SUBSTANTIVE POLICY STATEMENT

This Substantive Policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated partied or include confidential information or rules made in accordance with the Arizona Administrative Procedure Act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties, you may petition the agency under Arizona Revised Statutes section 41-1033 for a review of the statement.

MOTOR VEHICLE SHREDDER RESIDUE SAMPLING FACT SHEET

Motor Vehicle Shredder Residue:

Motor vehicle shredder residue is the waste from the shredding of motor vehicles. A motor vehicle is any vehicle used to transport people or property that is propelled by means other than muscle power.

Choosing a Sampling Protocol:

Sampling requirements for motor vehicle shredder residue (shredder residue) are contained in Arizona Administrative Code (A.A.C.) R18-13-1307. Sample collection must be done using one of the two collection methods established in rule, or by an alternative method that is consistent with "Test Methods for Evaluating Solid Waste," (EPA SW-846, 3rd Edition, Volume II, Chapter Nine). If you elect to use an alternative sampling method, you must submit a written sampling plan to ADEQ for review and approval at least 2 weeks prior to the sampling event.

Sampling Protocol:

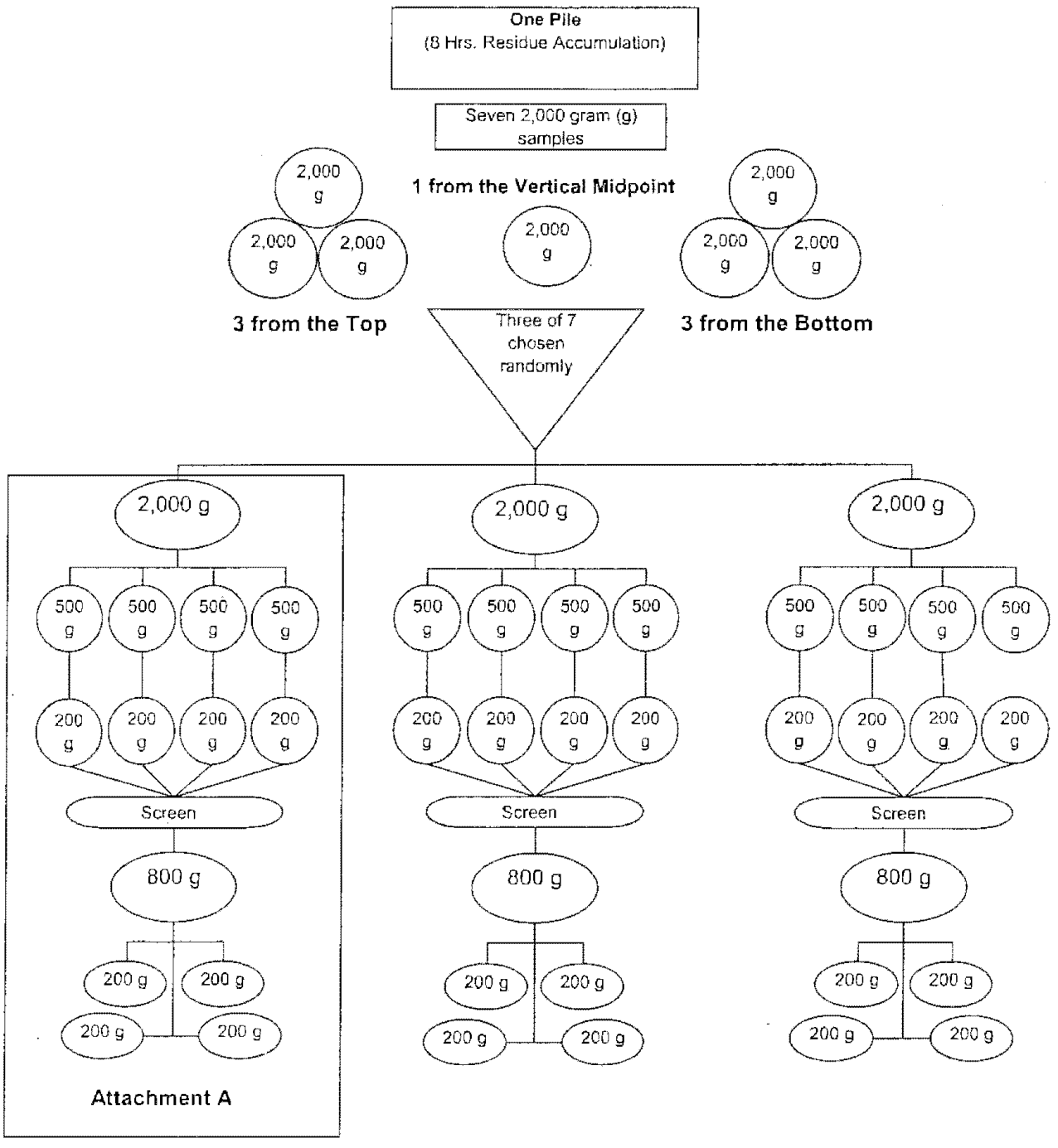
Attached you will find flow diagrams depicting both sampling procedures described in rule. These flow diagrams should be used in conjunction with the special waste rules to ensure that sampling is conducted properly. These flow diagrams are intended to provide a visual representation of the sampling process that will assist you in better understanding each of the sampling procedures. They are not intended to be used as a replacement for the sampling procedures described in the special waste rules.

