

CHECKLIST FOR SPECIAL WASTE APPLICATION EVALUATIONS

This checklist is to be used with SWM-SWP-P-144- Special Waste Evaluations SOP to assist DSWM staff in special waste application/recertification evaluations. See Section 7 of the SOP for the details. This is not regulations.									
Generator Name		Name of Special Waste		Reviewer Name		Review Date			
Date Received		Date Determined to be Complete		Recommendation (Mark with ✓ as appropriate)					
				Issue NOD	Non-Special Waste	Approve	Deny		
See page 12 of the SOP for the locations of the D, F, K, P and U HW Codes in the Rule including Rule page numbers.									
STEP	Question						Mark with ✓		
							YES	NO	HW
1	Is the application/recertification for multiple types of wastes or requests to dispose of a waste(s) with free liquids not in compliance with Rule 0400-11-01-.04(2)(k)2 in a landfill? If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies concerning incomplete sections of or attachments to the application/recertification and proceed to Step 2. At this point staff may not be able to determine all applicable attachments necessary.								
2	Did the applicant request to dispose of the special waste at a permitted Class I Disposal Facility ? If yes, proceed to Step 7. Otherwise proceed to Step 3.								
3	Did the applicant request to dispose of the special waste at a permitted Class II Disposal Facility , is the waste from a facility that the permit authorizes the Class II Disposal Facility to receive, is similar to the type of wastes the facility is permitted to receive, and the Class II Disposal Facility's permit does not prohibit the disposal of this waste? If yes, proceed to Step 7. If no, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise proceed to Step 4.								
4	Did the applicant request to dispose of the special waste at a permitted Class III Disposal Facility , is the waste similar to the type of wastes the facility is permitted to receive, and the Class III Disposal Facility's permit does not prohibit the disposal of this waste? If yes, proceed to Step 7. If no, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise proceed to Step 5.								
5	Did the applicant request to dispose of the special waste at a permitted Class IV Disposal Facility , is the waste similar to the type of wastes the facility is permitted to receive, and the Class IV Disposal Facility's permit does not prohibit the disposal of this waste? If yes, proceed to Step 7. If no, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise proceed to Step 6.								
6	Did the applicant request to ship the special waste to a TN permitted Solid Waste Processing Facility , and the facility's notification: 1) describes special procedures and/or equipment utilized to adequately confine and segregate the special waste; and 2) does not prohibit the facility from receiving the special waste? If yes proceed to Step 7. Otherwise, the FOSWR drafts a denial letter and proceeds to Step 36.								
7	Did the applicant mark that the waste is a HW ? If yes, the FOSWR drafts a denial letter and proceeds to Step 36. HW staff need to inspect the generating facility if located in Tennessee. If no, proceed to Step 8.								
8	Is the waste a combustion waste ? If no, proceed to Step 9. If yes, determine if the application/recertification describes: 1) The combustion unit (boiler, incinerator, etc.); and 2) All the fuel and any waste combusted in the unit. If the unit is combusting any waste, then an adequate HW determination for all wastes combusted in the unit is required. If the generator is combusting HW then contact DDFO and HW Program Manager for direction. Otherwise note all deficiencies and proceed to Step 28.								
9	Is the waste contaminated environmental media ? If no, proceed to Step 10. Otherwise determine if the application/recertification describes how the environmental media was contaminated (if known) and identifies all of the contaminant constituents. The SOP on page 14 provides suggested minimum number of soil samples. Please see DSWM Guidance Number 026 for the Disposal of Petroleum Contaminated Soil and Debris in Class I Landfills. Steps 10 through 27 assists in determining if a contaminant constituent(s) is a listed HWs and Step 28 assist in determining if it exhibits the characteristic of a HW. If the environmental media contains a listed HW [and a successful determination is not made under the DSWM's Contaminated Soil "Contained-In" Determination Guidance for Disposal] OR the contamination in the soil results in it exhibiting a characteristic of a HW, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 10.								
