



**DIRECTIVE NUMBER:** 9472.03-83

**TITLE:** Waste Analysis Requirements at Off-Site Storage Facilities

**APPROVAL DATE:** 12/13/83

**EFFECTIVE DATE:** 12/13/83

**ORIGINATING OFFICE:**

☒ **FINAL**

☐ **DRAFT**

**STATUS:**

- |     |  |
|-----|--|
| [ ] | A- Pending OMB approval                          |
| [ ] | B- Pending AA-OSWER approval                     |
| [ ] | C- For review &/or comment                       |
| [ ] | D- In development or circulating<br>headquarters |

**REFERENCE (other documents):**

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**OSWER      OSWER      OSWER**  
**/E   DIRECTIVE   DIRECTIVE   DA**

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United States Environmental Protection Agency  
Washington, DC 20460

## OSWER Directive Initiation Request

OSWER Directive Number  
9472.03-83

### Originator Information

Name of Contact Person Skinner	Main Code - Branch OSW	Telephone Number
Lead Office <input type="checkbox"/> OERR <input type="checkbox"/> OSW <input type="checkbox"/> OUST <input type="checkbox"/> OWPE <input type="checkbox"/> AA-OSWER	Approved for Review Signature of Office Director Date	

### Title

Waste Analysis Requirements at Off-Site Storage Facilities

### Summary of Directive

Where drummed wastes are transferred for storage to temporary holding facilities for more than ten days before shipment to final disposal facilities, they are subject to the storage facility standards of part 264.

12/13/83

### Key Words:

Waste Analysis, Off-site facility

### Type of Directive (Manual, Policy Directive, Announcement, etc.)

Policy Directive

### Status

☐ Draft  
☒ Final  
☐ New  
☐ Revision

Does this Directive Supersede Previous Directives? ☐ Yes ☒ No Does it Supplement Previous Directives? ☐ Yes ☒ No  
If "Yes" to Either Question, What Directive (number, title)

### Review Plan

☐ AA-OSWER ☐ OUST ☐ OECM ☐ Other (Specify)  
☐ OERR ☐ OWPE ☐ OGC  
☐ OSW ☐ Regions ☐ OPPE

### This Request Meets OSWER Directives System Format

Signature of Lead Office Directives Officer	Date
Signature of OSWER Directives Officer	Date

DEC 13 1983

MEMORANDUM

SUBJECT: Waste Analysis Requirements at Off-Site  
Storage Facilities

FROM: John H. Skinner, Director  
Office of Solid Waste

TO: Hazardous Waste Management Division Directors  
Regions I-X

On November 4, I met with representatives of Ashland Oil Co. regarding waste analysis requirements at their off-site storage facilities. I would like to share the highlights of that discussion with you, since it raised some generally applicable issues and since Ashland facilities will be undergoing RCRA permit reviews in a number of Regions.

Ashland typically picks up drummed wastes generated by its customers and transfers the drums for storage at temporary Ashland-operated holding facilities before shipment to final disposal facilities operated by other companies. Ashland's storage facilities apparently hold these wastes for more than 10 days; therefore, these facilities are subject to the storage facility standards of Part 264.

The focus of our meeting was the waste analysis requirements of §264.13. Ashland's representatives briefly described their waste analysis procedures, including: initial submittal of samples and profile sheets by generators; review and approval of this information prior to initial acceptance of the waste streams; annual resampling of the generator's waste streams; use of manifest; and "fingerprint" analysis before acceptance of the wastes at the final disposal facilities.

The major question raised at the meeting was the requirement of §264.13(c) that waste analysis plans at off-site facilities "must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper". Ashland was concerned that some Regional and State

permit writers were interpreting this regulation to require sampling and analysis of the contents of all, or a large number, of drums received for temporary storage. They argued that this was unnecessary and unreasonable, given their existing waste analysis procedures, their intimate knowledge of the wastes generated by their customers, the short duration of storage, and their safety-oriented management practices (e.g., drums are not opened; drums which show evidence of stress are not accepted).

Some flexibility is allowed under §264.13(c), as to how many drums must be inspected, and, if necessary, analyzed within each movement. The basic purpose of the waste analysis plan is to ensure that the facility has "all the information which must be known to treat, store, or dispose of the waste in accordance with" the RCRA permit standards (§264.13(a)). Sampling and analysis of incoming shipments are required "if necessary". This depends on a series of site-specific judgments which the permit writer must make. In making these judgments, the permit writer should consider:

- the facility's agreements with the generators; the generators' procedures for labeling, handling and manifesting wastes; and the facility's control systems when waste is received.
- the potential problems which may be posed due to the type and characteristics of the waste in relation to the storage process and the other wastes handled.
- the variability in waste characteristics and the problems that may pose.
- for intermediate storage, the procedures for "fingerprint analyses" at the ultimate disposal site, given the short period of storage at the holding facility.
- the adequacy of visual inspections of labels on incoming drums to satisfy the requirement of §264.13(c).

Because these are site-specific judgments, I did not provide Ashland Oil an assessment of specific requirements at their facilities. I did indicate that there is flexibility inherent in the regulations but that permit writers must apply the regulations to individual sites based on these considerations. -3-

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cc: Regional Hazardous Waste Branch Chiefs  
Regional Permits Section Chiefs  
Jack Sweet, Ashland Oil  
Bill Hood, Ashland Oil  
Jack Lehman  
Bruce Weddle  
Eileen Claussen

WH-563:TGrogan:cma:rm.263:382-2224:11/9/83:Disk PBTGroganCMA 1  
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