



The National Park Service EnviroFact Sheet

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Managing Hazardous Waste: Hazardous Waste Identification (HW-2) DRAFT

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Identifying wastes

correctly is important for sound hazardous waste management. Hazardous waste is defined as a *solid waste* that is either specifically listed under 40 CFR 261 or has certain characteristics (i.e., ignitable, corrosive, toxic or reactive). A *solid waste* is any solid, liquid, or contained gaseous material that is discarded by being disposed of, burned, incinerated, or recycled..

Following is a listing of potentially hazardous wastes typically generated in parks. Information regarding each of these wastes is discussed in separate EnviroFact Sheets, including:

- Antifreeze/Coolant Waste,
- Asbestos Waste,
- Construction/ Demolition Waste,
- Lab Waste,
- Lead Paint Waste,
- Firing Range Waste,
- Paint and Solvent Waste,
- PCB Containing Waste,
- Sorbents and Wipes,
- Universal Wastes, and
- Used Oil

FOR MORE INFO...

EPA Hazardous Waste Identification page:
<http://www.epa.gov/epaoswer/hazwaste/id/id.htm>

RCRA Hotline Training Modules - Hazardous Waste Identification:
<http://www.epa.gov/epaoswer/hotline/modules.htm>

APPLICABLE REGULATIONS

The Resource Conservation and Recovery Act (RCRA) specifies management requirements for hazardous waste (40 CFR 261-272). RCRA regulations at 40 CFR 261 and 262.11 deal specifically with the identification of solid and hazardous waste.

Most states are authorized to implement their own RCRA regulations. Since state requirements may be more stringent, state hazardous waste regulations should be reviewed.



IDENTIFYING HAZARDOUS WASTE

The regulations at 40 CFR 262.11 require any person generating a waste to determine if it is a hazardous waste. To do so, RCRA requires waste generators to answer the following questions:

- **Is the waste a solid waste?** Before a waste can meet the definition of a hazardous waste, it must first meet the definition of "solid waste" (see definition at left).
- **Is the waste an "excluded" waste?** Only a small fraction of all wastes that meet the definition of a solid waste are considered "hazardous waste." Exclusions from the definition of solid waste are included in 40 CFR 261.4(a). If a material is listed under that Section of RCRA, it is not a solid waste and therefore cannot be a hazardous waste. The park should review the list to see if any of its waste streams fit these exclusions. A few examples include domestic sewage and mixtures of domestic sewage, arsenic-treated wood and household waste.
- **Is the waste a "listed" waste?** EPA has identified specific solid wastes as hazardous wastes in 40 CFR 261, Subpart D. For example, EPA lists certain spent solvents as hazardous waste. If any waste generated at the park is on this list, it must be managed as a hazardous waste.
- **Is the waste a "characteristic" waste?** If your waste does not appear on one of the hazardous waste lists, it still might be considered hazardous if it demonstrates one or more of the following characteristics:
 - **Ignitable**—can create fire under certain conditions (e.g., certain paints, degreasers and solvents);
 - **Corrosive**—acids capable of corroding metal (e.g., rust removers and battery acids);
 - **Reactive**—unstable or explosive under normal conditions, and may create fumes, gases, and vapors when mixed with water (e.g. cyanides or sulfide-bearing wastes); and/or
 - **Toxic**—harmful or fatal when ingested or absorbed, or it leaches toxic chemicals into the soil or ground water when disposed of on land (e.g., wastes with high concentrations of heavy metals).

RECORDKEEPING

To determine if a waste stream meets any of the characteristics listed above, the park must either:



- Test the waste in accordance with methods outlined in Subpart C of 40 CFR 261, **or**
- Apply personal knowledge of the generated waste stream (e.g., use information on a Material Safety Data Sheet).

Any documentation used to characterize a waste, such as laboratory tests or waste analyses, must be kept on file at the park for a minimum of three years (40 CFR 262.40).

UNKNOWN WASTES

A commonly encountered problem is "unknown" waste. The first step in characterizing such waste is to determine, if possible, the activity that generated it and any information on the characteristics of the raw materials used in the activity. If these steps do not result in a clear characterization of the waste, then analysis of the material should be performed.

HAZARDOUS WASTE IDENTIFICATION COMPLIANCE CHECKLIST

Checklist Item	Notes
1. Confirm that all waste streams at the park have been identified and documented.	
2. Confirm that state regulations applicable to the identification of solid and hazardous waste have been consulted.	
3. Confirm that evaluations have been made to determine if the park wastes meet the definition of a RCRA <i>solid waste</i> as defined by 40 CFR 261.2 (Note: certain materials are not solid waste when recycled).	
4. If a waste has been defined as solid waste, verify that evaluations have been made to determine whether the waste is exempt from RCRA hazardous waste regulation under 40 CFR 261.4.	
5. If a solid waste is not exempted, ensure that a determination has been made as to whether it is included on the List of Hazardous Waste under 40 CFR 261, Subpart D. Listed wastes can be from specific or non-specific sources. Mixtures of solid and hazardous waste are classified as hazardous waste.	
6. If a solid waste is not a listed hazardous waste, confirm that a determination has been made as to whether the waste is a characteristically hazardous waste under 40 CFR 262, Subpart C.	
7. Ensure that a waste analysis has been made for any unknown waste identified at the facility.	
8. Ensure that any documentation used to characterize a waste as hazardous or non-hazardous (evidence of generator knowledge, MSDSs or waste analyses) is maintained in facility hazardous waste management files.	