

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

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4 A copy of EPA Test Method 1311 in “Test Methods for Evaluating Solid Waste,
5 Physical/Chemical Methods”, EPA Publication SW-846 is attached hereto as **Exhibit**
6 **ANR-SS-43**.

7
8 The “total waste analysis” approach may be used in lieu of the TCLP as described in EPA
9 RCRA Online document RO 13647. This approach may be used to make a preliminary
10 determination of whether the waste could exhibit the toxicity characteristics and therefore
11 whether a TCLP analysis will be required to determine toxicity. Total waste analysis
12 identifies the actual concentration of a contaminant in a waste. For a solid phase waste
13 analyzed under this approach, the results are conveyed in mg/Kg.

14
15 A copy of RCRA Online Document RO 13647 is attached hereto as **Exhibit ANR-SS-54**.

16
17 **Q11. What qualifies as a “representative sample”?**

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