



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

FORM U
REQUEST TO PROCESS OR DISPOSE OF RESIDUAL WASTE
INSTRUCTIONS

GENERAL INFORMATION

To Obtain DEP Application Packages. To expedite the processing of the applicant's request, the Department of Environmental Protection (DEP) asks that you use the most up-to-date application package available. The most recent version of this package can be obtained by contacting the appropriate DEP office, or through our web site noted below. This package, as well as other Department-wide and/or program-specific permit application form packages are available in Microsoft Word format at this same web location. Applicants can download the appropriate form to a personal computer, complete the form electronically, and print the document for submittal to the Department.

<http://www.dep.state.pa.us> (directLINK "Permits")

General Instructions. This package is designed to assist an *existing client with DEP* in completing the application form. Clients that do not currently exist with DEP should complete a Form R, Waste Analyses & Classification Plan. Please type or print clearly when completing the form. If information needed is more than space allows, attach additional sheets as necessary. If a question is not applicable to you or your application, write NA in the appropriate box.

A full application for this application package will consist of completion of this Form U application and submittal of all attachments noted in the application. Caution: Information from the generator certifying that a hazardous waste determination has been done and that the waste is not hazardous waste as defined in 40 CFR 261, as incorporated by reference at 25 Pa. Code 261a.1 must be attached to the submitted application for it to be considered complete.

Date Prepared/Revised. Provide the date the application was prepared and/or revised. When additional sheets are attached to include additional information, identify each attached sheet as Form U, reference the item number and identify the date prepared/revised.

DEFINITIONS

To provide the applicant with a better understanding of terminology, we are including the following definitions.

eFACTS (Environment, Facility, Application, Compliance Tracking System). The Department of Environmental Protection's electronic application system to document and maintain client, site and facility data for purposes of authorizing regulated activities and tracking compliance.

eNotice. DEP has developed a comprehensive environmental compliance information reporting system to give the public access to permitting and compliance information on individual facilities by program and by geographic area. This system is available by logging on to the DEP web site and selecting eNOTICE.

Client (Responsible Party). A client (also referred to as Applicant) is a person or organization that requests approval from DEP to perform a regulated activity. Client information is documented and assigned an internal DEP Client ID# for tracking purposes.

For this particular application, there are two associated clients. One is the landfill owner and another is the generator of the waste.

Site (Place). A site is a physical location of importance to DEP. A site may include locations where a regulated facility is physically located or where a regulated activity occurs that has the potential to impact the health and safety of the citizens and/or the natural resources of the Commonwealth. A site is not solely defined by geographical location (can span several municipalities and even counties in some cases) but rather by the client/applicant's purpose of doing business. All DEP programs involvement at a physical location of importance to DEP is grouped under one 'entity' – site. This holistic view of site will promote an understanding of the interrelationships of facilities to support pollution prevention; multi-media inspections; a Department-wide view of compliance; and public understanding and access of information. Site information is documented and assigned an internal DEP Site ID# for tracking purposes.

For this particular application, the site is the landfill.

Site-to-Client Relationships. DEP will create internal records to relate (link) each site with all clients associated with the site and/or its facilities.

Authorization. Any DEP approval. For example: permits, plans, approvals, licenses, registrations, certifications, etc. Authorization information is documented and assigned an internal DEP Auth ID# for tracking purposes.

SECTION A.

LANDFILL CLIENT (LANDFILL OR PROCESSING FACILITY OWNER) INFORMATION

DEP Client ID#. A Department-wide unique identification number is assigned by DEP to the client after client information is entered into DEP's computer system (eFACTS). This one number identifies the client regardless of the program with which the client is working. This identification number will be identified on future correspondence from DEP as well as on client information available on our DEP web site. When interacting with DEP, inclusion of this number will make it easier to process your request in a timely manner. If you know your Client ID#, enter it. If you are a new client to DEP, skip to the next request for information.

DEP Client Type Code. Enter the code that represents the type of client acting as the responsible authority for the permitted activity. The list of Client Type Codes can be found on the 'Codes Client Type' document included with this package and are also available on the DEP web site under Department-wide General Information/Codes, Contacts & Maps.

Organization Name or Registered Fictitious Name. Clients must provide the name under which they conduct the activity or business in which the permit or other authorization will be issued.

