

analyses, or the result of treatment of similar wastes by similar treatment processes and under similar operating conditions. Permit writers may refer to [Appendix V of Part 264](#) for examples of potentially incompatible wastes.

4.3 Waste and Residual Characterization

A permit writer should require that a Subpart X permit applicant characterize the waste that is to be treated or disposed of (as generated wastes) and, if applicable, the residues of the treatment process. Post-treatment waste for OB/OD units may include ash/residues, scrap and unexploded ordnance (UXO). For thermal units, stack emissions as well as any waste residues from pollution control equipment need to be characterized. Post-treatment residues from mechanical units include scrap metal which may be coated with hazardous constituents and waste residues from pollution control devices. The WAP should also address the waste analysis approach for these post-treatment wastes. Again, generator knowledge may be an appropriate approach for the evaluation of the explosive reactivity of OB/OD generated scrap and UXO (i.e., considering the dangers of reactivity tests). The concentration of energetics for a residue sample (e.g., burn pan ash) can be used to define an explosive reactivity criterion. Soils contaminated energetics have not been found to be reactive. However, OB/OD post-treatment wastes may have other hazardous waste constituents or characteristics of concern that should be addressed by the WAP (e.g., metals). Post-treatment waste analyses should be conducted at a minimum annually if the waste energetics treated are consistent in composition. Otherwise, the analysis should be done for each individual waste stream annually or each ash/residue accumulative container subject to disposal.

4.3.1 Munitions, Explosives, and Other As-Generated Wastes

There are two major issues of special interest to permit writers with regard to the analysis of wastes to be treated or disposed of in Subpart X units. First, many of the wastes that will be treated in