Questions?:

If you have any questions regarding the sampling requirements for shredder residue, please feel free to contact:

Randy Ballard at (602) 207-4703, or toll free at (800) 234-5677 ext. 4703
Kim McDaniel at (602) 207-4121, or toll free at (800) 234-5677 ext. 4121

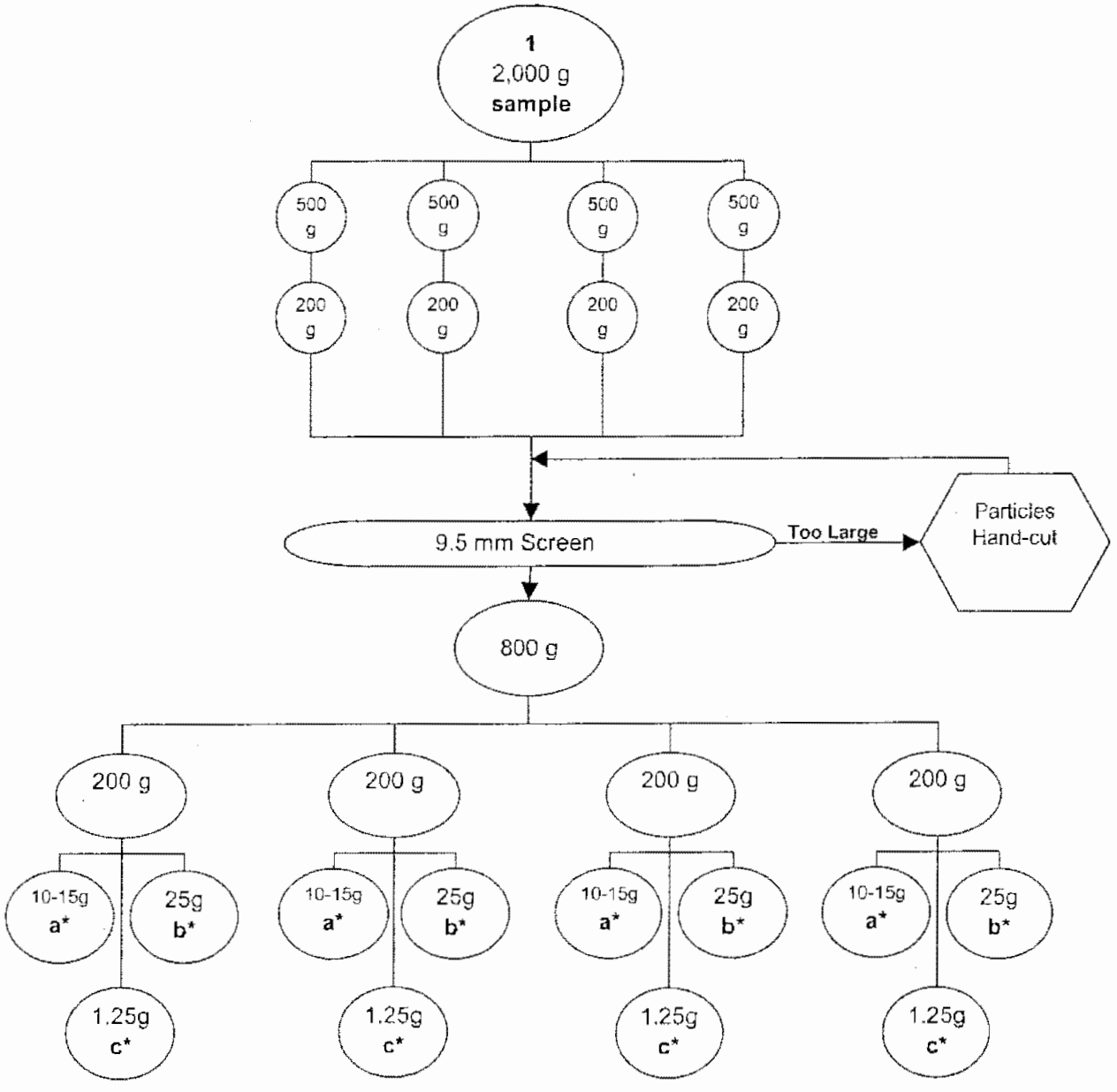
SAMPLE METHOD 1



ATTACHMENT A

Note: Attachment A represents one of three 2000g samples.

Therefore, sampling and analysis procedures below must be conducted 3 times.



a* - PCB analysis: All four 10-15g samples from each 2000g sample will be analyzed for PCBs

b* - TCLP analysis for constituents of 40 CFR 261.24, Table I (Metals, Volatiles, Semivolatiles)

Volatiles & Semivolatiles: All four 25g samples from each 2000g sample will be analyzed for these constituents

Metals Analysis: Of the three 2000g samples selected at random:

1) Analyze one 2000g sample for arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver

