

Standards (40 CFR 268.48 Table UTS) for RCRA Metals (D004-D008, D010-D011) only. Wastes that are involved in treatment operations will undergo two sets of analysis:

Initial Analysis of Untreated Waste:

Initial testing of Underlying Hazardous Constituents (UHCs) will be performed by collecting a 5-point composite sample. This sample will be taken before treatment at the client site or at the Triumvirate Environmental (Florida), Inc. facility. The composite sample will be analyzed for TCLP metals, and other suspected UHCs, in order to determine the initial metals' concentrations prior to treatment. Wastes that fail to meet UTS for constituents other than the RCRA metals (D004-D008, D010-D011) and mercury will not be eligible for treatment. Soils may be initially tested to determine UHCs and contaminant levels.

Post-Analysis of Treated Waste:

After treatment, all batches will undergo TCLP analysis to verify that the concentrations of RCRA metals are below the Universal Treatment Standards for metals (D004-D008, D010-D011) and no longer exhibit hazardous waste characteristics. A grab sample will be collected for the TCLP analysis.

For soils, the alternative treatment standard may be applied according to 40 CFR 268.49. Post analysis will be conducted to confirm compliance with the 90% reduction (capped by 10X UTS) option, or 10X UTS option. If after the 90% reduction, or the 10X UTS option, the results in a concentration indicate that the waste is still characteristically hazardous for toxicity, the waste will be sent to a Subtitle C landfill for disposal. See Table II.A.5/6-4 for treatment levels.

All treated waste that are de-characterized and meet the appropriate treatment standards will be sent to a permitted Subtitle D landfill. Any waste that fails to meet applicable treatment standards or exhibits hazardous waste characteristics will be shipped to a permitted TSDF for disposal.

7.0 Management of Non-Conforming Wastes

When inbound waste streams are tested and inspected in accordance with the procedures described in the preceding paragraphs and are found not to conform to information provided in the waste profile evaluation documents, these waste streams are subject to the procedures explained below. Regulations in 40 CFR 264.72(c) indicate the facility may resolve discrepancies in waste types within 15 days from the date the waste in question was received and if not resolved the FDEP must be notified. The first step to resolve a discrepancy created by a non-conforming waste is to obtain instructions from the generator indicating whether the waste should be returned to the generator or an amendment to the waste evaluation documents to correct the deficiencies discovered by the verification process is possible. If the generator chooses to amend the evaluation documents, the waste profile must be modified by the generator and, depending on the nature of the discrepancy,