SECTION B. LANDFILL SITE (LANDFILL OR PROCESSING FACILITY) INFORMATION

DEP Site ID#. A Department-wide unique identification number is assigned to the site after site information is entered into DEP's computer system (eFACTS). This one number identifies the site regardless of the program with which the applicant is working. This identification number will be identified on future correspondence from DEP as well as on site information available on our DEP web site. When interacting with DEP, inclusion of this number will make it easier to process your application in a timely manner. If you know your Site ID#, enter it. If you are identifying a new site to DEP, skip to the next request for information.

Site Name. The name of the site (i.e., landfill) at the specific physical location. Do not use abbreviations, acronyms, etc.

Landfill Permit ID#. Provide the Landfill Permit ID number.

Site Contact Information. Provide the name of the person having overall responsibility for environmental matters at the site. Include the individual's name, title and email address.

SECTION C. GENERATOR CLIENT (GENERATOR OF THE WASTE) INFORMATION

Company Name. Identify the company name. The generator of the waste is a second client associated with this application (the first client being the landfill owner). Include the company's mailing address, phone number and email address. Provide the DEP Generator ID number.

Company Contact. Identify the company's contact and include the contact's phone number and email address.

Subsidiary/Parent Company. If the company identified is a subsidiary, identify the name of the parent company.

Waste Generation & Storage Location. If the waste generated is not at the company's mailing address, describe the location of the waste generation and storage; and provide the township, county, and state.

SECTION D. WASTE DESCRIPTION

Residual Waste. Enter the code that represents the type of residual waste. The list of Residual Waste Codes (RWC) can be found on the 'Codes Residual Waste' document included with this package. Also include the code's description, the amount of waste; the unit of measurement, and the timeframe for disposal/processing. If the timeframe is 'one time' check the box; if other than 'one time' provide the appropriate timeframe.

1. GENERAL PROPERTIES

- a. **pH Range.** Indicate the pH range based on analyses or knowledge.
- b. **Physical State.** Check appropriate box to indicate physical state.
- c. **Physical Appearance.** Describe the color and odor of the waste. Enter the number of solid and/or liquid phases of separation and describe each phase. For example, two phases: one yellow oily liquid and one gray granular solid.
- d. **Hazardous Waste Determination.** Check the appropriate box to indicate if information certifying that a hazardous waste determination has been done and the waste is not hazardous waste as defined in 40 CFR 261, as incorporated by reference at 25 Pa. Code 261a.1.

Caution: Certification must be supplied with the submitted application in order for the application to be administratively and technically complete.

- e. **Treated Hazardous Waste.** Check the appropriate box to indicate if the waste is treated hazardous waste. If 'Yes', list the hazardous waste code(s) that apply to the hazardous waste before treatment. If 'Yes', provide the selected option; and include what limit was required to be met by the treatment option. Check the appropriate box to indicate if you are providing a copy of the certification required under 40 CFR 268.7(a), as incorporated by reference at 25 Pa. Code 268a.1, that the waste meets all the land disposal restriction requirements, as specified in 40 CFR Part 268, Subpart D.
- f. **Delisted Hazardous Waste.** Check the appropriate box to indicate if the waste has been de-listed as a hazardous waste by DEP or US EPA.

- g. Waste Accepted at Another PA Facility.** Check the appropriate box to indicate if the waste has been accepted for disposal/processing at another Pennsylvania facility. If 'Yes', list the Facility ID number(s).
- h. Application Submitted for Waste at Another PA Facility.** Check the appropriate box to indicate if an application for disposal/processing of the waste at another Pennsylvania facility has been submitted. If 'Yes', list the Facility ID number(s).

2. CHEMICAL ANALYSIS ATTACHMENTS

- a. Physical & Chemical Characterization.** Check the appropriate box to indicate if a detailed physical and chemical characterization of the waste and its leachate has been conducted. If 'No', provide a detailed explanation supporting the use of generator knowledge in lieu of actual chemical analysis. If 'Yes', check the appropriate box to indicate if a description of the waste sampling method, in accordance with the waste sampling plan as required in §271.611(a)(3) or §287.132(a)(3), is attached.

