

ATTACHMENT 1
WASTE ANALYSIS PLAN

**FORM EQP 5111 ATTACHMENT MODULE A3
WASTE ANALYSIS PLAN (WAP)**

This document is an attachment to the Department of Natural Resources and Environment's *Instructions for Completing Form EQP 5111, Hazardous Waste Treatment, Storage, and Disposal Facilities Construction Permit and Operating License Application Form*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, and R 299.9605, and Title 40 of the Code of Federal Regulations (CFR) §§270.14(b)(3) and 264.13(b) and (c), establish requirements for WAPs for hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application module addresses requirements for a WAP for the hazardous waste management units and the hazardous waste management facility for the Dow Corning Corporation facility. All activities associated with the WAP will be conducted at the Dow Corning Corporation facility located at 3901 S Saginaw, Midland, MI.

This module is organized as follows:

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A3.A COMMERCIAL FACILITY

Dow Corning Corporation (Dow Corning) is a commercial facility that receives wastes generated off site. Dow Corning has developed a Waste Analysis Plan (WAP) to ensure that its facility at 3901 South Saginaw, Midland, Michigan will accept only wastes that it is authorized to accept. The hazardous wastes stored at Dow Corning will be properly characterized prior to waste acceptance.

All analysis performed pursuant to this application will be consistent with the Quality Assurance/quality Control (QA/QC) Plan included in this Module Section 3.A(2)(d). All samples for the purpose of waste characterization will be collected, transported, stored, and disposed by trained and qualified individuals in accordance with the QA/QC Plan.

In accordance with R 299.9609 and 40 CFR §264.73 and Part 264, Appendix I, Dow Corning will retain all records and results of waste determinations performed as specified in 40 CFR §§264.13, 264.17, 264.314, 264.1034, 24.1063, 264.1083, 268.4(a), and 268.7 in the facility operating record until closure of the facility.

A3.A.1 Initial Waste Characterization Requirements for Generators [R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(b)(5)]

Dow Corning receives hazardous waste from off-site U.S. operations that are majority owned by Dow Corning.

Wastes generated by Dow Corning's U.S. operations are characterized in accordance with the requirements of R 299.9605 and 40 CFR 264.13 by the information contained in the Product Data Management (PDM) system and in the Material Safety Data Sheets (MSDS) maintained by the company and available on the company's systems network. See Appendix A3-1 for an overview of the PDM system. This information is updated anytime the composition or generating process of a material is changed. The updates are carried out as part of a formal review process initiated during the planning stages for the creation or modification of any process or product. As part of this formal process, the composition, physical and chemical characteristics, and regulatory status, including Resource Conservation and Recovery Act (RCRA) characterization, are reviewed by qualified personnel. This review process applies to all hazardous wastes generated by all Dow Corning U.S. operations and therefore to all hazardous wastes received at this facility, whether from the Midland location or from other, off-site Dow Corning locations. The wastes shipped by other U.S. locations are characterized in the corporate PDM system in the same manner as wastes generated by operations at the Midland site. Off-site Dow Corning operations notify this facility of the identity of the wastes they wish to ship by using material identifiers by which the information in the PDM system may be accessed. Approval from this facility is required prior to shipment.

All Dow Corning U.S. operations are required by corporate policy to adhere to the product and process review procedure whenever there are any significant changes to product composition or process parameters. This ensures that this facility always has accurate information concerning the wastes it receives from other Dow Corning locations.

In addition to the waste profile information submitted by the generator, Dow Corning will:

Require submittal of a representative waste sample

- Conduct an audit of the generator facility
- Review industry literature to identify typical waste streams
- Other:

Upon receipt of waste shipped from another Dow Corning location, or returned virgin products from its customers; a minimum of 10% of the containers received of each waste stream, but not less than one container of each waste stream, is opened and visually inspected for color and physical state. This inspection is performed in the receiving area in the northeast extension of 809 Building. If these are consistent with the expected parameters for that waste stream, and if the labels and packaging are consistent with those expected for that waste stream under Dow Corning corporate guidelines for packaging and labeling as well as U.S. EPA and U. S. Department of Transportation (U.S. DOT) requirements, then the waste is accepted.

A3.A.1(a) Generator Waste Characterization Discrepancies
[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §§264.13(a)(3) and (4),
264.13(b)(c), and 264.72]

Dow Corning receives hazardous waste from only off-site U.S. operations that are majority owned by Dow Corning or returned virgin products from its customers. All Dow Corning U.S. operations are required by corporate policy to adhere to the product and process review procedure whenever there are any significant changes to product composition or process parameters. This ensures that this facility always has accurate information concerning the wastes it receives from other Dow Corning locations.

If, upon initial inspection, any wastes received from off-site Dow Corning locations are not consistent in appearance, physical state, packaging or labeling with the expected parameters for that waste stream, the generating location is immediately contacted and an attempt is made to resolve the discrepancy. If the discrepancy can be resolved, the shipment is accepted if the following conditions are met:

- The waste is properly characterized;
- The waste is acceptable under the requirements of the facility's license; and
- The material can be safely stored and handled.

If the discrepancy cannot be resolved, then the shipment is promptly returned to the generator. This is determined by the following:

- The waste is not adequately characterized;
- The waste does not fall within the requirements of the facility permit; and
- The waste cannot be safely managed at the facility in the opinion of facility and Environmental Services Department personnel.

If an off-site waste is rejected, it is segregated in the 809 Building receiving area, located in the northeast extension of the building, until it can be shipped back to the generator.

