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Waste Analysis Plan Guidance April 2015 (EPA 530-R-12-001) Summary

Prepared by the
Compliance Monitoring and Enforcement Task Force
ASTSWMO Hazardous Waste Subcommittee
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In April 2015, EPA issued a final Waste Analysis Plan (WAP) guidance manual. This guidance manual can assist State regulators in evaluating WAPs and determining whether or not a facility is in compliance with the regulatory requirements. The federal hazardous waste regulations are codified at 40 CFR Parts 260 through 279. This manual can also provide guidance in the development of used oil processor or re-refiner analysis plans in 40 CFR Parts 279.

Note: States are encouraged to contact appropriate State regulatory personnel to determine State specific regulations that may be more stringent than those codified in 40 CFR.

The WAP guidance manual contains four parts:

- General requirements in the federal regulations for developing a WAP and conducting waste analysis.
- General and facility-specific instructions on procedures for developing a useful WAP.
- Checklist to assist industry when conducting waste analysis and preparing a WAP.
- Facility-specific WAP examples.

This April 2015 guidance manual supersedes the 1994 edition. The new updates include:

- Integration of Data Quality Objectives in sampling and analysis
- Incorporation of Definition of Solid Waste final rule requirements
- Alternative requirements for laboratories owned by academia
- Conditional exemptions for military munitions
- Conditional exemptions for low-level mixed waste
- Organic air emission standards for tanks, containers, and surface impoundments
- Amendments to Land Disposal Restrictions (Phase II-IV rules)
- Revisions and updates to SW-846 methods

The link to the April 2015 WAP guidance manual is:

<https://www.epa.gov/sites/production/files/2015-04/documents/tsdf-wap-guide-final.pdf>

EPA is developing a web-based WAP Guidance training that consists of 5 modules, plus 10 exam questions. EPA has outlined these modules as follows:

- *Module 1: Introduction and Overview*
 - Discusses issues and recommendations for permit writers to improve RCRA waste analysis plans (WAPs) based on EPA WAP Guidance and EPA and State workgroup experience.
 - Training is not intended to be comprehensive of all aspects of WAP development and review, or a substitute for reading the WAP guidance.
 - Although intended primarily for experienced permit writers, this training may be helpful to others.
 - This training is based on the Federal RCRA program and assumes a basic knowledge of RCRA regulations, the permitting process and WAPs.
 - State personnel should consult their State regulations for requirements that are more stringent and/or broader in scope.

- *Module 2: Key WAP Concepts*
 - Discusses the following key concepts:
 - The WAP Guidance gives recommendations for WAP content and organization.
 - A WAP must be written to be effective and enforceable.
 - The WAP Guidance places emphasis on sampling and analysis.
 - A WAP must ensure appropriate waste analysis quality by evaluating waste variability and permit limit precision (conceptual model).
 - A WAP must address considerations and concerns with using generator or process knowledge.
 - WAPs must require TSDFs to corroborate knowledge-based information supplied by the generator.

- *Module 3: Key WAP Procedures*
 - Discusses waste sampling and analysis issues for pre-acceptance procedures to ensure wastes meet facility acceptance criteria.
 - Highlights recommendations for acceptance procedures, such as ensuring incoming waste shipments match the waste expected.

- *Module 4: Key WAP Subjects*
 - Describes representative and authoritative sampling and their key differences.
 - Describes grab versus composite sampling.
 - Discusses issues related to test methods and SOPs and highlights their importance for WAP compliance.
 - Discusses issues related to precision and bias.

- *Module 5: Special Circumstances*
 - Describes similar and overlapping requirements for waste sampling and analysis at hazardous waste combustion units subject to both RCRA and the Clean Air Act MACT rules.
 - Highlights sampling and analysis issues for meeting LDR requirements.

The web-based WAP Guidance training is set to officially launch February 2017.