



PLAINTIFF'S EXHIBIT

ASA-1314

X WASTE MANAGEMENT OF THE SOUTHWEST
INDUSTRIAL SERVICES DIVISION
11180 Gateway East
El Paso, TX 79927

F A X C O V E R S H E E T

DATE: May 29, 1996 TIME: 5:20 PM
TO: Greg Parham Phone: 915-541-1829
FAX: 915-541-1888
FROM: Patricia Rodriguez PHONE: 915-858-2577
FAX: 915-858-9696
RE: Acceptance Criteria Information

Number of pages including cover sheet: 5

Message

Here is the "Acceptance Criteria" for the Butterfield Station Facility.

I'm looking into the handling conditions for this Catalyst Dust wastestream. I'm good to guess that this material, if non-haz, would have to be contained, somewhat like asbestos - double bagged.

I am also looking into the "Haz" and "Non-Haz" pricing for you.

The minute I have that information I will get the quote worked up for you.

Have a great day!



Waste Management of Arizona
Industrial Services Division
Customer Service Center
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CONDITIONS FOR MANAGING WASTE BUTTERFIELD STATION FACILITY

I. ACCEPTANCE CRITERIA

All items sent to Butterfield Station Landfill Facility must be non-hazardous as defined by 40 CFR Part 261 and RCRA (Resource Conservation Recovery Act.)

One representative sample must be analyzed for each 200 cubic yards of excavated petroleum contaminated soil by an Arizona State certified laboratory, and representative samples from the PCS must be obtained using sampling requirements set forth in Test Methods for Evaluation Solid Waste volume II: Field Manual, physical/Chemical Method, Chapter 9 (SW-846 Third Edition, 1986 Environmental Protection Agency, Washington, D.C. and future additions or amendments).

Disposal Method	Basic Requirements	
Direct Landfill	Unlimited TPH Must pass paint filter test	EPA Method 3095
Bio-Remediation	Unlimited TPH- No gasoline	Limited amount of debris*

* debris must be less than 4 inches in diameter

Note: Based on generator's knowledge some or all of the following required TCLP constituents may be eliminated from testing. Written explanation must be provided for any TCLP constituents not tested for based on generator's knowledge of how waste was generated. Under the various petroleum contaminated soils there are some TCLP parameters that may not be eliminated based on generator's knowledge. An asterisk denoted this requirement (i.e. gasoline and used oil).

Additional analytical testing may be required on a case by case basis depending on the process generating the waste, i.e. solvent screens, pesticides, and herbicides.

March 1996

Conditions for Managing Wastes
Butterfield Station Facility

II. SPECIFIC SOURCES

- a. **ASBESTOS**
No analytical requirements. See Special Conditions for Managing Asbestos
- b. **ANIMAL FATS / GREASE TRAPS / NON-STEAM CAR WASH**
No analytical requirements. A non-hazardous waste certificate must be signed at BSF.
- c. **SEPTIC (RESIDENTIAL, RV)**
No analytical requirements. A non-hazardous waste certificate must be signed at BSF.
- d. **WATER SEPARATORS / STEAM CAR WASHES / EQUIPMENT WASHES**
 - (1) TCLP for eight RCRA metals - EPA Method 1311
 - (2) Volatile Organic Compounds (VOC's) - EPA Method 8010
 - (3) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020
 - (4) Flash point must be greater than 140 degrees Fahrenheit - EPA Method 1010
- e. **MUNICIPAL SLUDGE / DOMESTIC SEWERS**
 - (1) TCLP for eight RCRA metals - EPA Method 1311
 - (2) Volatile Organic Compounds (VOC's) - EPA Method 8010
 - (3) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020
 - (4) Flash point must be greater than 140 degrees Fahrenheit - EPA Method 1010
- f. **WASTEWATER**
 - (1) TCLP for eight RCRA metals - EPA Method 1311
 - (2) Volatile Organic Compounds (VOC's) - EPA Method 8010
 - (3) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020
 - (4) Flash point must be greater than 140 degrees Fahrenheit - EPA Method 1010
 - (5) pH
- g. **USED:**
oil, transmission fluid, and other organic non-hazardous liquid waste streams
 - (1) TCLP for eight RCRA metals - EPA Method 1311
 - (2) Volatile Organic Compounds (VOC's) - EPA Method 8010
 - (3) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020
 - (4) Flash point must be greater than 140 degrees Fahrenheit - EPA Method 1010
- h. **OFF-SPEC:**
oil, transmission fluid, and other organic liquid waste streams
 - (1) Original Material Safety Data Sheet (MSDS) and generator certification

