

4.2 Waste Analysis Plan

The Subpart X permit applicant must submit a waste analysis plan, as required by §270.14(b)(3), which includes analytical parameters and the rationale for the selection of such parameters, test methods, and methods and frequency of sampling. The waste analysis plan should address pretreatment wastes as well as post-treatment wastes. Waste analysis plans for facilities that receive wastes from off-site sources must include descriptions of procedures to be used to verify identity of each shipment received.

The waste analysis plan must comply with the requirements specified in 40 CFR §264.13(b). Those standards were designed to apply to the types of wastes that are present in conventional hazardous waste management units. Some of the standards therefore may not be applicable to the types of wastes treated in miscellaneous units. For example, as mentioned previously, certain wastes treated in OB/OD units may not be sampled and analyzed safely or easily. However, because the chemical compositions of many such wastes are well known and historical data are available, additional sampling and analysis of the wastes may not be required to demonstrate successful treatment of them. However, if there is no existing information regarding the chemical compositions of the wastes to be treated in the miscellaneous unit, detailed sampling and analysis of the wastes must be conducted to characterize the waste and to demonstrate that the wastes can be treated successfully in the miscellaneous unit. If the wastes cannot be sampled and analyzed safely and there are no historical data, the permit writer may wish to require the applicant to conduct a trial test to

demonstrate the effectiveness of the treatment process.

Sampling procedures for soil and groundwater may also be required if treatment takes place directly on the ground surface or if an environmental assessment indicates that there are risks from soil contamination. It is EPA's policy that precision and accuracy be assessed on all monitoring and measurement projects. This includes waste analysis plans.

Additional guidance on preparing waste analysis plans can be found in [Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes \(EPA/530-SW-84-012\)](#) dated April 24, 1994.