

<u>SUBJECT</u>		<u>DATE</u>
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
1097. Recyclable Chemicals and Zombie Destruction		OCT 31, 2014
1098. Satellite Accumulation Requirements in Washington State	ENCORE	NOV 6, 2014
1099. Satellite Accumulation and "At or Near"		NOV 13, 2014
1100. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE	NOV 20, 2014
1101. Defining Criteria for Household Waste Exclusion	ENCORE	NOV 26, 2014
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		JAN 29, 2015
1111. Universal Waste, Satellite Accumulation and Centralized Collection Areas		FEB 5, 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: UNIVERSAL WASTE, SATELLITE ACCUMULATION AND CENTRALIZED COLLECTION AREAS

DATE: FEBRUARY 5, 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: Universal Waste, Satellite Accumulation and Centralized Collection Areas

Q: A customer has been collecting universal waste at multiple locations throughout the customer's facility. The customer has been keeping the universal waste collection areas "at or near" the original point of generation analogous to the satellite accumulation area (SAA) requirements. However, the customer would like to routinely consolidate the multiple universal waste locations to a centralized collection point for ease of shipment preparation. Is universal waste required to be collected near the original point of generation analogous to the SAA requirements?

A: Per the May 11, 1995 Federal Register on page 25527 it states:

"The Agency has decided not to add a provision analogous to the satellite accumulation provision to the universal waste regulations for several reasons."

Those reasons basically included: 1), universal waste handlers already manage their universal wastes very similarly to SAA requirements in that the number of locations is not limited. 2), unlike unlimited accumulation time for SAAs, universal waste is limited to one year of accumulation; however, if universal waste needs to be accumulated for more than one year the generator can exceed the one-year limit if the accumulation is necessary to facilitate proper recovery, treatment or disposal. And 3), since the goal of the universal waste regulations was to make the regulation clear and easy to work with for both the regulated community and the implementing agencies, EPA believed that having one consistent time limit for all universal waste managed at one site was an important goal.

Since the customer "may" accumulate universal waste at multiple locations, the converse is true that the customer may also accumulate universal waste in one centralized location. In this sense, universal waste accumulation is more analogous to <90-day accumulation areas, i.e., a generator can generate hazardous waste at multiple locations and accumulate the waste in a centralized accumulation area.

SUMMARY:

- Universal waste regulations do not limit the accumulation location or the number of locations.
- The SAA requirements do not apply to universal waste, e.g., "at or near" does not apply.
- A universal waste handler can accumulate at the point of generation or at a centralized area.

An excerpt from the May 11, 1995 Federal Register is 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: 2/5/15

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Universal Waste, Satellite Accumulation and Centralized Collection Areas

25527 Federal Register / Vol. 60, No. 91 / Thursday, May 11, 1995 / Rules and Regulations

“The Agency has decided not to add a provision analogous to the satellite accumulation provision to the universal waste regulations for several reasons. **First**, under the universal waste final rule, handlers may already manage their wastes very similarly to management under the satellite accumulation provision. For example, the proposed and final universal waste regulations do not limit the location, or number of locations, at which a handler of universal waste may accumulate universal wastes. Thus a handler may continue to accumulate universal wastes at points of generation. A handler may accumulate these wastes for up to one year (which is two or four times longer than the 90 or 180 days allowed under the existing hazardous waste generator regulations), and under the revised final regulation a handler may accumulate universal waste for longer than one year if certain conditions are met. Further, the quantity of universal waste that can be accumulated at a point of generation is not limited to 55 gallons (a handler of universal waste must notify, however, if the total quantity of universal wastes accumulated on-site equals or exceeds the 5,000 kilogram notification limit). The only substantive additional requirement under the universal waste rule will be to mark or label the container (or use an alternate method) to document the earliest date any universal waste accumulated at the location became a waste.

Second, although the time limit may appear to be a constraint when compared to the satellite accumulation provision, with the revision discussed above, handlers of universal waste who need to accumulate wastes for more than one year to facilitate proper recovery, treatment, or disposal will have the option to do so. The handler, however, bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. In addition, the Agency points out that the existing satellite accumulation provisions are available only to regulated generators who have EPA identification numbers and are complying with the full part 262 requirements including 90- or 180-day accumulation time limits 40 CFR 262.34 accumulation unit standards, biennial reports, and manifests. The Agency does not believe it would be appropriate to allow unlimited accumulation time for handlers of universal waste who are not required to comply with the part 262 controls, but are instead following the streamlined requirements of the universal waste regulations.

Third, the Agency points out that one of its major goals in developing the universal waste regulations is to make the regulation clear and easy to work with for both the regulated community and implementing agencies. The Agency believes that having one consistent time limit for all universal waste managed at one site is important to this goal. The Agency also notes that handlers of universal waste who generate extremely small quantities of hazardous waste (<100 kg per month) would, under the final rule, still have the option to manage their wastes under the Conditionally Exempt Small Quantity Generator provisions of 40 CFR 261.5 rather than the universal waste regulations (or the full Subtitle C regulations).”

FROM: Paul W. Martin

DATE: 2/5/15

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PG: 2

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