



Hazardous Waste Sampling & Interpreting Lab Results

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M-B1

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Question 1:

Where are you from?



Course Objectives

01. **WHAT** to Sample
02. **WHEN** to Sample
03. **WHICH** tests to request
04. **INTERPRETING** the Sample Results
05. **NOW WHAT?**



Question 2:

Why do we need to sample?



Waste Determination



01. Is it a **WASTE**?
02. Is it a **HAZARDOUS WASTE**?
03. Is it **LISTED** or **CHARACTERISTIC**?
04. Is it **EXEMPTED** or **EXCLUDED**?

*Who is responsible for making the Determination?
How can they make a Waste Determination?*

Hazardous Waste CHARACTERISTICS

Test Methods - SW-846

Toxic

RCRA: TCLP

Non-RCRA: TTLC, STLC,
Definitive Fish Bioassay, Oral,
Dermal, or Inhalation

Reactive

RCRA : Cyanides and Sulfides

D004-43



D001



Ignitable

Flashpoint <140°F

D002



Corrosive

pH ≤2 or ≥12.5

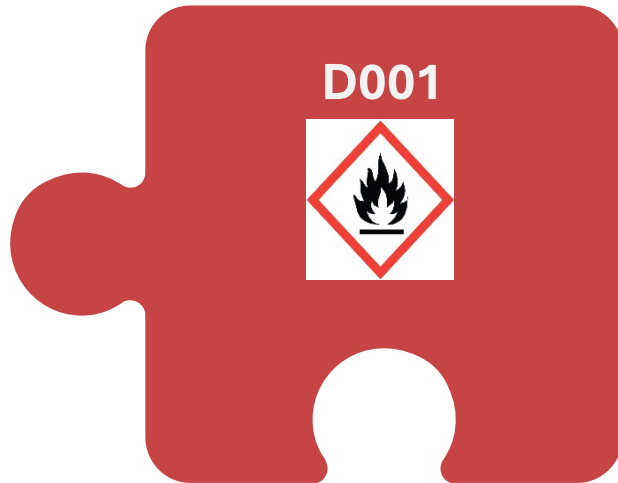
Liquids are RCRA

Solids are Non-RCRA (CA)

D003



IGNITABILITY



Ignitable: Liquid (other than <24% alcohol) with a Flashpoint <140°F

-or-

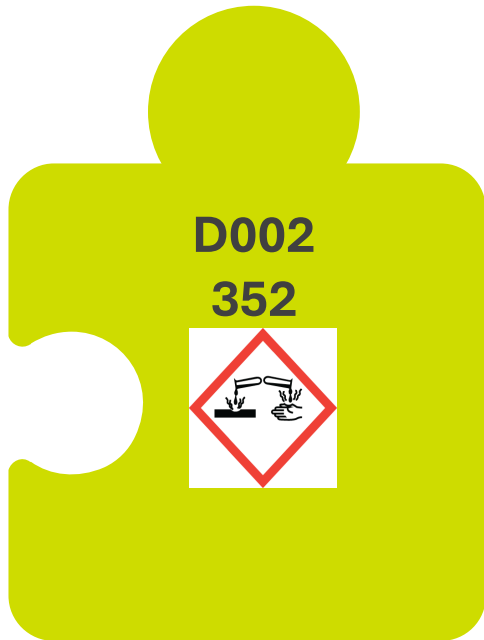
- A non-liquid under standard temperature and pressure (STP), is capable of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard. Non-liquids are more difficult to test.
- Ignitable compressed gas
- Oxidizer

California uses the same definition and test method as Federal

TEST METHOD: [1010A](#) (ASTM D93) -
Pensky-Martens Closed Cup Method



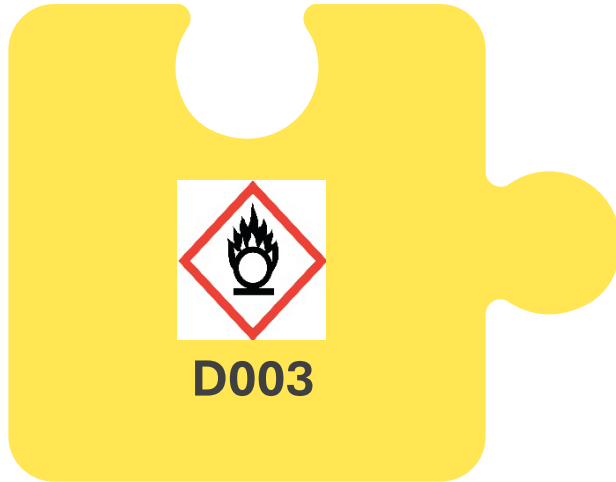
CORROSIVITY



Corrosive: pH ≤ 2 or ≥ 12.5

RCRA – D002	Non-RCRA (CA) - 352
LIQUID containing at least 20% water	SOLID containing less than 20% water
TEST METHOD: 9040C - pH Electrometric Measurement	TEST METHOD: 9045D - Soil and Waste pH (the solid is mixed 1:1 with water)

REACTIVITY



TEST METHODS:

[9010C](#) – Cyanides

[9030B](#) - Sulfides

Reactive: a solid waste with any of the following properties:

- (1) It is **normally unstable** and readily undergoes violent change without detonating.
- (2) It **reacts violently with water**.
- (3) It forms potentially **explosive mixtures** with water.
- (4) When mixed with water, it **generates toxic gases, vapors or fumes** in a quantity sufficient to present a danger to human health or the environment.
- (5) It is a **cyanide or sulfide bearing waste** which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
- (6) It is **capable of detonation or explosive reaction** if it is subjected to a *strong initiating source or if heated under confinement*.
- (7) It is readily capable of detonation or explosive decomposition or reaction at *standard temperature and pressure*.
- (8) It is a **forbidden explosive** as defined in 49 CFR 173.54, or is a Division 1.1, 1.2 or 1.3 explosive as defined in 49 CFR 173.50 and 173.53.

Question 3:

How many tests are there for toxicity?



TOXICITY



RCRA (D004-43)

TEST METHOD:

[1311](#) – *Toxicity Characteristic Leaching Procedure (TCLP)*

The TCLP is designed to determine the mobility of *both organic and inorganic* analytes present in liquid, solid, and multiphasic wastes.

Tests for 8 metals and 14 organic chemicals.

Non-RCRA (CA)

TEST METHODS for INORGANICS:

[6010B](#) - Inductively Coupled Plasma-Atomic Emission Spectrometry (aka CAM17)

[7470A/1B](#) – Mercury Cold-Vapor Technique

[300.1](#) - Fluoride Salts

TEST METHODS for ORGANICS:

[8260B](#) - Volatile Organic Compounds by GC/MS

[8270C](#) - Semivolatile Organic Compounds by GC/MS

[8082A](#) - Polychlorinated Biphenyls (PCBs) by GC

[8082B](#) - Dioxins and Dibenzofurans by GC/MS

[8015M](#) - Diesel, Gasoline, and Kerosene Range organics

Results from these test are used to determine if the sample exceeds:

Total Threshold Limit Concentration (TTL) or Soluble Threshold Limit Concentration (STLC)

RCRA: TCLP



- 8 metals (D004-011)
- 6 pesticides (D012-017)
- 26 organic chemicals (D018-043)

<i>Substance</i>	<i>20x rule</i>	<i>TCLP (mg/L)</i>
Arsenic (D004)	100	5
Barium [†] (D005)	2,000	100
Cadmium (D006)	20	1
Chromium VI (D007)	100	5
Lead (D008)	100	5
Mercury (D009)	4	0.2
Selenium (D010)	20	1
Silver (D011)	100	5
METHOD:	-	1311 / 6010B
Benzene (D018)	10	0.5
Carbon Tetrachloride (D019)	10	0.5
Chlorobenzene (D021)	2,000	100.0
Chloroform (D022)	120	6.0
1,4-Dichlorobenzene (D027)	150	7.5
1,2-Dichloroethane (D028)	10	0.5
1,1-Dichloroethene (D029)	14	0.7
Hexachlorobutadiene (D033)	10	0.5
Hexachloroethane (D034)	60	3.0
Nitrobenzene (D036)	40	2.0
Pyridine (D038)	100	5.0
Tetrachloroethylene (D039)	14	0.7
Trichloroethylene (D040)	10	0.5
Vinyl Chloride (D043)	4	0.2
METHOD:	-	1311 / 8260B

CA: TTLC / STLC



ORGANICS

	<i>2,040</i>	204	2,040
Trichloroethylene			
METHOD:	-	WET / 8260B	8260B
Aldrin	<i>1</i>	0.14	1.4
Chlordane	<i>3</i>	0.25	2.5
DDT, DDE, DDD	<i>1</i>	0.1	1
Dieldrin	<i>8</i>	0.8	8
Endrin	<i>0</i>	0.02	0.2
Heptachlor	<i>5</i>	0.47	4.7
Kepone	<i>21</i>	2.1	21
Methoxychlor	<i>100</i>	10	100
Mirex	<i>21</i>	2.1	21
Pentachlorophenol	<i>17</i>	1.7	17
Toxaphene	<i>5</i>	0.5	5
METHOD:	-	WET / 8270C	8270C
PCB	<i>50</i>	5	50
METHOD:	-	WET / 8082	8082
Dioxin	<i>0</i>	0.001	0.01
METHOD:	-	WET / 8280A	8280A