***That means four 25g samples will be collected from one of the 2000g samples*

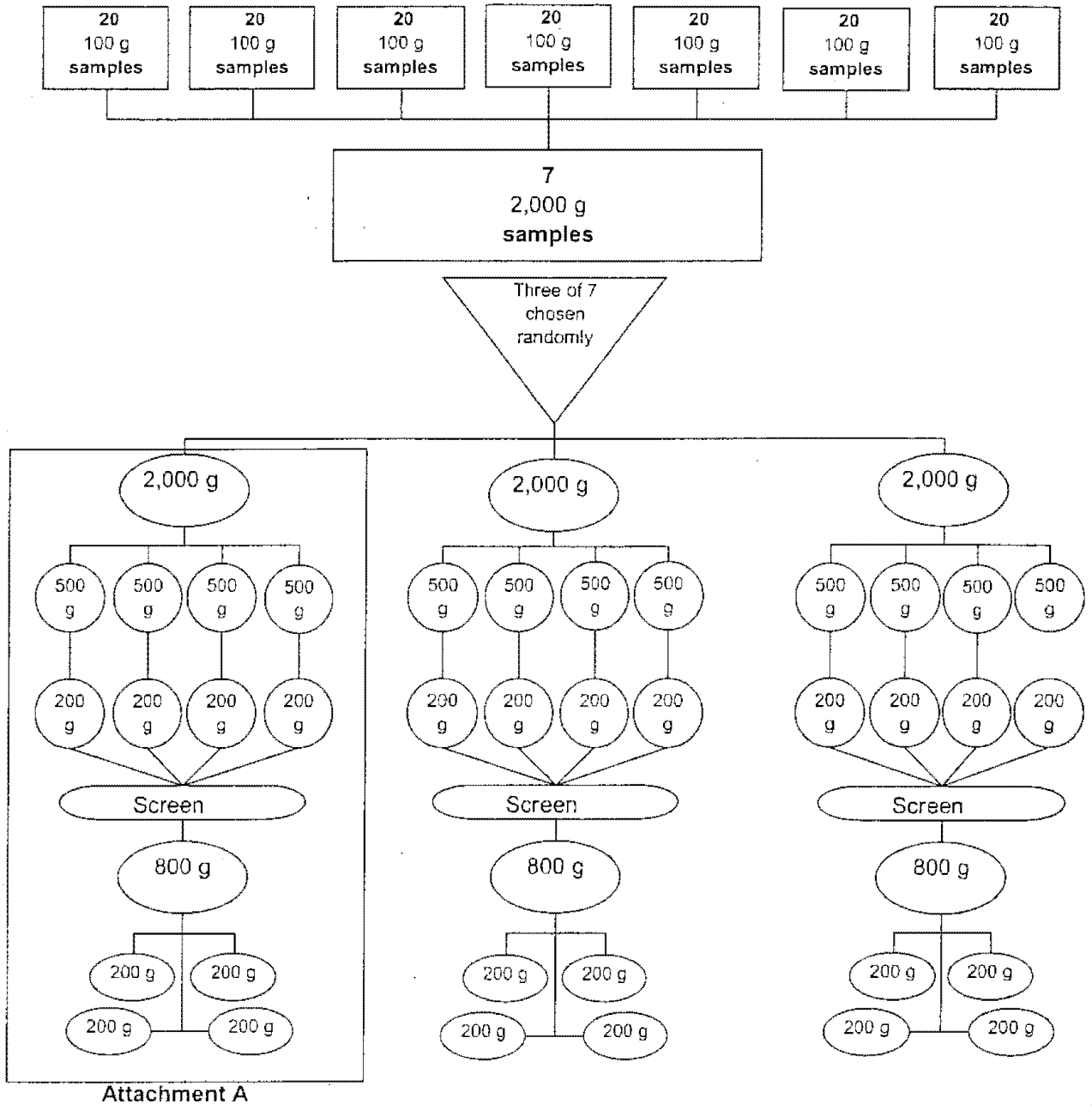
2) Analyze the remaining two 2000g samples for extractable cadmium and lead

