




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

APR 02 2015

Memorandum

Subject: Waste Analysis at Facilities That Generate, Treat, Store, and Dispose of Hazardous Wastes: A Guidance Manual (Final)

From: Barnes Johnson, Director   
Office of Resource Conservation and Recovery

To: Regional RCRA Division Directors and Branch Chiefs

I am pleased to share with you the final *Waste Analysis at Facilities That Generate, Treat, Store, and Dispose of Hazardous Waste: A Guidance Manual*, which is attached to this email and is also posted on our website at: <http://www.epa.gov/epawaste/hazard/refdocs.htm#notice>.

The purpose of this guidance is to assist states, the Environmental Protection Agency (EPA), and the regulated community with the application of waste analysis and waste analysis plan requirements under the Resource Conservation and Recovery Act (RCRA). RCRA treatment, storage, and disposal facilities (TSDFs), will especially benefit from the guidance on how to develop, implement, and evaluate waste analysis plans.

The EPA first issued guidance for waste analysis and waste analysis plans in 1994 and, since then, has identified through implementation and enforcement experience several areas where improved guidance could enable more effective compliance with the regulatory requirements. This final guidance improves upon that initial 1994 guidance and is also a result of 40 comment submissions received during two rounds of public comment, including over 500 suggestions from operating TSDFs, regional and state permit writers, trade associations, and environmental groups. The public comments and our responses can be found on our website above.

Revisions in this current edition of the guidance include new recommendations, for example, the guidance suggests greater use of testing when handling wastes. The guidance also includes an expanded discussion on how to integrate Data Quality Objectives into sampling/analysis activities. New waste analysis plan examples have been added to give permit applicants and permit writers ideas to consider when preparing or approving a waste analysis plan. Additionally, the updated manual incorporates changes to the federal RCRA program, including regulations and guidance that have been issued since 1994.

I would like to personally thank our dedicated and hard-working workgroup, which included members from the states, EPA regions, and EPA's Office of Enforcement Compliance and Assurance, Office of Research and Development, Office of General Counsel, and the National Enforcement Investigations Center, for their contributions. Their expertise and thoughtful consideration of issues over the course of this five-year effort were central to the development of this guidance.

If you have any questions regarding this guidance, please contact Gail Hansen of my staff at 703-308-0463 ([hansen.gail@epa.gov](mailto:hansen.gail@epa.gov)).

cc: Dania Rodriguez, ASTSWMO