Conditions for Managing Wastes
Butterfield Station Facility

i. **SLUDGE FROM UST'S**

If the material is generated from a UST and fits the definition for liquid containing wastes, the representative samples must be analyzed to test requirements set forth for Petroleum Contaminated Soils at a minimum.

j. **SOLIDIFIED RESINS AND DEBRIS**

- (1) TCLP for eight RCRA metals - EPA Method 1311 (as necessary)
- (2) Paint filter - EPA Method 9095 (as necessary)
- (3) Original Material Safety Data Sheet (MSDS) if available

k. **PETROLEUM CONTAMINATED SOILS**

Petroleum contaminated soils (PCS) are those defined as: Excavated soils contaminated by the spillage or leakage of petroleum products or the clean up of such spills or leaks. Petroleum products shall be defined as gasoline, diesel fuel, motor oils, hydraulic fluids, jet fuel, and kerosene. Petroleum contaminate soils are accepted for disposal at Butterfield Station Facility (BSF), subject to the following conditions:

1. Diesel fuel, motor oil, etc. (excluding used oil)

- (1) Total Petroleum Hydrocarbons (TPH) - EPA Method 418.1
- (2) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020

2. Used oil and other TPH contaminants

- (1) Total Petroleum Hydrocarbons (TPH) - EPA Method 418.1
- (2) TCLP for eight RCRA metals - EPA Method 1311
- (3) Volatile Organic Compounds (VOC's) - EPA Method 8010
- (4) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020
- (5) in lieu of (#3) and (#4) - EPA Method 8240

3. Gasoline, jet fuel, and kerosene - direct landfill only

- (1) Total Petroleum Hydrocarbons (TPH) - EPA Method 418.1
- (2) TCLP for eight RCRA metals - EPA Method 1311
- (3) Benzene, Toluene, Ethyl Benzene, and Xylene (BTEX) - EPA Method 8020
- (4) Paint filter - EPA Method 9095

III. NON SPECIFIC SOURCES

This category is generally used to describe "industrial wastes." Specific analytical requirements will be developed based on the individual waste stream. The WM Industrial Services Division sales team as well as the BSF approvals chemist will work closely with you in developing the criteria to ensure the waste stream is acceptable for management at Butterfield Station Facility.

USEPA HAZARDOUS WASTE CODES	CONSTITUENT	REGULATORY LEVEL IN mg / L (ppm)
D001 D002 D003	IGNITABILITY CORROSIVITY REACTIVITY	> 140 degrees F (60 C) pH range 2.0 to 12.5 Sulfide < 250 Cyanide < 125 No reaction with H2O
METALS D004 D005 D006 D007 D008 D009 D010 D011	ARSENIC BARIUM CADMIUM CHROMIUM LEAD MERCURY SELENIUM SILVER	5.0 100.0 1.0 5.0 5.0 0.2 1.0 5.0
VOLATILE ORGANICS D018 D019 D021 D022 D028 D029 D035 D039 D040 D043	BENZENE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROFORM 1,2 - DICHLOROETHYLENE 1,1 - DICHLOROETHYLENE METHYL ETHYL KETONE (MEK) TETRACHLOROETHYLENE (PCE) TRICHLOROETHYLENE (TCE) VINYL CHLORIDE	0.5 0.5 100.0 6.0 0.5 0.7 200.0 0.7 0.5 0.2
SEMI VOLATILES D023 D024 D025 D026 D027 D030 D032 D033 D034 D036 D037 D038 D041 D042	o - CRESOL m - CRESOL p - CRESOL CRESOL (TOTAL) 1,4 - DICHLOROBENZENE 2,4 - DINITROTOULENE HEXACHLOROBENZENE HEXACHLOROBUTADIENE HEXACHLOROETHANE NITROBENZENE PENTACHLOROPHENOL PYRIDINE 2,4,5 - TRICHLOROPHENOL 2,4,6 - TRICHLOROPHENOL	200.0* 200.0* 200.0* 200.0* 7.5 0.13 0.13 0.5 3.0 2.0 100.0 5.0 400.0 2.0
PESTICIDES D012 D013 D014 D015 D020 D031 HERBICIDES D016 D017	ENDRIN LINDANE (gamma - BHC) METHOXYCHLOR TOXAPHENE CHLORDANE HEPTACHLOR 2,4 - D 2,4,5 - TP (Silvex)	0.02 0.4 10.0 0.5 0.03 0.008 10.0 1.0

* If the o-, m-, and p-cresol concentrations cannot be differentiated then the total cresol (d026) concentration (200ppm) is used. D001-D042 is maximum concentration by TCLP unless noted otherwise. If totals are below listed levels, TCLP is not required.