10	Is the waste or does it contain a " Commercial Chemical Product or Manufacturing Chemical Intermediate " or " Off-Specification Commercial Chemical Products or Manufacturing Chemical Intermediates " meeting any of the listing definitions for P or U HW? If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 11.								
11	Does the waste contain cyanide ? If no, proceed to Step 12. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for F or K HW. If yes, FOSWR drafts denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 12.								

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		YES	NO	HW
12	Is the waste a still bottoms or resulting from processing/treating of a still bottom? If no, proceed to Step 13. If yes, determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for F or K HW. If the waste is a listed HW (except for F003), the FOSWR drafts a denial letter and proceeds to Step 36. F003 still bottoms that do not exhibit the characteristic of ignitability are not a listed F003 HW but the waste must meet LDR [HW Rule 0400-12-01-.10]. If this waste does not meet LDRs, FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 13.			
13	Is the waste a pesticide waste or contain a pesticide waste? If no, proceed to Step 14. Otherwise determine if the waste [or waste processed/treated generating the waste] meets a listing definition for a F, K, P, or U. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 14.			
14	Is the waste a pharmaceutical waste or resulting from the processing/treating of a pharmaceutical waste? Pharmaceutical wastes include wastes from veterinary pharmaceutical production. If no, proceed to Step 15. If the waste [or waste processed/treated generating the waste] meets a listing definition for a K, P, or U HW, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 15.			
15	Is the waste a plating bath waste or resulting from processing/treating of plating bath waste? If no, proceed to Step 16. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for F HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 16.			
16	Is the waste a sludge or resulting from processing/treating of a sludge? If no, proceed to Step 17. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for F or K HW. Must also determine if any of the waste being treated resulting in the generation of the sludge meets any of the listing definitions for F, P and/or U HW. If sludge meets a listing definition of a F or K HW or contains any waste meeting the listing definitions for F, K, P and/or U HW were processed generating the sludge, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 17.			
17	Does the waste contain any unreacted hazardous constituents listed in the F001 through F005 listings? If no, proceed to Step 18. Otherwise determine if that contaminant constituent came from a waste that meets any of the listing definitions for F HW. If the contaminant constituent is from a listed F HW (except for F003), draft a denial letter and proceed to Step 36. If the contaminant constituent is from a F003 and this waste does not exhibit the characteristic of ignitability, then this waste is not a listed F003 HW, but the waste must meet Land Disposal Restrictions of HW Rule 0400-12-01-.10. If this waste does not meet LDR of HW Rule 0400-12-01-.10, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 18.			
18	Is the waste a wood preserving waste or resulting from the processing/treating of wood preserving waste? If no, proceed to Step 19. Otherwise determine if the waste [or waste processed/treated generating the waste] meets the listing definition for a K001 HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 19.			
19	Is the waste an organic chemical production waste or resulting from the processing/treating of organic chemical production waste? If no, proceed to Step 20. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for K HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 20.			
20	Is the waste an inorganic chemical production waste or resulting from the processing/treating of inorganic chemical production waste? If no, proceed to Step 21. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for K HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 21.			
21	Is the waste from the production of explosives or resulting from the processing/treating of waste generated from the production of explosives? If no, proceed to Step 22. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for K HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 22.			
22	Is the waste a petroleum refinery waste or resulting from the processing/treating of petroleum refinery waste? If no, proceed to Step 23. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for K HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 23.			

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		YES	NO	HW
23	Is the waste an emission control dust/sludge from the primary production of steel in electric furnaces or spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC Codes 331 and 332) or resulting from the processing/treating of such waste. If no, proceed to Step 24. Otherwise determine if the waste [or waste processed/treated generating the waste] meets of the listing definition for a listed K061 or K062 HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceeds to Step 24.			
24	Is the waste a spent potliners from primary aluminum reduction or resulting from the processing/treating of such waste? If no, proceed to Step 25. Otherwise determine if the waste [or waste processed/treated generating the waste] meets the listing definition for K088 HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 25.			
