

# WASTE CHARACTERIZATION RECORD

## EXAMPLE AND GUIDANCE

To meet the waste characterization and recordkeeping requirements of the waste regulations,<sup>1</sup> consider creating a record that details your answers to the waste characterization questions provided in the form below. This detail will help ensure thorough documentation of your determination and provide a comprehensive resource for your site's management team. Answers to the questions provided on the form would supplement the following records that are specifically required under the rules and required to be available at the site of generation for each waste stream requiring review:

- Waste type.<sup>2</sup>
- Narrative description of the waste.<sup>2</sup>
- Source of waste.
- Chemical composition and properties of the waste and anticipated fluctuations in its chemical composition and properties.
- Test results obtained from sampling and analyzing the waste.
- Records documenting the validity and relevance of the tests, sampling, analytical or other methods used, including all of the following information:
  - a. The sampling procedure used and the reasons for determining that the sample is representative of the waste.
  - b. The accuracy and precision of any tests conducted.
  - c. The knowledge basis for the generator's determination if testing, sampling, and waste analyses were not conducted.
- Safety Data Sheets (SDS) or other reference materials relied upon for making the waste determination.
- Any calculations used to evaluate subpart BB and CC applicability (to determine the parts per million volume {ppmv} volatile organic compound content of the waste).

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<sup>1</sup> Part 111, Rules 302 and 311; Part 121, Section 12103(1)(a) and 12103(3); and Part 115 section 11504(2) and 11518(4).

<sup>2</sup> Use the same waste type, waste description, and any other unique waste identifier on this form as you use on the land disposal restriction notification and uniform hazardous waste manifests created for this waste stream.

When completing the record, make sure to:

- ✓ Assign every hazardous waste number that is applicable for the waste stream.
- ✓ Describe the waste type using the name of the chemical(s), such as “acetone” or “methylene dichloride,” or the type or class of chemical, such as “organic solvents” or “halogenated organic solvents” or, as applicable, the proper shipping name and technical name markings used to comply with DOT requirements at 49 CFR part 172 subpart D.

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has developed this example to use for recordkeeping purposes. The questions in this example do not address radioactive waste, infectious or pathogenic medical waste, or Toxic Substance Control Act applicability. Consult with a specialist on these topics if you have a waste that may be subject to these regulations.

For questions on waste characterization and required records related to Michigan’s hazardous waste, liquid industrial by-products, and solid waste regulations, contact your local [District Office](#) hazardous waste inspector.

To find a hazardous waste disposal vendors, see the [list of vendors](#) that assist with the collection of household hazardous waste in Michigan or search the [Waste Data System](#).

To learn more about waste characterization and Michigan’s waste regulations, see:

- [Waste Characterization Guidance](#)
- [Chapter 2](#) of the [Michigan Guide to Environmental Health and Safety Regulations](#) and
- Recorded [Waste Characterization Webinar](#) and [Webinar Notes](#)

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Completed By:  
Completion Date:

## WASTE CHARACTERIZATION RECORD

### Waste Details

### Sample Details

Waste type:

Date sampled:

Location(s) sampled:

Waste description:

Sample procedure:

Waste source:

Analysis method:

Waste codes:

Basis for concluding the sample is representative of the waste and analysis method is valid:

Other:

Accuracy and precision of the test:

Other:

Product name(s) for safety data sheets (SDS) considered:

Subpart BB or CC applicability:

Land disposal restrictions underlying hazardous constituents:

**Listed Review**

1. Is this an unused raw material that is a commercial chemical product listed in Part 111 Table 205a, 205b, or 205c (P or U listed)?  Yes  No
2. Does the process generating the waste make the waste a hazardous waste by definition because the process waste is listed in Part 111 Table 204a (K listed)?  Yes  No
3. Does the waste contain spent solvents that meet the listing in Table 203a or is the waste a wastewater treatment sludge that meets the listing in Table 203a (F listed)?  Yes  No

**Listed Waste Exclusion Review** - List any exclusion relied upon to exclude waste from hazardous waste regulation (e.g., continued use, hazardous secondary material).

**Characteristic Review**

4. Does the waste exhibit a characteristic that makes it a characteristic hazardous waste?  
 Ignitable       Corrosive       Reactive       Toxic or Acutely/Severely Toxic

**Characteristic Waste Exclusion Review** - List any exclusion relied upon to exclude waste from full hazardous waste regulation (e.g., very small quantity generator, universal waste, scrap metal, solvent wipes, etc.).

**Liquid Industrial By-product Review**

5. Does the waste pass through the paint filter (liquids break through the filter) using Test Method 9095 under SW-846 (e.g., the waste “fails” the paint filter test and liquids break through the filter)?  Yes  No

**Liquid Industrial By-product Exclusion Review** - List any exclusion relied upon to exclude waste from liquid industrial by-product regulation (e.g., off-specification fuel direct shipped for refining, vegetable/animal oil managed under Act 239 of 1982, etc.).

**Solid Waste Review**

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|---|-----|----|
| 6. Is the material excluded from the definition of solid waste?   | Yes | No |
| 7. Is the material an inert material?                             | Yes | No |
| 8. Is the material a recyclable material?                         | Yes | No |
| 9. Has the material been granted an exclusion from Part 115?      | Yes | No |
| 10. Is the material a beneficial use byproduct?                   | Yes | No |
| 11. Is the material a source separated diverted waste?            | Yes | No |
| 12. Is the material a low-hazard industrial waste under Part 115? | Yes | No |

Attach all supporting documents (lab results, SDS's, calculations, etc.).