

<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 ( $\mu\text{g}/\text{cm}^2$ )		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
1106. Method Detection Limits and Hazardous Waste Determinations	ENCORE	APR 21, 2016
1107. Method Detection Limits and Hazardous Waste Determinations II	ENCORE	APR 28, 2016
1108. Radioactive Lead Solids vs. Non-radioactive Lead Contaminated Debris	ENCORE	MAY 5, 2016
1109. PCB Bulk Product Wastes and the One Year Disposal Requirement		MAY 12, 2016
1110. PCB Waste Storage Limitations and the One-Year Extension		MAY 19, 2016
1111. PCB Waste Storage Limitations and the PCB Radioactive Waste Exemption		MAY 26, 2016
1112. Separating Hazardous Debris and Hazardous Nondebris	ENCORE	JUN 2, 2016
1113. Product Expiration Dates and Solid Waste Determinations (Reverse Distribution)	ENCORE	JUN 9, 2016
1114. Satellite Accumulation Areas and Incompatible Wastes		JUN 16, 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 AREAS AND INCOMPATIBLE WASTES

**DATE:** JUNE 16, 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 Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Westcott 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 Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Christina Robison 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 Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz 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 Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** Satellite Accumulation Areas and Incompatible Wastes

**Q:** Per the EPA Federal regulations at [40 CFR 262.34\(c\)](#), a generator may accumulate as much as 55 gallons of hazardous waste (1 quart of acutely hazardous waste) in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the large quantity or small quantity generator requirements. This relief is contingent upon the generator complying with the interim status container management requirements for using a good condition container, a container compatible with the waste, and keeping the container closed except when adding or removing wastes. Conspicuously absent are the container management requirements for ignitable, reactive and incompatible wastes. In contrast, per the Washington state regulations at [WAC 173-303-200\(2\)](#), “Satellite accumulation”, in addition to the container management requirements referenced by the Federal regulations, Washington State added that SAA containers must not be managed in a manner that may rupture the container or cause it to leak, and that SAA containers are subject to the special requirements for ignitable, reactive and incompatible wastes. Why did EPA not impose ignitable, reactive or incompatible waste requirements on SAAs?

**A:** In an EPA memorandum entitled, “Frequently Asked Questions about Satellite Accumulation Areas”, dated March 17, 2004, (RCRA Online Number [14703](#)), EPA stated at question number 9:

*“Because the Agency did not anticipate that generators would accumulate multiple hazardous wastes/containers in an SAA, a cross-reference to the requirements for the safe storage of incompatible wastes was not included as part of the container management standards for SAAs. Nevertheless, good management practices clearly dictate that incompatible wastes should be stored separately. Furthermore, in the event that any wastes, including incompatible wastes, are stored in such a way that they may pose an imminent and substantial threat to health or the environment, §7003 of [RCRA](#) allows the Agency to take enforcement action to eliminate the threat.”*

Therefore, EPA did not anticipate more than one waste per SAA. However, even though the Federal satellite regulations do not reference the ignitable, reactive or incompatible container management requirements, SAAs should not be used to accumulate incompatibles that may endanger human health or the environment. If a generator was accumulating incompatible wastes in an SAA, EPA could issue an Administrative Order per §7003 of the Resource Conservation and Recovery Act to address the threat.

Washington State incorporated the additional container management standards to address ignitable, reactive and incompatible wastes and are therefore more stringent than the Federal regulations.

### SUMMARY:

- A generator may accumulate hazardous/dangerous waste as an SAA assuming the requirements of 40 CFR 262.34(c) or WAC 173-303-200(2) as applicable are met.
- The Federal SAA regulations do not specifically reference container management requirements for ignitable, reactive or incompatible wastes.
- However, if an SAA container is accumulating incompatible wastes that endanger human health or the environment, EPA can invoke RCRA’s §7003, “Imminent hazard” provision and issue enforcement action.

Excerpts from the EPA memo dated March 17, 2004, 40 CFR 262.34(c) and WAC 173-303-200(2) 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:** 6/16/16

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Satellite Accumulation Areas and Incompatible Wastes

### MEMORANDUM

**SUBJECT:** Frequently Asked Questions about Satellite Accumulation Areas

**FROM:** Robert Springer, Director  
Office of Solid Waste

**TO:** RCRA Directors, EPA Regions 1-10

### Purpose

The purpose of this memo is to reiterate and clarify the Environmental Protection Agency's (EPA) regulations under the Resource Conservation and Recovery Act (RCRA) hazardous waste management program regarding satellite accumulation areas (SAAs). For convenience, this memo pulls together answers to many of the frequently asked questions EPA receives regarding SAAs. Many, but not all, of the questions in this memo have been answered by EPA in previous letters and documents. For those questions that have been answered previously, citations to relevant memos and Federal Register preambles are provided in numbered endnotes.

