

<u>SUBJECT</u>		<u>DATE</u>
1320.	Treated Hazardous Waste Used as Dust Suppressant	FEB 28, 2019
1321.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE MAR 7, 2019
1322.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE MAR 14, 2019
1323.	Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE MAR 21, 2019
1324.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE MAR 28, 2019
1325.	PCB Decontamination Standard with No Decontamination Performed	ENCORE APR 4, 2019
1326.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE APR 11, 2019
1327.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE APR 18, 2019
1328.	PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²)	ENCORE APR 25, 2019
1329.	Operating Record vs. Operating Log	ENCORE MAY 2, 2019
1330.	Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE MAY 9, 2019
1331.	Washington State Used Oil and Mixtures with Other Materials	ENCORE MAY 16, 2019
1332.	Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE MAY 23, 2019
1333.	Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE MAY 30, 2019
1334.	Universal Waste Alkaline Batteries and Self-Transportation	ENCORE JUN 6, 2019
1335.	Universal Waste Lithium Batteries and Self-Transportation	ENCORE JUN 13, 2019
1336.	RCRA Hazard Labeling – A Random Scenario	ENCORE JUN 20, 2019
1337.	Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE JUN 27, 2019
1338.	Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE JUL 3, 2019
1339.	The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE JUL 11, 2019
1340.	Central Accumulation Areas and Signage Requirements	ENCORE JUL 18, 2019
1341.	RCRA EPA Identification Numbers – Site Specifics	ENCORE JUL 25, 2019
1342.	RCRA EPA Identification Numbers – Transporters	ENCORE AUG 1, 2019
1343.	Paint Wastes and the Applicability of the F001-F005 Listings to Ingredients	ENCORE AUG 8, 2019
1344.	F Listings and Ingredients in Commercial Chemical Product Formulations	ENCORE AUG 15, 2019
1345.	PCB Containers and ≥50 ppm	ENCORE AUG 22, 2019
1346.	CERCLA Hazardous Substances – The Petroleum Exclusion	ENCORE AUG 29, 2019
1347.	PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE SEP 5, 2019
1348.	RCRA LR One-Year Storage Prohibition vs., PCB One-Year Disposal Time Limit	ENCORE SEP 12, 2019
1349.	Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978	ENCORE SEP 19, 2019
1350.	Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978 – A Follow-Up	ENCORE SEP 26, 2019
1351.	PCB Waste Regulation and April 18, 1978 vs. July 2, 1979	ENCORE OCT 3, 2019
1352.	PCB Waste Storage Limitations and the One-Year Extension	ENCORE OCT 10, 2019
1353.	PCB Waste Storage Limitations and the PCB Radioactive Waste Exemption	ENCORE OCT 17, 2019
1354.	LDR One-Year Storage Prohibition and Generator Permitted Storage	ENCORE OCT 24, 2019
1355.	LDR Notification/Certification and Generator Permitted Storage	ENCORE OCT 31, 2019
1356.	Disposing of PCB Ballasts with PCB Potting Material	ENCORE NOV 7, 2019
1357.	Fluorescent Light Ballasts and PCB Annual Reporting	ENCORE NOV 14, 2019
1358.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE NOV 21, 2019
1359.	Multiple Characteristic and Listed Hazardous Waste Codes and the “in lieu of” LDR Principle	ENCORE NOV 26, 2019
1360.	Universal Waste Lamps and Prohibition on Crushing	ENCORE DEC 5, 2019
1361.	Used Oil and Weekly Inspections	ENCORE DEC 12, 2019
1362.	Used Oil and Keeping Containers Closed – Washington State vs. the Feds	ENCORE DEC 19, 2019
1363.	’Twas the Night Before Christmas – The Twenty-Sixth Annual Edition	ENCORE DEC 24, 2019
1364.	Generator Weekly Inspection Log Documentation – Federal vs. WA State	ENCORE JAN 2, 2020

TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

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

SUBJECT: GENERATOR WEEKLY INSPECTION LOG DOCUMENTATION – FEDERAL VS. WA STATE

DATE: JANUARY 2, 2020

<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>
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TWO MINUTE TRAINING

SUBJECT: Generator Weekly Inspection Log Documentation – Federal vs. WA State

Q: What are the Federal and the State of Washington generator requirements for documenting central accumulation area (less-than-90-day) container inspections and any subsequent corrective actions?