At this time, the Department is waiving the chemical analysis required in this section for individual residual waste streams generated at a rate of **less** than 2,200 lbs. per month per generating location and are not destined for disposal at Class III residual waste landfills. At its discretion, the Department may decide this waiver is not appropriate for 'specific' waste streams and will notify the generator and/or facility that the chemical analysis of the waste stream is required. This waiver in no way affects the responsibility of the generator under 40 CFR 262.11, as incorporated by reference at 25 Pa. Code 262a.1, to determine whether or not the waste is hazardous waste.

The analytical methodologies used shall be those set forth in the most recent edition of the EPA's Test Methods for Evaluating Solid Waste (SW-846), Methods for Chemical Analysis of Water and Wastes (EPA 600/4-79-020), Standard Methods for the Examination of Water and Wastewater (prepared jointly by the American Public Health Association, American Water Works Association, and Water Environment Federation), or a comparable method subsequently approved by EPA or the Department.

The person taking the samples and the laboratory performing the analysis shall employ the quality assurance/quality control procedures described in the EPA's Test Methods for Evaluating Solid Waste (SW-846) or Handbook for Analytical Quality Control in Water and Wastewater Laboratories (EPA 600/4-79-019).

All analyses submitted must specify the method used and any special preparation, deviation from the method, or pertinent observations. Each analysis sheet must include: *date of sampling, date of analysis, name of laboratory performing test, laboratory contact person and phone number.* Analytical determinations should be run on the samples, as is, unless otherwise specified in the cited method. Report the analyses in mg/kg on a dry weight basis for solids or in mg/L for liquids, or as otherwise specified in cited method.

No single analytical method is applicable for all waste streams and some modifications may be necessary for unusual waste types. Any modifications, however, must be approved by the Department.

For contaminated soil, the top twelve inches of soil should be removed prior to sampling. Unless otherwise approved by the Department, a minimum of one sample shall be taken for every 250 cubic yards of contaminated soil. Field screening methods may be employed to reduce the number of samples required, provided by the screening method and if pre-approved by the Department. For samples used to determine volatile organics (VOCs), EPA Method 5035 shall be employed on grab samples. Composite sampling shall not be used to determine volatile organics. Attach a map of the spill or cleanup site including a diagram of the sample collection area.

If the sample is of unknown origin or characteristics, contact the appropriate Department regional office prior to analysis.

The analysis must include the following list of parameters as specified by facility type unless generator certifies in writing the absence of the parameter based on his or her knowledge of the manufacturing or pollution control processes:

- Parameters for all facilities:
 - pH
 - Ignitability
 - Reactive Sulfide
 - Reactive Cyanide
 - Toxicity Characteristic Leaching Procedure (TCLP) - include all parameters found in 40 CFR 261.24, as incorporated by reference at 25 Pa. Code 261a.1, as well as pH of extract. Report all results in mg/L or as otherwise specified in method.
- Additional parameters for Class I residual waste and municipal waste disposal facilities:
 - Additional TCLP parameters - copper, nickel, zinc
 - Free Liquids
 - PCBs
 - Water Leaching Procedure (ASTM) Method D3987) - COD, Total Solids, Oil and Grease or Petroleum Hydrocarbons, and Ammonia-Nitrogen. Report all results in mg/L or as otherwise specified in method.
 - Total Solids
 - Total Volatile Solids
 - Total Oil and Grease or Petroleum Hydrocarbons
 - For contaminated soil, TCLP results for other contaminants found in the soil. [Note: if an acidic extraction fluid is inappropriate for a particular parameter(s), a water leaching procedure (ASTM Method D3987) may be used.
- Additional parameters for Class II and Class III residual waste disposal facilities:
 - All additional parameters required for Class I facilities in B.
 - Additional TCLP parameters - iron, manganese.
 - Phenolics.
 - Additional Water Leaching Procedure parameters - chloride, cyanide, fluoride, nitrate, nitrite, sulfate, total organic halide.
- Other additional parameters for disposal facilities may be necessary due to the nature of the waste or conditions at the disposal facility. Constituents which could exceed the leachate limit for the class of facility, impact the liner, leachate treatment, air quality, compatibility to other wastes disposed at the facility, or induce harm to facility personnel should be identified and quantitated by generator. The facility operator or the Department may also require the determination of additional parameters for these reasons.
- The use of alternate leaching procedures for determining waste acceptability in monofills may be allowed by the Department.