***That means four 25g samples from each of the remaining two 2000g samples for a total of eight 25g samples*

c* - Extraction Fluid Determination

SAMPLE METHOD 2

Seven Piles of ≥ 500 lbs. of Shredder Residue are formed

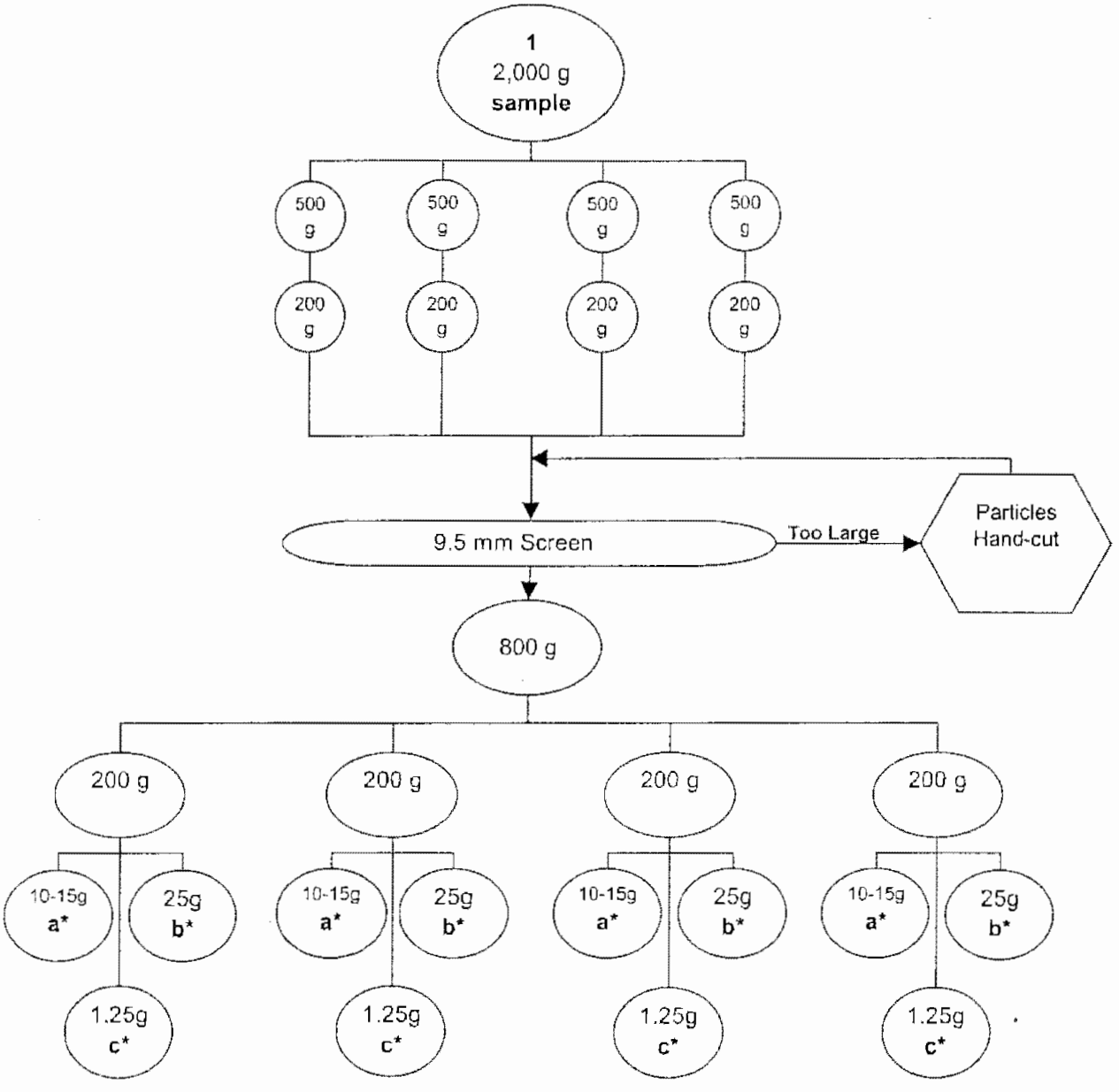


Attachment A

ATTACHMENT A

Note: Attachment A represents <u>one</u> of three 2000g samples.

Therefore, sampling and analysis procedures below must be conducted <u>3</u> times.



a* - PCB analysis: All four 10-15g samples from each 2000g sample will be analyzed for PCBs

b* - TCLP analysis for constituents of 40 CFR 261.24, Table I (Metals, Volatiles, Semivolatiles)
<u>Volatiles & Semivolatiles</u>: <u>All four</u> 25g samples <u>from each</u> 2000g sample will be analyzed for these constituents

<u>Metals Analysis</u>: Of the three 2000g samples selected at random:
1) Analyze <u>one</u> 2000g sample for arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver
**That means four 25g samples will be collected from <u>one of the</u> 2000g samples*
2) Analyze the remaining <u>two</u> 2000g samples for extractable cadmium and lead
**That means <u>four</u> 25g samples from each of the <u>remaining two</u> 2000g samples for a total of <u>eight</u> 25g samples*

c* - Extraction Fluid Determination