Special Waste Authorization (SWA)
Frequently Asked Questions

Question 1: What is a Special Waste?

A special waste means any industrial process waste, pollution control waste, or toxic waste which presents a threat to human health or the environment or a waste with inherent properties which make the disposal of the waste in a sanitary landfill difficult to manage. Examples include, paint filters, treatment sludge, misc. contaminated soils, incinerator ash, misc. food product waste etc.

a. What Prompts a Special Waste Authorization?
   - Unmanageable or unsafe quantity
   - Packaging concerns
   - Waste mixture concerns
   - Immediate disposal concerns
   - Unfamiliar waste for landfill/waste generator
   - Possible hazardous waste concerns
   - Possible health or environmental concerns

Question 2: What is a SWA?

It is up to each landfill if they wish to request a SWA from the department. Occasionally, the waste generator feels that their waste should be handled as a special waste and in this case, they need to relay this information to the landfill. A SWA form will be filled out and sent to the landfill with the necessary testing etc. Once the landfill reviews the information, they will send it on for the department's review at the address below:

Iowa Department of Natural Resources
Attn: Mike Smith
6200 Park Ave Ste 200
Des Moines, IA 50321

For further questions, call 515-229-8356

Question 3: What is the paint filter test (PFT)?

The PFT determines the presence of free liquids in the sorbent/waste mixture. Free liquid means the liquid produced when a 100-milliliter or 100-gram representative sample is placed on a standard mesh number 60 (fine mesh size) conical paint filter for five minutes. The sample is left standing for 5 minutes. Any free liquid visible below the funnel indicates sample failure. Landfills cannot accept waste that does not pass the paint filter test as it is considered free liquids. To find a lab to run the PFT, see question 8.

Question 4: What is a SWAC?

SWAC stands for **Special Waste Acceptance Criteria** and all landfills have one for each special waste they accept. A SWAC details what necessary precautions are needed and how the special waste should be handled for disposal.

Question 5: How do I find a landfill who will accept my waste?

Waste generated in the state must follow comprehensive planning. In other words, waste generated in a particular area, must be disposed of in accordance with that city's comprehensive plan. To find out what area your city is in and what landfill your waste needs to go to, visit the DNR website for comprehensive planning area map, descriptions and area contacts.

What if a landfill will not accept my special waste?

Iowa Administrative Rules (IAC) 567 subrule 104.3(2). Duties of cities and counties states, "

If a planning agency refuses any particular solid waste type for management or disposal, the planning agency must identify another municipal solid waste sanitary disposal project for that waste within the planning area. If no other municipal solid waste sanitary disposal project exists within the planning area, the planning agency must, in cooperation with the waste generator, establish or arrange for access to another municipal solid waste sanitary disposal project. Municipal solid waste sanitary disposal projects are required to maintain written approval from both the department and the planning agency in the planning area of origin in order to accept any Iowa-generated waste from outside the planning area." The department

procedures for facilities that do not accept a special waste is to designate a facility that has agreed to accept the waste.

The designation procedure is as follows:

- A letter from the landfill in the solid waste comprehensive solid waste planning area from which the waste originated stating that they will not accept that particular waste and request to designate another facility as the alternative disposal site.
- A letter in return from the alternate disposal facility stating that they will accept the waste sent from the landfill in the planning area from where the waste originated.
- Copies of each letter need to be submitted to the Land Quality Bureau.
- If you have any questions or concerns regarding this procedure or comprehensive planning, visit the Comprehensive Planning Website.

Question 6: Can I mix my Special waste load with other waste?



No. The waste must arrive to the landfill as a separate load, as stated in IAC 102.506(2). The Special Waste Acceptance Criteria (SWAC) on file with the landfill pertains to this special waste and will need to be handled according to the SWAC on file, (see question # 4). Mixing the special waste could create problems with disposal and your waste may be turned away by the landfill. The waste must also go directly to the landfill and cannot be brought to a transfer station.

Question 7: What is a TCLP? (tee-clip)



The TCLP (Toxicity Characteristic Leaching Procedure) is one of the Federal EPA test methods that are used to characterize waste as either hazardous or non-hazardous and the leaching characteristics for the purpose of disposal. Waste that is hazardous may not be landfilled in Iowa. To pass the TCLP, the leachate must be below regulatory limits codified in 40 CFR 261.24. Waste characterization requires a representative sample. At least two samples of a material are required for any estimate of precision. **The result is only as good as the sample obtained.** You cannot make good decisions due to poor sampling. Your goal should be correct, defendable, cost-effective decisions that represent the waste population of interest.

Question 8: Who is responsible for making a hazardous waste determination?

Any person who generates a solid waste must determine if that waste is a hazardous waste. The SW-846 test methods are approved by EPA for use in complying with RCRA regulations. Generators must conduct a hazardous waste determination according to the hierarchy specified in 40 CFR § 262.11.

Question 9: Where can I find a lab to run analytical testing on my waste?

The **Iowa Waste Reduction Center** keeps a list of laboratories for environmental analytical testing. Make sure the laboratories detection limits are low enough to make an accurate waste determination in accordance with 40 CFR 261.24. (For example: if the lab detection limits for mercury is 0.5 mg/L, but regulatory level is 0.2 mg/L. This testing result would not show a waste determination, as the waste still could be hazardous).

Question 10: How can “generator knowledge” be used for waste characterization?

If a waste generator uses generator knowledge alone or in conjunction with sampling and analysis, detailed documentation must be maintained that clearly demonstrates the information is sufficient to identify the waste. This may include consideration of the raw materials that constitute the waste and/or the processes that result in the waste being generated.

The knowledge that is applied must be valid and verifiable. It should be noted that, more often than not, it is easier to use knowledge of the waste to characterize it as hazardous, than it is to characterize it as non-hazardous. Because accurate waste determinations is such a critical factor for demonstrating compliance with RCRA, misidentification can render the facility liable for enforcement actions, so although sampling and analysis are not as economical or convenient, it does has its advantages.