

<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

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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: LDR NOTIFICATIONS AND F001-F005 CONSTITUENTS OF CONCERN – AGAIN

DATE: NOVEMBER 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 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 Jennie Stults Roni Ashley Michael Waters Jeff Widney	Brett Barnes Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins 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: LDR Notifications and F001-F005 Constituents of Concern - Again

Q: A generator uses xylene to cleanup a fresh paint spill. Based on analysis the generator knows that the wastestream contains xylene, paint, and trace amounts of acetone and methanol used as ingredients in the paint. Since the xylene was clearly used as a solvent the wastestream is designated as F003 and destined for treatment to meet the land disposal restrictions (LDR) treatment standard. Considering last week's "Two Minute Training" on constituents of concern, which constituents (xylene, acetone and/or methanol) would the generator identify on the LDR form as constituents of concern?

A: As we learned last week, "constituents of concern" include only those F001 - F005 constituents that exceed an applicable LDR treatment standard and require treatment to meet an LDR standard. The xylene is a constituent of concern since it is an F003 constituent that exceeds the applicable LDR treatment standard. The acetone and methanol are not constituents of concern since the acetone and methanol were used as ingredients in the paint which under RCRA do not meet an F listing description. Since the acetone and methanol do not meet the F003 listing description, they cannot be constituents of concern.

An [EPA Memo dated March 1990 \(RO 13359\)](#) addressed a similar situation with xylene as a solvent and methanol as a trace contaminant that had been used as a fuel. Since the methanol was used as a fuel and not as a solvent subject to the F listings, the methanol was not a constituent of concern.

Therefore, the generator would identify only the xylene as a F001-F005 constituent of concern on the LDR form. The acetone and methanol do not meet an F001-F005 listing description and cannot be F001-F005 constituents of concern.

SUMMARY:

- "Constituents of concern" for F001 - F005 wastes must be identified on the LDR notice.
- "Constituents of concern" include only those F001 - F005 constituents that exceed an applicable LDR treatment standard and require treatment to meet an LDR standard.
- If a waste contains constituents that do not meet the specific F001-F005 listing descriptions, those constituents are not F001-F005 constituents of concern.

The March 1990 EPA memo 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: 11/5/15

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: LDR Notifications and F001-F005 Constituents of Concern - Again

Faxback 13359

9554.1990(04)

RCRA/SUPERFUND HOTLINE SUMMARY

MARCH 1990

3. Treatment Standards for Methanol Which Does Not Meet the F003 Listing

A generator uses xylene for cleaning purposes. At the point of generation the generator determines that he has generated a F003 spent solvent waste, subject to the land disposal restrictions. The F003 listed waste has traces of methanol in it where the methanol was used as a fuel. Would the notification sent by the generator in 268.7(a)(1) to the treatment, storage or disposal facilities (TSDFs) have to include the corresponding treatment standards for methanol as well as for xylene?

No. The generator would only have to include the treatment standards for the xylene and not for the methanol to be in compliance with Section 268.7(a)(1). The methanol in this case was not used for its solvent properties and would not meet any of the spent solvent listings, which are prohibited from land disposal without first meeting the treatment standards in 40 CFR 268, Subpart D. The spent solvent listings cover only those solvents that are used for their solvent properties; which is to solubilize, dissolve or mobilize other constituents (51 FR 40606). A solvent is considered spent when it is no longer fit for use without being regenerated, reclaimed or otherwise reprocessed. Where solvents were used as reactants or ingredients in the formulation of commercial chemical products, they are not included in the listing (see December 31, 1985 Federal Register; 50 FR 53315 and the original solvent listing background document, November 14, 1980).

Supporting data should be maintained on-site in the generator's files.

Sources: Rhonda Craig, OSW (202) 382-7926
Ron Josephson, OSW (202) 382-4792
Thomas Ovenden, OSW (202) 475-6715

Research: Renee T. LaValle

FROM: Paul W. Martin

DATE: 11/5/15

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