7.1.4 Toxicity Characteristics (TC)

The permit writer must evaluate whether TC wastes will be managed in the unit. However, caution is urged since some waste types might have multiple listings. OB/OD units may require TC permit conditions to address metals and explosives, and mechanical units may require TC permit conditions to address solvents and metals.

Permit conditions should include waste identification specific to the type of management and type of unit. The waste name, waste code number and the maximum volume per unit (capacity) should be included. Some permits present this data in a table format. Waste characterization may be based on testing or generator knowledge. If process knowledge is used for characterization, then the WAP (included as an attachment to the permit) must include the documented process knowledge which details the waste(s) properties and accurately characterizes all wastes that are stored and treated under the permit. Material Safety Data Sheets (MSDS), historical data and other types of published data must be presented in the permit application to support characterization of wastes through process knowledge. Detailed information on the wastes provided from existing published or documented waste analysis data or studies conducted on hazardous wastes generated by a process similar to that which generated the wastes may be included. Permit conditions which address the information and records that must be kept to document process knowledge should be specified.

For facilities that accept off-site generated wastes, the WAP must outline the procedures that will be performed to ensure that a detailed description of each generator's processes contributing wastes to the facility will be obtained, updated and kept in the files as part of the operating record. The permit

application should also have indicated how the process information provided by off-site generators would be verified. If periodic audits are conducted to verify generator information, then a permit condition should be included which specifies the audit documentation that needs to be maintained as part of the operating record.

An issue that arises with carbon and catalyst regenerations units is that spent refinery catalyst and chemically impregnated spent activated carbon containing organic sulfur may be capable of generating a sufficient amount of heat to cause a fire. Therefore, a permit condition may be written which requires that waste screening procedures include an exotherm potential test.

Permit conditions must also identify the unit specific management of the TC wastes and include operating conditions and closure plans.

Example TC permit conditions are presented in Attachment 7-3.