

Land Disposal Restriction Notice

a generator's land disposal restriction notice and waste minimization certification, set against the determination record behind them | Final specimen

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A prescribed certification retyped in the writer's own words, a two-sentence notice carrying only its first sentence, and a category statement the file contradicts.

FINAL TEXT

SPECIMEN, PREPARED BY EDITFAST FOR ILLUSTRATION. NOT A REAL FILING. Prepared for Ardmore Precision Works (fictitious), land disposal restriction notice and manifest certification

EXTRACT FROM THE GENERATOR'S RECORD (reproduced unchanged in both panels)

GR-1 The site is a large quantity generator for the month of this shipment, determined under 40 CFR 262.13.

GR-2 The environmental manager made the hazardous waste determination on June 3, the day the waste was generated. The file entry was typed on July 18.

GR-3 The determination rests on knowledge of the process rather than on testing.

GR-4 The process is solvent cleaning of machined parts. The spent solvent is recorded as F002, and the constituents relied on are listed in the process file.

GR-5 The site has not determined whether the waste meets the treatment standards, and asks the receiving facility to make that determination.

GR-6 A waste minimization program was approved by the plant manager in March and is held in the environmental file.

LAND DISPOSAL RESTRICTION NOTICE, accompanying manifest 001234567FLE

EPA Hazardous Waste Number: F002

Manifest number: 001234567FLE

This hazardous waste may or may not be subject to the LDR treatment standards. The treatment facility must make the determination.

CERTIFICATION

[Query to the environmental manager: GR-5 records that the site has not determined whether the waste meets the treatment standards. The certification at 40 CFR 268.7(a)(3) is for waste that does meet those standards at the point of generation, and the alternative notice above is what 268.7(a)(2) provides for the other case. Nothing has been certified here, and the paraphrase that stood in this space has been removed rather than corrected.]

WASTE MINIMIZATION CERTIFICATION, Item 15 of the manifest

I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

BASIS OF THE HAZARDOUS WASTE DETERMINATION

The waste is hazardous. The determination rests on knowledge of the process rather than on testing. The process is solvent cleaning of machined parts. The spent solvent is recorded as F002, and the constituents relied on are listed in the process file.

Determination made at the point of waste generation: June 3. File entry typed: July 18.

EXAMPLE
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