

How Can I Determine if I Have Hazardous Waste?

All generators of waste materials are required by law to identify and evaluate their waste. Some wastes are specifically listed in "Identification and Listing of Hazardous Wastes," 40 CFR Part 261. Other wastes may be regulated because they exhibit certain characteristics (ignitability, corrosivity, reactivity, toxicity).

Are my wastes specifically listed as hazardous waste?

The EPA lists hazardous wastes beginning in 40 CFR 261.30. These wastes come from non-specific or specific sources or are discarded or off-spec commercial chemical products and residues. Some listed wastes are so dangerous that they are very toxic, even in small amounts. These are called acute hazardous wastes.

Does my waste possess a hazardous characteristic?

Your waste may not be a listed hazardous waste but may be identified as a characteristic hazardous waste if it exhibits any of the following characteristics:



1. Ignitability: The waste material (solid, gas, or liquid) must have a flashpoint of less than 140°F and/or be an aqueous solution with an alcohol content of greater than or equal to 24 percent. Examples are solvents, paint thinners and oxidizers. The hazardous waste number is D001.



2. Corrosivity: The waste material must be a liquid and have a pH of less than or equal to 2.0, or greater than or equal to 12.5. Examples are acids and caustics. The hazardous waste number is D002.



3. Reactivity: The waste material is reactive to water, shock, heat, and pressure, and undergoes a rapid or violent chemical reaction. Examples are perchlorates, peroxides, and cyanides. The hazardous waste number is D003.



4. Toxicity Characteristic (TC): This category includes eight heavy metals and thirty-two organic chemicals, including ten pesticides. Waste in this category need only contain very small amounts of arsenic, lead, mercury or one of the other heavy metals; organics such as benzene, trichloroethylene, perchloroethylene, vinyl chloride, or methyl ethyl ketone; or one of the ten pesticides. These have hazardous waste numbers D004 - D043.

Still confused on identifying your wastes?

You may have accumulated waste that you suspect to be hazardous, but for some reason the product information is not available. Your only alternative is to have a commercial testing laboratory sample and test your waste.

You should ask the lab to perform only those tests needed to determine the waste type and the hazardous characteristics. The cost of analysis will depend upon the complexity of the tests needed to determine whether or not the waste is hazardous. Reduce your analytical costs by providing the laboratory with as much information as possible on the constituents of the waste.

Steps for waste identification:

- Check the MSDS (Material Safety Data Sheet) for product information.
- Check with your supplier/manufacturer.
- Read the product label.
- Compare product information with the listed wastes and hazardous waste characteristics in 40 CFR part 261.

Should I notify DEP of my hazardous waste?

Small Quantity Generators of hazardous waste are subject to regulation and must notify the Florida Department of Environmental Protection (DEP) of their activities. This is done by submitting EPA Form 8700-12FL, Notification of Regulated Waste Activity. Forms and instructions can be obtained by writing to DEP or from the web:

Hazardous Waste Notification Coordinator
Hazardous Waste Regulation Section
Department of Environmental Protection
2600 Blirstone Rd MS 4560
Tallahassee, Florida 32399-2400
http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-730.htm

