Special Waste Authorizations (SWA’s)
567 IAC 109

Provides safe, proper, disposal management:

– Threat to human health
– Threat to environment
– Difficult to manage
– Analytical review
Who initiates SWA’s?

➢ The Department
  ▪ 3 General Special Wastes 567—109.11(455B,455D) PCS, Asbestos, Grit & Bar Screenings
  ▪ Unique/Unfamiliar waste issues such as Biodiesel waste, Bakken Oil waste

➢ The Landfill
  ▪ Assistance with analytics
  ▪ Can they accept it?
  ▪ Waste flow
  ▪ Special handling

➢ Waste generator
  ▪ Familiar with their waste
Why the Concern?

Transfer Station Fire

Worker safety: Can toxic wastes sneak in?

Transportation issues

Landfill fire
SWA denied for 3 reasons:

➢ It is not a special waste, no special handling is required.
➢ It is hazardous and cannot be landfilled (Subtitle D MSW landfill) in Iowa.
➢ A reuse has been found!
Examples of rule updates

- CRT Rule (2006)
- Solvent Wipes Rule (2013)
- Hazardous Waste Generator Improvements Rule (5/2017)
- Airbag rule (2018)
- Electronic manifest (6/2019)
- Pharmaceutical Rule (8/2019)
- Aerosol Can rule (2/2020)
- Retail Strategy
- Definition of solid waste
Hazardous Waste Generator Improvements Rule

- Includes over 60 changes to RCRA
- Reorganized the regulations
- Effective in Iowa (May 2017)
Pharmaceutical rule
Iowa - 2019

Last updated on March 8, 2021
Waste Determinations

§ 262.11(a) The hazardous waste determination for each solid waste must be made

– at the point of waste generation,

– before any dilution, mixing, or other alteration of the waste occurs,

– and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the RCRA classification of the waste may change.
MSDS’s are **not** required to list any carcinogenic components under .1% and non-carcinogenic components under 1%.

**Do the math:**

- .1% = 1,000 ppm
- 1% = 10,000 ppm
How it was generated may dictate regulations for disposal

### TCLP Metals and Volatile Organic Compounds, Pesticides, Semi-Volatile Organic Compounds and Herbicides

<table>
<thead>
<tr>
<th>Metals</th>
<th>Volatile Organic Compounds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contaminant</td>
<td>EPA HW #</td>
</tr>
<tr>
<td>Arsenic</td>
<td>D004</td>
</tr>
<tr>
<td>Barium</td>
<td>D005</td>
</tr>
<tr>
<td>Cadmium</td>
<td>D006</td>
</tr>
<tr>
<td>Chromium</td>
<td>D007</td>
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<tr>
<td>Lead</td>
<td>D008</td>
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<tr>
<td>Mercury</td>
<td>D009</td>
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<tr>
<td>Selenium</td>
<td>D010</td>
</tr>
<tr>
<td>Silver</td>
<td>D011</td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Pesticides

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>EPA HW #</th>
<th>Regulatory Level</th>
<th>Contaminant</th>
<th>EPA HW #</th>
<th>Regulatory Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlordane</td>
<td>D020</td>
<td>0.03 mg/L</td>
<td>o-Cresol</td>
<td>D023</td>
<td>200.0 mg/L</td>
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<tr>
<td>Endrin</td>
<td>D012</td>
<td>0.02 mg/L</td>
<td>m-Cresol</td>
<td>D024</td>
<td>200.0 mg/L</td>
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<tr>
<td>Heptachlor (and its epoxide)</td>
<td>D031</td>
<td>0.008 mg/L</td>
<td>p-Cresol</td>
<td>D025</td>
<td>200.0 mg/L</td>
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<tr>
<td>Lindane</td>
<td>D013</td>
<td>0.4 mg/L</td>
<td>Cresol</td>
<td>D026</td>
<td>200.0 mg/L</td>
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<tr>
<td>Methoxychlor</td>
<td>D014</td>
<td>10.0 mg/L</td>
<td>1,4-Dichlorobenzene</td>
<td>D027</td>
<td>7.5 mg/L</td>
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<tr>
<td>Toxaphene</td>
<td>D015</td>
<td>0.5 mg/L</td>
<td>2,4-Dinitrotoluene</td>
<td>D030</td>
<td>0.13 mg/L</td>
</tr>
<tr>
<td>Hexachlorobenzene</td>
<td>D032</td>
<td>0.13 mg/L</td>
<td>Hexachlorobutadiene</td>
<td>D033</td>
<td>0.5 mg/L</td>
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<tr>
<td>Hexachloroethane</td>
<td>D034</td>
<td>3.0 mg/L</td>
<td>Nitrobenzene</td>
<td>D036</td>
<td>2.0 mg/L</td>
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</table>

### Herbicides

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>EPA HW #</th>
<th>Regulatory Level</th>
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</thead>
<tbody>
<tr>
<td>2,4-D</td>
<td>D016</td>
<td>10.0 mg/L</td>
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<tr>
<td>2,4,5-TP (Silvex)</td>
<td>D017</td>
<td>1.0 mg/L</td>
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### RCRA Hazardous Waste Codes

- **D035** – Ingredient in paint, unknown etc.
- **F005** – Used for solvent purposes
- **U159** – Pure chemical product

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IOWA DEPARTMENT OF NATURAL RESOURCES
KAYLA LYON, DIRECTOR
What do I look for when reviewing an SWA?

- Did the waste generator make an accurate waste determination?
- Can the waste be reused?
- Did they mix several or similar waste streams?
- Did they run the correct testing and the correct methods?
- Look up chemical names and CAS numbers
- Listed waste, ‘derived from’ waste, ‘contained in’ waste,
- Was there any treatment and do LDR’s apply,
- Sampling – did they do enough sampling, grab or composite
- Did they do Totals mg/kg or TCLP mg/L, If using totals, is sample near 100% solid?
- Results in ppm or ppb?
- How will it be delivered to landfill, bags, barrels, loose, etc.
- Did the waste originate in the planning area of generation?
- Did they use an Iowa Certified lab?
- How old is the lab data?
- Did they use an SDS?
- Is it from the correct facility?
- Can I provide them with waste assistance?
- Does the landfill have a SWAC (Special Waste Acceptance Criteria)
- Pass the Paint filter test?
- Weight or Volume of waste, one time or ongoing
- Is it OSHA hazardous?  Worker precaution
Resources to Assist Iowa Waste Generators

- Iowa Waste Exchange - IWE
- Iowa Waste Reduction Center - IWRC
- Pollution Prevention Program – DNR
- Special Waste Program - DNR
- Iowa DNR field offices
- EPA Region 7
- Regional Collection Centers for Household Hazardous Waste