INORGANICS

<i>Substance</i>	<i>10x rule</i>	<i>STLC (mg/L)</i>	<i>TTLC (mg/Kg)</i>
Antimony	<i>150</i>	15	500
Arsenic	<i>50</i>	5	500
Barium [†]	<i>1,000</i>	100	10,000
Beryllium	<i>8</i>	0.75	75
Cadmium	<i>10</i>	1	100
Chromium VI	<i>50</i>	5	500
Chromium, total	<i>50</i>	5 (560) [‡]	2,500
Cobalt	<i>800</i>	80	8,000
Copper	<i>250</i>	25	2,500
Lead	<i>50</i>	5	1,000
Molybdenum ^{††}	<i>3,500</i>	350	3,500
Nickel	<i>200</i>	20	2,000
Selenium	<i>10</i>	1	100
Silver	<i>50</i>	5	500
Thallium	<i>70</i>	7	700
Vanadium	<i>240</i>	24	2,400
Zinc	<i>2,500</i>	250	5,000
METHOD:	-	WET / 6010B	6010B
Mercury	<i>2</i>	0.2	20
METHOD:	-	WET / 7470A/1B	7470A/1B
Fluoride salts	<i>1,800</i>	180	18,000
METHOD:	-	WET / 300.1	300.1

CA: TOXICITY



Non-RCRA (CA)

ADDITIONAL TEST METHODS:

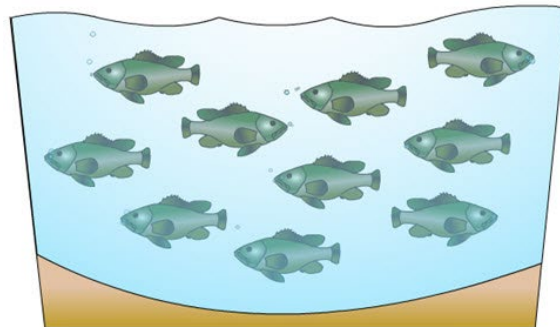
Acute Oral LD₅₀ (rat): <2,500 mg/kg

Acute Dermal LD₅₀ (rabbit): <4,300 mg/kg

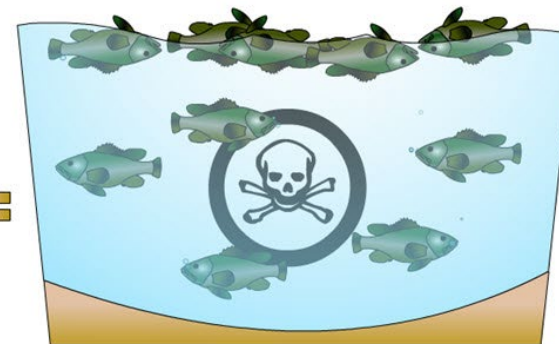
Acute Inhalation LC₅₀ (rat): <10,000 ppm

Acute Aquatic 96-hour LC₅₀: <500 mg/L

- *Oncorhynchus mykiss* (rainbow trout)
- *Pimephales promelas* (fathead minnow)
- *Notemigonus crysoleucas* (golden shiner)



LC₅₀ < 500 mg/l












Acute Aquatic Toxicity

“What questions might you ask?”



GHS Pictograms

<p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/Burns • Eye Damage • Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> • Oxidizers 	<p>Environment (Non Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

Need more details? Refer to the Safety Data Sheets

Safety Data Sheet
According to 29 CFR 1910.1200 and GHS No. 3

Effective date: 12.10.2011 Page 1 of 3

Section 1 - Identification of the substance/mixture and of the supplier

Product name: Roundup Pro Concentrate Herbicide, 4L
 Manufacturer/Supplier trade name: Roundup Pro Concentrate Herbicide, 4L
 Manufacturer/Supplier identification number: 000000
 Recommended uses of the product and main restrictions on use:
 Manufacturer details:
 Agribusiness Scientific
 P.O. Box 1000
 13000 Old Orchard Road, Suite 100
 13000 Old Orchard Road, Suite 100

Section 2 - Hazards identification

Classification of the substance or mixture:

Acute toxicity:
 Oral: LD50 (mice): 1000 mg/kg (category 2)
 Inhalation: LC50 (mice): 1000 mg/kg (category 2)

Health hazard:
 Skin: Irritation (category 2)
 Serious: Irritation (category 2)
 Serious: Irritation (category 2)

Section 3 - Composition/information on ingredients

Roundup Pro Concentrate Herbicide, 4L
 Roundup Pro Concentrate Herbicide, 4L
 Roundup Pro Concentrate Herbicide, 4L

SAFETY DATA SHEET

ROUNDUP PRO CONCENTRATE HERBICIDE

Product name: ROUNDUP PRO CONCENTRATE HERBICIDE
 Product code: 000000
 Product code (SKU): 000000
 Product code (SKU): 000000
 Product code (SKU): 000000

Section 1 - IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/SUPPLIER

Product name: ROUNDUP PRO CONCENTRATE HERBICIDE
 Product code: 000000
 Product code (SKU): 000000
 Product code (SKU): 000000
 Product code (SKU): 000000

Section 2 - HAZARDS IDENTIFICATION

Classification of the substance or mixture:
 Acute toxicity: Oral: LD50 (mice): 1000 mg/kg (category 2)
 Inhalation: LC50 (mice): 1000 mg/kg (category 2)
 Skin: Irritation (category 2)
 Serious: Irritation (category 2)
 Serious: Irritation (category 2)

SAFETY DATA SHEET

Section 1 - Identification

Product name: ROUNDUP PRO CONCENTRATE HERBICIDE
 Product code: 000000
 Product code (SKU): 000000
 Product code (SKU): 000000
 Product code (SKU): 000000

Section 2 - Hazards identification

Classification of the substance or mixture:
 Acute toxicity: Oral: LD50 (mice): 1000 mg/kg (category 2)
 Inhalation: LC50 (mice): 1000 mg/kg (category 2)
 Skin: Irritation (category 2)
 Serious: Irritation (category 2)
 Serious: Irritation (category 2)

Fixative - SDS

(2012 OSHA Hazard Communication Standard (29 CFR 1910.1200))

SAFETY DATA SHEET

Diff Quik® Set

SDS #: duhm0008

Section 1. Identification

Product identifier : Diff Quik® Set
Product code : 130832, B4132-1A, 10445586, 10450382
Product type : Liquid.

Relevant identified uses of the substance or mixture and uses advised against
 Not applicable.

Manufacturer : Medion Grifols Diagnostics AG
 Bonnstrasse 9
 CH-3188 Dürdingen
 Switzerland
 Tel.: (+41) 28 492 8702
 Fax: (+41) 28 492 8656

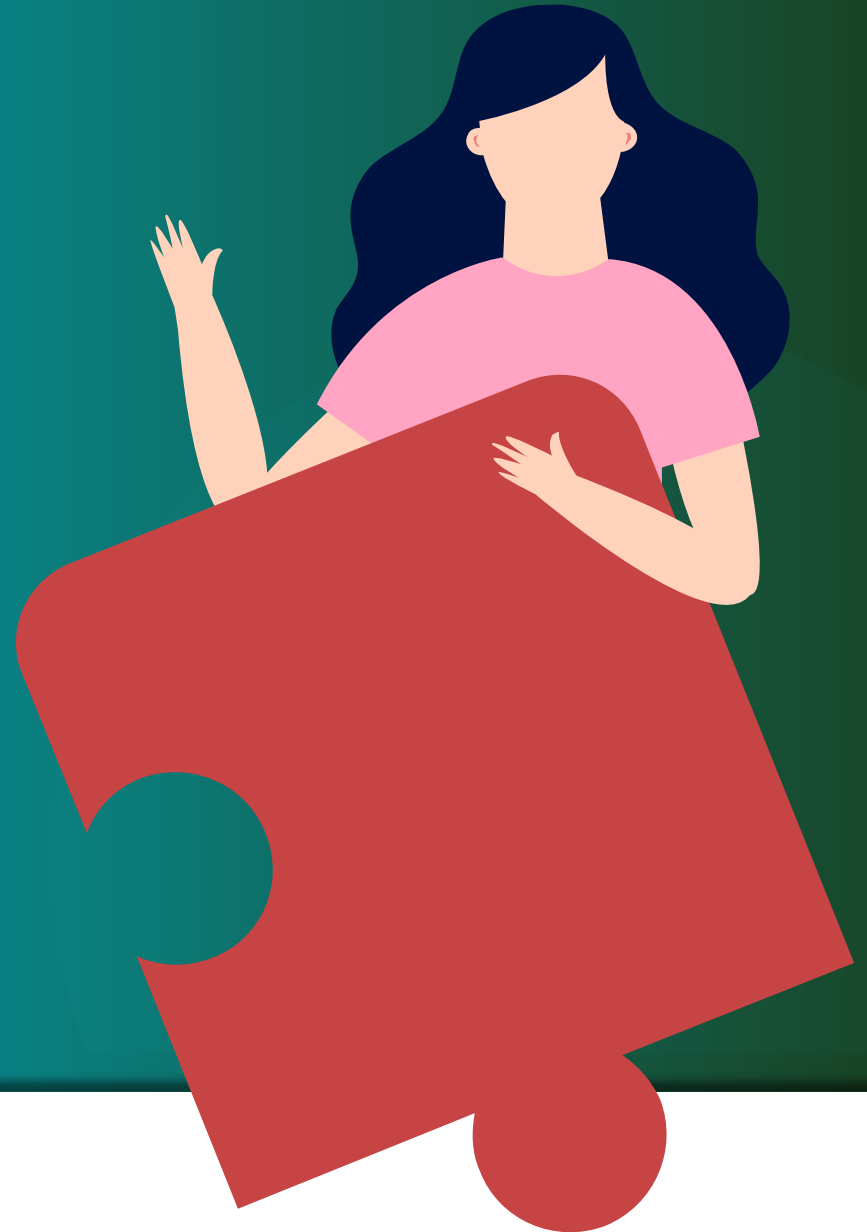
Supplier : Siemens Healthcare Diagnostics Inc.
 511 Benedict Avenue
 Tarrytown, NY 10591-5097 USA
 1-877-229-3711
 (800) 424-9300 (CHEMTREC) (24/365)