A3.A.1(b) Subsequent Waste Shipment Procedures

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §§264.13(a)(3) and 264.13(b)(4)]


This facility does not receive hazardous wastes from off-site facilities except those which are majority owned by Dow Corning and are located in the U.S. Wastes from these locations are fully characterized in the corporate PDM system and Material Safety Data Sheets are available on the Dow Corning's systems network. This information is updated anytime the composition or generating process of a material is changed. The updates are carried out as part of a formal review process initiated during the planning stages for the creation or modification of any process or product. As part of this formal process, the composition, physical and chemical characteristics, and regulatory status, including RCRA characterization, are reviewed by qualified personnel. Because this constitutes all information required for safe handling and storage of these wastes, and includes complete information about the volatile organic content of each waste stream, re-analyses are performed on an as needed basis..

The requirements for chemical and physical analyses at hazardous waste management facilities is discussed in detail in Module A2, Chemical and Physical Analyses, Section A2.A.

A3.A.1(c) Additional Waste Analysis Requirements

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §§264.13(b)(6) and 264.13(c)(3)]

Dow Corning will review the PDM system information to ensure that the facility is authorized to receive the waste, and can manage the waste in compliance with the following:

 (Check as appropriate)

- | | |
|--|---|
| <input checked="" type="checkbox"/> R 299.9605 and 40 CFR §264.17 | General requirements for ignitable, reactive, or incompatible wastes, see below. |
| <input checked="" type="checkbox"/> R 299.9630 and 40 CFR §264.1034(d) | <input checked="" type="checkbox"/> R 299.9605 and 40 CFR §264.314
Special requirements for bulk and containerized liquids, see below. |
| <input type="checkbox"/> R 299.9631 and 40 CFR §264.1063(d) | Test methods and procedures (Subpart AA)
[Module C11, Subpart AA – not applicable] |
| <input checked="" type="checkbox"/> R 299.9627 and 40 CFR §268.7 | Test methods and procedures (Subpart BB)
[Module C11, Subpart BB] |
| <input checked="" type="checkbox"/> 40 CFR §264.1083 | Waste determination procedures (Subpart CC)
[Module C11, Subpart CC] |
| <input checked="" type="checkbox"/> R 299.9228 | Waste analysis and record keeping LDR Requirements
[Module A3, Sections A3.A.3, A3.B.3 and A3.C] |
| | Universal waste requirements
No testing is required to be performed by Dow Corning since all universal waste is sent off-site for recycling. |

Hazardous waste is no longer disposed of in the landfill. Only the following non-RCRA regulated materials are disposed of in the landfill:

- Non-RCRA regulated dirt; and
- Non-RCRA regulated scrap solids.

No wastes containing free liquids are disposed in the landfill and no lead contaminated (D008) hazardous wastes have been placed in the landfill since 1985. Paint filter liquid test is used to determine the presence of free liquids in a representative sample of waste and to determine compliance with 40 CFR 264.314 and R 299.9619(1). A predetermined amount of material is placed in a paint filter and if any portion of the material passes through and drops from the filter within the five minute test period, the material is deemed to contain free liquids.

Dow Corning does not store or treat hazardous wastes in surface impoundments at this facility.

Additional Requirements for Ignitable, Reactive, or Incompatible Wastes [40 CFR 264.13(b)(6) and 40 CFR 264.17]

No ignitable or reactive wastes are treated at the Dow Corning Facility. The prevention of accidental ignition of waste in the storage areas is ensured by the following:

- Refusing explosive wastes.
- Prohibiting smoking and open flames in the storage areas and also in the loading/unloading areas.
- Posting "No Smoking" signs.
- Protecting wastes from other sources of ignition such as cutting and welding, hot surfaces, frictional heat, sparks, etc.
- Advising employees of these prohibitions as part of the orientation training conducted prior to beginning employment.
- Providing fire extinguishers and a sprinkler system to ensure immediate response to fires.
- Using spark-proof equipment.

Potentially incompatible wastes are carefully managed to avoid accidental adverse reactions. The design of the storage areas allows reactive and incompatible wastes to be properly segregated and contained (see Module A6).

Parameters for Analysis and Rationale [40 CFR 270.14(b)(2), 264.13(b)(1), MAC R 299.9605]

Table A3-1, "Waste Parameters", lists the types of wastes stored and handled at this facility and the parameters necessary to properly characterize each type. Information on individual waste streams that fall within these waste types is obtained from the corporate PDM system and from Material Safety Data Sheets for the raw materials, process intermediates, products, laboratory materials and their hazardous constituents. The rationale for selection of parameters is discussed in Module A2, Chemical and Physical Analyses, Section A2.A.

Test Methods [40 CFR 270.14(b)(2), 264.13(b)(2), MAC R 299.9605]

Hazardous wastes managed at this facility are characterized based on thorough knowledge of the processes generating the wastes, the hazardous constituents of the wastes, and the physical and chemical characteristics of the raw materials, products and constituents. Chemical analysis of the wastes is generally not needed in order to adequately characterize them.

Occasionally, a waste may be generated that has not been adequately characterized by information already available, such as wastes obtained from removal of contaminated soils where the source of contamination is not well documented. In such a case, a representative sample would be taken of the waste and the waste would be analyzed by an independent laboratory, using approved methods as published in SW-846, "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", or equivalent methods approved by the Director, see Table A3-1. Most often this type of waste would be tested by the Toxicity Characteristic Leachate Procedure (TCLP) by an independent laboratory approved by Dow Corning.

Sampling Methods [40 CFR 270.14(b)(2), 264.13(b)(3), MAC R 299.9605]

Wastes routinely handled and stored by this facility are not normally sampled, since they have already been thoroughly characterized. Occasionally, a waste may be generated that has not been adequately characterized by information already available, such as wastes obtained from removal of contaminated soils where the source of contamination is not well documented. In such a case, a representative sample would be taken of the waste using approved methods as published in SW-846, "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", or equivalent methods approved by the Director. Appropriate sampling methods are listed in Table A3-1, located at the end of this Section.

