is/are found to meet or exceed the regulatory level(s) specified in Table 1, the waste is subject to regulation as hazardous waste.


The “total waste analysis” approach may be used in lieu of the TCLP as described in EPA RCRA Online document RO 13647. This approach may be used to make a preliminary determination of whether the waste could exhibit the toxicity characteristics and therefore whether a TCLP analysis will be required to determine toxicity. Total waste analysis identifies the actual concentration of a contaminant in a waste. For a solid phase waste analyzed under this approach, the results are conveyed in mg/Kg.

A copy of RCRA Online Document RO 13647 is attached hereto as Exhibit ANR-SS-5.

Q11. What qualifies as a “representative sample”?

A11. The methods used for sampling waste materials will vary with the form and consistency of the waste materials to be sampled. Samples must be representative of the waste being evaluated and the contaminant(s) of concern. Given the difficulty of sampling structural debris representatively following demolition, it is best to obtain samples from a structure prior to demolition. Either a core sample or cross sectional piece of the structure to be