US ERA ARCHIVE DOCUMENT

EPA Independent Waste Sampling Strategy for BP Oil Spill Waste

EPA, or its contractors, will collect samples of waste that are temporarily collected at selected waste staging areas to ensure that all the waste is properly characterized.*

A representative sample of the following waste streams (if available) will be collected at each of the chosen staging areas:

- 1. Oily solid waste
- 2. Liquid waste, this includes:
 - a. Liquids sent for underground injection, and/or
 - b. Non-reclaimable liquids sent for disposal.

Samples will be collected, handled, and analyzed in accordance with the appropriate EPA Regional policy and protocol.

Solid waste will be analyzed for:

- Toxicity Characteristic Leaching Procedure Volatiles by SW-846 Method 1311/8260B
- Toxicity Characteristic Leaching Procedure Semivolatile Compounds by SW-846 Method 1311/8270D
- Toxicity Characteristic Leaching Procedure Resource Conservation and Recovery Act List Metals by SW-846 Method 1311/6010C and SW-846 Method 1311/7470A
- Free Liquids by SW-846 Method 9095B Paint Filter Liquids Test

Liquid waste will be analyzed for:

- Toxicity Characteristic Leaching Procedure Volatiles by SW-846 Method 1311/8260B
- Toxicity Characteristic Leaching Procedure Semivolatile Compounds by SW-846 Method 1311/8270D
- Toxicity Characteristic Leaching Procedure Resource Conservation and Recovery Act List Metals by SW-846 Method 1311/6010C and Method 1311/7470A
- Ignitability by SW-846 Method 1010/1020

BP and the State Incident Commanders will be notified prior to EPA sampling the waste.

Sampling will be conducted two times per month at selected waste staging areas.

Based on sample results and waste handled at staging areas, this plan may be modified.

*The daily waste tracking information submitted by BP, which contains the type and quantity of waste handled at each staging area, will serve as the basis for selecting staging areas for sampling.