Wastes routinely handled and stored by this facility are not normally sampled, since they have already been thoroughly characterized. However, if required, the sampling methods for the applicable bulk and containerized wastes are described below. These methods were selected for their simplicity, ability to detect unacceptable wastes, ability to obtain a representative sample, and consistency with U.S. EPA test methods. All samples collected at the facility will be obtained by trained personnel.

No sampling of solid waste is currently performed at the Dow Corning facility. If in the future, sampling of solids is needed; approved methods as published in SW-846 based on the waste stream will be used.

Sampling Methods for 809 Container Storage Area

For each container sampled by Dow Corning's designee, a single sample that represents the entire depth of the container along its axis will be obtained. Equipment commonly used for sampling containerized waste include composite liquid waste samplers (COLIWASAs).

A COLIWASA is a glass, plastic or metal tube with an end closure that can be opened and closed while the tube is submerged. The COLIWASA is useful for sampling free flowing liquids, slurries, and wastes that consist of several immiscible liquid phases. The COLIWASA is lowered into the waste at a rate slow enough to permit the level of liquid inside and outside the sampler to remain the same. When the sampler hits the bottom, the stopper is closed. In this manner, a sample will be obtained that is representative of the entire depth of the waste.

The above sampling method is detailed in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," (U.S EPA Office of Water and Waste Management, SW-846). Other sampling methods if used at the Dow Corning facility may include process knowledge and methods detailed in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," (U.S EPA Office of Water and Waste Management, SW-846).

Sampling Methods for the 806 Tank Farm

The waste materials in the tanks are piped to a bulk tanker for off-site disposal. Bulk tankers if required will be sampled by Dow Corning's designee in a manner which ensures that the samples are representative. A composite liquid waste sampler (COLIWASA) can be used to sample non-homogeneous or stratified liquid. This method is summarized above and described in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," (U.S EPA Office of Water and Waste Management, SW-846).

A3.A.2 Waste Acceptance Procedures

[R 299.9605(1) and R 299.9504(1)(c), and 40 CFR §§264.13(c), 264.72(a) and (b), and 264.73(b)]

Waste shipments arrive at the facility in the following containers:

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Drums | <input checked="" type="checkbox"/> Totes | <input checked="" type="checkbox"/> Tanker trucks |
| <input type="checkbox"/> Carboys | <input type="checkbox"/> Wrangler box | <input checked="" type="checkbox"/> Filter bags |
| <input checked="" type="checkbox"/> Roll-off boxes | <input checked="" type="checkbox"/> Vacuum trucks | <input type="checkbox"/> Other: <u>[describe]</u> |

Upon receipt of wastes from an off-site generator, Dow Corning will perform all of the following tasks:

- Review paperwork;
- Visually inspect the waste; and
- Perform waste screening/fingerprint analysis of waste.

These tasks are discussed below.

A3.A.2(a) Review Paperwork

[R 299.9605(1) and R 299.9504(1)(c), and 40 CFR §§264.13(c), 264.72(a) and (b), and 264.73(b)]

Dow Corning will review all paperwork, including manifests and LDR notifications, before any wastes are accepted by the facility. Dow Corning will review all paperwork for completeness. In addition, the manifest and LDR notification will be compared for consistency. The manifest will also be compared to the PDM system and analytical information provided by the generator and to the waste shipment to ensure the accuracy of information provided on shipment paperwork. The manifest will also be compared to the number of containers, the volume, and/or the weight of the waste in the shipment. All discrepancies will be resolved before processing the waste.

Manifest System [MAC R 299.9504(17), 299.9608]

The licensed facility may receive hazardous wastes from other Dow Corning locations and subsidiaries, and shipments of discarded Dow Corning products which are accompanied by a hazardous waste manifest. Wastes received from other areas of the Dow Corning Midland plant are not accompanied by a manifest because these are transfers within the same facility. When the licensed facility receives a shipment of hazardous wastes accompanied by a hazardous waste manifest, a facility representative does each of the following:

1. Sign and date the manifest in the space provided for the facility, to certify that the hazardous waste described on the manifest was received;
2. Note any significant discrepancies between the type and/or quantity of waste received and the type and/or quantity of waste described on the manifest by recording the discrepancy on each copy of the manifest;
3. Immediately give the transporter at least one copy of the manifest;
4. Send a signed copy of the manifest to the generator of the waste within 30 days;
5. Retain a copy of each manifest at the facility for a minimum of three years after the receipt of the shipment;
6. Send a copy of each manifest to the Director of DNRE or other person designated by the Director within the first ten days of the next calendar month beginning immediately after the receipt of the waste.

This facility does not receive bulk shipments from rail or water transporters. This facility does not receive shipments of hazardous wastes imported from foreign countries.

Manifests for Hazardous Wastes Shipped from the Facility [MAC R 299.9608(3)]

Each shipment of hazardous waste shipped from this facility to off-site treatment, storage or disposal facilities is accompanied by a hazardous waste manifest that contains the following information:

1. The date the shipment was initiated;
2. A unique manifest document number;
3. The name, mailing address, telephone number, and U.S. EPA Identification Number of this facility in the spaces provided for generator information;
4. The name and U.S. EPA Identification Number of the transporter;
5. The name, address, telephone number, and U.S. EPA Identification Number of the destination facility;
6. A D.O.T. Basic Shipping Description for each type of waste shipped;
7. The number and type of container for each hazardous waste;
8. The quantity of each hazardous waste and the units of measure;
9. The U.S. EPA hazardous waste codes for each hazardous waste shipped;
10. The signature of a representative of this facility and the date signed, in the space provided for the "Generator Certification".