Section 2. Hazards identification

OSHA/HCS status	: Diff Quik Fixative Solution	This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200). While this material is not considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200), this SDS contains valuable information critical to the safe handling and proper use of the product. This SDS should be retained and available for employees and other users of this product.
	Diff-Quik Solution I	
	Diff-Quik Solution II	While this material is not considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200), this SDS contains valuable information critical to the safe handling and proper use of the product. This SDS should be retained and available for employees and other users of this product.
Classification of the substance or mixture	: Diff Quik Fixative Solution	FLAMMABLE LIQUIDS - Category 2 ACUTE TOXICITY (inhalation) - Category 3 SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) - Category 1 Not classified. Not classified.
	Diff-Quik Solution I Diff-Quik Solution II	
Additional information	: Not available. Not available.	

GHS label elements

Date of issue/Date of revision : 5/12/2017 **Date of previous issue** : 1/22/2016 **Version** : 1.05 1/10



Eosin Y - SDS

ThermoFisher
SCIENTIFIC

SAFETY DATA SHEET

Creation Date 26-Sep-2009

Revision Date 24-Dec-2021

Revision Number 5

1. Identification

Product Name Eosin Y, Alcoholic 0.25% Solution
Cat No. : SE22-500D
Synonyms Eosin yellow solution, alcoholic
Recommended Use Laboratory chemicals.
Uses advised against Food, drug, pesticide or biocidal product use.

Details of the supplier of the safety data sheet

Company

Fisher Scientific Company
One Reagent Lane
Fair Lawn, NJ 07410
Tel: (201) 798-7100

Emergency Telephone Number CHEMTREC®, Inside the USA: 800-424-9300
CHEMTREC®, Outside the USA: 001-703-527-3887

2. Hazard(s) identification

Classification

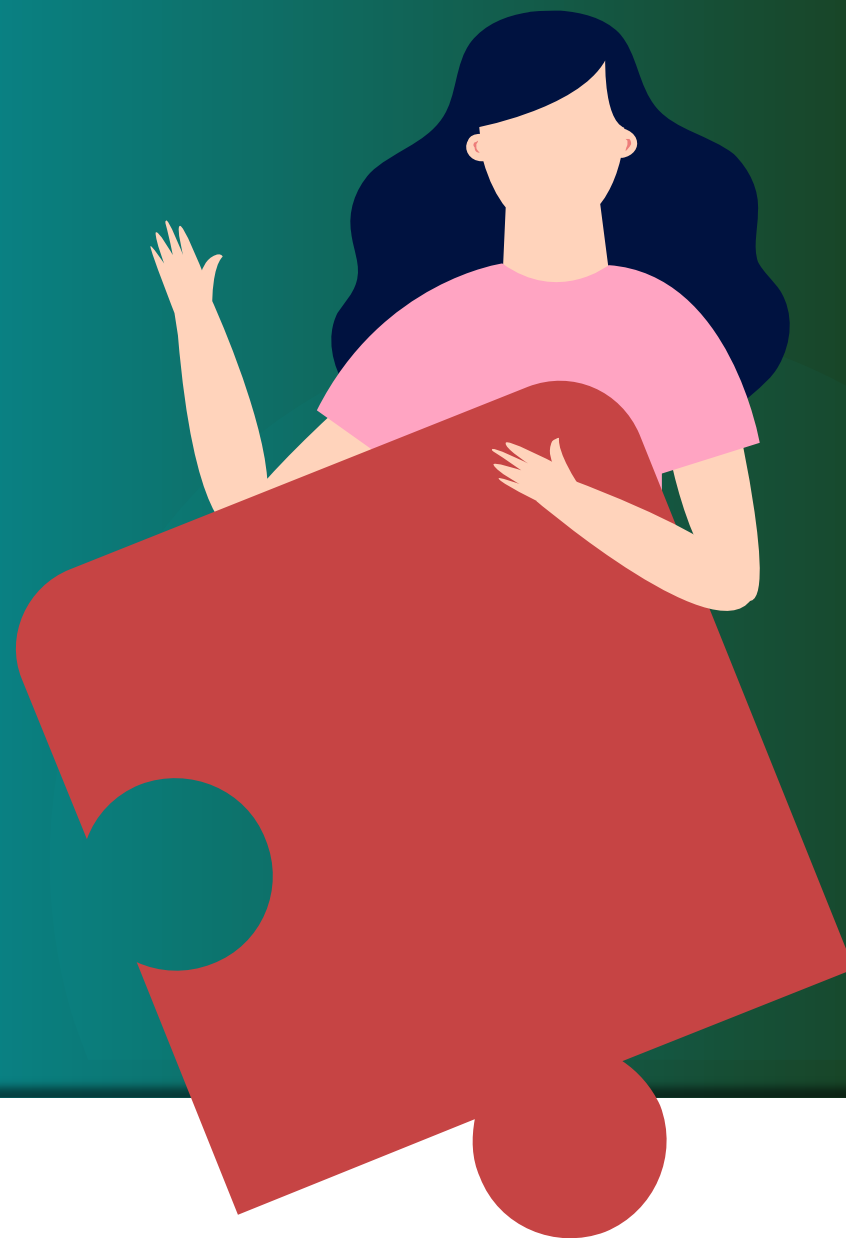
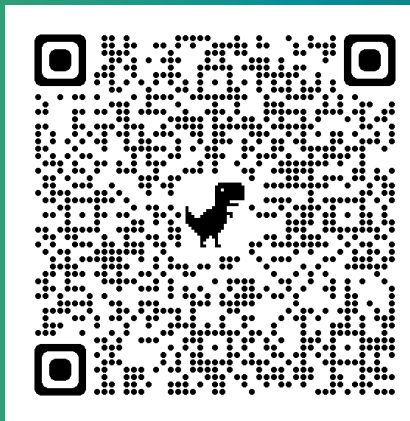
This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Flammable liquids	Category 2
Serious Eye Damage/Eye Irritation	Category 2
Specific target organ toxicity (single exposure)	Category 2
Target Organs - Optic nerve, Central nervous system (CNS).	Category 2

Label Elements

Signal Word
Danger

Hazard Statements
Highly flammable liquid and vapor
Causes serious eye irritation
May cause damage to organs



Thiazin - SDS



Hematology Reagent B: Thiazin Stain Safety Data Sheet

according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

SECTION 1: Identification

1.1. Identification

Product form : Mixture
Product name : Hematology Reagent B: Thiazin Stain
Product code : SS-071B, SS-071B-EU, or SS-171B2 diluted with methanol

1.2. Relevant identified uses of the substance or mixture and uses advised against
Use of the substance/mixture : Hematology Pro staining reagent

1.3. Details of the supplier of the safety data sheet

ELITechGroup Inc.
370 West 1700 South
Logan, UT 84321 - USA
T +1 (435) 752-6011 - F +1 (435) 752-4127
qars_ebs@elittechgroup.com - www.elittechgroup.com

1.4. Emergency telephone number

Emergency number : Contact your distributor or poison control center in your country.
InfoTrac Emergency Response: Calls within the USA, phone: 1-800-533-3053. Calls outside the USA, phone: +1 332-323-3500 (call collect)
Customer ID: #90104 (NOTE: this number is required when a customer calls into either phone number above).