....

**9. Question:** The preamble to the final rule that added 262.34(c), states, "...only one waste will normally be accumulated at each satellite area."<sup>8</sup> Can there be more than one hazardous waste at an SAA? Can there be more than one container at an SAA?

**Answer:** Yes. It's permissible to have more than one hazardous waste in an SAA. Likewise, it's permissible to have more than one container of hazardous waste in an SAA. The regulations do not limit the number of hazardous wastes or the number of containers that can be placed in an SAA. The regulations limit only the total volume of hazardous waste at a single SAA to 55 gallons (or 1 quart of acute hazardous waste). If there are multiple containers of hazardous waste in an SAA, each container must be labeled in accordance with 262.34(c)(1)(ii).

Because the Agency did not anticipate that generators would accumulate multiple hazardous wastes/containers in an SAA, a cross-reference to the requirements for the safe storage of incompatible wastes was not included as part of the container management standards for SAAs. Nevertheless, good management practices clearly dictate that incompatible wastes should be stored separately. Furthermore, in the event that any wastes, including incompatible wastes, are stored in such a way that they may pose an imminent and substantial threat to health or the environment, §7003 of RCRA allows the Agency to take enforcement action to eliminate the threat.

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## **TWO MINUTE TRAINING - ATTACHMENT**

**SUBJECT:** Satellite Accumulation Areas and Incompatible Wastes

### **40 CFR §262.34 Accumulation time**

(c)

(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.31 or §261.33(e) in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) or (d) of this section provided he:

(i) Complies with §§265.171, 265.172, and 265.173(a) of this chapter; and

(ii) Marks his containers either with the words “Hazardous Waste” or with other words that identify the contents of the containers.

(2) A generator who accumulates either hazardous waste or acutely hazardous waste listed in §261.31 or §261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) and (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

### **40 CFR §265.171 Condition of containers**

If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

### **40 CFR §265.172 Compatibility of waste with container**

The owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

### **40 CFR §265.173 Management of containers**

(a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Satellite Accumulation Areas and Incompatible Wastes

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

(2) Satellite accumulation.

(a) A generator may accumulate as much as fifty-five gallons of dangerous waste or one quart of acutely hazardous waste (as defined in WAC 173-303-040) in containers at or near any point of generation where waste initially accumulates (defined as a satellite accumulation area in WAC 173-303-040). The satellite area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes to a satellite container. Satellite accumulation is allowed without a permit provided the generator:

(i) Complies with WAC 173-303-630 (2), (4), (5) (a) and (b), (8)(a), and (9) (a) and (b); and

(ii) Complies with subsection (1)(d) [*major risk markings*] of this section.

(b) When fifty-five gallons of dangerous waste or one quart of acutely hazardous waste (as defined in WAC 173-303-040) is accumulated, the container(s) must be marked immediately with the accumulation date and moved within three days to a designated storage or accumulation area.

(c) On a case-by-case basis the department may require the satellite area to be managed in accordance with all or some of the requirements under subsection (1) of this section, if the nature of the wastes being accumulated, a history of spills or releases from accumulated containers, or other factors are determined by the department to be a threat or potential threat to human health or the environment.

### **WAC 173-303-630 Use and management of containers.**

(2) Condition of containers. If a container holding dangerous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the dangerous waste from the container to a container that is in good condition or manage the waste in some other way that complies with the requirements of chapter 173-303 WAC. In addition, the owner or operator must address leaks and spills in accordance with the applicable provisions of WAC 173-303-145 and 173-303-360.

(4) Compatibility of waste with containers. The owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the dangerous waste to be stored, so that the ability of the container to contain the waste is not impaired.

(5) Management of containers.

(a) A container holding dangerous waste must always be closed, except when it is necessary to add or remove waste.

(b) A container holding dangerous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

**FROM:** Paul W. Martin

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Satellite Accumulation Areas and Incompatible Wastes

**WAC 173-303-630 Use and management of containers.**

(8) Special requirements for ignitable or reactive waste.

(a) Containers holding reactive waste exhibiting a characteristic specified in WAC 173-303-090 (7)(a)(vi), (vii) or (viii) must be stored in a manner equivalent to the International Fire Code's "*American Table of Distances for Storage of Explosives*" Table 3304.5.2(2) or "*Table of Separation Distances for Low Explosives*" Table 3304.5.2(3), 2003 edition, or the version adopted by the local fire district.

(9) Special requirements for incompatible wastes.

(a) Incompatible wastes, or incompatible wastes and materials must not be placed in the same container, unless WAC 173-303-395 (1)(b) is complied with.

(b) Dangerous waste must not be placed in an unwashed container that previously held an incompatible waste or material.