Manifest Discrepancies [MAC R 299.9608(4)]

The licensed facility receives shipments of hazardous wastes accompanied by manifests from off-site Dow Corning locations and subsidiaries, and shipments of discarded Dow Corning products. For these shipments, if a significant discrepancy is discovered between the type and/or quantity of waste received and the type and/or quantity of waste described on the manifest, Dow Corning promptly contacts the generator of the waste by telephone or other means and attempts to resolve the discrepancy. If the discrepancy is not resolved within 15 days, Dow Corning immediately submits, to the Director of Michigan DNRE and to the Regional Administrator of U.S. EPA, Region 5, a letter describing the discrepancy and the facility's attempts to reconcile it, with a copy of the manifest.

A significant discrepancy in quantity of wastes is a difference of more than 10% between the quantity of a bulk shipment received and the quantity manifested, or any difference in piece count for shipments of non-bulk, containerized wastes. A significant discrepancy in type of waste is one which can be discovered by inspection or analysis of the waste, such as substitution of waste acid for waste solvent, or the presence of toxic constituents requiring U.S. EPA waste codes not reported on the manifest.

A3.A.2(b) Visual Inspection of Waste
[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(c)]

Dow Corning will visually inspect a minimum of one container and up to a maximum of 10 percent of the containers from each generator. The contents of the container will be visually inspected for the following:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Color | <input type="checkbox"/> Consistency |
| <input checked="" type="checkbox"/> Physical state | <input type="checkbox"/> Other: <u>[describe]</u> |
| <input type="checkbox"/> pH | |

Visual observations will be recorded and compared to the PDM system information. All discrepancies will be resolved before processing the waste.

If, upon initial inspection, any wastes received from off-site Dow Corning locations are not consistent in appearance, physical state, packaging or labeling with the expected parameters for that waste stream, the generating location is immediately contacted and an attempt is made to resolve the discrepancy. If the discrepancy can be resolved, the shipment is accepted if the following conditions are met:

- The waste is properly characterized;
- The waste is acceptable under the requirements of the facility's license; and
- The material can be safely stored and handled.

If the discrepancy cannot be resolved, then the shipment is promptly returned to the generator. This is determined by the following:

- The waste is not adequately characterized;
- The waste does not fall within the requirements of the facility permit; and

- The waste cannot be safely managed at the facility in the opinion of facility and Environmental Services Department personnel.

If an off-site waste is rejected, it is segregated in the 809 Building receiving area, located in the northeast extension of the building, until it can be shipped back to the generator.

A3.A.2(c) Waste Screening/Fingerprinting
[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §§264.13(b)(14) and 264.13(c)(2)]

Table A3-1 lists the waste analysis procedures, including screening parameters for each hazardous waste, the rationale for the selection of these parameters, test methods that will be used to test for these parameters, the appropriate reference, and whether the waste is specified in R 299.9216. The frequency of waste screening will be performed on an as needed basis. The rationale for frequency and selection of parameters is discussed in Module A2, Chemical and Physical Analyses, Section A2.A. The sampling methods that will be used to obtain a representative sample of the waste to be analyzed and the sampling equipment are included in Table A3-1 and the rationale is included in Section A3.A.1(c) of this module. The results of the waste screening/fingerprint analysis will be compared to the PDM system information and analytical results provided by the generator during the initial waste characterization process.

The outside container of inner laboratory pack containers will be 100 percent visually inspected. Containers of personal protective equipment (PPE) or debris will undergo visual inspection. All discrepancies will be resolved before processing the waste.

U.S. EPA test methods are used by Dow Corning vendors for chemical and physical analyses of representative samples. Process knowledge at Dow Corning is utilized to characterize waste and changes in process are strictly monitored. The PDM system characterizes waste and then internal Material Safety Data Sheets (MSDS) and labels are generated. The waste is then shipped to vendors and the waste profiling is performed by the vendors using U.S. EPA test methods.

A3.A.3 Procedures to Ensure Compliance with Land Disposal Restrictions (LDR) Requirements [R 299.9627 and 40 CFR, Part 268]

All shipments of wastes subject to LDR received at the facility will be accompanied by appropriate generator notification and LDR notification in accordance with R 299.9627 and 40 CFR §268.7. The LDR notification accompanying generator wastes will be reviewed, and any discrepancies in the LDR notification and the associated manifest, analytical records, or PDM system information will require shipment rejection unless additional, satisfactory, clarifying information is provided by the generator. All information obtained to document LDR compliance will be maintained in the facility operating record until closure of the facility.

In accordance with the LDR regulations, all wastes shipped off site will be analyzed, or generator knowledge will be used when appropriate, to determine whether the waste meets the applicable LDR treatment standards specified in R 299.9627 and 40 CFR §§268.41-43. All analytical results will be maintained in the facility operating record until closure of the facility. Wastes that are determined through analysis to meet treatment standards as specified in R 299.9627 and 40 CFR §268.41-43 will be disposed of in methods approved by the above listed regulations.

Dow Corning will supply LDR notifications and certification, including appropriate analytical records to support the certification, to the receiving facility with each shipment of waste. The notifications and certifications will contain the information required under R 299.9627 and 40 CFR §268.7. Any additional data obtained from the generators (e.g., original LDR notifications or analysis provided by generators) will be provided to the licensed TSD facility where the waste will be sent.

