WASTE STREAM PROFILING INSTRUCTIONS

TRADEBE

Section A- Generator & Customer Information:

- Complete the required address information involved with this waste
- If the location the waste will be picked-up is different from the generator's physical address, please fill out mailing address section below
- Generator's 12 digit alpha numeric EPA identification number. If generator does not have an EPA ID number, indicate if they are a Conditionally Exempt Small Quantity Generator / Very Small Quantity Generator
- North American Industrial Classification System (NAICS) is a federal classification that assigns a code based on the type of business. Some of these codes require special handling and reporting. For further information and a list of these codes, please reference: https://www.naics.com/search/
- "No Canada" or "No Landfill" policy. Indicate if the generator has any restrictions on the waste stream going to a landfill or to Canada for disposal

Section B- Waste Stream Information:

- Generator's Waste Name - This is name the generator uses to identify their waste (e.g. paint clean up, cured resin, landfill leachate). There are no requirements for the waste name; however, if it is an unused/expired product Tradebe recommends using the product name in this section
- Process generating waste – Detailed description of how the waste was created
- Is this waste exempt from RCRA regulations? – Some wastes, although they fit the description of hazardous waste, are exempt/excluded from RCRA regulation. If your waste is exempt mark it here and cite the exemption. Use continuation page if necessary. Note that having no RCRA codes is not an exemption; it's just not waste
- Is this waste from a CERCLA cleanup site? – Indicate if waste is from a Superfund or other government ordered cleanup
- Waste determination was made by – Indicate what information was used to characterize the material in question. Common methods of determination include testing, generator knowledge, SDS, and/or a sample
- Does the waste have any of the following characteristics? – Identify high-hazardous characteristics. Waste streams with these characteristics may pose an additional safety concerns and require special handling and packaging

Section C- General Characteristics:

- Color - Color of the waste
- Odor – Odor of waste. Odorous waste streams may require special handling. Examples include thiols, butyric acid, amines, mercaptan, and sulfides
- Physical State – Indicate physical state include each of the waste's phases (e.g. 90% liquid with 10% sludge)
- Phases – Indicate how many phases or layers this waste may have (e.g. non-soluble oil and water form two phases)
- BTU – btu (british thermal unit) is the heat energy contained in a waste. Substances like oil and flammable liquids tend to have high BTU values, while waste with high water generally has low BTU value. BTU can be an indicator of organic content or a material's suitability for fuel blending
- pH – pH is an indication of a material's corrosivity. The pH scale goes from 0 (very acidic) to 14 (very basic) with pH 7 being neutral (i.e. non-corrosive material)
- Flashpoint – the flash point is the lowest temperature at which a volatile liquid will emit enough vapors to form an ignitable mixture with air. Flash points < 140 F are DOT and RCRA flammable liquids
- Viscosity – a measure of resistance to flow (i.e. how well the material pours). Measured in centipoise (cP)
- Boiling Point – the temperature at which the waste will boil
- Specific Gravity – SG is the weight of a material relative to that same volume of water. Example: 1 gallon of water weighs 8.3 lb; if a substance has an SG of 1.5 that means 1 gallon would weigh 12.45 lb (8.3 x 1.5)
- Total Halogens – Indicate the % of chlorine, fluorine, bromine, and iodine in the waste
- Total Organic Carbon – This is the total amount of carbon in the waste derived from organic sources

- Volatile Organic Compounds – compounds with a low temperature of vaporization or sublimation

Section D- Chemical Composition:

- Constituents – list all chemicals in the waste stream and their ranges (including units)
  PLEASE NOTE: Composition on the profile must add up to 100% for Tradebe to remain in compliance. Inert ingredients, non-hazardous materials, and trade secret ingredients must be identified. Use Safety Data Sheets (SDS) and/or a call to the manufacturer are good ways to find missing information
- Does the waste contain any of the following? – Indicate if the waste stream contains any of the constituents listed, these constituents may require special waste packaging and /or handling
- Does this Waste contain Benzene subject to Subpart FF Regulations? – If there is benzene in the waste, then the NAICS code should be checked for NESHAP regulation. A list of these codes is included in the "NAICS" tab; these industries are subject to additional reporting requirements under the Clean Air Act 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations
  NOTE: If the waste stream contains benzene and is generated from a facility operating under one of the listed NAICS codes, Tradebe MUST take extra steps in receiving, handling, processing and reporting the waste. During the review process of the waste stream profile, a supplemental benzene NESHAP form will be required. In addition, the waste stream and will be required with each shipment thereafter
- Waste Water Analysis - Complete this portion of section D only if this waste stream is destined for treatment at a TTR NE wastewater treatment facility

