

<u>SUBJECT</u>		<u>DATE</u>
1056. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
1057. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	APR 30, 2015
1058. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAY 7, 2015
1059. Decharacterized Wastes, <90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAY 14, 2015
1060. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAY 21, 2015
1061. Hazardous Debris Macroencapsulation and Size Reduction	ENCORE	MAY 28, 2015
1062. Universal Waste Lamps and Prohibition on Crushing		JUN 4, 2015
1063. F003 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 11, 2015
1064. F001 - F005 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 18, 2015
1065. Macroencapsulation of Hazardous Debris and Presence of Free Liquids	ENCORE	JUN 25, 2015
1066. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries		JUL 1, 2015
1067. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	JUL 9, 2015
1068. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils		JUL 16, 2015
1069. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 23, 2015
1070. Conditioned Exclusion for Characteristic Debris Treated via Immobilization		JUL 30, 2015
1071. RCRA Personnel Training and Classroom Training vs. Online Training		AUG 6, 2015
1072. PCB Decontamination Standards with No Decontamination Performed		AUG 13, 2015
1073. PCB Manifest Exceptions a.k.a. When is a PCB Manifest Not Required	ENCORE	AUG 19, 2015
1074. PCB Manifest Relief a.k.a. When is a PCB Manifest Not Required – The Sequel		AUG 27, 2015
1075. Hazardous Debris and Radioactively Contaminated Cadmium Batteries	ENCORE	SEP 3, 2015
1076. Hazardous Debris and Radioactively Contaminated Lead Acid Batteries	ENCORE	SEP 10, 2015
1077. Mercury Wet Cell Batteries - Debris or Not Debris	ENCORE	SEP 17, 2015
1078. Hazardous Debris and Non-Radioactive Lead Acid Batteries		SEP 24, 2015
1079. Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE	OCT 1, 2015
1080. CAS Numbers and the Hazardous Waste "U" and "P" Listings	ENCORE	OCT 8, 2015
1081. Universal Waste One Year Accumulation and Multiple Handlers	ENCORE	OCT 15, 2015
1082. LDR Notifications and F001-F005 Constituents of Concern	ENCORE	OCT 29, 2015
1083. LDR Notifications and F001-F005 Constituents of Concern – Again	ENCORE	NOV 5, 2015
1084. LDR Notifications and F001-F005 Constituents of Concern - One Last Time	ENCORE	NOV 12, 2015
1085. DOT and Terminal Protection of Alkaline Batteries	ENCORE	NOV 19, 2015
1086. Used Oil and Keeping Containers Closed – WAC 173-303 vs. 40 CFR 279		NOV 24, 2015
1087. PCB Weight Determinations	ENCORE	DEC 3, 2015
1088. Satellite Accumulation Requirements and Container Inspections	ENCORE	DEC 10, 2015
1089. 'Twas The Night Before Christmas - The Twenty-Third Annual Edition	ENCORE	DEC 24, 2015
1090. Satellite Accumulation and 85-Gallon Containers	ENCORE	DEC 31, 2015
1091. PCB Date Removed From Service Notations – On the Item or In a Log	ENCORE	JAN 7, 2016
1092. The Date Removed From Service Marking on the PCB Mark	ENCORE	JAN 14, 2016
1093. Generator Weekly Inspection Log Documentation – Federal vs. WA State	ENCORE	JAN 21, 2016
1094. Used Oil and Weekly Inspections	ENCORE	JAN 28, 2016
1095. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date	ENCORE	FEB 4, 2016
1096. PCB Containers and Multiple Removed From Service Dates	ENCORE	FEB 11, 2016
1097. Generator Inspection Logs and Corrective Action Documentation	ENCORE	FEB 18, 2016
1098. PCB Concentrations and Micrograms per Centimeters Squared (µg/cm <sup>2</sup> )		FEB 25, 2016
1099. RCRA Empty Containers and Removing as Much Waste as Possible	ENCORE	MAR 3, 2016
1100. PCB Incineration and "Six Nines" Destruction Removal Efficiency Criteria	ENCORE	MAR 10, 2016
1101. RCRA Treatment and the Two-Part Definition		MAR 17, 2016

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## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** RCRA TREATMENT AND THE TWO-PART DEFINITION

**DATE:** MARCH 17, 2016

<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 Roni Ashley Tania Bates Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Marty Martin Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Widney	Brett Barnes Mitch Boyd Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Sasa Kosjerina Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Ray Swenson 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 Christina Robison Don Rokkan Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter 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 Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson Jean Quigley	Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Jeff Westcott Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** RCRA Treatment and the Two-Part Definition

**Q:** A customer has hazardous debris in the form of a fairly large piece of equipment. To secure the bulky equipment in the shipping container, the customer would like to pour a shallow layer of grout in the bottom of the waste container to ensure that the waste equipment does not shift during transportation, i.e., it is not a form of macroencapsulation. Since the RCRA definition of treatment includes wording about making waste “safer to transport”, is this grouting activity considered RCRA treatment?