A3.A.3(a) Spent Solvent and Dioxin Wastes

[R 299.9627 and 40 CFR §§264.13(a)(1), 268.7, 268.30, 268.31, 268.40, 268.41, 268.42, and 268.43]

Spent solvent wastes (F001-F005) are accepted at the facility. Generator process knowledge will be used to determine the presence of spent solvent wastes (F001-F005). Generator process knowledge will be documented on the waste material profile report and LDR notification. The LDR notification will provide additional information regarding the appropriate treatment standards for the waste and whether it has already been treated to the appropriate standards.

Hazardous wastes which contain spent solvents and are listed in 40 CFR Subpart D as F001-F005 spent solvent wastes are identified by Dow Corning's thorough knowledge of the composition and generating process of each waste. With the initial shipment of these wastes to any off-site treatment, storage, or disposal facility, a written notification is provided listing the applicable waste codes and the regulated solvent constituents reasonably believed to be present in the waste. This notification is repeated if the composition of the waste changes in such a way that the information contained in the notification is affected, or if the waste is sent to a different facility.

For hazardous wastes received from other, off-site Dow Corning operations and carrying F001-F005 waste codes, this same type of notification is obtained with the first shipment and whenever there is a change in the nature of the waste that would affect the information included in the notification.

No F020-F023 or F026-F028 dioxin-containing wastes are managed at this facility.

A3.A.3(b) Listed Wastes

[R 299.9627, R 299.9213, and R 299.9214 and 40 CFR §§264.13(a)(1), 268.7, 268.33, 268.34, 268.35, 268.36, 268.39, 268.40, 268.41, 268.42, and 268.43]

Generator process knowledge will be used to determine whether listed waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. In accordance with R 299.9627 and 40 CFR §268.41, where treatment standards are based on concentrations in the waste extract, the facility will use toxicity characteristic leaching procedures (TCLP) to determine if wastes meet treatment standards. Generator process knowledge will be documented on the waste material profile report and LDR notification. No wastes are treated on-site and/or disposed of on-site.

A3.A.3(c) Characteristic Wastes

[R 299.9627, R 299.9208, and R 299.9212 and 40 CFR §§261.3(d)(1), 264.13(a)(1), 268.7, 268.9, 268.37, 268.40, 268.41, 268.42, 268.43 and Part 268, Appendix I and Appendix IX]

Generator process knowledge will be used to determine whether characteristic waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. In accordance with R 299.9627 and 40 CFR §268.41, where treatment standards are based on concentrations in the waste extract, generators shipping waste to the facility will determine if their wastes meet treatment standards.

In addition, the Generator process knowledge will be used to identify the underlying hazardous constituents that are expected to be present in the waste. Generator process knowledge will be documented on the waste material profile report and LDR notification. No wastes are treated on-site and/or disposed of on-site.

Most wastes managed by this facility are characterized based on Dow Corning's thorough knowledge of the waste composition and generating process, as described above. On the basis of this characterization, all applicable U.S. EPA waste codes are assigned to each hazardous waste and the determination is made for each hazardous waste as to whether or not the waste meets the treatment standards at 40 CFR 268.40, 268.45 or 268.49.

For those occasional wastes for which there is not sufficient information available for complete characterization of appropriate treatment standards, the waste is tested using methods in U.S. EPA publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," or equivalent test methods approved by the Director. This testing is usually performed by independent, outside laboratories that have been evaluated and approved by Dow Corning. Concentrations of hazardous constituents are determined either as the total concentration in the waste or using an extract of the waste, as appropriate to the type of waste being tested and the applicable treatment standard. The determination of which wastes may require additional characterization beyond the information available in the company's PDM system is the responsibility of the Environmental Services Manager or his designee.

If, based on either knowledge of the waste or on testing, it is determined that any hazardous waste does not meet the treatment standard(s) for any hazardous characteristics, an initial written notification with the first shipment of that waste is provided to any treatment, storage or disposal facility receiving the waste. This notification includes, at a minimum, the following information:

1. A statement that the waste is restricted from land disposal without further treatment.
2. The applicable wastewater or non-wastewater category for the waste.
3. Waste analysis data, when available.
4. For hazardous debris that may be treated using the alternative debris standards under 40 CFR 268.45, the contaminants subject to treatment and an indication that these contaminants are being treated subject to the standards at 40 CFR 268.45.
5. For contaminated soils subject to treatment standards under 40 CFR 268.49, a list of the hazardous constituents in 40 CFR 268.48(d) present in the waste and the following statement: "This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste

and [is subject to/complies with] the soil treatment standards as provided by 268.49(c) or the universal treatment standards.”

6. For contaminated soils to be treated under the standards at 40 CFR 268.49, the following certification is provided:

“I certify under penalty of law that I personally have examined this contaminated soil and it [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and requires treatment to meet the soil standards as provided by 268.49(c).”

If, based on either knowledge of the waste or on testing, it is determined that a hazardous waste does meet the applicable treatment standards for all hazardous characteristics, an initial written notification with the first shipment of that waste is provided to any treatment, storage or disposal facility receiving the waste. This notification includes, at a minimum, the following information:

1. The applicable wastewater or non-wastewater category for the waste.
2. Waste analysis data, when available.
3. The following certification:

“I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR part 268 subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.”

If the nature of any waste changes in such a way as to affect the information contained in the notification, or if the waste is shipped to a different facility, a new notification is provided with the first shipment of the waste after the change has occurred.

For any hazardous wastes which are D001 Ignitable, high total organic carbon (TOC) non-wastewaters, for which the treatment standards listed in 40 CFR 268.40 are combustion (CMBST), recovery of organics (RORGS), or polymerization (POLYM), these treatment standards takes precedence over any treatment standards for applicable waste codes listed in 40 CFR 261 Subpart D. For all other characteristic wastes, if the waste is also a listed waste with a treatment standard for the same constituent(s), the treatment standard(s) for the listed waste code(s) takes precedence over the treatment standard(s) for the constituent(s) which cause the waste to exhibit the characteristic(s).