Section E- Other Waste Stream Information:

- Is this waste a USED OIL per 40 CFR Part 279? – Indicate if this is a used oil. If not, skip the next 3 questions
  - If YES, do the total halogens exceed 1,000 ppm? – Indicate if the used oil contains total halogens exceeding 1,000 ppm. If not, skip the next 2 questions
  - If YES, can you identify the chlorinated constituent(s) - Check YES if you know how the waste became contaminated with chlorine
  - If YES, can you rebut the presumption the material is a hazardous waste? – Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of part 261. Generators may rebut this presumption by demonstrating that the used oil does not contain hazardous waste. If this is the case a supplemental rebuttable presumption addendum form will be requested for completion prior to approval of the waste stream
- Does this waste contain any Class I or Class II ozone-depleting substances? - includes CFCs and highly halogenated organics. See also: EPA ozone depleting list
- Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65? The Emergency Planning and Community Right-to-Know Act requires business to report any chemicals on their site that are found in the EPCRA regulations: EPCRA 313 info
- Does this waste contain any 'Chemicals of Interest' listed in 6 CFR Part 27 Appendix A? If you are viewing this with MS Excel there is an additional sheet (or tab) that contains the DHS Chemicals of Interest. Otherwise, please reference the DHS Chemical of Interest list here: DHS CoI

Section F- RCRA Characterization:

- Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? – Wastes carrying RCRA codes are considered USEPA hazardous waste
- Is this a Universal Waste per 40 CFR Part 273? – Universal Waste varies by state, but the most common are batteries, some pesticides, mercury containing equipment, and fluorescent lamps/bulbs
- Does treatment of this waste generate an F006 or F019 sludge? – Wastes originating from several plating processes may not themselves be a waste, but their treatment requires an F-code to be added during the treatment of the material. Further information can be found in 40 CFR 261.31
- List characteristic codes (D001–D043) – List all D-Codes required by 40 CFR 261.21, 261.22, 261.23, and 261.24
- Underlying Hazardous Constituents - For the Land Disposal Restriction Notification the EPA requires all waste carrying D-codes to also list the UHCs present in the waste. Review the list of UHC on Appendix I and check all that are present in the composition
- List any applicable “F” or “K” codes – Is it a hazardous waste listed under 40 CFR 261.31

- List any applicable “U” or “P” codes – Is it hazardous waste listed under discarded commercial chemical products, off-specification material, container residues, or spill residues per 40 CFR 261.33
- List any state regulated codes – Some states require codes assigned by the state’s waste management regulations. Include any such codes here.

Section G- Shipping Information:

- Indicate the shipping container, type, size, quantity and shipping frequency
- Is waste a combination package? – indicate if this is a loose-pack, commodity pack, or something of that nature

Section H- DOT Shipping Information:

- Is this a USDOT Hazardous Material? – Answer yes if your waste requires a proper shipping name, hazard class, and UN/NA number
- Shipping Name per 49 CFR 172.101 Hazardous Materials Table: Hazard Class, UN/NA identification number, packaging group – Review 49 CFR 172.101 and determine hazardous materials shipping description
- Technical descriptors if required, RQ if required – Review 49 CFR 172.203(k) for explanation of when technical descriptors are required and indicate one or two descriptors as applicable. Review Table 1 to Appendix A in 172.101, Hazardous Substances Other Than Radionuclides, and indicate the RQ value if applicable
- DOT Special Permit – Indicate DOT-SP required for transporter and include a copy of the special permit

Section I- Generator Certification:

- The generator must print their name, title, sign and date, verifying that the completed profile is accurate and that no omissions or characteristics, composition or properties exist and that all known or suspected hazards have been disclosed. If a broker or agent is signing on behalf of the generator, we need an authorization form on file

If you have additional questions on completing the profile or LDR, please contact your customer service representative