- Additional Parameters for Processing Facilities may be necessary due to the nature of the waste processing and to comply with conditions of the facility permit. In addition, constituents which could impact the process, compatibility of process residuals from waste with treatment system, air quality, compatibility to other wastes processed at the facility, or induce harm to facility personnel should be identified and quantitated by generator. The facility operator or the Department may also require the determination of additional parameters for these reasons.

b. **Laboratory Registration Number.** Also provide the Laboratory Registration Number.

3. PROCESS DESCRIPTION & SCHEMATIC ATTACHMENTS

a. **Manufacturing and/or Pollution Control Processes.** Check the appropriate box to indicate if a detailed description of the manufacturing and/or pollution control processes producing the waste is attached. If this documentation is not attached, provide an explanation as to why they are not attached.

Describe the manufacturing process that produced the waste and any pollution control methods involved. This must include the raw materials used in the process, any intermediate products formed, final products, and any substances added during treatment. For non-hazardous waste, provide sufficient detail to demonstrate the waste is not a listed hazardous waste. For example:

"Resol Resin Manufacture"

"These resins are formed by reacting phenol, or a substituted phenol with formaldehyde which contains an excess of formaldehyde. An alkali (sodium hydroxide) is used to catalyze the polymerization which takes place at a pH of between 8 and 11 and at a temperature of 60°C."

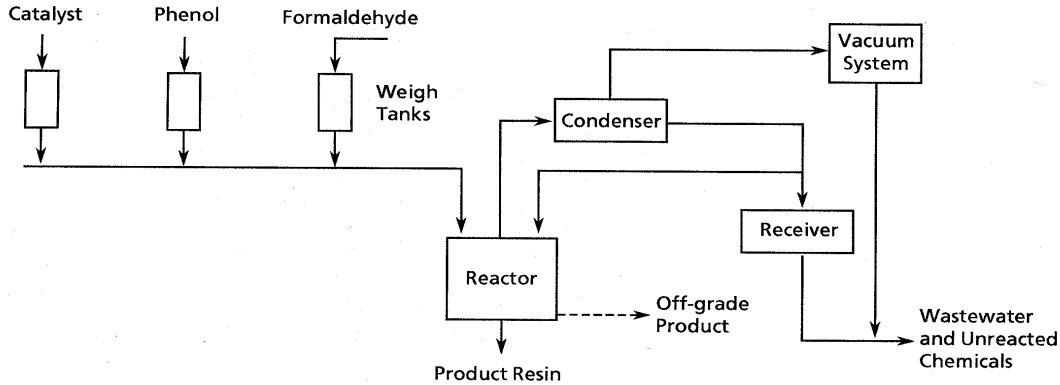
"When the desired degree of polymerization has occurred, the kettle is cooled to about 35°C to inhibit further reaction. The caustic may be neutralized in the kettle with sulfuric acid at this time. The water from this distillation forms a concentrated waste of unreacted materials and low molecular weight resin."

"The batch is dumped, and depending on the specific resin, the batch may be washed several times and a vacuum may be used during the dehydration cycle. It is important that molten resin be handled quickly to avoid its setting up to an insoluble, infusible mass which would become a waste."

For contaminated soil, describe the source of the contamination and type of facility where spill occurred. If manufacturing, indicate the products and raw materials produced, used, or stored in the vicinity of the spill, discharge, or release. If a waste management facility, indicate the wastes processed, treated, disposed, or stored in the vicinity of the spill or release. If the source of contamination was from spills or release of virgin petroleum fuel only, use Form FC-1 instead of this form.

b. **Schematic of Manufacturing and/or Pollution Control Processes.** Check the appropriate box to indicate if a schematic of the manufacturing and/or pollution control processes producing the waste is attached.

Provide, on 8½ x 11" size paper, flow schematics of the manufacturing and/or pollution control processes generating the waste stream starting with the raw materials and ending with the final products. (See example below.)



c. **Confidentiality Claim.** Check the appropriate box to indicate if the substantiation for a confidentiality claim (if portions of the information submitted are confidential) is attached.

Information submitted to the Department in this portion of the form may be claimed as confidential by the applicant. If no claim is made at the time of submission, the Department shall make the information available to the public without further notice.