For hazardous wastes exhibiting a characteristic under 40 CFR 261 Subpart C, other than D001 Ignitability, non-wastewater, high TOC subcategory, the presence of any underlying hazardous constituents is determined and this information is provided in written notification to the receiving facility.

Because no hazardous wastes are treated at this facility, no characteristic wastes which were once hazardous but now meet the treatment standards are shipped to RCRA Subtitle D landfills for disposal. Therefore, the notification requirement for this type of waste is not applicable to this facility.

For hazardous wastes received from other, off-site Dow Corning operations, this same type of notification is obtained with the first shipment and whenever there is a change in the nature of the waste that would affect the information included in the notification.

A3.A.3(d) Radioactive Mixed Waste

[R 299.9627 and 40 CFR §§268.7, 268.35(c), 268.35(d), 268.36, and 268.42(d)]

The facility does not accept radioactive mixed waste.

OR

Generator process knowledge will be used to determine whether a radioactive mixed waste meets the applicable treatment standard.

A3.A.3(e) Leachates

[R 299.9627 and 40 CFR §260.10 and 40 CFR §§268.35(a) and 268.40]

The facility does not accept single-source or multi-source F039 leachates.

OR

Single-source leachate will not be combined to produce multi-source leachates.

A3.A.3(f) Laboratory Packs

[R 299.9627 and 40 CFR §§268.7 and 268.42(c) and Part 268, Appendix IV and Appendix V]

The facility does not accept laboratory packs.

OR

The laboratory packs accepted at the facility are not land disposed.

Generator process knowledge will be used to determine whether characteristic waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. No hazardous wastes are treated on-site and/or disposed of on-site.

If a laboratory pack hazardous waste is combined with non-laboratory pack hazardous waste prior to or during treatment, the entire mixture will be treated to meet the most stringent treatment standards for each waste constituent before being land disposed.

A3.A.3(g) Contaminated Debris

[R 299.9627 and 40 CFR §§268.2(g), 268.7, 268.9, 268.36, 268.45, and 270.13(n)]

The hazardous debris categories and the contaminant categories associated with the types of hazardous debris accepted at the facility are presented in Table.

Hazardous debris accepted at the facility that exhibits the characteristics of ignitability, corrosivity, or reactivity will be treated using one of the extraction, destruction, or immobilization technologies identified in Table 1 of 40 CFR §268.45.

OR

- Contaminated debris is not accepted at the facility.

Various contaminated debris (contaminated dirt, clean-out materials from various tanks, etc.) is accepted at the facility and is transferred off-site to other treatment facilities; it is not treated on site. Solid wastes not regulated as hazardous wastes under RCRA which may be disposed in the landfill include: RCRA-empty containers; containers of non regulated gloves, rags, pieces of metal and glass and other debris; column packing; cleaned process equipment; asbestos; construction debris; solidified silicone sealants, rubber and gums; solidified polysiloxane gels; nonhazardous contaminated dirt; and used office furniture.

A3.A.3(h) Waste Mixtures and Wastes with Overlapping Requirements

[R 299.9627 and 40 CFR §§264.13(a), 268.7, 268.41(b), 268.43(b), and 268.45(a)]

Generator process information and analytical data will be used to demonstrate that those waste mixtures and wastes with multiple codes are properly characterized. Each waste that has more than one characteristic or a listed Reactivity Group Number (RGN) will be identified with a number for each characteristic. Waste identified as meeting a listing and exhibiting a characteristic will be primarily identified with the listed waste code for the purpose of manifesting, etc.

A3.A.3(i) Dilution and Aggregation of Wastes

[R 299.9627 and 40 CFR §268.3]

Listed wastes, if destined for land disposal, may not be diluted from the point of generation to the point of land disposal. Characteristic wastes may only be diluted if, (1) the waste is managed in a Clean Water Act (CWA)/CWA-equivalent surface unit or a Class I Safe Drinking Water Act injection well, (2) the waste has a concentration-based treatment standard or is treated using the DEACT technology-based treatment standard, and (3) the waste is not a D003 reactive waste. [Note: these requirements may change in the future. At that time, this module may be amended.]

The facility may not dilute or partially treat a listed waste to change its treatability category (i.e., from non wastewater to wastewater), in order to comply with different treatment standards. If the wastes are all legitimately amenable to the same type of treatment to be performed, the facility may aggregate wastes for treatment.

A3.B CAPTIVE FACILITY

- [Facility Name] generates waste on site. [Facility Name] does not receive waste generated off site.

OR

Dow Corning generates waste on site. Dow Corning also receives waste generated off site. Waste screening procedures for receiving wastes from off-site generators is discussed in Section A3.A.

All sections in 3.B are addressed in Section 3.A.

No hazardous waste is treated at the facility.

In accordance with R 299.9609 and 40 CFR §264.73 and Part 264, Appendix I, Dow Corning will retain all records and results of waste determinations performed as specified in 40 CFR §§264.13, 264.17, 264.314, 264.1034, 24.1063, 264.1083, 268.4(a), and 268.7 in the facility operating record until closure of the facility.

A3.C NOTIFICATION, CERTIFICATION, AND RECORDKEEPING REQUIREMENTS

[R 299.9627 and R 299.9609 and 40 CFR §§264.73, 268.7, and 268.9(d)]

Dow Corning will perform the following procedures for preparing and/or maintaining applicable notifications and certifications to comply with LDRs:

A3.C.1 Retention of Generator Notices and Certifications

[R 299.9627 and 40 CFR §268.7(a)(7)]

Dow Corning will retain a copy of all notices, certifications, demonstrations, data, and other documentation associated with compliance to LDRs. The records that are maintained at this facility, with the minimum record retention period for each, are shown in Table B8-1 of Module B8.