SECTION 2: Hazard(s) identification

2.1. Classification of the substance or mixture

GHS US classification

Flam. Liq. 3 H226 - Flammable liquid and vapor
Acute Tox. 3 (Oral) H301 - Toxic if swallowed
Acute Tox. 3 (Dermal) H311 - Toxic in contact with skin
Repr. 1B H360 - May damage fertility or the unborn child
STOT SE 1 H370 - Causes damage to organs (liver, kidneys, central nervous system, optic nerve) (oral, Dermal)

Full text of H- and EUH-statements: see section 16

2.2. Label elements

GHS US labeling

Hazard pictograms (GHS US) :



Signal word (GHS US) :

Danger

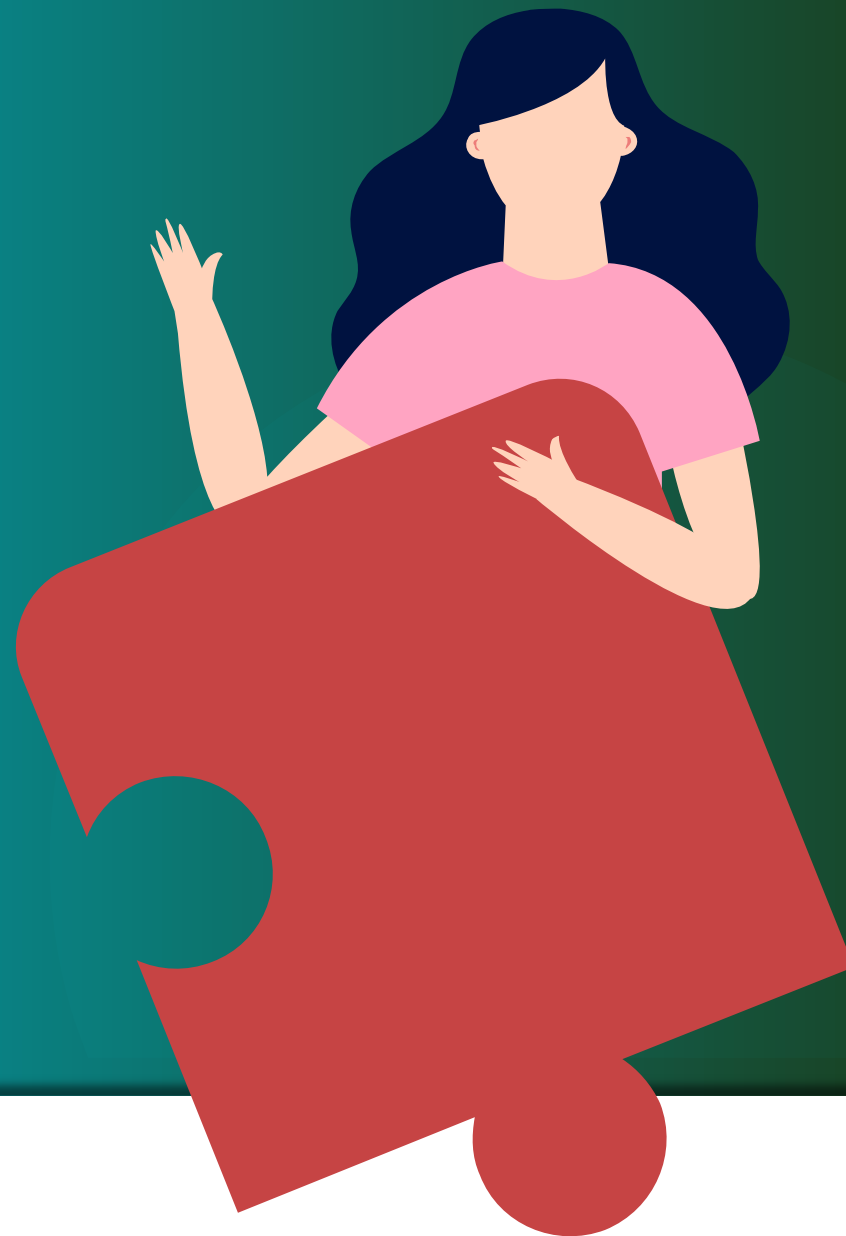
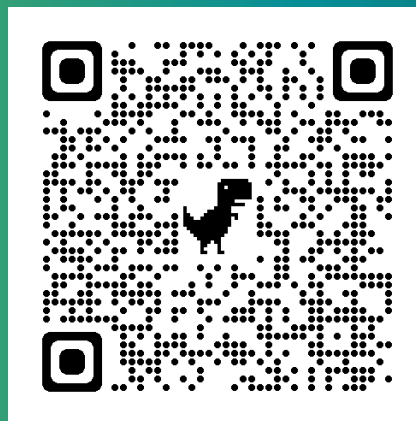
Hazard statements (GHS US) :

H226 - Flammable liquid and vapor
H301+H311 - Toxic if swallowed or in contact with skin
H360 - May damage fertility or the unborn child
H370 - Causes damage to organs (liver, kidneys, central nervous system, optic nerve) (oral, Dermal)
P210 - Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
P233 - Keep container tightly closed.
P243 - Take precautionary measures against static discharge.
P260 - Do not breathe mist, spray, vapors.
P264 - Wash hands thoroughly after handling this product.
P270 - Do not eat, drink or smoke when using this product.
P271 - Use only outdoors or in a well-ventilated area.
P280 - Wear protective gloves, protective clothing, eye protection, face protection.
P302+P352 - If on skin: Wash with plenty of soap and water.
P303+P361+P353 - If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.
P304+P340 - If inhaled: Remove person to fresh air and keep comfortable for breathing.

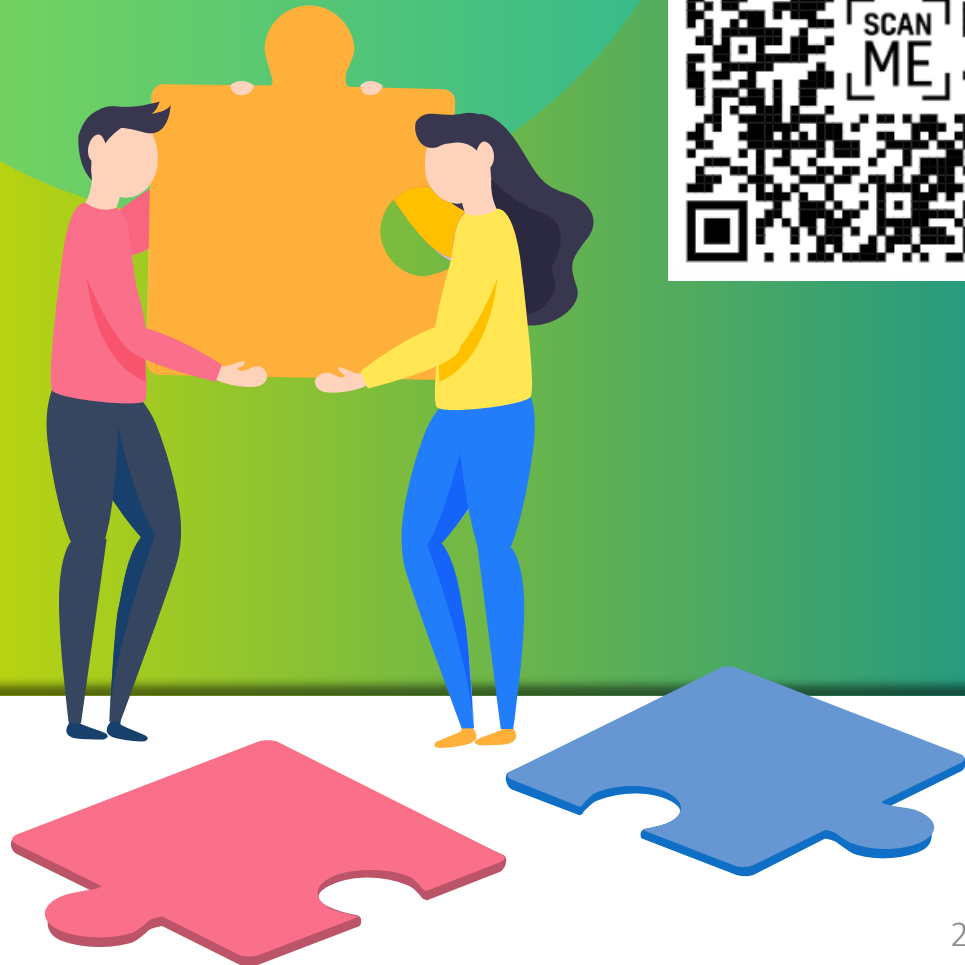
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Release Date: 2021-09-30

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US-EN

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Reference Guide



California Waste Criteria (non-RCRA)			
Corrosivity - solids (1:1 with water)	≤ 2 or ≥ 12.5		
METHOD:	9045D		
Substance	10x rule	STLC (mg/L)	TTL (mg/Kg)
Antimony	150	15	500
Arsenic	50	5	500
Barium ¹	1,000	100	10,000
Beryllium	8	0.75	75
Cadmium	10	1	100
Chromium VI	50	5	500
Chromium, total	50	5 (560) ²	2,500
Cobalt	800	80	8,000
Copper	250	25	2,500
Lead	50	5	1,000
Molybdenum ³	3,500	350	3,500
Nickel	200	20	2,000
Selenium	10	1	100
Silver	50	5	500
Thallium	70	7	700
Vanadium	240	24	2,400
Zinc	2,500	250	5,000
METHOD:	-	WET / 6010B	6010B
Mercury	2	0.2	20
METHOD:	-	WET / 7470A/1B	7470A/1B
Trichloroethylene	2,040	204	2,040
METHOD:	-	WET / 8260B	8260B
Aldrin	1	0.14	1.4
Chlordane	3	0.25	2.5
DDT, DDE, DDD	1	0.1	1
Dieldrin	8	0.8	8
Endrin	0	0.02	0.2
Heptachlor	5	0.47	4.7
Kepone	21	2.1	21
Methoxychlor	100	10	100
Mirex	21	2.1	21
Pentachlorophenol	17	1.7	17
Toxaphene	5	0.5	5
METHOD:	-	WET / 8270C	8270C
PCB	50	5	50
METHOD:	-	WET / 8082	8082
Dioxin	0	0.001	0.01
METHOD:	-	WET / 8280A	8280A
Fluoride salts	1,800	180	18,000
METHOD:	-	WET / 300.1	300.1
Asbestos ⁴	≥ 1%		
Acute Oral LD ₅₀	< 2,500 mg/Kg		
Acute Dermal LD ₅₀	< 4,300 mg/Kg		
Acute Inhalation LD ₅₀	< 10,000 ppm		
Acute Aquatic 96-hour LC ₅₀	< 500 mg/L		
Used Oil	Any spent amount (if according to HSC 25250.4)		
METHOD:	801SM - Oil Range		
For further guidance regarding choosing the correct method, see SW-846 Chapter 2.			

