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| 1056. PCB Reporting and Recordkeeping Relief | ENCORE | JAN 12, 2014 |
| 1057. Commercial Chemical Products and Unused Batteries | ENCORE | JAN 16, 2014 |
| 1058. PCB Annual Records Retention Timeframes | | JAN 31, 2014 |
| 1059. Satellite Accumulation within a ≤90-day Accumulation Area | | FEB 7, 2014 |
| 1060. PCB Certificate of Disposal Relief | ENCORE | FEB 13, 2014 |
| 1061. Used Oil and Weekly Inspections | | FEB 20, 2014 |
| 1062. Bags and RCRA Container Definition | | FEB 27, 2014 |
| 1063. Product Storage Tank Residues and Hazardous Waste Regulations | ENCORE | MAR 6, 2014 |
| 1064. Spent Lead-Acid Batteries and Accumulation Time Limits | | MAR 13, 2014 |
| 1065. Land Disposal Restrictions and Dates of Accumulation | | MAR 23, 2014 |
| 1066. Universal Waste Accumulation Time Limits and the One Year Rule | | MAR 29, 2014 |
| 1067. PCB Manifest Discrepancy Reports and Estimated Waste Weights | | APR 6, 2014 |
| 1068. PCB Wastes, Independent Transporters and Confirmation of Receipt | | APR 10, 2014 |
| 1069. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients | ENCORE | APR 20, 2014 |
| 1070. Other Paint Wastes and the Applicability of the F001-F005 Listings | ENCORE | APR 24, 2014 |
| 1071. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents | | MAY 1, 2014 |
| 1072. TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs" | ENCORE | MAY 8, 2014 |
| 1073. Purpose of Keeping a Hazardous Waste Container Closed | ENCORE | MAY 15, 2014 |
| 1074. PCB Containers and Multiple Removed From Service Dates | | MAY 22, 2014 |
| 1075. Satellite Accumulation and RCRA Personnel Training | | MAY 29, 2014 |
| 1076. Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers | | JUN 5, 2014 |
| 1077. Universal Waste and Nonhazardous Batteries | | JUN 12, 2014 |
| 1078. Universal Waste and Incandescent Bulbs | | JUN 19, 2014 |
| 1079. The PCB Mark and the Fields "Also Contact" and "Tel No" | ENCORE | JUN 29, 2014 |
| 1080. Halon Fire Extinguishers - Banned or Not Banned? | ENCORE | JUL 5, 2014 |
| 1081. Cabinets as RCRA Containers | ENCORE | JUL 13, 2014 |
| 1082. LDR Storage Prohibitions and Treated Wastes | ENCORE | JUL 17, 2014 |
| 1083. LDR Treatment Standards and F001 "Chlorinated Fluorocarbons" | ENCORE | JUL 24, 2014 |
| 1084. RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants | ENCORE | JUL 31, 2014 |
| 1085. Universal Wastes, Manifesting and DOT Shipping Names | | AUG 7, 2014 |
| 1086. CERCLA Hazardous Substances – A Brief Definition | | AUG 14, 2014 |
| 1087. CERCLA Hazardous Substances – The Petroleum Exclusion | | AUG 21, 2014 |
| 1088. PCB Concentration Assumptions for Use vs. PCB Disposal | ENCORE | AUG 28, 2014 |
| 1089. Universal Waste and Basis for the One Year Accumulation Time Limit | | SEP 4, 2014 |
| 1090. Product Spills and Waste Determinations | ENCORE | SEP 11, 2014 |
| 1091. PCB Concentrations and 10,000 PPM | | SEP 18, 2014 |
| 1092. PCB Concentrations and 1,000 PPM | | SEP 25, 2014 |
| 1093. Universal Waste Alkaline Batteries and Self-Transportation | | OCT 2, 2014 |
| 1094. Universal Waste Lithium Batteries and Self-Transportation | | OCT 9, 2014 |
| 1095. Universal Waste Batteries and Closed Containers | ENCORE | OCT 16, 2014 |
| 1096. PCB Containers and Concentration of PCBs | | OCT 23, 2014 |
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| 1098. Satellite Accumulation Requirements in Washington State | ENCORE | NOV 6, 2014 |
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| 1100. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch | ENCORE | NOV 20, 2014 |
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| 1102. The Household Waste Exclusion and Renovation Debris | | DEC 4, 2014 |
| 1103. The Household Waste Exclusion and Renovation Debris – Part II | | DEC 11, 2014 |
| 1104. PCB Ballasts and Disposal Options | ENCORE | DEC 18, 2014 |
| 1105. 'Twas the Night Before Christmas – The Twenty-Second Edition | | DEC 24, 2014 |
| 1106. Printed Circuit Board Recycling – Shredded vs. Whole | ENCORE | JAN 1, 2015 |
| 1107. Satellite Accumulation and Product Vessel Cleanouts | | JAN 8, 2015 |
| 1108. Date of Accumulation for Hazardous Waste and Receipt of Analytical Information | | JAN 15, 2015 |
| 1109. Conservative Declarations that Material is a Hazardous Waste | | JAN 22, 2015 |
| 1110. Hazardous Waste Generator Tanks and the Date of Accumulation Marking | ENCORE | JAN 29, 2015 |