The following notices and certifications submitted by the initial generator of the waste will be reviewed and maintained:

- Notices of restricted wastes not meeting treatment standards or exceeding levels specified in RCRA §3004(d), including the information listed in R 299.9627 and 40 CFR §268.7(a)(1).
- Notices of restricted wastes meeting applicable treatment standards and prohibition levels, including the information in R 299.9627 and 40 CFR §268.7(a)(2).

A3.C.2 Notification and Certification Requirements for Treatment Facilities

[R 299.9627 and 40 CFR §268.7(b)]

This facility does not treat hazardous wastes for the purpose of meeting land disposal restriction treatment standards, so this section does not apply.

A3.C.3 Waste Shipped to Subtitle C Facilities

[R 299.9627 and 40 CFR §§268.7(a) and 268.7(b)(6)]

The facility does not ship waste to Subtitle C facilities.

OR

- For restricted waste or waste treatment residues that will be further managed at a Subtitle C (hazardous waste management) facility, the facility will submit notifications and certifications in compliance with the notice and certification requirements applicable to generators under R 299.9627 and 40 CFR §268.7(a). Each shipment of waste to be transported off site to a RCRA-authorized Subtitle C TSD facility will include a written notification and certification that the waste either meets or does not meet applicable treatment standards of prohibition levels.

A3.C.4 Waste Shipped to Subtitle D Facilities
[R 299.9627 and 40 CFR §§268.7(d) and 268.9(d)]

- The facility does not ship waste to Subtitle D facilities.

OR

- If the facility ships [Insert type of waste (e.g., hazardous debris or characteristic waste)] to a Subtitle D facility, the facility will submit a one-time notification and certification for characteristic wastes, or listed wastes that are listed only because they exhibit a characteristic, that have been treated to remove the hazardous characteristic and are no longer considered hazardous. The facility will place a certification and all treatment records in the facility's file and send a notification and certification to the Director, or delegated representative, describing the wastes and applicable treatment standards and identifying the Subtitle D (solid waste management) disposal facility receiving the waste. On an annual basis, the notification and certification will be updated and refiled if the process or operation generating the waste changes and/or if the Subtitle D facility receiving the waste changes.

A3.C.5 Recyclable Materials
[R 299.9627 and 40 CFR §268.7(b)(7)]

- The facility does **not accept** recyclable materials used in a manner constituting disposal.

OR

- For wastes that are recyclable materials used in a manner constituting disposal, in accordance with R 299.9206 and 40 CFR §266.20(b), the facility will submit a notice and certification to the Director, or delegated representative, with each shipment of waste describing the waste and applicable treatment standards and identifying the facility receiving the waste.

A3.C.6 Record Keeping
[R 299.9608(4), R 299.9609, R 299.9610(3), and R 299.9627 and 40 CFR §§264.72, 264.73, 268.7(a)(5), 268.7(a)(6), 268(a)(7), and 268.7(d)]

Dow Corning maintains a facility operating log in accordance with R 299.9609 and 40 CFR §264.73. The operating log consists of the following:

- Common name of waste;
- U.S. EPA waste codes;
- Physical form of waste;

- Generating process (for unlisted wastes);
- Estimated or manifested weight, or volume and density;
- Dates placed in and removed from storage;
- Date of disposal (if applicable);
- Location and quantity of each waste placed in the landfill;
- Location and quantity of each waste in storage; and
- Manifest numbers for all wastes received or shipped using a manifest.

Copies of all necessary notifications and certifications, as well as relevant inspection forms and monitoring data, are also maintained on file at the facility. Files will be maintained for a minimum of three years (for inspection records and LDR notification), or until facility closure (for inventory records).

If a significant manifest discrepancy is discovered (such as variation in one-piece count or misrepresentation of the type of waste or corrosive rather than flammable) that cannot be resolved with the generator or transporter within 15 days of receipt, facility personnel will submit to the Director and Regional Administrator a letter describing the discrepancy and all attempts to reconcile the discrepancy. The letter will include a copy of the discrepant manifest or shipping document.

Recycling facilities: The facility will keep records of the name and location of each entity receiving a hazardous waste derived product.

Facilities managing a restricted waste that is excluded from the definition of a hazardous or solid waste or exempt from Subtitle C regulations: The facility will place a one-time notice in the facility files describing the generation, basis for exclusion or exemption, and disposal of the waste. For each shipment of treated debris, the facility will place a certification of compliance with applicable treatment standards in the facility's files.

A3.C.7 Required Notice
[R 299.9605(1) and 40 CFR §264.12(a) and (b)]

This facility does not receive shipments of hazardous wastes from a foreign source.

Table A3-1

Waste Parameters

**Table A3-1
Waste Parameters
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Parameter / Equipment/ Method	Frequency
Group 1: Ignitable and Reactive Liquids			
1.a. Chlorosilanes (Si-Cl compounds), vinyl silanes and acetoxysilanes, also containing any of the following: aromatic solvents, aliphatic hydrocarbons, chlorinated solvents, acetic acid, acetyl chloride	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F002, F003, F005 Michigan codes 001D, 003D, 002U, 041U	Flashpoint: Pensky-Martens closed cup, SW-846 Method 1010 Corrosivity: Electrometric, SW-846 Method 9040 Reactivity: Based on generator knowledge of chemical characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: characterized based on generator knowledge of constituents and generating process.	As needed and based on generator knowledge of constituents and process.
1.b. Alkoxysilanes (Si-O-CH ₃), containing aliphatic and aromatic solvents, alcohols	D001, D003, F003, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
1.c. Silanes (Si-H), also containing aliphatic, aromatic and/or chlorinated solvents, and/or other monomers, including acetonitrile	D001, D003, D039, F002, F003, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of waste characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
1.d. Silazanes and Aminosilanes, containing aliphatic and/or aromatic solvents	D001, D003, F003, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.