Federal Waste Criteria (RCRA)		
Ignitability - liquids* (D001)	< 60°C (140°F)	
METHOD:	1010A (ASTM D 93)	
Corrosivity - liquids (D002)	≤ 2 or ≥ 12.5	
METHOD:	9040C or 9045D	
Reactivity (D003)	cyanides	sulfides
METHOD:	9010C ⁵	9030B ⁶
Substance	20x rule	TCLP (mg/L)
Arsenic (D004)	100	5
Barium ¹ (D005)	2,000	100
Cadmium (D006)	100	5
Chromium VI (D007)	100	5
Lead (D008)	100	5
Mercury (D009)	4	0.2
Selenium (D010)	20	1
Silver (D011)	100	5
METHOD:	-	1311 / 6010B
Benzene (D018)	10	0.5
Carbon Tetrachloride (D019)	10	0.5
Chlorobenzene (D021)	2,000	100
Chloroform (D022)	120	6.0
1,4-Dichlorobenzene (D027)	150	7.5
1,2-Dichloroethane (D028)	10	0.5
1,1-Dichloroethane (D029)	14	0.7
Hexachlorobutadiene (D033)	10	0.5
Hexachloroethane (D034)	60	3.0
Nitrobenzene (D036)	40	2.0
Pyridine (D038)	100	5.0
Tetrachloroethylene (D039)	14	0.7
Trichloroethylene (D040)	10	0.5
Vinyl Chloride (D043)	4	0.2
METHOD:	-	1311 / 8260B
F Listed Hazardous Wastes (spent, non-specific source)		
Acetone (F003), Benzene (F005), n-Butanol (F003), Carbon Disulfide (F005), Carbon Tetrachloride (F005), Chlorobenzene (F001), Diethyl Ether (F003), 1,2-Dichlorobenzene (F002), Ethyl Acetate (F003), Ethylbenzene (F003), Isobutanol (F005), Methanol (F003), Methyl Ethyl Ketone (F003), Methyl Isobutyl Ketone (F003), Methylene Chloride (F001), Nitrobenzene (F004), 2-Nitropropane (F005), Pyridine (F005), Tetrachloroethylene (F001), Toluene (F005), 1,1,1-Trichloroethane (F001, F002), 1,1,2-Trichloroethane (F002), Trichloroethylene (F001), Trichlorofluoromethane (F002), Xylene (F003)		
METHOD:	8260B	
NOTES:		
(1) Laboratory methods (excluding WET & fluorides) according to USEPA SW-846 protocols. Wastewater methods are not recommended except for fluoride salts and fish bioassay.		
(2) For asbestos and elemental metals, the specified concentration limits apply only if the substances are in a friable, powdered or finely divided state.		
(3) Do not compare lists based solely on units. Ensure methods are correct. Note: mg/L equals mg/Kg for water only.		
* Other than an aqueous solution containing less than 24 percent alcohol by volume.		
⁵ Cyanide/sulfide methods do not measure reactivity.		
⁶ Excludes barium sulfide.		
⁷ Excludes molybdenum disulfide.		
⁸ Soluble chromium salts.		
⁹ Asbestos includes chrysotile, amosite, crocidolite, tremolite, anthophyllite and actinolite.		

EH 1/24/2014

Which tests would you request?



“Where are you going to collect your sample?”



“
For both Generators and
Regulators, the POINT OF
GENERATION is a very
important location when
sampling



Types of Sampling



PROBABILITY

Random sampling can be simple (singular), systematic (multiple), or stratified (multi-phase)



GRAB

A singular sample collected at a discrete location and time



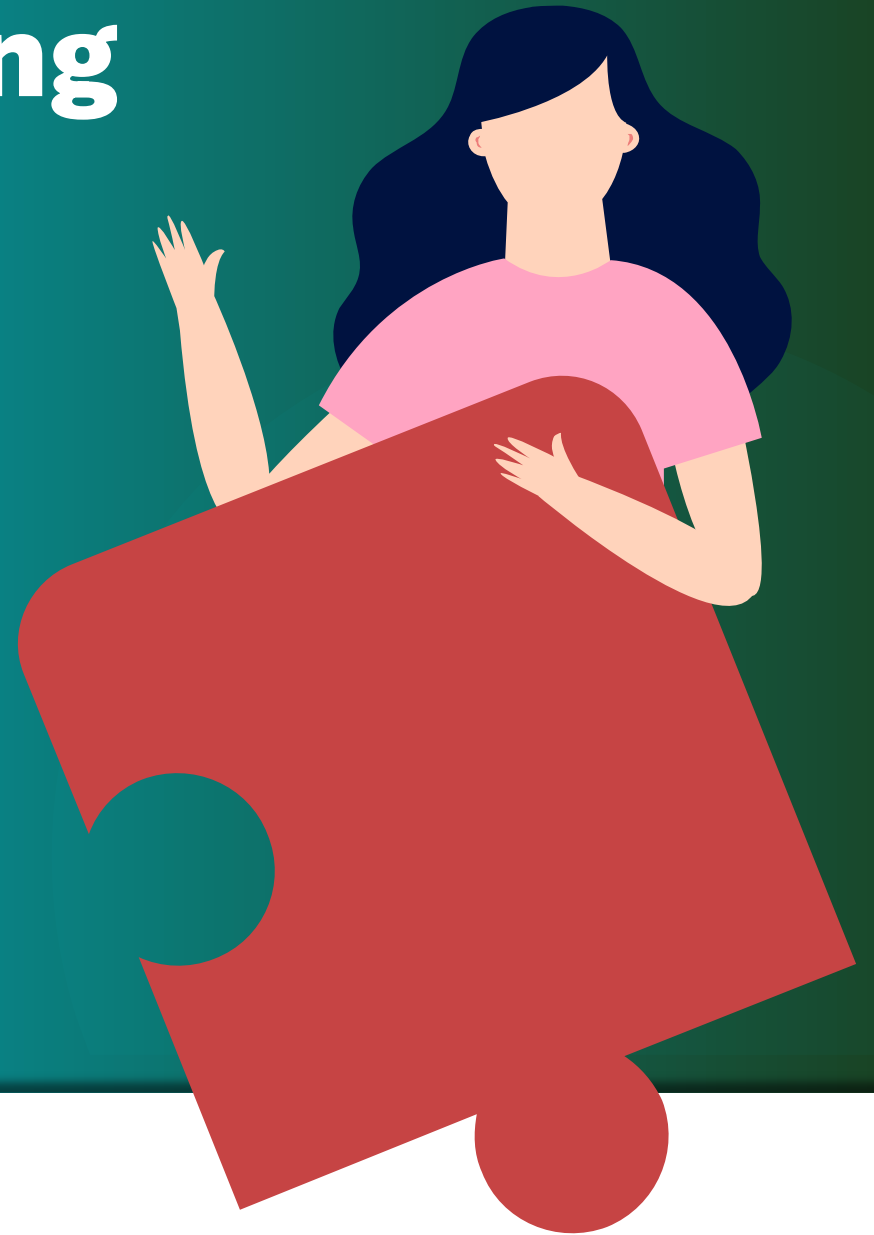
COMPOSITE

Combines multiple individual samples into one “composite” sample for testing

Representative Sampling

Generators are required to conduct waste determinations that draw accurate conclusions about their waste as a whole.

Representative data comes from a sample that can be expected to exhibit the average properties of the entire waste. Statistical analysis of data shows whether the samples taken are truly representative of the waste in total.



Authoritative Sampling

Regulators are not required to conduct representative sampling.

The regulator can collect a grab sample from the point of generation when and where they suspect the sample to be most hazardous.



Question 4:

If the process equipment has 3 different solutions that drain from 3 pipes into one waste container, how many samples would you take?



BEFORE SAMPLING...

Safety 1st

Remember, you are sampling something that is potentially hazardous.