Claim of confidentiality shall address the following:

- The portions of the information claimed to be confidential.
- The length of time the information is to remain confidential.
- The measures taken to guard undesired disclosure of the information to others.
- The extent to which the information has been disclosed to others and the precautions taken in connection with that disclosure.
- A copy of pertinent confidentiality determinations by EPA or any other federal agency.
- The nature of the substantial harm to the competitive position by disclosure of the information, the reasons it should be viewed as substantial, and the relationship between the disclosure and the harm.

4. CHEMICAL ANALYSIS WAIVER

Waiving of Chemical Analysis. Categories of residual wastes that qualify for the waiving of chemical analysis by the Department are listed on the form. Check the appropriate box(es) that match the waste proposed to be accepted for disposal. All waste types not listed on the form must be approved (in writing) in the permit by the Department prior to processing or disposal facility acceptance.

The Department may waive chemical analysis requirements for categories of residual wastes. Wastes which have the potential to be hazardous or may adversely impact liner system or leachate treatability do not qualify for this waiver.

Check the appropriate box(es) that matches the waste from the list provided. Typically, the qualifying residual wastes will include wood wastes, fabric/cloth/textile/leather wastes, waste paper, waste plastics, carpet wastes, etc.

In addition, other residual wastes may be considered and approved provided adequate documentation and justification are submitted to the Department by the processing or disposal facility operator and approved in the permit. A petition for such a waiver should include a demonstration to the Department's satisfaction, if additional analysis of a waste is not necessary, to determine that the waste can be received at the facility without adversely affecting the effectiveness of waste processing operations and established emission and wastewater discharge limits.

SECTION E. PROPOSED PROCESSING, STORAGE AND/OR DISPOSAL METHOD

Special Handling Procedures. Check the appropriate box to indicate if any special handling procedures (besides direct disposal) described in the waste acceptance plan will be used when managing the waste.

If 'Yes', briefly describe the method proposed to **process** this waste stream. For example, "Solvent removed from waste by solvent recovery apparatus to less than 1% solvent. Recovered solvent is sold to XYZ, Inc. for reclamation. Solids are polymerized and the remaining solvent is driven off by heat."

If 'Yes', briefly describe the method proposed to **store** this waste stream and its compatibility with the storage container, the waste pile liner, or the surface impoundment liner. For example, "Paint waste is placed into 55 gal. steel drums and is proposed to be stored at the XYZ Waste Disposal Company's storage building for 60 days prior to processing. The paint waste is compatible with its container and the other wastes stored in the immediate vicinity. The proposed location for the paint waste within the building is indicated on the attached drawing."

If 'Yes', briefly describe the method proposed to **dispose** of this waste stream. For example, "Polymerized solids are to be placed in a segregated cell of XYZ Waste Disposal Company with compatible wastes as indicated on the attached drawing. The cell is located at coordinates D-7. The cell design has been approved as part of the facility permit."

Material Re-Used. Check the appropriate box to indicate if this material is re-used for construction or operation of the facility. If 'Yes', briefly describe a viable alternative to your proposal.

SECTION F. SOURCE REDUCTION STRATEGY

Form 25R, Source Reduction Strategy. Form 25R must be completed by the generator and attached to this application unless waived in the instructions to that form. Check the appropriate box to indicate if a completed Form 25R is attached; or has been waived.

SECTION G. CERTIFICATION OF PROCESSING OR DISPOSAL FACILITY

The application must be certified in the following manner:

- *Corporation.* A corporate officer must sign the document and the corporate seal must be affixed.
- *Limited Partnerships.* A general partner must sign the document.
- *All Other Partnerships.* A partner must sign the document.
- *Sole Proprietorships.* The proprietor must sign the document.
- *Municipal, State, or Federal Authority or Agency.* An executive officer or ranking elected official responsible for compliance of the authority's or agency's waste activities and facilities with all applicable regulations must sign the document.

- The *general manager* or *chief operator* of the facility must sign the document.

APPLICANT'S CHECKLIST

To assure your application is complete, we are providing a convenient checklist of what may need to be attached to the application as well as who to contact for additional information. This checklist is optional and need not be returned with the completed application.

DEP OFFICES

Department-wide general information to assist the client with appropriate DEP contact information for regional, central, and district mining offices and the counties they serve can be found on the 'Contacts & DEP Offices' document included with this package. This information is also available on the DEP web site under Department-wide General Information/Codes, Contacts & Maps.