	SUBJECT		DATE
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^2)		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
1102.	D002 Waste and Dilution as Adequate LDR Treatment	ENCORE	MAR 24, 2016
1103.	Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit		MAR 31, 2016
1104.	Satellite Accumulation and Process Location Changes	ENCORE	APR 7, 2016
1105.	Satellite Accumulation Prior to and After Recycling		APR 14, 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: *SATELLITE ACCUMULATION PRIOR TO AND AFTER RECYCLING*

DATE: *APRIL 14, 2016*

CHPRC Projects	CH PRC - Env. Protection	MSA	Hanford Laboratories	Other Hanford Contractors	Other Hanford Contractors
Richard Austin	Brett Barnes	Jerry Cammann	(TBD)	Bill Bachmann	Dan Saueressig
Roni Ashley	Mitch Boyd	Jeff Ehlis		Dean Baker	Merrie Schilperoort
Tania Bates	Ron Brunke	Garin Erickson	**DOE RL, ORP, WIPP**	Scott Baker	Joelle Moss
Bob Cathel	Bill Cox	Lori Fritz		Lucinda Borneman	Glen Triner
Rene Catlow	Laura Cusack	Panfilo Gonzales Jr.	Mary Beth Burandt	Paul Crane	Greg Varljen
Richard Clinton	Lorna Dittmer	Dashia Huff	Duane Carter	Tina Crane	Julie Waddoups
Larry Cole	Rick Engelmann	Mark Kamberg	Cliff Clark	Jeff DeLine	Jay Warwick
John Dent	Ted Hopkins	Edwin Lamm	Mike Collins	Ron Del Mar	Kyle Webster
Brian Dixon	Sasa Kosjerina	Candice Marple	Tony McKarns	John Dorian	Jeff Westcott
Eric Erpenbeck	Jim Leary	Saul Martinez	Ellen Mattlin	Mark Ellefson	Ted Wooley
Stuart Hildreth	Dale McKenney	Jon Perry	Greg Sinton	Darrin Faulk	
Mike Jennings	Jon McKibben	Thomas Pysto	Scott Stubblebine	Joe Fritts	
Stephanie Johansen	Rick Oldham	Christina Robison		Tom Gilmore	
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Melvin Lakes	Fred Ruck	Lana Strickling		Gene Grohs	
Marty Martin	Ray Swenson	Lou Upton		James Hamilton	
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Stuart Mortensen	Lee Tuott			Ryan Johnson	
Anthony Nagel	Daniel Turlington			Dan Kimball	
Dean Nester	Dave Watson			Megan Lerchen	
Dave Richards	Joel Williams			Richard Lipinski	
Phil Sheely				Charles (Mike) Lowery	
Connie Simiele				Michael Madison	
Jennie Stults				Terri Mars	
Michael Waters				Cary Martin	
Jeff Widney				Grant McCalmant	
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TWO MINUTE TRAINING

SUBJECT: Satellite Accumulation Prior to and After Recycling

Q: In last week's Two Minute Training (2MT), we learned that a satellite accumulation area (SAA) is not mobile and cannot be moved to a new location. BUT WHAT IF, a customer has an SAA that is accumulating discarded aerosol paint cans that are destined for onsite recycling via an aerosol puncturing device that will generate waste paint and scrap metal in separate containers. Can one or both of these containers also be managed as SAAs?

A: According to WAC 173-303-200(2)(c) [*40 CFR 262.34(c)(2)*], once an SAA has exceeded the 55-gallon limit for dangerous/hazardous waste (or the 1 quart limit for acutely hazardous waste), the excess waste must be transferred to the generator's ≤90-day or ≤180-day or ≤270-day accumulation area, or to an interim status or permitted storage facility. In the customer's scenario, the SAA waste - aerosol cans - are transferred to a recycling unit that is exempt from permitting as noted at WAC 173-303-120(4) [*40 CFR 261.6(c)(1)*]. The aerosol can puncturing device (the recycling unit) punctures the aerosol cans and collects the residual paint waste in a 55-gallon container below the puncturing device. The now empty aerosol cans are collected in a separate 55-gallon container as scrap metal for recycle. Since the puncturing is a form of treatment, the paint waste is a new point of generation which allows the waste paint drum to be managed as a new SAA. In this scenario the original SAA waste did not get transferred to another SAA, since it was transferred to an exempt treatment unit and following the new point of generation was accumulated in a new SAA.

An EPA letter dated May 3, 1989, (RO 13280) has an analogous clarification concerning a generator's waste exiting a recycling unit and whether or not the waste is allowed another 90-day accumulation period. EPA stated:

"Wastes or residues from recycling activities are considered to be newly generated wastes and therefore are also allowed a 90 day accumulation period without a permit."

Concerning the scrap metal container, since scrap metal destined for recycling is exempt from RCRA regulation per WAC 173-303-071(3)(ff) [*40 CFR 261.6(a)(3)(ii)*], the 55-gallon container of scrap metal is not an SAA and is just a 55-gallon container of scrap metal destined for recycle.

