

<u>SUBJECT</u>			<u>DATE</u>
1254.	Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1255.	PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1256.	Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1257.	Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1258.	Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1259.	'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1260.	The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1261.	Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2017

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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 AND PRODUCT VESSEL CLEANOUTS

DATE: JANUARY 4, 2018

<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 Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Sasa Kosjerina Jim Leary Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Satellite Accumulation and Product Vessel Cleanouts

Q: A customer is cleaning out a product vessel (tank) and will immediately accumulate 5, 55-gallon drums of nonacutely hazardous waste sludge near the tank location. As opposed to managing the five drums of waste as a ≤ 90 -day accumulation area, can the customer manage the waste as a satellite accumulation area and if so, how?

A: Per [WAC 173-303-200\(c\)](#), [[40 CFR 262.15](#)] “Accumulating dangerous waste on-site”, a satellite accumulation area is basically limited to a total volume of 55 gallons of hazardous waste with any excess waste requiring management within 3 days at a ≤ 90 -day accumulation area or at an interim status/permitted treatment, storage or disposal facility (TSDF). This means that the customer could immediately accumulate 55-gallons of hazardous waste as a satellite accumulation area and then manage any excess amount (the first four containers in this case) within three days at a ≤ 90 -day area or TSDF.

As further confirmation, the January 3, 1983, Federal Register that proposed the satellite accumulation regulations stated on page 120:

“Hazardous wastes are sometimes generated when product vessels in manufacturing plants are periodically cleaned out. This maintenance procedure may produce a number of drums of hazardous waste which, according to the current regulations, must be managed in accordance with §262.34(a) [now 262.15] as accumulation begins. Some generators find this requirement unreasonable, explaining that these drums are commonly removed from the clean-out area within two or three days, and therefore the immediate need to comply with the regulatory requirements for 90-day accumulation poses an unreasonable burden. Under the amendment being proposed today, a generator would have 72 hours after the first 55 gallons are accumulated in which to comply with either §262.34(a) for continued on-site accumulation, or other hazardous waste management standards, as appropriate. EPA believes that today’s proposal would alleviate the problems that generators experience with complying with §262.34(a) during maintenance of product vessels.”



Federal Register for
January 3, 1983 - Ha

Note that as originally proposed, the requirement to move excess waste was within 72 hours as opposed to 3 days. However, EPA finalized the 3-day rule since tracking via precise hours would be an undue burden.

Therefore, the customer could accumulate the 5, 55-gallon containers as a satellite accumulation area but would have to move the excess amount (at least the first four of the 55-gallon containers) within three days of immediately exceeding the 55-gallon limit for a satellite accumulation area.

SUMMARY:

- Satellite accumulation areas are limited to 55 gallons of nonacutely hazardous waste.
- Any waste in excess of the 55-gallon limit must be managed within three days at a ≤ 90 -day area or TSDF.
- If a generator immediately exceeds the 55-gallon limit for a satellite accumulation area, the excess waste must be managed with three days at a ≤ 90 -day area or TSDF.

WAC 173-303-040, WAC 173-303-200(c) and 40 CFR 262.15 are attached. 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.

FROM: Paul W. Martin

DATE: 1/4/18

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Satellite Accumulation and Product Vessel Cleanouts

WAC 173-303-040 Definitions

"Satellite accumulation area" means a location at or near any point of generation where hazardous waste is initially accumulated in containers (during routine operations) prior to consolidation at a designated ninety-day accumulation area or storage area. The 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 into the satellite containers.

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) 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.

(3) For the purposes of this section, the ninety-day accumulation period begins on the date that:

(a) The generator first generates a dangerous waste; or

(b) The quantity (or aggregated quantity) of dangerous waste being accumulated by a small quantity generator first exceeds the accumulation limit for such waste (or wastes); or

(c) Fifty-five gallons of dangerous waste or one quart of acutely hazardous waste (as defined in WAC 173-303-040) is accumulated in a satellite accumulation area.

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Satellite Accumulation and Product Vessel Cleanouts

40 CFR §262.15 Satellite accumulation area regulations for small and large quantity generators *

(a) A generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in §261.31 or §261.33(e) of this chapter or 1 kg (2.2 lbs) of solid acute hazardous waste listed in §261.31 or §261.33(e) of this chapter 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 requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in §262.16(b) or §262.17(a), except as required in §262.15(a)(7) and (8). The conditions for exemption for satellite accumulation are:

- (1) If a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area operated in compliance with §262.16(b) or §262.17(a).
- (2) The generator must use a container made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be accumulated, so that the ability of the container to contain the waste is not impaired.
- (3) Special standards for incompatible wastes.
 - (i) Incompatible wastes, or incompatible wastes and materials, (see appendix V of part 265 for examples) must not be placed in the same container, unless §265.17(b) of this chapter is complied with.
 - (ii) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material (see appendix V of part 265 for examples), unless §265.17(b) of this chapter is complied with.
 - (iii) A container holding a hazardous waste that is incompatible with any waste or other materials accumulated nearby in other containers must be separated from the other materials or protected from them by any practical means.
- (4) A container holding hazardous waste must be closed at all times during accumulation, except:
 - (i) When adding, removing, or consolidating waste; or
 - (ii) When temporary venting of a container is necessary
 - (A) For the proper operation of equipment, or
 - (B) To prevent dangerous situations, such as build-up of extreme pressure.
- (5) A generator must mark or label its container with the following:
 - (i) The words “Hazardous Waste” and
 - (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Satellite Accumulation and Product Vessel Cleanouts

(6) A generator who accumulates either acute hazardous waste listed in §261.31 or §261.33(e) of this chapter or non-acute hazardous waste in excess of the amounts listed in paragraph (a) of this section at or near any point of generation must do the following:

(i) Comply within three consecutive calendar days with the applicable central accumulation area regulations in §262.16(b) or §262.17(a), or

(ii) Remove the excess from the satellite accumulation area within three consecutive calendar days to either:

(A) A central accumulation area operated in accordance with the applicable regulations in §262.16(b) or §262.17(a);

(B) An on-site interim status or permitted treatment, storage, or disposal facility, or

(C) An off-site designated facility; and

(iii) During the three-consecutive-calendar-day period the generator must continue to comply with paragraphs (a)(1) through (5) of this section. The generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

(7) All satellite accumulation areas operated by a small quantity generator must meet the preparedness and prevention regulations of §262.16(b)(8) and emergency procedures at §262.16(b)(9).

(8) All satellite accumulation areas operated by a large quantity generator must meet the Preparedness, Prevention and Emergency Procedures in subpart M of this part.

(b) [Reserved]

* Note that 40 CFR 262.15 is the new regulation promulgated November 28, 2016, and is semi-equivalent to former regulation at 40 CFR 262.34(c).

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