25	Is the waste from secondary lead smelters or resulting from the processing/treating of waste from secondary lead smelters? If no, proceed to Step 26. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for K HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 26.			
26	Is the waste from ink formulation or resulting from processing/treating of ink formulation waste? If no, proceed to Step 27. Otherwise determine if the waste [or waste processed/treated generating the waste] meets the listing definition for a K086 HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 27.			
27	Is the waste from coking or resulting from the processing/treating of coking waste? If no, proceed to Step 28. Otherwise determine if the waste [or waste processed/treated generating the waste] meets any of the listing definitions for a K HW. If yes, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 28.			
28	Review the information provided on the application/recertification, Safety Data Sheets (SDS - formerly MSDS), and analytical data provided with the application/recertification. The characteristics of a HW found in Rule HW Rule 0400-12-01-.02(3) are addressed in Steps 28a through 28d. Proceed to Step 28a.	NA	NA	NA
28a	Does the waste exhibit the HW characteristic of ignitability [Rule 0400-12-01-.02(3)(b)]? If yes, the FOSWR drafts denial letter and proceeds to Step 36. Otherwise note all deficiencies proceed to Step 28b.			
28b	Does the waste exhibit the HW characteristic of Corrosivity [Rule 0400-12-01-.02(3)(c)]? If yes, the FOSWR drafts denial letter and proceeds to Step 36. Otherwise note all deficiencies proceed to Step 28c.			
28c	Does the waste exhibit the HW characteristic of Reactivity [Rule 0400-12-01-.02(3)(d)]? If yes, the FOSWR drafts denial letter and proceeds to Step 36. Otherwise proceed to Step 28d.			
28d	Does the waste exhibit the HW characteristic of Toxicity [Rule 0400-12-01-.02(3)(e)]? Please refer to Step 28d in the SOP for detailed information. If yes, the FOSWR drafts denial letter and proceeds to Step 36. Otherwise note all deficiencies proceed to Step 29.			
29	Is the waste a medical waste or contain a medical waste? If no, proceed to Step 30. Otherwise refer to DSWM Guidance Number 016 concerning Medical Waste and the rules and statutes cited therein to determine if the waste meets the specific conditions of the regulations to be managed as a special waste. If the medical waste does not meet the conditions of DSWM Guidance Number 016 and the rules and statutes cited therein, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 30.			
30	Is the waste a PCB waste or contain PCB waste? If no, proceed to Step 31. Please refer to DSWM Guidance Numbered 025, 111, and 113 concerning PCBs and EPA's October 24, 2012, memo addressing PCB Bulk Product Waste Reinterpretation specifying specific conditions that must be met before the waste may be managed as a special waste. If the PCB waste does not meet the conditions of DSWM and EPA Guidance, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 31.			
31	Is the waste a radiological/radioactive waste ? If no, proceed to Step 32. Otherwise, radiological wastes can be managed in accordance with DSWM Policy Number 126 concerning the MOA between the DRH and DSWM. Also, the DRH must approve the management of the Bulk Survey for Release wastes and Technologically-Enhanced Naturally Occurring Radioactive Materials at any DSWM permitted facility. The application/recertification must include a copy of the license (or appropriate portions) as required by DRH and issued by DRH authorizing the dispose of the specific radiological/radioactive waste containing radiological/radioactive material identified in Special Waste Application/Recertification in specific proposed disposal facility.; or reference the specific approval document. If the request is not in accordance with the DRH approval document, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 32.			

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STEP	Question	Mark with ✓		
		YES	NO	HW
32	Is the waste solvent-contaminated wipes as defined by as defined by HW Rule 0400-12-01-.01(2)(a)? If no, proceed to Step 33. Otherwise determine if the application/recertification describes how the solvent-contaminated wipes will be managed in a manner so the waste will be conditionally excluded under HW Rule 0400-12-01-.02(1)(d)2(xviii) by complying with those six conditions. If trichloroethylene is present or application/recertification does not describe how the solvent-contaminated wipes will be managed in a manner so the waste will be conditionally excluded under HW Rule 0400-12-01-.02(1)(d)2(xviii) by complying with those six conditions, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 33. Note that the any approval letter must list the six conditions of HW Rule 0400-12-01-.02(1)(d)2(xviii) that must be met for the waste to be managed and disposed of as a special waste.			