Make a Plan

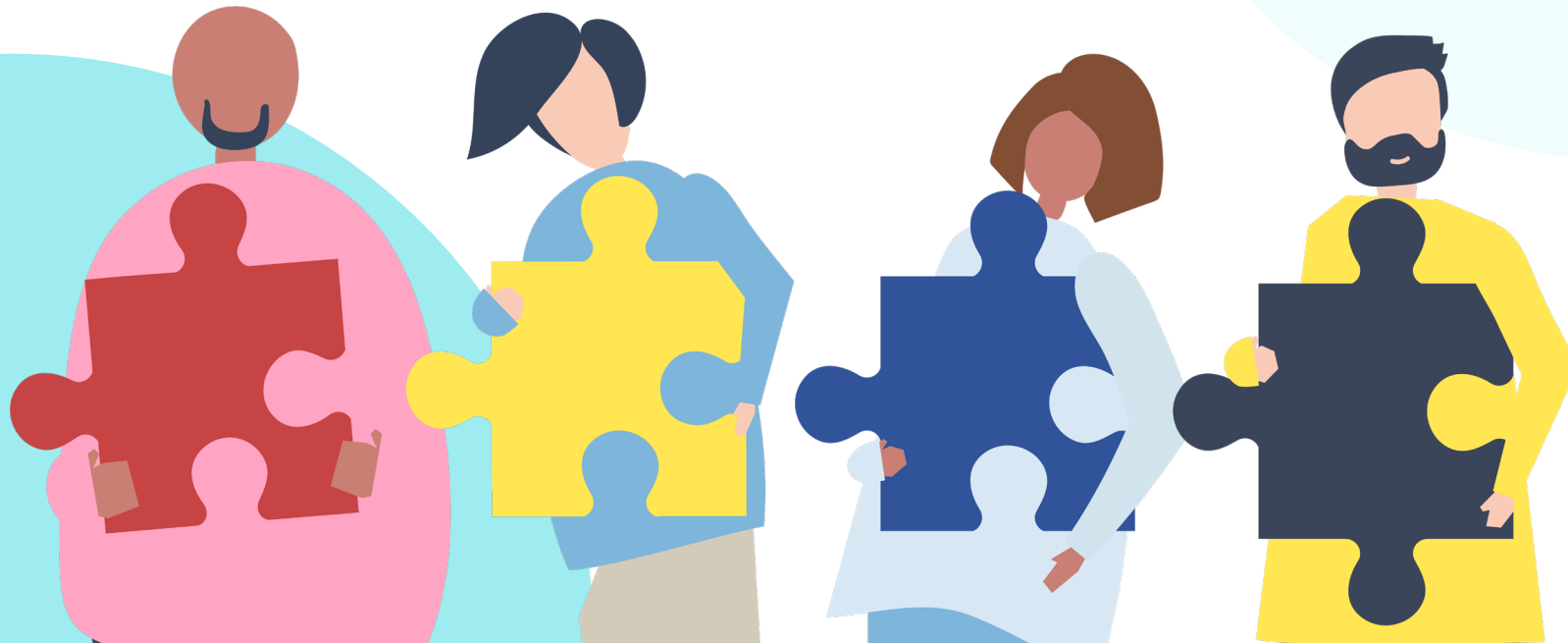
Be prepared. Plan carefully to avoid mistakes. You won't want to sample twice.

Documentation

Stay organized when sampling and document the details.

Communicate

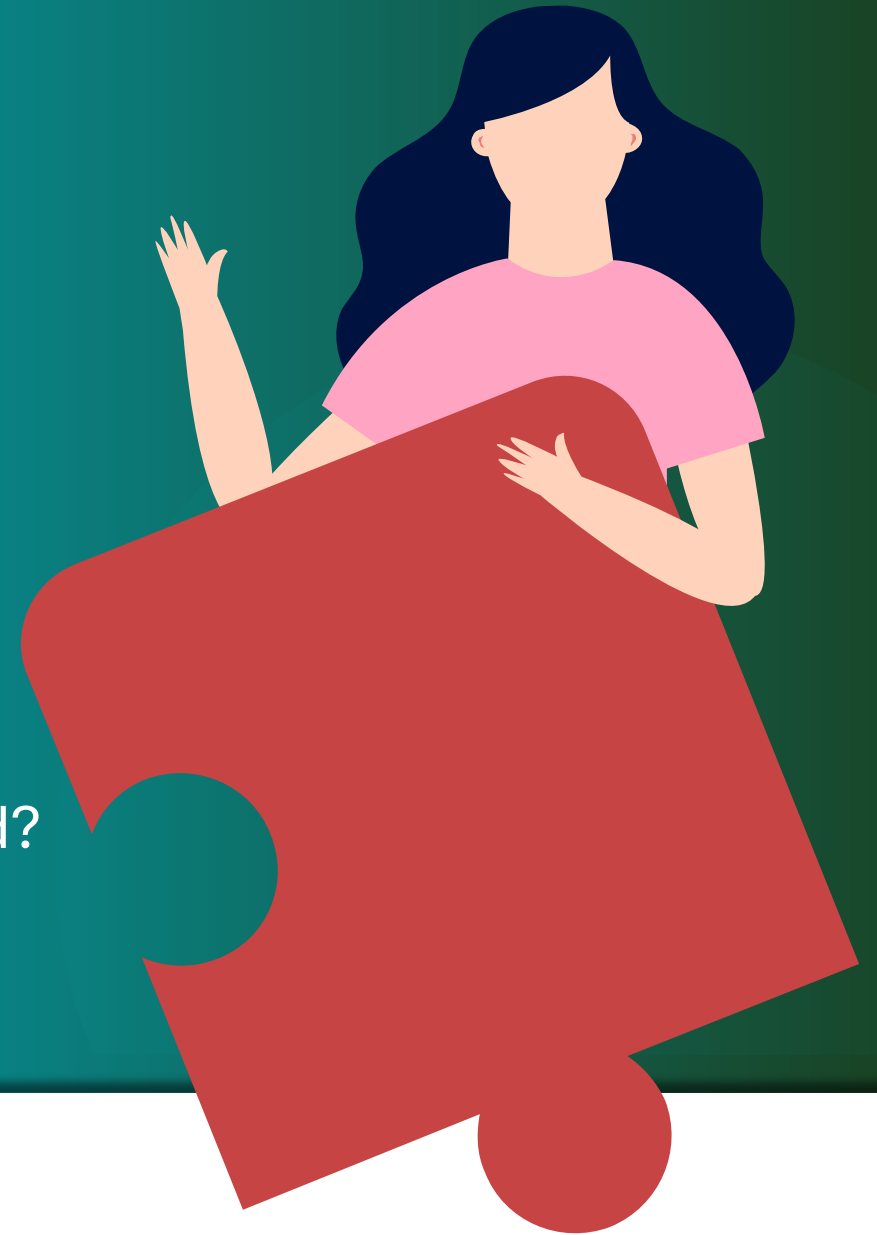
Communicate with everyone ahead of time. Set roles and responsibilities.



Safety First

Unless it is time critical, it's best to stop and get a plan together before sampling. **In ANY case, safety should always be your #1 consideration.**

1. What are the **Hazards**?
 - Releases
 - Toxic Vapors, Fumes or Dust
 - Traffic
 - Confined Space
2. What **Personal Protective Equipment** do you need?
3. What are your **Contingency Plans**?



Make a Plan



1. What are you sampling?
2. How many samples are you going to collect?
3. Do you have the right equipment?
4. Which tests are you going to run?
5. Are there any special handling requirements for any of the samples?
6. Will you have any help?
 - ✓ Dirty sampler
 - ✓ Clean sampler
 - ✓ Scribe
7. Who will analyze the samples?

Documentation

If it isn't documented, did it happen? Depending on *why* you are sampling, documentation serves different purposes.

- **Generators:** Written documentation demonstrates a proper and complete waste determination was made.
- **Regulators:** Documentation demonstrates what was sampled and chain of custody was maintained.

Documentation Includes: Photographs; Videos; Chain of Custody, Written Plans, Procedures, Statements, or Reports; etc.






Communication

Even the best laid plans can hit snags. Make sure to communicate with your team and everyone involved so everyone can be prepared and successful

1. Communicate with the **lab** before and after sampling:
 - **BEFORE:** Let them know what you are sampling. Ask if there are any special handling considerations.
 - **AFTER:** Receipt of samples and results of lab analysis
2. Communicate with **your team** before and after sampling:
 - **BEFORE:** Roles and responsibilities
 - **AFTER:** Lessons learned

“ 3 samples x 2 tests: Flashpoint and Aquatic Tox



Project/UPFP# Address			ANALYSIS REQUESTED				SAMPLE TYPE			COPY OF LAB RESULTS MUST BE SENT TO: Dept. of Environmental Health Hazardous Materials Division P.O. Box 129261 San Diego, CA 92112-9261		
Sampler's Signature Sampler's Printed Name: <u>Arleen Garfield</u>			Title 22 Metals (TTLC)	Title 22 Metals (STLC)	pH	Flashpoint/Ignitability	Other: <u>Aqueous Tox</u>	SOLID	LIQUID	MULTI-PHASIC	NO OF CONTAINERS	COMMENTS
SAMPLE LABEL NO.	DATE	TIME	DESCRIPTION OF SAMPLE/CONTAINER/LOCATION									
(of Collection)												
11328	10/17/19	12:26 PM	#1 - Fixative									
11329	10/17/19	12:35	#2 - Eosin									
11330	10/17/19	12:40	#3 - Thiazine									
11331	10/17/19	12:29	#1 - Fixative									
11326	10/17/19	12:34	#2 - Eosin									
15338	10/17/19	12:39	#3 - Thiazine									
HMD LAB CUSTODIAN (PRINT NAME): <u>Ron Isip</u>			DATE IN: <u>10-17-19</u>	TIME IN: <u>3:30 PM</u>	HMD LAB CUSTODIAN (PRINT NAME):			DATE IN:	TIME IN:	HMD LAB CUSTODIAN (PRINT NAME):		
HMD LAB CUSTODIAN (PRINT NAME): <u>Ron Isip</u>			DATE OUT: <u>10-21-19</u>	TIME OUT: <u>10:35 AM</u>	HMD LAB CUSTODIAN (PRINT NAME):			DATE OUT:	TIME OUT:	HMD LAB CUSTODIAN (PRINT NAME):		
① RELINQUISHED BY Signature: <u>Arleen Garfield</u> Printed Name: <u>Arleen Garfield</u> Company: <u>COSD-HMD</u> Time: <u>3:28 PM</u>		Date: <u>10-17-19</u>	② RELINQUISHED BY Signature: <u>Ron Isip</u> Printed Name: <u>COSD-HMD</u> Company: <u>COSD-HMD</u> Time: <u>10:37 AM</u>		Date: <u>10-21-19</u>	③ RELINQUISHED BY Signature: _____ Printed Name: _____ Company: _____ Time: _____		Date: _____	Sample Conditions Received On Ice Yes/No Tape Seal Intact Yes/No Special Shipment/Handling or Storage Requirements:			
RECEIVED BY Signature: <u>Ron Isip</u> Printed Name: <u>COSD-HMD</u> Company: _____ Time: <u>3:30 PM</u>		Date: <u>10-17-19</u>	RECEIVED BY Signature: <u>FRANCISCO</u> Printed Name: <u>FRANCISCO</u> Company: <u>TRU</u> Time: <u>10:40</u>		Date: <u>10-21-19</u>	RECEIVED BY Signature: _____ Printed Name: _____ Company: _____ Time: _____		Date: _____	Split Sample Provided To: <u>Declined per</u> 			