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, Senior Environmental Compliance Officer
CHPRC Environmental Protection, Hanford, WA

SUBJECT: HAZARDOUS WASTE GENERATOR TANKS AND THE DATE OF ACCUMULATION MARKING

DATE: JANUARY 29, 2015

| <u>CHPRC Projects</u> | <u>CH PRC - Env. Protection</u> | <u>MSA</u> | <u>Hanford Laboratories</u> | <u>Other Hanford Contractors</u> | <u>Other Hanford Contractors</u> |
|--|--|---|---|--|---|
| Richard Austin Tania Bates Ty Blackford Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Westcott Jeff Widney | Brett Barnes Ron Brunke Bill Cox Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams | Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Don Rokkan Lana Strickling Lou Upton Christina Zerby | Alan Campbell Grant McCalmant <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine | Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Judith Nielsen Mandy Pascual Kirk Peterson Jean Quigley | Mark Rollison Dan Saueressig Merrie Schilperoort Joelle Stamm Glen Triner Greg Varljen Julie Waddoups Kyle Webster Ted Wooley |

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TWO MINUTE TRAINING

SUBJECT: Hazardous Waste Generator Tanks and the Date of Accumulation Marking

Q: A large quantity generator (LQG) accumulates hazardous waste in ≤90-day containers and ≤90-day tanks. The generator understands that per WAC 173-303-200(c) [40 CFR 262.34(a)(2)] each container must be marked with the accumulation start date and that per WAC 173-303-200(d) [40 CFR 262.34(a)(3)] each container and tank must be marked with the words “Dangerous Waste” or “Hazardous Waste”, and specifically in Washington state, the major risk(s). But what about the accumulation start date for tanks; must ≤90-day tanks be marked with an accumulation start date?

A: According to an [EPA RCRA Call Center Monthly Report dated June 2003](#):

“The LQG must also mark hazardous waste accumulation tanks with the date upon which the hazardous waste accumulation period begins. Although this requirement is not cited in Section 262.34(a)(2), EPA intended for both tanks and containers to be marked with accumulation start dates (51 FR 10146, 10160; March 24, 1986). This requirement ensures that LQGs accumulate hazardous waste in accordance with the 90-day accumulation time limit.”

Furthermore, the March 24, 1986, Federal Register on page 10160 states:

*“Section 262.34 contains the requirements for generators that accumulate hazardous waste on-site. Under § 262.34(a), a generator may accumulate hazardous waste on-site in tanks or containers in any quantity for up to 90 days without the need to have interim status or obtain a storage permit under RCRA (or comply with Parts 264 or 265) provided the generator complies with the limited requirements of § 262.34. These requirements specify that: (i) **the date upon which the period of accumulation begins is clearly marked on the tank or container**; [emphasis added] (ii) the tank or container is labeled with the words “Hazardous Waste”; (iii) the generator complies with Subparts C and D of 40 CFR Part 265 ...”*

Therefore, even though current regulations at WAC 173-303-200 and 40 CFR 262.34 do not specify that LQG tanks be marked with an accumulation start date, the intention to mark ≤90-day tanks with an accumulation start date is the same as the requirement to mark ≤90-day containers.

SUMMARY:

- The regulations state that LQG containers must be marked with an accumulation start date.
- The regulations do not state that LQG tanks must be marked with an accumulation start date.
- However, the March 24, 1986, Federal Register clearly stated EPA’s intent that LQG tanks, like LQG containers, be marked with an accumulation start date.

WAC 173-303-200(1) and the June 2003 EPA Monthly Report are attached to the e-mail. If you have any questions, please contact me at “Paul_W_Martin@rl.gov” or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 1/22/15

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Hazardous Waste Generator Tanks and the Date of Accumulation Marking

WAC 173-303-200 Accumulating dangerous waste on-site.