33	Has the waste been a HW prior to being treated so that it is no longer is a HW? If no, proceed to Step 34. Otherwise determine if the application/recertification includes documentation that the waste is no, longer a HW and meets the Land Disposal Restrictions of HW Rule 0400-12-01-.10. If the waste is a HW or does not meet the Land Disposal Restrictions of HW Rule 0400-12-01-.10, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 34.			
34	<ol style="list-style-type: none"> Determine if the waste is dangerous and/or difficult to manage because of potential risks it poses to facility personnel and perhaps others during unloading, processing, or disposal (e.g., friable asbestos wastes, large amounts of fine dust wastes, wastes that react with water to create toxic or asphyxiating gases, wastes that are delivered to the landfill at elevated temperatures, wastes that emit significant volatile organics at ambient conditions, etc.). Please refer to DSWM Guidance Numbered 043, 087, and 118 concerning asbestos. Determine if the waste is dangerous and/or difficult to manage because of problems during processing, disposal or after disposal (e.g., waste which are corrosive or otherwise unusually damaging to landfill equipment or materials, wastes which react with water to create heat and gases such as aluminum dross waste may be affected by moisture in cover material or other media). Determine if the waste is dangerous and/or difficult to manage because the amount or type of waste requires special operational considerations or conditions (e.g., wastes that are delivered to the landfill at harmful temperatures, requires deviation from normal operations, such as bulky waste, or requires specialized equipment that is not listed in the facility's permit. Refer to Step 34 in the SOP when it is necessary for the FOSWR to contact the COSWC for technical assistance from the CO for the review of special waste application/recertifications. <p>If the waste cannot be managed safely, the FOSWR drafts a denial letter and proceeds to Step 36. Otherwise note all deficiencies and proceed to Step 35.</p>			
35	If the waste meets Special Waste Categories [Cyanide wastes, Distillation bottom wastes, Pesticide wastes, Pharmaceutical wastes, Plating bath wastes, Sludge, or wastes that contain a unreacted F001-F005 constituent, Wood preserving wastes, Organic chemical production wastes, Inorganic chemical production wastes, Wastes from the production of explosives, Petroleum refinery wastes, Spent potliners from primary aluminum reduction, Wastes from secondary lead smelters, Wastes from coking or Solvent-contaminated wipes] as listed in DSWM's guidance SWM-SWP-G-135- Special Waste, then an on-site visit should be conducted. Exceptions may include sludge generated by POTW and Drinking Water Plants. If the generating facility has not had a HW inspection recently, the site visit should include a HW inspection if located in Tennessee. Proceed to Step 36.			
36	There are the four possible outcomes from the review of Special Waste Application/recertifications. Proceed to Step 36a, 36b, 36c or 36d as appropriate. PLEASE SEE PAGES 26 THROUGH 28 OF THE SOP FOR GREATER DETAILS.	NA	NA	NA
36a	Deficient Special Waste Application/Recertification- The FOSWR prepares and sends an email or letter to the applicant that identifies the specific deficiency(s) in the application/recertification and stating that the review cannot proceed until the additional information/data is provided.			
36b	Denial Letter - The FOSWR prepares the denial letter to the applicant that identifies specific reason(s) for the denial. The denial letter shall be signed by the FOSWR and EFOM.			
36c	Non-Special Waste Letter - The FOSWR prepares the Non-Special Waste Letter to the applicant with limitations/clarifications/conditions. The letter shall be signed by the FOSWR and EFOM.			
36d	Special Waste Approval Letter- The FOSWR prepares the approval letter to the applicant with limitations/clarifications/conditions. The letter shall be signed by the FOSWR and EFOM.			