CONGRATULATIONS!
You've collected your sample and sent it to the lab. The lab has completed your requested tests and sent you the analytical report....



FATHEAD MINNOW HAZARDOUS WASTE
DEFINITIVE BIOASSAY



Lab No.: A-19082113-001
Client/ID: TestAmerica 440-248291-2

TEST SUMMARY

Species: *Pimephales promelas*.
Regulations: CCR Title 22.
Fish weight (gm): av: 0.38; min: 0.30; max: 0.44.
Test chamber volume: 10 liters.
Temperature: 20 +/- 2°C.
Aeration: Single bubble through narrow bore tube if DO <5.5 mg/L.
Number of replicates: 2.
Dilution water: Soft reconstituted water (40-48 mg/l CaCO₃).
Extraction method: mechanical shaking.

Source: Thomas Fish.
Ref. Tox. No.: RT-190823.
Test Protocol: California F&G/DHS 1988.
Endpoints: LC50 at 96 hrs.
Test type: Static.
Feeding: None.
Number of fish per chamber: 10.
Photoperiod: 16/8 hrs light/dark.

TEST DATA

Date/Time:	INITIAL				24 Hr				48 Hr				72 Hr				96 Hr			
	°C	DO	pH	# D	°C	DO	pH	# D	°C	DO	pH	# D	°C	DO	pH	# D	°C	DO	pH	# D
8-23-19 1030	20.2	8.1	7.7	0	20.1	7.5	7.6	0	20.3	5.9	7.8	0	20.4	6.0	7.6	0	20.2	7.4	7.7	0
8-24-19 1030	20.1	8.3	7.8	0	20.2	7.3	7.6	0	20.4	6.3	7.7	0	20.3	5.4	7.5	0	20.2	7.1	7.6	0
8-25-19 1030	20.2	8.3	7.8	0	20.2	7.2	7.5	0	20.3	6.7	7.7	0	20.4	5.6	7.6	0	20.3	7.0	7.5	0
8-26-19 1045	20.1	8.3	7.8	0	20.2	7.4	7.5	0	20.3	7.1	7.6	0	20.3	5.3	7.5	0	20.2	7.1	7.7	0
8-27-19 1030	20.2	8.2	7.8	0	20.2	7.5	7.5	0	20.2	6.2	7.7	0	20.4	5.8	7.5	0	20.2	7.1	7.6	0
	20.1	8.1	7.8	0	20.2	7.4	7.5	0	20.3	6.1	7.7	0	20.3	5.6	7.6	0	20.3	7.0	7.7	0
	20.1	8.3	7.8	0	20.2	7.5	7.5	0	20.2	6.2	7.7	0	20.4	5.8	7.5	0	20.2	7.1	7.6	0
	20.1	8.1	7.8	0	20.2	7.4	7.5	0	20.2	6.3	7.6	0	20.3	5.4	7.5	0	20.2	7.0	7.6	0
	20.1	8.3	7.8	0	20.3	7.4	7.5	0	20.2	6.1	7.5	0	20.3	5.3	7.5	0	20.1	7.1	7.6	0
	20.1	8.3	7.8	0	20.4	7.7	7.7	3	20.3	6.2	7.7	1	20.2	5.5	7.5	1	20.2	7.2	7.6	1
	20.2	8.4	7.8	0	20.3	7.4	7.1	4	20.2	6.3	7.6	1	20.4	5.3	7.5	1	20.3	7.0	7.6	2
	20.1	8.2	7.8	0	20.1	7.4	7.5	10	-	-	-	-	-	-	-	-	-	-	-	-
	20.2	8.1	7.8	0	20.1	7.4	7.5	10	-	-	-	-	-	-	-	-	-	-	-	-

Comments: Dissolved Oxygen (DO) readings in mg/l O₂

Test Aeration: None NA

* Aerated (Minimum needed to maintain DO > 5.5 mg/L through narrow-bore glass tube at < 100 bubbles per minute)

Client Sample Results

Client: County of San Diego

Job ID: 440-252859-1

Client Sample ID: 11331

Lab Sample ID: 440-252859-4

Date Collected: 10/17/19 12:29

Matrix: Waste

Date Received: 10/21/19 12:50

General Chemistry Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Flashpoint	<74.7			Degrees F			10/21/19 16:19	1

Client Sample ID: 11326

Lab Sample ID: 440-252859-5

Date Collected: 10/17/19 12:34

Matrix: Waste

Date Received: 10/21/19 12:50

General Chemistry Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Flashpoint	157.1			Degrees F			10/21/19 16:19	1

Client Sample ID: 15538

Lab Sample ID: 440-252859-6

Date Collected: 10/17/19 12:39

Matrix: Waste

Date Received: 10/21/19 12:50

General Chemistry Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Flashpoint	>201			Degrees F			10/21/19 16:19	1

ANALYTICAL REPORT
Eurofins TestAmerica, Irvine
17461 Delian Ave
Suite 100
Irvine, CA 92614-5817
Tel: (949)951-1022
Laboratory Job ID: 440-XXXXXX-1
Client Project/Site: CONFIDENTIAL

For:
County of San Diego
5600 Overland Ave, Suite 110
PO BOX 12061
San Diego, California 92112
Attn: Kelly Robertson

Kelly Robertson
Authorized for release by:
10/30/2019 11:40:59 AM
Shari Fama, Project Manager 1
(949)260-3274
shari.fama@testamericainc.com

Links
Review your project results through TotalAccess
Have a Question? Ask The Expert
Visit us at: www.testamericainc.com

The test results in this report meet all 2003 ASAC and 2009 TAP requirements for accredited laboratories, excepting the items in this report. This report may not be reproduced or copied in any way without written approval from the laboratory. For questions please contact the Project Manager at the email address or telephone number listed on this page.
This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.
Results relate only to the items tested and the samples as received by the laboratory.

AMERICAN ENVIRONMENTAL TESTING LABORATORY, LLC
 2040 NORTH HWY 94, SUITE 200, SAN DIEGO, CA 92108 • TEL: 619-444-1234 • FAX: 619-444-1235
 Telephone: (888) 289-4111 • (858) 643-6200 • www.aetlso.com

January 23, 2024

AETL 99-00 XXXXXX
 Revised Date: 01/17/2024
 Project Number: CONFIDENTIAL

County of San Diego
 5300 Linderoth Ave.
 San Diego, CA 92121
 Telephone: (619) 778-2167
 Attention: Kelly Robertson

Project Name: CONFIDENTIAL
 Site: XXXXXXXXXXXXX

Enclosed please find the results of analyses for samples which were analyzed as specified on the attached chain of custody. If you have any questions concerning this report, please do not hesitate to call.

Checked By: *Halley Coleman*
 Halley Coleman
 Project Manager

Approved By: *Dajj Khargava*
 Dajj Khargava
 Laboratory Director

Page 1 of 17

County of San Diego HMD Chain-of-Custody Record **BFA0121** Date 1/16/24 Page 1 of 1

Project/UPFP# Address			ANALYSIS REQUESTED					SAMPLE TYPE			COPY OF LAB RESULTS MUST BE SENT TO: Dept. of Environmental Health Hazardous Materials Division P.O. Box 129261 San Diego, CA 92112-9261
			Title 22 Metals (TLC)	Title 22 Metals (STLC)	pH	Flashpoint/Ignitibility	Other: <i>Fish Bioassay</i>	SOLID	LIQUID	MULTI-PHASIC	
Sampler's Signature <i>[Signature]</i> Sampler's Printed Name <u>SKY MURPHY</u>			COMMENTS								
SAMPLE LABEL NO.	DATE (of Collection)	TIME	DESCRIPTION OF SAMPLE/ CONTAINER/LOCATION								
<i>18259</i> BFA0121-01	<i>1/16/24</i>	<i>11:39 AM</i>	<i>Wright's Dip Stat # Solution from the bottle</i>								
<i>18117</i> BFA0121-02	<i>1/16/24</i>	<i>11:50 AM</i>	<i>Spent Carbolime granules</i>								

Positive Hits Summary

Lab ID	Client ID				Sampled
BFA0121-01	18250				01/16/2024 11:39
Method	Analyte	Result	Qualifier	Unit	Analyzed
EPA 1010	Flashpoint	76.0		Deg F	01/22/2024 10:30

Lab ID	Client ID				Sampled
BFA0121-02	18117				01/16/2024 11:50
Method	Analyte	Result	Qualifier	Unit	Analyzed
EPA 9045C	pH	13.0	HT-pH	pH unit	01/18/2024 12:45
EPA 9045C	Temperature	20.4		°C	01/18/2024 12:45

Result Summary:

Sample ID.	Results
BFA0121-02	≥40% dead in 750 mg/l

Question 5:

Which violations apply?