SUMMARY:

- In general, an SAA cannot be transferred to another SAA.
- An SAA must be transferred to a designated accumulation or storage area.
- SAA waste exiting a recycling treatment unit is a new point of generation and can therefore be accumulated in a new SAA.

The May 3, 1989, EPA letter 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.

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SUBJECT: Satellite Accumulation Prior to and After Recycling

9451.1989(01)

RECYCLING ACTIVITIES

MAY 3 1989

Alan H. McLean
Hughes Hubbard and Reed
Madison Avenue
New York, New York 10017

Dear Mr. McLean:

This letter is in response to your letter dated March 2, 1989, requesting a written interpretation of aspects of the Resource Conservation and Recovery Act (RCRA) implementing regulations applicable to recycling activities (40 CFR Parts 124, 264, 265, 266, 268 and 270). It is my understanding that Environmental Technology Group's (ETG's) operation involves a mobile recycling unit that visits hazardous waste generator sites. Used solvents are pumped into the mobile unit through hoses connected to the generators' storage tanks or containers and a horizontal thin film evaporator is applied to reclaim reusable solvents. The reusable solvents are then pumped back into the generator's product tanks or containers. All rinsings and non-recoverable residues exiting from the mobile unit are placed in waste containers and remain on-site as the property of the generator.

In your letter, you reached several tentative conclusions regarding the applicability of certain RCRA regulations to your process. I have discussed those Federal regulations below to clarify how they would apply to your activities. However, it should be noted that in states that are authorized to implement the RCRA program, the state regulations, rather than Federal regulations, are applicable. The state program can be broader-in-scope or more stringent than the Federal counterpart, so ETG should check all applicable state standards before deploying its mobile recycling units.

The first question raised is, who is considered the generator of the residue or still bottom resulting from the recycling of the spent solvent by ETG's units. EPA considers the original generator of the spent solvents and ETG to be co-generators of these still bottoms, and the RCRA regulations regarding generators, found at 40 CFR Part 262, are applicable to both. However, this does not mean that both generators must satisfy each regulatory requirement individually. When two or more parties contribute to the generation of a hazardous waste, as is the case in the generation of the still bottoms, these requirements are satisfied if one of the parties assumes and performs the duties of the generator on behalf of both the parties (45 FR 72026, October 30, 1980). Therefore, by mutual agreement either party could perform the generator responsibilities of recordkeeping, reporting, and manifesting for the still bottom waste. Typically, these duties are assumed by the original generator who owns the site. Nevertheless, EPA reserves the right to enforce against any and all persons who fit the definition of "generator" in a particular case if the requirements of Part 262 are not adequately met. For more discussion on generator responsibilities, see the October 30, 1980 Federal Register notice referenced above.

Regarding the notification process, generator notifications under section 3010 of RCRA are generally required only once, at the time that RCRA regulations initially become applicable to the generator. It is through the notification

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process that a generator obtains an EPA identification number. If the original generator has already submitted a notification and

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received an EPA identification number, and if this generator consents to performing the generator duties for the still bottoms as described above, then, additional notification is not required for the mobile unit to perform the recycling operation. This arrangement appears to fit the circumstances described in your letter. However, should the agreement between ETG and a particular client prescribe that ETG be generator of record for the still bottoms, including manifesting the residue, ETG would need to obtain an EPA identification number for that particular site by submitting a notification form (40 CFR 262.12(a)).

You also inquire about the applicability of the permitting requirements to the generator or the mobile unit operator. Your letter correctly states that a hazardous waste recycling process is exempt from the RCRA permitting requirements (40 CFR 261.6(c)). Therefore, neither ETG nor the generator would be obligated to obtain a permit for the recycling operation. Further, generators are allowed to accumulate hazardous waste on-site in tanks or containers for up to 90 days without being required to obtain interim status or a permit (40 CFR 262.34). It should be noted, however, that 90-day generators must comply with the technical standards of Part 265, Subpart J (for tanks), and Subpart I (for containers), as well as certain emergency response and personnel training provisions. If the accumulation period before the waste is introduced into the recycling unit exceeds 90 days, the generator will need to obtain interim status or a permit for such storage.

Wastes or residues from recycling activities are considered to be newly generated wastes and therefore are also allowed a 90 day accumulation period without a permit. Note that these wastes are also "derived from" wastes and are assigned the same EPA waste codes as the spent solvent from which they are derived (40 CFR 261.3 (c)(2)(i)).

You also indicate in your letter that ETG will not be subject to the Part 268 land disposal restriction requirements since a permit is not required. However, you should note that the Part 268 standards apply independent of the permit program, and any such requirements that are applicable to a particular waste (e.g., the solvent still bottoms) must be compiled with regardless of the §262.34 accumulation provision.

I hope this information will be helpful to you. If you have further questions please feel free to call Frank McAlister at (202) 382-4740.

Sincerely yours,

Original Document signed

Joseph S. Carra
Director
Permits and State Programs Division

RO 13280

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