(1) A generator, not to include transporters as referenced in WAC 173-303-240(3), may accumulate dangerous waste on-site without a permit for ninety days or less after the date of generation, provided that:

(a) All such waste is shipped off-site to a designated facility or placed in an on-site facility which is permitted by the department under WAC 173-303-800 through 173-303-845 or recycled or treated on-site in ninety days or less. The department may, on a case-by-case basis, grant a maximum thirty day extension to this ninety day period if dangerous wastes must remain on-site due to unforeseen, temporary and uncontrollable circumstances. A generator who accumulates dangerous waste for more than ninety days is an operator of a storage facility and is subject to the facility requirements of this chapter and the permit requirements of this chapter as a storage facility unless he has been granted an extension to the ninety day period allowed pursuant to this subsection;

(b) The waste is placed:

(i) In **containers** and the generator complies with WAC 173-303-630 (2), (3), (4), (5), (6), (8), (9), (10), and 40 CFR Part 265 Subparts AA, BB, and CC incorporated by reference at WAC 173-303-400 (3)(a). For **container** accumulation (including satellite areas as described in subsection (2) of this section), the department may require that the accumulation area include secondary containment in accordance with WAC 173-303-630(7), if the department determines that there is a potential threat to public health or the environment due to the nature of the wastes being accumulated, or due to a history of spills or releases from accumulated **containers**. In addition, any new **container** accumulation areas (but not including new satellite areas, unless required by the department) constructed or installed after September 30, 1986, must comply with the provisions of WAC 173-303-630(7); and/or

(ii) In **tanks** and the generator complies with 40 C.F.R. Part 265 Subparts AA, BB, and CC incorporated by reference at WAC 173-303-400 (3)(a) and 173-303-640 (2) through (10), except WAC 173-303-640 (8)(c) and the second sentence of WAC 173-303-640 (8)(a). (Note: A generator, unless otherwise required to do so, does not have to prepare a closure plan, a cost estimate for closure, or provide financial responsibility for his **tank** system to satisfy the requirements of this section.) Such a generator is exempt from the requirements of WAC 173-303-620 and 173-303-610, except for WAC 173-303-610 (2) and (5); and/or

(iii) On drip pads and the generator complies with WAC 173-303-675 and maintains the following records at the facility:

(A) A description of procedures that will be followed to ensure that all wastes are removed from the drip pad and associated collection system at least once every 90 days; and

(B) Documentation of each waste removal, including the quantity of waste removed from the drip pad and the sump or collection system and the date and time of removal; and/or

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(iv) In containment buildings and the generator complies with 40 CFR Part 265 Subpart DD, which is incorporated by reference, and the generator has placed its independent qualified registered professional engineer certification that the building complies with the design standards specified in 40 C.F.R. 265.1101 in the facility's operating record no later than sixty days after the date of initial operation of the unit. Where subpart G and H are referenced in 40 C.F.R. 265.1102, replace them with WAC 173-303-610 and 173-303-620. After February 18, 1993, PE certification will be required prior to operation of the unit. The owner or operator must maintain the following records at the facility:

(A) A written description of procedures to ensure that each waste volume remains in the unit for no more than ninety days, a written description of the waste generation and management practices for the facility showing that they are consistent with respecting the ninety-day limit, and documentation that the procedures are complied with; or

(B) Documentation that the unit is emptied at least once every ninety days.

(c) The date upon which each period of accumulation begins is marked and clearly visible for inspection on each container;

(d) While being accumulated on site, each **container** and **tank** is labeled or marked clearly with the words "dangerous waste" or "hazardous waste." Each **container** or **tank** must also be marked with a label or sign which identifies the major risk(s) associated with the waste in the **container** or **tank** for employees, emergency response personnel and the public (note: If there is already a system in use that performs this function in accordance with local, state, or federal regulations, then such system will be adequate). The department may also require that a sign be posted at each entrance to the accumulation area, bearing the legend, "danger--unauthorized personnel keep out," or an equivalent legend, written in English, and legible from a distance of twenty-five feet or more; and

(e) The generator complies with the requirements for facility operators contained in:...

EPA530-R-03-002f

RO 14683

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT

June 2003

1. Start Dates on Large Quantity Generator Tanks

A large quantity generator (LQG) accumulates hazardous waste in both tanks and containers. The generator labeled each container with the date upon which the accumulation period began in accordance with 40 CFR Section 262.34(a)(2). Must this LQG also mark the accumulation start date on tanks that are used to accumulate hazardous waste?

The LQG must also mark hazardous waste accumulation tanks with the date upon which the hazardous waste accumulation period begins. Although this requirement is not cited in Section 262.34(a)(2), EPA intended for both tanks and containers to be marked with accumulation start dates (51 FR 10146, 10160; March 24, 1986). This requirement ensures that LQGs accumulate hazardous waste in accordance with the 90-day accumulation time limit.

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DATE: 1/22/15

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