Quality Assurance (QA)

- Legally Defensible Data
- Adherence to methods and/or regulations
- Technically Defensible Data
- Support by controls & QC samples
- Consistent known quality



Quality Control (QC)

QC processes and activities focus on elimination or minimization of items such as:

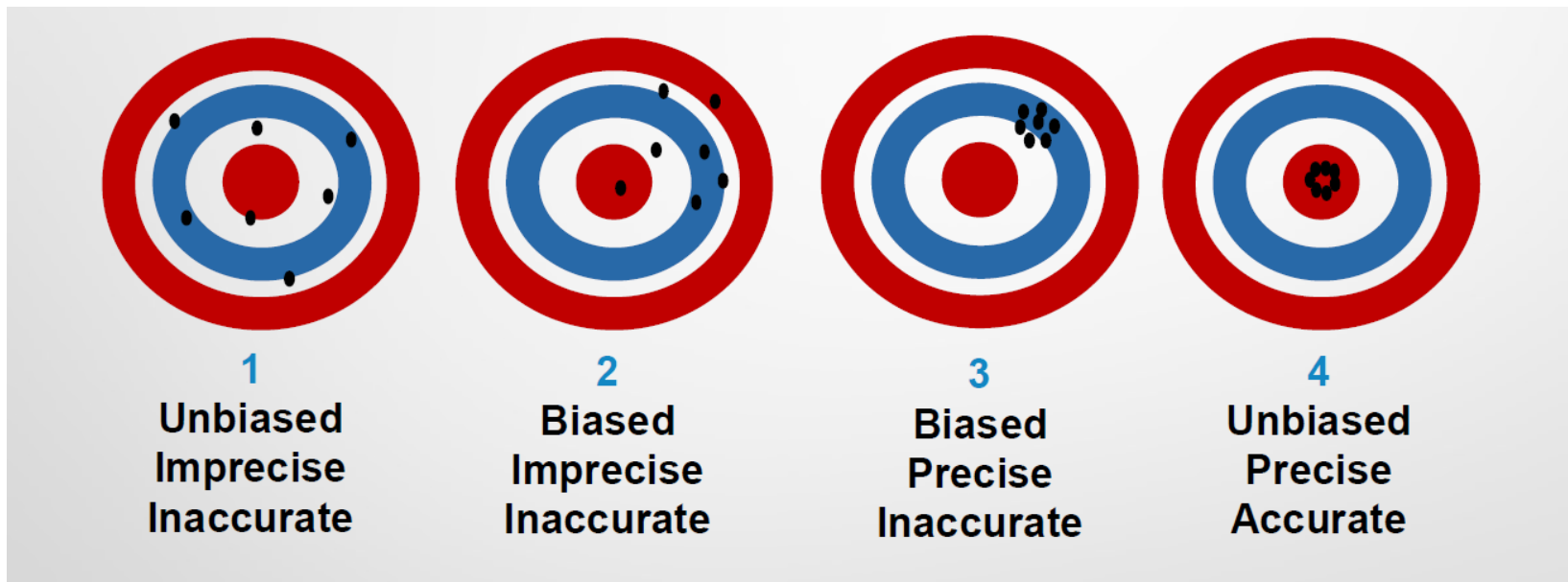
- False Positives
- False Negatives
- Mis-quantitations



Data Quality

Sample results are only as good as the quality of the data

Data quality are supported by quality control samples that evaluate bias, precision, and accuracy



Why Data Quality Matters

Qualifiers

GC/MS VOA

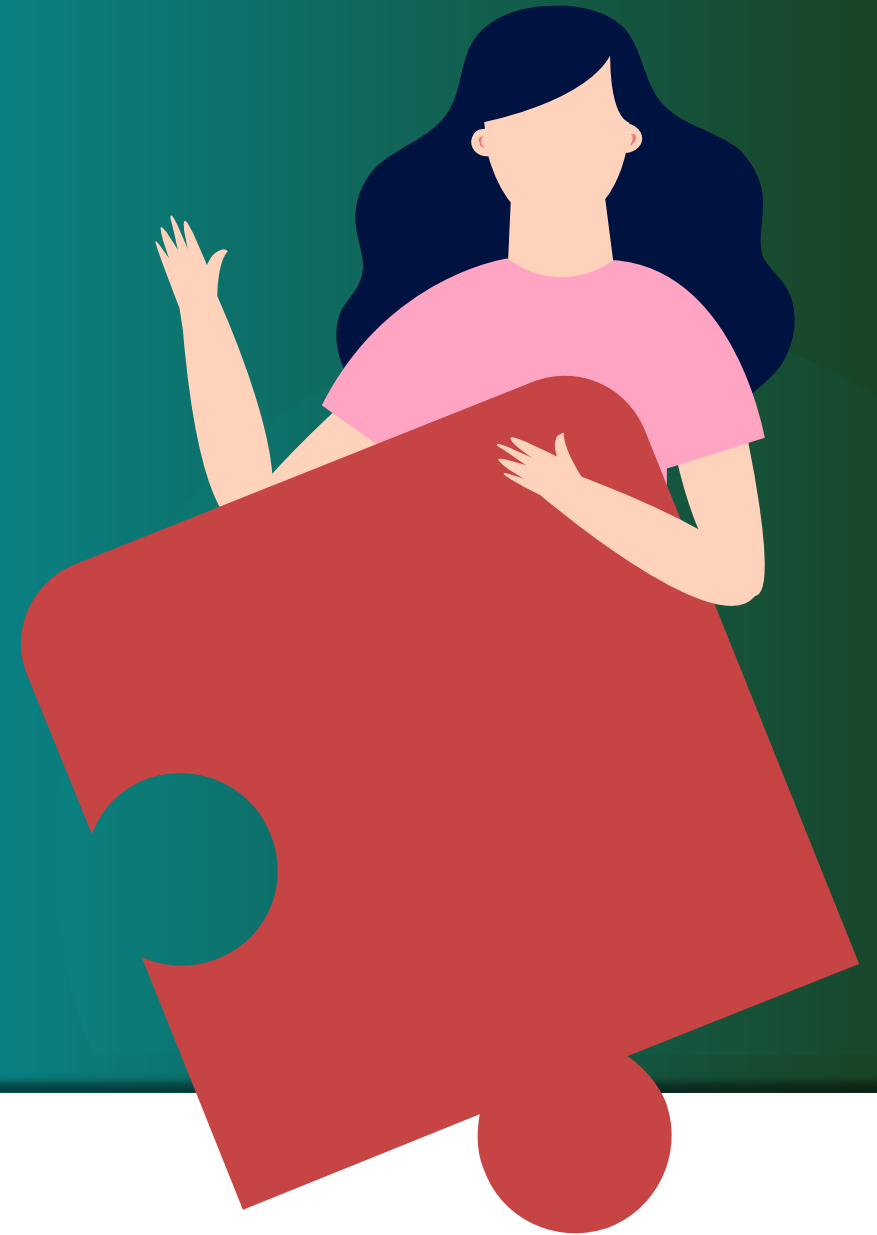
Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Metals

Qualifier	Qualifier Description
B	Compound was found in the blank and sample.
F1	MS and/or MSD recovery exceeds control limits.
F2	MS/MSD RPD exceeds control limits
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Common Report Flags

- “U” or “ND”: compound not detected
- “J”: estimated value
- “B”: compound detected in blank
- “S, L, M”: Spike Recovery Issue
- “R”: RPD recovery issue
- “H” Hold time exceeded
- “D”: Dilution performed




Key Points

- Check the SDS for clues
- Safety First
- Point of Generation is very important
- QA/QC matters



QUESTIONS?

An illustration featuring two stylized human figures. On the left, a person in a blue long-sleeved shirt and tan pants is pushing a large blue puzzle piece towards the center. On the right, a person in a yellow long-sleeved shirt and dark blue pants is pushing a large red puzzle piece towards the center. The puzzle pieces are interlocking, and the central blue piece contains the text 'Join me for Part 2 @ 1pm'. The background is a gradient of green and teal, with a large red silhouette of a person on the right side.

Join me
for Part 2
@ 1pm



Thank You for Attending

Arleen Gurfield, MPH, REHS
Supervising Environmental Health Specialist
San Diego County CUPA
Email: arleen.gurfield@sdcounty.ca.gov
Phone: 858-229-1135

26th California Unified Program
Annual Training Conference
February 26-29, 2024