A: Per [40 CFR 262.17](#), a generator may accumulate hazardous waste on-site for 90 days or less without a permit provided that (among other things), the waste is placed in containers and the generator conducts at least weekly inspections. The generator inspection regulation at 40 CFR 262.17(a)(v) states that inspections must include looking for leaking containers and deterioration of containers and to see 40 CFR 262.17(a)(1)(ii) for remedial actions required if deterioration or leaks are detected. However, there is no Federal requirement to document inspections or any corrective actions taken. Therefore, generators subject to Federal or Federally equivalent State regulations are not required to document weekly inspections or subsequent corrective actions. However, it is a best management practice for the generator to demonstrate regulatory compliance to regulators and documentation is a good demonstration.

Per the Washington Administrative Code (WAC), [173-303-200](#), Washington State generators may also accumulate dangerous waste on-site for 90 days or less without a permit provided that (among other things), the waste is placed in containers and the generator conducts at least weekly inspections looking for leaking containers and deterioration of containers and the containment system. Note that the WAC reference to inspecting the containment system is more stringent than the Federal requirements, which only requires inspection of the containers. The generator inspection regulation at WAC 173-303-200(3)(d) states that the generator must keep an inspection log noting the observations made and the nature of any repairs or remedial actions. Therefore, Washington State generators, unlike Federal generators, are required to document weekly inspections and any subsequent corrective actions taken.

The State of Washington has chosen to be more stringent than the Federal regulations by requiring documentation of inspections performed and corrective actions taken.

SUMMARY:

- Generators subject to Federal or Washington State regulations can accumulate hazardous/dangerous wastes on-site for 90-days or less without a permit, provided that (among other things), at least weekly inspections are conducted.
- Federal regulations require that generators look for leaks and deterioration of containers but do not require documentation of inspections performed or corrective actions taken.
- WA State regulations also require generators to look for leaks and deterioration of containers and the containment system but do require documentation of inspections performed and corrective actions taken.

Pertinent regulations from 40 CFR 262.17 and WAC 173-303-200 are attached to the e-mail. If you have any questions, please contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Generator Weekly Inspection Log Documentation – Federal vs. WA State

40 CFR §262.17 Conditions for exemption for a large quantity generator that accumulates hazardous waste

A large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, or the notification requirements of section 3010 of RCRA, provided that all of the following conditions for exemption are met:

(a) *Accumulation.* A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section. The following accumulation conditions also apply:

(1) *Accumulation of hazardous waste in containers.* If the hazardous waste is placed in containers, the large quantity generator must comply with the following:

(ii) *Condition of containers.* If a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section;

(v) *Inspections.* At least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of this section for remedial action required if deterioration or leaks are detected.

WAC 173-303-200 Conditions for exemption for a large quantity generator that accumulates dangerous waste.

Large quantity generators, not to include transporters as referenced in WAC 173-303-240(3), may accumulate dangerous waste on site without a permit or interim status, and without complying with the requirements of WAC 173-303-600 provided that all of the following conditions for exemption listed in this section are met.

(3) Accumulation of waste in containers.

(a) Condition of containers. If a container holding dangerous waste is not in good condition (e.g., severe corroding or rusting or flaking or scaling, and/or apparent structural defects) or if it begins to leak or is leaking, the generator must transfer the dangerous waste from this container to a container that is in good condition and does not leak and continue to manage that container and waste in compliance with the conditions for exemption in this section. 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.

(d) Inspections. The generator must conduct "weekly inspections," as defined in WAC 173-303-040, of each central accumulation area looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, deterioration, or other factors. The generator must keep a written or electronic inspection log including at least the date and time of the inspection, the printed name and the handwritten or electronic signature of the inspector, a notation of the observations made and the date and nature of any repairs or remedial actions taken. The log must be kept at the facility for at least five years from the date of inspection. See subsection (5)(a) of this section for remedial action required if deterioration or leaks are detected.

(5)(a) [wood treatment drip pad requirements] is a typo and should be (3)(a). PWWMartin comment.