**Table A3-1
Waste Parameters (continued)
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Parameter / Equipment/ Method	Frequency
Group 2: Ignitable and Reactive Solids			
2.a. Solids, soils and/or debris containing chlorosilanes	D001, D003, D004, D005, D007, D008, D011, D018, D019, D021, D022, D035, D039, D040, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U008, U009, U019, U031, U035, U037, U040, U044, U045, U055, U056, U069, U075, U080, U092, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U123, U133, U134, U140, U144, U151, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan 001D, 003D	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
2.b. Solids, soils and/or debris containing alkoxy silanes	D001, D003, F003, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics Listed wastes: generator knowledge	As needed and based on generator knowledge of constituents and process.
2.c. Solids, soils and/or debris containing silanes (Si-H)	D001, D003, D039, F002, F003, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
2.d. Solids, soils and/or debris containing silazanes and/or aminosilanes	D001, D003, F003, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
2.e. Magnesium solids	D001, D003	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Reactivity: Based on generator knowledge of chemical characteristics	As needed and based on generator knowledge of constituents and process.

**Table A3-1
Waste Parameters (continued)
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Parameter / Equipment/ Method	Frequency
Group 3: Lab Packs			
3.a. Ignitable, acidic corrosive and reactive lab packs	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Corrosivity: Electrometric, SW-846 Method 9040 Reactivity: Based on generator knowledge of chemical characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
3.b. Ignitable, basic corrosive lab packs	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Corrosivity: Electrometric, SW-846 Method 9040 Reactivity: Based on generator knowledge of chemical characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.

**Table A3-1
Waste Parameters (continued)
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Parameter / Equipment/ Method	Frequency
Group 3: Lab Packs (Continued)			
3.c. Ignitable lab packs	D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F001, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
3.d. Acidic corrosive lab packs	D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F001, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Corrosivity: Electrometric, SW-846 Method 9040 Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
Group 4: Ignitable, acidic corrosive wastes			
4.a & 4.b. Ignitable, acidic corrosive liquids & solids	D001, D002	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Corrosivity: Electrometric, SW-846 Method 9040	As needed basis

Table A3-1
Waste Parameters (continued)
Dow Corning Corporation, Midland, Michigan

Type of Waste	EPA Codes	Parameter / Equipment/ Method	Frequency
Group 5: Solvent wastes			
5.a. Ignitable mixed solvents	D001, D018, D019, D021, D022, D035, D039, D040, F001, F002, F003, F004, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
5.b. Solvent contaminated solids	D018, D019, D021, D022, D035, D039, D040, F001, F002, F003, F004, F005	Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
5.c. Solvent contaminated water	D001, D018, D019, D021, D022, D035, D039, D040, F001, F002, F003, F004, F005	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
Group 6: Discarded virgin raw materials			
6.	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Flashpoint: Pensky-Martens closed cup, SW-846 1010 Corrosivity: Electrometric, SW-846 Method 9040 Reactivity: Based on generator knowledge of chemical characteristics Toxicity: TCLP, SW-846 Method 1311 Listed wastes: generator knowledge of waste	As needed and based on generator knowledge of constituents and process.
Group 7: Metals contaminated solids			
7.a. Lead contaminated solids	D008	Toxicity: TCLP, SW-846 Method 1311	As needed basis
7.b. Mercury contaminated solids	D009	Toxicity: TCLP, SW-846 Method 1311	As needed basis

**Table A3-1
Waste Parameters (continued)
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Parameter / Equipment/ Method	Frequency
Group 8: Non-RCRA regulated materials			
RCRA-empty containers	None	None	As needed basis
Non-RCRA regulated dirt	None	None	As needed basis
Non-RCRA regulated scrap solids (rags, pieces of metal and glass, asbestos & construction debris, column packing, used office furniture)	None	None	As needed basis
Containers of non regulated gloves	None	None	As needed basis
Cleaned process equipment	None	None	As needed basis
Solidified silicone sealants & polysiloxane gels	None	None	As needed basis
Rubber & gums	None	None	As needed basis

Product Data Management Overview

Product Data Management Overview

The following data fields are gathered as part of Dow Corning's Product Data Management (PDM) System. These data fields are equivalent to the data fields in a typical waste profile form. These data fields are:

1. Review of History- Who and When changes were made to the document
2. Technical Change Information-What was changed.
3. Business Information
 - a. Intended Use
 - b. Method of Application
 - c. Generic Description
 - d. Business intended use
 - e. Business Restrictions
 - f. Qualified Manufacturing/Packaging/Risk Management use sites
4. Product Steward Comment
5. Business Approval Comment
6. Summary of Comments from Notification
 - a. Steward comments
 - b. Business comments
 - c. Site comments
 - d. Other comments
7. Raw Materials Information
8. Formaldehyde Regulation
9. Physical Properties
10. Formulation
11. Process Description-Short description of the process chemistry involved.
12. Dow Corning Chemical Composition
13. Chemical Inventory Status
14. Regulatory comments and restrictions
15. RCRA requirements
 - a. Europe
 - b. Asia
 - c. Inter/America
16. Health, Environmental Organization (HEO) Request
17. Health and Environmental Review
18. Storage Conditions
19. Age Control
20. Sampling Requirements
21. List of Tests Required (LAR)