Determinations

Hazardous waste determinations can be complicated, and must be done for every waste stream generated at a facility. Generally, the only waste stream that is not required to have a documented waste determination is office trash. Breaking the waste determination into steps can make it easier to complete the process.

Step 1

Make a list of all waste streams being generated at the facility. List what process generates each waste stream, and document how many pounds of each waste stream are generated each month (don't average over months) on the form attached.

Step 2

Check to see if each waste meets the definition of "solid waste" as found in the Code of Federal Regulations, 40 CFR 261.2. Waste is considered solid waste if it:

- Is a solid or a liquid (or in some cases a gas) that is discarded, abandoned, recycled, or considered inherently waste-like; and
- Is not otherwise exempt from the definition of solid waste under 40 CFR 261.4(a).

One common way materials become exempt from the definition of solid waste is when they are discharged to a sewer or drain that is regulated under the Clean Water Act, for example an NPDES discharge point, a pre-treatment system, or a Publicly Owned Treatment Works (POTW).

Step 3

Record how the analysis of the waste was made. Record any methods used and attach any outside documentation for the analysis. Documentation may include: Safety data sheets, Process flow diagrams, analytical results from an EHSRM-certified laboratory and chemical reaction diagrams.

Step 4

Prepare a document stating whether or not the waste is hazardous. If it is hazardous, list the applicable waste codes (D001, F003, U183, etc.). This is the very important hazardous waste determination process.

Documenting Waste Determinations

Maintain documentation of Steps 1 through 4. This documentation must be kept for 3 years from the last date the waste was shipped.

Adequate documentation will include a statement about whether or not the waste is hazardous as well as copies of all documents used in Steps 1 through 3. Documentation is required for all wastes, both non-hazardous and hazardous. Some examples of documentation that may be included are:

- Safety Data Sheets (SDS);
- Process flow diagrams;
- Laboratory Analysis;
- and/or, Chemical reaction diagrams.

None of these documents is acceptable as an adequate waste determination by itself, as none of them will state conclusively whether or not the waste is hazardous or non-hazardous.

Another document that is inadequate by itself is a Waste Profile from a contractor. These forms are often filled out by hazardous waste transporters and contractors through interviews with generators and frequently are not supported by any real investigation into the process generating the waste. In addition, they may be supported using analytical tests done in laboratories that are not certified by EHSRM. Always ask the contractor to use a EHSRM-certified laboratory for all analytical testing to ensure that a repeat analysis is not required. Also, if a Waste Profile is used as part of the hazardous waste determination, all supporting documentation, including those documents previously listed, must be attached.

Adequately documenting waste determinations can be difficult. To assist with this process, EHSRM has created the attached example document that may be used. This specific form is not required and may be modified to meet the specific needs of individual facilities.

Summary

Conducting an adequate determination for each waste stream and properly documenting that determination will help facilities stay in compliance and avoid costly mistakes. Adequate determinations are the foundation of any good hazardous waste management program and will help reduce management and disposal costs.

For additional information regarding proper management of solid or hazardous waste at SFA or help completing the required documentation you may contact Greg Moore at (936)-468-6034 or gregory.moore@sfasu.edu .



Waste Stream Determination Form

Building Name and Room Number: _____

STEP 1: Waste Name: _____

Description of Process: _____

Amount of waste generated each month: _____

STEP 2: Does this waste meet the definition of a solid waste? YES NO

STEP 3: Was laboratory analysis used to make this determination? YES NO

If yes, record the name and method for the laboratory analysis: _____

If yes, **attach** a copy of the analytical results to this sheet.

Was knowledge of the process used to make this determination? YES NO

If yes, list the name and dates of each document (SDS, process flow diagram, etc.) reviewed and/or attach them to this sheet _____

STEP 4: Is this waste non-hazardous? YES NO

Is this waste a listed hazardous waste? YES NO

If yes, list hazardous waste characteristics: _____

Name and title of the person making the determination: _____

Contact Phone: _____ Email: _____

Date: _____