**A:** [WAC 173-303-040](#), “Definitions” [[40 CFR 260.10](#)] defines “treatment” as:

*“The physical, chemical, or biological processing of dangerous waste to make such wastes nondangerous or less dangerous, safer for transport, amenable for energy or material resource recovery, amenable for storage, or reduced in volume, with the exception of compacting, repackaging, and sorting as allowed under [WAC 173-303-400\(2\)](#) and [WAC 173-303-600\(3\)](#).”*

As clarified in an Office of Solid Waste and Emergency Response (OSWER) Directive [[9432.05\(84\)](#)], dated November 6, 1984, EPA stated that the definition of treatment is made up of two parts:

1. The change in the waste’s character affected by treatment, and;
2. The purpose of the change. Purposes include: to neutralize, to recover energy or material resources, to render such waste non-hazardous, safer to transport, store or dispose; amenable for recovery, amenable for storage, or reduced in volume.

Since the definition of treatment includes two parts, the customer’s grouting activity would have to change the physical, chemical or biological character of the waste and be for the purpose of making the waste safer to transport. The grout will make the equipment safer to transport but will not change the physical, chemical, or biological character of the waste, i.e., the hazardous debris is just as hazardous before and after the grouting so no change in waste character has occurred; therefore, no RCRA treatment has occurred.

As an analogous example, an EPA guidance letter dated November 26, 1984 ([RO 12335](#)) clarified that if a generator dissolved plastic bags containing cyanide waste, treatment had not occurred. The purpose of dissolving the bags did change the physical character of the waste but the purpose of the change was to facilitate disposal. Removal of the plastic bags did not make the wastes nonhazardous, less hazardous, or safer to transport or dispose, etc., so both parts of the definition of treatment were not met.

Therefore, the customer could grout the hazardous debris equipment to secure the waste container and no RCRA treatment would occur. The two parts of RCRA treatment would not be met since the waste’s character will not be changed, even though the waste will be safer to transport.

### SUMMARY:

- The RCRA definition of treatment includes two parts: a change in the waste character and the purpose of the change.
- If both parts of the definition are met, then RCRA treatment has occurred.
- If both parts of the definition are not met, RCRA treatment has not occurred.

The EPA guidance letters dated November 6, 1984, and November 26, 1984 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:** 3/17/16

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** RCRA Treatment and the Two-Part Definition

Part 260 Subpart B – Definitions

DOC: 9432.05(84)

Key Words: Treatment

Regulations: 40 CFR 260.10

Subject: Definition of Treatment as Defined in 40 CFR 260.10 Subpart B – Definitions

Addressee: James Scarbrough, Chief, Residuals Management Branch, Region IV

Originator: John H. Skinner, Director, Office of Solid Waste

Source Doc: #9432.05(84)

Date: 11-6-84

Summary:

The definition of treatment is made up of two parts:

- 1) The change in the waste's characters affected by treatment.
- 2) The purpose of the change. Purposes include: to neutralize, to recover energy or material resources, to render such waste non-hazardous, safer to transport, store or dispose; amenable for recovery, amenable for storage, or reduced in volume.

To be considered treatment, facility processes must serve one of the purposes listed in No. 2 above when changing the waste's character.

**FROM:** Paul W. Martin

**DATE:** 3/17/16

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** RCRA Treatment and the Two-Part Definition

PPC 9432.1984(05)

TREATMENT AS DEFINED IN 40 CFR 260.10 SUBPART B

NOV 26 1984

MEMORANDUM

**SUBJECT:** Definition of Treatment; Application to

Great Lakes Carbon Corp.

**FROM:** John H. Skinner, Director  
Office of Solid Waste (WH-562)

**TO:** James Scarbrough, Chief  
Residuals Management Branch  
EPA Region IV

We have reviewed and interpreted the definition of treatment as defined in 40 CFR 260.10, Subpart B - Definitions. The definition is made up of two parts: the change in the waste's character effected by treatment and the purpose of the change. Based on this definition, the process proposed by Great Lakes Carbon Corporation (GLCC) does not constitute treatment. GLCC's plan to add water to the cyanide contained in dissolvable plastic bags will change the physical character of the cyanide waste. However, the purpose of this change is to facilitate disposal. The change will not make the waste safer to dispose. None of those purposes listed in the definition, that is to neutralize; to recover energy or material resources; to render such waste non-hazardous or less hazardous safer to transport, store, or dispose; or amenable for recovery, amenable for storage, or reduced in volume, apply to the process proposed by GLCC.

If you have any questions, please contact Mr. Thomas Baugh of the Waste Treatment Branch at FTS 382-2550.es Carbon Corp.

**FROM:** Paul W. Martin

**DATE:** 3/17/16

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**PG:** 3

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